



All responses received to the Publication Draft Local Plan (Regulation 19)  
[https://www.richmond.gov.uk/services/planning/planning\\_policy/local\\_plan/draft\\_local\\_plan/draft\\_local\\_plan\\_publication\\_version](https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/draft_local_plan/draft_local_plan_publication_version)  
 Consultation from 9 June 2023 until 24 July 2023

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Please note, the responses below are exactly as received from the respondents and have not been edited by the Council. They are not alphabetically ordered or in any other order of priority; they follow the Plan order. Comments have been moved/grouped so that common points are viewed together. The schedule shows where any personal information within responses relating to contact details, particularly full address data, has been removed stating e.g. [personal details removed for data protection] or shown as black rectangles in the appendices. The columns relate to questions on the [response form](#); where fields were not completed, responses have been set out in the schedule where they could be assigned e.g. views on soundness, modifications suggested. Appendices have been made available separately where due to the length or nature of responses they could not be captured within the main Schedule. The officer references added are shown in the Schedule as [See Appendix....] Each response in full (with redactions) is also available as a single pdf that can be viewed via the webpage with all the Publication responses.

Rep No.	Respondent name	Part(s) of Local Plan responding to:	Do you consider the Local Plan is			Do you consider the Local Plan is unsound because it is <u>not</u> :	Details of reason(s) for representation	Modification(s) consider necessary
			Legally compliant	Sound	Complies with the Duty to Co-operate			
-	<b>General</b>							
1	Elena <b>Mikhaylova</b>	General – cost of Plan and consultation	No	N o	N o	Positively Prepared; Effective; Justified; Consistent with national policy	Firstly, I would like to comment that it's not acceptable that the Council have been developing this plan using taxpayers' money with no initial consolation. I have submitted a FOI request to see how much money has been spent on this plan and which organisations have benefited from it. The next step there will be a further investigation whether any of the public funds have been spent unlawfully / been embezzled. Secondly, the current consultation period is too short and the local communities have not been appropriately notified of this plan. Only a small percentage of people would have found out about this Plan through your email notification. That keeps a vast majority of people in the dark and therefore the representation of people commenting on this Plan is not significant. Below I have provided comments to specific policies and what actions will be taken against the Council if the proposed changes go ahead. [See comments 66, 309, 326 and 538]	All policies mentioned in my comments above must be cancelled immediately.
2	Julie <b>Scurr</b>	Local Plan (general)					Overall, the whole plan is rather depressing, concentrating as it does on building on every scrap of available space within the borough, all in an unimaginative way cramming in as many housing "units" as possible, usually with building heights in excess of their current surrounding areas, with a small nod to "public realm" which is usually a small square with a couple of benches that soon gather discarded rubbish and fall into disrepair – a space for anti social behaviour and most like drug dealing. This will turn our lovely borough into an urban, rather than suburban, area. This intensity of building should not be considered without first securing commitment to an increase in policing across the borough and a reinstatement of the police station in Richmond.	
3	Mary <b>Stone</b>	Local Plan (general)					I'm finding it extremely difficult to pass on my response to this. I am in favour of the plan and want that to be recorded.	
4	Solomon <b>Green</b>	Local Plan (general)					First let me congratulate you and your team on producing an exceptionally readable and comprehensive document both as to looks and content. My comments are few. Probably inappropriate but worth mentioning [See comments 390, 459 and 549]	
5	Michael <b>Atkins, Port of London Authority (PLA)</b>	Local Plan (general)	Ye s	Y e s	Y e s		Thank you for consulting the Port of London Authority (PLA) on the London Borough of Richmond Upon Thames Publication Local Plan (Regulation 19) consultation. I have now had the opportunity to review the consultation documents and can confirm the PLA has no further comments to make on the Local Plan. It is welcomed that proposed amendments to policies 39 (Biodiveristy & Geodiversity), 40 (Rivers and River Corridors) and 41 (Moorings and Floating Structures) raised as part of the regulation 18 consultation have been taken into account in the publication Local Plan, and therefore the PLA considers the Local Plan to be sound.	

6	Mike Corbett, Runnymede Borough Council	General				Thank you for consulting Runnymede Borough Council. We have no comments to make on the Publication Local Plan.
7	Hannah Harris, Royal Borough of Kingston upon Thames	General, Duty to Cooperate				Thank you for the opportunity to submit comments to the London Borough of Richmond upon Thames Publication Version Local Plan Regulation 19 Consultation. At the Regulation 19 stage of the plan-making process, in accordance with the National Planning Policy Framework, consultation responses should focus on legal and procedural compliance, including the duty to cooperate, and the soundness of the Plan. The Royal Borough of Kingston upon Thames does not wish to comment on the soundness of the Publication Version Local Plan. Both Councils have cooperated on cross boundary and strategic matters during the course of the Local Plan preparation. We welcome the opportunity to continue working cooperatively together through Kingston's Local Plan preparation and going forward.
8	Hannah Bridges, Spelthorne Borough Council	General, Duty to Cooperate				Thank you for consulting Spelthorne Borough Council on the London Borough of Richmond Regulation 19 Local Plan. We have in previous correspondence and discussions with LB Richmond identified the following strategic, cross-boundary matters between our local authorities: housing; flood risk, with continued joint working arrangements; and Green Belt. [See comment 345 in relation to housing] <u>Spelthorne Local Plan</u> The Spelthorne Local Plan was submitted to the Secretary of State for Levelling Up, Housing and Communities for Examination on 25 November 2022. The spatial strategy is centred on an efficient use of brownfield land in the urban area and a small amount of Green Belt release to meet specific needs of the community. The Local Plan is currently under examination and the Week 1 hearings took place in May 2023. However, following an Extraordinary Council Meeting on 6 June 2023 where a motion was agreed to pause the remainder of the Local Plan examination hearings, the Chief Executive wrote to the Planning Inspectorate to put forward this request on behalf of the Council. The Council will meet on 14 September 2023 to determine what actions may be necessary before the Local Plan examination may proceed. We have through the Duty to Co-operate had the opportunity for discussion as part of the process of the preparation of our respective Local Plans but we will keep under review potential implications on strategic matters and the Duty to Cooperate that may arise as a result of the pause and will be in touch in due course. Please note that this response is at officer level and as such, Spelthorne Borough Council reserves the right to raise any further issues during the preparation of the LB Richmond Local Plan if Members of the Council wish to do so. We look forward to continued discussions through the Duty to Co-operate and continued joint working.
9	Tim Brennan, Historic England	Local Plan				<b>London Borough of Richmond – Regulation 19 Consultation on draft Local Plan</b> Thank you for the opportunity to comment on the above consultation document as well as our recent meeting to discuss certain areas of the emerging Plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process. Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). They focus in particular on whether the draft Plan makes sufficient provision for the conservation and enhancement of the historic environment in Richmond through strategic policies (NPPF, para 20), whether the identified evidence base for the historic environment is relevant and up to date (para 31) and if it therefore sets out a positive strategy for its conservation and enjoyment (para 185). As with the previous consultation version of the draft Plan, we note and welcome the approach to the historic environment within the plan, both in a cross-cutting sense and with regard to specific policies. Our comments on this consultation draft are therefore limited in nature and principally relate to detail around individual policies and are designed to ensure that the draft Plan is fully justified, effective and in conformity with national and regional planning policy in terms of the NPPF's test of soundness. We also welcome a number of amendments made to the draft Plan in response to our previous consultation letter, including those within policy 29 Designated Heritage Assets and policy 31 Views and Vistas. [See other comments 80, 188, 275, 292, 308, 446, and 506] I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment. In the meantime, please do not hesitate to contact me should you require any further information.
10	Sammantha Rose, National Highways	Local Plan Publication (Regulation 19)				<b>Publication of the proposed submission London Borough of Richmond upon Thames – Local Plan Publication under Regulation 19 of the Town and Country Planning Regulations (Local Planning) (England) 2012.</b> National Highways welcomes the opportunity to provide our comments on the Local Plan Publication (Regulation 19) version. National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the

					<p>Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. For the purposes of the Richmond Local Plan, we would be concerned with development patterns that have the potential to impact on the operation of M3 Junction 1 and M4 Junctions 1 to 3.</p> <p>As a statutory consultee to the Local Plan consultation, we are interested in the potential traffic impacts of any development site proposals and/or policies coming forward which may impact on the operation of our network and the need to ensure that any impacts are fully understood at the plan-making stage.</p> <p>We have undertaken a review of the 'Richmond Draft Local Plan (Regulation 19) Consultation Version' and we agree with the themes and objectives set out in the Plan. These include the themes of 'reducing the need to travel' and 'improving the choices for more sustainable travel'. We also see the advantages of creating development that has a 'mixed pattern of land uses' and which limits car parking provision. These measures will help to reduce the need for travel and help to encourage sustainable transport journeys for those that do travel.</p> <p>For National Highways, the safety and operation of the SRN is our primary consideration. In terms of traffic impacts on the SRN, we take the view that development proposals would be unacceptable, by virtue of an unacceptable road safety impact or severe congestion impacts, in accordance with DfT Circular 01/2022 and NPPF.</p> <p>DfT Circular 01/2022 confirms in paragraph 28 that <i>'the policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan'</i>.</p> <p>The Circular also states in paragraph 29 that <i>'capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure will be funded through a future RIS'</i>.</p> <p>Whilst sustainable transport measures are welcomed and encourage, there may still be a requirement for physical highway network improvements, if the assessment of the transport implications of the Plan show that unacceptable road safety or severe congestion impacts are likely on the SRN.</p> <p>We look forward to continuing to participate in future consultations and discussions. Please do continue to consult us as the Plan progresses so that we can remain aware of, and comment as required on, its contents. Should a virtual meeting be beneficial to take this forward, please let us know at your earliest opportunity.</p>	
11	Richard Carr, Transport for London (TfL)	Local Plan Publication (Regulation 19) (general comments in relation to the vision, transport policies and evidence base)			<p><i>Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Transport Trading Limited Properties (TTLP) – formerly TfL Commercial Development, to reflect TfL's interests as a landowner and potential developer.</i></p> <p>Thank you for giving Transport for London (TfL) the opportunity to comment on Richmond's draft local plan. As you are aware, the London Plan 2021 was published in March 2021 and now forms part of Richmond's development plan.</p> <p>We previously responded to the Regulation 18 consultation and are pleased to note that a number of our points have been addressed and so we set out updated comments to reflect these changes in the appendix below. [See comments in this schedule in relation to place-based strategies, site allocations and policies].</p> <p>As previously stated we strongly welcome your aspirations to implement the 20 minute neighbourhood concept, reduce the need to travel and improve the choices for more sustainable travel. In particular, we welcome the ambitions set out in the draft local plan to: decrease car use and achieve mode split targets and implement the Healthy Streets Approach. We are pleased to see the plan's recognition of the importance of active travel and public transport.</p> <p>However, it would be helpful if reference could also be made to achieving the Mayor's Vision Zero ambition for road safety. We note from the consultation statement that you do not believe this is a planning issue. However, a clear ambition provides a justification for requiring road safety measures as part of development proposals and associated highways improvements.</p> <p>We commend you for adopting London Plan parking standards and the encouragement of car free development. This positive approach was not always reflected in site allocations which referred to car parking requirements or needs in the Regulation 18 draft. We therefore welcome amended wording and additional references to London Plan standards although there are still a few instances where we recommend further amendments to ensure consistency with the London Plan.</p> <p>We welcome your intention to seek contributions towards active travel improvements and enhanced public transport capacity and infrastructure. We also welcome the safeguarding of transport land, and we support the extension of this safeguarding to existing transport infrastructure as well as future schemes.</p> <p>In our Regulation 18 consultation response, we recommended that you consider the potential need for a borough-wide strategic transport assessment which would look at the cumulative impact of major site allocations and the expected background growth in travel. We note from the consultation statement that you do not see a need for a strategic</p>	

							transport assessment but have instead referred to pre application advice and use of TfL and national modelling tools in order to take into account cumulative impacts as part of the transport assessment process. We understand that you intend to draw together information that already exists on the likely transport impact of the Local Plan, into a background paper. We welcome this approach and look forward to reviewing the draft background paper. Our updated responses to specific points in the draft local plan are set out in the attached appendix. [See comments in this schedule in relation to place-based strategies, site allocations and policies]. We look forward to continuing to work together in drafting the final document and are committed to continuing to work closely with the GLA to deliver integrated planning and make the case for continued investment in transport capacity and connectivity to enable Good Growth in Richmond and across London.	
12	Molly Dadswell, <b>Natural England</b>	General	Yes	Yes	Yes		Thank you for your consultation on the above dated 09 June 2023 which was received by Natural England on the same date. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. <b>Natural England are content that the local plan will not have an adverse impact on the natural environment or designated sites and have no comments.</b>	
-	Jon Rowles	Habitats Regulation Assessment					[See comment 233 in relation to the sustainability report]	
13	James Stevens, <b>Home Builders Federation</b>	Local Plan Publication (Regulation 19) - June 2023 (general)					Thank you for consulting upon the new Richmond-upon-Thames Local Plan, Regulation 19 consultation version. James Stevens, the HBF's Director for Cities, has prepared this response and he is the lead contact for all things in relation to the Local Plan. The Home Builders Federation (HBF) is the principal representative body of the house building industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational plc's, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year. Recent research by the Government has estimated that housebuilders have made a significant contribution to the nation's infrastructure, providing some £21 billion towards infrastructure of all types including affordable housing since 2005. <b>We would like to submit the following representations on the draft Plan. We also would like to register our wish to be involved in subsequent examination of the new Local Plan. I hope these comments will help the Council to prepare the next iteration of the Local Plan. The HBF would be happy to speak to the Council to discuss the content of these representations further.</b>	
14	Mark Jopling, <b>Udney Park Playing Fields Trust</b>	Local Plan Publication (Regulation 19) (general site comments – Udney Park Playing Fields)					The Udney Park Playing Fields Trust welcomes the continued planning protections in the draft Local Plan for Udney Park as a Local Green Space, Other Open Land of Townscape Importance and Asset of Community Value whose ability to serve the community arises from its function as: a playing field for amateur sports clubs, a War Memorial and Building of Townscape Merit and as an important site in the local ecology network.	
15	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	Local Plan Publication (Regulation 19) Urban Design Study (2023)					Prospect of Richmond is a group of local residents that have extensive knowledge and experience of living in or near Richmond Town and the surrounding area. Two of us have been past chairs of the Richmond Society and one a past chair of the Friends of Richmond Green and one of us chairs the Richmond Heathrow Campaign comprising the Richmond Society, Kew Society and the Friends of Richmond Green. While not part of this response we have extensive involvement with the adjacent Old Deer Park. Two are architects. Individually and together, we have been involved with many planning, licensing, traffic, heritage, charity, cultural and other matters. We are dedicated to the preserving and improving the area for the benefit of residents and other stakeholders. Over many years we have engaged extensively with Richmond upon Thames Council (Council) and are keen to continue doing so. <b>BASIS OF OUR RESPONSE</b> Prospect of Richmond has examined the schedule of extracts from the Council's Consultation Statement of June 2023 detailing responses from the Prospect of Richmond in January 2022 to the Pre-Publication draft Local Plan and the Council's responses. The schedule was prepared by the Council and emailed to the Prospect of Richmond on 20 July 2023. The schedule is attached as Annex 1 [See Appendix 12]. We attach the Prospect of Richmond's full response to the Pre-Publication draft Local Plan 2022 for reference in Annex 2 [See Appendix 12]. The Site Allocation numbering has changed in the current draft Local Plan by one (e.g. Site Allocation 26 is now 27). The 2022 response referred to Arup's Urban Design Study 2021 and Arup's Metropolitan Open Land Review Annex Report, which have both been updated in 2023. Our 2022 responses remain unchanged notwithstanding the updates of the Arup reports. Litchfield's Stage 1 Report in 2021 on Retail, Non-retail services and Leisure Floor space has been followed by a Stage 2 Report in 2023. Our response to Policy 18 contained detailed figures from the Stage 1 Report, which have now been updated. However, we have not revised our response as we do not believe the substance of our response to Policy 18 should change. Circumstances existing in January 2022 continue to evolve, especially in regard to Government Planning Policy but also in regard to policy drivers such as housing demand, economic, commercial and high street recovery from the pandemic.	



							<p>The pace of change makes it hard for a Local Plan to keep up. However, we are not suggesting any changes to the substance of the outstanding issues.</p> <p>We note and welcome the Council's responses to our representations <b>12, 58, 97, 141, 171, 214, 586 (first sentence only), 678, 795, 807, 878, 885, 952 and 1014.</b></p> <p>We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan - Publication Version for the reasons set out in our previously submitted comments: <b>213, 217, 241, 279, 586, 587, 588, 596, 597, 600, 603, 609, 616, 618, 619, 673, 805, 812, 865, 929, 1019, 1032, 1033 and the penultimate un-numbered item in the schedule.</b> [See comments 30, 40, 46, 73, 244, 252, 254, 256, 258, 264, 269, 272, 306, 395, 397, 428, 473, 504, and 518 added to this schedule]</p> <p>Given the substantial and undue reliance given in the Plan to Arup's Urban Design Study, 2021 (as updated in 2023) and to Arup's Metropolitan Open Land Annexe Report Review of 2021 (as updated in 2023), and the questionable aspects of the documents on which we commented critically in January, 2022, we would urge that the 2023 versions of both documents should be considered in detail by the Inspector in considering the Local Plan - Publication Version.</p> <p>We have given the Friends of Richmond Green permission to refer to and endorse this Prospect of Richmond response and we would be pleased to work with them in resolving the outstanding issues with the Council.</p>	
16	Katherine Drew, <b>The Royal Parks</b>	Local Plan Publication (Regulation 19) - June 2023 (general comment in relation to Royal Parks and the Habitats Regulation Assessment)					<p>In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again. In particular, we would urge you to reconsider a stand-alone Royal Parks policy, especially in light of TRP's status and designations. [See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 199 in relation to a stand-alone Royal Parks policy and capturing the value of development around the Parks; and comment 222 in relation to the Habitats Regulation Assessment in terms of Richmond Park SAC]</p>	
17	Suzanne Parkes, <b>Elmbridge Borough Council</b>	Duty to Cooperate			Yes		<p><b>Publication Local Plan (Regulation 19) - June 2023</b></p> <p>Thank you for consulting Elmbridge Borough Council (EBC) on your Publication Local Plan (Regulation 19) document. As a neighbouring authority, EBC is keen to continue working with the London Borough of Richmond upon Thames (LBRT) to ensure the delivery of our respective Local Plans.</p> <p>In responding to this consultation, the Council has focused its response on the strategic policies that will, and / or are likely, to have cross-boundary implications for our borough and have been the subject of our on-going collaboration under the Duty to Cooperate. Our response also refers to the evidence base that has been prepared to inform and support these policies where appropriate.</p> <p><b>Duty to Cooperate</b></p> <p>Regarding the Duty to Cooperate, I can confirm that our authorities have engaged with one another to discuss cross-boundary strategic matters throughout the preparation of our respective (draft) Local Plans. This has included engagement on our evidence base documents, through officer meetings, and at our Regulation 18 and 19 stages. It is noted that our Duty to Cooperate activities up until our respective Regulation 19 stages are recorded within EBC's Duty to Cooperate, Statement of Compliance (June 2022) and LBRT's Duty to Cooperate Statement Richmond Local Plan (Regulation 19) (June 2023).</p> <p>EBC agrees that the above documents are an accurate record of engagement up until our respective Regulation 19 stages and raises no objections to LBRT's Publication Local Plan (Regulation 19) document on this ground. [See also comments 18, 64, 125, 347, 353, 496, and 528]</p>	
18	Suzanne Parkes, <b>Elmbridge Borough Council</b>	On-going collaboration & Statement of Common Ground					<p><b>On-going collaboration &amp; Statement of Common Ground</b></p> <p>As set out in our draft SoCG, EBC is committed to working positively together and welcomes our on-going collaboration as part of the preparation of our respective plans as we both head towards Submission and the Examination in Public stage.</p>	
19	Jonathan Blathwayt, GLA on behalf of <b>Mayor of London</b>	General Conformity	No	No	No	Consistent with national policy	<p>Thank you for consulting the Mayor of London on the Richmond Local Plan 'The best for our borough' Regulation 19 Consultation (the draft Plan). The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and are attached to this letter. [See comments under Richard Carr, <b>Transport for London (TfL)</b> in this schedule]</p> <p>The Mayor previously provided comments on the Richmond Local Plan Regulation 18 Consultation in January 2022 (Ref: LDF27/LDD12/LP02/JC01). This response follows on from the comments made in the previous consultation and they should be read alongside each other. The response sets out where amendments should be made for the draft Plan to be consistent with the London Plan 2021 (LP2021). The LP2021 was formally published in March 2021 and now forms part of London Borough of Richmond upon Thames' (LBRuT) Development Plan and contains the most up-to-date policies.</p> <p><b>General conformity</b></p>	

							All Development Plan Documents in London must be in general conformity with the London Plan under section 24(1)(b) of the Planning and Compulsory Purchase Act 2004. Policy 11 on affordable housing threshold approach as set out in the draft Plan is not in general conformity with Policy H4 of the LP2021 and will potentially result in fewer affordable homes being delivered in LBRuT across the plan period. More details on this are set out in the following sections. [See comments 55, 346, 367, 402, 445, 465, 514, and 521]	
20	Duncan McKane, <b>London Borough of Hounslow</b>	Local Plan Publication (Regulation 19) - June 2023 (general, Duty to Cooperate)					Thank you for providing the London Borough of Hounslow (LBH) with the opportunity to respond to the London Borough of Richmond upon Thames (LBRuT) Local Plan Publication (Regulation 19) Consultation. We are also grateful for the extension of time in order to allow us to liaise with our colleagues in the Transport Planning and Policy team before providing our response. LBH is broadly supportive of LBRuT's overall spatial strategy, including the focus on Living Locally and 20-minute neighbourhoods, but reluctantly raises a HOLDING OBJECTION to the Local Plan, pending publication and consideration of the further information LBRuT intends to publish in relation to the transport and highways impacts of the Plan. [See comments 82, 219, 348, 375, 403, 414, 447, and 522] We would welcome the opportunity to engage further on this and other strategic matters through continued duty to cooperate discussions in the coming months. Following this, LBH hope that we can agree positions with LBRuT relating to cross-boundary matters within a Statement of Common Ground at the earliest opportunity. We look forward to continuing to work together in preparing your new Local Plan. Please feel free to contact the Spatial Planning team by phone or email.	
21	Peter Willan and Paul Velluet, <b>Old Deer Park Working Group</b>	Local Plan Publication (Regulation 19) Urban Design Study (2023)					The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. This submission represents the joint response from the Group. The Group was formed in 2012 in recognition of the particular ecological, historical and recreational importance of the Old Deer Park and has since then worked for encouraging and securing the preparation of a coherent strategy for the effective conservation, development and management of the Park. In June, 2012, the Group published its report: The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset - A framework for conservation and enhancement. Since then, it has made a number of submissions to the Richmond upon Thames Council (Council) on related issues. In this connection and importantly, the Group worked collaboratively with the Council and its consultants on the preparation of the Old Deer Park Supplementary Planning Document (as published in March, 2018). The Group has also worked, and continues to work, collaboratively with the Council on the planning and implementation of projects for the enhancement of the Park, including the award-winning scheme for improvements at and adjacent to the Park Lane entrance to the Old Deer Park Car-park. The Group is currently working with the Council to link the Old Deer Park car park with the river Thames along the area between the A316 road and the railway. It is working with the Council on tree planting and with Thames Landscape Strategy in rewilding the ODP section of Thames Arcadia. <b>BASIS OF RESPONSE</b> The Group has examined the schedule of extracts from the Council's Consultation Statement of June 2023 detailing responses from the Group in January 2022 to the Pre-Publication draft Local Plan and the Council's responses. The schedule was prepared by the Council and emailed to the Group on 20 July 2023. The schedule is attached as Annex 1 [See Appendix 11]. We attach the Old Deer Park Working Group's full response to the Pre-Publication draft Local Plan 2022 for reference in Annex 2 [See Appendix 11]. The Site Allocation numbering has changed in the current draft Local Plan by one (e.g. Site Allocation 26 is now 27). The 2022 response referred to Arup's Urban Design Study 2021 and Arup's Metropolitan Open Land Review Annex Report, which have both been updated in 2023. Our 2022 responses remain unchanged notwithstanding the updates of the Arup reports. Circumstances existing in January 2022 continue to evolve, especially in regard to Government Planning Policy but also in regard to policy drivers such as housing demand, economic, commercial and high street recovery from the pandemic. The pace of change makes it hard for a Local Plan to keep up. However, we are not suggesting any changes to the substance of the outstanding issues. We note and welcome the Council's responses to our representations: <b>45, 86, 130, 163, 198, 215, 638, 679, 794, 879, 886, 927, 954, 955 and 1013.</b> We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan - Publication Version for the reasons set out in our previously submitted comments: <b>212, 218, 242, 278, 589, the un-numbered item between items 596 and 597, 620, 634, 674, 866, 930, 1018, 1034, 1035 and the final un-numbered item in the schedule.</b> [See comments 29, 41, 47, 72, 245, 273, 284, 307, 429, 474, 503, and 519 added to this schedule] Given the substantial and undue reliance given in the Plan to Arup's Urban Design Study, 2021 (as updated in 2023) and to Arup's Metropolitan Open Land Annexe Report Review of 2021 (as updated in 2023), and the questionable aspects of the documents on which we commented critically in January, 2022, we would urge that the 2023 versions of both documents should be considered in detail by the Inspector in considering the Local Plan - Publication Version.	
22	Henry Brown (The Planning Lab), <b>Royal</b>	Publication Local Plan (including changes to the	Yes	No	Yes	Effective; Consistent with	Royal Botanic Gardens, Kew (RBGK) is pleased to respond to the consultation on the Regulation 19 version of London Borough of Richmond's draft Local Plan. Our comments reflect those made in our detailed response to the Regulation 18 version in January/February 2022.	

	<b>Botanic Gardens Kew</b>	Policies Map designations) (general)				national policy	<p>LBRuT indicates that its preferred method for receiving comments to the consultation is electronically, using the standard representation form. RBGK has completed this and we attach a copy to this letter. [included in other comments within this schedule]</p> <p>In line with our response to the earlier consultation, RBGK remains broadly supportive of the overarching strategic vision set out in LBRuT's draft Local Plan, including the response to the climate emergency, retaining and improving biodiversity, and protecting heritage and culture. We welcome the opportunity to provide comments on draft versions of the Plan and are pleased to note a number of amendments are included in this latest draft that align with the suggestions we made in relation to the Regulation 18 version.</p> <p>However, a number of areas of concern remain and RBGK raises these again because we believe these cause the Plan to fail the tests of soundness. We do not repeat them in detail here, but in summary these concerns relate to:</p> <ul style="list-style-type: none"> <li>• The designation of Kew Gardens as an "incremental intensification area" and an "area deficient in public open space" in <b>Policy 2: Spatial Strategy, Managing Change in the Borough</b>. [See comment 69]</li> <li>• Clarification on how the identified views referenced in <b>Policy 31: Views and Vistas</b> have been assessed, and how it is intended to progress supporting policies (specifically, the draft Local Views SPD). [See comment 444]</li> <li>• Amendments to <b>Policy 32: Royal Botanic Gardens, Kew World Heritage Site</b> to ensure the correct balance can be struck between protecting, conserving, promoting and enhancing the RBG Kew WHS with regard to future development. [See comment 448]</li> <li>• Inconsistency in the description of permitted heights set out in <b>Policy 45: Tall and Mid-Rise Building Zones</b>. [See comment 513]</li> </ul> <p>RBGK urges LBRuT to consider our representations and implement the proposed amendments we have set out. If it would be helpful to discuss any of these concerns in more detail, or if we can be of further assistance in refining the amended wording in relation to any of these points, we would be very happy to do so.</p> <p>Thank you again for considering RBGK's comments; please do not hesitate to contact me if I can be of further assistance.</p>	
23	Summer Wong (RPS), <b>Notting Hill Genesis</b>	Publication Local Plan (general)	No	N	N	Positively Prepared; Justified; Effective; Consistent with national policy	<p><b>REPRESENTATION ON BEHALF OF NOTTING HILL GENESIS TO RICHMOND LOCAL PLAN PUBLICATION (REGULATION 19) CONSULTATION JULY 2023</b></p> <p>We act on behalf of our client Notting Hill Genesis, owners of the St Clare Business Park, Windmill Road, Hampton. Notting Hill Genesis is one of London's largest housing associations and registered providers of social housing. Their primary purpose is to provide homes for lower-income households in and around London. More than half of their homes are affordable housing tenure, alongside shared ownership, market sale and market rent, student accommodation, temporary housing, extra care and supported accommodation for the elderly, office space and retail units. Notting Hill Genesis are passionate and experienced at developing successful communities that will thrive for generations to come.</p> <p>Notting Hill Genesis is committed to deliver high quality mixed-use schemes with the continued provision of employment space and new residential dwellings including affordable housing at St Clare Business Park. A current application is under determination by the Council (ref: 22/2204/FUL) for the redevelopment of this site to provide 100 residential units and 1,885sqm of commercial floorspace in two new buildings of 2 to 5 storeys in height with associated landscaping, access and car parking.</p> <p>We set out below our comments and recommendations (in bold red text) below against the Richmond Local Plan Publication (Regulation 19) July 2023, in relation to the following policies:</p> <ul style="list-style-type: none"> <li>• Policy 4 Minimising Greenhouse gas Emissions and Promoting Energy Efficiency (Strategic Policy) [See comment 321]</li> <li>• Policy 6 Sustainability Construction Standards [See comment 328]</li> <li>• Policy 10 New Housing (Strategic Policy) [See comment 355]</li> <li>• Policy 11 Affordable Housing (Strategic Policy) [See comment 368]</li> <li>• Policy 21 Protecting the Local Economy (Strategic Policy) [See comment 406]</li> <li>• Policy 24 Industrial Land [See comment 412]</li> <li>• Policy 25 Affordable, Flexible and Managed Workspace - subject to viability [See comment 413]</li> <li>• Policy 39 Biodiversity and Geodiversity [See comment 486]</li> <li>• Policy 45 Tall and Mid-Rise Building Zones [See comment 517]</li> </ul> <p><b>Conclusion and Recommendation</b></p> <p>We trust the above representation to the Publication Richmond Local Plan (Regulation 19) July 2023 consultation will be fully taken into consideration by the Inspector, including the Recommended Amendments as set out above. We wish to be kept informed of the progress of the Local Plan. If you require any further information in the meantime, please do not hesitate to contact me.</p>	
24	Tim Catchpole, <b>Mortlake with East Sheen Society</b>	Publication Local Plan (general)					<p>Thank you for your notice of 9 June launching this document. We note your comment that "<i>at this stage of the plan-making process, in accordance with national guidance, consultation responses should focus on legal and procedural compliance, including the duty to co-operate, and the soundness of the Plan.</i>"</p> <p>In terms of the compliance including the duty to co-operate, we have no problems, we are impressed with the work you have done and you have allowed us to co-operate with you throughout – at the 'Direction of Travel' stage in spring 2020, the Prepublication stage in January 2022 and now at the Publication stage.</p> <p>In terms of the 'soundness' we note your four different tests on this (below in italics) and our comments are as follows: <i>The Local Plan has to be:</i></p>	

						<ul style="list-style-type: none"> <li>• <i>Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other authorities.</i> We agree with the strategy but would have expected it to lead directly to the policies and finally to the planning guidelines for the major development sites (the site allocations), this being the usual structure of all plans till now. However, the strategy instead leads to local strategies and thence to the site allocations followed by all the policies as if they were an appendix. We leave it to the Inspectorate to decide whether this break with tradition is acceptable. As for the agreements with the other authorities we leave this matter for those other authorities to comment on.</li> <li>• <i>Justified - It is based on an appropriate strategy, taking into account the reasonable alternatives, and is based on proportionate evidence.</i> We believe the strategy to be appropriate but are concerned about one aspect, namely the cumulative impact of all the development described in the site allocations. We are not sure that the traffic modelling evidence which has been relied upon is ‘proportionate’. Our area is divided by the South Circular Road which is highly congested and we believe much of the extraneous traffic is using the road because public transport alternatives for such orbital movement are clearly inadequate.</li> <li>• <i>Effective - It is deliverable over the plan period, and is based on effective joint working on cross-boundary strategic matters.</i> We believe the plan to be deliverable but have concerns about the joint working on cross-boundary strategic matters. This is evident in some of the plans in the document which show the Borough floating in a vacuum as if neighbouring boroughs do not exist, vis. Map 4.1 showing buffer zones around centres, Map 20 showing views and vistas and Map 21.1 showing open space deficiency. Conversely other plans do show the neighbouring boroughs, vis. Maps 4,2, 5.2, 17.1 and 25.1.</li> <li>• <i>Consistent with national policy - to enable the delivery of sustainable development.</i> We note that in para 2.4 “the Council will ensure that planning applications that accord with policies in the adopted Local Plan and the London Plan will be approved.” However, we are much concerned that some planning applications that do not accord with such policies are nevertheless being approved on the basis that “the benefits outweigh the harms.” The Local Plan does not – and ought to – provide an explanation of how such benefits and harms are measured. We have come across this problem several times in recent years, notably with the Homebase development on the edge of our area (SA29) which the Council refused but the Mayor is minded to approve, and with the Stag Brewery development (SA35) which the Council has approved and the Mayor in the past has refused. We hope these comments are helpful. We are grateful also for the responses you have made to all our comments at the Pre-publication stage. We accept most of your responses but there are a number that we do not agree with (see attached) and we will be raising these matters at the Inspectorate’s Examination in Public. [See comments 71, 297, 310, 349, 387, 419, 425, 443, 480, 502, 529, 542 and 548 in this schedule]</li> </ul>	
25	Rachel Holmes, Environment Agency	Local Plan Publication (Regulation 19)				<p>Thank you for consulting us on your draft local plan (Regulation 19) and the associated evidence base. We received consultation from you on 9 June 2023 and would like to provide comments with respect to our remit. We hope that you find our comments useful and we would be pleased to meet with you to discuss in more detail any issues or queries you may have.</p> <p><b>Environment Agency Position</b></p> <p>Our aim is to assist you prepare and implement a sound, robust, and effective plan that is reflective of national policy and your local evidence base. We hope that this collaborative process leads to a plan that delivers sustainable development, contributes to a stronger economy, and safeguards the environment for future generations. Our detailed comments are provided below [see comments in this schedule], following the general order of the topics presented in the draft local plan document. There are several policies with the plan that we consider unsound and have provided comments to support our position. In addition, we have provided recommendations to several policies that although do not affect the soundness of the plan, they could strengthen and maximise its effectiveness. Our detailed comments are attached below for your consideration. Please refer to the following sections (attached) for further information:</p> <ul style="list-style-type: none"> <li>• Section 1 – Environmental issues &amp; opportunities</li> <li>• Section 2 – Site allocations</li> <li>• Section 3 – Sustainability Appraisal &amp; Sequential Test Report</li> </ul> <p>Please do not hesitate to contact us should you have any queries.</p>	
26	Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common	General				<p><b>Summary</b></p> <p>Comments of the Reg19 version of the Local Plan are set out below in three sections:</p> <ol style="list-style-type: none"> <li>1. Section 23 - Reducing the need to travel and improving the choices for more sustainable travel;</li> <li>2. Section 17 - Delivering new homes and an affordable borough for all;</li> <li>3. Section 24 - Securing new social and community infrastructure to support a growing population; and</li> <li>4. Section 13 - Place Based Strategy for Mortlake &amp; East Sheen.</li> </ol> <p>Each section includes comments on the text, an explanation of why the comments have been made and a list of relevant NPPF, London and Local plan policies and other evidence that has been referred to. The comments on each section, although separate, are connected as they arise from an unwillingness by the administration to engage in discussion on the Local Plan about the unprecedented development in the East of the</p>	

						<p>Borough. This is possibly because the draft plan incorrectly forecasts a lower level of development than is anticipated. This has resulted in the cumulative impact of the four developments not being properly considered together. As a result, I would respectfully ask the Planning Inspector to consider if:</p> <ul style="list-style-type: none"> <li>• The current Transport Strategy, based on evidence over 5 years old, should be reviewed, as it is not based on up-to-date evidence as required by NPPF policy 31 and 33, and therefore is not sound, as required by NPPF policy 35.</li> <li>• The potential conflict of interest referred to in section 17, is consistent with national policy as required by NPPF policy 35d.</li> <li>• The amendments to the Education and Training Policy are consistent with national policy as required by NPPF policy 35d.</li> <li>• Chertsey Court should be included as a site allocation because the rejection of this site was not justified as required by NPPF policy 35b. Alternate proposals, which could enable the delivery of more sustainable development, were not considered properly.</li> </ul> <p>[See comments 76, 288, 299, 356, 364, 373, 379, 530, and 547]</p>	
27	Martha Bailey, <b>London Historic Parks and Gardens Trust</b>	General				<p>I write as a member of the Planning &amp; Conservation Working Group of the London Historic Parks &amp; Gardens Trust (trading as London Parks &amp; Gardens; LPG). LPG is affiliated to The Gardens Trust (TGT, formerly the Garden History Society and the Association of Gardens Trusts), which is a statutory consultee in respect of planning proposals affecting sites included in the Historic England (English Heritage) Register of Parks and Gardens of Special Historic Interest. LPG is the county gardens trust for Greater London. LPG makes observations on behalf of TGT in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the <a href="#">LPG's Inventory of Historic Spaces</a> and/or when included in the Greater London Historic Environment Register (GLHER). The Trust has compiled a list of sites in each borough, including Richmond, <a href="#">which can be accessed here</a>.</p> <p>The LPG inventory is compiled selectively with reference to criteria such as the preservation of historic landscapes and settings (both designed and natural), importance to local communities and the protection of wildlife and biodiversity. Many local green and open spaces are not designated heritage assets and are often at risk if not identified in Local Plans. We ask local authorities to include these spaces in their Local Plans and related policies to encourage protection of these precious historic landscapes which add character and improve well-being for everyone. LPG hopes its Inventory is used as a resource to inform supplementary planning documentation in the future.</p> <p>Please find enclosed our comments on the final draft of Richmond's Local Plan. [See other comments]</p>	
28	Jon Rowles	General including in relation to consultation and local needs, availability of evidence and Policies Map				<p>My main concerns are</p> <ul style="list-style-type: none"> <li>- The council has not followed the Statement of Community Involvement. The council created an easy-to-digest summary consultation document for the initial direction of travel stage, but not for the Regulation 18 or 19 consultations. There were around three webcasts explaining the process during the direction of travel stage, but only one online workshop about the limited topic, the future of our high streets (though duplicated for each town) later on, the council carried out outreach work for school children but does not appear to have done so for other hard-to-reach groups such as ethnic minorities or LGBT+. Therefore, I feel there needs to be another round of consultation with workshops on a range of issues and an easy-to-read summary along with outreach work with minority groups.</li> <li>- Some of the reports prepared for the evidence base were added very late in the Regulation 19 Consultation and the council has not made people aware they can comment upon them. I feel there should be another round of consultation and the council should specifically ask for comments on these documents.</li> <li>- The online policies map only went live in the last two weeks of the Regulation 19 consultation and even then, it doesn't work well and stops working if you try and apply multiple policies at once.</li> <li>- The 2023 Local Government Association Corporate Peer Challenge Report found that the council was focusing too much on Richmond and Twickenham and was failing to understand or plan for the needs of other less vocal communities and need to shape more localised plans. It also mentioned that concerns about the environment are overshadowing the needs of other groups <a href="https://www.local.gov.uk/our-support/council-assurance-and-peer-support/peer-challenges-we-offer/corporate-peer-challenge-82">https://www.local.gov.uk/our-support/council-assurance-and-peer-support/peer-challenges-we-offer/corporate-peer-challenge-82</a></li> </ul>	
29	Peter Willan and Paul Velluet, <b>Old Deer Park Working Group</b>	General (in relation to title of the Plan, page numbers)				<p>[See comment 21] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: 212...</p> <p>[See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 212 in relation to the title of the Plan and page numbers]</p>	
30	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	General (in relation to title of the Plan, page numbers)				<p>[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: 212...</p> <p>[See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 213 in relation to the title of the Plan and page numbers]</p>	

-	Introduction						
31	Katherine Drew, <b>The Royal Parks</b>	Introduction, paragraphs 2.33 and 2.39 – specific to biodiversity and the Royal Parks’ Environmental Designations)					In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again. [See Appendix 1, along with the <a href="#">Council’s Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 231 in relation to recognising the issues of air and light pollution]
32	James Stevens, <b>Home Builders Federation</b>	Introduction, Paragraph 2.1 (Local Plan period)					Paragraph 2.21 [reference is to paragraph 2.1] states that the new Local Plan will cover a period of 15 years from the date of its adoption. Assuming that adoption will be at some point in 2025, we assume that plan period will be 2025 to 2040? It would be helpful if eventually the plan period could be stated on the front cover of the Local Plan. The Council must clarify the plan period.
33	Joe Cunnane (Cunnane Town Planning), <b>Hampton Hill Residents</b>	2. Introduction, Setting the Scene (Page 5)	Yes	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<p><b>On Page 5.</b></p> <p><b>2 Introduction</b></p> <p><b>Setting the Scene</b></p> <p>Reference should also be made to the Localism Act 2011 which requires in Part 6 Chapter 4 Consultation that there is a ‘Duty to take account of responses to consultation’ [61X] (2) The person must, when deciding whether the application that the person is actually to make should be in the same terms as the proposed application, have regard to any responses to the consultation that the person has received. Also Part 1 Chapter 6 Predetermination</p> <p><b>Prior indications of view of a matter not to amount to predetermination etc</b></p> <p>(2) A decision-maker is not to be taken to have had, or to have appeared to have had, a closed mind when making the decision just because—</p> <p>(a) the decision-maker had previously done anything that directly or indirectly indicated what view the decision-maker took, or would or might take, in relation to a matter, and</p> <p>(b) the matter was relevant to the decision.</p> <p>The effect is to make clear it legally acceptable for persons deciding planning applications to confer with persons living in the vicinity of them. Contrary to the leader of the Council’s assertion:  <i>....that there are protocols in place which prevent our taking an active interest and you may inadvertently lobby a member of the committee who will decide [an] application.</i></p>
34	John Webb	2. Introduction (page 5 para 2.5)		No	No	Positively Prepared; Justified; Consistent with national policy	<p><b>On Page 5.</b></p> <p><b>2 Introduction</b></p> <p><b>Setting the Scene</b></p> <p>Reference should also be made in 2.5 to the Localism Act 2011 which requires in Part 6 Chapter 4 Consultation: that there is a ‘Duty to take account of responses to consultation’ [61X]</p> <p>The Act requires: (2) The person must, when deciding whether the application that the person is actually to make should be in the same terms as the proposed application, have regard to any responses to the consultation that the person has received.</p> <p>Also Part 1 Chapter 6 Predetermination emphasises:</p> <p><b>Prior indications of view of a matter not to amount to predetermination etc</b></p> <p>(2) A decision-maker is not to be taken to have had, or to have appeared to have had, a closed mind when making the decision just because—</p> <p>(a) the decision-maker had previously done anything that directly or indirectly indicated what view the decision-maker took, or would or might take, in relation to a matter, and</p> <p>(b) the matter was relevant to the decision.</p> <p>The effect is to make clear it legally acceptable for persons deciding planning applications to confer with persons living in the vicinity of them. Contrary to the Leader of the Council’s assertion:  <i>.... there are protocols in place which prevent our taking an active interest and you may inadvertently lobby a member of the committee who will decide [an] application.</i></p> <p>[See also comment 107 in relation to St Clare mid-rise zone]</p>
35	Jon Rowles	Twickenham Area Action Plan (2013) – guidance for Twickenham					- Central Twickenham does not have any 'Village Planning SPD' as it had an area action plan instead. However, the council plans to retire the action plan when the new plan is adopted and this will result in central Twickenham having fewer protections for its urban environment than the rest of the borough. I feel the council needs to commit to commissioning a new village planning SPD for central Twickenham or a replacement Area Action Plan.
36	Zoe Chick, <b>River Thames Scheme</b>	General, Policies Map Changes					<p><b>Introduction</b></p> <p>Please find enclosed representations to the Regulation 19 Draft Richmond Local Plan consultation on behalf of the River Thames Scheme (RTS). Our comments are provided below, following the general order of the topics presented in the Regulation 19 Draft Richmond Local Plan document.</p>

The RTS requests that the proposed upgrades to Molesey Weir and Teddington Weir which are located within the London Borough of Richmond upon Thames are presented on your Policies map. We will share a shapefile so this can be added. [Mapping details provided separately]



The RTS is making a representation as the following elements of the RTS are proposed within the London Borough of Richmond upon Thames:

- Upgrades to Molesey Weir
- Upgrades to Teddington Weir

Where we wish to see policies strengthened, we have outlined the additional content we would like included in the form of recommendations that would benefit the RTS project. We have also referenced the relevant sections and policy numbers for ease of navigating our response. There are also policies that we support and we welcome the references to the RTS in the Infrastructure Delivery Plan 2023.

We note that consultation responses should focus on legal and procedural compliance, including the duty to cooperate, and the soundness of the Plan. The RTS does not consider, for the sections we have made representations on, that there is anything that is not legally compliant, but we consider that our proposed changes are required to make the Draft Local Plan effective in delivering joint working on cross-boundary strategic priorities, and therefore sound.

**RTS Background**

The RTS is a multi-agency partnership, being led jointly by the Environment Agency and Surrey County Council. The RTS represents a new landscape-based approach to creating healthier, more resilient, and more sustainable communities. The RTS will be an integrated scheme which responds to the challenges of flooding; creating more access to green open spaces and sustainable travel routes, in addition to encouraging inclusive economic growth, increasing biodiversity and responding to the dual challenges of climate change and nature recovery.

The River Thames between Egham and Teddington runs through the largest area of developed undefended flood plain in England. In addition to the towns and villages in this area, the landscape has been heavily shaped by major infrastructure and extensive mineral workings. This has resulted in an area in which many homes and businesses are at risk of flooding, within a landscape which suffers from visual barriers and physical constraints which means the open space isn't used to its full potential.

The RTS will address these challenges to help create a sustainable, thriving and healthy community and promote inclusive economic growth. The RTS will reduce the risk of flooding to thousands of homes, businesses and vital infrastructure; it will create new areas of green open spaces with recreational facilities and connections to wildlife and it will provide sustainable travel connections to link it all together and create an improved resource for communities to enjoy.

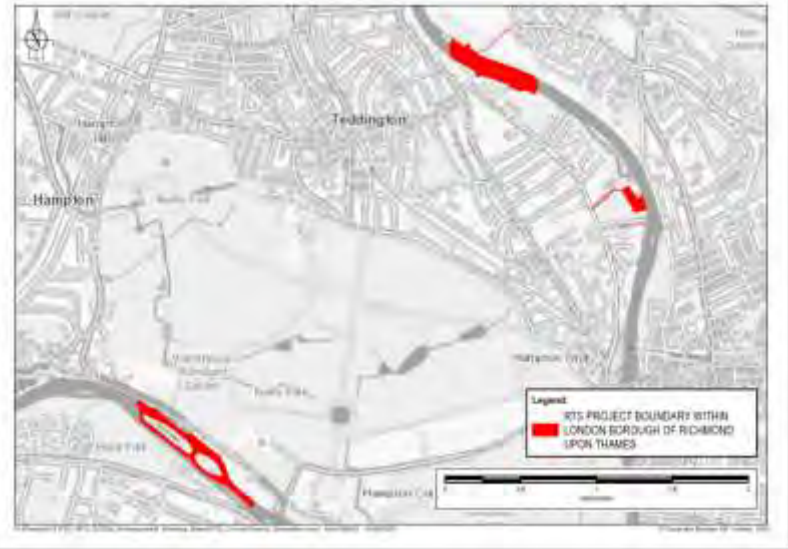
As an integrated Scheme, the RTS will deliver:

- A new river channel built in two sections – one section through Runnymede (between Egham Hythe and Chertsey) and one through Spelthorne (between Littleton North lake and the Desborough Cut)
- Capacity increases downstream of the Desborough Cut and the weirs at Sunbury, Molesey and Teddington
- Improved access to quality green open space and connections with wildlife, in addition to supporting a more sustainable travel network
- A network of high-quality habitat to achieve a biodiversity net gain.

Figure 1 below presents the current proposed location of the new river channel and the weir capacity improvements. The large scale of the project means the government has directed it should be treated as a project of national significance under the Planning Act 2008. These projects require a type of consent known as a 'Development Consent Order' (DCO) and we are currently in the pre-application stage.

It should be noted that there is a clear separation of responsibilities and an ethical wall in place between the officers promoting the River Thames Scheme on behalf of the applicant and the officers who will perform a regulatory function as part of the Planning Act 2008 process within Surrey County Council and the Environment Agency.

Figure 1: River Thames Scheme diagram



[See comments 70, 313 and 335 on Policies 2, 3, and 8]

**Section 3 – Sustainability Appraisal & Sequential Test Report**

We welcome to amendments to the summary section to reference the natural environmental features raised as requested in our response.

We commented on a number of objectives and for SA Objective: Adapt to the effect of climate change disagreed with the conclusion that it has both a neutral or uncertain effect. In response, it was stated that the nature of the Sustainability Appraisal means that the assessment of specific SA objectives and policies is broad, and it is considered difficult to separate where specific effects have not been accurately predicted as the assessment takes a much broader consideration, to form an overall score. We do agree that with regards to flood risk it is difficult to identify specific effects without detailed information on the specific proposal. We consider, for example the SFRA contains appropriate

37	Rachel Holmes, Environment Agency	Sustainability Appraisal & Sequential Test Report
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						recommendations to ensure development is designed to minimise and mitigate flood risk where appropriate to ensure it complies with the Local Plan and NPPF.	
-	Alan Smith					[See comment 332 in relation to flood risk and the Sustainability Appraisal]	
38	Max Lankester, Friends of Richmond Park	Habitat Regulations Assessment				<p>The following representation is made on behalf of The Friends of Richmond Park (Charity number 1133201). The representation is limited to the April 2023 version of the Habitat Regulations Assessment prepared by LUC, and relates to the assessment of air pollution on the Richmond Park Special Area of Conservation.</p> <p><u>What the Assessment says</u></p> <p>Paragraph 4.35 notes that air pollution from roads is unlikely to be significant beyond 200 metres. At paragraph 4.38 LUC makes the assumption that only A roads and motorways (ie the 'primary road network') are likely to experience any significant increase in vehicle traffic as a result of development; all other roads are therefore ignored.</p> <p>Paragraph 4.43 identifies the A307 (the Kingston to Richmond road) and the A308 (Kingston Hill) as being within 200 metres of the SAC.</p> <p>Accordingly, in the assessment of the Richmond Park SAC between paragraphs 4.53 and 4.56, all air pollution impacts so far as the SAC is concerned are screened out on the basis that the potentially affected areas (using LUC's assumption) are not known to be stag beetle habitats.</p> <p><u>Comment</u></p> <p>Although the roads within Richmond Park are Crown Roads, and are not part of the primary road network, they are highly susceptible to an increase in traffic generated by development. The road between Richmond Gate and Roehampton Gate is open to vehicular traffic during daylight hours on five days per week, and the road between Richmond Gate and Kingston Gate is open during daylight hours seven days per week. The limitation expressed by LUC in paragraph 4.38 - namely that '<i>only those roads forming part of the primary road network (motorways and 'A' roads) might be likely to experience any significant increases in vehicle traffic as a result of development</i>' - is candidly stated to be an assumption, but no reason or justification is given as to why such an extraordinary assumption can be made. Inclusion of the relevant Crown Roads, which we regard as being necessary, would result a proper assessment having to be made of the land within 200 metres of all relevant roads. The percentages of the SAC recorded at paragraph 4.53, which relate only to the A307 and A308, are clearly a long way short of the true figures.</p>	
39	Jo Edwards, Sport England	Evidence Base, Paragraph 2.18				note that it is intended to update the Indoor Sports Facility in 2023. Sport England would request details of the timetable for this work.	
40	Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to evidence base)				<p>[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 217...</p> <p>[See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 217 in relation to the evidence base – the Urban Design Study and the MOL Review]</p>	
41	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to evidence base)				<p>[See comment 21] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: 218...</p> <p>[See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 218 in relation to the evidence base – the Urban Design Study and the MOL Review]</p>	
42	Claire Wilmot	Strategic Context and Trends, Paragraph 2.31				Mixed use development should be used more frequently so that areas are utilising the same things eg. A shop uses power to heat the area during the day, the area above is residential and that uses the heat during the evening. Maintenance is shared parking if essential has two uses.	
43	Rachel Holmes, Environment Agency	Introduction Chapter 'Responding to a changing environment' (Paragraph 2.33 to 2.40)				<p><b>Section 1 – Environmental Issues &amp; Opportunities</b></p> <p>This section will cover the following environmental issues and opportunities:</p> <ul style="list-style-type: none"> <li>• Flood Risk</li> <li>• Biodiversity</li> <li>• Water Resources and Quality</li> <li>• Land Contamination</li> <li>• Waste Management</li> </ul> <p><b>1. Flood Risk</b></p> <p><b>Introduction Chapter 'Responding to a changing environment' (Paragraph 2.33 to 2.40)</b></p> <p>In our Regulation 18 response, we recommended that the Thames Estuary 2100 (TE2100) Plan was referenced earlier on in the Local Plan, potentially within the 'Responding to a changing environment' introduction chapter, however this</p>	



						recommendation has not been taken forward as part of the Regulation 19 Local Plan. Row 233 of your 'Statement of Consultation – Local Plan' (dated June 2023) provides justification for not progressing with this recommendation. We are satisfied with this reasoning and content that the TE2100 Plan is referenced elsewhere within the Local Plan.	
44	Claire Wilmot	Strategic Context and Trends, Paragraph 2.35				Heat pumps are incredibly difficult in an area such as this in that there isn't the space to install it and the efficiency isn't validated yet. More encouragement for external and internal insulation, use of water butts for saving water/gardens (this should be compulsory), grey water usage on all new builds	
45	Claire Wilmot	Strategic Context and Trends, Paragraph 2.37				This is critical as if we can encourage more exercise within these areas then health and long-term benefits are apparent. The number of people that have embraced wild swimming (Over a 1000 - Teddington Bluetits) is proof of those that many residents are embracing their local area in new ways	
46	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	Paragraphs 2.44 and 2.45, in relation to Heathrow				[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 241... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 241 in relation to Heathrow]	
47	Peter Willan and Paul Velluet, <b>Old Deer Park Working Group</b>	Paragraphs 2.44 and 2.45, in relation to Heathrow				[See comment 21] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: 242... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 242 in relation to Heathrow]	
48	Claire Wilmot	Heathrow, Paragraph 2.43				Heathrow stated that they have reduced their noise pollution since 2006 whereas due to flights being more frequent and flying at lower altitudes this is a blatant lie. The flights are being encouraged to fly over much closer flight paths in more defined routes which blight those under. Other airports have made it compulsory for airlines to use steeper take-offs (Brussels) or not allow late take offs (Sydney).	
49	Claire Wilmot	Heathrow, Paragraph 2.44				Completely support this stance	
-						<b>Vision and Strategic Objectives</b>	
50	Luke Burroughs, <b>Transport Trading Limited Properties Limited (TTLP)</b>	Publication Local Plan (general, strategic vision)				Thank you for providing the opportunity for Transport Trading Limited Properties Limited (TTLP) to comment on Draft Local Plan (Regulation 19) Consultation. Please note that the views expressed in this letter are those of TTLP in its capacity as a significant landowner and developer only, and do not form part of the Transport for London (TfL) corporate / statutory response. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties. <b>Transport Trading Limited Properties Limited (TTLP)</b> TfL owns around 5,700 acres of land across London and some of the surrounding boroughs, including buildings, land attached to tube, railway and bus stations, highways and worksites. TfL has set up a dedicated commercial property company, Transport Trading Limited Properties Limited (TTLP), to deliver housing in high demand areas and provide an increased revenue stream, and also to manage its commercial estate and undertake other development projects. TfL has land ownership within site allocations 15 Station Yard and 19 Fulwell Bus Garage. <b>Local Plan Strategic Vision 'The best for our borough'</b> TTLP broadly supports Richmond's strategic vision for the borough. We are particularly supportive of the strategic objective to meet housing targets set out in the London Plan and to <i>"maximise delivery of genuinely affordable housing across the borough"</i> TTLP is committed to optimizing development on appropriate sites in the borough and providing the maximum amount of affordable housing that these sites will enable. We are also supportive of the borough's commitment to <i>"Provide a clear pathway to zero- carbon for all types of new development, to minimise and mitigate the effects of climate change by requiring high levels of sustainable design and construction including reductions in carbon emissions"</i> . TfL has recently published its sustainable development framework which aims to maximise social, environmental, and economic sustainability on TfL development across London.	
51	Rachel Holmes,	Vision and Strategic Objectives				<b>Vision and Strategic Objectives Chapter - Local Plan Strategic Vision 'The best for our borough'</b>	

	Environment Agency						<p>We welcome that, in line with our Regulation 18 consultation response recommendation, reducing flood risk has been incorporated into the 'Local Plan Strategic Vision – The best for our borough' as part of Section 3 Vision and Strategic Objectives of the Regulation 19 Local Plan.</p> <p><b>Vision and Strategic Objectives Chapter – 'Increasing biodiversity and the quality of our green and blue spaces, and greening the borough'</b></p> <p>We welcome that, in line with our Regulation 18 consultation response recommendation, a referenced to flood storage has been made within 'Increasing biodiversity and the quality of our green and blue spaces, and greening the borough' as part of Section 3.3 Strategic Objectives of the Regulation 19 Local Plan.</p> <p><b>Vision and Strategic Objectives Chapter - Improving design, delivering beautiful buildings and high-quality places</b></p> <p>We welcome that, in line with our Regulation 18 consultation response recommendation, a reference to buildings being resilient to climate change has been made within the 'Improving design, delivering beautiful buildings and high-quality places' as part of Section 3.3 Strategic Objectives of the Regulation 19 Local Plan.</p> <p><b>Strategic Objectives</b></p> <p><b>Responding to the climate emergency and taking action</b></p> <p>In our comments on this policy in our Regulation 18 response we noted that the second bullet point under this strategic objective should consider using Nature Flood Management (NFM) techniques where possible, with a focus given to the protection and enhancement of rivers and river corridors, the re-naturalisation of rivers, encouraging soft-engineering approaches to riverbank protection, and the incorporation of an undeveloped buffer zone.</p> <p>We recommend that this bullet point is aligned with the requirements under the Water Framework Directive (WFD), and reiterate that it is the statutory duty of Local Authorities to deliver WFD objectives under the <a href="#">Water Environment Regulations (2017)</a>.</p>	
52	Louise Fluker, The Richmond Society	Strategic Vision 'The best for our borough', Para 3.2		No		Justified	<p>The Strategic Vision refers to the 20 minute community with everything in reach within 20 mins of either walking or cycling. However there is a significant difference between the distance travelled by a cyclist and a pedestrian. The draft Plan should be clearer as to what is meant. The point is significant because the evidence referred to states that Richmond has an ageing population. The elderly or those with mobility issues may not be physically able to walk let alone cycle</p>	This is a matter of clarification - i.e. the text should refer either to 20 minutes walking or 20 minutes cycling
53	Louise Fluker, The Richmond Society	Strategic Objectives, Para 3.3 (last bullet point on page 15 of the Plan)	Yes	No	Yes	Justified	<p>3.3 Create 20-minute neighbourhoods that make it easier to be physically active; enhance opportunities for walking and cycling safely; create high quality public spaces and public realm; improve connectivity and accessibility for all; and focus on supporting the high streets, centres and parades as destinations that people want to go to and use to 'live locally'</p> <p>Whilst the emphasis on encouraging fitness is laudable, the strategic objective ignores (a) the evidence cited by the Council of an ageing population (b) elderly people tend to have greater mobility issues and (c) are therefore unlikely to be able to walk within a 20 minute cycle ride, let alone cycle!</p>	Include after " improve connectivity and accessibility for all" the words "including those with mobility issues"
-							<b>Policy 1. Living Locally and the 20-minute neighbourhood (Strategic Policy)</b>	
54	Gary Haggren	Policy 1 Living Locally and the 20-minute neighbourhood	No	No	No	Justified; Positively Prepared	<p>20 minute neighbourhood policy is an experiment which has a vast impact on everyones lives. I find it very concerning that that has not been publicised by Richmond council. Why would you not have a full consultation on this overreaching egregious policy?</p> <p>This should not go ahead without a full public consultation</p>	
55	Jonathan Blathwayt, GLA on behalf of Mayor of London	Spatial Strategy		Yes			<p>The "live locally" objective as set out in Policy 1 which will reduce the need to use private cars and strengthen the role of town centres fits in with the Good Growth objectives set out in the LP2021. The Mayor welcomes the overarching spatial strategy of the draft Plan to focus development around the existing town centres of East Sheen, Twickenham, Whitton, Teddington and Richmond.</p>	
56	Louise Fluker, The Richmond Society	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy), Paras 1,2 and 3	Yes	No	Yes	Justified	<p>The draft Plan ignores in a practical way the needs of residents or visitors who are not mobile (thus ignoring the point also made in the Plan that the borough's population is ageing). Someone in a wheelchair can neither cycle nor walk and even using public transport is difficult. Likewise some people with mobility issues may not be eligible for a blue badge. There is no acknowledgment that such persons might need to drive or be driven</p>	In Policy 1B add at the end " with adequate provision for those with mobility issues"
57	Julie Scurr	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy)					<p><b>20 minute neighbourhood:</b> if you are committed to this policy/vision and increasing the number of trips made by bicycle you need to considerably increase safe cycle routes across the whole borough and, most importantly, create safe cycle parking – I am sure residents would be happy to pay a small fee for parking their cycles somewhere where they know they will still be there when they come back. I could cycle to Richmond, but choose not to as I don't believe my cycle would be safe whilst I did my shopping/got a coffee. Based on the current guidance, I would have to carry very heavy locks with me and probably more than one, although that would not stop someone from stealing my saddle or handlebars!</p>	
58	John Sadler, CPRE London	Policy 1 Living Locally and		No		Positively Prepared;	<p>This concept, as defined, needs to be brought in line with good practice or it will not incentivise local living and reduce car-use. Specifically, the borough defines 20-minute neighbourhoods as twenty minutes one way on foot or cycle, but</p>	

		the 20-minute neighbourhood (Strategic Policy)				Justified; Effective	<p>the appropriate definition (appropriate to encouraging local life and active travel in order to reduce car trips etc), defines it as 10-minutes on the outward leg and 10-minutes back, by foot.</p> <ul style="list-style-type: none"> <li>• The policy should be re-defined as meaning 10-minutes walk to and 10-minutes walk from.</li> <li>• More is needed to set out what services are needed and what new hubs need to be set up to create genuine twenty-minute neighbourhoods.</li> <li>• More is needed on how to link walking / cycling to the rail/tube network i.e. secure cycle storage by all stations.</li> <li>• <b>Freeing up 'grey space' / promoting the visitor economy.</b> Creating a Low Traffic Richmond, including closing Richmond Bridge to cars (leaving it open for buses, cycles, pedestrians) would promote the visitor economy AND land could be reclaimed from e.g. A306 gyratory and elsewhere. More generally, LTNs at Barnes/Mortlake (particularly the riverside), as well as Kew, could also enable the borough to reclaim 'grey space' and reallocate it for vital active-travel and green infrastructure.</li> <li>• <b>More could be done generally to link action on car-use to spatial planning</b> (e.g. eliminating surface and multi-storey car parks; and introducing LTNs, even closing Richmond Bridge) to the ability to reclaim grey space for active travel and green infrastructure - <b>and to include this as a central plank of spatial planning in the borough.</b></li> </ul>	
59	Olivia Russell (CBRE), Rugby Football Union (RFU)	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy)	Yes	No	Yes	Justified; Consistent with national policy	<p><b>Policy 1 (Living Locally)</b></p> <p>Through Regulation 18 Draft Local Plan representations, the RFU expressed support for the 'living locally' approach for access to essential services to fulfil daily needs, to reduce urban carbon emissions and biodiversity loss, however raised concern regarding the potential of this policy to limit movement and restrict journeys in the case of visitor attractions such as Twickenham Stadium.</p> <p>In the Council's Statement of Consultation (June 2023), it was noted that additional supporting text detailing the expectations for how applications will demonstrate compliance with the policy would be added. This has been added at para. 4.16, and this text acknowledges that application of this policy is proportionate to the scale and type of development. This is welcomed by the RFU, in the context of Twickenham Stadium.</p> <p>The Regulation 19 Local Plan also includes an information note, confirming this policy is not seeking to restrict journeys, which is welcomed.</p> <p>The ambitions of the RFU respond to the objectives of this policy, for example seeking to encourage cycling and use sustainable transport modes through transport improvements, prioritising access and inclusivity at the Stadium, facilitating a thriving local economy, and creating high-quality green infrastructure and public realm.</p>	
60	Martha Bailey, London Historic Parks and Gardens Trust	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy)					<p>B. The 'living locally' concept will be achieved by:</p> <ol style="list-style-type: none"> <li>1. giving people the ability to meet most of their daily needs, through a mixed pattern of land uses including food and necessities, within a 20-minute walk from home, with safe cycling and local public transport options;</li> <li>2. facilitating access to quality public transport that connects people to jobs and other places they need to go to, especially improving inclusive access and overcoming barriers for people who experience reduced mobility;</li> <li>3. promoting and enabling healthier lifestyles and active living by improving walking and cycling infrastructure to achieve the borough's target of 75% of trips being undertaken by walking, cycling and public transport;</li> <li>4. offering a high-quality public realm and open spaces;</li> <li>5. delivering new developments at densities that make local services and transport viable;</li> <li>6. improving accessibility and connectivity of green infrastructure;</li> <li>7. facilitating thriving local economies; 8. following the Mayor's Healthy Streets Approach to ensure walking and cycling are the natural choices for local journeys, and using the Healthy Streets Toolkit to assess new infrastructure schemes.</li> </ol> <p>C. All development (except householder applications for alterations) should:</p> <ol style="list-style-type: none"> <li>1. demonstrate how they will deliver improvements that support the 'living locally' concept;</li> <li>2. be permeable by foot and cycle, with good connections and signage to local walking and cycling routes/networks as well as public transport;</li> <li>3. demonstrate that future occupiers of the development are able to meet their shopping, work, recreational and cultural needs within a 20-minute walk or cycle and how the new development will contribute to sustaining the 'living locally' concept;</li> <li>4. demonstrate that the proposals will not lead to any deterioration in the provision of, and access to, services to meet shopping, work, recreational and cultural needs for local communities;</li> <li>5. demonstrate how a proposal will reduce the dominance of vehicles. Major developments of 10 or more residential units or non-residential development of 500sqm of floorspace or more</li> <li>6. must demonstrate how the proposal will improve local walking and cycling routes, including accessibility to the existing network, in areas with lower levels of public transport accessibility or higher levels of health deprivation and disability.</li> </ol>	After point 2. please consider adding a further point; '3. protect and enhance existing open space in the borough.' This marries with the commitment to 'offering a high-quality public realm and open spaces' as set out in point 4. above.
61	Philip Villars, PMV Planning Limited on behalf of owner of Arlington Works	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy)		No			<p><b>Policy 1: Living Locally and the 20-minute neighbourhood</b></p> <p>The Arlington Works site is within a short walk of the local centre of St Margarets and other local facilities such as parks, train and bus services. The Arlington Works site has the potential to positively contribute towards the 20-minute neighbourhood of St Margarets.</p>	

62	Craig Hatton, <b>Network Rail (Southern)</b>	Policy 1 - Living Locally and the 20-minute neighbourhood					<p>Thank you for providing Network Rail (Southern) the opportunity to make comment on the pre-submission version (Regulation 19) of the Local Plan. It is important that the policies within the Local Plan reflect the aspirations of Network Rail and the wider rail industry as far as possible, and that the Plan provides suitable flexibility to support future growth of the railway for both passenger and freight services. The railway network is a vital element of the country's economy and a key component in the drive to deliver the Government's sustainable agenda.</p> <p>In addition, Network Rail is a statutory undertaker responsible for maintaining, operating and developing the main railway network and its associated estate. Our aim is to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will also need to be carefully considered.</p> <p>Network Rail is a statutory consultee for any planning applications proposing development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway. It is important that policies within the plan acknowledge the need for the impact of new development to be assessed and mitigated, both on an individual site by site basis, as well as the cumulative impact of multiple site allocations and/or windfall sites brought forward in the plan period. Within the plan area, there are several level crossings in the Borough, some of which are impacted upon by proposed site allocations.</p> <p>The following comments are designed to help strengthen the policies within the Richmond Local Plan and their ability to deliver our objectives. [See other comments in this schedule - on the place-based strategies and site allocations 186, 208, 218, 242, 251, 262, 267, 271, 290, 296 and 304 and comment 525 on Policy 47]</p> <p><b>Policy 1</b> Network Rail supports the strategy to encourage 20-minute neighbourhoods and for people to use public transport. Point 2 of the Policy indicates a desire to improve access to public transport and for those who have mobility issues. Network Rail supports this however we do not believe the Plan goes far enough in addressing these matters fully. There are twelve mainline rail stations across the Borough and Richmond supports a huge part of the rail network into and out of London. Network Rail believe that the Plan should better support the rail network in the subsequent Policies to reflect the aspirations of Policy 1.</p>	
63	Jo Edwards, <b>Sport England</b>	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy),					support, consistent with Sport England's Active Design Guidance	
64	Suzanne Parkes, <b>Elmbridge Borough Council</b>	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy), Policy 2 Spatial Strategy: Managing change in the borough (Strategic Policy)		Yes			<p><b>Policy 1 – Living Locally and the 20-minute neighbourhood</b> <b>Policy 2 – Spatial Strategy: Managing change in the borough</b> EBC's supports these policies that set out the overarching direction for how the LBRT is expected to evolve and how growth will be managed taking into account the Strategic Vision 2039 and the Strategic Objectives. Many of the Strategic Objectives reflect EBC's guiding principles as set out in its draft Local Plan (June 2022) including for example, its place-making led approach to managing growth and seeking to tackle the climate change emergency.</p>	
65	Jon Rowles	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy)					- It is highly disappointing that the council is not adopting the standard definition of twenty-minute neighbourhoods. It also needs to take into consideration the needs of the less physically mobile and ensure that disabled people and the elderly are not unjustly disadvantaged.	
66	Elena Mikhaylova	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy)	No	No	No	Positively Prepared; Effective; Justified; Consistent with national policy	As per above [See general comment 1], this this policy is a direct breach of Human freedoms and the council including specific individuals who are looking to push this policy forward will be taken to court if any restrictions to residents' freedom of movement will be implemented. As I already mentioned, the Council is now under investigation by the local residents to establish whether there has been an embezzlement of public funds and which organisations and individuals benefit from restriction of residents' freedoms and human rights. Further actions will be taken against those engaged in such breaches and violations	All policies mentioned in my comments above must be cancelled immediately.
67	Gary Haggren	Paragraph 4.1	No	No	No	Positively Prepared; Justified	Very concerned you are pushing through this 20 minute control state through the back door - this has NOT been widely published. A full and sepoerate consultation is needed. Very strongly disagree with this totalitarian control scheme	

68	Louise Fluker, <b>The Richmond Society</b>	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy), Paragraph 4.13	Yes	No	Yes	Justified	Again the Plan does not make provision for those less mobile people who have no alternative but to drive or be driven	Amend the second sentence to read: "Development proposals should contribute to increasing accessibility of these centres by foot, bike, and public transport, thus reducing dependency on car use except for those who have mobility issues"
-							<b>Policy 2: Spatial Strategy: Managing change in the borough</b>	
69	Henry Brown (The Planning Lab), <b>Royal Botanic Gardens Kew</b>	Policy 2: Spatial Strategy: Managing change in the borough	Yes	No	Yes	Effective; Consistent with national policy	RBGK welcomes the opportunity to comment on the latest iteration of the Local Plan. However, believes the draft Plan would fail the test of soundness in a number of places. The issues identified below were mostly raised by RBGK during the last consultation phase (Reg 18, date) and are summarised as follows: <u>Policy 2: Spatial Strategy: Managing change in the borough</u> The "key diagram" on page 26 continues to designate a large proportion of Kew Gardens as an "incremental intensification area", as well as an "area deficient in public open space", which seems contradictory and at odds with the character and nature of the locality. While we would support the protection and enhancement of public open space surrounding Kew Gardens, we reiterate that the Royal Botanic Gardens at Kew is a World Heritage Site; located in a Conservation Area; registered as a Grade I Registered Park and Garden of Special Historic Interest; and manages a total of forty-six listed buildings and structures. It provides approximately 300 acres of open space and gardens, and is heavily protected in policy terms. While we understand that the current boundaries of the incremental intensification areas have been drawn based on PTAL and proximity to stations and town centres, RBGK is concerned that the inclusion of Kew Gardens and surrounding streets could lead to an intensification of development which would harm its heritage value. This approach is not compliant with London Plan Policy HC1 which states that the cumulative impacts of incremental change from development on heritage assets and their settings should be actively managed. While RBGK must maintain some flexibility for appropriate and justified development to support its primary visitor and research function, this designation also appears to contradict the Urban Design Study (2023) undertaken by Arup which confirms that Kew Gardens and Riverside has a high sensitivity to change, and that the area's high value and susceptibility mean that significant change is unlikely to be appropriate. RBGK request that both of these designations are reassessed, or their relevance to how they should be applied to the immediate area surrounding the Gardens be clarified in the policy text. Without such modifications, the Plan may facilitate inappropriate development in this area, which would otherwise be incompatible with the aims of the Plan and may adversely affect the Gardens and its WHS status. We consider that with these minor amendments set out above this policy could be made sound.	See Section 6, above
70	Zoe Chick, <b>River Thames Scheme</b>	Policy 2 Spatial Strategy: Managing change in the borough					The RTS supports this policy, particularly part C which states: ' <i>Development in the borough will promote the provision of green infrastructure that creates resilience and helps mitigate the impacts of climate change, and protect and, where possible, enhance the environment, local character and heritage assets...</i> '	<b>Recommended action:</b> For information only, no action required.
71	Tim Catchpole, <b>Mortlake with East Sheen Society</b>	Policy 2 Spatial Strategy: Managing change in the borough					<b>Policy 2. Spatial Strategy: managing change in the borough (strategic).</b> [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 201 in relation to the structure of the Plan, comment 274 in relation to Policy 2, and comment 569 and 644 in relation to the place-based strategies.] As previously indicated, we agree with the logic but note that it then leads into the spatial strategies for the nine distinct areas of the Borough and we wonder why these appear upfront and not at the end of the document. Previous Local Plans have started with the strategic policies and then moved to the development sites at the end. We appreciate that local spatial strategies are important but that the correct place for them is after the strategic policies and before the development sites. As for the boundaries of the nine distinct areas, we are not convinced by your arguments. Our Society take its name from the Parish of Mortlake with East Sheen which has a boundary much older than the other versions shown on your list and certainly more established than the ward boundaries which are forever changing. As for Richmond Park, when we enter it at Sheen Gate, we feel we are part of East Sheen, not Ham or Petersham! Both Palewell and Sheen Commons back onto the park, as does housing on the peripheral roads. The backdrop of the park is integral to the character of these areas and surely the ecology, as well as providing an amenity. The historic approach to the park at Richmond Gate is also part of Richmond rather than Ham. Given that the park has its own governance it makes sense to recognise its contribution to all areas that abut it.	
72	Peter Willan and Paul Velluet, <b>Old Deer Park Working Group</b>	General comment (in relation to sustainable growth)					[See comment 21] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: 278... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 278 in relation to sustainable growth]	





73	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	General comment (in relation to sustainable growth)					[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 279... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 279 in relation to sustainable growth]	
-	Suzanne Parkes, <b>Elmbridge Borough Council</b>						[See comment 64 in relation to Policy 2]	
-							<b>Places</b>	
74	James Sheppard (CBRE), <b>LGC LTD</b>	Publication Local Plan Site Allocation omission - LGC site	No	No	Positively Prepared; Justified; Effective; Consistent with national policy		<p><b>Consultation on the Draft Local Plan: Publication Version (Regulation 19) – July 2023</b>  <b>Re: LGC Ltd, Queens Road, Teddington, Middlesex, TW11 0LY</b></p> <p>We write on behalf of our client LGC Ltd. (hereafter referred to as 'LGC') in response to consultation on the Local Plan Publication Version (Regulation 19), June 2023, hereafter referred to as the 'Publication Local Plan'.</p> <p>We write to reinforce our previous advocacy, specifically relating to our representations to the Draft Local Plan Pre-Publication Version (Regulation 18) consultation, dated 31 January 2022, and in respect to the Direction of Travel consultation document and Call for Sites, dated 18th March 2020.</p> <p>In addition, this consultation response follows various previous representations submitted to LBRuT on behalf of LGC, in respect of the now adopted Local Plan (July 2018 and March 2020). Previous representations presented to the Council on behalf of LGC were dated 15th February 2017, 18th August 2016 and 28th January 2016. These representations supported and promoted a mixed-use allocation at the site, including for a modern, fit-for-purpose headquarters premises, alongside much needed housing, including affordable housing.</p> <p>We submit that the Publication Local Plan fails to meet the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (NPPF). The plan has not been positively prepared taking into account the Borough's objectively assessed needs, is unjustified as it has failed to take into account reasonable alternatives, is ineffective as it would fail to be deliverable over the plan period and is inconsistent with regional (London Plan 2021) and National Policy.</p> <p>In addition, there are crucial areas where the Publication Local Plan is not in compliance with the London Plan and cannot therefore be considered legally compliant.</p> <p>Our Local Plan representations to date have promoted the redevelopment of the LGC site for a mix of employment and residential uses, through the introduction of a specific mixed-use allocation. A truly comprehensive mixed-use redevelopment of the site would secure a high-quality employment offer, accommodating new businesses and enhancing the investment potential in Teddington, whilst delivering affordable workspace and space for SMEs. This would result in a breadth of employment mix on site, re providing and enhancing the existing net employment space on site.</p> <p>It has been demonstrated through the preparation of an indicative scheme, presented to the Council, that redevelopment of the site can satisfy no-net loss of employment floorspace, provide a meaningful contribution to the Borough's housing land supply, whilst delivering a policy compliant number of affordable homes. It is well documented that the Council is severely lacking in respect to delivery of affordable homes. The indicative scheme also demonstrated how the site could be redeveloped to incorporate a sensitive design in respect to heights and massing, respond positively to its surrounding urban design context, whilst ensuring the inclusion of high-quality green space and landscaping, opening up the site to promote permeability and active travel.</p> <p>In broad terms, an indicative scheme, when compared with net existing employment floorspace of c.10,000sqm, could include:</p> <ul style="list-style-type: none"> <li>• Approximately 11,000sqm of new employment floorspace</li> <li>• Approximately 279 homes, including up to 50 per cent affordable housing</li> <li>• Active, outward facing site boundaries, integrating the site into the surrounding suburban context whilst enhancing site permeability</li> <li>• Publicly accessible green open space.</li> </ul> <p><b>Principle of Mixed-Use redevelopment</b></p> <p>The site is currently under-developed, under-used and underoccupied. The effective use of this sustainable brownfield site would be assured through the development of a significant quantum of new Grade A office/lab employment space. New, much needed employment floorspace would serve to provide accommodation for a range of occupiers including start-ups and expanding/relocating businesses within LBRuT. It would also be proposed for this to include a policy compliant level of affordable workspace.</p>	<p><b>Modifications to ensure the Local Plan is Sound and Legally Compliant:</b></p> <p><b>1. Mixed-use Site Allocation to be included</b> (employment and residential) for LGC Ltd, Queens Road, Teddington, Middlesex, TW11 0LY</p> <p>- For the reasons as set out above</p>

						<p>In addition, new homes would not only serve to subsidise high-quality new commercial development on site, but also provide an appropriate means of delivering much needed affordable homes for the borough.</p> <p>The Publication Local Plan, in para 3.3, sets out a series of strategic objectives. Notably these include the optimisation of land and resources by ensuring new development takes place on previously developed land and in sustainable locations; maximising the delivery of genuinely affordable homes by taking innovative and flexible approaches to deliver more affordable housing to meet the needs of Richmond's residents; reinforcing the role of Teddington where major new development should be focused in this sustainable location; providing a variety of opportunities for affordable and adaptable workspaces encouraging opportunities to work locally, whilst crucially increasing jobs and helping business to grow and bounce back following the pandemic.</p> <p>A mixed-use development would successfully consolidate an inefficient and obsolete series of buildings and make more efficient use of the wider site, thereby increasing the numbers of jobs on site from approximately 250 to approximately 850, provide new high-quality space for incoming or expanding businesses, whilst providing approximately 150 new affordable homes. Crucially, a mixed-use proposal ensures a breadth and depth of planning benefit for the community of Teddington and the wider borough of LBRuT.</p> <p>The supportive context for mixed-use redevelopment is reflected at national policy level. The National Planning Policy Framework (NPPF) actively seeks to promote effective use of land. Paragraph 120 directs that planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed use schemes; give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs; and promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.</p> <p>A mixed-use allocation would truly serve to optimise the use of this highly sustainable brownfield site.</p> <p>In our strong view, the site lends itself well to a mix of employment and residential uses. The site can provide for a comprehensively master planned, sustainable, mixed-use development that provides modern, fit-for-purpose employment spaces for new, expanding and relocating businesses and delivers much needed homes. Importantly, it is clear from the significant under-delivery of affordable housing that the site could serve as a productive and effective contributor to the Council's affordable housing land supply over the forthcoming plan period.</p> <p>[See comment 401 relating to employment, comment 350 in relation to affordable homes, and comment 507 in relation to urban design]</p> <p><b>Summary</b></p> <p>In our strong view, the site lends itself well to a mix of employment and residential uses. The sustainably located, brownfield site can provide for a comprehensively master planned, mixed-use development that provides new employment space for new, expanding and relocating businesses and delivers much need homes. Importantly, it is clear from the continued under-delivery of affordable housing that the site could serve as a productive and effective contributor to the Council's affordable housing land supply over the forthcoming plan period. In addition, redevelopment could successfully activate the street scene, provide new high quality publicly accessible green spaces, enhance permeability and promote active travel, be outward facing and connect with the local urban design vernacular.</p> <p><b>It is for the reasons as set out above that we consider the plan to be currently unsound and not legally compliant.</b></p>	
75	Philip Villars, PMV Planning Limited on behalf of owner of Arlington Works	Site Allocation omission: Arlington Works		No		<p>As such, and in accordance with para 122 of the NPPF, the whole Arlington Works site should be allocated for mixed use development to meet identified needs for employment space and housing. There is an acknowledged shortage of both in this part of London, particularly for affordable housing.</p> <p>[See comments 329 in relation to the waste site designation, 352 on housing, 61 on living locally, 564 on marketing requirements and 185 on the placed-based strategy for Twickenham, Strawberry Hill and St Margarets.]</p>	
76	Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common	Site Allocation omission: Chertsey Court, Lower Richmond Road, Mortlake				<p><b>b. Reasons for the proposed amendments - 2</b></p> <p>The reluctance to consider alternative plan sites is in breach of NPPF policy 32. This site allocation could have helped to achieve other planned strategic objectives in the London and Local plan, including delivering affordable housing, and optimal transport infrastructure changes, and unfortunately these opportunities have now been missed. I would ask if the inspector can consider whether this site should be included.</p> <p>Chertsey Court should be included as a site allocation because the rejection of this site was not justified as required by NPPF policy 35b. Alternate proposals, which could enable the delivery of more sustainable development, were not considered properly.</p> <p>[See c. Relevant Policies and other evidence on housing in comment 288 on Place Based Strategy for Mortlake &amp; East Sheen]</p>	<p><b>a. Local Plan proposed amendments– 2</b></p> <p>I proposed Chertsey Court as a site allocation within the plan. In her e-mail on 18 April, the Spatial Planning and Design Team Manager replied:</p> <p>'Regarding the suggestion that Chertsey Court be included in the existing STAG Brewery Allocation, ... it is worth noting that no representation was made by RHP to include Chertsey Court in [March-April 2020 or] any plan making stages... Given the site is adjacent, rather than complimentary to the STAG Brewery site, and noting the different ownerships as well as the absence of any recent or future development aspirations from RHP, it would not be logical to extend the current Site Allocation to include the adjacent Chertsey Court estate'.</p> <p>I tried on many occasions to meet with the Officer to discuss the e-mail. I was concerned that my proposals had been misunderstood and that the Officer was not aware of previous discussions that had taken place between members, RHP and the developers, about Chertsey Court. Unfortunately, Officers refused to meet during the consultation period.</p>

[Site Allocation 34a: Chertsey Court, Lower Richmond Road, Mortlake Site Proposal](#)





					<ul style="list-style-type: none"> <li>• Waitrose, West Sheen. The supermarket and the adjacent council car park, library and GP practice are all in a space-inefficient layout.</li> </ul>  <ul style="list-style-type: none"> <li>• Tesco, Teddington: The council-owned surface car park at the rear is space inefficient.</li> </ul> 				
-	David Wilson, <b>Thames Water</b>				[See comment 85 in relation to Place-based Strategy for Hampton & Hampton Hill Site Allocations - Omission Site of Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road]				
-	David Wilson, <b>Thames Water</b>				[See comment 86 in relation to Place-based Strategy for Hampton & Hampton Hill Site Allocations - Omission Site of Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road]				
78	Jon Rowles	Places			- The current local plan had 'Village Plans' and 'Village Planning SPD's' for each village using an urban village/neighbourhood planning approach, but the incoming Liberal Democrat administration decided to discontinue the 'village plans' in 2018 and deleted them from the council website so the main overarching strategy in the current local plan stopped functioning. I feel the council at least needs to amend the place strategy and ensure their places/towns are not too big, and they should each have statements prepared to show local priorities. However, I feel the council should encourage each area to have a full neighbourhood plan so that decision-making is brought as close to local communities as possible.				
79	Richard Carr, <b>Transport for London (TfL)</b>	All Site Allocations			<table border="1"> <tr> <td>Section</td> <td>Track change/comment – Reg. 18</td> <td>Updated track/change comment – Reg. 19</td> </tr> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	
Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19							

						All Site Allocations	Not applicable	We note that you have added in some useful context on transport/highways for all sites which we welcome. However, we recommend that you state the PTAL as a numeric score and remove any subjective grading such as 'poor, average or good'. The London Plan no longer uses subjective grading. How a PTAL is valued depends on the context – in a suburban area a site with a PTAL of 3 may be regarded differently to the same score for a site in Richmond or Twickenham town centres. It may also depend on the proposed uses.		
80	Tim Brennan, Historic England	Site Allocations						<p>Site allocations</p> <p>We welcome the greater level of detail in relation to the existing context of each of the site allocations, including the identification of relevant heritage assets, as well as references to other evidence and guidance such as the Urban Design Study and SPDs. On the whole, we consider these set an appropriate framework to guide development proposals for the majority of the allocations.</p> <p>However, for a limited number of the draft allocations in the most sensitive locations we consider there remains some further work to be done to ensure that heritage significance is properly reflected in the allocation policies and therefore conserved and where possible enhanced. As set out in Historic England's advice note on this subject (see <a href="#">here</a>), understanding what contribution the wider site in its current form makes to heritage significance and then assessing what the allocation would have on that significance is an important starting point. This can then be used to inform development parameters and site capacities that avoid harm and identify opportunities for enhancement. This approach also aligns with London Plan policy D3 Optimising Site Capacity and its associated <a href="#">guidance</a>.</p> <p>We note the assessments, analysis and guidance that has been undertaken and/or produced and that underpins much of the draft Plan, including the Urban Design Study and the Village Design (and other) SPDs. Where identified in the site allocation policies, we agree that it is relevant and helpful. However, with regard to the following site allocations, given their sensitivity and potential for impacts on the historic environment, we consider that further amendments are necessary to ensure the allocation policies are clear on how development should manage these impacts. These could draw on assessments already undertaken, or may require further Heritage Impact Assessments. Where taller or larger buildings are envisaged, 3D modelling will enable clarity as to impacts and help shape design parameters (including capacities) to avoid adverse impacts on heritage assets. Such an approach will also help strengthen the link between the evidence base and the resultant policies, ensure that site capacities are optimised and design-led as well as contribute to a positive strategy for the historic environment.</p> <p>Comments are set out below on three site allocations where we consider the above considerations apply given heritage sensitivities. We would also recommend the inclusion of further text to ensure that GLAAS is consulted at an early stage of proposals with regard to place making and public benefit opportunities. Please also note that they are in Archaeological Priority Areas, rather than Zones.</p>		
81	Anna Stott (WSP), Sainsburys Supermarkets Ltd	Site Allocations (Sainsbury's sites)		No	Justified; Consistent with national policy			<p><b>REPRESENTATIONS TO THE RICHMOND LOCAL PLAN 'THE BEST OF OUR BOROUGH' (REG. 19) DRAFT FOR CONSULTATION</b></p> <p>On behalf of Sainsbury's Supermarkets Limited (SSL), we write in response to the consultation of the new Local Plan prepared by the London Borough of Richmond Upon Thames under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>We have reviewed the Regulation 19 draft version of the new Richmond Local Plan. We are pleased to see that part of our previous representations to the Regulation 18 consultation in respect of emerging site allocations at the St Clares Superstore (Site Allocation 5) and the Richmond Superstore (Site Allocation 29), dated 21 January 2022, have been addressed.</p> <p>However, there are still outstanding matters that have not been addressed that need to be reconciled in future versions of the emerging Local Plan.</p> <p><b>Summary</b></p> <p>In summary, the proposed allocations of the two Sainsbury's sites (Draft allocations 4 and 30) are still unacceptable as drafted. The current wording makes the Plan unsound.</p> <p>We trust that these proposed amendments will be incorporated in the next iteration of the Local Plan. Sainsbury's are a major investor and employer in the Borough, and we hope that the council will take this opportunity to engage constructively with them.</p> <p>[See details in comments 129, 266 and 487]</p>		
82	Duncan McKane, London Borough of Hounslow	Site Allocations						<p><b>Site Allocations</b></p> <p>LBH note that there are a number of large site allocations located close to the shared boundary which are proposed for residential, amongst other uses</p> <ul style="list-style-type: none"> <li>• Site Allocation 4: Carpark for Sainsburys, Uxbridge Road, Hampton</li> <li>• Site Allocation 18: Homebase, Twickenham Road, Hanworth (<i>new site allocation</i>)</li> </ul>		

						<ul style="list-style-type: none"> <li>• Site Allocation 21: Kneller Hall, Whitton</li> <li>• Site Allocation 31 Kew Retail Park, Bessant Drive, Kew</li> <li>• Site Allocation 35: Stag Brewery, Lower Richmond Road, Mortlake (LBH also note the currently in progress outline scheme on this site for up to 1,085 homes for which LBH have submitted comments – your reference 22/0900/OUT).</li> </ul> <p>As discussed at a duty to cooperate meeting between officers from both boroughs on 19<sup>th</sup> July 2023, LBH note that the emerging allocations have been reformatted to include more information relating to existing context and constraints, and that 3 new allocations have been added whilst some have dropped away.</p> <p>LBH also note that no minimum development quanta for either residential units or non-residential floorspace have been provided within site allocations, and no set maximum height parameters. LBH request that should development come forward on these sites, LBRuT engage with our development management officers at the earliest possible opportunity in order to ensure that any cross-boundary impacts can be adequately assessed and addressed.</p>	
83	David Wilson, Thames Water	Site Allocations		No	Consistent with national policy	<p>As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the Borough and are hence a “specific consultation body” in accordance with the Town &amp; Country Planning (Local Planning) Regulations 2012. These representations are also prepared on behalf of Thames Water as a landowner within the Borough. We are submitting response forms relating to the following policies:</p> <ol style="list-style-type: none"> <li>1. Policy 6 - Water Efficiency/Climate Change Comments [See comment 325]</li> <li>2. Policy 8 - Flood Risk &amp; Sustainable Drainage Comments [See comment 333]</li> <li>3. Policy 9 - Water Resources and Infrastructure [See comment 343]</li> <li>4. Policy 35 - Green Belt - Hampton Water Treatment Works (WTW) – Proposed Green Belt deletion [See comment 462]</li> <li>5. Policy 39 - Biodiversity - M085 Hampton Water Treatment Works and Reservoirs Nature Conservation Designation [See comment 492]</li> <li>6. Policy 53 - Local Environmental Impacts - Development within the vicinity of Sewage Pumping Stations (and Sewage Works) Works [See comment 552]</li> <li>7. 6 - Place-based Strategy for Hampton &amp; Hampton Hill Site Allocations - Omission Site - Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road [See comment 85]</li> <li>8. 6 - Place-based Strategy for Hampton &amp; Hampton Hill Site Allocations – Omission Site - Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road [See comment 86]</li> <li>9. Draft Allocations - comments in relation to water/wastewater infrastructure.</li> </ol> <p><b>Site Allocations</b></p> <p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.</p> <p>The attached table provides Thames Water’s site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements. [See comments 121, 123, 126, 127, 131, 178, 179, 180, 182, 190, 194, 198, 202, 205, 207, 210, 211, 214, 217, 223, 224, 228, 236, 237, 249, 253, 255, 257, 261, 268, 278, 281, 283, 285, 295, 300, 301, and 302 which contains all the details from the attached table]</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> <li>• What drainage requirements are required on and off site</li> <li>• Clarity on what loading/flow from the development is anticipated</li> <li>• Water supply requirements on and off site</li> </ul> <p>The time to deliver upgrades shouldn’t be underestimated it can take 18months – 3 years from the time of certainty and in some cases it may be appropriate for a suitably worded planning condition to be attached to ensure development doesn’t outpace the upgrades. Developers are encouraged to engage at the earliest opportunity to discuss their development needs via Thames waters pre planning service <a href="https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity">https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</a></p> <p>We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section.</p> <p>Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.</p>	Include reference to any identified water/wastewater infrastructure issues, as identified in attached table, in relevant site Policy. [See comments 121, 123, 126, 127, 131, 178, 179, 180, 182, 190, 194, 198, 202, 205, 207, 210, 211, 214, 217, 223, 224, 228, 236, 237, 249, 253, 255, 257, 261, 268, 278, 281, 283, 285, 295, 300, 301, and 302 which contains all the details from the attached table]
-						<b>Place-based Strategy for Hampton &amp; Hampton Hill</b>	
84	Katherine Drew, The Royal Parks	Place-based Strategy for Hampton & Hampton Hill Policy - specific to biodiversity and the Royal Parks’				<p>In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again. [See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 285 in relation to protection of open space and risks]</p>	

		Environmental Designations						
85	David Wilson, Thames Water	Place-based Strategy for Hampton & Hampton Hill Site Allocations - Omission Sites	No	No	No	Consistent with national policy	<p><b>1. Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road:</b>  Site area: approximately 3.58 hectares (refer to enclosed location plan). [See Appendix 2]  Current use: vacant land/retained operational land.  Proposed use: residential or mixed use development.  Likely availability: 1-5 years. The site is currently within the Green Belt, but is very well contained and sandwiched between the Stain Hill West Reservoir to the east and residential development along Kenton Avenue with Upper Sunbury Road forming the northern boundary and Lower Hampton Road forming the southern boundary.  The Arup Open Land Review assessed the site as part of GA5. We disagree with the review and consider the site does not perform strongly in Green Belt terms. The Green Belt review is unclear as to which settlement sprawl is being referred to as the River Thames separates Molesey and Hampton and this part of Green Belt is not strategic in the whole parcel (i.e. the assessment of the parcel in its entirety leads to a flawed judgement and assessment of the Green Belt). There is a broken Green Belt connection around the land to west of Stain Hill West Reservoir.  The site is currently retained operational land but included in a review that Thames Water is carrying out of its landholdings to establish both strategic needs for future infrastructure (Hydes Field), and also whether a site can be released for redevelopment (land to West of Stain Hill West Reservoir).</p>	The site should be removed from the Green Belt and allocated for residential development.
86	David Wilson, Thames Water	Place-based Strategy for Hampton & Hampton Hill Site Allocations - Omission Sites	No	No	No	Consistent with national policy	<p><b>2. Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road:</b> (refer to enclosed location plan). [See Appendix 2]  Current use: retained operational land and 3rd party leases  Proposed use: the site was previously put forward for water infrastructure and mixed use development. The site is currently being assessed for new Water Supply development as part of Thames Water's new Water Resource Management Plan. The site is being proposed as a new effluent treatment plant for water supply.  This site is currently within the Green Belt, but is also well contained and sandwiched between development along Oldfield Road and Portlane Brook (with Kempton Racecourse beyond) with Upper Sunbury Road forming the southern boundary and the railway line to the north. We disagree with the Green Belt review and consider the site does not perform strongly in Green Belt terms. The Green Belt review is unclear as to which settlement sprawl is being referred to as the River Thames separates Molesey and Hampton and this part of Green Belt is not strategic in the whole parcel. It is therefore considered that the site should be removed from the Green Belt.  London's water needs are the key driver for the strategic resource options programme which supports the development and delivery of strategic schemes that will provide long term resilience to clean water provision for the region. This site represents a large landholding strategically located near key existing sewage treatment sites (Mogden STW in LB Hounslow and Hogsmill STW in RB Kingston upon Thames), water treatment sites (Hampton WTW; Kempton WTW; Walton WTW) and a number of reservoirs in south west London and therefore is critical to supporting this strategic development. As such, it is considered that exceptional circumstances exist to release this site from the Green Belt in order to ensure the delivery of critical infrastructure is made more straightforward within the planning system. The site is currently retained operational land but are included in a review that Thames Water is carrying out of its landholdings to establish strategic needs for future infrastructure. Consistent with that review process and to ensure appropriate development plan support is available for these potential essential infrastructure developments, it is also considered that the Hydes Field site should be allocated in the new Local Plan as a future infrastructure development site, with its use defined as for water and / or wastewater infrastructure provisions.  There is also an opportunity for the site to contribute towards landscape and biodiversity enhancement, which would be supported by allowing some essential infrastructure development. Any future use of these sites would be expected to integrate the provisions of emerging policy in respect of biodiversity net gain, and local requirements relating biodiversity and landscaping, to ensure their strategic future development is appropriately integrated within their receiving environments.</p>	Allocate the site as a future infrastructure development site, with its use defined as for water and / or wastewater infrastructure provisions.
87	Gary Hagreen	St Clare mid-rise zone [this point made on response form against Appendix 3]	No	No	No	Positively Prepared; Justified	<p>Appendix 3 Tall and Mid-Rise Building Zones  St Clare (Hampton Hill): Mid-Rise Building Zone  St Clare is definitely not appropriate for 5 storey developments - this site is a backland development which means it should be no higher than the surrounding 2 - 3 storey Victorian residential dwellings. The proposal for this development has already been rejected at planning committee for being too high and overbearing but the planning officer told the committee they could not reject it on reasons of height??? How can this be possible??  They is very large local oposition to this development at 5 storeys - the current proposal has over 360 local objections registered on the Richmond Planning portal.  Richmond planning strategy for Hampton Hill states:  "Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and  'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings"  How can you make this statement then say that it is appropriate for 5 storeys?  I very strongly disagree with the St Clare site being included in the mid rise building zones.</p>	remove the St Clare site from the mid rise building zones

88	Alison Barker	St Clare mid-rise zone [this point made on response form against Appendix 3]		N o	N o	Positively Prepared; Justified	Page no.s 29 - 31 and 413 - 416 - 28.14 - Policy no. Appendix 3 - Tall and mid-rise building zones - place based strategy, for Hampton and Hampton Hill page 29 - map / plan for St. Clare's, Hampton Hill - reference mid-rise building zone to 5 storeys (15m) i height being considered appropriate for the development. In your overall strategy for Hampton Hill you note that Hampton Hill Residential is sensitive to change which is out of keeping with the current landscape and that, 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings.' However, Appendix 3 for St Clare's specifies that building a 5 storey building would be acceptable. This goes against the wishes of the vast majority of the residents and it out of keeping with the height of other buildings in the area.	Please remove the notion that 5 storey buildings, as stated in Appendix 3, are appropriate for construction in Hampton Hill / in the St Clare's development. It would blight the skyline and dwarf the surrounding area. Thank you
89	Heather Ayres	St Clare mid-rise zone		N o	N o	Positively Prepared; Justified	Page numbers Pages 29 - 31 and 413 - 416 Policy no/name Appendix 3 Tall and mid-rise building zones Place -based strategy Page 29 and following....Place Based strategy for Hampton and Hampton Hill Maps St Clare (Hampton Hill): Mid-Rise Building Zone Appropriate Height: 5 storeys (15m) In your Overall Strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 & 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.	The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval.
90	Katie Sullivan	St Clare mid-rise zone [this point made on response form against Appendix 3]		N o	N o	Positively Prepared; Justified	Page numbers 29-31 and 413-416. Policy number/name Appendix 3 tall and mid rise building zones Page 29 relating to the Place Based strategy for Hampton and Hampton Hill Map of St Clare's - mid rise building zone appropriate height - 5 storeys (15m) In your strategy for Hampton Hill you make clear that it has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance. You proceed to say "there is an opportunity to establish distinctive landmarks without recourse to tall buildings. Why then at Appendix 3 do you circumvent this by saying that the St Clare's development is an appropriate height at 5 metres. You have previously rejected a planning application at this height for very justified reasons and so why are you trying to circumvent the planning process by permitting it via the back door in a way local residents will not notice - that is seriously misleading and underhand. Indeed we didn't object to the most recent St Clare's application because they have finally agreed to reduce the height, but now we have grave concerns this Local Plan effectively opens the door for the developer to submit a variation to planning once the Local Plan is in place to increase the height, when residents will have less power. Accordingly, it is wrong and unjust to include this Appendix because it is contrary to the views of local residents and does not conserve and enhance the area or protect it in the way you describe earlier on in this Local Plan.	As per the above, please remove Appendix 3 and the reference to 5 storeys being appropriate for the St Clare's development.
91	Jane Marwood	St Clare mid-rise zone		N o	N o	Positively Prepared; Justified	Page numbers Pages 29 - 31 and 413 - 416 Policy no/name Appendix 3 Tall and mid-rise building zones Place -based strategy Page 29 and following....Place Based strategy for Hampton and Hampton Hill Maps St Clare (Hampton Hill): Mid-Rise Building Zone Appropriate Height: 5 storeys (15m) In your Overall Strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 & 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.	The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix ,which goes against the views of a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill, before it has gone through the proper process of approval.
92	Greg Palmer	St Clare mid-rise zone		N o	N o	Positively Prepared; Justified	Page numbers Pages 29 - 31 and 413 - 416 Appendix 3 Tall and mid-rise building zones Place -based strategy Page 29 and following....Place Based strategy for Hampton and Hampton Hill Maps St Clare (Hampton Hill): Mid-Rise Building Zone Appropriate Height: 5 storeys (15m) In section 6 Place based strategy for Hampton & Hampton hill the document says "Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance." and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 & 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.	modification(s) The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval. So if consistent building heights are an important feature to conserv,e why do we see in Appendix 3 that St Clare business park has been accorded a 5 storey (mid rise) status. What are our elected representatives and council planners up to ? It would appear they are paving a way for st clares 5 storeyes to be approved. They should not they are still too many, too high and still too ugly



93	Christine Palmer	St Clare mid-rise zone		N o	N o	Positively Prepared; Justified	<p>Place based strategy for Hampton &amp; Hampton Hill Policy no/name Appendix 3 Tall and mid-rise building zones Page numbers Pages 29 - 31 and 413 - 416 Maps St Clare (Hampton Hill): Mid-Rise Building Zone Appropriate Height: 5 storeys (15m) In your Overall Strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 &amp; 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill. In addition the process required to respond to the Local Plan suggestions is restricted to those who take an active interest in these issues .If the Council Planning department really wanted to involve the electorate in the Planning Process they really should be reaching out to the public in more obvious and public methods.</p> <p>[comments made on response form against reason for participation at EIP] New buildings account for 40% of greenhouse emissions. Nowhere in the plan am I able to identify an explicit green policy of repurposing older buildings. Nor are there any hints of attempting to restrict the impact new building have on existing poorly funded and maintained infrastructures; namely Schools, GP surgeries, and especially sewage disposal and treatment By Thames Water. App3 also could be read as paving the way for speculative building developers who want as much profit as possible regardless of the impact their proposals have on the built environment and quality of life for residents</p>	<p>The St Clare site development (amongst other contentious proposals Stags brewert Mortlake, Greggs Bakers Twickenham etc) has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix 3 which not only goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval. It also goes against and contradicts the Planning Departments own description of Hampton Hill: "Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance.</p>
94	Roger Hitchman	St Clare mid-rise zone		N o	N o	Positively Prepared; Justified	<p>Place based strategy for Hampton &amp; Hampton Hill Policy no/name Appendix 3 Tall and mid-rise building zones Page numbers Pages 29 - 31 and 413 - 416 Maps St Clare (Hampton Hill): Mid-Rise Building Zone Appropriate Height: 5 storeys (15m) Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green and the strategy is to conserve and enhance. and there is an opportunity to establish distinctive landmarks without recourse to tall buildings. However appendix 3 states 'St Clare (Hampton Hill) appropriate height 5 storeys.' The area around St Clare is a 2 &amp; 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.</p>	<p>The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval.</p>
95	Martha Robinson	St Clare mid-rise zone		N o	N o	Positively Prepared; Justified	<p>Place based strategy for Hampton &amp; Hampton Hill Policy no/name Appendix 3 Tall and mid-rise building zones Page numbers Pages 29 - 31 and 413 - 416 Maps St Clare (Hampton Hill): Mid-Rise Building Zone Appropriate Height: 5 storeys (15m) In your Overall Strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the are, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance,' You also reference: 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' Appendix 3 contradicts this, stating that 'St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clares is predominantly 2 and 3 storey Victorian terraces, so the appropriate height for St Clare's is not 5 storeys and is inconsistent with your strategy for allowing tall or mid rise buildings in Hampton Hill.</p>	<p>The development on St Clare's has not yet been passed by the Planning Committee and so the the reference to 5 storeys for this site should be removed from Appendix 3. The inclusion of 5 storeys buildings in this development is vehemently opposed by many local residents.</p>
96	Ian Donald	St Clare mid-rise zone		N o	N o	Positively Prepared; Justified	<p>Page numbers 29-31 and 413-416. Policy no/name: Appendix 3 Tall and mid rise building zones. Place based strategy page 29 and following...Site Allocation: Hampton and Hampton Hill. Maps: St Clare (Hampton Hill) Mid-Rise Building Zone appropriate Height: 5 storeys (15m). In your Overall Strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 &amp; 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.</p>	<p>The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval. At the very least, adding this to the local plan, when this has already been objected at the original planning application meeting, (please refer to recording of meeting), feels at best suspicious!</p>

97	Janet Williams	St Clare mid-rise zone		No	No	Positively Prepared; Justified	<p>Page numbers 29-31 and 413-416. Policy no/name: Appendix 3 Tall and mid rise building zones. Place based strategy: page 29 for Hampton and Hampton Hill. Maps, St Clare, Hampton Hill - Mid-Rise Building Zone Appropriate Height: 5 storeys.</p> <p>In your overall strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green and the strategy is to conserve and enhance'. and 'There is an opportunity to establish distinctive land marks without recourse to tall buildings'. However Appendix 3 states St Clare (Hampton Hill) appropriate for a Height 5 Storeys. The area around St Clare is 2&amp;3 Storey Victorian Terrace Streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.</p>	The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not conserve or enhance the area of Hampton Hill before it has gone through the proper process of appeal
98	Robert Harvey	St Clare mid-rise zone		No	No		<p>Page numbers 29-31 and 413-416; Policy no/name: Appendix 3 Tall and mid rise building zones. Place based strategy page 29 and following... place based strategy for Hampton and Hampton Hill. Maps, St Clare (Hampton Hill): Mid-Rise Building Zone appropriate Height: 5 storeys (15m).</p> <p>In your Overall Strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 &amp; 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.</p>	The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval.
99	Ben Moxon	St Clare mid-rise zone		No	No	Positively Prepared; Justified	<p>Page numbers 29-31 and 413-416; Policy no/name: Appendix 3 Tall and mid rise building zones. Place based strategy page 29 and following... place based strategy for Hampton and Hampton Hill. Maps, St Clare (Hampton Hill): Mid-Rise Building Zone appropriate Height: 5 storeys (15m).</p> <p>In your Overall Strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 &amp; 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.</p>	The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval.
100	Audrey Donald	St Clare mid-rise zone		No	No	Positively Prepared; Justified	<p>Page numbers 29-31 and 413-416; Policy no/name: Appendix 3 Tall and mid rise building zones. Place based strategy page 29 and following Hampton and Hampton Hill. Maps, St Clare (Hampton Hill): Mid-Rise Building Zone appropriate Height: 5 storeys (15m).</p> <p>In your Overall Strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 &amp; 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.</p>	The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval.
101	Anne Chatterton	St Clare mid-rise zone		No	No	Positively Prepared; Justified	<p>Page numbers 29-31 and 413-416; Policy no/name: Appendix 3 Tall and mid rise building zones. Place based strategy page 29 and following .... place based strategy for Hampton and Hampton Hill. Maps, St Clare (Hampton Hill): Mid-Rise Building Zone appropriate Height: 5 storeys (15m).</p> <p>In your Overall Strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 &amp; 3 storey Victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.</p>	The St Clare site development has NOT yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix whilst the development has not been passed and which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval.
102	Anthony Reed	St Clare mid-rise zone	Yes	No	No	Positively Prepared; Justified	<p>Pages: 29-31; 413 Place-based strategy: Hampton &amp; Hampton Hill Maps: St Clare (Hampton Hill) Mid-Rise Building Zone The "Place-based Strategy for Hampton &amp; Hampton Hill" contains the following statements:- "The busy local centre of Hampton Hill maintains its village character ....."</p>	Delete the map and statement in Appendix 3 entitled "St Clare (Hampton Hill): Mid-Rise Building Zone Appropriate Height: 5 storeys (15m) ".

							"Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance. " "There is an opportunity to establish distinctive landmarks, without recourse to tall buildings, ....." However, the map of St Clare (Hampton Hill) in Appendix 3 – "Tall and Mid-Rise Building Zones" contains the statement "Appropriate Height: 5 storeys (15m)". This statement blatantly contradicts all those noted above that are contained in the strategy of Hampton Hill and should be removed.	
103	Linda Brignall, <b>Hampton Hill Association</b>	St Clare mid-rise zone	No	N o	N o	Positively Prepared; Justified	Page numbers 29-31 and 413-416. Policy no/name: App3, Tall and Mid Rise Building Zones. Place based strategy: Hampton and Hampton Hill. Site Allocation: St Clare Business Park. Maps: St Clare Hampton Hill - Building Zone Appropriate Height 5 storeys (15m). The "Overall Strategy for Hampton Hill" states:- "Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sence of green, and the strategy is to conserve and enhance." and "There is an opportunity to establish distnctive landmarks, without recourse to tall buildings, to improve legibility, focused along main roads and at key junctions." However, Appendix 3 states "St Clare (Hampton Hill): Mid-Rise Building Zone. Appropriate Height 5 storeys (15m)." The area around St Clare is 2 & 3 storey Victorian terraced streets. It is inconsistent with the strategy for Hampton Hill to allow tall or Mid-rise buildings in Hampton Hill.	The St Clare site development has not yet been passed by the planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not "conserve or enhance" the area of Hampton Hill.
104	Amanda <b>Ribbans</b>	St Clare mid-rise zone		N o	N o	Positively Prepared; Justified	Page numbers 29-31 and 413-416; Policy no/name: Appendix 3 Tall and mid rise building zones. Place based strategy: Hampton and Hampton Hill. Maps, St Clare (Hampton Hill): Mid-Rise Building Zone appropriate Height: 5 storeys. In your Overall Strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 & 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.	The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval.
105	Denise <b>Donald</b>	St Clare mid-rise zone Appendix 3 Tall and mid-rise building zones		N o	N o	Positively Prepared; Justified	Page numbers 29-31 and 413-416; Policy no/name: Appendix 3 Tall and mid rise building zones. Place based strategy page 29 and following Hampton and Hampton Hill. Maps, St Clare (Hampton Hill): Mid-Rise Building Zone appropriate Height: 5 storeys (15m). In your Overall Strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 & 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.	The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval.
106	Georgia Ballantine, <b>Hampton Hill Business Association</b>	St Clare mid-rise zone		N o	N o	Positively Prepared; Justified	Place based strategy for Hampton & Hampton Hill Policy no/name Appendix 3 Tall and mid-rise building zones Page numbers Pages 29 - 31 and 413 - 416 Maps St Clare (Hampton Hill): Mid-Rise Building Zone Appropriate Height: 5 storeys (15m) Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, surburban character and sense of green and the strategy is to conserve and enhance. and there is an opportunity to establish distinctive landmarks without recourse to tall buildings. However apendix 3 states 'St Clare (Hampton Hill) appropriate height 5 storeys.' The area around St Clare is a 2 & 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.	The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval. St Clares is also currently a commercial site which at no point as commercial property would need to be at the excess of 5 storeys. Again without it going through the proper process of approval Appendix 3 is allowing it also to be classed as residential site prior to passing Planning Committee.
107	John <b>Webb</b>	Place Based strategy for Hampton and Hampton Hill (p. 29-31) Appendix 3 Tall and Mid-Rise Building Zones (p. 413-416) St Clare		N o	N o	Positively Prepared; Justified; Consistent with national policy	On page 29 <b>6 Place-based Strategy for Hampton &amp; Hampton Hill states:</b> <b>Overall strategy p30 :</b> Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance. <b>Vision p30:</b> The characteristic local urban scale and rural feel with its parks, green spaces and riverside, will be retained. The 'local urban scale' surrounding the St Clare buisness Park site is predominatly 2 storeys with one exception 3. <b>P31</b>	2) To make The Plan consistent with other policies remove St Clare (Hampton Hill): Mid-Rise Building Zone Appropriate Height: 5 storeys (15m) from Appendix 3 Tall and Mid-Rise Building Zones



		(Hampton Hill) Mid-Rise Building Zone				Future development in this place is expected, where relevant, to: .....There is an opportunity to establish distinctive landmarks, without recourse to tall buildings, to improve legibility, focused along main roads and at key junctions. St Clare Buisness Park is neither on a main road nor at a key jubction. [See also comment 34 in relation to the Introduction and predetermination]	
108	Tina Moxon	St Clare mid-rise zone		N o	N o	Positively Prepared; Justified Page numbers 29-31 and 413-416; Policy no/name: Appendix 3 Tall and mid rise building zones. Place based strategy page 29 and following... place based strategy for Hampton and Hampton Hill. Maps, St Clare (Hampton Hill): Mid-Rise Building Zone appropriate Height: 5 storeys (15m). In your Overall Strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 & 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.	The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval.
109	Jim Simler	Placed-based strategy for Hampton and Hampton Hill, St Clare mid-rise zone		N o	N o	Positively Prepared; Justified Page numbers 29-31 and 413-416; Policy no/name: Appendix 3 Tall and mid rise building zones. Place based strategy page 29 and following .... place based strategy for Hampton and Hampton Hill. Maps, St Clare (Hampton Hill): Mid-Rise Building Zone appropriate Height: 5 storeys (15m). The London Borough of Richmond is blessed with probably the most green space of any of the London Boroughs. It is also rare for a London Borough to boast five villages, designated as such by it's own council. And yet, this same borough that designated the five villages, seems intent on destroying that village atmosphere and allowing developments up to five storeys. This is happening despite the substantial number of residents who have expressed their desire to limit developments to the council's current LPA of three storeys and retain the village atmosphere of Hampton Hill. This is even more surprising that the council in their Overall Strategy for Hampton Hill state the following: "Hampton Hill Residential (A4) has a high sensitivity to change, owing to high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance" It also states: "There is an opportunity to establish distinctive landmarks, without recourse to tall buildings" However, Appendix 3 states "St Clare (Hampton Hill) Appropriate Height 5 storeys" and yet the area around St Clare is 2 and 3 storey Victorian terraced streets. It is totally inconsistent with your strategy to allow more than a 3 storey new building development in Hampton Hill.	The current proposed development of mainly 5 storeys at St Clare has not yet been passed by the Planning Committee. Therefore, to state in your strategy that 5 storeys will be appropriate is particularly at this stage wrong, unjustified and unethical. Furthermore, it completely goes against the express wishes of a substantial number of local residents who have clearly stated that a development of 5 storeys will neither "conserve or enhance" the area of Hampton Hill.
o	Richard Moody	St Clare mid-rise zone		N o	N o	Positively Prepared; Justified Page numbers 29-31 and 413-416; Policy no/name: Appendix 3 Tall and mid rise building zones. Place based strategy page 29 and following .... place based strategy for Hampton and Hampton Hill. Maps, St Clare (Hampton Hill): Mid-Rise Building Zone appropriate Height: 5 storeys (15m). In your Overall Strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 & 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill. This plan and the subject of this development has had consistent local opposition for a number of key reasons - not least of which is the height and the overall impact on the local area. It seems unreasonable to attempt to now change the strategy which could potentially then allow such a development despite continued local opposition. This seems to be a somewhat underhanded approach. I have consistently submitted my objections via the appropriate planning channels on multiple grounds to the development at St Clare as have many other residents. There seems to be a determination to push through this development which could then also affect future plans and further impact the local area in terms of infrastructure, parking and safety. I remain firmly opposed to this type of development and I am dismayed by the fact that local voices with clearly legitimate reasons appear to be ignored. This seems both unreasonable and an unsound and unfair approach. Certainly not positive given the nature and volume of objections that have been lodged.	The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval. 5 Storeys will also overlook a considerable number of residential properties and intrude into privacy of those properties.
111	Paul Stancer	St Clare mid-rise zone				I have been a resident in <b>[Hampton road name removed for data protection]</b> for the last 35 years and have seen a fair amount of change in the village over those years. But recently there has been huge concern among my neighbours and myself over the proposed development at the St Clare's industrial site. This construction of "dwellings" in St Clare's goes wholly against everything that Hampton Hill stands for. We are quite a peaceful bunch here in <b>[Hampton road name removed for data protection]</b> and have worked too hard and long to let something not befitting the character and style of the village take over the industrial site that is St Clare's. This would be a complete travesty to allow a complex of this nature and proportions to dominate the landscape, overlooking all from Holly rd right across to Windmill road and beyond; and I may add, the very idea that traffic would be re-directed	

						<p>more toward the Windmill rd entrance and away from Holly rd would have us all bowing at your feet for being so thoughtful and generous towards us.</p> <p>Yes there is a parking problem with Holly rd as most of the residents do have a car and would expect to be able to park in the street <b>[removed for data protection]</b>, traffic in and out of the road is a bit tight at times but with a little patience from drivers this seems to work itself out. Heavy goods Lorries and Tankers are in and out of St Clare's some of the time and I admit, we all would prefer them not to be there at all but at what cost?</p> <p>I can only cringe at the thought of yet more cars going in and out of what is going to be a very busy place with Care Staff driving in (I have yet to see a carer on a push bike) and visitors who have nowhere else to park overflowing onto Holly rd and its surrounding smaller access roads as well as Windmill rd and its surrounding, already congested access and parking availability. As for the smaller development at the end of Holly rd this has to be the most unlikely place to put any living accommodation due to the downright dangerous access to even get in or out of with a very limited width available and no access at all for the likes of ambulances heaven forbid the need for fire tenders. Maybe these points were overlooked (nay) brushed aside to encompass the "bigger picture".</p> <p>'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 &amp; 3 storey Victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.7. please set out the modification(s)The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval.</p> <p>Lastly I would like to add the disruption on a huge scale at the beginning of the proposed development as hordes of HGV's and the like, move onto St Clare's to clear the site and the subsequent building materials and machinery is delivered .</p>		
112	Robert Kemp	St Clare mid-rise zone		No	No	Positively Prepared; Justified	<p>Page numbers 29-31 and 413-416; Policy no/name: Appendix 3 Tall and mid rise building zones. Place based strategy page 29 and following .... place based strategy for Hampton and Hampton Hill. Maps, St Clare (Hampton Hill): Mid-Rise Building Zone appropriate Height: 5 storeys (15m).</p> <p>In your overall strategy for Hampton Hill you state:</p> <p>"Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance" and "There is an opportunity to establish distinctive landmarks, without recourse to tall buildings"</p> <p>However Appendix 3 states "St Clare (Hampton Hill) appropriate height 5 storeys". The area around St Clare is 2 and 3 storey Victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid rise buildings in Hampton Hill.</p>	The St Clare site development has not yet been passed by the Planning Committee. It is both wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not "conserve or enhance" the area of Hampton Hill before it has gone thru the proper process of approval.
113	Trevor Staplehurst	St Clare mid-rise zone		No	No	Positively Prepared; Justified	<p>Page numbers 29-31 and 413-416; Policy no/name: Tall and mid rise building zones. Place based strategy: Hampton Hill</p> <p>The plan suggests that 5 storey buildings are appropriate for St Clare's site in Hampton Hill.</p> <p>Appendix 3 talks of Hampton Hill sensitivity to change and the predominance 2 and 3 storey buildings in the area. These 2 findings are incompatible and the St Clare's suggestion needs to be revised to 2 to 3 storeys in line with the rest of the Local Plan.</p>	
114	Douglas Urquhart	St Clare mid-rise zone		No	No	Positively Prepared; Justified	<p>Page numbers 29-31 and 413-416; Policy no/name: Appendix 3 Tall and mid rise building zones. Place based strategy page 29 and following Place based strategy for Hampton and Hampton Hill. Maps, St Clares(Hampton Hill)Mid-Rise Building Zone appropriate height: 5 storeys (15m).</p> <p>In your Overall Strategy for Hampton Hill, it is stated that</p> <p>'Hampton Hill residential (A4) has a high sesnsitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance'.</p> <p>and</p> <p>'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings'. Appendix 3 also states that 'St Clares, (Hampton Hill), approximate height 5 storeys'. The current height of all buildings around Hampton Hill is 2-3 storeys, of mainly Victorian terraced houses. This contras the strategy for Hampton Hill, if tall and mid rise buildings are allowed for construction and is inconsistent.</p>	St Clares developepment application has not yet been approved by the Planning Committee. This Appendix should not be included in the Local Plan and should be considered wrong and unjustified. A very large number of local residents believe that 5 storeys doesn't 'conserve or enhance' the area of Hampton Hill, certainly not before the correct process of approval has been considered.
115	Catherine James	Place-based Strategy for Hampton & Hampton Hill St Clare (Hampton Hill): Mid-Rise Building Zone Appendix 3 Tall and Mid-	Yes	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<p>[comments made by email and online included in this schedule as one comment]</p> <p>On Page 5.</p> <p>2 Introduction</p> <p>Setting the Scene</p> <p>Reference should also be made to the Localism Act 2011 which requires in Part 6 Chapter 4 Consultation that there is a 'Duty to take account of responses to consultation' [61X]</p> <p>(2) The person must, when deciding whether the application that the person is actually to make should be in the same terms as the proposed application, have regard to any responses to the consultation that the person has received.</p> <p>Also Part 1 Chapter 6 Predetermination</p> <p>Prior indications of view of a matter not to amount to predetermination etc</p>	To make The Plan compliant with the Localism Act 2011 add Reference to the Localism Act 2011 which requires in Part 6 Chapter 4 Consultation that there is a 'Duty to take account of responses to consultation' [61X] that consultation between decision makers and their electorate in the planning process is encouraged by the LPA and that a decision-maker is not to be taken to have had, or to have appeared to have had, a closed mind when making the decision just because the decision-maker had previously done anything that directly or indirectly indicated what view the decision-maker took, or would or might take, in relation to a matter.

		Rise Building Zones				<p>(2) A decision-maker is not to be taken to have had, or to have appeared to have had, a closed mind when making the decision just because—</p> <p>(a) the decision-maker had previously done anything that directly or indirectly indicated what view the decision-maker took, or would or might take, in relation to a matter, and (b) the matter was relevant to the decision.</p> <p>The effect is to make clear it is legally acceptable for persons deciding planning applications to confer with persons living in the vicinity of them. Contrary to the leader of the Council's assertion:</p> <p>....that there are protocols in place which prevent our taking an active interest and you may inadvertently lobby a member of the committee who will decide [an] application.</p> <p>On page 29</p> <p>6 Place-based Strategy for Hampton &amp; Hampton Hill states:</p> <p>Overall strategy p30 :</p> <p>Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance.</p> <p>Vision p30:</p> <p>The characteristic local urban scale and rural feel with its parks, green spaces and riverside, will be retained. The 'local urban scale' surrounding the St Clare business Park site is predominately 2 storeys with one exception 3.</p> <p>P31</p> <p>Future development in this place is expected, where relevant, to:</p> <p>.....There is an opportunity to establish distinctive landmarks, without recourse to tall buildings, to improve legibility, focused along main roads and at key junctions. St Clare is neither on a main road nor at a key junction. and at the bottom of P31 it lists:</p> <p>There are some development sites that if they are brought forward, or permissions implemented, may provide for redevelopment or new development. At Carpark for Sainsburys, Uxbridge Road, Hampton (Site Allocation 4) there is potential for affordable housing and restoration and enhancement of the river corridor.</p> <p>The criteria for allocating sites for mid-rise buildings are as follows as set out in the Urban Design Study 2023.</p> <p>"The strategy map for tall and mid-rise buildings focuses on:</p> <ul style="list-style-type: none"> <li>• The five town centres (Teddington, Whitton, Twickenham, Richmond and East Sheen);</li> <li>• Areas with existing tall buildings, including on the riverside at Hampton Wick and in Barnes on the boundary with LB Wandsworth</li> <li>• Known areas with emerging masterplans or redevelopment opportunities such as North Sheen, the Stag Brewery site and Kew Retail Park;</li> <li>• Site allocations where relevant, including Twickenham Stadium, The Stoop and in Ham;</li> <li>• Areas along strategic routes where there could be potential for increases in height through mid-rise buildings (Hanworth Road), whether the existing character is less consistent." <p>The mid-rise allocation to Hampton Hill does not meet any of the criteria. From the Urban Design Study 2023, the following criteria are set out for the location of mid-rise buildings:</p> <p>"Fig.376 is a map of zones with potential to accommodate mid-rise buildings.</p> <p>Overall, Richmond borough has some capacity for midrise buildings across the borough. Opportunities for mid-rise buildings are generally:</p> <ol style="list-style-type: none"> <li>1. transition areas to tall building zones: The majority of tall building zones have mid-rise building transition zones around them to provide appropriate stepping and integration to surrounding small scale built form;</li> <li>2. within town centres: There are opportunities for mid-rise buildings within the town centres of Whitton, Teddington, Twickenham, Richmond and East Sheen;</li> <li>3. within or adjacent to existing estates: This includes opportunities within Edgar Road in Whitton, Broom Park in Hampton Wick and Ham Close in Ham.</li> <li>4. close to strategic roads: including at the Stoop on A316 Chertsey Road, and in North Sheen on Lower Richmond Road." <p>The site at Hampton Hill does not meet any of these criteria. Hampton Hill is designated as a local centre in the draft Plan and nowhere in that Plan are local centres identified as suitable for mid-rise developments.;</p> <p>In the overall strategy, Hampton Hill is defined as Area 4. The area has a high sensitivity for change owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green and the strategy is to conserve and enhance. It will not be possible to place a mid-rise 15m high building within this area without causing harm and failing to conserve and enhance.</p> <p>No attempt has been made in the Regulation 19 document to apply any of the criteria set out above to justify the designation of this land as suitable for mid-rise development. If these criteria had been applied, the site would not have been designated.</p> <p>There is reference to Hampton Hill having a high sensitivity for change owing to the high townscape value of much of the area, the consistent building heights, suburban character and sense of green.</p> </li></ol></li></ul>	To make The Plan consistent with other policies remove St Clare (Hampton Hill): Mid-Rise Building Zone Appropriate Height: 5 storeys (15m) from Appendix 3 Tall and Mid-Rise Building Zones	
116	Sarah Hitchman	St Clare mid-rise zone		N	N	Positively Prepared; Justified	Page numbers 29-31 and 413-416. Policy no/name: Appendix 3 Tall and Mid Rise Buildings. Place based strategy: Page 29 and following, place based strategy for Hampton and Hampton Hill. Maps: St Clare (Hampton Hill): Mid-rise Building Zone Appropriate Height 5 storeys (15m).	The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval.

							Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green and the strategy is to conserve and enhance. and there is an opportunity to establish distinctive landmarks without recourse to tall buildings. However appendix 3 states 'St Clare (Hampton Hill) appropriate height 5 storeys.' The area around St Clare is a 2 & 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.	
117	Theodorus Janssen	St Clare mid-rise zone		No	No	Positively Prepared; Justified	Page no.s 29 - 31 and 413 - 416 - 28.14 - Policy no. Appendix 3 - Tall and mid-rise building zones Maps St Clare (Hampton Hill): Mid-Rise Building Zone Appropriate Height: 5 storeys (15m) 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 & 3 storey victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill.	The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval.
118	Bettina Rix	St Clare mid-rise zone					With reference to the new Local Plan, appendix 3 , st Clare's, Hampton Hill, it states that this area is suitable for 5 storeys. I strongly object to this as it is within a residential area of mainly 2 storey, Victorian terraces, and 5 storeys would not be in keeping with this architecture. It would be domineering in the neighbourhood and impact negatively on the sight lines, skyline and privacy of neighbouring houses. Please keep me updated on the Local Plan.	
119	Joe Cunnane (Cunnane Town Planning), <b>Hampton Hill Residents</b>	Pages 29-31, 240 and 413-416 Page 29 and following...Place Based strategy for Hampton and Hampton Hill Appendix 3 Tall and Mid-Rise Building Zones St Clare (Hampton Hill): Mid-Rise Building Zone Urban Design Study Executive Summary and Figure 376 paragraph 4.6.3	Yes	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	On page 29 <b>6 Place-based Strategy for Hampton &amp; Hampton Hill states:</b> <b>Overall strategy p30 :</b> Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance. <b>Vision p30:</b> The characteristic local urban scale and rural feel with its parks, green spaces and riverside, will be retained. The 'local urban scale' surrounding the St Clare business Park site is predominatly 2 storeys with one exception 3. <b>P31</b> Future development in this place is expected, where relevant, to: .....There is an opportunity to establish distinctive landmarks, without recourse to tall buildings, to improve legibility, focused along main roads and at key junctions. St Clare is neither on a main road nor at a key jubction. <b>and at the bottom of P31 it lists:</b> There are some development sites that if they are brought forward, or permissions implemented, may provide for redevelopment or new development. At Carpark for Sainsburys, Uxbridge Road, Hampton (Site Allocation 4) there is potential for affordable housing and restoration and enhancement of the river corridor. The criteria for allocating sites for mid-rise buildings are as follows as set out in the Urban Design Study 2023. "The strategy map for tall and mid-rise buildings focuses on: • The five town centres (Teddington, Whitton, Twickenham, Richmond and East Sheen); • Areas with existing tall buildings, including on the riverside at Hampton Wick and in Barnes on the boundary with LB Wandsworth; • Known areas with emerging masterplans or redevelopment opportunities such as North Sheen, the Stag Brewery site and Kew Retail Park; • Site allocations where relevant, including Twickenham Stadium, The Stoop and in Ham; • Areas along strategic routes where there could be potential for increases in height through mid-rise buildings (Hanworth Road), whether the existing character is less consistent." The mid-rise allocation to Hampton Hill does not meet any of the criteria. From the Urban Design Study 2023, the following criteria are set out for the location of mid-rise buildings: "Fig.376 is a map of zones with potential to accommodate mid-rise buildings. Overall, Richmond borough has some capacity for midrise buildings across the borough. Opportunities for mid-rise buildings are generally: 1. transition areas to tall building zones: The majority of tall building zones have mid-rise building transition zones around them to provide appropriate stepping and integration to surrounding small scale built form; 2. within town centres: There are opportunities for mid-rise buildings within the town centres of Whitton, Teddington, Twickenham, Richmond and East Sheen; 3. within or adjacent to existing estates: This includes opportunities within Edgar Road in Whitton, Broom Park in Hampton Wick and Ham Close in Ham. 4. close to strategic roads: including at the Stoop on A316 Chertsey Road, and in North Sheen on Lower Richmond Road."	To make The Plan consistent with other policies remove St Clare (Hampton Hill): Mid-Rise Building Zone Appropriate Height: 5 storeys (15m) from Appendix 3 Tall and Mid-Rise Building Zones

						<p>The site at Hampton Hill does not meet any of these criteria. Hampton Hill is designated as a local centre in the draft Plan and nowhere in that Plan are local centres identified as suitable for mid-rise developments.</p> <p>In the overall strategy, Hampton Hill is defined as Area 4. The area has a high sensitivity for change owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green and the strategy is to conserve and enhance. It will not be possible to place a mid-rise 15m high building within this area without causing harm and failing to conserve and enhance.</p> <p>No attempt has been made in the Regulation 19 document to apply any of the criteria set out above to justify the designation of this land as suitable for mid-rise development. If these criteria had been applied, the site would not have been designated.</p> <p>There is reference to Hampton Hill having a high sensitivity for change owing to the high townscape value of much of the area, the consistent building heights, suburban character and sense of green.</p>							
-						<b>Site Allocation 1: Hampton Square, Hampton</b>							
120	Richard Carr, <b>Transport for London (TfL)</b>	Site Allocation 1 Hampton Square, Hampton				<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Site Allocation 1: Hampton Square Hampton</td> <td>The requirement to retain adequate car parking to meet the needs of the community centre and new uses should be modified by stating that car parking should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards.</td> <td>Although we welcome the reference to car parking provision in line with London Plan standards, the use of the word ‘retain’ could be misinterpreted as requiring the existing level of provision. London Plan Policy T6 part B states <i>that ‘Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’).</i> Part L states that <i>‘Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.’</i> Therefore, to be consistent with London Plan Policy T6 the site allocation should be amended as follows: <b>‘retain minimise</b> car parking provision in line with <b>current</b> London Plan standards.’</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Site Allocation 1: Hampton Square Hampton	The requirement to retain adequate car parking to meet the needs of the community centre and new uses should be modified by stating that car parking should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards.	Although we welcome the reference to car parking provision in line with London Plan standards, the use of the word ‘retain’ could be misinterpreted as requiring the existing level of provision. London Plan Policy T6 part B states <i>that ‘Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’).</i> Part L states that <i>‘Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.’</i> Therefore, to be consistent with London Plan Policy T6 the site allocation should be amended as follows: <b>‘retain minimise</b> car parking provision in line with <b>current</b> London Plan standards.’	
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121	David Wilson, <b>Thames Water</b>	Site Allocation 1 Hampton Square, Hampton				<p>Thames Water <b>Site ID</b> 49793</p> <p><b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority’s aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan.</p> <p><b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority’s aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan.</p> <p><b>Additional Comments:</b> To provide a more detailed response we will require information on the scale of development.</p>							
-						<b>Site Allocation 2: Platts Eyot, Hampton</b>							
122	Kay Collins (Solve Planning), <b>Port Hampton Estates Limited</b>	Site Allocation 2 Platts Eyot, Hampton				<p>We represent Port Hampton Estates Limited who are the owners of Platt’s Eyot (Site Allocation 2). We wish to make the following comments on the Publication (Regulation 19) Consultation Version published for consultation in June 2023.</p> <p><b>Site Allocation 2: Platt’s Eyot, Hampton</b></p> <p>This relates to the specific allocation of Platt’s Eyot and reflects the existing adopted policy. There are a few comments we wish to make that would ensure the allocation better reflects the existing situation on the site.</p>							

						<ul style="list-style-type: none"> <li>• Under existing land uses this should reflect that the site already has a cottage in residential use</li> <li>• Planning history should reflect that discussions have taken place with the landowner in this section of the policy - The Council is committed to working in partnership with the site owners and Historic England to develop a Masterplan or development brief for the island. Regeneration should maintain, and where possible enhance, existing river-dependent and river-related uses. New business and industrial uses that respect and contribute to the island's special and unique character are encouraged. Some residential development may be appropriate where it enables for restoration of the listed buildings, especially those on the Heritage At Risk Register.</li> <li>• Reference in the text to "Very limited vehicular access" does not reflect the vehicular access that exists today via a bridge from the northern bank of the Thames. This should refer to the fact that improved vehicular access for servicing will be required to support and facilitate the redevelopment of the island referred to in this allocation. Other than these comments, we are not seeking further revisions to the Site Proposal as we consider it to be a positive framework for regeneration on the island. We note that our comments made to the previous draft of the plan have been incorporated into the text of this allocation.</li> </ul>	
123	David Wilson, Thames Water	Site Allocation 2 Platts Eyot, Hampton				<p>Thames Water <b>Site ID</b> 54326 (Reviewed Jan18)</p> <p><b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan.</p> <p><b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan.</p> <p><b>Additional Comments:</b> To provide a more detailed response we will require information on the scale of development.</p>	
124	Rachel Holmes, Environment Agency	Site Allocation 2 Platts Eyot, Hampton				<p><b>Site allocation 2 – Platts Eyot</b></p> <p>We welcome that, in line with our Regulation 18 Consultation response, the Sequential Test Report (dated April 2023) now describes the proposed use of the site as 'more vulnerable' due to the potential residential use. The site allocation also notes 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'. We would like to highlight that the Environment Agency is not responsible for assessing safe access and egress. However, we would welcome being referenced in association with the works to determine whether the site should be designated as Flood Zone 3b, in line with Paragraph 16.66.</p> <p>We understand the Local Planning Authority's reasoning for not including additional references to flood risk requirements due to these aspects already being included within other policies.</p>	
125	Suzanne Parkes, Elmbridge Borough Council	Site Allocation 2 Platts Eyot, Hampton				<p><b>Place-based Strategy for Hampton &amp; Hampton Hill</b></p> <p><b>Site Allocation 2 – Platts Eyot</b></p> <p>The boundary between Richmond and Elmbridge is separated by the River Thames and is an area sensitive to development given the swathe of open spaces, historic sites, important habitats for wildlife and generally lower densities of development.</p> <p>Overall, EBC considers that these important features are recognised within the place-based strategy in terms of the Vision and Policies and that this has been carried through to the specific site allocations where relevant. Of particular interest to EBC, given the site sits on our shared boundary, is Site Allocation 2 – Platts Eyot. It is noted that the area is proposed for regeneration for new business and industrial uses including residential development that should complement and enhance the island.</p> <p>In our response to the Pre-Publication Regulation 18 Consultation, EBC raised the issue that the property areas around Platts Eyot are Flood Warning Areas as identified in EBC's Strategic Flood Risk Assessment Level 1 (2019). Therefore, caution should be given to any intensification which could otherwise increase flood risk and impact flow routes of the functional floodplain and we asked for capacity details, and timescales for delivery.</p> <p>EBC therefore welcomes that any proposed 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. A challenge, that may limit the amount of residential development appropriate on the site.</p> <p>The inclusion of an expected implementation timetable is also welcome however, as previously raised and set out above, it would be useful for an indicative level of development both in terms of employment floorspace and number of homes to be given.</p> <p>It is also noted that the allocation states that, "The Council is committed to working in partnership with the site owners and Historic England to develop a Masterplan or development brief for the island." As requested at the Duty to Cooperate meeting on 10 July 2023, EBC would like to be engaged throughout the preparation of the Masterplan or Development Brief.</p>	



-						<b>Site Allocation 3: Hampton Traffic Unit, 60-68 Station Road, Hampton</b>							
126	David Wilson, <b>Thames Water</b>	Site Allocation 3 Hampton Traffic Unit, 60-68 Station Road, Hampton				<p>Thames Water <b>Site ID</b> 62517</p> <p><b>Water Response:</b> On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Additional Comments:</b> As this is a brownfield site, there may be public sewers crossing or close to the development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that the development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes</a>.</p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes</a>.</p>							
-						<b>Site Allocation 4: Car Park for Sainsburys, Uxbridge Road, Hampton</b>							
127	David Wilson, <b>Thames Water</b>	Site Allocation 4 Car Park for Sainsburys, Uxbridge Road, Hampton				<p>Thames Water <b>Site ID</b> 75256</p> <p><b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan.</p> <p><b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan.</p> <p><b>Additional Comments:</b> To provide a more detailed response we will require information on the scale of development.</p>							
128	Richard Carr, <b>Transport for London (TfL)</b>	Site Allocation 4 Car park for Sainsburys, Uxbridge Road, Hampton				<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Site Allocation 5 [now Site Allocation 4]: Car park for Sainsbury's, Uxbridge Road, Hampton</td> <td> <p>Bus services in both directions serve a bus stop on this site that is alongside the existing store. The site allocation should make it clear that the bus stop must be retained in any redevelopment.</p> <p>The statement that parking is expected to be re-provided for the adjacent food store should be modified by stating that car parking should be minimised as part of any redevelopment consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards. London Plan Policy T6 states that</p> </td> <td> <p>We welcome the additional requirement that bus stop S should be retained. Although we welcome the reference to London Plan standards to be consistent with London Plan Policy T6 we recommend that the wording is amended to read 'Parking provision <del>to London Plan standards</del> is expected to be provided including reprovision for the adjacent supermarket <b>in line with current London Plan standards.</b>'</p> <p>We welcome the requirement for rapid charging hubs and/or hydrogen fuelling facilities at the retained petrol station.</p> </td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Site Allocation 5 [now Site Allocation 4]: Car park for Sainsbury's, Uxbridge Road, Hampton	<p>Bus services in both directions serve a bus stop on this site that is alongside the existing store. The site allocation should make it clear that the bus stop must be retained in any redevelopment.</p> <p>The statement that parking is expected to be re-provided for the adjacent food store should be modified by stating that car parking should be minimised as part of any redevelopment consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards. London Plan Policy T6 states that</p>	<p>We welcome the additional requirement that bus stop S should be retained. Although we welcome the reference to London Plan standards to be consistent with London Plan Policy T6 we recommend that the wording is amended to read 'Parking provision <del>to London Plan standards</del> is expected to be provided including reprovision for the adjacent supermarket <b>in line with current London Plan standards.</b>'</p> <p>We welcome the requirement for rapid charging hubs and/or hydrogen fuelling facilities at the retained petrol station.</p>	
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						<p><i>'Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London'.</i></p> <p>We note that the existing petrol filling station is expected to be retained or re-provided. London Plan Policy T6 states that <i>'New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities'.</i></p>	
129	Anna Stott (WSP), Sainsburys Supermarkets Ltd	Site Allocation 4 Car Park for Sainsburys, Uxbridge Road, Hampton	No	Justified; Consistent with national policy	<p><b>Draft Site Allocation 4 - Car Park for Sainsburys, Uxbridge Road, Hampton</b></p> <p>In our previous Regulation 18 representations we were supportive of the allocation's removal from MOL land designation and the reprovision of the car park and Petrol Filling Station (PFS). However, we requested that the allocation remove reference to 100% affordable housing provision and recommended that the affordable housing levels set out in draft policy 11 should apply to the site. Unfortunately, the current draft allocation remains unchanged and we strongly suggest that the Council reconsiders this as the Plan will be unsound for the following reasons.</p> <p>Firstly, the draft allocation still states that "the exceptional circumstances" justifying the MOL release are set out under Policy 11 to meet the identified affordable housing needs of residents and, therefore, any future development scheme coming forward for this site should deliver 100% on-site affordable housing.</p> <p>In short, the drafting states that the development of the site for affordable housing is the exceptional circumstance justifying the site's removal from MOL. This is not correct. The tenure of the residential units has nothing to do with the exceptional circumstances justifying removal from MOL. The exceptional circumstances which allow the site's removal from MOL is the fact that it is an existing foodstore car park and PFS.</p> <p>The council's own evidence base provides the justification for the removal of the site from MOL. The 'Metropolitan Open Land Review Annex Report', dated 26th August 2021, prepared by Arup, identifies the Sainsbury's car park site as forming part of MOL 'Parcel 1' which is known as 'Longford E and Schools'. Against the London Plan MOL criteria the northern tip of Parcel 1, where the Sainsbury's car park is located, scores weakly.</p> <p>For criterion 1, 'contributes to the physical structure of London by being clearly distinguishable from the built-up area' this part of the parcel is noted as being <i>"completely eroded and therefore scores weak (1)"</i>.</p> <p>For criterion 2, 'includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London' this part of the parcel is noted as being the <i>"developed northern tip and inaccessible Longford River corridor offers no open-air facilities"</i>.</p> <p>For criterion 3, 'contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value' there is no public access or public right of way but the Longford River is designated as a SINC and so the parcel scores weak moderate (2) for this criterion.</p> <p>For criterion 4, 'forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria' the site is noted for <i>"hard standing in the northern tip is likely to provide no wildlife value"</i>.</p> <p>Overall, the Parcel 1 is considered to meet its MOL purposes, but the report says <i>"however, the developed northern tip and the northern part of the Longford River performs weakly against all MOL criteria" and "it is recommended the MOL status of the developed northern part of the parcel, and the northern part of the Longford River without adjacent green space is considered further"</i>.</p> <p>This evidence base document is the justification and demonstration of an exceptional circumstance to allow the site's removal from the MOL.</p> <p>The site's designation as MOL is a historical oversight and needs to be rectified regardless of future development. In addition, the requirement for 100% affordable is not sufficiently justified, nor is it viable, and it is contrary to the draft policy 11 on affordable housing, which does not require 100% affordable housing.</p> <p>We also requested to remove all references to requiring 20% biodiversity net gain (BNG). The references should be amended to require 10% BNG, in accordance with The Environment Act 2021.</p> <p>The draft site allocation has also retained a 20% measurable (BNG) requirement towards restoring the Longford River wildlife corridor in accordance with the Richmond Biodiversity Action Plan.</p> <p>[See comment 487 in relation to Policy 39 Biodiversity and Geodiversity]</p> <p>The allocation should also be amended to refer to 10% BNG to align with the requirements of the Environment Act and to ensure the viability of future development.</p>	<p>Moving forward, the emerging Local Plan for submission should include the following:</p> <ul style="list-style-type: none"> <li>▪ Allocation 4 – Reword the reasoning for the site being removed from MOL designation. The current wording is not correct and is misleading as it ties removal from MOL with future housing provision which is not the case. MOL removal is due to the site's existing use as a foodstore car park and petrol filling station.</li> <li>▪ Allocation 4 – Remove reference to 100% affordable housing requirement and replace with affordable housing levels set out in draft policy 11.</li> <li>▪ Allocation 4 – Remove reference to 20% BNG. The requirement for BNG should reflect Policy 39, which itself should be amended to require 10% BNG, in accordance with The Environment Act 2021.</li> </ul>	



130	John Sadler, <b>CPRE London</b>	Site Allocation 4 Car Park for Sainsburys, Uxbridge Road, Hampton		No		Effective	Site Allocation 5: The Uxbridge Road Sainsbury. [now Site Allocation 4] This should be a mixed-use development with no surface car parking which is an inefficient use of space and promotes car use.	
-							<b>Site Allocation 5: Hampton Telephone Exchange (Molesey Telephone Exchange, 34 High Street, Hampton, TW12 2SJ)</b>	
131	David Wilson, <b>Thames Water</b>	Site Allocation 5 Hampton Telephone Exchange					Thames Water <b>Site ID</b> 75258 <b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan. <b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan. <b>Additional Comments:</b> To provide a more detailed response we will require information on the scale of development.	
-							<b>Place-based Strategy for Teddington &amp; Hampton Wick</b>	
132	Peter Thompson, <b>National Physical Laboratory (NPL)</b>	Vision for Teddington and NPL	Yes	Yes	Yes		Thank you for the opportunity to respond to the Draft Local plan for Richmond. I am writing on behalf of the National Physical Laboratory (NPL), and our people. As a science and engineering national laboratory, which has been based in Teddington since 1900 there are two areas we would like to issue our contribution under: 1. A response to the plan in terms of our people, our site and facilities and how they could be used for local benefit 2. A response to the plan in terms of the scientific input we could provide The <b>overall vision for Teddington</b> , where our main site is located, is incredibly important to us. Being in a town which continues to provide "a community for residents, visitors and business which enjoys links to open spaces, the historic Royal Parks and the River Thames" is something that makes our organisation stand out. As an organisation with 1000+ employees we are keen to work alongside Richmond Council to ensure we can continue to recruit and retain employees from both inside and outside the borough, while positively impacting in other areas of the plan. One of the challenges of being in Southwest London, however, is the high cost of housing. The inclusion of section 19 therefore is welcomed. Specifically - <b>Affordable housing (Policy 11), Supporting our centres and promoting culture (Policy 17) and protecting the local economy (Policy 21) and Promoting jobs and our local economy (Policy 22)</b> speak directly to this and supports our ability to bring employees into the borough, who in turn contribute to the local economy through the regular use of the high street and its many businesses. It would be helpful to see more about the travel plans within the borough and for those who commute to our site. While Teddington is accessible to London via the main line station, many of our employees travel from the Southeast/West and find our location difficult to access via public transport. With house prices and rent so high in Teddington and the Borough, commuting long distances by car is often the only option. Opening Teddington up to more main line stations through increased public transport options would support people commuting and help with the upcoming ULEZ restrictions, which may lead to some employees simply being unable to afford to work for us anymore. [See comments 415, 420, 452, 553 and 560 in relation to other parts of the Plan] I'd like to close this response with thanks to the Council for recognising NPL as a significant asset and one of the borough's nationally important scientific institutions. We are proud members of the community in Teddington and relish the opportunities available to us to engage with local businesses, schools, neighbours and the wider community to ensure they too are proud of the work we do. We are delighted that so many of those who apply for, and attend, our work experience programme as well as undertake apprenticeships with us are from the local area. We strive to provide the best possible opportunities for young people to enter careers in science, engineering and technology and hope to welcome many more to the organisation during the period of this plan.	
133	Katherine Drew, <b>The Royal Parks</b>	Place-based Strategy for Teddington & Hampton Wick - specific to biodiversity and the Royal Parks'					In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again. [See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comments 301 and 302 in relation to protection of open space and risks]	

		Environmental Designations					
134	Graeme Fraser-Watson	Teddington mid-rise zone			Justified; Effective	<p>Objection to designation of mid-rise zone in Teddington.</p> <p>I am pleased that The Study recognises in Teddington Residential the uniform street patterns, consistent building quality, and prevalent green infrastructure contribution to the area's distinctive suburban character, with overall a high sensitivity to change and that the strategy is to conserve the existing character. I also applaud many of the expected developments, HOWEVER I object strongly to the the designation of the area along the railway line north of Teddington station, across the junction of Station Road / High Street as a zone for mid-rise buildings.</p> <p>I believe that this is totally inappropriate and this designation should be deleted from the plan.</p> <p>The borough is characterised by primarily low to medium rise buildings which has produced very attractive townscapes and is important to the borough's distinctive character. We have examples in Teddington (notably Harlequin House and the Travelodge) which are right in the centre of Teddington and are quite out of keeping with the surrounding area and buildings. These were clearly mistakes of the past and, in support of maintaining and improving the attractiveness of Teddington, it is important that such mistakes are not compounded by inappropriate new developments.</p> <p>To designate an area as a Mid-Rise zone will only encourage developers to assume that they can build 5/6 storey buildings in this area – which may be entirely inappropriate. To not have a mid- rise zone in Teddington does not mean that mid-rise buildings cannot be considered in Teddington. They may still be considered in areas that are not designated as Mid-Rise zones. We are not against 5/6 storey buildings being considered in appropriate settings but we are against the assumption that buildings in a particular zone should be 5/6 storeys high. By creating a Mid-Rise zone this is exactly what will happen.</p> <p>I do however believe that the areas near Teddington Station that are now industrial sites should remain as such to enable local employment and, as such I support the designation of Teddington Business Park, Station Road as a Locally Significant Industrial Site (LSIS) (section 19.29) and that Policy 24 includes "there is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused".</p>	
135	Howard Dix	Teddington mid-rise zone				<p>Teddington Station Road, p.48 includes:</p> <p>'There is an identified opportunity for mid-rise buildings in the area along the railway line north of Teddington Station, across the junction of Station Road/High Street in accordance with Policy 45 Tall and Mid-Rise Building Zones.'</p> <p>The plan doesn't state how the 'identified opportunity' has come about, there is a lack of transparency around this. The existing low rise structures (garden centre and business park units blend well with the Station Road residential area. The area is unsuitable for tall/mid-rise buildings (5/6 storey) and would be detrimental to the high street and Station Road residents. Although the development at the railway bridge (Informer House) has been allowed this should not in anyway set a precedent to introduce buildings of similar height and repeat past mistakes in allowing such buildings as the Travel Lodge and Elmfield House to be built. Any proposals for the area should be judged on their own merits and should be decoupled from any strategy about tall/mid-rise development.</p>	
136	John Danby	Teddington mid-rise zone		No	Justified	<p>Section 7: Place Based Strategy for Teddington &amp; Hampton Wick page 48 (last paragraph)</p> <p>Section 19.29: Designation of Teddington Business Park as a Locally Significant Industrial Site (LSIS) page 262/263</p> <p>Section 28: Appendix 3 Tall &amp; Mid-Rise Building Zones (page 413)</p> <p>I object to the designation of the area along the railway line north of Teddington station, across the junction of Station Road / High Street as a zone of Mid-Rise buildings.</p> <p>Teddington is primarily low rise building. These give an attractive townscape important to Teddington's character. The current taller buildings in the centre of Teddington (eg Travelodge, Harlequin House) are out of keeping with the rest of the town and are poorly placed.</p> <p>Designating an area as Mid-Rise may attract developers to an area that is already in use presuming that they will be able to build on that site. Mid-Rise buildings will impinge on the domestic, low rise aspect of the station, Station Road, Park Road and The Cedars and further split the town into two.</p> <p>The areas near Teddington station that are already industrial sites should remain as such. In Section 19.29 Teddington Business Park is designated as a Locally Significant Industrial Site (LSIS) and Policy 24 states "there is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused". Clearly there is a contradiction in the Plan in this regard.</p>	The designation of the area along the railway line north of Teddington station, across the junction of Station Road / High Street as a zone of Mid-Rise buildings should be deleted from the Plan
137	Claudette Eldridge	Teddington mid-rise zone				<p>Buildings by Teddington bridge</p> <p>How disgraceful of you to even consider this obscene plan.</p> <p>I bet none of you live there.</p> <p>I grew up and lived for 60 years in Teddington.</p> <p>You should be ashamed.</p>	
138	Jo Gourlay	Teddington mid-rise zone				<p>I am very concerned about this proposal and how it would undoubtedly damage the unique character of Teddington, one of the few unspoilt areas locally. The higher-rise buildings would be out of keeping with the area and make it a much less pleasant area. I do hope our views are considered in this.</p>	
139	Hannah Mackenzie	Teddington mid-rise zone				<p>I write to express concern about the designation of an area along the railway line, north of Teddington station, up to and over the bridge, as a "mid-rise zone" and considers that a line of buildings at this height (up to 6 storeys). This would change the character of the town. It would not conserve or enhance it. I share the view of the Teddington Society that any new planning application should be considered on its merits and that there should not be a presumption that any building of up to six storeys is permitted in a particular zone.</p>	

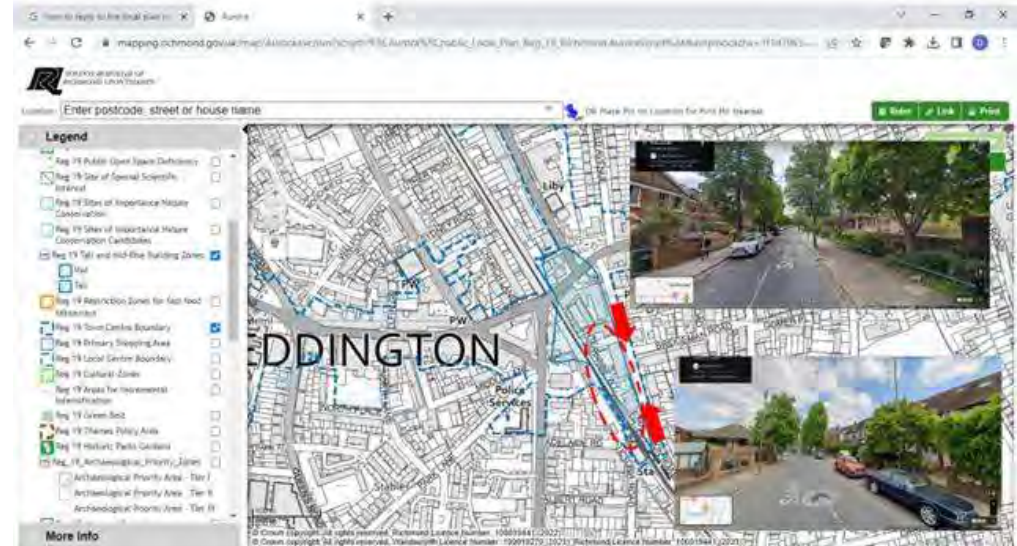
140	Hardy Giesler	Teddington mid-rise zone		No	No		<p>I am objecting to the Local Plan - Section 7: Place Based Strategy for Teddington and Hampton Wick (page 48) and Section 28: Appendix 3 Tall and Mid-Rise Building Zones (page 415).</p> <p>In your overview strategy, you mention Teddington having 'a high sensitivity to change owing to the high townscape value and consistency in scale and height of existing buildings'. It is therefore surprising that you suggest a 'mid-rise zone' of buildings with 5 or 6 storeys along the railway line north of Teddington station up to and over the bridge'. This area is the main link between the High Street and station, a corridor of mainly residential buildings and a low-rise business park. My objection is on two counts:</p> <ul style="list-style-type: none"> <li>- The area is almost entirely residential – with the exception of the business park and mid-rise zone buildings would destroy the residential environment;</li> <li>- The existing business park serves a valuable purpose and being a low-rise development, fits in with the mainly residential neighbourhood;</li> </ul> <p>The only example of a mid-rise building on that street is the Travelodge hotel. It is located towards the High Street end of Station Road, which lessens the impact of the building to a degree (since the buildings in the High Street are generally higher than the residential buildings). The building is also a complete eyesore – it seems to have been erected using cheap construction materials and is 'adorned' with multiple installations of telecoms equipment on the roof, much of which is obsolete, I believe.</p> <p>My wife and I own a property in <b>[Teddington road name removed for data protection]</b>, which we plan to retire to in future. Please register our objection to the proposal of a 'mid-rise zone' of buildings along Station Road.</p>	
141	Jennifer Kelly	Teddington mid-rise zone					<p>I would like to register my concern about the current proposals for the local plan in the area of Teddington high street and railway line.</p> <p>Whilst I appreciate there is the precedent and need for building around the existing business park and travel inn, I am not comfortable and do not believe it is appropriate for this to cross over the road and encompass the area adjacent to Pizza express. This side of the road on either side of the railway line is much lower scale and primarily single home residential, and it includes buildings from a variety of periods many of which are good quality examples. There is no need or reason that high-level development should be considered for this side (south of high street). The danger is that once one building up to six stories is given consent others will follow, spreading down the arteries, and the small village character of Teddington, especially on the high Street and will be lost.</p> <p>Whilst I am fine with the possibility of higher level development on the north side of the road and to the west of the railway line. I believe there is no reason for it to cross to the south .</p>	
142	Nuala Orton	TEDDINGTON No further mid-rise zone buildings!	Yes	No	No	Justified	<p>Consult all Teddington residents regarding the proposed increase in the number of mid-rise buildings Publish the outcome</p>	As above
143	Anthony Kearney	Teddington mid-rise zone					<p>After reading the recent consultation letter I too reflect the concerns of the Teddington society as below and would like to express my disapproval.</p> <p><a href="#">The Teddington Society is concerned about the specific designation of this area as a mid-rise zone and considers that a line of buildings at this height would change the character of the town. It would not conserve or enhance it. Our view is that any new planning application should be considered on its merits and that there should not be a presumption that any building of up to six storeys is permitted. We are also concerned at the potential loss of Teddington Business Park, which provides much needed office and industrial space and is a valuable and well-designed asset to the town. There could also be a significant impact on the views from residential streets near the station, which is why we are alerting members to the proposal.</a></p> <p>I am a resident on <b>[Teddington address details removed for data protection]</b> and cannot see how a 6 storey residential block being erected on the business park is in anyway going to enhance the character of the street. The disruption to small businesses who are leaving the area at an alarming rate due to the drive for residential property is also a very big concern. I also work in the area and know how difficult it is to obtain any office or small industrial space in the borough . The Travelodge at the end of Station Road caused many drainage problems for months afterwards, have the implications for drainage on multiple occupancy flats been considered in this plan ?</p>	
144	Alison Campbell	Teddington mid-rise zone				Effective; Justified	<p>Teddington area - high buildings. Concerned with 'mid height' buildings reaching 5/6 floors high. The occasional building of this height on Park Rd or Station Rd may not dearf the surrounding pavements and buildings but a long row or several of these building would be overbearing and unpleasant. The flats around the Landmark centre are 3 occasionally 4 floors which seems less over bearing.</p> <p>Concerned at the potential loss of the industrial estate on Station Rd. It creates very little extra traffic and is one of the few areas for businesses to locate.</p>	Maintain the industrial estate.
145	Rosemary Perry	Teddington mid-rise zone					<p>I have lived in Teddington since Feb 1977. My house was one of the first to be built on the historic site of R.D. Blackmore's Farm which was cut in half in the 1850s when the railway came. The conservation areas including the Farm Workers Cottage round the corner started off the trend to preserve the old and Victorian properties abutting the Farm boundaries. You will know all this was achieved during the 20th Century. I was living through the Business Park which was built in 1980- 1982 approx. when British Rail sold off the Coal Yard.</p> <p>There is no need to block our airspace higher than it already is i.e. why do you insist on Mid and High Rise categories for this particular little area which was ruined by the Barclays Bank Training Centre - now a Travelodge Hotel which of course is very Tall as it was created upon the rise of the road bridge. More buildings in the last 40 years have been built</p>	

						<p>towards the Bridge at the top of Park Road. How can you call for more Mid and Tall Rise Buildings which already have replaced Informer House on the Bridge? The Cinema which became the AA Building on the corner opposite the charming old Post Office is bad enough and is converted into Offices already. You cannot be serious about the Garden Centre being a high rise building which puts the entire Station Road into jeopardy of being a residential road apart from the Business Park.</p> <p>Your Map for that part of Teddington is littered with TPOs, conservation areas etc. and I would urge you not to alter the skyline any more.</p> <p>Leave that part of Teddington alone, enough damage has been done in my decades as a rate payer/Council Tax payer. Hoping you will reconsider inclusion of 5/6 storeys on the high bridge over the railway.</p>	
146	Roger Byatt	Teddington mid-rise zone				<p>Re Teddington town centre</p> <p>I support the Teddington Society's view that 5-6 storeys is far too high.</p> <p>Personally I find the Teddington Business Park e.g. Halfords very convenient and would prefer it to remain.</p>	
147	Kellie Coyne	Teddington mid-rise zone				<p>I would like to register an official objection to the Local Plan's intent to zone the area near Teddington station for mid to high rise buildings for the below reasons:</p> <ul style="list-style-type: none"> <li>* I own a home on <b>[Teddington road name removed for data protection]</b> and buildings of this type will significantly reduce the value of our home and will materially impact the local character of the area, street and entire town. It is not in keeping with the character and does not conserve or protect the local businesses or local residents.</li> <li>* It is currently a pleasant residential area of Teddington and should remain so. Many home owners have purchased in this area as they have young families and want a small village feel with the conveniences of London. Without the feel of high street areas like Twickenham or Kingston. Families and elderly will not benefit from such high rise buildings resulting in a material increase in foot and car traffic</li> <li>* Mainly pre-war, Edwardian and Victorian housing dominate this area and it is not meant to be a business venture, it's a neighbourhood with appropriate neighborhood businesses.</li> <li>* the current Business park is well designed to have a minimum impact on neighbours</li> <li>* Designating a 'zone' of mid-rise buildings of up to six storeys would encourage intensive development up to this permitted height in the whole zone area which would destroy the residential character and tremendous value living in this area of Teddington brings. The residents will not benefit from such imposing buildings.</li> <li>* it would Dominate the streets and cause noise and light pollution for the residents.</li> </ul> <p>It would significantly Damage this pre-dominantly low-rise residential area and the character of Teddington</p>	
148	Gillian Carrick	Teddington mid-rise zone				<p>I live in Teddington and I have to say the proposal would spoil the character of this lovely town, and what makes Teddington such a special place to live in.</p> <p>High rises have no place here. Please reconsider.</p>	
149	Carlo Malka	Teddington mid-rise zone				<p>I am writing to present my strong objection to the proposal to change the potential use of the business park by the railway line just north of Teddington station to "mid rise zone"</p> <p>One of the beauties of the way things are currently laid out is that there is a business park which is isolated enough to not cause any nuisance or visual injury because of the way it is laid out. If this zone were to be allowed to be built upon with mid rise flats, the impact on parking, local infrastructure and traffic along station road / Blackmores grove and Bridgeman road would be unbearable. Doctor's surgeries, local schools are both at overcapacity and would need to be expanded to accommodate the influx.</p> <p>Furthermore, the area around the business park is predominantly relatively upscale mainly single family residences and the injection of a large number of new residents would severely impact the character of the area. Any new buildings along the railway line would be unattractive to most current Teddington residents who enjoy a relatively quiet and genteel lifestyle.</p> <p>With the council's current obsession with providing affordable housing, this proposal if allowed to come to pass will have a negative impact on all current residents.</p>	
150	Charles Hide	Teddington mid-rise zone				<p>I would like to register my official objection to the Local Plan's intent to zone the area near Teddington station for mid to high rise buildings. The proposal has little to merit it and would be hugely detrimental to the local area and it's residents alike. The proposal brings seriously into question the integrity and good-sense of local planners who purport to work in the best interests of local communities. My objections are outlined as follows:</p> <ul style="list-style-type: none"> <li>• I am a local resident and a key attraction of the immediate area, as well as Teddington in general, is the generally considerate way in which it has been developed with commercial units on Station Road being low-rise and creating minimal traffic. Higher-rise development of the type the proposed zoning suggests would be an eye-sore for local residents, will block out the afternoon/evening sun which is very much enjoyed, will create a bottle-neck for traffic, and will cause a significant reduction in the value of residential properties.</li> <li>• The area surrounding Teddington Station is very popular for families as well as retired residents who have chosen the area as it is quiet and picturesque whilst also being close to local conveniences. A development of the sort suggested will significantly detriment the look and feel of the area which is so very valued by residents. There are large commercial hubs in Kingston and Twickenham as well as other nearby areas, there is no reason why Teddington should be over-developed. Furthermore the additional foot and vehicle traffic which would be inevitable would be a serious concern and potential hazard for the younger and older members of the community in particular.</li> <li>• The area is predominantly pre-war, with Edwardian and Victorian housing dominating the area. The area is very picturesque as a consequence and existing commercial units close to the station are unobtrusive, the area was never designed and it is not meant to be a high-rise commercial hub.</li> </ul>	

						<ul style="list-style-type: none"> <li>Designating a 'zone' of mid-rise buildings of up to six storeys would encourage intensive development up to this permitted height in the whole zone area which would destroy the residential character and tremendous value living in this area of Teddington brings. Only the developers themselves would benefit from such a proposal.</li> <li>A proposal of this sort would visually and culturally dominate the local area and streets and cause significant noise and light pollution for the residents.</li> </ul> <p>Teddington has been listed as a 'Best Place to Live' in London on more than one occasion and for very good reason, please don't spoil this special and unique town because of commercial greed.</p>	
151	Richard Goldfinch	Teddington mid-rise zone				<p>Regarding " There is an identified opportunity for mid-rise buildings in the area along the railway line north of Teddington Station, across the junction of Station Road/High Street in accordance with Policy 45 Tall and Mid-Rise Building Zones." I strongly object to this statement.</p> <p>This would destroy the character of the area especially if used for housing. The replacement of the business park, which provides employment, with housing is counter to other statements in the plan for Teddington, especially the Telephone exchange re-development.</p> <p>You only need to look at other parts of London redeveloped with high-rise housing eg Vauxhall, Feltham etc to see the what a disaster this type of development is. It provides a vision of a Blade-runner style dystopian future which I think everyone would wish to avoid happening elsewhere.</p> <p>I would also point out that there is no detail on this part of plan, seemingly hidden within the document, unlike possible development of other sites within Teddington such as the Telephone exchange etc.</p>	Keep development in Teddington low-rise and don't replace building currently providing employment with housing.
152	David Laughrin	Teddington mid-rise zone				<p>I am pleased that the council's strategy in the revised local plan is to conserve and enhance the town centre's character and function but am puzzled by the inclusion in the plan of a mid-rise zone north of Teddington station up to High Street on both sides of the railway line. This seems to be unsound in relation to the overall objectives and puts too much weight on overall GLA guidelines as opposed to local factors. While there must be possibilities for individual developments at mid-rise level adjacent to some of the existing mid-rise development, to give encouragement for a whole mid-rise zone in this area must risk over-development. This would put at risk the gains secured from the business park and completely change the character of the residential streets near the station. Individual proposals should in my view be considered on their merits against the council's overall strategy.</p>	
153	Safiya & B Atom-Ra	Teddington mid-rise zone				<p>We (2 residents) would like you to take this email as strong opposition to the tall and mid rise building zone and place based strategy for Teddington and Hampton Wick (section 28 &amp; 7).</p> <p>We believe this plan would greatly detriment us as residents and Teddington as a whole. Teddington is supposed to be a green borough and what you would be allowing is massive construction works getting rid of a garden centre and industrial space to fill it was a greater number of building and less open space. It will remove space for businesses meaning that local businesses can no longer occupy the space and provide for residents.</p> <p>Such a plan, would block sunlight for a good part of the day for many residents making gardens no longer suitable for many plants and the houses themselves would no longer be a homely place to live.</p> <p>Not to mention the parking nightmare that would ensue. There is already limited parking to residents and yet you want to allow 5/6 story building with residents and cars. What that will succeed in doing is driving residents away.</p> <p>Teddington often wins the best place to live awards because of its village like feel despite it's closeness to London. What you would be allowing is the destruction of this and the welcoming of big developments which will transform the area for the worse and make it lose it the very thing we are proud to be. You are opening the door to this no longer being a green borough and instead another town full of apartment buildings with no soul or community left.</p> <p>Overall it's very disappointing that this has even made it into the plan. Hopefully you will rectify and remove so we don't all have to move.</p>	
154	Robert Blakebrough	Teddington mid-rise zone				<p>I would like to raise my objection to the aspect of the Local Plan at Station Road and environs, Teddington as follows:</p> <p>I am concerned about the specific designation of this area as a mid-rise zone and considers that a line of buildings at this height would adversely change the character of the town, (as is illustrated in particular by the gruesome Travelodge Building already in existence). It would not conserve or enhance it. My view is that any new planning application should be considered on its merits and that there should not be a presumption that any building of up to six storeys is permitted at this location. I am also concerned at the potential loss of Teddington Business Park, which provides much needed office and industrial space and is a useful asset to the town without being over intrusive. There is also a consideration to the outlook for residential streets near the station which will be much changed including a significant negative change in light for both residents living locally and those using these streets. There is also likely to be an unwanted rise in traffic, servicing this much denser development, along station road which already suffers from frequent unsafe obstructions by lorries and vans unloading/loading to service Travelodge and Nandos Restaurant and private cars exiting and entering the Travelodge Car Park disrupting the flow of traffic.</p>	
155	Bouquette Kabatepe	Teddington mid-rise zone				<p>I would like to submit my rejection of the "Teddington local plan"</p> <p>I believe the proposed high rise buildings are extremely out of character, will bring huge additional traffic and population into a small town which is not designed for all all this.</p> <p>Our Surgeries, Schools, Dentists, Trains an and Busses are full beyond their capacities. The traffic and parking is already at a critical point.</p> <p>You know this yourselves because only recently you've introduced controlled parking zones to exactly these locations. Now you are claiming that these critical and already overstretched resources will not suffer? With heaven knows how many more additional people, additional cars additional pupils and NHS clients all things will come to a stand still. You will ruin Teddington. !</p>	


						Your "plan" is beyond comprehension, illogical and unacceptable. This is exactly why you will lose all your support in this town. Not long now, time to kick you out of the Council.
156	Greg Castell	Teddington mid-rise zone				6 storey buildings Local plan - Objections This is obviously a stupid suggestion and should be consigned to the bin ! Let's not build eyesores and unnecessarily throw dark shadows across Teddington. Please stop it.
157	Kerry Chauhan	Teddington mid-rise zone				No! No! No! This plan utterly destroys Teddington town centre. Previous plans have always considered the effect of development on the character of the small town. I have lived in Teddington for over 40 years and have seen it treble in size. The infrastructure - doctors, schools, sports , leisure etc - have been unable to keep up with demand. Absolutely no way should this plan even be considered.
158	Jo Lynn	Teddington mid-rise zone				I object to the proposal to rezone Station Road, Teddington to allow in principle six story developments. Teddington is widely known and fondly referred to as Teddington Village. Any such development will blight the street scape, the approach to the High Street, seriously detract from Teddington's reputation and will have a consequent adverse effect on property prices.
159	Nicky Smith	Teddington mid-rise zone				I object to the plans for more buildings and high rise block near Teddington Station.
160	P. J. Deakin	Teddington mid-rise zone				I am very concerned about the proposed Local Plan for Teddington, particularly the area around Teddington Station. The proposed 5-6 storey flats alongside the railway line will have a significant impact on the Grade 11 listed station and the surrounding attractive Victorian/Edwardian properties, especially if they are not of similar architecture. Teddington is already a high density area. Where will the Business Park go? The roads are already congested because of certain road closures, car parking reduced and shops in decline. Perhaps it would be preferable to have the infrastructure such as schools, facilities for Doctors and water supply etc. in place before anymore building is carried out.
161	Joanne Westeng	Teddington mid-rise zone				I am a long term Teddington resident and currently work in Teddington Business Park, an area under discussion in your planning department. I was horrified to learn recently of plans afoot to redevelop the area north of Teddington Station where Teddington Business Park is located. The ugly Travelodge building within this area is already an eyesore in this area and to think you are considering a development of six-storey blocks alongside the railway line is quite alarming. Light on the neighbouring residential areas would be limited and an already high traffic area would become a bottleneck. How many new residents in the area would be expected? Our schools, transport and medical facilities are already bursting and parking is very challenging. The Business Park is a thriving area which is a bonus for Teddington, housing local small businesses and bringing income to our small town. I hope you will reject this plan for redevelopment of the area and Teddington can retain its place as one of the best places to live in Greater London.
162	Jean Carlin	Teddington mid-rise zone				The plan to build Six Storey buildings in the area would change the character of Teddington forever. It's a great place to live please leave the area as it is now. It would be a big mistake we do not need tall buildings. Please listen to the people.
163	Ann Whitfield	Place Based Strategy for Teddington and Hampton Wick, Appendix 3 Tall and Mid-Rise Building Zones				I am submitting my response by email, as I found the online portal and online form overly complicated to submit a response through, as an individual with limited knowledge about planning matters. My comments relate to the following: <ul style="list-style-type: none"> <li>• Section 7: Place Based Strategy for Teddington and Hampton Wick (page 48)</li> <li>• Section 28: Appendix 3 Tall and Mid-Rise Building Zones (page 415)</li> </ul> The plan states that the council's strategy for Teddington is 'to conserve and enhance the town centre's character' including the protection of green space and the provision of spaces for local businesses, which I support. One of the key sites with development potential identified in the plan is for a 'mid-rise zone' along the railway line north of Teddington station up to and over the bridge. I am concerned about the specific designation of this area as a mid-rise zone, and I consider that a line of buildings at this height would change the character of the town. It would not conserve or enhance it. We already have some pretty unsightly high buildings in this area, and I wouldn't want to see any more. My think that any new planning application should be considered on its merits and that there should not be a presumption that any building of up to six storeys is permitted. I am also concerned at the potential loss of Teddington Business Park, which provides much needed office and industrial space and is a valuable and well-designed asset to the town. I would therefore request that the Local Plan is amended so that this area in Teddington is NOT defined as a 'mid-rise zone'.

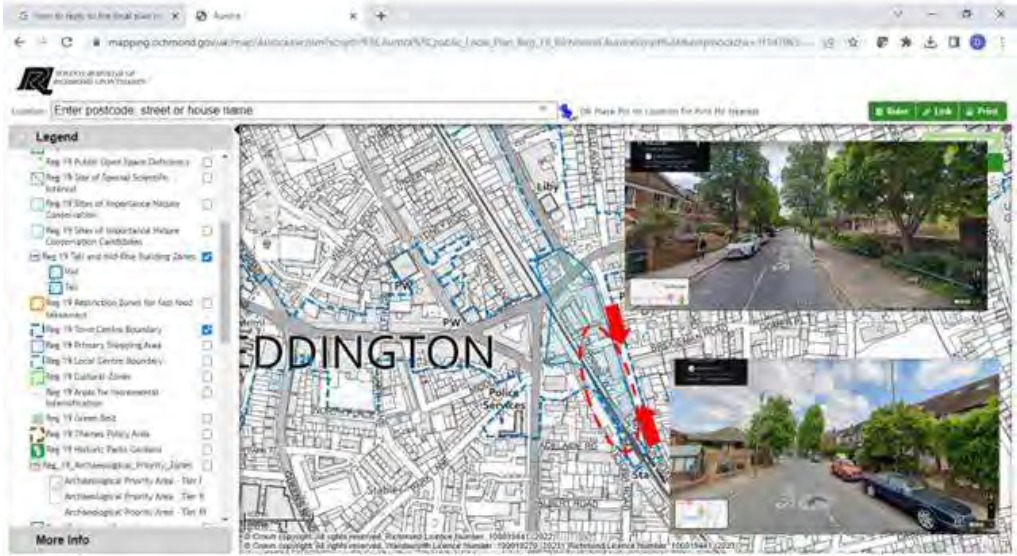



164	Angela Hogg	Teddington mid-rise zone				<p>I write to object to a mid rise development along Station Road from the garden centre and the Teddington Business park on the grounds that a line of buildings at this height would change the character of the town - it would not conserve or enhance it and there would be significant impact on the light to my property in <b>[Teddington address details removed for data protection]</b>.</p> <p>I would not object to any development of two stories.</p>
165	Stephen Mowat	Teddington mid-rise zone	No	Positively Prepared; Justified		<p>I am concerned about the designation of an area along the railway line, north of Teddington station, up to and over the bridge, as a "mid-rise zone" and any plan that considers a line of buildings at this height (up to 6 storeys) would change the character of the town. It would not conserve or enhance it.</p> <p>I wish to register my objection</p>
166	Denis Lawson	Teddington mid-rise zone				<p>I am very concerned about the new proposed 'mid-rise zone' which is currently being considered. I have lived in <b>[Teddington road name removed for data protection]</b> Teddington for over 30 years and whilst I appreciate that modernisation over time is beneficial, it has to be appropriate for the area and potentially building 5 or 6 storey units in Station Road is something that I strongly object to. In my view the proposed 'mid-rise zone' WOULD NOT conserve and enhance the town centre character.</p>
167	Christine Knight	Teddington mid-rise zone				<p>This is to register my objection to the idea of buildings being built in Station Road, Teddington of mid-rise height. I understand this could mean 5 or 6 storey buildings.</p> <p>There have been plans submitted before for buildings of 3 storeys and those have been rejected as unsuitable for the location. Particularly the Garden Centre. I am not sure why this is now acceptable.</p> <p>This is a quiet residential street on one side. The impact of any new buildings of any height more than the existing buildings will affect everyone already in the road. There will be a loss of light in the evenings and a very great impact on the visual aspect of the road. The business park is a very well shielded development. And as parking is very difficult in this area, I am sure the development will increase this problem.</p> <p>Please do not approve this change to this area. It will impact everyone in Station Road.</p>
168	Jean Strachan	Teddington mid-rise zone				<p>ref proposal to build housing on the site currently occupied by Teddington Trading Estate</p> <p>Whilst I am very aware that we must build more residential housing and I support the Richmond Council in its efforts to find suitable sites for this purpose I am concerned that the proposal for Station Road would only be possible if the existing buildings are demolished. If this happens businesses &amp; jobs will be lost which does not seem a constructive way forward unless the Council has already identified suitable alternative accommodation acceptable to all parties affected.</p> <p>Next I am very concerned that any residential building on that site should reflect the existing residential area which is of two storey houses built in the previous century &amp; before. Any houses or flats exceeding the height of that traditional housing will be thoroughly out of place, particularly in a conservation area designated as such to preserve the architectural character &amp; its history.</p> <p>And one of my major issues is that the council prioritises AFFORDABLE housing. The most pressing need is for properties with affordable rents, preferably social housing, avoiding private landlords with only profits in mind &amp; minimum maintenance. Houses for sale will not meet the needs of people who cannot &amp; probably never will be able to afford a mortgage. We have a duty to support a wide &amp; varied community particularly those who provide many of our support services &amp; enable us to live in a civilised society.</p>
169	Dave Gilbert	Teddington mid-rise zone	No	Positively Prepared; Justified		<p>I would like to suggest the proposal to allow an extended area of 'mid-size'/6 storey buildings in central Teddington should be modified or dropped.</p> <p>Teddington is a residential area of pleasant character which could change with the proposal. In particular Station Rd could be unreasonably affected by allowing 6 storey development on its west side as shown by the pictures below. Only 2-3 storey development would be in keeping with the character of the area in the red dotted area.</p>  <p>The screenshot shows a web-based mapping application. The main map displays a street grid in Teddington, with a red dotted area highlighting a specific section. A legend on the left lists various planning zones, including 'Reg 19 Tall and Mid-Rise Building Zones'. Two inset photos show residential streets with 2-3 storey buildings, illustrating the current character of the area.</p>

					<p>The central area of Teddington is already densely populated and in recent times a number of buildings have been built which are out of keeping to the surrounding residential property heights (including the recent Informer house and the longer standing Travel Lodge). No further increases in height should be allowed. Presently these building have lower impact on residential properties as they are somewhat separated. Extension of this 'zone' along Station Rd however would change this situation.</p>  <p>1 Park Rd is also a large dominating building at 4-5 storeys. These larger buildings have already been allowed by planning in this zone and therefore there seems no need to reclassification the area proposed anyway.</p>	
170	Julia & Julian Mancell Smith	Teddington mid-rise zone	No	Justified	<p>I would like to object to the proposal to allow an extended area of 'mid-size'/6 storey buildings in central Teddington. Teddington is a residential area of pleasant character which could change with the proposal. In particular Station Rd could be unreasonably affected by allowing 6 storey development on its west side as shown by the pictures below. Only 2-3 storey development would be in keeping with the residential character of the area in the red dotted area.</p>  <p>The central area of Teddington is already densely populated and in recent times a number of buildings have been built which are out of keeping to the surrounding residential property heights (including the recent Informer house and the longer standing Travel Lodge). No further increases in height should be allowed. Presently these building have lower impact on residential properties as they are somewhat separated. Extension of this 'zone' along Station Rd however would change this situation.</p>	



						 <p>1 Park Rd is also a large dominating building at 4-5 storeys. These larger buildings have already been allowed by planning in this zone and therefore there seems no need to reclassification the area proposed anyway.</p>	
171	Kate Hibbert	Teddington mid-rise zone			<p>I am writing to voice my concerns over Richmond Councils plans for a mid rise zone along the railway line and north of Teddington station up and over the bridge. I live [Teddington road name removed for data protection] opposite the train station and feel that mid rise buildings of 5-6 storeys will have a negative impact on the area. I don't think this will conserve and enhance the town centres character and these high rise buildings will be visible from our home. Whilst I understand affordable housing may be important I don't feel it needs to be of 5-6 storeys. Teddington Business Park is also really important for providing much needed office and industrial space and is a well designed asset to the town. I fully object to this planning proposal on the above grounds.</p>		
172	Stephen Kerigan	Teddington mid-rise zone			<p>I am writing to lodge my objections on the Place Based Strategy for Teddington and Hampton Wick (Section 7), especially with regards to potential "mid rise zone" being proposed along the railway line. I cannot agree to the potential loss of Teddington Business Park, which provides much needed office and industrial space and is a valuable and well designed asset to the town. The businesses and associated employees bring economic benefits to the local shops and these will suffer if this asset is lost, as well as local employment opportunities for residents. Further, a new mid rise zone on the scale proposed would have a detrimental effect on the character of the town.</p>		
173	Rosemary McGlashon, The Teddington Society	Teddington mid-rise zone	No	Justified	<p>Page numbers 47, 48, 262, 263, 413 Section 7, Place-based Strategy for Teddington &amp; Hampton Wick Policy 45, Maps: p26, Appendix 3 Teddington p413. The draft local plan says (p. 47) that "The Council works through the Teddington Society ... to make Teddington a great place to work and live.", yet no account appears to have been taken of our earlier input to the draft plan nor has anyone from the Council discussed our input to the first draft with us. This input is a re-iteration and expansion of our previous comments on a Mid-Rise Zone in Teddington (Section 7: Place-based Strategy for Teddington &amp; Hampton Wick (p.48) [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comments 300]. Page numbers refer to the Publication Local Plan low resolution version. We are very concerned that the area "along the railway line north of Teddington Station" (and we note from Policy 45 and Appendix 3 (p413) that this is on both sides of the railway and over the railway bridge) is being designated a Mid-Rise Zone (5-6 storeys). We believe that (as it is effectively right in the town centre) this is totally inappropriate and there should be no Mid-Rise or Tall-Building Zones in Teddington. We note that Page 26 shows that no other area in the borough has a mid-rise building zone right in the town centre. We consider that designating this 'Mid-Rise Zone' will encourage the building of 5-6 storey buildings in that area as developers may assume that permission would be granted. This would also remove the public's ability to object to development on grounds of scale. The Local Plan says that "the borough is characterised by primarily low to medium rise buildings which has produced very attractive townscapes and is important to the borough's distinctive character." We already have taller buildings in the centre of Teddington, such as the Travelodge, Harlequin House or the new Informer House. They are not part of an 'attractive townscape' and conflict with Teddington's 'distinctive character' and further cut Teddington in half, visually separating one side of the railway from the other. Page 48 (bullet point 3) proposes to "improve the sense of arrival at Teddington Station", yet next to the station could be 5-6 story buildings instead of the low-level business park/industrial land now existing. The scale of the buildings in Station Road, in The Cedars, at Teddington Station and the Park Hotel should be respected and nothing should be built</p>	To protect the character of Teddington and to preserve the low-level Teddington Business Park and land around the station from unsuitable development any reference to a Mid-Rise Zone at Teddington Station should be deleted from the Local Plan - see above for the full justification.	

						<p>that is out of the scale or character of these locations. The current business park reinforces the character of the streets around the station in its scale and mass, which mid-rise buildings would not.</p> <p>The areas near Teddington Station that are now industrial sites should remain as such to enable local employment. We support the designation of Teddington Business Park, Station Road as a Locally Significant Industrial Site (LSIS) (section 19.29, p262) and note that in section 19.34 (p263) the Local Plan says “The Council will protect employment uses within the identified key industrial land location”. It particularly mentions “car repair garages”. Halfords is sited in the Teddington Business Park (along with tens of other local employers). A Mid Rise Zone designation is not necessary to achieve this.</p> <p>The designation of “Mid-Rise Zone” north of the station, with the possible loss of the industrial estate and other industrial land, contradicts other statements in the plan about the importance of industrial and office space. The following sections directly support retention of industrial land, section 4.19 (p23), Section 17.9 (p215), Policy 21 A.1 (p253), Sections 19.1 (p254), 19.2 (p254), 19.6 (p255), 19.35 (p264) and Policy 23 A (p257).</p> <p>In summary, to protect the character of Teddington and to preserve the low-level Teddington Business Park and land around the station from unsuitable development any reference to a Mid-Rise Zone at Teddington Station should be deleted from the Local Plan.</p>	
174	Margaret Ballantyne	Teddington mid-rise zone				<p>First I would like to ask why residents in <b>[Teddington address details removed for data protection]</b> did not receive a copy of the council’s paperwork/ booklet on Teddington Broad Street when we live in TW11 and are a stones throw from the proposals ?</p> <p>I have been a Teddington resident since 1970 I like living in a small town with its parks , river , schools, shops, hospital and transport links . Your proposals will destroy Teddington’s residential village character</p> <p>We are already densely populated: The Travel Lodge-Informer House and other monstrosities built on the hill are an eyesore</p> <p>However did they get passed for planning ?</p> <p>I oppose ANY more high rise buildings They not only spoil the ambiance of the area. They spoil the outlook of householders.</p> <p>The Police Station is going to rack and ruin; what is happening to that ?</p> <p>The traffic congestion in Broad Street is ridiculous. We need wider pavements for safety. Remove the parking spaces and reopen the car park on North Lane. We need a couple of disabled spaces for accessibility</p> <p>Apart from Tesco and a few really lovely and useful shops , Broad Street is predominately charity shops. Parking and pavements would maybe encourage other independent retailers to open new businesses ?</p> <p>Elleray Hall and North Lane are both dangerous cut - throughs. Could a one way system be considered ?</p>	
-	Jenny & Rod Linter	Teddington mid-rise zone	N o	Justified		[See comment 505 in relation to the Teddington Mid-rise Zone]	
175	Roger Hackett, Teddington Residents Association Neighbours of Elleray Hall (TRANEH)	Teddington mid-rise zone				<p>I write on behalf of the Teddington Residents Association Neighbours of Elleray Hall (TRANEH)</p> <p>Below is the Association’s response to the proposals for the revisions to the local plan in Teddington.</p> <p>The Association would like to suggest the proposal to allow an extended area of ‘mid-size’/6 storey buildings in central Teddington should be modified or dropped.</p> <p>Teddington is a residential area of pleasant character which could change with the proposal. In particular Station Rd could be unreasonably affected by allowing 6 storey development on its west side as shown by the pictures below. Only 2-3 storey development would be in keeping with the character of the area in the red dotted area.</p>  <p>The central area of Teddington is already densely populated and in recent times a number of buildings have been built which are out of keeping to the surrounding residential property heights (including the recent Informer house and the longer standing Travel Lodge). No further increases in height should be allowed. Presently these building have lower</p>	

					<p>impact on residential properties as they are somewhat separated. Extension of this 'zone' along Station Rd however would change this situation.</p>  <p>1 Park Rd is also a large dominating building at 4-5 storeys. These larger buildings have already been allowed by planning in this zone and therefore there seems no need to reclassification the area proposed anyway.</p>	
176	Margaret Stapleton	Teddington mid-rise zone			<p>I am writing to express my deep concern over plans for a <b>mid-rise zone</b> along the railway north of Teddington station, up to and over the bridge. A line of buildings at this height would change the character of the town. It would not conserve or enhance it. I am very concerned also that it may involve the loss of Teddington business park, which provides much needed office and industrial space and is a valuable and well-designed asset to the town. I believe that there would be significant impact on the views from the residential streets near the station. I live in <b>[Teddington road name removed for data protection]</b> and I chose to buy a property in Teddington in 2021 because I love the character and feel of the town. It has a lovely neighbourly quality and I do not think that any "mid rise" building will do anything to enhance the aesthetic feel of this lovely part of the borough of Richmond.</p> <p>I am sincerely hoping that local residents' views and opinions will be taken seriously as part of the consultation for the Local Plan.</p>	
177	Paul Paul	Teddington mid-rise zone			<p>This plan has only just come to my attention, which I find amazing when the council has spent a fortune on brochures delivered to everyone's address re new "wall art" on Broad Street. The residents directly impacted by this have had no correspondence from the council.</p> <p>I strongly disapprove of such a new development.</p> <p>The development area behind The Cedars and off Adelaide Rd has obviously been in cahoots for many years as the council has allowed the railway to chop a huge number of trees down - including at least a dozen silver birches. If I ask to lower mine - I get told 3 foot and that is it.</p> <p>This is meant to be a conservation area and additional building squashed into that area will be an eyesore.</p> <p>It will also be a nightmare for people living in the Cedars.</p> <p>Any construction would also result in flats directly looking into our back gardens, kitchens and living rooms removing all privacy. It will also mean we have to endure years of construction work and dust/noise making our houses uninhabitable.</p> <p>Many times I have heard that the railway needs that land to store parts when they do work for the surrounding stations so it was imperative. A new bike-store again was added. This also seems to be the part of the planning dance whereby you add bit by bit until you change it's purpose.</p> <p>If this does go through I certainly will not vote for the Lib-Dem council again.</p> <p>Again I strongly disapprove of such a new development.</p> <p>The council seem to have a wish to squeeze as much into any small space as possible thus changing the whole reason most of us moved to Teddington in the first place. In my case nearly forty years ago.</p>	
-					<b>Site Allocation 6: Telephone Exchange, Teddington</b>	
178	David Wilson, Thames Water	Site Allocation 6 Telephone Exchange, Teddington			<p>Thames Water <b>Site ID 49784</b> (Reviewed Jan18)</p> <p><b>Water Response:</b> On the information available to date we do not envisage concerns regarding water treatment capacity in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email <a href="mailto:Devcon.team@thameswater.co.uk">Devcon.team@thameswater.co.uk</a> tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that</p>	



						<p>the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Additional Comments:</b> With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water and aim for greenfield runoff rates we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.</p>	
-						<b>Site Allocation 7: Teddington Delivery Office, Teddington</b>	
179	David Wilson, Thames Water	Site Allocation 7 Teddington Delivery Office, Teddington				<p>Thames Water <b>Site ID</b> 49785 (Reviewed May 21)</p> <p><b>Water Response:</b> On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Additional Comments:</b> With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water and aim for greenfield runoff rates we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.</p>	
-						<b>Site Allocation 8: Strathmore Centre, Strathmore Road, Teddington, TW11 8UH</b>	
180	David Wilson, Thames Water	Site Allocation 8 Strathmore Centre, Strathmore Road, Teddington, TW11 8UH				<p>Thames Water <b>Site ID</b> 41229 (Reviewed Jan18)</p> <p><b>Water Response:</b> On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Additional Comments:</b> With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water and aim for greenfield runoff rates we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.</p>	
-						<b>Site Allocation 9: Teddington Police Station, Park Road, Teddington</b>	
181	Roger Byatt	Site allocation 9: Teddington Police Station				<p>Site allocation 9: Teddington Police Station</p> <p>I think priority should be given to building as relocation site for the Park Road Surgery</p>	
182	David Wilson, Thames Water	Site Allocation 9 Teddington Police Station, Park Road, Teddington				<p>Thames Water <b>Site ID</b> 75262</p> <p><b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan.</p> <p><b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan.</p> <p><b>Additional Comments:</b> To provide a more detailed response we will require information on the scale of development.</p>	
-						<b>Place-based Strategy for Twickenham, Strawberry Hill &amp; St Margarets</b>	



-	Andrew Miller, Strawberry Hill Residents' Association	St Mary's University future plans					[See comment 192 in relation to Site Allocation 10 St Mary's University]	
183	Graham Martin	Place-based Strategy for Twickenham, Strawberry Hill & St Margarets		No		Positively Prepared	<p>The proposal of a bridge connecting Ham to Orleans Road is simply out of the question on so many levels, including safety for all as a primary concern.</p> <p>Orleans Road is already overused and there have been many incidents with cars, cyclists and pedestrians, including several close calls involving children and buggies. Orleans Road is more a lane than a road, in fact it was originally called Ferry Lane, and as such is very narrow and certainly not suitable as a cycle thoroughfare or indeed an access point from Ham to Twickenham or visa versa. Building a bridge at the end of Orleans Road has so many safety issues for all, from residents to users, and is a bad proposal.</p> <p>The area at the end of Orleans Road cannot have lighting as there are bats. The bats are a protected species. Neither could footings for a bridge be constructed in the river bank, or river, at this point as there is a species of muscle living in this part of the river that is also protected. No lighting would be a severe and high risk safety hazard at night, a bridge without lighting would be a muggers dream and dangerous for any unaware user of the bridge.</p> <p>The proposed site for the bridge would sit in the protected view from Richmond Hill, a view deemed of great historical significance and as such is rightly to be protected.</p> <p>This idea/proposal falls flat on many levels, it simply is a non starter unless the wish is to create problems for the future. A bridge at Radnor Gardens could easily be constructed and would not create issues such as the ones outlined above. A bridge at Radnor could have lighting, does not access a residential street, would not sit in a protected view, have no historical or conservation issues and would be safe for both cyclists and pedestrians, not to mention residents. A bridge at Orleans Road would become a hazard and ruin a conservation area with historical significance. A bridge would also destroy a beautiful stretch of the river enjoyed by residents and visitors alike, it would also cause the closure of the ferry enjoyed by so many.</p> <p>I strongly object to the proposal of a bridge linking Ham to Twickenham being sited at the river end of Orleans Road.</p>	
184	Olivia Russell (CBRE), Rugby Football Union (RFU)	Place-based Strategy for Twickenham, Strawberry Hill & St Margarets	Yes	No	Yes	Justified; Consistent with national policy	<p><b>Design Objectives</b></p> <p>The Urban Design Study 2021 locates the Twickenham Stadium complex within the Twickenham Residential character area, which is primarily characterised by Victorian residential properties located to the south of the stadium beyond Whitton Road and Chertsey Road. To the west is the Whitton and Heathfield Residential area, which is characterised by a suburban character and 1930s semi-detached terraced housing.</p> <p>The Stadium comprises an 82,000 seat stadium, along with associated uses such as banqueting and conference facilities, a ticket office, a retail shop, a museum, a gymnasium and a hotel. The existing Stadium is equivalent to 13-storeys in height.</p> <p>The RFU acknowledges that the C2 Twickenham Residential character area in the Regulation 19 Local Plan notes the Stadium forms a 'distinct sub area'. This is key, as it is clear that the Stadium is in contrast with the surrounding residential setting. It is also acknowledged that Under Sensitivity, the Twickenham Stadium is identified as 'sub area b', with a lower sensitivity and more able to accommodate change.</p> <p>In response to CBRE's Regulation 18 representations, highlighting the contradiction between the 'vision' section of the place-based strategy which states that "Twickenham's important sporting and cultural attractions will be maximised" and the general protectionist stance within area C2, the Council has confirmed that the following wording has been added to the design guidance in the Urban Design Study, which is welcomed:</p> <p><i>"Create a masterplan/vision for the area around Twickenham Stadium (sub area b) to encourage better integration of the stadium alongside opportunity for additional sporting and cultural attractions."</i></p> <p>The RFU will engage with LBRuT at an early stage on any evolving proposals for works to the Stadium and surrounding land. Any proposals would aim to align with Regulation 19 Draft Local Plan Strategic Policy 8 which states that:</p> <p><i>"Twickenham's important sporting and cultural attractions will be maximised and disruption to local residents and businesses minimised"</i>.</p>	
185	Philip Villars, PMV Planning Limited on behalf of owner of Arlington Works	Place-based Strategy for Twickenham, Strawberry Hill & St Margarets		No			<p><b>Our previous comments which still remain relevant</b></p> <p>The concerns and comments we previously raised in the Regulation 18 version of the plan have not been addressed. They are legitimate concerns and undermine the soundness of the emerging Local Plan. For ease, we re-state our concerns below.</p> <p><b>8 Place-based Strategy for Twickenham, Strawberry Hill &amp; St Margarets</b></p> <p>[See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments – comments 190 and 502 in relation to the place-based strategies]</p> <p>The map attached to the area profile is inaccurate as it does not differentiate between St Margarets Local Centre and St Margarets residential.</p> <p>We do not understand or agree with the rationale used to select or discount sites for inclusion within site allocations within the area. The Arlington Works site could support a mixed use (commercial and residential) regeneration scheme on a key site within the area, however it has been discounted. The Local Plan should provide a place based policy document to support development within the area and as such should consider and support the contribution that sites such as Arlington Works can play in regeneration.</p>	

						It is entirely appropriate that the Arlington Works site should be allocated for mixed use development in the Local Plan. As it stands, the plan is unsound. We would like to work with officers to agree how this can be addressed and how consultation with local residents can assist.	
186	Craig Hatton, <b>Network Rail (Southern)</b>	Place based strategy for Twickenham, Strawberry Hill & St Margarets				Network Rail does not believe that this place-based strategy is sound as it fails to accord with the spatial strategy of the Plan and is therefore neither positively prepared nor justified. Network Rail believes that these soundness issues can be overcome with some additions to the wording in the strategy and the site allocations so that these actively promote improved access to the rail network for all users and include reference to capturing developer and third-party contributions to help to fund these improvements.	
187	Luke Burroughs, <b>Transport Trading Limited Properties Limited (TTLP)</b>	Place based strategy for Twickenham, Strawberry Hill & St Margarets				<b>Place-based Strategy for Twickenham, Strawberry Hill &amp; St Margarets</b> We are supportive of the Council's recognition that this area is an appropriate location for growth. TfL has two significant landholdings in this area. [See comments 209 on Site Allocation 15 and 220 on Site Allocation 19]	
-						<b>Site Allocation 10: St Mary's University, Strawberry Hill</b>	
188	Tim Brennan, <b>Historic England</b>	Site Allocation 10 St Mary's University, Strawberry Hill				SA 10 – Strawberry Hill As above, we welcome the greater detail relating to the site's context, including the identification of relevant heritage assets (although we would point out that St Mary's College Chapel is a Grade II listed building, rather than Grade I as set out). Given the range and concentration of heritage assets in and around the site, we would agree with the description on page 66 of the draft Plan that this is a highly sensitive site. The potential effects of new development are therefore significant. As such, and in order to manage these effects properly, we consider that the site allocation policy should include further text to be more precise about the form development will take. Analysis of both the heritage significance of the wider site and the multiple designations across it can help define the extent of the developable area. This can then inform both potential site capacity and design parameters to guide development, thus demonstrating understanding of impacts of development on the historic environment. This should also include views across the site and from the river. We note and welcome the reference to future development enhancing the character of the site, although we would suggest that the text be amended (or further text included elsewhere) to be clear that it should also enhance the heritage significance of the site. As with our previous consultation response we consider that further research on the historic landscape would enable better understanding of the significance of the wider site and potentially enable further enhancements. Further assessment will also help in understanding the potential of existing buildings for reuse rather than demolition and replacement.	
189	John Sadler, <b>CPRE London</b>	Site Allocation 10 St Mary's University, Strawberry Hill		N o	Effective	Site Allocation 10: St Mary's University. We are concerned that the proposals for this site are very likely to involve inappropriate development on Metropolitan Open Land (MOL).	
190	David Wilson, <b>Thames Water</b>	Site Allocation 10 St Mary's University, Strawberry Hill				Thames Water <b>Site ID 41232</b> (Reviewed Jan18) <b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan. <b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan. <b>Additional Comments:</b> To provide a more detailed response we will require information on the scale of development.	
191	Jo Edwards, <b>Sport England</b>	Site Allocation 10 St Mary's University, Strawberry Hill				support reference in vision to retention or replacement of playing fields and sports facilities to equal or better standard	
192	Andrew Miller, <b>Strawberry</b>	Site Allocation 10 St Mary's University, Strawberry				We were very surprised that our comments at the Pre-Publication Consultation stage regarding the Site Allocation 10 for St Mary's University have not resulted in significant changes to the wording. As we then pointed out, the University no longer had major plans for the extension of its footprint on the site, which the University authorities have subsequently reconfirmed to us.	The statements in Site Allocation 10 therefore remain misleading regarding the University's intentions, which cannot be helpful or appropriate for inclusion in the new Local Plan.


	<b>Hill Residents' Association</b>	Hill (future plans)					
193	Lucy Hale (Gerald Eve), <b>St Mary's University</b>	Site Allocation 10 St Mary's University, Strawberry Hill				<p>Response form: The representations submitted do not seek to address whether the Draft local Plan is legally compliant, sound or complies with the duty to co-operate. The proposed amendments and comments seek greater clarity to support the future growth and demand of the University. Please refer to supporting covering letter which sets out further details. [See below and comments 370, 466, and 479 in this schedule]</p> <p>Covering letter: We write on behalf of our client, St Mary's University ('St Mary's'), to make representations on the London Borough of Richmond upon Thames ('LBRuT') Draft Local Plan (Regulation 19) which is out for consultation until 24 July 2023.</p> <p><b>Background to St Mary's</b>          Founded in 1850 by the Catholic Poor Schools Committee, St Mary's University which was formerly a high education college, became a university in 2014. The University's main campus is located in Strawberry Hill, as well as a campus at Teddington Lock, a short walking distance from the main campus, which promotes sports facilities as well as teaching spaces in the existing pavilion building.</p> <p>St Mary's offers a highly rated teacher training programme and range of courses to students, including sport and health degrees. The University is internationally renowned for sport and offers a wide range of sport science degrees including physiology, rehabilitation and physiotherapy, sport psychology, nutrition, coaching science and conditioning.</p> <p>The vision (Vision 2030) of the University is to build around creating a transformational experience for students, and staff as the staff support them to succeed. The five pillars include: achieving student success, developing people, extending impact through growth, expanding reach through partnerships and enhancing sense of place. St Mary's University, Twickenham has climbed 16 places to sit in its highest ever position in The Times and The Sunday Times Good University Guide 2023.</p> <p><b>Draft Site Allocation 10: St Mary's University, Strawberry Hill</b>          St Mary's submitted representations to the Regulation 18 Consultation on 28 January 2022 in respect of Draft Site Allocation 10 which relates to their main campus in Strawberry Hill. They wish to reiterate and expand on these previous comments as part of the Regulation 19 Consultation. [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 506 in relation to the Site Allocation]</p>	<p>Response form: Please refer to supporting covering letter in relation to suggested modifications. We welcome the opportunity to discuss the suggested modifications to the Draft Local Plan with the Council.</p> <p>Covering letter: St Mary's welcome the inclusion of their main campus and the support for future growth in respect of upgrading and enhancing teaching, sport and student accommodation.</p> <p>They would like to highlight that the red line boundary shown on page 65 of the Draft Local Plan is not correct. There is a section of land to the rear of 11 Waldegrave Park which is owned by St Mary's excluded from the red line which is currently leased to Newland House School. Please refer to the appended site ownership plan to this covering letter [See Appendix 3]. The request is for this land to be incorporated into the draft site allocation boundary.</p> <p>In respect of draft Site Allocation 10, St Mary's would like to suggest the following addition to the third bullet point of the draft Site Allocation, in respect of the MOL designation on the main campus:</p> <p><i>"It is acknowledged that this is a constrained site, with the majority of land not built on designated as MOL. Future development should protect and enhance the character and openness of the designated open land, including views and vistas. <b>However, further educational and/or sport facilities proposed within the MOL designation may be considered acceptable, subject to an appropriate very special circumstances case being provided.</b> There are also listed buildings, BTMs proximity to conservation areas and also sports fields. Any development proposal should protect and, where possible, enhance the highly significant heritage assets and respect the special and unique location and setting of St Mary's University, including the Grade I Listed Chapel, adjoining Grade I listed building Strawberry Hill House and the associated Historic Park and Garden (II*) as well as the high quality Edwardian villas within the Waldegrave Park Conservation Area, having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD "[amendments in bold]."</i></p> <p>The draft Site Allocation focuses on the main campus and while there is reference to Teddington Lock campus, this is in relation to a Masterplan and/or site development brief (SPD). St Mary's would like the opportunity for their Teddington Lock campus to be considered for its own site allocation, or further emphasis provided in the current draft site allocation for the University, in recognition of the projected future enhancement of the overall campus.</p> <p>The Teddington Lock campus, acquired in 1999 (approx.15 acres) is located 1.3miles from the Main Campus and benefits from an All Weather Pitch (AWP) and 5 pitches; two football pitches, a training pitch, a rugby pitch and a mini ruby pitch. There are also two cricket pitches. A car park serves the campus, accessed via Broom Road. There is one pavilion to the north west with changing and toilet facilities, a smaller pavilion to the south used a store, and a two storey building to the east of the site which offers changing rooms and facilities at ground floor and teaching rooms and staff/student rooms at first floor. The educational use of the site has been present for over 10 years and is established. For ease of reference, a Site Plan of the Teddington Lock Campus is appended to this letter [See Appendix 3].</p> <p>The Teddington Lock Campus currently suffers from outdated buildings which are no longer fit for purpose to meet the modern needs and expectations of staff and students of the University. Furthermore, the buildings, and the Site itself, suffer from poor accessibility which reduces access for staff and students with mobility difficulties. As a result, the teaching spaces and wider Site are not desirable and have become underused. There is an opportunity to utilise this additional campus and enhance the teaching spaces and sport facilities on offer in support for the current and future demand for University places, for example, for the University's Sport and Exercise programmes. Furthermore, the changing and showering facilities are inadequate and as a result the use of these, by the students, clubs and local community who utilise the outdoor pitches is limited. Furthermore, the outdoors pitches are in need of upgrade and improvement.</p> <p>The vision for this campus is to enhance the indoor and outdoor sport and recreational use and associated ancillary educational facilities through re-development of the site including the redevelopment of existing building, and provision of artificial sports surfaces to improve the facilities offered to students and staff of the University and also to maintain and improve partnerships with the local community.</p> <p>While it would be preferable for the Teddington Lock campus to have its own site allocation, should this not be possible, St Mary's deem it would be beneficial for greater acknowledgement of the opportunity of improvement, upgrade and enhancement of the sport and educational facilities at the Teddington Lock campus through greater clarification in draft</p>

										Site Allocation 10. We would suggest that bullet point number 2 of the draft Site Allocation, is amended to read as follows: <i>“The existing playing fields and sports facilities at the Strawberry Hill campus and Teddington Lock campus should be retained and/or re-provided, to meet modern educational and sports requirements of the University and support future demand, and if necessary, replacement facilities will have to be provided off site. Any re-provision of facilities should be equal or better standard than existing.” [amendments in bold].</i> In addition, we would suggest that the Teddington Lock campus site plan is included alongside the site plan for the main campus, in the Site Allocation for greater clarity. We note the comments submitted on the Regulation 18 Consultation from various parties including the National Trust, Historic England and CPRE on the Draft Site Allocation 10. St Mary’s believe that the Council’s approach taken to the wording included within the Site Allocation in respect of development on the main campus allows for a fair assessment of forthcoming proposals to be considered on a case by case basis. However, we are seeking greater clarity on the Teddington Lock campus, as outlined above.						
-										<b>Site Allocation 11: Richmond upon Thames College, Twickenham</b>						
194	David Wilson, <b>Thames Water</b>	Site Allocation 11 Richmond upon Thames College, Twickenham								Thames Water <b>Site ID 61057</b> (Approved - 25/05/22) <b>Water Response:</b> The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> . <b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ <b>Additional Comments:</b> With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. “The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide ‘working near our assets’ to ensure your workings are in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.						
195	Jo Edwards, <b>Sport England</b>	Site Allocation 11 Richmond upon Thames College, Twickenham								welcome reference in vision to protect and upgrade the playing field including installation of a new 3G playing pitch and multi-use of sports facilities. The PPS action plan and strategy does not identify this site for a 3G however if it is appropriate, there is a significant requirement for additional full sized 3Gs in the borough..						
-										<b>Site Allocation 12: The Stoop (Harlequins Rugby Football Club), Twickenham</b>						
196	John Sadler, <b>CPRE London</b>	Site Allocation 12 The Stoop (Harlequins Rugby Football Club), Twickenham								Site Allocation 12: The Stoop. Any redevelopment should see the path next to the Duke of Northumberland’s Rivers widened and level access provided to make it more accessible.						
197	Richard Carr, <b>Transport for London (TfL)</b>	Site Allocation 12 The Stoop (Harlequins Rugby Football Club), Twickenham								<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Site Allocation 12: The Stoop Twickenham</td> <td>The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.</td> <td>We note the reference to close working with TfL to ensure development does not lead to unacceptable impacts on the local road network.</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Site Allocation 12: The Stoop Twickenham	The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.	We note the reference to close working with TfL to ensure development does not lead to unacceptable impacts on the local road network.
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198	David Wilson, <b>Thames Water</b>	Site Allocation 12 The Stoop (Harlequins Rugby Football Club), Twickenham				<p>Thames Water <b>Site ID 75264</b></p> <p><b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxx to discuss the water infrastructure needs relating to the Local Plan.</p> <p><b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan.</p> <p><b>Additional Comments:</b> To provide a more detailed response we will require information on the scale of development.</p>							
199	Jo Edwards, <b>Sport England</b>	Site Allocation 12 The Stoop (Harlequins Rugby Football Club), Twickenham				<p>should be made clearer in vision that any development proposals should not impact on the stadium area including stand capacity and pitch.</p>							
200	Nikki Nicholson, <b>Surrey County Council</b>	Site Allocation 12 The Stoop (Harlequins Rugby Football Club), Twickenham				<p>Thank you for consulting Surrey County Council (SCC) on the Regulation 19 version of the Richmond Local Plan. This is an officer response, and our comments are set out below in relation to the council's role as the responsible authority for highways and transport, minerals and waste and as Lead Local Flood Authority.</p> <p>[See comments 330, 334, and 527 in relation to highways and transport, minerals and waste planning, and flooding]</p> <p>Lastly, in respect of proposed Site Allocation 12 – The Stoop, Twickenham; SCC would advise that the London Borough of Richmond upon Thames carefully consider the implications of the proposed allocation (and any future development pursuant to that allocation) on the continued operation of the existing Twickenham Depot, Langhorn Drive, Twickenham which is safeguarded as Site 342 for waste management purposes by the West London Waste Plan 2015. In this regard paragraph 187 of the National Planning Policy Framework 2021 and the 'agent of change' principle is also relevant.</p>							
-						<b>Site Allocation 13: Twickenham Stadium, Twickenham</b>							
201	Richard Carr, <b>Transport for London (TfL)</b>	Site Allocation 13 Twickenham Stadium, Twickenham				<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Site Allocation 13: Twickenham Stadium, Twickenham</td> <td>The allocation states that there is a need to retain sufficient parking, particularly for coaches. This should be rephrased to make it clear that although coach parking should be provided, car parking for employees or spectators should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance. The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.</td> <td>We welcome amendments to the wording which removes the word 'sufficient' and refers to London Plan parking standards. However, to ensure consistency with London Plan Policy T6 the wording should be amended to read:  <del>'There is a need to retain</del> Parking provision <del>particularly for coaches, servicing facilities and space for spectators and related services,</del> should be in line with London Plan standards and <del>should include coach parking and servicing facilities.'</del>  We welcome the reference to close working with TfL to ensure development does not lead to unacceptable impacts on the local road network.</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Site Allocation 13: Twickenham Stadium, Twickenham	The allocation states that there is a need to retain sufficient parking, particularly for coaches. This should be rephrased to make it clear that although coach parking should be provided, car parking for employees or spectators should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance. The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.	We welcome amendments to the wording which removes the word 'sufficient' and refers to London Plan parking standards. However, to ensure consistency with London Plan Policy T6 the wording should be amended to read: <del>'There is a need to retain</del> Parking provision <del>particularly for coaches, servicing facilities and space for spectators and related services,</del> should be in line with London Plan standards and <del>should include coach parking and servicing facilities.'</del> We welcome the reference to close working with TfL to ensure development does not lead to unacceptable impacts on the local road network.	
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202	David Wilson, <b>Thames Water</b>	Site Allocation 13 Twickenham Stadium, Twickenham				<p>Thames Water <b>Site ID 75265</b></p> <p><b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxx to discuss the water infrastructure needs relating to the Local Plan.</p> <p><b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require</p>							



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203	Jo Edwards, <b>Sport England</b>	Site Allocation 13 Twickenham Stadium, Twickenham					could be made clearer in vision that any development proposals should not impact on the stadium area including stand capacity and pitch.	
204	Olivia Russell (CBRE), <b>Rugby Football Union (RFU)</b>	Site Allocation 13 Twickenham Stadium, Twickenham	Yes	No	Yes	Justified; Consistent with national policy	<p>On behalf of our client, the Rugby Football Union ('RFU'), CBRE issued representations in response to the London Borough of Richmond upon Thames (LBRuT) 'Pre-Publication' Draft Local Plan (Regulation 18) in January 2022. These representations primarily related to Site Allocation 13 (SA13) (Twickenham Stadium, Twickenham) which covers 12.62 hectares of land in the RFU's ownership.</p> <p>Using the feedback submitted during the 'Pre-Publication' version consultation, a revised Draft Local Plan has been prepared by LBRuT: the 'Publication' Draft Local Plan (Regulation 19). Consultation will take place from 9 June 2023 to 24 July 2023.</p> <p>CBRE has reviewed both the Statement of Consultation (June 2023) (which includes the Council's written response to each comment made during the Regulation 18 consultation), and the Regulation 19 version of the draft Local Plan, to determine where the RFU's previous representations have been addressed, and the need for any further representations and modifications.</p> <p>This letter provides further representations on the Regulation 19 version of the Draft Local Plan, again, primarily relating to Site Allocation SA13. The extent of SA13 is provided as <b>Figure 1</b> below.</p>  <p><b>SITE ALLOCATION</b></p> <p>The RFU strongly support the inclusion of an allocation which reflects the strategic nature of the Twickenham Stadium site, and welcome the suggestion of a working partnership with the Council to develop a Masterplan for the site and its long-term development.</p> <p>The RFU has a long-term vision to improve and enhance Twickenham Stadium, and develop a masterplan to maximise the visitor experience and local economic benefits of this nationally significant venue and world famous landmark.</p> <p><b>Vision – Proposed site, Twickenham Stadium</b></p> <p>Within the Regulation 18 representations, the RFU proposed the main description within the Site Allocation be updated as follows (red text as additions).</p> <p><i>"The Council supports the continued use and improvement of the grounds for sports <b>and entertainment</b> uses. Appropriate additional facilities including new stands, indoor leisure, hotel or business uses, as well as <b>food and beverage, appropriate retail, hospitality and conference facilities, may be supported provided that they are complementary to the main use of the site as a sports <b>and entertainment venue ground</b></b></i>".</p> <p>The Council's Statement of Consultation (June 2023) states that the primary sporting function of the Stadium and site must be protected and there is a risk that inclusion of 'entertainment' as an acceptable primary land use within the Site Allocation could dilute this protection, as it could not be guaranteed that sporting events would outnumber concerts/entertainment events, which would render the Stadium an entertainment venue and not a sporting stadium. As such, the specific reference to entertainment has not been added within the Regulation 19 Draft Local Plan, however the blue text below has been added, as follows:</p> <p><i>"The Council supports the continued use and improvement of the grounds for sport uses. Appropriate additional facilities including new stands, indoor leisure, hotel or business uses, as well as hospitality, conference facilities, <b>food and beverage and associated retail, may be supported provided that they are complementary to the main use of the site as a sports ground</b></i>".</p> <p>Whilst the main text has not been updated to include a reference to entertainment uses, the Site Allocation supporting text has been revised to reference the Council's recognition of the important revenue-generating role that</p>	<p>According to the conclusions of the MOL Annex Report 2021 p.115-117 (Local Plan Evidence Base document), the eastern edge of Parcel 36 does not meet the MOL criteria.</p> <p>We therefore propose the following modifications.</p> <p>Current wording within Site Allocation 13 (p. 75-78): "Part of the site, adjacent to the Duke of Northumberland River, is designated Metropolitan Open Land (MOL). The Open Land Review 2021 found that the MOL strip of land to the east of the river should be improved as it forms part of the valued green corridor at the Duke of Northumberland's River to enhance provision for wildlife and access. Therefore, any development proposal is required to protect and, where possible, enhance, the Duke of Northumberland River, including access to it, and the associated MOL."</p> <p>Proposed wording within Site Allocation 13 (p.75-78): "The Open Land Review 2021 found that the strip of land to the east of the Duke of Northumberland River should be improved as it forms part of the valued green corridor to enhance provision for wildlife and access. Therefore, any development proposal is required to protect and, where possible, enhance, the Duke of Northumberland River, including access to it.</p> <p>The Open Land Review 2021 (MOL Annex Report 2021) also found that the hard standing associated with Twickenham Stadium meets none of the MOL criteria, and therefore this land has been removed from the designation. Notwithstanding, any development proposals for Twickenham Stadium would be required to meet Policy 35, and take into account possible impacts on the character, local distinctiveness and openness of the adjacent MOL".</p>

						<p>entertainment uses on site have for the viability of the sporting Stadium. The following has been added to the supporting text.</p> <p><i>“The Council recognises the important revenue-generating role that continued entertainment uses on site have for the viability of the sporting stadium. An entertainment use on site will be supported where it is secondary to the primary sporting function and where it has been demonstrated that there would be no unacceptable impact on the local road network and amenities of Twickenham residents.”</i></p> <p>Whilst this is welcomed, we remain of the view that some reference to entertainment uses should also be included in the Site Allocation’s main description. This supporting use is commercially important to the RFU, and enables the Stadium to continue its primary function as a sports venue, and it is considered that this important function should be recognized within the site allocation, whilst acknowledging the primary sporting use.</p> <p>At present, the Council have indicated that entertainment uses on site can take place up to 29 days within and per single calendar year, under permitted development. The number of additional concerts/entertainment events is controlled by the planning process and through conditions attached to previous planning permissions. In the recent past, the number of concerts has represented less than 10% of the major events that have taken place at the Stadium, therefore any concert use is clearly a secondary use to the primary use as a sporting venue. Any further potential increased use of the Stadium for concerts would be controlled by the Council through the planning and licensing processes. Therefore, we consider that adding the following text would not prejudice the primary sporting use of Twickenham Stadium, or render the Stadium an entertainment venue rather than a sporting venue, and suggest the main description of the site allocation is updated accordingly. Using a dictionary definition, it is also considered that Twickenham Stadium should be referred to a ‘sports venue’ rather than a ‘sports ground’, as sports ground does not adequately define a modern, internationally significant sports venue.</p> <p><i>The Council supports the continued use and improvement of the <b>venue grounds</b> for sports uses, along with <b>entertainment uses as a secondary/supporting land use</b>. Appropriate additional facilities including new stands, indoor leisure, hotel or business uses, as well as food and beverage, appropriate retail, hospitality and conference facilities, may be supported provided that they are complementary to the main use of the site as a sports <b>venue ground</b>”.</i></p> <p>With regard to introducing other land uses on the site, the Council’s Statement of Consultation (June 2023) notes that whilst the site currently has a Sui Generis land use, it is expected to have an existing employment-generating use. The RFU currently employs over 300 staff on full time contracts, in addition to circa. 6,000 part-time staff on matchdays. Third party analysis has also projected that Stadium activity supports a further circa. 1,270 FTE jobs in LBRuT and the London Borough of Hounslow. This would accord with the emerging Site Allocation, and to help meet the overarching vision set out in Strategic Policy 8 for Twickenham to have a strong local economy by rejuvenating its business and cultural offer.</p> <p>The Site Allocation makes clear that a residential use would be considered, subject to sporting, then employment uses, first being investigated, and within the Council’s Statement of Consultation (June 2023), it is confirmed that policy does not preclude a residential use coming forward on the site. This flexibility is welcomed, should new housing be proposed in the future.</p> <p><b>Summary</b></p> <p>The RFU support the prospect of working in partnership with the Council to develop a Masterplan for the Twickenham Stadium site and its long-term development. To this end, these representations provide comments and suggestions with respect to the current drafting of the allocation and relevant other emerging policies.</p> <p>This detailed letter has been provided to response to Part C of the Detailed Response Form. It covers the following draft policies/strategies: Policy 1; Policy 18; Policy 26; Place Based Strategy 8; and, Site Allocation 13. [See other comments 59, 184, 393, 417 and 464]</p> <p>We look forward to further engaging with LBRuT through the plan-making process and through development of a masterplan in response to the Site Allocation. If you have any questions, please don’t hesitate to contact me.</p>	
-						<b>Site Allocation 14: Mereway Day Centre, Mereway Road, Twickenham</b>	
205	David Wilson, <b>Thames Water</b>	Site Allocation 14 Mereway Day Centre, Mereway Road, Twickenham				<p>Thames Water <b>Site ID</b> 75266</p> <p><b>Water Response:</b> On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Additional Comments:</b> Management of surface water from new developments should follow policy 5.13 of the London Plan. Typically, greenfield run off rates of 5l/s/ha should be aimed for using the drainage hierarchy. The hierarchy lists the preference for surface water disposal as follows; Store Rainwater for later use &gt; Use infiltration techniques, such as porous surfaces in non-clay areas &gt; Attenuate rainwater in ponds or open water features for gradual release &gt;</p>	

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206	Richard Carr, <b>Transport for London (TfL)</b>	Site Allocation 15 Station Yard, Twickenham				<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Site Allocation 15: Station Yard, Twickenham</td> <td>We welcome the reference to bus stands. However, the requirement that bus stands should be retained, redeveloped or re-sited in a suitable location needs to be clarified. If bus stands are redeveloped or re-provided this should only be with the agreement of TfL and standing capacity (as well as drivers' facilities) must be maintained and enhanced.</td> <td>In relation to the retention of the bus stands we welcome the addition of references to adequate standing capacity and drivers' facilities.</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Site Allocation 15: Station Yard, Twickenham	We welcome the reference to bus stands. However, the requirement that bus stands should be retained, redeveloped or re-sited in a suitable location needs to be clarified. If bus stands are redeveloped or re-provided this should only be with the agreement of TfL and standing capacity (as well as drivers' facilities) must be maintained and enhanced.	In relation to the retention of the bus stands we welcome the addition of references to adequate standing capacity and drivers' facilities.	
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208	Craig Hatton, <b>Network Rail (Southern)</b>	Site Allocation 15 Station Yard, Twickenham				Network Rail supports the allocation of this land and opportunities to maximise density should be sought due to the sustainable nature of the site. Network Rail supports the desire to improve access to Twickenham station with improved pedestrian and cycle routes.							
209	Luke Burroughs, <b>Transport Trading Limited Properties Limited (TTLP)</b>	Site Allocation 15 Station Yard, Twickenham				<b>Site allocation 15: Station Yard</b> It is welcome that this site allocation includes the TfL landholding. This land has ongoing operational requirements as a bus stand on days when there are events at Twickenham Stadium. However, as recognised in the allocation, should a suitable replacement location be found for this bus stand it will enable development to come forward on this site.							
-						<b>Site Allocation 16: Twickenham Telephone Exchange</b>							
210	David Wilson, <b>Thames Water</b>	Site Allocation 16 Twickenham Telephone Exchange				<p>Thames Water <b>Site ID 71999</b></p> <p><b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan.</p> <p><b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan.</p> <p><b>Additional Comments:</b> The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings</p>							

						are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.							
-						<b>Site Allocation 17: Twickenham Riverside and Water Lane/King Street</b>							
211	David Wilson, Thames Water	Site Allocation 17 Twickenham Riverside and Water Lane/King Street				Thames Water <b>Site ID</b> 65539 <b>Water Response:</b> On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ <b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ							
212	Richard Carr, Transport for London (TfL)	Site Allocation 17 Twickenham Riverside and Water Lane/King Street				<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Site Allocation 18 [now Site Allocation 17]: Twickenham Riverside and Water Lane/ King Street</td> <td>We welcome the suggestion that <i>'There should be a comprehensive approach to servicing and delivery, along with exploring the opportunity to improve the environment of the Embankment through a reduction in car parking.'</i> This could be more directly worded to state that any redevelopment would be expected to remove car parking on the Embankment.</td> <td>We welcome the clarification that 'Given the high PTAL, a reduction in car parking is sought to improve the environment of the Embankment.'</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Site Allocation 18 [now Site Allocation 17]: Twickenham Riverside and Water Lane/ King Street	We welcome the suggestion that <i>'There should be a comprehensive approach to servicing and delivery, along with exploring the opportunity to improve the environment of the Embankment through a reduction in car parking.'</i> This could be more directly worded to state that any redevelopment would be expected to remove car parking on the Embankment.	We welcome the clarification that 'Given the high PTAL, a reduction in car parking is sought to improve the environment of the Embankment.'	
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213	Rachel Holmes, Environment Agency	Site Allocation 17 Twickenham Riverside and Water Lane/King Street				<b>Site allocation 18 [now Site Allocation 17] – Twickenham Riverside and Water Lane/King Street</b> We welcome that the site allocation has removed the term 'where viable' in relation to the flood defence improvement works.							
-						<b>Site Allocation 18: Homebase, Twickenham Road, Hanworth</b>							
214	David Wilson, Thames Water	Site Allocation 18 Homebase, Twickenham Road, Hanworth				Thames Water <b>Site ID</b> 75272 <b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan. <b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan. <b>Additional Comments:</b> To provide a more detailed response we will require information on the scale of development.							
215	Zamir & Violetta Gobra	Site Allocation 18 Homebase, Twickenham Road, Hanworth				We write in response to your Notice of Publication Consultation. We understand that the Allocation of the Homebase site is not a planning application. Our house at the address above is immediately adjacent on the flank to the consultation property, with the result that a future development could connect to our house. However, we propose a different solution which would permit us to build a garage connected to our house which would also be connected from the Homebase side. This would not only produce a useful building, but would also save land by avoiding a set back between the existing houses and the uses to be proposed.							



						Our present request is that Planning Consultation should establish our interest in this project and provide us with information when a development is proposed. Ours is the only house in the planning unit that flanks the Allocation 18 site. Three other properties on the north side are adjacent, but the houses are distant from Allocation site 18 by the length of their back gardens. In the interim, we do not oppose the Allocation and we look forward to participating in the design and development process.							
-						<b>Site Allocation 19: Fulwell Bus Garage, Wellington Road, Twickenham</b>							
216	Richard Carr, <b>Transport for London (TfL)</b>	Site Allocation 19 Fulwell Bus Garage, Wellington Road, Twickenham				<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Site Allocation 19: Fulwell Bus Garage, Wellington Road, Twickenham</td> <td>N/A</td> <td>We note the new site allocation for Fulwell Bus Garage and support the requirement to retain the bus garage use on the site.</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Site Allocation 19: Fulwell Bus Garage, Wellington Road, Twickenham	N/A	We note the new site allocation for Fulwell Bus Garage and support the requirement to retain the bus garage use on the site.	
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Site Allocation 19: Fulwell Bus Garage, Wellington Road, Twickenham	N/A	We note the new site allocation for Fulwell Bus Garage and support the requirement to retain the bus garage use on the site.											
217	David Wilson, <b>Thames Water</b>	Site Allocation 19 Fulwell Bus Garage, Wellington Road, Twickenham				<p>Thames Water <b>Site ID 75273</b></p> <p><b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority’s aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan.</p> <p><b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority’s aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan.</p> <p><b>Additional Comments:</b> To provide a more detailed response we will require information on the scale of development.</p>							
218	Craig Hatton, <b>Network Rail (Southern)</b>	Site Allocation 19 Fulwell Bus Garage				<p>Network Rail supports the allocation of this site and the recognition of the opportunities that come with any re-development in improving access to Fulwell rail station. Fulwell station is one of the few stations in Richmond that has limited access for users. It does not support step free access and has not been given funding for Access for All footbridge and lifts to be installed. Network Rail are supportive of attempts to secure improvements to this station and re-development adjacent and in close proximity to the site would assist in providing for these improvements. In its current form, this site allocation does not support Policy 1 as part of the Local Plan strategy as it fails to identify opportunities around improving access for all users and is therefore unsound.</p>	To make this sound, specific reference should be made to ‘seeking developer and other third-party contributions towards improving identified factors that limit access to the station’. Network Rail recognises the need to retain the bus garage so that the operational requirements can be met. However, the site does lend itself to residential-led development given its proximity to public transport facilities. Given the proximity of the bus garage to the rail station, this operates as a defacto public interchange and the opportunities to encourage users to switch public transport modes is significant. As well as noting the potential for improved access at the station in the allocation, as specified above, Network Rail suggests that reference to this is also made in the Infrastructure Delivery Plan (IDP). The site allocations in the Plan should show a clear connection to the most-up-date evidence such as the IDP, to ensure that these are compliant with national policy.						
219	Duncan McKane, <b>London Borough of Hounslow</b>	Site Allocation 19 Fulwell Bus Garage, Wellington Road, Twickenham				<p>LBH also note the proposed Site Allocation 19: Fulwell Bus Garage, which would involve retention and safeguarding of the bus garage operation, unless it is demonstrated that this is operationally no longer needed or that enhanced provision has been made elsewhere in a convenient and accessible alternative location (as per supporting text to emerging Policy 47 at paragraph 23.21). Should this site come forward, LBH would urge LBRuT to work with TfL and bus operators to ensure there is no interruption to the operation of the bus garage so as to ensure there are no resulting cross-boundary impacts to public transport provision. [See also comment 552 in regards to transport and highway impacts]</p>							
220	Luke Burroughs, <b>Transport Trading Limited Properties Limited (TTLP)</b>	Site Allocation 19 Fulwell Bus Garage, Wellington Road, Twickenham				<p><b>Site Allocation 19: Fulwell Bus Garage and Lidl</b></p> <p>We recognize the requirement to retain the bus garage use on this site and any future development will ensure that appropriate facilities are provided to enable future operational requirements to be met.</p> <p>The allocation currently states <b>“Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with policy compliant levels of affordable housing and on-site car parking be considered as a potential redevelopment option.”</b> The allocation later recognizes that <b>“this site is suitable for a substantial provision of new housing units, including a policy compliant level of affordable housing”</b>. We agree that the site is suitable for a substantial residential led development which includes appropriate supporting retail and employment uses. The allocation should clarify that it is expected the development of this site will be residential led. This would be in line with bullet point 4 of the allocation which identifies that <b>“this site is suitable for a substantial provision of new housing units, including a policy compliant level of affordable housing”</b></p> <p>Any development on the site will provide car parking in line with standards set out in Policy T6 (Car Parking) of the London Plan.</p>							



						<p>The allocation identifies that <b>“there is opportunity to open up the site at the south to improve pedestrian and cycling routes to Fulwell Station. Any proposals for placemaking at this part of the site would need to be designed in a way appropriate to the wider context; including protecting the openness and character of designated open land, and the low-rise urban grain of houses on Wellington Gardens, and protecting the amenities of these occupiers.”</b> To enhance access to the station, it is recommended that numbers 10-15 Wellington Gardens are included within this site allocation. Please see the map in appendix 1 to show these units [See Appendix 4]. The inclusion of these units would ensure high quality public realm could be provided adjacent to the station which would facilitate improved access and placemaking in the area, meeting key objectives of the site allocation.</p> <p>The allocation also recognizes that <b>“Development, including heights, design and massing, should have regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance.”</b> In regard to the Fulwell area, the Urban Design Study and Village Planning Guidance document (2023) states that development should <b>“respect the scale and proportions of residential buildings, while recognizing opportunities for landmark taller elements with a design elegance along main roads and at key junctions”</b> and <b>“Create new distinctive landmarks with a design integrity which improve legibility and break monotony of area. Surrounding public realm should be proportionately sized so the height does not overwhelm the human scale”</b></p> <p>The text set out in the Urban Design Study is welcome and as the site is located at a major public transport interchange in the borough, it is suitable for optimized development in the form of landmark taller buildings in line with the guidance in this document and London Plan policies H1 (Increasing Housing Supply) and D1 (London’s Form, Character and Capacity for Growth). The allocation should state <b>“Development on this site has the opportunity to create new distinctive landmarks in Fulwell while providing excellent new public realm which creates higher levels of accessibility to Fulwell station”</b>. The wording within the Urban Design Study and Village Planning document (2023) should be recognized within the site allocation.</p>		
-						<b>Place-based Strategy for Whitton &amp; Heathfield</b>		
221	Emma Penson (DWD), <b>Dukes Education Group and Radnor House School</b>	Place-based Strategy for Whitton & Heathfield	No	N o	N o	Positively Prepared; Justified; Effective; Consistent with national policy	<p><a href="#">Place-based Strategy for Whitton &amp; Heathfield</a></p> <p>The place based strategy for Whitton refers to Kneller Hall, mentioning the opportunity for a new public park. For the same reasons as those set out in the previous section of this letter we do not consider that this aspiration is deliverable, effective or justified and the wording should be updated to better reflect our client’s proposals for the Site. [See comment 226 on Site Allocation 21]</p>	
222	Nick Dexter, <b>Whitton Community Association</b>	Place-based Strategy for Whitton & Heathfield		N o		Effective	<p><u>“Minor Corrections”</u></p> <p>On page 100, the last paragraph, WCC is referred to as a “day centre”. This should be corrected to “community centre, food bank and pharmacy”.</p>	On page 100, in the last sentence beginning, "At Whitton Community Centre . . ." amend the phrase "(the existing day centre and pharmacy)" to read "(the existing community centre, food bank, and pharmacy)"
-							<b>Site Allocation 20: Telephone Exchange, Ashdale Close, Whitton</b>	
223	David Wilson, <b>Thames Water</b>	Site Allocation 20 Telephone Exchange, Ashdale Close, Whitton					<p>Thames Water <b>Site ID</b> 54327</p> <p><b>Water Response:</b> On the information available to date we do not envisage concerns regarding water treatment capacity in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Additional Comments:</b> With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water and aim for greenfield runoff rates we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.</p>	
-							<b>Site Allocation 21: Kneller Hall, Whitton</b>	
224	David Wilson, <b>Thames Water</b>	Site Allocation 21 Kneller Hall, Royal Military School Of Music, Kneller Road, Twickenham,					<p>Thames Water <b>Site ID</b> 54328 (Pending)</p> <p><b>Water Response:</b> On the information available to date we do not envisage concerns regarding water treatment capacity in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the</p>	

		TW2 7DU (Pending)					<p>developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Additional Comments:</b> With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water. As this site is largely greenfield, any development must aim for greenfield runoff rates. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.</p> <p>Due to the recommendations within the proposed Local Plan including enhancement of habitats and the Metropolitan Open Land, we would encourage any development to utilise green SuDS solutions such as tree pits or wet ponds, as well as permeable pavements where possible.</p>	
225	Jo Edwards, Sport England	Site Allocation 21 Kneller Hall, Whitton					<p>support reference to retaining and where possible upgrading of playing fields including provision of ancillary facilities such as changing to support their use.</p>	
226	Emma Penson (DWD), Dukes Education Group and Radnor House School	Site Allocation 21 Kneller Hall, Whitton	No	N	N	Positively Prepared; Justified; Effective; Consistent with national policy	<p>DWD has been instructed to submit representations on behalf of Dukes Education Group and Radnor House School Limited on the London Borough of Richmond upon Thames (LBRuT) Draft Local Plan Publication Regulation 19 Consultation.</p> <p>The submission comprises of this letter and a completed 'Response Form'. It focuses on our client's interest in Kneller Hall, Kneller Road (the Site) and draft 'Site Allocation 21: Kneller Hall, Whitton'.</p> <p>This letter sets out:</p> <ul style="list-style-type: none"> <li>• The ownership of the Kneller Hall site;</li> <li>• Background to Dukes Education Group and the proposed Kneller Hall School;</li> <li>• The site owner's proposals for Kneller Hall;</li> <li>• A response to the draft Site Allocation 21 and the place based strategy for Whitton, in the context of our client's proposals for the site; and</li> <li>• A response to the proposed Site of Importance for Nature Conservation Designation.</li> </ul> <p><a href="#">Kneller Hall's Ownership</a></p> <p>The site was formerly a Royal Military School of Music, which included residential accommodation and was owned by the Ministry of Defence (MOD). They vacated the site in Summer 2021. The freehold interest of the entire site, totalling 9.7 hectares, was acquired by Radnor House School Limited, which is part of the Dukes Education Group, from the MOD in quarter 3 of 2021.</p> <p>Site surveys and investigations and design development took place alongside pre- application engagement with the LBRuT and Sports England and public consultation from late 2021 to September 2022. A planning performance agreement was also been entered into with LBRuT.</p> <p>A full planning application and listed building consent was then submitted to the LBRuT and is under consideration in connection with our client's proposals to convert the site to a day school (ref 22/3004/FUL and 22/3005/LBC). A further listed building consent application is also under consideration for external repair and cleaning works to Kneller Hall and the two curtilage listed buildings (ref 23/0639/LBC).</p> <p><a href="#">Dukes Education Group</a></p> <p>Dukes Education is a family of UK nurseries, schools and colleges united by a common purpose; to give children the foundations for an extraordinary life through education. Founded in 2015 by its chairman Aatif Hassan, Dukes Education has 23 schools and colleges, and 20 nurseries, with sites across London, Cambridge, Kent, and Cardiff. Dukes Education also owns and runs wraparound advisory services and summer schools at each stage of the education journey, from academic summer schools to university application consultancy services. Dukes is a dynamic, future-focused organisation committed to providing a gold standard of education for young people in the UK. Dukes have significant experience operating schools in listed buildings and restoring listed buildings. In recent years, Dukes Education converted a Grade II listed office building in the London Borough of Hackney to a primary school, for The Lyceum School. In the City of Westminster, a Grade I listed building at 106 Piccadilly was converted to facilitate occupation by Eaton Square School. Eaton Square School also occupy a number of other listed properties within the City of Westminster. The existing Radnor House School, at Pope's Villa, Cross Deep falls within the Grade II listed Pope's Garden parks and gardens designation.</p> <p>Radnor House is part of the Dukes Education Group. Radnor House is an independent selective co-educational day school, currently located at Pope's Villa, Cross Deep, Twickenham, London, TW1 4QG. Radnor House pupils learn in small classes with a strong focus on individual attention. The school educates girls and boys from ages 9 (Year 5) to 18 (sixth form), with three main entry points in Year 5, Year 7 and Year 12.</p> <p>The existing school is approximately a 1.6 mile walk south-east of Kneller Hall. The school wishes to expand, to enable it to improve the facilities that it provides to existing students and also to further grow the school. Dukes Educations has been searching for a suitable additional property in the local area for a number of years.</p> <p>It is proposed that all pupils in Years 7 to 11 and in the sixth form, who are currently located at Pope's Villa, will be relocated to Kneller Hall. Pope's Villa will then solely be used for Year 5 and 6 pupils (junior school).</p> <p>The new school at the Kneller Hall site will be called Kneller Hall school.</p> <p><a href="#">Kneller Hall School</a></p>	

The new Site will provide improved and larger learning spaces for all pupils and to broaden their learning curriculum, to enhance the school's education offering and the facilities that pupils can benefit from. It will enable the facilities at the Site to be bespoke for the age groups located at the Site.

The Site will be self-contained, providing all the facilities that pupils require and therefore pupils and staff will not need to move between the existing and proposed Site. Pupils at the Pope's Villa Site, will travel on minibuses to Kneller Hall to access the proposed sports facilities.

Approximately 100 of the circa 120 staff members at Radnor House currently employed to support the existing Year 7 to 11 and sixth form will move across to Kneller Hall. Further staff will be employed at Kneller Hall as pupil numbers increase. Once the school reaches 1,000 pupils it is expected that there will be a total of 160- 170 staff employed at the school. This results in a net addition of up to 70 jobs at the Site. Further new jobs will also be created at the Pope's Villa Site, resulting in a total of circa 85 additional jobs across the two Sites.

A high quality and well equipped sports facility is proposed to be delivered. This will provide a multipurpose indoor sports hall, indoor swimming pool and changing facilities. This is proposed to be positioned on the western part of the Site.

Sports pitches will be provided on the eastern part of the Site and the existing tennis courts will be retained. Changing facilities to support the outdoor sports facilities will also be provided on this part of the Site. The extensive open space at the Site, and the proximity to Twickenham Stadium means provides an excellent opportunity to deliver high quality sports facilities. These will be used by the school at the Site and also by the Year 5 and 6 pupils based at the Radnor House junior school (at Pope's Villa). Dukes Education will also facilitate managed access to the outdoor and indoor sports facilities for local community groups and other local schools.

An existing building on the northern part of the Site will be refurbished to provide a base for the Forest School learning programme. This facility at Kneller Hall will support the learning of pupils at the Site, pupils from Radnor House junior school and it is proposed that other local schools could also be provided with access to the Forest School facilities.

Dukes want to ensure that the Site's historical musical legacy is retained. They will continue to use the existing outside bandstand and are also proposing to build a performing arts and music hall. This provides an opportunity for music-based events and concerts to continue to be held at the Site, including events that the public can be invited to.

The new facilities at the Site, provide the opportunity for collaboration between Kneller Hall School and other local schools and community groups and the sharing of facilities.

[Proposals for Kneller Hall](#)

The planning and listed building consent applications currently under consideration seek approval for:

*"The demolition of existing modern buildings on the site and the conversion of and extensions to Kneller Hall and other ancillary buildings associated with the former royal military music school to a day school (Use Class F1), together with the construction of associated new purpose-built buildings including teaching space, indoor sports facilities, sporting pavilion and forest school building. Alterations to the existing playing fields, to include an all weather pitch with fencing, flood lighting to existing tennis courts, sustainability measures and re-turfing. Provision of a new access from Whitton Dene, and other ancillary works including parking areas, hard and soft landscaping, lighting, access alterations and energy centre. Internal and external alterations to Kneller Hall and the curtilage listed buildings to facilitate the day school use, including demolition and rebuilding of single storey extension to the west wing of Kneller Hall, extension to the Band Practice Hall and re-opening of Whitton Dene site entrance."*

The Proposed Development comprises of the following core elements:

- Use of the main Grade II listed Kneller Hall for Education Use (Use Class F1);
- Use of Guard Room and Band Practice Hall for Education Use (Class F1);
- Restoration, repair, cleaning and maintenance works to Kneller Hall, the Guard Room and Band Practice Hall. The investment by Dukes Education into these buildings will facilitate the school use and also support the long term retention and protection of the heritage assets.
- Demolition of existing modern buildings and piecemeal development on the Site and the conversion of other existing single storey modern buildings to use as an energy centre and for maintenance storage, ancillary to the main school use (Use Class F1);
- New build development to provide new purpose-built buildings for school use including, teaching space and classrooms, an indoor sports facility with a swimming pool and sporting pavilion (Use Class F1);
- Upgrading and enhancing the existing playing fields and outside sports pitches at the Site and introducing an all weather hockey pitch;
- Ancillary works to facilitate the use of the Site as a school to include high quality sports facilities and a Forest School programme; and
- Facilitation of managed local school and local community group access to the facilities, including the sports and forest school facilities.
- Retention of the outside bandstand.
- Creation of a biodiversity corridor at the north of the site.

The new facilities at the site, provide the opportunity for collaboration between schools and community groups and the sharing of facilities. Prior to the submission of the planning application engagement took place with LBR, Sports England, the local community, local schools and local community groups that could benefit from this access. There was a lot of interest in the use of the facilities.

						<p>Significant financial investment is proposed by our client to ensure the long term retention and preservation of the Grade II listed Kneller Hall and the curtilage listed Guard Room and Band Practice Hall.</p> <p><a href="#">Representations to Draft Local Plan</a></p> <p>This section responds to question 6 and 7 of the LBR's Response Form.</p> <p><a href="#">Site Allocation 21: Kneller Hall, Whitton</a></p> <p>It is welcomed that allocation has been updated since the Regulation 18 wording to acknowledge that our client, the site owner, intends to use the Site for education use. Given the advanced stage of the planning application, we consider that the wording should be further updated to reflect our client's proposals for the Site. Our client is committed to the delivery of the school at the Site, and their intention is to implement the planning permission and listed building consent as soon as permission is secured.</p> <p>The allocation states <i>"The Council will expect .... the provision of high quality public open spaces and public realm, including a new publicly accessible green and open space available to both existing and new communities, together with links through the site to integrate the development into the surrounding area"</i>.</p> <p>The site is not currently publicly accessible and nor was it whilst the MOD occupied the site for the Military School of Music. Providing public open space and links through the site conflicts with the proposed school use, which must prioritise pupil safety and manage access.</p> <p>As part of the planning application our client is committing to a wide range of community access opportunities at the Site. Our client will provide managed access to the outside sports facilities including the playing fields, as well as access to the indoor sports facilities. Local school and community groups will also be able to utilise the Forest School programme and members of the community will be invited to concerts run by the school. The Draft Community Use Agreement that forms part of the full planning application should be reviewed, as this further details the community benefits of the development proposals. This document has been prepared with input from LBRuT and Sports England to ensure a strong package of community use opportunities are provided, and officers and Sports England are now supportive of the latest version of this draft Agreement.</p> <p>Therefore, whilst our client is open to providing managed access to certain parts of the site, it is not feasible or appropriate for open access or links through the Site to be provided. The proposals for the site will result in it becoming more accessible to local community groups and schools, than the site currently is. However, to provide designated publicly accessible green and open spaces, or links through the Site, is not deliverable, effective or justified.</p> <p>The Landscape Design and Access Statement, prepared by ADP that was submitted as part of the full planning application should be reviewed, as this further explains the rationale why links through the Site cannot be provided. The wording in the draft site allocation should be updated to remove reference to publicly accessible green and open space and links through the site, to ensure that the plan is deliverable, effective and justified and to reflect the owner's proposals to deliver a school at the Site.</p> <p>The allocation states <i>"Future development would be expected to demonstrate how the vision set out in the Kneller Hall Masterplan SPD 2020, and requirements above, are being met"</i>. It is noted that a Supplementary Planning Document (SPD) is not part of the development plan. Whilst public consultation was undertaken as part of the SPD's preparation, it was not subject to an independent examination and therefore does not hold the same weight in planning decisions as a Local Plan. The allocation wording should also acknowledge that the masterplan included in the SPD, provides one potential option for the site, but as a result of the current landowner's intentions and the constraints of the site, the masterplan needs to evolve from the version included in the SPD.</p> <p>[See also comment 221 in relation to the Place-based Strategy for Whitton &amp; Heathfield, comment 568 in relation to Appendix 4 Sites of Importance for Nature Conservation, and comment 489 in relation to Policy 39 and biodiversity net gain]</p> <p><a href="#">Summary</a></p> <p>It is welcomed that Site Allocation 21 now acknowledges our client's proposed use of the Site. However, we consider that the wording of Site Allocation 21, as well as the wording for the placebased Strategy for Whitton &amp; Heathfield, should be amended to ensure that the allocation is effective, deliverable and justified.</p> <p>We consider that further consideration should be given to the suitability and extent of the SINC designation at the Site, to ensure that it does not preclude the retention and enhancement of the playing fields.</p> <p>Our client intends to continue to work collaboratively with the Council's planning department to ensure that planning permission and listed building consent is secured, to enable our client to implement their proposals at the Site and ensure the long term protection and maintenance of Kneller Hall.</p> <p>If you require any further information in connection with these representations and the proposals for the site, please do not hesitate to contact me.</p>	
-						<b>Site Allocation 22: Whitton Community Centre, Percy Road, Whitton</b>	
227	Joan Gibson	Site Allocation 22 Whitton Community Centre, Percy Road, Whitton				Page 111 of the local plan is about Whitton Community Centre TW2 6JL. The Heritage Assesst section has abviously been cut and pasted from a section about something in Kew - Whitton TW2 6JL is not local to Kew Gardens station or shopping centre.	

						<p><b>Flood Risk</b></p> <ul style="list-style-type: none"> <li>- Flood Zone 1</li> <li>- Area Susceptible to Groundwater Flooding (1-15% risk)</li> </ul> <p><b>Views</b></p> <p>None</p> <p><b>Heritage Assets</b></p> <ul style="list-style-type: none"> <li>- Remnant to site</li> <li>- Backing of Townscape Heritage Area of St Augustine of Canterbury Hospital Bridge Road (20m south of site)</li> </ul> <p><b>Trees</b></p> <p>None</p> <p><b>Access to Open Space / Nature</b></p> <ul style="list-style-type: none"> <li>- Twickenham Cemetery (20m north of site) (150m width)</li> <li>- Other Open Land of Townscape Heritage Area (200m)</li> <li>- Site of Important Natural Conservation (SINAC)</li> <li>- There is a lively and attractive local shopping centre at New Malden Station. There are also local markets of New Malden and Sandycombe Road which provide for top-up shopping... the strategy for this area is to conserve the character, whilst enhancing existing facilities where appropriate (London of New Malden) (200m)</li> <li>- Crane Park East and Lincoln Park sports pitches (100m south) - Metropolitan Open Local (MOL)</li> </ul>	
228	David Wilson, Thames Water	Site Allocation 22 Whitton Community Centre, Percy Road, Whitton			<p>Thames Water <b>Site ID 75274</b></p> <p><b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxx to discuss the water infrastructure needs relating to the Local Plan.</p> <p><b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan.</p> <p><b>Additional Comments:</b> To provide a more detailed response we will require information on the scale of development.</p>		
229	Nick Dexter, Whitton Community Association	Site Allocation 22 Whitton Community Centre, Percy Road, Whitton	No	Effective	<p>We consider that the Local Plan will not achieve its aims for the borough unless it is clarified in the way we envisage.</p> <p><u>Introduction</u></p> <p>These comments are made on behalf of the trustees of WCA. There are two areas where we are seeking reassurance about the drafting of the Local Plan in the absence of which we are concerned that it will not achieve the stated policy aims for the borough and so might be unsound: the "Mixed Development" option; and the "100% Affordable Housing" option. We also offer some "Minor Corrections" to the Local Plan.</p> <p><u>The "Mixed Development" Option</u></p> <p>Site allocation 22 (page 108) proposes a mixed development of affordable housing and community use in any redevelopment of the existing Whitton Community Centre building ("WCC"). WCA does not have, and is not likely to have, access to funds sufficient to rebuild the WCC building when it is no longer fit for purpose. The Council are more likely to allocate funds for the re-provision of the building as part of a mixed development with affordable housing. However, the Local Plan is silent on how affordable housing will be combined with community use. This will need careful consideration. We would want to be reassured that the Local Plan as drafted would allow us, in any planning application, to raise issues such as: access; parking; sound insulation; rubbish/recycling; and security cameras and outside lighting. We need to be open seven days a week at what might be considered unsocial hours.</p> <p>WCC is unique in the Whitton/Heathfield area in having the Lambeth Hall which is 13m x 13m, approximately 4.4metres in height, and seats 150 guests. The hall is regularly let out until midnight on a Friday and Saturday. There is also the Fox room (65 guests) and the Trimble Lounge (80 guests). We would want to be reassured that the Local Plan as drafted would enable us to provide an equivalent level and variety of space. And this would need to be, as now, all on the ground floor, accessible to all.</p> <p>The WCC building currently meets the Local Plan's broad strategy for development that buildings should be adaptable and capable of multiple uses. The current building is certainly that. There are currently over 60 small business, activity sessions, charities, clubs, associations and support groups that call Whitton Community Centre their home. With at least 10 more that use us regularly once or twice a year. We would want to be assured that the Local Plan as drafted would not prevent us achieving the equivalent provision.</p> <p>And we would need to make provision during any temporary closure of the centre for these businesses/clubs to be able to continue. Without alternative accommodation they would face closure.</p> <p><u>The "100% Affordable Housing" option</u></p> <p>The first bullet point on page 110 references Local Plan Policy 49 Social and Community Infrastructure which proposes that should a scheme come forward for redevelopment or change of use to 100% genuinely affordable housing, in accordance with Policy 11 Affordable Housing in terms of mix, tenure and affordability, then it would not need to be considered for alternative social infrastructure use nor marketing evidence submitted. In those circumstances, a wholly</p>	<p>On page 108, in the first bullet point, in the last sentence beginning, "However, . . .", delete, "is seeking", and insert, "will provide"</p> <p>On page 108, add a bullet point, " Any planning application should safeguard the interests of all stakeholders concerned, including specific matters relating to combining community and residential use at this site."</p> <p>On page 109, in the right hand column, second bullet point, amend as appropriate to refer to Whitton High Street and not Kew Gardens Station, Kew Green and Sandycombe Road</p> <p>On page 109, alongside "Description of Current Site and Character" and the description of Whitton Community Centre to read, "Whitton Community Centre is a single storey standalone building with a large, double height hall to the rear, accessed from the . . .". And in the sentence beginning, "The community centre is run . . .", delete the words "and activities/services and the rest of the sentence, and replace by, ", activities/services, and including a food bank, aimed at the whole community, men and women, of all ages from small children to senior citizens."</p>	




						<p>affordable housing scheme would be supported. The bullet point goes on to state, "However, on this site the Council is seeking affordable housing with community/social infrastructure, due to the need to reprove the existing use". We would want to be assured that, should a 100% affordable housing scheme be proposed, that the Local Plan as drafted would require that scheme to be considered but once considered could then be rejected.</p> <p><u>"Minor Corrections"</u></p> <p>On page 109, at "Access to Open Space/Nature", the second bullet point wrongly refers to Kew Gardens Station etc. On page 109, at "Description of Current Site Character", WCC is referred to as a "part single, part two storey" building. But the building is all single storey. The correct description would be, "Whitton Community Centre is a single storey building with a double height hall to the rear. "Food bank" should be added to the list of activities and the description of the user group should be, "aimed at the whole community, men and women, of all ages from small children to senior citizens".</p>	
-						<b>Place-based Strategy for Ham, Petersham &amp; Richmond Park</b>	
230	Geoff Bond, <b>Ham &amp; Petersham Association &amp; Amenities Group</b>	Place-based Strategy for Ham, Petersham & Richmond Park				<p>The proposed bridge in Ham has some support but also significant opposition as it comes with considerable downsides. A new consultation that gives proper weight to the opinions of Ham and Petersham residents would give a clearer idea of support before money is spent on this project. Six storey buildings in the centre of Ham is in opposition to the area's neighbourhood plan that was widely consulted upon. Making the centre of Ham an area for high and mid sized buildings will be at odds to the low level, semi rural character of Ham and Petersham.</p> <p>The increasing protection for the margin of Grey Court school playing fields and an increased area of Ham Polo fields are welcome.</p> <p>There is insufficient consideration of the impact on recreation by increasing the SINC status designation to borough wide significance of Ham Common West side of the open space. This is currently used for informal recreation by local people and has been for as long as any local person can remember. It would be good for the local community, if a consideration for the cricket club could be made for a future clubhouse should any change to the use of the Cassel was made.</p>	
231	Graham <b>Martin</b>	Place-based Strategy for Ham, Petersham & Richmond Park		No	Positively Prepared	[See comment 183 in relation to the initial feasibility for a new pedestrian and cycle bridge Ham to Orleans Road Twickenham]	
232	Daniel <b>Reich</b>	Place-Based Strategy for Ham, Petersham & Richmond Park		No	Justified	<p>Can you please help to clarify where in Twickenham has been found to be the best location for a connecting pedestrian/cycle bridge to Ham?</p> <p>I'm referring to this text in the draft Local Plan:</p> <p>"Initial feasibility has been carried out for a new pedestrian and cycle bridge in the borough, with <b>the best location found to be connecting Ham to Twickenham</b>, with another suitable location identified as Ham to Radnor Gardens in Strawberry Hill. As set out in the Council's Third Local Implementation Plan, additional studies are required to determine the economic feasibility of the bridge, and funding for the bridge must still be found."</p> <p>[following Council clarification wording is from the current <a href="#">Local Implementation Plan</a>, and an initial <a href="#">feasibility study</a> from 2018, further comments received:]</p> <p>Many thanks for the clarification, and for sharing the link to the initial feasibility study.</p> <p>I have now read the documents and I have concerns regarding the proposed location of Bridge 15, mainly due to the increase in traffic this will cause. Orleans Road, which would provide the only car access to the bridge on the Twickenham side, is already heavily trafficked by cars carrying visitors to Marble Hill Park and Orleans House. The situation is similar on the Ham side, where a footbridge is likely to significantly increase car traffic to Ham Street Car Park.</p> <p>I cannot see any reference to a traffic or parking assessment as part of the considerations in the bridge feasibility study. Surely it would be preferable to place such a the bridge in a location where it would encourage an increase in pedestrian and bicycle access, without increasing car traffic? The proposed location of Bridge 13 seems much more suitable from that perspective.</p> <p>I would appreciate it if you could take my concerns into account when finalising the Local Plan.</p>	
233	Jon <b>Rowles</b>	Place-based Strategy for Ham, Petersham & Richmond Park				- The sustainability report states there is unlikely to be an impact on Richmond Park SAC, however, the Royal Parks Management Plan states that some areas of the park are under recreational stress. The report does not look at the cumulative impact of the London Plan Opportunity Area adjacent to the park in Kingston Upon Thames which will see thousands of extra homes built. I feel the council needs to look again at the impact on Richmond Park SAC and seek to divert some recreational use to other sites. The management Plan also supports	
234	Katherine Drew, <b>The Royal Parks</b>	Place-based Strategy for Ham, Petersham & Richmond Park - specific				<p>In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again.</p> <p>[See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 567 and 568 in relation to protection of open space and impacts including traffic]</p>	

		to biodiversity and the Royal Parks' Environmental Designations						
235	Rachel Holmes, Environment Agency	Place-based Strategy for Ham, Petersham & Richmond Park					<p><b>Section 2 – Site allocations</b></p> <p><b>Place-based strategy for Ham, Petersham &amp; Richmond Park</b></p> <p>We welcome that, in line with our Regulation 18 Consultation response, the 'Policy' section of the Place-based strategy for Ham, Petersham &amp; Richmond Park emphasises the need to improve the riverside environment.</p>	
-							<b>Site Allocation 23: Ham Close, Ham</b>	
236	David Wilson, Thames Water	Site Allocation 23 Ham Close, Ham					<p>Thames Water <b>Site ID</b> 49789</p> <p><b>Water Response:</b> The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p><b>Waste Response:</b> The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p>	
-							<b>Site Allocation 24: Cassel Hospital, Ham Common, Ham</b>	
237	David Wilson, Thames Water	Site Allocation 24 Cassel Hospital, Ham Common, Ham					<p>Thames Water <b>Site ID</b> 41238 (Reviewed Jan18)</p> <p><b>Water Response:</b> On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	
238	Nirali Vekaria (Lichfields), West London NHS Trust	Site Allocation 24 Cassel Hospital, pages 119, 120.	Yes	No	Yes	Justified; Effective	<p>Under the heading 'Description of current site character' on page 119, the operator of the site should be referred to as West London NHS Trust (rather than West London Mental Health Trust). This should be amended throughout the plan where appropriate.</p> <p>The West London NHS Trust (the Trust) supports the continued inclusion of Site Allocation 24 (Cassel Hospital) in the Local Plan. However, it objects to aspects of the policy.</p> <p>The Trust supports recognition that the conversion or potential redevelopment for residential uses could be considered, if it allows for the protection and restoration of the listed buildings. The strategic re-use of this underutilised, previously developed site is supported by para. 119 and 120(d) of the National Planning Policy Framework (NPPF). The Trust also supports recognition that they could retain the site partially or in full and that development proposals could come forward in whole or in part.</p> <p>However, Site Allocation 24 explains that if the site and hospital are declared surplus to requirements, social and community infrastructure uses are the most appropriate land uses for any development proposal. West London NHS Trust objects to this approach as, due to the complexity and costs involved in the re-use and conversion of historic buildings, alternative social and community infrastructure uses would not be viable. Nor is the approach consistent with London Plan Policy S1(G), which makes an allowance for instances where public service transformation is proposed. As such, the policy approach is not justified and is therefore unsound.</p> <p>In the case of Cassel Hospital, the site is close to becoming redundant in the medium term. A very small proportion of the site continues to be occupied by the Cassel Specialist Personality Disorder Service. That service would be relocated</p>	<p>The below amendments would make the policy sound.</p> <p>Bullet point 2 should read:</p> <p>"Only if other alternative social or community infrastructure uses have been explored, including marketing for a period of 6 months, <del>and options discounted in line with other policies in this Plan,</del> would a residential-led scheme with policy-compliant affordable housing (in line with a public sector land disposal be considered as a potential redevelopment option."</p> <p>Bullet point 3 should be removed because the complexity and cost associated with the re-use of listed buildings at Cassel Hospital cannot justify a 100% affordable housing scheme.</p> <p>Bullet point 7 should be removed entirely because it repeats policies elsewhere in the Local Plan, London Plan and National Planning Policy Framework.</p>

						<p>to alternative, smaller and more modern premises elsewhere, and better suited to meeting these clinical needs. As such, the community use within the existing buildings will not be lost.</p> <p>Re-use of the site for residential purposes, which is likely to include the conversion of existing listed buildings and some new build residential accommodation, is the optimal solution for the site and would help to contribute towards providing for the borough's and London's housing needs. Notwithstanding, there could be a community element as part of a residential-led, mixed use scheme, subject to demand.</p> <p>Expecting the Cassel Hospital site to re-provide social or community uses is not justified and will prevent or unnecessarily delay proposals coming forward for alternative uses. Accordingly, bullet point 3, which cross-references Policy 49 'Social and Community Infrastructure' should be removed. This latter policy requires an extensive period of marketing in the case of alternative proposals for existing social and community facilities. In the case of Cassel Hospital, owing to its size, environmental and historic context, the re-use of the site and buildings for alternative social and community use is not viable and expecting the Trust to market the site for a period of 18 months will unnecessarily delay making the site available, when it should instead be focusing efforts on bringing forward a high quality residential scheme and the re-use of redundant listed buildings, and using the funds to invest in wider public service transformation. If some marketing is deemed necessary, a reduced period of 6 months would be more appropriate and justified in this instance.</p> <p>Bullet point 3 explains that marketing of the site is not required in instances where a 100% policy compliant affordable housing scheme is provided. Due to the complexity and cost associated the the re-use of the listed buldings, a 100% affordable scheme at Cassel Hospital is not justified and reference to this should be removed.</p> <p>The policy explains that "Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with policy-compliant affordable housing (in line with a public sector land disposal) be considered as a potential redevelopment option." For the above reasons, the Trust objects to the requirement for alternative social and community infrastructure but supports the approach to affordable housing being provided in line with public sector land disposals, as required by London Plan Policy H5.</p> <p>The Trust questions if there is a need for the 7th bullet point which relates to heritage assets because this is captured by emerging Policy 29, London Plan Policy HC1 and the NPPF, and is unnecessary duplication.</p> <p>The Trust agree with the timescales set out for the delivery of Site Allocation 24. The Cassel Specialist Personality Disorder Service continue to occupy a small proportion of the buildings. The Trust is sensitive to this position and recognise the uncertainty around if/when the site may become surplus to requirements. In this regard, the medium timeframe identified seems appropriate at this time.</p>	
-	Geoff Bond, Ham & Petersham Association & Amenities Group					[See comment 230 in relation to a change of use of Cassel]	
-						<b>Place-based Strategy for Richmond &amp; Richmond Hill</b>	
239	Julie Scurr	General comments on Richmond area				<p>I am commenting specifically on what stands out for my local area:</p> <p><b>Richmond:</b> there is a theme around increasing coffee shops/restaurants/other food outlets, but surely Richmond already has more than enough of these already – how many coffee shops/eateries do we need? The plan is unimaginative and represents a lack of imagination. Richmond is supposed to be our premier shopping centre but there is actually very limited shopping available in Richmond, since the closure of House of Fraser, TopShop, H&amp;M. It should be a priority to attract this type of shop back to Richmond, especially with the closure of the Kew Retail Park. Surely, this would better fit your "20 minute neighbourhood" plan better?</p> <p>I also see that you are keen to increase the night time economy in Richmond. I certainly don't support this, and I suspect may other local residents don't either. Richmond has already lost its charm in the evenings, with large gatherings on The Green and by the river, and an increase in antisocial behaviour. Do we really want to promote this? We visit the cinema and theatres in Richmond regularly, but don't hang around afterwards for a bite to eat or a drink; it's just not the pleasant place it used to be. Looking to increase Richmond's night time economy can only increase this and should not be done without first securing a commitment to increased policing with a zero tolerance of anti social behaviour, and the return of our Police Station.</p> <p>The plan for the redevelopment of the station area is welcome; the open space outside the front entrance is a pretty unpleasant place at the moment, and not at all welcoming. However, do we really need a high rise build there? That is completely out of character to the surrounding area. Also, I think you should more fully explain what is meant by "vibrant active uses" which would contribute to the night time economy – this suggests further opportunities for anti social behaviour around the new station area.</p>	
240	Roger Byatt	Place-based strategy for Richmond and Richmond Hill				<p>George Street, Richmond</p> <p>Why no plans for pedestrianisation? Talk about 20 years behind the times.</p>	

241	Katherine Drew, <b>The Royal Parks</b>	Place-based Strategy for Richmond & Richmond Hill - specific to biodiversity and the Royal Parks' Environmental Designations					In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again. [See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 583 in relation to protection of open space and impacts including traffic]							
242	Craig Hatton, <b>Network Rail (Southern)</b>	Place-based strategy for Richmond & Richmond Hill					Overall, this place-based strategy is not sounds as it fails to fully consider improvements to access public transport facilities, including rail stations. The strategy notes a desire to 'improving the sense of arrival at North Sheen station' however this does not fully address improving access to the station. Given that, in the case of North Sheen, there are two site allocations which support significant re-development opportunities which are in close proximity to North Sheen station. Network Rail believe that the strategy should go further to secure improvements to the station to aid improved access.	To make this sound, Network Rail suggest that reference is made within the place-based strategy to 'actively seeking and promoting the securing of developer contributions and use of other third-party funding to improve access to the rail stations within the Place for all users, including those with mobility issues'. Opportunities for this include the provision of lifts at stations, improved access from the public highway and providing step-free access at stations, where this is required.						
243	Rachel Holmes, <b>Environment Agency</b>	Place-based Strategy for Richmond & Richmond Hill					<b>Place-based strategy for Richmond &amp; Richmond Hill</b> We welcome that, in line with our Regulation 18 Consultation response, the 'Policy' section of the Place-based strategy for Richmond & Richmond Hill emphasises the need to improve the riverside environment.							
244	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	Place-based strategy for Richmond & Richmond Hill					[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 586, 587, 588... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 586 in relation to the place definition for Richmond & Richmond Hill, comment 587 in relation to the title, and comment 588 in relation to Richmond BID]							
245	Peter Willan and Paul Velluet, <b>Old Deer Park Working Group</b>	General comment in relation to Old Deer Park					[See comment 21] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: 589... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 589 in relation to Old Deer Park]							
-							<b>Site Allocation 25: Richmond Station, Richmond</b>							
246	Louise Fluker, <b>The Richmond Society</b>	Site Allocation 25 Richmond Station, Richmond	Yes	No	Yes	Justified	The draft Local Plan refers to Richmond Station: "Its 1930 Art Deco façade and entrance/booking hall make it worthy of its BTM status, though the side and rear of the building is unattractive and is not considered to contribute to the setting" Developing buildings behind the station of 7-8 storeys runs the risk of making the facade (designed by the same architect who designed Surbiton Station which is listed) look ridiculous. The centre of Richmond is not a high rise area so anything more than the surrounding area will look out of place	Delete "a small area next to the station as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys)" from the paragraph which starts: "The Urban Design Study identifies "						
247	John Sadler, <b>CPRE London</b>	Site Allocation 25 Richmond Station, Richmond					Site Allocation 24: Richmond Station. [now Site Allocation 25] The car park next to the station should be removed and parking should not be re-provisioned, with the space used to create new public green space or mixed-used development. The space above the railway tracks should be kept open to promote attractive public transport.							
248	Richard Carr, <b>Transport for London (TfL)</b>	Site Allocation 25 Richmond Station, Richmond					<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Site Allocation 24 [now Site Allocation 25]: Richmond Station, Richmond</td> <td>We welcome the stated aim of a comprehensive approach including transport interchange improvements. We would expect to be closely involved in both the development of the SPD and early discussions about potential redevelopment plans. It would be helpful to make this expectation clear in the site allocation.</td> <td>We welcome the reference to a partnership approach with Network Rail and TfL.</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Site Allocation 24 [now Site Allocation 25]: Richmond Station, Richmond	We welcome the stated aim of a comprehensive approach including transport interchange improvements. We would expect to be closely involved in both the development of the SPD and early discussions about potential redevelopment plans. It would be helpful to make this expectation clear in the site allocation.	We welcome the reference to a partnership approach with Network Rail and TfL.	
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249	David Wilson, <b>Thames Water</b>	Site Allocation 25 Richmond Station, Richmond					Thames Water <b>Site ID 2113</b> (Reviewed Jan18) <b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and							



							scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan. <b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan. <b>Additional Comments:</b> To provide a more detailed response we will require information on the scale of development.	
250	Gerard Manley (Firstplan), Baden Prop Limited	Site Allocation 25 Richmond Station, Richmond	No	No	Yes	Positively Prepared; Justified; Consistent with national policy	<p>ROYAL BOROUGH OF RICHMOND UPON THAMES PROPOSED SUBMISSION (REGULATION 19) DRAFT LOCAL PLAN (CONSULTATION JULY 2023) REPRESENTATIONS MADE ON BEHALF OF BADEN PROP LIMITED</p> <p><b>a) Introduction</b> Our client, Baden Prop Limited ('BPL') has instructed us to make formal representations on the Royal Borough of Richmond upon Thames ('RBT')'s Proposed Submission (Regulation 19) Draft Local Plan. These representations are made in respect of RBT's consultation between June – July 2023. Our letter is supported by a completed response form.</p> <p>BPL is the principle owner of the mixed use building of Westminster House on Kew Road, Richmond, TW9 2ND. As such, they have a long-term interest in securing the future success of Richmond Town Centre and are sensitive to any current or emerging restrictive policies, designations and site allocation details which could jeopardise the regeneration potential of their site identified below at <b>Figure 1</b>.</p> <p>Firstplan have previously actively engaged with RBT on behalf of the building's former owner to help shape and facilitate appropriate growth in this part of the borough. Formal representations were made in August 2016 on RBT's consultation on the First Draft of the Richmond Local Plan, chiefly focusing on the site allocation wording and the drafting of a sustainable design policy. Revisions were subsequently made to the final adopted site allocation following Firstplan's involvement.</p>  <p><b>Figure 1.</b> Aerial view of Westminster House site (Google Maps 2023), outlined in red</p> <p>This letter comprises BPL's formal representations to RBT's Proposed Submission (Regulation 19) Draft Local Plan. Chiefly these representations challenge the soundness and legal compliance of the draft Local Plan in respect of the current drafting of Site Allocation 25 (Richmond Station, Richmond) in which our client's building is located within. Our representations specifically focus on the site allocation's wording around proposed uses and building heights. In addition to this, BPL's representation also challenges the unjustified designation of Westminster House within a Key Business Area ('KBA') as identified on the draft Policy Map and in the corresponding drafting of Policy 23 (Offices). Each of these matters is dealt with in turn below, but overall it is considered that the above issues have not been positively prepared, suitably justified nor are they consistent with national policy or in general conformity with the London Plan (as is required to be sound and legally compliant). These representations comply with the requirements in RBT's consultation response form, the guidance notes and the guidance set out within the National Planning Policy Framework ('NPPF') with regards to plan making. BPL would appreciate a meeting with RBT to fully understand the vision to develop the site allocation area and discuss how mutually acceptable wording can be incorporated.</p> <p><b>b) Background Information</b> i. Relevant Site Information Westminster House is a mixed use building set over five levels (including basement), with a consented gym use at basement level, commercial units at ground floor and office accommodation at first, second and third. The building was constructed in the 1950/60s and occupies a prominent position on Kew Road directly adjacent to Richmond Railway Station which sits immediately south of the site. The station car park sits to the rear of the building to the east. The surrounding area has a mix of commercial and retail buildings of varying age, height and materiality. These range from two and a half storeys to five storeys of both modern and traditional styles.</p>	<p><b>f) Changes BPL Require to Make the draft Local Plan 'Sound'</b> Response Form Question 7 requests suggested changes to be identified as being required to make the Richmond Proposed Submission Local Plan sound and legally compliant. We consider that the following changes are required in order to ensure that the draft Local Plan is positively prepared, justified and consistent with National and London-wide policy.</p> <p>i. <u>Proposed Site Allocation 25 Changes</u> <b>VISION: PROPOSED SITE, BULLET 3:</b> Any (<del>omit: commercial</del>) floorspace should enable the centre to grow and diversify in a way that brings vitality and viability and responds to changes in the retail and leisure/entertainment industries, providing commercial, business and service uses to serve the local community, create jobs and provide a destination for visitors (<del>add: and provide housing for new residents to</del>) bring(<del>omit: ing</del>) additional benefits to Richmond town centre. <b>VISION: PROPOSED SITE, BULLET 4:</b> The site is located in the borough's largest centre and therefore there is an expectation that any proposal makes provision for employment floorspace, particularly offices, which could be in the form of flexible shared workspaces (including a proportion of affordable workspace, (<del>add: subject to viability</del>)). However, to respond to changing market conditions, alternative uses can (subject to sufficient justification) also be appropriate). <b>VISION: PROPOSED SITE, BULLET 6:</b> The provision of housing (including policy-compliant affordable housing) in upper floors as part of a mixed-use (<del>add: or indeed as standalone residential extensions</del>) scheme would be appropriate (<del>add: inline with the London Plan's aspiration for Incremental Intensification at this location.</del>) Due to its location near a Tube, Overground and National Rail Station, the site would lend itself to a Build to Rent scheme (with policy-compliant levels of affordable rented units, (<del>add: subject to viability</del>)). <b>VISION: PROPOSED SITE, BULLET 10:</b> The Urban Design Study identifies a small area next to the station as a tall building zone (<del>add: including Westminster House</del>) (7-8 storeys(<del>add: +</del>)), with a mid-rise zone buffer (5-6 storeys(<del>add: +</del>)), with the opportunity for a landmark building(<del>add: s</del>) that is well designed and sensitive to identified constraints, in accordance with Policy 45 Tall and Mid-Rise Building Zones. It recognises that development (<del>add: must take account of</del>) the scale of (<del>add: some</del>) the surrounding buildings, the modest scale of The Quadrant, the proximity of the residential area to the south and a number of high value heritage assets. <b>VISION: PROPOSED SITE, BULLET 12:</b> Request that this bullet point is removed until a time that an upto date Development Brief has been prepared (given that the current one referred to was published in 2002). <b>APPENDIX 3, PAGE 414, 'RICHMOND CENTRE':</b> Amend Tall Building Zone so that it includes Westminster House. [See comment 411 in relation to Policy 23 and KBA's inclusion of Westminster House]</p>



				<p>The site has a somewhat complicated planning history with a number of planning applications having been submitted at the site in recent years. Of note, planning permission was granted in February 2016 (ref. 15/5230/FUL) for: <b>“a part one/part two storey roof extension providing 578 sq m of additional Class B1 office floorspace, external terraces and associated works”</b>.</p> <p>Following this, in May 2019 planning permission (ref. 19/0527/FUL) was then granted for: <b>“Creation of two additional levels of Class B1 office accommodation (482 sq m), conversion of the existing basement into Class D2 gym use (288.5 sq m) together with green walls and associated external refurbishments.”</b> However, due to changing market conditions instigated by the pandemic, and the rise in home working, it was not practical or viable for the owner of the site to implement the scheme.</p> <p>Planning permission was also granted in December 2022 (ref. 22/2962/FUL) for: <b>“Creation of a shopfront and access, elevational alterations, installation of louvres and associated works at basement and ground floor levels.”</b> This permission allows for the necessary physical works for the intended Gym operator to fit-out and occupy the basement level of building, from an area which was previously ancillary to the office space.</p> <p>The above permissions are critical to highlight in demonstrating RBT’s acceptance of upward extensions (in creating a 6/7 storey building at Westminster House) and in supporting works for non-office uses.</p> <p>In reviewing the planning history available on RBT’s website, it is understood that no conditions were attached on the original (or indeed any subsequent) permissions which restricting the use of the commercial floorspace (all levels of the building). As such it is considered that it has unrestricted Class E use. Although, RBT’s has established an Article 4 Direction which removed permitted development rights (under Class MA) to convert Class E uses to Class C3.</p> <p>As outlined above, the current (adopted) RBT Local Plan’s Policy Map (July 2018) identifies the site as falling within Site Allocation SA19: ‘Richmond Station’ together with Richmond Station, a car park to the rear of Westminster House and surrounding buildings. The site allocation refers to broad development parameters for this location and is outlined in more detail under the subsequent section of this letter.</p> <p>The site also lies with the Key Office Area (KOA’), which again encompasses a larger area surrounding the station and parts of the town centre. Another relevant designation of the site, as identified on RBT’s Policy Map is the ‘Secondary Shopping Frontage’ which relates to the ground floor units at Westminster House fronting Kew Road.</p> <p>Westminster House comprises offices at levels 1, 2 and 3. However, the building has experienced sustained, lengthy periods of vacancy for levels 1 and 3. Specifically from August 2021 to present (level 1) and from January 2022 to present (level 3) (circa 66% of the property’s office floorspace), have been entirely vacant and indeed marketed firmly for new commercial tenants during this period. However, no interest from prospective new tenants has been expressed throughout these entire periods, despite the KOA designation.</p> <p><b>c) Relevant Adopted Planning Policies</b></p> <p>Inline with the NPPF’s guidance in plan making, in order for the draft Local Plan to be sound and legally compliant it must be in general conformity with the NPPF and London Plan. As such, the relevant planning policies in place across the following tiers:</p> <ul style="list-style-type: none"> <li>• NPPF (adopted 2021);</li> <li>• The London Plan (Adopted 2021); and</li> <li>• RBT’s Local Plan (Adopted 2108).</li> </ul> <p><b>i. Plan-Making Policies</b></p> <p><b>The NPPF’s Paragraph 35</b> sets out the requirement that Local Plans need to be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. They are ‘sound’ where they are:</p> <p><b>“a) Positively prepared</b> – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p><b>b) Justified</b> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p><b>c) Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p><b>d) Consistent with national policy</b> – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”</p> <p><b>Paragraph 31 of the NPPF</b> relates to soundness in relation to the preparation and reviewing of local plans and states: <b>“...the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take account relevant market signals”</b>.</p> <p><b>ii. Site Allocation</b></p> <p><b>RBT’s adopted Local Plan, Site Allocation SA19 ‘Richmond Station’</b>. The allocation (area defined below at <b>Figure 2</b>) follows the publication of the Richmond Station Planning Brief in 2002 and has been brought forward from the previous UDP, which was prepared by RBT in conjunction with Network Rail. SA 19 seeks the comprehensive redevelopment of the site to provide an improved transport interchange and an appropriate mix of main centre uses. This includes as a priority the provision of retail floorspace as well as employment floorspace. Appropriate main centre uses, i.e. gyms and other employment generating uses and social infrastructure and community uses should also be provided. Despite the long-standing policy allocation, no redevelopment schemes have yet come forward to date.</p>	
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Figure 2: Plan showing land subject to Site Allocation SA19 (red line/hatching – site allocation, blue – site boundary)

iii. Tall-Building / Design Policies

The London Plan's Policy D9 relates to Tall Buildings and states:

**Definition:**

**A: Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.**

**Location:**

- 1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.
- 2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.
- 3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans."

The policy goes on to outline the visual, functional, environmental and cumulative impacts, which development proposals should consider when tall buildings are proposals. The supporting text at 3.9.1 also states: **"tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities."**

The adopted Local Plan Policy LP 2 relates to building heights and require new buildings, including extensions and redevelopment of existing buildings, to respect and strengthen the setting of the borough's valued townscapes and landscapes. This relies on officer judgement in assessing each site alongside the character appraisals published for certain areas.

iv. Town Centre and Housing Policies

The NPPF at Section 7 relates to the viability of town centres. Paragraph 86 states that planning policies should take a positive approach to the growth, management and adaption of town centres. Part a) states that planning policies should: **"...promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;"** (our underlining).

Part f) of the NPPF paragraph 86 goes on to state that planning policies should: **"...recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites"**.

Section 11 of the NPPF is associated with making effective use of land. Paragraph 119 states:

**"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land."**

Paragraph 120 of the NPPF goes on to note that 'Planning policies and decisions should:

- c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
- d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)."

Paragraph 122 of the NPPF sets out the following:

**"Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability."**

					<p><b>London Plan Policy H1</b> relates to increasing housing supply and sets target for housing completions for local authorities to achieve. Supporting text (at paragraph 4.1.8) encourages boroughs to identify as many areas as possible where housing can be increased (incremental intensification).</p> <p>London Plan Policy SD6 relates to town centres and high street and encourages: <i>“...diverse range of uses that meet the needs of Londoners, including main town centre uses, night-time economy, civic, community, social and residential uses” (part A, 1).</i></p> <p>Part D of London Plan Policy SD6 then goes on to support the potential town centres have: <i>“...for new housing within and on the edges of town centres should be realised through mixed-use or residential development that makes best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.”</i></p> <p>With part E of <b>London Plan Policy SD6</b> also stating: <i>“The redevelopment, change of use and intensification of identified surplus office space to other uses including housing should be supported, taking into account the impact of office to residential permitted development rights...”</i></p> <p><b>Local Plan Policy LP 25</b> is associated with development in centres and advises that RBT will support developments which contribute towards a suitable mix of uses that enhance the vitality and viability of the centre. This focuses heavily on the protection of retail floorspace and particularly seeks to restrict excessive consecutive non-former A1 use within retail terraces. This was published prior to the use class order change of September 2020 bringing in Class E.</p> <p><b>Local Plan Policy LP 26</b> relates to retail frontages and seeks to resist loss of floorspace in the former Class A1 use class within such designated frontages. Conversion of former Class A1 uses was supported to other commercial uses provided that a community need was met or that the use fell within similar former A-Class uses / provides customer-focused service.</p> <p>Whilst it is accepted that the significant use class order changes of September 2020, brought about a major shake-up for the approach to commercial uses of units which had previously been protected / required planning policy assessment for any conversions required, Part F of this policy stipulated: <i>“F. Where a proposal involves a change of use not supported by policy, the Council will require satisfactory evidence of full and proper marketing of the site. The applicant will be expected to undertake marketing in line with the requirements set out in Appendix 5.”</i> This again, supports the notion that marketing evidence is crucial to demonstrating a site-specific difficulty to retain occupancy of units. Indeed RBT have previously seen it fit to accept marketing as a material consideration in application of changes of uses.</p> <p><u>v. Employment Land Policies</u></p> <p><b>The London Plan’s Policy E1</b> relates to the offices and identifies (at Part C) particular areas in London where office development is considered nationally significant and as such should be developed and promoted. Westminster House does not fall within one of these locations.</p> <p>Part D of the policy does support a focus on consolidating and, where possible, extending office developments within town centres. Item 4 of Part D includes a focus of developments, namely: <i>“locally-oriented, town centre office provision to meet local needs.”</i></p> <p>Part E outlines the position on existing viable office floorspace (outside of those nationally-significant locations in Part C), requiring retention of such floorspace, but with supporting the renewal and re-provision of office space where viable / releasing surplus office capacity to other uses.</p> <p>Part H of this policy states that: <i>“The scope for the re-use of otherwise surplus large office spaces for smaller office units should be explored.”</i> With Part I noting that the London Plan does support the redevelopment, intensification and change of use of surplus office floorspace to other uses including housing subject to provisions of the need for a range of workspaces in the area and part H (above).</p> <p>The supporting text for London Plan Policy E1 (at 6.1.2) acknowledges that the office market is undergoing a <i>“period of reconstructing”</i> with (amongst other evolutive changes) <i>“changing work styles supportive by advances in technology”</i>.</p> <p>In addition, supporting text 6.1.7 defines surplus office space as that which such sites which no longer have a reasonable prospect of being used again for the purposes of business. With this, the value of evidence to demonstrate periods of vacancy and marketing (min 12 months) is highlighted as a key determining factor in informing the viability of surplus offices.</p> <p><b>Adopted Local Plan Policy LP41</b> also relates to offices. Part A of this policy sets out that RBT have a presumption against the loss of office floorspace in all parts of the borough. However, RBT can currently support loss of offices on sites which fall outside of a KOA designation when two criteria are met - robust and compelling evidence confirming that there is no longer any office demand for the floorspace, and in applying a sequential approach to redevelopment / change of use.</p> <p>An extract of the KOA boundary in respect of out client’s site is provided below:</p>	
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**Figure 3:** Extract from adopted Local Plan (2018) (dotted blue – KBA, red line - Site)

In relation to those sites which do fall within KOAs (such as BPL’s Westminster House), Part C of the policy states: **“Net loss of office floorspace will not be permitted. Any development proposals for new employment or mixed use floorspace should contribute to a new increase in office floorspace where feasible. Criteria 1 and 2 in A (above) do not apply to the Key Office Areas”**

Whilst Policy 41’s supporting text (at paragraph 10.2.7) confirms that the areas covered KOAs were designated due to their identified importance for office employment space, it is important to consider that RBT’s Local Plan was adopted to be consistent with the now superseded 2016 London Plan. At the time of drafting the 2016 London Plan, the office market was vastly different (as acknowledged at Policy E1 of the London in more recent restructuring of this commercial sector).

**d) Review of Draft Site Allocation, Evidence Base, Draft Policies**

This section of our letter details RBT’s relevant evidence base documents which have been produced in the preparation of the draft Local Plan. The evidence base documents referred to below include both documents which were prepared for the Regulation 18 and Regulation 19 stages of RBT’s draft local plan. This section also lists and comments on the draft site allocation for the area encompassing BPL’s building as well as draft policies of relevance.

**i. Draft Site Allocation**

*Site Allocation 25 of the draft Local Plan (2023)*

**The draft Local Plan’s Site Allocation 25** ‘Richmond Station, Richmond’ includes our client’s site. This allocation area retains the same boundary as the adopted SA19 site allocation, and generally encourages a similar mix of uses, i.e. leisure, offices, community uses with upper floor residential. See the inclusion area at **Figure 4**, below. Whilst retail is still supported, emphasis has lessened in the site allocation wording over the adopted allocation.



**Figure 4:** Extract from draft Site Allocation 25 (2023) (red – site allocation, blue – site boundary)

BPL supports the site allocation for the proposed mix of uses. However, for the arguments in relation to the KBA, it is considered that too much weight is still given in the site allocation wording in supporting new offices at this location. Given what the 2023 Employment Land and Premises Needs Assessment has identified, there has been a significant reduction in the requirement for office use across the borough. As such, it is unjustified to retain the similar level of support for retaining existing and creating new office floorspace as with the adopted Site Allocation SA 19. Office uses should in this instance make way for other uses, such as residential (which remains in high demand), indeed if RBT intend to have a reasonable buffer in meeting their housing trajectory.

The current building has three office level, as noted at ‘subheading b)’ of this letter, two of the levels of Westminster house have been vacant and marketed unsuccessfully for a considerable length of time (level 1 – 23 months, level 3 – 18 months). Further to this, following a review with local marketing agents, there are a considerable number of vacant, former office units currently being marketed within the KBA locality of our client’s site. A list of a number of these (within a radius of circa 1KM) which are currently on the market (in addition to the two units at Westminster House) is provided below at **Table 1:**



Address	Unit Size	Status
Argyle House, Dee Road, Richmond Upon Thames TW9	418 sq m	Vacant
36B Rosedale Road, Richmond, TW9 2SX	126 sq m	Vacant
1 Commerce Road, Brentford, TW8 8LH	134 sq m	Vacant
Times Court, Retreat Road, Richmond TW9	644 sq m	Soon to be vacant
6 Printworks House, 27 Dunstable Road, Richmond TW9	88 sq m	Vacant

**Table 1:** List of some of the currently marketed office units within 1KM of Westminster House

Furthermore, the former owner of our client's site, was unable to implement the planning permission (ref. 19/0527/FUL) which allowed for two further levels of additional offices, owing to a change of market conditions and lower demand for office floorspace than had been anticipated at the time of designing the scheme. As such, based on the above, BPL consider that additional offices at this location does not meet a local need, and so retention of existing and promotion of new offices shouldn't be obligated as part of the site allocation wording. Therefore, to ensure occupancy of the existing and future needs of the building, alternative uses (such as residential across all levels of buildings within the site allocation catchment) should be more firmly encouraged.

In relation to building heights, this allocation now introduces a suggested max building heights of upto 5 – 8 storeys (inline with the tall building zone mapping), see **Figure 5**, below. This Tall Building zoning doesn't include Westminster House. BPL strongly supports tall buildings within the area of this site allocation, and indeed even higher than the 8 storeys suggested. However, no evidence is provided as to why Westminster House has not been included in the tall building (or-even the mid-rise building) zone.

Currently Westminster House stands as a four-storeys plus basement (which is largely exposed at the rear), so stands five storeys at the rear. Planning permission (refs. 15/52530/FUL and 19/0527/FUL) have been granted in February 2016 and May 2019 respectively for two upper levels, which indeed would have made this 6-7 storeys (moving into the London Plan's 'Tall Building' definition).

In light of this, there has clearly already been acceptance by RBT (indeed evidence) that a tall building at Westminster House would be acceptable and so this should be reflected in the site allocation wording, where currently Westminster House is excluded.

ii. Tall building / Design Evidence Base Policies

*2021 Urban Design Study*

The study was completed and published in 2021 to accompany the Draft Pre-Publication Regulation 18 version of the Local Plan. 'Richmond Town Centre and Riverside' is identified on accompanying maps as reference F1. Westminster House is not specifically mentioned with this document; however it is noted that: **'Postwar infill buildings often detract from the high quality historic buildings and otherwise high quality of the streetscape.'**

With regards to building heights, it is stated 'Buildings are 2-3 storeys in the historic part of the town centre and 3-4 storeys along the high street. Characteristic materials and features include gables, mixture of brick, stone and render. However no mention was given as to the acceptability of extra height at that time.

*2021 Urban Design Study*

This updated study includes a townscape character assessment and an assessment of the borough's capacity for growth, bringing together the values, character and sensitivity of different parts of the borough with the reality of future development pressures. It also identifies 'Richmond Town Centre and Riverside' with reference F1.

This updated study includes 'Tall Buildings Zones' within each character area. Potential areas of increased height opportunity are highlighted in the strategy map for area and feeds into the site allocations. RBT's testing is understood to consider potentially appropriate heights alongside likely development potential, and the potential impacts they may have on townscape, views and heritage. The outcome of this process are tall buildings zones maps and mid-rise buildings zones maps indicating where in the borough tall and mid-rise buildings may be appropriate.

For reference F1, we note that it includes a tall and mid-rise building zone which predominantly covers the Richmond Station building but also indicates additional height in the area immediately behind (east) of Westminster House (see **Figure 5** below), but not including BPL's building. These suggested tall and mid-rise buildings zones maps form the **draft Appendix 3** of the Local Plan.





**Figure 5:** Extract from the Richmond and Richmond Hill combined Tall and Mid-rise Buildings Zone map in the Urban Design Study (2023) and at Appendix 3 of the draft Local Plan. (Westminster House is outlined in blue).

*Draft Policy 45*

**Draft Policy 45** relates to the tall and mid-rise building zones and seeks to support introducing such buildings / extensions to existing buildings in the identified zones marked in draft **Appendix 3** of the Local Plan. Tall buildings are defined as those which are 7 storeys or over (or 21 metres or more) and mid-rise buildings which are 5 storeys or over (15 metres or more) from the ground level to the top of the building.

iii. Town Centre and Housing Evidence Base and Draft Policies

*Town Centre, Retail and Leisure Study (2021)*

This report provides an overview of trends and recent changes that will affect the demand for main town centre uses, updates the retail and food/beverage floorspace capacity assessment and assesses other main town centre uses including the scope for leisure, entertainment and cultural uses. This reiterates the NPPF's push for diversification of town centre uses, including residential.

*Town Centre, Retail and Leisure Study (2023)*

This updated study, further supports the need to diversify with the changing demands of town centre locations (lesser focus on protection of retail in light of the flexible use of Class E). In addition, this also notes the main implications of Brexit, the Covid-19 pandemic and the cost of living crises. Indeed, it notes at paragraph 2.6: **"Bearing these trends in mind there has been a spike in town centre vacancies"**, identifying a general awareness how sensitive town centre units can be at this stage, and so one could argue that allowing maximum flexibility should go somewhat in seeking to secure long-term occupancy levels.

Notwithstanding the above, as noted at 'subheading b)' of this letter, Westminster House's commercial floorspace is not restricted by means planning conditions or Article 4 Directions for changes of uses from Class to E to other commercial uses. Residential uses are just restricted (under a Class MA restricted via permitted development), by means of an Article 4 Direction.

*Draft Policy 18*

**Draft Local Plan Policy 18** relates to development in centres and supports developments which are in keeping with the centre's role and function. Part D relates to residential uses in centres and supports:

**1. "High density mixed-use development, including residential, will be supported in appropriate locations, as identified within Site Allocations and Policy 45 'Tall and Mid-Rise Building Zones', subject to compliance with Policy 28 'Local Character and Design Quality (Strategic Policy)' and other policies in this Plan.**

**2. Conversion to residential of upper floors, the rear of ground floor occupied by a commercial or community use will be permitted, where this can be designed to provide a high level of residential amenity without compromising the existing or potential operation of uses on the ground floor."**

BLP are generally accepting in how this policy and its supporting text has been drafted.

*2021 Local Housing Needs Assessment*

Housing requirement for the borough over the new plan period was originally outlined in this report (as part of the Regulation 18 stage of the Plan. This required consistency in terms of housing target numbers with the London Plan (i.e. 4, 110 homes until 2029).

*2023 Local Housing Needs Assessment*

This document within RBT's evidence base retains the above noted housing targets and seeks to help guide RBT as to the different types of housing needed across the borough.

*Housing Trajectory*

In March 2023, RBT issued their Annual Housing Monitoring report for a year period 2021 to 2022. This considers that RBT have a 5-year supply, indeed they have 5.3 years' worth of homes being constructed, with planning permission and those which are identified in site allocations.

*Draft Policy 10*

Draft Local Plan Policy 10 confirms the 10-year target of 4,110 homes (as detailed above / within the London Plan). Of particular note, RBT claim in the supporting text that this target can be met should all suitable and available brownfield

sites be optimised for housing delivery. In addition, the supporting text to this policy (at paragraph 17.9) acknowledges that: **“although there may be limited potential for enabling housing gain on employment land if proposals comply with the requirements of Policies 23 and 24.”**

iv. Employment Land Evidence Base and Draft Policies

2021 Employment Land and Premises Needs Assessment

This document discusses the need for employment land / uses in Richmond. At the time of its drafting, the document noting that there was an office floorspace need of 73,000 sq m across the borough. This therefore strongly advised policy makers to tighten employment land protection through the strengthening of adopted policies.

2023 Employment Land and Premises Needs Assessment

An update the above 2021 report was produced, feeding into the Regulation 19 evidence base for the draft Local Plan. This acknowledged a change in circumstances over the two year period, particularly in noting sustained rates of vacancy in the office floorspace sector. Indeed, the future need as reported in this assessment reduced the office floorspace need down to 23,000 sq m, with it also being noted that 15,000 sq m of office floorspace could be lost before the threshold is considered to tip into needing stronger policies for employment land protection.

i. Draft Policy 23

**Draft Local Plan Policy 23** relates to Offices suggests a need to resist any loss of offices in stating: **“There is a presumption against the loss of office floorspace in all parts of the borough. Proposals which result in a net loss of office floorspace will be refused. Any refurbishment of existing office floorspace should improve the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) as set out in London Plan Policy E1.”**

As noted above, the 2023 Employment Land and Premise Needs Assessment identifies that there has been a significant reduction in the need for new office floorspace. Indeed, the assessment considered that there could even be a further loss of existing stock (upto 15,000 sq m) before it would be necessary to strengthen adopted office floor protection policies.

Notwithstanding this, this draft policy is more strongly worded and more restrictive than the adopted Policy LP 41 position, with removal a mechanism to convert existing offices to other uses accompanied vacancy / marketing information. This stronger wording is not considered to be guided by the most upto date evidence base.

It is also noted in the supporting text for this policy (at paragraph 19.17) that the provision of marketing evidence would form a **“material planning consideration”** in proposing a change of use which isn’t supported by policy. With this in mind, it is clear that RBT appreciate the value a robust demonstration of vacancy / marketing evidence and is it unclear why therefore this mechanism has not been included in the office policy.

Whilst not referred to in the Office policy above, p.258 of the draft Local Plan notes that all existing Key Office Areas would be renamed ‘Key Business Areas’ (with the exception of one isolated site). An extract of the draft Local Plan Map , identifying the site and KBA designation, is provided at **Figure 6** below. The Article 4 Direction which restricts the conversion of commercial buildings to residential through Class MA of the GPDO covers the same KBA area.



**Figure 6:** Extract from draft Local Plan (reg 19, 2023) (dotted blue – KBA, red line - Site)

e) BPL’s Response to the Soundness and Legal Compliance of the Draft Local Plan

Following the review of the relevant adopted planning policies and draft Local Plan’s evidence base, draft site allocation and draft policies, BPL wish to the challenge the soundness and legal compliance of the following matters:

- Site Allocation 25 – Text concerning proposed uses and building heights is not justified and is not in line with the provisions of the London Plan;
- KBA’s inclusion of Westminster House – Designation is not justified; and
- Draft Policy 23, Offices – Stronger / more restrictive policy word over adopted position is not justified and wording not consistent with the NPPF or the London Plan.

These matters are discussed in turn below in responding to question 4 on the accompanying consultation response form. The draft Local Plan is not considered to meet the tests of soundness for the reasons outlined below:

i. Site Allocation 25 – Text concerning proposed uses and building heights is not justified and is not inline with the provisions of the London Plan

The test for soundness in this respect is summarised below:

						<p style="text-align: center;"><b>The Plan is not prepared positively</b></p> <p>In maintaining a strong promotion for office floorspace being a priority, the site allocation fails to acknowledge the data within the 2023 Employment Land and Premise Needs Assessment, which identifies a significant reduction in the need for new offices. Indeed the assessment acknowledges that the Richmond authority area could be withstand a considerable loss of office space before RBT are required to strengthen their office protection policy.</p> <p>In a similar manner, the site allocation needs to acknowledge the prolonged period of vacancy with marketing at Westminster House, along with the aforementioned listed at <b>Table 1</b> of currently marketed former office units in the vicinity. The wording of Site Allocation 25 should therefore be more flexible to reflect localised demand and the release of surplus office accommodation for more beneficial land uses (such as residential).</p> <p style="text-align: center;"><b>The Plan has not been justified</b></p> <p>The Council have granted two planning permissions at Westminster House for two upper levels (under permission refs. 15/530/FUL and 19/0527/FUL) in February 2016 and May 2019 (to create a 6/7-storey building). However, whilst some areas of the site allocation coverage are identified as being appropriate for tall buildings, Westminster House has been excluded from the tall or indeed the mid-rise building identification. It would be 'sound' to include Westminster in the tall building identification at Appendix 3 of the draft Local Plan.</p> <p>In addition, the 2023 Employment Land and Premises Needs Assessment demonstrates a significant change in office demand, and this has not been reflected in the drafting of draft the Site Allocation 25 text. With the suggestions made in the up to date evidence, it would be expected for less emphasis to be placed on retaining existing and creating new office floorspace in Site Allocation 25 over the adopted position (SA 19). However, the retention of the language used is not justified.</p> <p>It would be 'sound' to acknowledge within the Site Allocation text changing market condition, with lesser emphasis on the need for more office floorspace and more emphasis for alternative uses (such as residential).</p> <p style="text-align: center;"><b>The Plan is not consistent with National or London-wide Policy</b></p> <p>The wording of the site allocation fails to align with the position in the London Plan, which (within the supporting text of Policy H1) encourages all London authorities to allocate certain areas within an 'Incremental Intensification' zone where more residential floorspace is actively encouraged. Whilst RBT have identified the Site as falling within this designation on their draft Policy Map, acknowledgement of this designation has not been carried over to Site Allocation wording, and should be for conformity.</p> <p>[See comment 411 in relation to Policy 23 and KBA's inclusion of Westminster House]</p>	
251	Craig Hatton, <b>Network Rail (Southern)</b>	Richmond Station Site Allocation 25				Network Rail supports the allocation of this site and the opportunities brought forward by this. Any non-railway development should be undertaken so as not to impact upon passengers or the efficient running of the railway. As part of the allocation, opportunities should be sought to capture improvements to the station itself.	
252	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	Richmond Station Site Allocation 25				[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 596... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 596 in relation to this Site Allocation]	
-	Peter Willan and Paul Velluet, <b>Old Deer Park Working Group</b>					[See comment 519 in respect of Policy 45 and high rise development which refer to Richmond Station]	
-	Julie Scurr					[See comment 239 in relation to the redevelopment of the station area]	
-						<b>Site Allocation 26: Former House of Fraser, Richmond</b>	



253	David Wilson, <b>Thames Water</b>	Site Allocation 26 Former House of Fraser, Richmond				<p>Thames Water <b>Site ID 62913</b></p> <p><b>Water Response:</b> On the information available to date we do not envisage concerns regarding water treatment capacity in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	
254	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	Site Allocation 26 Former House of Fraser, Richmond				<p>[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 597...</p> <p>[See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 597 in relation to this Site Allocation]</p>	
-						<b>Site Allocation 27: Richmond Telephone Exchange, Spring Terrace, Richmond</b>	
255	David Wilson, <b>Thames Water</b>	Site Allocation 27 Richmond Telephone Exchange, Spring Terrace, Richmond				<p>Thames Water <b>Site ID 75276</b></p> <p><b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan.</p> <p><b>Waste Response:</b> The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.</p>	
256	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	Site Allocation 27 Richmond Telephone Exchange, Spring Terrace, Richmond				<p>[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 600...</p> <p>[See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 600 in relation to this Site Allocation]</p>	
-						<b>Site Allocation 28: American University, Queens Road, Richmond</b>	
257	David Wilson, <b>Thames Water</b>	Site Allocation 28 American University, Queens Road, Richmond				<p>Thames Water <b>Site ID 75277</b></p> <p><b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan.</p> <p><b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan.</p> <p><b>Additional Comments:</b> To provide a more detailed response we will require information on the scale of development.</p>	

258	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	Site Allocation 28 American University, Queens Road, Richmond				[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 603... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 603 in relation to this Site Allocation]							
-						<b>Site Allocation 29: Homebase, Manor Road, North Sheen</b>							
259	Chris Toop	Site Allocation 29 Homebase, Manor Road, North Sheen	N	o	Positively Prepared	I object strongly to the inclusion of Kew Retail Park and the Homebase site, as locations for major developments. This is contrary to the wishes of the vast majority of residents and yet makes planning approval so much easier for would be developers.							
260	Richard Carr, <b>Transport for London (TfL)</b>	Site Allocation 29: Homebase, Manor Road, North Sheen				<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Site Allocation 28 [now Site Allocation 29]: Homebase, Manor Road, East Sheen</td> <td>We welcome the requirement for the retention of the existing bus terminus. It would be helpful to clarify that this comprises both bus standing and drivers' facilities, and that they should be retained and enhanced in any redevelopment in consultation with TfL. The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.</td> <td>In relation to the retention of the bus terminus we welcome the addition of references to adequate standing capacity and drivers' facilities.  We welcome the reference to engagement with TfL to ensure development does not lead to unacceptable impacts on the local road network</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Site Allocation 28 [now Site Allocation 29]: Homebase, Manor Road, East Sheen	We welcome the requirement for the retention of the existing bus terminus. It would be helpful to clarify that this comprises both bus standing and drivers' facilities, and that they should be retained and enhanced in any redevelopment in consultation with TfL. The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.	In relation to the retention of the bus terminus we welcome the addition of references to adequate standing capacity and drivers' facilities.  We welcome the reference to engagement with TfL to ensure development does not lead to unacceptable impacts on the local road network	
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261	David Wilson, <b>Thames Water</b>	Site Allocation 29 Homebase, Manor Road, North Sheen				<p>Thames Water <b>Site ID</b> 53531 (PENDING - Reviewed 30/12/21)</p> <p><b>Water Response:</b> On the information available to date we do not envisage concerns regarding water treatment capacity in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Additional Comments:</b> This is based on the site draining via infiltration..</p>							
262	Craig Hatton, <b>Network Rail (Southern)</b>	Site Allocation 29 Homebase, Manor Road, North Sheen				Network Rail supports the allocation of this site and notes that there is an application currently subject to determination by the Mayor of London. The proximity of the site to North Sheen train station provides opportunity to secure improvements to this given the anticipated increase in users from the development. The station could benefit from improved facilities, including improving the footbridge and the provision of cycle storage. Additionally, there is a level crossing located adjacent to the development site. The crossing is mitigated to an extent by the existing footbridge however the re-development would likely bring an increase in the number of pedestrians, cyclists and vehicles into conflict with this crossing and the railway line. It is therefore essential the level crossing is included within the site allocation and that reference is made for the potential to secure any further safety mitigations as deemed necessary. from this development, to protect both rail passengers and members of the public when using the crossing.							
263	Smruti Patel (Avison Young), <b>Avanton Richmond Developments LTD</b>	Site Allocation 29 Homebase, Manor Road, North Sheen	N	o	Positively Prepared; Justified; Consistent with national policy	<p>We write on behalf of Avanton Richmond Developments Ltd (the "Developers") in representation to the Richmond Local Plan 'The best for our borough' Draft for consultation (9 June 2023) prepared by the London Borough of Richmond upon Thames ("LBRuT"), under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.</p> <p>Avanton Richmond Developments Ltd is a dynamic and progressive London property development company that collaborates with the finest architects, landscapers, designers and contractors, to create places where people love to live, work and enjoy. They develop places that are innovative and inspiring, appreciated both for their design and for their quality. Avanton are bringing forward the residential redevelopment of Homebase, Manor Road, North Sheen (the "Site").</p>							



					<p>Having reviewed the Regulation 19 version of the draft Local Plan and the accompanying evidence base documents, this letter provides a summary of the site and background, responses to individual policies as well as further comments on the development potential of the Site (Site Allocation 29: Homebase, Manor Road, North Sheen).</p> <p>The Developers support the Vision for LBRuT as set out in the draft Local Plan, in particular the delivery of new homes and affordable homes, and the proposed allocation of Homebase, Manor Road for residential-led redevelopment. The principle of redeveloping the Site for residential uses is firmly aligned with the objectives of national and London Plan policy and it represents a significant opportunity to bring forward an underutilised brownfield site to meet the needs of the LBRuT and London.</p> <p>We do however, have significant concerns about the soundness of the plan, particularly in relation to the height, scale and massing considerations related to the proposed site allocation.</p> <p>The developers are keen to work with the Council to deliver the optimal development solution for the Site. Crucial to this is ensuring the local plan incorporates an appropriately supportive site-specific policy to act as the basis for future decision making on the site and more broadly, ensuring the content of the plan as a whole is sound.</p> <p>The purpose of these representations is to make recommendations on how the site-specific policy must be updated to respond to identified issues of soundness, to ensure the plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan. We hope that the comments on the individual policies within the draft Local Plan provided below will assist the Council in preparing its final Submission Local Plan and during its examination.</p> <p><b>CONTEXT OF THE REPRESENTATION (HOMEBASE, MANOR ROAD)</b></p> <p>This section summarises the site and surrounding area, planning history and the development proposals at Homebase, Manor Road, North Sheen.</p> <p><b>Site and Surrounding Area</b></p> <p>Homebase, Manor Road (the “Site”) currently accommodates a vacant retail warehouse unit, formerly occupied by Homebase and Pets at Home (Use Class E), associated surface car parking and a small bus layby in the north of the Site. The retail warehouse is approximately 5,287sqm and the car park provides 174 parking spaces.</p> <p>The Site extends to approximately 1.5 hectares and is bound to the north by Manor Road Circus a roundabout where the A316 and B353 meet), to the east by Manor Road (with residential development and Sainsbury’s beyond), to the south and west by the railway (with residential development beyond in both cases). The railway to the south is the South Western Railway main line and the railway to the west is part of the London Overground / Underground network.</p> <p>The surrounding uses in the area are predominantly residential with some light industrial and retail uses. The closest Conservation Areas to the Site are Sheendale Road (to the west) and Sheen Road (southwest of the Site). There are a number of Buildings of Townscape Merit in the vicinity of the Site, for example along Manor Grove to the east.</p> <p><b>Planning History</b></p> <p>A planning application for the redevelopment of the Site was submitted to the LBRuT in February 2019 (ref.19/0510/FUL) and was considered at the LBRuT Planning Committee on 03 July 2019. The Planning Committee resolved that they were minded to refuse the application. However, on 29 July 2019, it was confirmed that the Mayor of London would act as the Local Planning Authority for the purposes of determining the application.</p> <p>Following review of the LBRuT’s reasons for refusal and discussions with Officers at the Greater London Authority (“GLA”) and Transport for London (“TfL”), the Developer sought to review the scheme, with the principle aim of increasing the delivery of affordable housing through additional density and addressing other issues raised in the Mayor’s Stage 2 Report. An amended submission was made to the GLA in July 2020, which increase the number of residential units from 385 (as per the February 2019 submission) to 453. The increase in units was principally achieved through amendments to the height and internal layout in appropriate locations across the Site. Additionally, the affordable housing offer was increased from 35% by habitable room to 40% by habitable room, thereby allowing a provision of 173 units in total.</p> <p>The revised scheme was considered at a Mayoral Representation Hearing on 01 October 2020, whereby the Mayor of London resolved to grant planning permission subject to the completion of a S106 Agreement.</p> <p>Whilst discussions were ongoing regard the S106 Agreement, the new London Plan was adopted in March 2021. As such, the affordable housing offer was updated to meet the requirements set out in policy H6 of the London Plan. In June 2022, the GLA published an update report which maintained the resolution to grant planning permission and that the proposals remained in overall conformity with the Development Plan.</p> <p><b>Development Proposals</b></p> <p>The application for the Site, which remains with the GLA as the Local Planning Authority, seeks to provide 453 residential units with 40% affordable housing by habitable room (173 units); c. 500 sqm of flexible commercial space (retail/ community/ office) and public realm enhancements. This density has been considered appropriate to the Site context by the GLA in their July 2020 Hearing Report and November 2021 Update Report.</p> <p>The proposals would create four buildings – Blocks A, B C and D – with varying heights. Blocks A and D would comprise a maximum of eight storeys, Block B would comprise 11 storeys and Block C would comprise a maximum of 10 storeys. The massing is refined to incorporate a series of steps, building up to maximum heights and a lower height of four storeys to the Manor Road frontage. Additionally, the layout has been optimised to deliver appropriate open spaces, play provision and a high quality public realm for occupiers and users.</p>	
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					<p><b>Plan-Making Policy</b></p> <p>Section 3 of the National Planning Policy Framework (2021) (NPPF) sets out the manner in which plans should be prepared. Specifically, paragraph 31 requires all policies to be underpinned by relevant and up-to-date evidence that is adequate and proportionate, focused tightly on supporting and justifying the policies concerned and taking into account relevant market signals.</p> <p>Paragraph 34 requires plans to set out the contributions expected from development, including the level and type of affordable housing provision along with other infrastructure (i.e. education, health, transport, flood and water management). However, these policies should not undermine the deliverability of the plan.</p> <p>Overarchingly, paragraph 35 requires local plans to be sound, noting that plans are ‘sound’ if they are:</p> <ul style="list-style-type: none"> <li>- <b>Positively prepared</b> – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and consistent with achieving sustainable development;</li> <li>- <b>Justified</b> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</li> <li>- <b>Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidence by the statement of common ground; and</li> <li>- <b>Consistent with national policy</b> – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.</li> </ul> <p>Additionally, the London Plan is legally part of each of London’s Local Planning Authorities’ Development Plan and all Development Plan Documents have to be ‘in general conformity’ with the London Plan. It is important to note that the London Plan does not preclude boroughs from bringing forward policies that vary from the detail of the policies in the London Plan where locally-specific circumstances and evidence suggest this would better achieve the objectives of the London Plan and where such an approach can be considered to be in general conformity with the London Plan.</p> <p><b>COMMENTS ON DRAFT SITE ALLOCATION 29: HOMEBASE, MANOR ROAD, NORTH SHEEN</b></p> <p>The Developers strongly support the proposed allocation of the Site for development and welcome the recognition that the Site is suitable for a substantial provision of new housing units. However, the site-specific policy should be strengthened to support the design-led optimisation of the site to allow the optimum number of homes and affordable homes to be delivered on site.</p> <p>We consider these matters below, alongside identifying issues of soundness with regards to the plan being positively prepared, justified, effective; consistent with national policy and in general conformity with the London Plan.</p> <p><b>Building Heights</b></p> <p>The draft site allocation notes that “<i>The Urban Design Study identified part of the site as a tall building zone (7-8 storeys) with a mid-rise buffer zone (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones. It is recognised that there is currently a planning application with the Mayor which proposes heights up to 11 storeys. However, the Urban Design Study recommends the appropriate heights for the zone are up to 8 storeys to respect the small scale of the surrounding area.</i>”</p> <p>The draft site allocation also sets out a requirement for the height of the built form to increase towards the middle of the site and step down to the boundary.</p> <p><b>Urban Design Study (2023)</b></p> <p>The Developers support the underlying objective of the Urban Design Study (“UDS”) insofar that the identification of locations suitable for tall buildings, and where the local planning authority will support tall buildings, is in conformity with the regional strategic policy set out in Policy D9 of the London Plan (2021). However, the Developers disagree with the conclusions in the UDS in relation to the maximum suitable heights, particularly noting that sub-area F3, where the Site is located, is one of a few sub-areas considered to be of low sensitivity.</p> <p>The UDS notes that there is a need to create a sense of place and identity in the North Sheen Residential Character Area and that the “<i>existing townscape features do not relate to each other well and there is little overarching character</i>”. The character area strategy is therefore to <i>improve</i> the area through high quality new developments, enhancing sense of place and local distinctiveness and improving the public realm.</p> <p>The UDS identifies a number of ‘negative qualities’ for the North Sheen Residential Area, including the visual impact of the apartment block towers on the skyline and that this is unsympathetic to the wider two-storey architecture. The UDS does not identify why or how the impact of the ‘block towers’ on the skyline is negative and therefore fails to justify its consideration as a negative quality. Additionally, the sub-area in which the tower sits is characterised by a range of building heights. Exacerbating this, and as noted as a negative quality in the UDS, is the fragmented urban grain which makes the townscape less coherent. There is no strong sense of place or an established character and form of development. It is unclear how, in this context, the skyline impact of the apartment block is a negative quality.</p> <p>Sub-area A of the North Sheen Residential Area is considered to have “<i>lower sensitivity</i>” owing to the fragmented urban grain and presence of detracting features. The Developers strongly support the recognition of the sub-area as having low sensitivity to change. To note, this is one of very few sub-areas across the LBRuT identified to have low sensitivity in the UDS. In accordance with the principles set out in the NPPF and policy D3 of the London Plan, the Site is best placed to deliver a significant contribution to LBRuT’s housing and affordable housing stock and should be optimised.</p>	
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					<p>The limitation of heights to a maximum of 7-8 storeys is considered to significantly prohibit the effective optimisation of the Site and the delivery of a significant number of homes, including affordable homes, particularly as the height constraint is not adequately evidenced (discussed below).</p> <p><u>Tall Building Zone and Height on Homebase, Manor Road</u></p> <p>The UDS includes the identification of ‘Tall Building Zones’ and ‘Mid-rise Building Zones’ said to have been informed by the identified constraints and opportunities in the preceding sections of the Study. Whilst the Developer strongly supports the allocation of the Site as falling within these zones, we cast doubt on the ability of the UDS as a key evidence base underpinning the plan to justify the policies.</p> <p>On page 318, the UDS defines tall buildings as “7 storeys or over, or 21 metres or more from street level to the top of the building, whichever is lower”. The UDS does not provide adequate justification as to why this definition would be appropriate to the context. We would also note that the definition is not in general conformity with the London Plan, which requires definitions of tall buildings to be set for specific localities. The approach to adopt a single tall building definition across the LBRuT is not sufficiently granular to be considered positively prepared, and does not take an evidence-based justified approach to the drafting of policy.</p> <p>We would note that the Mayor has resolved to grant consent for a planning application comprising the delivery of buildings up to 11-storeys on this Site. The Townscape and Visual Impact Assessment (“TVIA”) (included at <b>Appendix I</b>) [See Appendix 5 to this schedule] submitted in support of this application demonstrated that the scale of the development sits comfortably at the Site in relation to its surroundings and local context. Specifically, the Greater London Authority (the “GLA”) in their Hearing Report of July 2020 (included at <b>Appendix II</b>) See Appendix 5 to this schedule] have noted that the proposed building heights and massing provide a clear visual hierarchy and agreed with the conclusions of the TVIA, which finds that the proposal would result in neutral or minor to moderate beneficial impacts on a number of views.</p> <p>In strong contrast to this, the UDS fails to test any heights or zones of theoretical visibility for the Site (as has been undertaken for other proposed Site Allocations). Instead, it relies on the scenario testing of the Sainsbury’s site to the north-east of the Site to conclude 7-8 storeys as the appropriate maximum heights. There is no justification provided as to why this approach is acceptable. We consider the approach to be fundamentally flawed as it fails to tailor to the Site thereby disregarding site-specific circumstances such as level changes, the boundary with the railway line and the manner in which the built form in proximity to the Site would alleviate and interact with massing at the Site. The maximum building height threshold of 7-8 storeys at the Site has therefore not been justified, contrary to the requirements of paragraph 35 of the NPPF.</p> <p>In addition to the above, the massing model tested for the Sainsbury’s site fails to account for reasonable assumptions attached to residential development, including the provision of communal amenity areas and site permeability. As such, the massing model tested assumes extensive site coverage that would have limited opportunities for meaningful contribution to the quality and sense of place. Subsequently, the theoretical visibility zone identified is excessive and does not respond to the reality of achievable development.</p> <p>Finally, only one massing model has been tested and there has been no exploration of how additional height or variations in massing would affect theoretical visibility. This is prudent to informing how an area of low sensitivity, such as the Site, can be optimised to maximise much needed housing delivery in the LBRuT. An evidence-based approach, including testing of various heights, should be taken to inform the optimal heights achievable in these locations.</p> <p><u>Stag Brewery (Draft Site Allocation 35)</u></p> <p>Draft Site Allocation 35 places the Stag Brewery within the H1 Mortlake Riverside Character Area. The UDS identifies the sensitivities of the surrounding context, particularly heritage and consistent typologies, and subsequently notes that these characteristics limit the ability of the character area to accommodate tall buildings. The UDS concludes that the character area has a high sensitivity to change.</p> <p>Notwithstanding the conclusions of the UDS, the draft site allocation goes on to note that <i>“There is potential in the tall building zone (7 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45. Tall and Mid-Rise Building Zones, noting that the Urban Design Study recognises the limits due to the sensitivities of the surrounding context.”</i></p> <p>There is no justification provided for why a character area H1, which is considered highly sensitive to change, is able to accommodate the same maximum height thresholds as character area F3, which is considered to have a low sensitivity to change.</p> <p>We would further note that the Stag Brewery site is the subject of planning applications (Ref. 22/0900/OUT and 22/0902/FUL) comprising buildings of up to 9 storeys. This application will be presented to the LBRuT Planning Committee on the 19<sup>th</sup> of July with an Officer’s recommendation for approval.</p> <p>The Officer’s report notes that: <i>“Whilst the site is within a tall building zone, the heights exceed the parameters of the Brief and Urban Design Study 2023, and do not meet elements of policy D9 of the London Plan. Notwithstanding such, on balance this is acceptable, with additional height mainly centrally located, scaling down to the perimeters, achieving a suitable relationship with the adjacent townscape and allowing the Maltings to remain a landmark building, albeit its prominence weakened, and the bottling plant and hotel to remain dominant visual features in the streetscape.” [our emphasis]</i></p> <p>We consider the assessment undertaken by Officers demonstrates the deficits of the UDS and prescriptive height constraints contained within the draft site allocations and draft policy 45. It demonstrates that, through detailed design and refined massing, scale beyond the recommendations of the draft site allocations and draft policy 45 is achievable.</p>	
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						As such, the UDS is not a sound evidence base to underpin policy, and greater flexibility to take a design-led approach to determining building heights should be written into the Local Plan. <u>Conclusion</u> In its current form, the Urban Design Study (2023) is not adequate or proportionate, nor does it justify the proposed height limit of 7-8 storeys at the Site and the approach to building heights for the Site. In the absence of any evidence to the contrary, it is requested that the TVIA provided at Appendix I is therefore taken into account in determining maximum appropriate heights for the site, as it has been clearly demonstrated that heights up to 11 storeys are acceptable. Furthermore, inadequate justification is provided for the definition of tall buildings across the LBRuT, particularly noting areas of low sensitivity that could be further optimised. As such, Site Allocation 29 and policy 45 (Tall and Mid-rise Building Zones) cannot be considered to be sound as they have not been justified and rely on an inadequate evidence base.							
264	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	Site Allocation 29 Homebase, Manor Road, North Sheen				[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 609... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 609 in relation to this Site Allocation]							
-						<b>Site Allocation 30: Sainsburys, Lower Richmond Road, Richmond</b>							
265	Richard Carr, <b>Transport for London (TfL)</b>	Site Allocation 30 Sainsburys, Lower Richmond Road, Richmond				<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Site Allocation 29 [now Site Allocation 30]: Sainsbury's, Lower Richmond Road, Richmond</td> <td>The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.</td> <td>The first point of the vision now states that 'Any redevelopment proposal will be required to retain and/or re-provide the existing retail floorspace; associated car parking provision is expected to be re-provided in line with London Plan standards.' Although we welcome the reference to London Plan standards, the London Plan requires retail development in PTAL 5 to be car free and so an expectation that associated car parking should be re-provided is inappropriate., particularly in light of London Plan Policy T6 which states that 'Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.' The London Plan standard of car free development should be made clearer in the wording. We welcome the reference to engagement with TfL to ensure development does not lead to unacceptable impacts on the local road network</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Site Allocation 29 [now Site Allocation 30]: Sainsbury's, Lower Richmond Road, Richmond	The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.	The first point of the vision now states that 'Any redevelopment proposal will be required to retain and/or re-provide the existing retail floorspace; associated car parking provision is expected to be re-provided in line with London Plan standards.' Although we welcome the reference to London Plan standards, the London Plan requires retail development in PTAL 5 to be car free and so an expectation that associated car parking should be re-provided is inappropriate., particularly in light of London Plan Policy T6 which states that 'Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.' The London Plan standard of car free development should be made clearer in the wording. We welcome the reference to engagement with TfL to ensure development does not lead to unacceptable impacts on the local road network	
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266	Anna Stott (WSP), <b>Sainsburys Supermarkets Ltd</b>	Site Allocation 30 Sainsburys, Lower Richmond Road, Richmond	No	Justified; Consistent with national policy	<b>Draft Site Allocation 30 - Sainsburys, Lower Richmond Road, Richmond</b> Our previous Regulation 18 representations stated that the draft allocation should include a requirement to provide adequate car parking provision and servicing areas. We are pleased to see that the Regulation 19 draft includes a requirement to provide adequate car parking in line with London Plan standards. However, we reiterate that the site allocation should state the need to provide adequate servicing areas and operational land as well. This is to ensure that future commercial uses on site can operate efficiently and without impediment. In summary, it is vitally important that the draft allocation is updated to include a requirement to provide adequate servicing areas.	Allocation 30 – include reference to provision of adequate servicing areas and operational land.							
267	Craig Hatton, <b>Network Rail (Southern)</b>	Site Allocation 30 Sainsburys, Lower Richmond			Network Rail supports the allocation of the site however, as with site allocation 29 above, there remains the opportunity to capture contributions from this re-development to improve access to North Sheen station for all, including those with mobility issues.	The allocation should be amended to include reference to securing 'developer and third-party contributions towards improving identified factors that impact access to and around the station for all users'. Additionally, as above, reference should be made within this allocation to							

		Road, Richmond								the level crossing and the potential to secure any further safety mitigations that may be required for this, because of development.
268	David Wilson, <b>Thames Water</b>	Site Allocation 30 Sainsburys, Lower Richmond Road, Richmond								Thames Water <b>Site ID</b> 54334 (Reviewed Jan18) <b>Water Response:</b> The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a> . <b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ <b>Additional Comments:</b> With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water and aim for greenfield runoff rates we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.
269	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	Site Allocation 30 Sainsburys, Lower Richmond Road, Richmond								[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 616... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 616 in relation to this Site Allocation]
-										<b>Place-based Strategy for Kew</b>
270	Julie Scurr	Place-based Strategy for Kew								<b>Kew:</b> there is a massive increase in the population planned for Kew/North Sheen, far out of proportion to its current population, but there is no commitment for increased, visible, policing which has got to be an absolute necessity.
-	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), <b>St George plc and Marks and Spencer</b>	Building Heights – Site Allocation 31 (Kew Retail Park), Place Based Strategy for Kew and Policy 45	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy				[See comment 508 on Building Heights – Site Allocation 31 (Kew Retail Park), Place Based Strategy for Kew and Policy 45]
271	Craig Hatton, <b>Network Rail (Southern)</b>	Place-based strategy for Kew								Network Rail supports this strategy for Kew especially in maintaining and enhancing the retail offer around Kew Gardens station as well as wayfinding at the station and promoting active travel.
272	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	Place-based strategy for Kew								[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 618, 619... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 618 in relation to the boundaries of the place-based strategy for Kew and comment 619 in relation to Old Deer Park]
273	Peter Willan and Paul Velluet, <b>Old Deer Park</b>	Place-based Strategy for Kew (in relation to								[See comment 21] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: 620...



	<b>Working Group</b>	Old Deer Park)					[See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 620 in relation to Old Deer Park]							
-							<b>Site Allocation 31: Kew Retail Park, Bessant Drive, Kew</b>							
274	Chris Toop	Site Allocation 31 Kew Retail Park, Bessant Drive, Kew		No		Positively Prepared	I object strongly to the inclusion of Kew Retail Park and the Homebase site, as locations for major developments. This is contrary to the wishes of the vast majority of residents and yet makes planning approval so much easier for would be developers.							
275	Tim Brennan, <b>Historic England</b>	Site Allocation 31 Kew Retail Park, Bessant Drive, Kew					SA 31 – Kew Retail Park We note that the policy refers to the Urban Design Study in indicating that part of the site as a tall building zone. As with our comments in relation to policy 45, we consider the site allocation policy to be somewhat ambiguous in this regard, as it is not clear how the tall building location has been decided upon or what is the justification for its siting. We would assume that this is to avoid impacts on heritage assets and/or townscape character but making explicit the link to the evidence and logic for this would be helpful. Further text to ensure it is clear what proposals should take into account is also necessary. We would support the development of a masterplan for the site, and would be very pleased to be involved.							
276	Richard Carr, <b>Transport for London (TfL)</b>	Site Allocation 31 Kew Retail Park, Bessant Drive, Kew					<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Site Allocation 30 [now Site Allocation 31]: Kew Retail Park, Bessant Drive, Kew</td> <td>The site is adjacent to the Transport for London Road Network (TLRN). We therefore welcome the statement that <i>'The applicant is strongly advised to seek pre-application transport and highway safety advice from Borough and TfL Officers before writing their transport assessment.'</i></td> <td>The PTAL for a large part of the site is 2 including the main access points and frontage, so we would expect this to be used as the baseline rather than the stated PTAL of 0 which is influenced by the lack of access to the rear of the site. We welcome confirmation that 'Car parking provision is expected to be in line with London Plan standards'</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Site Allocation 30 [now Site Allocation 31]: Kew Retail Park, Bessant Drive, Kew	The site is adjacent to the Transport for London Road Network (TLRN). We therefore welcome the statement that <i>'The applicant is strongly advised to seek pre-application transport and highway safety advice from Borough and TfL Officers before writing their transport assessment.'</i>	The PTAL for a large part of the site is 2 including the main access points and frontage, so we would expect this to be used as the baseline rather than the stated PTAL of 0 which is influenced by the lack of access to the rear of the site. We welcome confirmation that 'Car parking provision is expected to be in line with London Plan standards'	
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277	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), <b>St George plc and Marks and Spencer</b>	Site Allocation 31 Kew Retail Park - introduction, retail matters	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<p><b>Introduction</b></p> <p>These representations have been prepared by Avison Young (with input from Montagu Evans, and Energist) jointly on behalf of St George Plc (SG) and Marks and Spencer (M&amp;S), who are the owners of the Kew Retail Park (KRP) site (referred to as the 'Landowners' from hereon).</p> <p>SG and M&amp;S made previous representations on the Pre-Publication Regulation 18 draft Local Plan in January 2022 and whilst the proposed allocation of KRP for development was supported, comments were provided on the Regulation 18 evidence base, in addition to the Place Based Strategy for Kew, Site Allocation 30 (Kew Retail Park) and a number of policies. A copy of our January 2022 Regulation 18 draft Local Plan representations can be found at Appendix A. [See Appendix 6]</p> <p>The Landowners continue to support the proposed allocation of the KRP site for redevelopment. The principle of redeveloping the site is firmly aligned with the objectives of national and London Plan policy (particularly Policies H1, E9 and SD7) and it represents a fantastic opportunity to bring forward something truly special for the borough.</p> <p>We are keen to continue to work collaboratively with the Council, the local community, and other stakeholders to prepare a planning application for the redevelopment of the site over the course of 2023/2024 and to deliver that scheme as soon as possible.</p> <p>Key to this is ensuring that the new local plan includes an appropriately supportive site-specific policy to act as the basis for the determination of the future planning application, and to ensure that the content of the plan as a whole is sound.</p> <p>The purpose of our Regulation 19 representation is to make further recommendations on how the site-specific policy could be strengthened and to helpfully identify where we consider there to be soundness issues with the current draft, with regards to the plan being: positively prepared; justified; effective; and consistent with national policy (and in general conformity with the London Plan). In each instance we explain the issue and propose amendments or other solutions to resolve it to ensure that the plan is progressed on a sound basis.</p> <p>Our representations focus primarily on the following Regulation 19 draft policies and associated supporting evidence base documents:</p> <ul style="list-style-type: none"> <li>- Building Heights - Site Allocation 31(Kew Retail Park), Place Based Strategy for Kew and Policy 45 (Section 2) [See comment 508]</li> <li>- Site Allocation 31 (Kew Retail Park) – Retail Matters (Section 3)</li> <li>- Affordable Housing &amp; Whole Plan Viability – Policy 11 (Section 4) [See comment 365]</li> <li>- Policies 4 (Minimising Greenhouse Gas emissions), 6 (Sustainable Construction Standards), 18 (Development in Centres), 29 (Designated Heritage Assets), 30 (Non-Designated Heritage Assets) and 31 (Views and Vistas) (Section 5) [See comments 320, 327, 392, 430, 436 and 439]</li> </ul> <p>Furthermore, we continue to have concerns regarding the soundness of Policies 10, 12, 13, 17, 18, 28, 38, and 45. These concerns are as set out in our representations made at the Regulation 18 stage (which have not been fully addressed in the Regulation 19 draft). We have therefore 're-submitted' these comments which should be treated as forming part of our representations to the Regulation 19 draft (enclosed at Appendix A). [See Appendix 6]</p>							

				<p>SG and M&amp;S request to participate in the examination hearing sessions with respect to relevant policies set out in these draft Local Plan representations (including the policies covered in Appendix A).</p> <p><b>Retail Matters – Site Allocation 31</b>  <b>Context (Regulation 18 Representations)</b>  The Regulation 18 draft of the Local Plan included a site allocation (30) for Kew Retail Park, which stated the following: ‘any new convenience retail provision should not exceed the floorspace of the existing units, to protect the existing main centre in Kew’.</p> <p>AY submitted representations setting out reasons why such a restriction would not be sound. In summary, the reasoning for this is as follows (please refer to our full representation at Appendix A):</p> <ul style="list-style-type: none"> <li>- There is a qualitative need to improve convenience retail provision in Kew suitable for a main food shop (as opposed to just top-up shopping) in order to ensure access to food shopping as necessary to achieve the living locally/20-minute neighbourhood principles of Policy 1. This is in the context that existing/future residents in much of Kew do not live within 20-minutes’ walk of a supermarket that is capable of meeting a ‘main food’ shop need;</li> <li>- The provision of an improved convenience retail offer (minimum 25,000sqft GIA) as part of a replacement M&amp;S is required to make the Site available for development;</li> <li>- It would not be in general conformity with the London Plan SD7 (which is in place to encourage the redevelopment of out-of-centre retail parks for housing intensification), which does not impose any policy restrictions over what type of goods replacement retail floorspace can be used for (it defers to national policy (impact and sequential tests) to manage this in line with normal practice);</li> <li>- The Council’s Retail Study Part 1 does not provide justification for a restriction on the amount of convenience retail floorspace at the Site; and</li> <li>- Policies should be positively worded.</li> </ul> <p>The points raised in our Regulation 18 representations (as summarised above) still stand, and form part of our representations to the Regulation 19 consultation. To avoid repetition we do not repeat them in full here – please refer to Section 5 of Appendix A of this submission (specifically paragraphs 5.2-5.13 and 5.17-5.36).</p> <p><b>Regulation 19 Representations</b>  We have reviewed the Regulation 19 draft and are concerned that the restriction on convenience retail provision has been maintained. Site allocation 31 (Kew Retail Park) states: ‘any new convenience retail provision should not exceed the floorspace of the existing units, to protect the existing main centre in Kew’.</p> <p>This is a negatively worded policy and therefore is <b>not positively prepared</b>. It is <b>not consistent with national policy</b>, in particular with the sequential and impact policy tests which are the well-established policy mechanisms in place to control out-of-centre retail development proposals. It is not justified by the Council’s Retail Assessment (Part 1 nor Part 2). Finally, it is <b>not effective</b> as it will render the KRP site allocation undeliverable owing to the commercial tests that M&amp;S need to achieve if they are to make the site available for development.</p> <p>We have identified two ways in which the policy can be amended to make it sound, which we set out as tracked changes below:</p> <p><u>Option 1 – As per Regulation 18 Representations</u></p> <div data-bbox="804 1234 1733 1602" data-label="Text" style="border: 1px solid black; padding: 5px;"> <p>Whilst the site is not located within a main or local centre, it is an established retail destination and it has for many years proved to be a popular retail destination, location for the residents of Kew. It is expected that a substantial element of retail development, commercial uses will be retained/replaced on site. Opportunities to improve convenience goods retail provision (in order to be suitable to meet ‘main food shop’ needs) will be supported in order to contribute towards achieving the 20-minute neighbourhood objectives of Policy 1. The overall mix of uses, which could include other minor/small scale complementary town centre uses, such as retail, cafes and offices, should be curated so that they add to the vibrancy and vitality of the new community. The proposed office provision should provide affordable workspace for small and medium-sized companies. While the Sequential and Impact Test requirements of Policy 18 will need to be satisfied at the planning application stage, the requirements to satisfy both tests will be limited in scale and complexity bearing in mind the in-principle acceptability of providing substantial replacement retail floorspace on the site. Proposals that satisfy the Sequential Test and do not have a significant adverse impact on the borough’s town centres will be supported. Any new convenience retail provision should not exceed the floorspace of the existing units, to protect the existing local centre in Kew.</p> </div> <p><u>Option 2 – Defer to National Policy/Policy 18</u></p> <div data-bbox="804 1650 1733 1892" data-label="Text" style="border: 1px solid black; padding: 5px;"> <p>Whilst the site is not located within a main or local centre, it is an established retail destination it has for many years proved to be a popular retail destination shopping location for the residents of Kew. It is expected that commercial uses will be retained in site. The mix of uses, such as retail, cafes and offices, should be curated so that they add to the vibrancy and vitality of the new community. The proposed office provision should provide affordable workspace for small and medium-sized companies. Any new convenience retail provision should not exceed the floorspace of the existing units, to protect the existing local centre in Kew. In accordance with national policy, any new retail provision should satisfy the Sequential Test and will require an Impact Assessment where it exceeds the scale thresholds set out in Policy 18(g).</p> </div>	
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We explain and justify our position below.

**Site Availability**

The availability of the KRP site for redevelopment is dependent on the provision of substantial replacement retail floorspace (a replacement M&S store).

**Consistency**

We note that the convenience goods floorspace restriction included in the KRP site allocation is not proposed on any other out-of-centre allocation sites. There is no clear justification for this inconsistency.

**Need**

At the heart of planning system is the presumption in favour of sustainable development, which requires local plans to include policies that provide for **objectively assessed needs** unless ..... any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework taken as a whole. Accordingly the matter of **need** is leading consideration in reaching a view on the soundness of the plan. Paragraph 4.35 of the Richmond-upon-Thames Retail and Leisure Study Phase 2 (2023) (referred to as the '2023 Study' from hereon), states that residents across the LBRuT have good access to a range and choice of food stores and there are no obvious areas of deficiency in food store provision. **We do not agree with this.**

As per our Regulation 18 representations, **we consider there to be a need to improve convenience goods retail provision in Kew in order that this is suitable to meet main food shop needs (as opposed to just top-up shopping) in order to meet objectively assessed needs and to achieve the living locally/20-minute neighbourhood principles of Policy 1, which is at the heart of the local plan.**

**Existing Stores**

Policy 1 states that the 'living locally' concept will be achieved by giving people the ability to meet most of their daily needs, through a mixed pattern of land uses **including food and necessities**, within a **20-minute walk** from home, with safe cycling and local public transport options. It is our understanding that the 20-minute measurement is round-trip (so 10-minutes each way).

As demonstrated in Map 4.1 of the Regulation 19 draft Local Plan, most of the borough is within 800 metres (as the crow flies) (generally regarded as 10-minutes' walk) of a centre or shopping parade, including much of Kew. However, on closer investigation it is clear that **existing (and future) residents in much of Kew (including the KRP site) do not live within 800 metres of a supermarket that is capable of meeting a 'main' food shop need.**

Details of the closest supermarkets to the KRP site are set out in Table 3.1 below (refer to walk-distance maps at Appendix A of our Regulation 18 Representations enclosed at Appendix A):

*Table 3.1 Existing Local Supermarket*

Store	Address	Town Centre	Suitable for a Main-Food Shop?	Distance from KRP Site	Walk-Time from KRP Site
M&S	Kew Retail Park	Out-of-Centre	No Top-up Only	-	-
Tesco Express	2-8 Station Parade, Kew, TW9 3PZ	Town Centre	No Top-up only	0.5 miles 0.8 km	11 minutes
Sainsbury's North Sheen	Lower Richmond Road, TW9 4LT	Out-of-Centre	Yes	1.2 miles 2 km	23 minutes
Waitrose	Upper Richmond Road, East Sheen, SW14 7JG	Town Centre	Yes	1.3 miles 2.1 km	28 minutes

**Current Shopping Patterns**

Richmond-upon-Thames Retail and Leisure Study Phase 2 (2023)

We have reviewed the Richmond-upon-Thames Retail and Leisure Study Phase 2 (2023) (referred to as the '2023 Study' from hereon), which uses the results of a household survey to model the shopping patterns of the borough's residents. For this purpose, the borough was broken down into 7 zones based on ward boundaries. Zone 6 comprises the wards of Kew and North Richmond (which includes the KRP site).

The 2023 Study indicates that the residents of Zone 6 generate £79.9m of convenience goods expenditure per annum (2022), of which:

- Only 23% is spent within Zone 6 itself. The 2023 Study does not include details of which destinations are included within Zone 6. The main food/grocery shopping destinations identified by AY are Tesco Express (Kew Gardens Local Centre), the out-of-centre Sainsbury's in North Sheen, and the out-of-centre M&S at Kew Retail Park.
- The remaining 77% is spent outside of the Zone:
  - o 56% is spent in Zone 1 (South Richmond and Ham, Petersham and Richmond Riverside wards). The main food/grocery shopping destinations within Zone 1 are Waitrose in Richmond Major Centre;
  - o 9% is spent in Zone 7 (Mortlake and Barnes Common, Barnes, and East Sheen wards). The main food/grocery shopping destination within Zone 7 is Waitrose within East Sheen District Centre;
  - o 4.6% is spent elsewhere in the borough; and
  - o 6.7% leaks out of the borough.

The above figures are for total convenience retail expenditure. The 2023 Study does not provide a breakdown between main and top-up expenditure.

						<p>We query the accuracy of the above, specifically in terms of the proportion of Zone 6 expenditure that is retained in Zone 6, noting that the Sainsbury's located on Lower Richmond Road, is located within Zone 6 (based on wards) which we would expect to attract a much greater market share. Conversely attributing 56% of Zone 6 convenience goods expenditure to destinations in Zone 1 appears high, noting that the only significant main food/grocery shopping destination in Zone 1 is Waitrose in Richmond Town Centre. Having regard to this, we query whether the Lower Richmond Road Sainsbury's may have been incorrectly included within Zone 1 rather than Zone 6.</p> <p>Regardless of the above query, what is clear from the 2023 Study is that <b>residents of North Kew are currently travelling to locations that are well in excess of 800m from their homes to undertake the majority of their food/grocery shopping</b>. It is reasonable to assume that this is because their shopping needs cannot be met by existing food/grocery destinations that are closer to home.</p> <p><u>Avison Young Assessment (2022)</u></p> <p>Avison Young commissioned NEMS to undertake its own household survey in 2022 in order to gain an understanding of shopping patterns in the borough to inform its own retail assessment (referred to as the AY Assessment from hereon). For the purposes of consistency it followed a similar methodology, and used similar base data and assumptions as the NEMS survey commissioned by the Council to inform the 2023 Study (including the extent of survey zones). The survey sample size of the AY Assessment was 1,002 people which we consider to be robust.</p> <p>Extracts from the survey report is enclosed at Appendix B. Table 3.2, below, sets out the results of questions asked to residents of Zone 6 (Kew/North Richmond wards) of where they buy food:</p> <p><i>Table 3.2 Convenience Goods Shopping Patterns (Zone 6 Residents)</i></p>	
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Question	Response (Zone 6 Residents)
Q.1 Where do you do most of your household's main food shopping?	<p>60% - Sainsbury's, Lower Richmond Road (Out-of-Centre)  9% - Waitrose, East Sheen (District Centre)  8% - Waitrose Richmond (Major Centre)  0% - Squires Food and Wine, Sandycornbe Road (Local Centre)  5% - M&amp;S Kew Retail Park (Out-of-Centre)  2% - Tesco Extra Twickenham (Out-of-Centre)  1% - Tesco Express, Kew Gardens (Local Centre)  9% - Other</p> <p><b>[67% out-of-centre/24% town centre]</b></p>
Q.2 Apart from the store/centre mentioned at (1), where else do you regularly do a main food shop	<p>16% - Waitrose Richmond (Major Centre)  16% - M&amp;S, Kew Retail Park (Out-of-Centre)  13% - Tesco Express, Kew Gardens (Local Centre)  12% - Tesco Extra, Morden Lane (Out-of-centre)  12% - Tesco Extra Twickenham (Out-of-Centre)  11% - Sainsbury's, Lower Richmond Road (Out-of-Centre)  9% - Richmond Town Centre (Major Centre)  8% - Waitrose, East Sheen (District Centre)  3% - Tesco Express, George Street, Richmond (Major Centre)</p> <p><b>[51% out-of-centre/49% town centre]</b></p>
Q.3 Where do you do most of your household's small scale 'top-up' food shopping	<p>21% - Tesco Express, Kew Gardens (Local Centre)  15% - Sainsbury's Superstore, Lower Richmond Road (Out-of-Centre)  13% - M&amp;S Foodhall, Kew Retail Park (Out-of-Centre)  9% - Waitrose Richmond (Major Centre)  8% - Waitrose, Upper Richmond Road West, East Sheen (District Centre)  6% - Lidl, New Road, Feltham (Out-of-Centre)  5% - Tesco Express, Kew Road (Local Centre)  5% - Squires Food and Wine, Sandycornbe Road (Local Centre)  4% - Kew Green (Local Centre)  3% - Kew Gardens (Local Centre)  2% - Lidl, South Road, Fulwell (Out-of-Centre)  2% - M&amp;S Simply Food, Chiswick High Road, Chiswick (District Centre)</p> <p><b>[36% out-of-centre/57% town centre]</b></p>
Q.4 Where else do you do most of your household's small scale top-up food shopping	<p>36% - M&amp;S, Kew Retail Park (Out-of-centre)  13% - Tesco Express, Kew Gardens (Local Centre)  12% - Lidl, Richmond Road, East Twickenham (Local Centre)  7% - Sainsbury's, Lower Richmond Road (Out-of-centre)  6% - Sainsbury's Local, Ealing Road, Brentford (Out-of-Centre)  5% - Waitrose Richmond (Major Centre)  3% - Kew Village Centre (retailers not specified) (Local Centre)  3% - M&amp;S George Street, Richmond (Major Centre)  3% - Aldi High Street, Feltham (Town Centre)  2% - Tesco, George Street, Richmond (Major Centre)  2% - Tesco Express, Kew Road (Local Centre)  1% - Waitrose, East Sheen (District Centre)  1% - Squires Food and Wine, Sandycornbe Road (Local Centre)  1% - Kew Green (retailers not specified) (Local Centre)</p> <p><b>[43% out-of-centre/52% town centre]</b></p>

As a starting point, the AY Assessment validates the findings of the 2023 Study that residents of Kew are currently travelling to town centres or out-of-centre supermarkets that are well in excess of 800m from their homes to undertake the majority of their food/grocery shopping.

However, the AY Assessment goes into a more granular level of detail. When main, alternative-main, and top-up expenditure of Zone 6 residents is combined, the AY Assessment estimates that the residents of Zone 6 generate £79.3m of convenience goods expenditure per annum (2022). This is based on an estimate population of 23,738 (source: Experian Location Analyst, Nov 2022) and per capita convenience expenditure of £3,341 (excluding non-store retail trade deduction) (source: Experian Retail Planner Briefing Note 19, January 2022). We note that this is not materially different to the 2023 Study's estimate. The AY Assessment assumes that 75% of expenditure comprises main shop, and 25% is top-up, this is then split between the first and second choices for each answer which provides a detailed assessment. The 2023 Study assumes a 70% / 30% split between main and top-up shopping and does not ask about any additional trips / locations.

The AY household survey results indicate that of total convenience goods expenditure generated by residents of Kew/North Richmond wards (Zone 6):

- 58.5% is spent within Zone 6 itself, of which:
  - o 9.1% is spent in town centres (numerous Local Centres, including Kew Gardens); and



					<ul style="list-style-type: none"> <li>o 49.4% is spent in out-of-centre locations (principally Sainsbury’s on Lower Richmond Road)</li> <li>- The remaining 41.5% is spent outside of the Zone: <ul style="list-style-type: none"> <li>o 12.6% is spent in Zone 1 (South Richmond and Ham, Petersham and Richmond Riverside wards), of which: <ul style="list-style-type: none"> <li>▪ 12.6% is spent in town centres (the main food/grocery shopping destination within Zone 1 is Waitrose in Richmond Major Centre); and</li> <li>▪ 0% is spent in out-of-centre locations</li> </ul> </li> <li>o 8.5% is spent in Zone 7 (Mortlake and Barnes Common, Barnes, and East Sheen wards), of which: <ul style="list-style-type: none"> <li>▪ 8.5% is spent in town centres (the main food/grocery shopping destination within Zone 7 is Waitrose in East Sheen District Centre); and</li> <li>▪ 0% is spent in out-of-centre locations</li> </ul> </li> <li>o 5.5% is spent elsewhere in the borough, of which: <ul style="list-style-type: none"> <li>▪ 1.9% is spent in town centres; and</li> <li>▪ 3.6% is spent in out-of-centre locations.</li> </ul> </li> <li>o 14.9% leaks out of the borough.</li> </ul> </li> </ul> <p><b>What is clear from this is that not only are residents of Kew currently travelling well in excess of 800m from their homes to do the majority of their food shopping, but the majority of this shopping is being done at out-of-centre locations (particularly for main food shopping). Kew Gardens Local Centre and the M&amp;S at KRP are both popular destinations for top-up convenience shopping but attract limited main food shop market share.</b></p> <p><b>Sustainable Travel</b>  With reference to the shopping patterns of residents of Zone 6 discussed above, we note that there are regular bus or rail services that connect Kew with the main food/grocery shopping destinations in Zone 6 and 1. The main food/grocery destination in Zone 7 is less accessible from Kew, requiring a change in bus/train. Nonetheless, paragraph 4.23 of the 2023 Study advises that the results of the household survey indicate that <b>most residents tend to undertake their main food shopping trips by car</b>. This indicates that in practice the existing distribution of main food shop destinations represents an unsustainable pattern of development, which contributes to road congestion and associated air quality issues.</p> <p><b>Overtrading</b>  The 2023 Study concludes that at a borough-wide level there is no quantitative need for additional convenience goods retail floorspace over the plan period, however recognises that a small scale need does arise within Zones 6 and 7 by 2034 (refer to Table 4.5).  This conclusion is based on modelling of household survey data to establish shopping patterns of the borough’s residents. The results are presented on a zone-by-zone basis and do not include any granular detail with regard to specific retailers, centres, or locations. As a consequence, the assessment assumes that all food/grocery shops are trading at equilibrium at the base year. It does not take into account the fact that some retailers may be over trading relative to company average turnover levels which would indicate that there is capacity for additional floorspace. Not taking into account existing trading patterns is unrealistic as a matter of principle.  Helpfully, the household survey commissioned to inform the AY Assessment has gone into more granular detail by gathering data on the specific retailer, centre, or location (as opposed to just the zone). The findings of the modelling of this data firmly indicate that <b>the food component of the M&amp;S at Kew Retail Park is trading at significantly over company benchmark turnover levels</b>. It is unable to provide an acceptable shopping experience as a consequence through overcrowding and congestion within the store and the inability to ensure a consistent level of stock on the shelves to meet customer expectations.  The findings of the household survey are consistent with observational evidence of overcrowding, queues, and challenges in keeping shelves well stocked on numerous visits to the store (by Avison Young), which has been validated by feedback from the local community at public consultation events in 2022 and M&amp;S itself.</p> <p><b>Town Centre Health</b>  The 2023 Study is accompanied by an Assessment of all Centres within the Borough which comprise an analysis of all centres to provide an indication of their overall health (in town centre vitality and viability terms).  The following details regarding Kew Gardens Local Centre are provided:  - It has 45 units, of which just 2 are vacant (4%); and  - Existing businesses provide 11 out of 16 types of shops, services and community uses that residents could expect to find some or most of within easy walking distance of their homes. On the basis of this index, Kew Gardens is ranked 7th best performing out of 35 local centres in the borough.  The assessment notes that <i>“the completion of the Kew Riverside scheme increased the amount of housing in the area considerably. Further significant housing development was completed at the Inland Revenue site in 2018 and permission has been granted for 88 additional units at the Kew Biothane site nearby in 2020.”</i> The assessment makes it clear that Kew Gardens Local Centre is increasingly catering for a growing residential population in addition to tourists, including those visiting Kew Gardens (which we note are likely to be a significant driver of trade), and is healthy (in town centre vitality and viability terms). This has been verified by Avison Young on numerous visits.  As a healthy centre it is reasonable to conclude that it would have a greater degree of resilience to potential impacts of new retail development at a competing destination, than would be the case for a less healthy centre.  There is nothing contained within the health check to indicate that the addition of further convenience goods retail floorspace at KRP (or elsewhere in Kew) suitable for a main food shop would divert sufficient trade to have a significant</p>	
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						<p>adverse impact on the vitality and viability of Kew Gardens Local Centre. As discussed earlier, the centre's existing convenience goods retailers are mainly satisfying top-up convenience shopping needs, and therefore would not be direct competition with a new main-food shop destination should this be brought forward in the local area. The findings of the 2023 Study demonstrates that <b>Kew Gardens Local centre is demonstrably healthy and therefore resilient to potential impacts of competing development elsewhere. There is no evidence to suggest that it requires greater protection over and above that already provided by established national sequential and impact policy tests (as covered by Policy 18).</b></p> <p><b>Summary</b></p> <p>The availability of the KRP site for redevelopment is dependent on the provision of substantial replacement retail floorspace (a replacement M&amp;S store), to include an enhanced foodhall offer.</p> <p>The evidence that we have set out above firmly indicates that there is a need to improve convenience goods retail provision in Kew to ensure that this is suitable to meet main food shop needs (as opposed to just top-up shopping). This is necessary to meet objectively assessed needs and to achieve the living locally/20-minute neighbourhood principles of Policy 1, which is at the heart of the local plan. In summary, the principal reasons for this are:</p> <ul style="list-style-type: none"> <li>- Existing (and future) residents in much of Kew (including the KRP site) do not live within 800 metres of a supermarket that is capable of meeting a 'main' food shop need.</li> <li>- Accordingly, residents of Kew are currently travelling to locations that are well in excess of 800m from their homes to undertake the majority of their food/grocery shopping (an unnecessary need to travel).</li> <li>- The majority of food shopping undertaken by residents of Kew is being done at out-of-centre locations.</li> <li>- Most residents of the borough tend to undertake their main food shopping trips by car, which contributes to congestion and air quality issues.</li> <li>- Kew Gardens is a popular destination for top-up convenience shopping but attracts less than 4% of the main food market share.</li> <li>- The food component of the M&amp;S at Kew Retail Park is trading at significantly over company benchmark turnover levels.</li> </ul> <p>Finally, Kew Local Centre is demonstrably healthy (and therefore resilient to potential impacts of competing development elsewhere) . There is no evidence to suggest that it requires greater protection over and above that already provided by established national sequential and impact policy tests (as covered by Policy 18). [See comment 508 in relation to Building Heights - Site Allocation 31 (Kew Retail Park), Place Based Strategy for Kew and Policy 45]</p>	
278	David Wilson, <b>Thames Water</b>	Site Allocation 31 Kew Retail Park, Bessant Drive, Kew				<p>Thames Water <b>Site ID 75278</b></p> <p><b>Water Response:</b> The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p><b>Waste Response:</b> The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p>	
279	Rachel Holmes, <b>Environment Agency</b>	Site Allocation 31 Kew Retail Park, Bessant Drive, Kew				<p><b>Site allocation 31 – Mellis Avenue, Kew [note this Site Allocation is called Kew Retail Park, Bessant Drive, Kew]</b></p> <p>We understand that the site allocations must be in line with other policies in the Local Plan and therefore that it is not necessary to reiterate these requirements within the site allocation.</p>	
-						<p><b>Site Allocation 32: Kew Biothane Plant, Melliss Avenue, Kew</b></p>	
280	Rachel Holmes, <b>Environment Agency</b>	Site Allocation 32 Kew Biothane Plant, Melliss Avenue, Kew				<p><b>Site Allocation 32 - Kew Biothane Plant, Melliss Avenue, Kew</b></p> <p>This site has been identified as a key opportunity for Water Framework Directive (WFD) improvement by way of managed realignment of the flood defence. Actions required to deliver such an improvement involve intertidal terracing between Kew Bridge and Chiswick Bridge (left bank). Terracing achieved by setting back within the footprint of the defence and using structurally engineered design.</p> <p>This will provide improvement to WFD status by enhancing condition of channel/bed and/or banks/shoreline, providing benefits to biodiversity and the geomorphology of the river. We would recommend that any development at this site comes with the expectation of carrying out such an intertidal enhancement.</p>	

281	David Wilson, <b>Thames Water</b>	Site Allocation 32 Kew Biothane Plant, Melliss Avenue, Kew						Thames Water <b>Site ID 49790</b> (APPROVED - 16/09/20) <b>Water Response:</b> On the information available to date we do not envisage concerns regarding water treatment capacity in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ <b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ <b>Additional Comments:</b> With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water and aim for greenfield runoff rates we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.	
282	Saffron Frost (Savills), <b>Melliss Ave Devco Limited (in Administration) c/o RSM</b>	Site Allocation 32 Kew Biothane Plant, Melliss Avenue, Kew	No	No	Yes	Justified; Effective	On behalf of our client Melliss Ave Devco Limited (in Administration) acting by its Joint Administrators, Savills have been instructed to submit a representation to the London Borough of Richmond Upon Thames Draft Local Plan: Regulation 19, in relation to Proposed Site Allocation 32: Kew Biothane Plant, Melliss Avenue, Kew. <b>Context</b> The site was given planning approval in 2018 for the Demolition of existing buildings and structures, and redevelopment of the site to provide a 4-6 storey specialist extra care facility for the elderly with existing health conditions, comprising of 88 units, communal healthcare, therapy, leisure, and social facilities (including a restaurant/bar/cafe and swimming pool). Provision of car and cycle parking, associated landscaping, and publicly accessible amenity space including a children's play area. In justifying the grant of planning permission, Council Officers needed to carefully consider two key matters (amongst others): the impact on Metropolitan Open Land and the form of housing proposed, which in this case was extra care housing. Please refer to the committee report. Regarding Metropolitan Open Land, the building approved in the 2018 permission partially encroached into MOL. The Council took the view that, due to its mass and height, the development would cause harm to the character, openness of MOL, and the area generally. The Council then acknowledged the significant benefits that would be delivered by this extra care development, and these need to be afforded significant weight. In this case, the package of benefits on offer constituted "very special circumstances" that justified the acceptability of development. As far as extra care housing, planning officers recognised in the 2018 permission that: (Committee Report para 9.36) <i>"Richmond has an ageing population with increasing levels of disability and frailty. The borough has the highest proportion of people aged over 75 and living alone in London and there are increasing numbers of older people living at home with long term physical and mental conditions such as dementia...."</i> (Committee Report para 9.37) <i>"The applicant's data highlights that the London Borough of Richmond upon Thames has the highest proportion of older people living alone in Greater London, with over 76% owning their own homes."</i> (Committee Report para 9.40) <i>"... while private extra care housing (particularly of this scale and without any mix of tenure) is not identified as a priority local housing need, the need to provide housing options for older people is recognised. The Local Plan recognises at para 8.3.9 in the supporting text to policy LP30 'Health and Wellbeing' that planning can play a role in the creation of environments and a public realm that are inclusive and accessible for the older population, including for those with dementia. The need to provide opportunities to enable older people to downsize is recognised in policy LP35 'Housing Mix and Standards'.</i>	<b>Modifications Sought</b> Within mind the planning context, including the Council's reasons for granting the 2018 permission, the fact that circumstances have not markedly shifted since 2018, as well as how the proposed site allocation vision relates directly to Local Plan policy, we suggest that the following changes are made to the Site's Vision: <b>Range of Housing</b> <i>The Council will support redevelopment of this site to provide for residential uses, including affordable housing, and associated open space provision.</i> <b>To</b> <i>The Council will support redevelopment of this site to provide for residential uses. This may comprise a range of housing to meet specific community needs, and includes affordable housing, and associated open space provision.</i> This change is needed so that the vision is consistent with Local Plan Policy 12 - Housing Needs of Different Groups Policy 12 Part – B states that "planning permission will be granted for new accommodation where housing is providing for an identified local need, across a range of tenures, providing they are on a site and in a location suitable for that particular use, and in accordance with environmental, transport, parking and other relevant policies." And in justification paragraph 17.44 <i>"The Council's identified priorities for new specialist housing development, at the time of writing, include: -Extra care and supported living provision including developing more specialist provision for service users with complex, high-level needs and challenging."</i> We are therefore of the view that the Site Vision needs to be adapted as per the above, so that a range of housing types that reflect community needs can come forward. <b>Metropolitan Open Land</b> <ul style="list-style-type: none"><li>Parts of the site are designated as MOL and development in this area would not be acceptable. There is an expectation that any redevelopment proposal improves the character and openness of the MOL.</li></ul> <b>To</b> <ul style="list-style-type: none"><li>Parts of the site are designated as MOL and development in this area would not be acceptable unless very special circumstances would outweigh harm to the Metropolitan Open Land.</li></ul> The vision of the site as written within the allocation goes beyond the council's own policy position for Metropolitan Open Land and is entirely unreasonable. We take this view from reviewing proposed Policy 35 - Green Belt, Metropolitan Open Land and Local Green Space. Policy 35 - Part A states the following : <i>The borough's Green Belt and Metropolitan Open Land will be protected and retained in predominantly open use. Inappropriate development will be refused unless 'very special circumstances' can be robustly demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land.</i> Policy 35 is therefore written to provide a degree of flexibility towards building on Metropolitan Open Land where 'very special circumstances' outweigh harm. However, the Site Vision is written so that it closes off 'very special circumstances' from being considered in the planning assessment. Therefore, should a future development be proposed that creates significant benefits, the decision maker would be unable to balance benefits against potential	

							harm. This is not reasonable and therefore the Site Vision should be corrected to align with Policy 35. The vision then goes to state – <i>There is an expectation that any redevelopment proposal improves the character and openness of the MOL.</i> Again, this is an unreasonable requirement that does align with Policy 35. Policy Part C, is written as follows: - <i>Very special circumstances’ must result in the improvement and enhancement of the openness, character and use of the Green Belt and Metropolitan Open Land. Measures could include improvements or enhancements to landscape quality (including visual amenity), biodiversity (including delivering biodiversity net gain) or accessibility.</i> As per the policy above, improvements to the character and openness of Open Space is only a requirement in situations where ‘very special circumstances’ apply. The Site Vision is therefore going beyond Policy 35 requirements and is unreasonable, because: a – it does not allow proposals even when ‘Very Special Circumstances’ apply (which we maintain is unreasonable). b – In addition, a development which does not trigger ‘Very Special Circumstances’ would still have an expectation according to the site vision to improve the character and openness of MOL. This is clearly unreasonable given that as per policy 35, improvements to the character and openness of MOL is only a requirement in a situation where ‘very special circumstances’ apply. The amendments to the Site Vision, as proposed above, are therefore needed to be consistent with Local Plan Policy 35 - Green Belt, Metropolitan Open Land and Local Green Space.
-							<b>Site Allocation 33: Pools on the Park and surroundings, Old Deer Park, Richmond</b>
283	David Wilson, <b>Thames Water</b>	Site Allocation 33 Pools on the Park and surroundings, Old Deer Park, Richmond					Thames Water <b>Site ID 75279</b> <b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority’s aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan. <b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority’s aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan. <b>Additional Comments:</b> To provide a more detailed response we will require information on the scale of development.
284	Peter Willan and Paul Velluet, <b>Old Deer Park Working Group</b>	Site Allocation 33 Pools on the Park and surroundings, Old Deer Park, Richmond					[See comment 21] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: 634... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 634 in relation to this Site Allocation]
-							<b>Site Allocation 34: Richmond Athletic Association Ground, Old Deer Park, Richmond</b>
285	David Wilson, <b>Thames Water</b>	Site Allocation 34 Richmond Athletic Association Ground, Old Deer Park, Richmond					Thames Water <b>Site ID 75281</b> <b>Water Response:</b> Due to the complexities of water networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the water infrastructure and its cumulative impact. To enable us to provide more specific comments on the site proposals we require details of the Local Authority’s aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet xxxxx to discuss the water infrastructure needs relating to the Local Plan. <b>Waste Response:</b> Due to the complexities of wastewater networks the level of information contained in this document does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on the wastewater infrastructure. To enable us to provide more specific comments on the site proposals we require details of the Local Authority’s aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development. Thames Water would welcome the opportunity to meet XXXXXX to discuss the wastewater infrastructure needs relating to the Local Plan. <b>Additional Comments:</b> To provide a more detailed response we will require information on the scale of development.
286	Jo Edwards, <b>Sport England</b>	Site Allocation 34 Richmond Athletic					support vision retention / improvement of playing field

		Association Ground, Old Deer Park, Richmond												
-						<b>Place-based Strategy for Mortlake &amp; East Sheen</b>								
287	Richard Carr, <b>Transport for London (TfL)</b>	Place Based Strategy for Mortlake and East Sheen Other Initiatives				<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Place Based Strategy for Mortlake and East Sheen Other Initiatives</td> <td>We note the reference to a potential cycle route between Mortlake and East Sheen in TfL’s Cycling Action Plan. This is indicative and more work will be required to determine the actual alignment of any cycle route.</td> <td></td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Place Based Strategy for Mortlake and East Sheen Other Initiatives	We note the reference to a potential cycle route between Mortlake and East Sheen in TfL’s Cycling Action Plan. This is indicative and more work will be required to determine the actual alignment of any cycle route.			
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288	Councillor Niki <b>Crookdake</b> , Green Party Councillor for Mortlake & Barnes Common	Place-based Strategy for Mortlake and East Sheen				<p><b>4. Section 13. Place Based Strategy for Mortlake &amp; East Sheen Pg 122-135</b></p> <p>Section 13 is included in pages 122-135 of the Local Plan. I attach the detailed comments on this section which I sent to the Spatial Planning and Design Team Manager on 4 April 2023 in the tables below. None of the comments were included in the draft which was approved by full council on 25 April.</p> <p>I received a reply on 18 April, in which she explained various Local Plan and Planning application processes and essentially stated that it was too late to give comments ‘no substantial comments or redrafting at this point’. As shown by the mark-up, most of my comments were correcting inaccuracies that related to the ward Mortlake &amp; Barnes Common. Given the planned development, around the locality, it was important that the plan accurately portrayed Mortlake &amp; Barnes Common before development began and acknowledged that it is already the largest ward, by population in the Borough and the second highest in terms of densities.</p> <p>I feel the officer’s decision not to include any of the points I raised was not justified, as required by NPPF policy 35b. I would ask if the Inspector can consider whether these comments should have been included.</p> <p><b>b. Reasons for the proposed amendments - 1</b></p> <p>The Urban Design study 2023 (updated from 2021) made these recommendations, however this is not true of the area surrounding Chalker’s Corner, which has a low PTAL rating of between 1-2. The area around Chalker’s Corner is not a ‘sustainable’ location and therefore, in line with NPPF policy 20(b). Strategic Policies should ‘set out an overall strategy .. and make sufficient provision for .. b) infrastructure for transport, telecommunications, security, waste management, water supply, ... c) community facilities (such as health, education..) etc.</p> <p>As stated above, no additional transport infrastructure has been planned (see below) to accommodate the cumulative impact of site allocations Homebase (29), Kew (31), STAG (35), and Barnes Hospital (38) amounting to at least 2,800 new homes and 6,000+ new people in the area together with a 1,200-pupil secondary school, a 90 pupil SEND school and Hospital.</p> <p><b>c. Relevant Policies and other evidence</b></p> <table border="1"> <tbody> <tr> <td><b>National Planning Policy (NPPF) Framework 2021 – Plan making and delivery</b></td> <td> <p><b>Preparing and reviewing plans</b></p> <p><b>31.</b> The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.</p> <p><b>32.</b> Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal .. wherever possible, <b>alternative options which reduce or eliminate such impacts should be pursued.</b></p> <p><b>Examining Plans</b></p> <p><b>35.</b> ...Plans are ‘sound’ if:</p> <p>a) <b>Positively prepared</b> – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs<sup>21</sup>; and is informed by agreements with other authorities</p> <p>b) <b>Justified</b> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) <b>Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters..</p> <p>d) <b>Consistent with national policy</b> – enabling the delivery of sustainable development ..</p> </td> </tr> <tr> <td><b>Local Plan Policy Introduction</b></td> <td><b>2.23 We cannot act in isolation</b> and therefore work hand in hand with communities and local partners ....</td> </tr> <tr> <td><b>Place based strategy</b></td> <td><b>Detailed comments on the place based strategy for Mortlake &amp; East Sheen section of the plan – sent on 4-4-23 – attached as a PDF</b> [See track changes in modifications considered necessary in this comment and comment 300 in relation to Site Allocation 35 and</td> </tr> </tbody> </table>	<b>National Planning Policy (NPPF) Framework 2021 – Plan making and delivery</b>	<p><b>Preparing and reviewing plans</b></p> <p><b>31.</b> The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.</p> <p><b>32.</b> Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal .. wherever possible, <b>alternative options which reduce or eliminate such impacts should be pursued.</b></p> <p><b>Examining Plans</b></p> <p><b>35.</b> ...Plans are ‘sound’ if:</p> <p>a) <b>Positively prepared</b> – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs<sup>21</sup>; and is informed by agreements with other authorities</p> <p>b) <b>Justified</b> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) <b>Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters..</p> <p>d) <b>Consistent with national policy</b> – enabling the delivery of sustainable development ..</p>	<b>Local Plan Policy Introduction</b>	<b>2.23 We cannot act in isolation</b> and therefore work hand in hand with communities and local partners ....	<b>Place based strategy</b>	<b>Detailed comments on the place based strategy for Mortlake &amp; East Sheen section of the plan – sent on 4-4-23 – attached as a PDF</b> [See track changes in modifications considered necessary in this comment and comment 300 in relation to Site Allocation 35 and	<p><b>a. Local Plan proposed amendments - 1</b></p> <p><b>‘Local Plan Policy 17.7</b></p> <p>17.7 The Urban Design Study 2021 has identified capacity for growth in the borough. The Council will encourage higher density development in more sustainable locations, such as main centres and areas better served by public transport, subject to compatibility with established character. Development should optimise site capacity through the design-led approach. This, along with local factors, such as proximity to facilities and to public transport routes, and the character of the surrounding area, will be taken into account in reaching the appropriate density for a particular site, see Policy 28 Local character and design quality, Policy 44 Design Process, and Policy 45 Tall and Mid-Rise Building Zones.’</p> <div style="border: 1px solid black; padding: 5px;"> <p><b>13 Place-based Strategy for Mortlake &amp; East Sheen</b></p> <p><b>Place-based Strategy for Mortlake &amp; East Sheen</b></p> <p><b>Area Profile</b></p> <p>The Mortlake &amp; East Sheen area encompasses East Sheen Town Centre, with East Sheen Residential and East Sheen Parkside, along with Mortlake Residential and Mortlake Riverside. These are character areas H1, H2, H3, H4 and H5 and in the Urban Design Study 2021.</p> <p>This area is predominantly residential, between the River Thames and Richmond Park. Towards Richmond Park there are attractive tree lined streets with large houses, whereas north of Upper Richmond Road West the character is formed by terraced cottages and houses.</p> <p>Across this area Sheen Common and Palewell Common provide unique open areas for a range of recreational activities and important wildlife habitats., <u>Although Mortlake has significant river frontage with the Varsity Boat Race traditionally ending near Chiswick bridge, there is currently little open green space. It is one of the most densely populated areas in the borough. The largest green spaces include the OOLTI designated field, currently part of the STAG Brewery site, running along the boundary with the Lower Richmond Road; Mortlake Green, adjacent to Mortlake Station; and Jubilee Gardens opposite Avondale and Ashleigh Road, along with Mortlake Common and the open space along the River between Chiswick Bridge and Barnes – with the Varsity Boat Race traditionally ending at Mortlake.</u></p> <p>The Mortlake Brewery is a prominent part of the area’s heritage. It is a significant development opportunity in the borough, since brewing operations ceased at the end of 2015. There are historic assets - the former bottling building, the Maltings building and the former hotel building, along with historic brick boundary structures that survive.</p> <p>The centre of East Sheen is bisected by Upper Richmond Road West (A205 South Circular) and inevitably this has a major impact on its appearance and character. Identified as a district centre in the borough’s centre hierarchy and the London Plan (see section 6 of the Plan), there is a mix of multiple and specialist shops, pubs, restaurants, cafes and a range of community facilities at the Sheen Lane Centre. The London Plan recognises existing office functions, generally within smaller units, should be protected, albeit that it has medium commercial growth potential.</p> <p>Mortlake now has limited shops and services on Mortlake High Street <u>which requires upgrading and improvement, by the addition of more shops, cafes, restaurants, and community facilities having been neglected over the past</u></p> </div>	
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					<p>comment 76 in relation to Site Allocation omission site Chertsey Court, Mortlake].</p>	<p><u>few decades, in anticipation of the regeneration on the STAG Brewery site.</u> There is currently is a neighbourhood centre at White Hart Lane. The area as a whole is <u>very congested, being squeezed between the river and the Richmond park. Vehicular traffic has been made worse by the closure of Hammersmith Bridge and Sheen Gate, Richmond Park. Chalker's Corner is currently the epicentre of a proposed further 3,000 new homes, from four developments, at Homebase, Kew Retail Park, STAG Brewery and Barnes Hospital. The STAG site has a PTAL rating of 1 at the Western corner. relatively well-connected, including Train services through Mortlake Station, have been reduced as have bus services running through Mortlake. although</u> The railway lines and level crossings also form <u>significant</u> barriers to movement <u>given the length of time they are down during the day.</u> – In line with the National, London, and Local Plan this requires development proposals to reduce the negative impact of development on the transport network and reduce potentially harmful public health impacts. To mitigate against the traffic and public transport issues in the area, will require a significant remodelling of the road, rail, active travel infrastructure to accommodate the increase in people and transport proposed in an already densely populated, heavily congested area.</p> <p>As part of the Urban Design Study consultation in 2021 on what local people valued in their area, Mortlake Residential (H2) received moderately high scores for attractiveness, green spaces, shops and restaurants and community spirit. <u>This reflected the lack of investment in this area over the past few decades in anticipation of the long-awaited STAG Brewery redevelopment.</u> The highest scores received for East Sheen Town Centre (H3) were for its shops and restaurants, green spaces, vibrancy and community spirit. East Sheen Residential (H4) received consistently high scores across most features. East Sheen Common and Residential (H5) received particularly high scores for its attractiveness <u>and</u> tranquillity, <u>given it is adjacent to Richmond Park, and shops and restaurants.</u></p> <p><b>Overall strategy</b></p> <p>Overall, the Urban Design Study 2021 sets out that Mortlake Riverside (H1) has a distinctive sense of place and heritage, with an overall high sensitivity to change, but its character risks being undermined by inconsistent building typologies, the dominating presence of the main road <u>i.e.</u>, Lower Richmond Road and Mortlake High Street, and its increasing disconnect from the Thames. For this area, the strategy aims to conserve and enhance the area's existing valued features and heritage assets, and to restore Mortlake's historical prominence and relationship with the Thames. Mortlake Residential (H2) has an overall high sensitivity to change, with the existing distinctive character and the coherent townscape, and the strategy is to conserve and enhance the character <u>by developing its community spirit by encouraging more shops, cafes and restaurants along Mortlake High Street and investing in Jubilee Gardens and public play spaces behind Mortlake High Street and adjacent to Mortlake Green.</u> East Sheen Town Centre (H3) is considered to have a fair sense of place and heritage with a high sensitivity to change overall, although the western part of the town centre has relatively lower sensitivity. It is recognised that the quality and functioning of the area as a town centre has been negatively impacted by several unsympathetic developments, the dominance of vehicle traffic along the South Circular, and the loss of coherence in shop frontages. The strategy is therefore to restore the historic character and improve its public realm and sense of identity, particularly along Upper Richmond Road to make it a more attractive destination. East Sheen Residential (H4) has a strong existing character and the townscape is well-maintained with a good quality of architecture, with a high sensitivity to change. The strategy is to conserve the character, elements, and features, whilst enhancing appropriate areas. East Sheen Parkside (H5) has a strong existing character and a high sensitivity to change. The strategy is to conserve the character, whilst enhancing particular features in order to strengthen the area's future resilience. The Urban Design Study contains design guidance for each character area and for Richmond borough's Riverside.</p> <p><b>Other initiatives</b></p>	
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							<p>improve pedestrian, cyclist and scooter experience in East Sheen Town Centre and <u>throughout at Mortlake Riverside and in particular at the busy junctions around Chalker's Corner and along the heavily congested Lower and Upper Richmond Roads, A316 and A205.</u></p> <p>There are site opportunities for new development in this area. Within the town centre boundary, there is some potential where the townscape is less intact for development to restore the historic character. The Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen (Site Allocation 36) is an opportunity - if the telephone exchange is declared surplus to requirements - for a <u>mixed-use mixed-use</u> scheme that contributes to the vitality and viability of the centre. Towards Mortlake High Street, there is a similar opportunity - if the Mortlake and Barnes Delivery Office, Mortlake (Site Allocation 35) becomes surplus - for employment or other commercial and retail uses.</p> <p>At Stag Brewery (Site Allocation 34) there is a significant opportunity to create a new quarter for living, with recreational and commercial uses to generate vibrancy, local employment, community and leisure opportunities. The redevelopment will create vibrant links between the River and the town, enlivening the Riverside frontage and Mortlake High Street, to transform Mortlake while respecting the character and history of the area. There is an opportunity to accommodate tall buildings within the sensitivities of the surrounding context, in accordance with Policy 45 Tall and Mid-Rise Building Zones.</p> <p><u>In addition, the current proposed repair of Hammersmith Bridge will result in a new permanent bridge available for re-siting elsewhere on the Thames once the repairs are completed. This 'green bridge' could provide a pedestrian, scooter, cyclist link between Dan Mason Drive on the North side of the Thames and Ship Lane on the South, steering non-vehicular traffic away from the polluted, busy A316 and onto the quieter, safer roads with the added benefit of linking the North and South towpaths, providing a green link onto and across the river from the Lower Richmond Road.</u></p> <p><u>There could also be an opportunity to include the Chertsey Court site, currently a large block of 170 flats in Lower Richmond Road as part of the Mortlake regeneration project (Site Allocation 34a). These flats are in poor condition needing inter alia new lifts, and that there could be potential for the residents in these flats to be accommodated either temporarily or permanently in the Brewery redevelopment while Chertsey Court is either renovated with energy-efficient infrastructure or else rebuilt elsewhere on the Brewery site, opening up the Chertsey Court site for alternate use.</u></p> <p><u>The benefits include the potential for a reconfiguration to allow space for a better junction between the A316, A205 at Chalker's Corner, perhaps incorporating a roundabout. This could also include improved conditions for buses, cyclists and pedestrians and help improve the current very low PTAL rating of 1.</u></p> <p><u>In addition, the Chertsey Court site, could provide an improved location for a school, if required, as this is adjacent to the A316, and could be accessed directly from the A316, without increasing traffic on the, already very congested, Lower Richmond Road.</u></p> <p>At Barnes Hospital (Site Allocation 37) redevelopment is expected to provide a new SEN school and health centre, along with residential.</p> <p>See details in the Site Allocations within this area:</p> <ul style="list-style-type: none"> <li>• Stag Brewery, Lower Richmond Road, Mortlake</li> <li>• <u>Chertsey Court, Lower Richmond Road, Mortlake</u></li> <li>• Mortlake and Barnes Delivery Office, Mortlake</li> <li>• Telephone Exchange and 172-176 Upper Richmond Road West,</li> <li>• East Sheen Barnes Hospital, East Sheen</li> </ul>
289	Katherine Drew, <b>The Royal Parks</b>	Place-based Strategy for Mortlake & East Sheen -				In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again.	

		specific to biodiversity and the Royal Parks' Environmental Designations					[See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 642 in relation to recognising designations and protections of the Parks]							
290	Craig Hatton, <b>Network Rail (Southern)</b>	Place-based Strategy for Mortlake and East Sheen		No			Network Rail supports reference within the strategy to 'enhance the sense of arrival and quality of the public realm at Mortlake Station, including improved accessibility through opportunities for art and wayfinding'. However, Network Rail does not believe that this place-based strategy is sound as it fails to accord with the spatial strategy of the Plan and is therefore neither positively prepared nor justified.	Network Rail believes that these soundness issues can be overcome with some additions to the wording in the strategy and site allocations so that these ' <i>actively promote improved access to the rail network for all users</i> ' and includes reference to 'capturing developer and third-party contributions to help to fund these improvements'. Reference should also be made within this to the level crossing located at Mortlake station which is a significant barrier to users. Redevelopment in and around Mortlake will result in increasing conflict between vehicles, pedestrian and cyclists with the level crossing and this challenge should be recognised in Policy.						
291	Rachel Holmes, <b>Environment Agency</b>	Place-based Strategy for Mortlake & East Sheen					<b>Place-based strategy for Mortlake &amp; East Sheen</b> We welcome that, in line with our Regulation 18 Consultation response, the 'Policy' section of the Place-based strategy for Mortlake & East Sheen emphasises the need to improve the riverside environment.							
-							<b>Site Allocation 35: Stag Brewery, Lower Richmond Road, Mortlake</b>							
292	Tim Brennan, <b>Historic England</b>	Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake					SA 35 – Stag Brewery This is another sensitive site. In the interests of clarity and to ensure key considerations are embedded in local plan policy, we recommend that the sensitivities as set on page 177 of the Urban Design Study are included in the site allocation vision.							
293	Richard Carr, <b>Transport for London (TfL)</b>	Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake					<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Site Allocation 34 [now Site Allocation 35]: Stag Brewery, Lower Richmond Road, Mortlake</td> <td>We note the statement that '<i>The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where necessary improvements to sustainable modes of travel, including public transport facilities, are secured as part of any development proposal. The opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site should be investigated as part of the comprehensive redevelopment.</i>' Although we support the requirement for bus standing space within the development site, TfL does not support the closure of Avondale Road Bus station. The proposed bus standing within the Stag Brewery site should be regarded as additional to, and independent of, the bus stops and turning facility at Avondale Road.</td> <td>We reiterate our previous comments that the proposed bus standing within the Stag Brewery site should be regarded as additional to, and independent of, the bus stops and standing facility at Avondale Road. To ensure consistency with London Plan Policy T3 the wording should be amended to remove reference to the Avondale Road bus station by replacing the current wording: 'The opportunity to relocate the bus stopping/turning facility from Avondale Road bus station to this site should be investigated, if appropriate, as part of a comprehensive redevelopment' with 'Additional bus standing space is likely to be required within the development site.'</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Site Allocation 34 [now Site Allocation 35]: Stag Brewery, Lower Richmond Road, Mortlake	We note the statement that ' <i>The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where necessary improvements to sustainable modes of travel, including public transport facilities, are secured as part of any development proposal. The opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site should be investigated as part of the comprehensive redevelopment.</i> ' Although we support the requirement for bus standing space within the development site, TfL does not support the closure of Avondale Road Bus station. The proposed bus standing within the Stag Brewery site should be regarded as additional to, and independent of, the bus stops and turning facility at Avondale Road.	We reiterate our previous comments that the proposed bus standing within the Stag Brewery site should be regarded as additional to, and independent of, the bus stops and standing facility at Avondale Road. To ensure consistency with London Plan Policy T3 the wording should be amended to remove reference to the Avondale Road bus station by replacing the current wording: 'The opportunity to relocate the bus stopping/turning facility from Avondale Road bus station to this site should be investigated, if appropriate, as part of a comprehensive redevelopment' with 'Additional bus standing space is likely to be required within the development site.'	
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294	Jo Edwards, <b>Sport England</b>	Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake					support retention / reprovision of play field in vision							
295	David Wilson, <b>Thames Water</b>	Site Allocation 35 Stag Brewery, Lower Richmond					Thames Water <b>Site ID</b> 65562 (Pending) <b>Water Response:</b> The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to							

		Road, Mortlake				<p>ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p><b>Waste Response:</b> The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>.</p> <p><b>Additional Comments:</b> With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water and aim for greenfield runoff rates we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.</p>	
296	Craig Hatton, Network Rail (Southern)	Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake				<p>The site allocation, and current planning application being determined by the Council, indicates a significant re-development of the site to effectively provide a new centre for Mortlake. A development of the size and scale proposed will only exacerbate the challenges of the level crossing and ensuring people can safely cross and also access the station. Whilst there is an existing footbridge which takes people away from the crossing this is not suitable for all, especially more vulnerable users, and this means the crossing remains a barrier. To mitigate safety issues around this, opportunities to secure developer and other third-party contributions should be sought to help address the issues arising from development.</p>	<p>To make it sound, the allocation should be amended to include reference to securing 'developer and third-party contributions towards improving identified factors that impact access to and around the station for all users'. Additionally, reference should be made within this allocation to the level crossing and the potential to secure any further safety mitigations that may be required for this, due to development.</p> <p>Given the prominence and location of the level crossing in Mortlake, that it is not considered within the site allocation nor the strategy in any detail is concerning. The Stag Brewery Planning Brief also fails to mention the issues of the level crossing and this needs to be addressed to ensure the impacts of the crossing in the wider context of the scale of development proposed.</p>
297	Tim Catchpole, Mortlake with East Sheen Society	Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake				<p><b>Site allocation 34: The Stag Brewery</b> [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 652 in relation to the Stag Brewery]</p> <p>We agree with the 7-storey height limit shown in the Planning Brief and reinforced in your recent Urban Design study and we are very disappointed to see a 9-storey building and several 8-storey buildings just recently approved (subject to Mayoral direction). As for the school, we still do not accept it for the six reasons given, nor do we accept the arguments you have lifted from AfC's recent SPSS report.</p>	
298	Rachel Holmes, Environment Agency	Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake				<p><b>Site Allocation 35 - Stag Brewery, Lower Richmond Road, Mortlake</b></p> <p>This site has been identified as a key opportunity for WFD improvement by way of managed realignment of the flood defence. Actions required to deliver such an improvement involve set back of the flood defence and replace stone/concrete slope with bioengineered design at grid reference TQ2066776024.</p> <p>This will provide improvement to WFD status by re-naturalising the modified bank, providing benefits to biodiversity and the geomorphology of the river. We would recommend that any development at this site comes with the expectation of carrying out such an intertidal enhancement.</p> <p>We understand the Local Planning Authority's reasoning for not including additional references to flood risk requirements due to these aspects already being included within other policies.</p>	
299	Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common	Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake				<p>[See modifications considered necessary].</p>	<p><b>Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake Site Proposal</b></p> <p>The Council will support the comprehensive redevelopment of this site, <u>with a forward-thinking visionary feel embracing 'green infrastructure' and initiatives wherever possible, such as G8 food growing and LP17 green walls and roofs.</u> -An appropriate mix of uses, particularly at ground floor levels, should deliver a new heart and centre for Mortlake. The provision of <del>an on-site new 6-form entry secondary</del> school, <u>if capacity is required plus sixth form, will be required.</u> Appropriate uses, in addition to educational, include residential (including <u>3+ bed</u> affordable housing <u>for social rent</u>), employment, commercial such as retail and other employment generating uses, <u>additional</u> health facilities <u>including GP services which are currently at capacity</u>, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and/or re-provision and upgrading of the playing fields, <u>without the loss of overall green space.</u> The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly</p>





											<p>sport uses has to be carried out in line with Policy 37, the NPPF and Sport England Policy.</p> <ul style="list-style-type: none"> <li>The adopted development brief (2011) identifies a number of transportation and highway issues. The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where necessary improvements to sustainable modes of travel, including public transport (<a href="#">rail and buses</a>), <a href="#">active travel (bike, scooter etc)</a> and <a href="#">pedestrian safety facilities</a>, are secured as part of any development proposal. The opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site should be investigated as part of the comprehensive redevelopment, <a href="#">but not if it results in the removal of additional green space in the development</a>.</li> <li>There is potential opportunity in the tall building zone (7 storeys), with a mid-rise zone buffer (5- 6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones, although the Urban Design Study 2021 recognises the limits due to the sensitivities of the surrounding context.</li> <li>Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Urban Design Study 2021 in the character area profile and design guidance for H1 Mortlake Riverside and the Mortlake Village Planning Guidance SPD</li> </ul> <p><b>Ownership:(public/private/mixed/unknown)</b> Private</p> <p><b>Expected Implementation Timescale</b> Short- term (0-5 years) <b>Medium (5-10 years)</b> Long (10-15 years)</p>
-	Smruti Patel (Avison Young), <b>Avanton Richmond Developments LTD</b>										[See also comment 263 in relation to Site Allocation 29: Homebase, Manor Road, North Sheen, the Urban Design Study and building heights which references the Stag Brewery]
-											<b>Site Allocation 36: Mortlake and Barnes Delivery Office, Mortlake</b>
300	David Wilson, <b>Thames Water</b>	Site Allocation 36 Mortlake and Barnes Delivery Office, Mortlake									<p>Thames Water <b>Site ID</b> 41237 (Reviewed Oct17)</p> <p><b>Water Response:</b> On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Additional Comments:</b> With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water and aim for greenfield runoff rates we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.</p>
-											<b>Site Allocation 37: Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen</b>
301	David Wilson, <b>Thames Water</b>	Site Allocation 37 Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen									<p>Thames Water <b>Site ID</b> 49791 (Reviewed Jan18)</p> <p><b>Water Response:</b> On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p> <p><b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact</p>

						Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ <b>Additional Comments:</b> With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water and aim for greenfield runoff rates we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.	
-						<b>Site Allocation 38: Barnes Hospital, East Sheen</b>	
302	David Wilson, <b>Thames Water</b>	Site Allocation 38 Barnes Hospital, East Sheen				Thames Water <b>Site ID 24141</b> (Allocated site pending, Reviewed 10/12/21) <b>Water Response:</b> On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ <b>Waste Response:</b> On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ <b>Additional Comments:</b> With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water and aim for greenfield runoff rates we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.	
303	Rachel Holmes, <b>Environment Agency</b>	Site Allocation 38 Barnes Hospital, East Sheen				<b>Site allocation 37 - Barnes Hospital, Mortlake and East Sheen: [now Site Allocation 38]</b> We welcome that reference to our intention to update the flood risk modelling has been noted as part of this site allocation.	
-						<b>Place-based Strategy for Barnes</b>	
304	Craig Hatton, <b>Network Rail (Southern)</b>	Place-based strategy for Barnes				Network Rail supports the strategy in seeking to improve connectivity including wayfinding from the station (in point 3) and improving the public realm to enhance the sense of arrival at Barnes Station (point 4). Network Rail also supports the additional policy initiative around step free access at Barnes Bridge station. Network Rail are keen to help the Council in this aim and to work with the Council to investigate suitable funding opportunities for this. Network Rail believes a similar approach could be adopted for other stations in the Borough where there are identified improvements required, such as at Fulwell and North Sheen, and this could be included within their respective place-based strategies.	
305	Rachel Holmes, <b>Environment Agency</b>	Place-based Strategy for Barnes				<b>Place-based strategy for Barnes</b> We welcome that this place-based strategy has been updated in line with our Regulation 18 consultation response to ensure that any works to the terrace are in accordance with other flood risk and biodiversity policies.	
-						<b>Policies</b>	
306	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	General - Policies				[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 673... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 673 in relation to this heading]	
307	Peter Willan and Paul Velluet, <b>Old Deer Park Working Group</b>	General - Policies				[See comment 21] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: 674... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 674 in relation to this heading]	
-						<b>Responding to the climate emergency and taking action</b>	
308	Tim Brennan, <b>Historic England</b>	Responding to the climate emergency and taking action				Chapter 16 We support the intention behind the policies and text in Chapter 16 of the draft Plan in addressing the challenges of climate change on the borough. It is important to emphasise that Historic England recognises the urgent need for positive action to tackle climate change and is committed to achieving net zero. As an organisation we have a duty of	

							care to protect our heritage. We actively seek and promote actions that address the causes of climate change and that reduce greenhouse gas emissions. However, it would be helpful within Chapter 16 to make clear that inappropriate while well-intentioned retrofit measures to historic buildings may not only adversely affect heritage significance but could also worsen rather than reduce carbon emissions. We therefore recommend that policy 4 makes clear that refurbishment/retrofitting projects to improve energy efficiency will also need to satisfy the requirements of policies elsewhere in the plan dealing with change to heritage assets. This could also be underpinned by explanatory text in Chapter 16 that sets out the following approach to such measures: <ul style="list-style-type: none"> <li>• The importance of ongoing maintenance as a method of both monitoring energy performance of existing buildings and ensuring its effectiveness</li> <li>• Adopting an approach that as a starting point is iterative and looks for lower cost and minimally invasive interventions</li> <li>• Emphasising that small scale changes, such as secondary glazing and window and door repair, can deliver significant benefits.</li> </ul>	
309	Elena Mikhaylova	Policies 3, 4 and 5	No	No	No	Positively Prepared; Effective; Justified; Consistent with national policy	Policy 3 Tackling the Climate Emergency (Strategic Policy) Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy) Policy 5 Energy Infrastructure (Strategic Policy) There is no climate crisis and the Council used a small biased study for justification of this policy. There is no scientific evidence to back it. You have not listed to any of the studies based on facts that there is no climate emergency. Local people have never asked you to declare such emergency. There is no such thing as Net Zero and you just use buss words to restrict people’s freedoms. Nobody voted for the council to use our money to implement this policy and therefore it must be stopped immediately. Furthermore, there will be significant financial burden to local people and Businesses which you will be legally responsible for if this policy goes ahead.	All policies mentioned in my comments above must be cancelled immediately.
310	Tim Catchpole, Mortlake with East Sheen Society						<b>Theme: Responding to the climate emergency and taking action (Policies 3-9)</b> [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments – comments 683, 689, 696, 697, 708, and 711 in relation to these policies] No comments on your responses.	
-							<b>Policy 3. Tackling the Climate Emergency (Strategic Policy)</b>	
311	Louise Fluker, The Richmond Society	Policy 3 Tackling the Climate Emergency (Strategic Policy), Para D		No		Effective	The Policy does not acknowledge that existing buildings are old, energy and water inefficient and that the emissions and other targets will not be met without retrofitting existing buildings	Amend Para D to read: The Council will work with partners and local communities to improve the energy and water efficiency of the existing building stock and wider public realm, with a particular focus on increasing energy and water efficiency of homes and businesses, especially improved insulation in lofts, walls and floors. The Council’s Carbon Offset Fund will be used to implement projects to reduce carbon emissions and water savings across the borough.
312	James Stevens, Home Builders Federation	Policy 3 Tackling the Climate Emergency (Strategic Policy)		No		Effective	<b>Part B of the policy is unsound because it is imprecise and so it is ineffective.</b> Part B, 1 of the policy states, that climate objectives will, in part, be met in the following way: <i>reduce greenhouse gas emissions in accordance with the London Plan’s Energy Hierarchy and support the transition to a low carbon society by maximising energy efficiency, zero and low carbon heat and local renewable energy generation;</i> It is not clear what this means for new residential development. We note, however, supporting para. 16.3 which states at the end that: <i>all new development proposals coming forward within the borough should be zero carbon.</i> It is not clear when this expected, although we suspect that it is a requirement from the date the Plan is adopted. The Council should clarify this. This seems confirmed by Policy 4.	
313	Zoe Chick, River Thames Scheme	Policy 3 Tackling the Climate Emergency (Strategic Policy)					The RTS supports this policy, particularly parts 5, 6 and 7 which state: <i>‘5. adapt to the changing climate by minimising the effects of overheating, mitigating the urban heat island effect, managing flooding, and minimising energy consumption in accordance with the London Plan’s Cooling Hierarchy;</i> <i>6. enhance and improve the borough’s green and blue infrastructure to ensure it delivers multi-functional benefits, such as enhancing micro-climates and natural carbon sinks as well as improving air quality;</i> <i>7. adopt an integrated approach to water management which considers flood risk and flood storage, sustainable drainage, water efficiency, water quality and biodiversity;’</i>	<b>Recommended action:</b> For information only, no action required.
314	Rachel Holmes, Environment Agency	Policy 3 Tackling the Climate Emergency (Strategic Policy)					We welcome that, in line with our Regulation 18 consultation response recommendation, a reference to flood storage as well as flood risk has been incorporated into Part B of Policy 3 ‘Tackling the climate emergency’ (Strategic Policy).	
315	Rachel Holmes, Environment Agency	Policy 3 Tackling the Climate Emergency					As mentioned in our Regulation 18 response [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 686 in relation to Policy 3], we feel that the intrinsic link between the climate emergency and biodiversity crises should be further emphasised within this policy.	

		(Strategic Policy)					Climate change is one of the main drivers for biodiversity loss, and the destruction of ecosystems undermines nature's ability to regulate greenhouse gases, however, biodiversity is only mentioned once within this policy. Again, we recommend that the link between biodiversity and the climate crisis is expanded within the policy and is linked to the net gain policy set out in Policy 39: Biodiversity and Geodiversity.	
316	Richard Mundy	Paragraph 16.6 (retrofit of building stock for decarbonisation).	Yes	No	Yes	Effective	Richmond Council's currently-published policies discourage cost-effective decarbonisation, particularly in conservation areas. One example is that to get serious about decarbonisation, Richmond Council needs to encourage replacement of heritage single pane windows with modern double glazing, which tends to be cheapest when uPVC. In contrast, currently the policy is to encourage retention of wood and installation of not so effective secondary glazing instead. Another example is that Richmond Council should encourage installation of solar panels in appropriate directions (e.g. south-facing) even when facing the front of the property. Yet another example is that Richmond should allow people to add bike shelters and car chargers in front of their houses.	I suggest that Richmond Council plans to change its policies to increase the decarbonisation of its existing building stock, at the expense of some degradation to the visual appeal of its streets, including in conservation areas.
-	Elena Mikhaylova	Policies 3, 4 and 5	No	No	No	Positively Prepared; Effective; Justified; Consistent with national policy	[See comment 309 in relation to Policy 3]	
-							<b>Policy 4. Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)</b>	
317	Louise Fluker, The Richmond Society	Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)	Yes	No	Yes	Effective	Policy 4 does not mention retrofitting existing housing stock or buildings although Policy 3 refers to the importance of this.	Policy 4 requires a statement by the Council regarding its position and policies on retrofitting existing buildings
318	James Stevens, Home Builders Federation	Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)		No		Justified	<p><u>The policy is unsound because it is ineffective and unjustified.</u></p> <p>We recommend that the Council does not insist on development being net zero carbon from the date the plan is adopted. Instead, the Council should adhere to the government's agreed programme of moving towards net zero carbon from 2025 onwards.</p> <p>They will be 'zero carbon ready' from 2030 onwards. It is not feasible technically at present to build to net zero owing to a combination of the lack of deployable and cost-efficient technologies and skills shortages. The Government has established a stepped pathway via the Building Regulations towards new homes being net zero by 2038. This timetable takes into account the lead-in times associated with developing, testing and manufacturing new technologies and the time required to train the skilled workforce needed. Consequently, the Government, through the Building Regulations has stepped targets for homes to become increasingly energy efficient – with steps in 2022 and 2025 and to be 'zero carbon ready' – but not zero carbon from 2030 onwards.</p> <p>A pathway to zero carbon homes has been devised by the Future Homes Hub and agreed with government departments, and bodies such as the RTPI and the RSPB. This aims for homes to be zero carbon ready from 2030. Accelerating this timetable will have serious cost implications and consequently, serious implications for housing delivery.</p> <p>But not only that, there may be serious safety issues. As we have already seen with Class 0 of the Building Regulations, it is uncertain whether many of the building technologies proposed to help move towards zero carbon, are safe. Many of these technologies will need to be tested rigorously before they are deployed. While there is much 'boosterism' around modern methods of construction, some are raising doubts about the wisdom of accelerating the deployment of untested methods. The National Fire Chiefs Council (NFCC) released on 6 December 2022 a Position Statement on Modern Methods of Construction (MMC). They have commented that the ambition to build homes quickly and sustainably, should not be prioritised at the expense of building safety. The NFCC is calling on the Government for tightened rules for the testing of MMC. The NFCC has commented:</p> <p><i>"NFCC is concerned that MMC buildings are being designed, approved and built despite a lack of understanding about their performance. Given the current regulatory system has already been described and accepted by Government as 'not fit for purpose' even for traditional construction techniques, this adds additional uncertainty in the built environment."</i></p> <p>In view of these concerns, we advise that the Council adheres to the national timetable for moving towards zero carbon homes, delivered through the Building Regulations, and avoids encouraging the deployment of untested technologies in the borough.</p>	



					<p>Expecting net zero homes earlier than the national timetable agreed will have consequences for affordable housing supply. The supply of affordable housing should be the foremost priority for the Council. Its Local Housing Market Assessment report, 2021, concluded that the need for affordable housing – social rent and affordable rent - could be as high as 1,123 dwellings per year (para. 5.55). As the report observes in para.5.60:</p> <p><i>the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the Borough. The need identified in this report provides a starting point for setting policy which should be tested against the amount of affordable housing that can viably be provided. The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise.</i></p> <p>By contrast, requiring net zero for homes now, would militate against housing supply generally, thereby reducing the supply of affordable homes and it is unlikely to be achievable in any case. Paragraphs 6.13 and 6.14 of the Local Plan Viability Assessment provide sober reading. I have reproduced both paragraphs below:</p> <p>6.13 Where sales values are at the lower end of the tested range (£7,130 per square metre), many schemes are unviable are unviable at zero affordable housing when tested against existing residential and secondary office benchmark land values. This is not an issue caused by policy, but simply a function of the relationship between the residual land values generated by development and the existing use value of certain types of building. In lower value areas, the extent of uplift above existing use values is significantly lower than in higher value areas and consequently there is less scope to meet policy requirements. These results indicate that in lower value areas, sites with these benchmark land values are more likely to stay in those existing uses, rather than come forward for development. However, when considered against secondary industrial and backland/garden benchmark land values, schemes of all sizes can viably provide up to 50% affordable housing and some of the larger schemes can deliver varying percentages of affordable housing.</p> <p>6.14 As sales values increase, the extent to which schemes can provide affordable housing increases, but to varying degrees, with a range of outcomes at the highest sales values in the range (£9,880 per square metre). Even at the highest sales values in the range, the viable level of affordable housing does not exceed 35% when schemes are tested against existing residential sites. However, maximum viable percentages increase when the secondary office benchmark land value is used.</p> <p>In summary, it will be a struggle for residential schemes to achieve 50% affordable housing especially on existing residential land. The development of industrial land will be unlikely given the restrictions in the London Plan on the redevelopment of such sites. Requiring net zero homes in 2025 would make the prospect of 50% affordable housing even less likely.</p> <p>We note paras. 4.18 and 4.19 of the viability assessment. It estimates that the cost of complying with the Council's zero carbon could add 5% to residential build-costs for operational carbon and 15% for operational and embodied carbon – the latter reflecting the approach of the London Plan and the Council. Para. 6.51 of the viability assessment observes later that the cost of trying to address the embodied carbon requirement causes a number of viable schemes to become unviable. In the same paragraph the report observes:</p> <p>This is unsurprising, given that the additional cost equates to 15% of base constructions costs, compared to a 5% cost uplift for operational carbon only. The costs of addressing embodied carbon are likely to reduce over time as developers invest more in technical solutions. Furthermore, some specialists in this area are already arguing that the costs of addressing embodied carbon may be cost neutral.</p> <p>The cost could well go down, although they are unlikely to be neutral (the specialists employed by the housebuilding industry would disagree with the specialists advising the council, but then that is to be expected), but the Council has to base its decision on its viability report rather than speculating on possible scenarios. If its assessment of viability is raising potential issues, then the Council should take heed.</p> <p>The panel examining the last London Plan also acknowledged that it could not be assumed that all the policies in the London Plan were necessarily viable. Although the Panel recognised that the London Plan had been informed by a viability study, it recognised that this was a very high-level study that had to rely on some very generalised assumptions about a range of factors for a very wide geographic area with varying circumstances and market conditions. The Panel concluded that it would be difficult to conclude that every policy in the London Plan would be deliverable, and deliverability (and viability therefore) would have to be tested at the level of local plans. See paragraphs. 84-89 of the Panel Report.</p> <p>Specifically, as the Panel observed at para.84:</p> <p><i>Whilst the LPVS (London Plan Viability Study) is proportionate evidence for the Plan, local plans in London will also be subject to viability testing. Furthermore, both local plans and development proposals will be prepared in the context of current national policy and guidance about viability. Proportionate viability assessments at local plan level will almost certainly need to go into considerably more detail than the LPVS, including where necessary about key sites, taking account of locally specific evidence. The Plan needs to reflect this fact, and the inevitable limitations of a strategic-level viability assessment.</i></p> <p>From this, the Panel recommended changes were made to London Plan policy DF1: Delivery of the plan and planning obligations, so that it is clear that the local plans prepared by the London boroughs, should prioritise certain obligations, especially affordable housing and public transport, where viability was an issue (para. 89). Changes to London Plan policy DF1 were made to this effect.</p> <p>As London Plan Policy DF1 states at part D:</p> <p><i>D When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this:</i></p>	
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							1) recognise the role large sites can play in delivering necessary health and education infrastructure; and 2) recognise the importance of affordable workspace, and culture and leisure facilities in delivering good growth. The Council should reconsider the requirement for zero carbon homes so it can prioritise affordable housing supply.	
319	Smruti Patel (Avison Young), Avanton Richmond Developments LTD	Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)	No	No	No	Justified; Consistent with national policy	<p>Draft policy 4 is not in accordance with national policy, not in general conformity with the London Plan, nor justified. Policy SI 2 of the London Plan sets a carbon cash-in-lieu payment of £95/t, which is based on a nationally recognised non-traded price that has been tested as part of the viability assessment for the London Plan, which boroughs may use to collect carbon offset payments.</p> <p>The GLA guidance for London’s local planning authorities on establishing carbon offset funds (October 2018) requires that “LPAs should development and public a price for offsetting carbon based on either: a nationally recognised carbon pricing mechanism; or the cost of offsetting carbon emissions across the LPA. <b>The price set should not put an unreasonable burden on development and must enable schemes to remain viable.</b>”</p> <p>The Climate Change – Local Plan Net Zero Carbon evidence base, April 2023, does not contain any discussion on the suitability of the £300/t rate, and the ‘best practice’ specification used in the sample study assumes an exemplary level of building fabric performance, not best practice. The result of this is lower than usual offset payments, which are not representative of current industry practices. The evidence base therefore does not take into account relevant market signals and cannot be considered sound. The evidence base must consider best industry practice schemes to demonstrate that the £300/t rate would not place unreasonable burden on developments and would not jeopardise the viability of future schemes.</p> <p>The Local Plan Viability Assessment (2023) prepared by BNP Paribas assesses the viability of the emerging local plan policies individually, assuming the provision of 35% affordable housing (70% rented and 30% shared ownership). The individual policies should be tested in accordance with the requirements set out in LBRuT’s draft policy 11 for the provision of all major residential development to bring forward 50% affordable housing <b>as a minimum</b> to provide a more accurate evidence base and demonstrate the carbon offset price does not put an unreasonable burden on development, enables schemes to remain viable and the plan is deliverable.</p> <p>Notwithstanding the above, in testing the carbon offset rate of £300/t, the results find that it would not be viable for a significant proportion of the testing scenarios and it has not been demonstrated, as required by the London Plan, that the price does not place an unreasonable burden on development. The London Plan carbon offset price of £95 per tonne has been tested as part of the GLA viability assessment. This is intended to be the price LPAs adopt. Where following a ‘cost of offsetting’ route, the LPA should include an assessment of the carbon offsetting measures that are possible in the LPA, and dividing the average cost per tonne per year of these measures by the expected shortfall in emissions from the anticipated development coming forward over the next 30 years. In review of the LBRuT Climate Change – Local Plan Net Zero Carbon evidence base (April 2023), a justified evidence base for the £300/t figure has not been provided.</p> <p>In lieu of an appropriate evidence base for the £300/t carbon offset figure, it is recommended that the LBRuT local plan defers to the GLA viability tested £95/t figure in accordance with the London Plan (2021).</p> <p>Table 16.1 sets out the on-site carbon emission reduction requirements for new developments and requires development to major residential, new build residential and non-residential development to achieve a minimum 60% on-site carbon reduction. The requirements go beyond the currently adopted national and London Plan policies. It is intended for the Future Homes Standard to gradually increase targets for on-site savings to 60% to allow a gradual transitional period for the construction industry to adjust. Furthermore, the GLA are due to release a revised Energy Assessment Guidance (2022) to compliment the newly published Approved Document Part L 2021, which will address the improved carbon reduction target and how this should be assessed on schemes within London going forward. With the continual carbon reduction targets being imposed under the Future Homes Standard (31% under ADL 2021, and 75% under ADL 2025), and the anticipated update to the GLA Energy Assessment Guidance (2022), it is recommended that the policy targets be amended to track London Plan 2021 targets, which shall develop in-sync with the Future Homes/Buildings Standard.</p>	
320	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer	Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<p>Policy 4, as currently drafted, is not in accordance with national policy, not in general conformity with the London Plan, nor justified. We recommend that it is amended to fully conform with the London Plan which would make it sound, as explained below:</p> <p><b>Explanation</b></p> <p>Changes to Regulation 19 to incorporate Approved Document Part O 2021 (AD O) are welcomed, but please note the wording in the Draft Local Plan is incorrect. AD O relates to residential buildings only, and TM52 and TM59 are represented the wrong way around in print, as these relate to non-domestic and domestic respectively.</p> <p>The introduction of Energy Use intensity reporting is in-line with London Plan requirements, and CIBSE TM31 logbook requirements are in-line with Approved Document Part L 2021.</p> <p>An evidence base has now been provided in an attempt to justify setting £300/t rate (Climate Change – Local Plan Net Zero Carbon evidence base, April 2023). It is apparent from the revision table and Section 2.1 that this study has been completed retrospectively after the issue of the Regulation 18 Draft Local Plan as justification for setting the carbon offset payment rate, which brings into question how sound the evidence is in validating the Regulation 18 policy. The evidence base does not contain any discussion on the suitability of the £300/t rate, and the ‘best practice’ specification used in the sample study assumes an exemplary level of building fabric performance aligning with PassivHaus standards, not best practice. The result of this can be seen in lower than usual offset payments, which are not</p>	<b>Recommendation</b> In lieu of an appropriate evidence base for the £300/t offset figure, it is recommended that the GLA viability tested £95/t figure be kept, in accordance with the London Plan (2021).

						representative of current industry practices and therefore places an unreasonable burden on developments and would jeopardise the viability of future schemes. The Greater London Authority guidance for London's Local Planning Authorities on establishing carbon offset funds (October 2018) requires that "LPAs should develop and publish a price for offsetting carbon based on either: a nationally recognised carbon pricing mechanism; or the cost of offsetting carbon emissions across the LPA. <b>The price set should not put an unreasonable burden on development and must enable schemes to remain viable.</b> " The London Plan carbon offset price of £95 per tonne has been tested as part of the GLA viability assessment. This is intended to be the price LPAs adopt. Where following a 'cost of offsetting' route, the LPA should include an assessment of the carbon offsetting measures that are possible in the LPA, and dividing the average cost per tonne per year of these measures by the expected shortfall in emissions from the anticipated development coming forward over the next 30 years. In review of the LBRuT Climate Change – Local Plan Net Zero Carbon evidence base (April 2023) it is clear that a justified evidence base for the £300/t figure has still not been provided.		
321	Summer Wong (RPS), <b>Notting Hill Genesis</b>	Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy) (p.186-187)	No	N	N	Positively Prepared; Justified; Effective; Consistent with national policy	<b>Policy 4 Minimising Greenhouse gas Emissions and Promoting Energy Efficiency (Strategic Policy) (p.186-187)</b> We welcome the Council's aspirations to achieve a borough target of net-zero carbon by 2043 and we support the requirement for development to minimise greenhouse gas emissions. However, we question the onerous policy requirement of Policy 4 which goes beyond the London Plan policy without evidence-based justification. The London Plan (2021) Policy SI 2 provides greenhouse gas emission and energy targets which do not jeopardise the strategic aims for London including housing delivery. Policy 4 Part D) sets the requirements to achieve a minimum of 60% on-site carbon reduction for any new-build residential scheme (2+ units) and non-residential development of 100sqm or more. This is considerably higher than London Plan 2021 Policy SI 2 requirement, which requires a minimum of 35% on major development (10+ units; over 1,000sqm non-residential floorspace). The target set by Policy 4 seeks a higher level of on-site reduction in carbon (60%) and an even higher offset rate of £300/t when compared with the London Plan Policy SI2, this could significantly impact viability of residential schemes, thereby jeopardising the Council's aim to meet its housing targets and the delivery of affordable homes. Richmond's evidence base to the Local Plan, Net Zero Carbon Study (March 2023) prepared by CIS, did not provide any evidence to demonstrate how the £300/t offset rate has been calculated. Moreover, the evidence base report on Local Plan Viability Assessment (April 2023) prepared by BNP Paribas Real Estate did not carry out any viability assessment on how the increased carbon offset rate would impact on development viability. Policy 4 in its current form is not in general conformity with the London Plan, nor justified. We recommend that it is amended to conform with the London Plan to make it sound.	<b>Recommended Amendment</b> In the absence of an appropriate evidence base for the £300/t offset rate, it is recommended that the GLA viability tested £95/t figure, and the London Plan Policy SI 2 target of a minimum of 35% on-site carbon reduction be adopted, in accordance with the London Plan 2021. Policy 4 Part D) <i>New-build residential <del>development of 1 or more dwellings, and major development of 10 or more dwellings and non-residential development of 100sqm 1,000 sqm or more:</del></i> 1) to achieve net-zero carbon with a minimum of <del>60%</del> <b>35%</b> on-site reduction. Policy 4 Part E) Carbon offset rate to be amended from <del>£300/t</del> to <b>£95/t</b> as at 2021.
322	Neil Henderson (Gerald Eve), <b>Reselton Properties</b>	Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)		N		Positively Prepared; Justified; Effective; Consistent with national policy	We wish to reiterate our comments made in Response to the Regulation 18 Consultation process, dated 31 January 2023. [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 688 in relation to Policy 4]	Policy 4, Table 16.1 - Reselton fully support measures to minimise greenhouse gases and promote energy efficiency. However, collectively with the Mayors carbon off set payment, the proposed carbon offset of £300/t would equate to a payment nearly 4 times the current value. While technology is still evolving to meet these ambitious environmental targets, the carbon offset payment is more likely to be required initially. With such a high tariff increase, this may render many schemes unviable, particularly where there is an ambition to meet other priorities such as affordable housing. It is therefore suggested that, where it can be demonstrated that a payment in lieu is required, there should be discretion in the policy to allow this payment to be directed to other priorities in the Development Plan where it is considered appropriate to do so.
323	Natasha Styles (The Planning Bureau Limited), <b>McCarthy &amp; Stone Retirement Lifestyles Ltd</b>	Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)					Policy 4 and 6 appear to be confused and needs clarification. Policy 4 point D 1. seeks 'to achieve net-zero carbon with a minimum of 60% on-site reduction;' but what is this reduction measured against? Is it the building regulations or is it the Council's intention to fall in line with the Future Homes Standards? Para16.11 then states 'All development (residential and non-residential) should be net-zero, which means that a certain percentage of regulation carbon emissions has to be achieved on-site (see Table 16.1 above), with the remaining emissions (up to 100%) to be offset through a contribution to the Council's Carbon Offset Fund.'. Policy 4 then seeks a £300 per tonne contribution for off-site delivery as it is 'considered' that the London Plan off set price of £94/tonne is too low'. There also seems to be some cross-over with Policy 6 Sustainable Construction Standards that requires developers to complete a Sustainable Development Checklist and to achieve a four star rating under the BRE Home Quality Mark Scheme. The Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions is commendable. However, currently it appears that the Council is aiming to achieve this through having mandatory standards from adoption of the plan that may go beyond government targets but this is not clear. However, it is our view that any requirement should be 'stepped' in line with Government targets and the proposed changes to the Building Regulations. This is more desirable as there is considerable momentum from Government in preparing enhanced sustainability standards as it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years. Aligning the Council's requirement for carbon neutral development with those of Government would therefore be pragmatic and more achievable without adding additional cost through carbon off-set. It is therefore recommended that requirements are stepped in line with government targets and the Council consider combining policies 4 and 6.	<b>Recommendation:</b> <ul style="list-style-type: none"> <li>• That the policy is re-worded and stepped in line with emerging government targets</li> <li>• Policy 4 and 6 are combined for clarification. or</li> <li>• The policy is deleted as Net Zero Carbon development is to be dealt with via the Building Regulations.</li> </ul>
324	Henry Brown (The Planning	Paragraph 16.16	Yes	No	Yes	Effective; Consistent	Similarly, RBGK notes from the Regulation 19 version of the Local Plan (Policy 3, para. 16.16) that LBRuT is considering producing further guidance on energy efficiency in historic buildings. Again, this has the potential to impact Kew	

	Lab), Royal Botanic Gardens Kew					with national policy	Gardens and so we would be grateful for some further information on the programme for progressing this and opportunities to be involved.	
-	Tim Brennan, Historic England	Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)					[See comment 308 in relation to Policy 4]	
-	Elena Mikhaylova	Policies 3, 4 and 5	No	No	No	Positively Prepared; Effective; Justified; Consistent with national policy	[See comment 309 in relation to Policy 4]	
-							<b>Policy 5. Energy Infrastructure (Strategic Policy)</b>	
-	Elena Mikhaylova	Policies 3, 4 and 5	No	No	No	Positively Prepared; Effective; Justified; Consistent with national policy	[See comment 309 in relation to Policy 5]	
-							<b>Policy 6. Sustainable Construction Standards</b>	
325	David Wilson, Thames Water	Policy 6 Sustainable Construction Standards		No		Consistent with national policy	<p><b>Policy 6. Water Efficiency/Climate Change Comments</b></p> <p>We support the reference to water conservation/efficiency in Policy 6, but this needs to be strengthened to ensure the more effective implementation of water efficiency. The Environment Agency has designated the Thames Water region to be an area of “serious water stress” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. On average our customers each use 30% more water than they did 30 years ago. Our forecasting shows a significant future supply-demand deficit. To mitigate this, we’re striving to:</p> <ul style="list-style-type: none"> <li>• Reduce leakage by 50% by 2050</li> <li>• Roll out smart meters to all household and non-household connections by 2035; and</li> <li>• Deliver large scale water efficiency interventions across household and non-household properties to achieve Water Resource Management Plan targets.</li> </ul> <p>Therefore water efficiency measures employed in new development are an important tool to help us sustain water supplies for the long term.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.</p> <p>Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link: <a href="https://www.thameswater.co.uk/Be-water-smart">https://www.thameswater.co.uk/Be-water-smart</a></p> <p>It is our understanding that the water efficiency standards of 110 litres per person per day <b>is only applied through the building regulations where there is a planning condition requiring this standard</b> (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the ‘Calculation Method’ or the ‘Fittings Approach’ (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new</p>	We therefore consider that text in line with the following should be included in Policy 6: <b>“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”</b>

							dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels. We have introduced environmental incentives for developers for implementing water efficiency measures in the form of discounts to connection charges. At present these discounts on connection charges for new properties include: • Tier 1: properties meeting the optional requirement through the 'fittings approach' - £400 per property; • Tier 2: developments incorporating greywater recycling, water harvesting or other water re-use technology - £1,000 per property; or • Tier 3: developments achieving water neutrality - £1,800 per property. Further details available at: <a href="https://www.thameswater.co.uk/about-us/newsroom/latest-news/2022/feb/rewards-for-developers-who-achieve-water-neutrality">https://www.thameswater.co.uk/about-us/newsroom/latest-news/2022/feb/rewards-for-developers-who-achieve-water-neutrality</a> To date we have only had a limited uptake in claims for the discounts, even for the £200 discount for meeting the optional requirement even though compliance with the optional requirement has been included in Building Regulations since 2010.	
326	Elena Mikhaylova	Policy 6 Sustainable Construction Standards	No	No	No	Positively Prepared; Effective; Justified; Consistent with national policy	"Development that results in a new residential dwelling, including conversions, change of use, and extensions that result in a new dwelling unit, will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption)." The above standard is a direct violation of the Human rights and specific individuals who developed this standard will be taken to Court immediately if it gets implemented.	All policies mentioned in my comments above must be cancelled immediately.
327	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer	Policy 6 Sustainable Construction Standards	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	Policy 6, as currently drafted, is not in accordance with national policy, not in general conformity with the London Plan, nor justified. We recommend that it is amended to fully conform with the London Plan which would make it sound, as explained below: <b>Explanation</b> Regulation 19 policy wording now includes a ban on gas boilers after 2024. This is not considered to be a sound policy as it is not consistent with national policy on banning this technology. The London Plan (2021) and the GLA Energy Assessment Guidance (2022) allows low NOx gas boilers to be permitted on developments as part of a viable energy strategy in certain circumstances, noting that they are suitable when it has "been clearly demonstrated that all of the above [stages of the energy hierarchy] have been fully investigated and ruled out with sufficient evidence provided". Furthermore, the ban on gas boilers by 2024 contradicts Regulation 19 Policy 3 B1 which references the London Plan energy hierarchy, of which gas boilers are a part of. This allows developments to achieve carbon reduction targets with a flexible design approach, which is most suitable and viable to each scheme. Furthermore, compliance is still achievable with Approved Document Part L (2021) via a gas boiler strategy, which in some circumstances may result in lower operational and energy bills compared to alternative heating solutions, such as a communal heat network.	<b>Recommendation</b> Recommended that gas boiler ban from 2024 is removed from policy wording, to allow national policy to set the pace as the national grid continues to decarbonise. This will allow flexibility for development in accordance with the London Plan Energy Assessment Guidance (2022) and the Energy Hierarchy.
328	Summer Wong (RPS), Notting Hill Genesis	Policy 6 Sustainable Construction Standards (p.192)	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<b>Policy 6 Sustainability Construction Standards (p.192)</b> We welcome the Council's commitment to achieve the highest standards of sustainable design and construction under Policy 6. However the requirement of BREEAM Outstanding is considered onerous and could affect the viability of residential refurbishment schemes and non-residential development of over 100sqm. Even the evidence base provided by the Net Zero Carbon Study (March 2023) acknowledges that smaller development may struggle to exceed BREEAM Excellent. The BRE defines Outstanding rating as 'exemplary' developments. Currently less than 1% of UK new non-domestic buildings have managed to achieve a BREEAM Outstanding rating, and the uplift in build cost and professional fee significantly increases from Excellent to an Outstanding rating. It is unrealistic to expect almost all of residential and non-residential development in Richmond to achieve an BREEAM Outstanding rating. This requirement could deter any new commercial development in Richmond and therefore be contrary to the Council's Strategic Vision to support growing businesses.	<b>Recommended Amendment</b> The requirement for BREEAM Outstanding rating should be removed from Policy 6, and replaced with the London Plan 2021 target BREEAM minimum performance for selected key credit criteria, such as energy and water. Policy 6 Part A) Point 3) <i>Proposals for conversions or change of use to residential will be required to meet BREEAM Domestic Refurbishment 'Outstanding' 'Excellent' standard or equivalent. If a developer can provide evidence from an accredited BREEAM assessor that achieving 'Outstanding' 'Excellent' is not technically feasible than 'Excellent' 'Very Good' would be acceptable.</i> Policy 6 Part A) Point 6) <i>New non-residential buildings over 500sqm 1,000sqm will be required to meet BREEAM Non-domestic New Construction 'Outstanding' 'Excellent' standard or equivalent. A 'verification stage' certification at post occupancy stage must also be achieved, unless it can be demonstrated that this is not feasible. If a developer can provide evidence from an accredited BREEAM assessor that achieving 'Outstanding' 'Excellent' is not technically feasible than 'Excellent' 'Very Good' would be acceptable.</i> Policy 6 Part A) Point 7) <i>All major non-residential refurbishment of existing buildings and conversions over 500sqm 1,000sqm will be required to achieve a final (post-construction) certified rating of "Outstanding" 'Excellent' under BREEAM Non-domestic Refurbishment and Fit-out "Outstanding" 'Excellent' standard or equivalent. The scope of works of the development must include a full fit-out, unless it can be demonstrated that this is not feasible.</i>
-	Natasha Styles (The Planning Bureau Limited), McCarthy & Stone Retirement Lifestyles Ltd	Policy 6 Sustainable Construction Standards					[See comment 323 on Policy 4. Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency, also seeking clarification in relation to Policy 6	



-						<b>Policy 7. Waste and the Circular Economy (Strategic Policy)</b>
329	Philip Villars, PMV Planning Limited on behalf of owner of <b>Arlington Works</b>	Policy 7 Waste and the Circular Economy (Strategic Policy) Site Allocation omission: Arlington Works	No			<p><b>Richmond Local Plan 'The best for our borough' Draft for consultation (Regulation 19)</b></p> <p>On behalf of our client, the owner of the Arlington Works site in St Margarets (see plan attached) [See Appendix 7], we write in response to the consultation on the new draft Local Plan.</p> <p>Our client submitted representations to the Regulation 18 Consultation. We have reviewed the Regulation 19 Richmond upon Thames (LBRuT) Local Plan 'The best for our borough' document and have set out our comments and suggested changes below, required in order to make the Plan sound.</p> <p>We are disappointed that our previous representations have not been addressed in the Regulation 19 version of the Plan but we remain keen to work with officers and local community to discuss how this site can best contribute towards meeting the needs of the area and the wider Borough.</p> <p>[See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comments 265 and 709 in relation to Arlington Works]</p> <p><u>The Future Use of the Site</u></p> <p>Part of the Arlington Works site is proposed to be identified as an 'existing safeguarded waste site' in the Regulation 19 version of the Local Plan. However, this waste use ceased more than 5 years ago having been cleared in 2018 following closure of the associated waste oil transfer and treatment business. The environmental permit has been accepted for surrender by the Environment Agency (EA), following removal of the site infrastructure. Therefore, in reality any future use of this part of the site for a waste use would require planning permission plus gaining an environmental permit from the EA.</p> <p>There is no reasonable prospect of an application coming forward for a waste use on the site, given its size and location within a residential area. Plus, it is unlikely that the EA would ever grant a new permit for a waste operation at the location without a building being erected as per its most recent guidance relating to appropriate measures for pollution control. The remainder of the site has no allocation and yet is clearly in need of development (see photos attached) [See Appendix 7].</p> <p>The Richmond Local Plan is the most appropriate place to release the site. We understand that a review of the WLWP which was adopted in 2015, is still to formally commence and so there is no prospect of a review of the identification of the site to take place within that process for the short/medium term. We note that Policy of the London Plan, adopted in 2021 states:</p> <p><i>"9.9.2 Any proposed release of current waste sites or those identified for future waste management capacity should be part of a plan-led process, rather than done on an ad-hoc basis."</i></p> <p>As production of the RuT Local Plan is the only plan production process for future land use within the Borough that is 'live', clearly it is the right place for release of a waste site to be considered, being part of a "plan-led process" as stipulated by the London Plan.</p> <p>As currently drafted, Policy 7 (B) of the draft Plan seeks to safeguard the Borough's waste sites [due to their initial identification in the WLWP, and ongoing confirmation via the AMR] stating that proposals affecting these sites, as well as proposals for new or additional waste management facilities, will be assessed against the policies of the West London Waste Plan and the London Plan.</p> <p>The West London Waste Plan was adopted in 2015 and therefore this Plan is no longer underpinned by a relevant and up to date evidence as required in paragraph 31 of the NPPF. It should also be noted that it was produced against the backdrop of the previous version of the London Plan adopted in 2016 (FALP) which has now been superseded by that adopted in 2021. The need to ensure the WLWP remains aligned with the changing versions of the London Plan was explicitly recognised in the WLWP in the following terms:</p> <p><b>7.3 Review of the West London Waste Plan</b></p> <p><i>7.3.1 The Plan will be reviewed following adoption of the Further Alterations to the London Plan (FALP) and any other changes to the policies of the London Plan and at least every five years. In part this is to ensure that the Plan is still meeting the apportionment requirements of the London Plan (2011) and to take into account any changes to waste management capacity and the need for the identified sites.</i></p> <p>This clause was added to satisfy the concerns of the Examination Inspector around the currency of the Plan in light of the imminent changes to the London Plan to be brought into effect by the FALP. It was intended that the continued need to identify certain sites be revisited sooner rather than later. However, eight years and a further version of the London Plan later, a formal review is still to commence.</p> <p>In these circumstances, the LBRuT Local Plan must be the appropriate place to release the site for suitable and more sustainable uses.</p> <p>There is no justification or need served by the land at Arlington Works continuing to be identified as a safeguarded waste site at all. Not only does the site make no contribution to the waste management provision in London (and hasn't for many years) and will continue in this way, by continuing to identify it as such it frustrates the appropriate development of the wider site that can make a valuable contribution to the Borough's needs in terms of jobs and homes.</p> <p>As a sustainable and accessible brownfield site close to St Margaret's local centre and train station, with a PTAL rating of 3, the Arlington Works site offers a regeneration opportunity with excellent potential for contributing to the delivery of much needed housing as well as providing upgraded employment floorspace and heritage benefits. A suitable allocation can unlock significant beneficial development and investment which will be lost should the site continue to be safeguarded as a waste site.</p>

						<p>Unless the safeguarded site listing is revisited, as currently drafted, the Plan will continue to safeguard a disused and unsustainable waste site. This would be in direct conflict with Policy GG2 of the London Plan relating to making the best use of land. The Arlington Works site should therefore be re-allocated through this Local Plan review process. We also note that the Council's previous position on the de-designation of the Arlington Works site as an existing waste site was set out in its response to the Inspector examining the previous Plan in 2017 reproduced below:</p> <p><i>"The WLWP has been adopted in 2015 and it does not form part of this Local Plan Review. It should be noted that Richmond Council would be unable to make changes to the WLWP as part of this Local Plan as the WLWP has been produced and adopted in co-operation with other boroughs, including the OPDC, and the designation of Arlington Waste Works as an existing waste management site can only be considered as part of a review into the WLWP, together with the other LPAs. Therefore, this Local Plan does not / cannot change the status of this safeguarded waste site, and it is not proposed that this site is designated as anything else within the Plan."</i> (emphasis added)</p> <p>This statement is erroneous being contrary to the West London Waste Plan safeguarding policy which includes a footnote that states:</p> <p><i>"...The latest list of existing waste management sites will be found in Authority Monitoring Reports."</i></p> <p>and we note that the following clause was introduced into Paragraph 6.5.6 of the current Local Plan at the behest of the Inspector:</p> <p><i>[new para] "The existing waste management sites as set out in Appendix 2 of the West London Waste Plan were identified at a snapshot in time. <b>This list can be revised.</b> New waste sites, permissions and licences may be granted by the Council or Environment Agency. The Council carries out regular monitoring of existing waste sites, the results of which, including maps of operational sites, are published as part of the Authority's Monitoring Report."</i> (emphasis added)</p> <p>This means the Arlington Works site may be released from identification as a safeguarded site in the WLWP through release of an up-to-date AMR by the Council. We note that the Council's previous AMR relating to this matter was released at a similar time in the previous Plan production process. This actually confirmed release of a number of waste sites previously identified as safeguarded. We also note that other LPAs party to the WLWP have also released land allocated for waste use in the WLWP since its adoption.</p> <p>Finally on this matter we note that Proposed Allocation 12 for The Stoop is immediately adjacent to an identified safeguarded waste site within the Borough, Twickenham Depot, that is also allocated to assist in meeting the London Plan apportionments for the combined West London Boroughs, so should be afforded a high level of protection under safeguarding policy.</p>		
330	Nikki Nicholson, Surrey County Council	Policy 7 Waste and the Circular Economy (Strategic Policy)				<p><b>Minerals and Waste Planning</b></p> <p>SCC welcomes the approach to waste management in the Richmond Local Plan and its emphasis on providing for a circular economy (paragraphs 16.44 to 16.53).</p> <p>[See also comment 200 in relation to Site Allocation 12]</p>	<p>Policy 7 seeks to minimise the amount of waste managed by way of disposal and contribute towards the borough being more self sufficient in managing its waste. However, SCC would suggest that reference is made in Policy 7 to the Waste Hierarchy.</p> <p>It may also be helpful to reference paragraph 8 of the National Planning Policy for Waste 2014 (NPPW) relevant to Policy 7. This explains how the London Borough of Richmond upon Thames should determine applications for non-waste development in the context of sustainable waste management. Paragraph 4 of Policy 7 does not provide certainty in this regard particularly in respect of the statement that "developments that are likely to generate large amounts of waste, are required to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials". Paragraph 8 of the NPPW explains that for all non-waste development the London Borough of Richmond upon Thames should ensure that "the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities and minimises off-site disposal."</p>	
331	Rachel Holmes, Environment Agency	Policy 7 Waste and the Circular Economy (Strategic Policy)				<p>In our Regulation 18 response, we requested that the policy included the requirement for a Construction Environment Management Plan (CEMP) for all development using the river to transport construction materials and waste to demonstrate how the river will be protected. We recommend that this requirement is stated within the policy, as the protection of the river ecosystem is of paramount importance.</p>		
-						<p><b>Policy 8. Flood Risk and Sustainable Drainage (Strategic Policy)</b></p>		
332	Alan Smith	Policy 8, Paragraph numbers 16.52 - 16.86, Sustainability Appraisal: page 29, Table 1.3 item5	No	N	N	<p>Positively Prepared; Justified; Effective; Consistent with national policy</p>	<p>My adverse comments and concerns all relate to the mismatch in the content of the Draft Local Plan and its related Sustainability Appraisal on Flood Risk Strategies and risk reductions / no intensification of use / provision of compensation required. The "Strategic Policy" states</p> <p>To enable development, proposals must provide mitigation and resilience against flood risk, taking advice from the Lead Local Flood Authority (LLFA) as appropriate, and provide appropriate compensation to existing flood risk levels and volumes, addressing the predicted 1 in 100 year Risk of Flooding from Surface Water (RoFSW) mapped depths as a minimum. In Flood Zones 2 and 3, all proposals on sites of 10 dwellings or more or 1000sqm of non-residential development or more, areas at Risk of Flooding from Surface Water in a 1 in 100 year event or greater, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted. D. Where a Flood Risk Assessment is required, on-site attenuation to alleviate fluvial and/or surface water flooding over and above the Environment Agency's floodplain compensation is required where feasible.</p> <p>Study of the site specific locations particularly those in the main High Street Zone are all in key areas at risk.</p>	<p>The LEAD flood risk strategy must remain with EA / SFRA and rely on whole river basin flood risk control and management including the Thames Barrier / tidal surges that prevent normal river tidal flows from upstream being able to be discharged safely and timely.</p> <p>This Draft Local Plan appears to inadequately address and recognise this hierarchy transparently despite reference in the Sustainability Appraisal at ITEM 5 - see above extract. in principle to "avoid or reduce" flood risks from ALL sources.. This should include any increases in foul / surface water loading on the existing combined sewage pipework system through further development without new anti-flood measures within ALL new developments together with improved measures to "avoid and reduce" the EXISTING risks defined in the various graphs / maps etc of the SFRA &amp; EA documents.</p>

						<p>Elsewhere properties along the Riverside which are at heightened risk include sites where future development is planned.</p> <p>The Sustainability Appraisal lists at items 5</p> <p>5) To adapt to the effects of a changing climate by protecting and managing water resources, and avoiding or reducing flood risk from all sources.</p> <p>This has to be demonstrated practically and delivered in the detailed implementation of these generic policies.</p> <p>LBRuT is not the cause of major flooding risks as predicted but it is the RECEIPT of fluvial water / storm waters from others. As such the LBRuT policies and strategies must be wholly dependent on a joined up river basin strategy with the EA / others that embraces a vast area beyond LBRuT boundaries. This reality is opaque in the wording of the DRAFT documents under review. It should be wholly transparent. It is not.</p> <p>The combined risks of tidal / storm surges from the N Sea ( Thames Barrier when raised holds tidal waters in) and high rainfall in the upper Thames catchment zone causing surcharging and surface water flooding upstream of Teddington Lock at the same time will exceed temporary small flood plain capacities.</p> <p>It must be remembered that the tragic German floods and fatalities resulted from a breakdown of “planned” emergency measures, pre-warnings and other anti-flood measures in Germany in 2021. Repairs took years.</p> <p>That disaster was a failure of BOTH the established emergency warning and evacuation processes that had been set up years before to deal with such threats AND the failure of upper river basin measures to slow down and control rapid storm surface water run-off volumes entering the rivers and surcharging all existing physical barriers and other control measures. The flood risk had been predicted before and was ignored.</p> <p>The overall costs to residents and business in LBRuT should flooding of the sort / extent that occurred in Germany in 2021 would be of an order way beyond the costs of other policies herein this DRAFT. No doubt LBRuT would seek HMG support / grants / insurances. That timetable would be wholly unacceptable. It was in Germany in 2021 and remains so today. Hindsight is no reason to attempt to avoid / excuse responsibility.</p> <p>Both the LBRuT SFRA and this Draft Local Plan / Sustainability Appraisal and the EA / River Thames Scheme still rely on similar flood planning and pre-warnings to evacuate the areas at risk – NOT PREVENT / MITIGATE the flooding by upper river risk management and slowing the flow rates over many tidal periods.</p> <p>It must be remembered that if / when flooding occurs the FLOOD RE insurance scheme does NOT extend coverage to flats – of which there are many developments along the Thames within LBRuT boundary.</p> <p>Study of the content of LBRuT Strategic Flood Risk documentation and its maps confirm the full extent of the overall areas in Teddington ( others areas apply) that require more direct and positive risk reductions than those set out in the DRAFT LOCAL PLAN etc. This has to be in cooperation with other national agencies.</p> <p>There is inadequate detail and proposed measures set out in this DRAFT to reassure residents this is so.</p> <p>The need to redevelop key sites in central Teddington is understood but these local sites must be examples of how the future flood risks generally will be mitigated / removed as part of any medium / long term plan.</p> <p>It is my opinion that this is inadequate as drafted and all related flood risk strategies need a further review.</p> <p>It should include ALL related risks of sewage flooding as a result of the system being unable to accept new intake capacity due to the pipework being overwhelmed by fluvial / surface water flooding as shown on the related maps in these supporting studies.</p> <p>The recent National Emergency Phone Alert Test on 23 April 2023 failed to reach my mobile phone.</p> <p>It is likely, indeed , that the policies and strategies on Local Plans may be in part in conflict with those of other national documents. This should not be regarded as a criticism of either documents which are the result of discrete and separate processes. However it is crucial to overall planning and delivery of all “joined up” development that ALL such areas of conflicting interests are identified and given priorities to enable efficient evaluation of pre-development options prior to formal applications for statutory consents. A Local Plan may be primarily and rightly focused on local issues. These may be secondary to those of wider / national interests</p> <p>On matters of flood risks, life safety and related property damage it is reasonable to acknowledge raised surface water levels in any lower river basin catchment areas may be the result of issues outside of the Local Plan zone. This needs to be transparent in Local Plan documents and related processes. It is not.</p> <p>A “joined up “ approach is required and this appears not to have been done adequately in the current drafts.</p>	<p>This new Local Plan needs to adopt an holistic overview to flood risks and their causes in the Borough both from within and externally beyond the Borough. It appears inadequate to do so.</p>
333	David Wilson, <b>Thames Water</b>	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy)	Yes	Yes	Yes	<p><b>Policy 8 - Flood Risk &amp; Sustainable Drainage Comments</b></p> <p>We support the reference to flooding from sewers in Policy 8. We also support supporting paragraphs 16.73-16.75 in relation control of surface water to public sewer.</p> <p>The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". We therefore support the reference to sewer flooding in Policy S8.</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p>	

						<p>Flood risk policies should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the London Plan drainage hierarchy (Policy SI 13). It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p> <p><b>Policy 8 Part K – Basements in areas of Flood Risk</b></p> <p>Thames Water’s main concerns with regard to subterranean development are:</p> <p>1) The scale of urbanisation throughout London is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water’s sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network.</p> <p>2) By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows.</p> <p>We therefore support paragraph 16.87 which requires basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device as this is in line with our previous comments.</p>	
334	Nikki Nicholson, <b>Surrey County Council</b>	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy)				<p><b>Flooding</b></p> <p>We support part 14 of policy 8 which states that applicants will have to demonstrate that their proposals take into account the River Thames Scheme and demonstrate how the current and future requirements for flood defences have been incorporated into the development. We also note the references to the River Thames Scheme in the Infrastructure Delivery Plan. Surrey County Council is joint applicant with the Environment Agency for the River Thames Scheme. This is a Development Consent Order scheme to reduce flood risk in communities and includes new control gates being installed at the existing weirs at Sunbury in Elmbridge Borough, Molesey in Elmbridge Borough/the London Borough of Richmond and Teddington in the London Borough of Richmond. The River Thames Scheme will be making their own representation [See comments under Zoe Chick, <b>River Thames Scheme</b> in this schedule].</p>	<p>We would suggest that policy 8: flood risk and sustainable drainage could be shortened and made more concise through using links and references to the NPPF.</p> <p>We would suggest that further reference is made to the River Thames Scheme in the supporting text for policy 8.</p>
335	Zoe Chick, <b>River Thames Scheme</b>	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy)				<p>The RTS is pleased to see that, in terms of flood defences, applicants will have to take into account the River Thames Scheme.</p> <p>The RTS would like to see the council’s support for the RTS embedded in Policy 8 itself, or in the supporting text. This is so that it is recognised that the RTS is an important project providing flood resilience alongside biodiversity, public open space, and active travel improvements. In addition, it would be beneficial to replicate the below text in the evidence base in documents such as the Infrastructure Delivery Plan. We anticipate that the RTS will be operational in 2030.</p> <p>[See also comment 36 with the background to the RTS and comment on the Policies Map]</p>	<p><b>Recommended action:</b> Additional text could be added to Policy 8 or in the supporting text which states:</p> <p><i>The Council supports proposals for strategic flood alleviation measures (and associated enabling works), including the emerging flood alleviation measures at Teddington and Molesey weirs, as part of the wider River Thames Scheme.</i></p> <p><i>The project is designed to significantly reduce the risk of flooding by creating a new river channel in two sections, totalling over 5 miles (8.5 km) alongside the Thames in Runnymede and Spelthorne, as well as increasing capacity at Sunbury, Molesey and Teddington weirs. These proposed works will increase the capacity of the Thames through Surrey and south west London, reducing the risk of flooding to over 11,000 homes and 1,600 businesses. Alongside the channels there will be large areas of green open space, new foot and cycle paths, and habitat creation. The River Thames Scheme will provide health benefits to communities as well as opportunities for tourism, recreation and leisure.</i></p>
336	Smruti Patel (Avison Young), <b>Avanton Richmond Developments LTD</b>	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy)		No	Justified; Consistent with national policy	<p>Draft policy 8 is not in accordance with national policy, not in general conformity with the London Plan, nor justified. Part A of draft policy 8 requires that a sequential approach is taken to the layout of sites, locating development in areas at lowest risk of flooding on a site. We note that this applies a more restrictive requirement to development than national policy and there has been no justification provided for why this is appropriate for the LBRuT. Part a of paragraph 167 of the NPPF only goes so far as requiring the most vulnerable development to be located in areas of lowest flood risk within the site, and goes on to allow consideration of overriding reasons to prefer a different location. Draft policy 8 is not in accordance with the NPPF and does not enable the consideration of site-specific circumstances. In turn, this conflicts with national and regional policy objectives to optimise the development capacity of sites. We understand that the LBRuT have prepared a Flood Risk Sequential Test (2021 and update 2023) as per page 8 of the Local Plan Publication (Regulation 19) – June 2023 version of the draft plan. These reports, which form part of the evidence base underpinning the draft plan, have not been made publicly available and it is therefore not possible to assess the evidence base against the requirements set out in paragraph 31 of the NPPF.</p>	
337	Rachel Holmes,	Policy 8 Flood Risk and				<p><b>Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) Part A</b></p>	

	<p><b>Environment Agency</b></p>	<p>Sustainable Drainage (Strategic Policy)</p>			<p>We welcome that Part A of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy) has been updated to clarify the role of policy and guidance and that it now incorporates a reference to the sequential approach. However, in our Regulation 18 consultation response, we recommended that the term ‘minimise’ be removed from Part A of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy). Row 715 of your ‘Statement of Consultation – Local Plan’ (dated June 2023) does not provide clear reasoning for not following our recommendation. We advise that the term ‘minimise’ is removed in the final draft of the Local Plan.</p> <p><b>Part B</b></p> <p>We welcome that you have taken some steps to update Part B of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy) in line with our Regulation 18 consultation response, such as by referencing the Environment Agency as well as the Lead Local Flood Authority (LLFA). However, we believe that it is still unclear that fluvial and tidal flood risk as well as surface water flood risk must be mitigated for. At present it states that applicants must address the ‘predicted 1 in 100 year Risk of Flooding from Surface Water (RoFSW) mapped depths as a minimum’. These mapped depths are not relevant for assessing and addressing fluvial and tidal flood risk. Therefore, it appears to show that only surface water flooding must be considered and addressed. Whilst the supporting paragraphs (paragraphs 16.69 and 16.70) and the SFRA highlight the specific requirements for addressing fluvial and tidal flood risk, in terms of finished floor levels and compensation, we need the policy itself to make it clear that these are required by developments too. Otherwise, developers may believe this is simply guidance and not a mandatory policy requirement. Therefore, should the tidal and fluvial mapped depths be mentioned here as well as the surface water one? Or, should the surface water depths not be mentioned here, and only be mentioned in the supporting text like the tidal and fluvial ones at present? Additionally, should the surface water aspects be moved to Part H ‘Sustainable Drainage’ to be collated all together, or is it purposefully separated into different parts of the policy? Is the ‘mitigation and resilience against flood risk’ mentioned in this section only in relation to ‘compensation’ that is mentioned, or are you wishing to address raising finished floor levels within this part of the policy too? We strongly recommend that the policy is updated to clearly demonstrate that fluvial, tidal and surface water mitigation is required, and what mitigation you are recommending. We would welcome discussing the revised wording with you, and Part B could be updated as follows:</p> <p><i>“B. To enable development, proposals must provide mitigation and resilience against flood risk as set out in the Council’s SFRA, including adequately raising finished floor levels, providing flood storage compensation and alleviation. Advice should be sought from the Lead Local Flood Authority (LLFA) and/or the Environment Agency as appropriate”.</i></p> <p>Without clarification made to the wording of Part B of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy) we would find it unsound due to it being unclear at what it is seeking to achieve and therefore it would not be effective.</p> <p><b>Part C</b></p> <p>Part C deals with safe access/egress and Emergency Planning which is not within the Environment Agency’s remit and therefore we have no comments.</p> <p><b>Part D</b></p> <p>In accordance with our Regulation 18 consultation response, we welcome that Part D has been updated to incorporate fluvial and undefended tidal flood risk as well as just surface water flood risk. We also welcome that it has been updated to reflect that the compensation requirements are not our requirements, but the requirements of policy. However, the first section of Part D references ‘fluvial and surface water flooding’ and the second part references ‘fluvial and undefended tidal flood storage compensation’. The policy should be requesting additional storage for all three sources of flooding, so it is unclear why only certain types are referenced in different parts of the policy. Additionally, whilst the policy mentions fluvial, undefended tidal and surface water flooding, it only references ‘on-site attenuation measures’ which are a way of alleviating surface water flooding, not fluvial or undefended tidal flooding. Paragraph 049 of the Flood Risk and Coastal Change PPG makes it clear that level-for-level compensatory storage is required for fluvial and tidal flooding. Therefore, we recommend that the wording is updated to reflect all three sources of flooding and to clarify all appropriate methods of compensation. Furthermore, in our Regulation 18 response we discussed the wording ‘where feasible’. Whilst we recognised that this is not very strong wording, we noted that it is challenging for developers to provide the minimum required flood storage compensation, let alone go above and beyond this, and therefore the use of ‘where feasible’ whilst not strong was useful to support discussions with developers to increase flood storage on site. It could be useful to add the requirement for developers to submit evidence to support the assessment of feasibility of providing additional storage on site. We would welcome discussing the revised wording with you, and Part D could be updated as follows:</p> <p><i>“D. Where a Flood Risk Assessment is required, appropriate measures to alleviate fluvial, undefended tidal and surface water flooding should be provided over and above the minimum flood storage compensation and on-site attenuation requirements, where feasible and justified by evidence”.</i></p> <p>Without clarification made to the wording of Part D of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy) we would find it unsound due to a lack of clarity of what additional flood storage/attenuation and for what sources of flood risk is being sought and so is likely to not be effective. Also, it is in conflict with Paragraph 049 of the Flood Risk and Coastal Change PPG.</p> <p><b>Part E</b></p>	
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					<p>Once the wording for Part D is updated to provide clarity on what it is trying to achieve, it is unclear what Part E would deliver above this. This is because it appears that both Parts D and E are trying to secure additional flood storage and attenuation on-site. It is unclear what additional aspects Part E is aiming to secure above Part D. Please clarify the intent of Part E of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy)</p> <p><b>Part I &amp; J – Flood defences</b></p> <p>We welcome that Part I 3 of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy) and the supporting text has been strengthened as recommended in our Regulation 18 consultation response. This includes clarifying the specific set back distances required, that the set back distance required on site may be greater than these distances, and removing ‘where possible’ in favour of requesting evidence to justify the set back proposed. Additionally, we welcome that our Flood Risk Activity Permits and the Metropolis Management Act have been referenced in the supporting text, paragraph 16.83 and 16.81 respectively.</p> <p>We also welcome that Part I 4 of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy) has been strengthened as recommended in our Regulation 18 consultation response, by including reference to not permitting new, and replacing existing, active flood defences with passive flood defences.</p> <p><u>Updated Thames Estuary 2100 Plan (Thames Estuary 2100 (TE2100) - GOV.UK)</u> – since the Regulation 18 Local Plan Consultation, an updated version of the Thames Estuary 2100 Plan has been published. Some of the major changes since the last plan have been summarised in our ‘Major updates to the Thames Estuary 2100 from 2012 to 2023’ guidance (<u>Major updates to Thames Estuary 2100 from 2012 to 2023 - GOV.UK (www.gov.uk)</u>). This includes bringing the first milestone for raising defences forward, from 2065 now to 2050.</p> <p>Part J of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy) states that ‘In addition, in line with the requirements of the Thames Estuary 2100 Plan, developments adjoining the River Thames must maintain and where necessary enhance or raise flood defences to the 2065 statutory level as set out in the TE2100 Plan (or show how they could be raised in the future), demonstrating that they will continue to provide adequate flood protection for the lifetime of the development’. Therefore, the date referenced is no longer correct. Additionally, for most developments they must consider the 2050 (previously 2065) and 2100 epochs. The Thames Estuary 2100 Plan will be updated regularly throughout the Local Plan’s lifetime, so for longevity of the policy, we recommend the policy is returned back to not referencing specific epochs, but recommends that development is in line with the Thames Estuary 2100 Plan recommendations.</p> <p>We strongly recommend that Part J is updated as follows: <i>‘In addition, in line with the requirements of the Thames Estuary 2100 Plan, developments adjoining the River Thames must maintain and where necessary enhance or raise (or demonstrate how they could be raised in the future) flood defences to the statutory level as set out in the TE2100 Plan, demonstrating that they will continue to provide adequate flood protection for the lifetime of the development’.</i></p> <p>This could potentially make the Local Plan unsound as it is not in line with the Thames Estuary 2100 Plan.</p> <p><u>Thames Barrier &amp; fluvial flood risk</u> – The Environment Agency closes the barrier to prevent storm tides travelling up the river, and to help manage extreme fluvial flooding. We need to reduce the use of the Thames Barrier to manage fluvial flooding in this area to ensure it can safely manage tidal risk. Further information can be found in the updated plan: <u>Richmond Policy Unit: Thames Estuary 2100 - GOV.UK (www.gov.uk)</u>. Within the Thames Estuary 2100 Plan (Outcome 4: <u>What needs to be done across the estuary (outcomes): Thames Estuary 2100 - GOV.UK (www.gov.uk)</u>), the Environment Agency has made the following commitment: <i>‘Between now and 2035, the Environment Agency will work with west London communities who are protected by Thames Barrier closures during fluvial floods. Together we will put alternative flood risk management arrangements in place by 2035. From this date we will not use the Thames Barrier to manage smaller fluvial floods. This will reduce the number of closures and prolong its lifespan until an end-of-century option is in place.’</i></p> <p>We would welcome a reciprocal commitment from the London Borough of Richmond Upon Thames to work with the Environment Agency.</p> <p><b>Riverside Strategy Approach</b></p> <p>In our Regulation 18 consultation response, we recommended that the Local Plan referenced a Riverside Strategy approach to the redevelopment of riverside areas, to recognise the multiple benefits that can be achieved through flood defence works. Row 724 of your ‘Statement of Consultation – Local Plan’ (dated June 2023) states ‘comments noted’. We cannot find any reference to a Riverside Strategy in the updated plan. Whilst this does not affect the soundness of the plan, it would have been useful to have greater understanding of your reasons for not including this within the plan.</p> <p>Row 752 of your ‘Statement of Consultation – Local Plan’ (dated June 2023) states that paragraph 16.75 of the Local Plan has been updated to reference the multiple benefits flood defence works can bring. However, we cannot locate this wording within the Regulation 19 Local Plan. We recommend this is rectified in line with the Statement of Consultation.</p> <p>Whilst these recommendations have not yet been actioned, this would not affect the soundness of the plan, but they would strengthen the policies.</p> <p><b>Part K</b></p> <p>As noted in our Regulation 18 consultation response, we welcome that the policy is stronger than our own stance, that we hold consistently across the tidal Thames, on basements in tidal flood zones. We welcome that the table formatting</p>	
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							<p>errors have been corrected. We also welcome the addition of information regarding basements and flood defences within the table.</p> <p><b>Part L – Climate change allowances</b></p> <p>Our Regulation 18 Local Plan consultation response noted that whilst it was commendable to require developments to consider a higher climate change allowance than required through the gov.uk guidance (<a href="#">(Flood risk assessments: climate change allowances - GOV.UK (www.gov.uk))</a>), it may be difficult to achieve in practice. We therefore welcome that you have removed the requirement for all developments to utilise the upper end allowance.</p> <p>However, Part L of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy) now states that ‘Submitted FRAs should utilise the ‘central’ climate change scenarios when implementing the climate change allowances for surface water and fluvial flood risk’. This is contrary to the gov.uk climate change guidance, as depending on the flood zone and the vulnerability classification, developments should utilise different climate change allowances. For example, a more vulnerable/less vulnerable/water compatible development in flood zone 3a should utilise the central allowance, but essential infrastructure development in flood zone 3a (or flood zone 3b) should utilise the higher central allowance. There is also additional information within the guidance on the climate change allowances that should be utilised for different scenarios. At present, Part L of the policy suggests that an essential infrastructure development in Flood Zone 3 only needs to consider the central allowance, which is contrary and more lenient than the national guidance. Therefore, Part L of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy) should be updated to reflect the gov.uk climate change allowances guidance. If this is not updated, we would consider the policy unsound as it is contrary to national guidance.</p>	
338	Rachel Holmes, Environment Agency	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy)					<p>As recommended in our Regulation 18 response [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 730 in relation to Policy 8], where feasible, SuDS should incorporate above ground features that are designed to maximise their ecological and aesthetic value and improve water quality. Any outfalls should be via open flow routes that have minimal impact on the receiving watercourse. We recommend that the policy is updated to reflect these additional requirements.</p> <p><b>Riverbanks</b></p> <p>The requirement for a 16-metre buffer zone from a tidal flood defence and 8 metres for other main rivers should acknowledge the multiple benefits of undeveloped river buffer zones, including the benefits for biodiversity and efforts to achieve objectives under the WFD.</p> <p>As suggested in our Regulation 18 response, there should be an emphasis on working with natural processes to reduce the risk of flooding. Examples include using soft engineering approaches to bank protection works on the River Thames wherever possible, which would provide multiple benefits for flood alleviation, biodiversity and helping watercourses achieve good ecological potential under the requirements of the WFD.</p> <p>We acknowledge that this ethos is referenced within the supporting text in paragraph 16.81 stating ‘The Council encourages the return of currently engineered riverbanks to a more natural state where this is possible’, however, we strongly recommend this is moved into the main policy box of Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) or Policy 40 - Rivers and River Corridors. Not only should the local plan encourage the return of engineered riverbanks to a more natural state, but it should also be opposed to new proposals to engineered riverbanks in order to make the policy more effective.</p> <p>We have previously suggested wording to make this policy more effective: “Engineered river channels are one of the most severe examples of the destruction of ecologically valuable habitat. Proposals for hard engineering approaches to riverbank protection, such as sheet piling, will be discouraged. Soft engineering approaches should be used wherever possible.”</p> <p>In paragraph 16.74, more emphasis is needed on green alternatives for porous surfaces, including but not limited to grass, (native) trees, living walls, living/biodiverse green roofs etc. These not only provide excellent interception and reduced discharge rates but help to filter pollutants from entering the watercourse. This subsequently has an advantageous impact on Policy 9 – Water Resources and Infrastructure (Strategic Policy).</p> <p>We are pleased to see references to natural flood management within the evidence base within paragraph 16.80 and the requirement for development to be set back within paragraph 16.83.</p>	
339	Rachel Holmes, Environment Agency	Table 16.4					<p><b>Table 16.3 [now 16.4] Flood Zones, Restrictions and Requirements</b></p> <p>We welcome that our Regulation 18 consultation response recommendation of clarifying the term ‘no intensification of land use’ has been incorporated into the Flood Zone 3b section of Table 16.4 Flood Zones, Restrictions and Requirements and the supporting text in Paragraph 16.65.</p>	
340	Rachel Holmes, Environment Agency	Paragraph 16.80					<p><b>Additional comments – multiple benefits and interconnected issues</b></p> <p>We welcome that, in line with our Regulation 18 consultation response recommendation, that paragraph 16.80 supporting text to Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy) includes a reference to Policy 40 – ‘Rivers and Corridors’.</p>	
341	Rachel Holmes, Environment Agency	Paragraph 16.83					<p><b>Additional comments – Flood Risk Activity Permit requirement</b></p> <p>We welcome that, in line with our Regulation 18 consultation response recommendation, a reference to our Flood Risk Activity Permit (FRAP) requirements has been included within section 16.83 of the supportive text to Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy).</p>	
-	Victoria Chase (WSP), The Boathouse	Policy 8 Flood Risk and Sustainable	No	No	No	Positively Prepared; Justified;	[See comment 470 in relation to EA requirements for a site riverward of the Thames tidal statutory flood defence line]	

	Twickenham Ltd	Drainage (Strategic Policy)			Effective; Consistent with national policy	
-						<b>Policy 9. Water Resources and Infrastructure (Strategic Policy)</b>
342	James Stevens, Home Builders Federation	Policy 9 Water Resources and Infrastructure (Strategic Policy)	No		Justified	<p><u>Part D of the Policy is unsound because it is unjustified. The Council has made policy that is unsupported by evidence. It requires applicants for residential development to rectify matters that are outside of its control. The policy is unreasonable.</u></p> <p>Part D of the policy states:  D. New major residential and major non-residential development will need to provide information that shows there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development.  Parts E, F and G stipulate more specific requirements.  The policy raises fundamental issues regarding the soundness of the plan as a whole and whether it can be delivered. Applicants for development are not providers of water services, and therefore the requirement of this policy cannot be delivered by applicants. Consequently, the plan as a whole could be unsound if Thames Water is unable to provide developments with water services.  It is necessary to examine whether the evidence supports the requirements of this policy.</p> <p>-----</p> <p>Thames Water is required to publish a Water Resources Management Plan (WRMP) for its area of operation. This is a statutory document, that is approved by the Environment Agency and then by Defra. The last WRMP was published in 2019 and has been approved by government. These plans cover a period of five years but are reviewed annually. The need for these plans to be published is a requirement of legislation. As the Government guidance states, the duty to prepare and maintain a WRMP is set out in sections 37A to 37D of the Water Industry Act 1991. Companies must prepare a plan at least every 5 years and review it annually.  The Government guidance can be read here:  <a href="https://www.gov.uk/government/publications/water-resources-planningguideline/water-resources-planning-guideline">https://www.gov.uk/government/publications/water-resources-planningguideline/water-resources-planning-guideline</a>  The Government guidance continues, saying that in these plans water companies must forecast water supply and demand over at least the statutory minimum period of 25 years. If companies forecast a deficit they should consider:</p> <ul style="list-style-type: none"> <li>• supply-side options to increase the amount of water available to the water company</li> <li>• demand-side options which reduce the amount of water customers require</li> </ul> <p>In the section dealing with forecasting, the guidance states:  <i>A WRMP must set out how you intend to maintain the balance between supply and demand for water during the planning period. The planning period should be appropriate to the risks your company faces, but must cover at least the statutory minimum of 25 years. It may be appropriate, depending on the challenges and risks in the relevant regional plans, for you to plan for the next 50 years. This is to ensure your plan identifies the right solutions to meet future pressures. WRMPs must show how you will manage and develop water resources so that you meet your obligations in relation to supplying water and the environment.</i>  The guidance advises that water companies engage with the makers of regional plans (like the London Plan) and local plans, among other things, to understand future development needs that may create further demands for water services.  The WRMP 2019 identified no issue with the ability of water companies to meet the needs of the planning system. See the Thames Water WRMP 2019. The Executive Summary can be read here:  <a href="https://www.thameswater.co.uk/media-library/home/about-us/regulation/waterresources/technical-report/executive-summary.pdf">https://www.thameswater.co.uk/media-library/home/about-us/regulation/waterresources/technical-report/executive-summary.pdf</a>  The WRMP 2019 identifies tensions but has planned various measures to ensure an adequate a supply of water. See pages 17-19 of the Executive Summary for the discussion about how Thames Water has considered future housing growth.  Water Companies are under a legal duty to provide water and sewerage services to new development. Section 37 of the Water Industry Act 1991, as amended by the Water Act 2014 imposes a general duty to maintain the water supply system. It states:</p> <p>-----</p> <p>(1)It shall be the duty of every water undertaker to develop and maintain an efficient and economical system of water supply within its area and to ensure that all such arrangements have been made—  (a) for providing supplies of water to premises in that area and for making such supplies available to persons who demand them; and  (b) for <u>maintaining, improving and extending the water undertaker’s water mains and other pipes</u>, as are necessary for securing that the undertaker is and continues to be able to meet its obligations under this Part.  (2)The duty of a water undertaker under this section shall be enforceable under section 18 above—  (a) by the Secretary of State; or  (b) with the consent of or in accordance with a general authorisation given by the Secretary of State, by the Director.</p>

					<p>(3) The obligations imposed on a water undertaker by the following Chapters of this Part, and the remedies available in respect of contraventions of those obligations, shall be in addition to any duty imposed or remedy available by virtue of any provision of this section or section 38 below and shall not be in any way qualified by any such provision. The same comments apply in relation to Water Companies being statutory consultees to the local plan process. Section 37A introduced by the Water Act 2014, requires companies to prepare water resource plans covering a 5-year period. As such, these plans should have regard to land allocations in local plans. Section 94 Water Industry Act 1991 imposes a duty on all sewerage companies to effectually drain their area and to provide 'effectual' wastewater treatment, including compliant treated effluent quality standards meeting EU Directive and domestic legislation. Moreover, when introducing their charging rules in April 2018 Ofwat confirmed, in unequivocal terms, that house builders are not required to fund improvements at wastewater treatment works. This was taken directly from the statutory guidance issued by Defra to Ofwat and dated January 2016. Section 94 of the Water Industry Act 1991 (as amended by the Water Act 2003) imposes a general duty to provide a sewerage system. To quote:</p> <p>(1) It shall be the duty of every sewerage undertaker—</p> <p>a) to <u>provide, improve and extend such a system of public sewers</u> (whether inside its area or elsewhere) and so to cleanse and maintain those sewers and any lateral drains which belong to or vest in the undertaker as to ensure that that area is and <u>continues to be effectually drained</u>; and</p> <p>b) to make provision for the emptying of those sewers and such further provision (whether inside its area or elsewhere) as is necessary from time to time for effectually dealing, by means of sewage disposal works or otherwise, with the contents of those sewers.</p> <p>(2) It shall be the duty of a sewerage undertaker in performing its duty under subsection (1) above to have regard—</p> <p>a) to its existing and likely future obligations to allow for the discharge of trade effluent into its public sewers; and</p> <p>b) to the need to provide for the disposal of trade effluent which is so discharged.</p> <p>(3) The duty of a sewerage undertaker under subsection (1) above shall be enforceable under section 18 above—</p> <p>a) by the Secretary of State; or</p> <p>b) with the consent of or in accordance with a general authorisation given by the Secretary of State, by the Director.</p> <p>(4) The obligations imposed on a sewerage undertaker by the following Chapters of this Part, and the remedies available in respect of contraventions of those obligations, shall be in addition to any duty imposed or remedy available by virtue of any provision of this section or section 95 below and shall not be in any way qualified by any such provision.</p> <p>(5) In this section "trade effluent" has the same meaning as in Chapter III of this Part.</p> <p>In terms of wastewater, the power to connect to a public sewer is conferred by Section 106 of the WIA 1991. Section 106(1) states that the owner or occupier of any premises or the owner of any private sewer which drains premises, shall be entitled to have its drains or sewer communicate with the public sewer of any sewerage undertaker and therefore discharge foul water and surface water from those premises or that private sewer.</p> <p>-----</p> <p>The Council is entering an area governed by a separate statutory regime. It is drawing its own conclusions and making policy on a matter that is contrary to the adopted statutory WRMP. The WRMP 2019 published by Thames Water identifies challenges with water supply (potable water) but the company has identified actions it can take to ensure an adequate supply of water and waste services to support the needs of the planning system. Indeed, if it was unable to do so, it is unlikely the WRMP could have been approved by the Environment Agency and Defra. Indeed, lawfully, the Environment Agency could not have approved the WRMP 2019 if a problem of water supply and sewerage treatment had been identified (see Harris v The Environment Agency [2022]) The Council, consequently, is adopting a different view to the one Thames Water reached in 2019 – a conclusion supported by the Environment Agency and Defra. The policy is also unsound because it is unreasonable. It requires applicants to rectify issues of water services that are beyond their ability to control. Housebuilders and other developers are not, obviously, water companies. They cannot construct new reservoirs, transfer water in from other areas, reduce leaks, improve wastewater treatment works etc. Housebuilders already make payments to water companies to ensure that water companies invest to support the needs of the planning system: three billion pounds have been paid by housebuilders since 1990. This is a requirement of law. To demand that housebuilders make further payments (as Part G could require) is unreasonable. If the Council considers that there is a question with the adequacy of water supply and wastewater services for development in Richmond-upon-Thames, then that implies that the plan is undeliverable. The question of the deliverability of the allocations is essential. It will not be able to rectify these matters through policy directed at housebuilders requiring them to confirm if there is capacity. This is because if the response from Thames Water is that there is insufficient capacity housebuilders cannot solve the problem of the inadequacy of water infrastructure and services – they cannot build new reservoirs or wastewater treatment works etc. If the development requirements the Council has identified cannot be delivered owing to the inadequacy of water services then the plan must be unsound: the development needs identified cannot be delivered. Alternatively, the proper weight should be accorded to the statutory WRMP that has been published by Thames Water. This covers a period of 25 years. It identified no major issues of water supply and wastewater treatment. This statutory plan was subsequently approved by the Environment Agency and Defra. The policy should be deleted.</p>	
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343	David Wilson, <b>Thames Water</b>	Policy 9 Water Resources and Infrastructure (Strategic Policy)		No	Consistent with national policy	<p>As you will be aware, Thames Water are the statutory water and sewerage undertaker for the Borough. We support Policy 9 and supporting paragraphs 16.97-16.99 as they are generally in accordance with our previous Reg 18 representations. However, we consider that the new text needs to be relocated to the 'Water and Sewage Infrastructure' section of Policy 9.</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.</p> <p>Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater..."</p> <p>Paragraph 11 states: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:</p> <p>a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"</p> <p>Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure..."</p> <p>Paragraph 26 of the revised NPPF goes on to state: "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary..."</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>Policy SI5 of the London Plan 2021 relates to water and wastewater infrastructure and supports the provision of such infrastructure to service development.</p> <p>We therefore support the section on 'Water and Sewage Infrastructure' in Policy 9 as it is in line with our previous representations.</p> <p>In line with the guidance in the NPPF, Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies' AMP8 Business Plan will be agreed with Ofwat during 2024.</p> <p>We therefore support Policy 9 Part B as it is in line with our representations, but consider that this should be located under the 'Water and Sewage Infrastructure' heading.</p> <p>It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Local Plan should therefore seek to ensure that there is adequate wastewater and water supply infrastructure to serve all new developments and we support Policy 9 and supporting text in this respect.</p> <p>Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment &amp; Water Treatment Works upgrades can take 3-5 years. Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:</p> <ul style="list-style-type: none"> <li>• The developments demand for water supply infrastructure;</li> <li>• The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and</li> <li>• The surface water drainage requirements and flood risk of the development both on and off site and can it be met.</li> </ul> <p>We therefore support paragraph 16.98 in this respect.</p>	We support Policy 9 Part B as it is in line with our Reg 18 representations, but consider that this should be located under the 'Water and Sewage Infrastructure' section of Policy 9 (rather than the 'Water Quality' section).
344	Rachel Holmes, <b>Environment Agency</b>	Policy 9 Water Resources and Infrastructure (Strategic Policy)				<p><b>Policy 9 – Water Resources and Infrastructure (Strategic Policy)</b></p> <p>We recommend that advice on how the WFD Waterbodies within the borough can achieve good ecological status/potential, via methods such as river restoration projects and soft engineering approaches to bank protection.</p>	



						<p>In order to make this policy more effective, we recommend that the protection of the boroughs rivers and watercourses is expanded to include further details on bank protection. The use of hard engineering techniques is a specific local issue that we commonly see when responding to planning applications in the borough. We are pleased that there is now a requirement for a construction management plan under point C (4) to reduce contamination of surface or ground water, however, this policy would be more effective if this was expanded to include main rivers and watercourses.</p> <p><b>3. Water resources and quality</b></p> <p>Water resources are critical to sustainable economic growth and housing development as well as supporting the natural environment. Increasing population and a changing climate will have an impact on water resources in the future. The local plan can help to ensure that water resources are protected and, where evidence justifies, that water efficiency measures are adopted as part of regeneration and development.</p> <p>We highlighted in our Regulation 19 response that the Local Plan should recognise that The London Borough of Richmond upon Thames has been classified as an area of serious water stress and that there is limited water resource availability, along with demand and supply issues as set out in Water Companies Water Resource Management Plans (WRMP's). We highlighted in our response that we do not see any mention of this classification within the Local Plan. However, we acknowledge that within the supporting text to Policy 6 in paragraph 16.39, states that the Thames Water region has been designated to be 'seriously' water stressed which we welcome.</p> <p>We note and welcome our comments regarding water infrastructure to support growth has been address as part of the Council's Infrastructure Delivery Plan.</p>	
-						<b>Delivering new homes and an affordable borough for all</b>	
345	Hannah Bridges, Spelthorne Borough Council	Housing need and delivery				<p>It is noted that the Draft Richmond Local Plan is proposing to meet the requirement of 4,110 dwellings over a 10-year period as per the London Plan requirement, and that anticipated completions are in excess of this figure, with the latest housing Authority Monitoring Report setting out that the borough is on course to meet and exceed the strategic dwelling requirement over a 10-year period. Furthermore, the Housing Delivery Test has consistently been met and the Borough has not faced any further actions as a result. Given the anticipated exceedance of the London Plan target, we are interested to know if this surplus supply has been considered in cross boundary discussions to help address any unmet needs of neighbouring authorities, particularly those of the Greater London area.</p> <p>Whilst the Mayor of London is responsible for the overall distribution of housing need in London, we recognize that there remains a notable amount of unmet need therefore further work should be undertaken across the wider area to review the implications associated with this and to identify further capacity options to ensure this is met within Greater London.</p> <p>The emphasis on higher density development and smaller units is supported but could have implications for Surrey, since previous under-delivery in London and lack of affordable family units has added to housing pressures in Surrey districts and boroughs, with potential knock-on impacts on infrastructure.</p> <p>We note there are no site allocations proposed in close proximity to the boundary of the two authorities and also note that there is no additional need to plan for additional gypsy and traveller needs in the Local Plan.</p>	
346	Jonathan Blathwayt, GLA on behalf of Mayor of London	Housing				<p>Policy 10 of the draft Plan reflects Policy H1 LP2021 identifying a ten-year housing target of 4,110 over the period from 2019/20 to 2028/29.</p> <p>While the borough Policy 10A reflects the 10-year housing target, which we welcome, it is not clear if the borough is actually committing to meet this target by 2028/29 considering any shortfall in the preceding years within the plan period years before 2029. Para 17.7 mentions that 'meeting the higher housing target in the London Plan will be a challenge' which creates confusion if the borough is committed to meeting the 10-year London Plan housing target. Moreover, Table 17.1 doesn't specify the 10-year period of expected completions, so it is not clear if this is 10 years of the plan period or 10 years of the London Plan.</p> <p>I am pleased to note that the draft Plan confirms an indicative target of 3,639 homes from 2029 to 2039 based on identified capacity and the small sites figure in accordance with Policy H1 and paragraph 4.1.11 LP2021. However, with the Draft Plan period set to start from adoption further clarity on the total target for housing for the entire Plan period would be beneficial, this should consider any under or over supply in the time between 2018/19 and the Plan adoption date.</p> <p>The Mayor supports Policy 12 that seeks to assess applications for older person's housing in accordance with London Plan Policy H13. It is noted from para (17.36) that you have used local evidence that sets the need at 75 homes per year. This is less than half the benchmark of 155 per annum as set out in Table 4.3 of LP2021. The Plan should clearly set out how any need for older person's housing is to be met over the Plan period through both specialist housing as well as the general housing stock.</p>	
347	Suzanne Parkes, Elmbridge Borough Council	Meeting demand from outside of the Borough				<p><b>Meeting demand from outside of the Borough</b></p> <p>As a neighbouring authority, you will be aware of the development needs of Elmbridge Borough and the constraints to development including, the consideration of Green Belt. LBRT will also be aware that EBC's draft Local Plan (June 2023) sets out that our local housing need figure, as set by the Government's standard methodology, will not be met in full. Under the Duty to Cooperate, we request that LBRT continues to take into account Elmbridge's unmet housing need and informs EBC of any opportunities that arise within your Borough where our residual housing need, or part of it, could be met.</p>	

-						<b>Policy 10 New Housing (Strategic Policy)</b>	
-	Jonathan Blathwayt, GLA on behalf of Mayor of London	Policy 10 New Housing (Strategic Policy)				[See comment 346 in relation to the housing target]	
348	Duncan McKane, London Borough of Hounslow	Policy 10 New Housing (Strategic Policy)				<b>Housing Policies</b> LBH note the findings of the 2023 update to the Local Housing Needs Assessment, and the updated approach to meeting your London Plan housing target (411 dpa) and supporting the provision of affordable housing within Policies 10 and 11. [See also comment 375 on Gypsies and Travellers research] LBH will look to agree positions with LBRUT on meeting housing need through a Statement of Common Ground (SoCG) in coming months.	
349	Tim Catchpole, Mortlake with East Sheen Society	Delivering new homes and an affordable borough for all				<b>Theme: Delivering new homes and an affordable borough for all (Policies 10-16)</b> [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments – comments 744, 756, 778, 782, 787, 789, and 792 in relation to these policies] No comments on your responses.	
350	James Sheppard (CBRE), LGC LTD	Site Allocation omission - LGC site Policy 10 New Housing (Strategic Policy) Policy 11 Affordable Housing (Strategic Policy) Local Housing Needs Assessment (July 2021)	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<b>Affordable Homes</b> The adopted London Plan (March 2021) provides for a housing land supply requirement for LBRuT of 4,110 completions over a 10-year period. At a strategic level, the London-wide Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes across London per annum. Indicative ranges have been included in <b>draft Policy 10</b> in a range of broad areas. Within 'Teddington and the Hamptons', a range of 900 – 1,000 new homes have been stated. Notwithstanding <b>paragraph 17.6</b> of the Publication Local Plan that summarises the findings of the latest housing Annual Monitoring Report (November 2020), setting out that the borough is forecast to meet the strategic dwelling requirement over a ten-year period, LBRuT continues to suffer from a fundamental and longstanding under provision of affordable homes. To successfully meet the Council's draft strategic vision every avenue should be explored to ensure the delivery of these affordable homes. The Council sets out in its strategic vision that by 2039, residents will have seen the impact of delivering new homes and an affordable borough for all, with a range of affordable housing having been delivered, with a future pipeline, supporting low and middle-income residents and workers into low-cost rent and home ownership options. Specifically, targeted strategic objectives include the "maximisation of delivery of genuinely affordable housing across the borough through a range of measures, recognising the significant community benefits as a priority, and taking innovative and flexible approaches to deliver more affordable housing to meet the needs of Richmond's residents". <b>London plan Policy H1</b> sets out a range of measures that should be adopted to ensure housing targets are achieved, including for boroughs to "allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification". This is considered pertinent to the Council's significant affordable housing deficit. <b>Policy H1</b> goes on to require boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites through Development Plans, especially through sites with PTALS 3-6, or within 800m of a station or town centre boundary, and on industrial sites that have been identified through the processes as set out in <b>Policies E4, E6 and E7</b> . The potential of co-location of uses through <b>Policy E7</b> has been explored above. [See comment 401 on employment] <b>Publication Local Plan Paragraph 17.13</b> confirms the borough's affordable housing delivery challenge, stating "due to the scarcity of land in the borough and other factors it is now experiencing an acute affordable housing crisis. Not enough affordable housing is being built to help alleviate the ever-growing need. Therefore, the Council will do everything in its power to make sure over the plan period we hit the 50 per cent target". It follows therefore, that every possible option should be explored to ensure affordable homes are provided. This should include for a balanced approach to mixed-use development, whilst ensuring no-net loss of employment floorspace. <b>Paragraph 17.16</b> illustrates the strength of need still further by stating "the need for affordable housing in the borough is demonstrable, which has been evidenced by the Council's Local Housing Need Assessment (LHNA). The LHNA estimates a net annual need of 1,123 affordable rented and 552 affordable home ownership products to be provided between 2021-2039." <b>Paragraph 4.4.5 of the London Plan 2021</b> confirms that the London SHMA identifies that 65 per cent of London's need is for affordable housing. There is clearly a critical, pressing need for delivery of affordable homes in the borough, to provide for the housing needs of residents and communities within Teddington, wider Richmond and Greater London. One of the key issues that will serve to stifle future affordable housing delivery is that a such a large proportion of the Council's forecast housing delivery stems from the delivery of small sites. <b>The London Plan Table 4.2</b> confirms the large proportion of Richmond's 10-year housing target predicated on net housing completions on small sites as being 2,340. Affordable housing is very often difficult to provide on-site, as part of small site development. This often manifests in	

						<p>Payments in Lieu (PiL). Given the lack of available land to develop new affordable housing, PiL cannot easily and readily contribute to relieving the affordable housing crisis. The comprehensive development of larger sites is a tangible and effective way of delivering on site affordable housing, in locations where affordable housing is most needed. The risk of such a reliance on small sites and PiL, is that this is far less effective than providing strong provision, 'on mass', as part of larger site redevelopment.</p> <p>In addition, importantly, <b>draft paragraph 17.9</b> of the Publication Local Plan notes there is a need to retain land in employment use but goes on to concede that "there may be limited potential for enabling housing gain on employment land if proposals comply with the requirements of Policies 23 and 24". As stated elsewhere in this consultation response letter, it is strongly considered that <b>draft Policies 23 and 24</b> should include an allowance for intensification or co-location within LSIS, to provide for a mix of industrial and residential uses, in line with <b>London Plan Policy E7(B)</b>.</p> <p>Boroughs should be identifying and seeking to enable additional development capacity to supplement targets, thereby realising the true potential of brownfield housing capacity. The adopted London Plan makes it clear that making the best use of land means directing growth towards the most accessible and well-connected places. <b>Policy GG2</b> of the London Plan 2021 specifically directs the proactive exploration of potential to intensify the use of land to support additional homes and workspaces. This would involve the promotion of higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.</p>	
351	Katherine Drew, <b>The Royal Parks</b>	Policy 10 New Housing (Strategic Policy)				<p>In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again.</p> <p>[See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 745 in relation to intensification of visitors and capturing the value of development]</p>	
352	Philip Villars, PMV Planning Limited on behalf of owner of <b>Arlington Works</b>	Policy 10 New Housing (Strategic Policy)	N	o		<p><u>Policy 10 New Housing (Strategic Policy)</u></p> <p>There is a pressing need for new housing within the Borough. Rising housing targets nationally and in London has put pressure on local authorities to deliver new housing.</p> <p>There is a pressing need for new homes, particularly affordable homes, both within the borough of Richmond and across the wider housing market area of London. The London-wide Strategic Housing Market Assessment has identified a need for 66,000 additional homes per year and this is stated in paragraph 4.1.1. in the London Plan.</p> <p>The Regulation 19 version of the plan sets out that the Borough's ten-year housing target is 4,110 homes and that the Council will need to exceed the <b>minimum</b> dwelling requirement. This equates to a minimum of 411 dwellings per annum (dpa).</p> <p>The council published its most recent Authority Monitoring Report (AMR) – Housing in March 2023. This set out that that only 164 residential units were delivered in 2021/2022, representing a shortfall of 247 homes (- 40%) against the required 411 dpa which represented the lowest number of completed units in the Borough in over 10 years.</p> <p>The council published its Local Housing Needs (LHN) Assessment in December 2021. The Assessment provides an analysis of the projected future housing need within the Borough and sets out that the actual housing need is 673 homes per annum as evidenced in paragraph 4.53. This represents an additional 262 dpa above the London Plan target. The Council should increase its housing target to better align with the LHN figure.</p> <p>This will ensure that the Plan is using the most up to date evidence and will confirm that the Council is committed to positive plan making.</p>	
353	Suzanne Parkes, <b>Elmbridge Borough Council</b>	Policy 10 New Housing (Strategic Policy)				<p><b>Policy 10 – New Housing (Strategic Policy)</b></p> <p>EBC's notes that the target set for LBRT by the London Plan is 411 homes per annum (4,110 homes in the ten-year housing target) and that Policy 10 'New Housing', states that LBRT will seek to exceed this taking into consideration other Local Plan policies.</p> <p>EBC welcomes this as well as the inclusion of indicative targets in the broad areas of the Borough. Nevertheless, linked to the Site Allocations, EBC's still considers that it would be useful if, within each of the allocations, the indicative number of units to be provided is set.</p> <p>We note that an 'expected implementation timescale' for each allocation has been added since the Pre-Publication Regulation 18 Consultation (December 2021) which is considered to be a useful addition.</p>	
354	James Stevens, <b>Home Builders Federation</b>	Policy 10 New Housing (Strategic Policy)	N	o	Justified; Consistent with national policy	<p><u>The policy is unsound because it is contrary to national and London Plan policy.</u></p> <p>The Council has set a housing requirement for only ten years, although the Plan is intended to operate over 15-years according to para. 2.21 in the Local Plan.</p> <p>Although the London Plan set a total requirement for the ten years covering the period 2019/20 to 2028/29, London Plan policy H1 does expect boroughs to set requirements for plan periods that extend beyond this. Richmond-upon-Thames is required to provide 4,110 homes by 2028/29. For years that extend beyond this date, the London Plan advises drawing upon evidence of land supply, including evidence in the SHLAA that was produced to support the London Plan, and also rolling-forward the small sites assumption.</p> <p>The Council must clarify its plan period. Assuming the plan will operate for the period 2025 to 2040, it must set a housing requirement for this period. This could be an annual average of 411 homes per year for each year the plan is intended to operate over. This is an approach adopted by several other London boroughs.</p> <p>The GLA SHLAA 2017 supporting the London Plan identifies the following phases:</p>	

**Table 4.8 – SHLAA phasing periods**

Phase 1	Phase 2	Phase 3	Phase 4	Phase 5
2017/18 to 2018/19	2019/20 to 2023/24	2024/5 to 2028/29	2029/30 to 2033/34	2034/5 to 2040/41

Phases 4 and 5 would cover the plan period after 2028/29 if the plan runs for 15 years from 2025. Appendix A to the SHLAA 2017 identifies addition large site capacity in London across the five phases that were assessed by the GLA. This capacity is documented in Table 10.1 on page 193 of the SHLAA 2017. The figures for Richmond-upon-Thames for phases 4 and 5 are:  
Phase 4 - 701  
Phase 5 – 164

With the small site allowance in addition to this of 234 dwellings a year, or 2340 over ten years, this would suggest a total potential supply for the years 2025/26 to 2040/41 of 3,205 homes, or 320 dwellings a year. However, given the strategic scale of the undersupply across London as a whole compared to need – the overall need is for 66,000dpa but London only has capacity of 52,000dpa - we recommend rolling-forward the overall annual average of 411 dpa which will include the small sites target of 234dpa. This may be a temporary option in any case until a new edition of the London Plan is published.

In contrast to this, we note that the Council considers the figure after 2029 to be 3,639 homes or 306dpa – see para. 17.1 of the Plan. Presumably the Council’s figure takes into account what has been delivered against the London Plan requirement since 2021/22 – the date the London Plan was adopted. What remains unclear is the length of the Plan – the years it is intended to operate over. If the plan is to operate until 2040 an annualised requirement of just 306dpa would be too low relative to the extent of London’s housing needs and the increasing problems of affordability. This would not be sound. This is why the annual average figure should be used for every year that the Plan is in operation. Needless to say, any undersupply accrued since the London Plan target came into effect in 2019/20 should be provided for and delivered by 2028/29 if possible, in line with the expectations of the Mayor of London. It is possible that any housing undersupply could be provided for in the period after 2028/29 although this would not be ideal as this would merely defer addressing very real and urgent housing needs as expected by the London Plan. We understand that the Mayor of London is keen for the full requirement to be delivered by 2028/29 and regards the base date for delivery against the London Plan by the boroughs to have been 2019/20 regardless of when the London Plan was adopted.

What is the annual average housing requirement over the plan period?  
This is currently unclear but it is necessary to define this for monitoring purposes and the calculation of the five-year land supply (assuming this is still needed). It may be 411dpa up to 2028/29 and 306dpa thereafter, but it will depend also on the extent of any backlog, or over-delivery.

Housing trajectory  
The housing trajectory on page 215 only runs up to 2030 / 31. If the Plan is expected to operate for a longer period than this (as is required by the Framework) then the Council should prepare a trajectory for the full plan period.

Stepped delivery  
The stepped trajectory is unsound because it is unjustified and contrary to the London Plan  
The proposal to increase delivery gradually, as illustrated in the trajectory, and explained in the text at para. 17.5 is unsound. The London Plan expects the requirement for 4,110 homes to be delivered by 2028/29. However, we recognise that by the time the plan is adopted – probably in early 2025 – the Council anticipates providing more completions than the annual average rate of 411dpa. In 2024/25 completions are expected to reach 552. Notwithstanding this, a stepped trajectory should not be necessary in the case of Richmond. The housing requirement for Richmond is the second lowest in Greater London (the City of London has the lowest). Delivering these homes in an affluent borough where housing need is high, should not be an obstacle, irrespective of the pandemic (the housing market was extremely active all through the pandemic) and current market uncertainty.

355	Summer Wong (RPS), <b>Notting Hill Genesis</b>	Policy 10 New Housing (Strategic Policy) (p.213-214)	No	N	N	Positively Prepared; Justified; Effective; Consistent with national policy	<b>Policy 10 New Housing (Strategic Policy) (p.213-214)</b> We support Policy 10’s commitment to exceed the borough’s ten year London Plan housing target of 4,110 homes, particularly the delivery of 900-1,000 units in the Teddington and the Hampton area. The supporting text in <b>Paragraph 17.9</b> states that the housing target delivery against the borough target is capable of being met without the release of employment land, although there may be limited potential for enabling housing gain on employment land if the proposal complies with the requirement of Policies 23 and 24. However, none of the draft Site Allocations (p.32-179) include indicative housing capacities and as such, it is not clear how the Council is proposing to meet the housing target set in Policy 10. The proposed development at St Clare Business Park for 100 residential units and replacement commercial floorspace (ref: 22/2204/FUL) in the Hampton Hill would contribute towards the borough’s housing target.	<b>Recommended Amendment</b> The St Clare Business Park site should be identified formerly in Policy 10 and Section 6 Place-Based Strategy for Hampton & Hampton Hill in that it would contribute towards the housing targets in Teddington and the Hampton area.
356	Councillor Niki <b>Crookdake</b> , Green Party Councillor for Mortlake & Barnes Common	Policy 10 New Housing (Strategic Policy)				<b>b. Reasons for the proposed amendment - 1</b> 1,900-2,100 homes are anticipated in the Local Plan within 1 mile of Chalker’s Corner, however current forecasts are at least 25% higher, with at least 2,800 new homes anticipated to be built in this locality. The underestimate and the incorrect area identification may have contributed to the lack of infrastructure planning (particularly for Transport) as required below under NPPF 31 and local plan policy 47 (see below). In line with NPPF 34, a clear summary of the net contribution to the housing stock expected from any developments approved through the year, will enable progress against the targets set out in the Housing Needs Assessment to be	<b>2. Section 17 - Delivering new homes and an affordable borough for all.</b> Section 17 is included in pages 166-189 of the Local Plan. I have set out below extracts from this text, with suggested amendments highlighted in yellow. Richmond council appointed BNP Paribas to carry out a Whole Plan Viability Study referred to in Local Plan para 17.25 below, to ensure that developers who have to submit a Financial Viability Assessment (FVA) as part of their planning application, are able to fulfil plan objectives. At the same time, BNP Paribas, was appointed by the developers of the STAG	







							possible the 15-year target. Our initial view is that the proposed site allocations set out in the draft plan indicate that the borough has an ample supply of specific deliverable/ developable sites to meet the 15-year housing target. Therefore we recommend that the amounts set out in the table at Part B of the Policy should cover the full 15- year period in order to accord with national policy and ensure soundness. No explanation is provided in the draft policy of how the actual target set for each location in the table has been calculated, therefore these are not clearly justified by evidence. To ensure soundness (justified), the figures should be clearly evidenced and revised accordingly to reflect the evidence.	
358	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer	Policy 10 New Housing (Strategic Policy)	No	N o	N o	Positively Prepared; Justified; Effective; Consistent with national policy	Furthermore, we continue to have concerns regarding the soundness of Policies 10, 12, 13, 17, 18, 28, 38, and 45. These concerns are as set out in our representations made at the Regulation 18 stage (which have not been fully addressed in the Regulation 19 draft). We have therefore 're-submitted' these comments which should be treated as forming part of our representations to the Regulation 19 draft (enclosed at Appendix A). [See Appendix 6, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 752 in relation to: the operating period and the housing requirement, exceeding the housing target, housing trajectory and broad locations for growth]	
-	Victoria Chase (WSP), The Boathouse Twickenham Ltd		No	N o	N o	Positively Prepared; Justified; Effective; Consistent with national policy	[See comment 470 in relation to the identified housing need and The Boathouse site]	
359	Tim Humphries (Firstplan), William Grant & Sons Ltd	Policy 10 New Housing (Strategic Policy)	No	N o	N o	Positively Prepared; Justified; Consistent with national policy	[See also comment 410 on Policy 23] 4.11 <b>Draft Policy 10</b> sets the housing targets for the new plan period in accordance with the requirements of the London Plan. In this regard it identifies a 10-year target of 4,110 homes. The supporting text suggests that the current projections demonstrate that this can be delivered through optimising the potential for housing delivery on all suitable and available brownfield sites. In the light of this, in considering the use of employment land for residential use Paragraph 17.9 sets out that: <b>"There is a need to retain land in employment use, as set out in the theme 'Increasing jobs and helping business to grown and bounce back following the pandemic'. Housing delivery against the borough target is capable of being met without the release of employment land, although there may be limited potential for enabling housing gain on employment land if proposals comply with the requirements of Policies 23 and 24."</b> (our underlining)	
-							<b>Policy 11 Affordable Housing (Strategic Policy)</b>	
360	James Stevens, Home Builders Federation	Policy 11 Affordable Housing (Strategic Policy)		N o		Justified; Consistent with national policy	The affordable housing policy is unsound because it is unjustified in parts, and conflicts with national policy. The policy requires 50% affordable housing, or to be more precise, half of all habitable rooms in a development need to be provided as affordable housing. The Council has chosen not to follow the threshold approach to affordable housing set out in the London Plan. This approach was devised to incentivise the supply of more affordable homes by removing the need for a viability assessment where a minimum of 35% affordable housing was provided (and other policy requirements addressed). The Council must be in general conformity with the London Plan. While this does not imply conformity in all respects, the decision to depart from the threshold approach as described in Policy H4 of the London Plan could be considered a significant change as the policy is an important strategic device to secure more affordable homes. The consequence for Greater London of Richmond Council not supporting this policy, could be that the pursuit of 50% causes fewer homes to be provided overall as schemes are delayed or prevented by viability issues, and consequently fewer affordable homes are built. If the Council abided by the London Plan approach then this might be avoided. The London Plan threshold approach is generally regarded as a successful device in helping to increase the supply of affordable homes overall across London. House builders operating in London support it. The viability evidence demonstrates the difficulty of achieving 50% affordable housing – see tables 6.48.1 to 6.48.9 – except on garden and other underdeveloped land. Nevertheless, we recognise that schemes still come forward and completions achieved (documented by the trajectory). However, these are completions achieved against a less stringent policy context, without contending with new challenges like bio-diversity net gain and zero carbon homes (operational and embodies). Also, the time expended by applicants in negotiating a viable scheme, tends to militate against a higher rate of completions. This is supported by the evidence in the trajectory showing completions falling below the London Plan requirement since 2018/19. The Council will need to do more to support the supply of new homes on small sites. This is a strategic priority for the London Plan. Requiring that half of all habitable rooms are provided as affordable homes on minor developments (nine or fewer homes) is likely to delay or deter more small sites from coming forward. We recommend that the Council revises the plan to support the threshold approach described in London Plan policy H4.	

361	Jon Rowles	Policy 11 Affordable Housing (Strategic Policy)				<p>- Richmond Council has a very low level of affordable home delivery, one of the lowest in London. The amount delivered by development is even lower than it first appears as much of what is built is receiving grant aid from the council. I feel the inspector needs to look very closely to see if all the extra design requirements that Richmond Council is adding on top of the NPPF will result in even less affordable housing being delivered.</p> <p>- The Plan seeks to diverge from the London Plan in using the viability method for assessing the amount of affordable housing a site can deliver. This is likely to result in a much smaller amount being built as RICS surveyors will value land differently in London depending on which method the council uses to assess the viability and thus keeping with the current system will result in higher land prices being used in the calculations and correspondingly fewer affordable houses will be delivered.</p> <p>- The BNP Paribas viability assessment states there will be a 5% cost uplift in construction costs and a 15% increase in operational and embodied carbon due to the council going further than the NPPF on zero carbon (page 26). I have concerns that the extra requirements for new homes could just divert new constructions to other areas (or even onto the green belt) resulting in the urgent need for extra housing locally not being met. Or the council increases the amount of grant aid to ensure that affordable housing is not sacrificed to meet the new net zero goals?</p>	
362	Natasha Styles (The Planning Bureau Limited), McCarthy & Stone Retirement Lifestyles Ltd	Policy 11 Affordable Housing (Strategic Policy)	N o	Justified; Consistent with national policy		<p>Thank you for the opportunity to comment on the draft London Borough of Richmond Local Plan Publication Consultation, June 2023 (Publication draft). McCarthy Stone is the leading provider of specialist housing for older people in the UK.</p> <p><b>Policy 11: Affordable housing</b> <b>Policy 11, point A and B</b></p> <p>We note that Policy 11: Affordable Housing, Point A, states that <i>‘all new housing developments in the Borough should provide at least 50 per cent of the total number of habitable rooms as affordable housing on site’</i>. The policy then attempts to request greater than 50% affordable housing from points B1, B2 and B3. This is a higher requirement than the strategic target of 50% of all new homes in London to be ‘genuinely affordable’ detailed in Policy H4: Delivering affordable housing of the London Plan.</p> <p>In addition, the Local Plan Viability Assessment, BNP Paribas, April 2023 (LPVA) identifies at para 7.2 that <i>‘The results do not point to any particular level of affordable housing that most schemes can viably deliver and we therefore recommend that the 50% target be retained, and applied on a ‘maximum reasonable proportion’ basis taking site-specific circumstances into account. This reflects the Council’s current practice and also the approach in the 2021 London Plan’</i>. Requiring an ‘at least’ level of affordable housing is therefore inconsistent with the Local Plan and advice within the Councils own LPVA.</p> <p>Our representation to the Draft Local Plan pre-publication consultation [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 758 in relation to Policy 11] noted that the ‘Pre Publication Draft Local Plan (Reg 18) was not supported by a Local Plan Viability Assessment (LPVA) and reminded <i>‘the Council that the viability of specialist older persons’ housing is more finely balanced than ‘general needs’ housing and the respondents are strongly of the view that these housing typologies should be robustly assessed in the LPVA. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. “A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period”</i>.</p> <p>We are disappointed therefore, given the great need for older persons housing (discussed in our response to Policy 12) in the Borough, that the LPVA has not tested the viability of older person’s housing. We would remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that <i>“The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.....Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.”</i>(Paragraph: 002 Reference ID: 10-002-20190509).</p> <p>The Council must therefore ensure that the LPVA is updated to include the older person’s typology of sheltered and extra care housing as a minimum and re-consulted upon. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG. If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion about policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need and that the typology should be tested at the Local Plan Stage. We would direct the Council towards the Retirement Housing Groups guidance on viability testing entitled ‘A briefing note on viability prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2013 (‘RHG Briefing Note’) available from COMMUNITY INFRASTRUCTURE LEVY (<a href="#">retirementhousinggroup.com</a>), that discusses how older persons housing differs from mainstream housing. If older person’s housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the provision of much needed older persons housing.</p> <p><b>Policy 11 point G and Para 17.28 – Review Mechanisms</b></p>	<p><b>Recommendation:</b> <b>Delete Policy 11. G as follows:</b> <b><del>G. If a site proposes a non-compliant level of affordable housing and is granted permission it will be subject to detailed review mechanisms (early, mid and late stage) throughout the period up to full completion of the development, including an advanced stage review mechanism. Sites that meet the 50% target for affordable housing will not be subject to a late stage review, only an early stage review to incentivise implementation</del></b></p> <p><b>Recommendation:</b> <b>The Council should delete paragraph 17.22 and enable scheme promoters to go down the London Plan FTR to deliver affordable housing without the burden of a review mechanism as follows:</b> <b><del>17.22 London Plan Policy H5 has set out a threshold approach where if a site meets 35% affordable housing or 50% in the case of public sector or industrial land, then they will not need to submit a viability assessment at the application stage. This policy is aimed at fast tracking applications through the system that provide the threshold level without being held up by potentially protracted discussions regarding viability. Richmond’s affordable housing need is so great and the Borough has such a limited supply of major sites, using the threshold approach would have a detrimental impact on the Council achieving its goal of providing 50% affordable housing across the Borough.</del></b></p> <p><b>Recommendation:</b> Delete the following text from para 17.19: <b><del>The affordable housing provision (on-site or off-site) or any financial contribution should be calculated in relation to gross rather than net development. In London the majority of development is brownfield and does not need to be incentivised, as in many cases the building will only have been made vacant for the sole purpose of re-development, therefore the Vacant Building Credit will not apply. A flowchart outlining the policy requirements and the mechanism for assessing the contributions from individual sites is set out in the Affordable Housing SPD; including how each proposal is assessed to make an adequate contribution towards affordable housing which is directly, fairly and reasonably related in scale and kind to the development proposed. It is considered necessary to make it acceptable in planning terms, and the absence of an obligation will be considered as undermining the Council’s housing strategy and harm the provision of affordable housing in the area.</del></b></p>

					<p>Point G of policy 11 G requires sites that do not deliver 50% affordable housing to be subject to a early, mid and late stage review and for sites that meet the 50% target to have an early stage review. This is reconfirmed in para 17.28. Para 17.28 sets the early stage review at 18 months after the decision date.</p> <p>It appears that the Council intend to burden all development with a review mechanism, even a schemes is already committing to deliver 50% affordable housing. To burden development which has either already committed to delivering 50% affordable housing or has already been found to be not viable at the Local Plan stage with a review mechanism at just 18 months post planning permission is wholly inappropriate and inflexible.</p> <p>It is considered that, given the more challenging viability position that older persons housing has, this means that as currently written, all specialist housing to meet the needs of older people will have to go through the delay and uncertainty of a review mechanism. This will impact on the number of sites coming forward for much needed older persons housing which is already negligible, particularly for the middle market in the Borough.</p> <p>Housing for older people, being specialist in nature as defined by Paragraph: 010 Reference ID: 63-010-20190626 of the PPG on Housing for Older and Disabled people, is often delivered on small brownfield sites separate to housing allocations or other development sites of around 0.5 hectares. Schemes tend to be high-density flatted developments located near town centres that have around 35 to 40 units.</p> <p>Paragraph: 009 Reference ID: 10-009-20190509 of the government guidance on Viability states the following: <i>'Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies.</i></p> <p>With respect to planning obligations or s106, Para 57 of NPPF states <i>'Planning obligations must only be sought where they meet all of the following tests 26 :</i></p> <p><i>(a) necessary to make the development acceptable in planning terms;</i></p> <p><i>(b) directly related to the development; and</i></p> <p><i>(c) fairly and reasonably related in scale and kind to the development'</i></p> <p>In order to introduce such a review mechanism, there must be a clear and specific policy basis for any review mechanism being imposed in line with PPG Viability para 009 Reference ID: 10-009-20190509. A significant number of recent Planning Appeals and case law have reinforced this point.</p> <p>There must therefore be a reasonable justification for imposing such a review mechanism. <u>The requirement for a review mechanism at paragraph 17.28 is not supported by any justification, evidence, or process where specific inputs to be included within any review mechanism, could be considered in public examination.</u> This should include the consideration of variables such as trigger points, costs, land values, how surplus is split and other definitions. In addition, certain exemptions should be introduced such as to smaller sites, that are built in one phase, such as older persons housing. The Planning Inspectorate have repeatedly noted that review mechanism for smaller sites, and single-phase developments are unnecessary so this must also be a consideration.</p> <p>Requiring a small single phased site that would likely to already been found to be not viable when Planning Inspectorate have repeatedly noted that review mechanisms are unnecessary is inflexible and unreasonable and exemption should be provided.</p> <p><b>Para 17.22 – threshold approach</b></p> <p>We note that Paragraph 17.22 advises that the approach required by London Plan 'Policy H5: Threshold approach to applications' is not applicable in the Borough as <i>'Richmond's affordable housing need is so great and the Borough has such a limited supply of major sites, using the threshold approach would have a detrimental impact on the Council achieving its goal of providing 50% affordable housing across the Borough.'</i></p> <p>However, the LPVA has shown that many of the variables tested were not viable with the 50% affordable housing target. Setting a more onerous requirement than even the London Plan is not realistic and the total cumulative cost of all relevant policies will undermine deliverability of the plan and will simply require a large amount of planning application to have to be viability tested at the application stage, contrary to PPG Paragraph: 002 Reference ID: 10-002-20190509 that states <i>'The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan'</i>. The Council should note that monitoring of the London plan affordable housing delivery rates has shown that since the FTR including 35% affordable housing was introduced affordable housing delivery has infact increased not decreased.</p> <p><b>Para 17.19 - Vacant Building Credit</b></p> <p>Para 17.19 states that 'In London the majority of development is brownfield and does not need to be incentivised, as in many cases the building will only have been made vacant for the sole purpose of re-development, therefore the Vacant Building Credit will not apply'.</p> <p>However, considering the examinations in public of other London Borough plans, it is likely that this element of the policy has been introduced to the Local Plan to reflect the Draft London Plan. However, the London Plan Examination in Public: Panel Report October 2019 recommended (para 236) that this policy be deleted as it was inconsistent with national policy on Building Credit and that the departure from national policy on Vacant building Credit was not</p>	
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						justified with sufficient evidence. It does not appear that the London Borough of Richmond have any local evidence to justify the departure from national policy on Vacant Building Credit and therefore Point M should be deleted. The second section of para 7.19 should therefore be deleted as it is inconsistent with NPPF para 64 on vacant building credit and a departure from national policy guidance on planning obligations Paragraph 026 to 028 Reference ID: 23b-026-20190315. No evidence appears to have been published to depart from government policy.		
363	Neil Henderson (Gerald Eve), <b>Reselton Properties</b>	Policy 11 Affordable Housing (Strategic Policy)		No		Positively Prepared; Justified; Effective; Consistent with national policy	We wish to reiterate our comments made in Response to the Regulation 18 Consultation process, dated 31 January 2023. [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 763 in relation to Policy 11]	Policy 11, Sub Section D - Reselton welcome a balance which provides greater weight to intermediate tenure (70:30). A greater proportion of intermediate housing can often make a significant difference to the viability of a development. For example, a policy compliant approach of 70:30 may only be able to deliver 100 units of affordable housing. However, significantly increasing the proportion of intermediate to, say, 50:50, may result in a significant increase in affordable units overall e.g 140 units. This has the potential to deliver no less social rented housing but significantly more affordable housing overall. As a result it is considered there should be flexibility in the policy to allow for different tenure splits where the outcome delivers broadly the same social rent quantum but allows for a significantly greater quantum of affordable housing overall.
364	Councillor Niki <b>Crookdake</b> , Green Party Councillor for Mortlake & Barnes Common	Policy 11 Affordable Housing (Strategic Policy)					<b>b. Reasons for the proposed amendment - 2</b> The LHNA identified the growth (in absolute terms) in 3 and 4 person households and the long waiting lists for affordable family accommodation. In line with national policy, the plan should be based on proportionate evidence, which states a need for 3+ family homes and supported living to, as identified in the LHNA. In relation to the viability statement, developers actual financing costs are often very different to the generic rate, which can generate a significant uplift (if less) or reduction (if more) in actual profit. A calculation should be carried out which estimates the actual profit a developer expects to make on a scheme, so that this information can be used to inform blended profit negotiations. [See c. Relevant Policies and other evidence on housing in comment 379 on Policy 13]	<b>a. Local Plan proposed amendment – 2</b> <b>Policy 11. Affordable Housing (Strategic Policy)</b> D. Where on site affordable housing is provided on site, the Council will require an affordable housing tenure split of 70% affordable rented housing and 30% intermediate housing by habitable room... <b>with priority for 3 and 4 bed social rented family homes and supported living developments.</b> 17.25 The Council has rigorously tested their affordable housing targets to make sure that they are viable through what is called a Whole Plan Viability Study. It is confirmed that the policy compliant level of affordable housing required on sites is viable so the Council will not accept anything less. Applications submitted that provide less affordable housing than set out in policy will be rejected. The Council will in extraordinary circumstances and on a caseby case basis accept viability arguments if it can be demonstrated that the site has abnormal costs that could not be foreseen, for example infrastructure provision that could not have been foreseen at The Whole Plan Viability stage and need to be considered on a site-specific basis taking into account variations between private sales values, scheme composition and benchmark land value. The Council will only accept viability arguments once it has been confirmed that the applicant has explored with the relevant Council officers the availability and application of grant to increase or provided a better tenure of affordable housing. <b>Modelling sensitivity will be undertaken using the developer's actual cost of capital to determine more accurately the profit which they are likely to generate on the scheme. This will inform negotiations on the level of blended profit agreed on the scheme.</b>
365	Mark Knibbs (Avison Young with input from Montagu – Evans and Energist), <b>St George plc and Marks and Spencer</b>	Affordable Housing & Whole Plan Viability – Policy 11	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<b>Context – Regulation 18 Representations</b> The Regulation 18 draft of the Local Plan set a minimum 50% affordable housing to be provided. Further to this, the Regulation 18 draft of the Local Plan stated that if the minimum level of affordable housing is not provided, the application will be refused and that site specific viability information will only be accepted in exceptional circumstances. AY submitted representations setting out reasons why draft policy 11 was unsound (not positively prepared, not justified, not effective and not consistent with national policy). The points raised in our Regulation 18 representations still stand, and form part of our representations to the Regulation 19 consultation. To avoid repetition we do not repeat them in full here – please refer to Section 9 of Appendix A of this submission (specifically paragraphs 9.1-9.14 and 9.18-9.31). [See Appendix 6] Regulation 19 The supporting text to Policy 11 provides a definition of Affordable Housing. This is qualified by the requirement to be in compliance with an entirely separate document (that does not form part of the development plan). This is <b>not in general conformity with the London Plan</b> and raises procedural issues. Policy 11 requires that all new housing development should provide at least 50 per cent of the total number of habitable rooms as affordable housing on-site (except small sites); if this minimum level of affordable housing is not provided the application will be refused; and site specific viability evidence will only be accepted in exceptional circumstances. The adopted local plan has a similar 50% policy in place. This has failed to deliver the borough's objectively assessed needs for affordable housing, and there is no evidence to suggest that continuing with a similar policy will change this going forwards. Accordingly, the policy is <b>not positively prepared nor likely to be effective</b> . It is, furthermore, <b>not justified</b> by the evidence (the Local Plan Viability Assessment). As a consequence it is incapable of delivering sustainable development and is therefore <b>not consistent with national policy</b> . We set out below as tracked changes our recommendations on amendments to the Regulation 19 definition of affordable housing and Policy 11 as necessary to make them sound.	



#### Definitions for Affordable Housing

Genuinely Affordable Housing- The Council considers the following to be genuinely affordable housing products:

- Social Rent.
- London Affordable Rent.
- London Living Rent (only when delivered in compliance with the Council's Intermediate Housing Policy Statement 2019 or any further update).
- London Shared Ownership (only when delivered in compliance with the Council's Intermediate Housing Policy Statement 2019 or any further update).

#### Policy 11

##### Affordable Housing (Strategic Policy)

- A. All new housing developments in the borough should provide affordable housing in accordance with London Plan Policies H4 to H6. The threshold level of affordable housing (for the purposes of following the Fast Track Route) is set at 35%, with the exception of former employment sites and public sector sites where 50% will apply, at least 50 per cent of the total number of habitable rooms as affordable housing on site. The affordable housing being provided should be genuinely affordable for the majority of residents in the borough.
- B. A contribution towards affordable housing will be expected on all housing sites.
1. On all former employment sites at least 50% on site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.
  2. On all other sites capable of ten or more units gross 50% on site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.
- On sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out below and in the Affordable Housing SPD.
- C. Where on site provision is required, an application should be accompanied by evidence of meaningful discussions with Registered Providers which have informed the proposed tenure, size of units and design to address local priorities and explored funding opportunities, and informed the capital value of the affordable housing.
- D. Where on site affordable housing is provided on site, the Council will require an affordable housing tenure split of 70% low cost rented homes affordable rented housing and 30% intermediate housing (as per London Plan definitions) by habitable room. The intermediate housing will be delivered in line with the Council's Intermediate Housing Policy Statement.
- E. If the minimum level of affordable housing is not provided in line with Part B (1) and B(2) the application for development will be refused.
- F. Site specific viability information will only be accepted in exceptional cases, determined by the Council. Any proposals where site specific viability evidence is accepted must provide the maximum amount of affordable housing, informed by detailed viability evidence. The cost of any independent review must be covered by the applicant.
- G. If a site proposes a non-compliant level of affordable housing and is granted permission it will be subject to detailed review mechanisms (early, mid and late stage) throughout the period up to full completion of the development, including an advanced stage review mechanism. Sites that meet the 50% target for affordable housing will not be subject to a late stage review, only an early stage review to incentivise implementation.
- H. In exceptional circumstances, where affordable housing cannot practically be provided on site, or off-site provision would create a better contribution (in terms of quantity and/or quality), the Council may accept provision of affordable housing off-site in the same area.



- i. Developments involving the provision of affordable housing will be expected to achieve the same high quality standards as the private housing element of the scheme in terms of accessibility, internal space requirements, external appearance and design quality and provision of private outdoor space.
- j. The Council will not accept the loss of any existing affordable housing, as set out in Policy 14. Loss of Housing, and will expect any estate regeneration to provide the equivalent amount and tenure of affordable housing by habitable room, and where possible, achieve an uplift in provision.

**Historic Affordable Housing Delivery**

The current Local Plan, adopted in 2018, sets an average annual total new housing target of 315 homes per annum (Policy LP36), which was subsequently updated by the new London Plan (2021) to 411 homes per annum for the period 2019 onwards. Average annual new home completions in the borough over the current plan period have exceeded these annual targets, as has been the case over the past 10 years, as detailed in Table 4.1 below:

*Table 4.1 Total New Homes Completed in LB Richmond-upon Thames 2012-2022*

Year	New Build	Conversions	Change of Use	Demolitions	Other	Total Net Supply
2012/13	481	13	26	-35	0	485
2013/14	365	-21	36	-16	0	364
2014/15	65	-19	207	-12	0	241
2015/16	191	-10	357	-25	0	513
2016/17	286	-3	199	-17	0	465
2017/18	277	-8	129	-16	0	382
2018/19	234	9	205	-25	0	423
2019/20	250	-4	78	-11	0	313
2020/21	931	80	431	-77	-3	1,362
2021/22	127	27	14	-9	14	173
<b>Total</b>	<b>3,207</b>	<b>64</b>	<b>1,682</b>	<b>-243</b>	<b>11</b>	<b>4,721</b>

*Source: Department for Levelling Up, Housing & Communities (2023), Affordable Housing Supply Statistic (AHS) 2021-22 accessed 29/06/22, <https://commonslibrary.parliament.uk/local-authority-data-housing-supply/>*

The adopted Local Plan includes a similar policy requirement for 50% affordable housing (Policy LP36), as that proposed by Policy 11 of the Regulation 19 draft Local Plan. LP36 seeks to meet an identified need for 964 additional affordable homes per annum (2014-2033) identified in the borough’s 2016 Strategic Housing Market Assessment (SHMA). We note that the affordable housing need identified in the SHMA is more than double the current annual housing requirement.

Affordable housing completions over the current plan period have fallen well short of the 50% target, as has been the case over the past 10 years where on average just 47 new affordable homes have been completed per annum (10% of total housing completions), as demonstrated in Table 4.2 below.

*Table 4.2 Total New Affordable Homes Completed in LB Richmond-upon Thames 2012-2022*

Year	Affordable Home Ownership	Affordable Rent	Other Rent	Social Rent	Total
2012/13	0	19	0	14	33
2013/14	10	38	0	0	48
2014/15	3	73	0	2	78
2015/16	0	88	0	0	88
2016/17	20	35	0	0	55
2017/18	0	32	0	0	32
2018/19	29	16	0	0	45
2019/20	5	30	1	0	36
2020/21	0	24	18	0	42
2021/22	0	3	7	0	10
<b>Total</b>	<b>67</b>	<b>358</b>	<b>26</b>	<b>16</b>	<b>467</b>

*Source: Department for Levelling Up, Housing & Communities (2023), Affordable Housing Supply Statistic (AHS) 2021-22 accessed 29/06/22, <https://commonslibrary.parliament.uk/local-authority-data-housing-supply/>*

Indications are that this trend is set to continue. The planning applications for the redevelopment of the Stag Brewery Site (ref.22/0900/OUT and 22/0902/FUL) were approved by the borough’s Planning Committee on 19th July 2023.

These applications propose 1,068 new homes, with just 7.6% affordable housing.

Clearly, the adopted Local Plan’s affordable housing policy (LP36) has proven to be ineffective and has failed to meet the borough’s objectively assessed needs for affordable housing.

We recognise that much of the borough’s housing supply comes from small sites, within which it is challenging to accommodate affordable housing onsite. Nonetheless, we note that the adopted Local Plan affordable housing policy includes a provision to capture affordable housing contributions from small sites, therefore the dominance of small sites should not in principle preclude affordable housing delivery within the borough.

LBRuT’s 2021 Local Housing Needs Assessment estimates that there is an annual need for 1,123 rented affordable homes in Richmond. Unsurprisingly this has increased since the previous SHMA was undertaken in light of the historic under delivery in the borough. The Regulation 19 draft Local Plan proposes to continue with the same policy requirement as the adopted local plan. In the absence of any evidence to suggest anything to the contrary, it would be reasonable to assume that this would simply involve continuing with an ineffective policy that will fail to meet the borough’s current and future affordable housing needs.

Accordingly, our view is that the policy is unlikely to be effective.

**Alternative Policy Approach**

The Threshold Approach (set at 35%) was introduced in supplementary planning guidance by the Mayor in 2017 as a solution to address the failings of past policy approaches which have failed to deliver adequate levels of affordable housing to meet the needs of Londoners. The guidance was subsequently established as policy in the adopted London Plan (2021). As set out in detail below, evidence indicates that the shift to the Threshold Approach (set at 35%) has been effective, with the average proportion of affordable housing secured under new planning permissions granted increasing significantly since the approach was introduced.

As set out in the GLA’s Affordable Housing in Planning Applications Referred to the Mayor of London report (May 2023), the Mayor considered 157 applications at Stage 2 of the referral process in 2022. Of these, 136 applications were referred to the Mayor at Stage 2 with LPA resolution to grant consent subject to the completion of a Section 106 agreement.

As set out in table 4.3 below, 82 of the approved schemes included residential development providing a total of 46,875 residential units (Use Class C3), of which 18,043 were affordable. This is an overall affordable percentage of 38% by unit and 43% by habitable room, which is the highest number of affordable homes secured in a year since data was first collected in 2011.

*Table 4.3 - Number and proportion of affordable homes in 2022 residential applications referred to the Mayor*

No. of Affordable Units Approved	Total No. of Units Approved	Per cent of Total Units that are Affordable	Per cent of Total Habitable Rooms that are Affordable	Average Affordable per cent per Scheme (by unit)	Average Affordable per cent per Scheme (by habitable rooms)
18,043	46,875	38%	43%	41%	43%

Source: GLA’s Affordable Housing in Planning Applications Referred to the Mayor of London (May 2023)

84 per cent of referable schemes in 2022 included 35 per cent or more affordable housing (by habitable room). As set out in table 4.4 below, for each of the last four years, 35 per cent or more affordable housing has been secured in more than ¾ of referable applications.

*Table 4.4 - Schemes Providing 35 per cent or More Affordable Housing and that Follow the Fast Track Route*

Year	Total No. of Approved Residential applications	No of Schemes with 35% Affordable Housing or More (by Habitable Room)	Percentage of Schemes with 35% Affordable Housing or More (by Habitable Room)	No. of Schemes Eligible for Fast Track Route	No. of Fast Track Route Schemes	Percentage of Eligible Schemes Following the Fast Track Route
2018	99	30	30%	83	22	27%
2019	63	30	48%	55	31	56%
2020	95	73	77%	83	49	59%
2021	88	72	81%	79	48	61%
2022	82	69	84%	68	45	66%

Source: GLA’s Affordable Housing in Planning Applications Referred to the Mayor of London (May 2023)

As set out above, it is evident that the Threshold Approach (set at 35% to follow the Fast Track Route) has had a positive impact on the proportion of affordable homes being secured in London as a whole. In the context that LBRuT’s current 50% policy requirement has been proven to be ineffective, it is our view that a shift to a Threshold Approach (set at 35%) in line with London Plan Policy H5 would represent a more effective alternative.

**Viability**

					<p>The Local Plan is supported by a Local Plan Viability Assessment ('the Viability Assessment') prepared by BNP Paribas on behalf of the Council. This does not, however, provide an adequate evidence base to justify Policy 11 particularly the requirement for 50% affordable housing</p> <p>The Viability Assessment was produced in April 2023 to test the ability of developments in the borough to accommodate emerging policies in the draft Local Plan. Although the report is dated April 2023, the values and build costs appear to be based on information up to June 2022, therefore we have assumed the Viability Assessment and any assumptions within it are based on this point in time. We provide a summary of the methodology set out within the Viability Assessment and provide commentary on the contents, focusing on the appropriateness of the supporting evidence and assumptions, and any omissions within the document.</p> <p><b>Methodology</b></p> <p>The Viability Assessment utilises the residual method to calculate the residual land value (RLV) of each development. The methodology considers the Residual Land Value (RLV) of 30 development typologies, reflecting different uses, including residential, offices and industrial, at varying densities. The appraisals have been tested at 0-50% affordable housing, with the following affordable housing mixes:</p> <ul style="list-style-type: none"> <li>- 70% London Affordable Rent (LAR) &amp; 30% Shared Ownership (SO);</li> <li>- 70% LAR &amp; 30% London Living Rent (LLR);</li> <li>- 70% Social Rent (SR) &amp; 30% SO; and</li> <li>- 70% SR &amp; 30% LLR.</li> </ul> <p>The Viability Assessment has established benchmark land values (BLV) for various uses, including residential, secondary offices, secondary industrial and garden/amenity/open land/vacant garage sites, to reflect the value of the existing land prior to development.</p> <p>The appraisals compare the RLV's generated by the various development typologies with a BLV to establish whether the scheme is viable. Where the RLV of a typology exceeds the BLV, the scheme is viable. Where the RLV is no more than 10% lower than the BLV, the scheme is considered to be on the margins of being viable. Where the RLV is either negative or more than 10% lower than the BLV, the scheme is unviable.</p> <p><b>Benchmark Land Value</b></p> <p>The Viability Assessment tests four benchmark land values including:</p> <ul style="list-style-type: none"> <li>- Existing residential;</li> <li>- Secondary offices;</li> <li>- Secondary industrial sites; and</li> <li>- Garden/amenity/open land/vacant garage sites.</li> </ul> <p><b>The Viability Assessment has not undertaken any benchmark land value assessments for existing retail uses, including high street, shopping centre or retail parks, therefore the Viability Assessment cannot be used to substantiate suitable levels of affordable housing on any existing retail sites (such as Site Allocation 31 (KRP), Site Allocation 18 (Twickenham Riverside and Water Lane / King Street), Site Allocation 25 (Former House of Fraser), Site Allocation 28 (Homebase), and Site Allocation 29 (Sainsbury's)).</b></p> <p>We have summarised in the table below BNP Paribas BLV assumptions, approach and evidence alongside our comments on each benchmark land value.</p> <p><i>Table 4.5 BNP Paribas BLV assumptions</i></p>	
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Existing Use	BLV	Approach & Evidence	Avison Young Comments
Existing residential	£11.41 - £15.81m per hectare	Assumed a site coverage of 10% with an existing 2 storey building. Applied the prevailing residential sales value in each area, discounted by 20% below new build values to reflect obsolescence and outdated fittings. No premium applied, as the resulting capital values are based on market values of properties which have been sold, which already include the necessary premium to incentivise a sale.	Site coverage appears low which may understate the existing use value of residential sites. BNP Paribas appear to have used residential unit sales to establish the existing use value, which are unlikely to include a premium to incentivise a sale. A premium should be included to incentivise a sale for development, which is not typically included in residential unit sales. The MHCLG's 16 'Land Value Estimates for Policy Appraisal' indicates a value of £24.5m per hectare in Richmond upon Thames which is far higher than BNP Paribas' assumption.
Secondary offices	£12.35m per hectare	Considered MHCLG's 16 'Land Value Estimates for Policy Appraisal' published in 2020, which indicates a value of £6.27m per gross hectare in outer-London boroughs. Also considered lower quartile rents for secondary office lettings in Richmond, which will be higher than other parts of outer-London. Capitalised lower quartile rents to get to a capital value of £10.32m plus a 20% premium.	Rental & yield evidence and the adopted assumptions are not provided. Query whether evidence is borough wide or solely based on Richmond.
Secondary industrial sites	£3.28m per hectare	Considered MHCLG's 16 'Land Value Estimates for Policy Appraisal' published in 2020, which indicates a value of £4m per gross hectare in Richmond. Also considered lower quartile rents for industrial lettings in Richmond, assuming a 30% plot ratio, which comes to a capital value of £4.4m plus a 20% premium.	Rental & yield evidence and the adopted assumptions are not provided. Query whether evidence is borough wide or solely based on Richmond.
Garden / amenity / open land / vacant garage sites	£0.3m per hectare	BNP Paribas assume there is little existing use value, as the use only provides amenity to the users. Assumed that the value includes adequate incentive to owners.	No evidence provided to justify the value. No premium included to incentivise a sale for development. It is difficult to consider whether this is an appropriate assumption without having sight of the evidence.

#### Development Typologies

The Viability Assessment sets out 30 development typologies on pages 23-24 within table 4.1.1, which include the following uses at varying densities:

- Seven housing typologies ranging from 1 unit to 10 units
- Seventeen flat typologies ranging from 2 – 600 units
- One combined housing and flat typology including 20 units
- One combined residential and industrial/employment scheme including 70 residential units
- Two industrial typologies including a new build scheme and an industrial intensification scheme
- Two office typologies including a small scale office and a medium scale office

**The Viability Assessment tests a range of development typologies rather than providing any site specific testing for the draft allocation sites. Kew Retail Park is one of the largest draft allocation sites for new homes therefore we would expect the viability testing to consider this in more detail.**

The development typologies exclude any high street, shopping centre or out of town retail uses, with the exception of some ancillary retail floorspace within the flat and office typologies.

There are only two office typologies including the 'Small Scale Office' typology totalling 27,500 m2 of office space over 5 storeys, plus ancillary retail space (500m2) and a supermarket (250 m2), and the 'Medium Scale Office' typology totalling 35,000 m2 of office space over 5 storeys, plus a supermarket (250 m2). Both of these office typologies assume a large amount of office space. Based on information available on CoStar for Richmond upon Thames, we understand that the largest existing office building in the area is c. 12,500 m2, and the average office building is c. 700m2, which is well below the tested typologies. The draft site allocations don't appear to provide any areas for the proposed development

and are therefore not realistic assumptions to base the assumptions on..

#### Residential Values

The Viability Assessment has tested a range of values based on analysis of 1,576 Land Registry transactions between January 2021 and March 2022 but brought up to date using HPI.

Values range from £7,130 psm (£662 psf) to £9,880 psm (£917 psf) including 9 values sets with a 4-5% uplift between each, which have been applied to the development typologies. The highest sales values are achieved in the northeast of the Borough, and in Richmond and Twickenham. Developments in the western and south-western parts of the borough are lowest. BNP Paribas have provided a map illustrating the sales values by area. These do not appear to directly correspond with the value sets however they indicate approximate values of £9,145 in North Sheen, £9,185 in



Barnes and £9,650 towards the northeast of the borough. We note that the Viability Assessment does not include details of the residential comparable evidence within the report or appendices. For each value set BNP Paribas appear to have applied a single rate per m2 to the residential units, regardless of whether the development typology in question includes flats, houses or a combination of the two. **We would expect different rates to be applied for the flat and housing typologies.** BNP Paribas have based their value sets for each location on a variety of transactions within the borough, which will include a mix of unit types such as 1 bed flats, 2 bed terraced houses etc. This approach doesn't appear to consider the adopted unit mix, or calculate a blended rate based on the unit mix in each typology. Generally, we would expect the price per sq ft for flats to be higher than houses due to quantum size adjustments.

**Commercial Rents & Yields**

The rent and yield assumptions for the retail, office and industrial floorspace are informed by 219 lettings of similar floorspace in Richmond upon Thames recorded by CoStar between January 2020 and May 2022. For each use BNP Paribas has applied the upper quartile rent to reflect the higher rents achieved for newly build space. They have also assumed a 12 month rent free for all types of commercial floorspace. On review the rental assumptions for the commercial uses appear high and the yields appear low, in some cases the rent free also appears conservative. We have noted below a number of concerns with this approach:

- BNP Paribas have included varying rent assumptions across different areas of the borough such as Barnes/Mortlake, Richmond and Teddington, however it is unclear how these assumptions have been applied to the appraisals.
- Rents can be very sensitive and not simply applies to Richmond as a whole. As an example, high street locations will command a premium over a side road in the same location
- Yield evidence has not been provided.

**Build costs**

The Viability Assessment has sourced build costs from the RICS Building Cost Information Service (BCIS) based on June 2022 data which has been rebased to Richmond Upon Thames. The Viability Assessment utilised the 'median' build costs as a base cost and has added 10% for external works. External works and associated costs will vary for flats, houses, retail, offices and industrial uses, therefore we would expect the external allowance to be differentiated for each use.

BCIS provides cost and price data for the UK construction industry covering a range of property types based on average tender prices. For planning purposes, where site specific cost plans for a project are unavailable, BCIS provides a reasonable source of cost information.

We understand that the Viability Assessment has been undertaken at a point in time and that values and build costs will be re-assessed at the next stage of the Local Plan. We have considered the following indices to illustrate the movements in values and builds over the last 12 months and to understand how these assumptions may change.

Table 4.6 Q2 2022 - Q2 2023 Indices

Index	Q2 2022 - Q2 2023 (% change)
House Price Index All Property (Richmond Upon Thames)	1.9% (To April, latest data available)
House Price Index Flats (Richmond Upon Thames)	1.3% (To April, latest data available)
BCIS All in TPI	4.9%
BCIS General Building Cost Index	3.0%
BCIS Private Housing Construction Index	0.8%

In Richmond upon Thames residential values appear to have increased at a slower rate than build costs across the UK based on the indices noted above.

**Development assumptions**

We have summarised the remaining Viability Assessment assumptions in the table below with our comments against each.

Table 4.7 BNP Paribas Viability Assessment Assumptions





Finance:	0%	Given the recent rises in interest rates this assumption appears low. The finance rate is typically based on the LIBOR rate, which currently sits at 5.19%, plus an allowance for risk. However we note that the Viability Assessment assumptions appear to be based on data up to June 2022 when interest rates were lower.
Profit:	Private – 17.5% on GDV Affordable – 6% on GDV Commercial – 12% on GDV	Appears reasonable

For other policy requirements (such as provision of employment space, affordable workspace, biodiversity net gain & accessibility), BNP Paribas has used selected data from the base results to test the impact of emerging policies, including the following sustainability and accessibility assumptions.

Table 4.8 BNP Paribas Emerging Policy Assumptions

	Emerging Policy Assumptions
Cost uplift for operational carbon	2% of build costs for domestic and non-domestic
Cost uplift for embodied carbon	1.5% of build costs for domestic and non-domestic
Accessibility - Flats	M4(2) 1.13% (all dwellings) M4 (3b) 9.47% (10% of dwellings)
Accessibility - Houses	M4(2) 0.54% (all dwellings) M4 (3b) 23.86% (10% of dwellings)
Urban greening factor	£112.80 per m2
Biodiversity net gain	0.2% of build costs

The emerging policy assumptions noted above will evidently have a further negative impact on the viability. BNP Paribas has also tested scenarios with growth and inflation, however as noted above, build costs have been rising at a greater rate than house prices, therefore we expect these scenarios to create a more negative position. We note that at this stage, our review focuses on the base assumptions and results and does not consider these alternative scenarios in detail.

**Results**

The Viability Assessment makes the following conclusions in relation to the level of affordable housing:

*“There are significant variations in the percentages of affordable housing that can be provided, depending on private sales values, affordable housing tenure, scheme composition and benchmark land value...The results do not point to any particular level of affordable housing that most schemes can viably deliver and we therefore recommend that the 50% target be retained, and applied on a ‘maximum reasonable proportion’ basis taking site-specific circumstances into account.”*

On review of the viability appraisal results, **we note that a majority of the development typologies are unviable at 35% and above, let alone 50% affordable housing**, particularly where the existing use is residential or offices. There are exceptions to this in the case of the secondary industrial and undeveloped land/gardens, back land existing uses, which have lower existing use values and typically involve lower costs to redevelop. Realistically, the undeveloped land/gardens are very unlikely to produce land for most of the scenarios tested and therefore these are not realistic scenarios.

As noted above, 30 development typologies are tested at 9 residential value sets, with affordable housing ranging from 0-50%, which are compared against four benchmark land values. Given the Council are targeting 50% affordable housing we have commented in more detail on the results at this level below:

- All of the typologies are unviable with a **residential existing use**, with the exception of the ‘small scale office’ and ‘medium scale office’ development typologies, which only become viable in the top two tiers of residential value, which we understand have only been achieved in the northeast of the Borough, and in Richmond and Twickenham.
- All of the typologies are unviable with a **secondary office existing use**, with the exception of the ‘small scale office’ and ‘medium scale office’ development typologies, which only become viable in the top three tiers of residential values.
- A number of the typologies are unviable with a **secondary industrial existing use**, with the exception of 6 housing typologies which are viable at the lowest value set. This position changes as the residential values increase, with 26 viable typologies at the highest value set.
- A majority of the typologies are viable where the benchmark land value is **undeveloped land** given the lower costs associated with this existing use. There are a few exceptions, including 4 typologies at the lowest value set which are

						<p>unviable, including the two office typologies and the four hundred flat typology and 600 flat typology, which all become viable by the 5th value set.</p> <ul style="list-style-type: none"> <li>- Of note, the commercial typologies are based on rents and yields for c. 5 locations within the borough, however there is no indication of how these commercial value sets have been applied to the 9 residential value sets which are illustrated in the results tables.</li> </ul> <p><b>Assumptions Conclusion</b></p> <p>On review of the development assumptions there is potential for a number of these to change which may further negatively impact the viability of a new development, including the following:</p> <ul style="list-style-type: none"> <li>- Value and cost data is based on evidence up to March / May 2022 therefore changes in the market over the last year are likely to affect these assumptions.</li> <li>- No retail benchmark land value assumed.</li> <li>- Allowances for demolition and abnormal costs are excluded.</li> <li>- The finance rate is low when you consider current interest rates.</li> <li>- The contingency assumption is not referred to in the body of the report. If this has been omitted, inclusion of this will further impact the viability negatively.</li> <li>- The S106 and S278 costs are low when you consider previously agreed costs in the borough.</li> <li>- Commercial letting fees and purchasers' costs are excluded</li> </ul> <p><b>Relationship to Draft Site Allocations</b></p> <p>As set out in table 4.9 below, we have undertaken an analysis of housing site allocations. Table 4.9 lists all of the allocations, identifying if there is a corresponding site typology that aligns with the site allocation that has been assessed in the BNP Paribas viability assessment. If no, then there is no evidence to justify 50% affordable housing. [It should be noted that Site Allocations which do not support housing have been excluded from the below table as they are not relevant in this circumstance].</p> <p><i>Table 4.9 Analysis of Housing Site Allocations and Appraisal Typology</i></p>	
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Site Allocation Ref	Name	Existing Use	Site Allocation Supports Housing	Viability Appraisal Site Typology
1	Hampton Sq	Mixed: community, retail, residential, commercial	Yes	No
2	Platts Eyot	Mixed business and employment	Yes	No
4	Car Park for Sainsburys, Uxbridge Road	Out of town retail	Yes	No
5	Hampton Telephone Exchange	Telephone exchange	Yes	No
6	Teddington Telephone Exchange	Telephone exchange	Yes	No
7	Teddington Delivery Office	Royal Mail Sorting Office	Yes	No
8	Strathmore Centre	Social Infrastructure (child care services/youth offending centre)	Yes	No
9	Teddington Police Station	Police station	Yes	No
12	The Stoop	Sports stadium	Yes	No
14	Mereway Day Centre	Community use	Yes	No
15	Station Yard, Twickenham	Station car park	Yes	No
16	Twickenham Telephone Exchange	Telephone exchange	Yes	No
17	Twickenham Riverside	Mixed use	Yes	No
18	Homebase, Harworth	Out of town retail	Yes	No
19	Fulwell Bus Garage	Bus depot and community uses	Yes	No
20	Ashdale Close Telephone Exchange	Telephone exchange	Yes	No
21	Kneiter Hall	Former Royal Military School of Music – Temporary use for film making	Yes	No
22	Whitton Community Centre	Community centre and pharmacy	Yes	No
23	Ham Close	Mixed use	Yes	No
24	Cassel Hospital	Hospital	Yes	No
25	Richmond Station	Railway station	Yes	No
27	Richmond Telephone Exchange	Telephone exchange	Yes	No
29	Manor Road Homebase	Retail	Yes	No
30	Lower Richmond Road Sainsburys	Out of town retail	Yes	No
32	Kew Retail Park	Out of town retail	Yes	No
32	Kew Biobrane Plant	Former biobrane Plant – Extant care home consent	Yes	No
35	Stag Brewery	Former Brewery – Temporary consent for film production	Yes	No
36	Mortlake and Barnes Delivery Office	Royal Mail delivery office	No	No
37	Upper Richmond Road Telephone Exchange	Telephone exchange	Yes	No

As is evident from the table, there are no corresponding site typologies within the Whole Plan Viability Assessment that corresponds to the Site Allocation, therefore inadequate viability evidence has been provided to justify setting a borough wide absolute 50% affordable housing target.

**Summary**

Evidence of historic (lack of) affordable housing delivery in the borough confirms that a 50% affordable housing policy requirement has failed to deliver adequate amounts of affordable housing in the borough. Further to this, there is no evidence within the Council's evidence base documents to suggest that this will change if a 50% requirement is continued.

Evidence from elsewhere in London indicates that adopting the Mayor's Threshold Approach at 35% delivers an increase in affordable housing compared to adopting a 50% policy.

In any event, there is inadequate viability evidence to justify setting the borough wide affordable housing policy at 50%:

- All of the proposed site allocations do not correspond with any of the scenarios tested in the Viability Assessment (so there is an evidence void);
- The majority of the scenarios tested in the Viability Assessment are unviable with 50% affordable housing;



						<p>- The hypothetical scenario of the redevelopment of a retail park is not viable with 50% affordable, however is marginally viable with 35% affordable housing. There is furthermore, no justification provided for restricting access to the viability tested route to exceptional circumstances. On this basis, we consider the overall approach to the policy to be unsound on the grounds of non-conformity with the London Plan (and therefore not in accordance with national policy), it has not been positively prepared, not justified, not effective. It can be made sound by amending the policy to fully conform with London Plan Policy H5.</p>	
366	Smruti Patel (Avison Young), Avanton Richmond Developments LTD	Policy 11 Affordable Housing (Strategic Policy)				<p>Draft policy 11 requires all housing developments in the borough to provide at least 50 per cent of the total number of habitable rooms as affordable housing on site. Part E notes that where the minimum level of affordable housing is not provided, applications for development will be refused. Part F states that site-specific viability information will only be accepted in exceptional circumstances, determined by the Council. We would note that the current adopted local plan also has a 50% affordable housing provision policy in place, which has failed to deliver the borough's objectively assessed needs for affordable housing. Affordable housing completions over the current plan period average to 47 units per annum over the period of 2012-2022 (total: 467 units<sup>1</sup>). There is no evidence to suggest that continuing with a similar policy will change affordable housing delivery over the 15-year draft plan period. Accordingly, the policy is not positively prepared, nor likely to be effective. Additionally, it is not justified by the evidence (the Local Plan Viability Assessment). As such, it is incapable of delivering sustainable development and is therefore inconsistent with national policy.</p> <p><u>An Alternative Approach</u> In 2017, the Mayor of London introduced a threshold approach to affordable housing through supplementary planning guidance as a means to address the failings of past policy approaches that have failed to deliver adequate levels of affordable housing to meet the needs of Londoners. The guidance was subsequently established as policy in the new London Plan. Evidence demonstrates that the shift to the threshold approach has been effective, with the average proportion of affordable housing secured under new planning permissions granted increasingly significantly since the approach was introduced. We would therefore suggest that, in accordance with the London Plan, the LRBuT local plan maintains the threshold approach set out in policy H5 of the London Plan. Whilst the London Plan does not preclude boroughs from bringing forward policies that vary from the detail of the policies in the London Plan where locally-specific circumstances and evidence suggest this would better achieve the objectives of the London Plan and where such an approach can be considered to be in general conformity with the London Plan, no justification has been provided in the draft Plan as to why the LBRuT have deviated from the threshold approach, nor any evidence to suggest that the proposed approach would be successful in delivering the objectively assessed affordable housing need of the LBRuT. The policy is therefore not in general conformity with the London Plan.</p> <p><u>Viability</u> The draft plan is underpinned by a Local Plan Viability Assessment (the "LPVA") prepared by BNP Paribas on behalf of the Council. It fails to provide an adequate evidence base to justify draft policy 11. In the first instance we would note that, although the LPVA is dated April 2023, the value and build costs used are based on information up to June 2022. As such, the LPVA and any assumptions within it are assumed to be based on this point in time. As per the Monthly Statistics of Building Materials and Components<sup>2</sup>, the material price index for 'All Work' increased by 10.4% in January 2023 compared to the same month the previous year. This followed an increase of 11.2% in December 2022 compared to the same month the previous year. The LPVA therefore cannot be considered to be up-to-date and reflective of market signals and is therefore an unsound evidence base. As such, the draft plan has not been demonstrated to be deliverable. We note that the LPVA does not undertake site specific testing for the draft allocation sites, rather it tests a range of development typologies. It also fails to account for differences in gross development value for different typologies – i.e. houses vs. flats. The key findings of the LPVA note that: <i>"There are significant variations in the percentages of affordable housing that can be provided, depending on private sales values, scheme composition and benchmark land value. The results do not point to any particular level of affordable housing that most schemes can viably deliver and we therefore recommend that the 50% target be retained, and applied on a 'maximum reasonable proportion' basis taking site-specific circumstances into account. This reflects the Council's current position and also the approach in the 2021 London Plan"</i>. On review of the viability appraisal results, we note that a majority of the development typologies are unviable at 50% affordable housing, particularly where the existing use is residential. Draft policy 11 does not fully account for the recommendation set out by BNP Paribas in the LPVA and rather than retaining a 'maximum reasonable proportion' of affordable housing proving, taking site-specific circumstances into account, the 50% threshold is set as the minimum required amount. Additionally, viability assessments are only to be accepted for 'exceptional circumstances' therefore removing the consideration of site-specific circumstances. Site specific circumstances, particularly of allocated development sites, have not been tested as part of the LPVA and draft policy 11 does not allow them to be considered except for in exceptional circumstances. In conjunction with the variable, and significant, impact of the 50% affordable housing provision on the tested scenarios, it therefore has not been demonstrated that the draft plan, particularly the strategic policy for housing, is deliverable. The requirements of part G of the draft policy in regard to viability reviews are not consistent with policy H5 of the London Plan. This risks creating confusion for applicants and decision-makers, and conflicts with paragraph 16(d) of the NPPF. We recommend that it is amended to fully conform with policy H5 of the London Plan to ensure soundness.</p>	



							<p><sup>1</sup> <a href="https://commonslibrary.parliament.uk/local-authority-data-housing-supply/">https://commonslibrary.parliament.uk/local-authority-data-housing-supply/</a></p> <p><sup>2</sup> <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1138937/23-cs3-Construction_Building_Materials_-_Commentary_February_2023.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1138937/23-cs3-Construction_Building_Materials_-_Commentary_February_2023.pdf</a></p>	
367	Jonathan Blathwayt, GLA on behalf of Mayor of London	Affordable Housing		No	o	Consistent with national policy	<p>The Mayor welcomes LBRuTs policy to seek 50% affordable housing from residential development which aligns with Mayor's strategic target of 50% of all new homes to be genuinely affordable as set out in London Plan Policy H4A. However, as mentioned in the response to LBRuT's Regulation 18 consultation in January 2022, the policy fails to reflect the Mayor's Threshold Approach to affordable housing as set out in Policy H5 LP2021. This means the Publication Draft Local Plan as consulted on is not in General Conformity with the London Plan.</p> <p>The Threshold Approach seeks to limit those circumstances where viability evidence is required as part of residential planning proposals by providing the incentive for developers to achieve at least the minimum level of affordable housing to qualify for the Fast Track Route thereby avoiding scrutiny of viability at various stages of development. The threshold set in Policy H5 has been informed by viability testing and embeds affordable housing requirements into land values which creates consistency across London.</p> <p>The policy has been proven effective at securing affordable housing with the 2022 Annual Monitoring Report showing that 84% of all strategic applications provided at least 35% affordable housing, this represents an increase from 53% of schemes in 2018. The average rate of affordable homes per scheme was 41% of all units and 45% of all habitable rooms.</p> <p>A 50 per cent site specific target is likely to result in most residential applications following the Viability Tested Route which on average provides less affordable housing and takes longer to determine compared with Fast Track Route schemes.</p> <p>On average schemes that were referable to the Mayor that followed the Fast Track Route provided 44 per cent affordable housing in 2022, whereas viability tested schemes provided only 28 per cent. Applicants also typically seek to demonstrate the existence of 'viability deficits' through the viability assessment process and use these as a credit in viability review mechanisms which can reduce the likelihood that additional affordable housing is secured over the lifetime of the development.</p> <p>As such, in practice, there is a significant risk that the borough would secure fewer affordable homes through a blanket 50 per cent requirement than could be achieved through 35 per cent threshold for sites that are not on public or industrial land. Based on figures from the London Development Database, only 19% of housing approvals in the borough were affordable over the three years from 2019/20 to 2021/22 and this trend is likely to continue under the proposed approach. We are therefore concerned that, in reality, a headline target would achieve less than a more feasible, lower target – in effect 50% of a small number will not deliver our shared ambitions.</p> <p>There is a lack of evidence that the approach as set out in the draft Plan will deliver more affordable homes in practice than the threshold approach as set out in the London Plan has achieved. Therefore, changes to Policy 11 of Richmond's Local Plan should be made to bring it in line with Policy H5 LP2021.</p>	
368	Summer Wong (RPS), Notting Hill Genesis	Policy 11 Affordable Housing (Strategic Policy) (p.217-218)	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<p><b>Policy 11 Affordable Housing (Strategic Policy) (p.217-218)</b></p> <p>Policy 11 requires all new housing developments to provide at least 50% affordable housing, and where possible a greater proportion than 50% affordable housing on individual sites should be achieved. This draft policy is in conflict with the London Plan Policy H5 which allows for the 35% fast track threshold approach, or 50% on public sector or industrial land. In order to conform with the London Plan, Policy 11 should allow for a viability tested approach, should the affordable housing thresholds not be met.</p> <p>To ensure soundness and that the policy is justified through compliance with the requirement of London Plan Policy H5, it is recommended that Policy 11 is revised to clarify the Council's minimum affordable housing target is 35% on major schemes subject to viability, or 50% affordable housing on public land or industrial land subject to viability and identifying the fast track approach without the need for viability analysis if the scheme is providing at least 35% affordable house and tenure compliant.</p>	<p><b>Recommended Amendment</b></p> <p>Policy 11 Part A) <i>All new housing developments in the borough should provide at least <b>50% 35%</b> of total number of habitable rooms as affordable housing on site.</i></p> <p>Policy 11 Part B) Point 1) <i>On all former employment sites at least 50% on-site provision, <b>subject to viability.</b></i></p> <p>Policy 11 Part B) Point 2) <i>On all other sites capable of ten or more units gross <b>50% 35%</b> on-site provision, <b>subject to viability.</b></i></p> <p>Policy 11 Part E) <i>if the minimum level of affordable housing is not provided in line with Part B (1) and B (2) the application for development will be refused, <b>subject to site-specific viability testing.</b></i></p> <p>An additional clause should be added to Policy 11 to include what is required to comply with the fast track approach without the need for viability analysis in line with London Plan Policy H5.</p>
369	Luke Burroughs, Transport Trading Properties Limited (TTLP)	Policy 11 Affordable Housing (Strategic Policy)					<p><b>Policy 11: Affordable Housing</b></p> <p>TTLP welcomes the policy that developments <i>"should provide 50 per cent of the total number of habitable rooms as affordable housing on site"</i>. TfL Property Development is committed to delivering 50 % affordable housing (by habitable room) across its portfolio as instructed by the Mayor.</p> <p>However, policy H4 (Delivering Affordable Housing) of the London Plan identifies that public sector landowners with agreements with the Mayor can take a portfolio approach to delivering 50% affordable housing across public landholdings in London. TfL has such an agreement with the Mayor which provides the flexibility for more complex sites to come forward where they would be unviable providing the full 50% affordable housing requirement, whilst still providing a high level of affordable housing across all TfL landholdings. The policy should be altered to reflect the above.</p>	
370	Lucy Hale (Gerald Eve), St Mary's University	Policy 11 Affordable Housing (Strategic Policy), Local Housing					<p><b>Local Housing Need Assessment (LHNA) 2021</b></p> <p>St Mary's previously commented on the Local Housing Needs Assessment 2021 (LHNA) as part of the Regulation 18 Consultation [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 780 in relation to the housing needs assessment] and wish to reiterate these comments as part of these representations. The 2023 LHNA update, following the Regulation 18 consultation and the release of the 2021 Census information did not include the suggested amendments. St Mary's are in support of the</p>	

		Needs Assessment 2021 paragraphs 8.74 and 8.85					position moving forward in respect of student residential accommodation, however there are two points they wish to highlight below. <ul style="list-style-type: none"> <li>Paragraph 8.74 - since the discussions with Icen, St Mary's have undertaken further work on their projections. The figure of '893' quoted in relation to an on-site capacity increase accounting for demolition, should be '950'.</li> <li>Paragraph 8.85 - with regard to the statement "Overall, the current and future needs of the student population within LBRuT are currently being met. There is therefore no requirement to increase the overall housing need on the basis of student growth...". It should be made clear that the statement will not apply if the predicted growth in residential provision cannot be contained within existing landholdings with the support of the Council.</li> </ul>	
371	Tim Humphries (Firstplan), William Grant & Sons Ltd	Policy 11 Affordable Housing (Strategic Policy),	No	No	No	Positively Prepared; Justified; Consistent with national policy	[See also comment 410 on Policy 23] 4.12 <b>Draft Policy 11</b> relates to Affordable Housing and details the level of provision required for all developments. This policy specifically differentiates rates on sites involving former employment land from other sites.	
-	James Sheppard (CBRE), LGC LTD						[See comment 350 in relation to Policy 11 and the LGC site]	
-	Peter Thompson, National Physical Laboratory (NPL)						[See comment 132 in relation to Policy 11 and NPL]	
-							<b>Policy 12 Housing Needs of Different Groups</b>	
372	James Stevens, Home Builders Federation	Policy 12: Housing Needs of Different Groups		No			The policy is unsound as it is insufficiently supportive of housing for older people. Part B 3 of the policy refers to the London Plan and policy H13. Table 4.3 of the London Plan sets out indicative benchmarks for the supply of specialist housing for older people which have the characteristics of retirement housing for independent living, as opposed to care home accommodation which should be subject to a separate assessment. This is housing that has the characteristics of C3 use class housing. The definition of the housing to which the London Plan Policy H13 applies is set out at paragraphs 4.13.4 to 4.13.6. The London Plan requires boroughs to plan proactively to meet the identified need for older persons accommodation (para. 4.13.9). The London Plan sets an indicative benchmark figure of 155 units of housing for older people per year. The Council should include this figure in the policy its local plan. This is not a mandatory target but a figure that the Council should aim to provide to meet the needs of older people in London.	
-	Jonathan Blathwayt, GLA on behalf of Mayor of London	Policy 12 Housing Needs of Different Groups					[See comment 346 in relation to the need for older person's housing]	
373	Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common	Policy 12 Housing Needs of Different Groups					<b>b. Reasons for the proposed amendment - 3</b> As many housing schemes have been reclassified by RPs from supported to independent living as a cost saving initiative, there should be a policy preventing RPs from changing the supported living designation without agreement from the LA. In line with national policy, the plan should be based on proportionate evidence, this change would support the LHNA need to retain specialist housing. Ensuring we have sufficient key workers in the borough is essential for delivery of the Local Plan objectives and given the high housing costs in the private sector. In line with national policy, the plan should be based on proportionate evidence, this change, would support whole plan delivery. [See c. Relevant Policies and other evidence on housing in comment 379 on Policy 13]	<b>a. Local Plan proposed amendment – 3</b> <b>Policy 12. Housing Needs of Different Groups</b> 17.44 ... Where a supported or specialised residential development is agreed, RPs will require the LAs agreement before changing this designation to independent living, in line with Policy 14 to reduce the loss of specialist accommodation. 17.47 We will work with developers to encourage key worker provisions as part of the eligibility criteria for housing if demand exceeds supply, in line with NPPF 4.60.
374	Matthew Pigott (Avison Young), Star Land Realty	Policy 12 'Housing Needs of Different Groups'	No	No	No	Justified; Consistent with national policy	We write on behalf of our client, Star Land Realty, to provide representations on the London Borough of Richmond upon Thames' (LBRUT) Publication Local Plan (Regulation 19). In summary, we object to draft Policy 12 as currently drafted on the basis that it does not conform with the London Plan and there is no evidence to justify a departure. <b>Policy 12 'Housing Needs of Different Groups'</b> This representation focusses on Policy 12 'Housing Needs of Different Groups' and the need for it to reflect the London Plan (2021) and Rectory Homes High Court decision <sup>1</sup> (footnote: Rectory Homes Limited v SSHCLG and South Oxfordshire District Council [2020]). Draft Policy 12 relates to housing needs of different groups, including older persons' accommodation. Part B (1) states: <i>"All residential uses are expected to contribute to the highest priority affordable housing needs as set out in Policy 11 'Affordable Housing (Strategic Policy)', and contribute to creating mixed, balanced and inclusive communities. The highest priority is for on-site general needs affordable housing."</i>	On this basis, to comply with the London Plan (2021) and noting the Rectory Homes judgement, Local Plan policy should also exclude care homes from the requirement to deliver affordable housing to ensure compliancy and consistency with the London Plan and leading case law. The wording of Policy 12 Part B (1) should therefore be amended as follows (amendments in <b>bold</b> ): <i>"All residential uses, <b>excluding care home accommodation as defined within the Local Plan Glossary</b>, are expected to contribute to the highest priority affordable housing needs as set out in Policy 11 'Affordable Housing (Strategic Policy)', and contribute to creating mixed, balanced and inclusive communities. The highest priority is for on-site general needs affordable housing."</i> Supporting text paragraph 17.45 should also be amended to reflect this (amendments in <b>bold</b> ):

						<p>The London Plan (2021) is part of the LBRUT Development Plan. The Greater London Authority Act (1999) (as amended) states that in the case of a London borough, the Development Plan shall be in general conformity with the spatial development strategy.</p> <p>Accordingly, the proposed requirement for all residential uses to contribute to affordable housing is not in line with the London Plan (2021) and we object to the policy as currently drafted.</p> <p>Specifically, paragraph 4.13.4 of the London Plan stipulates that ‘care home accommodation’ is not subject to the requirements of Policy H13 ‘Specialist older person housing’, including the need to deliver affordable housing in line with Policies H4 and H5. This is consistent with the Rectory Homes High Court decision.</p> <p>The key consideration here is that Class C2 development ‘may’ be dwellings but equally this means they may not – ultimately this will depend on the physical nature of the development (i.e. does the development include residential accommodation in the form of dwellings as part of the primary use; or is the development non self-contained and comprises personal care and accommodation as one package) and the nature of the use (i.e. are the units sold on leasehold or freehold terms or conversely, is there no choice in care provision and associated restrictions on occupation, such that the development could not be considered to be residential accommodation).</p> <p>London Policy H13 deals with this issue by clearly defining care home accommodation separately to wider older persons’ accommodation products (extra care, assisted living etc.). The purpose of this is to avoid genuine care home accommodation, which has specific care requirements secured by planning condition and Section 106 obligations, being captured by affordable housing policies.</p> <p>At paragraph 0.0.8 of the London Plan (2021) it is confirmed that:</p> <p><i>“All Development Plan Documents and Neighbourhood Plans have to be ‘in general conformity’ with the London Plan.”</i></p> <p>Further detail is provided at paragraph 0.0.24 of the London Plan (2021), which confirms:</p> <p><i>“The London Plan does not preclude boroughs and neighbourhood forums from bringing forward policies in their Development Plan Documents or Neighbourhood Plans that vary from the detail of the policies in this Plan where locally-specific circumstances and evidence suggests this would better achieve the objectives of the London Plan and where such an approach can be considered to be in general conformity with the London Plan.”</i></p> <p>Turning to LBRUT’s draft Local Plan, this is supported by an evidence base which has been used to inform the draft policy wording. This includes a Whole Plan Viability Assessment (2023) prepared by BNP Paribas. This assessment does not clearly provide any assessment of the viability implications of draft Policy 12 on care home accommodation or other types of housing needs of different groups. As such, the locally-specific circumstances and evidence required for any departure from the London Plan (2021) has not been provided.</p>	<p>“However, as identified in the LHNA, the need for affordable homes remains substantial and is therefore a higher priority to those identified above. Where proposed residential provision does not itself meet the NPPF definition of affordable housing, affordable housing policy requirements as set out in Policy 11 Affordable Housing will be applicable to all site proposals for accommodation, <b>excluding care home accommodation</b>, considered under this policy and it is expected that schemes will be designed to accommodate the priority needs for affordable housing alongside other types of housing for specific groups. As set out in Policy 11 Affordable Housing the threshold approach to fast track applications providing lower levels of affordable provision in proposals to meet the needs of different groups, such as affordable student accommodation or specialist older persons housing, is not considered appropriate in the borough context given the significant land constraints and high level of general affordable housing need.”</p> <p>Furthermore, it is suggested that a clear definition of care home accommodation is included within the glossary which reflects the London Plan and Rectory Homes High Court Decision as follows:</p> <p><i>A care home (whereby affordable housing policies would not be applicable) would comprise an operational development that provides:</i></p> <ul style="list-style-type: none"> <li>• Personal care and accommodation provided together as a package with no clear separation between the two;</li> <li>• The person using the service cannot choose to receive personal care from another provider;</li> <li>• People using the service do not hold occupancy agreements such as tenancy agreements, licensing agreements, licences to occupy premises, or leasehold agreements or a freehold;</li> <li>• Likely CQC-regulated activity will be ‘accommodation for persons who require nursing or personal care’.</li> </ul>	
375	Duncan McKane, London Borough of Hounslow	Policy 12 Housing Needs of Different Groups				<p>LBH note the findings of LBRuT’s Research on Gypsies and Travellers (updated in 2023) and the policy position articulated at Policy 12 C).</p> <p>[See also comment 348 on housing policies]</p>		
376	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer	Policy 12 Housing Needs of Different Groups	No	N	N	<p>Positively Prepared; Justified; Effective; Consistent with national policy</p>	<p>Furthermore, we continue to have concerns regarding the soundness of Policies 10, 12, 13, 17, 18, 28, 38, and 45. These concerns are as set out in our representations made at the Regulation 18 stage (which have not been fully addressed in the Regulation 19 draft). We have therefore ‘re-submitted’ these comments which should be treated as forming part of our representations to the Regulation 19 draft (enclosed at Appendix A).</p> <p>[See Appendix 6, along with the <a href="#">Council’s Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 775 in relation to: the type of residential the policy applies to and the standards of accessible and inclusive design]</p>	
377	Natasha Styles (The Planning Bureau Limited), McCarthy & Stone Retirement Lifestyles Ltd	Policy 12 Housing Needs of Different Groups				<p>Thank you for the opportunity to comment on the draft London Borough of Richmond Local Plan Publication Consultation, June 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK. Government’s policy, as set out in the revised NPPF, is to boost significantly, the supply of housing as confirmed within Paragraph 60. The NPPF looks at delivering a sufficient supply of homes, Paragraph 62 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people.</p> <p>In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001 Reference ID: 63-001-20190626 states:</p> <p><i>“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking”</i> (emphasis added).</p> <p>Paragraph 003 Reference ID: 63-003-20190626 recognises that:</p> <p><i>“the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.”</i></p> <p>Thus, a range of provision needs to be planned for. Paragraph 006 Reference ID: 63-006-20190626 sets out:</p>	<p><b>Recommendation:</b></p> <p><b>Delete point B.1. 1.</b></p> <p><del>All residential uses are expected to contribute to the highest priority affordable housing needs as set out in Policy 11 ‘Affordable Housing (Strategic Policy)’, and contribute to creating mixed, balanced and inclusive communities. The highest priority is for on-site general needs affordable housing.</del></p> <p><b>Delete Policy 12 point B2:</b></p> <p><del>All residential uses should demonstrate how higher standards of accessible and inclusive design have been met.</del></p> <p><b>Amend Policy 12 point B. 3.</b> To ensure that housing needs are supported and that our views detailed in our response to Policy 11 Affordable Housing are translated into policy 12.</p> <p><b>B. 3.</b> Proposals which provide adaptations and alterations to enable residents to live independently and safely remaining in their existing property will be supported. Proposals for new specialist older persons’ housing will be assessed against London Plan Policy H13., <u>The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations, where it meets identified local need as set out in the</u></p>	

				<p><i>“plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.”</i></p> <p><u>Benefits of Housing for Older People</u> Older Persons’ Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.</p> <p><u>Economic</u> A report <i>“‘Healthier and Happier’ An analysis of the fiscal and wellbeing benefits of building more homes for later living”</i> by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:</p> <ul style="list-style-type: none"> <li>• ‘Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.</li> <li>• Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.</li> <li>• On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.’</li> </ul> <p>A further report entitled <i>Silver Saviours for the High Street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing</i> (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open.</p> <p>As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a ‘knock-on’ effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report <i>“Chain Reaction” The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)”</i> reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.</p> <p><u>Social</u> Retirement housing gives rise to many social benefits:</p> <ul style="list-style-type: none"> <li>• Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder</li> <li>• Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns.</li> <li>• The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living.</li> </ul> <p><u>Environmental</u> The proposal provides a number of key environmental benefits by:</p> <ul style="list-style-type: none"> <li>• Making more efficient use of land thereby reducing the need to use limited land resources for housing.</li> <li>• Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions.</li> <li>• Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.</li> </ul> <p><u>Extent of Older Person’s Housing Need</u> Para 17.33 of the Publication draft plan identifies that the needs for specialist housing for older people has been assessed by Housing LIN entitled <i>‘Assessment of need for specialised housing and accommodation for older people in Richmond’</i>, December 2021. This assessment concludes at para ‘4.02 Housing for older people (retirement housing and contemporary ‘sheltered housing’). <i>The estimated net need for specialised housing for older people to 2039 is c.1,070 units of which c.800 for sale and c.270 for social/affordable rent’ and at ‘4.03 Housing with care (extra care housing). The estimated housing with care net need to 2039 is c.420 units of which c.210 for social/affordable rent and c.210 for sale’.</i> Policy 10 identifies that the ‘Boroughs ten year housing target is 4,110 homes’. The need of specialist housing to meet the needs of older people totals 1,490 (retirement / sheltered and extra-care housing) to 2039, over a ten year period <b>this would make up almost 20% of total housing need.</b> This is a substantial proportion of housing need. <b>Given</b></p>	<p><del>Council’s Local Housing Needs Assessment, housing and commissioning strategies, including how an affordable housing contribution has been maximised. Applicants for specialist older persons’ housing should demonstrate how the design will address the needs of people with dementia and other long-term health conditions, and be informed by discussions with providers and demonstrate accordance with the Council’s commissioning and housing strategies. An Operational Management Plan will be required to secure minimum levels of care and eligibility restrictions to prioritise local needs.</del></p> <p>Delete para 17.45 <del>17.45 However, as identified in the LHNA, the need for affordable homes remains substantial and is therefore a higher priority to those identified above. Where proposed residential provision does not itself meet the NPPF definition of affordable housing, affordable housing policy requirements as set out in Policy 11 Affordable Housing will be applicable to all site proposals for accommodation considered under this policy and it is expected that schemes will be designed to accommodate the priority needs for affordable housing alongside other types of housing for specific groups. As set out in Policy 11 Affordable Housing the threshold approach to fast track applications providing lower levels of affordable provision in proposals to meet the needs of different groups, such as affordable student accommodation or specialist older persons housing, is not considered appropriate in the Borough context given the significant land constraints and high level of general affordable housing need.</del></p>
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						<p><b>the substantial need, and benefits specialist housing to meet the needs of older people brings, developers of older person's housing schemes should not be required to demonstrate need.</b> In light of the urgent need to significantly increase the delivery of specialist older persons' housing in the Borough and across Greater London, we consider that the Plan should provide a more positive framework to ensure delivery. Point B. should be amended accordingly.</p> <p><u>Accessibility</u> We note that Point B 2. States that 'All residential uses should demonstrate how higher standards of accessible and inclusive design have been met'. It is not clear if this is suggesting a higher accessibility standard than that required under Policy 13 – Housing Mix and Standards or the same.</p> <p>It is common for Local Authorities to conflate the needs of 'wheelchair users' with the needs of older people in the community. The Council are respectfully reminded that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the substantial housing needs of older people. Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. Housing particularly built to M4(3) standard may serve to institutionalise an older persons' housing scheme reducing independence contrary to the ethos of older persons.</p> <p><u>Deliverability</u> We would remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the Council's planning obligations and building requirements should therefore be robust.</p> <p>The viability of specialist housing for older people is more finely balanced than 'general needs' housing. We are strongly of the view that these housing typologies should be robustly assessed through the Local Plan process. However currently the LPVA has not assessed specialist housing to meet the needs for older people. To do so would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. <i>A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.</i> Without such a viability assessment and evidence it is difficult for the Council to justify requiring specialist provider to deliver policy requirements to a higher standard than mainstream housing when viability is potentially worse.</p> <p>The Council must therefore ensure that an up date to the LPVA is undertaken to inform the future plan. The new viability assessment must include a number of typologies that includes older person's housing and if older person's housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the delivery of much needed older persons housing. Point B.2 should therefore be deleted as it is not clear and instead rely on the requirements of policy 13 – Housing Mix and Standards.</p> <p>In addition, given our comments to Policy 11 Affordable Housing [See comment 362], and given that the Council has not yet tested the specialist housing to meet the needs of older people for viability reference to requiring developers to meet the affordable housing requirement should be deleted together with supporting paragraph 17.45 as the affordable housing requirement is not justified or consistent with national policy.</p>		
-	Andrew Miller, Strawberry Hill Residents' Association	St Mary's University future plans					[See comment 192 in relation to St Mary's University future plans]	
-	Victoria Chase (WSP), The Boathouse Twickenham Ltd	Policy 12 Housing Needs of Different Groups	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	[See comment 470 in relation to the identified housing need and The Boathouse site]	
-							<b>Policy 13 Housing Mix and Standards</b>	
378	Rosanna Tunnadine, Habinteg	Publication Local Plan - Page 227 - Section 17 - Housing Mix					<p>About Habinteg Habinteg has over 50 years of experience as a registered provider of accessible and inclusive housing. Our mission is to provide and promote accessible and adaptable homes so that disabled and non-disabled people can live together as neighbours.</p>	<p>As an expert housing provider with a specialism in accessible homes, Habinteg welcomes the opportunity to comment on the development of the Richmond-Upon-Thames local plan. We note that Policy 13.E of the draft local plan is in general conformity with the London Plan and states that "At least 10% of all new build housing (via works to which Approved Document M (ADM) Volume 1 of the Building Regulations applies) is required to meet Building Regulation</p>



		and Standards - Policy 13.E				<p>Our response, therefore, focuses on issues of access and inclusion that we believe are vital to the development of a plan to serve the needs of the whole population of Richmond-upon-Thames. Please don't hesitate to contact us if we can help in any way. <i>[email removed for data protection]</i></p>	<p>Requirement M4 (3) 'wheelchair user dwellings' and all other new build housing (created via works to which Part M volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings', in accordance with London Plan Policy D7. Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement as set out in London Plan Policy D5 to demonstrate how the highest standards of accessible and inclusive design have been achieved."</p> <p>Habinteg strongly supports this policy and recommends that all new homes meet Building Regulations M4 Category 2 accessible and adaptable standard homes to meet the needs of disabled and older people in Richmond-upon-Thames.</p> <p>In order to address a deficit of wheelchair accessible homes, Habinteg strongly approves that 10% of all new homes meet Part M4 (3) Standard (wheelchair user dwelling) irrespective of being market or affordable dwellings.</p> <p>Habinteg believes that every local plan needs to:</p> <ul style="list-style-type: none"> <li>• Establish clear requirements for a proportion of all new housing to be built to the Building Regulations optional access standards.</li> <li>• Specifically name M4(2) and M4(3) standards in its plan with clear percentages of new homes required in each, regardless of whether a regional strategy or plan indicates an overarching requirement or not.</li> </ul> <p>We are therefore encouraged to see these standards specifically mentioned in policy 13.E.</p> <p>Suggestions for final policy wording</p> <p>Habinteg has conducted detailed analysis of local plans in respect of their accessibility policies and in the course of this work has identified examples of good practice which we would recommend are given consideration in the finalisation of the wording of the Richmond-Upon-Thames policy statement.</p> <p>1. We would recommend consideration be given to including additional wording to emphasise the overall intent of the policy to adequately provide for accessible housing requirements across all tenures and throughout developments. This will help to increase options for a wide range of households who may require accessible properties.</p> <p>We have identified good practice in drafting local planning policies that may help with this, for example a paragraph stating:</p> <p>'Where the scale of development would generate more than one wheelchair accessible home, based on the requirements of this policy, the mix of sizes, types and tenures of wheelchair user dwellings should reflect the mix of sizes, types and tenures of the development as a whole as closely as possible (unless there is evidenced need for additional wheelchair accessible properties in one particular type or tenure).' (Source: Doncaster local plan)</p> <p>2. We recommend additional wording that is very specific about the scope for exceptions. This can be supported by including wording along the following lines within the planning policy itself for the avoidance of doubt:</p> <p>'Exceptions to this requirement will only be considered where the applicant can robustly demonstrate with appropriate evidence that site specific factors make the policy unfeasible or unviable. (Source: Doncaster local plan)</p> <p>3. In relation to requirements for wheelchair accessible properties, distinguishing between what regulations require of market homes- M4(3)a) Wheelchair Adaptable standard, as distinct from homes for which the council have referral or nomination responsibility - M4(3)b) Wheelchair Accessible standard is helpful detail for developers. For example by including a paragraph such as:</p> <p>Any market homes provided to meet this requirement will be 'wheelchair adaptable' as defined in part M, whilst homes where the Council is responsible for allocating or nominating an individual may be 'wheelchair accessible'. (Source: Reading local plan).</p>		
379	Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common	Policy 13 Housing Mix and Standards				<p><b>b. Reasons for the proposed amendment – 4</b></p> <p>The reference to 'small units' and market 2 and 3 bed units does not seem to reflect the priorities identified in the LHNA below, where the identified need was social rent affordable 3 and 4 bed housing and supported housing. With private rents forecast to grow at the rates identified above, many families and vulnerable people will be priced out of the PRS and will require social rented accommodation. In line with national policy, the plan should be based on proportionate evidence, which would support this change.</p> <p><b>c. Relevant Policies and other evidence</b></p> <p>Relevant housing policies from the London Plan, NRRF and LHNA referred to above.</p> <table border="1" data-bbox="795 1801 1641 1892"> <tr> <td><b>National Planning Policy (NPPF)</b></td> <td><b>Strategic policies</b> <b>20. Strategic policies should .. make sufficient provision for a) housing (including affordable housing)</b></td> </tr> </table>	<b>National Planning Policy (NPPF)</b>	<b>Strategic policies</b> <b>20. Strategic policies should .. make sufficient provision for a) housing (including affordable housing)</b>	<p><b>a. Local Plan proposed amendment – 4</b></p> <p><b>Policy 13. Housing Mix and Standards</b></p> <p>A ... Areas within PTALs 3-6 or within 800m distance of a station or town centre boundary should provide a higher proportion of <b>small units (studios and 1 beds)</b>. For market housing, there is highest demand <b>for 2 and 3 beds</b>. The affordable housing mix should be based on discussions with a Registered Provider(s) to reflect local needs, in accordance with Policy 11 Affordable Housing. The housing mix should be appropriate to the site-specifics of the location <b>and in line with the LHNA priorities of 3 and 4 bed family housing for social rent and specialist accommodation.</b></p>
<b>National Planning Policy (NPPF)</b>	<b>Strategic policies</b> <b>20. Strategic policies should .. make sufficient provision for a) housing (including affordable housing)</b>								

						<p><b>Framework 2021 – Plan making and delivery</b></p> <p><b>22. Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.</b> Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.</p> <p><b>Preparing and reviewing plans</b></p> <p><b>31.</b> The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.</p> <p><b>Development contributions</b></p> <p><b>34.</b> Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.</p> <p><b>Examining Plans</b></p> <p><b>35.</b> ...Plans are ‘sound’ if:</p> <p>a) <b>Positively prepared</b> – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs<sup>21</sup>; and is informed by agreements with other authorities</p> <p>b) <b>Justified</b> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) <b>Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters..</p> <p>d) <b>Consistent with national policy</b> – enabling the delivery of sustainable development ..</p>		
						<p><b>London Policy H11 Build to Rent</b></p> <p>4.11.7 Proposals that do not provide 35 per cent affordable housing at the required discount to market rents, or 50 per cent on public sector land, or 50 per cent on industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity, or that do not meet the criteria of Part C of Policy H5 Threshold approach to applications will be subject to the Viability Tested Route under Part E of Policy H5 Threshold approach to applications.</p> <p>4.61 – HNA – The London Plan policy on affordable housing tenure split requires at least 30% of the affordable homes delivered by a development scheme to be provided as London Affordable Rent or Social Rent and another 30% provided as intermediate 26 products such as London Living Rent and shared ownership, with the final 40% to be determined by the Local Planning Authority (LPA).</p>		
						<p><b>NPPF 2021</b></p> <p>4.60 – HNA - Annex 2 of the NPPF also includes the needs of essential local workers ‘Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provided a subsidised route to home ownership and/or is for essential local workers’. Essential local workers are defined as ‘Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers’.</p>		
						<p><b>Housing Needs Assessment 2023</b></p> <p>2.4 For prime suburban locations within the M25, which would include locations such as Richmond, they expect to see an 8.0% drop in values in 2023, with 1.0% growth in 2024. Over the 5 year period to 2027, Savills expect compound growth in house prices of 6.0%</p> <p>2.5 Their 2023-27 forecast for London is of rental growth of 18.4%, with over 5% growth pa in both 2023 and 2024.</p>		

							<p>3.4 The 2011-21 period has seen a growth in households with 3 and 4 (+3,197 households – Table 3.2) persons (many of which will be families), with declining numbers of 1- and 2-persons households in absolute and relative terms despite the growing older population.</p> <p>3.19 Overcrowding is more prevalent in the Social Rented sector (1,121), and to a lesser extent in the PRS (1,392); .. 2,642 households in social rented homes as recorded by the Census who are under-occupying.</p> <p>4.7 .. points notionally to an 80%/ 20% split between rented affordable provision and affordable home ownership.</p> <p>5.6 The Commissioning Statement focuses on the need for places funded by the Council, identifying a need for:</p> <ul style="list-style-type: none"> <li>• Approx. 80 additional extra care / residential care units to 2035 with no currently contracted extra care provision in the east of the Borough, with the residential care beds focused on those with dementia. Dementia-friendly extra care provision is identified as a particular priority;</li> <li>• ‘Care and cluster’ schemes of self-contained flats for adults with learning disabilities with 24/7 staffing and communal areas. A projected need for 31 units between 2019-35 is identified. .. There is a limited current pipeline of supported living schemes..</li> <li>• mental health difficulties, with a potential need for up to 100 units identified ..</li> <li>• A lack of specialist supported living or extra care provision for adults with physical or sensory needs in the Borough.</li> </ul> <p>6. Housing Priorities ..</p> <p>6.2 Genuinely affordable housing and supported housing</p>								
380	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer	Policy 13 Housing Mix and Standards	No	N	N	Positively Prepared; Justified; Effective; Consistent with national policy	<p>Furthermore, we continue to have concerns regarding the soundness of Policies 10, 12, 13, 17, 18, 28, 38, and 45. These concerns are as set out in our representations made at the Regulation 18 stage (which have not been fully addressed in the Regulation 19 draft). We have therefore ‘re-submitted’ these comments which should be treated as forming part of our representations to the Regulation 19 draft (enclosed at Appendix A). [See Appendix 6, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 784 in relation to: issues regarding the likely effectiveness of the policy – clarify the standard referred to is the NDSS, clarify winter gardens can be an appropriate form of amenity on constrained sites to overcome issues of noise and air pollution, and clarify private amenity space relates to the London Plan minimum standards and can be accessed from bedrooms]</p>								
-	Jenny & Rod Linter	Policy 13 Housing Mix and Standards		N		Justified	<p>[See comment 505 in relation to types of dwelling and family accommodation) Affordable family homes, in keeping with the existing built environment are needed. Please could you explain if there are any controls over the type of dwellings that would be allowed. Who would the new apartment blocks be aimed at and would they satisfy local needs? Recent developments seem to discriminate against young people, families and those requiring support in the form of social housing.</p>								
-							<b>Policy 14 Loss of Housing</b>								
-	Victoria Chase (WSP), The Boathouse Twickenham Ltd	Policy 14 Loss of Housing	No	N	N	Positively Prepared; Justified; Effective; Consistent with national policy	<p>[See comment 470 in relation to loss of housing and The Boathouse site]</p>								
-							<b>Policy 15 Infill and Backland Development</b>								
381	Richard Carr, Transport for London (TfL)	Policy 15 Infill and Backland Development					<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Policy 15. Infill and Backland Development</td> <td>In A2, we welcome encouraging the redevelopment of car park sites to provide housing, although it should be noted that in policy H1 of the London Plan there is no need to demonstrate that the parking is no longer needed. This is because parking is known to</td> <td>We welcome removal of the requirement to demonstrate that parking is no longer needed and its replacement with the condition that ‘provided any net loss of parking is assessed in accordance with Policy 47 ‘Sustainable Travel Choices (Strategic Policy)’ and Policy 48 ‘Vehicular</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Policy 15. Infill and Backland Development	In A2, we welcome encouraging the redevelopment of car park sites to provide housing, although it should be noted that in policy H1 of the London Plan there is no need to demonstrate that the parking is no longer needed. This is because parking is known to	We welcome removal of the requirement to demonstrate that parking is no longer needed and its replacement with the condition that ‘provided any net loss of parking is assessed in accordance with Policy 47 ‘Sustainable Travel Choices (Strategic Policy)’ and Policy 48 ‘Vehicular		
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Policy 15. Infill and Backland Development	In A2, we welcome encouraging the redevelopment of car park sites to provide housing, although it should be noted that in policy H1 of the London Plan there is no need to demonstrate that the parking is no longer needed. This is because parking is known to	We welcome removal of the requirement to demonstrate that parking is no longer needed and its replacement with the condition that ‘provided any net loss of parking is assessed in accordance with Policy 47 ‘Sustainable Travel Choices (Strategic Policy)’ and Policy 48 ‘Vehicular													

						induce car travel so demand for it should not be described as arising from 'need'. As such, reductions in parking can deliver mode shift and reduce the dominance of vehicles in an area. To ensure consistency, this requirement should be deleted.	Parking Standards, Cycle Parking, Servicing and Construction Logistics Management'	
382	James Stevens, Home Builders Federation	Policy 15 Infill and Backland Development		No	Justified	<p><u>Part A 1 is unsound because it is unjustified.</u></p> <p>An increase in the supply of housing from small sites of 0.25ha in size or less is a matter of strategic importance for the Mayor of London – see para. 4.2.1 of the London Plan. As the London Plan states:  <i>For London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small sites is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.</i>  (Emphasis in the London Plan).</p> <p>Part A 1 of the policy reflects the London Plan is aiming to prioritise the delivery of small sites in PTAL 3-6 areas or areas located within 800m distance of a tube/rail station or town centre boundary. We feel this is too limiting. Most areas of the borough benefit from access to public transport, and the Council's aims for active travel means that confining development to these Areas of Intensification only is unnecessary. All areas of the borough should be considered suitable, subject to addressing design and historic buildings conservation objectives etc. This would be consistent with para. 4.2.5 of the London Plan, which states:  <i>The small sites target represents a small amount of the potential for intensification in existing residential areas, particularly in Outer London, therefore, they should be treated as minimums. To proactively increase housing provision on small sites through incremental development, Boroughs are encouraged to prepare area-wide housing design codes, in particular, for the following forms of development: residential conversions, redevelopment, extensions of houses and/or ancillary residential buildings.</i></p> <p>Part A 1 of the Policy should be amended to read:  sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a tube/rail station or town centre boundary (referred to as Areas for Intensification) are the most appropriate locations for residential development, <u>but all brownfield sites within the borough will be considered favourably, subject to addressing the other requirements of this policy.</u></p>		Sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a tube/rail station or town centre boundary (referred to as Areas for Intensification) are the most appropriate locations for residential development, <u>but all brownfield sites within the borough will be considered favourably, subject to addressing the other requirements of this policy.</u>
-						<b>Policy 16 Small Sites</b>		
383	Katherine Drew, The Royal Parks	Policy 16 Small Sites				In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again. [See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 791 in relation to expense of open space and addressing impacts on the Parks]		
384	Martha Bailey, London Historic Parks and Gardens Trust	Policy 16 Small Sites				<p>A. The Council will support the delivery of the small sites target of 234 new homes per annum in accordance with London Plan Policy H2.</p> <p>B. In accordance with the London Plan, intensification is encouraged on small sites with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail station or Major or District town centre boundary (as defined in the London Plan). Outside of these locations, development will be considered provided no unacceptable impact(s) identified against other policies in this Plan.</p> <p>C. Proposals for small sites will need to have regard to the existing townscape character, as set out in the Urban Design Study, with proposals reflecting the building typology and demonstrating how they accord with the broad strategy for planning and management set out in the design guidance for each character area.</p> <p>D. The Council will support proposals for well-designed new homes on small sites (up to 0.25 hectares) to meet local needs, in accordance with environmental, transport, parking and other relevant policies, see Policy 15 'Infill and Backland Development'. Proposals on small sites are expected to: [...]</p> <p>5. <u>Result in no net loss of existing biodiversity or significant loss of open space or garden land.</u></p>		Please re-phrase this [D.5] to read 'result in no net loss of existing biodiversity, open space or garden land. Where it can be demonstrated that loss of open space is unavoidable, this loss should be offset through the provision of open space elsewhere in the borough, preferably within the development site.'
385	James Stevens, Home Builders Federation	Policy 16 Small Sites		No	Consistent with national policy	<p><u>The Plan with respect to small sites is unsound because it fails to reflect national and London Plan policy.</u></p> <p>An increase in the supply of housing from small sites of 0.25ha in size or less is a matter of strategic importance for the Mayor of London – see para. 4.2.1 of the London Plan. As the London Plan states:  <i>For London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small sites is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.</i>  (Emphasis in the London Plan).</p> <p>To support the delivery of housing via small sites, the London Plan has set indicative figures for the number of homes that should be delivered on small sites. This is set out in Table 4.2. The figure per year for Richmond-upon-Thames Council is 2,340 homes over the ten-year period 2028/29. This figure represents 57% of the overall requirement for new homes in Richmond-upon-Thames to be provided on small sites. This is not an absolute figure; it provides an</p>		

						<p>indication of what the Mayor of London considers could be supplied within Richmond-upon-Thames if certain actions are taken to encourage small sites.</p> <p>As discussed above and below, we do not consider that the aim for net zero homes and 50% affordable housing is conducive to encouraging an increase in the supply of homes from small sites.</p> <p>Second, the Council will need to do more to identify and allocate more small sites as expected by London Plan Policy H2, Part B, 3). This would help to ensure that some of the requirement will be delivered. We have considered the Local Housing Availability Assessment, but this dates back to 2008. We believe the Council relies on the GLA SHLAA study from 2017. It is unclear if the Council has been able to identify and allocate any small sites of 0.25ha in size or less, but it should try to do so, to conform to the London Plan.</p> <p>National policy expects also that 10% of the housing requirement to be provided on small sites.</p> <p><u>Part B</u></p> <p>Part B of the policy reflects the London Plan, but in view of the generally good public transport communications across the borough we feel that that the need to justify small sites where proposals fall outside of PTAL levels 3-6 or 800 metres of a public transport node, or town centre boundary etc is unnecessary and should be dropped. Any small site proposal should be considered favourably and not discounted based on location.</p> <p>No area of the borough should be placed off-limits. The objective of increasing active travel - see strategic objective 8 on page 17 of the Plan – will complement this. The 20-minute neighbourhood objective - Policy 1 – would also support this. A 20-minute walk equates, approximately, to 1.5km which is about twice the distance provided in the London Plan. As the Council says in its strategic vision for the Plan on page 12, by 2039</p> <p><i>“Everything a local resident needs can now be reached within 20 minutes by foot or bike.”</i></p> <p>Reducing the need for travel – another strategic objective – complements also building in locations further away from transport nodes and town and district centres.</p> <p>Map 17.1 shows the areas suitable for incremental intensification. This would appear to omit some quite sizeable areas of the borough that: a) enjoy public transport connectivity; and b) have district centres providing services. One such area is Ham bounded by the A307.</p>		
-	Victoria Chase (WSP), The Boathouse Twickenham Ltd	Policy 16 Small Sites	No	N	N	Positively Prepared; Justified; Effective; Consistent with national policy	[See comment 470 in relation to small sites and The Boathouse site]	
-							<b>Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic</b>	
386	Claire Wilmot	Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic					Supporting our local shops is important as without them the area would not be so vibrant do not reduce parking spaces in the High street (Twickenham suffered badly when this was done). Look at waste solutions for the flats as it becomes a festival of litter every Friday. Why are we not able to provide large wheelie bins for residents and recycling areas other cities do (Brighton - Wheelie bins) Lisbon (underground bins and recycling). Ensure that residents that leave their rubbish out on the road are not allowed to do so in plastic bags etc.	
387	Tim Catchpole, Mortlake with East Sheen Society	Shaping and supporting our town and local centres					<b>Theme: Shaping and supporting our town and local centres (Policies 17-20)</b> [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments – comments 796, 803, 810, and 815 in relation to these policies] No comments on your responses.	
-	Peter Thompson, National Physical Laboratory (NPL)						[See comment 132 in relation to Policy 17 and NPL]	
-							<b>Policy 17 Supporting our Centres and Promoting Culture (Strategic Policy)</b>	<b>Modification(s) consider necessary</b>
388	Mark Knibbs (Avison Young with input from Montagu Evans and	Policy 17 Supporting our Centres and Promoting Culture	No	N	N	Positively Prepared; Justified; Effective; Consistent	Furthermore, we continue to have concerns regarding the soundness of Policies 10, 12, 13, 17, 18, 28, 38, and 45. These concerns are as set out in our representations made at the Regulation 18 stage (which have not been fully addressed in the Regulation 19 draft). We have therefore ‘re-submitted’ these comments which should be treated as forming part of our representations to the Regulation 19 draft (enclosed at Appendix A).	



	Energist), <b>St George plc and Marks and Spencer</b>	(Strategic Policy)				with national policy	[See Appendix 6, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 799 in relation to: part A of the policy should be amended to include reference to major retail and leisure development also being directed to allocations, and amend the supporting text to remove the theoretical assumption all new town centre uses should be accommodated in vacant shop units and re-purposing existing retail floorspace does not mean that there is no requirement to allocate sites for major retail development. The retail hierarchy should define which locations are town centres through an assessment of scale, role, catchment and function, to comply with the NPPF; and the role and function of the various tiers, to assist with the operation of the sequential and impact tests. The evidence base is out of date due to the age of the household survey, or will be due to new Experian economic forecasts in January 2022]	
-							<b>Policy 18 Development in Centres</b>	
389	Tom Clarke, <b>Theatres Trust</b>	Policy 18 Development in Centres, A.8 & designation of Cultural Quarters on the Policies Map	Yes	Yes	Yes		Theatres Trust welcomes the support given to Cultural Quarters, and of inclusion of theatres within the Cultural Quarter designations in both Richmond and Twickenham.	
390	Solomon <b>Green</b>	Policy 18 Development in Centres					The type of shops available in Sheen center has changed. Some time ago my wife and I counted 39 food outlets,10 charity shops, hairdressers, nail bars. This is probably happening all over London but the closure of specialist shops such as those specialising in electrical repairs, caused by high rates and unaffordable rents is noticeable.	
391	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), <b>St George plc and Marks and Spencer</b>	Policy 18 Development in Centres	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	Furthermore, we continue to have concerns regarding the soundness of Policies 10, 12, 13, 17, 18, 28, 38, and 45. These concerns are as set out in our representations made at the Regulation 18 stage (which have not been fully addressed in the Regulation 19 draft). We have therefore 're-submitted' these comments which should be treated as forming part of our representations to the Regulation 19 draft (enclosed at Appendix A). [See Appendix 6, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 806 in relation to: the Local Plan should provide town centre and primary shopping area boundaries, and only defined frontages where they can be justified, to reflect the NPPF and PPG. Part C of the Policy requires major development that generates high levels of trips to be located within a town centre boundary, but this is not consistent with other parts of the Plan, notably the Site Allocation for Kew Retail Park; amend the text to refer to specific allocations. Part F states out of centre development is not considered appropriate in line with the London Plan, but the London Plan does not preclude it; amend the text to refer to where out of centre development involves the replacement of existing out of centre development and/or in accordance with Site Allocations. Part F refers to the sequential test for main town centre uses and impact assessments for retail and leisure, but should refer to proposals outside of defined centres and not in accordance with an up to date development plan; the sequential test should not apply to proposals at Kew Retail Park (or any other retail allocation). Similar inconsistencies in relation to the impact test.]	
392	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), <b>St George plc and Marks and Spencer</b>	Policy 18 Development in Centres	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	In addition to our Regulation 18 representations enclosed at Appendix A [See Appendix 6], we note that Part C of Policy 18 is potentially inconsistent with Part G.	In order to resolve this, we recommend the following amendments to Part C: Major development and/or development which generate high levels of trips should be located within a town centre boundary, unless justified by Part G.
393	Olivia Russell (CBRE), <b>Rugby Football Union (RFU)</b>	Policy 18 Development in Centres	Yes	No	Yes	Justified; Consistent with national policy	<b>Policy 18 (Development in Centres)</b> As drafted in the Regulation 19 Local Plan, Policy 18 (part C) states: "C. Major development and/or developments which generate high levels of trips should be located within a town centre boundary. Elsewhere development within the local centre boundary should serve as more localised provision, which may include opportunities for retail, recreation, and smaller-scale employment uses." As highlighted in the RFU's Regulation 18 representations, this does not acknowledge the high level of trips from attractions such as Twickenham Stadium, and the objective to enhance the existing facilities as supported in Site Allocation 13. However, in response to the RFU's representations to the Regulation 18 Plan, LBRuT has confirmed that Policy 18 would not preclude appropriate development at Twickenham Stadium, and Policy 26 (Visitor Economy) is supportive of proposals which support and enhance existing visitor attractions which would include Twickenham Stadium. This clarification is welcomed.	
394	Louise Fluker, <b>The Richmond Society</b>	Policy 18 Development	Yes	No	Yes	Justified	Draft Plan does not recognise the need for retailers to have deliveries which in many instances will need to be by a vehicle. In addition as more commercial premises are converted to residential units without parking provision it is likely that these residents will rely on deliveries by couriers so the number of such deliveries will increase significantly.	Add to the end of the sentence "18.17 Focusing development in the town centres will result in sustainability benefits, including a reduction in the need to travel by car" the words "(accepting that deliveries to retailers and residents will continue to be made by vehicles)".

		in Centres, Para 18.17						
395	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	Policy 18 Development in Centres					[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 805... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 805 in relation to Policy 18, the Retail & Leisure Needs Survey and estimated demand and availability of floor space]	
-	Gerard Manley (Firstplan), <b>Baden Prop Limited</b>						[See comment 250 in relation to Site Allocation 25, Policy 18 and the Town Centre, Retail and Leisure Study]	
-							<b>Policy 19 Managing the Impacts of Development on Surroundings</b>	
396	Tom Clarke, <b>Theatres Trust</b>	Policy 19 Managing the Impacts of Development on Surroundings A.2	Ye s	Y e s	Y e s		Theatres Trust is supportive of the premise of this policy, but recommends that part A.2 is edited to change reference from 'uses with late night licences' to include cultural and live performance venues. This is because necessary supporting activities at these venues which occur outside of their licensable activities can cause disturbance to incoming residential uses. Primarily this would be late night and early morning delivery and removal of sets and equipment necessary to meet the needs of touring productions.	Revision of text from 'uses with late night licences' to 'uses with late night licences and/or that operate as cultural and live performance venues.'
397	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	General comment in relation to Evening and Night Time Economy					[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 812... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 812 in relation to the evening and night time economy]	
-	Julie <b>Scurr</b>						[See comment 239 in relation to the night time economy in Richmond]	
-							<b>Policy 20 Shops and Services Serving Essential Needs – no comments received</b>	
-							<b>Increasing jobs and helping business to grow and bounceback following the pandemic</b>	
398	Claire <b>Wilmot</b>	Increasing jobs and helping business to grow and bounceback following the pandemic					Jobs should indeed be encouraged however in the right areas, Udney Park Road on the present site Bagnalls proposed buildings which would have added more accommodation and provided additional employment for 'services' the yard at the moment doesn't provide that much employment and is in a residential area. In 32 years of being a neighbour they have been good (although this morning we were woken before 7AM by work in the yard). The council rejected the proposed building due to lack of employment when actually more would have been realised.	
399	Jon <b>Rowles</b>	Increasing jobs and helping business to grow and bounceback following the pandemic, Policy 23 (Offices) and Policy 24 (Industrial Land)					- The council cannot meet its objectively assessed need for office and industrial floorspace. Whilst a reasonable policy response is to strongly protect existing land, I feel they should have also used the duty to cooperate mechanism to see if Hounslow, Kingston Upon Thames or Wandsworth could meet some of this unmet demand and see how they can improve transport links any capacity they are able to supply.	
400	Kay Collins (Solve	Employment Policies					<b>Employment Policies (Policies 21, 23 and 24)</b> Employment policies relevant to the island are as follows:	

	Planning), <b>Port Hampton Estates Limited</b>	(Policies 21, 23 and 24)				<p><b>Policy 21. Protecting the Local Economy (Strategic Policy)</b> A. The Council will seek to retain and attract investment from existing and emerging sectors to support the existing business base and create a diverse and enterprising local economy. New development proposals will be supported which:</p> <p>1. Protect existing employment floorspace for office and industrial use, with a no net loss approach. Take an employment-led approach to any redevelopment to meet local economic needs through intensification of the existing employment floorspace. ...</p> <p>4. Provide a range of commercial unit types, that are flexible and adaptable to changing needs, suitable for subdivision and configuration for new economic uses and activities for a range of occupiers;</p> <p><b>Policy 23. Office</b> Retention of offices A. There is a presumption against the loss of office floorspace in all parts of the borough. Proposals which result in a net loss of office floorspace will be refused. Any redevelopment proposals are required to contribute to a net increase in office floorspace. Any refurbishment of existing office floorspace should improve the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) as set out in London Plan Policy E1.</p> <p><b>Policy 24. Industrial land</b> Retention of industrial space A. There is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused. Any redevelopment proposals are required to contribute to a net increase in industrial floorspace. Any refurbishment of existing industrial floorspace should include traditional formats along with workspace for light industrial, through intensification as set out in London Plan Policy E7 part A.</p> <p>While we support the principles included in these policies, they need to take account of site specific conditions that may not enable reprovision of employment space or provision for a range of types of commercial units in the way envisaged by these policies. This is particularly the case on sites such as Platt's Eyot where access arrangements and site conditions mean that the opportunities to provide for a range of uses is more limited. These limitations on some sites should be recognised in these policies or in the site specific text and final policy for Platt's Eyot.</p>	
401	James Sheppard (CBRE), LGC LTD	Policies 21-25 Employment Land and Premises Needs Assessment	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<p><b>Employment</b> The Publication Local Plan proposes to designate the LGC site as 'Locally Important Industrial Land and Business Park' and a 'Key Business Area'. LGC understands the broad rationale of protecting these employment sites to ensure a sufficient employment land supply across the borough over the plan period, as evidenced in <b>paragraph 4.19</b> of the Publication Local Plan.</p> <p>However, we deem it crucial for the Council to further consider how these needs can be accommodated through mixed-use development. The indicative scheme as previously presented to the Council, illustrates how a highly inefficient, sustainably located brownfield site can be redeveloped to increase job numbers from approximately 250 to a possible 850. This would constitute a substantial windfall of employment generation for LBRuT, whilst simultaneously achieving other policy aspirations such as affordable housing delivery. A mixed-use development would also achieve a wide range of placemaking objectives.</p> <p>Indeed, a well-considered mixed-use proposal would align with a number of key employment policies. <b>Draft Policies 21 and 23</b> seek to protect existing floorspace for office and industrial use, with a no net loss approach. It has been demonstrated through illustrative masterplans for the site, presented to the Council, that this can be achieved through a more efficient and effective use of land. <b>Draft Policy 21</b> goes on to promote the supply of affordable workspace to support small and medium sized enterprises, as identified in <b>draft Policy 25</b>, which would also be integrated into any mixed-use redevelopment scheme for the site.</p> <p>We refer to adopted Policy LP40 (1) of the adopted Local Plan which, although seeking the broad protection of employment land, stating "land in employment use should be retained in employment use for business, industrial or storage purposes", an allowance is made under exceptional circumstances for mixed-use redevelopment. Policy LP40 (4) states "mixed use development proposals which come forward for specific employment sites should retain, and where possible enhance, the level of existing employment floorspace". <b>Policy wording for the draft plan should carry with it a degree of flexibility in exceptional circumstances, specifically as part of draft Policies 21, 23 and 24.</b></p> <p>Crucially, the potential for a co-location of uses on locally important industrial sites is allowed for under <b>London Plan Policy E7. London Plan Policy E7(B)</b> states that "Development Plans should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified". <b>Policy E7(B)</b> goes on to state, "Intensification can also be used to facilitate the consolidation of an identified LSIS to support the delivery of residential and other uses". The policy states that "this approach should only be considered as part of a plan-led process of LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated master planning process in collaboration with the GLA and relevant borough. In LSIS the scope for co-locating industrial uses with residential may be considered". LGC considers that any plan-led co-location of uses can be achieved whilst ensuring that those criteria set out in <b>Policy E7(D)</b> can be met.</p> <p>In this respect, the Publication Draft Plan is <b>not legally compliant, nor sound.</b></p>	<p><b>2. Publication Draft Policies 21, 23 and 24 to include allowance for intensification/co-location of industrial and residential use (mixed-use), as per the London Plan provision made in London Plan Policy E7(B)</b></p> <p>London Plan Policy E7(B) states that "Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified (...). Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications. In LSIS (but not in SIL) the scope for co-locating industrial uses with residential and other uses may be considered. This should also be part of a plan-led or masterplanning process".</p> <p>Therefore, we strongly consider that <b>draft Policies 21, 23 and 24</b> should include provisions for the co-location of industrial and residential uses as part of the plan-led process, potentially through the intensification of development sites.</p> <p>In addition, <b>Draft Policy 24</b> allows for little flexibility, constraining the Council's ability to consider high-quality mixed-use schemes that deliver increases, both qualitatively and quantitatively, to employment floorspace, along with other planning and public benefits. The wording of <b>draft Policy 24(A)</b> states a "presumption against loss of industrial <u>land</u>", continuing, "proposals which result in a net loss of industrial <u>land</u> will be refused". We urge the Council to promote more flexible wording through draft Policy 24, that ensures no net loss of industrial floorspace and promotes net increases where feasible. This flexibility could be allowed for through deletion of "<del>Proposals which result in a net loss of industrial land will be refused</del>". It can be demonstrated through intensification, and a more efficient and effective use of land, that mixed-use developments can come forward in appropriate locations that lead to net increases in industrial floorspace, whilst meeting other policy aspirations.</p>


402	Jonathan Blathwayt, GLA on behalf of Mayor of London	Industrial and Employment Land					LBRuT's Employment Land and Needs Assessment 2021 has identified that there is a need for an additional 60,000sq.m of industrial space for the period from 2019 to 2039. This figure includes the need for both B2 and B8 space aggregated together. I would welcome the breakdown of industrial space need and where/how it is being met as different industrial functions may require different building typologies. Policy 24 of the draft Plan sets out to protect existing floorspace and deliver additional floorspace through redevelopment and intensification and is aligned with Policy E7 of the LP2021. Policy 23's aim to retain existing office space and focus new development into town centres and identified Key Business Areas is aligned with Policy E1 LP2021. Paragraph 6.1.4 of the LP2021 sets out that office growth locations in outer London should be supported by improvements to public transport as well as walking and cycling connectivity and capacity.	
403	Duncan McKane, London Borough of Hounslow	Policy 23 Offices, Policy 24 Industrial Land					<b>Employment Policies</b> LBH note the findings of the Employment Land & Premises Needs Assessment update (2023) with regards to identified need for office and industrial floorspace. LBH also note the plan approach toward avoiding any net loss in existing office or industrial floorspace whilst supporting new development in appropriate locations (Policies 23 and 24). [See also comment 414 on affordable workspace] LBH will look to agree positions with LBRUT on meeting employment needs through a Statement of Common Ground (SoCG) in coming months.	
-							<b>Policy 21 Protecting the Local Economy (Strategic Policy)</b>	
404	Nick Alston (Avison Young), The Offer Group Ltd	Policy 21 Protecting the Local Economy (Strategic Policy)		No		Positively Prepared; Justified; Effective; Consistent with national policy	[See also comment 409 in relation to Policy 23 Offices] <b>Draft Richmond Local Plan (Regulation 19) Consultation Response</b> We write to make a representation in relation to Policies 21 and 23 of Richmond's Publication (Regulation 19) draft Local Plan. We write on behalf of The Offer Group Ltd, who retain an interest in Burgoine House, 8 Lower Teddington Road and other nearby properties. Specifically, draft Policy 21 "Protecting the Local Economy (Strategic Policy)" states: <i>"New development proposals will be supported which: 1. Protect existing employment floorspace for office use, with a no net loss approach..."</i> It is our view that the above represents an overly restrictive policy position which is not sound on the following grounds: <ul style="list-style-type: none"> <li>It is not justified – A 'no net loss' approach does not reflect the conclusions and findings of the Council's evidence base (Employment Land and Premises Needs Assessment Update April 2023);</li> <li>It is not positively prepared – Positive wording is required to effectively manage the significant amount of existing surplus (vacant/available) office floorspace in the borough (as identified in the evidence base);</li> <li>It is not in accordance with national planning policy – In particular NPPF paragraphs 82(d) and 123, and the requirement to be in general conformity with the London Plan (noting London Plan Policy E1); and</li> <li>It is not effective – as a consequence of the above, the wording of the policies is not effective.</li> </ul> [see comment 409 in relation to the reasoned justification]	In our view, draft Policies 21 and 23 should be amended as set out below as tracked changes to allow suitable flexibility to ensure their soundness: <b>Policy 21</b> A. The Council will seek to retain and attract investment from existing and emerging sectors to support the existing business base and create a diverse and enterprising local economy. New development proposals will be supported which: 1. <u>Retain Protect</u> existing employment floorspace capacity for office use, <del>with a no net loss approach</del> . <u>The intensification of existing sites in office use is encouraged, to include the introduction of complementary alternative uses, including housing</u> . Take an employment-led approach to any redevelopment existing office floorspace for industrial use to meet local economic needs through intensification of the existing employment floorspace. ...
405	Katherine Drew, The Royal Parks	Policy 21 Protecting the Local Economy (Strategic Policy)					In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again. [See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 829 in relation to economic spin offs and mitigation of increase in footfall]	
406	Summer Wong (RPS), Notting Hill Genesis	Policy 21 Protecting the Local Economy (Strategic Policy) (p.253-254), Paragraph 19.3	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<b>Policy 21 Protecting the Local Economy (Strategic Policy) (p.253-254)</b> Part A (1) of Policy 21 seeks to protect existing employment floorspace for office use, with a no net loss approach. We consider this policy approach to be inconsistent with NPPF and the London Plan Policy E4. It should be noted that prior to the adoption of the London Plan (2021), the Secretary of State (SoS) required the removal of the 'no net loss of industrial land' requirement from the 2021 London Plan Policy E4, which now requires a 'sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained.' Moreover, a 'no net loss' approach disregards any site-specific constraints of existing employment sites in Richmond, and the fact that new employment development or mixed-use schemes could have fit-for-purpose new built workspace and the potential to increase employee numbers, and better energy efficiency. This approach is also contrary to the London Plan Policy E4 which encourage the intensification and consolidation of industrial use with other compatible land uses. Policy 21 should therefore be amended to remove the 'no net loss' approach to employment floorspace, and adopt the London Plan Policy E4 approach of the retention, enhancement and provision of additional industrial capacity.	<b>Recommended Amendment</b> Policy 21 Part A) Point 1) 'Protect existing employment floorspace for office use, <del>with a no net loss approach</del> . Take an employment-led approach to any redevelopment for industrial use to meet local economic needs through intensification of the existing employment floorspace.' Paragraph 19.3) 'This policy seeks to protect <b>viable</b> existing employment land within designated employment areas'. This would better reflect the supporting paragraphs of London Plan Policy E4.
407	Michael Amherst	Para 19.1 - Key Business Plan	No	No	No	Justified; Consistent with national	We own a small unit in The Quadrant. The ground floor and basement are retail, the uppers were previously flats but were used as ancillary by the previous tenant and are now classed as offices. The 'office' area is spread out over 3 floors and equates to only 183.86 m2. Three different agents have tried to let the space over the last three years but we have had no serious interest and the space remains unlet. All three agents have said the space is too small, too poorly	We believe that any further use of an Article 4 for the Key Business Area should include an exemption for particularly small units. This exemption could be coupled with the existing Class MA of General Permitted Development Order, thereby meaning only units below a certain size and that have been vacant for three months, need be exempted.



					policy; Effective	<p>configured (as a period property) to be reconfigured or made attractive to prospective office tenants. The only user they can forsee for it is to return it to flats.</p> <p>While supporting the principle of Key Business Areas, we believe that the use of Article 4 to place a blanket ban on conversion of space, including space that is not attractive to tenants and unlettable as office space, is unjustified and goes against national guidelines concerning residential conversion.</p> <p>In July 2021 the NPPF was revised, requiring Article 4 Directions to be limited to situations where a direction is 'necessary to avoid wholly unacceptable adverse impacts' and where it is based on 'robust evidence, and applies to the smallest geographical area possible'.</p> <p>We believe that by including very small units in period properties, that are not desirable or usable as offices in the Article 4 directives, is not necessary to avoid wholly unacceptable adverse impacts as these spaces will never be used as offices.</p>	
-	James Sheppard (CBRE), LGC LTD					[See comment 401 in relation to Policy 21 and the LGC site]	
-	Kay Collins (Solve Planning), Port Hampton Estates Limited					[See comment 400 in relation to Policy 21 and Platt's Eyot]	
-	Peter Thompson, National Physical Laboratory (NPL)					[See comment 132 in relation to Policy 21 and NPL]	
-						<b>Policy 22 Promoting Jobs and our Local Economy</b>	
408	Katherine Drew, The Royal Parks	Policy 22 Promoting Jobs and our Local Economy				<p>In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again.</p> <p>[See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 821 in relation to mitigation of increase in footfall]</p>	
-	James Sheppard (CBRE), LGC LTD					[See comment 401 in relation to Policy 22 and the LGC site]	
-	Peter Thompson, National Physical Laboratory (NPL)					[See comment 132 in relation to Policy 22 and NPL]	
-						<b>Policy 23 Offices</b>	
409	Nick Alston (Avison Young), The Offer Group Ltd	Policy 23 Offices		No	Positively Prepared; Justified; Effective; Consistent with national policy	<p>[See also comment 404 in relation to Policy 21 Protecting the Local Economy]</p> <p>Whilst draft Policy 23 "Offices: Retention of Offices" states:  <i>"A. There is a presumption against the loss of office floorspace in all parts of the borough. Proposals which result in a net loss of office floorspace will be refused..."</i></p> <p>[see comment 404 in relation to the above represents an overly restrictive policy position]</p> <p><b>Reasoned Justification</b>  <b>Findings of the Council's Evidence Base</b>  Following the Covid19 pandemic, there has been a clear rise in flexible and agile working, resulting in the need for flexibility when it comes to the use of office space and the need to respond to future changes in demand. Therefore as part of the current consultation, the Council have updated their Employment Land and Premises Needs Assessment (April 2023). The Assessment is clear that there are high levels of vacant and available existing office space in the borough. Importantly, it confirms that this is a prolonged situation extending over an extended period of time (as opposed to a short term temporary anomaly). Office availability in the borough is at 2023 is at 25% of all stock (15% vacant office space and 10% short term occupied), a significant increase from 5% in 2019. To put this into context, the 2021 version of the aforementioned Assessment, advises that office availability in the borough was recorded to be 21% which was assumed to be a spike as a result of Covid and that the trend would revert back to lower availability levels. As explained in the 2023 update, this</p>	<p><b>Policy 23</b>  <b>Retention of offices</b>  A. There is a presumption against the loss of office floorspace capacity in all parts of the borough, <u>unless robust and compelling evidence is provided which clearly demonstrates that there is no demand for an office use in that location and that there is not likely to be in the foreseeable future. This should include evidence of completion of a marketing exercise of the site at realistic prices both for the existing office use or an alternative office-based use completed over a minimum period of 12 continuous months.</u> <del>Proposals which result in a net loss of office floorspace will be refused.</del> Any refurbishment of existing office floorspace should improve the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) as set out in London Plan Policy E1. ...</p>



					<p>did not happen, and indeed availability has risen post-Covid. The Assessment identifies that there is now a surplus of 21,000sqm of office floorspace, and so therefore the Assessment advises that:  <i>"in the short-term the efficient operation of the office market in the Borough would not be affected if some of that floorspace was lost"</i> (para. 3.97)</p> <p>Indeed, the report identifies that it would take the market around five years to absorb the current 21,000sqm surplus of office floorspace. Importantly, the concluding paragraphs (4.3-4) of the Assessment supports a shift in approach in the identification of office floorspace need, stating that surplus vacant existing floorspace could be recycled for office or <b>for other uses</b>, up to the point where available supply approaches the 7.5-10% mark.</p> <p>As such, the evidence base clearly supports a flexible and positively worded planning policy approach to offices, which is clearly at odds with the 'no net less' approach set out in draft Policies 21 and 23. As currently worded, policies 21 and 23 are simply too restrictive – a position that is not justified by the evidence. This is in the context that the borough (and London as a whole) has a finite supply of land, which is insufficient to meet its assessed development needs, particularly for housing. Therefore the protection of land for a particular use that is not needed will, as a consequence, prevent other needs being met. This is in conflict with sound planning judgement.</p> <p>Given the current level of availability, and the fact that this availability has in the past 18 months increased rather than decreased, it makes sense to allow for the change of use of offices to other appropriate uses, where appropriate exceptions are met, as suggested in the proposed policy wording.</p> <p>We note that draft paragraph 19.19 of the supporting text does state that the Council will require satisfactory marketing evidence where a change of use is not supported by policy. Whilst it is positive to know that the Council are amenable to this requirement, it is necessary for any exception test to be included within the text of the policy itself, in much the same way that current policy LP41 includes exceptions within the policy wording. As supporting text, the requirement does not provide sufficient clarity on the Council's approach to decision-making. Indeed the last sentence of paragraph 19.19 states that "provision of marketing in itself does not justify an exception to policy". The policy needs to be clear as to what criteria would comprise an exception to policy, as per our suggested wording.</p> <p>The recommendation for positively worded policies in relation to surplus office floorspace permits the Council to carry out site-by-site assessments but also provides a clear planning framework for applicants, and importantly encourages the most efficient and optimal use of land within the Borough. Being clear what the criteria is for considering the loss of office accommodation in the Borough would also lead to more consistent decision making.</p> <p>The rigidity of the policy fails to take account of the unique economic characteristics of individual sites and a more positively worded policy, which considers the local market and suitability of the building for office purposes, will enable the Council to properly assess the site for continued office use and then, in turn will allow a more considered discussion on alternative uses. This is vital for buildings such as Burgoine House that continue to remain protected, despite compelling evidence that reusing the vacant building for office accommodation, or its redevelopment for solely employment purposes would be unviable.</p> <p><b>Compliance with National Planning Policy</b></p> <p>The 'no net loss' approach to employment floorspace proposed within draft policies 21 and 23, does not align with the London Plan (2021) or the NPPF.</p> <p>Paragraph 82(d) of the NPPF requires planning policies to be flexible enough to accommodate needs not anticipated in the plan, allowing for new and flexible working practices, and to enable a rapid response to changes in economic circumstances. Paragraphs 123 and 124 of the NPPF encourages a positive approach to alternative uses and efficient use of land, particularly that of employment land for homes in areas of high housing demand.</p> <p>London Plan Policy E1(i) states that "the redevelopment, intensification and change of use of surplus office space to other uses including housing is supported", whilst London Plan para. 6.1.7 states that "surplus office space includes sites and/or premises where there is no reasonable prospect of these being used for business purposes. Evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing". Further, London Plan policy E1(e) states:  <i>"Existing <b>viable</b> office floorspace capacity in locations outside the areas identified in Part C should be retained, supported by borough Article 4 Directions to remove permitted development rights where appropriate, facilitating the redevelopment, renewal and re-provision of office space where <b>viable</b> and releasing surplus office capacity to other uses."</i> (emphasis added)</p> <p>As such, the wording of draft policies 21 and 23 should reflect London Plan policy E1 to allow change of use from offices to other uses where it can be demonstrated through relevant evidence that the existing use is no longer viable or suitable.</p> <p><b>Summary</b></p> <p>The proposed wording of draft policies 21 and 23 is not sound as they are not positively prepared, not justified by the evidence base, not consistent with national policy, and therefore not effective. A "no net loss" stance to offices does not allow for the necessary flexibility to respond to future changes in market trends. Indeed, the Employment Land and Premises Needs Assessment 2023 is clear that there are good levels of office availability, which would take the market at least 5 years to absorb. The conclusions of the Assessment states that policy can be positively worded to allow change of use of offices to other uses. As such, our proposed wording of policies 21 and 23 allows suitable flexibility so that they can respond to future changes in the employment market.</p> <p>We trust the above comments are helpful and will be given due consideration in the formulation of the Proposed Submission Draft document.</p>	
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410	Tim Humphries (Firstplan), William Grant & Sons Ltd	Policy 23 Offices, Paragraphs 19.19, 19.24, 19.25, Key Business Areas, Employment Land and Premises Needs Assessment (2021 and 2023 versions)	No	No	Positively Prepared; Justified; Consistent with national policy	<p>[Summary provided on the response form is not repeated here as the full comments have been included in the schedule]</p> <p><b>Section 1 Introduction</b></p> <p>1.1 The following Representations have been prepared by Firstplan Ltd (herein referred to as 'Firstplan') on behalf of 'William Grant &amp; Sons Ltd' ('WGS') with respect to the 'Royal Borough of Richmond Council's' (the 'Council') Publication (Regulation 19) 'Draft Local Plan' (the 'Publication Draft Local Plan'), which opened for consultation between June – July 2023.</p> <p>1.2 These Representations are made by WGS in connection with the implications of the 'Draft Local Plan' for a property in their ownership at 84 Lower Mortlake Road, TW9 2HS, which is known as 'Independence House'. The Representations are made digitally (by email) and have been submitted prior to the closure of the public consultation on 11:59pm on Monday 24th July 2023. They are supported by a completed 'Response Form', together with the following documents that have been commissioned by WGS and are included within this Statement:</p> <ul style="list-style-type: none"> <li>• Marketing Report by Stirling Shaw [at Appendix 2] [See Appendix 8 to this schedule]</li> <li>• Employment Evidence review by Lichfields [at Appendix 3] [See Appendix 8 to this schedule]</li> </ul> <p>1.3 WGS challenges the 'soundness' and 'legal compliance' of the draft Local Plan on the basis of the designation of Independence House within a 'Key Business Area' and the current drafting of Draft Policy 23 'Offices' which is not positively prepared, justified, consistent with national policy, or in general conformity with the London Plan.</p> <p>1.4 These Representations demonstrate that the continued designation of Independence House within a Key Business Area in the Publication Draft Local Plan is not supported or justified by the Council's evidence base, nor the latest market signals presented in the Employment Evidence review by Lichfields. This is contrary to the requirement in the NPPF (paragraph 31) that "the preparation and review of all policies should be underpinned by relevant and up-to-date evidence".</p> <p>1.5 It is further demonstrated that the approach set out in Draft Policy 23 is no longer "justified" by the Council's own latest employment evidence and therefore cannot be considered 'sound'. A more flexible and pragmatic approach is now required for the managed loss of the functionally redundant surplus office accommodation that clearly exists in the Borough.</p> <p>1.6 In addition, it is evidenced that Independence House makes no contribution to the Richmond local economy or office market, and that its loss would have no material effect upon the overall demand/supply balance for office space across the Borough over the new Local Plan period, nor on the performance of the current office market in Richmond.</p> <p>1.7 Accordingly, its designation within a Key Business Areas and the overly restrictive approach outlined in Draft Policy 23 are not "justified" and therefore fail the test of 'soundness' and 'legal compliance'.</p> <p>1.8 In drafting these Representations, specific regard has been had to the requirements set out in the Council's response form and its guidance notes, together with policies in relation to plan-making set out within the NPPF.</p> <p>1.9 WGS would welcome early discussions with the Council regarding these Representations and amendments to the proposed policy and land use allocation.</p> <p><b>Section 2 Relevant Background and Site Information</b></p> <p><b>a) Background to the Site</b></p> <p>2.1 Independence House comprises a four-storey commercial office building (Use Class E) located along the southern side of Lower Mortlake Road outside of the Richmond 'Town Centre' boundary. Its full address is 84 Lower Mortlake Road, TW9 2HS. The accommodation is spread across ground to third floor and totals 1,103.5sqm of net office floorspace. The building has a main entrance along the frontage, with car parking to the rear and at basement level.</p> <p>2.2 The building is surrounded by residential properties, both along Lower Mortlake Road and to the rear, along West Sheen Vale. This includes at both the immediately neighbouring Eminence House (No. 76) and the upper floors of Vetro House (No. 90). To the west of Eminence House, Avalon House is an office building, but is understood to also be partly vacant.</p> <p>2.3 The site, together with its immediate context, is demonstrated at Figure 1.</p>  <p>Figure 1. Aerial view of Independence House site (Google Maps 2023)</p>	<p><b>Section 6 Changes Required to Make the Draft Local Plan 'Sound'</b></p> <p>6.1 By reference to Response Form Question 7, this section of the Representations identifies changes are required to make the Richmond Proposed Submission Local Plan sound and legally compliant insofar as draft policy 23 and the designation of KBAs is concerned. Specifically, the changes are required to ensure the plan is positively prepared, justified and consistent with National and London-wide policy as identified in the preceding section of this Statement.</p> <p>6.2 To address the concerns raised with regard to soundness and specifically the failure of the draft Local Plan to appropriately provide a mechanism whereby surplus office space can be used for other purposes, changes are sought in the context of spatial strategy and its supporting text. The specific changes required to make the plan 'sound' are as set out in the following Schedule of Required Changes (changes required shown in red underlined/struck through where relevant).</p> <p>Schedule of Required changes</p> <p><b>Draft Policy 23 'Offices' and Supporting Text</b></p> <p>A) "There is a presumption against the loss of office floorspace in all parts of the borough. <del>Proposals which result in a net loss of office floorspace will be refused.</del> Any refurbishment of existing office floorspace should improve the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) as set out in London Plan Policy E1.</p> <p>[Insert]</p> <p><del>The loss of office floorspace will only be accepted where such floorspace is surplus or no longer suitable for the purposes of meeting market demand. This must be demonstrated by satisfactory marketing evidence prepared in accordance with the requirements set out at Appendix 2 and evidence of demand and supply.</del> [End]</p> <p><b>Paragraph 19.19</b></p> <p><del>"Where a proposal involves a change of use involving the loss of office floorspace not supported by policy, the Council will require satisfactory marketing evidence together with sufficient evidence of demand and supply. An application is expected to set out why it is not suitable for continued commercial, business or service uses, and the site should be marketed both for its existing office use and alternative employment generating uses including as flexible, start-up or co-working space. Prices should be based on the local office market and on the existing quality of the accommodation. A full and proper marketing exercise can be submitted in accordance with the marketing requirements in Appendix 2. Such evidence will be a material consideration, however provision of marketing in itself does not justify an exception to policy."</del></p> <p><b>Paragraph 19.24</b></p> <p><del>This paragraph is no longer considered necessary in the light of the existing Article 4 direction and Policy 23.</del></p> <p><b>Paragraph 19.25</b></p> <p><del>Omission of "84 Lower Mortlake Road, Richmond" from list of Key Business Areas. Page 258 'Policy Map Designations' Updated to include "Independence House, 84 Lower Mortlake Road has been removed as there is no existing office use".</del></p> <p>[See comment 565 on Appendix 2 marketing requirements]</p> <p><b>Proposed Policies Map</b></p> <p><del>Removal of the 'Key Business Area' designation to Independence House, 84 Lower Mortlake Road.</del></p> <p>6.3 Early discussion with the Council with regard to the Representations made and suggested changes would be welcomed.</p>
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2.4 The current (adopted) Richmond Local Plan (July 2018) identifies the site to be situated within a 'Key Office Area' ("KOA"), together with the two buildings to the west, as shown at Figure 2 below (namely Avalon House and Eminence House). The middle building, known as Eminence House, is now in sole residential use.



Figure 2. Extract from Adopted Local Policy Map

2.5 Independence House was constructed in the mid-1980s and was owned and occupied by WGS as their London HQ offices. By 2019 the building became extremely dated and beyond economic refurbishment. As a result, the business reviewed their position and decided to relocate their head offices to a location within Richmond Town Centre (the Old Court House, Parkshot) given its improved facilities and access to the retail and transport connections within the town centre. Independence House has remained vacant since December 2019, which is now 43 months – at the time of writing the building has been marketed extensively since August 2020 (35 months) by Stirling Shaw Real Estate Consultants, which has identified no credible interest for the building's reoccupation, as summarised in the Marketing Report.

**b) Planning history**

**i) The site**

2.6 The planning history for the site is extensive, with a list of the applications available online provided at [Appendix 1](#) [See Appendix 8 to this schedule]. It is understood from the evidence available that the building was built pursuant to a planning permission granted in 1987 (ref: 87/427), which allowed for the construction of a part two-storey, part three-storey, part four-storey office building with parking at basement and ground floor level for 40 cars. There was no restriction on the use of the building as offices attached to this decision.

2.7 A subsequent permission was granted in 2002 (ref: 01/2046/FUL) which allowed for the erection of an additional storey on the rear addition and infill of part of the undercroft. A revised planning permission was then granted in 2002 (ref: 02/1225) for the infill of part of the undercroft for office use. There were no restrictions on the use of the building as offices attached to either of these decisions. Accordingly, it is considered that the permitted use of the building is for Class E use under the Town and Country Planning (Use Classes) Order 1987.

2.8 Most recently, planning permission was granted in 2021 (ref: 20/3359/FUL) for the "extension of the existing office building to provide a new entrance, enlarged office space and external terraces" to assist in the building competing with higher grade offices in the Town Centre and to assist in finding suitable tenants. However, following grant of this permission (and as explained in further detail in the Marketing Report) it was identified that the works would be unviable due to the costs required to carry out the works, prevailing market conditions and the lack of identified demand for office space in this location. Accordingly, WGS have not implemented this permission which is considered financially unviable for the foreseeable future and does not intend to take it forward.

**ii) Surrounding area**

2.9 Planning permission was granted in 1997 (ref: 97/1106) for the development of 72 Lower Mortlake Road (known as 'Avalon House') for office and residential use. A subsequent planning permission was then granted in 1998 (ref: 98/1856) for the development of a 3-storey building for office use only, which we understand authorises the current building. A Certificate of Lawfulness was issued in 2006 (ref: 06/0565/ES191) confirming that the use of the building was as offices within Use Class B1 which is its current use.

2.10 76 Lower Mortlake Road (known as 'Eminence House') was redeveloped following the grant of planning permission in 2004 (ref: 04/1387/FUL) to provide a 5-storey building with residential on the upper floors and 400sqm commercial space at ground floor. The planning permission was varied on multiple occasions, with the latest being in 2008 (ref: 08/0679/FUL). Since its development, applications have been submitted seeking the change of use of the ground floor commercial units. This includes in 2013, where a prior approval was granted (ref: 13/2655/P3JPA) allowing its use as residential accommodation. This is understood to have been implemented and the current use of the building is residential.

2.11 Planning permission was granted in 2004 (ref: 04/1498/FUL) for the development of a 4-storey building comprising residential properties and 215sqm commercial space at 86-98 Lower Mortlake Road (known as 'The Vetro'). The upper floors are currently in residential use.

**iii) Pre-application advice request, 2022-2023**

					<p>2.12 Pre-application discussions were held with Richmond Council in 2022-2023 to discuss the acceptability of converting Independence House to residential use. In their written response, Council officers were of the view that the proposals would not be acceptable in the context of Policy LP41 despite extensive marketing evidence being provided to demonstrate the lack of demand for the site for commercial use.</p> <p>2.13 In reaching this position it was set out that <i>“the criteria relating to submission of marketing evidence in Part A of the policy do not generally apply to sites located in Key Office Areas, where net loss of floorspace will not normally be permitted and the Council would reiterate that the principle of loss of office development here is not supported in principle”</i> (our underlining). In taking this view, Officers reference the outcome of a recent appeal in the Borough at Mega House (ref: APP/L5810/W/21/3283294), within which the Inspector gave great weight to the evidence (ELPNA 2021 at the time) of the emerging Local Plan in the absence of evidence to the contrary. It is noted that this evidence base has now been updated and that evidence challenging the interpretation of the updated evidence base is included within these Representations.</p> <p><b>c) Marketing Report by Stirling Shaw (June 2023)</b></p> <p>2.14 As set out above, Independence House has not been occupied since WGS vacated the premises in December 2019 and relocated to better situated and higher quality premises in Richmond Town Centre. The building has been subject to extensive active marketing that commenced in August 2020 by Stirling Shaw Retail Estate Consultants. The methods undertaken, together with the outcome of this, are set out in the Marketing Report (June 2023) prepared by Stirling Shaw, enclosed at <a href="#">Appendix 2</a>. The report considers the site in the context of the local market in Richmond and sets out the following conclusions:</p> <ul style="list-style-type: none"> <li>• There is a chronic over supply of Grade A offices in the Draft Local Plan Town Centre Area and the current supply chain stands at ~263,000 sqft of offices available in the next 12 months.</li> <li>• Average take up for the last 3 years is approximately 22,000 sqft per annum.</li> <li>• Unless there is a dramatic increase in demand and a “lettings bonanza”, it will take approximately 11.8 years for the current supply to be absorbed.</li> <li>• Since the building became vacant in 2019, every effort has been made to maximise the commercial/employment generating opportunities, including obtaining planning permission to expand and fully refurbish the whole building, which cost WGS over £60,000 in professional fees just to obtain planning permission.</li> <li>• Due to severely escalating build costs and ‘open ended’ marketing/vacancy periods it is not financially viable to speculatively implement the consented, speculative office scheme.</li> <li>• There is demand/interest from office occupiers but each party has ultimately dismissed the subject property in favour of offices located in central Richmond, or similar towns such as Chiswick, Hammersmith and Wimbledon.</li> <li>• There is demand from other sectors such as nursery providers but due to a lack of sufficient external space the building is not suitable.</li> <li>• For as long as there are competing Grade A offices available in the Draft Local Plan Town Centre Area, Independence House will remain vacant as tenants elect to be located in central Richmond.</li> <li>• Downgrading the specification and offering the subject property to let at a lower rent is not economically viable and it will still complete with over 65,000 sqft of Grade B offices available to let in Richmond Town Centre.</li> </ul> <p>2.15 Stirling Shaw therefore reach the overarching firm view that, whilst the building has the potential to be let to a Class E occupier, the property will remain vacant for the foreseeable future and it is not financially viable to implement the consented scheme.</p> <p><b>d) Summary</b></p> <p>2.16 The following key points are drawn from this section:</p> <ul style="list-style-type: none"> <li>• Independence House was developed in the 1980s for office purposes. No condition was attached to the approved permission restricting the use of the building and therefore it has an unrestricted Class E use.</li> <li>• Whilst a condition was attached to the recent permission for refurbishment works restricting the use of the building to Classes E(e) and E(g), this consent has not been implemented nor does our client intend to do so in the future as it is not viable.</li> <li>• Whilst the site is located within a defined Key Office Area, of the three buildings contained within this designation, only one is currently occupied for office use. Independence House has been vacant since late 2019x and Eminence House is in now residential use.</li> <li>• Since WGS vacated the unit in December 2019 it has remained vacant despite a comprehensive marketing campaign being undertaken by Stirling Shaw. This is expressed in the Marketing Report, which concludes that, despite the site’s allocation as a Key Office Area, it is not sequentially attractive to tenants who would prefer to locate within Richmond Town Centre where they would be closer to the train station and amenities.</li> <li>• The number of appeals relating to the position of Local Policy LP41 are limited. However, a recent appeal decision at Mega House indicated that the Inspector considered significant weight should be given to the findings of the ELPNA 2021 prepared to support the emerging Local Plan. However, the Inspector does observe in their decision that there was an absence of evidence to the contrary or a sufficiently robust marketing assessment, which are both contained within these Representations by WGS. Furthermore, it is evident the Inspector was willing to consider marketing evidence to justify the loss of office accommodation.</li> </ul> <p><a href="#">Section 3 Planning Policy Context</a></p>	
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					<p>3.1 The following provides a review of the key current and past planning policy documents relevant to the consideration of the proposed business/office policies and the relevance of retaining Independence House within a Key Business Area boundary.</p> <p>3.2 Those existing documents identified below are critical in the consideration of the ‘soundness’ and ‘legal compliance’ of the draft Local Plan.</p> <p><b>a) National Planning Policy Framework (NPPF, 2021)</b></p> <p>3.3 In order for the draft Local Plan to be considered ‘sound’ it is required to be “consistent with national policy”. Those policies within National Planning Policy Framework (NPPF, 2021) considered relevant are outlined below.</p> <p>3.4 <b>Paragraph 16</b> sets out that plans should (inter alia) be prepared with the objective of contributing to the achievement of sustainable development; be prepared positively, in a way that is aspirational but deliverable; and contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.</p> <p>3.5 <b>Paragraph 31</b> states that:  <b>“the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take account relevant market signals”.</b></p> <p>3.6 <b>Paragraph 35</b> sets out the requirement that Local Plans need to be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. They are ‘sound’ where they are:  <b>a) Positively prepared</b> – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;  <b>b) Justified</b> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;  <b>c) Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and  <b>d) Consistent with national policy</b> – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.” (our underlining)</p> <p>3.7 Section 6 relates to the economy. Within this <b>Paragraph 81</b> sets out that:  <b>“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”</b></p> <p>3.8 <b>Paragraph 82</b> goes on to say:  <b>“Planning policies should:</b>  <b>a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;</b>  <b>b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;</b>  <b>c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and</b>  <b>d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”</b></p> <p>3.9 Section 11 relates to making effective use of land. <b>Paragraph 119</b> sets out that:  <b>“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”</b></p> <p>3.10 <b>Paragraph 120</b> goes on to say that ‘Planning policies and decisions should: (inter alia)  <b>“c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;</b>  <b>d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).”</b></p> <p>3.11 <b>Paragraph 122</b> sets out the following:  <b>“Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability.”</b></p>	
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					<p><b>b) London Plan (2021)</b></p> <p>3.12 In order for the draft Local Plan to be ‘sound’ and ‘legally compliant’ it must also be in general conformity with the London Plan.</p> <p>3.13 The key London Plan policies relevant to the designation of Independence House within a Key Business Area and the Council’s approach to its office protection policy are summarised below.</p> <p>3.14 <b>Policy E1 ‘Offices’</b> (Part E) sets out that existing office floorspace capacity in locations outside the areas identified in Part C (note: Independence House is not covered by Part C) should be:  <b>“retained, supported by borough Article 4 Directions to remove permitted development rights where appropriate, facilitating the redevelopment, renewal and re-provision of office space where viable and <u>releasing surplus office capacity to other uses</u>”.</b> (our underlining)</p> <p>3.15 Part I goes on to state that:  <b>“The redevelopment, intensification and change of use of <u>surplus office space to other uses including housing is supported</u>, subject to the provisions of Parts G and H.”</b> (our underlining)</p> <p>3.16 For completeness, the provisions referred to are as follows:  <b>“G: Development proposals related to new or existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace  H: The scope for the re-use of otherwise surplus large office spaces for smaller office units should be explored.”</b></p> <p>3.17 Surplus Office Space is defined at paragraph 6.1.7 as follows:  <b>“Surplus office space includes sites and/or premises where there is <u>no reasonable prospect of these being used for business purposes</u>. Evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply, and <u>evidence of vacancy and marketing (at market rates suitable for the type, use and size for at least 12 months, or greater if required by a local Development Plan Document)</u>. This evidence should be used to inform viability assessments.”</b></p> <p><b>c) Existing Richmond Local Plan (2018) (‘2018 Local Plan’)</b></p> <p>3.18 Adopted <b>Policy LP41</b> relates to offices and confirms at Part A that there is a presumption against the loss of office floorspace in all parts of the Borough. It goes on to set out that any loss of office space (on sites outside the designated KOAs) will only be permitted where two criteria are met: there is robust and compelling evidence showing there is no longer demand; and a sequential approach to redevelopment or change of use is applied. With regards to sites within KOAs, it sets out that:  <b>“Net loss of office floorspace will not be permitted. Any development proposals for new employment or mixed use floorspace should contribute to a new increase in office floorspace where feasible. Criteria 1 and 2 in A (above) do not apply to the Key Office Areas”</b></p> <p>3.19 Supporting Paragraph 10.2.7 confirms that the KOAs have been designated due to their particular importance for office employment space. Paragraph 10.2.8 goes on to identify that the Council will not permit loss of office space in these areas and development of new office space is encouraged.</p> <p>3.20 The designation of ‘Key Office Area’ was introduced by the Council in the 2018 Local Plan, predominantly to reflect land covered by the Article 4 direction adopted in 2016 restricting the conversion of properties in the Borough from office to residential. The allocations were also supported by the evidence base to the 2018 Local Plan, which included an ‘Employment Sites and Premises Study’ prepared by Peter Brett Associates in 2016. Prior to the 2018 Local Plan, local policy had a mechanism in place for the loss of employment space Borough-wide where certain parameters were met (<b>Local Policy DM EM2</b>). This set out that:  <b>“The use of employment land for other purposes will only be permitted where:</b>  <b>(a) There is satisfactory evidence of completion over an extended period of time of a full and proper marketing exercise of the site at realistic prices both for the existing use and for redevelopment (if appropriate) for other employment uses; or suitable alternative evidence; and either</b>  <b>(b) A sequential approach has been applied to the development of the site as follows:</b>  <b>i) solely employment-based redevelopment;</b>  <b>ii) mixed-use or other alternative employment creating uses, where the employment floorspace is retained. Such sites should maximise the amount of affordable housing provided as part of the mix;</b>  <b>iii) maximum provision of affordable housing in accordance with CP19;</b>  <b>Or</b>  <b>(c): The location has such exceptionally severe site restrictions due to very poor access and servicing arrangements that its continued employment use would be inappropriate.”</b></p> <p>3.21 Correspondence regarding the current adopted business policies was had during the examination of the 2018 Local Plan prior to its adoption. In their written response following Hearing 6, the Council replied to a query on whether the economic policies provide adequate flexibility for potential changing circumstances by arguing that the policies put a strong emphasis on applications to demonstrate that there is no longer demand for an employment use on the site through the provision of marketing evidence.</p> <p>3.22 It was also asked of the Council whether robust evidence supports Policy LP41 and whether the Borough-wide approach to office floorspace was justified and consistent with national policy and the London Plan. In responding to this the council set out that:  <b>“The evidence base categorically demonstrates the sheer scale of the recent losses in B1a Office space within the borough, alongside growing demand requirements particularly from small and medium sized businesses. Both the</b></p>	
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**Employment Sites and Premises Reports produced by Peter Brett Associates found that the growing demand requirements and tightening of office supply supports the Council’s proposed robust approach to resist the loss of office floorspace through strong policy retaining offices in the town centres and newly designated Key Office Areas.”**

3.23 Subsequent to these responses, in considering this matter the Inspector concluded in their report on the 2018 Local Plan that:

**“Within KOAs, the policy states that the net loss of office floorspace will not be permitted. Whilst there is some variation in rental levels and yields in some areas, such as around Electroline House, the overall thrust of the evidence supports a robust approach towards retaining the employment uses within KOAs which is justified adequately by the available evidence. Whilst the aim to increase the net supply of office floorspace in mixed use redevelopment proposals is supported by the level of general need in the Borough, this should reasonably apply where the characteristics of the site and the development make it feasible rather than a predetermined requirement. For reasons of effectiveness I recommend accordingly”.**

3.24 The 2018 Local Plan was adopted in the context of the London Plan 2016, which has since been superseded by the London Plan 2021. Within the 2016 version, **Policy 4.2** related to offices and sought to enhance the office provision in the City to attract businesses of different types and sizes including small and medium sized enterprises. It went on to promote the provision of new capacity and encourage renewal and modernisation in viable locations and supporting changes of surplus office space to other uses. With regards to residential conversions the policy only made reference to the need to identify the need to monitor the impact of Permitted Development rights for changes of use from offices to residential and how this would impact on the office stock in the City.

**d) Current Planning Policy Overview**

3.25 The following key points can be drawn from the existing planning policy framework:

- The NPPF provides that plans need to be based on proportionate evidence and be in accordance with national policy. In this regard, Paragraph 16 requires policies to be clearly written and unambiguous, with the policies relating to the economy requiring plan policies to be flexible to suit future needs not anticipated in the plan. Section 11 goes on to require that development of underutilised land and buildings should be supported, especially where it meets an identified housing need. Paragraph 122 further outlines that policies need to reflect changes in the demand for land.
- At a London level, the current London Plan was adopted in 2021, with Policy E1 confirming that the change of use of surplus office space to other uses including housing is supported subject to demonstration that there is no alternative viable commercial use. This is an update on the policy position in the 2016 London Plan, which was in force when the 2018 Local Plan was adopted, and which focussed on the enhancement and modernisation of existing office stock. Paragraph 6.1.7 indicates that surplus office space can be identified by 12 months vacancy and marketing to demonstrate that there is no realistic prospect of a site being used for business purposes.
- The 2018 Local Plan Policy LP41 provides a mechanism for converting unused office stock where it can be shown there is no longer a demand. It does, however, provide that this is not applicable in the defined KOAs irrespective of the evidence given. However, as detailed at Section 2 of this statement there are appeal cases within which Inspectors have taken the view that, despite this Policy, an assessment of the marketing evidence would be appropriate. This is also implied in the written pre-application response relating to Independence House in 2023, where in considering the principle of development officers suggested that the marketing requirements set out in Part A of the policy ‘do not generally apply to sites in the KOAs’.
- The allocation of Independence House as a Key Office Area was introduced in the 2018 Local Plan and reflects the boundaries of Article 4 directions adopted in 2016. At this time the building was in full time occupation by WGS as their head office. Since the adoption of the 2018 Local Plan this position has changed, with the building now having been vacant and comprehensively marketed for a significant period of time. An up-to-date Article 4 direction remains in place, which would prevent its unrestricted conversion under permitted development rights, although as Lichfields highlight at Para 3.8 of their Employment Evidence the continued inclusion of Independence House within this was not informed by an up-to-date evidence base.

**Section 4 Evidence Base and Draft Policy**

4.1 This section provides a summary of the key evidence base documents associated with the draft Local Plan process relevant to these Representations. It considers the evolution of the draft Policy relating to office space through the adopted Local Plan Policies and the Local Plan Review process at ‘Regulation 18’ Stage and now at ‘Regulation 19’ Stage. A comprehensive review of the ELPNA (2021 and 2023) is undertaken within the Employment Evidence review by Lichfields.

**a) Evidence Base Documents for Reg 18 consultation**

**i) Employment Land and Premises Needs Assessment 2021 (‘ELPNA 1’)**

4.2 The ELPNA 1 was prepared to update the economic need for land and floorspace in Richmond. The report was prepared with the view that no prospect of significant new land would be identified for development and therefore the plan would need to facilitate the intensification of space.

4.3 The report suggested a minimum office need of 73,000sqm at Paragraph 4.99 and as a result it concluded that a continued strong employment land protection policy would be needed, setting out that:

**“For both offices and industrial the Borough is hampered by a lack of development sites and a negative pipeline. The London Plan has looked to tighten employment policies and particularly for industrial uses which may help**

					<p>control future losses. The Borough however will struggle to deliver net additional space, especially for logistics firms...</p> <p>Therefore, in the absence of sites, the Council will need to rely on windfall redevelopment proposals to meet economic needs. The use of windfall sites is well established as a route to deliver new homes, but has not been explicitly cited as a source to meet economic needs. We suggest amending and strengthening the Borough's main employment policies (LP40, 41 and 42) to require net additional employment space following a sequential approach."</p> <p>4.4 No specific reference is made to Independence House or the wider designation along Lower Mortlake Road in this document.</p> <p>ii) <u>Local Housing Needs Assessment (stage 1) (LHNA, 2021)</u></p> <p>4.5 The objective of the document was to assess the housing requirement for the borough over the new plan period. This was undertaken on the understanding that it would need to be in general conformity with the London Plan.</p> <p>4.6 The report concludes at Paragraph 9.5 that the new Local Plan will be required to be in general conformity with the new London Plan which seeks to prioritise building new homes and sets out a housing target of 4,110 homes over the period to 2029 (equal to 411 homes per annum). It goes on to suggest that if a target is required by the 10-year period, Boroughs are advised to draw on the 2017 SHLAA findings and any local evidence of identified capacity.</p> <p><b>b) Evidence Base Documents for Reg 19 consultation</b></p> <p>i) <u>Employment Land and Premises Needs Assessment 2023 ('ELPNA 2')</u></p> <p>4.7 An updated ELPNA was prepared ahead of the Reg 19 consultation. This sought to update the position following ELPNA 1 and ensure that the findings were drawn on the most up-to-date economic forecasts. With regards to office floorspace it concludes that:</p> <p><b>"The position for offices is more complex as the economic need for office jobs has risen, albeit from a relatively low base, but the market continues to experience sustained rates of vacancy and stock losses that are at rates that cannot be ignored.</b></p> <p><b><u>This has led to the shift in approach to the identification of office floorspace need, taking a more pragmatic approach whereby future losses are set aside and surplus vacant existing floorspace could be recycled for office (the short-term supply) or for other uses, up to the point where in an upturn in demand the available supply approaches the 7.5-10% mark. At that point the Council is justified to employ a more stringent policy to resist losses. Overall future need for office floorspace has fallen substantially from the 73,000 sqm identified in the 2021 ELPNA to 23,000 sqm today. In the short term this can be delivered through the existing stock, which has a sustained high level of availability/vacancy. In the mid-long term, given the lack of new sites for office, the Council should ensure that office use is part of the mix of uses identified for the major mixed-use development sites, of which the Borough has very few."</u></b> (our underlining)</p> <p>4.8 It is referenced at Paragraph 3.98 that up to 15,000sqm office floorspace could be lost before the 10% mark is reached. A detailed review of this is provided within Section 2 of the Employment Evidence review by Lichfields.</p> <p>ii) <u>Local Housing Needs Assessment (LHNA, 2023)</u></p> <p>4.9 This report was prepared to account for selective further analysis of housing dynamics, where appropriate, to consider supporting living needs and in the context of a restricted supply of housing, to consider a 'local hierarchy of need' to help guide policies on the delivery of different types of homes in the Borough. It does not review the overall housing need identified in the 2021 report.</p> <p>iii) <u>Housing trajectory</u></p> <p>4.10 The latest Annual Monitoring Report was published in March 2023 and spans the 2021/22 year. It suggests that the Council have a 5-year supply of 5.3 years. This is based on sites under development, those with consent and those allocated for housing in adopted/emerging Plans and other identified sites coming forward.</p> <p><b>c) Regulation 19 Local Plan draft</b></p> <p>[See comment 359 on Policy 10]</p> <p>[See comment 371 on Policy 11]</p> <p>4.13 <b>Draft Policy 23</b> specifically relates to offices and identifies a need to retain offices, setting out that:</p> <p><b>"There is a presumption against the loss of office floorspace in all parts of the borough. Proposals which result in a net loss of office floorspace will be refused. Any refurbishment of existing office floorspace should improve the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) as set out in London Plan Policy E1."</b></p> <p>4.14 Supporting Paragraph 19.15 draws from the ELPNA 2 referring to a shortfall of circa 23,000 sqm of office floorspace but asserts that, whilst there is a reduced demand since the pandemic, there is a positive demand for the Plan period and a limited pipeline of supply. At Paragraph 19.17 it goes on to suggest that the policy approach to protecting existing office stock will apply where planning permission is required for a change of use, or to extensions and new development.</p> <p>4.15 Paragraph 19.19 considers marketing and sets out that:</p> <p><b>"Where a proposal involves a change of use not supported by policy, the Council will require satisfactory marketing evidence. An application is expected to set out why it is not suitable for continued commercial, business or service uses, and the site should be marketed both for its existing office use and alternative employment generating uses including as flexible, start-up or co-working space. Prices should be based on the local office market and on the existing quality of the accommodation. A full and proper marketing exercise can be submitted in accordance with</b></p>	
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					<p><b>the marketing requirements in Appendix 2. Such evidence will be a material consideration, however provision of marketing in itself does not justify an exception to policy.”</b></p> <p>4.16 This indicates that marketing evidence can be a material consideration, regardless of whether the site is located in a KBA. <b>Draft Appendix 2</b> sets out the marketing evidence that would be needed to consider the conversion of employment space within the borough. This includes a section on Classes E(g)(i) and E(g)(ii). However, following this list paragraph 28.10 sets out that:</p> <p><b>“Please note that provision of marketing will not be accepted as justification for an exception to policy; there should be no net loss of office floorspace.”</b></p> <p>4.17 This paragraph is then repeated at Paragraph 28.12, under a heading relating to industrial land and which does not relate to office floorspace.</p> <p>4.18 At Page 259 reference is made to the Article 4 directions in the borough restricting the conversion of commercial buildings to residential through Class MA of the GPDO. The approach taken for this Article 4 was to cover the current ‘Key Office Areas’, and the plan confirms that these would be renamed as ‘Key Business Areas’ to reflect the newly formed Class E. All of the sites originally contained in the 2018 Local Plan ‘Key Office Areas’ except one (38-42 Hampton Road) have been included, to include 72-84 Lower Mortlake Road, Richmond.</p> <p>4.19 The remaining paragraphs 19.26 and 19.27 note that the provision of office floorspace remains a priority in town centres and that Richmond Town is the borough’s main office market. However, no specific mention is given to the reasoning for the protection of out of centre KBAs or whether the Council has reviewed whether these sites are still appropriate for the designation.</p> <p><b>D) Evidence Base overview</b></p> <p>4.20 The points relevant to the issues raised relating to Independence House are as follows:</p> <ul style="list-style-type: none"> <li>• Housing needs assessments have been undertaken to support the draft Local Plan. These confirm that the identified need for the area directed in the London Plan is appropriate and suggests the range of need that would reflect the existing demographic.</li> <li>• Two assessments have been prepared regarding employment land needs. The ELPNA 1 was prepared in 2021 in the context of the Covid-19 pandemic and suggested a shortfall of 73,000sqm office floorspace. It therefore advocated the strengthening of the local policy provision on business floorspace loss. The ELPNA 2 prepared in 2023 suggests a significant reduction in the identified need to 23,000sqm and indicates that due to the increased level of vacancy there could be scope for the conversion of office floorspace to other uses outside of town centres and Article 4 areas, up to a point where the available supply reaches 7.5-10%. It identifies vacancy levels of 16.7%. The ELPNA 2 indicates that this would allow for a loss of 15,000sqm of existing office space in the Borough. However, no evidence is given to why KBAs outside town centres should be protected and the Policy drafting in this Regulation 19 consultation does not reflect these findings and is therefore not justified by the Council’s own evidence base.</li> <li>• Draft Policy 23 does not provide a mechanism for loss of surplus office space to reflect the findings of the ELPNA 2 <b>or the London Plan</b>. It seeks to restrict loss of office space Borough-wide irrespective of whether a site is located within a KBA or is no longer viable for its existing use with no reasonable prospect of office use in the future. The supporting text does suggest that marketing evidence can be used to make the case for loss of office floorspace; however that this would only be a material consideration and would not justify an exception to policy. This is repeated at Draft Appendix 2 (marketing evidence) which states that marketing will not be accepted as justification for an exception to policy and that there should be no net loss, which would not be in conformity with the London Plan or national policy. The policy and supporting text do not detail what information would be needed to justify loss of office or business floorspace; there is a blanket presumption against the loss of office space, albeit an acknowledgment that marketing evidence would be a material consideration and then a detailed appendix describing the requirements of such marketing. The policy, its supporting text and Appendix 2 therefore sit somewhat uncomfortably with one another; if the Council is acknowledging the relevance of marketing information to proposals for a loss of office space, it should be express in permitting a marketing-led exception to policy. The current approach is contrary to NPPF Paragraph 16 d) which requires policies to be clearly written and unambiguous, so it is evident how a decision maker should respond to development proposals.</li> <li>• In renaming the KOAs as KBAs, no justification is provided to whether the appropriateness of each area being re-allocated within the designation has been reviewed as part of the preparation process of the draft Local Plan. In particular, the evidence base has not been updated in respect of these relevant sites to justify this designation. The evidence base needs to be far more nuanced and specific in order to satisfy the requirements of NPPF paragraph 31 which requires plans to be underpinned by evidence which is “adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”</li> <li>• Notwithstanding the changes between ELPNA 1 and 2, the only change made to the policy was to remove reference to redevelopment proposals being required to contribute to a net increase in office floorspace.</li> </ul> <p><b>Section 5 Response on Legal Compliance and ‘Soundness’ of the Draft Local Plan</b></p> <p>5.1 Based on the details set out in the previous sections, we raise the following two principal matters with regards to the draft Local Plan:</p> <ul style="list-style-type: none"> <li>• That the allocation of Independence House, 84 Lower Mortlake Road as a Key Business Area is not justified or appropriate; and</li> <li>• That the Draft Policy 23 ‘Offices’ and its supporting text and Draft Appendix 2, is not justified by the Council’s own Evidence Base and is not in conformity with the NPPF or the London Plan.</li> </ul>	
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5.2 These matters are considered in turn below. In order to appropriately address these matters a peer review of the Council's evidence base on employment land (covering both ELPNA 1 and ELPNA 2) has been undertaken by Lichfields and attached at [Appendix 3](#). This 'Employment Evidence' (June 2023) review considers the robustness of the Council's evidence base in the context of the findings of the Marketing Report on Independence House by Stirling Shaw.

5.3 In considering the 'soundness' of the draft Local Plan it is important to note that the NPPF is clear in the context of preparing and reviewing plans and confirms at Paragraph 31 that:

**"the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take account relevant market signals".**

**a) That the allocation of Independence House within a KBA is not justified**

5.4 Page 258 of the draft Local Plan sets out that: *"The existing Key Office Areas will be renamed as Key Business Areas and retained on the Policies Map"*. An extract of the draft Local Plan Map is provided at Figure 3 below.



**Figure 3. Extract from draft Local Plan Map (Reg 19, 2023)**

5.5 Page 258 further notes that *"38-42 Hampton Road has been removed as there is no existing office use"*. (Our underlining).

5.6 Attention is drawn to this as the KBA within which Independence House sits is formed of a cluster of three buildings, as follows:

- Independence House (no. 84) – vacant since February 2020 with extensive marketing – no existing office use
- Eminence House (no. 74) – in sole residential use – no existing office use
- Avalon House (no. 72) – in office use, but not fully occupied

5.7 Accordingly, there is currently no office use within over two thirds of this proposed KBA allocation. It is considered that the Council has taken this forward as a legacy designation based on an assessment from 2015 (which informed the 2016 Article 4 direction but which is clearly not relevant, with Eminence House not being included within the 2021 Article 4 direction). The office market in Richmond has changed substantially in the last eight years, as has the situation across the three properties. In respect of Independence House, it has been vacant for over 3 years and has been through 35 months of extensive marketing. There is no objective assessment to justify the redesignation of these three buildings as a Key Business Area.

5.8 Furthermore, the Marketing Report by Stirling Shaw demonstrates that the site is not regarded as a preferred location for prospective tenants. It is one of a few commercial isolated buildings outside of the Richmond Town Centre and has to compete with sites of a similar size with better access to the shopping district and train station. Specifically, it concludes that:

**"For as long as there are competing Grade A offices available in the Town Centre, Independence House will continue to lose out as tenants elect to be located in central Richmond."**

5.9 This position is also emphasised by Lichfields in the Employment Evidence review, where it is concluded (at Paragraph 5.2.7) that:

**"The building's location on Lower Mortlake Road – an 'out of town' location in office market terms – is no longer attractive to office occupiers seeking accommodation in Richmond town centre. The building requires extensive refurbishment to bring it up to the minimum standard required by occupiers, although in the current market this remains financially unviable to proceed with."**

5.10 The report also concludes (at Paragraph 5.2.5) that:

**"Through its proposals for Independence House as a Key Business Area, the Publication Draft Local Plan has taken forward a legacy designation that was based on an assessment last undertaken eight years ago. Since then, the market has undergone significant structural change and the building has been vacant for the last three years. The continued designation of Independence House as a Key Business Area in the Publication Draft Local Plan is not supported or justified by the Council's evidence base nor the latest market signals presented in this report."**



						<p>5.11 It is clear that were the KBAs objectively reviewed as part of this Local Plan process and updated evidence base then it would have been identified that the building has been empty since WGS vacated in 2020 and not currently in office use. In the absence of evidence to the contrary, based on the evidence given in the Marketing Report by Stirling Shaw and Employment Evidence review by Lichfields, it is not considered that the rolling forward of this former designation (which has not been informed by any up-to-date analysis of the proposed KBAs) is justified or appropriate.</p> <p>5.12 Furthermore, it is evidenced that Independence House makes no contribution to the Richmond local economy or office market and has not done so for a number of years. The Employment Evidence review demonstrates that the loss of office floorspace at Independence House would therefore have no material effect upon the overall demand/supply balance for office space across the Borough over the new Local Plan period, nor on the performance of the current office market in Richmond.</p> <p>5.13 As such, by reference to Response Form Question 4, in this regard the draft Local Plan is not considered to meet the tests of 'soundness' set out in Paragraph 35 of the NPPF for the reasons identified above and summarised below:</p> <ul style="list-style-type: none"> <li>• <b>The Plan is not positively prepared:</b> It has not been undertaken using up-to-date evidence to justify designation of Independence House within a Key Business Area. No objective assessment of the building's economic significance to the local office market has been undertaken to justify the policy allocation.</li> <li>• <b>The Plan is not justified:</b> There is no detail identifying why these specific out-of-centre locations have been allocated as a Key Business Area. As such there is no clear audit trail as to why these sites have been brought forward and not reviewed in the light of recent significant changes to the employment market (as identified in the ELPNA 2) and the long-term vacancy of Independence House. If this were undertaken, it would be found that Independence House has been vacant for over 3 years with no reasonable prospect of being used for business purposes based upon the Council's and WSG's evidence. The 'sound' approach would be to therefore revise the boundaries of the KBAs to the defined town centres and business parks and provide ongoing reviews on the relevance of the designation of sites outside of these areas, such as Independence House, which should be removed from this designation. This position is also supported by the findings of Lichfields' Employment Evidence review (set out in more detail in b) below) which demonstrate that, in the context of the surplus of office floorspace which Lichfields forecast across the Local Plan period (challenging the position in ELPNA 2), the loss of Independence House from the Borough's office inventory would have no material impact on the Borough-wide demand/supply balance for office space.</li> <li>• <b>The Plan is not consistent with National or London-wide Policy:</b> The Plan is not consistent with NPPF and other relevant policy in particular with regard to: promoting a sustainable pattern of development; optimising the use of land no longer suitable for its existing use; and considering the specific locational requirements of different sectors in suitable accessible locations. Specifically, this relates to NPPF Paragraphs 82, 120 and 122. Paragraph 122 states that: <i>"Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability"</i>.</li> </ul> <p><b>b) <u>That the Draft Policy 23 'Offices' and its supporting text and Appendix 2, is not justified by the Council own Evidence Base and is not in conformity with the NPPF or the London Plan.</u></b></p> <p>5.14 Draft Policy 23 and its supporting text does not provide a mechanism for the conversion of surplus office space within the Borough, with it being stated that any proposals resulting in a net loss of office floorspace will be refused. It is considered that the Council's approach is not justified by its own evidence and that a more flexible and pragmatic approach is now required for the managed release of surplus office floorspace. As identified in the Employment Evidence review, office requirements over the plan period have significantly decreased and vacancy rates have increased above healthy levels. It is demonstrated that some loss of the surplus or functionally redundant office space, that clearly exists in the Borough (such as Independence House), is required to help the office market reach equilibrium.</p> <p>5.15 The policy as drafted has been prepared following the publication of two versions of the ELPNA, the latest of which was published in April 2023. The latest version identifies that whilst there is a need for business space in the Borough, this need is significantly less (68.5%) than that identified originally in 2021. It goes on to suggest that there could be some scope for the loss of office floorspace but limits this conclusion to locations outside the Article 4 areas in the short term until demand increases. Specifically, it considers this figure to be 15,000sqm, which is a significant material change when compared to the evidence put forward as part of the Regulation 18 draft Local Plan. Notwithstanding this, the only change made to the Council's drafting of Draft Policy 23 is to remove the requirement for redevelopment proposals to contribute to a net increase in office floorspace.</p> <p>5.16 While acknowledging that the ELPNA 2 has employed what appears to be a more pragmatic approach to estimating future office requirements, Lichfields have reviewed the evidence base and consider the analysis presented in terms of future office supply within the ELPNA 2 to be incomplete. They note that the ELPNA 2 only considered extant/unimplemented planning permissions in arriving at a figure for future office supply but consider that this significantly underestimates the overall scale of supply that could be available to meet office needs over the plan period. In particular, they consider that the omission of provision from identified mixed-use allocations in the Local Plan to be a key deficiency in the Council's evidence and, taking this into account on a conservative estimate, consider that the Borough's emerging office floorspace supply could total at least 46,060 sqm. When compared against the office floorspace need figure for the Local Plan period of 36,140 sqm identified in the ELPNA 2, this results in a surplus of 9,920 sqm of office floorspace which could be even higher if the proposed mixed-use allocations are able to deliver a greater quantum of office floorspace than has been conservatively assumed for their analysis. This is significant as it</p>
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					<p>demonstrates that the Borough’s pipeline of office space supply is more than sufficient in quantitative terms to accommodate the future office needs identified in the ELPNA 2.</p> <p>5.17 They also consider there to be no evidence to support the suggestion in ELPNA 2 that, despite the finding that the short-term efficient operation of the office market in the Borough would not be affected if some of the Borough’s existing vacant floorspace was lost, this short term loss of office space should only be allowed outside of the KBAs. Their key conclusions on this matter at Paragraph 5.2. are as follows:</p> <p><b>“The Council’s latest employment evidence, published in April 2023 as part of the ELPNA Update, identifies a requirement for 22,860 sq.m of office space over the study period to 2041, which is significantly lower in scale than that identified by the earlier 2021 ELPNA study.</b></p> <p><b>This updated evidence acknowledges the high vacancy rates that currently characterise the Borough’s office market, and recommends a notable change in approach through planning policy to respond to this, concluding that the short-term efficient operation of the office market in the Borough would not be affected if some of the Borough’s existing vacant floorspace was lost. Indeed, the evidence implies some loss of office space being required to help the office market reach equilibrium, and so be able to function more effectively. The ELPNA’s suggestion that this short term loss of office space should only be allowed outside of Key Office Areas/Key Business Areas is not justified by evidence nor the market reality that some of these areas (including Independence House) make no meaningful contribution to the Borough’s economy and office market.</b></p> <p><b>Despite this definitive conclusion, the Council’s proposed approach through the emerging Local Plan is to maintain its strict ‘no net loss of office floorspace’ policy which features in the adopted Local Plan but has proved to be wholly ineffective over recent years, with the overall stock of office space gradually declining. This approach is no longer justified by the Council’s own latest employment evidence and therefore cannot be considered sound. A more flexible and pragmatic approach is now required through proposed Policy 23 in order to respond to the significant supply of functionally redundant office space that exists across the Borough’s office market and to more effectively encourage provision of high-quality accommodation that better meets the needs of local businesses. An overly-protective approach towards retaining existing surplus office accommodation – such as Independence House – risks stymieing the ability of the market to deliver future office space of the type and location that is more aligned to modern business needs over the next Local Plan period. This runs counter to the provisions of National Planning Policy Framework (NPPF) paragraph 82 which requires policies to “allow for new and flexible working practices”.</b></p> <p>5.18 It is observed that Draft Policy 23 as currently worded seeks to strengthen the position adopted in the existing Local Plan (Policy 41). However, as detailed in the supporting evidence to these representations since the adoption of the 2018 Local Plan there have been significant changes to the market, including the implementation of Brexit and the changes to working practice following the Covid-19 pandemic, which have materially impacted the demand for office space and levels of supply. Indeed, it is considered that the evidence suggests that there is an oversupply of office accommodation in this location, with it projected that the supply in Richmond Town Centre could take nearly 12 years to be absorbed based on recent average take-up rates.</p> <p>5.19 Furthermore there is, as detailed in the policy review at Section 3 of this Statement, a clear policy drive both at National and London-wide levels to seek to protect existing office stock for employment uses on the understanding that flexibility is needed to allow for the conversion to other uses, to include housing, where appropriate. In particular, where there is surplus office accommodation or where there is no reasonable prospect of these being used for business purposes, as set out in London Plan Policy E1.</p> <p>5.20 If the draft Local Plan fails to continue the same policy approach as is adopted at national and Londonwide levels (i.e. to recognise and set out the parameters for when surplus office space can be considered appropriate for other uses), it is considered to fail to accord with the requirement at Paragraph 11 of the NPPF to apply a presumption in favour of sustainable development. For planmaking this means, amongst other things, that all plans should promote a sustainable pattern of development. It is also considered to be an unduly inflexible approach contrary to London Plan Policy E1, which identifies at Part I that conversion of offices to residential is supported where it is found not to be appropriate for a range of employment uses including subdivision.</p> <p>5.21 Accordingly, the proposed wording of Policy 23, which states that: <i>“Proposals which result in a net loss of office floorspace will be refused”</i>, is not considered to be justified by its evidence base and is not in conformity with the London Plan.</p> <p>[See comment 565 on Appendix 2 marketing requirements]</p> <p>5.25 With regards to the wider Draft Plan, it is considered that the wording of Draft Policy 23 contradicts the position of other sections. Of note:</p> <ul style="list-style-type: none"> <li>• It does not make a distinction between sites inside and outside of the suggested KBAs, instead setting out a blanket policy position resisting loss of office space across the Borough. It is therefore unclear why the designation of the KBAs is necessary going forward, with this having no impact on the use of the Article 4 direction to prevent conversion within the established areas to residential. While the ELPNA 2 suggests that short-term loss of office space could be justified outside the Borough centres/areas covered by Article 4 directions, this is not reflected in the draft policy and, in any event (as detailed above), Lichfields challenge the evidential basis for this finding.</li> <li>• It is implied at Paragraph 17.9 that use of office space for residential purposes could be acceptable subject to compliance with Policies 23 (“Offices”) and 24 (“Industrial Land”) and Policy 11 references employment sites specifically when considering affordable housing provision. However, this contradicts that Policy 23 does not provide a mechanism to convert business floorspace into residential use.</li> </ul>	
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						<ul style="list-style-type: none"> <li>The supporting text to Policy 23 suggests that marketing can be used, and the evidence needed in this regard is detailed in full at Appendix 2. However, the supporting text and Appendix 2 suggest that the provision of marketing will not be accepted as justification for an exception to policy and that there should be <u>no net loss of office floorspace</u>. No detail is given to what other information would be required. The Plan as drafted is therefore unjustified and does not provide a coherent process for when the loss of office space would be considered acceptable.</li> </ul> <p>5.26 As such, by reference to Response Form Question 4, in this regard the Draft Local Plan is not considered to meet the tests of 'soundness' for the reasons identified above and summarised below:</p> <ul style="list-style-type: none"> <li><b>The Plan is not positively prepared:</b> it does not respond to the position set out in the ELPNA 2, which identifies that managed loss of office space in the short term could be acceptable. Furthermore, the Marketing Report and Employment Evidence review (accompanying these Representations) identify that there needs to be more flexibility in Draft Policy 23 to reflect localised demand and the release of surplus office accommodation for more beneficial land uses. In terms of the plan as a whole there is a failure to define a coherent approach to when the loss of office space could be acceptable.</li> <li><b>The Plan is not justified:</b> The ELPNA 1 suggested that the policies relating to offices and business floorspace should be tightened in the light of the predicted need. The current wording of Draft Policy 23 would suggest that it has been informed by this recommendation. However, the position in the updated evidence base (ELPNA 2) has changed significantly in respect of demand and vacancy levels, and yet that this has not been reflected in the drafting of Draft Policy 23. While there has been some limited change to the supporting text to note the updated findings in the ELPNA 2, the policy wording has not changed between the Regulation 18 and Regulation 19 drafts other than to remove a requirement for proposals involving redevelopment of office sites to provide a net increase in office floorspace. Furthermore, as identified in the Employment Evidence review by Lichfields, there are deficiencies in the analysis presented in terms of future office supply within the ELPNA 2 and Lichfields find a surplus of office floorspace over the Local Plan period which weighs further in favour of less restrictive policy. In the light of this, the sound approach (and reasonable alternative) would be to detail within the Policy an appropriate mechanism for the managed release of surplus office space across the Borough and the form of evidence that would be necessary to do so. In addition, a blanket objection to the loss of offices in KBAs is also not justified by the Council's own evidence.</li> <li><b>The Plan is not consistent with National or London-wide Policy:</b> the position taken by the draft Local Plan is contrary to the position in the London Plan, which identifies that conversion of surplus office space to residential is supported, subject to clear provisions within the policy wording. It is also contrary to Paragraph 120 of the NPPF, which emphasises that policies should promote and support the development of under-utilised land and buildings, and Paragraph 16 of the NPPF, with Draft Policy 23 and its supporting text and appendices providing competing positions, partially opening the door to making an evidence-based case for loss of office space but without providing a clear mechanism for the reuse of surplus office space.</li> </ul> <p><b>c) Summary</b></p> <p>5.27 From review of the evidence base and Draft Local Plan, it is concluded that the policies and supporting text relevant to office space (Draft Policy 23 and at Appendix 2) are not 'sound' or 'legally compliant'. This is both with regards to the specific allocation of Independence House within a Key Business Area and the lack of an unambiguous mechanism to justify the loss of surplus office space. Specific changes sought to the Regulation 19 Local Plan to address these matters are provided at Section 6 of this Statement.</p>		
411	Gerard Manley (Firstplan), <b>Baden Prop Limited</b>	Policy 23 and KBA's inclusion of Westminster House, Employment Land and Premises Needs Assessment (2021 and 2023 versions) Urban Design Syudy (2021 and 2023)	No	No	Yes	Positively Prepared; Justified; Consistent with national policy	<p>[See comment 250 on Site Allocation 25]</p> <p><b>ii. KBA's inclusion of Westminster House – Designation is not justified</b></p> <p>As above, the office levels (1 and 3) at Westminster House have experienced long periods of vacancy in previous years (23 and 18 months respectively). In addition, as outlined in <b>Table 1</b>, there is a considerable number of properties (former office uses) currently on the market and vacant a short distance from our client's site.</p> <p>Further to this, the London Plan's supporting text for Policy E1 (at paragraph 6.1.2) acknowledges that the office market is undergoing a <b>"period of reconstructing"</b> with (amongst other evolutive changes) <b>"changing work styles supportive by advances in technology"</b>. This has no doubt fuelled the significantly lower for office floorspace reported in the 2023 Employment Land and Premises Needs Assessment.</p> <p>As such, we do not consider that there is sufficient justification to retain the destination of KBA (albeit changed from KOA) for Westminster House. The test for soundness is summarised below:</p>	<p>[See comment 250 on Site Allocation 25]</p> <p><b>ii. Proposed Policy Map Changes</b></p> <p><b>KBA:</b> Removal of the 'Key Business Area' designation (i.e. redrawing the boundary to exclude) in relation to Westminster House.</p> <p><b>iii. Proposed Changes to draft Policy 23 and supporting text</b></p> <p><b>POLICY 23 TEXT:</b></p> <p><u>Original Policy Text:</u></p> <p>"There is a presumption against the loss of office floorspace in all parts of the borough. Proposals which result in a net loss of office floorspace will be refused. Any refurbishment of existing office floorspace should improve the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) as set out in London Plan Policy E1.</p> <p><u>Suggested Additional Policy Paragraph:</u></p> <p><b>(add:</b> <i>"The loss of office floorspace for residential use will be acceptable where robust and compelling evidence confirming that there is no longer any office demand for the floorspace following a marketing exercise of two continuous years (inline with the requirements in Appendix 2) has been undertaken prior to the submission of a planning application."</i></p> <p><b>SUPPORTING PARAGRAPH 19.19:</b></p> <p>"Where a proposal involves a change of use (<b>omit:</b> <i>'not supported by policy'</i>), the Council will require satisfactory marketing evidence. An application is expected to set out why it is not suitable for continued commercial, business or service uses, and the site should be marketed both for its existing office use and alternative employment generating uses including as flexible, start-up or co-working space. Prices should be based on the local office market and on the existing quality of the accommodation. A full and proper marketing exercise can be</p>

						<p style="text-align: center;"><b>The Plan is not prepared positively</b></p> <p>The designation of KBA hasn't been suitably informed by the available upto date evidence base. No objective assessment of the current economic output of this building (which is currently longstanding circa 66% vacant) has been undertaken, nor has any acknowledgement of the current available properties (former offices) to let / purchase in the local vicinity.</p> <p style="text-align: center;"><b>The Plan has not been justified</b></p> <p>The draft Local Plan is absent of any justification as to why the entirety of the KBA area has once again been included in this redesignation. The sound approach would be to undertake a bespoke assessment of each property to be included would need to be included to justify such inclusion which has not been undertaken, whereby it would be concluded that Westminster House (and potentially other sites) should not fall within this designation.</p> <p style="text-align: center;"><b>The Plan is not consistent with National or London-wide Policy</b></p> <p>In including Westminster House within this designation, the Plan fails to fall inline with the paragraph 125 of the NPPF in not optimising the use of land to meet an identified need for housing, as does it fail to accord with paragraph 120 (Part D) in promoting and supporting the development of under-utilised land and buildings.</p> <p><u>iii. Draft Policy 23, Offices – Stronger / more restrictive policy word over adopted position is not justified and wording not consistent with the NPPF or the London Plan.</u></p> <p>As outlined in preceding sections, in the 2023 Employment Land and Premise Needs Assessment, there is significantly less demand for new office floorspace than had been suggested two years prior. Indeed, the assessment considered that there could even be a further loss of existing stock (upto 15,000 sq m) before it would be necessary to strengthen adopted office floor protection policies.</p> <p>Notwithstanding this, this draft policy is more strongly worded and more restrictive than the adopted Policy, LP 41 position, with the removal of the mechanism to convert existing offices to other uses with robust and compelling accompanied vacancy / marketing information. This stronger wording is not considered to be guided by the most up to date evidence base, nor by the London Plan's acknowledgement of the office market's: <b>"period of reconstructing"</b> and: <b>"changing work styles"</b>, quoted in the preceding subheading of this letter.</p> <p>It is also noted in the supporting text for policy (at paragraph 19.17) that the provision of marketing evidence would form a <b>"material planning consideration"</b> in proposing a change of use which isn't supported by policy. With this in mind, it is clearly that RBT appreciate the value a robust demonstration of vacancy / marketing evidence and is it unclear why therefore this mechanism has not been included in the office policy. The test for soundness is summarised below:</p> <p style="text-align: center;"><b>The Plan is not prepared positively</b></p> <p>It is considered that Policy 23 should be more flexible to reflect specific building requirements and to acknowledge the long-term vacancy of each office unit, as opposed to an unfounded, blanket restriction for loss of office.</p> <p style="text-align: center;"><b>The Plan has not been justified</b></p> <p>The change in policy wording between the adopted LP 41 and Policy 23 sees the removal of a mechanism to allow a loss of office floor space subject to the provision of robust marketing information. This removal (hence the stronger wording / indeed higher protection of office floorspace) is unjustified given the updated data within the 2023 Employment and Premises Needs Assessment. It would be 'sound' to reinstate such a mechanism for when surplus office space could be released for other in-demand uses.</p> <p style="text-align: center;"><b>The Plan is not consistent with National or London-wide Policy</b></p> <p>National and London-wide policy levels are expressive in seeking to seek to protect existing office stock for employment uses. However, at these policy levels flexibility allows conversion to other uses (including housing) where appropriate, (as sited in the NPPF at paragraph 86 and the London Plan at Policy E1). The current drafting of this policy is not consistent with these policy levels.</p>	<p>submitted in accordance with the marketing requirements in Appendix 2. (<i>Omit: Such evidence will be a material consideration, however provision of marketing in itself does not justify an exception to policy.</i>)</p> <p><b>SUPPORTING PARAGRAPH 19.24:</b> It is suggested that this paragraph is no longer needed given the Article 4 Direction removing permitted development (Class MA of the GPDO).</p> <p><b>APPENDIX 2, PARAGRAPH 28.10</b> It is suggested that this paragraph is no longer needed given inline with the reasoning above. Overall BPL are confident that the above amendments would allow for the plan to be considered 'sound' and legally compliant.</p>
-	Jonathan Blathway, GLA on behalf	Policy 23 Offices				[See comment 402 in relation to office growth]	

	of Mayor of London							
-	Michael Amherst	Key Business Plan	No	No	No	Justified; Consistent with national policy; Effective	[See comment 407 in relation to Key Business Areas and the use of Article 4]	
-	James Sheppard (CBRE), LGC LTD						[See comment 401 in relation to Policy 23 and the LGC site]	
-	Kay Collins (Solve Planning), Port Hampton Estates Limited						[See comment 400 in relation to Policy 23 and Platt's Eyot]	
-							<b>Policy 24 Industrial Land</b>	
412	Summer Wong (RPS), Notting Hill Genesis	Policy 24 Industrial Land (p.261-262), Paragraph 19.29	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<p><b>Policy 24 Industrial Land (p.261-262)</b></p> <p>Policy 24 Part A) states <i>'there is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused. Any redevelopment proposals are required to contribute to a net increase in industrial floorspace.'</i></p> <p>As stated above, in 2020 the SoS requested the removal of 'no net loss' approach of industrial land from the London Plan 2021. The Policy 24 approach of 'no net loss' is contrary to the London Plan Policy E4 and should be removed. Moreover, the policy wording of Policy 24 in its current form is overly restrictive. The 'no net loss' requirement should be removed from Policy 24, with the promotion of net increase <u>where feasible</u>.</p> <p>Policy 24 Part B) refers to the requirement of 'affordable light industrial workspace in all major developments over 1,000sqm of employment floorspace'. This requirement differs slightly from Policy 25 which requires 'affordable workspace', rather than 'affordable light industrial workspace' in Policy 24. This requirement ignores the fact that employment development could offer a flexible form of employment other than light industrial use, and light industrial workspace might not be the most appropriate or compatible land use for a mixed-use development. It is recommended that Policy 24 Part B) should be removed in its entirety and the affordable workspace requirement will be covered under Policy 25.</p> <p>Paragraph 19.29 defines St Clare Business Park as one of the Locally Significant Industrial Sites (LSIS). Notting Hill Genesis obtained ownership of St Clare Business Park in 2016/2017 and have since then been actively marketing the site for employment use while promoting the redevelopment of the site. Whilst it is existing employment land, St Clare is in an established residential area with a number of constraints including narrow access through the residential streets of Windmill Road and Holly Road. The buildings on site are in poor condition where the majority of the employment floorspace on site has lain vacant despite an active marketing exercise since 2017.</p> <p>In October 2019, Notting Hill Genesis submitted a planning application (ref: 19/3201/FUL) for the redevelopment of the site for 112 residential units and 1,494sqm of commercial floorspace. The development received officer level support, but it was refused at committee level. The 2019 scheme (ref: APP/L5810/W/21/3278412) was dismissed at appeal on design grounds. The Inspector concluded that a redevelopment scheme with reduced provision of employment floorspace but in the form of a high quality flexible multi-functional commercial space would be an improvement to what currently exists on site. A current application (ref: 22/2204/FUL) addressing the Inspector's comment is currently being considered by the Council, for a proposed development of 100 residential units and 1,885sqm commercial floorspace.</p> <p>St Clare Business Park in its current condition has not been actively contributing to the Borough's employment capacity. It is clearly a development site and should therefore be removed from the LSIS designation.</p>	<p><b>Recommended Amendment</b></p> <p>Policy 24 Part A) <del>'there is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused.</del> Any redevelopment proposals <del>should seeks to are required to</del> contribute to a net increase in industrial floorspace <u>where feasible.</u></p> <p>Policy 24 Part B) <del>The Council will require the provision of affordable light industrial workspace within all major developments, over 1,000sqm of employment floorspace proposed (gross), in accordance with Policy 25 'Affordable, Flexible and Managed Workspace</del> Paragraph 19.29) remove <del>'St Clare Business Park, Holly Road, Hampton'</del> from the list of LSIS.</p>
-	Jonathan Blathwayt, GLA on behalf of Mayor of London	Policy 24 Industrial Land					[See comment 402 in relation to industrial floorspace]	
-	James Sheppard (CBRE), LGC LTD						[See comment 401 in relation to Policy 24 and the LGC site]	
-	Kay Collins (Solve Planning),						[See comment 400 in relation to Policy 24 and Platt's Eyot]	



	Port Hampton Estates Limited							
-							<b>Note comments on the St Clare (Hampton Hill) Mid-rise Zone in relation to the use of the business park which have been collated against the Place based strategy for Hampton &amp; Hampton Hill to group with similar comments.</b>	
-							<b>Policy 25 Affordable, Flexible and Managed Workspace</b>	
413	Summer Wong (RPS), <b>Notting Hill Genesis</b>	Policy 25 Affordable, Flexible and Managed Workspace (p.264-267)	No	N	N	Positively Prepared; Justified; Effective; Consistent with national policy	<b>Policy 25 Affordable, Flexible and Managed Workspace (p.264-267)</b> Policy 25 Part B) requires the provision of affordable workspace within major developments of over 1000sqm of employment floorspace (gross). Paragraph 19.50 states that off-site provision or financial contributions would be considered where it can be demonstrated robustly that this is not appropriate or feasible to provide affordable workspace on site. In line with London Plan Policy E3, Policy 25 should also take into account site specific circumstances and viability information. The main policy wording should be drafted so as to be mindful of competing development constraints and acknowledge that the provision of affordable workspace (or offsite contribution) will be subject to viability.	<b>Recommended Amendment</b> Policy 25 Part B Point 4) 'Requiring the provision of affordable workspace within major developments with over 1000sqm of employment floorspace proposed (gross), to be secured through planning obligations, <b>where viable.</b> '
414	Duncan McKane, <b>London Borough of Hounslow</b>	Policy 25 Affordable, Flexible and Managed Workspace					LBH also support the approach to the provision of affordable workspace in Policy 25.	
415	Peter Thompson, <b>National Physical Laboratory (NPL)</b>	Policy 25 Affordable, Flexible and Managed Workspace	Yes	Yes	Yes		<b>Policy 25. Affordable, flexible and managed workspace</b> is an area where NPL can provide input for local benefit, using our international science community relationships. "Support small scale scientific, innovation and research space with a provision of incubator units and laboratories. While the borough accommodates a number of large universities and research institutions, there is no complementary local offer for smaller firms operating in the same sector. The creation of innovation hubs and R&D incubators can offer opportunities for co-location". This could provide more opportunity for local collaboration and the possibility of co-location of facilities which would benefit all parties. NPL believes strongly in supporting entrepreneurs, start-ups and SMEs, our current measurement for Business programme is testament to this. We would welcome the opportunity to discuss how the capabilities of our site in Teddington could support scientific innovation more widely in the area and would be keen to offer our expertise to discuss the council's existing plans and strategies to attract investment into the area.	
-	James Sheppard (CBRE), <b>LGC LTD</b>						[See comment 401 in relation to Policy 25 and the LGC site]	
-							<b>Policy 26 Visitor Economy</b>	
416	Tom Clarke, <b>Theatres Trust</b>	Policy 26 Visitor Economy A.5	Yes	Yes	Yes		This policy further supplements Cultural Quarters, and Theatres Trust is supportive of the Plan's approach to supporting its cultural facilities.	
417	Olivia Russell (CBRE), <b>Rugby Football Union (RFU)</b>	Policy 26 Visitor Economy	Yes	No	Yes	Justified; Consistent with national policy	<b>Policy 26 (Visitor Economy)</b> As drafted in the Regulation 18 Local Plan, Policy 26 did not reference Twickenham Stadium or its significant role in LBRuT's visitor economy, as a nationally (and indeed internationally) significant sporting venue, and its secondary but essential revenue-generating use as an entertainment venue. The emerging policy does not appear to recognize the critical role Twickenham Stadium plays in adding to the viability and vitality of Twickenham town centre either, and should be addressed. In Regulation 18 Local Plan representations, the RFU requested that the Stadium is added to the existing attractions that the Borough will support, promote and enhance. We suggested that Part A of this Policy (p.220) is updated as follows (amendments in red/strikethrough). <i>A. The Council will support the sustainable growth of the visitor economy for the benefit of the local area by:</i> <i>1. supporting proposals which promote and enhance the borough's existing tourist attractions, including the unique, historic and cultural assets that are connected via the River Thames, such as The Royal Botanic Gardens, Kew, Ham House and Hampton Court Palace;</i> <i>2. proposals that lead to increased visitors and tourists need to be of an appropriate scale for the size of the centre and will be assessed against the transport policies of this Plan;</i> <i>3. requiring accommodation and facilities to be accessible to all; either 10% of hotel bedrooms should be wheelchair accessible or 15% of new bedrooms to be accessible rooms as set out in London Plan Policy E10;</i> <i>4. enhancing the environment in areas leading to, within and around visitor destinations where appropriate;</i> <i>5. supporting the Cultural Quarters in Richmond and Twickenham and other existing clusters of cultural facilities and creative industries, particularly in town centres, and where ancillary facilities are proposed that are open for public use (such as restaurants, gyms and conference facilities);</i> <i>6. supporting appropriate development at Twickenham Stadium which complements the use of the site as an internationally significant sports and entertainment venue.</i> Within the Council's Statement of Consultation (June 2023), in response, the importance of Twickenham Stadium to the Borough was accepted and recognised by the Council. It was confirmed the list is not exhaustive and would encompass	

							Twickenham Stadium. This is acknowledged and the clarification is welcomed, however, the RFU maintain that given the scale and international significance of the Stadium, a specific reference to it should be included within the policy text.	
418	Katherine Drew, <b>The Royal Parks</b>	Policy 26 Visitor Economy					In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again. [See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 851 in relation to reference in the policy, in the context of support by providing the necessary infrastructure]	
-							<b>Policy 27 Telecommunications and Digital Infrastructure (Strategic Policy)</b>	
419	Tim Catchpole, <b>Mortlake with East Sheen Society</b>	Policy 27 Telecommunications and Digital Infrastructure (Strategic Policy)					<b>Theme: Increasing jobs and helping business to grow (Policies 21-27)</b> <b>Policy 27. Telecommunications and digital infrastructure</b> [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments – comment 858 in relation to Policy 27] We note your comment that “The Council’s planning decisions for recent telecommunications masts are all considered to be sound with regards to the officer assessment of visual impact. It would therefore not be reasonable to make the submission of a photomontage a blanket policy requirement.” On the contrary planning applications should be understood not just by the officers but by the general public. Photomontages would considerably help the latter, for whom submitted drawings are usually hard to understand.	
420	Peter Thompson, <b>National Physical Laboratory (NPL)</b>	Policy 27 Telecommunications and Digital Infrastructure (Strategic Policy)	Yes	Yes	Yes		We are also pleased to see a commitment to the digital infrastructure in <b>Policy 27. Telecommunications and digital infrastructure.</b>	
421	Louise Fluker, <b>The Richmond Society</b>	Policy 27 Telecommunications and Digital Infrastructure (Strategic Policy), Paragraph 19.62		No		Effective	Applications for very tall monopoles (15m-25m) are, in the wrong setting, very obtrusive. Verified visuals would assist the local community in interpreting the effect on the surrounding areas	Add "the provision of verified visuals"
-							<b>Protecting what is special and improving our areas (heritage and culture)</b>	
422	Claire Wilmot	Protecting what is special and improving our areas (heritage and culture)					The River and the surrounding area should be protected the borough relies on this area for wildlife, exercise, mental health. Do not let Thames Water destroy it.	
-							<b>Policy 28 Local Character and Design Quality (Strategic Policy)</b>	
423	Tom Wignall (Avison Young), <b>National Gas</b>	Policy 28 Local Character and Design Quality					National Gas Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. <b>About National Gas Transmission</b> National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK’s four gas distribution networks where pressure is reduced for public use. <b>Utilities Design Guidance</b> The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure. National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around underground gas transmission pipelines and other National Gas Transmission assets. [See proposed modification to Policy 28] <b>Further Advice</b> National Gas Transmission is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Gas Transmission assets. [See Appendix 9]	Therefore, to ensure that Design Policy 28 is consistent with national policy we would request the inclusion of a policy strand such as: <i><u>“x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”</u></i>







							<p>If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Gas Transmission wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Gas Transmission on any Development Plan Document (DPD) or site-specific proposals that could affect National Gas Transmission's assets.</p>	
424	Tom Wignall (Avison Young), <b>National Grid Electricity Transmission</b>	Policy 28 Local Character and Design Quality					<p>National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p><b>About National Grid Electricity Transmission</b> National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.</p> <p>National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.</p> <p>National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.</p> <p><b>Utilities Design Guidance</b> The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET.</p> <p>NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets. [See proposed modification to Policy 28]</p> <p><b>Further Advice</b> NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets. [See Appendix 10]</p> <p>If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.</p>	Therefore, to ensure that Design Policy 28 is consistent with national policy we would request the inclusion of a policy strand such as: <i><u>"x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."</u></i>
425	Tim Catchpole, <b>Mortlake with East Sheen Society</b>	Policy 28 Local Character and Design Quality					<p><b>Theme: Protecting what is special and improving our areas (Policies 28-33)</b> <b>Policy 28. Local character and design quality</b> [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments – comment 864 in relation to Policy 28]</p> <p>We commented that the policy about gated communities not being permitted had apparently disappeared but you have pointed us in the right direction, for which apologies and thanks.</p>	
426	Katherine Drew, <b>The Royal Parks</b>	Policy 28 Local Character and Design Quality					<p>In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again. [See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 861 in relation to the importance and protection of the Parks]</p>	
427	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), <b>St George plc and Marks and Spencer</b>	Policy 28 Local Character and Design Quality	No	N	N	Positively Prepared; Justified; Effective; Consistent with national policy	<p>Furthermore, we continue to have concerns regarding the soundness of Policies 10, 12, 13, 17, 18, 28, 38, and 45. These concerns are as set out in our representations made at the Regulation 18 stage (which have not been fully addressed in the Regulation 19 draft). We have therefore 're-submitted' these comments which should be treated as forming part of our representations to the Regulation 19 draft (enclosed at Appendix A). [See Appendix 6, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 867 in relation to: part B. Recommend amendment to refer to 'where appropriate' enhances the local environment and character .]</p>	
428	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of	Policy 28 Local Character and Design Quality					<p>[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 865... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments – comment 865 in relation to Policy 28]</p>	


	Richmond Green)							
429	Peter Willan and Paul Velluet, <b>Old Deer Park Working Group</b>	Policy 28 Local Character and Design Quality					[See comment 21] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: 866... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 866 in relation to Policy 28]	
							<b>Policy 29 Designated Heritage Assets</b>	
430	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), <b>St George plc and Marks and Spencer</b>	Policy 29 Designated Heritage Assets	No	N o	N o	Positively Prepared; Justified; Effective; Consistent with national policy	As part of our Regulation 18 representations, we provided detailed commentary and proposed revised wording for Policy 29 – Designated Heritage Assets. For ease, we append such representations to this report at Appendix A [See Appendix 6], and do not repeat our previous commentary here, so to save on repetition. We note here that Policy 29 has been revised since the Pre-Publication (Regulation 18) version of the Draft Local Plan, with the Council removing overly restrictive policies. We do, however, reiterate our concerns regarding Policy 29, in that it does not follow the national planning policy requirement that notes that where a proposal causes harm to a designated heritage asset, such harm should require clear and convincing justification and be outweighed by public benefits (Paragraphs 201 & 202 – NPPF 2021). As currently drafted, Policy 29 is not compliant with national planning policy.	
431	Smruti Patel (Avison Young), <b>Avanton Richmond Developments LTD</b>	Policy 29 Designated Heritage Assets		N o		Justified; Consistent with national policy	We consider the drafting of Policy 29 to be unsound. Paragraphs 201 & 202 of the NPPF (2021) state that where a proposed development will cause harm to a designated heritage asset (whether that be substantial or less-than-substantial), clear and convincing justification is required in order to demonstrate that such harm is outweighed by the public benefits of a development proposal. As currently drafted, Policy 28 is not compliant with national planning policy. Parts A.4, A.6 A.8 and A.9 are considered too specific, particularly in reference to the requirement to retain and preserve original structures, layouts and architectural features. There is no requirement to, in national planning policy or the London Plan 2021, to reinstate historic features, not least in cases of buildings of multiple periods, as it may not be appropriate to reinstate features of a particular phase of a building's history.	
432	Mark Jopling, <b>Udney Park Playing Fields Trust</b>	Policy 29 Designated Heritage Assets Conservation Areas (Udney Park Draft Conservation Area Appraisal)					<b>Udney Park Draft Conservation Area Appraisal</b> In response to a public consultation on Conservation Areas for Teddington and Hampton Wick in summer 2022, the Trust prepared a Draft Conservation Area Appraisal for all of Udney Park, working with a leading Heritage architect and the London Gardens Trust. In January 2023 LBRUT declined to review this draft Appraisal due to resource priorities. In light of the continuing deterioration of amenities at Udney Park, the Trust urges the Council to review the draft Conservation Area Appraisal before the Local Plan Inspection.	
-	Richard <b>Mundy</b>	Paragraph 20.36	Yes	N o	Yes	Effective	[See comment 316 in relation to decarbonisation of existing stock including in Conservation Areas]	
-							<b>Policy 30 Non-designated Heritage Assets</b>	
433	Mark Jopling, <b>Udney Park Playing Fields Trust</b>	Policy 30 Non-designated Heritage Assets (Pavilion Heritage)					<b>Pavilion Heritage</b> The Trust welcomes the recognition of the Udney Park Pavilion as a registered War Memorial and Building of Townscape Merit since the last Local Plan. The War Memorial Pavilion passed the centenary of its opening in November 2022. The current owners have allowed a physical deterioration in the condition of the Pavilion due to anti-social behaviour and the Trust urges the Council to use statutory powers of Enforcement to protect locally-listed Heritage buildings.	
434	Martha Bailey, <b>London Historic Parks and Gardens Trust</b>	Policy 30 Non-designated Heritage Assets					A. The Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, <b>locally listed historic parks and gardens</b> and other local historic features. B. There will be a presumption against the demolition of Buildings of Townscape Merit.	There is an easily accessible table of locally listed buildings available online however it is not clear where 'locally listed historic parks and gardens' have been collated. Please provide a clear signpost. Please note that LPG's inventory of historic open spaces in the borough of Richmond (see appendix on attached cover letter) [See comment 27] may provide the basis for a local list if none has been compiled to date.
435	Smruti Patel (Avison Young), <b>Avanton Richmond Developments LTD</b>	Policy 30 Non-designated Heritage Assets		N o		Consistent with national policy	As currently drafted, Policy 30 is not consistent with national policy set out in NPPF (2021), which requires the effect of an application on the significance of a non-designated heritage asset to be taken into account in determining applications. There is no requirement in national legislation or policy to preserve or enhance the significance of non-designated heritage assets.	
436	Mark Knibbs (Avison Young with input from Montagu	Policy 30 Non-Designated Heritage Assets	No	N o	N o	Positively Prepared; Justified; Effective;	We continue to consider Draft Policy 30: Non-Designated Heritage Assets unsound, as it remains inconsistent with national planning policy set out in the NPPF (2021), which requires the effect of an application on the significance of a non-designated heritage asset to be taken into account in determining applications. There is no requirement in national legislation or policy to preserve or enhance the significance of non-designated heritage assets.	



	Evans and Energist), St George plc and Marks and Spencer					Consistent with national policy		
-							<b>Policy 31 Views and Vistas</b>	
437	Peter Willan and Paul Velluet, <b>Old Deer Park Working Group</b>	Policy 31 Views and Vistas, Draft Local Views SPD					We responded in September 2022 to the Council's consultation on a draft SPD Local Views. [See previous comments in the <a href="#">Draft Local Views SPD responses schedule</a> ] Our understanding from Joanne Capper in her aforementioned email of 20 July 2023 is that it is the Local Plan which has to formally designate a 'new' view (i.e the name of that view and it being shown on the Policies Map), so the Council has put the draft Local Views SPD 'on hold' until they know what the Inspector will recommend as part of the Local Plan process (they will confirm the designation of new views). Once that is clear, the Council can pick up the details again in the Local Views SPD (i.e. take it to adoption, or a further consultation if it is considered necessary, which will include revisiting/producing the detailed proformas for each view). We wish to include as part of our response to the draft Local Plan the proposed views and related issues in our 2022 response on the draft SPD and accordingly include our response to the draft SPD on Local Views as Annex 3 [see Appendix 11].	
438	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	Policy 31 Views and Vistas, Draft Local Views SPD					The Friends of Richmond Green (FoRG) responded in September 2022 to the Council's consultation on a draft SPD Local Views. [See previous comments in the <a href="#">Draft Local Views SPD responses schedule</a> ] Our understanding from Joanne Capper in her aforementioned email of 20 July 2023 is that it is the Local Plan which has to formally designate a 'new' view (i.e the name of that view and it being shown on the Policies Map), so the Council has put the draft Local Views SPD 'on hold' until they know what the Inspector will recommend as part of the Local Plan process (they will confirm the designation of new views). Once that is clear, the Council can pick up the details again in the Local Views SPD (i.e. take it to adoption, or a further consultation if it is considered necessary, which will include revisiting/producing the detailed proformas for each view). We wish to include as part of our response to the draft Local Plan the proposed views and related issues in FoRG's 2022 response on the draft SPD and accordingly include the FoRG's response to the draft SPD on Local Views as Annex 3 [see Appendix 12]. FoRG have given us permission to use their submission.	
439	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), <b>St George plc and Marks and Spencer</b>	Policy 31 Views and Vistas	No	N	N	Positively Prepared; Justified; Effective; Consistent with national policy	We continue to find Policy 31 unsound and too prescribed. Elements of the draft policy do not conform with the London Plan (2021), which states that development should not harm, and should seek to make a positive contribution to, the characteristics and compositions of Strategic Views and their landmark elements. We recommend the policy is redrafted in order to be brought in line with strategic planning policies of the London Plan (2021). We also note here that reference is now made to the Local Views SPD, which identifies views/ vistas designated as part of the adoption of the Local Plan. We raise concerns here that the Local Views SPD fails to provide references to design policies and guidance set out in national policy and guidance, as well as the framework for the identification of views across the capital. It also does not provide development management guidance, which will help ensure their visual interest (including any contribution made by heritage assets to that visual interest). We continue to urge the Council to include this level of detail within the supporting evidence base.	
440	Gary Backler, <b>Friends of the River Crane Environment (FORCE)</b>	Policy 31 Views and Vistas	Yes	No	Yes	Positively Prepared	Please find attached the response of Friends of the River Crane Environment (FORCE) to the Local Plan Publication Consultation. As a community-based charity, FORCE has some 750 members, primarily locally based, and attempts to represent their views on issues in the lower Crane valley, including this consultation. This response was authorised at a routine monthly meeting of FORCE's Trustee board. We would be pleased to discuss this response at any time, should that be useful.  Policy 31: We note with regret that despite our previous consultation response, no parts of the River Crane corridor have been included in the "views and vistas identified on the Policies Map" (pp281-2)	Policy 31: Consistent with our response to the Local Views SPD in September 2022, we would like to see inclusion in the list on pp 281-2 of some or all of the following: views from Craneford West Field, Mereway Nature Reserve and Kneller Gardens, from Crane Park throughout its length between Meadway in the east and the A314 in the west, including the view northwest from the A316 overbridge and the view of the Shot Tower and Crane Park Island Nature Reserve, and the view from Little Park towards Pevensey. [See previous comments in the <a href="#">Draft Local Views SPD responses schedule</a> ]
441	Katherine Drew, <b>The Royal Parks</b>	Policy 31 Views and Vistas					RE: London Borough of Richmond upon Thames – Local Plan Publication (Regulation 19) Consultation 9 June to 24 July 2023 Thank you for consulting The Royal Parks (TRP) on the above proposals. Bushy Park is owned by the Crown, but TRP is responsible for its management on behalf of the Crown. The Park is Grade 1 listed on Historic England's Register of Historic Parks and Gardens, is a National Nature Reserve (NNR), a Site of Special Scientific Interest (SSSI), Conservation Area (CA) and a Special Area of Conservation (SAC). One of TRP's charitable objects is to protect and conserve the land under its management. After viewing all the details submitted, The Royal Parks would like to make the following comments on the diagrams: - Sawyer's Hill E3.3 – the view semi-circle should be twisted anticlockwise so indicates correct directions (N, E and SE mentioned in text – current diagram twisted too far to the south) - White Lodge to Pen Ponds E3.5 – the point location needs to move to the south more in line with the south edge of White Lodge rather than the centre TRP welcome in the document the inclusion of the following views: Sawyer's Hill E3.3	



						<p><b>Richmond Park</b>  <b>Sandy's Hill</b>  <b>(E3.3)</b></p> <p><b>Project</b>  <b>Prospect</b></p> <p><b>Description of View</b>    The view from Sandy's Hill is a wide, open landscape of rolling hills and fields, with a few scattered trees and buildings in the distance. The sky is blue with some light clouds.</p>  <p><b>View E3.3</b></p>  <p><b>White Lodge to Pen Ponds E3.5</b></p> <p><b>Richmond Park</b>  <b>White Lodge to Pen Ponds</b>  <b>(E3.5)</b></p> <p><b>Project</b>  <b>Prospect</b></p> <p><b>Description of View</b>    The view from White Lodge to Pen Ponds is a wide, open landscape of rolling hills and fields, with a few scattered trees and buildings in the distance. The sky is blue with some light clouds.</p>  <p><b>View E3.5</b></p>  <p><b>Pantle Bridge A4.1</b>  <b>Pantle Bridge:</b></p>  <p><b>Dean Road footbridge A2.1</b>  <b>Dean Road footbridge:</b></p>  <p><b>Hampton Court Gate A5.8</b></p>	
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					 <p>Hampton Court Gate:</p> <p>Lime Avenue A5.9</p> <p>Chestnut Avenue, northern leg A5.10</p> <p>Water Gardens A5.11</p>	
442	Vivien Harris, <b>Friends of Richmond Green</b>	Policy 31 Views and Vistas, Draft Local Views SPD			<p>The Friends of Richmond Green is a long established amenity group covering around 350 households around and in the vicinity of Richmond Green and Little Green. We aim to preserve the special qualities, character and setting of the historic Richmond Green. The Green is a wonderful setting with many historic views and vistas and is a major attraction for patrons visiting the town, its shops and offices and is much appreciated by the many residents in the vicinity of the Richmond Green as well as residents in the town's wider reaches.</p> <p><b>BASIS OF RESPONSE</b></p> <p>Friends of Richmond Green has examined the schedule of extracts from the Council's Consultation Statement of June 2023 detailing responses from the Friends of Richmond Green (response number 42), the Prospect of Richmond and the Old Deer Park Working Group in January 2022 to the Pre-Publication draft Local Plan and the Council's responses.</p>	

						<p>The schedule was prepared by the Council and emailed to Mr Willan, representing the three respondents, on 20 July 2023.</p> <p>The Friends of Richmond Green fully endorse and support the response by Prospect of Richmond to the Publication draft Local Plan (Regulation 19) consultation. We have read the response and have been engaged with the Prospect of Richmond on the content. For identification, accompanying this Friends of Richmond Green response is a copy of the Prospect of Richmond response dated 31 July 2023 (see Annex A) [see Appendix 13]. We would like to be included in correspondence from the Council on the Local Plan. Also, we would like to have the opportunity along with the Prospect of Richmond of resolving with the Council or Planning Inspector outstanding issues detailed in the Prospect of Richmond response.</p> <p>The Friends of Richmond Green responded in September 2022 to the Council's consultation on a draft SPD Local Views. Our understanding from Joanne Capper in her aforementioned email of 20 July 2023 is that it is the Local Plan which has to formally designate a 'new' view (i.e the name of that view and it being shown on the Policies Map), so the Council has put the draft Local Views SPD 'on hold' until they know what the Inspector will recommend as part of the Local Plan process (they will confirm the designation of new views). Once that is clear, the Council can pick up the details again in the Local Views SPD (i.e. take it to adoption, or a further consultation if it is considered necessary, which will include revisiting/producing the detailed proformas for each view). We have given permission to the Prospect of Richmond to include as part of its response to the draft Local Plan, the proposed views and related issues in the Friends of Richmond's 2022 response on the draft SPD. Notwithstanding inclusion of the Friends of Richmond Green's response on the draft SPD in the Prospect of Richmond's response, The Friends of Richmond Green wishes to submit here as Annex B [see Appendix 13] its response on the draft SPD for its own account when considering the draft Local Plan. [See previous comments in the <a href="#">Draft Local Views SPD responses schedule</a>]</p>	
443	Tim Catchpole, Mortlake with East Sheen Society	Policy 31 Views and vistas				<p><b>Policy 31. Views and vistas</b> [See previous comments in the <a href="#">Draft Local Views SPD responses schedule</a>]</p> <p>We are disappointed to see that Map 20.1 still shows the Borough floating in a vacuum. It must include the edges of neighbouring boroughs. Some views in our Borough extend to landmarks in neighbouring boroughs and vice-versa.</p>	
444	Henry Brown (The Planning Lab), Royal Botanic Gardens Kew	Policy 31 Views and vistas	Yes	No	Yes	<p>Effective; Consistent with national policy</p> <p>We would also like to take this opportunity to request some clarification on the process for progressing the related <b>Local Views Supplementary Planning Document</b>. This is a key document that has the potential to have a major impact on Kew Gardens. As such, RBGK provided detailed comments in response to the consultation on the draft SPD in Summer 2022. We note that LBRuT has recently published all the responses received to that consultation [See previous comments in the <a href="#">Draft Local Views SPD responses schedule</a>] and indicates on its website that the next step once it has considered these will be to adopt a final version of the document. RBGK would like some reassurance that a future version of the SPD will be made available for review prior to its adoption, given its importance and also in light of the nature of some of our responses to the last consultation which identified additional detail that would be required for the document to provide the right level of protection for the identified views.</p> <p><u>Policy 31: Views and Vistas</u></p> <p>RBGK continues to seek clarification on how the identified views have been assessed as this information is not included in this version of the Plan. Although an evidence base is referred to - including work undertaken by Arup to inform the SPD – the methodology relating to views analysis does not appear to form part of Arup's Urban Design Study (2023). We are concerned that the lack of detail about the views included in the Plan (and the supporting Urban Design Study and Local Views SPD documents), for example in terms of a description of the visual amenity or development management guidance, might lead to inappropriate development that negatively impacts the Kew Gardens WHS. RBGK would also like to understand the next steps for the draft Local Views SPD and how LBRuT intends to respond to the comments received during the most recent consultation in Summer 2022. As this SPD is so closely related to this Plan policy, it is important that this next stage of work is closely coordinated with any further modifications to the Local Plan and that RBGK has the opportunity to input and comment further.</p>	See Section 6, above
-						<p><b>Policy 32 Royal Botanic Gardens, Kew World Heritage Site</b></p>	
445	Jonathan Blathwayt, GLA on behalf of Mayor of London	Heritage				<p>Policy 32 recognises the Royal Botanical Gardens Kew as a World Heritage Site (WHS), in line with HC2 LP2021. As set out in the Mayor's response to the Regulation 18 consultation, the wording of Policy 32 should state that all developments with the potential to impact on the WHS or its setting should be required to be supported by Heritage Impact Assessment. This should be moved from para 20.52 into the main body of the Policy.</p>	
446	Tim Brennan, Historic England	Policy 32 Royal Botanic Gardens, Kew World Heritage Site				<p>Policy 32 – Royal Botanic Gardens, Kew World Heritage Site</p> <p>We fully support the objective of the policy to protect, conserve, promote and enhance the World Heritage Site. We would however recommend that the reference to the Outstanding Universal Value (OUV) should be within the main body of clause A to make clear that this is the central purpose of the policy in question – ie conserving its heritage significance. This would align with policy HC2 which requires development plans to conserve and actively protect the OUV of world heritage sites.</p> <p>We would also reiterate our previous comment [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 897] that the policy should make clear that development proposals that would have an impact on the WHS will require a Heritage Impact Assessment upon</p>	


							application – further details can be found at <a href="#">World Heritage Centre - Guidance and Toolkit for Impact Assessments in a World Heritage Context 2022 (unesco.org)</a> .	
447	Duncan McKane, <b>London Borough of Hounslow</b>	Policy 32 Royal Botanic Gardens, Kew World Heritage Site					<p><b>Heritage and Conservation</b></p> <p>LBH, LBRuT and Royal Botanic Gardens, Kew have engaged extensively throughout the development of LBH's Great West Corridor development plan document in relation to cross-boundary conservation and heritage matters. To date this has looked specifically at the impact of tall buildings in the Brentford area upon the UNESCO World Heritage Site at Royal Botanic Gardens, Kew. This engagement led to the production of a SoCG between the three parties in December 2020.</p> <p>As LBH progress with the consolidated Local Plan Review, we would welcome further engagement on these matters with LBRuT and Royal Botanic Gardens, Kew to ensure that we have fully considered all potential cross boundary impacts as we progress with our Local Plan review.</p>	
448	Henry Brown (The Planning Lab), <b>Royal Botanic Gardens Kew</b>	Policy 32 Royal Botanic Gardens, Kew World Heritage Site	Yes	No	Yes	Effective; Consistent with national policy	<p><b>Policy 32: Royal Botanic Gardens, Kew World Heritage Site</b> [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 898 in relation to Policy 32]</p> <p>RBGK requested in its response to the Regulation 18 consultation that some amendments were made to the text of this Policy, which aims to protect, conserve, promote and enhance the RBG WHS. To achieve these aims, it is imperative that RBGK is able to adapt the site into the future to support the sustainable function and operation of the Gardens. It must do this while continuing to provide a world-renowned, leading visitor attraction and working scientific and research institution. At present, RBGK does not believe that the wording of the policy allows for sufficient flexibility to carefully balance the needs of conservation, access, the interests of our visitors and the local community, and sustainable economic use and operation of the site, in order to effectively manage the WHS for the future in the consideration of future development proposals.</p> <p>For this reason, RBGK reiterates its request that the following additional point is added under Part A of this policy, as follows:</p> <p>'4. Ensuring the long-term sustainability of the World Heritage Site will require a careful balancing between the needs of conservation, access, biodiversity, the climate emergency, income and the public benefits of any development on the site.'</p> <p>Another important element of the functioning of Kew Gardens as an internationally significant visitor attraction is the regular temporary exhibitions and installations it runs throughout the year, for which planning permissions are often required. These can be key in enhancing the visitor and learning experience for our local and international visitors alike; they also provide a way to draw attention to important issues and key elements of Kew's research, such as halting biodiversity loss. They draw visitors to the Borough, which provide other social and economic benefits.</p> <p>To ensure this necessary activity is appropriately recognised in LBRuT's development management policy, RBGK reiterates its request that the following wording to be added as a fifth point under Part A:</p> <p>'5. Temporary events and exhibitions are recognised as a key part of the offer at the Royal Botanic Gardens, Kew World Heritage Site and, subject to other planning policy considerations within this plan, are supported in principle.'</p>	See Section 6, above.
-							<b>Policy 33 Archaeology – no comments received</b>	
-							<b>Increasing biodiversity and the quality of our green and blue spaces, and greening the borough</b>	
449	Claire Wilmot	Increasing biodiversity and the quality of our green and blue spaces, and greening the borough					Protection of the green spaces in the borough are imperative at risk at present are Udney Park Playing fields and the river	
450	Claire Wilmot	Increasing biodiversity and the quality of our green and blue spaces, and greening the borough					Whilst I support some of the measures in the draft plan, particularly protecting most of the Green Belt and Metropolitan Open Land and designating more areas as SINCs, I feel there is more work to be done before the plan can be adopted.	
451	Jon Rowles	Green infrastructure - All London Green Grid					- Green Grid Area GGa10 River Colne and Crane policies are not reflected fully in the policies in the Richmond Local Plan, and the council should be looking at how it can support the London Plan's ambition to create a new metropolitan scale park (policy 5.162). Several of the site allocations, Harlequins / Kneller Hall / Sainsbury St Clares / Twickenham Stadium / are next to the policy area and should reference them.	
452	Peter Thompson, <b>National</b>	Increasing biodiversity and the	Yes	Yes	Yes		The importance to NPL of <b>Policy 21 Increasing biodiversity and the quality of our green and blue spaces, and greening the borough</b> is demonstrated through our ESG Directorate's work on our direct Environment including the ongoing maintenance of our own green spaces, Bushy House gardens and initiatives such as 'no mow May'. We remain	

	<b>Physical Laboratory (NPL)</b>	quality of our green and blue spaces, and greening the borough					committed to this and hear how important it is to our employees. We would like to hear more about the council plans in this area and how we may contribute further.	
453	Rachel Holmes, <b>Environment Agency</b>	Increasing biodiversity and the quality of our green and blue spaces, and greening the borough					<p><b>2. Biodiversity</b></p> <p>The importance of ecological networks, of linked habitat corridors (both within the Borough and linking to adjacent Boroughs) to allow the movement of species between suitable habitats, and to promote the expansion of biodiversity is defined in the National Planning Policy Framework and the Local Nature Recovery Strategy commitment of the government's 25-year Environment Plan and enacted by the Environment Act 2021.</p> <p>The connectivity of Local Wildlife Sites and other designated sites should not be disrupted through the allocation of sites for development and should aim to promote further connectivity of the ecological blue and green network through habitat creation and improvement. A numerical commitment to biodiversity net gain is required in order to be in line with the Environment Act 2021 and should be realised equally in both terrestrial and aquatic habitats using the Natural England Biodiversity and Rivers Metrics.</p> <p>Development sites should not encroach on any watercourse and we urge a minimum 16m buffer zone to development proposals that contain or are adjacent to the Thames and explore opportunities for river restoration enhancements and biodiversity net gain through planning. The reparation or replacement of existing flood defences and/or creation of setback flood defences, every opportunity for ecological betterment should be a requirement rather than an aspiration of new development. Ecological terracing to provide fish refuge and wading bird forage should be at the forefront of considerations. Improved fish/eel refuge should again be prioritised with new pontoons or structures within the watercourse. We would wish to see a policy commitment to actively pursue these aims.</p> <p>Where the watercourse is toe-boarded or engineered, policies should consider opportunities for removal and restoration to a more natural state.</p> <p>With reference to Paragraph 185 of the NPPF it which states that planning policies and decisions should 'limit the impact of light pollution from artificial light on ... dark landscapes and nature conservation.' We would urge appropriate lighting design in line with best practice guidance set out by the Bat Conservation Trust.</p> <p>As an informative point, policies should take into consideration the use of SuDS and Natural Flood Management measures for flow attenuation, filtration, and water conservation.</p> <p>We have provided comments on several policy units relating to biodiversity. Whilst the following recommendations for each policy do not affect the soundness of the plan, they could strengthen each respective policy and the overall the Local Plan.</p>	
-	Michael Atkins, <b>Port of London Authority (PLA)</b>	Local Plan	Yes	Yes	Yes		[See comment 5 in relation to proposed amendments to Policies 39, 40 and 41]	
-							<b>Policy 34 Green and Blue Infrastructure (Strategic Policy)</b>	
454	Rachel Holmes, <b>Environment Agency</b>	Policy 34 Green and Blue Infrastructure (Strategic Policy)					We are pleased to see that our comments from our Regulation 18 response have been incorporated into this policy.	
455	Mark Jopling, <b>Udney Park Playing Fields Trust</b>	Policy 34 Green and Blue Infrastructure (Strategic Policy)					<p><b>Green and Blue Infrastructure</b></p> <p>At the 2020 Public Inquiry the Council Biodiversity Officer recognised the importance of Udney Park to the local ecology network. The Trust is supportive of the Council maintaining the importance of Udney Park in Nature Conservation and the potential of Udney Park to increase its role in the provision of green space for public amenity.</p>	
456	Martha Bailey, <b>London Historic Parks and Gardens Trust</b>	Policy 34 Green and Blue Infrastructure (Strategic Policy)					<p>A. Green and blue infrastructure is a network of multi-functional green spaces and green features, green space stepping-stone sites as well as rivers and other watercourses, ponds, floodplains and wetlands, which provides multiple benefits for people, nature and the economy, and which plays a significant role in both mitigating and adapting to climate change.</p> <p>B. To ensure all development proposals protect and appropriately enhance and restore green infrastructure, the following will be taken into account when assessing development proposals:</p> <ol style="list-style-type: none"> <li>1. Protect and enhance the borough's blue and green infrastructure networks, in particular, but not exclusively, the sites designated as Green Belt, Metropolitan Open Land, Local Green Space, Other Open Land of Townscape Importance, other open spaces as well as areas designated for their biodiversity and nature conservation value.</li> <li>2. Protect and seek improvements to walking and cycling routes to and through the green infrastructure network, such as green spaces, and where opportunities arise create such routes, thereby promoting healthy lifestyles and active travel.</li> </ol>	Within point B. please provide an additional point - 'Seek opportunities to create new, green open space.'



						<p>3. Enhance the existing blue and green infrastructure network, including open spaces and green corridors, providing habitats for biodiversity to flourish and expand.</p> <p>4. Protect and enhance biodiversity within the green and blue infrastructure networks, particularly on sites designated for nature conservation interest, but also recognise the contribution that non-designated sites offer to increase biodiversity in the borough.</p> <p>5. Increase the provision of green and blue infrastructure in and around development sites through urban greening and other green and blue infrastructure features, ensuring they complement the surroundings and link into existing networks.</p> <p>6. Expect development to incorporate and maintain appropriate elements of green infrastructure which make a positive contribution to the wider network of open spaces.</p> <p>7. Enhance accessibility to open spaces as well as to the blue infrastructure network, particularly to the borough's rivers and their banks, for recreational use, while ensuring that the biodiversity value is protected and enhanced in a measurable way.</p> <p>8. Improve opportunities for local residents and visitors to experience nature and provide educational opportunities, both formal and informal, within the development, to allow the public to embrace their local environment and develop potential stewardship behaviours.</p> <p>9. Make provision for the long-term sustainable maintenance and management of open space and green and blue infrastructure features on site, including supporting community involvement in stewardship of green and blue infrastructure networks, and ensuring there is space for growing food, including pollination and wildlife-friendly gardening.</p>	
457	Katherine Drew, <b>The Royal Parks</b>	Policy 34 Green and Blue Infrastructure (Strategic Policy) (– comments specific to biodiversity and the Royal Parks' Environmental Designations)				<p>In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again.</p> <p>[See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 909 in relation to the impact on green infrastructure]</p>	
-						<b>Policy 35 Green Belt, Metropolitan Open Land and Local Green Space</b>	
458	Mark Jopling, <b>Udney Park Playing Fields Trust</b>	Policy 35 - Local Green Space (LGS), Paragraph 21.8				<p><b>Local Green Space (LGS)</b></p> <p>The Trust welcomes the introduction of a Local Green Space policy to the Local Plan in 21.18, and that Udney Park maintains the status of Local Green Space awarded since the last Local Plan after a site-specific consultation.</p>	
459	Solomon Green	1938 Green Belt				Finally, a private gripe. The fact that Fulwell is 1938 Green Belt land is not mentioned even in a footnote.	
460	John Sadler, <b>CPRE London</b>	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space		No	Positively Prepared; Justified; Effective	<p>CPRE London is a membership-based charity with 2500 members across London, concerned with the preservation and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners.</p> <p>Thank you for the opportunity to comment on this important consultation. We are delighted to see the commitment to protecting the borough's Green Belt and maintaining its current boundaries <sup>1</sup>. The ambitious commitments to combat climate change are laudable<sup>2</sup> and we also support the proposed designation of six new sites as Local Green Space.<sup>3</sup> However, we do have the following concerns and suggestions which we would like the Council to consider before finalising the new Local Plan [See other comments]</p> <p><sup>1</sup> <a href="https://www.richmond.gov.uk/media/fomccpcf/publication_local_plan_low_resolution.pdf">https://www.richmond.gov.uk/media/fomccpcf/publication_local_plan_low_resolution.pdf</a> page 296 section 21.14</p> <p><sup>2</sup> Ibid page 182-213</p> <p><sup>3</sup> Ibid page 296-7 section 21.18</p>	
461	John Sadler, <b>CPRE London</b>	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space		No	Justified; Effective; Consistent with national policy	<ul style="list-style-type: none"> <li>The wording of this policy is not compliant with London Plan or NPPF. It suggests MOL has policy goals and therefore leaves MOL in the borough open to threat from development.</li> <li>21.31 seeks to improve the provision of public open space. We therefore suggest that the area of land at Heathfield Recreation Ground, which was proposed for a site for a school should be added back in and given protected status.</li> <li>The matrix of land that includes David Lloyd, Fulwell Golf Course, Twickenham Golf Course and Squires should be designated as planning Green Belt as it currently has Green Belt (London and Home Counties) Act 1938 designation but only the golf courses are designated as MOL.</li> <li>A clear policy should be introduced to turn streets into parks in areas of deficiency. More needs to be done to turn 'grey space' (roads and space given to parking) to green space or community open space.</li> </ul>	

462	David Wilson, <b>Thames Water</b>	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space		No		Consistent with national policy	<p>Hampton WTW is located in the Green Belt [see Appendix 2 for Hampton WTW Location Plan] and given that it is one of the largest operational WTW and there will be a requirement for upgrades to support growth it is considered that the opportunity should be taken to remove the site from the Green Belt as part of the Green Belt Review to help facilitate development which will be necessary to support growth within the Borough and surrounding area.</p> <p>Hampton WTW was previously identified as an existing Major Developed site in the Green Belt in a previous adopted development plan in accordance with the former Planning policy Guidance Note 2 (PPG2) on Green Belts. However, PPG2 was removed with the publication of the NPPF which does not include provision for the designation of Major Developed Sites in the Green Belt. The Council did not therefore agree to designate Hampton WTW as an existing Major Developed Site in the current Local Plan in line with the NPPF.</p> <p>The operational Hampton WTW occupies 74.3 hectares (183.6 acres), is Thames Water's second largest works and is of strategic importance for London's water supply. It will be inevitable that further upgrades will be required over the plan period to increase capacity to meet growth being proposed in the London Plan and Local Plans or meet new treatment standards.</p> <p>Given that the WTW is essential infrastructure it is considered that there are exceptional circumstances to remove the Hampton WTW from Green Belt designation in accordance with Policy G2 of the London Plan 2021. Essential upgrades to the WTW may be necessary to support growth and deliver environmental improvements. In this context development of the site will be essential to support growth and deliver sustainable development in line with the development plan strategy. The site is not currently open and incorporates significant areas of concrete/brick/metal tanks, plant, machinery and buildings and as such it would not be necessary for the site to remain open. There are a number of water bodies on the site, but these are man made filter beds and reservoirs which could not be maintained as such in perpetuity if they were to become redundant. As such, the designation of the WTW site as Green Belt goes against the requirements for designation of Green Belt land set out in Paragraph 139 of the NPPF.</p> <p>The aerial photo below illustrates the built up nature of Hampton WTW:</p>  <p>Paragraph 134 of the NPPF states that Green Belt serves five purposes: to check the unrestricted sprawl of large built up areas; prevent neighbouring towns from merging; assist with safeguarding the countryside from encroachment preserve the setting and special character of historic towns and assist in urban regeneration. Given that the WTW site is existing developed site with built development and infrastructure on which further development will be required in the future in order to facilitate sustainable development within the borough and surrounding area, the site is not considered to align with the purposes of the Green Belt set out in Paragraph 134. It is therefore considered that the opportunity should be taken to remove the Hampton WTW from the Green Belt.</p> <p>We disagree with the findings of the Green Belt, MOL, LGS and OOLTI Review undertaken as evidence base for the Local Plan and consider the site does not perform strongly in Green Belt terms. The Green Belt review is unclear as to which settlement sprawl is being referred to as the River Thames separates Molesey and Hampton and this part of Green Belt is not strategic in the whole parcel. The assessment of the entire parcel is flawed as it includes a number of different characters which perform differently against the Green Belt functions. To assume all of the land, including buildings and physical infrastructure is 'high performing' Green Belt is clearly flawed. It is therefore considered that the site should be removed from the Green Belt.</p> <p>[See also comments on omission sites – 85 in relation to Land to West of Stain Hill West Reservoir (suggested modification site should be removed from the Green Belt) and 86 in relation to Hydes Field (suggested modification site should be allocated for infrastructure development)]</p>	Remove Hampton WTW from the Green Belt.
463	David Taylor	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space	No	No			<p><u>Land adjacent to Sunnyside reservoir, Hampton TW16 5PR</u> Land Registry Title Plan attached [See Appendix 14]</p> <ul style="list-style-type: none"> <li>This parcel of land does not meet the NPPF criteria to justify its current designation as Green Belt.</li> <li>This statement is without prejudice to my Judicial Review claim that this land has never been lawfully designated as Green Belt.</li> <li>It is unsound to retain the land within the Green Belt and it should be removed.</li> </ul>	<ul style="list-style-type: none"> <li>The GB designation of this patch of land should be removed from the Local Plan Proposals Map</li> <li>A note should be added to Policy ENV4 that <b><i>'The dog-leg' pocket of land lying between the western embankment of the 'west' Sunnyside reservoir and the eastern extremity of Spelthorne's administrative boundary is not designated as Green Belt'</i></b></li> </ul>
464	Olivia Russell (CBRE), <b>Rugby Football Union (RFU)</b>	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space	Yes	No	Yes	Justified; Consistent with national policy	<p>[summary from representation form:] We consider the continued designation of the eastern strip of MOL parcel no. 36 (Kneller Chase Bridge), which encroaches within Twickenham Stadium, is not justified. The continued designation is not based on a robust and credible evidence base, as it does not respond to conclusions and recommendations within the relevant evidence base document (Open Land Review 2021 and MOL Annex Report 2021).</p> <p>Both the Regulation 18 and Regulation 19 Local Plan include the eastern strip of the parcel, which sits within the Twickenham Stadium site, within the Kneller Chase Bridge MOL (Parcel no. 36).</p>	<p>Associated with the above, we suggest that the text within Draft Policy 35 (p.243) is also updated. We propose that a fourth change to the Policies Map is added to the three already listed in the Regulation 19 Local Plan, to account for an updated boundary of Parcel 36 in line with the evidence base, as below.</p> <p>"Proposed Changes to the Policies Map</p> <p>A. Further to the recommendations in the Green Belt, MOL, LGS and OOLTI Review (2021), the following sites will have their MOL designation removed.</p>

				<p>The Local Plan evidence base documents (Open Land Review 2021 and MOL Annex Report 2021) confirm this area meets none of the MOL policy criteria and it is recommended its status is considered further. We are of the view its continued designation is not justified and that the Council's response to the RFU's Regulation 18 representations on this point within the Statement of Consultation (June 2023) is not satisfactory. Please refer to the letter [as below] accompanying this form for full information and the relevant extract of the MOL Land Review 2021.</p> <p><b>Metropolitan Open Land</b></p> <p>Within the Regulation 18 Local Plan representations, it was highlighted that p.117 of the Metropolitan Open Land (MOL) Review Annex Report (detailed assessment) (2021), which was prepared to support and inform the new Local Plan, states the following in relation to parcel no. 36 (Kneller Chase Bridge):</p> <p><i>"The eastern edge of the parcel, hard standing associated with Twickenham Stadium, meets none of the MOL criteria and it is recommended that its MOL status is considered further".</i></p> <p>An image showing the extent of the MOL parcel, from the Metropolitan Open Land (MOL) Review Annex Report (detailed assessment) is provided as <b>Figure 2</b> below and further relevant extracts are provided within <b>Appendix 1</b> [See Appendix 15].</p>  <p><small>Figure 2 - MOL Parcel 36 (shaded green).</small></p> <p>In the RFU's Regulation 18 Local Plan representations, the purposes for designating MOL, according to London Plan Policy G3 (Metropolitan Open Land), were highlighted. The purposes are as follows:</p> <ol style="list-style-type: none"> <li>1. it contributes to the physical structure of London by being clearly distinguishable from the built-up area;</li> <li>2. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;</li> <li>3. it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value; and</li> <li>4. it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.</li> </ol> <p>Policy G3 states that alterations to MOL boundaries should be undertaken through the Local Plan process, when fully evidenced and justified. In the case of LBRuT, this was done through the MOL Review Annex Report.</p> <p>As highlighted in the Regulation 18 representations, the MOL Review Annex Report evidences and justifies the de-designation of the eastern edge of the parcel, in accordance with London Plan Policy G3, as it meets none of the criteria highlighted above. Photographs showing how this area is used on match days and the general condition of the land are provided as <b>Appendix 2</b> [See Appendix 15].</p> <p>However, in response to the RFU's Regulation 18 representations on this point, the Council's Statement of Consultation (June 2023) states,:</p> <p><i>"The purpose of the MOL assessment was to assess the current value of land parcels against the MOL criteria and to suggest areas that the council should further consider as to their role as MOL within the new Local Plan. This site has been assessed by Arup as part of General Area 36. The Council have further considered the strip of land outlined in the comment, however the balance of planning factors has led to the Council's decision not to remove the land from the MOL designation and to retain the requirements as set out currently within Site Allocation 13 in relation to MOL."</i></p> <p>We query what the planning factors are which balance against this assessment which formed part of the new Local Plan Evidence Base, which clearly confirms this part of the MOL does not warrant its designation, and does not have any public value.</p> <p>Through Regulation 19 representations, we continue to request that, in accordance with London Plan Policy G3, the MOL designation is updated to properly reflect the Review's findings by removing the strip of MOL within the Stadium boundary, as it meets none of the MOL criteria. Associated amendments to the Proposals Map should therefore also be made.</p> <p>We continue to request that the below extract of the Site Allocation (p.75-78) is reworded, to remove the reference to MOL following de-designation through the Local Plan process.</p> <p>Current wording:</p> <p><i>"Part of the site, adjacent to the Duke of Northumberland River, is designated Metropolitan Open Land (MOL). The Open Land Review 2021 found that the MOL strip of land to the east of the river should be improved as it forms part of the valued green corridor at the Duke of Northumberland's River to enhance provision for wildlife and</i></p>	<ol style="list-style-type: none"> <li>1. Carpark for Sainsburys, Uxbridge Road, Hampton (see Site Allocation 5)</li> <li>2. Parcel 48 of the Review: Front Gardens Hampton Court Road (East) - The parcel is a very small linear section comprising front gardens to residential properties along Hampton Court Road.</li> <li>3. Parcel 49 of the Review: Front Gardens Hampton Court Road (West) - The parcel is a very small linear section comprising front gardens to residential properties along Hampton Court Road."</li> <li>4. Eastern edge (hardstanding associated with Twickenham Stadium) within Parcel 36 of the Review: Kneller Chase Bridge – This portion of the parcel which is linear, does not meet any of the MOL criteria."</li> </ol>
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							<p>access. Therefore, any development proposal is required to protect and, where possible, enhance, the Duke of Northumberland River, including access to it, and the associated MOL.”</p> <p>Proposed wording:  <i>“The Open Land Review 2021 found that the strip of land to the east of the Duke of Northumberland River should be improved as it forms part of the valued green corridor to enhance provision for wildlife and access. Therefore, any development proposal is required to protect and, where possible, enhance, the Duke of Northumberland River, including access to it.</i></p> <p><i>The Open Land Review 2021 (MOL Annex Report 2021) also found that the hard standing associated with Twickenham Stadium meets none of the MOL criteria, and therefore this land has been removed from the designation. Notwithstanding, any development proposals for Twickenham Stadium would be required to meet Policy 35, and take into account possible impacts on the character, local distinctiveness and openness of the adjacent MOL”.</i></p> <p>Associated with the above, we suggest that the text within Draft Policy 35 (p.243) is updated. We propose that a fourth change to the Policies Map is added (addition in red below).  <i>“Proposed Changes to the Policies Map</i>  <i>A. Further to the recommendations in the Green Belt, MOL, LGS and OOLTI Review (2021), the following sites will have their MOL designation removed.</i></p> <ol style="list-style-type: none"> <li><i>1. Carpark for Sainsburys, Uxbridge Road, Hampton (see Site Allocation 5)</i></li> <li><i>2. Parcel 48 of the Review: Front Gardens Hampton Court Road (East) - The parcel is a very small linear section comprising front gardens to residential properties along Hampton Court Road.</i></li> <li><i>3. Parcel 49 of the Review: Front Gardens Hampton Court Road (West) - The parcel is a very small linear section comprising front gardens to residential properties along Hampton Court Road.”</i></li> <li><i>4. Eastern edge (hardstanding associated with Twickenham Stadium) within Parcel 36 of the Review: Kneller Chase Bridge – This portion of the parcel which is linear, does not meet any of the MOL criteria.</i></li> </ol>	
465	Jonathan Blathwayt, GLA on behalf of Mayor of London	Green Belt and Metropolitan Open Land	Y	e	s	Consistent with national policy	<p>The Mayor is pleased to note the strong protection of the Green Belt in accordance with policies G2 and G3 LP2021 and that you are not proposing any Green Belt for release as set out in the recommendations of the Borough’s Open Land Review 2021.</p> <p>The study also identified that while the majority of MOL within Richmond is performing strongly, there were specific sites that scored weakly against MOL criteria. These included the Sainsburys car park, Hampton site that the borough are proposing in Policy 35 for release and allocate for 100% affordable housing along with restoration and enhancement of the wildlife corridor. In addition, Policy 35 sets out two areas consisting of front gardens for release from MOL designation.</p> <p>Part C of Policy G3 LP2021 sets out that any alterations to the boundary of MOL should only be changed in exceptional circumstances when this is fully evidenced and justified and through the Local Plan process as Richmond is doing. As none of the three sites appear to meet the criteria for inclusion as MOL, the Mayor therefore raises no objection to the proposed release of these sites.</p>	
466	Lucy Hale (Gerald Eve), St Mary's University	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space					<p>Draft Metropolitan Open Land (MOL) Policy Draft Policy 35 ‘Green Belt, Metropolitan Open Land and Local Green Space’ refers to <i>“appropriate uses within the Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, outdoor recreation and sport...”</i>.</p> <p>This policy acknowledges that there are forms of appropriate uses within the MOL. The Teddington Lock campus is largely covered by an MOL designation, which includes the outdoor sports pitches but excludes the two storey education and sports facility building to the east. Outdoor recreation and sport is an appropriate use, however the policy and supporting text is silent on facilities associated, and ancillary, to outdoor recreation and sport. St Mary’s would support further clarity around this point in the policy and supporting text and believe it would be beneficial in respect of a clearer understanding of the parameters for future growth and the enhancement of the facilities on both the Teddington Lock campus and also the main Strawberry Hill campus.</p>	<p>We suggest that the Draft Policy 35 wording is amended as below:  <i>“...appropriate uses within the Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, outdoor recreation and sport (and associated ancillary sport and teaching facilities)...”[amendments in bold].</i></p>
467	Rachel Holmes, Environment Agency	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space					<p>We recommend that the use of greener approaches to communal spaces are employed. We have seen with previous applications in Richmond that development has favoured large areas of impermeable hardstanding with a lack of greening of the river edge. There needs to be a paradigm shift in approach here as the use of greener approaches to communal open space not only address policy 9 and 10 but ensures less carbon impact through construction.</p>	
468	Rosalind Gall (Solve Planning) on behalf of Magda Wilson, Chantry Securities Ltd	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space Draft Policies Map (Metropolitan Open Land	Ye	N	Y	Justified	<p>Please see attached letter [as below] which sets out representations on an error on the Metropolitan Open Land Boundary in relation to our client’s property which we respectfully request is corrected.</p> <p><b>Regulation 19 Plan Consultation</b>  <b>Representations in relation to Metropolitan Open Land Boundary at 141 Uxbridge Road Hampton TW12 1BL</b></p> <p>We write on behalf of the owner of 141 Uxbridge Road, Hampton, TW12 1BL to make representations on the accuracy of the Metropolitan Open Land (MOL) boundary on the Regulation 19 Policies Map where it relates to their property at 141 Uxbridge Road Hampton, TW12 1BL. The relevant extract is shown at Figure 1.</p>	<p>Please see attached letter [previous column] detailing requested change to correct error on Metropolitan Open Land Boundary.</p>

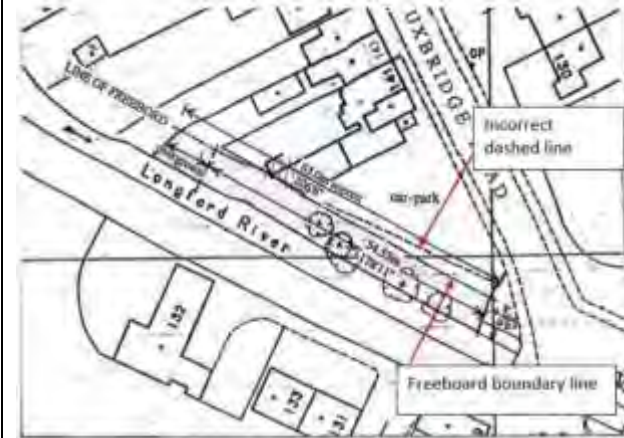


Designation  
Boundary)



**Figure 1: Extract from Regulation 19 Policies map showing MOL boundary**

The strip of land adjoining the Longford River to the south west of our client's property, is subject to a Royal Parks Agency freeboard license which is included at Appendix A [See Appendix 16 for license]. The error in the MOL boundary evidently stems from the wrong line for the freeboard boundary being taken from the map attached to the license. This error has then been repeated. The correct and incorrect lines are annotated on the freeboard map at Figure 2.



**Figure 2: Extract from Freeboard License Map**

The line was evidently drawn in the belief that it was the boundary of the Royal Parks Freeboard area but that in error, the wrong line (of two very similar ones) was chosen. By looking at the length of this side of the MOL boundary, it was clearly unintentional in that as drawn, it's inconsistent, illogical and unjustified. As part of the Local Plan process there is now a simple way to correct this error.

The MOL comprises fields and an adjoining waterway which is part of Royal Parks land. There is no other privately owned or brownfield land included in the MOL, except this tiny sliver of tarmac forming part of our client's private car park.

The Aerial View at Figure 3 shows the approximate line of the Freeboard boundary and the private car park that the Reg 19 MOL boundary cuts across.





**Figure 3 – Google Maps Aerial View**

The historic map extract from 1945 at Figure 4 shows clearly that there has historically been built form up to the boundary with the royal park land and a clearly defined boundary which follows what should be the correct boundary of the MOL.



**Figure 4 – Extract from Middlesex Sheet XXV.NE**

London Plan 2021 Policy G3 (Metropolitan Open Land) sets out the criteria for designating Metropolitan Open Land as set out below:




*Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:*

- 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area*
- 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London*
- 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value*
- 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.*

The site clearly forms part of the built-up area and has done for decades. There is no public access to the site, and it provides no open-air facilities. It contains no landscape features and does not form part of a strategic corridor, node or link in the network of green infrastructure.

It does clearly adjoin a strategic corridor, however the boundary to this is clearly defined by the Royal Park land and does not include the private car parking of the proposal site.

There is compelling evidence therefore that the sliver of our client's land has been included in the draft MOL boundary in error and that there is no logic for its inclusion within it, given the boundary has remained the same for decades, either as built form or as an area of hardstanding used for car parking.

						<p>The line of the MOL boundary has clearly been drawn incorrectly and this has only become apparent as part of application discussions in relation to a new dwelling on our client's private land. That the MOL is well established, or that the error has been repeated is irrelevant.</p> <p>We therefore respectfully request that the Council correct this error before the Local Plan is submitted to the Secretary of State for examination on the basis that it is unjustified.</p>	
469	Thomas Rumble (Woolf Bond Planning), Sulinder Singh	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space, Policies Map (with specific reference to MOL boundary at parcel no. 45)	No	No	Yes	<p>Justified; Effective; Consistent with national policy</p> <p>Site / Representation Context  This representation relates to the definition of the Metropolitan Open Land ("MOL") boundary at 56 Heathside, Whitton, TW4 5NN. It proposes a minor boundary amendment to the MOL that would enable a more justified and effective Local Plan Policies Map.  The below image provides a satellite view of the site (taken from Google Earth).</p>  <p>Further, the below images provide views of the site taken from the Heathside street scene (dated May 2022 and May 2019 respectively).</p>  <p>In addition, the below photo provides a view of the site looking northwards towards Heathside with its mature landscaped boundary (located on the site's far eastern edge) shown on the right hand side of the image.</p>  <p>The below photo provides a view taken from within the adjacent Borough cemetery looking southwards towards the site and illustrates the landscaped nature of the boundary between the garden curtilage serving 56 Heathside and the cemetery.</p>	



Finally, a wider view of the site showing the constructed car port serving the dwelling to the rear located on the opposite side of 56 Heathside is provided below.



Regulation 19 Local Plan Policy Map

As drafted, the proposed Regulation 19 Local Plan Policy map (underpinned by Policy 35 that references and defines the MOL) proposes the below boundary for the MOL (shown in a light green wash) in this location. The proposed boundary represents a continuation of the MOL's boundary in the current Local Plan. An extract taken from the proposed Policies Map is provided below.



The existing and proposed MOL boundary therefore divides the dwelling of 56 Heathside and its rear garden from its side garden and associated access point (to the east of the dwelling and within the MOL). The current MOL boundary is not defined by any landscaping. It is instead 56 Heathside's curtilage boundary on the site's eastern side (adjacent to the cemetery) that defines a physical and recognisable boundary between the publicly accessible large cemetery and the private garden serving 56 Heathside. This arrangement has existed for a number of decades and represents an anomaly in the definition of the MOL boundary by artificially dividing 56 Heathside's garden area.

Planning Policy & Associated Evidence Base Context

The Regulation 19 Local Plan at paragraph 21.2 refers to the Borough being characterised by extensive areas of open land, designated as Green Belt and MOL. It also refers to there being many smaller pieces of open land, including land



that is non designated such as residential gardens. Pages 291 and 292 of the Regulation 19 plan refer to an intention to remove the MOL designation from the front gardens of properties forming Hampton Court Road (East) and (West). Paragraph 21.11 of the Regulation 19 plan then refers to the MOL as playing an important strategic role on a London wide basis:

"MOL is open land or water, either publicly or privately owned, with or without public access. MOL, as shown on the Policies Map, plays an important strategic role as part of the borough and London's multi-functional green infrastructure network and improvements in its overall quality and accessibility are encouraged, including for a range of users. Green corridors, including footpaths and open spaces that they link, are important to London's green infrastructure network, providing opportunities for recreation and biodiversity, and are therefore designated as MOL due to their London-wide strategic importance".

Further, the Council's supporting "Green Belt, MOL, LGS and OOLTI Review" (2021) refers to the London Plan (including Policy G3) and the reasons and purposes behind the designation of the MOL:

"B2.1 London Plan The London Plan (2021) includes Policy G3 on MOL. The policy explicitly states that MOL is 'afforded the same status and level of protection as Green Belt.' The policy states that to designate land as MOL it is necessary to demonstrate that the land meets at least one of the following criteria:

1. It contributes to the physical structure of London by being clearly distinguishable from the built-up area
2. It includes open area facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve the whole, or significant parts, of London
3. It contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value
4. It forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

"Table B2.1 Experience Elsewhere - MOL Reviews" within the document further references a number of examples from other London Boroughs who have reviewed their MOL. The examples of Enfield and Waltham Forest are of particular note hereby through their MOL reviews they identified and addressed past cartographical inconsistencies and made minor boundary adjustments where the existing boundaries did not follow readily recognisable and permanent physical features:

<b>L.B Enfield</b>	Metropolitan Open Land & Green Chain Assessment Open Space Review	Published 2011	A high-level review of MOL and Green Chain associated Open Space (GCOS). It reviewed the MOL boundaries, using GIS to 'tidy up' boundaries that needed adjustment due to land use changes since the previous iteration or past cartographical inconsistencies (due to the previous study being carried out before the formation of G3). It was recommended that the boundaries of sixteen MOL sites should be amended for this reason. Two GCOS sites were recommended to be designated as MOL with a further seven GCOS sites recommended to be designated as MOL with additional boundary changes. One Local Open Space site was recommended to be designated as MOL.
<b>L.B Waltham Forest</b>	Focused Green Belt and Metropolitan Open Land Assessment	Published 2019	This assessment comprised a review of the London Borough of Waltham Forest's Green Belt and Metropolitan Open Land (MOL) in 2014. With regards to MOL, the 2014 study assessed the contribution of the Borough's MOL to the characteristics set out in the London Plan (2011). By drawing out variations in contribution the study provided insight into the Borough's MOL likely to be the most appropriate to accommodate development, if required. It was, however, subsequently established through the findings of other sources of Local Plan evidence that the Borough's growth needs could be sustainably accommodated within the Borough's built-up area outside the MOL. This 2019 report focused on three locations within the Borough's MOL (and Green Belt) identified by the Council and provided a more detailed assessment of the locations, drawing on the updates to London Plan and included an assessment of the 'harm' to the designations should all or part of the land be developed. In addition, the assessment reviewed the alignment of the Borough's existing MOL (and Green Belt) boundaries. Where the existing boundaries do not follow readily recognisable and permanent physical features, recommendations for minor boundary adjustments were made in line with paragraph 134 of the 2019 NPPF.


Table C1.3 of the document proceeds to define tree belts and hedgerows or existing development with strong established and regular boundaries as a regular and durable boundary to the MOL. Such an approach is also consistent with the NPPF that at paragraph 143, part (f) requires that when defining Green Belt boundaries (that are assessed using the same methodology and afforded the same planning policy protection), LPA's should "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent".

Finally, the "MOL Review Annex Report" (2021) assesses each of the MOL designations separately against the London Plan boundary criterion - "Clearly, using physical features that are readily recognisable and likely to be permanent". However, this document and the resulting Policies Map does not propose any amendment to the MOL boundary in this area (considered as parcel no. 45 in the document).

#### Assessment of the Council's Approach

We acknowledge the logic of parcel no. 45 remaining designated MOL in covering the open areas of public or strategic importance forming the playing fields to Turing House school, Heathfield recreation ground and the Borough cemetery. However, a minor boundary amendment to the MOL boundary is proposed as shown using a bold red line on the below annotated plan so to enable the MOL boundary to follow a more readily recognisable and permanent physical feature distinguishing the change in land use that occurs to the southeast of the red line (namely the Borough cemetery) and northwest (residential garden). The proposed MOL boundary illustrated using a bold red line below is defined by mature landscaping (illustrated in the above photos) that does not exist on the MOL's present alignment.

Accordingly, the proposed amendment to the Policies Map is illustrated using a red line on the below annotated Policies Map.

							 <p>The proposed amendment would be consistent with NPPF paragraph 143, part (f) in defining the boundary clearly using a physical feature that is readily recognisable and likely to be permanent. With regard to the criteria detailed in support of London Plan Policy G3, the proposed boundary would be clearly distinguishable from the built up area in separating residential curtilage from the cemetery beyond rather than drawing an arbitrary line part way through 56 Heathside's side garden area (thus passing criterion 1). The MOL would focus upon an open area serving a public recreational and cultural activity only (namely the cemetery use) (thus passing criterion 2). The revised MOL boundary would contain the landscape of metropolitan value (namely the cemetery), without including land that is not of national or metropolitan value (such as garden land) (thus passing criterion 3). Finally, the revised boundary would include only strategic corridors of green infrastructure (forming the cemetery) rather than private garden land (thus passing criterion 4). It is noted that a similar anomaly albeit covering a smaller strip of land (now defined by a backland style residential dwelling and carport) exists on the opposite side of Heathside at No. 65. Logically the same amendment could be made in this location. Accordingly, this is indicated using a bold red line on the above plan as well.</p> <p>Our concern with the plan as drafted (and its supporting evidence base) is that an appropriately fine grained review allowing for minor boundary adjustments to enable the MOL boundary to follow more readily recognisable and permanent physical features has not been undertaken. Instead, it is only the referenced examples of larger areas of MOL that have been considered on a wider or more strategic basis and an amendment is proposed (such as the Hampton Court Road examples). Conversely, the London Boroughs of Enfield and Waltham Forest undertook a fine grained review of the MOL boundaries and logical minor boundary adjustments accordingly. Such an approach should also be undertaken and followed in the LB of Richmond Local Plan Review.</p> <p>In the absence of the proposed amendment to the Policies Map, the plan as drafted fails to form the most appropriate strategy taking into account the reasonable alternative of making appropriate minor MOL boundary adjustments such as the one detailed. It is therefore neither justified or effective when considered against the tests of soundness. Further, the approach is inconsistent with national policy, in particular NPPF paragraph 143 that requires plan makers to define boundaries using a physical feature that is readily recognisable and likely to be permanent. On this basis, the proposed amendment to the Policies Map forms a necessary change having regard to the tests of soundness. Ultimately, this Local Plan Review is to cover the Borough over the next 15 years and appropriate minor boundary amendments to the MOL should be made accordingly through the adoption of this Local Plan Review consistent with NPPF paragraph 140. We would welcome engagement with the Council in advance of submission of the plan to enable this minor adjustment to be made and agreed prior to the examination.</p>	
470	Victoria Chase (WSP), The Boathouse Twickenham Ltd	Publication Local Plan Policies 8, 10, 12, 14, 16, 35 Other: Green Belt, MOL, LGS and OOLTI Review (overarching report) (2021) Metropolitan Open Land (MOL) Review Annex Report	No	N	N	Positively Prepared; Justified; Effective; Consistent with national policy	<p>We submit these representations in response to the Regulation 19 consultation on the Proposed Submission Draft of the Richmond Local Plan on behalf of The Boathouse Twickenham Ltd. In addition, we wish to reserve a place at the relevant Examination hearings and be kept up to date with the timescales for this.</p> <p>These representations focus on:</p> <ol style="list-style-type: none"> <li>1 The accuracy and validity of the Local Plan evidence base, in particular the Green Belt/MOL, LGS and OOLTI Review Report and Annex Report.</li> <li>2 The proposed MOL policies and the retention of The Boathouse within the MOL.</li> <li>3 The impact of proposed MOL policies on the delivery of identified housing targets.</li> </ol> <p>Full details of our representations have been set out below.</p> <p><b>BACKGROUND</b></p> <p>Our client, The Boathouse Twickenham Ltd, is the owner of The Boathouse, Twickenham. There is currently a live planning application on the site for redevelopment of the existing three dwelling residential building for three new family sized residential dwellings (LPA ref. 23/1856/FUL).</p>	



		<p>(detailed assessment) (2021) Parcel Number 31 - Twickenham, Strawberry Hill &amp; St Margarets pp. 101-130</p>			<p>The existing site is currently in use as three C3 residential dwellings. The lawful existing use of three dwellings was recognised in the following applications, LPA ref. 09/2459/FUL and LPA ref. 19/0141/ES19. Therefore, the planning history and current tenancy circumstances recognise all three existing residential dwellings are currently and continue to be in C3 use.</p> <p>The current application (LPA ref. 23/1856/FUL), and a previously withdrawn application (LPA ref. 22/3017/FUL), is for the redevelopment of an existing residential building which is in a state of disrepair and detracts from the character and appearance of the area. The proposal includes the provision of three high quality residential family dwellings. The proposal also includes a landscaping scheme which complements and enhances the surrounding area, including the expansion of the public walkway by up to 1m along the River Thames. Furthermore, a new area of public space is also proposed within the proposal.</p> <p>London Borough of Richmond upon Thames (LBRuT) had an objection to the previous application (LPA ref. 22/3017/FUL) due to the sites location within the Metropolitan Open Land (MOL). However, we consider that this site does not meet the characteristics of MOL and therefore, should be excluded from the MOL. Further details of this have been set out below.</p> <p><b>THE ACCURACY AND VALIDITY OF THE EVIDENCE BASE</b></p> <p>Alongside the Green Belt, MOL, Local Green Space (LGS) and Other Open Land of Townscape Importance (OOLTI) Review Final Report (August 2021), LBRuT also published the MOL Review Annex Report. The published reports set out to assess the existing Green Belt, MOL, LGS and OOLTI land within the LBRuT with the assessment being carried out against four criteria: Clear distinguishment from the built-up area, open area facilities, contains features or landscape of national or metropolitan value and if the area forms part of a strategic corridor, node or a link in the network of green infrastructure. Whilst the Green Belt, MOL, LGS and OOLTI Review Final Report provides an overarching assessment of the MOL space in LBRuT, the annex report provides a further breakdown of the MOL into parcels and further into place.</p> <p>The MOL Review identifies the parcel of land in which The Boathouse is situated within as Number 31, Parcel: River Thames, Area West of Old Deer Park and Place: Twickenham, Strawberry Hill &amp; St Margarets. Criterion 1 states the following about the site and surrounding area:</p> <p><i>“Western half of the parcel (River Thames northern bank): Built development is generally absent from the parcel apart from a minor road and <b>one dwelling</b> within the southern portion. Adjacent residential properties along the western boundary are partially screened by brick walls and varying levels of vegetation, providing localised urban influences.”</i> <i>[our emphasis]</i></p> <p>Furthermore, criterion 2 outlines:</p> <p><i>“No other part of the parcel (besides Eastern half) provides formal recreational or sports open-air facilities.”</i></p> <p>The assessment of the area and The Boathouse within criterion 1 is inaccurate and takes a subjective view of the area to support the retention/no revision of the MOL allocation. The “one dwelling” references The Boathouse which is inaccurate.</p> <p>The Boathouse has been established by LBRuT applications and officer reports (LPA refs. 09/2459/FUL and 19/0141/ES19) as three residential dwellings. Although the site is a single building it comprises of three residential units, attributing to the importance of the site in contributing to the house numbers with LBRuT. Furthermore, the minor road referenced is not specifically identified in the annex report, but the MOL parcel map incorporates Ranelagh Drive. Ranelagh Drive not only provides access to The Boathouse and residential dwellings on adjacent Martineau Drive from the highway but is a road that is heavily in use for travel into and from the area, vehicle parking and providing access to heritage assets such as the Richmond Lock. In short, this road is heavily used by cars, cyclists and pedestrians and should not be seen as “minor road”. The Boathouse does not contribute to the openness or formal and informal recreational or sports open-air facilities as identified in criterion 2. Given the site is already built up and a part of the of built up area of Martineau Drive it is not of MOL value. Planning application ref. 23/1856/FUL outlines the poor quality of the existing site with little, to no, biodiversity, and green infrastructure value. To retain the site within the MOL alongside the adjacent green spaces would be unnecessarily restrictive. The current MOL boundaries are restrictive and the justification for the retention of the current boundary for parcel 31 is flawed in its accuracy and fails to take a detailed, refined approach instead taking a more overarching, generalised view of the MOL area.</p> <p>The Green Belt, MOL, LGS and OOLTI Review Final Report and Metropolitan Open Land Review Annex Report form part of the emerging Local Plans evidence base and therefore, have a significant purpose in informing the policies of the Local Plan. The inaccuracies of the evidence base would see the Local Plan not meet the requirements of the Test of Soundness in line with paragraph 35 of the NPPF. The proposed MOL boundaries are not justified, positively prepared and effective. Further details of the sites removal from the MOL has been set out below.</p> <p><b>MOL POLICIES AND RETENTION OF THE BOATHOUSE WITHIN THE MOL</b></p> <p>Draft Policy 35 “Green Belt, Metropolitan Open Land and Local Green Space” sets out the policy for the protection of the Green Belt, MOL and LGS and with the requirements for any future development in the Green Belt, MOL and LGS. Part C and D of draft Policy 35 reads:</p> <p><i>C. ‘Very Special Circumstances’ must result in the improvement and enhancement of the openness, character and use of the Green Belt and Metropolitan Open Land.</i></p> <p><i>D. When considering development on sites in proximity to Green Belt or Metropolitan Open Land, any possible visual impacts on the character, local distinctiveness, and openness of the Green Belt or Metropolitan Open Land will be taken into account.</i></p>	
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					<p>The impact on character, local distinctiveness, and openness of the MOL are key considerations for sites within and in close proximity to the MOL. With consideration to The Boathouse and the boundary of Parcel: River Thames, Area West of Old Deer Park, the policy fails to consider or account for the existing character and openness of the parcel where The Boathouse is located. The residential use of the Boathouse is in line with the character, by way of use, to adjacent Martineau Drive, which is a private residential area located to the rear of The Boathouse. Martineau Drive is located outside of the MOL boundary whilst The Boathouse is within the MOL boundary. The annex report referenced "brick walls" and "levels of vegetation" are minimal features, the brick wall fenced is minimal in its height and largely comprised of a gapped, metal bar feature opposed to a solid brick wall. The vegetation is largely located within the private amenity space of residential dwellings at Martineau Drive and provides minimal screening to the built-up area. Therefore, the residential dwellings located at Martineau Drive, although outside the MOL boundary but in close proximity, are prominent and contribute to the built-up character of the area.</p> <p>The Boathouse forms part of urban, built-up area alongside Martineau Drive, it does not positively contribute to the MOL in terms of character and openness of the MOL and is similar in its impact to residential dwellings at Martineau Drive. However, the site plays an important role in delivering residential housing in the local area and therefore, a loss of housing would be detrimental and against draft Policy 10 (New Housing (Strategic Policy)), Policy 12 (Housing Needs of Different Groups) and Policy 14 (Loss of Housing). Therefore, the failure to redefine the MOL boundary at Parcel 31 of the Annex Report would be restrictive and unjustified. The Boathouse site's character is more in keeping with that of Martineau Drive, the policies are restrictive in delivering the identified housing need of LBRuT and the justification for its continued retention is flawed and undermines the policy requirements of Policy 35 (Green Belt, MOL and LGS) given the existing and evident built-up, suburban fabric of the site.</p> <p>In short, The Boathouse should be removed from the boundary of the MOL and recognised as part of the suburban and built up area alongside the Martineau Drive urban area.</p> <p><b>HOUSING DELIVERY IN RICHMOND AND THE RESIDENTIAL USE OF THE BOATHOUSE</b></p> <p>Policy 10 "New Housing (Strategic Policy)" sets out LBRuT ten year housing target of 4,110 homes. Of this 4,110 housing target, 1,100 – 1, 200 are allocated to the Twickenham area, including St Margarets and North Twickenham. Although The Boathouse will provide replacement housing on the site, there is an identified need for housing in the area.</p> <p>Policy 12 "Housing Needs of Different Groups" outlines that:</p> <p><i>A. The loss of existing housing will be resisted where it meets identified specific community needs, unless it can be shown that:</i></p> <p><i>(1) The accommodation is no longer needed.</i></p> <p><i>(2) The existing accommodation will be adequately re-provided to an equivalent or greater standard in a different way or elsewhere.</i></p> <p><i>(3) The new accommodation will instead meet another identified priority local need.</i></p> <p>Policy 14 "Loss of Housing" will resist the loss of existing housing. The policy also outlines that redevelopment of existing housing should normally only take place where it meets the five criteria including demonstrating that the existing housing is incapable of improvement.</p> <p>Policy 16 "Small Sites" states that LBRuT will support the delivery of the small sites target of 234 new homes per annum. Furthermore, the Council will support proposals for well-designed new homes on small sites (up to 0.25 hectares) to meet local needs in line with local character and design quality policies (Policy 28).</p> <p>The current, live application at The Boathouse will seek to deliver a development that meets the policy requirements of the emerging Local Plan in relation to the delivery of housing, type of housing and quality of housing. The proposal will contribute to meeting the housing needs of LBRuT whilst delivering small site (site is 0.12ha), residential development of the highest design quality, sustainability standards and in keeping with the character of the area. Furthermore, the design proposals of the application will widen the Thames Path by up to one metre, creating an East – West open vista. The improvements to the public realm improve the safety and accessibility for local residents and visitors to the area. This is a significant benefit and the policies within this emerging plan should recognise this in relation to the site. To provide a use outlined as sympathetic within the emerging Local Plan (public and private open spaces and playing fields, outdoor recreation, sport, biodiversity, open community uses and cemeteries) to the MOL allocation would mean the loss of existing housing. The sites continued allocation as MOL and the MOL policies nullify the opportunity for the site to be retained for residential use and the delivery of high quality, well designed housing. The MOL allocation and MOL policies make the emerging housing policies redundant at The Boathouse and instead the policies set out in the emerging Local Plan are conflicting and restrictive. We consider the Local Plan to be unjustified, ineffective, and restrictive in the delivery of development that there is an identified need for.</p> <p><b>FLOODING AND DESIGN</b></p> <p>Furthermore, the existing residential building's/site location within Flood Zone 3a requires unique design considerations set out by the Environment Agency (EA). The EA required The Boathouse to be set one metre above ground level as a means of flood mitigation. Policy 8 "Flood Risk and Sustainable Drainage", Part B outlines development should provide mitigation and resilience against flood risk and advice should be sought from the EA. Through high-quality, effective design there is an opportunity to deliver design sympathetic to flood risk without compromising the character and openness of an area. The flood issues associated with the existing housing on site will be mitigated through the new scheme building.</p>	
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					<p>The current building is an eye-sore and does not contribute positively to the surrounding area. In addition, the building is not in line with building regulations and therefore, any alterations to the building will be significant to bring it in line with legislation. As part of the live planning application (LPA ref. 23/1856/FUL) the re-use of the building was looked into and it was concluded that to bring the building to be in line with building regulations would make any scheme unviable and in addition, would not be considered an appropriate flood defence to align with the EA requirements. Therefore, there is no option but to demolish the unattractive building and provide a replacement building that is in line with building regulations and the EA requirements (ie 1.6 metres higher above ground floor level etc). In light of this, the current application) proposes to raise the building line by one metre to address this requirement. As such, the Council should acknowledge this requirement to allow for any new development to align with EA requirements and accept that a modest increase in height on this site is inevitable and appropriate.</p> <p><b>SUMMARY AND CONCLUSIONS</b></p> <p>In summary, we have covered the following:</p> <p><b>1 The evidence base and the validity:</b> The evidence base used to inform the policies within this emerging, Regulation 19 version Local Plan is not accurate and takes a “blanket” and generalised approach to defining the quality of the MOL and MOL boundaries. There is a lack of flexibility in the boundaries proposed. The undermining of The Boathouse and Ranelagh Drive as a “minor road and one dwelling” and the conclusion that the “Built development is generally absent” is one that is generalised view. Whilst we do recognise there are areas of the parcel that positively contribute to the MOL and should be retained we also believe that the site is part of the built-up area that does not contribute to the MOL and therefore, should be released.</p> <p><b>2 Approach to the MOL and The Boathouse:</b> The character of Martineau Drive and The Boathouse is defined by the existing residential form and uses. Draft Policy 35, emphasises that consideration will be made to character, local distinctiveness and openness of the MOL. The Boathouse is more akin to the character and local distinctiveness of the residential setting of Martineau Drive opposed to that of the MOL and therefore, should be released from the MOL.</p> <p><b>3 Restrictive Policy and the impact on housing delivery:</b> The housing policy and MOL policy in the case of The Boathouse and other residential uses in the MOL are counter productive to one another. The housing policy sets out the need for housing and the Council’s opposition to the loss of housing whilst the MOL policies set out the need for more sympathetic uses, none of which are residential. The Boathouse would deliver a development in line with the housing policy needs whilst requiring a non residential use would be against the housing policy requirements.</p> <p><b>4 Flooding and Design:</b> Design policies within the emerging Local Plan should provide detail on the important role in recognising the role design plays in providing development that mitigates and provides resilience to flood risk. The importance on consulting the EA and adopting the design measures proposed by the EA should be acknowledged within both Flood and Design policies.</p> <p>We have highlighted some serious concerns over the justification for and implications of the proposed MOL strategy and MOL boundaries. The Council’s approach to the MOL is based on an inaccurate report and a generalised analysis of MOL land. We dispute that this approach allows for the retention of quality MOL. When viewed in context with other policy requirements and the inaccurate description and limited criterion assessment of MOL, the approach will act as a deterrent to suitable and beneficial development and actually creates further obstacles for residential developments unnecessarily included within the MOL, as opposed to promoting the delivery of identified residential housing need and the need for high quality housing. We are of the view that our client’s property, The Boathouse, should be removed from the MOL boundary.</p> <p>The contradiction between the proposed MOL and Housing strategy policy requirements results in an overall unsound approach to plan-making. When reviewed against the tests of soundness, it is clear that the approach presented does not currently conform with the National Planning Policy Framework – see table below.</p> <table border="1"> <thead> <tr> <th>Test of Soundness</th> <th>Assessment</th> </tr> </thead> <tbody> <tr> <td>Positively prepared?</td> <td>No – The policies and lack of flexibility in deciding MOL boundaries are compromising the ability of mis-profiled sites to meet the emerging housing policy. This could negatively impact the ability to deliver the identified housing needs and overall undermine the draft housing policies.</td> </tr> <tr> <td>Justified?</td> <td>No – The lack of and inaccurate justification for the approach to MOL boundaries is particularly concerning.</td> </tr> <tr> <td>Effective?</td> <td>No – The restrictive review and setting of MOL boundaries and policies present a high risk to the implementation of the Plan and delivery of housing.</td> </tr> <tr> <td>Consistent with national policy?</td> <td>No – For the reasons set out above the Plan is not consistent with Paragraphs 62, 68 and 69 of the NPPF.</td> </tr> </tbody> </table> <p>We urge the Council to take into account our assessment and review of the MOL and remove the Boathouse from MOL. Thank you for the opportunity to comment on the draft Local Plan. We wish to be involved in any future Examination Hearings and be kept up to date with the progress of the draft Local Plan.</p>	Test of Soundness	Assessment	Positively prepared?	No – The policies and lack of flexibility in deciding MOL boundaries are compromising the ability of mis-profiled sites to meet the emerging housing policy. This could negatively impact the ability to deliver the identified housing needs and overall undermine the draft housing policies.	Justified?	No – The lack of and inaccurate justification for the approach to MOL boundaries is particularly concerning.	Effective?	No – The restrictive review and setting of MOL boundaries and policies present a high risk to the implementation of the Plan and delivery of housing.	Consistent with national policy?	No – For the reasons set out above the Plan is not consistent with Paragraphs 62, 68 and 69 of the NPPF.	
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471	John Sadler, CPRE London	MOL De-designations - Paragraph 21.14	No	Justified	<p>We strongly oppose the de-designation of MOL parcels comprising front gardens to residential properties along Hampton Court Road. This is part of the network of historical sites linked to Hampton Court Palace. The relationship between Hampton Court Palace and the buildings around the green is an important relationship which has been lost in many other places by incremental change. The MOL designation of the gardens has helped to maintain this historic</p>											

						landscape. The gardens are also part of a wider green chain, and the designation helps to protect its integrity. The site could also become part of a future World Heritage site centring on Hampton Court Palace and more could be done at the same time to try and gain this status.	
472	Jane Lovell	MOL De-designation – 52 Orchard Road	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<p>Page numbers: 8 and 9/290/295/298  Paragraph numbers: (in page order as shown above using the online low res version of the draft plan).Section 2.17 provides a link to the Open Land Review conducted by Arup And I refer to the section on MOL. Open Land. Page 290 of the draft plan, Paragraph 21.8 Policy B relating to MOL. Page 295 of draft plan paragraph 21.10 and 21.11 relating to MOL.  Maps: Arup Open Land Review page 25 (linked from page 8 of the Draft Local Plan)  Arup Open Land Annexe Report page 104 (separate document linked from page 8 of the Draft Local Plan)</p> <p><b>1.0 THE SITE</b>  Land to the North of Chertsey Road forming a garden for 52 Orchard Road, Twickenham, Middlesex, TW1 1LY.  1.1 The subject site is a lawned garden area to the east of the River Crane and immediately to the west of 53 and 55 Orchard Road and numbers 3 and 4 Apple Grove. Its southern boundary is the A316, Chertsey Road and the northern boundary is 52 Orchard Road.  1.2 The site is designated on the LB Richmond proposals map as Metropolitan Open Land (MOL). The River Crane, which runs along the eastern boundary, is also designated as Metropolitan Open Land but in contrast to my garden, in all of the neighbouring properties the designation is confined to the riverbank and has not encompassed any of these gardens sharing the same characteristics. This is not only the case for my immediate neighbours, but applies to the whole of the properties along that stretch of river from 52 Orchard Road travelling north to Railshead Road (.85 hectare). There are approximately 120 properties in this area in which the River Crane runs through gardens and none has an MOL designation extending beyond the riverbank.</p> <p><b>2.0 LEGAL COMPLIANCE</b>  The Primary concern in assessing the legal compliance of the plan in respect of the soundness of this designation is whether the plan conforms generally to the London Plan and NPPF policies.</p> <p><b>3.0 CONFORMITY WITH THE LONDON PLAN</b>  3.1 Chapter 8 – Green Infrastructure and Natural Environment of the London Plan contains Policy G3 – Metropolitan Open Land, which clearly defines the four criteria for MOL designation. The policy states: MOL is a strategic designation and is allocated in accordance with The London Plan Policy 3G. Land designated as MOL should satisfy one or more of the following criteria:  1. Land that contributes to the physical structure of London by being clearly distinguishable from the built up area;  2. Land that includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole or significant parts of London;  3. Land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level;  4. Land which forms part of a Green Chain and meets one of the above criteria.  This garden meets none of the above criteria let alone two. By contrast the separately designated river bank does meet the criteria.  3.2 Policy G3 further states:  8.3.1 Metropolitan Open Land is strategic open land within the urban area. It plays an important role in London’s green infrastructure – the network of green spaces, features and places around and within urban areas. MOL protects and enhances the open environment and improves Londoners’ quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity.  This further demonstrates that the garden in question does not and cannot fulfil any of these benefits and does not warrant the MOL status.  3.3 Furthermore, in Chapter 8 - paragraph 8.3.4 states that:  Proposals to enhance access to MOL and to improve poorer quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL will be encouraged. Examples include improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage.  This would be impossible to meet given that this is a private garden with no public access.</p> <p><b>4. CONFORMITY WITH NPPF</b>  MOL is a London designation affording the same level of protection as Green Belt and in the context of this; I would refer to the following:  NPPF Policy 13 – Protecting Green Belt Land - Paragraph 138 states the following:  Green Belt serves five purposes:  a) to check the unrestricted sprawl of large built-up areas;  b) to prevent neighbouring towns merging into one another;  c) to assist in safeguarding the countryside from encroachment;  d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.  None of these purposes apply to this private garden.</p> <p><b>5. CONFORMITY WITH DRAFT LOCAL PLAN</b></p>	<p><b>ALTERNATIVE APPROACH</b>  No issue is taken with the soundness of the MOL designation along the bank of the River Crane including the section running through my garden. My recommendation would be to confine the designation to the riverbank and not to the garden in its entirety, which does not perform against any of the criteria. In my view that would not only achieve soundness, it would also continue to provide protection for that area. It would further result in an objective, transparent and fair conclusion in line with the Council’s stated aims. They have already made amendments to other MOL areas recommended within the Arup review, including the removal in some circumstances. This is not a request for removal but rather an adjustment to the boundary of the riverbank in line with the treatment of all other properties with gardens backing onto the river.</p>

					<p>Concerning this particular site, the Draft Local Plan is neither in conformity with the London Plan nor NPPF policy.</p> <p>5.1 The designation is further unsupported by statements within the Draft Local Plan.</p> <p>Page 290 of the Draft Local Plan states that:</p> <p>B. Appropriate uses within the Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, outdoor recreation and sport, biodiversity including rivers and bodies of water, open community uses including allotments and cemeteries.</p> <p>Whilst the River Crane runs alongside this site and has an MOL designation which covers the riverbank, there is no possible way in which the garden could meet any of the above stated uses.</p> <p>There is no public access and it could not meet any of the uses on the above list.</p> <p>5.2 Page 295 of the Publication Local Plan, paragraph 21.10 states that:</p> <p>Metropolitan Open Land (MOL) is unique to London and protects strategically important open spaces.</p> <p>The site in question does not match this description and the Draft Local Plan in this designation is in conflict with the overarching premise that MOL exists to protect significant areas rather than it being randomly applied to private gardens in isolation to all neighbouring properties.</p> <p><b>6. ARUP METROPOLITAN OPEN LAND REVIEW</b></p> <p>6.1 Page 298 paragraph 21.22 of the Publication Local Plan states that:</p> <p>A review of all the land designated as Green Belt, MOL, LGS (see Policy 35 'Green Belt, Metropolitan Open Land and Local Green Space ') and OOLTI was carried out, providing an up to date, objective and evidence-based assessment of how the currently protected areas contribute to the purposes / criteria set out in the relevant national/regional or local policy guidance.</p> <p>The review conducted by Arup was neither objective nor evidenced-based in relation to my garden for the following reasons:</p> <p>As referred to in the above listed documents, Page 25 of the Arup review report contains a map detailing the borough areas designated as MOL in which they have allocated numbers to the areas. My garden is numbered as 32; it is accurately shown as a discrete site and is practically obscured by the head of the map pin. This is demonstrably the smallest area of all of the designated areas, including those Arup recommended for de-designation. This further illustrates the lack of soundness in designating the area as being of strategic London importance.</p> <p>The Arup Annexe report is a separate document accessed by a separate link on the same page 8 of the Draft Local Plan, and provides a detailed categorisation for each of the numbered areas on the map and how each site performs against the four 4 MOL criteria. This methodology is used to draw their conclusions on whether to recommend retention of the MOL, review it or de-designate. Page 104 relates to my garden, but instead of mapping the plot as a discrete site as on page 25 of the first general report, referred to above, they have now incorrectly parcelled it together with the stretch of the River Crane travelling northwards into Isleworth. The map pin is placed in a completely different location from page 25, and is now sited around half a mile away.</p> <p>The garden has been misrepresented as being part of the riverbank MOL and is now described as .85 hectare (approximately 2 acres) which now has a northern boundary of Railshead Road in Isleworth over half a mile away. The MOL designation on my garden took place completely separately from that of the banks of the River Crane. The consequence of this error has led to an inaccurate analysis of the performance of the garden against MOL criteria and their subsequent conclusion that it met all four areas. They were further unable to identify that the building on the site was my house. Instead, it is described as one of two buildings of unknown use. I do not believe that they understood that this was a private garden and a separate entity from the River Crane, albeit which included the MOL on the riverbank. Had they identified the area correctly there could have been no alternative other than a recommendation to remove the designation.</p> <p>I had no knowledge that this review was taking place and Arup never requested a visit. Instead, as shown in the photograph on page 104, they created a hole in my dense laurel hedge in order to take a photograph with a further misleading narrative that it provided a "View facing north from the A316 along the southern boundary, with view of private garden and riverside woodland in the background". The woodland referred to is actually in Hounslow and had they taken the photograph in accordance with the instructions from Arup to stand on the pavement, this photograph would have accurately shown that the area is screened completely by a dense hedge and has no views, apart from the one they created for the camera. The errors and misrepresentations contained in Arup's review of my property together with their inaccurate conclusion, do not demonstrate soundness and legality. It also calls into question the Borough's assertion that this review was carried out with objectivity.</p> <p>The unprepossessing area of garden depicted in the photograph on the right hand side of page 104, further serves to demonstrate the unsoundness of the conclusion that it meets the four criteria they outline.</p> <p><b>7. PAST PLANNING DECISIONS</b></p> <p>There have been various statements in the London and Local Plan which refer to resistance of overpowering developments in the proximity of MOL. In the case of this particularly site, permission has been granted locally on several occasions for ever-increasing height extensions to a telecoms mast sited on the southern boundary. In addition, planning permission was granted at appeal for a new development – now completed – of two houses and two flats, the latter backing immediately on to the eastern boundary. These examples contradict the stated aim of protecting MOL and erode the justification for the retention of the designation of the garden as a whole. If this site really did have the protection equal to green belt, I doubt whether these structures would have been granted permission.</p> <p><b>8. SOUNDNESS/LEGALITY</b></p>
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						For reasons outlined above, which include the non-conformity with the London Plan; NPPF Policy; the Council's stated policies within the Draft Local Plan; the flawed Arup Review and the contradictory treatment of planning adjacent to MOL, it is my belief that in its current state, the Draft Local Plan is neither sound nor legal. In this particular context I also do not view the plan as being positively prepared, justified, effective or consistent with national policy.	
473	Peter Willan, Paul Velluet and Laurence Bain, <b>Prospect of Richmond</b> (and supported by the Friends of Richmond Green)	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space				[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 929... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 929 in relation to Policy 35 and the MOL Review in relation to Richmond Green]	
474	Peter Willan and Paul Velluet, <b>Old Deer Park Working Group</b>	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space				[See comment 21] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: 930... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 930 in relation to Policy 35 and the MOL Review in relation to Old Deer Park]	
-	Saffron Frost (Savills), <b>Melliss Ave Devco Limited (in Administration) c/o RSM</b>					[See comment 282 in relation to Policy 35 and Site Allocation 32]	
-						<b>Policy 36 Other Open Land of Townscape Importance (OOLTI)</b>	
475	Mark Jopling, <b>Udney Park Playing Fields Trust</b>	Policy 36 Other Open Land of Townscape Importance (OOLTI)				<b>Other Open Land of Townscape Importance (OOLTI)</b> The Trust welcomes the retention of OOLTI status for Udney Park and asks that Council commits in the Local Plan to enforce maintenance requirements on owners where a lack of maintenance decreases community amenity from the Open Land of Townscape Importance.	
-						<b>Policy 37 Public Open Space, Play, Sport and Recreation</b>	
476	John Sadler, <b>CPRE London</b>	Policy 37 Public Open Space, Play, Sport and Recreation - Additional Green Space and Parks				We believe the Council could demonstrate greater ambition for increasing the amount of green space in Richmond especially as an increase in population could leave residents with inadequate provision of green and communal open space. There is a need to reduce the recreational pressure on Richmond Park which is a special Areas of Conservation (SAR) mainly because of its importance to stag beetles. We recommend the council study how other parks and green spaces nearby can be improved to divert some of the visitors. New parks could be created in areas of the borough with not enough green space by converting 'grey space' into 'streetparks'.	
477	Martha Bailey, <b>London Historic Parks and Gardens Trust</b>	Policy 37 Public Open Space, Play, Sport and Recreation				A. Public Open Space, children's and young people's play facilities as well as formal and informal sports grounds and playing fields will be protected, and where possible enhanced. Improvements of existing facilities and spaces, including their openness and character and their accessibility and linkages, will be encouraged. B. Existing open space, play space, sports and recreational buildings and land, including playing fields, should not be built on unless: 1. an assessment has been undertaken which has clearly shown the facility, open space, buildings or land to be surplus to requirements; or 2. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or 3. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. <b>Impacts on existing provision and requiring new provision</b> D. The Council will require all major development proposals in the borough to meet the Public Open Space, play space, and playing fields and ancillary sport facilities needs arising out of the development by requiring the following: <b>Public Open Space</b> 1. Applicants should provide an analysis of existing open space provision in line with the Council's accessibility standards for travel to open spaces. Where there is inadequate existing provision and limited access to such facilities, publicly accessible facilities will be expected on-site to mitigate the impacts of the new development on existing provision.	[Regarding B.1 track change suggests] Please consider removing this point. As recognised within policy 37, the borough experiences widespread Public Open Space Deficiency. It is therefore highly unlikely that open space/land/playing fields within the borough are 'surplus to requirements.' At a minimum, please change the word 'or' at the end of this policy to 'and' - to ensure that any loss is replaced by better provision elsewhere.  [Regarding D.1 where reference is to . publicly accessible facilities... track change suggests] open space, green wherever possible,  [Regarding D.3 'where reference is to provide on-site open space...track change suggests] green open space

							<p>2. Major developments will be required to provide new on-site open space in areas of Public Open Space deficiency, as shown in the Policies Map. This will be required in addition to any external amenity space.</p> <p>3. Major developments outside of areas designated as Public Open Space deficient will need to provide on-site open space where feasible. Should such provision not be feasible, a payment in lieu will be sought as a planning obligation to enable the provision of new off-site open space, or improvements to the accessibility or quality of existing Public Open Space in the vicinity of the development. Planning obligations will also be sought towards management and maintenance of new or improved off-site open space.</p> <p>4. Any new Public Open Space provided as a result of new development should deliver multi-functional benefits, including for nature conservation and biodiversity value as well as for the health and wellbeing of future occupants and surrounding local communities.</p>	
478	Jo Edwards, <b>Sport England</b>	Policy 37 Public Open Space, Play, Sport and Recreation					<p>Support this policy and consistency of wording with National policy and the London Plan. Point 8, there may be instances where on-site provision is not feasible, practicable <b>or appropriate</b>. Sport England supports the use of CUAs and financial contributions. It would be useful to identify the basis on which contributions will be sought, e.g. through the use of Sport England's Playing Pitch Calculator to which the Council can gain access on request to us.</p>	LP37 D. 8. Where on-site provision of play space or new playing fields and ancillary facilities is not feasible, <del>or</del> practicable <b>or appropriate</b> , the Council will expect existing surrounding facilities and spaces to be improved and made more accessible to the users and occupiers of the new development through, for example, improved walking and cycling links or enhancements of play space or existing playing fields and associated sport facilities.
479	Lucy Hale (Gerald Eve), <b>St Mary's University</b>	Policy 37 Public Open Space, Play, Sport and Recreation					<p><b>Draft Sports Policy</b> St Mary's are supportive of the wording included in the Draft Policy 37 'Public Open Space, Play, Sport and Recreation' in respect of the improving and enhancing existing sports facilities and the future growth and development of the University so have no comments they wish to make.</p>	
480	Tim Catchpole, <b>Mortlake with East Sheen Society</b>	Policy 37 Public Open Space, Play, Sport and Recreation					<p><b>Theme: Increasing biodiversity and the quality of our green and blue spaces, and greening the borough (Policies 34-43)</b> <b>Policy 37. Public open space, play, sport and recreation</b> We made no comment at the Pre-Publication stage but would like to make one now. The comments we have made on Map 20.1 under Policy 31 [See comment 443]. apply here too. The map under this policy heading likewise shows the Borough floating in a vacuum and it must show the edges of the neighbouring boroughs which have open spaces and playing fields used by residents of our Borough. It should be noted, for example, that many residents and schools of East Sheen use – or rather used to use – the sports facilities (including swimming pool) at the Bank of England Sportsground in Roehampton. Alas, these sports facilities have recently been closed leaving East Sheen at a disadvantage. We note that the Prepublication Local Plan mentioned that the Borough-wide playing pitch strategy would be updated in 2022 and that the Publication Local Plan has now indicated this will be updated in 2023. It is important that the Publication Local Plan takes this strategy on board.</p>	
481	Jon Rowles	Policy 37 Public Open Space, Play, Sport and Recreation (Open Space Assessment)					<p>- The Open Space evidence report does not conform with the London Plan Guidance, All London Green Grid, and has its own classification system that is very hard to understand. For instance, Murray Park which is a large traditional park, with large playgrounds, a village hall etc is classified as an amenity green space as the council no longer marks out a football pitch in winter months (despite the local football team Whitton Wonders being desperate for more playing pitches). The version placed on the website has omitted the quality scores of each park and the companion guidance needed to fully interpret the report has not been published.</p>	
482	Mark Jopling, <b>Udney Park Playing Fields Trust</b>	Playing Pitch Strategy					<p><b>Playing Pitch Strategy</b> Regarding the January 2022 "PLAYING PITCH STRATEGY Action Plan Update" it is welcomed that Udney Park retains status as a "Key Site". However, under community ownership and with NGB and Sport England support, Udney Park has the potential to be a "Hub Site" serving the South end of the Borough as Barn Elms is a "Hub Site" for the North end of the Borough. The draft Local Plan should be revised to recognise this potential for Udney Park to provide increased community amenity as a "Hub Site" under an ACV-compliant ownership structure. We note that an update to the "2018 PLAYING PITCH STRATEGY" has not yet been made public and there were some concerns about this 2018 document which were leveraged by the first speculative owner of Udney Park at the 2020 Public Inquiry. The Trust seeks the opportunity to consult on a draft version of the new PLAYING PITCH STRATEGY, itself an important document in the next Local Plan Independent Examination.</p>	
-							<b>Policy 38 Urban Greening</b>	
483	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), <b>St George plc and Marks and Spencer</b>	Policy 38 Urban Greening	No	N o	N o	Positively Prepared; Justified; Effective; Consistent with national policy	<p>Furthermore, we continue to have concerns regarding the soundness of Policies 10, 12, 13, 17, 18, 28, 38, and 45. These concerns are as set out in our representations made at the Regulation 18 stage (which have not been fully addressed in the Regulation 19 draft). We have therefore 're-submitted' these comments which should be treated as forming part of our representations to the Regulation 19 draft (enclosed at Appendix A). [See Appendix 6, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 963 in relation to: part E should be amended as there is no evidence to justify the 70% requirement which limits space for rooftop amenity, plant/services and is too restrictive.]</p>	
-							<b>Policy 39 Biodiversity and Geodiversity</b>	

484	Jon Rowles	Policy 39 Biodiversity and Geodiversity						- Richmond has set a Biodiversity Net Gain of 20% whilst neighbouring Kingston Upon Thames has set their target at 30%. Both boroughs are very similar in terms of the built environment, and I feel the council needs to review why both authorities have come up with such a different target.	
485	Natasha Styles (The Planning Bureau Limited), McCarthy & Stone Retirement Lifestyles Ltd	Policy 39 Biodiversity and Geodiversity		No			Justified; Consistent with national policy	Policy 39 point 5. Requires development 'to provide a measurable 20% net gain for biodiversity, in line with the latest available version of the DEFRA metric'. The Council should not set a higher biodiversity net gain (BNG) requirement for development in Richmond than that set out in the Environment Act 2021. Requiring BNG above 10% does not meet the tests set out in paragraph 57 of the NPPF and in particular a greater than 10% requirement is not necessary to make the development acceptable in planning terms. A 10% requirement should be maintained in order to ensure that the requirement is 'fairly and reasonably related in scale and kind to the development' (para 57, NPPF). Although we recognise that the 10% is a minimum it should be for the developer to decide whether to go beyond this figure not the Council. It is important to remember that that it is impossible to know what the cost of delivering net gain is until the base level of biodiversity on a site is known and consequently what is required to achieve a 10% net gain. On some sites this may be achievable on site with no reduction in developable area, for others it may require a large proportion of it to be addressed offsite or a significant reduction in the developable area – a far more expensive option that could render a site unviable without a reduction in other policy requirements. The Council should therefore not require a BNG of greater than the 10%.	<b>Recommendation:</b> <b>Amend Policy 39 point 5 as follows:</b> <b>5. requiring the following development proposals to provide a measurable 1020% net gain for biodiversity, in line with the latest available version of the DEFRA metric:</b>
486	Summer Wong (RPS), Notting Hill Genesis	Policy 39 Biodiversity and Geodiversity (p.309-310)	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<b>Policy 39 Biodiversity and Geodiversity (p.309-310)</b> Policy 39 Point 5) requires almost all development (householder development and any development resulted in 1 dwelling unit or more, and non-residential development which increases floorspace) in the borough to achieve 20% biodiversity net gain (BNG). The requirement for 20% BNG goes significantly beyond the current Government legislation comprising 2021 Environment Act and the London Plan Policy G6, which requires 10% BNG on major development. Policy 39 is therefore inconsistent with national and regional policy.	<b>Recommended Amendment</b> Policy 39 Point 5) should be amended to be in line with Environment Act 2021, to require 10% BNG on major development (over 10 units and non-residential development of over 1,000sqm) only.	
487	H	Policy 39 Biodiversity and Geodiversity		No		Justified; Consistent with national policy	While the Richmond Biodiversity Action Plan seeks a net gain of specific habitats it does not specify 20%. The 20% requirement comes from emerging Policy 39 which seeks 20% BNG. This is double the requirement sought through the Environment Act 2021 and there is no justification as to why double the statutory requirement is sought. Previously, we stated that emerging Policy 39 is unsound. Policy 39 should be amended to reflect the requirements of the Environment Act. [See also comment 129 in relation to Site Allocation 4 - Car Park for Sainsburys, Uxbridge Road, Hampton]	<ul style="list-style-type: none"> <li>Policy 39 should be amended to refer to BNG of 10% in accordance with the Environment Act 2021.</li> </ul>	
488	Rachel Holmes, Environment Agency	Policy 39 Biodiversity and Geodiversity					We are pleased to see that our previous comments on the Regulation 18 consultation have been taken onboard with the inclusion of mitigation hierarchy included within the wording of this policy. The requirement for adequate and sufficiently robust information to be submitted alongside planning applications is a welcome addition to this policy. We are also pleased that you have taken on our comments in our Regulation 18 response in relation to Biodiversity Net Gain (BNG) and have specified the use of the DEFRA metric. We note that you have not specified when the use of the river metric is required; while we understand that it may not be possible to outline the detailed BNG requirements, there seems to be a lot of confusion by developers and planning applicants about when the river element of the metric is needed and is largely ignored. It would be useful to include a short paragraph in the supporting text of Policy 40 – Rivers and Corridors that highlights the river element of the BNG metric will need to be submitted where the BNG guidance advises this is necessary to ensure that the local plan's policies are robust and effective.		
489	Emma Penson (DWD), Dukes Education Group and Radnor House School	Policy 39 Biodiversity and Geodiversity	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	Policy 39 (Biodiversity and Geodiversity) states that the LBRuT will require certain development proposals to achieve 20% Biodiversity Net Gain. This percentage considerably exceeds the Environment Act 2021 which introduces a biodiversity net gain requirement of 10%, effective from November 2023. The feasibility of achieving this needs to be considered, as does whether it places a reasonable and necessary obligation on developers. We consider this suggested figure is not justified and should be removed from the plan. Policies on Biodiversity Net Gain also need to acknowledge that for sites like Kneller Hall that are already very green and with high biodiversity value, where much of the site is being untouched or protected it is not realistic for development to meet a score of 10% or 20%. The policy needs to acknowledge that there will be site specific circumstances where this is not achievable, to ensure that appropriate and sustainable development is not constrained from coming forward.		
490	Louise Cole	Policy 39 Biodiversity and Geodiversity, Paragraph 21.65	Yes	Yes	Yes		I fully support this paragraph of the proposed local plan. The policy unequivocally underpins the need for urgent practical conservation action for urban building-dependent endangered red-listed birds. These species include swifts, house sparrows, starlings, swallows, house martins and bats. Furthermore, the guidance given of a benchmark of 'one nest brick per dwelling on average' is extremely helpful so that developers will be in no doubt as to what is required, in relation new buildings and building extensions. The policy guidance also complies with the British Standard BS 42021:2022.		
491	Mike Priaulx, Swifts Local Network: Swifts & Planning Group	Policy 39 Biodiversity and Geodiversity, Paragraph 21.65	Yes	Yes	Yes		Supportive of this paragraph, especially reference to one nest brick per dwelling on average, which implements British Standard BS 42021:2022.	Not applicable.	

492	David Wilson, <b>Thames Water</b>	Policy 39 Biodiversity and Geodiversity, M085 Hampton Water Treatment Works and Reservoirs Nature Conservation Designation		No		Consistent with national policy	<p>Policy 39 Biodiversity - M085 Hampton Water Treatment Works and Reservoirs Nature Conservation Designation</p> <p>In the Review of Sites of Importance for Nature Conservation in Richmond upon Thames, it is recommended that Hampton Water Treatment Works (WTW) SINC is upgraded to a Site of Metropolitan Importance and amalgamated with Stain Hill and Sunnyside Reservoirs to create 'Hampton Water Treatment Works and Reservoirs' Site of Metropolitan Importance.</p> <p>Hampton WTW is a key operational site which should not be unduly constrained by additional planning designations. It is considered that the proposal to upgrade the WTW to a site of metropolitan nature interest is flawed based on the presence of all of the WTW infrastructure development on the site similar to industrial processes and that the proposed upgrade is not evidenced from site surveys. The reservoirs identified are part of the water treatment process and are not suitable for the creation and enhancement of new habitats, as it is important that they are able function fully in line with operational requirements. Furthermore, the full developed Hampton WTW site is also proposed to be included, which is anomalous as it is a developed site with buildings, roads and hardstanding, and no natural/green space. The assessment of the site sets out 'potential' to improve biodiversity conditions. These suggestions of reduced mowing is considered to be fundamentally incompatible with the operation, as there are clear justifications for mowing the grass in operational areas, as it is important for the inspection and identification of any risks or structural issues.</p> <p>Thames Water has strong commitments to biodiversity to its regulator, Ofwat, which includes identifying Sites of Biodiversity Interest where biodiversity can be enhanced at specific sites without affecting operations.</p> <p>Whilst certain areas may be temporarily not be in use they are retained for future operations and will be key to London's ongoing water supply improvements.</p> <p>We therefore object to this proposal to upgrade the nature designation.</p>	Remove Metropolitan Grade wildlife designation from Hampton WTW.
-							<b>Policy 40 Rivers and River Corridors</b>	
493	Gary Backler, <b>Friends of the River Crane Environment (FORCE)</b>	Policy 40 Rivers and River Corridors	Yes	No	Yes	Positively Prepared	Policy 40: We note that paras 21.91-92 are set out under the subheading "Thames Policy Area".	Policy 40: We would like the requirements of para 21.92 which refer explicitly to the Thames to refer equally explicitly to the River Crane; and to include a clear statement protecting all river corridors, including the Crane, as dark corridors, protected from light and noise. An explicit "Dark Corridor" Policy or SPD would give greater reassurance of protection, and might help to resolve tensions with the hierarchy of criteria for floodlighting in Policy 43. Use of the term "dark corridor" in para 21.118 would be helpful in this regard.
494	Kay Collins (Solve Planning), <b>Port Hampton Estates Limited</b>	Policy 40 Rivers and River Corridors					<p><b>River-Related Uses</b></p> <p>Policy 40 relates to the protection of rivers and river corridors in the Borough. This includes the protection of river-dependent and river-related uses and which will apply to Platt's Eyot and future redevelopment proposals.</p> <p><b>Policy 40. Rivers and river corridors</b></p> <p>...</p> <p><i>Riverside uses, including river-dependent and river-related uses</i></p> <p><i>F. The Council will resist the loss of existing river-dependent and river-related uses that contribute to the special character of the River Thames, including river-related industry (B2) and locally important wharves, boat building sheds and boatyards and other riverside facilities such as slipways, docks, jetties, piers and stairs. This will be achieved by:</i></p> <ol style="list-style-type: none"> <li><i>1. resisting redevelopment of existing river-dependent or river-related industrial and business uses to non-river related employment uses or residential uses unless it can be demonstrated that no other riverdependent or river-related use is feasible or viable;</i></li> <li><i>2. ensuring development on sites along the river is functionally related to the river and includes river-dependent or river-related uses where possible, including gardens which are designed to integrate and enhance the river, and be sensitive to its ecology; Increasing biodiversity and the quality of our green and blue spaces, and greening the borough</i></li> <li><i>3. requiring an assessment of the effect of the proposed development on the operation of existing river-dependent uses or riverside gardens on the site and their associated facilities on- and off-site; or requiring an assessment of the potential of the site for river-dependent uses and facilities if there are none existing;</i></li> <li><i>4. ensuring that any proposed residential uses, where appropriate, along the river are compatible with the operation of the established riverrelated and river-dependent uses;</i></li> <li><i>5. requiring setting back development from river banks and existing flood defences along the River Thames</i></li> </ol> <p>As with the employment policies, we generally support the provisions of this policy but we consider that it needs to address the situation where site specific conditions which may preclude meeting all or some of these objectives. Alternatively, this could be addressed in the site specific text and final policy for Platt's Eyot.</p>	
495	Rachel Holmes, <b>Environment Agency</b>	Policy 40 Rivers and River Corridors					<p><b>Riverside Strategy Approach</b></p> <p>We welcome that Part A of Policy 40 – Rivers and River Corridors has been updated to reflect how flood risk works can also benefit the biodiversity of the river corridor.</p> <p><b>Policy 40 – Rivers and River Corridors</b></p> <p>There is an 8 metre buffer zone policy in paragraph 21.89. We are pleased to see that this includes culverted watercourses, however, this is an important policy, and we would strongly recommend that this is moved into the Rivers and River Corridors policy box (not just in the supporting text). We note that it is in the main policy box of the Flood Risk and Sustainable Drainage Policy but not the Rivers one. We are pleased to see that this buffer policy also includes culverted watercourses.</p>	



						<p>We would also strongly recommend that in conjunction with this buffer zone policy, the council requires a Landscape and Ecological Management Plan detailing how this buffer will be protected and enhanced in the long-term. This is in line with our previous Regulation 18 comments.</p> <p>We welcome the specification of the interrelated nature of Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy) &amp; Policy 40 – Rivers and River Corridors within paragraph 21.89.</p> <p>We are pleased to see that Part A of this policy has been expanded to include better access to rivers, the creation of new habitats, and improvements to flood defences and storage. As per our comments to the Regulation 18 consultation, this policy should acknowledge the need to bring all waterbodies in the borough into good ecological status/potential in line with WFD requirements.</p> <p>While we welcome the inclusion of River Thames specific policy wording, other waterbodies should be referenced and included within the policy. The WFD is an important aspect that should be mentioned within the policy as it's a key piece of legislation that we will assess developments against. This policy should be specific about the nature of the development adjacent to rivers with stronger wording to support this in order to ensure that development meets the objectives of the WFD.</p> <p>We suggest that this policy is updated with the following suggested wording:  “Development on sites that contain a watercourse or are situated next to a watercourse will comply with the following principles:</p> <ul style="list-style-type: none"> <li>• Unless exceptional circumstances are demonstrated for not doing so, development should be set back 16m from the landward side of Thames Tidal flood defences, and 8m from the top bank of all other main rivers (including fluvial sections of the Thames).</li> <li>• Development proposals that include culverting and hard bank protection, including sheet piling, will not be permitted.</li> <li>• Buffer zones should be planted with locally native species of UK genetic provenance and free from any formal landscaping, including gardens.</li> <li>• To reduce light spill into the river corridor outside the buffer zone, all artificial lighting should be directional and focused with cowlings, in line with guidance for the reduction of intrusive light produced by the Institute of Lighting Professionals.</li> <li>• Where watercourses have been historically modified adjacent to or within development sites, the watercourse should be restored to a natural state. This includes the de-culverting of watercourses, re-naturalisation of riverbanks and restoring the natural width/depth of a watercourse where it has been degraded.</li> <li>• Where barriers to fish movement (e.g., weirs) are present in a watercourse adjacent to or within a development, the design should include the removal of that barrier, or where not feasible, measures to allow for the natural movement of fish within the watercourse.</li> <li>• A management plan for the undeveloped buffer zone should be produced to ensure biodiversity is maintained. Where invasive species are present, these should be included to ensure they are not spread as a result of the development.”</li> </ul> <p>As previously highlighted, the DEFRA Biodiversity Net Gain Metric will assess land within 10m of the river as part of the river habitat. Including the requirement for a 10m buffer will aid developers in achieving a minimum 10% biodiversity net gain.</p> <p>Public access (D) should not impinge upon or preclude the future greening of a buffer zone between new development and the river wall. Ideally walkways and footpaths should respect this buffer zone and be set back from the top of bank to allow for a naturalised buffer between the river and the engineered environment. Our starting point for new development on tidal rivers is a 16m buffer.</p> <p>We are pleased to see that in paragraph 21.96 they state they will support initiatives to de-culvert rivers where it is feasible and practicable to do so. We would also strongly recommend that they add that they are opposed to culverting watercourses as well because of the adverse ecological, flood risk, human safety and aesthetic impacts. This was also requested previously.</p> <p>We are also pleased to see that you have taken on board our comments in relation to fish passage in paragraph 21.90.</p>	
-						<b>Policy 41 Moorings and Floating Structures</b>	
496	Suzanne Parkes, Elmbridge Borough Council	Policy 41 Moorings and Floating Structures				<p><b>Policy 41 – Mooring and Floating Structures</b></p> <p>This policy sets out the presumption against new proposals for houseboats, including extensions to existing houseboats, and other moorings or floating structures designed for permanent residential use.</p> <p>In our response to the Regulation 18 Consultation, we stated that it was unclear how this policy was justified and welcomed seeing the evidence base that supports this draft policy. [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1000 in relation to Policy 41]</p> <p>Following our Regulation 18 response, it is noted that a Gypsy and Traveller Research report was updated in 2022 and that riverboat dwellers were considered as part of this. The conclusion being that there is no evidence to suggest that there is any need to introduce new provision for riverboard dwellers in the borough. It is also noted that no requests for moorings from the community and no reports of unauthorised moorings of riverboats have been made.</p>	



						It also noted that the ongoing London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA) by RRR may help improve the understanding of mooring provision and identify additional need. EBC requests that it is kept informed of the progress of the London-wide GTANA.	
497	Rachel Holmes, <b>Environment Agency</b>	Policy 41 Moorings and Floating Structures				In our Regulation 18 response, we recommended that the wording in Policy 41 – ‘Moorings and floating structures’ should be strengthened, however this recommendation has not been taken forward as part of the Regulation 19 Local Plan. Row 997 of your ‘Statement of Consultation – Local Plan’ (dated June 2023) provides justification for not progressing with this recommendation. We are satisfied with this reasoning and content with the proposed wording for this policy. Any new moorings or floating structures that could bottom out on a falling tide and preclude intertidal mudflat habitat should as a requirement incorporate a timber or metal grid structure to ensure mudflat is preserved and future maintenance to reinstate the bed is not required.	
-						<b>Policy 42 Trees, Woodland and Landscape</b>	
498	John Sadler, <b>CPRE London</b>	Policy 42 Trees, Woodland and Landscape				We believe there is scope for actively increasing Richmond’s woodland cover by pushing out the boundaries of existing woodland, planting on buffer land, and linking up green sites with strips of woodland and hedgerows. There is also a need for thinking how woodland planting on part of some sites could complement existing land uses – for example by providing a buffer between traffic and amenity area or increasing the diversity and interest of green spaces. For example, Old Deer Park needs more planting to screen the park from the A316. Similarly woodland planting between developed land or agricultural land can play a role in reducing flood risk and improving water quality. There is scope for connecting up sites better, and planting hedgerows for buffers to traffic. Many parks could have avenue of trees planted along the paths.	
499	Martha Bailey, <b>London Historic Parks and Gardens Trust</b>	Policy 42 Trees, Woodland and Landscape				A. The Council will require the protection of existing trees and the provision of new trees in accordance with London Plan Policy G7 (Trees and Woodlands), as well as shrubs, hedgerows and other vegetation of landscape significance that complement existing, or create new, high quality green elements, which deliver air quality, climate change, amenity and biodiversity benefits. B. To ensure development protects, respects, contributes to and enhances trees and landscapes, the Council, when assessing development proposals, will: <b>Trees and Woodlands</b> 1. resist the loss of trees, including aged or veteran trees, unless the tree is dead, dying or dangerous; or the tree is causing significant damage to adjacent structures; or the tree has little or no amenity value and it is not possible to retain the tree as part of the development; or felling is for reasons of good arboricultural practice; 2. resist development that would result in the loss or deterioration of irreplaceable habitat such as historic parkland; 3. require that site design or layout ensures a harmonious relationship between trees and their surroundings, and will resist development which will be likely to result in pressure to significantly prune or remove trees; 4. require all developments to minimise impacts on existing trees, hedges, shrubs and other significant vegetation on site and on adjoining land, and provide sufficient space for the crowns and root systems of existing and proposed trees and their future growth. Developments within proximity of existing trees are required to provide protection from any damage during development; 5. require, where practicable, an appropriate replacement for any tree that is felled; where this is not possible, a financial contribution to the provision for an off-site tree in line with the monetary value of the existing tree to be felled will be required in line with the ‘Capital Asset Value for Amenity Trees’ (CAVAT); 6. require new trees to be of a suitable species for the location in terms of height and root spread, taking account of space required for trees to mature; the use of native species as well as large-canopied species are encouraged where appropriate; 7. where appropriate and relevant, require the provision of large-canopied tree lined streets as set out in the NPPF; 8. require that trees are adequately protected throughout the course of development, in accordance with British Standard 5837 (Trees in relation to design, demolition and construction – Recommendations).	Please add an addition two points here [at Policy 42 B] 9. Assess proposed planting schemes against potential impacts on the character of historic landscapes and open spaces. 10. Encourage planting in areas of hardstanding. These two points can be expanded below with the following text; <i>It should be borne in mind that where trees are planted within existing parks and landscapes they may disrupt historic planting schemes and create a sense of enclosure by breaking up previously open spaces. The environmental and social impacts of tree planting are maximised when areas of hardstanding are selected.</i>
-						<b>Policy 43 Floodlighting and Other External Artificial Lighting</b>	
500	Jo Edwards, <b>Sport England</b>	Policy 43 Floodlighting and Other External Artificial Lighting				Sport England supports this policy that considers the positive benefits of sports lighting. Reference to Sport England’s Guidance is welcomed.	
501	Rachel Holmes, <b>Environment Agency</b>	Policy 43 Floodlighting and Other External Artificial Lighting				Lighting; Lighting should be informed by guidance set out in the <a href="#">Artificial Lighting Guidance - Buildings, planning and development - Bat Conservation Trust (bats.org.uk)</a> in addition bird species may also be affected by artificial lighting creating a false dawn and using up vital reserves, especially in the winter. Direct overlighting of the watercourse is not permitted as this affects the diurnal rhythms of fish species.	
-						<b>Improving design, delivering beautiful buildings and high-quality places</b>	

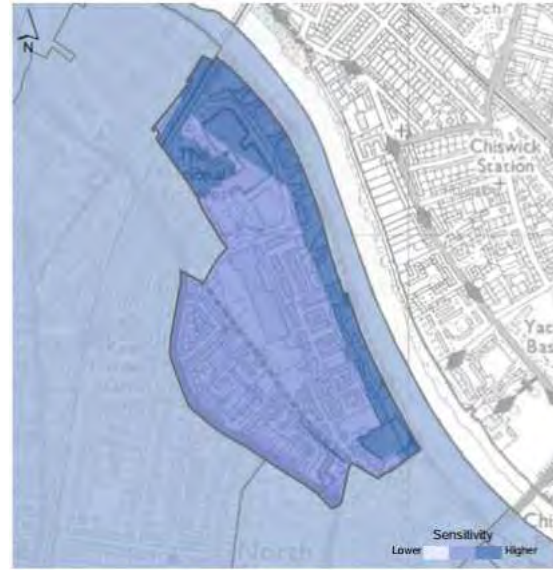
502	Tim Catchpole, Mortlake with East Sheen Society					<p><b>Theme: Improving design, delivering beautiful buildings and high quality places (Policies 44-46)</b></p> <p><b>Policy 44. Design Process</b></p> <p><b>Policy 45. Tall and Mid-rise building zones</b></p> <p><b>Policy 46. Amenity and living conditions</b></p> <p>[See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments – comment 1016 in relation to Policy 44, comment 1025 in relation to Policy 45, and comment 1040 in relation to Policy 46]</p> <p>We accept that that these policies are separate from Policies 28-33 but would rather see them follow on than appear separated towards the end of the document where they seem less important. The Design Process is fundamental to creating a man-made environment, it's not just about facades and footprints, and should surely have higher billing.</p>	
-						<b>Policy 44 Design Process</b>	
503	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 44 Design Process				<p>[See comment 21] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ...1018...</p> <p>[See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1018 in relation to Policy 44]</p>	
504	Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 44 Design Process				<p>[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 1019...</p> <p>[See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1019 in relation to Policy 44]</p>	
-						<b>Policy 45 Tall and Mid-Rise Building Zones</b>	
-						<b>Note comments on the St Clare (Hampton Hill) Mid-rise Zone have been collated against the Place based strategy for Hampton &amp; Hampton Hill to group with similar comments.</b>	
-						<b>Note comments on the Teddington Mid-rise Zone have been collated against the Place-based Strategy for Teddington &amp; Hampton Wick to group with similar comments.</b>	
505	Jenny & Rod Linter	Policy 45 Tall and Mid-Rise Building Zones and Teddington mid-rise Zone		N o	Justified	<p>On my capital Ring walks, I have been both surprised and horrified at the clusters, or zones of tall apartments which have become the vogue for much of London. The Greater London Authority, the Conservative Party and Local Authorities have received much criticism for their lack of investment in housing. It is not, however, just a numbers game, because attention must be paid to the demographics of an area, migratory movements of population, the existing built environment, the changing economy, property prices locally, the local hydrology, the marketing of properties abroad, local vested interests, local services available, and the consequences of land use change. Forgive me if my comments appear naïve – I am new to the whole issue of long term planning, and I can see that you have much to consider.</p> <p>If the 15year plan is accepted, I understand that it would allow for the introduction of “mid-rise” apartments of 5-6 storeys on the existing Teddington Business Park in Station Road. I am a little confused because in the Council documents, 6 storeys is more correctly identified as “tall” buildings. The term mid-rise would therefore seem to be inappropriate, As such height would dominate and overshadow neighbouring properties.</p> <p>The physical impact of clusters ( more than 3 blocks) or zones of tall buildings is alarming, because such a development would be at odds with the existing built environment. Within and close by Station Road Business Park are Listed buildings, buildings with Townscape merit and Conservation Areas ( the converted Christ Church – now 6 luxury apartments, the Clarence Hotel, Teddington Railway Station, numerous buildings in Teddington High Street, Albert Rd, Victoria Road, Elmfield House and the Teddington Cheese Shop). These are all within eye-line of the current business Park and would be significantly over-shadowed by a zone of tall apartments. Furthermore, the neighbouring roads are predominantly 2 storey Victorian and Edwardian dwellings. A cluster of modern tall apartment blocks would be out of place with the existing suburban residential properties, completely overshadowing them. If it's not too rude, I would suggest that Informer House is out of place and should never have been allowed. A concentration of more tall buildings would be very intrusive, and in addition to the eyesores proposed, a cluster would literally divide Teddington in two. Then there's the issue of exorbitant property prices in Teddington. The cost of Semi-detached properties in LBRT have risen 25% since 2018 to an average of £1.3 million. Terraced properties have escalated 25% to £870k on average. Flats have risen 9% to £500k, on average. Reality shows that prices have made it impossible for people in the 20's, 30s and 40s to afford to buy homes in Teddington. Outsiders can not afford to move in and young adults who grew up here are forced to move away. This is clearly reflected in the population pyramids for Teddington in 2001, 2011 and 2021, which show clear indentations for those age groups. The % of population in those age groups who can not afford to buy family homes is significantly higher than for London as a whole. As a result, Teddington's population has grown just 0.22% since 2011. Surely it is better to focus on providing and maintaining local employment, in order to help retain young</p>	

						<p>working adults, and to discourage them from moving further out of London. The Business Park is well designed, offering space for both offices and storage and is a asset to the town. There is no reason why more flexible use could be made of this purpose built Park. Affordable family homes, in keeping with the existing built environment are needed. Please could you explain if there are any controls over the type of dwellings that would be allowed. Who would the new apartment blocks be aimed at and would they satisfy local needs? Recent developments seem to discriminate against young people, families and those requiring support in the form of social housing. The apartments in the former Christ Church in Station road sold for £1.7million each. I understand that some of these are Buy to Let. The luxury Teddington Riverside Development, built 5 years ago, contains 217 apartments, ranging in price from £620,000 for a 1 bed to £1,840,000 for a 3-bed. A whole block, called Haymarket House, with 47 apartments stands empty. It comes as no surprise that 52% are unsold, and that buyers are either wealthy singles/ couples or retirees. Families are not catered for- it's as simple as that. City Developments Ltd, responsible for the Riverside Apartments, is based in Singapore, and certainly doesn't help satisfy local needs. Some of the apartments that have been sold are actually Buy to Let, and have been purchased for investment, in many cases by people based abroad. Savills actively market luxury apartments in Hong Kong, Singapore and other far distant shores. I therefore request again that instead of luxury apartments, consideration is given to young families, as they have been priced out of the market. This will have a knock-on effect on school numbers in the future, and you will be aware that some schools in central London ( Southwark) face closure because of falling numbers. With respect to new developments, it should never be a numbers game in response to " more housing is needed, " rather an attempt to provide a balanced supply to mixed housing needs. Forgive me if I have misunderstood the point of feedback, but to me these seem to be critically important.</p> <p>If planning permission is given for a whole zone of tall apartment buildings, does that mean demolition of the existing buildings on the business park? As I understand it, the construction industry is currently being watched very carefully, because demolition and rebuilding accounts for unacceptable carbon emissions, as it necessitates the manufacture of 2 lots of construction materials. This would not look good for Richmond Borough, given that we are experiencing a climate crisis. Additionally, if the existing buildings were demolished, yet more landfill would be created. It makes no sense.</p> <p>I am concerned about the increased potential demand for water from a significant increase in housing, and the capacity of sewers to cope with a large local increase in population. I am also concerned about increased traffic on our roads, both during demolition and construction, but also once the development is finished. Already, Broad street and the High Street are blighted by buses linking Heathrow, Twickenham, Richmond, Kew, Kingston, Tolworth, Hampton, Hampton Court and Hampton Wick. We never seem free of them, and half the time they are empty, which seems bizarre when air quality, public health and climate crisis are high on people's agendas. In summary, I don't feel that clustering of tall apartments in outer boroughs is the answer to providing housing for growing populations. It favours the wealthy, creates environmental challenges in its wake, and is at odds with Victorian and Edwardian suburban residential areas and historic town centres like Teddington. Thank you for all that you do to look after the borough, but please give due consideration to the points that I've made,</p>	
506	Tim Brennan, <b>Historic England</b>	Policy 45 Tall and Mid-Rise Buildings				<p><b>Policy 45 – Tall and Mid-Rise Buildings</b></p> <p>As with our previous consultation response, we support this policy and consider that it is appropriately underpinned by relevant and up to date evidence in the form of the Urban Design Study. We would again however recommend that the policy should refer in bullet point 1 to a need to 'avoid harm' to heritage assets rather than to 'respect the views and vistas' towards them. This wording is clearer and therefore more effective.</p> <p>We would also suggest that areas identified as appropriate for these buildings at appendix 3 continue to contain a degree of ambiguity, both in terms of boundaries and the colour coding within them. While we appreciate that a degree of flexibility is helpful in certain situations, in the interests of clarity and as per para 16d of the NPPF, we consider that a greater degree of precision is needed in relation to a number of draft site allocations. This is in order to properly understand the potential impacts on heritage assets and to avoid any harm.</p>	
507	James Sheppard (CBRE), <b>LGC LTD</b>	Policy 45 Tall and Mid-Rise Building Zones Urban Design Study 7. Place-based Strategy for Teddington & Hampton Wick	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<p><b>Urban Design</b></p> <p>Initial designs demonstrate that a net-gain in employment floorspace can be delivered on the LGC site, whilst simultaneously providing homes and a policy compliant level of much needed affordable homes. Crucially, these aspirations can be delivered in a sensitive form that fully considers the surrounding urban design context. The site is wholly inefficient and there is an opportunity for the Council to support the site's comprehensive redevelopment, meeting a range of policy aspirations, in a considered form. Through technical assessment, including townscape, a range of low-mid height buildings of high-quality can be delivered.</p> <p>The place-based strategy for Teddington and Hampton Wick, as presented in the updated ARUP Urban Design Study (2023), confirms the area as being home to significant assets in the science and life sciences sectors, including LGC, with the proximity of Teddington town centre and railway station providing good transport links into central London. The Urban Design Study designated the site within Character Area B2 – Teddington Residential (sub-area B2a).</p> <p>The character area appraisal within the study broadly comments that the Teddington Residential area has a high sensitivity to change. Notably however, the appraisal confirms negative qualities that do not contribute to the character of the area. Primarily, it has been assessed that the large, gated complex of the National Physical Laboratory (including LGC) has a negative impact on the adjacent Coleshill and Blandford Roads, with metal fencing and blank facades. It was also commented that there a lack of incidental green space in the locality. The urban design quality of the site and surrounds of LGC can therefore be demonstrably improved through considered redevelopment.</p>	<b>3. Mid-Rise Building Zone:</b> sub-area B2a should be included as a 'mid-rise building zone'.

						<p>Through initial illustrative designs there is an opportunity to provide those incidental, publicly accessible green spaces, whilst opening the site up, becoming outward facing, connected with its surroundings and enhancing permeability through the site.</p> <p>The B2 character area appraisal concludes by noting “the coarser urban grain and existing taller buildings in the area around the National Physical Laboratory (sub-area B2a) provides potential opportunity to accommodate development or intensification whilst addressing and improving some of the negative qualities”.</p> <p>It follows therefore that although most of the borough is characterised by areas that have a high degree of sensitivity to change, the LGC site is one of the few areas that can accept change. It is strongly considered that any change through redevelopment in this sub-area, could be progressed in a form that is highly beneficial to the urban design context. It is in this vein that we strongly consider that the site is appropriate for designation as suitable for ‘mid-rise’ buildings. It is acknowledged that the site’s location and proximity to sensitive landscapes, such as Bushy Park to the South, would preclude the site from being suitable for tall buildings.</p> <p>However, given the site’s only ‘moderate sensitivity’ to change (as illustrated in <b>Figure 123 of the Urban Design Study 2023</b>), we would strongly advocate that sub-area B2a should be included as a ‘mid-rise building zone’. Mid-rise buildings are defined in the Publication Local Plan under <b>draft Policy 45</b>, as being “buildings which do not trigger the definition of a tall building but are 5 storeys or over (up to 6 storeys), or 15 metres or more from the ground level to the top of the building (whichever is lower)”.</p> <p>Any future proposed redevelopment of the site for mixed-use, as demonstrated through an illustrative masterplan for the site, as presented to Council officers, could fulfil the criteria as set out in <b>draft Policy 45c</b>. Mid-rise buildings could be carefully located and designed to step down to surrounding existing and proposed buildings, namely Coleshill Road and Queens Road; would respond positively and protect the setting of existing buildings including heritage assets; respect the scale, width and proportion of adjacent streets and valued features; and deliver a varied and interesting roofline.</p> <p>It is noted that <b>draft Policy 45d</b>, makes an allowance for mid-rise buildings outside of the identified mid-rise building zones where they are within or adjacent to areas which include buildings taller than the prevailing height. However, given the site’s assessed moderate sensitivity to change, we advocate for its inclusion as a mid-rise building zone. Indeed, <b>draft paragraph 22.30</b> concedes that further suitable sites for mid-rise buildings may become available, particularly those sites which allow for a comprehensive scheme with mid-rise at its centre while still integrating well with the locality, with lower height at the periphery to avoid imposing negatively on the surroundings.</p> <p>In addition to the above, the conclusions reached in <b>section 4.2 of the Urban Design Study</b>, state that the LGC site has been assessed as having a relatively ‘low probability of change’. Through continued dialogue with the Council, it has been documented that the LGC site is no longer fit for purpose, is wholly inefficient and ineffective, and must change in the shorter term to ensure business and scientific needs are met into the future. As such, we consider this evidence to be incorrect and misleading. We have previously requested that this probability of change is increased to ‘high (shaded green)’.</p>	
508	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), <b>St George plc and Marks and Spencer</b>	Building Heights – Site Allocation 31 (Kew Retail Park), Place Based Strategy for Kew and Policy 45	No	No	No	<p>Positively Prepared; Justified; Effective; Consistent with national policy</p> <p><b>Building Heights – Site Allocation 31 (Kew Retail Park), Place Based Strategy for Kew and Policy 45 Context (Regulation 18 Representations)</b></p> <p>In summary, our representations to the Regulation 18 consultation recommended that the following changes were made:</p> <ul style="list-style-type: none"> <li>- The criteria for assessing the acceptability of a tall building should be undertaken on a site-by-site basis, and not solely constrained to within Tall Building Zones (i.e. commentary should include scope acknowledging that a tall building might be acceptable beyond the boundaries of Tall Building Zones, depending on their context and potential impacts on surrounding townscape character and the borough’s historic environment).</li> <li>- Amend restrictive and prescriptive policies relating to specific height parameters.</li> <li>- Amend draft policies to comply with national planning policy, as well as strategic planning policies set out within the London Plan (2021).</li> </ul> <p>Following this, representations were made on the Consultation Draft of the Local Views Supplementary Planning Document (SPD), which closed for consultation on 5 September 2022.</p> <p><b>Regulation 19 Representations</b></p> <p>We have reviewed the Regulation 19 draft and the below provides a critical assessment of the Urban Design Study 2023 evidence base document and emerging policies set out in the Regulation 19 Draft Local Plan, with specific regard to the Place Based Strategy for Kew (including Site Allocation 31: Kew Retail Park, Bessant Drive, Kew). Specifically, we consider that the building height parameters set out in Site Allocation 31: Kew Retail Park, the Place Based Strategy for Kew and Policy 45: Tall and Mid-Rise Building Zones (insofar as they relate to Kew Retail Park) are not justified by the evidence base which supports them, and as a consequence, are unnecessarily restrictive and not consistent with National Planning Policy requirements (including the requirement to be in general conformity with the London Plan). Paragraph 31 of the NPPF (2021) states that “<i>the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.</i>”</p> <p>Paragraph 35 of the NPPF (2021) concerns the examination of plans, stating, “<i>Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:</i></p>	

					<p>a. <i>Positively Prepared</i> – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.</p> <p>b. <i>Justified</i> – an appropriate strategy, taking into account the reasonable alternative, and based on proportionate evidence.</p> <p>c. <i>Effective</i> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>d. <i>Consistent with National Policy</i> – enabling the delivery of sustainable development in accordance with policies in the Framework and other statements of national planning policy, where relevant.”</p> <p><b>Urban Design Study 2023</b></p> <p>Like the 2021 version prepared to support the Regulation 18 Pre-Publication Draft Local Plan, we continue to support the underlying principles of the Urban Design Study and the need to identify locations where tall development will be supported by the local planning authority (subject to detailed design rationale and justification). Such an approach is underpinned by regional strategic policy set out in Policy D9 (Part B) of the London Plan (2021).</p> <p>Whilst we support the general philosophy and approach (including the adopted matrix for assessing the ‘Development Capacity’ for a site), we continue to disagree with Arup’s conclusions in relation to the ‘East Kew Mixed Use’ Character Area, particularly identifying the area as having a ‘Medium Sensitivity’.</p> <p>At Page 231, the Character Area Strategy for Character Area G3: East Kew Mixed Use sets some overarching principles for the area. This includes aspirations to ‘Improve’ and ‘Transform’ the area, noting that the existing character is ‘disjointed’ and lacks a ‘cohesive identity’. It is also identified that there is a long-term opportunity to transform the character of the area, looking to improve the ‘sense of place, public access and townscape legibility’.</p> <p>It is noted here that the list of ‘negative qualities’ for the East Kew Mixed Use area has been further developed from the 2021 Urban Design Study, which is welcomed. This now includes the acknowledgement that the Kew Retail Park site is home to commercial buildings of poor architectural quality.</p> <p>The ‘valued features’ presented within the study include a list of five features related to the surrounding landscaped and river setting. It continues to be our view that these valued features can be summarised under one single entry, with five entries considered to be excessive and included to counterbalance the large number of ‘negative features’. We recommend that the ‘valued features’ entry is summarised as follows:</p> <p><i>“The area’s dense vegetation coverage, including areas designated as OSNI and SINC (borough grade II) at Kew railway bridge Kew Meadow Path, provides a perception of greenness and screening in relation to the River Thames, providing the perception of an extensive landscape setting which positively contributes to the River’s setting.”</i></p> <p>As noted in the Urban Design Study, the Kew Retail Park site lacks:</p> <ul style="list-style-type: none"> <li>- A cohesive layout;</li> <li>- has poor legibility;</li> <li>- contains buildings of poor architectural quality; and</li> <li>- large areas of hardstanding which lack any streetscape or townscape qualities.</li> </ul> <p>The Site differs greatly from its surrounding context, both in terms of use, scale and character. It is considered that the Kew Retail Park site makes no contribution to the character of the surrounding Victorian and Edwardian suburbs to the east of Kew Road, and detract from the high-quality residential townscape across the neighbouring sub-character areas. These detracting elements are also at odds with the relatively high-quality modern residential development at Kew Riverside and associated landscaped areas close to the river, which the Site makes no contribution to.</p> <p>Within the Urban Design Study, ‘Sensitivity’ is measured in three shades of blue. Darker shades indicate areas of highest sensitivity, whilst lower shades are shown in paler colours. Character Area G3: East Kew Mixed Use includes two shades, at the medium and highest levels of sensitivity identified within the Urban Design Study (see <b>Figure 1</b>).</p> <p>Figure 1: East Kew Mixed Use Sensitivity Plan (Figure 284, Page 235)</p>	
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As noted above, the Site lacks architectural quality. It shares boundaries with low-scale residential development to the north and western edges, whilst bordering the Kew Riverside development to the east. It is acknowledged that such boundaries, particularly the Site's northern and western boundaries, carry a degree of sensitivity, given the potential for a greater appreciation for intensified development/built form if the Kew Retail Park were to come forward for redevelopment, though given the lack of contribution the Site makes to the surrounding residential context, including the setting of the northern conservation area of Defoe Avenue, the sensitivity of the East Kew Mixed Use area requires a more granular assessment, with the centre of the Kew Retail Park site judged as having a Low sensitivity as a result. Owing to the broad nature of assessment undertaken within the Urban Design Study, we recognise that a granular assessment of the Kew Retail Park might not be considered appropriate as forming part of the Local Plan process. However, if a granular assessment cannot be undertaken, then a consistent approach must be adopted throughout the study. It is noted here that in regard to the Mortlake Riverside Character Area (Area H1), it is acknowledged that there may be small areas of lower sensitivity where the townscape is less intact and does not reflect the positive character described in the 'Key Characteristics'. This commentary should be included in regard to East Kew Mixed Use area, as we see the Kew Retail Park site as constituting an area of Low sensitivity.

In Arup's Methodology (see Page 399), it is noted that whilst a 'Low' sensitivity should not be interpreted as any development can occur, it does signify that features and characteristics may mean that the area can accommodate change more easily. Again, given the negative qualities of the Site and the identification of the area as having a strategic vision to 'Transform' and 'Improve', this suggests a lower sensitivity, particularly on the Kew Retail Park site.

Concerning findings of 'Probability of Change', we continue to question Arup's finding that the Kew Retail Park site has a medium probability, given that the site has been provisionally allocated for a 'Comprehensive residential-led redevelopment' with a 'range of commercial uses, including retail, offices and leisure'. Given the draft allocation, it is therefore accepted that the Council anticipate significant redevelopment of the Site within the next plan period. It is also widely known that our client is progressing with emerging design proposal for the Kew Retail Park site, which is at an early stage of design development and pre-application engagement with LBRuT. Reference is made to such pre-application engagement in the Urban Design Study (see page 378), so it is clear such development is anticipated to come for in the short-medium term.

In this regard, we further question the criteria set out on Page 401, Table 9 of the Urban Design Study, in that only existing site allocations and sites located within a Main Centre or Twickenham Action Plan can be identified as having a High Probability of Change. Future and emerging site allocations should be included, as well as areas with an existing and emerging masterplan, and at a well progressed stage of the planning process. Owing to the above, we note here that the Development Capacity of the Kew Retail Park site should be scored at a 6 or 7, rather than the current understated finding of 5. We also note here a discrepancy between the Development Capacity plan on Page 313 (Figure 370) and the Tall Building assessment for Kew Retail Park in Appendix A (Page 378), which appears to note the Site has a Capacity of 'Low to Medium'. We reiterate here that the Capacity of the Site should be **Medium to High**.

#### Tall Building Zone and Height on Kew Retail Park

The Urban Design Study includes the identification of 'Tall Building Zones' and 'Mid-rise Building Zones'. These are said to have been informed by the identified constraints and opportunities identified in the preceding sections of the Study, which we have previously raised concerns with in the preceding paragraphs and do not repeat here.

As part of our Regulation 18 representations (see Appendix A) [See Appendix 6], we raised concern with the lack of testing of a masterplan of greater height at the Kew Retail Park site, as well as the prescriptive wording of the tall building zone 'Appropriate Height' finding of 7-storeys. This included the lack of supporting information and evidence base to illustrate the extent of visibility of an 8-storey development scenario on the site, with reference made only to a 9-storey masterplan/scenario.

The 2023 Urban Design Study continues to provide a high-level assessment for assessing the potential impacts arising from a developed masterplan that includes a variation of heights across the Kew Retail Park Site. On page 378, the Study notes that only a single 7-storey block in the centre of the Site was tested, so to understand visibility from the wider area.

We have significant concerns with this approach, as this only concerns visibility in longer distance views from the surrounding area, and does not include a more granular assessment from various viewpoints informed by a detailed analysis of the surrounding townscape and visual amenity, particularly from more local, intimate locations where a 7 or 8 storey building at the centre of the Site would most likely be screened by surrounding built form which accords with the principles set out in the Mid-Rise Building Zones. In such scenarios, we question whether an 8-storey block would be materially more impactful than a 7-storey block.

Further to the above, concerning visibility, we cast doubt on the findings set out in the Urban Design Study, particularly concerning visibility of a 7-storey block at the centre of the Kew Retail Park site. We also question the scenario which tested a range of building heights across the Site, from 4-9 storeys, which identified adverse impacts from the taller buildings on the character of the surrounding smaller scale streets (2 storeys), including the conservation area to the north and houses to the west. It is also stated on page 380, that taller heights also adversely affected views from the opposite riverbank within LB Hounslow, 'skewing proportions and the relationship with the existing Kew Riverside development and trees fronting the River Thames.

Figures 2 and 3 below show Zones of Theoretical Visibility (ZTV) for a 7-storey block (21m) within the identified 'Tall Building Zone' at the centre of the Site (Figure 2), and an 8-storey (24m) option (Figure 3) in the same position. Both scenarios included a 50m (L) by 20m (W) block of built form, noting that the mass included no articulation, architectural detail and/or design refinement. Importantly, the ZTVs help illustrate that there is a limited increase in visibility caused by the 8-storey block, with any visibility from the Royal Botanical Gardens at Kew anticipated to be screened by dense vegetation on its eastern boundary (much of which is evergreen – noting here that ZTVs generated in VuCity does not take into account tree coverage/foilage).

Figure 2: Zone of Theoretical Visibility (7 Storeys)



Figure 3: Zone of Theoretical Visibility (8 Storeys)



For reference we include an axonometric image of both massing models used to inform the above ZTVs at Figures 4 and 5. This includes a 7-storey scenario (Figure 4) and an 8-storey scenario (Figure 5).

Figure 4: Axonometric View of 7 Storey Scenario



Figure 5: Axonometric View of 8 Storey Scenario



Further to questioning the findings concerning visibility and adverse impacts noted above, we continue to raise our concerns with Figure 439 presented on Page 378 of the Study, which continues to illustrate an unrealistic masterplan on the Kew Retail Park Site, with no articulation to roofscape and building forms, with the highest point located at the northern and southern ends of the site, in particularly sensitive locations.

The evidence base supporting the prescriptive and restrictive 'Appropriate Height' of 7 storeys (21m) within the Tall Building Zone at Kew Retail Park casts doubt on the potential impacts arising from a development which varies in height up to and including 8-storeys.

If further testing over and above that presented within this representation is not undertaken, we continue to suggest that a broader approach is taken to heights across the Site, setting a ranged figure between 5-8 storeys, with the acceptability of any future proposal based on its own merits (both architecturally, aesthetically and functionally), with clear and convincing justification provided at a planning application stage.

Such an approach has been taken to other Tall Building Zones across the Borough, including Lower Richmond Road, North Sheen (7-8 storeys), Richmond Station Tall Building Zone (7-8 storeys) and Twickenham Station Tall Building Zone (7-9 storeys). It is unclear why such an approach has not been taken in regard to Kew Retail Park.

It is clear that there is an opportunity to significantly improve the quality of the Site and create a new destination for the borough, with the scale of development optimised, given the site's urban location.

**Place-Based Strategy for Kew**

We note that this policy, as currently worded, seeks to ensure future development at Kew Retail Park accords with the restrictive development parameters set within the Urban Design Study (2023). This includes requiring development to accord with the prescriptive height datum of 7 storeys within the identified 'Tall Building Zone'.

We anticipate the potential impacts arising from a development of 8-storeys within the Tall Building Zone (noting here that there would naturally be stepping down of height towards the edges of the Site and articulation in both roofscape and massing), would not be materially greater than that of a 7-storey scenario, with a limited increase in visibility from the surrounding locality. Differences in visibility between both scenarios is set out clearly at Figures 2 and 3 above.

We therefore suggest that the prescriptive wording of this Policy is revised, so to include a more ranged figure (between 7-8 storeys), with commentary requiring any future buildings of height on the site to be supported by sufficient justification, including a comprehensive Heritage, Townscape and Visual Impact Assessment.

**Site Allocation 31: Kew Retail Park**

We welcome the Council's inclusion of additional background analysis in the commentary supporting Site Allocation 31: Kew Retail Park, which now includes a comprehensive summary of the baseline considerations and sensitivities, including the identification of key heritage assets likely to be affected by its future redevelopment. We also welcome the continued inclusion of the Site within the Draft Local Plan, highlighting its strategic position in being able to contribute to housing targets and ensuring the best and most efficient use of land is realised.

We do continue, however, to raise concerns with reference to the prescriptive height parameters noted within the proposed allocation. Based on our findings (as noted above), we judge the allocation for Kew Retail Park unsound in its current form, as is not supported by a sufficient evidence base to support such specific (restrictive) height parameters.

**Policy 45 – Tall and Mid-Rise Building Zones**

In the preceding text, we have set out and demonstrated that the supporting evidence base that underpins Policy 45: Tall and Mid-Rise Building Zones is unsound, lacking the necessary assessments and analytical detail to support specific and prescriptive height parameters within identified Tall Building Zones. We have also cast doubt on the supporting baseline information available to the Council and Inspector, including the Zone of Theoretical Visibility and the additional adverse effects identified for 8-storey development at the Kew Retail Park Site (see Figures 2 and 3).

We find the drafting of Policy 45 equally unsound. We also urge the Council to adopt less restrictive wording within the policy, particularly Part A.10 which states that tall buildings should not exceed the appropriate height range identified for each of the Tall Buildings Zones. As we have demonstrated, in relation to Kew Retail Park, this is overly prescriptive and requires a ranged figure, as well as more nuanced commentary.

As part of our Regulation 18 representations, we provided suggested amendments to the wording of the Policy 45: Tall and Mid-Rise Building Zones, and provided justification which we considered necessary to make it sound. For completeness, we set below as tracked changes our recommendations on amendments to the Regulation 19 definition

of Policy 45: Tall and Mid-Rise Building Zones, as necessary to make the Policy sound. This is based on our findings set out in the preceding paragraphs and summary text below.

**Policy 45**

**Tall and Mid-Rise Building Zones**

**Definitions:**

Buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be **tall buildings**.

Buildings which do not trigger the definition of a tall building set out above, but are 5 storeys or over, or 15 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be **mid-rise buildings**

A. Proposals for tall buildings will only be appropriate in Tall Building Zones identified on the Policies Map and in Appendix 3, where the development would not result in any adverse visual, functional, environmental or cumulative impacts, having regard to all criteria set out in London Plan Policy D9. To take account of the local context, proposals for tall buildings should address the following criteria:

Visual Impacts

1. Tall buildings should respect the views and vistas towards heritage assets across the borough and in neighbouring boroughs, including distinctive roof line features.
2. The location of tall buildings should avoid substantial visual interruptions in areas with otherwise very consistent building and/or roof lines.
3. Tall buildings should respond to the analysis of views and vistas (Policy 31 'Views and Vistas') towards the site to ensure the form and detailing are sympathetic to the wider context.



4. Tall buildings should consider the design of the lower, middle and upper parts of the tall building and how they work together as well as with the surrounding area and mid-range and long-range views.
5. Development proposals should be supported with ~~visual impact analysis graphic 3D modelling~~ to assess the individual and cumulative impact of the proposal on both the existing and emerging skyline, and on day-time and night-time views, in line with Policy 44 'Design Process'
6. Development proposals affecting the setting and approaches of the Kew World Heritage Site, must address all criteria set out in Policy 32 'Royal Botanic Gardens, Kew World Heritage Site'

Spatial Hierarchy

7. The massing of tall buildings should ~~respond to~~ respect the proportions of their local environment, including the consideration of the width of adjacent streets as well as public open spaces, parks and watercourses, and should be designed so as not to overwhelm the street and adjacent context.
8. In cases of tall buildings located close to the street edge, proposals should incorporate measures to soften their edges and provide positive public spaces at their base ~~through the use of generous walkways and mature planting.~~
9. Proposals for Tall Buildings will not be permitted outside the identified Tall Building Zones (see Appendix 3).
10. ~~Proposals for tall buildings should not exceed the appropriate height range identified for each of the Tall Building Zones in Appendix 3. The height of tall buildings will be required to step down towards the edges of the zone as indicated on the gradient map unless it can be demonstrated that this would not be appropriate in the local context~~

Fire Safety

11. Developments should achieve the highest standards of fire safety in accordance with London Plan Policy D12. All residential development over 30m in height must be designed to provide two staircases.

**Tall and Mid-Rise Building Near the River Thames Frontage**

- B. Proposals for tall and mid-rise buildings should address the following criteria:
  1. The design of tall buildings and mid-rise buildings fronting the River Thames must respond to views towards them as well as from them.
  2. In areas of larger-scale riverfront buildings, landward facing orientation should be considered and ~~respond stepping down~~ appropriately to the surrounding context, so to provide a transition towards the existing character and scale.
  3. The design of tall buildings and mid-rise buildings should maintain the river frontage as a public resource. Developments should ~~respond to be set back to~~ physically and visually ensure the Thames Path acts and feels like a welcoming public route without heavy overlooking from adjacent riverside residences. Ground floor uses should seek to activate the space as far as possible.



### Mid-Rise Buildings

- C. Proposals for new mid-rise buildings or extensions to existing buildings which increase their height to 5 storeys or over, will usually only be appropriate in Mid-Rise and Tall Building Zones identified on the Policies Map and in Appendix 3. Proposals will be required to meet the requirements of Policy 44 'Design Process' and Policy 28 'Local Character and Design Quality (Strategic Policy)', and should:
1. be carefully located and designed to ~~respond~~ ~~step down~~ to surrounding existing and proposed buildings;
  2. respond positively to and ~~conserve~~ ~~protect~~ the setting of existing buildings in the surrounding area, including heritage assets and their setting;
  3. respect the local character, including the scale, width and proportion of adjacent streets and watercourses, and potential effects on key characteristics, valued features and sensitivities as outlined in the character area profiles in Section 3 of the Urban Design Study;
  4. deliver a varied and interesting roofline in response to surrounding architectural styles, avoiding long monotonous blocks of development and/or excessive height.
  - ~~5. where proposals are located within identified Mid-Rise and Tall Building Zones, buildings should not exceed the appropriate height identified in Appendix 3;~~
  6. in cases of mid-rise buildings located close to the street edge, proposals should incorporate measures to soften their edges and provide positive public spaces at their base ~~through the use of generous walkways and mature planting.~~
- D. Proposals for mid-rise buildings may be permitted outside the identified Mid-Rise and Tall Building Zones where they are:
1. located in a town centre (Whitton, Teddington, Twickenham, Richmond and East Sheen); the Character Area Design Guidance in the Urban Design Study should be considered, where relevant, to demonstrate appropriateness to local context; and/or
  2. within transitional areas to Tall Building Zones; and/or
  3. within or adjacent to areas which include buildings taller than the prevailing height or are subject to substantial redevelopment; and/or
  4. a result of land assembly which enables the creation of a comprehensive scheme; and/or
  5. close to strategic roads and good public transport accessibility; and
  6. able to meet Part C of this policy.

### Summary

Further representations are made in relation to Policies 29 (Designated Heritage Assets), 30 (Non-Designated Heritage Assets) and 31 (Views and Vistas) in Section 5 below.

Based on these representations, we make the following recommendations to the London Borough of Richmond upon Thames and the Planning Inspectorate concerning the Publication Draft Local Plan (Regulation 19), and its supporting evidence base:

*Supporting Evidence Base: Urban design Study (2023)*

- Further consideration to be taken to the emerging context within identified Character Areas, particularly in relation to the emerging masterplan at Kew Retail Park, which is at an early stage of design development and pre-application engagement with LBRuT. It is judged that the identified Probability of Change of Medium does not reflect this, nor the draft site allocation which is now at an advanced stage of adoption.

- A highly conservative approach has been taken to the identification of the Kew Retail Park as having a Medium sensitivity, which does not reflect the low-quality environment seen across the Site and its negative contribution to the surrounding context.

- Based on the 'broad-brush' approach taken throughout the Urban Design Study, specific height recommendations for Tall Building Zones should be amended to a ranged figure, similar to the approach taken to other Tall Building Zones within the Urban Design Study.

- Further analysis is still required for Kew Retail Park, including the testing of an 8-storey development scenario. Visibility of such a scenario has been presented within this representation. Further testing is required, including a more varied masterplan, with variations/ articulation in relation to orientation, scale, height and massing. Concerns are also raised with the masterplan tested at Figure 439 (Page 378) of the Urban Design Study.

						<p>- As stated within the Study, a 'broad brush' approach has been taken to the assessment, which has been undertaken on a borough-wide scale and is 'not intended to be exhaustive or detailed' (Page 321). It is also acknowledged on Page 319 of the Study that every new development will need to consider the specific context of the plot/ Site, and that all development proposals will need to show further detailed analysis at a specific site scale and should have sensitive consideration of the building's massing, form, style and materials (Page 321). In relation to Kew Retail Park, therefore, the Study should acknowledge its limitations and clarify that tall buildings (above the prescribed 7 storeys, or proposed ranged figures as noted above) could be acceptable with appropriate and contextual detailed design and supported by necessary justification. It is noted here that in relation to the Stag Brewery site, Officers noted within the published Committee Report (22/0900/OUT that 'Whilst the site is within a tall building zone, the heights exceed the parameters of the Brief and Urban Design Study 2023, and do not meet elements of Policy D9 of the London Plan. Notwithstanding such, on balance, this is acceptable, with additional height mainly centrally located, scaling down to the perimeters, achieving a suitable relationship with the adjacent townscape...'. We consider, therefore, that being overly restrictive in policy terms and within the supporting evidence base could prevent the optimum planning outcomes being achieved.</p> <p><i>LBRuT Publication Draft Local Plan (Regulation 19)</i></p> <p>- Criteria for assessing the acceptability of a tall building should be undertaken on a site-by-site basis and not solely constrained to within Tall Building Zones.</p> <p>- Amend restrictive policies relating to specific height parameters, noting the concerns raised with the evidence base underpinning such policies.</p> <p>- Amend draft policies so to comply with national planning policy as well as strategic policies set out in the London Plan (2021). In relation to Site Allocation 31: Kew Retail Park, this includes removing overly restrictive references to prescriptive height parameters, especially when such parameters are supported by 'broad-brush' findings and an unsound evidence base (as noted above). We continue to propose amendments to Site Allocation 31 so to require development to be of a high architectural quality, informed by a thorough, site specific assessment, including an assessment of the prevailing townscape character of the area. We also recommend that the text is amended so to require a future applicant to demonstrate how the proposed development corresponds with and to the surrounding character areas, including Kew Residential and Kew Gardens, whilst also requiring the submission of a full and detailed Heritage, Townscape and Visual Impact Assessment, justifying any height proposed across the site</p>		
509	Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer	Policy 45 Tall and Mid-Rise Building Zones	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<p>Furthermore, we continue to have concerns regarding the soundness of Policies 10, 12, 13, 17, 18, 28, 38, and 45. These concerns are as set out in our representations made at the Regulation 18 stage (which have not been fully addressed in the Regulation 19 draft). We have therefore 're-submitted' these comments which should be treated as forming part of our representations to the Regulation 19 draft (enclosed at Appendix A). [See Appendix 6, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1038 in relation to: Policy 45.]</p>	
510	Martha Bailey, London Historic Parks and Gardens Trust	Policy 45 Tall and Mid-Rise Building Zones					<p>Proposals for tall buildings will only be appropriate in Tall Building Zones identified on the Policies Map and in Appendix 3, where the development would not result in any adverse visual, functional, environmental or cumulative impacts, having regard to all criteria set out in London Plan Policy D9. To take account of the local context, proposals for tall buildings should address the following criteria:</p> <p><u>Visual Impacts</u></p> <ol style="list-style-type: none"> <li>1. Tall buildings should respect the views and vistas towards heritage assets across the borough and in neighbouring boroughs, including distinctive roof line features.</li> <li>2. The location of tall buildings should avoid substantial visual interruptions in areas with otherwise very consistent building and/or roof lines.</li> <li>3. Tall buildings should respond to the analysis of views and vistas (Policy 31 'Views and Vistas ') towards the site to ensure the form and detailing are sympathetic to the wider context.</li> <li>4. Tall buildings should consider the design of the lower, middle and upper parts of the tall building and how they work together as well as with the surrounding area and mid-range and long-range views.</li> <li>5. Development proposals should be supported with graphic 3D modelling to assess the individual and cumulative impact of the proposal on both the existing and emerging skyline, and on day-time and night-time views, in line with Policy 44 'Design Process'.</li> <li>6. Development proposals affecting the setting and approaches of the Kew World Heritage Site, must address all criteria set out in Policy 32 'Royal Botanic Gardens, Kew World Heritage Site '. [...]</li> </ol>	<p>Please add a bullet point below [to Visual Impacts] to identify that tall buildings should have due regard for impact on open spaces: 'Development proposals for taller buildings must demonstrate consideration of the impact on public open space. Impacts may include views in and out of open spaces, the provision of natural light and overshadowing – which can be hugely detrimental to the amenity value and horticultural productivity of green open spaces'.</p>
511	Katherine Drew, The Royal Parks	Policy 45 Tall and mid-rise building zones					<p>In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again. [See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1021 in relation to tall buildings around the Parks]</p>	
512	Smruti Patel (Avison Young),	Policy 45 Tall and Mid-Rise Building Zones		No		Consistent with	<p>Section A, Part 11 of draft policy 45 requires all buildings over 30 metres in height to be provided with two staircases. We note that this approach is broadly consistent with the Greater London Authority's Statement regarding fire safety</p>	

	Avanton Richmond Developments LTD					national policy	and tall buildings <sup>3</sup> and the proposed changes to the Building Regulations. The Developer strongly supports the provision of a second staircase in buildings that meet the identified threshold. However, draft policy 45 does clarify the method of measurement. The draft policy should be amended to ensure measurement is taken in accordance with the Building Regulations – from ground level to the finished surface of the floor of the top storey of the building (ignoring any storey which is a roof-top machinery or plant area or consists exclusively of machinery or plant rooms). To note, this method of measurement has also been accepted by the Greater London Authority and the HSE <sup>4</sup> <sup>4</sup> <a href="https://www.gov.uk/guidance/fire-safety-and-high-rise-residential-buildings-from-1-august-2021">https://www.gov.uk/guidance/fire-safety-and-high-rise-residential-buildings-from-1-august-2021</a> [See also comment 263 in relation to Site Allocation 29: Homebase, Manor Road, North Sheen, the Urban Design Study and building heights]	
513	Henry Brown (The Planning Lab), Royal Botanic Gardens Kew	Policy 45 Tall and Mid-Rise Building Zones	Yes	No	Yes	Effective; Consistent with national policy	Policy 45: Tall and Mid-Rise Building Zone RBGK has a particular interest in the tall and mid-rise building zones in close proximity to Kew Gardens – namely, F1 (Richmond Station), F3 (North Sheen) and G3 (Kew Retail Park). Kew Gardens WHS is particularly sensitive to the impacts of tall buildings in these locations and therefore RBGK is very keen to see that this policy provides appropriate protection. We remain concerned that the policy, supporting text and detail set out in Appendix 3 do not consistently specify that the heights set out in Appendix 3 are a ‘maximum’ – Appendix 3 refers to an ‘appropriate height’, the policy wording to an ‘appropriate height range’ and supporting text para. 22.24 to an ‘appropriate tall building height range’ as well as an ‘identified maximum appropriate height’. If it is the intention that the identified heights are a maximum, rather than an expectation for all development in these zones, this needs to be consistently expressed across the relevant parts of the Plan. This approach is required to conform with Policy D9 of the London Plan, which notes that in locations where Boroughs determine tall buildings are an appropriate form of development, they must determine the maximum height that could be acceptable.	
514	Jonathan Blathwayt, GLA on behalf of Mayor of London	Tall Buildings					Policy 45 sets out a definition of Tall Buildings that is in line with the minimum height stated in Policy D9 of the LP2021 and as such is welcomed, as is the policy stating that such buildings are only appropriate in the identified Tall Building Zones. The policy also takes account of the protected strategic views and the Kew World Heritage Site which is consistent with Policies HC3 and HC2 in the LP2021 respectively. The Tall Building Zones are identified on map 22.1 within the Plan and Appendix 3. These maps highlight both the areas appropriate for Tall Buildings and Mid-Rise Buildings and use a gradient to show the suitability for respective heights. However, this means the maps are unclear as to which areas are appropriate for tall buildings and which are appropriate for Mid-Rise buildings. A clearer spatial definition of Tall Building appropriate zones is recommended.	
515	Rachel Holmes, Environment Agency	Policy 45 Tall and Mid-Rise Building Zones					With reference to Tall and Mid-Rise Building Near the River Thames Frontage B. This policy should include the expectation that developments will require an overshadowing assessment. Overshading affects diurnal rhythms of fish species and leads to limited growth of vegetated areas and thus could result in inadvertent negation of policies 8, 9, 34 and 39. We have provided comments on several policy units relating to Water resources and quality, Land Contamination and Waste. Whilst the following recommendations for each policy do not affect the soundness of the plan, they could strengthen each respective policy and the overall the Local Plan.	
516	Neil Henderson (Gerald Eve), Reselton Properties	Policy 45 Tall and Mid-Rise Building Zones		No		Positively Prepared; Justified; Effective; Consistent with national policy	We wish to reiterate our comments made in Response to the Regulation 18 Consultation process, dated 31 January 2023. [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1030 in relation to Policy 45]	Policy 45, Sub Section A- The policy as drafted is too prescriptive and gives no opportunity for consideration of detailed design being able to influence the extent to which a location is capable of being able to accommodate a tall building. This is particularly the case when identifying individual areas for a mixture of tall and mid-rise zones. The precise location within the zones for tall buildings should be subject to detailed design and consideration against the tall buildings policy framework of D9. It is therefore suggested that the drafting should be amended as follows "Proposals for tall buildings will NORMALLY only be appropriate in tall building zones". Appendix 3 and the Policies Map do not appear to have been issued for consultation so we reserve the right to comment further on the issue at Reg 19 Stage.
517	Summer Wong (RPS), Notting Hill Genesis	Policy 45 Tall and Mid-Rise Building Zones (p.328-330)	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<b>Policy 45 Tall and Mid-Rise Building Zones (p.328-330)</b> Policy 45 defines ‘mid-rise buildings’ that are over 5 storeys or over, or 15 metres or more from the ground level to the top of the building (whichever is lower). Part C) of the policy states that new mid-rise buildings or extensions to existing buildings will usually only be appropriate in the Mid-Rise and Tall Building Zones identified on the Policy Map and in Appendix 3. Notting Hill Genesis welcome the designation of the middle part of St Clare Business Park (Hampton Hill) as part of the ‘Mid-Rise Building Zone’ in Appendix 3 and on the Policy Map.	
518	Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of	Policy 45 Tall and Mid-Rise Building Zones					[See comment 15] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ... 1032, 1033... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1032 in relation to Policy 45 and comment 1033 in relation to high rise development]	

	Richmond Green)						
519	Peter Willan and Paul Velluet, <b>Old Deer Park Working Group</b>	Policy 45 Tall and Mid-Rise Building Zones					[See comment 21] We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan – Publication Version for the reasons set out in our previously submitted comments: ...1034, 1035... [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1035 in relation to Policy 45 and comment 1034 in relation to high rise development]
-	Gerard Manley (Firstplan), <b>Baden Prop Limited</b>						[See comment 250 in relation to Site Allocation 25, the tall-building zone and the Urban Design Study]
-	Geoff Bond, <b>Ham &amp; Petersham Association &amp; Amenities Group</b>						[See comment 230 in relation to high and mid sized buildings in Ham]
-							<b>Policy 46 Amenity and Living Conditions – no comments received</b>
-							<b>Reducing the need to travel and improving the choices for more sustainable travel</b>
520	Katherine Drew, <b>The Royal Parks</b>	Reducing the need to travel and improving the choices for more sustainable travel					In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again. [See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1049 in relation to the impact of traffic and associated air pollution on designated sites and priority habitats and impacts to be mitigated]
521	Jonathan Blathwayt, GLA on behalf of <b>Mayor of London</b>	Transport					The Mayor has recently adopted the Sustainable Transport, Walking and Cycling London Plan Guidance. This guidance is in relation to Policies T1, T2 and T3 of the LP2021. Richmond should apply the guidance to ensure that walking and cycling are supported and the Mayor's Healthy Streets approach is implemented and to support the Mayor's strategic target for 80% of all trips in London to be made by foot, cycle or public transport by 2041.
522	Duncan McKane, <b>London Borough of Hounslow</b>	Reducing the need to travel and improving the choices for more sustainable travel Transport and Highways Impacts					Transport and Highways Impacts LBH note that LBRuT have not produced a strategic transport study and/or a highways impact assessment to support the Regulation 19 consultation on the Publication draft Local Plan. Following our most recent duty to cooperate meeting, it is understood that LBRuT are intending to draw together existing transport and highways information that has assisted LBRUT to understand the likely traffic impact of the Local Plan into a Background Paper, and that this will be shared with interested parties later in the Summer of 2023. Unfortunately, because this information is not available to review at the time of the Regulation 19 consultation, LBH Transport officers have not been able to assess the potential cumulative impacts of LBRuT's proposed housing growth on both the road network and public transport demand locally. It is noted that there are a number of large site allocations located close to the shared boundary which are proposed for residential, amongst other uses (see list above). Given the proximity of these sites to key roads and junctions which cross the shared boundary (specifically the A316 Great Chertsey Road / A312 Hampton Road West/Uxbridge Road, B361 Whitton Road / Whitton Dene and South Circular A205) and the lack of information relating to minimum development quanta for residential units and other non-residential floorspace within the allocations themselves, LBH are not able to determine whether LBRuT's current proposals would be acceptable in terms of transport and highways impacts. Given the above, LBH raise a holding objection until such time as the evidence relating to the assessment of transport and highways impacts can be reviewed. Should this information demonstrate that there would be no significant cumulative impact upon the road network and public transport demand which would result in cross-boundary issues, LBH will withdraw its objection prior to the commencement of LBRuT's examination hearings.
-	Richard Carr, <b>Transport for London (TfL)</b>						[See comment 11 in relation to a strategic transport assessment]
-	Tim Catchpole, <b>Mortlake with East Sheen Society</b>						[See comment 529 in relation to traffic modelling evidence]



-	Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common					[See comment 530 in relation to this theme and Policy 47]							
-						<b>Policy 47 Sustainable Travel Choices (Strategic Policy)</b>							
523	Sammantha Rose, National Highways	Policy 47 Sustainable Travel Choices (Strategic Policy) (traffic modelling)				<p><b>Policy Comments</b></p> <p>We have also provided additional comments on those key policies relevant to National Highways below:</p> <p><u>Policy 47 Sustainable Travel Choices (Strategic Policy)</u></p> <p>This policy sets out the need to assess the impact of developments and that all major planning applications will need to include a full transport assessment and travel plan, which must be completed in accordance with Transport for London (TfL) guidance. If the proposals share a boundary with the SRN or are likely to generate a significant/ severe traffic demand on the SRN, National Highways will also need to be consulted. However, for Local Plan allocations, it is expected that traffic impacts, and any sustainable transport mitigation or capacity enhancements to the SRN, which are necessary to deliver (the proposals) strategic growth, should be identified as part of the plan-making process. This would be set out in an Infrastructure Delivery Plan (IDP), which sets out the infrastructure that is required to deliver the objectives, policies and development proposals set out within the Local Plan.</p> <p>National Highways has yet had sight of any traffic modelling affecting the SRN, should it affect the SRN, or had any input to the IDP. We are not aware of any SRN impacts that have been identified. We would appreciate clarification and confirmation.</p>							
524	Richard Carr, Transport for London (TfL)	Policy 47 Sustainable Travel Choices (Strategic Policy)				<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Policy 47. Sustainable Travel Choices</td> <td>We support the potential requirement in part B to provide financial contributions towards increased capacity or improved infrastructure. However public transport capacity constraints may also apply in higher PTALs and so the wording should make it clearer that there is a potential requirement for contributions to public transport in all areas, regardless of PTAL. The level and type of mitigation will be informed by a multi-modal impact assessment. Part C could refer to implementing measures that are identified through an Active Travel Zone (ATZ) Assessment in line with the Healthy Streets Approach Part H should refer to safeguarding existing transport infrastructure in addition to safeguarding transport schemes.</td> <td> <p>We reiterate our comments on the need for public transport capacity constraints to be mitigated for developments in higher PTALs. A congested station may have a high PTAL but a contribution to increase station capacity would be both justified under NPPF and the London Plan and necessary for the development to go ahead.</p> <p>We also repeat our request for a reference to an Active Travel Zone Assessment either in part C or accompanying text.</p> <p>We welcome amended wording in part H which now requires safeguarding for transport schemes and infrastructure set out in the London Plan or the Council's Local Implementation Plan.</p> </td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Policy 47. Sustainable Travel Choices	We support the potential requirement in part B to provide financial contributions towards increased capacity or improved infrastructure. However public transport capacity constraints may also apply in higher PTALs and so the wording should make it clearer that there is a potential requirement for contributions to public transport in all areas, regardless of PTAL. The level and type of mitigation will be informed by a multi-modal impact assessment. Part C could refer to implementing measures that are identified through an Active Travel Zone (ATZ) Assessment in line with the Healthy Streets Approach Part H should refer to safeguarding existing transport infrastructure in addition to safeguarding transport schemes.	<p>We reiterate our comments on the need for public transport capacity constraints to be mitigated for developments in higher PTALs. A congested station may have a high PTAL but a contribution to increase station capacity would be both justified under NPPF and the London Plan and necessary for the development to go ahead.</p> <p>We also repeat our request for a reference to an Active Travel Zone Assessment either in part C or accompanying text.</p> <p>We welcome amended wording in part H which now requires safeguarding for transport schemes and infrastructure set out in the London Plan or the Council's Local Implementation Plan.</p>	
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525	Craig Hatton, Network Rail (Southern)	Policy 47 Sustainable Travel Choices (Strategic Policy)				<p>Part C of this policy states references access the need to provide for inclusive mobility as a result of new development. Network Rail agree with this and also believe that such an approach could and should be broadened out to include access to rail stations where these new developments are in close proximity. By not linking development with access to rail stations, as a key part of the public transport network, the Plan fails to accord with its strategy within Policy 1.</p> <p>Part H of this policy states “Where appropriate, ensure that their development proposals safeguard land required for transport schemes and infrastructure set out in the London Plan and/or the Council’s Local Implementation Plan”.</p> <p>Network Rail agree that appropriate land for transport should be safeguarded as part of development proposals. This will need to be based on existing and future operational requirements and does not preclude the provision of this infrastructure alongside other forms of development, should this be appropriate and not impact upon operational requirements.</p> <p><b>Conclusions</b></p> <p>The Local Plan advocates active travel and utilisation of public transport as well as encouraging car free and car lite development. This approach is laudable and one that Network Rail supports however it cannot be said that the Plan goes far enough in implementing this aim. There are opportunities around rail stations that the Council have not included reference to which could help to facilitate and deliver on this. In failing to fully consider and address these opportunities, the Plan does not support its own strategy of ‘living locally’ and facilitating access for all users to public transport. [See other comments in this schedule - 62 on Policy 1 and on the place-based strategies and site allocations 186, 208, 218, 242, 251, 262, 267, 271, 290, 296 and 304]</p>							



						Network Rail are keen to work with the Council to ensure that the Local Plan delivers on its aims whilst also ensuring that new development and other sources of funding provide for improved facilities and access for all users to the rail network.	
526	Jon Rowles	Policy 47 Sustainable Travel Choices (Strategic Policy) (Local Implementation Plan for Transport)				- The Opportunity Areas in Hounslow and Kingston Upon Thames will result in more traffic in Richmond. In the Hounslow Transport Local Implementation Plan it identifies the need to rebuild or widen several railway bridges in Whitton to accommodate the growth in cyclists; however, this identified need has not worked its way into Richmond's Transport LIP. Turning to Kingston, TFL commissioned ARUP to undertake a transport analysis which found there would be a significant increase in traffic which would need to be mitigated with better cycling links and possible local road charging.	
527	Nikki Nicholson, Surrey County Council	Policy 47 Sustainable Travel Choices (Strategic Policy)				<b>Highways and Transport</b> Where there are likely to be cross boundary impacts of development proposals in the Richmond Local Plan on Surrey's transport network, we consider that these impacts would need to be assessed and appropriate measures identified to resolve them. We would also add that where development in Richmond impacts Surrey's infrastructure and requires mitigation measures, this must be implemented and funded by developers.	
528	Suzanne Parkes, Elmbridge Borough Council	Policy 47 Sustainable Travel Choices (Strategic Policy)				<b>Policy 47 – Sustainable travel choices</b> EBC's supports this policy which seeks to locate development closer to the public transport network, encouraging active travel and making accessibility easier in Richmond. This approach has many synergies to that taken in the Elmbridge draft Local Plan (June 2022). EBC notes however, that the Strategic Transport Modelling was published in December 2017 as part of the London Plan evidence base. This document sets out the strategic modelling that was carried out to assess the effectiveness of the draft MTS scenario in accommodating new London Plan growth projections, with an increase in sustainable, active, and efficient travel. As discussed at the Duty to Cooperate meetings on 10 and 13 July 2023, EBC has concerns that a Transport Assessment has not been completed in support of the LBRT Publication Local Plan (Regulation 19) document which identifies whether there is any potential cross boundary or cumulative impacts on the road network outside of your borough. It is understood however, that a Topic Paper to address these concerns will be published and shared prior to the submission of your Local Plan. EBC welcomes further engagement on this issues.	
529	Tim Catchpole, Mortlake with East Sheen Society	Policy 47 Sustainable Travel Choices (Strategic Policy)				<b>Theme: Reducing the need to travel and improving the choices for more sustainable travel (Policies 47-48)</b> <b>Policy 47. Sustainable travel choices</b> [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments – comment 1044 in relation to Policy 47] We note your reference to the TfL modelling. Our concern is that it seems to be shrouded in secrecy. The roads through our area appear to be carrying much extraneous traffic on orbital journeys because the same orbital movement of public transport is clearly inadequate. When did TfL last undertake an O&D survey on the South Circular Road in our area? And does their model take note of this? We note your comment about possible highway safety issues around Mortlake Station and the need for a financial contribution from developers towards improvements. The proposed improvements are cosmetic. We have just recently heard Network Rail's announcement about installing lifts at Barnes Station despite there being no major developments in that area, but they have no such plans for either Mortlake Station (next to the Sheen Lane level crossing) nor North Sheen Station (next to the Manor Road level crossing) where developments are proposed respectively on the Brewery and Homebase sites. Why is this? We also note your response to our comment about motorists making long journeys to get fuel and we are pleased to see that you have inserted a new paragraph to cover this point.	
530	Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common	Policy 47 Sustainable Travel Choices (Strategic Policy)				<b>b. Reasons for the proposed amendments</b> In the wider area, there has been extensive development just north of Kew bridge, along the western corridor. In the East of the Borough, Hammersmith Bridge was closed in April 2019, and Sheen Gate, Richmond Park in March 2020. Mortlake, East Sheen, Barnes, and Kew contain a corridor hugely constrained by the river Thames, the railway and Richmond Park giving rise to regular and serious levels of traffic congestion causing both gridlock and safety risks at strategic junctions and hotspots such as the four level crossings at Mortlake Station, Manor Road, White Hart Lane and Vine Road and Chalker's Corner on the A316. The area is not Central nor Inner London and lies outside an Outer London town centre, with poor public transport accessibility. There remain major uncertainties over the future of Hammersmith Bridge and rail and bus service levels in the locality, some of which have recently been reduced. However, there is unprecedented levels of development in the East of the Borough identified in the local plan site allocations at Homebase (29), Kew (31), STAG (35), and Barnes Hospital (38). Cumulatively, these sites are destined to add at least an additional 3,000 homes and more than 6,000 people living and working in the area, together with a new 1200 secondary school, 90 pupil special needs school and hospital. All this will create a significant additional burden on the transport infrastructure in Richmond and the neighbouring boroughs of Wandsworth and Hounslow in particular. The evidence for Richmond's Transport strategy is taken from Local Implementation Plan 3, which is based on evidence gathered in 2018, more than five years ago, before the closure of Hammersmith Bridge and Sheen Gate, Richmond Park and the change in travel patterns post the pandemic. The recent Urban Design study (2023) recommended the	<b>1. Section 23. Reducing the need to travel and improving the choices for more sustainable travel</b> <b>a. Local Plan proposed amendments</b> Section 23 is included in pages 278-289 of the Local Plan. I have set out below extracts from this text, with suggested amendments highlighted in yellow and highlighted policy areas which are most relevant. <b>'Policy 47. Sustainable travel choices (Strategic Policy)</b> A. The Council will work with others to bring about safe, sustainable, accessible transport solutions to reduce traffic congestion, reduce air pollution, including carbon dioxide emissions, improve public health, and improve access to services and employment in accordance with the policies set out in the London Plan, Mayor's Transport Strategy, and the Council's own Active Travel Strategy. Planning applicants will therefore be expected to: <b>Location of the development</b> B. Propose major developments (see Table 1 for a definition) in areas that either already have a <b>Public Transport Accessibility Level of 4-6 or if not mitigate the impact of their development on the existing passenger transport network in accordance with Para. 110d of the National Planning Policy Framework (NPPF)</b> . Depending on the impact of the development relative to the capacity of the bus and rail network in its final assessment year,

					<p>transport and social infrastructure in the East of the Borough needed to be reviewed, however this was not carried out. The 38 Transport priorities agreed by the Transport committee in November 2022 also made no reference to the Transport Infrastructure changes that might be needed in the East of the Borough to accommodate the developments, despite this being raised in the September 2022 meeting as a ward Concern. The infrastructure delivery plan, which is based on LIP 3, also makes no reference to the developments.</p> <p>In July '23, over 1,400 residents signed a petition asking for a review to take place, given the concerns over transport and the lack of evidence that the impact of the cumulative effect of the developments on the transport infrastructure had been considered, with or without neighbouring boroughs. A request for a review was also served as a petition on 6 July at the GLA, asking them to work with Richmond Council to consider this, as a matter of urgency, as three of the development sites had been granted planning permission in Richmond.</p> <p>This area is not designated as an Opportunity or Growth Area by the Mayor and is therefore not included at London Level for transport infrastructure improvements. Furthermore, this area will not benefit from Crossrail 2, the Elizabeth line, the Bakerloo line extension or the west London orbital.</p> <p>Developers own transport assessments, have not considered the cumulative impact of the developments as required by London Policy D2 and T4, but have instead concluded that their individual schemes have little impact on the transport network and therefore require little/no mitigation by way of improvements to the transport infrastructure.</p> <p>Because the LIP3 transport strategy providing evidence for the infrastructure delivery plan is more than 5 years old and does not refer to any of the developments in the East of the Borough, there is no evidence that the cumulative, impact of the developments can be accommodated within our existing current transport infrastructure.</p> <p><b>In line with NPPF Policy 33, Transport evidence in the LIP should be updated, so that the transport strategy is based on accurate and realistic cumulative transport forecasts from all proposed developments and advice from experts on the optimum way to mitigate these pressures. This has not been done adequately during the planning or local plan process to date in breach of the policies set out below.</b></p> <p>Further, in line with the NPPF 22, and London Policy D2, the Local plan should be updated to explicitly state that in future, the cumulative impact of all site allocations anticipated in the plan, which have either received planning, are being assessed or have had discussions with the planning officers should be taken into consideration as completed developments when the cumulative impact on the area is being assessed over the next 15 years, in line with the requirement for forward strategic planning, and where the development is large enough, 30 years.</p> <p>It is likely that the infrastructure changes have not been properly considered because the size of the unprecedented development in the East of the Borough is set out incorrectly in the Local Plan (see Housing below). However, when this was highlighted through the proper channels to officers and members over the last 15 months, rather than engaging on this and trying to resolve the issues, requests have been ignored and detailed written comments on the plan have all been rebutted, in breach of the local plan policy's commitment to work in partnership with communities.</p> <p><b>I would ask the inspector to consider, if the Transport Strategy, based on evidence over 5 years old, is sound and should be reviewed.</b></p> <p><b>c. Relevant Policies and other evidence</b></p> <table border="1" data-bbox="795 1165 1736 1879"> <tr> <td data-bbox="795 1165 1044 1879"> <p><b>National Planning Policy (NPPF) Framework 2021 – Plan making and delivery</b></p> </td> <td data-bbox="1044 1165 1736 1879"> <p><b>Strategic policies</b></p> <p><b>20.</b> Strategic policies should .. make sufficient provision for.. b) infrastructure for transport ...</p> <p><b>22.</b> Strategic policies should look ahead over a minimum <b>15 year period</b> from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. <b>Where larger scale</b> developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.</p> <p><b>Preparing and reviewing plans</b></p> <p><b>31.</b> The preparation and review of all policies should be underpinned by relevant and <b>up-to-date evidence.</b></p> <p><b>33.</b> Policies in local plans ..should be <b>updated at least once every five years</b> ..and should take into account changing circumstances affecting the area, or any relevant changes in national policy.</p> <p><b>Examining Plans</b></p> <p><b>35.</b> ...Plans are 'sound' if:</p> <p>a) <b>Positively prepared</b> – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities</p> <p>b) <b>Justified</b> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) <b>Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters..</p> </td> </tr> </table>	<p><b>National Planning Policy (NPPF) Framework 2021 – Plan making and delivery</b></p>	<p><b>Strategic policies</b></p> <p><b>20.</b> Strategic policies should .. make sufficient provision for.. b) infrastructure for transport ...</p> <p><b>22.</b> Strategic policies should look ahead over a minimum <b>15 year period</b> from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. <b>Where larger scale</b> developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.</p> <p><b>Preparing and reviewing plans</b></p> <p><b>31.</b> The preparation and review of all policies should be underpinned by relevant and <b>up-to-date evidence.</b></p> <p><b>33.</b> Policies in local plans ..should be <b>updated at least once every five years</b> ..and should take into account changing circumstances affecting the area, or any relevant changes in national policy.</p> <p><b>Examining Plans</b></p> <p><b>35.</b> ...Plans are 'sound' if:</p> <p>a) <b>Positively prepared</b> – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities</p> <p>b) <b>Justified</b> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) <b>Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters..</p>	<p>this may include applicants making financial contributions to increase capacity and/or improve infrastructure on the passenger transport network....</p> <p><b>Assessing the impact of developments</b></p> <p>E. Demonstrate that their <b>proposed developments do not have a severe impact on the operation, safety, or accessibility of the local or strategic road network.</b> Any impact on the local or strategic road network, including the impact of occupants parking vehicles on the carriageway, will need to be mitigated in accordance with para. 110d of the NPPF.</p> <p>F. All planning applications for major developments will need to include a full transport assessment and travel plan which must be completed in accordance with Transport for London (TfL) guidance. Applications for smaller developments must include a transport statement and travel plan statement, also completed in accordance with TfL guidance (see Table 23.1). Applications under a certain size will be expected to include a chapter about transport and accessibility in their Design and Access Statement</p> <p>23.2 The Council has a <b>Local Implementation Plan (LIP 3) adopted in 2019</b> detailing its vision for how the transport network will be transformed over the next 20 years. It includes a headline target for 75% of trips to be by sustainable modes (walking, cycling and public transport) by 2041, from a baseline of 61%. The plan also includes targets for expanding the cycle network, improving air quality, reducing road danger and increasing the use of public transport.</p> <p>23.4 Developments that will generate a large volume of trips should be focused in areas with high Public Transport Accessibility Levels (PTALs) to help create the most sustainable transport environment</p> <p>23.14 .. Reference should be made to the priorities identified in the Local Implementation Plan.</p> <p>23.16 All planning applications will be required to demonstrate that their proposed developments do not have a severe impact on the operation, safety, or accessibility of the local or strategic road network. <b>The cumulative impact of all site allocations anticipated in the plan, which have either received planning, are being assessed or have had discussions with the planning officers should be taken into consideration as completed developments when the cumulative impact on the area is being assessed over a forecast 15 or 30 year period, as required by the NPPF.</b></p> <p>23.24 <b>Delivery of transport infrastructure</b>, including the relevant proposed transport schemes as set out in the London Plan, is <b>critical to the delivery of the strategic objectives of the Local Plan'</b></p>
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							delivered, or that existing facilities are surplus to requirements. This will take into account the need for additional space to accommodate alternative fuel facilities.	confirmed by Transport for London, that it is operationally no longer needed or enhanced reprovision has been made as part of the redevelopment of the site or elsewhere in a convenient and accessible alternative'						
537	Sammantha Rose, <b>National Highways</b>	Delivery of transport infrastructure - Paragraph 23.24					<p><u>Other general points</u></p> <p>On Page 343 of the Draft Local Plan, Paragraph 23.24 states that '<i>delivery of transport infrastructure, including the relevant proposed transport schemes as set out in the London Plan, is critical to the delivery of the strategic objectives of the Local Plan. Planning, through the use of developers' contributions such as through the use of planning obligations (including Section 106 and Community Infrastructure Levy) is a key way that the Council can gain the necessary resources to assist in the delivery of this vital infrastructure.</i></p> <p>It should be noted that National Highways cannot be a party to Section 106 contributions. Likewise, it should not be presumed that any necessary SRN infrastructure will be funded through a future Road Investment Strategy (RIS), nor can mitigation requirements affecting the SRN be included within the Community Infrastructure Levy at a planning application stage.</p>							
538	Elena <b>Mikhaylova</b>	Policy 47 Sustainable Travel Choices (Strategic Policy)	No	N	N	Positively Prepared; Effective; Justified; Consistent with national policy	<p>This policy is undemocratic and breaches our human rights. If the Council goes ahead with limiting usage of cars in the Borough, legal actions will be taken against each person who is looking to implement this policy. Furthermore, this policy is in breach of the Equality and Disabilities act. It is absolutely insane that the Council is looking to discriminate parents, children, disabled people and those who simply do not want to cycle by shutting roads to cars and offering them "benches to rest". It appears that the Council has either received bribes from the organisations that are currently looking to limit car usage which is a breach of fundamental human rights or it has been impacted by undemocratic lobbying by "cycling clubs" who, in turn, are funded by those corporations, or both.</p>			All policies mentioned in my comments above must be cancelled immediately.				
-							<b>Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management</b>							
539	John Sadler, <b>CPRE London</b>	Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management		N	o	Justified; Consistent with national policy	<p><b>Car free development</b></p> <p>Site allocations should not be specifying minimum levels of car parking as this is in conflict with the London Plan. For example, Site Allocation 8 The Steathmore Centre.</p> <p>We support proposals to restrict conversion of front gardens for parking – but believe this should be extended to promote the reinstatement of front gardens. Policies could ensure bus lanes, cycle lanes and safe/even pavements are given priority over enabling front garden parking.</p>							
540	Richard Carr, <b>Transport for London (TfL)</b>	Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management					<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Policy 48. Vehicular Parking standards, Cycle Parking, Servicing and Construction Logistics Management</td> <td> <p>We strongly support the requirement to provide cycle and vehicle parking in line with London Plan policies and standards, including reference to London Cycling Design Standards. Where parking is provided, a Parking Design and Management Plan should be submitted with the application. In part F we welcome the encouragement of car free developments in PTAL 3 or above.</p> <p>In F5, where CPZs are not already in place it would be appropriate to encourage developments to provide funding towards implementation of a new or extended CPZ (or equivalent parking controls).</p> <p>In F8, it may not be appropriate to require car club spaces to be provided in developments in areas of very good connectivity where alternatives to car use can provide for all travel needs.</p> <p>In part G, there may be a need to consider on street disabled persons' parking spaces on constrained sites that are otherwise suitable for car free</p> </td> <td> <p>TfL guidance on Parking Design and Management Plans is due to be issued for consultation and so a requirement should be added to the policy or accompanying text to require submission of a Parking Design and Management Plan where parking is provided.</p> <p>In F5 we welcome additional wording which states that 'In certain cases, where a development is forecast significant impact on on-street parking stress in an area, mitigation may be sought in the form of financial contributions towards the cost of reviewing and changing an existing CPZ or implementing a new one.</p> <p>We note that no changes have been made to F8</p> <p>We note that no changes have been made to part G</p> <p>In part H we welcome reference to provision of on street cycle parking where</p> </td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Policy 48. Vehicular Parking standards, Cycle Parking, Servicing and Construction Logistics Management	<p>We strongly support the requirement to provide cycle and vehicle parking in line with London Plan policies and standards, including reference to London Cycling Design Standards. Where parking is provided, a Parking Design and Management Plan should be submitted with the application. In part F we welcome the encouragement of car free developments in PTAL 3 or above.</p> <p>In F5, where CPZs are not already in place it would be appropriate to encourage developments to provide funding towards implementation of a new or extended CPZ (or equivalent parking controls).</p> <p>In F8, it may not be appropriate to require car club spaces to be provided in developments in areas of very good connectivity where alternatives to car use can provide for all travel needs.</p> <p>In part G, there may be a need to consider on street disabled persons' parking spaces on constrained sites that are otherwise suitable for car free</p>	<p>TfL guidance on Parking Design and Management Plans is due to be issued for consultation and so a requirement should be added to the policy or accompanying text to require submission of a Parking Design and Management Plan where parking is provided.</p> <p>In F5 we welcome additional wording which states that 'In certain cases, where a development is forecast significant impact on on-street parking stress in an area, mitigation may be sought in the form of financial contributions towards the cost of reviewing and changing an existing CPZ or implementing a new one.</p> <p>We note that no changes have been made to F8</p> <p>We note that no changes have been made to part G</p> <p>In part H we welcome reference to provision of on street cycle parking where</p>	
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							development. We can provide advice on how this works in other boroughs if helpful. In part H, where there is physically no possibility of accommodating short stay cycle parking on site, on street provision may need to be considered as set out in paragraph 23.35. In part I, it may not be appropriate to require car club spaces to be provided in developments in areas of very good connectivity where alternatives to car use can provide for all travel needs. In part L, it is helpful to refer to TfL guidance on Delivery and Servicing Plans. In part M, to ensure consistency with London Plan and TfL, it would be helpful to refer to Construction Logistics Plans rather than Construction Traffic Management Plans.	short stay cycle parking cannot be accommodated on site  We note that no changes have been made to part I  In part L we welcome the addition of a reference to TfL guidance  In part M we welcome amended wording which now refers to Construction Logistics Plans	
541	Natasha Styles (The Planning Bureau Limited), <b>McCarthy &amp; Stone Retirement Lifestyles Ltd</b>	Policy 48 Vehicular Parking Standards		No		Justified; Consistent with national policy	Thank you for the opportunity to comment on the draft London Borough of Richmond Local Plan Publication Consultation, June 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK. The policy supports the parking standards set out in the London Plan whilst at point F suggests that car free developments may be appropriate in certain situations. The London Plan however promotes car free development in PTAL areas 4,5 and 6. The Council should note that whilst we can understand the rationale behind car free developments in accessible locations in general housing in London, we consider that a requirement for a car free development for critically needed specialist older persons' housing to be inappropriate and unnecessary given the policy requirement in London Plan policy GG1 for older people to 'be able to move around with ease'. Purpose built older person's housing has residents whose needs are substantially different to users of mainstream housing and therefore should be considered on its own case with respect to car parking. Residents of older persons housing, given their age, tend to be frail and are more likely to have mobility difficulties and in some cases in need of a car to move around with ease. They also tend to have frequent visits from carers who often need to drive and therefore an exemption to this policy of individual car parking standards for older persons housing should be considered. McCarthy Stone has undertaken research of existing developments that identifies that an average car parking provision of 0.55 spaces per apartment is needed to meet the parking needs of residents, carers, visitors and house managers. The policy should therefore exempt older persons housing schemes from providing car free developments.		<b>Recommendation</b> <b>Add to end of Policy 48 point F a new point 9 stating '<u>older person's housing schemes, due to the nature of some residents who will be reliant on private transport either for themselves or their carers, are exempt from providing car free developments</u>'.</b>
-	<b>Richard Mundy</b>	Bike shelters and car chargers	Yes	No	Yes	Effective	[See comment 316 in relation to bike shelters and car chargers in front of houses]		
-							<b>Securing new social and community infrastructure to support a growing population</b>		
542	Tim Catchpole, <b>Mortlake with East Sheen Society</b>	Securing new social and community infrastructure to support a growing population					<b>Theme: Securing new social and community infrastructure to support a growing population (Policies 49-50)</b> [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments – comments 1080 and 1088 in relation to these policies] No comments.		
-							<b>Policy 49 Social and Community Infrastructure (Strategic Policy)</b>		
543	Tom Clarke, <b>Theatres Trust</b>	Policy 49 Social and Community Infrastructure (Strategic Policy)	Yes	Yes	Yes		Theatres Trust supports this policy and the protection it provides to existing facilities to guard against loss, in line with paragraph 93 of the NPPF (2021).		
544	Jo Edwards, <b>Sport England</b>	Policy 49 Social and Community Infrastructure (Strategic Policy)					Sport England supports this policy. Appendix 2 marketing requirements should expressly exclude sport and recreation facilities that are to be assessed against the Council's evidence base for sport and the NPPF (para 24.13).		

-	Nirali Vekaria (Lichfields), West London NHS Trust	Policy 49, Paragraph E, page 349	Yes	No	Yes	Justified; Effective	[See comment 238 on Site Allocation 24 Cassel Hospital in regard of reprovion of social or community uses, the marketing period, and requirements for affordable housing]			
-	Nick Dexter, Whitton Community Association	Policy 49 Social and Community Infrastructure (Strategic Policy)					[See comment 229 on Site Allocation 22 and the affordable housing option]			
545	Mark Jopling, Udney Park Playing Fields Trust	Paragraph 24.19					<b>Asset of Community Value (ACV)</b> The Trust welcomes the renewal of the ACV status of Udney Park after the change of ownership in 2022. It is proposed to delete the word "likely" in paragraph 24.19 of the draft Local Plan, ACV is by law a material consideration in Planning for change of use .			
-							<b>Policy 50 Education and Training (Strategic Policy)</b>			
546	John Sadler, CPRE London	Policy 50 Education and Training (Strategic Policy)					In working with others to identify sites, it should be explicitly stated that such searches should not include protected or other green sites or other important green infrastructure. We suggest the borough commissions an independent sequential site search for new primary, secondary and special schools. This could lead to safeguarding of sites in each category.			
547	Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common	Policy 50 Education and Training (Strategic Policy)					<p><b>b. Reasons for the proposed amendments</b></p> <p>Part A of the S3 London Plan Policy requires the Local Authority to liaise with neighbouring boroughs when planning education provision, under NPPF policy 26. The need for cross-boundary co-operation has been further strengthened by the appointment last year of a new London wide Regional Schools Commissioner and is particularly important in light of falling rolls across the capital. There can be no justification to delete this obligation, as currently drafted. The proposal to delete Part A was a result of the reluctance of the school's place planning officer to include in his pupil capacity calculations, available secondary school capacity outside the borough, but within 3 miles of the STAG site. The proposal to include Part A is in line with national policy, and also supports effective cross-boundary working and the duty to co-operate.</p> <p>There is cross-party agreement to enhance this policy so that developers and other council contractors employ and/or train residents. However, my preference is to further strengthen these provisions:</p> <ul style="list-style-type: none"> <li>• To cover the council itself – as they are a large local employer, who can significantly contribute to upskilling and employing the local workforce.</li> <li>• Reducing the development threshold from 50 to 10 units, as many of the Richmond developments will be smaller, infill sites.</li> <li>• Not giving developers the opportunity to easily avoid these provisions, by claiming specialist skills are required by allowing this only in 'exceptional' circumstances. Disney did this when applying to operate on the STAG site, despite the fact that Richmond has a large, historic film production base in the borough and many colleges with relevant courses in the surrounding area.</li> </ul> <p>This change is in line with national policy and supports whole plan delivery.</p> <p><b>c. Relevant Policies and other evidence</b></p> <table border="1"> <tr> <td><b>National Planning Policy (NPPF) Framework 2021 – Plan making and delivery</b></td> <td> <p><b>Strategic policies</b></p> <p><b>20. Strategic policies should .. make sufficient provision for, employment .. education ..</b></p> <p><b>22. 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The Council will work with partners to encourage the provision of facilities and services for education and training of all age groups to help reduce inequalities and support the local economy, by the following means:</p> <ol style="list-style-type: none"> <li>1. supporting the provision of facilities to meet the needs for primary and secondary school places as well as pre-school, childcare and other education and training facilities, <b>based on a needs assessment including an audit of existing facilities, locally and sub-regionally, addressing cross-boundary issues, in line with NPPF policy no.31 and London Policy S3, Part A;</b></li> <li>2. safeguarding land and buildings in educational use;</li> <li>3. identifying new sites for educational uses as part of this Plan, <b>particularly in areas with significant planned growth or need for specialist places (e.g.. alternative provision, further education including non-selective provision, or special needs);</b> the Council will work with landowners and developers to secure sites for pre-schools, primary and secondary schools as well as sixth forms to ensure sufficient spaces can be provided for children aged 2-18;</li> <li>4. encouraging the potential to maximise existing educational sites through extensions, redevelopment or refurbishment to meet identified educational needs;</li> <li>5. encouraging flexible and adaptable buildings, multi-use and co-location with other social infrastructure.</li> </ol> <p>B. Early engagement is required with the Council (Achieving for Children) where there is a loss or proposed gain in pre-school, primary and secondary places; evidence of discussions between the Council (Achieving for Children) and providers will be required to demonstrate how needs will be met and should be submitted with an application.</p> <p>C. Proposals for education and childcare facilities will be considered against the criteria set out in London Plan Policy S3 Education and childcare facilities <b>parts B and C.</b></p> <p>D. The Council will promote local employment opportunities and training programmes in accordance with London Plan Policy E11 Skills and opportunities for all and seek opportunities to support local procurement of goods and services. Where the employment opportunities generated by construction as well as the end use of the development create more than 20 (Full Time Equivalent) jobs, a Local Employment Agreement, secured through a Section 106 agreement, will be required. This will secure employment, training/skills development opportunities for local people. If it is accepted it is not possible to deliver this through the development, developers will be required to make a financial contribution to support local employment, education, and skills initiatives.</p> <p>...</p> <p>24.39 Consequently, on all development proposals generating 20 FTE (,,) jobs or more .. the council will require a Local Employment Agreement <b>...The same obligation to employ locally</b></p>
<b>National Planning Policy (NPPF) Framework 2021 – Plan making and delivery</b>	<p><b>Strategic policies</b></p> <p><b>20. Strategic policies should .. make sufficient provision for, employment .. education ..</b></p> <p><b>22. Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.</b> Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.</p> <p><b>26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.</b></p> <p><b>Preparing and reviewing plans</b></p> <p><b>31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.</b></p>									

						<p><b>33.</b> Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy.</p> <p><b>Development contributions</b></p> <p><b>34.</b> Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.</p> <p><b>Examining Plans</b></p> <p><b>35.</b> ...Plans are 'sound' if:</p> <p>a) <b>Positively prepared</b> – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs<sup>21</sup>; and is informed by agreements with other authorities</p> <p>b) <b>Justified</b> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) <b>Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters..</p> <p>d) <b>Consistent with national policy</b> – enabling the delivery of sustainable development ..</p>	<p><i>and develop apprenticeships within all business areas, is also placed on the council itself, and its performance will be included in the targets and monitoring process.</i></p> <p>24.40 ... The number of jobs generated by a development will vary depending on its scale, as well as the end use being proposed. The obligation set out in part B of the policy for an LEA between the developer and the Council will therefore apply to</p> <ul style="list-style-type: none"> <li>• All residential developments providing 10 units or more; and</li> <li>• All commercial developments consisting of 400 sqm or more of employment space.</li> </ul> <p>24.44 A developer can set out justification as to why it may not be possible to deliver any of the requirements highlighted, if there are <b>exceptional</b> circumstances specific to the scheme (e.g. specialised labour requirements from the end user) such that direct provision is not operationally feasible, or that an alternative means of delivery would result in a more effective outcome. There should be early engagement with the Council to discuss the specific circumstances of the scheme. If those circumstances are accepted by the Council, then financial contributions via Richmond Work Match towards local employment training schemes, job brokerage services or other business support initiatives will be required – related to the average cost to the Council of supporting and/or placing Richmond residents in jobs, training places and apprenticeships (an update to the Planning Obligations SPD will set out further details).</p>
						<p><b>London Policy S3, Part A</b></p> <p>S3 Part A – To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should:</p> <ol style="list-style-type: none"> <li>1) prepare Development Plans that are informed by a needs assessment of education and childcare facility needs. Needs should be assessed locally and sub-regionally, addressing cross-boundary issues. Needs assessments should include an audit of existing facilities;</li> <li>2) identify sites for future provision through the Development Plan process, particularly in areas with significant planned growth or need for school places (including Special Educational Needs and Disability places)</li> <li>3) ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need</li> </ol>	
-						<b>Creating safe, healthy and inclusive communities</b>	
548	Tim Catchpole, Mortlake with East Sheen Society					<p><b>Theme: Creating safe, healthy and inclusive communities (Policies 51-54)</b> [See the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments – comments 1091, 1099, 1102, and 1111 in relation to these policies] No comments on your responses.</p>	
-						<b>Policy 51 Health and Wellbeing (Strategic Policy)</b>	
549	Solomon Green	Creating safe, healthy and inclusive communities				<p>Under the Health section there was no room to draw attention to the lack of A &amp; E facilities within the borough and the difficulty of accessing those that designated for residents as a result of road closures and designated cycle routes (within both LBRC and neighbouring boroughs). This also applies to ambulances and other emergency vehicles. In particular the closure of Sheen Gate has added a significant number of minutes (upwards of 10 minutes) to the journey to any of the three or four hospitals currently in use.</p>	
550	Jo Edwards, Sport England	Policy 51 Health and Wellbeing (Strategic Policy)				<p>Sport England supports this policy that is consistent with Sport England's own Active Design guidance. We would recommend that a reference to that guidance that has been recently updated is included within the supporting text.</p>	
-						<b>Policy 52 Allotments and Food Growing Spaces</b>	

551	John Sadler, CPRE London	Policy 52 Allotments and Food Growing Spaces		No		Effective; Consistent with national policy	Only 9 of the 24 allotments are statutory – meaning the rest are ‘temporary’: we suggest these are all upgraded. Also, we would question that need is ‘fluctuating’ (as we understand it, the lists have been open and closed a number of times which might be leading to the appearance of fluctuations) and would recommend that a more permanent waiting list is established and advertised. Plots should not be divided when reallocated – most plots in Richmond were half plots (5 rods) but many are now just 2.5 rods which make them too small to adequately rotate crops.	
-							<b>Policy 53 Local Environmental Impacts</b>	
552	David Wilson, Thames Water	Policy 53 Local Environmental Impacts		No		Consistent with national policy	<p><b>Policy 53. Local Environmental Impacts - Development within the vicinity of Sewage Pumping Stations (and Sewage Works) Works</b></p> <p>The new Local Plan should assess impact of any development within the vicinity of sewage works and sewage pumping stations in line with the Agent of Change principle set out in the NPPF and Policy D13 of the London Plan 2021. Where development is being proposed within 800m of a sewage treatment works or 15m of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works/pumping station. Paragraph 174 of the NPPF, February 2021, sets out that: “Planning policies and decisions should contribute to and enhance the natural and local environment by: ...e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans...” Paragraph 185 goes on to state: “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development....”</p> <p>The online PPG states at Paragraph: 005 Reference ID: 34-005-20140306 that: “Plan-making may need to consider: ....whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern)..”</p> <p>The odour impact study would establish whether new resident’s amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer.</p> <p>The Council state that Thames Water would be a statutory consultee as part of the planning application process for major applications. This should be clarified as Thames Water and the Water companies are not statutory consultees (other than for fracking planning applications).</p>	Make reference to proposed within 800m of a sewage treatment works or 15m of a sewage pumping station and need to review requirement for an odour study. Text similar to the following should be incorporated into the Policy: “When considering sensitive development, such as residential uses, close to a Sewage Pumping Station or Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.”
553	Peter Thompson, National Physical Laboratory (NPL)	Policy 53 Local Environmental Impacts	Yes	Yes	Yes		It is well reported that NPL undertakes research and programmes of work into air quality as well as greenhouse gas emissions measurement <a href="https://www.npl.co.uk/greenhouse-gas-emissions-measurement-modelling">https://www.npl.co.uk/greenhouse-gas-emissions-measurement-modelling</a> . <b>Policy 53</b> with a focus on air quality for the borough is an area of work that NPL could input into to ensure the borough can achieve its targets.	
554	Rachel Holmes, Environment Agency	Policy 53 Local Environmental Impacts					<p><b>4. Land Contamination</b></p> <p>Part M of Policy 53. Local Environmental impacts</p> <p>We welcome the inclusion of text to emphasise the risk of new development to water quality and request appropriate mitigation where required. Groundwater is constantly moving and once contaminated it can take a very long time to recover if at all. Therefore, the overarching approach to groundwater protection needs to be considered at the strategic planning stage.</p> <p>In our Reg 18 response we recommended stronger and more clearer wording to clarify what is required both in terms of assessment and suitability when it comes to any proposed development. We acknowledge that there are requirements in the supporting text regarding details of required assessment and mitigation and welcome this as it mirrors what is required within the National Planning Policy Framework.</p> <p><b>5. Waste</b></p> <p>Part I of Policy 53. Local Environmental impacts</p> <p>We requested amended to include additional detail on developer’s requirements and for any waste sites specifically to be mentioned. In response it was not considered necessary to specifically mention waste sites, with regards to applicant’s requirements for new developments near these sites, as this is covered within ‘nuisance-generating uses’ and would be subject to the agent of change principle.</p> <p>Although we agree that Part C of Policy 53 somewhat address this issue, we would still recommend further detail on specific development requirements. This would ensure consistency with each application and establish a baseline for what each developer is required to consider so they can ensure that it is considered as earliest as possible in their design process to maximise opportunities to minimise environmental impacts.</p>	
-							<b>Policy 54 Basements and Subterranean Developments</b>	
-							<b>Policy 55 Delivery and Monitoring</b>	

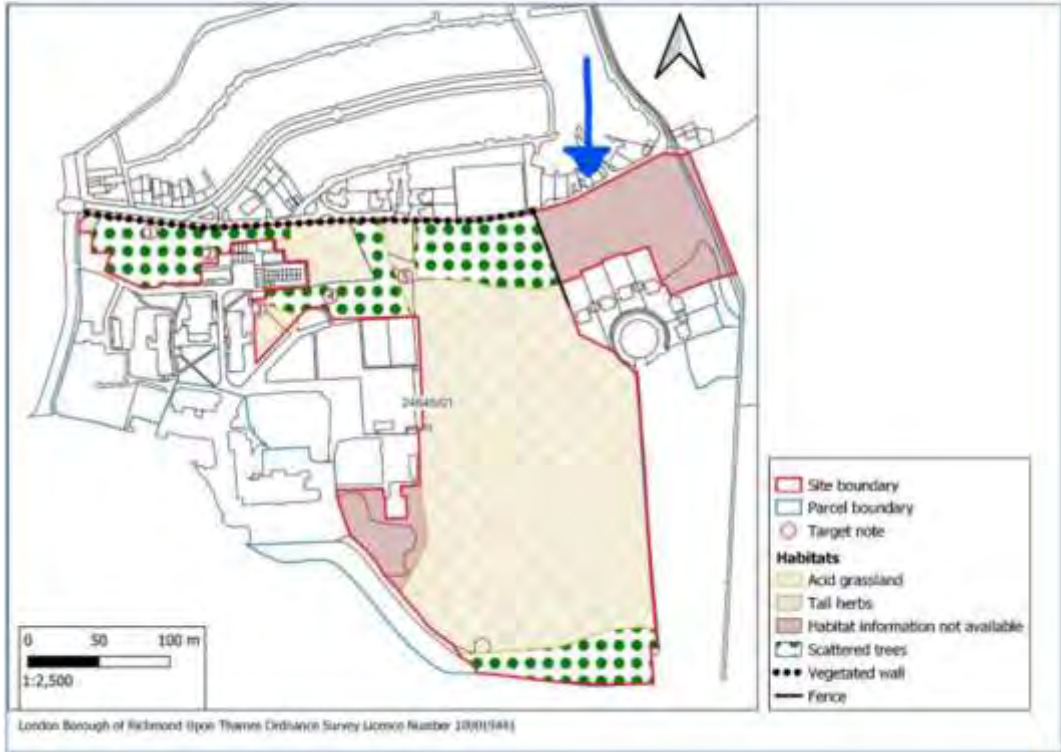


555	Andrew Hunt, HUDU in consultation with South West London Integrated Care Board	LP55 Delivery and Monitoring						<p>We would like to thank the Council for the opportunity to comment at this Reg 19 consultation stage of their Local Plan Review.</p> <p>We have formulated this response in consultation with NHS South West London's Integrated Care Board (ICB). HUDU recognises that Richmond Council has incorporated many of the changes that HUDU recommended at the Reg 18 stage of their Local Plan Review, which we welcome. We also welcome the reference made by the Council to social infrastructure in the supporting text of draft Policy 55: 'Delivery and Monitoring', however, we reiterate our previous suggestion that a direct reference to health or social infrastructure should be included into the policy criterion itself. This will strengthen the policy as a whole and provide further clarity to developers.</p> <p>HUDU would also like to note that, following discussion with the ICB, we are intending to comment separately on Richmond's Infrastructure Delivery Plan and future Infrastructure Delivery Schedule in due course.</p> <p>South West London's ICB and HUDU look forward to ongoing engagement with the Council as the Local Plan progresses.</p>	
556	Jon Rowles	Policy 55 Delivery and Monitoring						<p>- Monitoring: currently the Housing Committee receives an annual report of housing built, however, it is of very limited value because they are not in charge of the planning function and thus corrective actions cannot be put in place easily if the targets are not being met. Over the past five years, there appears to have been no real monitoring of the other policies in the plan and thus we are seeing a drift away from plan-led development in LBRuT. I believe the council needs to monitor all the main policies in the plan and this needs to be discussed annually by the Environment Committee.</p>	
557	Mark Jopling, Udney Park Playing Fields Trust	Policy 55 Delivery and Monitoring						<p>Policy 55 on Enforcement and Maintenance is limited to "unauthorised development", this Policy should be extended to include a commitment by LBRUT to Enforcement of material breaches of planning protections and historic s106 commitments, failure to conserve heritage assets and failure to take reasonable attempts to prevent anti-social behaviour.</p>	
558	Katherine Drew, The Royal Parks	Policy 55 Delivery and monitoring						<p>In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again.</p> <p>[See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1113 in relation to the value of development to support the maintenance, management and protection of Parks]</p>	
559	Louise Fluker, The Richmond Society	Implementation of the Local Plan, Paragraph 26.5	Yes	No	Yes	Effective		<p>There is a disconnect in that it is not clear how this will apply to existing housing stock and existing buildings and there is no reference to retrofitting.</p>	Council will need to develop policies which relate to retrofitting whether insulation, heat systems or water collection
560	Peter Thompson, National Physical Laboratory (NPL)	Implementation, Delivery and Monitoring, Paragraph 26.5	Yes	Yes	Yes			<p>Likewise, for <b>Policy 26 Implementation, Delivery and Monitoring section 26.5</b> "Through responding to the climate emergency and taking action, infrastructure will be adapted to become more climate resilient to cope with drought and flooding, along with investment to build a low carbon society, particularly for energy, waste and water. There will be increasing use of low and zero carbon heat sources and decarbonisation of existing heat networks" NPL can also provide expertise and guidance to the council to ensure the borough meets the target of net zero carbon by 2043.</p>	
561	Sammantha Rose, National Highways	26.16 onwards concerning Infrastructure Delivery						<p>We would expect that any mitigation necessary to deliver strategic growth of the Local Plan for the SRN will be identified and included in the IDP. The DfT Circular states in Paragraph 34 that <i>'our engagement with plan-making will help inform the preparation of the local authority infrastructure delivery evidence base. From a transport perspective, this evidence should provide a means of demonstrating to the examining inspector, development industry and local communities that planned growth is deliverable, and that the funding, partners and relevant processes are in place to enable the delivery of infrastructure; or that there is a realistic prospect that longer term investment can be secured within the timescales envisaged'</i>.</p> <p>National Highways would like to better understand the current position of the Local Plan in terms of anticipated future traffic growth (associated with applications) impacting on the SRN, and any mitigation measures (with the IDP) identified to off-set these impacts.</p> <p>Paragraph 26.16 onwards concerning Infrastructure Delivery, refers to the provision of an IDP, but refers to more 'essential community infrastructure'. There is no mention of the SRN. If necessary, mitigation measures will be required if unacceptable road safety or severe congestion impacts are identified. These could, and preference should be given to, include relevant sustainable transport measures, or physical highway improvements as a last resort.</p> <p>It does not appear that National Highways have been listed as one of the key stakeholders on the development of the IDP. However, we would appreciate the opportunity to stay informed and review the progress of the IDP so as to ensure that any SRN impacts would be considered, and if necessary, mitigated.</p>	
562	Julie Scurr	Delivery through the planning process						<p>My last comment is how your proposals fit in with the actual planning process, and how much control you actually have to deliver these plans. The redevelopment of both the Homebase and the Watney Brewery sites show that you actually have no power to deliver your building proposals for the larger sites. Until you can recover your local planning powers I would question the point of your plans for the larger sites – nice to have, but likely to be overthrown by the Mayor of London.</p> <p>The above is all very cynical so maybe it's time for me to move 😞</p>	
563	Jon Rowles	Infrastructure Delivery Plan						<p>- The Richmond Local Infrastructure Delivery Plan looks like a draft document in places with a large number of estimated costs missing. This could result in schemes going through planning without the council having the ability to</p>	



						collect contributions towards infrastructure needed to support them. Such as the proposed foot and cycle bridge across the river between Ham and Twickenham.	
-	Zoe Chick, <b>River Thames Scheme</b>	Infrastructure Delivery Plan – flood defences				[See comment 335 in relation to Policy 8 and reference to the IDP]	
-	Julie Scurr	Infrastructure - policing				[See comments 2 and 239 in relation to policing]	
-	Jenny & Rod Linter	Policy 55 Delivery and monitoring		N o	Justified	[See comment 505 in relation to impact on local infrastructure]	
-	Tom Wignall (Avison Young), <b>National Gas</b>	Infrastructure - utilities				[See comment 423 in relation to gas distribution]	
-	Tom Wignall (Avison Young), <b>National Grid Electricity Transmission</b>	Infrastructure - utilities				[See comment 424 in relation to energy distribution]	
-	David Wilson, <b>Thames Water</b>	Infrastructure – water and sewage				[See comment 343 in relation to Policy 9 and water and wastewater/sewerage infrastructure]	
-	Solomon Green					[See comment 549 in relation to hospitals and emergency services]	
-						<b>Glossary</b>	
-	Matthew Pigott (Avison Young), <b>Star Land Realty</b>	Glossary				[See comment 374 in relation to including definition of care home accommodation]	
-						<b>Appendices</b>	
-						<b>Appendix 1 Maps of Proposed Town Centre Boundaries and Primary Shopping Areas, and Local Centre Boundaries</b>	
-						<b>Appendix 2 Marketing Requirements</b>	
564	Philip Villars, PMV Planning Limited on behalf of owner of <b>Arlington Works</b>	Appendix 2. Table 28.1 Marketing Requirements		N o		<p><u>Appendix 2 Marketing Requirements</u></p> <p>Table 28.1 in Appendix 2 states that a number of policies in the Local Plan require marketing evidence to be submitted for applications involving the loss of certain uses. The Plan’s minimum marketing requirement for the loss of industrial land is two years. The requirement for a two-year marketing period is not a reasonable timeframe and is inconsistent with the London plan.</p> <p>The supporting text to London Plan Policy E7 (paragraph 7.7.5) states the following:</p> <p><i>“Evidence to demonstrate ‘no reasonable prospect’ of Non-Designated Industrial Sites being used for industrial and related purposes should include:</i></p> <ul style="list-style-type: none"> <li><i>• evidence of vacancy and marketing with appropriate lease terms and at market rates suitable for the type, use and size (for at least 12 months”.</i></li> </ul> <p>12 months is a sufficient time period to establish whether there is a reasonable prospect of the site being occupied for the relevant employment use. Given that this period is considered acceptable in the London Plan, Table 28.1 in Appendix 2 should be amended to require a 12-month marketing period, in line with the London Plan. This will confirm that the Council is committed to positive and effective plan making.</p>	
565	Tim Humphries (Firstplan), <b>William Grant &amp; Sons Ltd</b>	Appendix 2 Marketing Requirements, Paragraphs 28.10 & 28.12				<p>[See also comment 410 on Policy 23]</p> <p>5.22 Similarly, this blanket restriction is echoed at Appendix 2 of the draft Local Plan, which outlines the Council’s proposed Marketing Requirements. At the start of the appendix Paragraph 28.1 set out that:</p> <p><b>“A number of policies in this Local Plan require marketing evidence to be submitted for applications involving the loss of certain uses in order to provide justification that those sites are no longer required for their existing uses”</b> (Our underlining)</p> <p>5.23 The requirements of offices are outlined at Paragraph 28.9; however, Paragraph 28.10 then goes on to state that:</p> <p><b>“Please note that provision of marketing will not be accepted as justification for an exception to policy; there should be no net loss of office floorspace”.</b></p> <p>5.24 It is not considered that this blanket protection is justified or in conformity with the London Plan for the reasons set out above.</p>	<p><b>Appendix 2 Paragraph 28.10</b></p> <p><i>“Please note that provision of marketing will not be accepted as justification for the net loss of office space on its own. It will need to be supported by evidence of demand and supply. <del>an exception to policy; there should be no net loss of office floorspace.”</del></i></p> <p><b>Paragraph 28.12</b></p> <p><i>Please note that provision of marketing will not be accepted as justification for an exception to policy; there should be no net loss of office floorspace.</i></p>
-	Gerard Manley (Firstplan),					[See comment 411 in relation to Policy 23 and paragraph 28.10]	

	<b>Baden Prop Limited</b>							
-	Jo Edwards, Sport England						[See comment 544 in relation to marketing requirements and sport and recreation facilities]	
-							<b>Appendix 3 Tall and Mid-Rise Building Zones</b>	
-							<i>Note comments on the St Clare (Hampton Hill) Mid-rise Zone have been collated against the Place based strategy for Hampton &amp; Hampton Hill to group with similar comments.</i>	
-							<i>Note comments on the Teddington Mid-rise Zone have been collated against the Place-based Strategy for Teddington &amp; Hampton Wick to group with similar comments.</i>	
-	Katie Sullivan	St Clare mid-rise zone		N	N	Positively Prepared; Justified	[See comment 90 in relation to the St Clare mid-rise zone]	
-	Alison Campbell	Teddington mid-rise zone				Effective; Justified	[See comment 144 in relation to the Teddington mid-rise zone]	
566	Heather Ayres	St Clare mid-rise zone		N	N	Positively Prepared; Justified	Pages 29-31 and 413-416 Policy no/name - Appendix 3 Tall and mid-rise building zones Place-based strategy page 29 and following... Place Based Strategy for Hampton and Hampton Hill Maps - St Clare (Hampton Hill): Mid-rise Building Zone Appropriate Height 5 Storeys (15m) In your Overall Strategy for Hampton Hill you state: 'Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance' and 'There is an opportunity to establish distinctive landmarks, without recourse to tall buildings' However Appendix 3 states ' St Clare (Hampton Hill) Appropriate Height 5 storeys'. The area around St Clare is 2 & 3 storey Victorian terraced streets. It is inconsistent with your strategy for Hampton Hill to allow tall or mid-rise buildings in Hampton Hill. A 5 storey building is not in keeping with the buildings in the local streets and would be an eye sore. It is not an appropriate height for St Clare Hampton Hill. [See also comment 89 in relation to the St Clare mid-rise zone]	The St Clare site development has not yet been passed by the Planning Committee. It is wrong and unjustified to include this Appendix which goes against a very large number of local residents who feel the height of 5 storeys will not 'conserve or enhance' the area of Hampton Hill before it has gone through the proper process of approval. There are many local and justified objections to this proposed development and I feel it is very unfair to the local people to add this into the local plan in the hope that people do not notice or do not have the time or technical knowledge to reply to make their views heard.
-	Gary Hagreen	St Clare mid-rise zone	No	N	N	Positively Prepared; Justified	[See comment 87 in relation to the St Clare mid-rise zone]	
-	Alison Barker	St Clare mid-rise zone		N	N	Positively Prepared; Justified	[See comment 88 in relation to the St Clare mid-rise zone]	
-	Gerard Manley (Firstplan), Baden Prop Limited	Richmond Station					[See comment 250 in relation to Westminster House]	
-	Peter Willan and Paul Velluet, Old Deer Park Working Group	High rise development					[See comment 519 in respect of Policy 45 and high rise development which refer to Richmond Station]	
-	Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green)	High rise development					[See comment 518 in respect of Policy 45]	
-							<b>Appendix 4: Review of Sites of Importance for Nature Conservation</b>	
567	Prabhat Kumar	Appendix 4 – Sites of Importance for Nature Conservation (SINC) - RiB25		N		Effective; Justified	We have concerns about the potential impact of upgrading Ham Common West to a SINC (site of importance for nature conservation) of borough wide significance. The west side of Ham Common has traditionally been used for recreational activity, most of it informal. It is used for every form of recreation; from kite flying to rounders and football to children's parties, along with dog walkers. It is not clear what changes to the management of Ham Common west side this change may bring but assume some will be made as a result of the change.	Ham Common should remain as is for use by all. There is no need to modify the current set up of the common as it will have an impact on the quality of life for all those that use it.

		Ham Common west					It is important that the area is retained for primarily recreational use. Ham Common has particularly poor soil and we have noticed an increased degradation of the cricket outfield, on the east side of the Common, with the increased use by local people in recent years. We expect this increase to continue in the coming years and are concerned that, if recreational use on the west is made less attractive, then even more will use the east side further increasing the turf degradation. Please can these concerns be central to any change in designation of Ham Common West side.	
568	Emma Penson (DWD), Dukes Education Group and Radnor House School	Appendix 4 – Sites of Importance for Nature Conservation (SINC) – Kneller Hall	No	No	No	Positively Prepared; Justified; Effective; Consistent with national policy	<p><a href="#">Representations to Appendix 4 – Sites of Importance for Nature Conservation (SINC)</a></p> <p>Following work undertaken by Salix Ecology, 6.73 ha of land at Kneller Hall is proposed to be allocated as Borough Grade SINC. This is approximately 69% of the Site.</p> <p>Salix Ecology’s Review of Sites of Importance for Nature Conservation in Richmond upon Thames Volume 1: Report (November 2021) lists Kneller Hall as an additional site recommended for survey. 2.48 hectares of land is recommended for this survey at the Site. In Salix Ecology’s November 2022 update to their report (Volume 1), Kneller Hall is recommended to be allocated as a Borough Grade SINC, with the area increased to 6.7 hectares. In Volume 2 (November 2022) on page 18 a site plan of Kneller Hall is shown. However, this includes an area of land which is fenced off from and not part of the Kneller Hall site. This land is also outside of our client’s ownership. We assume this land is included within the figure of 6.7 hectares. The extract from page 18 shows the relevant plan and marks with the blue arrow the land that does not form part of the Kneller Hall site i.e the land to the east of the fence.</p> <p><b>Kneller Hall</b></p>  <p>The SINC designation at Appendix 4 should be amended to reduce the land area to that which falls within the Kneller Hall site or the title of the allocation updated to reflect that it also covers land outside the Site. We also query the suitability of allocating the extent of land as suggested at the Site as a SINC, especially as two areas marked on the plan above appear to not have been inspected (Habitat information not available). Currently the proposed SINC allocation is not justified.</p> <p>Furthermore, we disagree with the statement on page 72 of Salix Ecology’s Volume 2 (November 2022) that states that “Much of the grassland at the site was classified as acid grassland. Although species poor, these areas have potential for enhancement with appropriate management. The largest area of acid grassland was within the disused playing fields to the south of the site.” The playing fields are not disused, they were used by the Royal Military School until they vacated the site in 2021. Since that time our client has been bringing forward their masterplan for the Site and they are now awaiting planning permission to enable them to deliver the masterplan. Once planning permission is secured our client intends to re-level and re-turf the pitches, to improve their quality for sports. This is supported by Sports England, the LBRuT draft wording of Site Allocation 21 and by local schools and community groups. As a result of the past and proposed retention of the sporting use the playing fields, we query the suitability of designating such an extensive part of the Site as SINC. Paragraph 98 and 99 of the NPPF protects playing fields and opportunities for sport and physical activity. The SINC designation is in conflict with the ongoing sporting use of the pitches.</p>	
-	David Wilson, Thames Water						[See comment 492 in relation to M085 Hampton Water Treatment Works and Reservoirs Nature Conservation Designation]	

-	Geoff Bond, <b>Ham &amp; Petersham Association &amp; Amenities Group</b>						[See comment 230 in relation to protection of sites in Ham]	
569	Katherine Drew, <b>The Royal Parks</b>	Review of Sites of Importance for Nature Conservation in Richmond upon Thames					In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again. [See Appendix 1, along with the <a href="#">Council's Statement of Consultation (June 2023)</a> Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1131 in relation to the review of SINCs and specific sites - M082 Richmond Park and Associated Areas, M084 Bushy Park and Home Park, and RiB06 Longford River in Richmond]	



All responses received to the Publication Draft Local Plan (Regulation 19)

[https://www.richmond.gov.uk/services/planning/planning\\_policy/local\\_plan/draft\\_local\\_plan/draft\\_local\\_plan\\_publication\\_version](https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/draft_local_plan/draft_local_plan_publication_version)

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**Appendices:**

1. Katherine Drew, **The Royal Parks**
2. David Wilson, **Thames Water**
3. Lucy Hale (Gerald Eve), **St Mary's University**
4. Luke Burroughs, **Transport Trading Limited Properties Limited (TTLP)**
5. Smruti Patel (Avison Young), **Avanton Richmond Developments LTD**
6. Mark Knibbs (Avison Young with input from Montagu Evans and Energist), **St George plc and Marks and Spencer**
7. Philip Villars, PMV Planning Limited on behalf of owner of **Arlington Works**
8. Tim Humphries (Firstplan), **William Grant & Sons Ltd**
9. Tom Wignall (Avison Young), **National Gas**
10. Tom Wignall (Avison Young), **National Grid Electricity Transmission**
11. Peter Willan and Paul Velluet, **Old Deer Park Working Group**
12. Peter Willan, Paul Velluet and Laurence Bain, **Prospect of Richmond** (and supported by the Friends of Richmond Green)
13. Vivien Harris, **Friends of Richmond Green**
14. David **Taylor**
15. Olivia Russell (CBRE), **Rugby Football Union (RFU)**
16. Rosalind Gall (Solve Planning) on behalf of Magda Wilson, **Chantry Securities Ltd**





THE  
**ROYAL  
PARKS**

Andrea Kitzberger-Smith  
Spatial Planning and Design Team Manager  
London Borough of Richmond  
Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ

4 February 2022

Dear Ms Kitzberger-Smith

**London Borough of Richmond Upon Thames – Local Plan Pre-Publication  
(Regulation 18) Consultation 10 December 2021 to 31 January 2022**

The Royal Parks is grateful for the opportunity to comment on the above proposals at this stage in the process.

Planning Overview

The Royal Parks acknowledges the inclusion of reference to the importance of Richmond Park and Bushy Park within the London Borough of Richmond upon Thames as set out within the Pre-Publication Draft Local Plan.

We note that the Royal Parks are highlighted within the document text in respect of: area context, place-based strategies, promoting jobs and local economy, views and vistas, green and blue infrastructure network, public open space, and biodiversity designations. The importance of the Parks in the context of these topic areas aligns with The Royal Parks' own objectives.

In addition to references in the supporting text, the Pre-Publication Draft Local Plan makes specific reference to The Royal Parks within a number of policies. Whilst this is acknowledged, we would like the London Borough of Richmond upon Thames to go further by including a stand-alone Royal Parks policy. We consider that the importance of the Parks - as demonstrated by relevant reference to them throughout the Draft Local Plan - would justify such an inclusion and The Royal Parks would be keen to work with the Council to achieve this.

The Royal Parks would also like to work with the Council to capture the value of development around the Parks, and for support in protecting, maintaining and enhancing these sites of key green infrastructure which represent a significant asset to the Borough. Both dense development directly on our Park boundaries and taller developments that impact on the sightline are potentially



detrimental to these listed landscapes and intrusive to our visitors. We would therefore like to see the Local Plan tie in with our own developing policy documents.

### **Draft Policy Review & Comments**

We have considered all the draft policies set out within the Plan and have detailed comments under specific topic and policy headings. These are set out below:

#### Place-based strategy for Teddington

This is particularly relevant as it refers directly to Bushy Park. Specifically, an employment site is proposed on the edge of Bushy Park and three incremental intensification zones overlap with the Park. Whilst we agree with the inclusion of Bushy Park within the vision for Teddington and Hampton Wick, we would encourage the inclusion of specific mention of Bushy Park within the policy for future development to ensure that it is specifically considered when improving and creating connections between open spaces. We would emphasise that we would like to be involved further on in the plan process to ensure that any development around the Park is carried out with due care and consideration for it.

#### Place-based strategy for Ham, Petersham & Richmond Park:

This development area includes Richmond Park, so it is particularly relevant to The Royal Parks. Whilst we welcome the inclusion of Richmond Park within the vision, noting that it will be protected, there is no specific mention of it in the policy. The Park could be specifically mentioned when noting the network of green spaces. Furthermore, we would like to be involved further on in the plan process to ensure that any development around Richmond Park is carried out with due care and consideration for it.

#### Policy 10 New Housing

We note that the Borough's ten-year housing target is 4,110 homes to be completed by 2029. The number of homes to be delivered within close proximity to Richmond Park is around 1,200 and around 1,000 within close proximity to Bushy Park. This would almost certainly result in an intensification of visitors to the Parks. Capturing some of the value of these developments, through S106 or CIL payments, would seem appropriate in this instance to help The Royal Parks ensure that the Parks can continue to cope with the resultant increase in visitor numbers and their increasing importance as open green space for residents of the Borough. It will be important for The Royal Parks to be



involved further on in the plan process to ensure that development is appropriate in the context of the Parks.

#### Policy 16 Small Sites

We note that the London Plan sets out a strategic priority to increase the rate of housing delivery from small sites but not at the expense of open space. However, there is potential for such small sites to be located close to the Royal Parks which could have an impact either individually or cumulatively on the Parks. We would like to see this addressed specifically in the Small Sites policy.

#### Policy 21 Protecting the Local Economy

Protection of the local economy is supported by The Royal Parks. However, any increase in numbers of workers in the area could increase footfall within both Richmond and Bushy Parks. We are keen to work with the Borough to ensure that the Parks are protected and any additional pressure on them effectively mitigated, so they can continue to provide the same experience for the additional visitors.

#### Policy 22 Promoting jobs and our local economy

We welcome the note within the policy's supporting text that the Royal Parks offer opportunities for economic spin-offs as well as contributing to supporting a high quality and unique environment. It is important that any resultant increase in footfall within the Parks is effectively mitigated through policy support for the work that The Royal Parks does to protect and conserve them.

#### Policy 26 Visitor Economy

As important visitor attractions within the Borough, we would like to see Richmond and Bushy Parks specifically included within this policy in the context of The Royal Parks being supported in providing the necessary infrastructure to support visitor numbers.

#### Policy 28 Local Character and Design Quality

The scale and nature of Richmond and Bushy Parks is such that they are considered to be a significant influence on the local character. It is important that development does not threaten their character. As an important component of the Borough's character, the inclusion of the Parks' importance, and reference to their protection, should be included within this Policy.

#### Policy 29 Designated Heritage Assets

We welcome the Council's approach to heritage assets, especially with regard to the protection and enhancement of the Borough's Historic Parks and Gardens.

#### Policy 31 Views and Vistas

We particularly welcome this policy as it aims to protect the quality of identified views, vistas, gaps and skyline, all of which are important factors in the Royal Parks. We also note that King Henry VIII's mound is included as a protected view which we commend. We would like to work further with the Council to positively manage views from the Parks in the context of new development.

#### Policy 34 Green and Blue Infrastructure

The Royal Parks form a large part of the green and blue infrastructure network within the Borough. We welcome the acknowledgement of recreational pressures and the impact of increased development on the Royal Parks within Richmond and therefore reference to working with The Royal Parks to ensure that careful management is achieved.

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

We are very aware of the importance of this policy and its equivalent in the NPPF and London Plan, given that both Bushy and Richmond Parks are designated MOL, and therefore welcome the inclusion of the policy in the Local Plan.

#### Policy 37 Public Open Space, Play, Sport and Recreation

We welcome the inclusion of this policy as it states that public open space, such as Bushy and Richmond Parks, will be protected. We also welcome the provision of new open spaces as part of development which could mitigate potential increases in visitor numbers to existing parks (including the Royal Parks).

#### Policy 39 Biodiversity and Geodiversity

We welcome this policy given the SSSI designation of both Richmond and Bushy Parks and the National Nature Reserve and SAC designation of Richmond Park.

#### Policy 45 Tall and Mid-Rise Building Zones



Tall buildings around the Parks can have a significant adverse impact on their character. We welcome the inclusion of the protection of views and vistas towards heritage assets across the Borough as well as the protection of parks and would like to work with the Borough to specifically help protect the views from Richmond and Bushy Park.

#### Policy 55 Delivery and Monitoring

In terms of size and value, The Royal Parks are key features of the Borough which provide open space for residents, workers and visitors. It is therefore important that some of the value of development in the Borough helps to support the maintenance, management and protection of Parks which will come under increasing pressure over the Plan period. We would like to work with the Council to achieve this.

### **COMMENTS SPECIFIC TO BIODIVERSITY AND THE ROYAL PARKS' ENVIRONMENTAL DESIGNATIONS:**

#### **2 Introduction**

##### Responding to a changing environment (p12)

We welcome inclusion of paragraphs 2.33 and 2.39 on climate change and biodiversity, which recognise that 'additional residential development and population growth will likely bring more access pressure to the borough's parks and open spaces and make trampling and erosion potential issues. However additional issues of air pollution and light pollution should be identified and included.

##### Strategic objectives (p16 onwards)

We welcome the prominence of climate change, culture and heritage and biodiversity within the strategic objectives.

#### **6 Place-based Strategy for Hampton & Hampton Hill**

##### Policy (p35)

This should include reference to the protection of open space (as well as 'increasing and improving') given the risk to open space associated with increased recreational pressure

##### Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton (p44)



We welcome recognition of potential impacts on the Longford River and the requirement to enhance.

### **7 Place-based Strategy for Teddington & Hampton Wick**

Policy (page 48)

Future development plans should include reference to the protection of open space (as well as 'increasing and improving') given the risk to open space associated with increased recreational pressure

### **10 Place-based Strategy for Ham, Petersham & Richmond Park**

Policy (page 92)

This should fully recognise the need to protect Richmond Park SAC, SSSI and NNR from all impacts associated with development including increased traffic, recreational pressure and light spill. Effective measures to reduce traffic in the vicinity of, and importantly through, Richmond Park should also be included.

### **11 Place-based Strategy for Richmond & Richmond Hill**

Area Profile (page 98)

This should include recognition of the nature conservation designations of Richmond Park as immediately adjacent to this area.

Policy 9 (page 101)

Whilst this policy encourages 'active travel and exercise', it should also identify the need to protect Richmond Park's SAC, SSSI and NNR from impacts associated with recreational pressure, as well as other impacts associated with development, including increased traffic and light spill.

It should also include measures to reduce traffic in the vicinity of, and through, Richmond Park.

### **13 Place-based Strategy for Mortlake & East Sheen**



Area Profile (page 127)

This needs greater recognition of the nature conservation designations of Richmond Park (SAC, SSSI and NNR) as immediately adjacent to the area.

Policy (page 101)

Whilst this policy encourages 'active travel and exercise', it should also identify the need to protect Richmond Park SAC, SSSI and NNR from impacts associated with recreational pressure, as well as other impacts associated with development, including increased traffic and light spill.

It should also include measures to reduce traffic in the vicinity of, and through, Richmond Park.

**21 Increasing biodiversity and the quality of our green and blue spaces, and greening the borough**

Policy 34 (p240). Green and Blue Infrastructure (Strategic Policy)

Recognition of the role of green infrastructure in reducing recreational impacts on sites such as Richmond Park is welcomed. This is included in the background text, but specific reference should also be made within the policy text given the significance of this impact on sites, including the Bushy Park SSSI and Richmond Park SAC, SSSI and NNR.

Policy 39 (p257). Biodiversity and Geodiversity

We welcome this policy and the protection and opportunities it offers for enhancement of designated sites and green corridors. Comments regarding proposed SINC extensions are provided further below.

**23 Reducing the need to travel and improving the choices for more sustainable travel**



Page 283 onwards

Specific reference should be made within this section to the impact of traffic and associated air pollution on designated sites and priority habitats, such as: Richmond Park SAC, SSSI and NNR; Bushy Park SSSI; veteran trees (a critical habitat for stag beetles, the SAC designated interest feature, and SSSI designated interest feature); and acid grassland (SSSI designated interest feature).

This section should also highlight the need for the impacts referenced above to be mitigated by measures to reduce vehicle traffic in the vicinity of, and through, such sites and habitats.

#### **HABITAT REGULATIONS ASSESSMENT (LUC, 2021)**

Screening Assessment, Noise, vibration and light pollution, Richmond Park SAC (page 49)

The report states that '*artificial lighting at night (eg. from street lamps, flood lighting and security lights) is most likely to affect bat populations and some nocturnal bird species*'. There is therefore no consideration of the potential impact on invertebrates such as stag beetle, which may alter their behaviour (including mating activity) or be more vulnerable to predation as a result of artificial lighting. This potential impact on the Richmond Park SAC should be considered.

Screening Assessment, Air Pollution, Richmond Park SAC (page 56)

There is no consideration of through traffic within Richmond Park SAC and the potential for associated air pollution to impact stag beetles, either through impacts on trees and particularly veteran trees, or on soil chemistry (stag beetle larvae developing beneath ground). Nor is there consideration of the impact which local developments or transport policies may have on levels of traffic through the Park.

Screening Assessment, Recreation, Richmond Park SAC (page 58)

Recreation impacts on Richmond Park SAC are discounted solely on the basis of site management. However, as per the discussion for Wimbledon Common (which is screened in for further assessment partly on the basis of its draw to visitors), Richmond Park is subject to extremely high visitor numbers and would likely be impacted by increased development in the Borough to a greater degree given location and accessibility. Visitor pressure is at such a high level that even with extensive resources allocated to tree and deadwood management the tree population - including veteran trees - suffer from compaction and erosion, vandalism and fire (for example), whilst deadwood habitats are subject to significant disturbance by visitors.

It is therefore not considered appropriate to screen the site out from further assessment as a result of recreational pressure and for the incorporation of mitigation within the Local Plan.

### **Review of Sites of Importance for Nature Conservation in Richmond upon Thames (Salix Ecology, 2021)**

The recommendations listed below are included within the report and impact on sites managed by The Royal Parks. We have commented accordingly beneath the quoted paragraphs highlighted in *italics*.

#### *M082 Richmond Park and Associated Areas:*

We have comments relating to the following two paragraphs:

*5.3.10 Add in additional land, including areas of amenity grassland and a small allotment at Palewell Park to ensure continuity of Semi-natural habitat and a wildlife corridor to the Beverley Brook SINC. Include additional areas at the Richmond Park Golf course as a buffer/additional semi-natural habitat to the site.*

*5.3.11 adjust the site boundary adjacent to Petersham Meadows.*

It is assumed that the 'additional areas at the Richmond Park Golf course' comprise the two small Expansion areas on the eastern boundary of the site. Please note that these comprise: an existing overflow car park to the adjacent Roehampton Gate car park (which is included within the existing SINC boundary); and an existing golf driving range largely comprised of closely mown grassland and boundary scrub.



On the assumption that inclusion of these areas within the SINC boundary will not preclude the existing use explained above, there is no objection to these proposals. Other extension areas are on land outside of TRP control.

#### M084 Bushy Park and Home Park

*5.3.13 Incorporate National Physical Laboratory (NPL) land into the SINC. NPL land holdings include extensive areas of acid grassland, a habitat of Principal Importance. Whilst this is currently closely mown, a change of management of selected areas to enhance this habitat may be possible. There is a large area of unmanaged woodland with mature oaks. Although there is understorey of rhododendron and other non-native invasive species, restoration to parkland or native woodland habitat is feasible.*

The habitats located within this area warrant their inclusion in the SINC boundary. There is no objection to these proposals.

#### RiB06 Longford River in Richmond

*5.3.17 Pantile Bridge Open Space, at the junction of Uxbridge Road and High Street Hampton Hill to be added to the existing SINC. Whilst not of high nature conservation value, this small area of amenity grassland acts as a buffer to the SINC.*

There is no objection to these proposals which would provide a buffer to the Longford River.

### **Conclusions and Proposals**

We are pleased to see the quality of the policies put forward which align with many objectives of The Royal Parks.

We would however like to work with the Council to achieve more policy support for The Royal Parks, both in terms of its protection from development beyond the Park boundaries, and in terms of The Royal Parks' own activities and objectives to maintain, protect and enhance these important assets and provide for the increasing number of visitors to them.

In addition to the policy-by-policy comments provided above, we would like to suggest the following actions in respect of the development of this Local Plan:





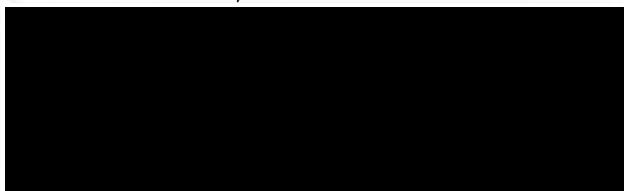
**A stand-alone Royal Parks policy:** Bushy and Richmond Parks account for most of the green space in the Borough and deliver significant environmental and amenity benefits for local residents. The Royal Parks are key features and assets in the London Borough of Richmond upon Thames. It would therefore be proportionate for a specific Royal Parks policy to be included within the Local Plan. This could be similar to draft Policy 32 (Royal Botanic Gardens, Kew World Heritage Site). A specific Royal Parks policy in the Local Plan could refer to the Royal Parks Management Plan. It could then be referred to and cross-referenced within other key relevant policies, for example similarly to how draft Policy 45 refers to Policy 32 (note there is a typo which refers to the policy as Policy 29 rather than Policy 32). We believe the objectives of the Council and The Royal Parks are aligned and we are keen to engage with the Council in the drafting a stand-alone policy which would have the benefit of giving the Parks the protection and support which they require over the Plan period.

Capturing value of development to support The Royal Parks:

The Royal Parks are a key part of green and open space infrastructure in the Borough, in terms of both the quality they provide and the sheer scale of space they provide. Development in the Borough, particularly new residential development, benefits significantly from what the Royal Parks provide but also significantly increases the pressure upon them, through increase and intensification of visitor numbers. The Royal Parks would therefore like to work with the Council to capture the value of relevant development to support The Royal Parks in our work to protect, maintain and enhance the Parks, potentially through S106/CIL contributions over the next Plan period.

As we review and refresh existing policies and develop new initiatives in respect of development within the Parks, we will engage with the Council and other key stakeholders at appropriate times and take into account the new Local Plan for the Borough.

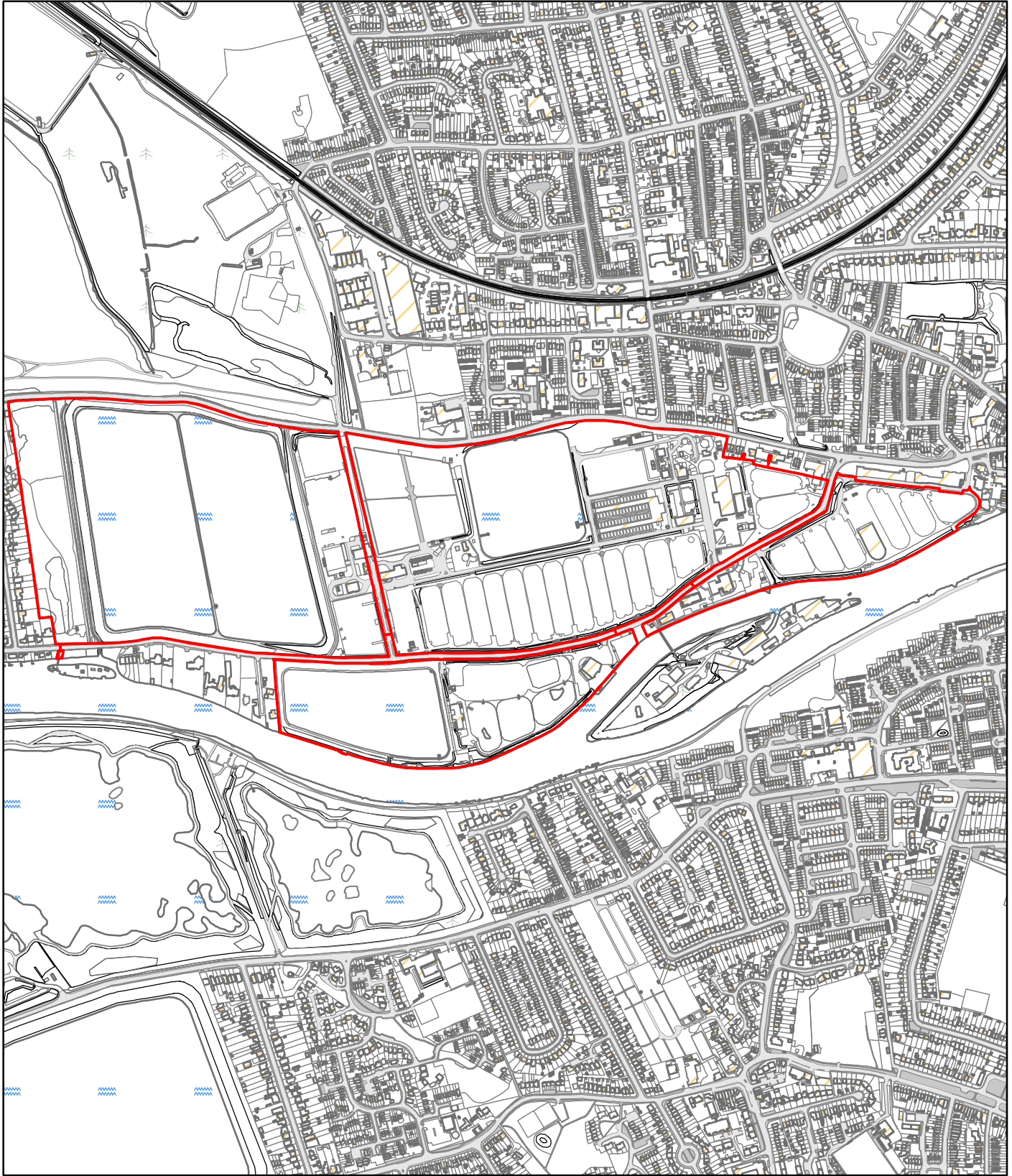
Yours sincerely,



**Darren Woodward**  
**Director of Estates & Projects**



# HAMPTON WTW LOCATION PLAN



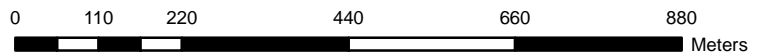
**Thames Water**  
Map



Printed By : twalsh  
 Print Date : 25/01/2022  
 Map Centre On : 512896, 169255  
 Centre Tile No. : TQ1269SE

**Comments:**

Please enter comments here:



Current Scale : 1:10,000

**Disclaimer:** Based on the Ordnance Survey Map with the Sanction of the Controller of H.M Stationery Office License Number:- 100019345

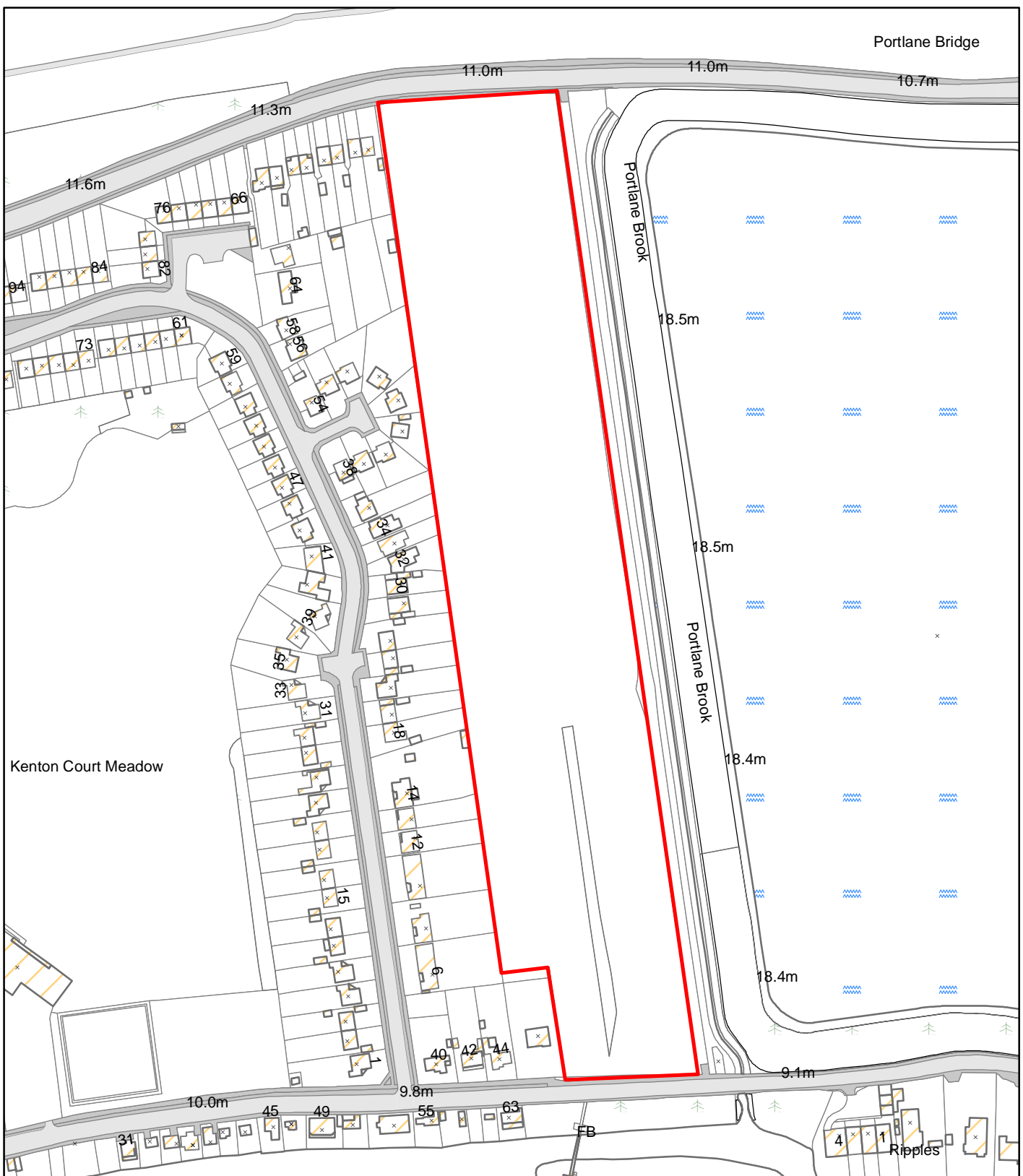
The position of any boundary or apparatus shown on this plan is given without obligation and warranty, and the accuracy cannot be guaranteed.

Service pipes are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Thames Water for any error or omission. The actual position of mains and services must be verified on site before any works are undertaken.

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# Land west of Stain Hill Reservoirs, Lower Sunbury Road - Site Location Plan



**Thames Water Map**

Printed By : CCOLLOFF  
 Print Date : 28/01/2013  
 Map Tile Name: 58480

0 15 30 60 90 120  
 Meters  
 Current Scale : 1:2,500



Comments:

Please enter comments here:

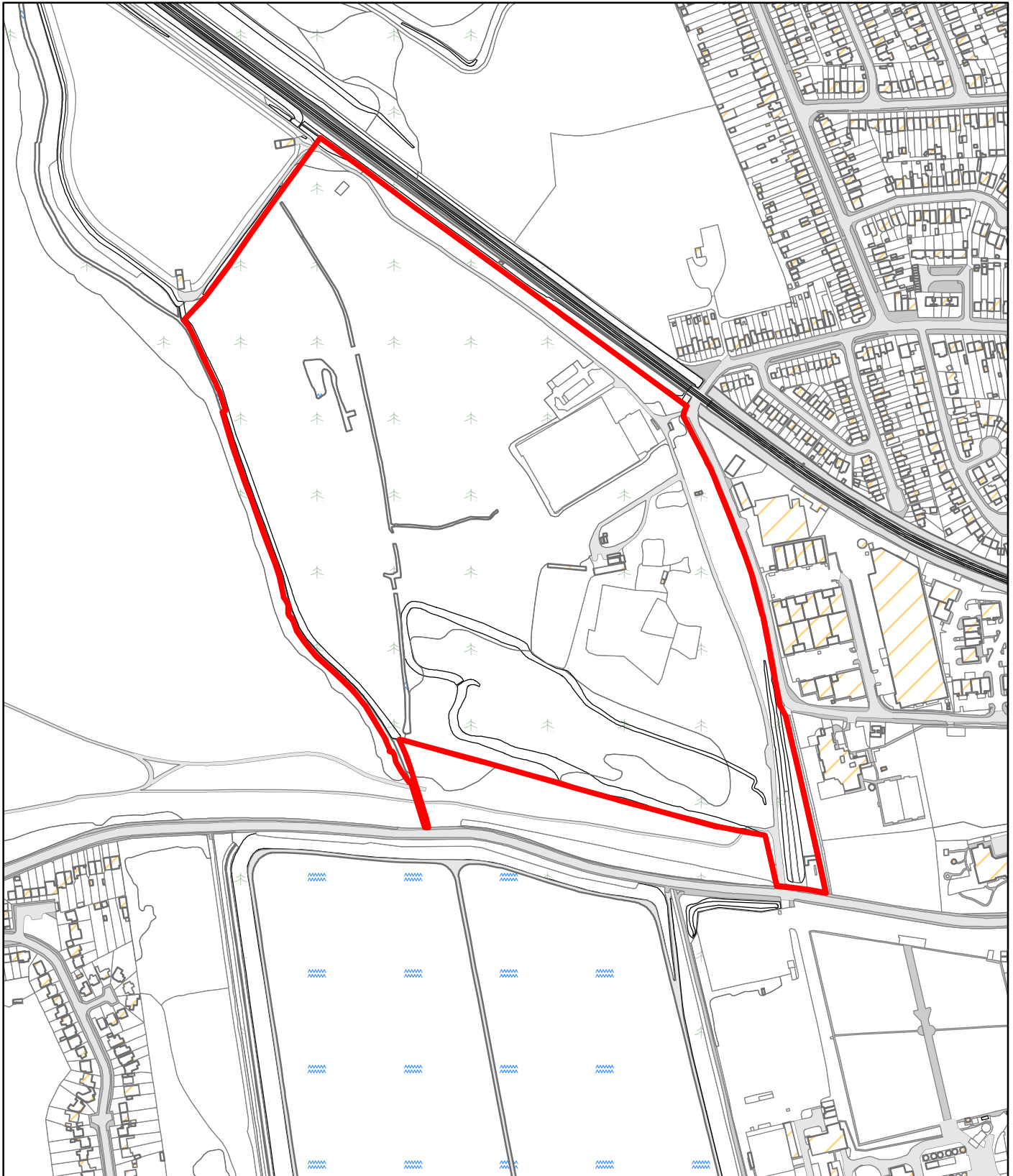
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# Hydes Field, Upper Sunbury Road - Site Location Plan



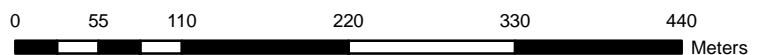
**Thames Water**  
Map



Printed By : twalsh  
Print Date : 25/01/2022  
Map Centre On: 512346, 169940  
Centre Tile No. : TQ1269NW

**Comments:**

Please enter comments here:



**Current Scale : 1:5,000**

**Disclaimer:** Based on the Ordnance Survey Map with the Sanction of the Controller of H.M Stationery Office License Number:- 100019345

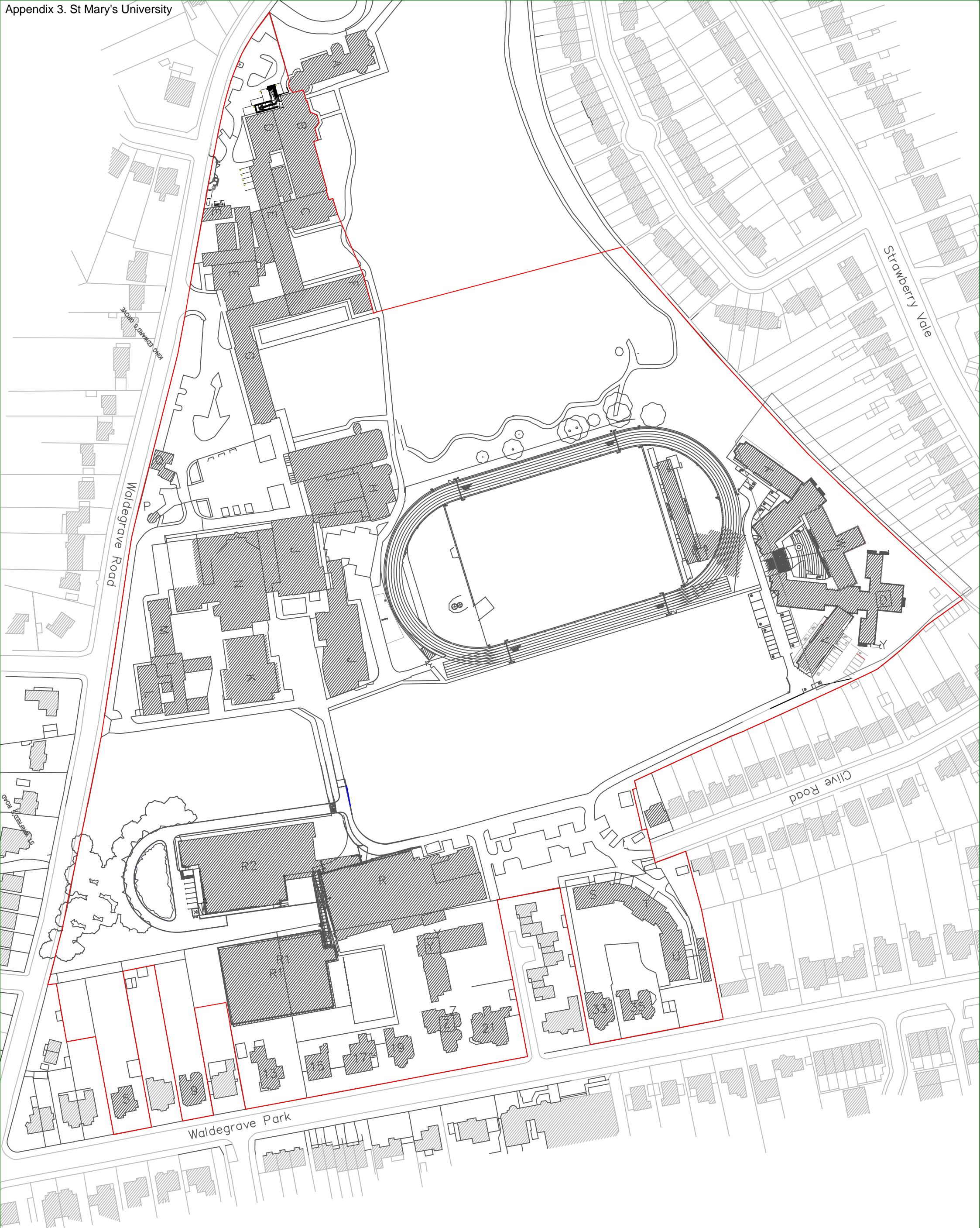
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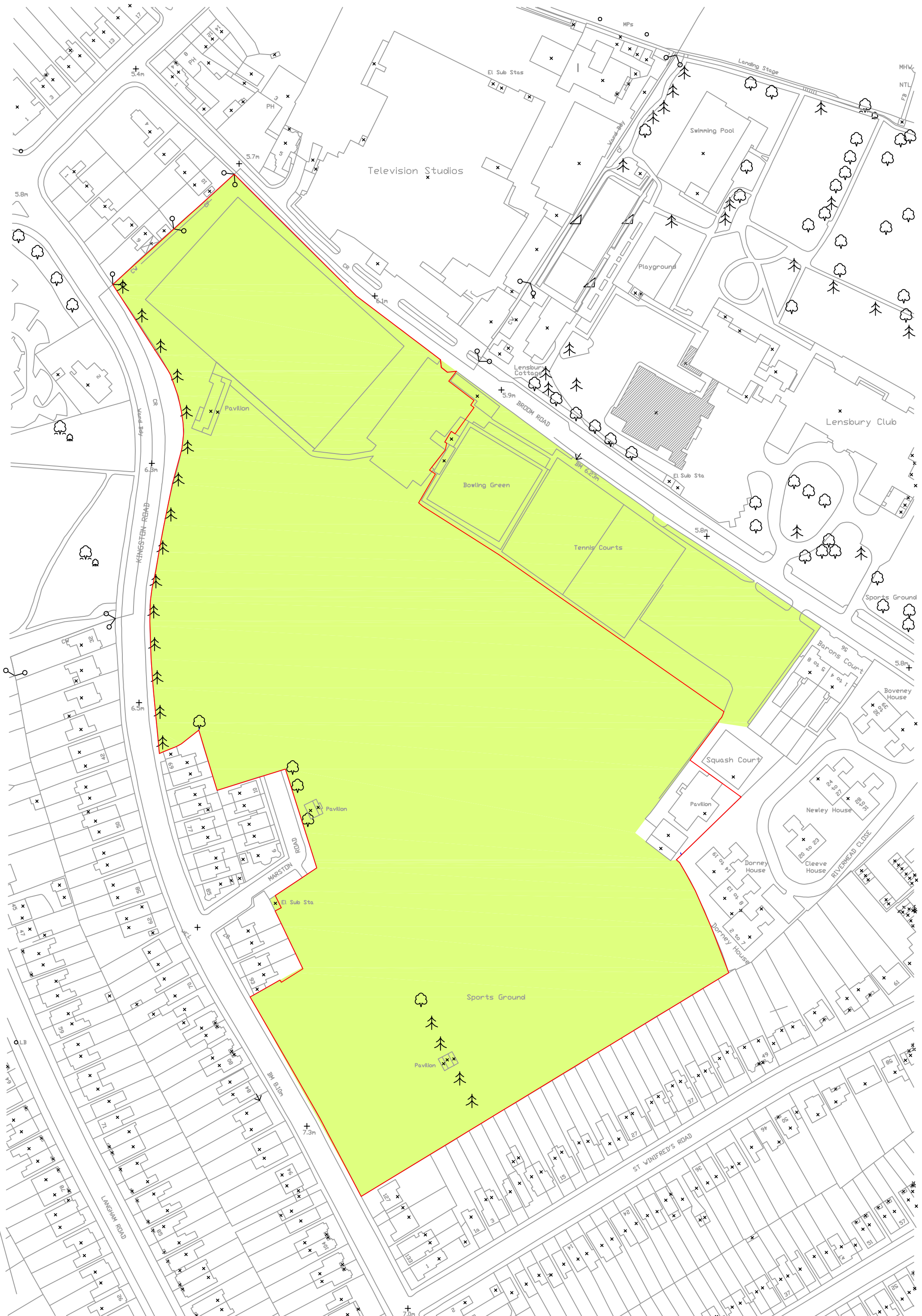






# ST MARY'S UNIVERSITY- MAIN CAMPUS OWNERSHIP PLAN

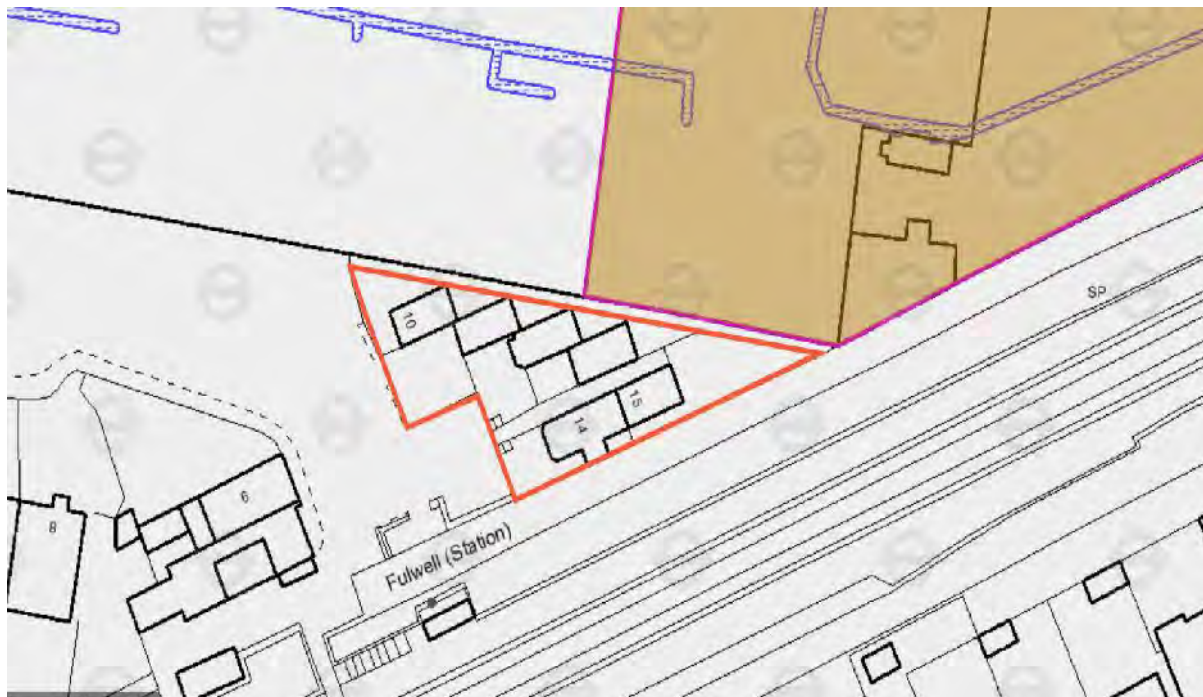




# Transport for London



**Appendix I: Map of properties within Wellington Gardens to be included within the Fulwell Bus Garage site Allocation.**





## **Appendix I**

Townscape and Visual Impact Assessment Addendum  
(Arc, July 2020)





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**Manor Road / Richmond**  
Townscape & Visual Impact Appraisal  
Addendum 03

ARC  
**Addendum July 2020**





arc

JULY 2020  
Arc Ref: RE04-A209-V1

Prepared for  
**Avanton Richmond Development Ltd.**

Prepared by  
**Arc Landscape Design and Planning Ltd.**  
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A Registered Practice of the Landscape Institute and Urban Design Group

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**ARC** LANDSCAPE DESIGN AND PLANNING LTD.

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3. Appraisal of Effects of the Amended Proposed Development	9
4. Summary and Conclusions	13
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APPENDIX B AVR METHODOLOGY	44
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NO PARKING  
ANYTIME  
IN THIS ZONE  
EXCEPT AS  
SIGNPOSTED

Blue arrow sign pointing left

Blue and yellow bollard

MEB SE

ets

Small sign on the right side of the image



## 1. Introduction

1.1 This Townscape and Visual Impact Assessment Addendum (July 2020 TVIA Addendum) has been prepared by Arc Landscape and Planning on behalf of Avanton Richmond Development Ltd ('the Applicant') following further amendments to the proposed scheme for the redevelopment of the Homebase store at 84 Manor Road, North Sheen ('the Site').

1.2 A planning application for the redevelopment of the Site was submitted to London Borough of Richmond Upon Thames (LBRuT) in February 2019 (ref. 19/0510/FUL) (the 'Original Proposed Development'), and was considered at LBRuT Planning Committee on 3 July 2019. The Planning Committee resolved that they were minded to refuse the Application; the second suggested reason for refusal related to design and stated that "*The proposed development, by reason of its siting, layout, height, scale, bulk, design and materials is considered to represent a visually intrusive, dominant and overwhelming form of overdevelopment to the detriment of the character of the site and surrounding area.*"

1.3 However on 29 July 2019 it was confirmed that the Mayor of London would act as the local planning authority for the purposes of determining the application.

1.4 In relation to urban design, the GLA's stage 1 report (15 April 2019) supported the proposed layout, heights and massing, stating: "*The heights and massing strategy responds positively to the existing low-rise context, with the scale dropping down to respect neighbouring properties along the south and eastern edges...Given the context and the sensitive design approach taken by the applicant, the heights and massing is considered to be acceptable.*"

### Proposed Amendments

1.5 Following review of LBRuT's suggested reasons for refusal and discussions with Officers at the Greater London Authority (GLA) and Transport for London (TfL), the Applicant reviewed the scheme, with the principle aim of increasing the delivery of affordable housing through additional density and addressing other issues raised in the Mayor's Stage 2 Report. Initial scheme amendments were submitted

in November 2019 ('the November 2019 Amendments') which increased the overall number of units by 48, primarily through the introduction of a new residential building known as Block E. The potential townscape and visual effects of the November 2019 Amendments were appraised in an addendum (the November 2019 TVIA Addendum).

1.6 Following discussions with TfL and the GLA, it was agreed that further revisions should be developed in order to deliver an improved scheme without the need for Block E. The revised scheme is hereafter referred to as the 'Amended Proposed Development'.

1.7 The proposed changes are described in detail in the accompanying Design and Access Statement Addendum, however, of particular note is the increase in residential units from 385 within the Original Proposed Development to 453 within the Amended Proposed Development. The increase in units and the higher affordable housing provision has been principally achieved through amendments to the height and internal layout in appropriate locations across the Site.

1.8 The proposed changes necessitate an amendment to the Application's description of development. The revised description of development is as follows:

*Demolition of existing buildings and structures and comprehensive phased residential-led redevelopment to provide 453 residential units (of which 173 units will be affordable), flexible retail, community and office uses, provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.*

1.9 As a result of the proposed amendments, the findings of the original TVIA have been reviewed in order to assess the townscape and visual effects of the Amended Proposed Development. Changes of relevance to this assessment include building elevations being rationalised to improve architectural consistency, the extension of commercial frontage along Manor Road and redistribution of the massing. By way of summary:

- Building A: Core A + 1 storey; Core D - 1 storey;
- Building B: + 2 storeys;
- Building C: Core A + 3 storeys; Cores B and C + 1 storey; and
- Building D: Core B - 1 storey

1.10 This addendum should be read in conjunction with the original TVIA (ref A209-RE-01) and the May 2019 addendum (ref A209-RE-02) which assessed two additional representative viewpoints located within Kew Gardens (Views A1 and A2). This was in response to GLA officers' request that further assessment of the potential impact on Kew Gardens World Heritage Site be carried out.

1.11 This TVIA addendum is supported by three appendices:

- Appendix A: Representative View Assessment;
- Appendix B: AVR Methodology; and
- Appendix C: Representative Views A1 and A2 cropped to 50mm

### Consultation - Representative Views

1.12 A request was received from the World Heritage Site Coordinator, Georgina Darroch, on 7 April 2020 that "*an additional image looking along Cedar Vista, larger than the existing representative views, and in full rendered mode*" be provided. This was in response to the addition of Block E in the November 2019 Amendments. The request was also made that the view be taken during winter months when any intervening deciduous tree cover would be bare of leaf, however, it should be noted that the intervening tree cover from this location is predominantly evergreen and it is not considered that visibility would increase in winter months.

1.13 Testing of representative views A1 and A2 demonstrated that the removal of Block E meant that the Amended Proposed Development will not be visible from the Royal Botanic Gardens; an additional rendered view along the Cedar Vista has not therefore been prepared.

1.14 As requested, high resolution enlarged versions of representative views A1 and A2 are set out in **Appendix C** of this addendum.

1.15 On 13 July 2020, a communication was received from the GLA Case Officer concerning the approach to preparing the representative views. The revised Landscape Institute guidance on preparing visualisations (Landscape Institute Technical Guidance Note 06/19 for Visual Representation of Development Proposals, published in September 2019) advocates the use of 50mm or 35mm lenses, but does

allow for uses of other types of lens where justified. The Case Officer acknowledged that the revised LI guidance was published after the original application was submitted (February 2019).

1.16 In order to capture the proposal within its urban setting, a 24mm lens was used to capture the photography (further detail provided in **Appendix B** of this addendum), however, as requested by the GLA, for distant views, both the original 24mm images and cropped 50mm images have been provided (see **Appendix C** of this addendum).







## 2. Methodology and Baseline Conditions

### Methodology

2.1 The assessment methodology applied in the original TVIA was based on GLVIA3 and is still appropriate and relevant.

2.2 Since the Original Proposed Development was submitted for planning approval in May 2019, the Landscape Institute have published updated Technical Guidance on the preparation of verified views ('06/19 Visual Representation of Development Proposals'). Albeit that the Accurate Visual Representations (AVRs) prepared by Assael Architects for both the original TVIA and this addendum use photography taken before publication of the updated technical guidance, the AVR methodology has been updated to explain how the production of the AVRs aligns with the updated LI technical guidance (see **Appendix B**).

2.3 Cropped and enlarged views of representative views A1 and A2, are provided in **Appendix C** of this addendum for comparison.

### Baseline Conditions

2.4 The February 2019 TVIA identified potentially sensitive receptors which could experience effects on townscape character or on visual amenity as a result of the Original Proposed Development. No significant changes in the baseline conditions described in the February 2019 TVIA have been identified and no additional potentially sensitive landscape or visual receptors have therefore been identified.

2.5 The baseline conditions identified in the original TVIA have not therefore changed and the descriptions and assessments of receptor sensitivity in the February 2019 TVIA and the May 2019 addendum remain valid.

### Representative Views

2.6 The February 2019 TVIA which supported the Original Proposed Development was informed by 12 AVRs, with the two additional representative views requested by LBRuT submitted in the May 2019 TVIA addendum (ref A209-RE-02).

2.7 The 14 original representative views have been updated with the Amended Proposed Development and the revised appraisal of effects on the representative views is provided at **Appendix A** of this addendum.





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### 3. Appraisal of Effects of the Amended Proposed Development

#### Introduction

3.1 This section considers how the Amended Proposed Development, illustrated in the accompanying planning application documents, will affect the receptors identified in the original baseline study. The first part of this section describes the anticipated effects relating to the Site and the wider townscape character. The second part describes the effects on the visual receptors representative views.

3.2 To assist in defining potential effects, the sensitivity of the townscape character and visual receptors is considered. As outlined in the methodology, sensitivity is determined by combining assessments of value (set out in Section 3 of the February 2019 TVIA) and an appraisal of the susceptibility of the receptors to the Amended Proposed Development. The findings for each are set out in **Tables 4.1 and 4.2**.

3.3 For each receptor, the magnitude of change resulting from the Amended Proposed Development is described. The magnitude of change, upon completion, considers the effects in terms of duration, reversibility, geographical extent and size or scale. Since any effects of the Amended Proposed Development are considered to be long term and permanent, to avoid unnecessary duplication, duration and reversibility are not discussed further.

3.4 In order to further illustrate the effects, updated representative views are provided at **Appendix A**.

#### Description of Amended Proposed Development compared to Original Proposed Development

3.5 As with the Original Proposed Development, the Amended Proposed Development seeks full planning permission for the demolition of the existing building and redevelopment of the Site for predominantly residential use.

3.6 Whilst many of the original principles including the concentration of height in the centre of the site and stepping down the massing at the edges of the site (on Manor Road and along the southern boundary) remain, updates to the massing:

- Building A: Core A increased by one storey and Core D decreased by one storey;
- Building B: Core A increased by two storeys;
- Building C: Core A increased by three storeys and Cores B and C by one storeys;
- Building D: Core B decreased by one storey.

3.7 Additional changes of potential relevance to townscape and visual matters include updates to the elevations to increase consistency in detail across the scheme, with each elevation having one of three façade types with a common treatment to the base of all the blocks façades, and the extension of retail frontage along Manor Road, increasing activity and the amount of active frontage.



Figure 3.1 - Block plan (Amended Proposed Development)



## Effect on Townscape Character

3.8 This section considers the effects of the completed Amended Proposed Development on townscape character. Definitions and criteria used are found in **Appendix B** of the February 2019 TVIA.

3.9 There will be temporary, localised effects during the construction phase caused by additional larger vehicles, deliveries, cranes and plant etc. These effects are considered to be negative, however they will be short-lived and temporary in nature and are not considered further.

3.10 At a national level the townscape character has been considered in line with the NPPF and the Amended Proposed Development '*responds to local character and history, and reflects the identity of local and surrounding materials, while not preventing or discouraging appropriate innovation*', as set out in paragraph 58.

3.11 Overall it is considered that the Amended Proposed Development, like the Original Proposed Development, improves the townscape situation of 'TCA1 North Sheen Mixed Use', as shown in representative views 6, 7, 10 and 12 of **Appendix A**. The Amended Proposed Development is of a scale and mass that will not detract from the surrounding context and will reactivate the street frontage along Manor Road with an enhanced retail offering and areas of public realm. The heights and massing strategy responds positively to the existing low-rise context, with the scale dropping down to respect neighbouring properties along the southern and eastern edges.

3.12 The Amended Proposed Development would continue to have a direct, permanent, high magnitude of change and overall **moderate and beneficial effect** on TCA1.

3.13 Partial to glimpsed views are possible from 'TCA2 Manor Grove Residential' (representative view 1) of the Amended Proposed Development and the Amended Proposed Development has an indirect, permanent, low magnitude of change and **minor and neutral effect** on this TCA. From 'TCA6 Richmond Residential Fringe', glimpsed views of it will be possible (representative views 4 and 5). The Amended Proposed Development has an indirect, permanent, negligible magnitude of change and **minor and neutral effect** on TCA6 Richmond Residential Fringe'.

3.14 The Amended Proposed Development indirectly affects the areas of 'TCA3 North Sheen Residential' which are close to the Site (representative views 2 and 11) and from which glimpsed views are possible. Overall, the Amended Proposed Development would continue to have an indirect, permanent, low to negligible magnitude of change and overall **minor to negligible and neutral effect** on TCA3.

3.15 The Amended Proposed Development will continue to result in negligible to no magnitude of change and overall **negligible and neutral to no effect** on 'TCA4 East Sheen Open Space', 'TCA5 Richmond Hill and East Sheen Residential'. 'TCA7 Kew Gardens and Old Deer Park' and 'TCA8 Kew Gardens Residential Fringe'; their value, susceptibility to change and sensitivity are summarised in **Table 4.1**.

3.16 The Amended Proposed Development enhances the townscape character and visual appearance of this area of Richmond. It provides high quality architecture that improves legibility within the local and wider townscape. The Amended Proposed Development provides a well designed development which relates positively to the existing building line of Manor Road and respects the receiving context.

## Effects on Visual Receptors

3.17 With the implementation of the Amended Proposed Development, it is considered that, like the Original Proposed Development, the Site's ZTV will increase, with the views from some of the visual receptors identified within the baseline assessment changing.

3.18 There will be temporary, localised changes in the view from some visual receptors during the construction phase, typically associated with the temporary enclosure of the Site with hoarding and views of construction plant. These effects are considered to be negative, however they will be short-lived and temporary in nature and are not considered further.

3.19 In order to identify and assess the likely effects of the completed Amended Proposed Development on the identified views and visual receptors, the 14 Accurate Visual Representations (AVR) which supported the Original Proposed Development have been updated.

3.20 The AVRs and a description of the likely effects of the Amended Proposed Development for each of the 14 representative viewpoints are provided at **Appendix A** and in **Table 3.2** which provides a summary of the findings relating to the value of the views, the sensitivity of the receptors and the magnitude of change resulting from the Amended Proposed Development.

3.21 The following provides a summary of the visibility of the Amended Proposed Development for the key visual receptors / receptor groups:

- The Amended Proposed Development will, however, continue to be visible from views orientated outside the southern section of Sheendale Road Conservation Area, as shown in representative views 4 and 12.
- The mature trees within the Royal Botanic Gardens Kew (World Heritage Site) will prevent views to the Amended Proposed Development, as shown in representative views A1 and A2. A limited glimpsed view will continue to be possible for visitors to the viewing platform of the Pagoda when it is open to the public, as illustrated in representative view 9. The Site, however, is a minor component in the wider 360 view of this area of west London.
- It is considered that the Amended Proposed Development will continue to be visible from the North Sheen Allotments, but not Richmond Cricket Club and North Sheen Recreation Ground due to intervening vegetation.

- Where windows are orientated towards the Site, it is considered that partial to glimpsed views will continue to be possible of the Amended Proposed Development from upper stories of low to mid rise residential properties and taller residential apartment block located within 500 metres of the Site.
- Representative views 1, 2, 4 and 6 demonstrate that the Amended Proposed Development will continue to be visible from the public highway where roads are orientated towards the Site and representative views 5 and 7 illustrate it will also be visible from elevated locations and bridges within 750 metres of the Site.
- Away from the roads orientated towards the Site and elevated locations, built form and intervening vegetation typically will continue to prevent views to the Amended Proposed Development, as demonstrated in representative views 3 and 8.
- Open to partial views are likely to continue to be visible towards the Amended Proposed Development from Manor Road and the railway lines which run adjacent to the Site, as shown in representative views 10, 11 and 12.

**Table 3.1 – Townscape Character Appraisal of Effects**

Townscape Character Area	Value	Susceptibility to change	Sensitivity	Magnitude of change	Effect	Effect of Original Proposed Development
TCA 1 North Sheen Mixed Use	Medium to low	Low	Low	High	Moderate / Beneficial	<i>Moderate / Beneficial</i>
TCA 2 Manor Grove Residential	Medium	Medium to Low	Medium to Low	Low	Minor / Neutral	<i>Minor / Neutral</i>
TCA 3 North Sheen Residential	Medium to low	Medium to Low	Medium to Low	Low to Negligible	Minor to Negligible / Neutral	<i>Minor to Negligible / Neutral</i>
TCA 4 East Sheen Open Space	High to medium	High	High	Negligible to None	Negligible / Neutral	<i>Negligible / Neutral</i>
TCA 5 Richmond Hill and East Sheen Residential	High	High	High	Negligible to None	Negligible / Neutral to None	<i>Negligible / Neutral to None</i>
TCA 6 Richmond Residential Fringe	High	High to Medium	High	Negligible	Minor / Neutral	<i>Minor / Neutral</i>
TCA 7 Kew Gardens and Old Deer Park	Exceptional	High	High	Negligible to None	Negligible / Neutral to None	<i>Negligible / Neutral to None</i>
TCA 8 Kew Gardens Residential Fringe	Exceptional to high	High	High	Negligible to None	Negligible / Neutral to None	<i>Negligible / Neutral to None</i>

**Table 3.2 – Visual Receptor Representative Views Appraisal of Effects**

Representative View	Value	Susceptibility to change	Sensitivity	Magnitude of change	Effect	Effect of Original Proposed Development
1. Manor Grove	Medium	Medium	Medium	Medium	Moderate / Neutral	<i>Moderate / Neutral</i>
2. Manor Road, opposite Townsend Terrace	Medium-Low	Medium-Low	Medium-Low	Medium-Low	Moderate-Minor / Beneficial	<i>Moderate-Minor / Beneficial</i>
3. Sheen Road, over Hickey's Almshouses	High	Medium	High-Medium	None	None	<i>None</i>
4. Dee Road	Medium-Low	Medium	Medium-Low	Medium	Moderate / Neutral	<i>Moderate / Neutral</i>
5. Church Roadw	Low	Low	Low	Low-Negligible	Negligible / Neutral	<i>Negligible / Neutral</i>
6. Trinity Road	Medium-Low	Medium	Medium	Medium	Moderate / Neutral	<i>Moderate / Neutral</i>
7. Lower Richmond Road/Manor Road roundabout	Low	Low	Low	Low-Negligible	Minor / Neutral	<i>Minor / Neutral</i>
8. Sandycombe Road	Medium-Low	Medium	Medium-Low	None	None	<i>None</i>
9. View from Pagoda, Royal Botanic Gardens of Kew	High	High	High	Negligible	Minor / Neutral	<i>Minor / Neutral</i>
10. Manor Road, Sainsbury's entrance	Low	Low	Low	Medium	Moderate-Minor / Beneficial	<i>Moderate-Minor / Beneficial</i>
11. Manor Road, near Manor Grove	Low	Low	Low	High to medium	Moderate / Beneficial	<i>Moderate / Beneficial</i>
12. Crown Terrace	Low	Medium-Low	Low	High	Moderate / Neutral	<i>Moderate / Neutral</i>
A.1 Broad Walk, Royal Botanic Gardens of Kew	High	High	High	None	None	<i>None</i>
A.2 Cedar Vista, Royal Botanic Gardens of Kew	High	High	High	None	None	<i>None</i>





Under no circumstances should any vehicle stop on the level crossing



## 4. Summary and Conclusions

### Introduction

4.1 This addendum to the February 2019 TVIA (ref A209-RE-01) considers the potential townscape and visual effects which could arise from the Amended Proposed Development.

4.2 The Amended Proposed Development continues to reference local architectural detailing, styles and character along with providing a contextual material palette. It consists of four blocks which range in height from three to 11 storeys. The taller elements of the blocks are concentrated in the centre of the Site away from the boundaries emphasising the location of the central Courtyard. Top floor set-backs are present on the perimeter blocks.

4.3 Along Manor Road the built form of Blocks A and D continue to address the street, helping to define the street, and providing active frontages/natural surveillance. These blocks are set back to provide a high quality public realm and introduce a line of trees to the townscape. Further areas of new soft landscaping are provided, particularly at the interfaces with the railway lines.

### Townscape Character Areas Appraisal

4.4 As with the Original Proposed Development, the Amended Proposed Development has been designed to respond to and complement its location. The facade treatments and massing have been designed to respond to the receiving townscape.

4.5 The Site falls within 'TCA1 – North Sheen Mixed Use' and the existing building and current uses do little to contribute to the wider townscape of the area. It is considered that 'TCA1 – North Sheen Mixed Use' can accommodate the Amended Proposed Development and there will be a continued moderate and beneficial effect.

4.6 The Amended Proposed Development has a minor and neutral effect on 'TCA2 Manor Grove Residential' and on 'TCA6 Richmond Residential Fringe', a minor to negligible and neutral affect on 'TCA3 North Sheen Residential' and negligible and neutral to no change in the remaining TCAs within the Study Area.

### Visual Appraisal

4.7 Existing views to the Site are largely restricted due to the surrounding built form, with partial to open views gained from the immediate townscape of Manor Road, Manor Grove, Dee Road and Trinity Road.

4.8 With the implementation of the Amended Proposed Development it is considered that the visibility of the Site will increase, however the Amended Proposed Development will not adversely affect any views of importance or the visual appearance of the local area.

4.9 Like the Original Proposed Development, the Amended Proposed Development will provide an efficient redevelopment of a currently under-developed and unattractive site and, overall, it is considered that the Amended Proposed Development will lead to direct, permanent effects on the following representative views:

- Moderate beneficial/neutral effect - representative views 1, 4, 6, 11 and 12
- Moderate-Minor beneficial effects- representative views 2 and 10
- Minor neutral/beneficial effect- representative views 7 and 9
- Negligible neutral/ beneficial effect- representative view 5
- No effects - representative views 3, 8, A1 and A2

### Conclusions

4.10 This addendum should be read in conjunction with the February 2019 TVIA (ref A209-RE-01) and the May 2019 addendum (ref A209-RE-02).

4.11 The height, massing and architecture of the Amended Proposed Development responds to the sensitivities of the Site context. As with the Original Proposed Development, the tallest buildings are positioned in the centre of the Site, away from existing residential properties, and along the western boundary, with the scale dropping down to the southern and eastern edges, respecting neighbouring properties. The Amended Proposed Development represents an efficient redevelopment of a currently under-developed and unattractive site and does not represent a visually intrusive, dominant or overwhelming form of overdevelopment. It is therefore considered that there would be no adverse effects on either the character of the Site, the surrounding area or on visual receptors.

4.12 The appraisal of effects in this addendum relating to the Amended Proposed Development concludes that there is no change in either townscape or visual effects when compared to the Original Proposed Development.

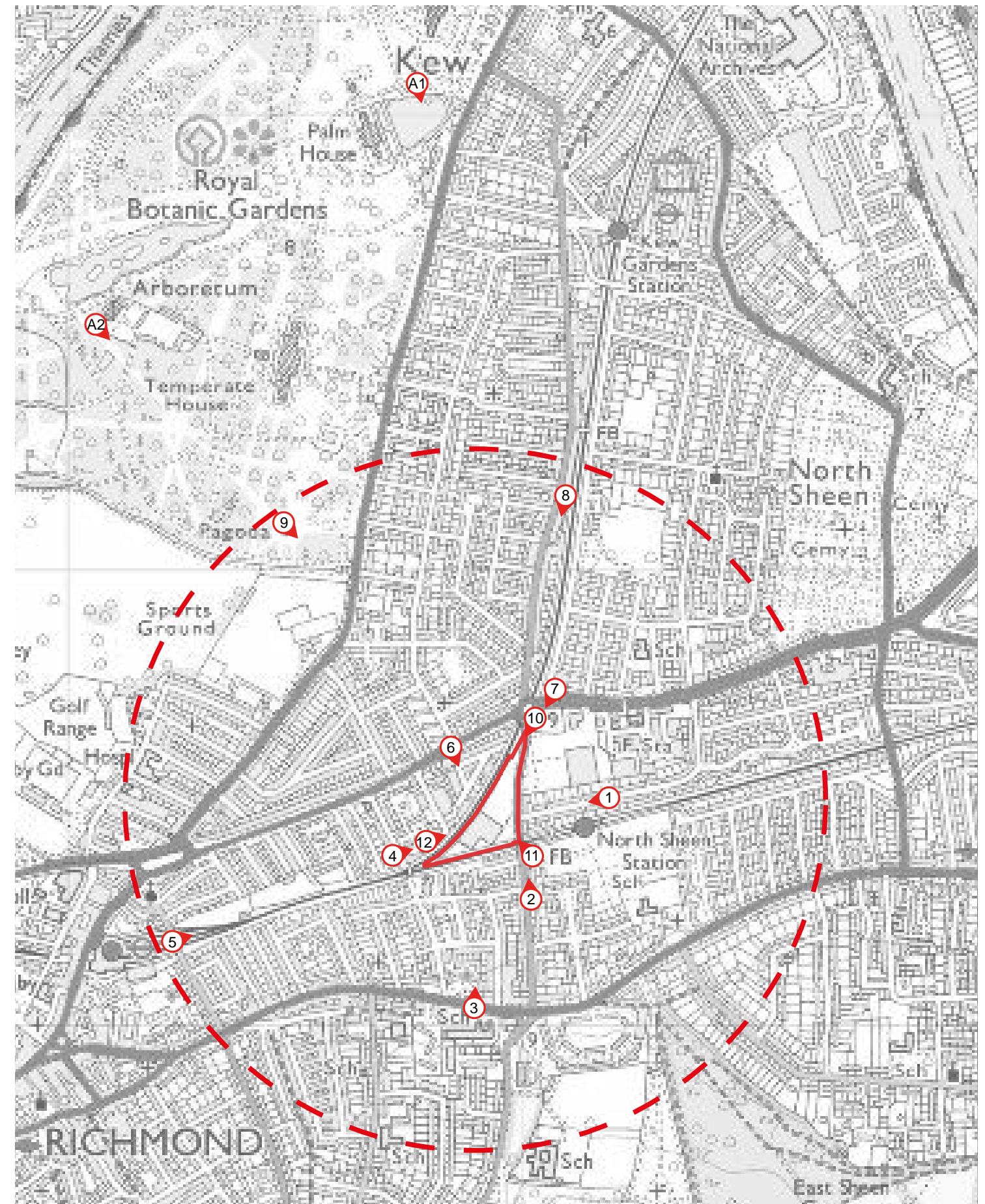


# APPENDIX A REPRESENTATIVE VIEW APPRAISAL

## Introduction

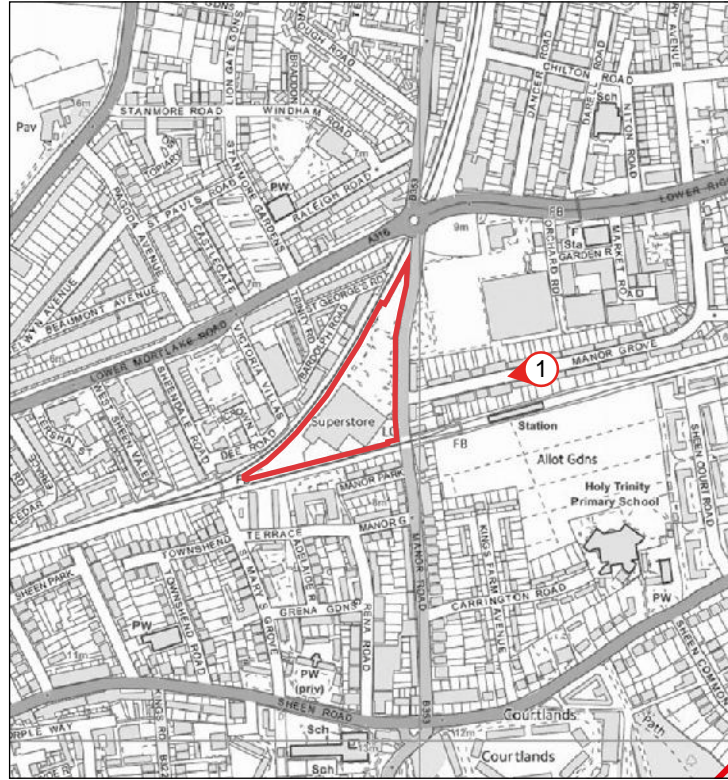
A.1 A selection of original proposed development receptors. These receptors are shown as red pins and are located at GLA; AVRs were prepared and these have been Development.

A.2 Within the A Development falls be with a red wireline d seen within the view





Representative view 1 – Manor Grove



Location Plan

Baseline condition

A.3 Baseline conditions remain unchanged.



Representative view 1 - Existing Situation





Representative view 1 - Proposed Situation (Amended Proposed Development)

## Appraisal of Effects

A.4 The assessment of sensitivity remains unchanged.

## Effects of the Amended Proposed Development

A.5 The upper floors of elements of the Amended Proposed Development's Blocks A, B and D can continue to be seen in the background of the view from this section of Manor Grove. The materials and architectural treatment of the Amended Proposed Development's facade have been selected to be complementary to the existing buildings of Manor Grove, which are of townscape merit.

A.6 Overall it is considered that the Amended Proposed Development will continue to have a local, direct, permanent, medium magnitude of change, since the Amended Proposed Development will continue to be visible only in views westwards towards the end of the street, Manor Grove is lined with tree and visibility of the Amended Proposed Development will reduce for receptors further east along Manor Grove resulting in a **moderate and neutral effect**.



Representative view 2 – Manor Road opposite Townsend



Location Plan

Baseline conditions

A.7 Baseline conditions remain unchanged. .



Representative view 2 - Existing Situation





Representative view 2 - Proposed Situation (Amended Proposed Development)

## Appraisal of Effects

A.8 The assessment of sensitivity remains unchanged.

## Effects of the Amended Proposed Development

A.9 The Amended Proposed Development's Blocks A and D will continue to be seen in the background of the view, continuing the building line along Manor Road, along with the landscape strategy's new street planting. These blocks, along the road, respond to the existing height present in the fore and middle ground of the view and help to define Manor Road.

A.10 Within the view the taller elements of Blocks A and D, which frame the public square, are set back from Manor Road. This ensures that they do not appear too dominant and help to create an articulated skyline, denoting the central Courtyard.

A.11 It is considered that the Amended Proposed Development will continue to have a local, direct, permanent, medium to low magnitude of change and a **moderate to minor and beneficial effect**.



Representative view 3 – Sheen Road, over Hickey’s Almsh



Location Plan

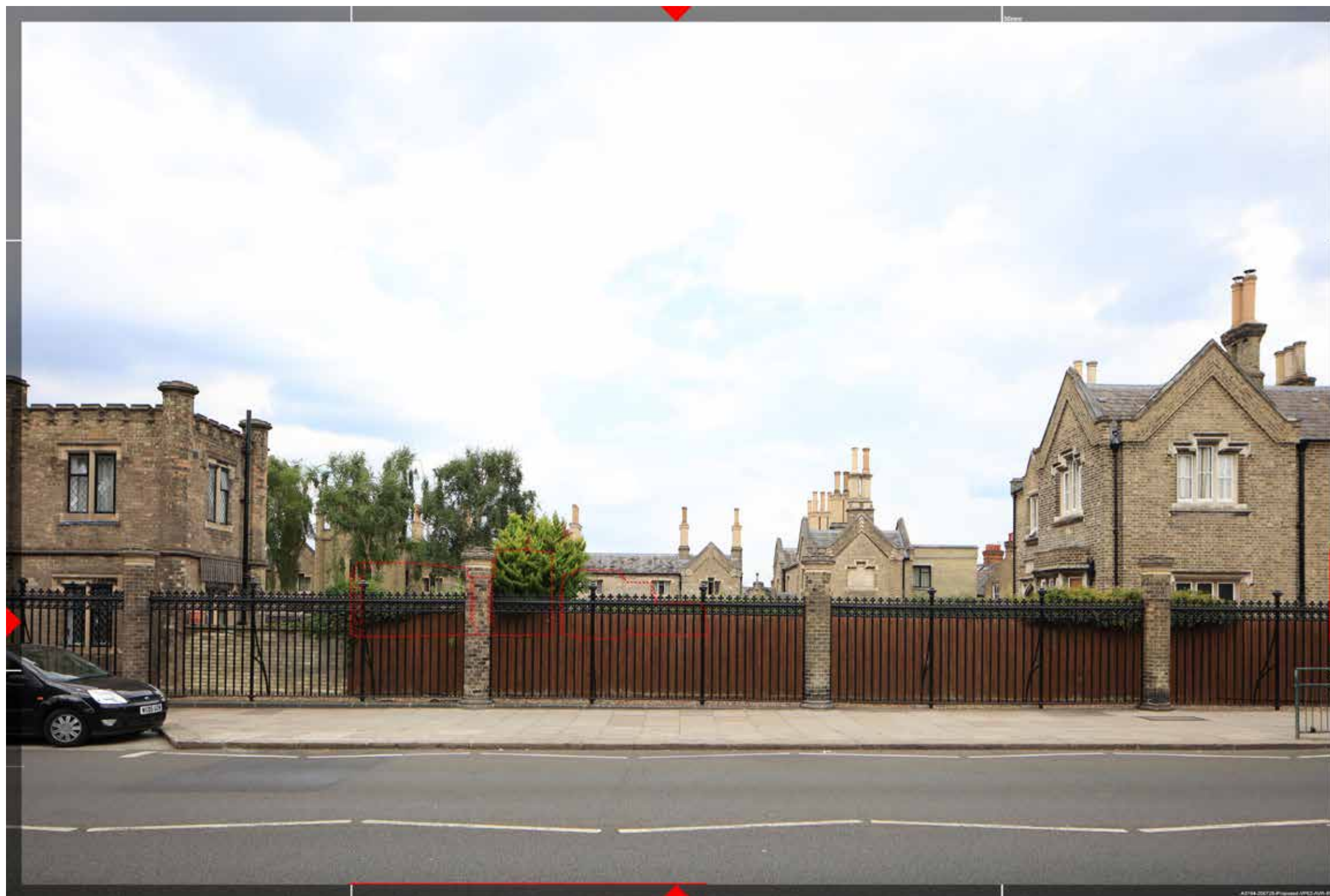
Baseline conditions

A.12 Baseline conditions remain unchanged. .



Representative view 3 - Existing Situation





Representative view 3 - Proposed Situation (Amended Proposed Development)

## Appraisal of Effects

A.13 The assessment of sensitivity remains unchanged. .

## Effects of the Amended Proposed Development

A.14 The Amended Proposed Development cannot be seen in this view and there will therefore continue to be no change in the view and **no effect**.

*A cropped enlarged version of the Representative View is provided in Appendix C of this addendum.*



Representative view 4 – Dee Road



Location Plan

Baseline conditions

A.15 Baseline conditions remain unchanged.



Representative view 4 - Existing Situation





Representative view 4 - Proposed Situation (Amended Proposed Development)

## Appraisal of Effects

A.16 The assessment of sensitivity remains unchanged.

## Effects of the Amended Proposed Development

A.17 The western façades of the Amended Proposed Development's Blocks B and C will continue to be seen in the far middle ground of the view, beyond the railway line, and from this location, they present as being of similar height to the existing built form within the middle and foreground of the view.

A.18 Block B facade includes architectural detailing that references the built form within the Study Area, such as the white stone banding which contrasts with the brick, breaking up the facade. Block's C facade is constructed with red brick and broken up with bay windows, which is also present within the Study Area.

A.19 The break between the blocks has been orientated to maintain the linear nature of the view and ensure the Amended Proposed Development does not appear overly dominant within the view.

A.20 Overall it is considered that the Amended Proposed Development will continue to have a local, direct, permanent, medium magnitude of change and a **moderate and neutral effect**.



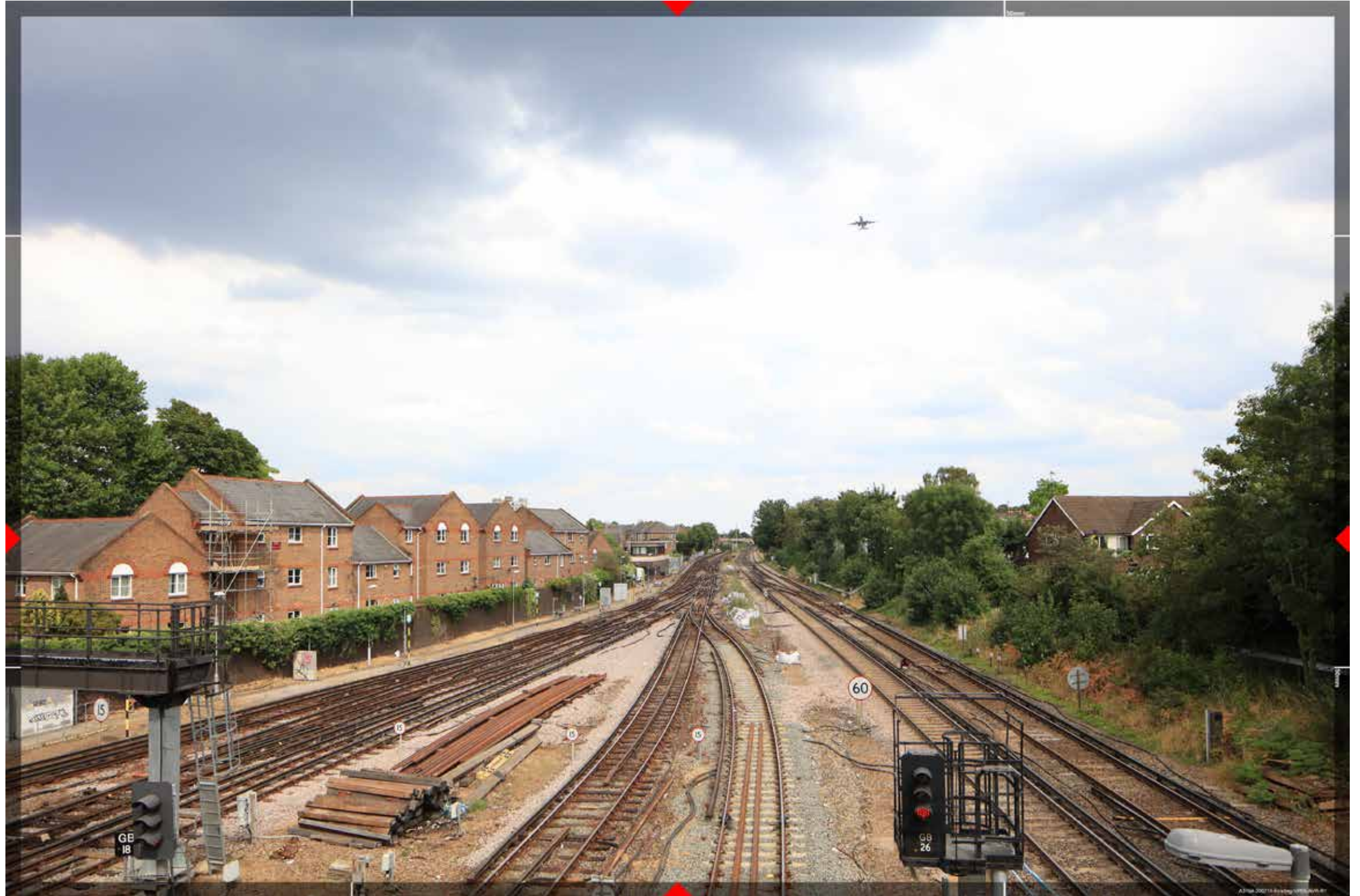
**Representative view 5 – Church Road**



Location Plan

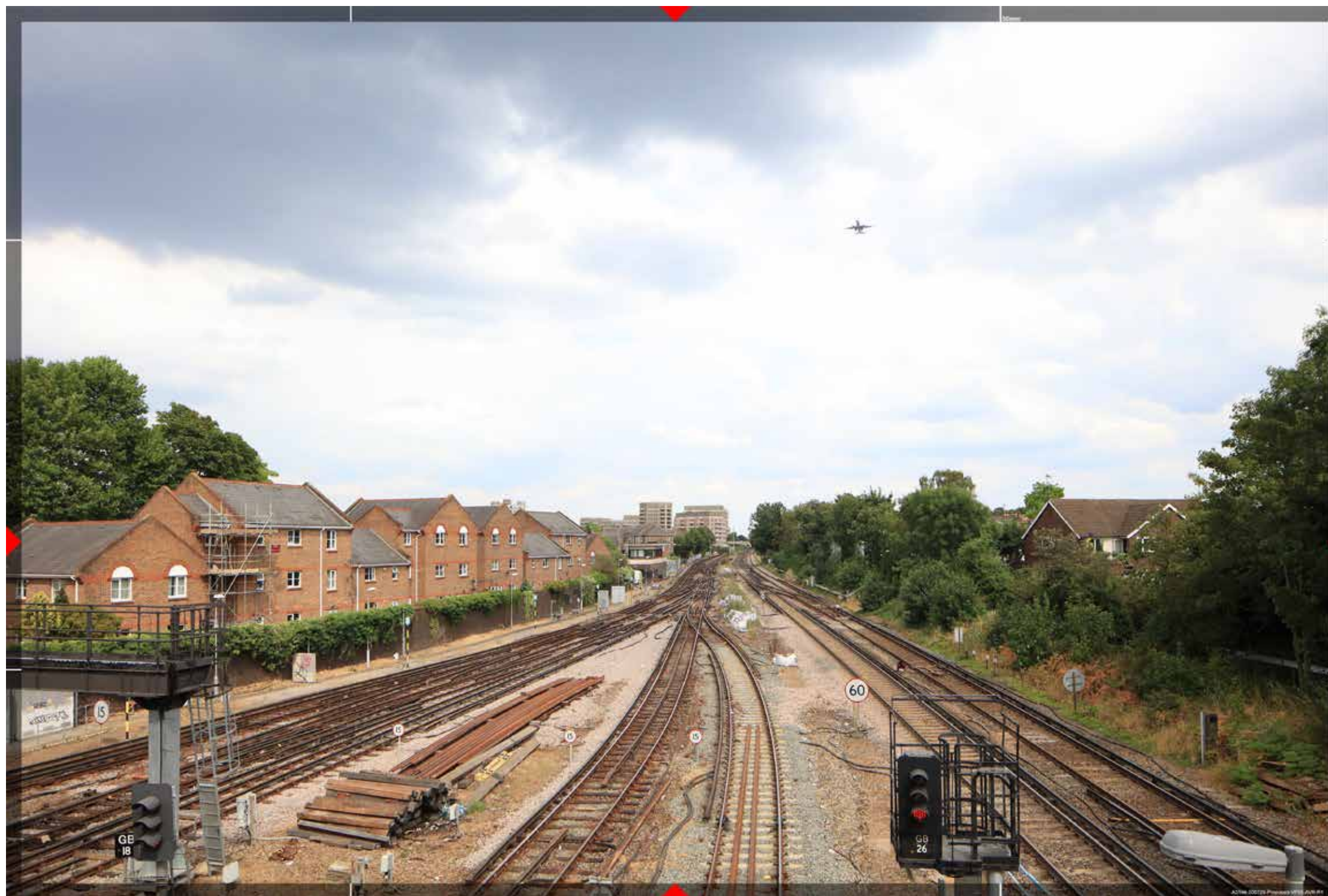
**Baseline conditions**

A.21 Baseline conditions remain unchanged.



**Representative view 5 - Existing Situation**





Representative view 5 - Proposed Situation (Amended Proposed Development)

## Appraisal of Effects

A.22 The assessment of sensitivity remains unchanged.

## Effects of the Amended Proposed Development

A.23 The upper floors of all of the Amended Proposed Development's blocks will continue to be seen in the far background of the view and they are read in conjunction with the existing built form. The blocks have been designed to step in height and provide a varied skyline within this view.

A.24 The Amended Proposed Development aids with legibility within the surrounding townscape. Overall it is considered that the Amended Proposed Development will continue to have a local, direct, permanent, low to negligible magnitude of change and a **negligible and neutral effect**.

*A cropped enlarged version of the Representative View is provided in Appendix C of this addendum.*



Representative view 6 – Trinity Road



Location Plan

Baseline conditions

A.25 Baseline conditions remain unchanged.



Representative view 6 - Existing Situation





Representative view 6 - Proposed Situation (Amended Proposed Development)

## Appraisal of Effects

A.26 The assessment of sensitivity remains unchanged.

## Effects of the Amended Proposed Development

A.27 The marker building of Block B will continue to be seen in the far middle ground of the view, beyond Manor House on Bardolph Road; its distinctive design presenting as a complementary extension to the existing built form.

A.28 Behind Block B, a glimpsed view can be gained to Block C's upper floors. Both blocks are set below the existing buildings skyline from this viewpoint.

A.29 It is considered that the Amended Proposed Development will continue to have a local, direct, permanent, medium magnitude of change and a **moderate and neutral effect**.



Representative view 7 – Lower Richmond Road/Manor Road



Location Plan

Baseline conditions

A.30 Baseline conditions remain unchanged.



Representative view 7 - Existing Situation





Representative view 7 - Proposed Situation (Amended Proposed Development)

## Appraisal of Effects

A.31 The assessment of sensitivity remains unchanged.

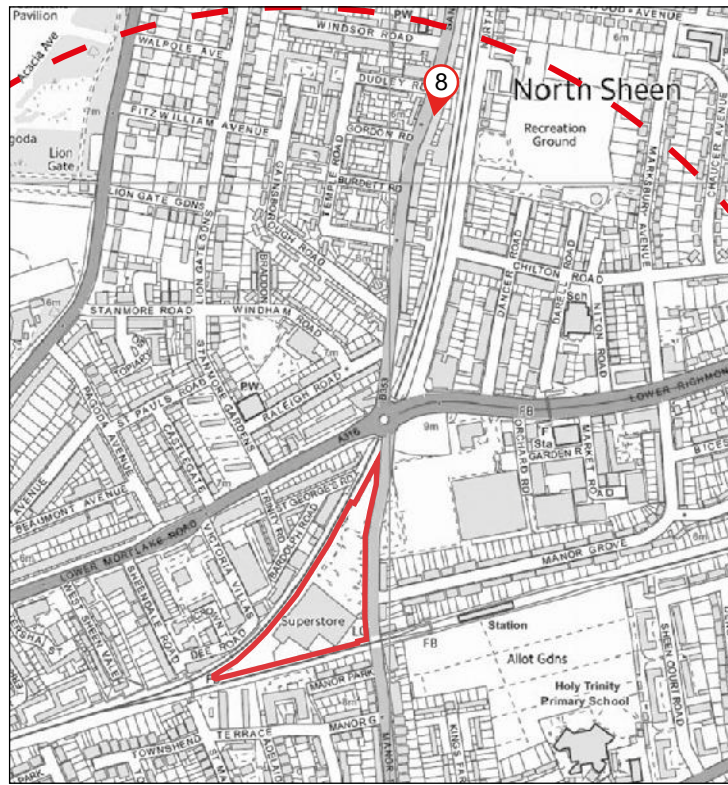
## Effects of the Amended Proposed Development

A.32 The upper floors of the Block A will continue to be seen in the middle far ground of the view. This helps to provide an enhanced sense of enclosure to the road junction.

A.33 There is a tonal difference between the architectural treatment and material of the middle and the top of the block. Its articulation and top floor set back helps to break up the mass of the Amended Proposed Development within the view.

A.34 The Amended Proposed Development is considered to have a local, direct, permanent, low to negligible magnitude of change and a **minor and neutral effect**.

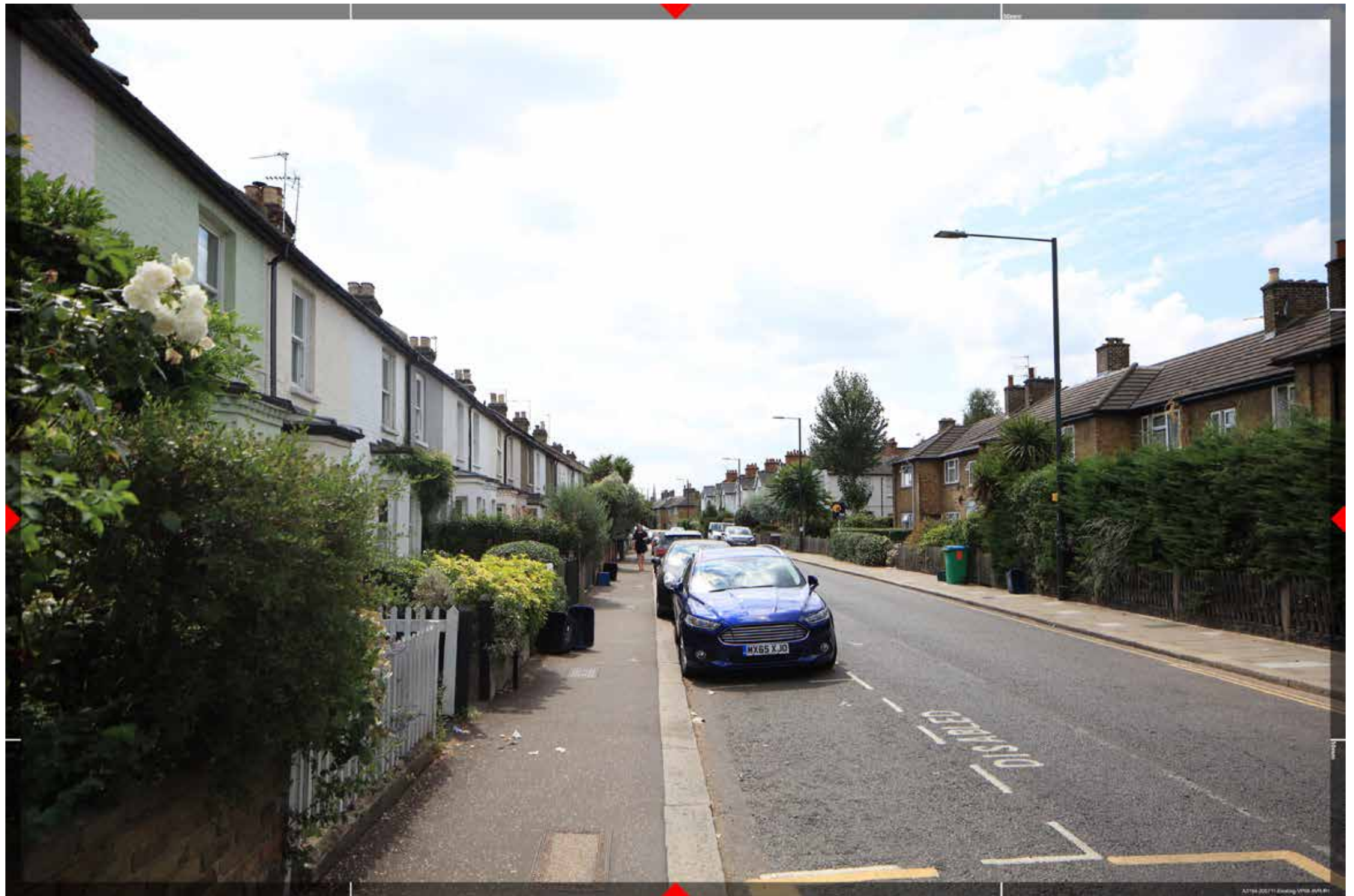




Location Plan

### Baseline conditions

A.35 Baseline conditions remain unchanged.



Representative view 8 - Existing Situation





Representative view 8 - Proposed Situation (Amended Proposed Development)

## Appraisal of Effects

A.36 The assessment of sensitivity remains unchanged..

## Effects of the Amended Proposed Development

A.37 The Amended Proposed Development cannot be seen in this view and there will therefore be no change in the view and **no effect**.

*A cropped enlarged version of the Representative View is provided in Appendix C of this addendum.*





Location Plan

Baseline conditions

A.38 Baseline conditions remain unchanged. .



Representative view 9 - Existing Situation





Representative view 9 - Proposed Situation (Amended Proposed Development)

## Appraisal of Effects

A.39 The assessment of sensitivity remains unchanged.

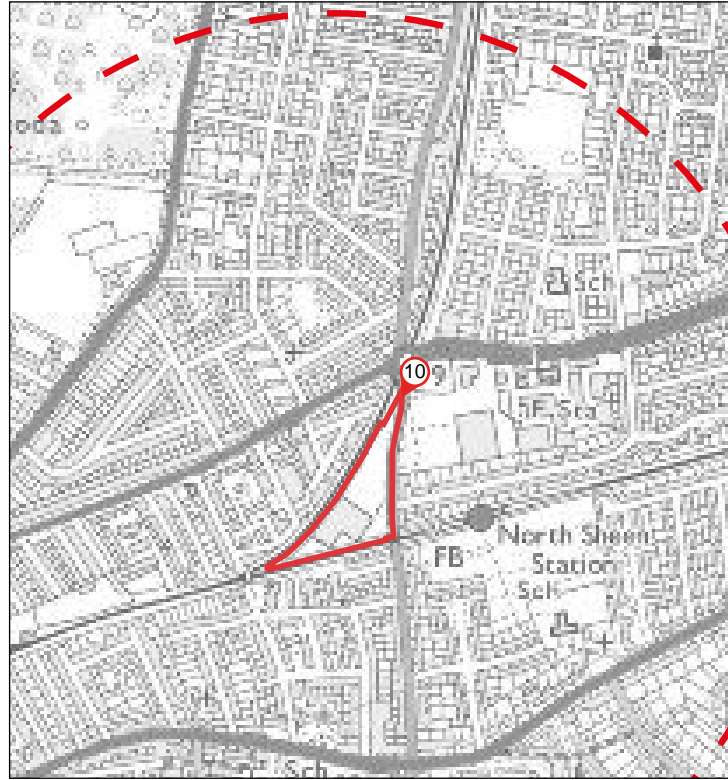
## Effects of the Amended Proposed Development

A.40 The Amended Proposed Development will be a component within the panoramic 360 degree view from the top of the pagoda when looking south, however it will not be visible on the skyline and will be experienced within the context of the wider context of built form.

A.41 Overall it is considered that the Amended Proposed Development will continue to have a local, direct, permanent, negligible magnitude of change resulting in a **minor and neutral effect**.

*A cropped enlarged version of the Representative View is provided in Appendix C of this addendum.*





Location Plan

Baseline conditions

A.42 Baseline conditions remain unchanged.



Representative view 10 - Existing Situation





Representative view 10 - Proposed Situation (Amended Proposed Development)

## Appraisal of Effects

A.43 The assessment of sensitivity remains unchanged.

## Effects of the Amended Proposed Development

A.44 The Amended Proposed Development's Block A can be seen in the middle ground of the view, helping to enclose and define Manor Road. Beyond, Core B of Block A steps down to respond to the existing building height along the road and its ground floor entrances provide animation to the streetscape.

A.45 The varied building heights of block A, along with its facade articulation and top floor set back aid with breaking up the mass of the Amended Proposed Development within the view.

A.46 Overall it is considered that the Amended Proposed Development will continue to have a local, direct, permanent, medium magnitude of change and a **moderate to minor and beneficial effect**.



**Representative view 11 – Manor Road**



Location Plan

**Baseline conditions**

A.47 Baseline conditions remain unchanged.



Representative view 11 - Existing Situation





Representative view 11 - Proposed Situation (Amended Proposed Development)

## Appraisal of Effects

A.48 The assessment of sensitivity remains unchanged.

## Effects of the Amended Proposed Development

A.49 The Amended Proposed Development's Block D can be seen in the middle ground of the view and Block A in the background. The blocks introduce a new built form and scale into the townscape. This helps to provide an enhanced sense of enclosure to Manor Road.

A.50 There is a clear difference between the architectural treatment of bottom, middle and the top of Blocks A and D eastern buildings, where they face Manor Road and the ground floor entrances provide animation to the street. The buildings are well proportioned, giving a human scale, and the façade materials reflect those already present along the road. The inset balconies aid in visually reducing the mass of the buildings.

A.51 The taller elements of Block D and Block A are set back from Manor Road. This ensures that they do not appear too dominant and help to create an articulated skyline.

A.52 The Amended Proposed Development is considered to have a local, direct, permanent, high to medium magnitude of change resulting in a **moderate and beneficial** effect.



Representative view 12 – Crown Terrace and Victoria Cotta



Location Plan

Baseline conditions

A.53 Baseline conditions remain unchanged.



Representative view 12 - Existing Situation





Representative view 12 - Proposed Situation (Amended Proposed Development)

## Appraisal of Effects

A.54 The assessment of sensitivity remains unchanged.

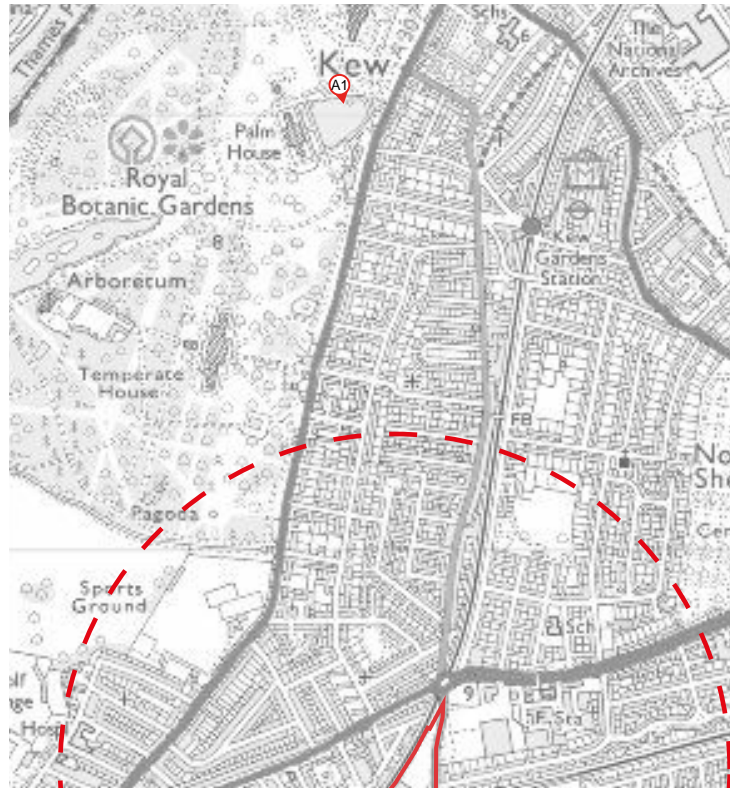
## Effects of the Amended Proposed Development

A.55 The Amended Proposed Development's Block C will continue to be seen in the middle ground of the view and Block B can be seen behind the existing tree, with Block A beyond. This view demonstrates how the Amended Proposed Development provides a new frontage to the railway line and Dee Road, providing natural surveillance.

A.56 Block C's façade is broken up with bay windows and its top floor is set back, this helps to break up the mass of the Amended Proposed Development within the view.

A.57 Overall it is considered that the Amended Proposed Development will continue to have a local, direct, permanent, high magnitude of change and a **moderate and neutral effect**.

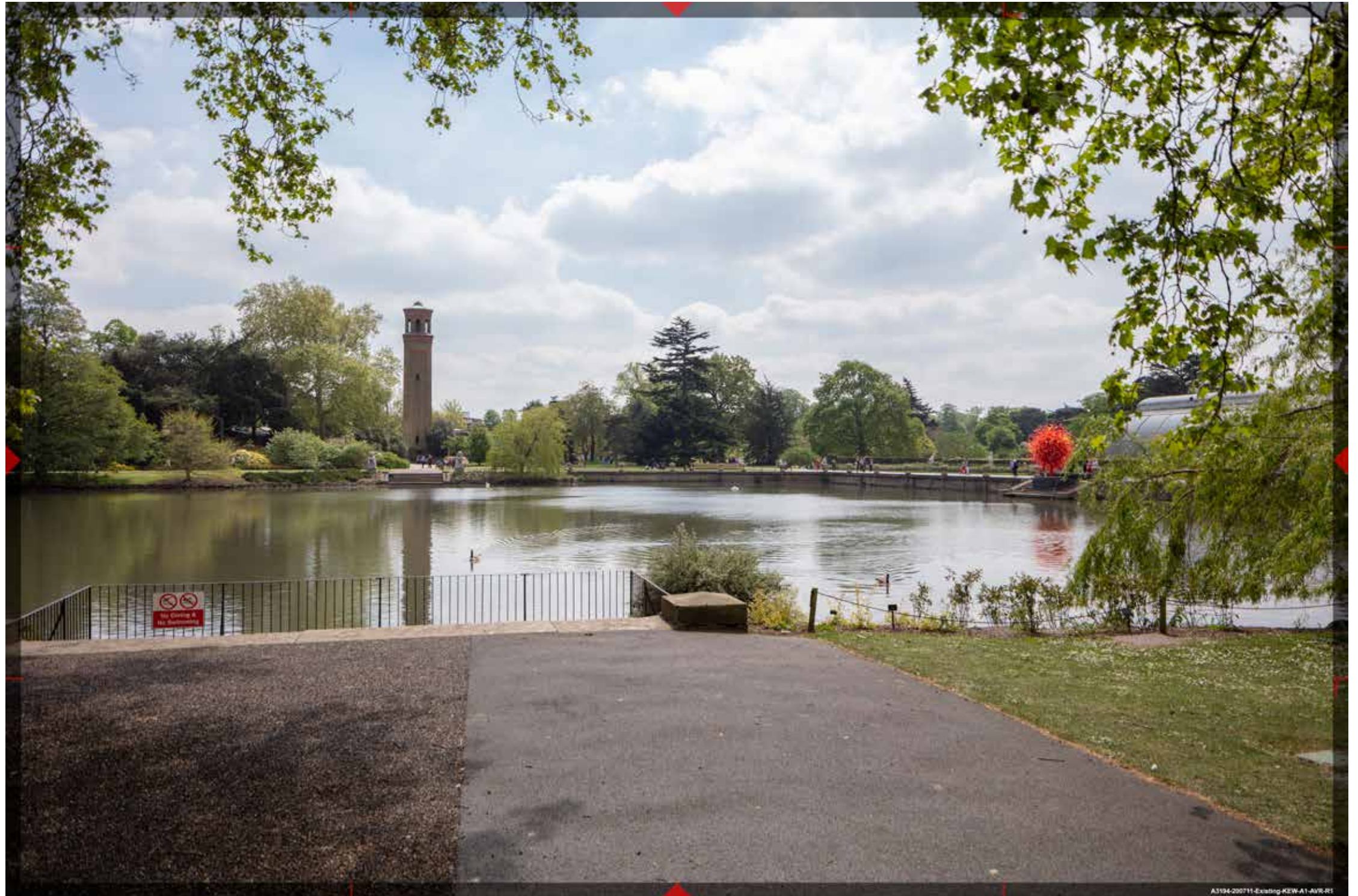




ation Plan

Baseline condition

8 Baseline conditions remain unchanged.



Representative view A1 - Existing Situation





Representative view A1 - Proposed Situation (Amended Proposed Situation)

## Appraisal of Effects

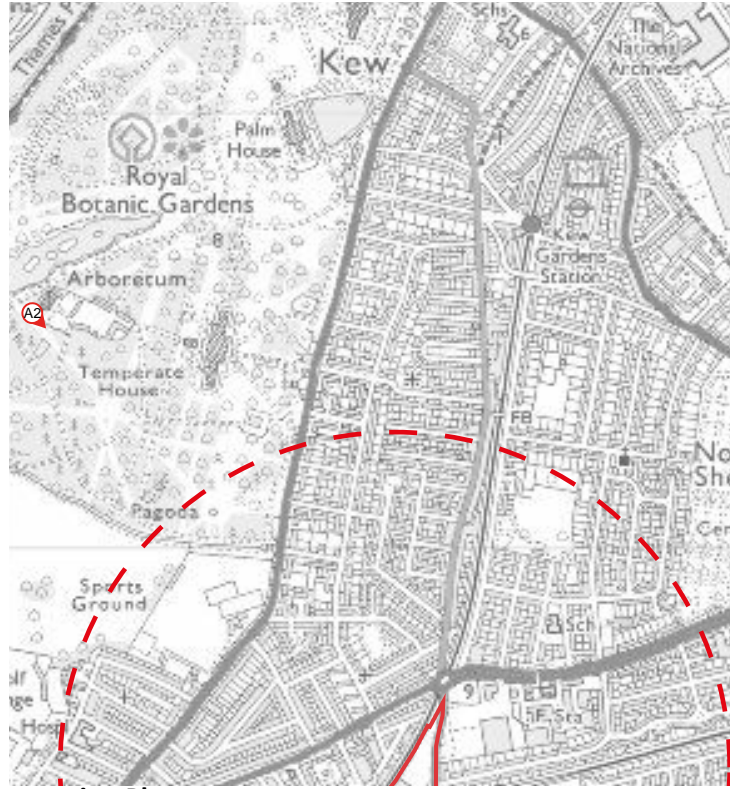
A.59 The assessment of sensitivity remains unchanged.

## Effects of the Amended Proposed Development

A.60 The Amended Proposed Development will not be visible within the view and it is therefore considered that there will continue to be no change in the view as a result of the Amended Proposed Development and **no effect**.

*A cropped enlarged version of the Representative View is provided in Appendix C of this addendum.*

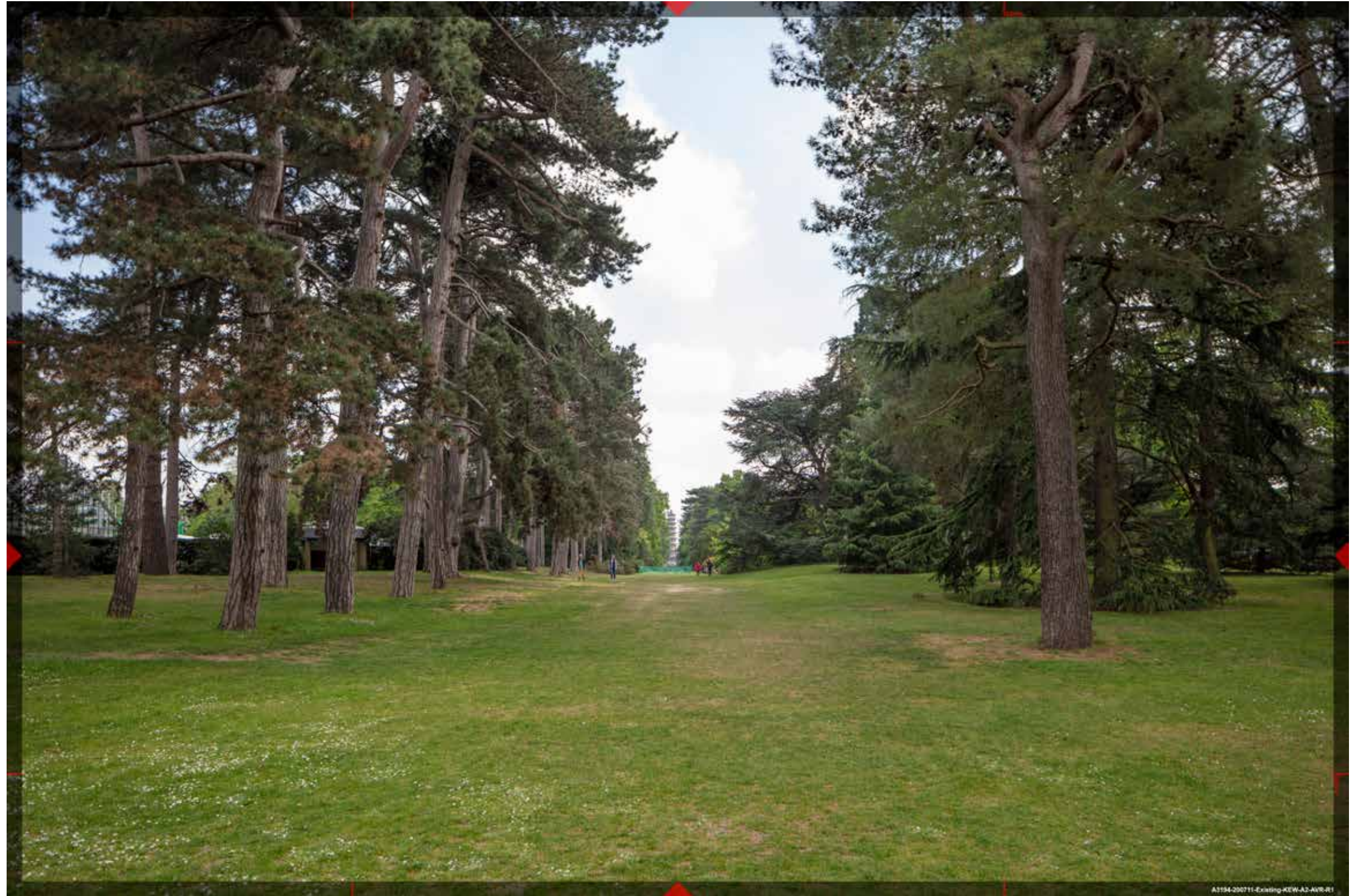




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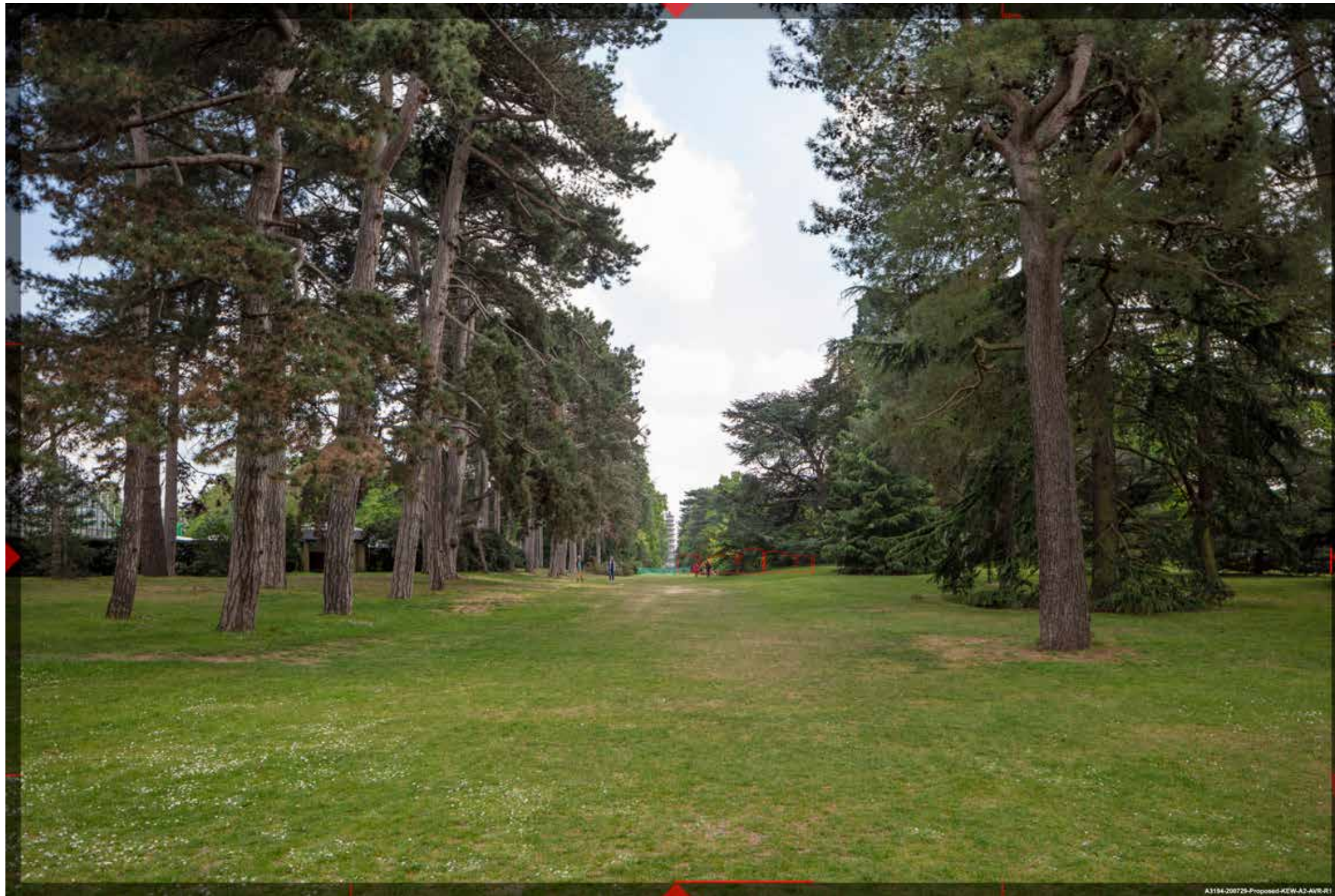
### Baseline conditions

- 1 Baseline conditions remain unchanged.



Representative view A2 - Existing Situation





Representative view A2 - Proposed Situation (Amended Proposed Development)

### Appraisal of Effects

A.62 The assessment of sensitivity remains unchanged.

### Effects of the Amended Proposed Development

A.63 The Amended Proposed Development will not be visible within the view and it is therefore considered that there will be continue to no change in the view as a result of the Amended Proposed Development, resulting in **no effect**.

*A cropped enlarged version of the Representative View is provided in Appendix C of this addendum.*



# APPENDIX B AVR METHODOLOGY

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**Manor Road, Richmond**  
AVR Methodology Statement

## 1.1 Accurate Visual Representations

1.1.1 The views within this study have been created as Accurate Visual Representations (AVRs) using a consistent methodology and approach to rendering. Appendix D of the London View Management Framework: Revised Supplementary Planning Guidance (March 2012), and defines an AVR as:

*"An AVR is a static or moving image which shows the location of a proposed development as accurately as possible; it may also illustrate the degree to which the development will be visible, its detailed form or the proposed use of materials. An AVR must be prepared following a well-defined and verifiable procedure and can therefore be relied upon by assessors to represent fairly the selected visual properties of a proposed development. AVRs are produced by accurately combining images of the proposed building (typically created from a three-dimensional computer model) with a representation of its context; this usually being a photograph, a video sequence, or an image created from a second computer model built from survey data. AVRs can be presented in a number of different ways, as either still or moving images, in a variety of digital or printed formats."*

1.1.2 The existing scene is captured using carefully taken large format photography. The proposed development is represented as an accurate photomontage, a computer generated image placed within the baseline photograph.

1.1.3 In producing this AVR study the following has been determined.

- The Field of View
- Proposed Development Representation
- AVR Documentation



## 1.2 The Field of View

- 1.2.1 The Field of View is captured using a choice of telephoto, standard or wide-angle lens based on the requirements for assessment, which may vary from view to view.
- 1.2.2 For the most part a lens selection that provides a comfortable Viewing Distance is required. Photographers refer to this as a “standard” or “normal” lens. In practice this means the use of a lens with a 35mm equivalent focal length of between about 40 and 58 mm.
- 1.2.3 There are three situations where constraining the study to a standard lens would not provide the assessor with the relevant information to properly assess the Proposed Development in its surroundings.
- 1.2.4 Firstly, where the relationship being assessed is distant, the observer would tend naturally to focus closely on it. At this point the observer might be studying as little as 5 to 10 degrees in plan. The printing technology and image resolution of a print limit the amount of detail that can be resolved on paper when compared to the real world, hence in this situation it is appropriate to make use of a telephoto lens.
- 1.2.5 Secondly, where the wider context of the view must be considered and in making the assessment a viewer would naturally make use of peripheral vision in order to understand the whole setting. A print has a fixed extent, which constrains the angle of view available to the viewer, and hence it is logical to use a wide-angle lens in these situations in order to include additional context in the print.
- 1.2.6 Thirdly where the viewing point is studied at rest and the eye is free to roam over a very wide field of view and the whole setting of the view can be examined by turning the head. In these situations it is appropriate to provide a panorama comprising of a number of photographs placed side by side.
- 1.2.7 For some views two of these scenarios might be appropriate, and hence the study may include two versions of the same view with different fields of view.

## 1.3 Proposed Development Representation - AVR Classification

- 1.3.1 AVRs are classified according to their purpose using Levels 0 to 4. These are defined in detail in Appendix C of the London View Management Framework: Supplementary Planning Guidance (March 2012)).
- AVR Level 0 - Location and size of proposal
  - AVR Level 1 - Location, size and degree of visibility of proposal
  - AVR Level 2 - As level 1 + description of architectural form
  - AVR Level 3 - As level 2 + use of materials
- 1.3.2 In practice the majority of photography based AVRs are either AVR 3 (commonly referred to as “fully rendered” or “photoreal”) or AVR 1 (commonly referred to as “wire-line”).
- 1.3.3 The purpose of a wire-line view is to accurately indicate the location and degree of visibility of the Proposed Development in the context of the existing condition and potentially in the context of other proposed schemes.
- 1.3.4 Level 1 AVRs use a single line profile to indicate the profile of a scheme. Key edges lines are sometimes added to help understand the massing. The width of the profile line is selected to ensure that the diagram is clear, and is always drawn inside the true profile. Different coloured lines may be used in order to distinguish between proposed and consented status, or between different schemes. Where more than one scheme is represented in outline form the outlines will obscure each other as if the schemes were opaque. Trees or other foliage will not obscure the outline of schemes behind them. This is because the transparency of trees varies with the seasons, and the practical difficulties of representing a solid line behind a filigree of branches. Elements of a temporary nature (e.g. cars, tower cranes, people) will similarly not obscure the outlines.
- 1.3.5 Level 3 AVRs are produced to represent the likely appearance of the Proposed Development under the lighting conditions found in the photograph. A detailed 3D model is created to show the geometry, materiality and the size and shape of shadows cast by the sun.
- 1.3.6 Where the Proposed Development is shown at night-time, the lightness of the scheme and the treatment of the materials are best judged by the visualiser given the intended lighting strategy and the ambient lighting conditions in the background photograph. The exact lighting levels are not based on photometric calculations and therefore the resulting AVRs are assessed by the Architect and Lighting Designer as being a reasonable interpretation of the concept lighting strategy.

## 1.4 AVR Documentation

- 1.4.1 An overall plan showing the location and view number for each view is included at the beginning of this study. The site boundary for the proposal is highlighted.
- 1.4.2 For each of the views within this study the existing baseline photography is followed by the Proposed Development AVR.
- 1.4.3 The existing view is accompanied by a plan view showing the location and direction of the baseline photograph.
- 1.4.4 Text indicates the Northings and Eastings and height above Newlyn Datum for the camera position. Date and time of day for the image is also shown.
- 1.4.5 The rationale behind why some AVRs are fully rendered and some are wireline is based on the distance from the site; the identified sensitivity of the view; and whether the inter-visibility between the site and the viewpoint is prevented by built form or vegetation.
- 1.4.6 For AVR 1 wirelines, where permanent structures, trees and foliage and or other temporary obstacles obscure the Proposed Development a dashed line indicates its position. Where the Proposed Development is visible the scheme is shown with a solid line. Key lines may be added to assist the viewer with form.
- 1.4.7 Crop marks in the border around each photograph allow the view to be precisely cropped to a 50mm lens. The photography is captured at a sufficient resolution such that an image cropped to a 50mm lens will print to a reasonable level of detail and without distortion for on-site assessment. For mid to distant views Assael Visuals recommend a 50mm cropped image printed to A4 and held at arms length and adjusted to match the surrounding context. For close proximity views larger prints can be provided. With large developments at close proximity, it is not always possible to capture the entire extent of the proposal within a single frame.
- 1.4.8 Lens shift is indicated with arrows in the border. In some instances where the view has been shifted vertically to include architectural features and or relevant surrounding context, it may result in a portion of the 50mm crop being dropped from the bottom of the frame. In these instances care is taken to ensure where possible that the proposal is kept within the cropped zone.
- 1.4.9 An Individual reference number is added to the bottom right hand corner of each AVR and its corresponding existing baseline image. The reference number is broken down as follows, project number, existing or date of model in view, virtual camera number and revision number (specific to the dated model).



# Methodology Statement

## 1.5 Overview of Methodology

- 1.5.1 This study was carried out by Assael Visuals by combining computer generated images of the Proposed Development with large format photographs at key strategic locations around the site as agreed with the project team.
- 1.5.2 The methodology employed by Assael Visuals is compliant with Appendix D of the London View Management Framework: Revised Supplementary Planning Guidance (March 2012), and follows guidance, where relevant to this urban context, from the Landscape Institute Technical Guidance Note 06/19 for Visual Representation of Development Proposals (17 September 2019).
- 1.5.3 The project team, in consultation with the Local Authority, defined a series of locations where the proposed building might have a significant visual effect. Once the project team had agreed the exact locations, a photograph was taken which formed the basis of the study. The surveyor established the precise location of the camera.
- 1.5.4 A number of features on existing structures visible from the camera location were surveyed. Using these points, Assael Visuals has determined the appropriate parameters to permit a view of the computer model to be generated which exactly overlays the appropriate photograph.
- 1.5.5 Each photograph has then been divided into fore-ground and background elements to determine which parts of the current context should be shown in front of the Proposed Development and which behind. When combined with the computer-generated image these give an accurate impression of the impact of the Proposed Development on the selected view in terms of scale, location and use of materials (AVR Level 3).

### Spatial framework

- 1.5.6 Northings and Eastings based on OSGB36 (National Grid) reference framework have been assembled into a consistent spatial framework, expressed in a grid coordinate system with a local plan origin. The vertical datum of this framework is equivalent to Ordnance Survey (OS) Newlyn Datum.
- 1.5.7 In this study Vectorworks was used by the Architects to produce the model. An FBX is supplied and imported into 3ds Max. The imported FBX files are positioned accurately both in plan and in overall height in accordance with the spatial framework using information provided by the Architects.

### Photographic Process

- 1.5.8 From each selected Assessment Point a series of large format photographs were taken with a camera height of 1.6m
- 1.5.9 Consideration was taken for the selection of lens taking townscape context and proximity to site into account for each of the viewpoint locations. In this study all viewpoints have been photographed using a 24mm lens in order to capture the proposal within its urban setting.
- 1.5.10 The baseline photography for this project was taken in accordance with the current London View Management Framework, prior to the Landscape Institute Technical Guidance Note 06/19 for Visual Representation of Development Proposals (17 September 2019). For distant views both original 24mm images and cropped 50mm images have been provided.

- 1.5.11 Camera settings were set to manual to ensure the photography was captured correctly and without any auto adjustments.
- 1.5.12 The centre point of the tripod was marked and a digital photograph showing the camera and tripod in situ was taken to allow the surveyor to return to its location.
- 1.5.13 Measurements and field notes were also taken to record the camera location, lens used, target point, date, time of day, and overhead conditions.

### Surveying Points

- 1.5.14 For each selected Assessment Point a survey brief was prepared, consisting of the Assessment Point study sheet and a marked up photograph indicating alignment points to be surveyed. Care was taken to ensure that a good spread of alignment points was selected, including points close to the camera and close to the target.

### Murphy Surveys executed surveying

- 1.5.15 The first step at each location was to locate a viewpoint and then another point was installed to create a baseline for the survey. Each point was captured utilising GPS RTK method to ensure all data is in the same coordinate system – OSGB36(15). This was always carried out as a set of two 180 second measurements separated by 20-minute interval as per RICS guidance. This method ensures accuracy of 10-20mm in position and 15-30mm at height. The maximum standard deviations from RTK survey for viewpoints at Manor Road, Richmond were, 7mm Northings, 4mm Eastings, and 10mm Height.
- 1.5.16 The survey of required details was then carried out utilising the established survey baseline to position the data. The required details were observed with the total station via reflectorless laser observations.
- 1.5.17 All survey data was then imported and analysed within dedicated, survey processing software (StarNet) to calculate a final coordinate solution for each control point. Due to size of the site the survey was computed with the application of OS scale factor.
- 1.5.18 All survey data was then imported and analysed within dedicated, survey processing software (StarNet) to calculate a final coordinate solution for each control point. Due to size of the site the survey was computed with the application of OS scale factor.
- 1.5.19 The surveyor amalgamated the resulting survey points into a single data set. This data set was supplied as a spreadsheet with a set of coordinates transformed and re-projected into OSGB36 (National Grid) coordinates.
- 1.5.20 This data was then placed into the spatial framework within the visualisation software and crosshairs attached to each point as a visual aid for the visualiser.

### Photograph Preparation

- 1.5.21 From the set of photographs taken from each assessment point, one single photograph was selected for use in the study. This choice was made on the combination of sharpness, exposure and appropriate lighting.
- 1.5.22 The selected photograph was then corrected to remove any barrel distortion from the lens using lens correction software.

### Photographic Alignment

- 1.5.23 A virtual camera was created within the visualisation system using the surveyed camera location, recorded target point and FOV based on the camera and lens combination selected for the shot .
- 1.5.24 The annotated photograph was attached as a background to this view, to assist the visualiser in aligning the surveyed point cloud to each corresponding background point.
- 1.5.25 Using this virtual camera, a rendering was created of the alignment model at a resolution to match the baseline photograph. This was overlaid onto the baseline photograph to assess the accuracy of the alignment. When using wide-angle lens observations outside the circle of distortion are given less weighting.

### Final Rendering

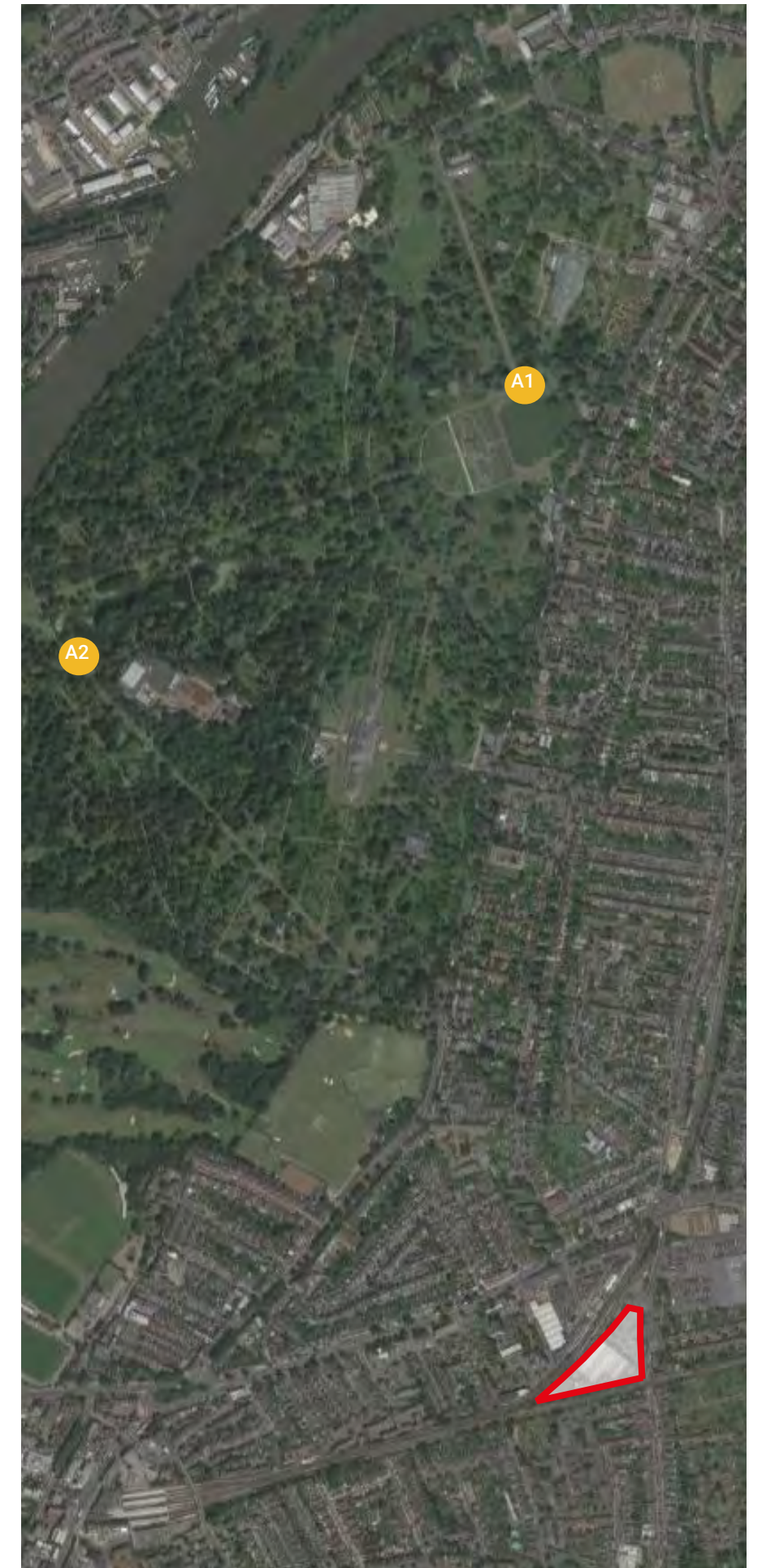
- 1.5.26 The 3D model supplied by the project team is to a level of detail for the AVR type required.
- 1.5.27 Its location within the spatial framework is cross-checked.
- 1.5.28 A context model is placed around the proposed development to generate shadows and assist with determining occlusion in postproduction.
- 1.5.29 Textures and lighting are applied to best represent the materials selected for planning and the lighting conditions shown in the baseline image.
- 1.5.30 As stated previously, where the Proposed Development is shown at night-time, the lightness of the scheme and the treatment of the materials are best judged by the visualiser given the intended lighting strategy and the ambient lighting conditions in the background photograph.
- 1.5.31 The final render is produced to the same resolution as the baseline image. Multi pass renders are also taken to help the visualiser enhance the final render in postproduction. These passes may include a Material ID, Reflection, Refraction, Depth and Ambient Occlusion passes.
- 1.5.32 3ds Max and the Corona render engine was used to produce the computer generated imagery.

### Postproduction

- 1.5.33 The final render is loaded into a template file, which matches the specific camera and lens type used to take the baseline image. This template has an annotated border that shows crop marks for a 50mm lens and arrows to indicate any lens shift
- 1.5.34 Using site photos and 3D context the amount of occlusion for each view is calculated. Areas of the Proposed Development not visible from each viewpoint are then masked out of sight. The scheme is then enhanced using the multi pass renders to bring the final image to a degree of "photo reality" assessed by the project team as being a reasonable interpretation of the proposed development.
- 1.5.35 An individual reference number is added to the bottom right hand corner of each AVR and its corresponding existing baseline image. The reference number is broken down as follows, project number, existing or date of model in view, virtual camera number, and revision number (specific to the dated model).



# Viewpoint Location Maps





# Viewpoint Thumbnails, LI Visualisation Type, and AVR Level of Detail



VP 01 - Manor Grove  
LI - Type 4  
LVMF - AVR Level 1



VP 02 - Manor Road, opposite Townsend Terrace  
LI - Type 4  
LVMF - AVR Level 3



VP 03 - Sheen Road, over Hickey's Almshouses  
LI - Type 4  
LVMF - AVR Level 1



VP 04 - Dee Road  
LI - Type 4  
LVMF - AVR Level 3



VP 05 - Church Road  
LI - Type 4  
LVMF - AVR Level 3



VP 06 - Trinity Road  
LI - Type 4  
LVMF - AVR Level 3



VP 07 - Lower Richmond Road/Manor Road roundabout  
LI - Type 4  
LVMF - AVR Level 3



VP 08 - Sandycombe Road  
LI - Type 4  
LVMF - AVR Level 1



VP 09 - View from Pagoda, Royal Botanic Gardens of Kew  
LI - Type 3  
Not verified



VP 10 - Manor Road, Sainsburys entrance  
LI - Type 4  
LVMF - AVR Level 3



VP 11 - Manor Road, near Manor Grove  
LI - Type 4  
LVMF - AVR Level 3



VP 12 - Crown Terrace  
LI - Type 4  
LVMF - AVR Level 3



VP A1 - Broad Walk, Royal Botanic Gardens of Kew  
LI - Type 4  
LVMF - AVR Level 1

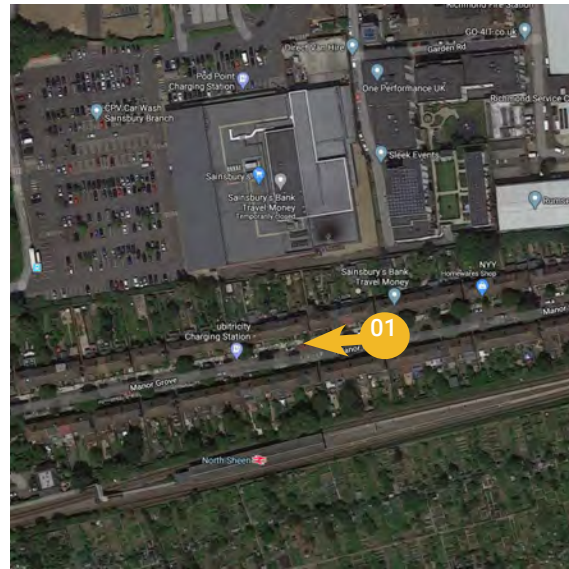


VP A2 - Cedar Vista, Royal Botanic Gardens of Kew  
LI - Type 4  
LVMF - AVR Level 1



# Viewpoint Locations and Photographic Data

VP 01 - Manor Grove



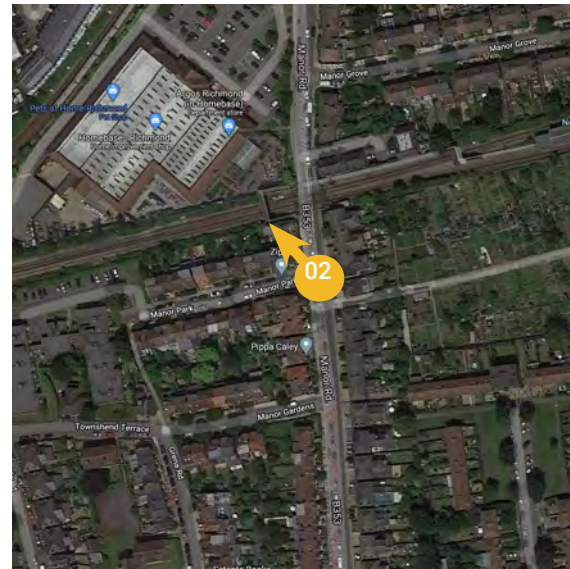
**Camera location**  
 Northing: 175477.978 m  
 Easting: 519121.597 m  
 Height of nail: 6.42 m  
 Camera height : 1.6m above nail  
 Bearing: 269 W  
 Distance to site: 150.93m

**Photography details**  
 Camera: Canon 5DSR  
 Lens: Canon TS-E 24mm  
 Horizontal FOV: 73.682 degrees  
 Projection: Single frame planar

**Date and Time**  
 Date of photograph: 24/07/2018  
 Time of photograph: 14:12



VP 02 - Manor Road, opposite Townsend Terrace



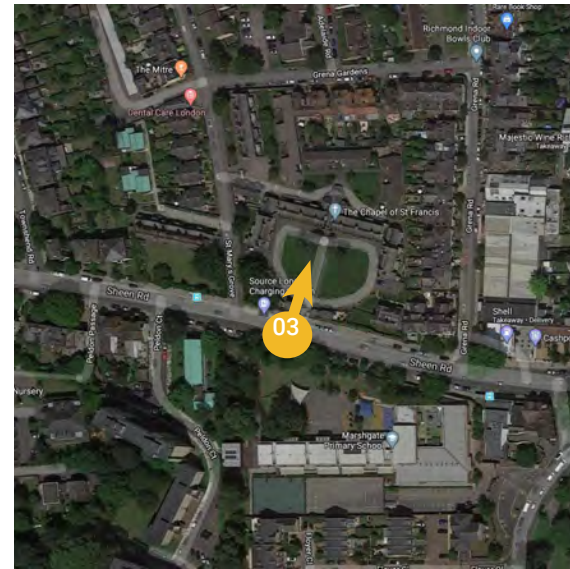
**Camera location**  
 Northing: 175295.485 m  
 Easting: 518999.431 m  
 Height of nail: 7.697 m  
 Camera height : 1.6m above nail  
 Bearing: 340 NW  
 Distance to site: 115.73m

**Photography details**  
 Camera: Canon 5DSR  
 Lens: Canon TS-E 24mm  
 Horizontal FOV: 73.682 degrees  
 Projection: Single frame planar

**Date and Time**  
 Date of photograph: 06/08/2018  
 Time of photograph: 10:00



VP 03 - Sheen Road, over Hickney's Almshouses



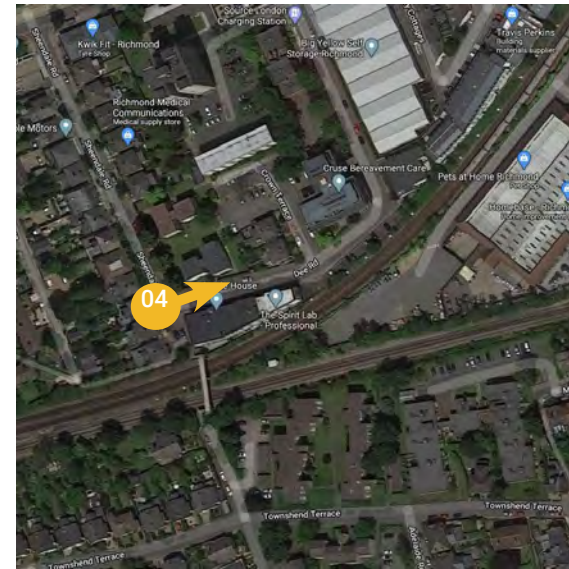
**Camera location**  
 Northing: 175031.808 m  
 Easting: 518868.567 m  
 Height of nail: 10.99 m  
 Camera height : 1.6m above nail  
 Bearing: 12 NNE  
 Distance to site: 324.1m

**Photography details**  
 Camera: Canon 5DSR  
 Lens: Canon TS-E 24mm  
 Horizontal FOV: 73.682 degrees  
 Projection: Single frame planar

**Date and Time**  
 Date of photograph: 24/07/2018  
 Time of photograph: 13:43



VP 04 - Dee Road



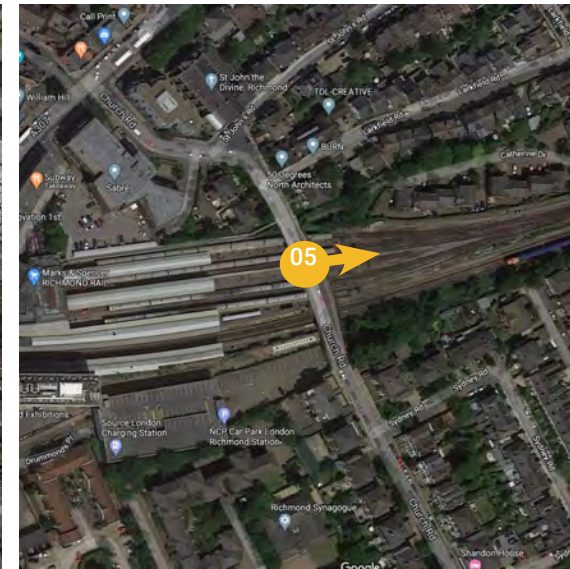
**Camera location**  
 Northing: 175370.406 m  
 Easting: 518716.089 m  
 Height of nail: 6.581 m  
 Camera height : 1.6m above nail  
 Bearing: 69.5 NE  
 Distance to site: 104.95m

**Photography details**  
 Camera: Canon 5DSR  
 Lens: Canon TS-E 24mm  
 Horizontal FOV: 73.682 degrees  
 Projection: Single frame planar

**Date and Time**  
 Date of photograph: 24/07/2018  
 Time of photograph: 10:54



VP 05 - Church Road



**Camera location**  
 Northing: 175180.109 m  
 Easting: 518232.544 m  
 Height of nail: 10.454 m  
 Camera height : 1.6m above nail  
 Bearing: 69.2 NE  
 Distance to site: 626m

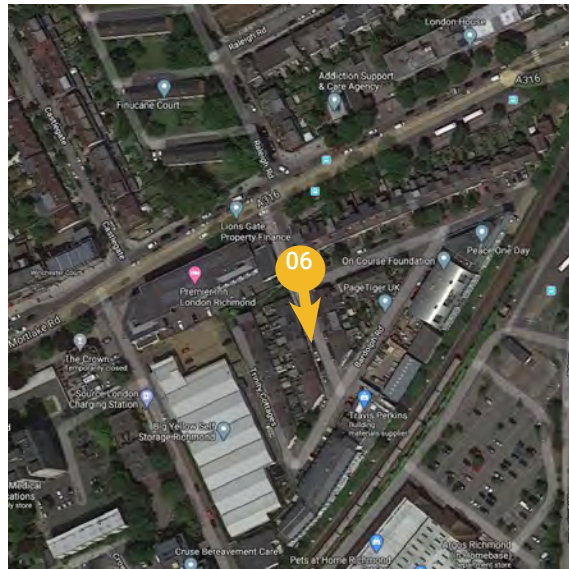
**Photography details**  
 Camera: Canon 5DSR  
 Lens: Canon TS-E 24mm  
 Horizontal FOV: 73.682 degrees  
 Projection: Single frame planar

**Date and Time**  
 Date of photograph: 24/07/2018  
 Time of photograph: 15:31





VP 06 - Trinity Road



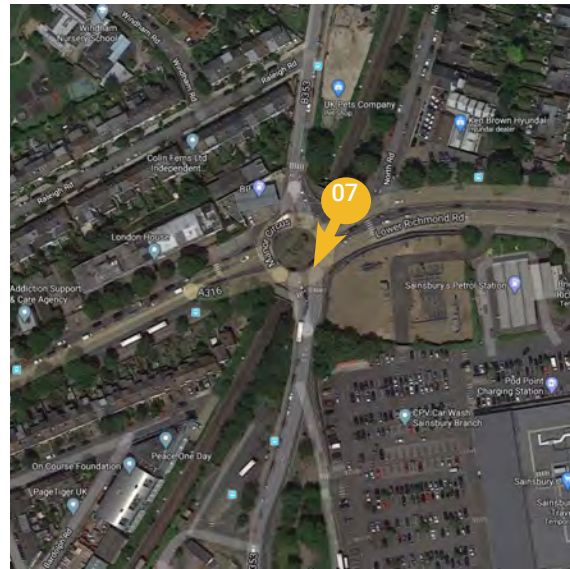
Camera location  
 Northing: 175571.836 m  
 Easting: 518848.184 m  
 Height of nail: 6.383 m  
 Camera height : 1.6m above nail  
 Bearing: 162 SSE  
 Distance to site: 72.9m

Photography details  
 Camera: Canon 5DSR  
 Lens: Canon TS-E 24mm  
 Horizontal FOV: 73.682 degrees  
 Projection: Single frame planar

Date and Time  
 Date of photograph: 24/07/2018  
 Time of photograph: 11:08



VP 07 - Lower Richmond Road/Manor Road roundabout



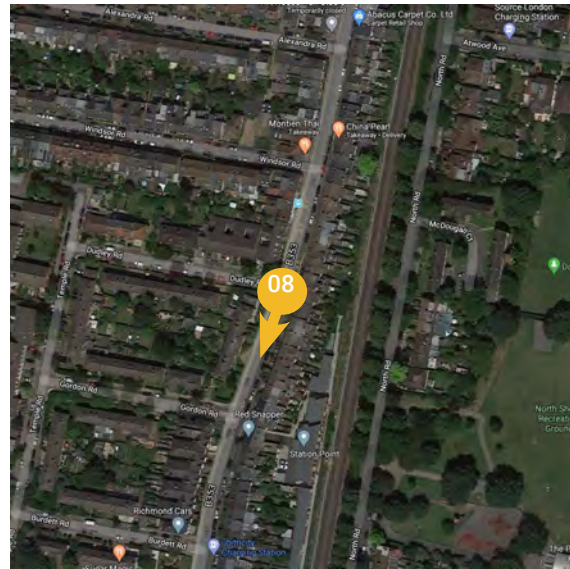
Camera location  
 Northing: 175712.013 m  
 Easting: 519023.444 m  
 Height of nail: 10.47 m  
 Camera height : 1.6m above nail  
 Bearing: 205 SSW  
 Distance to site: 184.95m

Photography details  
 Camera: Canon 5DSR  
 Lens: Canon TS-E 24mm  
 Horizontal FOV: 73.682 degrees  
 Projection: Single frame planar

Date and Time  
 Date of photograph: 24/07/2018  
 Time of photograph: 11:55



VP 08 - Sandycombe Road



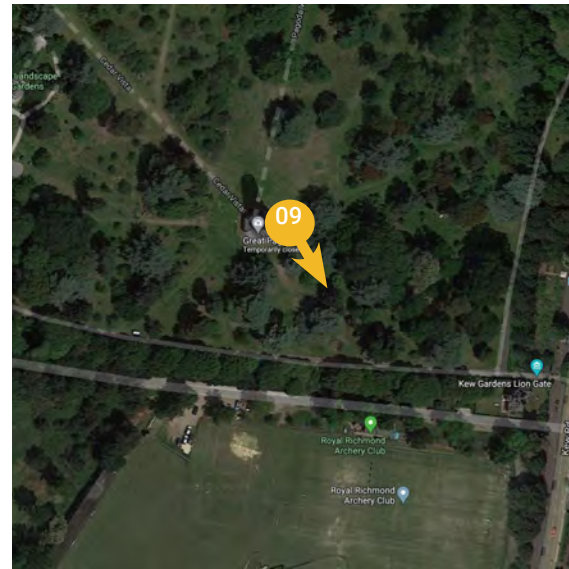
Camera location  
 Northing: 176119.516 m  
 Easting: 519060.534 m  
 Height of nail: 6.512 m  
 Camera height : 1.6m above nail  
 Bearing: 201 SSW  
 Distance to site: 579.2m

Photography details  
 Camera: Canon 5DSR  
 Lens: Canon TS-E 24mm  
 Horizontal FOV: 73.682 degrees  
 Projection: Single frame planar

Date and Time  
 Date of photograph: 24/07/2018  
 Time of photograph: 12:09



VP 09 - View from Pagoda, Royal Botanic Gardens of Kew



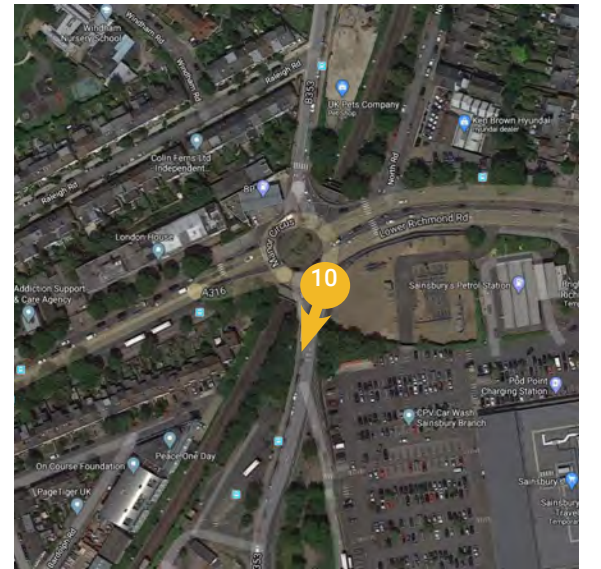
Camera location  
 Northing: Not Verified  
 Easting: Not Verified  
 Height of nail: Not Verified  
 Camera height : Not Verified  
 Bearing: 152 SE  
 Distance to site: 703m

Photography details  
 Camera: Canon 5DSR  
 Lens: Canon TS-E 24mm  
 Horizontal FOV: 73.682 degrees  
 Projection: Single frame planar

Date and Time  
 Date of photograph: 26/07/2018  
 Time of photograph: 10:48



VP 10 - Manor Road, Sainsbury's entrance



Camera location  
 Northing: 175661.256 m  
 Easting: 519006.195 m  
 Height of nail: 10.731 m  
 Camera height : 1.6m above nail  
 Bearing: 205 SSW  
 Distance to site: 130.8m

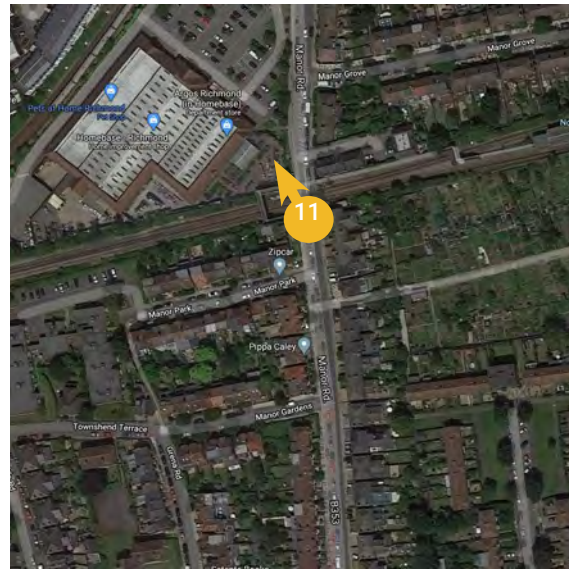
Photography details  
 Camera: Canon 5DSR  
 Lens: Canon TS-E 24mm  
 Horizontal FOV: 73.682 degrees  
 Projection: Single frame planar

Date and Time  
 Date of photograph: 02/11/2019  
 Time of photograph: 10:41





VP 11 - Manor Road, near Manor Grove



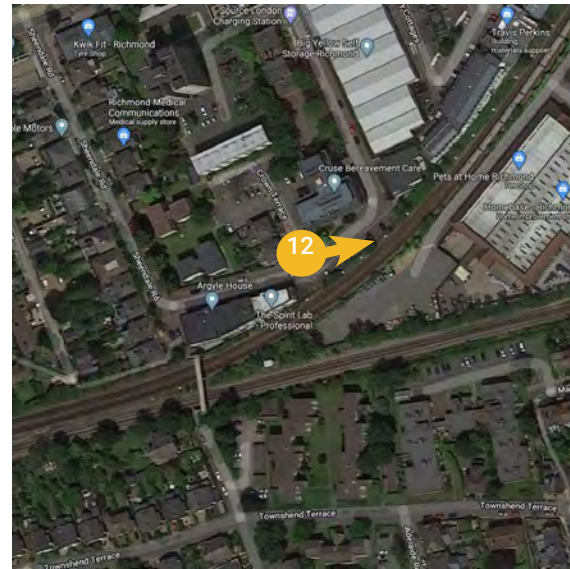
**Camera location**  
 Northing: 175397.355 m  
 Easting: 518780.8594 m  
 Height of nail: 6.2541 m  
 Camera height : 1.6m above nail  
 Bearing: 327 NNW  
 Distance to site: 37.05m

**Photography details**  
 Camera: Canon 5DSR  
 Lens: Canon TS-E 24mm  
 Horizontal FOV: 73.682 degrees  
 Projection: Single frame planar

**Date and Time**  
 Date of photograph: 08/11/2018  
 Time of photograph: 13:03



VP 12 - Crown Terrace



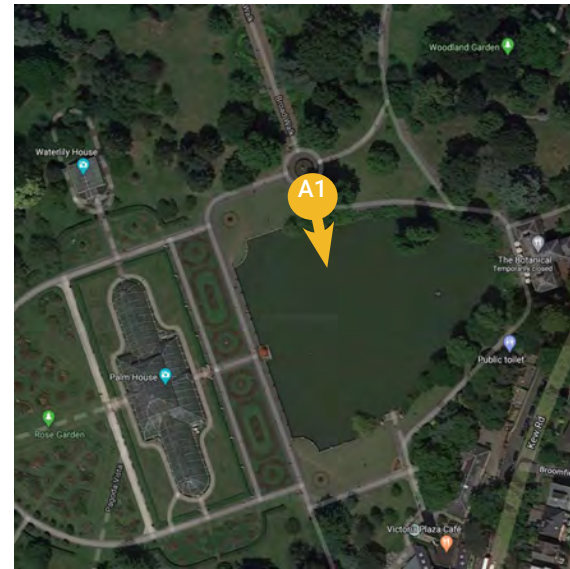
**Camera location**  
 Northing: 175376.3648 m  
 Easting: 518987.8452 m  
 Height of nail: 7.3244 m  
 Camera height : 1.6m above nail  
 Bearing: 42.29m  
 Distance to site: 85 E

**Photography details**  
 Camera: Canon 5DSR  
 Lens: Canon TS-E 24mm  
 Horizontal FOV: 73.682 degrees  
 Projection: Single frame planar

**Date and Time**  
 Date of photograph: 21/01/2019  
 Time of photograph: 13:57



VP A1 - Broad Walk, Royal Botanic Gardens of Kew



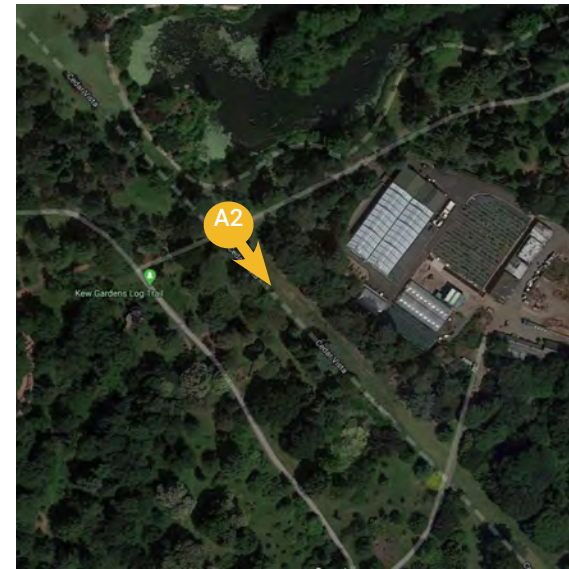
**Camera location**  
 Northing: 177041.7224 m  
 Easting: 518728.8418 m  
 Height of nail: 5.5921 m  
 Camera height : 1.6m above nail  
 Bearing: 175 S  
 Distance to site: 1515m

**Photography details**  
 Camera: Canon 5DSR  
 Lens: Canon TS-E 24mm  
 Horizontal FOV: 73.682 degrees  
 Projection: Single frame planar

**Date and Time**  
 Date of photograph: 30/04/2019  
 Time of photograph: 13:19



VP A2 - Cedar Vista, Royal Botanic Gardens of Kew



**Camera location**  
 Northing: 176555.4879 m  
 Easting: 518011.2127 m  
 Height of nail: 5.3106 m  
 Camera height : 1.6m above nail  
 Bearing: 136 SE  
 Distance to site: 1377m

**Photography details**  
 Camera: Canon 5DSR  
 Lens: Canon TS-E 24mm  
 Horizontal FOV: 73.682 degrees  
 Projection: Single frame planar

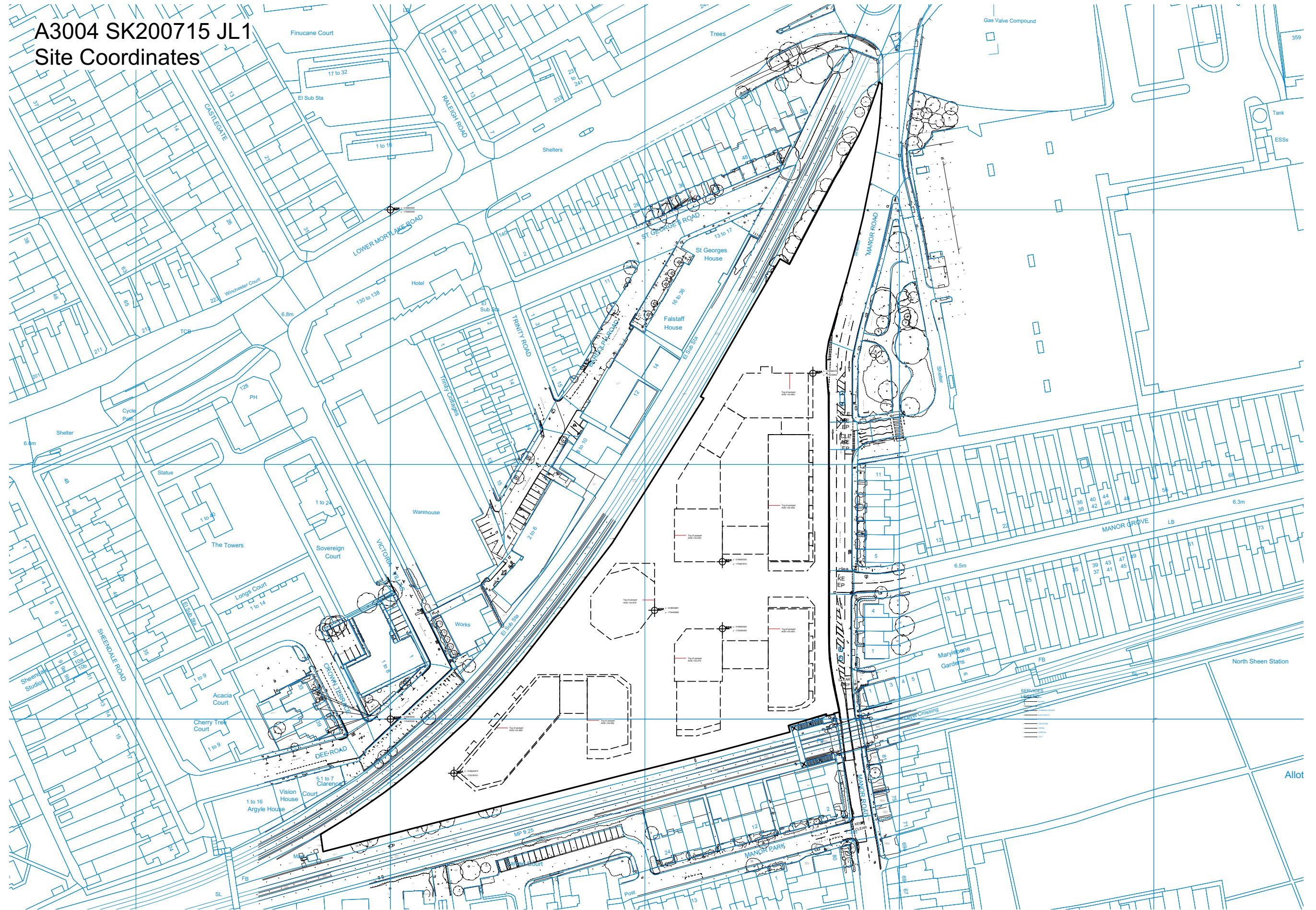
**Date and Time**  
 Date of photograph: 30/04/2019  
 Time of photograph: 14:01





# Proposed Development Coordinates

A3004 SK200715 JL1  
Site Coordinates





# APPENDIX C REPRESENTATIVE VIEWS (3, 5, 8, 9, A1 AND A2 CROPPED TO 50MM)



Representative view 3 - Proposed Situation (Amended Proposed Development) A3 with A4 crop marks





Representative view 5 - Proposed Situation (Amended Proposed Development) A3 with A4 crop marks





Representative view 8 - Proposed Situation (Amended Proposed Development) A3 with A4 crop marks





Representative view 9 - Proposed Situation (Amended Proposed Development) A3 with A4 crop marks





Representative view A1 - Proposed Situation (Amended Proposed Development) A3 with A4 crop marks





Representative view A2 - Proposed Situation (Amended Proposed Development) A3 with A4 crop marks



The logo for ARC, consisting of the lowercase letters 'arc' in a bold, blue, sans-serif font. The background features abstract, curved lines in light blue and green that sweep across the left side of the page.

arc

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## **Appendix II**

Greater London Authority Hearing Report  
(Homebase, Manor Road, October 2020)



## Homebase, 84 Manor Road

in the London Borough of Richmond

planning application no. 19/0510/FUL

### Planning application

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008 ("the Order")

### The proposal

Demolition of existing buildings and structures and comprehensive phased residential-led redevelopment to provide 453 residential units (173 affordable), flexible retail, community and office uses, provision of car and cycle parking, landscaping, public and private open spaces and all other necessary enabling works.

### The applicant

The applicant is **Avanton Richmond Developments Limited** and the architect is **Assael**.

### Recommendation

The Mayor, acting as Local Planning Authority for the purpose of determining this application;

- i. grants conditional planning permission in respect of application 19/0510/FUL for the reasons set out in the reasons for approval section below, and subject to the prior completion of a section 106 legal agreement;
- ii. delegates authority to the Head of Development Management to:
  - a. agree the final wording of the conditions and informatives as approved by the Mayor; with any material changes being referred back to the Mayor;
  - b. negotiate and complete the section 106 legal agreement;
  - c. issue the planning permission (subject to the lifting of the Holding Direction).
- iii. delegates authority to the Head of Development Management and Assistant Director of Planning to agree any variations to the proposed Section 106 legal agreement;
- iv. delegates authority to the Head of Development Management and Assistant Director of Planning to refer it back to the Mayor in order to refuse planning permission, if by 8 January 2021, the Section 106 legal agreement has not been completed;
- v. notes that approval of details pursuant to conditions imposed on the planning permission would be submitted to, and determined by Richmond Council; and
- vi. notes that Richmond Council would be responsible for the enforcement of the conditions attached to the planning permission.

## Drawing numbers and documents

<b>Existing plans</b>	
Existing site location plan: MNR AA ALL ZZ DR A 1000 R2	
Existing site block plan: MNR AA ALL ZZ DR A 1100 R2	
Existing ground floor plan: MNR AA ALL GF DR A 1200 R2	
Existing mezzanine plan: MNR AA ALL M1 DR A 1201 R2	
Existing sections: MNR AA ALL ZZ DR A 1300 R2	
Existing elevations: MNR AA ALL ZZ DR A 1400 R2	
Existing bus layover facility: MNR-AA-ALL-ZZ-DR-A-1600 R1	
<b>Demolition plans</b>	
Site plan demolition drawing: MNR AA ALL ZZ DR A 1500 R2	
Ground floor existing demolition drawing: MNR AA ALL GF DR A 1501 R2	
Mezzanine floor existing demolition drawing: MNR AA ALL M1 DR A 1502 R2	
Sections existing demolition drawing: MNR AA ALL ZZ DR A 1503 R2	
Elevations existing demolition drawing: MNR AA ALL ZZ DR A 1504 R2	
<b>Proposed drawings</b>	
<b><i>General arrangement plans</i></b>	
Basement plan	MNR AA ALL B1 DR A 1999 R13
Ground floor plan	MNR AA ALL GF DR A 2000 R21
First floor plan	MNR AA ALL 01 DR A 2001 R18
Second floor plan	MNR AA ALL 02 DR A 2002 R15
Third floor plan	MNR AA ALL 03 DR A 2003 R15
Fourth floor plan	MNR AA ALL 04 DR A 2004 R15
Fifth floor plan	MNR AA ALL 05 DR A 2005 R15
Sixth floor plan	MNR AA ALL 06 DR A 2006 R15
Seventh floor plan	MNR AA ALL 07 DR A 2007 R15
Eighth floor plan	MNR AA ALL 08 DR A 2008 R14
Ninth floor plan	MNR AA ALL 09 DR A 2009 R14

Tenth floor plan	MNR AA ALL 10 DR A 2010 R4
Roof plan	MNR AA ALL 11 DR A 2011 R18
Phasing plan	MNR-AA-ALL-GF-DR-A-2100 R2
Affordable housing plan	MNR-AA-ALL-10-DR-A-2110 R4
<b>Proposed drawings</b>	
<b><i>Floor plans</i></b>	
<b><i>Block A</i></b>	
Core A – Ground floor plan	MNR AA BA1 01 DR A 2100 R11
Core A – First floor plan	MNR AA BA1 01 DR A 2101 R10
Core A – Second floor plan	MNR AA BA1 01 DR A 2102 R10
Core A – Third floor plan	MNR AA BA1 01 DR A 2103 R10
Core A – Fourth floor plan	MNR AA BA1 01 DR A 2104 R10
Core A – Fifth floor plan	MNR AA BA1 01 DR A 2105 R10
Core A – Sixth floor plan	MNR AA BA1 01 DR A 2106 R10
Core A – Seventh floor plan	MNR AA BA1 01 DR A 2107 R10
Core A – Roof plan	MNR AA BA1 01 DR A 2108 R1
Cores B, C, D – Basement plan	MNR AA BA2 B DR A 2199 R11
Cores B, C, D – Ground floor plan	MNR AA BA2 01 DR A 2200 R11
Cores B, C, D – First floor plan	MNR AA BA2 01 DR A 2201 R10
Cores B, C, D – Second floor plan	MNR AA BA2 02 DR A 2202 R10
Cores B, C, D – Third floor plan	MNR AA BA2 03 DR A 2203 R10
Cores B, C, D – Fourth floor plan	MNR AA BA2 04 DR A 2204 R10
Cores B, C, D – Fifth floor plan	MNR AA BA2 05 DR A 2205 R10
Cores B, C, D – Sixth floor plan	MNR AA BA2 06 DR A 2206 R10
Cores B, C, D – Seventh floor plan	MNR AA BA2 07 DR A 2207 R10
Cores B, C, D – Eighth floor plan	MNR AA BA2 07 DR A 2208 R10
<b><i>Block B</i></b>	
Core A – Ground floor plan	MNR AA BB1 GF DR A 2300 R10



Core A – First floor plan	MNR AA BB1 01 DR A 2301 R10
Core A – Second floor plan	MNR AA BB1 02 DR A 2302 R10
Core A – Third floor plan	MNR AA BB1 03 DR A 2303 R10
Core A – Fourth floor plan	MNR AA BB1 04 DR A 2304 R10
Core A – Fifth floor plan	MNR AA BB1 05 DR A 2305 R10
Core A – Sixth floor plan	MNR AA BB1 06 DR A 2306 R10
Core A – Seventh floor plan	MNR AA BB1 07 DR A 2307 R10
Core A – Eighth floor plan	MNR AA BB1 08 DR A 2308 R10
Core A – Ninth floor plan	MNR AA BB1 09 DR A 2309 R10
Core A – Tenth floor plan	MNR AA BB1 10 DR A 2310 R10
Core A – Roof plan	MNR AA BB1 11 DR A 2311 R2
<b>Block C</b>	
Cores A & B – Ground floor plan	MNR AA BC1 GF DR A 2400 R10
Cores A & B – First floor plan	MNR AA BC1 01 DR A 2401 R10
Cores A & B – Second floor plan	MNR AA BC1 02 DR A 2402 R9
Cores A & B – Third floor plan	MNR AA BC1 03 DR A 2403 R10
Cores A & B – Fourth floor plan	MNR AA BC1 04 DR A 2404 R10
Cores A & B – Fifth floor plan	MNR AA BC1 05 DR A 2405 R10
Cores A & B – Sixth floor plan	MNR AA BC1 06 DR A 2406 R10
Cores A & B – Seventh floor plan	MNR AA BC1 07 DR A 2407 R10
Cores A & B – Eighth floor plan	MNR AA BC1 08 DR A 2408 R10
Cores A & B – Ninth floor plan	MNR AA BC1 09 DR A 2409 R2
Cores A & B – Roof plan	MNR AA BC1 10 DR A 2410 R2
<b>Block D</b>	
Cores A & B – Ground floor plan	MNR AA BD1 GF DR A 2500 R11
Cores A & B – First floor plan	MNR AA BD1 01 DR A 2501 R10
Cores A & B – Second floor plan	MNR AA BD1 02 DR A 2502 R10
Cores A & B – Third floor plan	MNR AA BD1 03 DR A 2503 R10

Cores A & B – Fourth floor plan	MNR AA BD1 04 DR A 2504 R10
Cores A & B – Fifth floor plan	MNR AA BD1 05 DR A 2505 R10
Cores A & B – Sixth floor plan	MNR AA BD1 06 DR A 2506 R10
Cores A & B – Seventh floor plan	MNR AA BD1 07 DR A 2507 R10
Cores A & B – Roof plan	MNR AA BD1 08 DR A 2508 R10
<b><i>Elevations and sections</i></b>	
Proposed site sections	MNR AA ALL ZZ DR A 3000 R5
Elevation AA – Manor Road	MNR AA ALL ZZ DR A 4000 R3
Block A elevations	MNR AA BLA ZZ DR A 4100 R6
Block A elevations	MNR AA BLA ZZ DR A 4101 R6
Block A elevations	MNR AA BLA ZZ DR A 4102 R7
Block A elevations	MNR AA BLA ZZ DR A 4103 R6
Block A elevations	MNR AA BLA ZZ DR A 4104 R6
Block A elevations	MNR AA BLA ZZ DR A 4105 R6
Block A elevations	MNR AA BLA ZZ DR A 4106 R5
Block A elevations	MNR AA BLA ZZ DR A 4107 R5
Block B elevations	MNR AA BLB ZZ DR A 4200 R6
Block B elevations	MNR AA BLB ZZ DR A 4201 R6
Block B elevations	MNR AA BLB ZZ DR A 4202 R6
Block B elevations	MNR AA BLB ZZ DR A 4203 R6
Block C elevations	MNR AA BLC ZZ DR A 4300 R6
Block C elevations	MNR AA BLC ZZ DR A 4301 R6
Block C elevations	MNR AA BLC ZZ DR A 4302 R6
Block C elevations	MNR AA BLC ZZ DR A 4303 R6
Block C elevations	MNR AA BLC ZZ DR A 4304 R5
Block C elevations	MNR AA BLC ZZ DR A 4305 R5
Block D elevations	MNR AA BLD ZZ DR A 4400 R5
Block D elevations	MNR AA BLD ZZ DR A 4401 R6

Block D elevations	MNR AA BLD ZZ DR A 4402 R5
Block D elevations	MNR AA BLD ZZ DR A 4403 R5
Block D elevations	MNR AA BLD ZZ DR A 4404 R5
Block D elevations	MNR AA BLD ZZ DR A 4405 R4
<b><i>Landscape drawings</i></b>	
Landscape general arrangement	P11559-00-001-100-08
Landscape roof plan	P11559-00-001-101-04
Typical tree pit details	P11559-00-001-400-02
<b>Supporting documents</b>	
<b><i>Original application</i></b>	
Design and Access Statement (February 2019)	
Heritage Statement (February 2019)	
Townscape and Visual Impact Appraisal (February 2019)	
Townscape and Visual Impact Appraisal Addendum V2 (May 2019)	
Arboricultural Appraisal and Implications Assessment (November 2019)	
Waste Management Strategy Addendum (November 2019)	
Health Impact Assessment (May 2019)	
<b><i>Additional and revised documents for representation hearing (July 2020)</i></b>	
Area Schedule: Proposed amended development	
Revised Geoenvironmental & Geotechnical Preliminary Risk Assessment	
Design and Access Statement Architectural Addendum	
Design and Access Statement Landscaping Addendum	
Revised Flood Risk Assessment and Drainage Strategy	
Arboricultural Appraisal and Implications Assessment Addendum	
Revised Circular Economy Statement	
Revised Construction Environmental Management Plan	
Health Impact Assessment Addendum	
Heritage Statement Addendum	



Revised Daylight Sunlight Report
Planning Statement Addendum
Revised Air Quality Assessment
Revised Commercial Travel Plan
Revised Energy Strategy
Revised Fire Safety Statement
Revised Lighting Design Strategy
Revised Noise Vibration Impact Assessment
Revised Preliminary Risk Assessment
Revised Residential Travel Plan
Revised Servicing and Delivery Management Plan
Revised Sustainability Strategy
Revised Transport Assessment
Revised Utilities Statement
Revised Waste Management Strategy Addendum
Revised Wind Microclimate Assessment
Townscape and Visual Impact Appraisal Addendum
Whole Life Carbon Assessment

## Introduction

1 Having assumed authority to determine this planning application under his powers in the Mayor of London Order 2008, this report sets out the matters that the Mayor must consider in forming a view over whether to grant or refuse planning permission and to guide his decision making at the upcoming representation hearing. This report includes a recommendation from GLA officers, as set out below.

## Officer recommendation - reasons for approval

2 The Mayor, acting as the local planning authority, has considered the particular circumstances of this application against national, strategic and local planning policy, relevant supplementary planning guidance and all material planning considerations. He has also had regard to Richmond Council's planning committee report dated 3 July 2019, associated addendum, the minutes of that committee setting out six reasons for refusal and all consultation responses and representations made on the case including in respect of the scheme as it has now been revised. The paragraphs below provide a summary of the key reasons why GLA officers consider this application to be acceptable in planning terms:

- I. The development of this accessible, brownfield, under-utilised site; close to a transport interchange; would provide a high density residential-led mixed-use scheme, including appropriate levels of flexible uses, public realm enhancements and contributions towards the consultation and introduction of a Controlled Parking Zone, railway safety, upgrades to North Sheen Station, level crossing improvements, Manor Circus safety scheme, station access feasibility study from North Sheen Station, local area healthcare, and the borough's Carbon Offset Fund. The scheme would make a significant contribution towards housing and affordable housing delivery targets, assisting in meeting local and strategic housing need, both for market and affordable housing. On this basis, the application strongly accords with the NPPF; London Plan Policies 1.1, 2.6, 3.3, 3.11, and 4.7; Intend to Publish London Plan Objectives GG1, GG2, GG3, GG4, GG5, GG6, Policies SD6, D1, D2, and D3; Richmond Local Plan Policies
- II. The scheme would provide 453 residential units, of which 173 would be affordable (40% by habitable room). This would include a policy compliant tenure mix, made up of London Affordable Rent, London Living Rent and London Shared Ownership units. The proposed affordable housing offer meets the requirements of the Mayor's Affordable Housing & Viability SPG and is therefore eligible for the 'Fast Track Route'. An early implementation viability review mechanism will be triggered, should substantial implementation not be achieved within 24 months of planning permission being granted which would allow for an enhanced affordable provision. The affordability levels comply with the London Plan and would be secured by legal agreement. The housing proposed is of a high quality, accessible, and an appropriate density and mix for the location, taking into account the characteristics of the site. On this basis, the application accords with the NPPF; London Plan Policies 3.6, 3.8, 3.9, 3.11, and 3.12; Intend to Publish London Plan Policies H4, H5, H6, H7 and H10; Richmond Local Plan Policy DMH 7; the Mayor's Affordable Housing & Viability SPG (2017); the Mayor's Children and Young People's Play and Informal Recreation SPG (2012).

- III. The design and layout of the proposal is of a high quality, would optimise the development capacity of the site, and would respond appropriately to site constraints without causing undue harm to the amenity of neighbouring properties. While the tall buildings would represent a step change from the site's immediate surrounds, the massing strategy presents a sensitive approach to the site's immediate context and the buildings would provide significant benefits in terms of high-quality architecture, housing, affordable housing, and amenity space; therefore, they are considered acceptable on balance. The proposed density is acceptable given the characteristics of the site, particularly its high level of accessibility, and the proposal has benefitted from extensive design scrutiny which has led to improvements to the layout and form of the proposed buildings, residential units, and public realm. The proposed public realm would be of high quality and represent a significant improvement over the current condition, with increase active frontage along Manor Road and new sections of public realm providing places for existing and future residents to walk, sit, play, and gather. The scheme would provide a high standard of residential quality, including internal and private amenity space, aspect, outlook, privacy, air quality, and noise; and achieve the highest standard of inclusive design. The architectural approach and materials palette are refined and imbued with highly contextual references which would result in a distinctive, cohesive, high-quality scheme that fits appropriately within its urban and general environment. On this basis, the application generally accords with London Plan Policies 3.5, 3.6, 3.8, 3.9, 3.11, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, and 7.8; Intend to Publish London Plan Policies D1, D2, D3, D4, D5, D6, D7, D8, D9, D11, D12, D13, and D14; and Richmond Local Plan Policies LP 1, LP2, LP 8, LP 16, LP 34, LP 35, LP 36, and LP 37.
- IV. The proposed development would not be clearly visible from the Grade II\* Listed Hickey Almshouses; therefore, no harm would be caused to their significance or setting. Whilst the proposal would be visible from atop of the Pagoda within the Kew Royal Botanic Gardens World Heritage Site (WHS) and within the Sheendale Road Conservation Area, it would be viewed within the backdrop of an established urban context which already comprises a number of modern buildings of lesser architectural quality. The proposal would not result in harm to the significance or setting of the Kew WHS or the Sheendale Road Conservation Area. Additionally, the proposal is not within an archaeological priority area and Historic England (archaeology) did not provide any comments on the proposal. For these reasons, the proposal accords with the NPPF; London Plan Policies 7.4, 7.6, 7.7, and 7.8; Intend to Publish London Plan Policies HC1 and HC2; and Richmond Local Plan Policies LP 1, LP 3, LP 4, LP 6, and LP 7.
- V. The proposal has demonstrated that a suitable standard of sustainable design and construction would be achieved, minimising carbon dioxide emissions in line with adopted policy, using energy efficiently and including renewable energy technologies, in accordance with the London Plan energy hierarchy. Although a small number of 'very poor' to 'moderate' quality trees would need to be removed in order to bring the site forward, 24 individual trees and small tree groups would be protected and preserved and 141 new semi-mature trees would be planted resulting in a net uplift of trees on site when compared to the existing condition. The development would also deliver sustainable urban drainage, ecology and urban greening benefits. Appropriate provisions are made for waste storage and collection. Land contamination issues would be appropriately mitigated. As such the scheme complies with Policies within Chapter 5 of the London Plan, and



Policies 7.19 and 7.21; Policies within Chapter 9 of the Mayor's Intend to Publish London Plan, and Policies G2, G5, G6 and G7; the Sustainable Design and Construction SPG, and Richmond Local Plan Policies LP 12, LP 15, LP 16, LP 17, LP 20, LP 21, LP 22, and LP 24.

- VI. The area has a good level of transport infrastructure provision. The proposals would ensure uninterrupted use of the bus layover facility on site as well as securing £625,000 of contributions towards the Manor Circus Improvement Scheme, railway safety, level crossing improvements a station access feasibility study, North Sheen station upgrades, and a Controlled Parking Zone study and amendments (if necessary). The proposed development includes a quantum of cycle parking which exceeds London Plan and Intend to Publish London Plan minimum standards and is car-free, bar fourteen Blue Badge spaces and two electric Car Club spaces. The highways and public transport impacts of the proposals are therefore acceptable. Subject to the transport mitigation measures being secured, the application supports the transport policies in the London Plan, Intend to Publish London Plan, Richmond Local Plan and Mayor's Transport Strategy.
- VII. Appropriate, relevant, reasonable and necessary planning conditions and planning obligations are proposed to ensure that the development is acceptable in planning terms and the environmental, and socio-economic impacts are mitigated, in line with London Plan Policy 8.2 and Intend to Publish London Plan Policy DF1.
- VIII. Accordingly, the proposals are considered to accord with the development plan.

## Section 106 Legal Agreement

- Affordable housing: 173 units (40% of habitable rooms) to be affordable, 52% of which to be London Affordable Rent and 48% to be intermediate (comprising both London Shared Ownership and London Living Rent). Details of affordability (as below), service charges and nominations will be secured.
  - London Affordable Rent: 84 affordable housing units (247 habitable rooms) with rents to be updated annually by the GLA (2020/21 rents: £159.32 weekly for 1-bed, £168.67 weekly for 2-bed, and £178.05 weekly for 3-bed).
  - London Shared Ownership affordability: 34 affordable housing units (101 habitable rooms) with average annual housing costs not to exceed 28 per cent of the relevant annual gross income for households (such 28 per cent being equivalent to 40 per cent of net income) at the following income upper limits stated below:
    - one-bedroom: £55,000;
    - two-bedroom: £71,000;
  - London Living Rent: 55 affordable housing units (129 habitable rooms) at London Living Rent as updated annually by the GLA (2020/21 rents: £1,181 pcm for 1 bed, £ 1,313 pcm for 2 bed), gross annual incomes levels: 1 bed £50,614; 2 bed £56,271.
  - An early stage review mechanism.

- Transport: The following transport related obligations would be secured:
  - Residential and commercial Travel Plans.
  - A car club scheme inclusive of two electric car club bays and three years free membership for residents.
  - Restrictions preventing future residents to apply for permits within a Controlled Parking Zone (CPZ) should one come forward in the future.
  - CPZ consultation contribution of £50,000 towards reviewing and consulting on the introduction of a new Controlled Parking Zone(s) within the vicinity.
  - CPZ implementation contribution of £50,000 in relation to introduction of any CPZ.
  - Railway safety contribution of £15,000 to be paid to the Council for payment onto Network Rail to be applied towards education programmes for the local community.
  - Level crossing improvements contribution of £60,000 towards improvements to the level crossing.
  - Station access feasibility contribution of £30,000 to be paid to the Council towards a feasibility study relating to accessibility improvements to North Sheen mainline railway station.
  - North Sheen station improvements contribution of £40,000 towards improvement to North Sheen mainline railway station.
  - Manor Circus road safety scheme contribution of £380,000 to be paid to TfL to improve pedestrian road safety and the cycling and pedestrian environment.
  - Travel Plan monitoring contribution of £5,000 (commercial) and £5,000 (residential) to be paid to the Council.
  - Bus layover lease – development will not commence until a bus layover lease has been granted.
  - Highway works under s278 agreement.
- Local Employment: A local employment scheme to be submitted and approved in writing by the Council prior to commencement.
- Play space and Public Realm: A offsite play space contribution of £54,154 and maintenance contribution of £10,045 to be paid towards the provision and/or improvement of playspace for 11 to 17-year olds in the vicinity. The s106 agreement will also secure the management and maintenance of the public realm.
- Carbon offsetting: A carbon offset contribution of £423,000 would be secured and provided prior to commencement to meet London Plan's requirements for major development to achieve zero carbon emissions. Should the Intend to Publish London Plan be adopted prior to a decision on this application, the applicant would be required to pay a further £17,000 in order to meet the zero-carbon target for the commercial element of the scheme. In addition, there would be an increase in the residential element from circa £423k to £670k. As such, should the Intend to Publish London Plan be adopted prior to a decision into this application the total carbon offset payment to be secured would rise to £687,000.
- Healthcare: A healthcare contribution would be provided of £193,500 for improvements to primary healthcare facilities in the vicinity.
- Monitoring contribution: A sum of £17,384 to be paid to the Council for monitoring planning obligations.

## Planning conditions<sup>1</sup>

3 The conditions considered relevant and necessary to this application proposal are listed below:

- 1. Time limit
- 2. In accordance with approved reports, specifications and drawings
- 3. Details of site levels
- 4. Construction, Environmental Management and Logistics Plan
- 5. Demolition and Construction Waste Management Plan
- 6. Piling Method Statement
- 7. Restriction on the use of the commercial floorspace to ensure that retail uses are provided.
- 8. Restriction on primary cooking unless otherwise agreed by the Local Planning Authority.
- 9. Detailed drawings, external materials and balcony screens
- 10. Detailed drawings and external materials for the proposed commercial uses
- 11. Details of landscaping scheme, including children's play space and bollards to the front of the site and elsewhere to prevent vehicles accessing certain areas of the public realm.
- 12. Communal roof top gardens and green/brown roofs
- 13. Unless identified on the approved documents, no use of roof area as a balcony, roof terrace or similar amenity area
- 14. Biodiversity enhancements
- 15. Non-native invasive species
- 16. Restriction on telecommunications equipment
- 17. Details of external lighting within the public realm and on the external facade of the building
- 18. Fire safety
- 19. Accessible and adaptable dwellings
- 20. Archaeology
- 21. Details of sound proofing
- 22. Details of ventilation equipment and external plant
- 23. Limited hours of outside seating
- 24. In accordance with Energy Strategy
- 25. Minimising overheating risk
- 26. BREEAM
- 27. Sustainable Urban Drainage Systems
- 28. In accordance with flood risk assessment
- 29. Water use
- 30. Ground investigation
- 31. Unexpected contamination
- 32. Details of refuse
- 33. In accordance with Air Quality Assessment
- 34. Managing emissions from Combined Heat and Power plant
- 35. Non-road mobile machinery air quality
- 36. Cycle parking details

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<sup>1</sup> Draft conditions have been prepared and will be published as an appendix to this report; this list provides a summary of the draft notice condition headings and maybe subject to amendment in the final version.



- 37. Disabled parking to be provided and retained
- 38. Delivery and servicing plan

## Publication protocol

4 This report has been published seven days prior to the Representation Hearing, in accordance with the Interim Procedure for Representation Hearings at the Greater London Authority during the Covid 19 Pandemic. Where necessary, an addendum to this report will be published on the day of the Representation Hearing. This report, any addendum, draft decision notices and the Mayor of London's decision on this case will be made available on the GLA website:

<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/public-hearings/homebase-manor-road-public-hearing>

## Site description

5 The 1.8 ha application site is triangular in shape and located within the Old Gas Works character area of the London Borough of Richmond. It is bounded by Manor Road Circus to the north, Manor Road to the east, and railway lines to the south (South Western Rail) and west (London Overground). Both these sections of railway line, adjacent to the site, are above ground. While the site itself is not within a designated town centre, it is less than 1 mile from Richmond Town Centre.

6 The site comprises a single storey retail building (use class A1) with a large hipped roof which results in a double height internal space in part. The existing building comprises approximately 5,000 sq.m. of floorspace (GIA) and is currently occupied by Homebase and Pets at Home. There is a large surface level car park to the front of the store providing parking for 174 cars and a small part of the car park is currently used by autoglass and a car washing business. The northern part of the site is an open surface level bus terminus currently used by TfL, with a capacity for five buses. The bus terminus or layover is an area where busses can stop with facilities for drivers and change of drivers can take place if need be.



Figure 1 - Site location plan

7 The surrounding area predominantly comprises mixed-use residential and commercial development. To the east of Manor Road, the area is characterised by two-storey terraced housing, a Sainsbury superstore, and a gas works to the north west tip of the site. To the south of the site beyond the railway line is a residential area of varied character with generally two to three storeys homes and blocks of flats. To the west of the site, beyond the railway line, are residential and commercial buildings up to six storeys in height, with an eleven storey residential building 'The Towers' to the west adjacent to the Sheendale Road Conservation Area. At the south west tip of the site there is a pedestrian footbridge over the railway line connecting Sheendale Road and St Mary's Grove. The heights of the existing properties in the vicinity are indicated below in Figure 2.



Figure 2 - Site plan showing surrounding building heights

8 The site is located approximately 1.1km south of Kew Gardens, a World Heritage Site, and approximately 1.6km north of Richmond Park. The Thames is approximately 1.5km to the west. The site is within Flood Zone 1.

9 The Sheendale Road Conservation Area is 150 metres to the west and the Sheen Road Richmond Conservation Area, which includes the Grade II\* Listed Hickey Almshouses, is 200 metres to the south west. There are a number of Buildings of Townscape Merit in the vicinity of the site (for example 1-11 Manor Road and along Manor Grove to the east).

10 The site is located immediately south of the A316 Manor Circus which forms part of the Transport for London Road Network (TLRN). A level crossing is located on Manor Road adjacent to the south eastern corner of the site.

11 The entrance to North Sheen rail station is located on the opposite side of Manor Road adjacent to the sites south eastern corner; there are also 10 bus routes within an

acceptable walking distance. The application site has a public transport accessibility level (PTAL) of 5, on a scale of 0 to 6b where 6b is the most accessible.

### **Site specific designations**

12 The site sits within Richmond's character area 6 'Old Gas Works', as defined in the Richmond and Richmond Hill Village Planning Guidance SPD (June 2016). The site contains 64 trees which are covered by Area Tree Preservation Orders, is within a London Underground Safeguarding Zone and is known to have had a previous industrial land use. The site is in an Article 4 area (removing permitted development rights for basements), Richmond's higher CIL band, a takeaway restriction zone and National Grid gas safeguard zone.

13 The site does not lie within any strategic views as identified within the Mayor's London View Management Framework SPG. The site is not located within an archaeological priority area.

### **Details of the proposal**

14 The application as originally submitted to the Council in February 2019 sought full planning permission for the demolition of the buildings on the application site and the construction of four buildings of between four and nine storeys comprising 385 residential units, 35% affordable by habitable room, and 480 sq.m. of flexible commercial floorspace (Class A1, A2, A3, D2, B1), with associated works.

15 New information and updated plans were received by Richmond Council on 28 May 2019, including amendments in response to transport comments (for example, provision of showers and lockers associated with the proposed cycle parking); Minor amendments to Block A elevations; Minor amendments to general arrangement and floor plans to align with Fire Safety Strategy; Updates to landscape plans; New information submitted in relation to energy, sustainability, transport, design, landscape proposals, flood risk, drainage, fire safety, trees and wind & microclimate; and an updated Health Impact Assessment and Townscape View Assessment. Given the modest nature of the changes, which were not considered by Richmond Council to prejudice neighbours, a formal re-consultation was not deemed necessary.

16 Two rounds of amendments were made to the scheme following the Mayor's decision to take-over and act as local planning authority for the determination of this application. The first round of amendments was made in November 2019 and consulted upon in December 2019 and January 2020. The second amendments were received in July 2020 and consulted upon in August through to the beginning of September 2020. The July 2020 amendments include the following:

- Increase of 68 residential units from 385 to 453 through optimisation of layouts and massing amendments for Blocks A, B, C & D.
- An amendment to the affordable housing tenure split from 30:70 to 52:48 of affordable rent to intermediate tenures, resulting in a 40% affordable housing offer by habitable room (with grant funding), comprising 84 London Affordable Rent units (52% by habitable room), 34 intermediate Shared Ownership units (21% by habitable room) and 55 intermediate London Living Rent units (27% by habitable room). The table below demonstrates the changes to tenure mix:



Table 1 - Affordable housing tenure within original and amended proposed development.

Tenure	Original Proposal	Amended Proposal	Difference
Affordable London Affordable Rent	40 units (30% by habitable room)	84 units (52% by habitable room)	+44 units (+22% by habitable room)
Intermediate Shared Ownership	94 units (70% by habitable room)	34 units (21% by habitable room)	-60 units (-49% by habitable room)
Intermediate London Living Rent	--	55 units (27% by habitable room)	+55 units (+27% by habitable room)
<b>Total</b>	<b>134 units</b> (35% by habitable room)	<b>171 units</b> (40% by habitable room)	<b>+37 units</b> (+15% by habitable room)

- A reduction of the basement and relocation of the cycle parking and bin storage to the ground floor of each Block.
- An increase in cycle parking and accessible car parking spaces to meet the Intend to Publish London Plan standards.
- Design amendments to each of the Blocks to maximise residential quality, including introducing additional cores, increasing provision of dual aspect units along Manor Road, elimination of all single aspect north facing units, increased separation distances and improvements to residential amenity space quality.
- Rearrangement of the proposed commercial floorspace including extending the commercial frontage within Block D towards North Sheen Station and removal of the retail pavilion in central courtyard.
- Rationalisation of building elevations to improve architectural consistency.
- Amendments to the public realm including redesign of the central courtyard following removal of pavilion; revisions to the play space strategy in line with most up to date GLA requirements; introduction of a half ball-court in south west corner of the site; and reconfiguration of car parking.
- Amendments to the site-wide Energy Strategy to comply with the London Plan Energy Hierarchy.
- Height increases for Blocks A (core A), B, and C; height decreases for Blocks A (core D) and D (core B).

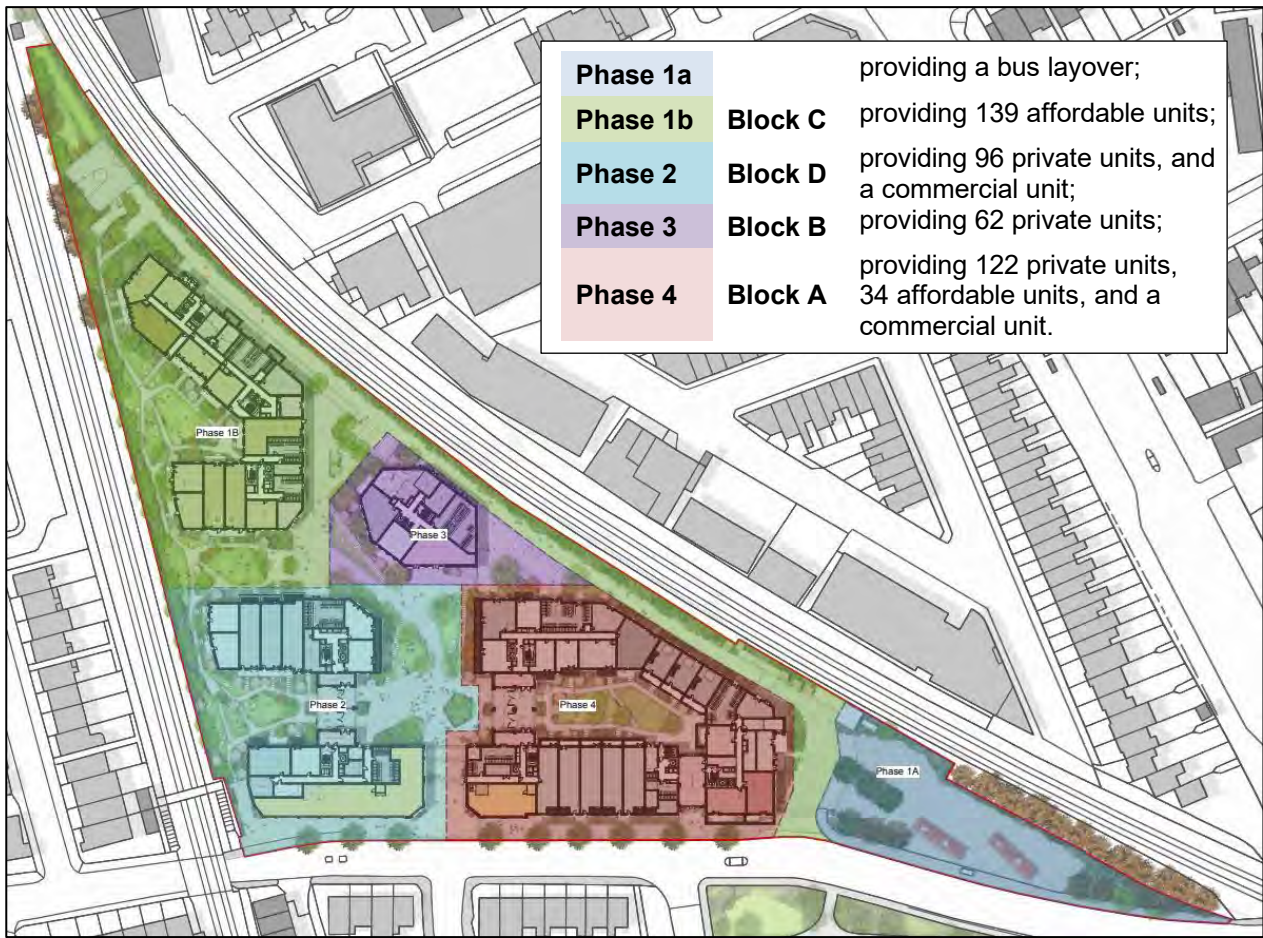


Figure 3 - proposed phasing plan / layout with annotations and use of each building

17 As shown in Figure 4, above, the development would comprise four blocks. The layout has been designed to address existing development along Manor Road to the east, whilst responding to the constraints of the railways along the western and southern boundaries. For this reason, the tallest elements of the development are clustered in the centre of the site and approaching the western boundary, stepping down towards the edges along Manor Road and towards the southern boundary. The elevations fronting onto Manor Road are limited to four storeys to maintain reasonable proportions with the existing residential across the street. The site's main pedestrian and cyclist entrance is from the east of the site from Manor Road close to the North Sheen Station entrance and opposite Manor Grove. The main vehicular entrance is located towards the north of the site (south of the existing bus depot). This entrance retains the existing vehicular access onto Manor Road.

18 The proposed development is split into four separate blocks, known as Blocks A, B, C, and D. The blocks have been subject to amendments in terms of heights, massing and layout to improve the design and residential quality of the proposals.

19 Block A (Phase 4) sits towards the north of the site adjacent the primary vehicular access route. This perimeter block is split into four cores with a central courtyard. The northernmost core is eight-storeys stepping down to four-storeys along Manor Road and the main pedestrian entrance to the site. The block then steps up towards the centre of the site to eight-storeys. The block is predominantly residential with units on all floors, including the ground level, and a ground level commercial unit wrapping around the

southeast corner marking the pedestrian entrance from Manor Road to the heart of the site. The cycle and waste storage are also at ground level in each core. A small basement is located at the south of the building to accommodate cold water tank and pumps, accessed via a hatch.

20 Southwest of Block A is Block B (Phase 3), an octagonal-shaped building, and at eleven-stories, the tallest within the site. It is situated at the western edge across the site from the public entrance creating a visual and physical terminus to the route from Manor Road. There are residential units on each floor with the ground floor also accommodating cycle and waste storage.

21 Block C (Phase 1b) is located at the southwest corner of the site, south of Block B. It is comprised of three cores arranged over two distinct elements. Core A is housed within a ten-storey element that is situated towards the centre of the site and is oriented north-south. Cores B and C are housed within an eight-storey element, which is oriented diagonally paralleling the railway line.

22 Block D (Phase 2) comprises two distinct elements joined by an interconnecting link. The block steps up from a four-storey element fronting onto Manor Road to an eight-storey element towards the centre of the site, with ground floor commercial space along Manor Road and wrapping around the northeast corner marking the pedestrian entrance. The massing and arrangement of this block largely mirrors that of Block A providing visual symmetry which frames the primary pedestrian entrance to the site.

23 The elevations of the proposed buildings from Manor Road looking west are shown in Figure 4 below.



Figure 4 - Manor Road elevation as proposed

24 The proposal includes a new public space in the centre of the site, accessed from Manor Road to the east. The proposed public space includes new tree planting, plant boxes, seating and formal and incidental play space.

25 Vehicular access runs from the main access point, to the north, along the western site boundary to the south western corner of the site. This access is also required by Network Rail to service the neighbouring railway lines. A ball court has been introduced to the far south west of the site, and residents can cross the site from east to west through the landscaped areas to the south of the site between the buildings and the railway line, marking the boundary.

26 The scheme proposes 14 car parking spaces for Blue Badge users with the capability to increase this to 10% if required. 20% of these spaces will be provided with electric vehicle charging facilities. Vehicle access to the car parking and servicing area is



proposed from Manor Road to the east via the existing vehicular entrance currently serving the bus terminus and car park on site. A total of 849 cycle spaces are proposed: 817 to serve the residential component (805 long stay and 12 short stay) and 32 for the commercial (7 long stay and 25 short stay). The residential long stay cycle parking is spread across the development at each core located at ground level.

## Relevant planning history

27 The site's planning history dates back to 1990, for the erection of the non-food retail warehouse that stands on the site (1990 & 1991), change of use of a car sales area to car parking and the bus terminus that stands on the site today (1991), extension to the garden centre (1994), improvements to the bus terminus (2000), and variation of a condition to enable sub-division of the store (the site is currently occupied by Homebase and Pets at Home stores).

28 With reference to the current application, an Environmental Impact Assessment (EIA) Screening Opinion request was considered by Richmond Council, where an EIA was determined not to be required on 14 December 2018. In addition, the GLA considered an EIA Screening Opinion Request for the revised scheme and a negative screening opinion was also given on 24 August 2020. There is no other relevant planning history associated with this site.

29 In addition, it is relevant to note that the adjacent Sainsbury's site to the east is allocated within the LB Richmond Local Plan (SA.21) for a comprehensive redevelopment including retail and residential uses. The continued use of the site as a food store and the re-provision of the existing retail floorspace would also be required.

## Current Application Background

30 Stage 1: On 4 March 2019, Richmond Council notified the Mayor of London that a planning application of potential strategic importance had been submitted, referring it under Categories 1A, 1B and 1C of the Schedule to the Order:

- 1A *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”*
- 1B – *“Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a floorspace of more than 15,000 square metres.”*
- 1C(a) *“Development which comprises or includes the erection of a building that is more than 25 metres high and is adjacent to the River Thames.”*

31 On 15 April 2019 the Mayor considered a GLA planning Stage 1 report with reference GLA/4795/01. This report advised Richmond Council that the principle of a redevelopment of the site for residential and commercial accommodation was supported. The quantum of affordable housing (which was then proposed to be 35% of the scheme), split 36% affordable rent to 64% shared ownership was supported and confirmed as capable of being considered under the Fast Track route, subject to the tenure split being agreed with the Council, affordability being confirmed and the use of grant funding being explored. The high-quality design was supported in line with

strategic policy. Although an increase in cycle parking and amendments to the energy strategy was required, along with some additional information and mitigation, the development was largely in accordance with London Plan and draft London Plan policies, subject to conditions and Section 106 obligations.

32 On 3 July 2019, Richmond Council's Planning Applications Committee resolved to refuse planning permission for the application, in line with officers' recommendation, and on 16 July 2019 the Council advised the Mayor of its decision. The Council's draft decision notice proposed the following reasons for refusal:

1. **Affordable Housing:** The development, by reason of its failure to deliver the maximum reasonable amount of affordable housing, would represent an unacceptable form of development, contrary to the aims of the NPPF, the London Plan (adopted and emerging), Local Plan (policy LP36), Affordable Housing and Planning Obligations Supplementary Planning Document and the Mayor's Affordable Housing SPG.
2. **Design:** The proposal development, by reason of its siting, layout, height, scale, bulk, design and materials is considered to represent a visually intrusive, dominant and overwhelming form of overdevelopment to the detriment of the character of the site and surrounding area; the setting of the Sheendale Road Conservation Area and nearby Buildings of Townscape Merit, and the visual amenities of nearby occupants. The proposal is therefore in conflict with the NPPF, The Adopted and Emerging London Plan, the Local Plan (in particular policies LP1, LP2, LP3, LP4 LP5 and LP8) and Supplementary Planning Documents and Guidance, in particular, Design Quality, Village Plan, Small and Medium Housing Sites.
3. **Residential Amenity:** a. The proposed development, by reason of its siting, layout, height, scale, bulk, and uniform, would represent a visually intrusive and overbearing form of overdevelopment; to the detriment of the surrounding occupant's current level of amenities, in particular those residing at Manor Park; Bardolph Road and Cliveden House; and  
b. The development, by reason of the reductions in daylight to properties immediately adjacent to the site, and the absence of information to demonstrate such resultant levels are akin to existing levels in the immediate and wider local context, the scheme is deemed to result in unacceptable levels of daylight to existing properties.  
For these reasons, the proposed development is contrary to policies LP1 and LP8 of the Local Plan and Supplementary Planning Document 'Residential Development Standards'.
4. **Living Standards:** The proposed development, by reason of its siting, height and design of the proposed buildings, and internal layout and arrangement of the flats; would result in a poor standard of accommodation, causing unacceptable levels of outlook and privacy for future occupiers; and insufficient information has been provided to demonstrate that the scheme provides acceptable levels of daylight to all the proposed residential units. The scheme is thereby contrary to the NPPF, London Plan (Adopted and Emerging), Supplementary Planning Documents and Guidance (in particular Residential Development Standards); and Local Plan (in particular policies LP1, LP8 and LP35).

5. **Energy:** The development, by reason of the insufficient information to demonstrate the scheme:
- a. would comply with the London Plan Energy Hierarchy;
  - b. achieves the highest standard of sustainable design and construction to mitigate the likely effects of climate change and exhausted all opportunities to improve energy conservation and efficiency measures, including an on-site energy network.

The scheme would represent an unacceptable form of development, contrary to the NPPF, London Plan (policy 5.2); Draft London Plan (policy SI2) and the Local plan (LP22).

6. **Absence of a legal agreements**

In the absence of a legal agreement securing the following Heads of Terms, the scheme would represent an unacceptable form of development on grounds of affordable housing; transport; playspace; and sustainability, contrary to the NPPF, the Adopted and Emerging London Plan, the Local Plan (in particular policies LP22; LP31; LP36; LP44; LP45); and Supplementary Planning Documents and Guidance (in particular, Planning Obligations; Car Club Strategy; Affordable Housing):

- Affordable housing -quantum, tenure, affordability, nominations
- Viability Reviews – pre-commencement; early stage and late stage
- Playspace provision and maintenance contribution
- Carbon off-set fund
- Local Employment Scheme – construction and operation
- Controlled parking zone – contribution, consultation, review and implementation
- Removal of car parking permits for controlled parking zone
- Contribution towards railway safety; level crossing improvements, station access feasibility.
- Contribution towards road safety at Manor Circus
- Manor Road improvements
- Car Club provision on site for 2 vehicles and membership for 3 year residential membership;
- Travel Plans – review and bonds

33 Stage 2: On 29 July 2019, The Mayor considered a GLA planning Stage 2 report reference GLA/4795/02. The report concluded that having regard to the details of the application, the development was of such a nature that it would have a significant impact on the implementation of the London Plan, and there were sound planning reasons for the Mayor to intervene in this case and issue a direction under Article 7 of the Order that he would act as the Local Planning Authority for the purpose of determining the application. The report identified that there were outstanding matters that needed to be resolved, including housing and affordable housing matters, the energy strategy, sustainable drainage and transport matters. The Mayor agreed with this recommendation and on 29 July 2019 issued a direction that the Mayor would act as local planning authority for the purpose of determining this application.

34 Since the Mayor issued this direction, GLA officers have worked with the applicant to resolve the outstanding issues on this case and improve the affordable housing offer. An increase in affordable housing to 40% by habitable room with the inclusion of grant



funding has now been secured. Other changes to the scheme since the Mayoral call in are stated above within paragraph 16.

35 Public consultation: has been undertaken on the proposals outlined above, in line with statutory requirements and is summarised in more detail below.

36 Site visit: Prior to the Representation Hearing the Mayor will undertake a site visit in accordance with the Interim Procedure for Representation Hearings at the Greater London Authority during the Covid 19 Pandemic.

37 On 15 September 2020, the Secretary of State issued a Holding Direction preventing the Mayor from granting planning permission.

## **Relevant legislation, policies and guidance**

38 This application for planning permission must be determined by the Mayor in accordance with the requirement of Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 which confirms that applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan for the area comprises the 2016 London Plan (consolidated with alterations since 2011) and the Richmond Local Plan 2018. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should: *“have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

39 The Mayor is also required to have regard to supplementary planning documents and emerging policy (taking into account of the state of the process which it has reached). These are not part of the development plan for the purpose of s. 38(6) of the Planning and Compulsory Purchase Act 2004. National planning policy and guidance is also a material consideration as discussed below.

40 The relevant planning policies and guidance at the national, regional and local levels are noted in the following paragraphs.

### **National planning policy and guidance**

41 The National Planning Policy Framework (NPPF) provides the Government’s overarching planning policy framework. First published in 2012, the Government published a revised NPPF in July 2018 and further revised in February 2019 and June 2019. The NPPF defines three dimensions to sustainable development: an economic role – contributing to building a strong, responsive and competitive economy; a social role - supporting strong, vibrant and healthy communities; and, an environmental role - contributing to protecting and enhancing the natural, built and historic environment. The sections of the NPPF which are relevant to this Application are:

- 2. Achieving sustainable development
- 4. Decision-making
- 5. Delivering a sufficient supply of homes
- 6. Building a strong, competitive economy
- 8. Promoting healthy and safe communities

- 9. Promoting sustainable transport
- 11. Making effective use of land
- 12. Achieving well-designed places
- 14. Meeting the challenge of climate change, flooding and coastal change
- 15. Conserving and enhancing the natural environment
- 16. Conserving and enhancing the historic environment

42 A key component of the NPPF is the presumption in favour of sustainable development. In terms of decision making, this means approving applications that accord with the development plan without delay; or, where there are no relevant development plan policies, or where such policies are out-of-date, granting permission unless either: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole; or where NPPF policies that protect areas or assets of particular importance provide a clear reason for refusing a proposed development.

43 The National Planning Practice Guidance (NPPG) is also a material consideration.

### **Strategic planning policy and guidance**

44 The London Plan 2016 is the Spatial Development Strategy for Greater London. The relevant policies within the London Plan are:

- Policy 1.1 Delivering the strategic vision and objectives for London;
- Policy 2.9 Inner London;
- Policy 2.18 Green infrastructure;
- Policy 3.3 Increasing housing supply;
- Policy 3.4 Optimising housing potential;
- Policy 3.5 Quality and design of housing developments;
- Policy 3.6 Children and young people's play and informal recreation facilities;
- Policy 3.8 Housing choice;
- Policy 3.9 Mixed and balanced communities;
- Policy 3.10 Definition of affordable housing;
- Policy 3.11 Affordable housing targets;
- Policy 3.12 Negotiating affordable housing;
- Policy 3.13 Affordable housing thresholds;
- Policy 3.16 Protection and enhancement of social infrastructure;
- Policy 4.1 Developing London's economy;
- Policy 4.3 Mixed use development and offices;
- Policy 4.6 Support for and enhancement of arts, culture, sport and entertainment;
- Policy 4.7 Retail and town centre development;
- Policy 4.8 Supporting a successful and diverse retail sector;
- Policy 4.10 New and emerging economic sectors;
- Policy 4.12 Improving opportunities for all;
- Policy 5.1 Climate change mitigation;
- Policy 5.2 Minimising carbon dioxide emissions;
- Policy 5.3 Sustainable design and construction;
- Policy 5.4A Electricity and gas supply;
- Policy 5.5 Decentralised energy networks;

- Policy 5.6 Decentralised energy in development proposals;
- Policy 5.7 Renewable energy;
- Policy 5.9 Overheating and cooling;
- Policy 5.10 Urban greening;
- Policy 5.11 Green roofs and development site environs;
- Policy 5.12 Flood risk management;
- Policy 5.13 Sustainable drainage;
- Policy 5.14 Water quality and wastewater infrastructure;
- Policy 5.15 Water use and supplies;
- Policy 5.17 Waste capacity;
- Policy 5.18 Construction, excavation and demolition waste;
- Policy 5.21 Contaminated land;
- Policy 5.22 Hazardous substances and installations;
- Policy 6.1 Strategic approach;
- Policy 6.2 Providing public transport capacity and safeguarding land for transport;
- Policy 6.3 Assessing the effects of development on transport capacity;
- Policy 6.5 Funding Crossrail and other strategically important transport infrastructure;
- Policy 6.7 Better streets and surface transport;
- Policy 6.9 Cycling;
- Policy 6.10 Walking;
- Policy 6.12 Road network capacity;
- Policy 6.13 Parking;
- Policy 6.14 Freight;
- Policy 7.1 Lifetime neighbourhoods;
- Policy 7.2 An inclusive environment;
- Policy 7.3 Designing out crime;
- Policy 7.4 Local character;
- Policy 7.5 Public realm;
- Policy 7.6 Architecture;
- Policy 7.7 Location and design of tall and large buildings;
- Policy 7.8 Heritage assets and archaeology;
- Policy 7.13 Safety, security and resilience to emergency;
- Policy 7.14 Improving air quality;
- Policy 7.15 Reducing noise and enhancing soundscapes;
- Policy 7.19 Biodiversity and access to nature;
- Policy 7.21 Trees and woodlands;
- Policy 7.29 The River Thames;
- Policy 8.2 Planning obligations; and
- Policy 8.3 Community Infrastructure Levy.

45 On 1 December 2017, the Mayor published his draft London Plan for public consultation. Consultation on the Plan closed on 2 March 2018. On 13 August 2018, the Mayor published a version of the draft Plan that includes his minor suggested changes. The draft London Plan was subject to an Examination in Public (EiP), which was undertaken between 15 January and 22 May 2019. On 16 July 2019, the Mayor published the draft London Plan – Consolidated Suggested Changes Version (July 2019), which incorporates the suggested changes put forward by the Mayor before,



during, and after the EiP sessions. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor and this was published on the GLA website on 21 October 2019. On 9 December 2019, the Mayor issued to the Secretary of State his Intend to Publish London Plan, together with a statement of reasons for any of the Inspectors' recommendations that the Mayor did not wish to accept. On 13 March 2020, the Secretary of State wrote to the Mayor setting out his consideration of the Mayor's Intend to Publish London Plan, and issued Directions under Section 337 of the Greater London Authority Act 1999 (as amended). The Mayor has suggested some minor amendments to the Secretary of State's Directions in order to remove policy ambiguities and achieve the necessary outcomes. Discussions are underway to resolve these matters in order to publish the London Plan as soon as possible.

46 The Secretary of State's Directions are reflected in the relevant sections below, and to the extent that they are relevant to this particular application, have been taken into account as a material consideration. The emerging policies of the Intend to Publish London Plan are considered to be consistent with the NPPF and can be given significant weight, other than those subject to Directions from the Secretary of State. Where a material policy is covered by the Secretary of State's Direction this is highlighted in the analysis below (in respect of Policies D3 and H10).

47 The following policies in the Intend to Publish London Plan are considered relevant:

- Objective GG1 Building strong and inclusive communities;
- Objective GG2 Making best use of land;
- Objective GG3 Creating a healthy city;
- Objective GG4 Delivering the homes Londoners need;
- Objective GG5 Growing a good economy;
- Objective GG6 Increasing efficiency and resilience;
- Policy SD10 Strategic and local regeneration;
- Policy D1 London's form, characteristic and capacity for growth;
- Policy D2 Infrastructure requirements for sustainable densities;
- Policy D3\* Optimising site capacity through the design-led approach;
- Policy D4 Delivering good design;
- Policy D5 Inclusive design;
- Policy D6 Housing quality and standards;
- Policy D7 Accessible housing;
- Policy D8 Public realm;
- Policy D9 Tall buildings;
- Policy D11 Safety, security and resilience to emergency;
- Policy D12 Fire safety;
- Policy D13 Agent of Change;
- Policy D14 Noise;
- Policy H1 Increasing housing supply;
- Policy H4 Delivering affordable housing;
- Policy H5 Threshold approach to applications;
- Policy H6 Affordable housing tenure;
- Policy H10\* Housing size mix;
- Policy S4 Play and informal recreation;
- Policy E8 Sector growth opportunities and clusters;

- Policy E9 Retail, markets and hot food takeaways;
- Policy E11 Skills and opportunities for all;
- Policy HC1 Heritage conservation and growth;
- Policy HC3 Strategic and local views;
- Policy G1 Green infrastructure;
- Policy G5 Urban greening;
- Policy G6 Biodiversity and access to nature;
- Policy G7 Trees and woodland;
- Policy SI1 Improving air quality;
- Policy SI2 Minimising greenhouse gas emissions;
- Policy SI3 Energy infrastructure;
- Policy SI4 Managing heat risk;
- Policy SI5 Water infrastructure;
- Policy SI7 Reducing waste and supporting the circular economy;
- Policy SI12 Flood Risk Management;
- Policy SI13 Sustainable drainage;
- Policy SI14 Waterways – strategic role;
- Policy T1 Strategic approach to transport;
- Policy T2 Healthy Streets;
- Policy T3 Transport capacity, connectivity and safeguarding;
- Policy T4 Assessing and mitigating transport impacts;
- Policy T5 Cycling;
- Policy T6 Car parking;
- Policy T6.1 Residential parking;
- Policy T6.3 Retail parking;
- Policy T6.5 Non-residential disabled persons parking;
- Policy T7 Deliveries, servicing and construction;
- Policy T9 Funding transport through planning; and
- Policy DF1 Delivery of the plan and planning obligations.

48 The following published supplementary planning guidance (SPG), strategies and other documents are also relevant:

- Affordable Housing and Viability SPG (August 2017).
- Housing SPG (March 2016);
- Social Infrastructure SPG (May 2015);
- Accessible London: achieving an inclusive environment SPG (October 2014);
- The control of dust and emissions during construction and demolition SPG (July 2014);
- Shaping Neighbourhoods: character and context SPG (June 2014);
- Sustainable Design and Construction SPG (April 2014);
- Shaping Neighbourhoods: play and informal recreation SPG (September 2012);
- Sustainable Design and Construction SPG (April 2014);
- All London Green Grid SPG (March 2012);
- Planning for Equality and Diversity in London (October 2007);
- Use of planning obligations in the funding of Crossrail and the Mayoral Community Infrastructure Levy (April 2013);
- Crossrail Funding (March 2016);

- Mayor’s Transport Strategy (March 2018);
- Mayor’s Environment Strategy (May 2018);
- Mayor’s Housing Strategy (May 2018);

49 The following pre-consultation draft strategic supplementary planning guidance (SPG), strategies and other documents are also relevant but have no material weight due to their early stage of adoption:

- London Cycle Design Standards (October 2016);
- Energy Planning Guidance (April 2020);
- Good Quality Homes for all Londoners - pre-consultation draft (March 2020);
- Public London Charter - pre-consultation draft (March 2020);
- Circular Economy Statement Guidance - pre-consultation draft (April 2020);
- Whole Life-Cycle Carbon Assessments - pre-consultation draft (April 2020);
- ‘Be Seen’ Energy Monitoring Guidance - pre-consultation draft (April 2020);
- Fire Statements Guidance – pre-consultation draft (July 2020); and
- Evacuation Lifts Guidance – pre-consultation draft (July 2020).

### **Local planning policy and guidance**

50 Richmond Council’s Local Plan (2018) provides the local policy approach for the Borough. There have been two applications to the High Court for a statutory review (under s.113 of the Planning and Compulsory Purchase Act 2004) in respect of the adoption of the Local Plan and on 3 March 2020 the Council adopted the two matters that were subject to legal challenges within the Local Plan. Those two matters are not relevant to the issues in this present case. The relevant policies in Richmond Council’s Local Plan are:

#### Richmond Local Plan

- LP 1 Local Character and Design Quality
- LP 2 Building Heights
- LP 3 Designated Heritage Assets
- LP 4 Non-designated Heritage Assets
- LP 5 Views and Vistas
- LP 6 Royal Botanic Gardens, Kew World Heritage Site
- LP 8 Amenity and Living Conditions
- LP 10 Local Environmental Impacts, Pollution and Land Contamination
- LP 11 Subterranean Development and Basements
- LP 15 Biodiversity
- LP 16 Trees, Woodland and Landscape
- LP 17 Green Roofs and Walls
- LP 20 Climate Change Adaptation
- LP 21 Flood Risk and Sustainable Drainage
- LP 22 Sustainable Design and Construction
- LP 23 Water Resources and Infrastructure
- LP 24 Waste Management
- LP 27 Local Shops, Services and Public Houses
- LP 30 Health and Wellbeing



- LP 31 Public Open Space, Play Space, Sport and Recreation
- LP 34 New Housing
- LP 35 Housing Mix and Standards
- LP 36 Affordable Housing
- LP 37 Housing Needs of Different Groups
- LP 39 Infill, Backland and Backgarden Development
- LP 40 Employment and Local Economy
- LP 44 Sustainable Travel Choices
- LP 45 Parking Standards and Servicing

Supplementary Planning Documents/Guidance:

- Air Quality
- Affordable Housing
- Buildings of Townscape Merit
- Conservation Areas
- Design for Maximum Access
- Design Quality
- Development Control for Noise Generating and Noise Sensitive Development
- Planning Obligations
- Refuse and Recycling Storage Requirements
- Residential Development Standards
- Richmond and Richmond Hill Village Planning Guidance
- Security By Design
- Sheen Road Conservation Area Statement and Study
- Sheendale Road Conservation Area Statement and Study
- Sustainable Construction Checklist
- Transport
- Trees: Landscape Design, Planting & Care
- Trees: Legislation and Procedure

Richmond Community Infrastructure Levy

51 London borough councils are able to introduce Community Infrastructure Levy (CIL) charges which are payable in addition to the Mayor's CIL (MCIL). Richmond Council's CIL Charging Schedule came into effect from 1 November 2014. The CIL charging schedule for "residential development (higher band)" in the borough (where the application proposal is located) sets a rate of £250 per sq.m. for housing and "Retail (wholly or mainly convenience) (all areas)" sets a rate of £150 charge for the retail element of the development. The remaining uses proposed are nil charge. Following the adoption of a new charging schedule, MCIL 2 rates now apply to planning permissions granted from 1 April 2019. Accordingly, a MCIL rate of £80 per sq.m. would apply to the residential and commercial floorspace proposed. CIL liability would be subject to relief for the affordable housing element of the scheme.

**Response to consultation and notification**

52 As part of the planning process Richmond Council has carried out statutory notification on the application. The application was publicised by sending notifications to

approximately 2,400 addresses in the vicinity of the site, as well as posting site notices close to the site and press notices. Consultations of all relevant bodies also took place.

53 Following the submission of the amended scheme to the GLA on 22 November 2019, the GLA issued notifications on 29 November 2019; however, due to an administrative error several intended recipients were omitted from this distribution. For this reason, a second notification was issued on 10 January 2020. The re-notification included letters to all those originally notified, all respondents to the Councils original notification, a press notice in the Richmond and Twickenham Times and site notices in the vicinity. 21 days were given from the date of the letter to respond to the notification.

54 Following further amendments to the scheme received on 31 July 2020 a third consultation commenced on 6 August 2020. This consultation included site notices, letters to all those originally notified and respondents to previous notifications, letters to statutory consultees, and press notifications. 28 days were given from the date of the letter to respond to the consultation.

55 All responses received in response to Richmond Council's local notification process, and any other representations received by Richmond Council and/or the Mayor of London in respect of this application at the time of writing this report, are summarised below. All comments received have been considered in forming the officers' recommendation set out in this report. The Mayor has been briefed on the amount and content of all consultation and notification responses and has copies of these made available to him in either electronic or hard copy for consideration.

### **Statutory Consultee responses to Richmond Council**

56 Greater London Authority (including Transport for London): The Mayor's consultation stage comments (GLA report ref: GLA/4795/01) and the Mayor's stage 2 decision (GLA report ref: GLA/4795/02) are set out in those reports and summarised in the 'Relevant case history' section above.

57 Historic England: no objection.

58 Greater London Archaeological Advisory Service (GLAAS): no objection.

59 Kew Gardens: no objection.

60 Natural England: no comments.

61 Thames Water: No objection subject to a condition and informatives.

62 Environment Agency: No objection subject to conditions.

63 Metropolitan Police: No objection subject to Secure by Design condition.

64 Network Rail: No objection subject to s106 contributions.

65 Achieving for Children (children's services for Kingston and Richmond): primary level capacity; secondary level capacity subject to new school coming forward being delivered.

66 Kingston and Richmond Clinical Commissioning Groups: no objection subject to a S106 contribution towards primary healthcare in the local area.

67 London Underground Infrastructure Protection: no comments.

68 London Overground Infrastructure Management: no assets nearby.

69 Cadent Gas: no objection and gas pipeline will not be affected.

### **Richmond Council Internal Consultees**

70 LB Richmond Housing: The proposal fails to comply with Mayoral and Richmond targets and requires s106 obligations.

71 LB Richmond Ecology: No objection subject to conditions.

72 LB Richmond Emergency Planning: No comments.

73 LB Richmond Parks and Open Spaces: identify playscape concerns and possible remedies. Additional detail required by planning condition and planning contributions requested.

74 LB Richmond (Environmental Health – Air Quality): No objection subject to conditions.

### **Other responses to the Council, including residents' groups and elected members**

- Richmond and Twickenham Green Party: concerned about scale and density of the proposals, traffic congestion impacts and lack of open space.
- The Kew Society: concerned about height, density, its design and impact, parking provision, air quality and affordable housing.
- Richmond Society: concerned about parking, density, height and mass; suitability of car free development and queried application boundary red line.
- Two joint submissions were received from North Richmond Ward Councillors Baldwin, Pyne and Warren: The first submission objected to the overdevelopment of the site; highlighted the unreasonable impacts this would have on local amenities through parking, congestion, transport issues and height; called for North Sheen Station to be upgraded; and raised a greater proportion of the flats to be available for rent via a housing association; A second response was submitted to Richmond in response to the GLA stage 1 review and its view on housing, transport, height and density, design and community, stating the GLA's analysis of Avanton's proposals is poor and they have paid scant regard to the local area and how the envisaged scheme will affect it. Notably, they agreed that Richmond Affordable Rent affordability is too high.

### **Representations to the Mayor of London**

75 At the time of reporting the application to its planning committee, Richmond Council reported that it had received 724 responses (to the initial, first and second notifications) from local residents, of which 694 were objections, 5 were in support and 25 were general observations. All responses were provided to the GLA subsequent to the



decision to take over the application. Following the Mayor's decision to take over the application, there were two subsequent re-notifications on the amended scheme. In total, an additional 1073 responses in objection and 1 response in support of the development have been received. All representations submitted have been taken into account in the consideration of this application, as set out below, and have been made available to the Mayor in advance of the hearing.

76 The relevant material planning considerations raised in objection to the proposals can be summarised as follows:

- Insufficient affordable housing provision
- Impact of height, scale and mass on heritage assets, neighbourhood and amenity;
- Out of character and materials not in-keeping;
- Poor design quality;
- Disabled access not sufficient;
- Insufficient landscaping and greenspace;
- Loss of trees;
- Lack of playspace;
- Adverse impact on highways, traffic, parking and public transport;
- Lack of parking on site;
- Cycle infrastructure insufficient and needs improving
- North Sheen station cannot cope with additional capacity and needs improving;
- Concerns about effectiveness of proposed Controlled Parking Zone (CPZ)
- Concerns proposals will be a gated community / lack of access to local residents
- Impact on noise, privacy, daylight, sunlight, air pollution and general amenity;
- Social infrastructure insufficient (doctors, schools);
- Drainage and sewerage will not cope;
- Urban heat island effect will be caused;
- Anti-social behaviour will increase;
- Loss of retail on site;
- Loss of employment;
- Approving the proposals would be inconsistent with Richmond's previous decisions and set a planning precedent;
- Cumulative impact of other development coming forward locally; and
- Construction impacts – dust, noise etc.

77 The relevant material planning considerations raised in support of the proposal can be summarised as follows:

- The need for additional housing;
- The need to reduce cars on the roads;
- The activity that the development would bring to the area; and
- Presents an opportunity to modernise the North Sheen Station.

78 The relevant material planning considerations raised in general observation of the proposal can be summarised as follows:

- Concern regarding the parking provided;
- Observation that the nearest primary school is half-empty and would benefit from this proposal;
- Suggested that spaces should be available for car-sharing;
- Suggestion that a clear statement of intent regarding the regulation of resident parking permits be provided;
- Suggestion that the vehicle access point be located as close to Manor Circus as possible to prevent further congestion on Manor Road;
- Suggestion that Council should introduce new signage on Manor Road directing drivers to switch off their engines waiting at the barrier crossing;
- Questions whether there was a covenant on the site; and
- Questions regarding the role and remit of the Design Review Panel.

### **Richmond Council Comments on Revised Scheme**

79 On 3 September 2020 Richmond Council submitted a formal response to the July 2020 amended scheme. In its response the Council reiterated its objection to the proposed scheme, citing the following outstanding concerns:

#### Affordable Housing

80 The response notes that despite the increase in affordable housing from 35% to 40% this provision does not meet the 50% requirement set by Local Plan Policy LP 36 nor does it meet Fast Track tenure split requirements. The Council objects to the lack of viability information demonstrating that the maximum reasonable provision of affordable housing is being delivered and requires further modelling to confirm that the overall number and proposed affordable mix provides the optimum level and tenure mix of affordable homes in line with local need. To this end, the Council states that it would welcome the opportunity to swap intermediate homes and LAR homes in order to improve the number of family-sized rented homes, with support from the Council's Housing Capital Programme, in order to better meet the Mayor and Borough affordable housing requirements set out in the adopted Development Plan.

81 The Council further objects to the distribution of wheelchair accessible units across tenures, the affordability criteria for the Shared Ownership units, and affordability of the proposed London Living Rent units.

82 The Council identified the following matters to be resolved through the s106 negotiations:

- Quantum, tenure and mix, affordability;
- Phasing and delivery;
- Review mechanisms;
- Service charge to be captured within the Borough's affordability threshold;
- Marketing to those living or working in the Borough of Richmond in housing need;
- To consider uplift (or adjustment of tenure mix) through potential of Mayoral grant together with the Council's Housing Capital Programme funding; and
- Wheelchair accessible homes across tenure.

### Design and Landscaping

83 The Council contends that despite some improvements, the reasons for refusal set out in the initial committee report have not been overcome including the proposed heights in relation to the surrounding townscape, and the top floors of Blocks A, C, and D appearing 'heavy' and requiring further refinement in terms of materials choice.

### Residential Amenity

84 The Council reiterated that previous objections and reasons for refusal remain valid, including:

- The increase in height of Blocks C and D exacerbating impact on amenity of neighbours to the south on Manor Par and Calvert Court by way of being overbearing, visually intrusive, and overlooking;
- The increase in height of Block B worsening its impact on residents to the west of the site (in combination with Blocks C and D) to the detriment of their amenity;
- Concerns over the proposal's impact on Cliveden House; and
- Lack of information of light – whether the proposed relationship is reflective of the surrounding context.

### Living Standards

85 The Council recognises that some concerns have been addressed; however, previous and new objections remain including issues of overlook, the separation of units within Block C, single aspect units within Block B facing Block D, and light levels.

### Energy

86 While improvements in carbon dioxide reductions are noted, the Council expects that concerns raised at Stage 1 will have been fully addressed and that the development will comply with the Energy Hierarchy overall. The Council also expects that the required carbon offset contributions be secured within the s106 and that the development achieve the highest standard of construction.

### Legal Agreements and Conditions

87 The Council acknowledges that the heads of terms referred to within the committee report (Appendix 2) is forming the basis of a draft Section 106 Agreement. The Applicant has stated that this will be agreed in advance of the public hearing and LBRuT officers expect to be involved in the process of agreeing the legal agreement. The Council will provide specific comment separately; however, reiterated that all planning obligations outlined in the initial committee report remain valid.

### Land Use

88 The Council raise no objection.



## Playspace

89 The Council require further details on play facilities and justification as to why the play space requirement for under-11s is not being met on site. In addition, the Council require that an operations policy and contribution to offset increased use of local parks be secured by s106 obligation or planning condition, as appropriate.

## Transport

90 The Council require amendments to the following:

- Waste and servicing details;
- Increase in refuse and recycling storage; and
- Clarity on future provision of disabled bays.

91 The Council also require the following Heads of Terms:

- Highway works required to pedestrian refuge;
- CPZ contribution required;
- Removal of car parking permits;
- Various financial contributions;
- S38 and S278 works; and
- Contribution towards uplift in servicing.

## Ecology

92 The Council raises concern over the Urban Greening Factor requirements not being met.

## Trees

93 The Council raises some concern over the suitability of the proposed street planning and requests that further details of planting and landscaping, including a Tree Planting Scheme, be secured by condition.

## Air Quality and Noise

94 The Council insist that the requirements of the recently adopted Air Quality SPD be met.

## Education

95 The Council assert that the increased education need and continued uncertainty over the delivery of a new secondary school are important material considerations.

## Health

96 The Council require a financial contribution of £193,500 towards primary healthcare.

## **Representations summary**

97 All the representations received in respect of this application have been made available to the Mayor; however, in the interests of conciseness, and for ease of reference, the issues raised have been summarised in this report as detailed above.

98 The main issues raised by the notification responses and the various other representations received are addressed under the relevant topic headings within this report and, where appropriate, through the proposed planning conditions, planning obligations outlined in the recommendation section herein.

## **Environmental Impact Assessment**

99 On 19 July 2020, an EIA Screening Opinion was requested by Avison Young on behalf of the Applicant regarding the proposed mixed-use development to provide 453 homes, flexible commercial floorspace, new public realm, associated landscaping and servicing arrangements. On 24 August 2020 the Greater London Authority provided written confirmation that an EIA would not be required.

## **Principal Planning Issues**

100 Having regard to the site and the details of the proposed development, relevant planning policy at the local, regional and national levels; and, the consultation responses and representations received, the principal planning issues raised by the application that the Mayor must consider are:

- Principle of development, including residential-led mixed-use development, housing delivery, and loss of retail;
- Housing, including affordable housing, housing tenure and mix, and playspace;
- Design, including design scrutiny; site layout; height, massing, townscape and views; architecture and materials; heritage; density; residential quality, including impacts on neighbouring properties (aspect; external amenity; privacy, outlook and sense of enclosure; daylight, sunlight, and overshadowing; and air quality); fire safety; designing out crime; and inclusive design;
- Environment, including energy (minimisation of carbon emissions in development and through energy efficient design); flood risk, sustainable drainage, and water efficiency; air quality; noise impact; waste management; and urban greening;
- Transport, including trip generation and modal split; mitigating highway network impact; public transport capacity and mitigation; active transport; Healthy Streets; car and cycle parking; deliveries and servicing; construction logistics; travel planning; and infrastructure and transport operations protection;
- Mitigating the impact of development through planning obligations;
- Legal consideration; and
- Public Sector Equality Duty (PSED) and Human Rights.

101 These issues are considered within the following sections of the report.

## **Land Use Principles**

102 The NPPF identifies a set of core land-use planning principles which should underpin both plan-making and decision-taking when making effective use of land. Of particular relevance to this case are the directions that planning should:

- encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains;

- give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; and
- promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).

103 The Mayor's overarching objective is to meet London's housing and development need by making the best use of land, whilst safeguarding the Green Belt and designated open spaces. This is reflected in London Plan Policy 1.1 and Intend to Publish London Plan objectives on 'Good Growth' GG1, GG2, GG3, GG4, GG5, and GG6, which support intensified, high-density, mixed-use and mixed housing tenure places, particularly on sites well connected by existing or future public transport, walking and cycling connections, and development on brownfield land.

104 London Plan Policy 2.6 states that the Mayor will work to realise the potential of outer London, recognising and building upon its great diversity and varied strengths by providing locally sensitive approaches to enhance and promote its distinct existing and emerging strategic and local economic opportunities, and transport requirements. This policy also states that the Mayor will enhance the quality of life in outer London for present and future residents as one of its key contributions to London as a whole.

105 Intend to Publish London Plan Policies D3 and D4 encourage the masterplanning of large sites in order to optimise site capacity and deliver good design. These policies promote a design-led approach to development which responds to a site's context and optimising its capacity for growth in line with relevant planning policies and objectives. It is noted that Policy D3 is subject to the SoS Direction and the implications of this are discussed in more detail in the design section of this report.

106 Whilst the site is not in an Opportunity Area, it does comprise previously developed land in a highly accessible and sustainable location. Richmond Core Strategy Policy LP1 supports development proposals that are compatible with the local area, make best use of land and are appropriate in terms of suitability and compatibility of uses. The existing buildings are not noted for their historical or architectural merit, so their demolition is acceptable in principle. For these reasons, a residential-led mixed use development on the site is consistent with the aims of strategic and local planning policy. Specific land use considerations are outlined further below.

## **Commercial Uses**

107 London Plan Policy 4.7 and Intend to Publish London Plan Policy E9 prioritise retail development in town centre locations. Richmond's Local Plan does not seek to retain a large quantum of retail in this location nor is the existing retail use protected under LP 25 or LP 26, since it is not within a town centre or defined retail frontage.

108 Richmond's Local Plan Policy LP40 states that the Council will support a diverse and strong local economy, directing major new employment development towards Richmond and Twickenham centres. Other employment floorspace of an appropriate scale may be located elsewhere. The provision of small units, affordable units and



flexible workspace is also encouraged. Richmond Local Plan Policy LP41 support smaller scale office development in suitable locations.

109 The proposals include 495 sq.m. of flexible retail/community/office floorspace.

Table 2 - Existing versus proposed employment floorspace (GIA)

<b>Use Class</b>	<b>Existing sq.m. (GIA)</b>	<b>Proposed sq.m. (GIA)</b>	<b>Net change (sq.m.)</b>
Class A1	5,000	0	<b>-5,000</b>
Flexible retail/community/office	0	495	<b>+495</b>
<b>Total</b>	<b>5,000</b>	<b>495</b>	<b>-4,505</b>

110 To ensure that active frontages are retained to the sites frontage a restriction will be imposed by condition to ensure that at least 50% of the commercial floor area would be used for A1 (retail)/A3 (restaurants) as per the use classes order in August 2020. In addition, the applicant has confirmed that facility will be provided for tenants to install mechanical ventilation systems in these units and the space for a roof extraction system in Core A of Block D to ensure no harm to neighbouring or future residents from fumes / noise should any restaurant uses be implemented at ground floor level.

111 Whilst the proposal would result in the loss of the existing buildings containing approximately 5,000 sq.m. (GIA) of retail floorspace, there is no in principle objections to this loss given the policy position that such uses will only be protected in certain centres. 495 sq.m. of flexible commercial uses would be re-provided within the site close to North Sheen Railway Station. This provision would be a more appropriately scaled for this area whilst at the same time increasing activation along Manor Road. In addition, the proposal would create additional employment through the buildings construction and the applicant has agreed to enter into a local employment scheme with the Council.

## **Residential Use**

112 The NPPF sets out the Government’s priority to deliver a sufficient supply of new homes to meet housing requirements and states that planning policies and decisions should seek to make effective use of land and support the redevelopment of under-utilised land and buildings. In line with paragraph 118 of the NPPF, substantial weight should be given to the value of developing brownfield land in meeting housing need.

113 London Plan Policy 3.3 seeks to increase the supply of housing within London and sets Richmond Council a target to deliver a minimum of 3,150 homes in the Plan period 2015-2025, which equates to an annualised average housing target of 315 homes per year. Policy H1 of the Intend to Publish London Plan updates this target to 4,110 homes to be delivered between 2019/20 and 2028/29, which equates to an annualised average of 411 new homes.

114 To meet housing targets, London Plan Policy 3.3 emphasises the particular importance of mixed-use redevelopment of surplus commercial capacity. Similarly, Policy H1 requires boroughs to optimise housing delivery on all suitable and available

brownfield sites, specifically identifying car parks and low-density retail parks as a source of capacity for housing delivery. These policies carry forward the Mayor's overarching objective to meet London's housing need by making the best use of potential capacity on brownfield land within the capital, whilst safeguarding the Green Belt and other designated open spaces, as set out in London Plan Policy 1.1 and Intend to Publish London Plan objective GG2.

115 Richmond Local Plan Policy LP 34 makes provision for the borough to meet or exceed the housing target set by the London Plan. This policy identifies the area of Richmond, inclusive of the application site, as having some of the highest indicative capacity for new housing units within the borough.

116 Table 3 below sets out the London-wide delivery against current London Plan housing targets for the period of FY2016 to FY2018, the most recent years for which reliable data is available.

Table 3 - Delivery against pan-London housing and affordable housing targets (source: London Development Database).

<i>London</i>	<b>FY2016</b>	<b>FY2017</b>	<b>FY2018</b>	<b>Total</b>	<b>Delivery</b>
Homes target	42,389	42,389	42,389	127,167	<b>85% of target</b>
<b>Homes delivered</b>	<b>40,674</b>	<b>31,543</b>	<b>36,161</b>	<b>108,378</b>	
Affordable homes target	17,000	17,000	17,000	51,000	<b>35% of target</b>
<b>Affordable homes delivered</b>	<b>6,827</b>	<b>4,431</b>	<b>6,648</b>	<b>17,906</b>	

117 Table 4 below sets out the number of homes and affordable homes delivered within LB Richmond upon Thames relative to the London Plan targets.

Table 4 - LBRuT delivery against London Plan housing targets and Local Plan affordable housing targets (source: London Development Database).

<i>LB Richmond upon Thames</i>	<b>FY2016</b>	<b>FY2017</b>	<b>FY2018</b>	<b>Total</b>	<b>Delivery</b>
Homes target	315	315	315	945	<b>134% of target</b>
<b>Homes delivered</b>	<b>469</b>	<b>381</b>	<b>419</b>	<b>1,269</b>	
Affordable homes target	158	158	158	474	<b>37% of target</b>
<b>Affordable homes delivered</b>	<b>62</b>	<b>41</b>	<b>70</b>	<b>173</b>	

118 The above tables demonstrate that while Richmond has exceeded its overall housing delivery target for the past three years, over this same period it has fallen well short of meeting its affordable housing targets. It should also be noted that all targets are expressed as minimums, with a clear expectation in the London Plan that delivery of housing should be maximised.

119 The proposal comprises 173 affordable housing units (40% by habitable room) with a tenure split comprising 52% London Affordable Rent, 27% London Living Rent, and 21% Shared Ownership units. This proposal, which is equal to the Council's total affordable home delivery over the 2016-2018 period, would exceed Richmond's annual affordable housing target by 10%. The proposal would also contribute towards meeting a strategic affordable housing need in London as per Table 3 above.

120 In accordance with the NPPF, significant weight should be given to the value of developing brownfield land in meeting housing need. The proposed scheme would optimise the residential capacity of this well-connected brownfield site and make a significant contribution towards achieving the Council's housing targets and meeting a strategic pan-London need for conventional and affordable housing by providing 453 new homes, including 173 affordable units (40% by habitable room, 38% by unit). The proposal therefore accords with the NPPF; London Plan Policies 2.13 and 3.3; Intend to Publish London Plan Policies H1 and SD1; and Good Growth objectives within the Intend to Publish London Plan.

### **Social Infrastructure**

121 London Plan Policies 3.16, 3.17, and 3.18 and Policies S1, S2, and S3 of the Intend to Publish London Plan support the provision of adequate social infrastructure including health and education facilities as part of new developments and states that facilities should be accessible by walking, cycling and public transport.

122 Richmond Local Plan Policy LP 28 states that development proposals for 10 or more residential units should assess the potential impacts on existing social and community infrastructure in order to demonstrate to the Council that there is sufficient capacity within the existing infrastructure to accommodate the needs arising from the new development. This policy also supports new or extensions to existing social and community infrastructure where it provides for an identified need; is of a high quality and inclusive design providing access for all; and where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access.

123 The applicant's updated Health Impact Assessment (HIA) has modelled the impact of the development on social infrastructure in the area, including primary and secondary schools and healthcare facilities, taking into account the existing and future levels of demand and capacity and cumulative effects associated with other extant planning permissions expected to be brought forwards in the area.

### **Primary and Secondary Schools**

124 According to the GLA's Population Yield calculator, the development is expected to generate approximately 920 residents including 73 children under 5, 51 children between ages 5-11 and 25 children aged 12-17. This would result in the need for 51 primary and 25 secondary school places. The HIA indicates that there is a surplus capacity of 560 primary school places within a 1.6-mile radius and a surplus capacity of 5,671 secondary school places within a 3.4-mile radius of the site.



125 Concerns were expressed in the Committee Report and the Council's formal response to the amended scheme over the secondary school capacity, stating that the secondary school capacity in the eastern part of the borough is dependent on a new school being provided as part of the redevelopment of the Stag Brewery site. The Council resolved to grant permission for the Stag Brewery redevelopment, however this application has been called in by the Mayor with a hearing scheduled for November.

126 The Council decided not to recommend refusal on these grounds, and it is considered that the increased demand for school places can be adequately met through the existing school capacity in the area and the CIL contribution from the development of this site. For these reasons, the impact of the proposed development on the secondary and primary school provision in the local area is considered to be limited and acceptable.

### Healthcare

127 The HIA includes an assessment of the impact on health facilities. This assessment indicates that there are seven GP surgeries within a one-mile radius of the proposed development and that the average number of registered patients per FTE GP within this radius is 1,712 (which is lower than the HUDU<sup>2</sup> guidance of 1,800 patients per GP). A contribution of £193,500 towards the provision of healthcare in the local area will also be secured within the Section 106 Agreement. The impact on local healthcare facilities is therefore considered acceptable, subject to the mitigation measures described herein.

### Impact on Social Infrastructure Conclusion

128 The impact of the proposal on existing and planned social infrastructure within the local area would be mitigated through appropriate CIL and Section 106 contributions and therefore the proposal accords with London Plan Policies 3.16, 3.17, 3.18; Intend to Publish London Plan Policies S1, S2, S3; and Local Plan Policy LP 28.

### **Principle of Development Conclusion**

129 As set out above, the residential-led mixed use redevelopment of this highly accessible edge of town centre brownfield site would contribute significantly towards the housing and affordable housing targets for the borough and wider London area as well as providing complementary commercial floorspace and a new high-quality piece of public realm. Additionally, it is noted that Richmond Council did not resolve to refuse planning permission on land use grounds. For these reasons, the proposal accords with London Plan Policies 1.1, 2.6, 3.3, 3.16, 3.17, 3.18, and 4.7; the Intend to Publish London Plan Good Growth objectives and Policies H1, SD1, E9, S1, S2, and S3, and Richmond Council Local Plan Policies LP 25, LP 26, LP 28, LP 40 and LP 41. The principle of the proposed development is in accordance with the development plan.

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<sup>2</sup> London Healthy Urban Development Unit Planning Contributions Model

## Housing

### Affordable housing

130 The NPPF states that local planning authorities should specify the type of affordable housing required and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified; and the agreed approach contributes to the objective of creating mixed and balanced communities.

131 London Plan Policy 3.11 states that the Mayor will, and boroughs should, seek to maximise affordable housing provision and ensure the provision of an average of at least 17,000 more affordable homes per year in London up to 2031, 60% of which should be social/affordable rent with the remaining 40% comprised of intermediate tenures and products.

132 London Plan Policy 3.12 requires that the maximum reasonable amount of affordable housing should be sought when negotiating on individual schemes, taking into account a range of factors, including the requirement for affordable housing; affordable housing targets; the need to promote mixed and balanced communities; specific site circumstances; development viability; public subsidy and the resources available to fund affordable housing; and the implications of phased development, including provisions for re-appraising the viability of schemes prior to implementation.

133 In August 2017, the Mayor published his Affordable Housing and Viability Supplementary Planning Guidance (SPG) which sets out his preferred approach to maximising the delivery of affordable housing and introduced the 'Fast Track Route' for applications that meet or exceed the Mayor's threshold for affordable housing (by habitable room). In addition, to qualify for the 'Fast Track Route', an applicant must have explored the potential to increase the level of affordable housing using grant funding and an early stage review mechanism must be secured, which seeks to incentivise the early implementation of any planning permission. Applications which are considered eligible for the Fast Track Route are not required to submit a financial viability assessment or be subject to a late stage viability review mechanism (as is required for applications which follow the 'Viability Tested Route').

134 The threshold approach to affordable housing is also set out in Policies H4, H5 and H6 of the Intend to Publish London Plan. Policy H4 sets a strategic target for 50% of all new homes to be affordable. Policy H5 identifies a minimum threshold of 35% affordable housing (by habitable room); or 50% on public sector owned sites and industrial sites. In this case the land is neither publicly owned nor is it an industrial site; therefore, the 35% threshold applies.

135 Policy H6 of the Intend to Publish London Plan confirms the Mayor's priority to deliver genuinely affordable housing and sets out minimum expectations in relation to tenure split. This requires at least 30% of affordable housing to comprise low cost rent units (either social rent or London Affordable Rent); 30% intermediate housing; with the remaining 40% determined by the borough, having regard to identified need.

136 Richmond Local Plan Policy LP36 seeks 50% affordable housing on all sites, 80% of which should be for affordable rent and 20% intermediate tenure. For individual planning applications, a financial viability assessment should be submitted where schemes propose less than 50% affordable housing. A key objective of policy LP 36 is to

secure the maximum reasonable amount of affordable housing taking account of the relevant circumstances.

137 When the Mayor considered this application at Stage 1, the scheme proposed 385 residential units, of which 134 units (35% by habitable room) were affordable, split 36% Richmond Affordable Rent (RAR) and 64% intermediate shared ownership by habitable room. At that time, the tenure mix was considered to comply with the Mayor’s SPG and draft London Plan Policy H6, however, it did not meet the boroughs required 80:20 split. It was noted that the scheme could be eligible for the Fast Track Route if the proposed tenure split was agreed by the Borough. The Mayor also raised concern with the affordability of Richmond Affordable Rent in comparison to London Affordable Rent; which is demonstrated in Table 5 below. As such, the submitted financial viability assessment was to be robustly scrutinised; however, this process was not completed prior to Richmond Council’s refusal of the scheme and Stage 2 referral to the Mayor.

Table 5 - Affordable rent rate comparison as presented at Stage 1 (2019)

<b>Units size</b>	<b>Richmond Affordable Rent</b>	<b>London Affordable Rent</b>
1-bed	£210/week	£144/week
2-bed	£225/week	£153/week
3-bed	£200/week	£161/week

### Tenure

138 At Stage 2, the 35% affordable housing offer comprising 36% RAR and 64% intermediate shared ownership continued to be supported by the GLA and considered eligible for the Fast Track Route. Since the Mayor’s decision to take over the application in July 2019, the affordable housing offer was increased to comprise 40% of the overall scheme (with grant funding), and the tenure split was amended to comprise 52% London Affordable Rent, 21% Shared Ownership and 27% London Living Rent, calculated by habitable room. The evolution of the affordable housing offer from the initial submission to date is summarised in Table 6 below.



Table 6 - Affordable Housing History

	Initial submission considered by Mayor at Stage 1 and 2 (July 2018)		Current proposal (July 2020)	
	Units	Habitable Rooms	Units	Habitable Rooms
<b>London Affordable Rent</b>	0	0	84	247
<b>Richmond Affordable Rent</b>	40	135	0	0
<b>London Shared Ownership</b>	94	236	34	101
<b>London Living Rent</b>	0	0	55	129
<b>Total</b>	<b>134</b>	<b>371</b>	<b>171</b>	<b>477</b>
	<b>35% by habitable room</b>		<b>40% by habitable room</b>	

139 As noted above, the scheme originally comprised a 35% affordable housing offer with a 36:64 tenure split of affordable rent to intermediate and was considered eligible for the Fast Track Route. Subsequent to the Mayor’s takeover of the scheme the affordable housing offer was improved in terms of number of units and affordability of tenures. The tenure split of the first 35% of the affordable offer was improved to comprise 60:40 London Affordable Rent to intermediate products, plus an additional 31 intermediate units to take the overall total up to 40%. This offer continues to be considered Fast Track eligible on the grounds that the homes provided in exceedance of the 35% threshold are genuinely affordable, per Intend to Publish London Plan Policy H6B. The resultant affordable housing offer, which will be secured in the Section 106 Agreement, is expressed below in Table 7.

Table 7 - Detailed affordable housing offer

Tenure	Unit size			Affordable Percentage		Total	
	1-bed	2-bed	3-bed	By unit	By habitable room	Units	Habitable Rooms
<b>London Affordable Rent</b>	20	49	15	49%	52%	84	247
<b>Shared Ownership</b>	1	33	0	20%	21%	34	101
<b>London Living Rent</b>	36	19	0	31%	27%	55	129
<b>Total</b>	<b>57</b>	<b>101</b>	<b>15</b>	<b>100%</b>	<b>100%</b>	<b>173*</b>	<b>477**</b>
* 38% of scheme by unit							
** 40% of scheme by habitable room							

## Affordability

140 Policy H6 of the Intend to Publish London Plan and the Mayor's Affordable Housing and Viability SPG set out the Mayor's priority to deliver genuinely affordable housing. London Affordable Rent constitutes a low-cost rent product for households on low income, with rent levels based on social rent and set in relation to the GLA's published benchmarks set out in the Mayor's Affordable Homes Programme 2016-21 Funding Guidance.

141 At Stages 1 & 2 the affordable rent component of the proposed scheme comprised 40 units (135 habitable rooms) to be let at Richmond Affordable Rents. Following the Mayor's takeover of the scheme the affordable rent component was revised to comprise 84 units (247 habitable rooms) to be let at London Affordable Rent levels. The proposed London Affordable Rent units will have rent levels as set annually by the GLA, to be secured in the section 106 agreement. These are shown in Table 8 below. Eligibility for London Affordable Rent units would be restricted, based on local need and subject to a nominations agreement with the Council.

Table 8 - London Affordable Rents benchmarks

<b>Unit size</b>	<b>London Affordable Rent *</b>	<b>Market Rent **</b>	<b>Percentage of Market Rent</b>
1-bed	£159/week	£295/week	54%
2-bed	£169/week	£369/week	46%
3-bed	£178/week	£577/week	31%

\* London Affordable Rents are based on 2020-2021 benchmarks and are exclusive of service charges.

\*\* Market rents for TW9 are sourced from the GLA London Rents Map, which is based on 2018/2019 Valuation Office Agency data. To enable comparison, monthly market rents shown in the GLA Rents Map have been multiplied 12 and divided by 52 to provide estimated weekly rents.

142 The Shared Ownership units would be subject to the eligibility and household income requirements as set out in the Intend to Publish London Plan, to ensure that annual housing costs (including mortgage payments, rent and service charge) do not exceed 40% of net household income, assuming a maximum household income of £90,000 (as updated in London Plan Annual Monitoring Reports).

143 Richmond Council expressed concerns that the Shared Ownership units would not meet either the Borough's affordability requirement or Mayor's position in the London Plan Annual Monitoring Report. Following negotiations, the applicant has confirmed that these units would be affordable to households as set out below in Table 9, for the first three months of marketing and meet Richmond Councils expectations in relation to the household income cap. The Section 106 agreement would ensure priority is given to local residents and secure first marketing of the units at these affordability levels, with a cascade mechanism thereafter.

Table 9 – Affordability of shared ownership units based on estimated household income required

Unit size	Refused proposal	Current proposal	Difference
1-bed	£67,367	£47,000	- 30%
2-bed	£80,904	£47,000	- 42%

144 The Council also expressed concern over the affordability of the proposed London Living Rent (LLR) units. LLR levels are based on a third of average local household incomes and ward-level house prices. These units will be offered at GLA published levels for the ward, inclusive of service charges, and will be affordable to households with incomes that are lower than the upper limit for intermediate rent set out in the London Plan AMR. The Section 106 agreement will include further provisions to ensure the affordability of the LLR units by specifying that the rents (inclusive of Service Charges) are to be set by an Affordable Housing Provider in consultation with the Council and at the time of letting should both be not more than 80 per cent of the market rent of the property and shall be equal to or less than the LLR levels published by the GLA. For these reasons, the affordability of the intermediate tenure units is considered acceptable.

145 In its reasons for refusal the Council stated that the proposal failed to deliver the maximum reasonable amount of affordable housing. Whilst the overall offer falls short of Richmond’s planning policy requirement of 50% affordable with an 80:20 tenure split in favour of affordable rent, the revised affordable housing offer of 40% split 52:48 London Affordable Rent to intermediate products, provided at the affordability levels set out above, addresses a demonstrated need for affordable housing within the Borough, particularly with respect to family-sized units. Additionally, as stated in paragraph 139 above, the 35% affordable provision split of 60:40 in favour of London Affordable Rent over intermediate products complies with the Fast Track Route criteria in the adopted London Plan Policy 3.11, and the additional intermediate units satisfy Intend to Publish London Plan Policy H6B. On balance, this affordable housing offer is considered Fast Track eligible, is strongly supported, and is consistent with the policy goal of securing the maximum reasonable affordable housing contribution.

### Grant Funding

146 To be eligible for the ‘Fast Track Route’ the applicant must also have sought grant to increase the level of affordable housing, taking into account the Mayor’s strategic target of 50% affordable housing, in line with Policy H5 of the Intend to Publish London Plan and the Mayor’s Affordable Housing and Viability SPG.

147 The revised application would provide 40% affordable housing by habitable room with the inclusion of grant funding following the Approved Provider route, in line with the Mayor’s Affordable Homes Programme Funding Guide. The affordable housing offer is therefore based on the inclusion of grant at £28,000 per unit for the shared ownership and London Living Rent units and £60,000 per London Affordable Rent unit. This equates to a total grant figure of £7.532 million. In addition, the s106 agreement will allow for further improvements to the affordable housing offer should Richmond Council grant funding come forward in the future.



## Restrictions and Review Mechanisms

148 An early stage viability review will be secured within the Section 106 agreement, which would be triggered if substantial implementation (construction of the ground floor slab to the first floor of Block C) has not been achieved within two years of the permission being granted, in accordance with Policy H5 of the Intend to Publish London Plan and the Mayor's Affordable Housing and Viability SPG. The affordable housing offer meets policy requirements; however, should the early review mechanism be triggered, and a surplus identified, the Section 106 agreement ensures that additional affordable housing would be provided. Officers are satisfied that the review mechanism will incentivise delivery and secure an improved affordable housing offer should it not be implemented, in accordance with the Mayor's Affordable Housing & Viability SPG and Policy H5 of the Intend to Publish London Plan. As the proposal is eligible for the Fast Track Route, a late stage review is not required.

149 Occupational restrictions will be secured within the Section 106 which prohibit the occupation of any open market housing units prior to the practical completion of 50% of the affordable housing units in Block C, and prohibit the occupation for more than 50% of the open market units until an affordable housing provider enters into a nominations agreement with the Council in respect of the London Living Rents units.

## Conclusion on affordable housing

150 In response to concerns raised by the Mayor at both Stage 1 and Stage 2, the applicant has increased the affordable housing offer to 40% by habitable room through grant funding, which represents a significant improvement on the 35% proposed at Stage 2 and is strongly supported. For the reasons set out above, the increased affordable housing offer meets the GLA's Fast Track Route requirements in this instance. The proposed tenure split accords with the requirements set out in the Intend to Publish London Plan and Mayor's Affordable Housing & Viability SPG and the affordability levels proposed across each tenure would comply with the relevant requirement set by the NPPF, London Plan, and within the Intend to Publish London Plan. Also, as demonstrated above, the provision of London Affordable Rent is considered a significant improvement over the originally proposed Richmond Affordable Rent. The scheme is fully compliant with the criteria set out in Policy H5 of the Intend to Publish London Plan and the Mayor's SPG for following the Fast Track Route. The affordable housing will be secured in the Section 106 agreement including the terms of eligibility and affordability and an early stage review mechanism, should permission be granted.

151 On this basis, the application accords with London Plan Policies 3.3, 3.4, 3.5, 3.8, 3.9, 3.11 and 3.12, and the objectives of Richmond Local Plan Policy LP36 including the securing of the maximum reasonable amount of affordable housing. It is consistent with Mayor's Housing SPG (2016) and the Mayor's Affordable Housing & Viability SPG (2017). It accords with Intend to Publish London Plan objective GG4 and Policies D4, D5, D6, H1, H4, H5, H6 as set out above. The affordable housing offer is judged to be in overall conformity with the development plan taking account of the circumstances outlined above. It represents the maximum reasonable amount of affordable housing.

## Housing mix

152 London Plan Policies 3.8 and 3.9 state that new development should provide a mix of housing sizes and types, taking into account local and strategic housing requirements, the needs of different groups, and the strategic priority for affordable family housing provision. Policy H10 of the Intend to Publish London Plan states that schemes should generally consist of a range of unit sizes and sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. These include recognition that a higher proportion of one and two bed units may be more appropriate in locations closer to a town centre, station or with higher levels of public transport access and connectivity; and the role of one and two bed units in freeing up family housing. The Secretary of State Directions modify this latter point to have regard to “*the need for additional family housing and the role of one and two bed units in freeing up existing family housing*”.

153 Richmond Local Plan Policy LP35 states that development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate and that the housing mix should be appropriate to the site-specifics of the location.

154 The application, as amended, would provide 453 units, of which 280 would be private market sale units, and 173 would be affordable units, comprising 84 London Affordable Rent units, 34 Intermediate Shared Ownership units and 55 London Living Rent units. The housing mix would be as follows:

Table 10 - Proposed unit size mix

Unit size	Private market sale	London Shared Ownership	London Living Rent	London Affordable Rent	Total	Percentage
<b>Studio</b>	30	0	0	0	30	6.6%
<b>1-bed</b>	86	1	36	20	143	31.6%
<b>2-bed</b>	145	33	19	49	246	54.3%
<b>3-bed</b>	19	0	0	15	34	7.5%
<b>Total</b>	280	34	55	84	453	100%

155 The site is in a sustainable location in very close proximity to the railway station and bus routes where development should be optimised. In optimising the site a greater number of 1 and 2 bed units have been provided which will add to the local mix. Whilst the proposal only provides 7.5% 3-bed units, it also contains 123 2b4p units which could also be suitable for small families. As such, the unit size mix is considered acceptable given the sustainable location of the site and noting the context of the area which already comprises a large number of family sized dwellings.

156 As such, for the reasons given above, the housing mix is acceptable and in accordance with the London Plan Policy 3.8 and 3.9, Intend to Publish London Plan Policy H10, and Richmond’s Local Plan Policy LP35.

## Play Space

157 Policy 3.6 states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Further guidance is provided in the Shaping Neighbourhoods: Children and Young People’s Play and Informal Recreation SPG (2012), which sets a benchmark of 10 sq.m. of child play space to be provided per child. It states that play space for under-fives should be provided on site, within 400 metres for those aged 5-11, and for those aged 12 and over, within 800 metres. Policy S4 of the Intend to Publish London Plan states that residential developments should incorporate good quality, accessible play provision for all ages that is not segregated by tenure, of at least 10 sq.m per child. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided within an accessible and safe walking distance, and in these circumstances contributions to off-site provision may be secured by section 106 agreement.

158 At Stages 1 & 2 the proposed development included the provision of doorstep play space for children under 11 with offsite plays space proposed for older children. Owing to the constrained nature of the site the offsite provision with a contribution in lieu was accepted and the overall play space provision was considered appropriate. Following the Mayor’s takeover of the scheme alterations were made to the proposed unit size mix and the affordable housing provision grew rather significantly, which in turn altered the play space requirement. Based on the GLA Population Yield Calculator, the anticipated child yield of the proposed development now is as follows:

Table 11 - Proposed play space provision

<b>Age range</b>	<b>Anticipated child yield</b>	<b>Play space required</b>	<b>Play space proposed</b>
Under 5	73.1	731	721 sq.m.
5 – 11	50.8	508	505 sq.m.
Over 11	24.6	246	offsite
<b>Total</b>	<b>148.5</b>	<b>1485</b>	<b>1226 sq.m.</b>

159 Courtyards within the scheme have been rationalised to allow for the entirety of the proposed play space to be provided at ground level by way of 20-128 sq.m. “pockets” across the site. There is no provision on site for 12-15 year olds or 16 and 17 year olds; however, there are existing facilities within walkable distance (800m) for older age groups and it is accepted that in this case there are a number of facilities within the vicinity including North Sheen Recreation Ground and Raleigh Road Recreation Ground.

160 Although the proposal falls 13 sq.m. short of delivering the required 1,226 sq.m. on-site provision, because of the overall high quality of design and landscaping, which is to be secured by condition, GLA officers consider the proposed play space provision acceptable in this instance. A contribution towards the offsite provision of play space for children aged 12 and over will be secured in the section 106 agreement.



## **Housing Conclusion**

161 In summary, the scheme would deliver high-quality residential accommodation, including a significant proportion of affordable housing which would address an evidenced need both within the borough as well as within the wider London context. The proposed housing is therefore supported in line with London Plan Policies 3.3, 3.4, 3.6, 3.8, 3.9, and 3.11; and Intend to Publish London Plan Policies H1, H4, H5, H6, and H10. The proposal also accords with Richmond Local Plan Policy LP 35 and is in overall conformity with the development plan as a whole in respect of housing an affordable housing.

## **Urban Design**

162 The NPPF (at paragraph 124) states that good design is a key aspect of sustainable development. Paragraph 127 of the NPPF sets out a number of high level design objectives for new development, including the need to optimise the potential of a site; provide appropriate and welcoming layouts and landscaping; good architecture; establish a strong sense of place; and be sympathetic to local character while not preventing or discouraging appropriate change. Paragraph 130 of the NPPF states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

163 Chapter 7 of the London Plan and Chapter 3 of the Intend to Publish London Plan include a range of design principles and requirements for new development and are set out within specific policies on designing out crime (London Plan Policy 7.3 and Intend to Publish London Plan Policy D11); local character (London Plan Policy 7.4 and Intend to Publish London Plan Policy D1); public realm (London Plan Policy 7.5 and Intend to Publish London Plan Policy D8); architecture (London Plan Policy 7.6 and Intend to Publish London Plan Policy D3); tall and large scale buildings (London Plan Policy 7.7 and Intend to Publish London Plan Policy D9); accessible and inclusive design buildings (London Plan Policy 7.2 and Intend to Publish London Plan Policy D5); and heritage assets and views (London Plan Policies 7.8 and 7.9 and Intend to Publish London Policies HC1, HC2 and HC3).

164 Richmond Council's Local Plan Policy LP1 (Local Character and Design Quality) sets the Council's intention for all development to be of high architectural and urban design quality, and the character and heritage of the borough to be maintained and enhanced where opportunities arise. Policy LP 2 states that the Council will require new buildings to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights.

## **Design Scrutiny**

165 Intend to Publish London Plan Policies D2 and D4 establish that the higher the density of a development, the greater the level of design scrutiny that is required, particularly qualitative aspects of the design. Policy D4 identifies that proposals with a density of over 350 units per hectare or that include a tall building (as defined by the Borough, or above 30 metres), should be subject to a greater level of design scrutiny.

166 This scheme, as originally submitted, was considered in detail at pre-application stage, during the initial Stage 1 considerations by the Mayor, and by the Council in

reporting the application to Committee. Two design review panels were carried out in November 2018 and February 2019 as part of Richmond Council's assessment of the initial application. The Richmond DRP felt there was no justification for the height and massing proposed on the previous scheme, they questioned the form of the development, felt the layout could be improved and had concerns about the definition between the private and public spaces and lack of integration of affordable housing and North Sheen railway station.

167 Following the Mayor's takeover of the scheme the proposals were presented to the Mayors Design Advocates as part of the London Review Panel (LRP) Process to advise on the scheme's: urban design; height and massing; architecture; residential quality; public realm and landscape design. Meetings were held on five separate occasions: a formal review was conducted 20 September 2019, a surgery review was conducted 9 October 2019 (chair only), a second formal review was conducted 1 November 2019, a second surgery review was conducted 18 June 2020 (chair only), and a final review was conducted 22 July 2020. The scheme has evolved in an iterative manner in response to these consultations culminating in the amendments submitted on 31 July 2020.

168 In its final review, the Panel commended the design team for addressing the recommendations from the previous reviews and encouraged them to continue to develop the detailed designs beyond planning and into delivery. The Panel thoroughly supported the removal of Block E, which was introduced in the November 2019 revisions, and agreed that the reduction in floor to floor heights is helpful in minimising the impact of the proposed massing. The Panel also agreed that the enclosing of the cut-through in Block A to Manor Road is a positive move that creates a more legible, secure street edge and generous lobby space. The Panel further commended the design team for their development of the landscape proposals including improvements made since the last iteration, such as simpler path layouts and improved place space provision.

169 The Panel noted the change in material from stone to metal on the top floors of Blocks A, C, and D to improve the contrast with the brickwork below, and that this change was supported by Richmond Council. The Panel advised that the design team robustly detail the metal cladding to ensure that the design is delivered well. The applicant responded that the updated design of the top floor setback is demonstrated in the planning submission drawings and the addendum, and that high-quality, robust materials are to be selected for finish.

170 The Panel echoed concerns raised by Richmond Council over the proximity of windows to balconies, particularly in Blocks A and D. In response, the applicant team resized balconies and revised the fenestration to minimise overlooking from units onto adjacent balconies.

171 The Panel noted that the height and massing of some of the buildings had increased slightly in the latest iteration of the scheme and advised the design team to consider revising the bulk where possible to minimise their impact on the local context and heritage assets. The applicant team indicated that the surrounding context was carefully considered in the massing revisions with height increases proposed in areas of the site where they would have the least impact on neighbouring properties and views.

172 The applicant team furthermore sought to mitigate this impact through revisions to the architectural treatment, floor to ceiling heights, and materials palette: top floor

parapets were minimised across the scheme, floor-to-ceiling heights were reduced from 3300 mm to 3150 mm, and the top floor 'set back' detailing on Blocks A, C, and D was lightened to appear less heavy. A comparison between the original (February 2019) and amended schemes is demonstrated in Figure 6 below, taken from the Townscape and Visual Impact Assessment Addendum.



Figure 5 – Refused scheme (left) and Amended proposals (right) as viewed from Manor Road.

173 The Panel encouraged the team to explore design solutions to avoid overheating, rather than a relying on mechanical interventions. The applicant team reviewed comfort levels in all units and made design revisions including locating windows centrally within rooms, locating services and bathrooms towards the back of floorplans to minimise deep room arrangements, maximised the provision of dual aspect units, included Juliet balconies to allow for large openable areas and secure night-time ventilation, substituted balconies for winter gardens in high-noise areas, and fitted all units with MVHR units. Some MVHRs were also fitted with cooling coils to mitigate overheating where windows could not be opened due to background noise levels. The applicant further committed to reviewing overheating strategies at the detailed design phase to improve comfort levels without increasing residents' costs.

174 The Panel questioned the flexibility of the commercial units particularly in view of potential changes to the use class system and advised the applicant team to revisit the proposed delivery and servicing plan to better reflect what they termed as the likely reality of deliveries to the commercial units including the potential for deliveries from Manor Road. The applicant team noted that the proposed flexible floorspace (Use Class A1, A2, A3, D2, and B1) would all fall under the new Use Class E and that these units have been designed to ensure ongoing flexibility of use through the inclusion of comfort facilities and showers and layouts which support subdivision of spaces into smaller units. The applicant team also reviewed the servicing arrangement, concluding that the introduction of a loading bay along Manor Road is not practicable given its proximity to the level crossing and risk of pedestrian and vehicular conflicts. For this reason, the rear-approach servicing strategy was retained.

175 Finally, the Panel questioned the relationship between the proposed materials palette and the local context, advising the applicant team to clearly demonstrate how research into context and heritage informed the choice of materials. The Panel also encouraged the applicant team to test the tones of the proposed materials to avoid looking too grey, suggesting that the local context may serve as a useful precedent. In response, the applicant demonstrated that a contextual analysis of the surrounding



buildings informed the proposed materials palette. The analysis and details of the white/cream stone were included in the planning addendum.

### Design Scrutiny Conclusion

176 The proposal includes tall buildings above 30 metres requiring a greater level of design scrutiny in accordance with Intend to Publish London Plan Policy D4. Accordingly, and as outlined above, the proposals were subject to an extensive and iterative process of design scrutiny: twice by the Richmond Design Review Panel and five further times by the Mayor's Design Advocates. The scrutiny highlighted concerns around the height, massing, and materiality of the proposal and the scheme has evolved as a result of these comments, including the removal of Block E, simplification and rationalisation of the landscaping, redistribution and refinement of the massing, increased separation distances, revisions of the fenestration, and changes to the proposed materiality and architectural detailing. As a result, and as discussed in greater detail below, the proposed scheme provides a high standard of residential accommodation, including compliance with residential space standards, aspect, privacy and overlooking, daylight and sunlight, noise and vibration, and air quality. Additionally, the scale and massing are considered acceptable in this instance and the proposal is not considered to harm the setting, historic interest, or overall significance of heritage assets. The proposal is therefore considered to comply with Intend to Publish London Plan Policy D4.

### **Density**

177 London Plan Policy 3.4 requires new development to optimise housing output, having regard to site context and character, urban design principles and public transport capacity. Table 3.2 of the London Plan includes a sustainable residential quality (SRQ) density matrix which sets out broad density ranges by Public Transport Accessibility Level (PTAL) and setting; however, paragraph 3.28 of the London Plan states that it is not appropriate to apply density matrix mechanistically, and that other factors relevant to optimising housing potential ought to be taken into account for individual applications. Paragraph 1.3.51 of the Housing SPG (2016) states that it may be acceptable for schemes to exceed the ranges in the density matrix in appropriate circumstances, providing qualitative design and management concerns are addressed, including the requirement to achieve high quality design in terms of liveability, public realm, residential and environmental quality, and having regard to other factors such as the proposed housing mix.

178 Intend to Publish London Plan Policies D1-D4 place a greater emphasis on optimising the density of a site through a design-led approach, providing residents with safe, secure and inclusive environments that provide active frontages and appropriate outlook, privacy, and amenity whilst also having regard for the site's context, public transport access and infrastructure capacity. The Secretary of State's Directions propose additions to the Policy: "*The design of the development must optimise site capacity. Optimising site capacity means ensuring that development takes the most appropriate form for the site. Higher density developments should be promoted in areas that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.*"

179 The site has a PTAL of 5 and whilst the wider context is predominantly 'suburban', the site and its immediate surrounds could reasonably be considered 'urban' in

character. The London Plan density matrix guideline for an urban site with a PTAL between four and six is 200-700 habitable rooms per hectare or upwards of 260 units per hectare. The proposals would result in a residential density of 252 units (661 habitable rooms) per hectare, which is within the London Plan guideline density range for proposals on sites such as this one.

180 As discussed in the 'Design Scrutiny' section above, the current scheme has evolved in response to comments made through an iterative process of pre-application advice, public consultation, and professional scrutiny. Additionally, the scheme layout, massing, materiality, residential quality and housing mix have been improved in the July 2020 Amendments since the Mayor's decision to take over the Application. As such, it is considered that the proposal has been subject to an appropriate level of design scrutiny and, subject to the conditions and obligations set out above being secured in relation to pedestrian, cycle and inclusive access, residential and environmental quality, design, landscaping, play space and management, the application accords with London Plan Policy 3.4, Intend to Publish London Plan Policies D1-D4, as well as the Mayor's Housing SPG.

## **Layout**

181 The site is located in the Old Gas Works character area as defined by the Richmond and Richmond Hill Village Planning Guidance SPD. According to this guidance, the area has an irregular and ad hoc character, with no coherent frontage along Manor Road. This guidance identifies a lack of definition and coherence in street frontages as a threat, stating that should redevelopment opportunities come forward for appropriate uses there is an opportunity to re-plan and upgrade the public realm and achieve improvements to the visual appearance of the area.

182 The local context is varied with residential terraces to the east, a mix of residential terraces and purpose-built flatted blocks to the south and commercial buildings with some residential terraces and flats to the west. The site itself is bound by railway lines to the south and west, constraining its permeability and limited pedestrian and vehicular access to the east of the site from Manor Road.

183 In line with the development aspirations identified in the Richmond and Richmond Hill Village Planning Guidance SPD, a broad layout principle of this scheme was to enhance the street frontage along Manor Road utilising perimeter blocks to activate the ground level opening inward towards a new public square at the heart of the site. The decision to position this primary route into the site at the junction of Manor Road and Manor Grove creates a legible site entrance that serves as a continuation of the existing local street pattern and provides future residents with convenient access to North Sheen station. The proposal seeks to maintain the existing, separate vehicular access to the site further along Manor Road.

184 The site layout comprises a series of distinct blocks clustered around a new public open space at the heart of the site connected at ground level via landscaping. In the original proposal, ground floor commercial space flanked the public square and following the Mayor's takeover of the application these commercial units were relocated to the bases of Blocks A and D fronting onto Manor Road. Blocks A and D are set back from Manor Road to provide space for enhanced public realm and landscaping. This enhances and activates the Manor Road streetscape, creating an inviting and vibrant public space for members of the local community and commuters using North Sheen

Station. The original proposal also included a pavilion at the centre of the site. This was removed in later iterations of the scheme upon advice from the LRP to allow for a more generous and flexible public open space.

185 The scheme would provide between two and ten units per core, with dual lifts. Most of the cores would serve eight units or less, save for one Block A core and one Block D core. Given the overall residential quality, and the limited occurrence of cores serving more than eight units, this is acceptable in this instance and is considered to meet the standards set out in the Mayor's Housing SPG and in Intend to Publish London Plan Policy D4, which aim for a maximum of eight units per core.

186 Following the Mayor's takeover of the scheme an additional block, Block E, was introduced at the northern tip of the site atop the bus layover in an effort to bolster the proposal's affordable housing offer; however, this block was subsequently removed over concerns around site constraints in this location.

187 The proposed layout represents a sensible and appropriate response to the local context and approach to optimising the site's capacity. Notable benefits of the proposals are the provision of active frontage, a high-quality public realm, urban greening and connections to Manor Grove existing street pattern for the main pedestrian access to the site and public space. For these reasons, the proposed layout is supported in line with London Plan Policy 7.5 and Policy Intend to Publish London Plan Policy D3.

### Landscaping

188 The landscaping proposal was revised following the Mayor's takeover of the application and in response to advice from the Mayor's Design Advocates. These revisions include a reorganisation of the pathway network to respond to desire lines and provide more coherent routes to residential entrances, a rationalisation of the courtyard spaces to maximise the provision of usable amenity space and play space, simplification of some of the proposed planting over concerns about long term maintenance.

189 The proposed landscaping would result in a net gain of trees on site including the planting of 141 new trees. The latest iteration of the scheme including the removal of Block E would also allow for an increase in tree retention in the northern corner of the site. A rich mix of ornamental planting, grassland, green walls, and hedges are proposed which would help meet urban greening objectives and address air quality issues. Subject to details of planting, hard surface treatments and street furniture, the landscaping proposals would ensure a high-quality setting for the proposed buildings

### **Height, Massing, and Townscape**

190 In its reasons for refusal Richmond Council stated that the proposal development, by reason of its siting, layout, height, scale, bulk, design and materials is considered to represent a visually intrusive, dominant and overwhelming form of overdevelopment to the detriment of the character of the site and surrounding area; the setting of the Sheendale Road Conservation Area and nearby Buildings of Townscape Merit, and the visual amenities of nearby occupants. Similar opinions are echoed in several of the letters of objection.

191 Following the Mayor's decision to take over the application, the proposals were subject to further design scrutiny as GLA officers worked with the applicant to secure



design revisions. During this process an additional block, Block E, was proposed on the northernmost corner of the site atop the bus layover. While the addition of this block allowed for an improvement in the affordable housing offer, concerns were raised over the general layout of the building. Options were then considered to remove Block E and increase massing elsewhere on the site in order to resolve outstanding concerns whilst still providing significant improvements in the affordable housing offer. Figure 7 below demonstrates the redistribution of this massing.

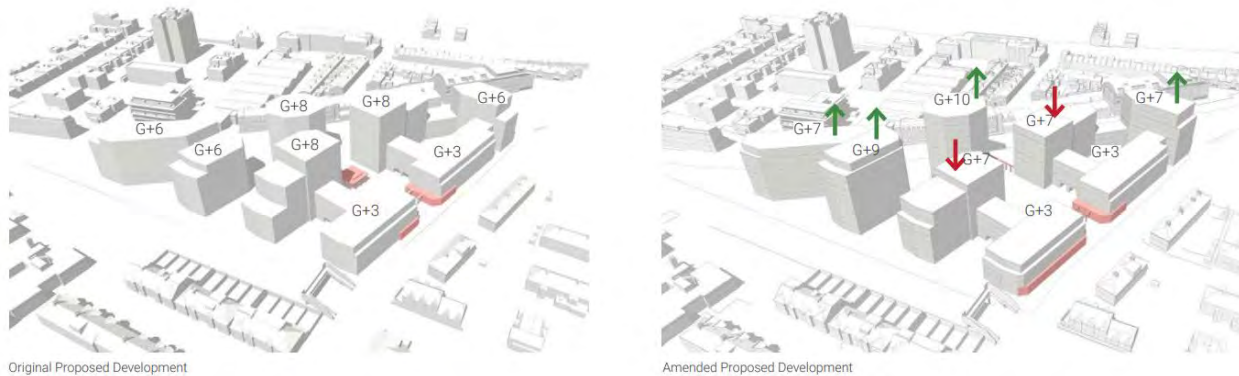


Figure 6 – Original scheme submitted to Richmond Council (left) and current proposal (right) heights and massing

192 The changes were as follows:

- An additional storey was added to Block A, Core A;
- Two additional storeys were added to Block B;
- An additional three storeys were added to Block C, Core A;
- An additional storey was added to Block C, Cores B and C;
- A storey was removed from Block A, Core D;
- A storey was removed from Block D, Core B; and
- Floor to ceiling heights were reduced from 3300 mm to 3150 mm.

### Tall Buildings Policy

193 According to paragraph 7.25 of the London Plan, tall buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline, or are larger than the threshold sizes set for the referral of planning applications to the Mayor. Based on this definition, the proposal includes the provision of tall buildings. Richmond Local Plan Policy LP 2 identifies a tall building as 18 metres in height or higher.

194 London Plan Policy 7.7 and Intend to Publish London Plan Policy D9 indicate that tall buildings should be part of a plan-led approach and not have an unacceptably harmful impact on their surroundings. In terms of location, Policy 7.7 states that tall buildings should be generally limited to the Central Activities Zone, opportunity areas, and areas of good access to public transport but leaves scope for tall buildings to be considered in other locations outside of these areas, subject to urban design analysis and compliance with the criteria set out in Policy 7.7. To accord with these criteria, tall buildings should:

- be located in areas whose character would not adversely be affected;
- relate well to the surrounding buildings, urban grain and public realm, particularly at street level;

- improve the legibility of an area and enhance the skyline;
- incorporate the highest standards of architecture and materials;
- provide active ground floor activities that provide a positive relationship to the surrounding streets;
- contribute to improving the permeability of the site and wider area, where possible;
- incorporate publicly accessible areas on the upper floors where appropriate;
- make a significant contribution to local regeneration;
- not adversely affect their surroundings in terms of microclimate, wind, overshadowing, noise, glare, or give rise to interference with aviation or telecommunication infrastructure; and,
- not adversely impact local or strategic views.

195 Policy D9 of the Intend to Publish London Plan states that applications for tall buildings should be subject to design scrutiny and encourages boroughs to proactively identify locations where tall buildings will be considered suitable.

196 In their Local Plan, Richmond Council defines a 'Tall Building' as one that is 18 metres in height or higher. This is separate from a 'Taller Building' which is defined as being significantly taller than the neighbouring buildings, but less than 18 metres in height (below six stories). Local Plan Policy LP 2, which addresses building heights, states that proposals for Tall or Taller Buildings require full design justification based on a comprehensive townscape appraisal and visual assessments and will only be acceptable where these demonstrate that no material harm is caused to interests of acknowledged importance. Moreover, proposals for Tall or Taller Buildings should positively contribute to the streetscape by means such as creating high quality public spaces that deliver wider public realm benefits or incorporating uses that enable local communities and the public to access the ground level of buildings. According to this policy, design consideration should also include matters relating to height, scale, massing, alignment, silhouette, crown, style, facing material, and use. Supporting text 4.2.2. of this policy indicates that the potential for 'tall' buildings is generally clustered close to Richmond and Twickenham stations, and that 'tall' or 'taller' buildings are likely to be inappropriate and out of character with the exception of limited sites around existing 'tall' or 'taller' buildings including Richmond upon Thames College, Twickenham Rugby Stadium, Teddington Studios, and Mortlake Brewery.

#### Assessment Against Tall Buildings Policy

197 Based on the criteria of a 'tall building' set forth in both the London Plan and Richmond Local Plan all four blocks in this scheme could reasonably be considered tall buildings. Intend to Publish London Plan Policy D9, which does not form part of a statutory development plan but is a material consideration, places the onus on boroughs to determine appropriate locations for tall buildings. While Richmond Local Plan Policy LP 2 does not specifically indicate appropriate or inappropriate locations for tall buildings, as noted above, the supporting text for this policy does demonstrate a resistance to the development of tall buildings within the borough apart from certain locations.

198 London Plan Policy 7.7 contemplates that tall buildings might be developed in areas outside of those identified as appropriate within a borough's local development framework, instructing that such applications should include an urban design analysis

which demonstrates that the proposal is part of a strategy that will meet a defined set of criteria. The proposed development is assessed against these criteria in detail in the subsequent paragraphs.

### *Visual impact and views*

199 The submitted Townscape and Visual Impact Assessment (TVIA) Addendum provides 14 representative views of the proposals in long-range, mid-range and immediate views in line with Intend to Publish London Plan Policy D9. These views are referenced in the subsequent paragraphs.

200 Following the July 2020 revisions, the tallest element of the scheme is Block B at 11-storeys. This block is situated towards the centre of the site furthest away from any neighbouring properties. The applicant's approach positioning the tallest element towards the centre of the site would allow Block B to serve as a visual terminus for sightlines viewed from along Manor Grove and create a legible backstop to the new section of public realm at the heart of the site. Studies undertaken by the applicant during the design process demonstrated that this approach would minimise the development's impact on sensitive views along Manor Road and Manor Grove. This view is represented in the TVIA as Representative View 1, which the assessment concludes would be subject to a moderate and neutral impact. GLA officers concur with this assessment.

201 The building heights step down from Block B to eight storeys and then four storeys in Blocks A and D as they approach Manor Road. Articulating the building heights in this manner would create a clear visual hierarchy, both framing the new section of public realm and moderating the step change between the taller elements of the proposal and the existing two-storey houses across Manor Road. The resultant impact of the proposal on Manor Road is captured in Views 2, 10, and 11; the assessment concludes that the proposal would result in minor to moderate beneficial impact on views 2 and 10 and moderate beneficial impact on view 11. GLA officers concur with this assessment.

### *Sensitive areas*

202 London Plan Policy 7.7 E instructs that the impact of tall buildings proposed in sensitive locations, which might include conservation areas and World Heritage Sites, should be given particular consideration. As the proposed development is located near the Sheendale Road Conservation Area and within the wider vicinity of the Sheen Road Conservation Area, Grade II\* Listed Hickey's Almshouses and the Royal Botanic Gardens Kew World Heritage Site, this additional consideration is warranted.

203 Views 4 and 12 within the TVIA are taken from within the Sheendale Road Conservation Area north west of the site. The TVIA concludes that the proposal would have a moderate and neutral impact on these views. In assessing views from inside the conservation area GLA officers consider that the proposed development would only be visible from certain vantage points wherein it would be seen the context of other contemporary buildings. For this reason, GLA officers concur that the impact would be neutral.

204 Views 9, A1, and A2 are taken from the Royal Botanic Gardens Kew Heritage Site. The TVIA concludes that the proposal would have a minor and neutral impact on View 9 and no impact on views A1 and A2. As the proposal would not breach the skyline when



viewed from this vantage point and would comprise part of an existing and varied built context, GLA officers consider that the proposed buildings would have a neutral effect in View 9. GLA officers also concur that the proposal would not be seen in views A1 and A2 and therefore would have no impact on these views. Full detail of the assessment of these views can be found within the heritage section of this report.

205 View 3 is taken from the Hickey's Almshouses within the Sheen Road Conservation Area. This view demonstrates that the proposed development would not be visible from this vantage point and therefore GLA officers consider that the proposal would have no impact on the conservation area or almshouses.

### *Character and appearance*

206 In its reasons for refusal, Richmond Council cited the height, scale, and bulk of the proposed buildings, asserting that they represent a visually intrusive, dominant, and overwhelming form of overdevelopment. Several letters of objection received in response to the public consultation cited similar concerns.

207 As stated above in paragraph 194, London Plan Policy 7.7 instructs that tall and large buildings should only be considered in areas where they would not adversely affect the character and appearance of the surrounding area. Paragraph 7 above recognises that the existing character of the site and surrounding area is variable, comprising a mix of commercial and residential uses in buildings of up to 11-storeys that vary in age, quality, and character. Additionally, this triangular site is segregated from its wider context on two sides by rail and road infrastructure, and on the third side by a three-lane road.

208 The NPPF in paragraph 127 states that development must make the best use of land through a design-led approach; a principle which is echoed in Intend to Publish London Plan Policy D3. Whilst it is noted that Policy D3 should be afforded reduced weight owing to the SoS Directions, the principle of this approach has not been questioned and moreover, the SoS directed that text be added to the policy which promotes higher density development in areas that are well connected to jobs, services, infrastructure, and amenities by sustainable transport; characteristics which is true of this particular site.

209 The site is within the Old Gas Works Character Area. The Richmond and Richmond Hill Village Planning Guidance SPD states that there is a lack of definition and coherence in street frontages in the Old Gas Work Character Area due to the proliferation of small industrial yards and car parks, and should redevelopment opportunities come forward there is an opportunity to re-plan and upgrade the public realm including improvements to the visual appearance of the of the area. The proposal, which introduces active frontages and an upgraded public realm along Manor Road in place of the existing surface car park and a new section of high-quality public realm at the heart of the site, therefore accords with the area objectives set forth in the SPD and would improve immediate views of the site.

210 In view of the existing character of the area and process of rigorous design scrutiny undergone by the proposal, GLA officers are satisfied that the proposed heights and massing of tall buildings present a sensitive response to the existing context, that the materiality and architectural detailing draw upon the local vernacular, culminating in a positive relationship with the existing context, particularly along Manor Road. For these

reasons, GLA officers do not consider that the proposals will have an adverse effect on the character or appearance of the site's context and the massing and height of the proposed buildings are considered appropriate.

### Tall Buildings Conclusion

211 In summary, a thorough assessment of the proposal's impact on the townscape, local character, skyline, and heritage assets demonstrates that the proposed buildings, being of high-quality architecture and materials, would not result in undue harm. Moreover, the proposal would result in enhancements to the current streetscape along Manor Road and deliver additional benefits, discussed in further detail in subsequent sections of this report. The proposal is likewise considered to accord with Local Plan Policy LP 2 and London Plan Policy 7.7.

## **Residential Quality of Future Occupiers**

### Internal and Private Amenity Space

212 Table 5.1 of the Local Plan, Table 3.3 of the London Plan and Table 3.1 of the Intend to Publish London Plan set minimum internal space standards for new homes. In terms of ceiling height, all units would comply with the 2.5 metre standard set out in the Intend to Publish London Plan and strongly encouraged in the London Plan and Housing SPG. Having assessed room layouts, GLA officers consider these would provide a good quality of accommodation and provide policy compliant levels of storage space.

213 The Housing SPG and Intend to Publish London Plan Policy D6 state that a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings, with an extra 1 sq.m. for each additional occupant; and the depth and width of outdoor space should be at least 1.5 metres. Paragraph 2.3.32 of the Housing SPG recognises that there may be exceptional circumstances where site constraints mean that it is impossible for private external amenity open space to be provided, in which case dwellings may be provided with additional equivalent living space. In this case private amenity space is provided for each unit in the form of external balconies, terraces or gardens. Each balcony or terrace is a minimum of 1.5 metres deep in accordance with policy guidance. The proposed units are therefore supported in accordance with London Plan Policy 3.5, Intend to Publish London Plan Policy D6, and Richmond Local Plan Policy LP36.

### Privacy, Outlook and Sense of Enclosure

214 London Policy 7.6 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, including privacy. Intend to Publish London Plan Policies D3, D6, and D9 state that development proposals should achieve appropriate levels of privacy. The Housing SPG states that design proposals should demonstrate how habitable rooms are provided with an adequate level of privacy in relation to neighbouring properties, the street, and other public spaces. While it identifies that a minimum distance of 18–21 metres between habitable rooms can be used as a benchmark it advises against setting rigid separation distances, noting that “in the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18-21 metres between habitable rooms. Whilst these can still be useful yardsticks for visual privacy, adhering rigidly to these





## Dual Aspect

217 The Housing SPG states that development should minimise the number of single aspect units and avoid the provision of single aspect units that are north facing; contain three or more bedrooms; or are exposed to noise levels above which significant adverse effects on health and quality of life occur. Intend to Publish London Plan Policy D6 states that development should maximise the provision of dual aspect units; and normally avoid the provision of single aspect units, which should only be provided where they provide an acceptable quality of accommodation in terms of passive ventilation, daylight, privacy, and avoiding overheating.

218 Following advice from the Mayoral Design Advocates revisions were made to the scheme, in particular to Blocks A and D, which further decreased provision of single aspect units from 44% to 39%. The provision of dual aspect units is now considered to be maximised and the scheme no longer contains north-facing single aspect units. The Applicant's overheating assessment identifies mitigation measures in response to the overheating risk. As discussed further in the energy section below, these measures include passive and mechanical ventilation which would sufficiently safeguard units from overheating.

## Daylight/Sunlight and Overshadowing

219 London Plan Policy 7.6 requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, including light and overshadowing. Intend to Publish London Plan Policy D6 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context. Richmond Local Plan Policy LP 8 states that all development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties, instructing that good standards of daylight and sunlight to be achieved in new development.

220 GLA officers commissioned an independent daylight, sunlight and overshadowing analysis from TFT consultancy to review the findings of the updated Daylight, Sunlight, and Overshadowing report submitted by the Applicant following the July 2020 amendments to the proposed scheme. That independent review has informed the assessment of these issues in this report.

221 The Average Daylight Factor (ADF) method was used to consider whether the new habitable rooms within the propose development would receive an adequate level of daylight. The results of this analysis indicated that the proposed development would generally achieve acceptable levels of daylight in line with expected values for a scheme of this density. The TFT review did note one area of concern, which is that lower floor courtyard-facing units in Block A may include some poorly lit spaces as a result of the balconies overhead, noting that more information on these rooms would be helpful in further understanding the daylight implications. This result is not entirely unexpected, as there is always a balance to be struck between the provision of private outdoor amenity space and daylight penetration into lower floor units, and in this instance considering that 69% of units are expected to comply with BRE target values, that balance is considered acceptable.

## **Detailed Design and Architecture**

222 London Plan Policy 7.6 requires buildings to be of the highest architectural quality and comprise materials which complement rather than necessarily replicate local architectural character. Intend to Publish London Plan Policy D1B further states that a design-led approach should be used for optimising site capacity through attention to the form and layout, experience and quality and character of a development. Intend to Publish London Plan Policy D2 also details the approach to design scrutiny, including design review panels, to ensure good design. Richmond's Local Plan Policy LP 1 (local character and design) requires high architectural quality.

223 The development demonstrates an excellent quality of architectural design. Richmond raised no objection to the choice of individual materials in the original application but were concerned about the lack of contrast (particularly to Manor Road and Block C) in materials, in combination with the uniformity of design, are considered to exacerbate the scale and mass of the buildings.

224 The proposed materials comprise of brick, stone and metalwork. The link blocks, town houses and public square facing buildings are proposed in a grey brick responding to the nearby Sheendale Road Conservation Area. The Manor Road frontage and Block C are proposed in red brick and red stone Notwithstanding this point, should this application be approved, further details of materials could be secured through conditions.

225 It is noted that the applicant has proactively engaged with and responded positively to the recommendations of London Design Review Panel. Through this process the applicant has amended the elevation design to create a defined hierarchy, enforced design rules to ensure consistency of details across buildings established and made the use of balconies and balcony design consistent across scheme. GLA officers have welcomed the improvements to the design of the scheme, which complies with the thrust of London Plan and local policy aspirations.

## **Designing out crime**

226 Policy 7.3 of the London Plan seeks to ensure that the principles of designing out crime are integrated in the design of new development to promote a sense of security without being overbearing or intimidating. The criteria in Policy 7.3 requires new development to provide legible, convenient and well-maintained movement routes and spaces which are well-overlooked and benefit from an appropriate level of activity, with private and communal spaces clearly defined to promote a sense of ownership. Richmond Councils Security by Design SPG (2002) set out the borough's requirements for design and layout.

227 Intend to Publish London Plan Policy D11 further states that development proposals should be designed to ensure that measures to design out crime are inclusively and aesthetically integrated into the public realm.

228 There is no ambiguity about access to the proposed amenity spaces as the public realm has no barriers to pedestrian access and the private amenity spaces are only accessible to residents, ensuring its security. Vehicular access to the central public realm is prevented by bollards, providing safety whilst allowing pedestrian and cycle access including by disabled people. Residential core entrances would be well

distributed and whilst there are some areas of servicing, cycle and refuse storage on the ground floor, these would be minimised and broken up by residential entrances and commercial uses to ensure that the public realm feels vibrant and safe to use, maximising active frontages across the site. The commercial uses fronting onto the public realm and Manor Road will encourage activity during the day, whilst at night the public realm would be well-lit and well overlooked by residential properties. The maintenance plan for the public areas will form part of the requirements of the S106 agreement for any planning permission.

229 The Metropolitan Police has raised no objections to the application subject to a condition securing Secure by Design accreditation. As such, the proposals are acceptable with respect to designing out crime and comply with London Plan Policy 7.3 and Richmond's Security by Design SPG, as well as Intend to Publish London Plan Policy D11.

## **Noise and Vibration**

230 Paragraph 180 of the NPPF states that new development should ensure that potential adverse impacts resulting from noise are mitigated or reduced to a minimum; and noise levels which give rise to significant adverse impacts on health and the quality of life are avoided. Further guidance is provided in National Planning Practice Guidance (NPPG) and the Noise Policy Statement for England (NPSE) (2010).

231 While the NPPG and NPSE do not provide decision makers with technical or numerical values for categorising and assessing noise levels in decibels (dBs), industry standard guidelines set out in British Standard BS8233:2014 'Guidance on sound insulation and noise reduction for buildings' recommends that daytime noise levels do not exceed 35dB and night-time values in bedrooms do not exceed 30dB. This is aligned with the World Health Organisation recommendations set out in Guidelines for Community Noise (1998). With regard to external private and communal amenity spaces, British Standard BS8233:2014 recommends that external noise levels do not exceed an upper guideline value of 55dB.

232 London Plan Policy 7.15 and Policy D14 of the Intend to Publish London Plan state that development should manage noise to improve health and quality of life by avoiding significant adverse noise impacts on health and quality of life; mitigating and minimising existing and potential adverse noise impacts within the vicinity of new development; separating new noise sensitive development from major noise sources through the use of screening, internal layout, set back distances; and where this is not possible, adverse effects should be controlled and mitigated by incorporating good acoustic design principles. The Mayor's Environment Strategy aims to reduce the number of people adversely affected by noise and includes policies and proposals to support this aim.

233 Richmond Local Plan Policy LP 10 in relation to noise seeks to encourage good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected. The Development Control for Noise Generating and Noise Sensitive Development SPD sets guidance for internal noise levels in line with British Standard BS8233, recommending that daytime noise levels do not exceed 35-40 dB and night-time levels in bedrooms not generally exceed 30 dB.

234 The applicant has provided a Noise and Vibration Impact Assessment that reports the likely noise and vibration effects of the proposed development. The assessment



considers noise and vibration occurring from road traffic, the railway lines, building services and the bus layover.

235 An acoustic survey was undertaken between the 20th July and 25th July 2018. This survey comprised of six days of unattended sound measurements by a single sound level meter with additional attended short-term sound measurements taken at various locations across the site. This survey was undertaken to inform the proposals for the original scheme and validate a specialist acoustic model of the existing site. The survey indicated that the site is exposed to relatively high levels of environmental sound, primarily governed by road and railway traffic activity in the local area, and that these sound levels do not vary significantly from day to night-time. As the survey area conditions have not materially changed since the survey was undertaken the results remain valid.

236 An assessment was undertaken to understand the implications of the existing sound environment on the design of the façade and ventilation of the proposed buildings. This assessment found that the sound reduction performance of the external façade will be controlled by the performance of the glazing and that facades overlooking the road and railway lines will require high-performance, double glazed window systems in the region of 45 dB Rw. The assessment also found that mechanical ventilation with air tempering is likely to be required for most of the development, with openable windows for purge ventilation. Additional work was done understand the impact of plant noise emissions on the site. This work indicates that guideline plant noise emission limits have been derived within local authority requirements, are not considered particularly onerous, and should be readily achieved with appropriate mitigation measures which can be enforced by a suitably worded planning condition.

237 Vibration measurements were undertaken at several ground floor locations, in line with the proposed facades of buildings across the development. The results of these measurements indicate that vibration levels on site from railway sources are below the threshold required by the Council and BS 6472:2008 of low probability for adverse comment. As such, perceptible vibration and re-radiated sound from ground-borne vibration is not expected to require mitigation.

238 Based on the information provided in the Noise and Vibration Impact Assessment it is considered that any material impacts on the proposed development can be adequately addressed during the detailed design stages. A condition is recommended to ensure that details of sound insulating façade materials and suitable soundproofing including acoustic performance glazing is installed between second floor residential units and the commercial floorspace below. Conditions should also be added to any consent restricting the hours of operation of any outside seating associated with the potential flexible A3 cafe use and requiring details of any ventilation equipment or plant to be submitted for approval to ensure it has satisfactory noise attenuation to avoid disturbance to residential occupiers.

## **Heritage**

239 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “*should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*”.

240 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Any harm or loss of significance of a designated heritage asset requires clear and convincing justification. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In every case, great weight should be given to the conservation of heritage assets.

241 London Plan Policy 7.8 and Policy HC1 of the Intend to Publish London Plan state that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. London Plan Policy 7.10 and Intend to Publish London Plan Policy HC2 state that development should not cause adverse impact to World Heritage Sites or their setting, (including buffer zones), and should not compromise a viewer's ability to appreciate Outstanding Universal Value, integrity, authenticity and significance. Further guidance is provided in the Mayor's supplementary planning guidance 'London World Heritage Sites - Guidance on Settings'.

242 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case tells us that "Parliament in enacting section 66(1) did intend that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise." The case also makes it clear that there is a strong presumption against granting planning permission that would harm the character and appearance of a conservation area.

243 Richmond Local Plan Policy LP 3 requires development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Policy LP 4 requires Buildings of Townscape Merit (BTM) to be preserved, and where possible enhanced.

244 The application site does not lie within a conservation area, nor does it contain any statutory or locally listed buildings. It is, however, located approximately 100 metres east of the Sheendale Road Conservation Area and approximately 150 metres northwest of the Sheen Road Conservation Area. Kew Gardens is also located to the north of the site and is a World Heritage Site. There are local Buildings of Townscape Merit opposite the site on Manor Road as well as approximately 100 metres to the north east on Trinity Road and St George's Road. The site does not lie within any strategic views as identified within the Mayor's London View Management Framework SPG.

245 The following sections of this report consider the impact of the development on the significance of heritage assets, having regard to the statutory duties and local, strategic and national policy tests set out in this report.

### Royal Botanical Gardens Kew World Heritage Site

246 The proposal is located south of Royal Botanical Gardens Kew, which is a World Heritage Site, Registered Park and Garden (Grade I) and Conservation Area.

247 The proposal was assessed in views from the top of the Grade I listed Pagoda, the Boardwalk (view A1) and Cedar Vista (view A2). The assessment demonstrates that while the uppermost parts of the development would be visible from the top of the Pagoda (recently opened to the public), it would not breach the skyline and would be read as only a small part of a panorama across West London, showing development from all periods. Furthermore, the proposed development would be imperceptible within views from the Boardwalk and Cedar Vista (see Figure 8 below) resulting in a negligible and neutral effect. That notwithstanding, Kew raised concern that the removal of any trees right of the Pagoda in view A2 would reveal a corner of Block A, resulting in harm to the integrity and authenticity of key attributes of the site.



Figure 8 - Views A1 (left) and A2 (right)

248 Having considered these views, GLA Officers are satisfied that while the proposed development would be perceptible from the top of the Pagoda, it would be read as part of a wider, varied panorama and would therefore not result in any harm. In terms of the ground level vantage points, the proposed development would be imperceptible under most circumstances from views A1 and A2 and therefore would cause no harm to the significance of Royal Botanical Gardens Kew World Heritage Site, or its overlapping Registered Park and Garden or Conservation Area designations.

### Conservation areas

249 The application site is within the vicinity of the Sheendale Road and Sheen Road Conservation Areas and consequently a Heritage Assessment and a Townscape and Visual Impact Assessment (TVIA) have been submitted in support of the application.

250 As mentioned above, the Sheendale Road Conservation Area, lies north west of the site and comprises a formal group of mid-nineteenth century semi-detached 'miniature villas' along Sheendale Road with two outlying villas on Crown Terrace. The Crown Terrace villas back onto the Sheendale Road properties and are connected to via Dee



Road. The heritage significance of this conservation area is derived from the unique architecture of the villas and the streetscape along Sheendale Road.

251 The villas are currently set amongst newer housing blocks of varying ages and architectural quality, as shown in Figure 9 below. Alterations to the doors and windows of several of the villas and publicly viewable extensions to two of the villas closest to the application site has diminished their architectural unity.



Figure 9 - Sheendale Road Conservation Area, currently.

252 Owing to the orientation of the streets, the proposed development would not be visible from most of Sheendale Road and therefore is not considered to harm the significance of its streetscape. As demonstrated in Figure 10 below, the proposed development would be visible in views along Dee Road looking east from Sheendale Road; however owing to the separation distance, prevalence of existing modern buildings of mixed quality and character, the poor quality alterations to the two villas closest to the application site and the high architectural quality of the proposed development, GLA officers consider that no harm would be caused to the significance of the setting on the Sheendale Road conservation area.



Figure 10 - Original submission (left) and current proposal (right) as viewed from Dee Road

253 Sheen Road Conservation Area is located south of the site and includes numerous Victorian terraces and villas, several of which are of group value and identified by Richmond Council as Buildings of Townscape Merit. The most significant buildings within this conservation area are the (separately) Grade II\* Listed Hickeys Almshouses. Owing to its siting and distance from the application site, the proposed development will not be seen from public vantage points within the Sheen Road Conservation Area. As such, no harm would be caused to the significance of the conservation area from impact on its setting.

#### Listed buildings

254 As the proposal is not within a conservation area or near to a listed building, the applicant has carried out a Heritage Assessment and a Townscape, and Visual Impact Assessment (TVIA). There are no statutorily listed buildings within close proximity of the site, the nearest being the Grade II\* listed Hickey's Almshouses. As evidence by the TVIA, the proposals would not be clearly visible above the almshouses and therefore would have no impact on these statutory listed heritage assets. Other listed buildings in Richmond are located some distance from the site so the proposal would not be visible from the settings of these heritage assets.

#### Locally Listed Buildings and Registered Parks and Gardens

255 The proposal is located south of Royal Botanical Gardens Kew World Heritage Site, which is also Registered Park and Garden (Grade I). The proposal's impact on Kew Gardens has been assessed above.

256 The proposals are near non-designated Buildings of Townscape Merit (BTM) located opposite at Manor Road and also to the northeast at Trinity Road and St George's Road. These BTMs have mostly been significantly altered through permitted development rights and their character compromised considerably in some cases. It is considered that the Trinity Road and St Georges BTMs are adequately separated from the site so as not to result in harm to their setting. It is accepted that development would result in a significant change in the setting of the Manor Road BTMs. These are non-designated assets and the change is considered to be an enhancement as a result of the Manor Road frontage being completed with buildings of appropriate scale along this edge. Officers are therefore satisfied that there would be no harm to the significance of these or any other locally listed buildings as a result of the proposals.

#### Archaeology

257 The site is not located within an archaeological priority area and Historic England (Archaeology) had no comments on the proposals.

#### Conclusion on heritage assets

258 GLA officers conclude that the proposals would not harm the setting or historic interest, and so the overall significance of heritage assets. The application is therefore considered to be in accordance with the NPPF; London Plan Policies 7.4, 7.6, 7.7 and 7.8; Intend to Publish London Plan Policy HC1; and Richmond Local Plan Policies LP 3 and LP 4. In coming to this conclusion, GLA officers have taken account of the statutory duties contained in the Planning (Listed Buildings and Conservation Areas) Act 1990.

## **Fire Safety**

259 Policy D12 of the Intend to Publish London Plan seeks to ensure that development proposals achieve the highest standards of fire safety and to ensure the safety of all building users. Policy D5 requires as a minimum at least one lift per core to be a suitably sized fire evacuation lift appropriate for use to evacuate people who require level access from the building.

260 Accordingly, a Fire Strategy prepared by chartered fire engineers at Hoare Lea Consultants has been submitted alongside the planning application. In line with Policy D12, the Fire Strategy includes details of the design, construction materials, construction methods, and management regulations to be implemented to ensure that adequate protection would be provided to limit the spread of fire within the buildings and satisfy the appropriate classification stated within BS 9991:2015. An escape strategy, details of means of evacuation for all building users and specific measures to reduce the risk to life from fire have been provided including confirmation that firefighting lifts will be programmed to also be used as evacuation lifts. Access to the site for fire engines and service personnel would be from the main vehicular access into the site with another access provided opposite Manor Grove via the main pedestrian route through the site. Whilst the Fire Strategy is considered to accord with Intend to Publish London Plan Policies D5 and D12 in terms of broad content, the fire safety strategy of the buildings would be considered at a later stage outside of the planning process and also secured through planning condition.

## **Inclusive design**

261 London Plan Policy 7.2 and Intend to Publish London Plan Policy D3 require all future development to meet the highest standards of accessibility and inclusion, and that the design process has considered how everyone, including those with disabilities, older people, children and young people, will be able to use the places and spaces that are proposed. London Plan Policy 7.6 expects that buildings and structures meet the principles of inclusive design; and London Plan Policy 3.8 sets out requirements to meet Building Regulation requirement M4(2) and M4(3). Intend to Publish London Plan Policy D7 requires that at least 10% of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings'; and that all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. Planning Practice Guidance states that Local Plan policies for 'wheelchair accessible' (already adapted) homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling, otherwise M4(3) dwellings should be 'wheelchair adaptable'. Intend to Publish London Plan Policy T6.1 states that residential development should ensure that one disabled persons parking bay should be provided for 3% of dwellings from the outset, and a Parking Design and Management Plan, should demonstrate how an additional 7% of dwellings could be provided with a designated disabled persons parking space upon request should existing provision be insufficient. Richmond Council's Local Plan Policies LP35 and LP30 on accessibility promote accessible and inclusive design and reflect the requirements of the London Plan.

262 Details of accessible and inclusive design have been provided within the Addendum to the Design & Access Statement which focuses on the inclusive design measures within the public realm and buildings. The application drawings and landscape drawings also show how key inclusive design features would be incorporated.



## Accessible homes

263 90% of the residential units would be designed to meet Building Regulation requirement M4(2), with the remaining 10% designed to meet Building Regulation M4(3). These units are split proportionally by tenure and size across the scheme to comply with Richmond Council policy. Detailed layouts for the M4(3) units are included as part of the submitted drawings and will ensure that the scheme delivers accessible homes of an acceptable standard in accordance with London Plan and Local Plan policy. A s106 obligation is recommended that will ensure that the units meet the relevant Building Regulations requirement in consultation with the Council's occupational therapist. Through this condition, the London Affordable Rent units would meet the M4(3)(2)(b) accessible standard, which is strongly supported.

264 Richmond Council expressed concern that the proposal does not offer an even mix of 1-, 2-, and 3-bed wheelchair units, and that there is an overabundance of 2- and 3-bed wheelchair units in the affordable rent provision. The applicant has confirmed that although the Registered Provider has not identified issues with the delivery of these units and there is some flexibility to adjust the mix of wheelchair units further as necessary at the detailed design stage. The Registered Provider requested that the wheelchair units be within the affordable rent tenure where the larger 2 and 3-bed homes are also located. On the basis that this is secured within the s106 agreement, GLA officers raise no concern.

## Public realm

265 The submitted drawings and landscape drawings demonstrate that appropriate levels and gradients can be provided across the site to ensure an inclusive environment throughout. The wider public realm has been designed to be inclusive to all users, including adequate illumination and tactile and visual aids for navigation. Additionally, level access would be provided to all commercial uses.

## Car parking

266 The overall development is car-free apart from 14 Blue Badge accessible parking spaces, equating to 3% of the total units, distributed across the scheme adjacent to building entrances. The car parking management plan, secured through the S106 agreement, will set out measures to monitor and increase this provision up to 10% in compliance with Intend to Publish London Plan Policy T6.1. This will be secured within the S106 agreement.

## Inclusive design conclusion

267 The application would achieve a high level of accessible and inclusive design and would comply with London Plan Policies 3.8, 6.13, 7.1, 7.2, 7.5 7.6, Intend to Publish London Plan Policies D3, D7, and T6.1, the Accessible London SPG and Richmond Local Plan Policies LP35 and LP30.

## **Impacts on Neighbouring Amenity**

268 London Plan Policy 7.6 states that the design of new buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings in relation to privacy, overshadowing, wind and microclimate. This is

particularly relevant where tall and large-scale buildings are proposed. Intend to Publish London Plan Policy D6 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context. London Plan Policy 7.15 and Policy D13 of the Intend to Publish London Plan state that development should manage noise to improve health and quality of life.

269 Richmond Council's Local Plan Policy LP 8 (amenity and living conditions) seeks all development to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties from unacceptable increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours, vibration, local micro-climatic effects, daylight and sunlight, and visual intrusion or overbearing impact as a result of the height, massing or siting, including sense of enclosure.

270 Richmond Council's Local Planning Policy LP 10 (Local Environmental Impacts, Pollution and Land Contamination) seeks to ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land as a result of air pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle as well as land contamination.

271 The site is adjacent to a Sainsburys supermarket, two-storey residential properties along Manor Road and residential properties comprising Calvert Court, Robinson Court and No. 2 -24 Manor Park Road to the south. Adjoining the site to the west are a mix of commercial and residential land uses along Dee Road, Victoria Villas and Bardolph Road.

272 The surrounding residential properties to the south and east of the site are mainly two to three storey pre-war housing. To the west the more recently built or converted (via permitted development as in the case of No. 1-5 Dee Road, Clivedon House, Elephant House, 2-6 Bardolph Road and Falstaff House) residential buildings are of a larger scale up to six storeys. This is a large site with the majority of the site given over to car parking and containing buildings that are relatively low rise. As such the site is considered to have the capacity to take on its own character, enabling a scale and massing more significant to the sites potential and local context. With any redevelopment of the site there is likely to be a greater perceived impact on neighbouring properties given the lack of development on the site as existing. As such, any impact on adjacent residential amenity arising from the proposal should be considered in this context. The impact from the proposal on nearby residential occupiers is discussed further below.

### Daylight, Sunlight, and Overshadowing Assessment

273 Following revisions to the scheme in July 2020, the applicant submitted a full daylight, sunlight and overshadowing assessment which considers the impact of the proposal upon existing nearby properties. GLA officers commissioned an independent daylight, sunlight and overshadowing analysis from TFT consultancy to review the findings of that report. That independent review forms the basis for this assessment undertaking in this section of the report.

274 The analysis in the report is based on Building Research Establishment (BRE) Guidelines with specific reference to Vertical Sky Component (VSC), No Sky Line (NSL) and Average Daylight Factor (ADF) for assessing daylight and Annual Probable Sunlight

Hours (APSH) for assessing sunlight. Both the VSC and NSL assessment methods have been used to evaluate the effect the proposed development may have on the neighbouring residential properties.

275 When considering the BRE guidelines it is important to note that paragraph 123 of the NPPF states that local authorities should take a flexible approach to policies and guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site. The Mayor's Housing SPG also states that the BRE guidelines should be applied sensitively taking into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.

276 Vertical Sky Component (VSC): This method of assessment quantifies the amount of skylight available at a reference point on a window, taken at the mid-point of a window. That area of visible sky is expressed as a percentage of an unobstructed hemisphere of sky and therefore represents the amount of daylight available for that particular window. The maximum potential VSC if unobstructed is marginally under 40%. The BRE suggests that if the VSC is less than 27%, and is less than 0.8 times its former value, then the neighbouring buildings will experience a noticeable reduction in the amount of skylight they receive.

277 No Sky Line (NSL): The NSL calculates the daylight distribution within a room by plotting points on working plane which can or cannot see visible sky. Following construction of a new development, a room is likely to experience a noticeable reduction if a significant area of the room is beyond the NSL or is less than 0.8 times its former value. It should be noted that consideration will need to be given to the depths of single aspect rooms. If the room is greater than 5 metres deep, then an adverse infringement may be unavoidable.

278 Average Daylight Factor (ADF): The ADF measures the overall amount of daylight in a space. The calculation considers the VSC value, the size and number of windows serving the space, the overall size of the room and its intended use to give an overall percentage value. BS 8206-2 *Code of practice for daylighting* recommends ADF values of 2% in kitchens, 1.5% in living rooms and 1% in bedrooms. It is common for this method to be used to show that neighbouring properties will maintain sufficient levels of light in the proposed condition.

279 Average Probable Sunlight Hours (APSH): When considering the impact on the amount of sunlight to neighbouring buildings, the BRE report recommends that all main living rooms should be considered if they have a window facing within 90° of due south. Direct sunlight to kitchens and bedrooms is considered less important. To calculate this the BRE has produced sunlight templates for London establishing the Annual Probable Sunlight Hours (APSH) unobstructed light. Following the construction of a new development, a living room window facing within 90° due south will experience a noticeable reduction in direct sunlight if it receives less than 20% of APSH, including less than 5% of APSH during the winter months (between 21 September and 21 March), and receives less than 0.8 times its former sunlight hours during either period, and for existing buildings has a reduction in sunlight received over the whole year greater than 4% of APSH.

280 To confirm, the BRE Guidance is intended for building designers, developers, consultants and local planning authorities. The advice it gives is not mandatory and



should not be used as an instrument of planning policy. As the Guidance states: *“This guide is a comprehensive revision of the 1991 edition of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice. It is purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location.”* It should also be noted that the Guidance is based on a suburban model, and in urban areas such as this one, VSC values of less than 27% would be considered to maintain reasonable daylight conditions.

281 Having regard to the flexible approach outlined in the NPPF and the Mayor’s Housing SPG the following target values have been used to assess the daylight and sunlight implications of the proposed scheme. These targets are considered to be reasonable standards for the redevelopment of sites in urban locations.

- VSC: 15% VSC or within 20% of the existing baseline condition;
- NSL: 50% of the room area or within 20% of the existing baseline condition; and
- APSH: 15% annually and no target for the winter months.

282 Given the proposal’s location and surroundings, the following properties were considered to include a residential component that may be affected by implementation of the proposed scheme:

- 36-58 St Georges Road
- Falstaff House
- St George’s House
- 5-11 Manor Grove
- 80 Manor Road
- 2-8 Manor Park
- 10-16 Manor Park
- 18-24 Manor Park
- 1-21 Manor Park
- 1-53 Calvert Court
- 1-39 Robinson Court
- 50-52 St. Mary’s Grove
- Clarence Court
- 1-4 Manor Grove
- 1-5 Marylebone Gardens
- 69A-81 Manor Road
- 33-39 Crown Terrace
- 1-8 Victoria Villas
- 19-22 Victoria Villas
- 2-6 Bardolph Road
- 13-15 Trinity Cottages
- 12-24 Trinity Road
- 7-15 Trinity Road
- 3-11 St Georges Road

283 Based on the findings documented in the report, the following properties have the potential to experience a noticeable reduction in light as a result of the scheme proposals. Those results are discussed in more detail in the subsequent paragraphs.

284 Falstaff House and St Georges House: These properties currently overlook a vacant part of the site and have recessed balconies, which obstruct windows’ ability to view the sky over neighbouring buildings. All but six of the windows considered will remain with a VSC above 15%, which is considered adequate. NSL results indicate that these properties would remain with good levels of daylight, generally complying with BRE guidelines. The APSH indicate that some rooms will fail to maintain adequate levels of sunlight; however, overall these properties will remain within acceptable limits.

The proposed massing results in a lesser daylight/sunlight impact than previous versions of the scheme.

285 1-8 Victoria Villas: While 22 windows would not meet BRE target values, all windows would either remain within 20% of the existing baseline condition or have a VSC of at least 15% in the proposed condition. NSL results indicate that all rooms would remain with at least 60% NSL coverage, which is considered good. APSH results indicate that this property would fully meet BRE target values.

286 19-22 Victoria Villas: These properties are located west of the proposal site immediately adjacent to the railway line. The VSC results for these properties indicate that all-but-nine of the windows would comply with BRE target values and all-but-three would achieve the VSC of at least 15%; however, two windows would have the potential to experience a reduction greater than 40%. NSL results indicate that all rooms would remain with at least 57% NSL coverage, which is considered good and the APSH results indicate that the property would still enjoy sufficient levels of sunlight.

287 2-6 Bardolph Road: This three-storey property is located west of the site, across the railway line, and currently benefits from very good VSC levels over the site. VSC results indicate that although several windows would experience a major loss of light (in excess of 40%), they would all retain VSC levels over 15%. Similarly, all rooms would experience a major reduction in sky visibility; however, all rooms would remain with at least 50% NSL coverage. APSH results indicate that this property would fully comply with BRE target values.

288 Council expressed concerns that further homes on Trinity and St Georges Roads would experience a loss in daylight/sunlight as a result of the proposed development and that the effect of the proposals on these properties has not been adequately considered. Further independent review indicates that these properties would still benefit from adequate daylight/sunlight levels in line with BRE guidelines.

289 The overshadowing assessment indicates that the proposed scheme would not cause excessive overshadowing to the neighbouring residential areas and therefore will generally comply with the BRE target values.

290 In summary, Falstaff House, St Georges House, 1-8 Victoria Villas, 19-22 Victoria Villas, and 2-6 Bardolph Road would experience a noticeable reduction in light as a result of the proposed development. These properties currently benefit from very good levels of light owing to the current underutilisation of the site. In this situation, a reduction in light from the optimisation of the site would be unavoidable. Nevertheless, these properties would all achieve acceptable light levels whether considered against an urban or suburban context. Additionally, the overshadowing assessment indicates that the proposed scheme will not cause excessive overshadowing to the neighbouring residential areas and therefore will generally comply with the BRE target values.

291 Considering the absence of massing on the site currently, any development of scale would necessarily result in adverse daylight/sunlight impacts. Taking this into account, GLA officers acknowledge the need to adopt a flexible approach as outlined in the NPPF and Mayor's Housing SPG. In this respect, although the proposed development would result in a noticeable reduction in light in some nearby properties, the residual light levels are all within acceptable limits and the reduction is considered an unavoidable outcome from optimisation of the site's capacity. GLA officers do not agree that daylight,

sunlight, and overshadowing impacts are severe enough to warrant refusal of the scheme, as stated in Reason for Refusal 3. The daylight, sunlight, and overshadowing impacts of the proposed development are therefore considered acceptable and the application is considered to accord with the NPPF, London Plan Policy 7.6, and Richmond Local Plan Policy LP8.

### Noise and Vibration

292 Specialist acoustic modelling was used to predict sound levels incident on the proposed buildings and across the proposed site as well as to assess the impact of the proposed buildings on the neighbouring properties.

293 In its existing condition the site and surrounding area are already exposed to high levels of environmental sound, primarily governed by road and railway traffic activity. Modelling was undertaken to understand the impact of the proposed development on surrounding residential properties and in particular to address concerns raised about impact on Manor Park properties south of the site. As can be seen in Figure 11 below, the modelling undertaken indicates with the proposed buildings in place the noise levels incident on the properties on Manor Park will remain the same as existing or improve slightly. This is due to the fact that the facades of the proposed buildings are actually set back further from the railway line than the existing Homebase building.

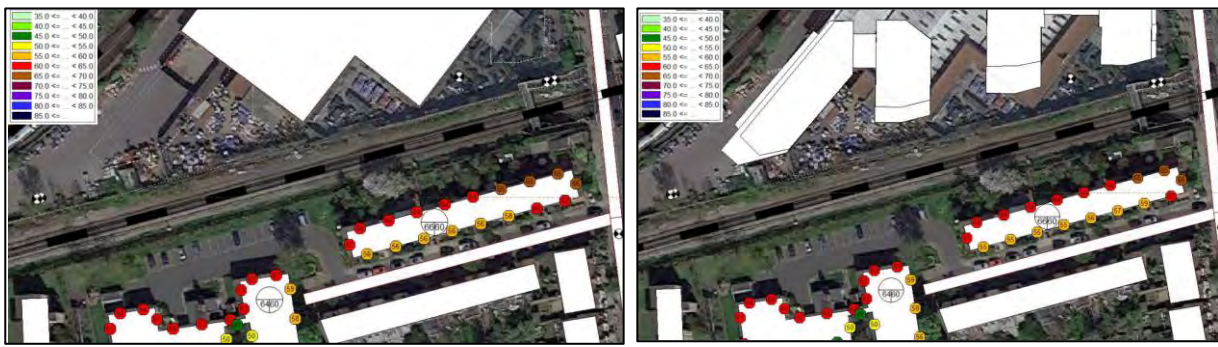


Figure 11 - Noise impact on Manor Grove properties, existing (left) and proposed (right)

294 Based on the information provided in the Noise and Vibration Impact Assessment it is considered that the proposed development will not result in any adverse impact on neighbouring properties by way of noise or vibration and may in fact improve upon existing conditions.

### Outlook and Sense of Enclosure

295 The Council's reason for refusal cites undue harm to the amenity of neighbouring properties, including a loss of outlook and a sense of enclosure. While it is considered that the proposal would affect the outlook of several existing residential properties in the local area and reduce the openness of the site, the current outlook and sense of openness are both products of the underutilisation of the site. This underutilisation runs contrary to national planning policy.

296 A 20-metre separation distance is proposed between the homes on Manor Road and the new development, which steps down to an appropriate four stories along this edge. All other separation distances from existing development are over 20-metres, as



set out in more detail in the privacy section below. The proposal, therefore, is not considered to cause an adverse sense of enclosure for neighbouring properties.

297 Whilst the proposal would represent a change in outlook and a greater sense of enclosure for some properties, it is considered that this impact is acceptable noting that this is a well-designed scheme within a mixed urban and suburban context which provides much needed affordable housing. The site is also of adequate size to inform its own character internally. For these reasons, GLA officers conclude that the proposal would not have an unacceptable impact on outlook and would not cause an adverse sense of enclosure for neighbouring properties.

### Privacy

298 Richmond Council's Local Plan Policy LP 8 specifies within the explanatory text that the minimum distance guideline of 20 metres between habitable rooms within residential developments is required for privacy reasons. The Mayor's Housing SPG (March 2016) notes that minimum separation distances of 18-21 metres between habitable rooms are commonly used yardsticks but advocates a more flexible approach to managing privacy.

299 The proposal provides a minimum separation distance between the balconies and windows of the proposed development and any existing neighbouring properties. There is a 34.8 metre separation distance between the proposed development and the nearest properties to the south, with the interceding railway line acting as an additional buffer. Similarly, there is a 36.6 metre separation distance between the proposed development and properties to the south east of the site. In the central and northern parts of the site, the development is separated from existing properties by 22 and 22.5 metres, respectively.

300 In summary, the separation distances provided between windows and balconies of the proposed development and the neighbouring properties are considered sufficient to ensure that no significant harm would arise to the amenity of neighbouring occupiers.

### Neighbouring amenity impacts conclusion

301 It is concluded that, on balance, the proposal would have an acceptable impact on neighbourhood amenity. Whilst the proposal would impact the daylight/sunlight received by some neighbouring properties, this impact is considered inevitable given that the adjacent neighbours currently borrow amenity from the application site by benefitting from its current underdevelopment. As the impacted light levels in neighbouring properties would still be within acceptable ranges, the proposal is considered acceptable, on balance, in terms of daylight/sunlight. The proposed development would also not cause unacceptable loss of privacy due to the separation distances between the proposed buildings and neighbouring residential properties and there would be no adverse impact in terms of noise and vibration. The proposal would also not result in an unacceptable impact on outlook and would not result in an adverse sense of enclosure. For these reasons, the impact of the proposals on the residential amenity of existing residents close to the site would be acceptable, and the proposals therefore comply with London Plan, Intend to Publish London Plan and Richmond Local Plan Policies.

## **Design Conclusion**

302 The Council resolved to refuse the application on the grounds of its siting, layout, height, scale, bulk, design and materials being considered to represent a visually intrusive, dominant and overwhelming form of overdevelopment to the detriment of the character of the site and surrounding area representing a visually intrusive and overbearing form of overdevelopment; to the detriment of the surrounding occupant's current level of amenities, in particular those residing at Manor Park; Bardolph Road and Cliveden House.

303 It is the view of GLA officers that the proposed massing and height has been carefully considered by the applicant and is appropriate for this site, responding well to the local townscape and context. The development optimises the potential for a generous and enhanced public realm whilst providing increased surveillance, permeability and active frontages in line with SPD guidance.

304 The excellent design of the proposed buildings will promote an enhanced built and public environment and, whilst they are classed as tall buildings for the purposes of Richmond Local Plan Policy LP2, they make a positive contribution to the existing townscape, character and local distinctiveness of the area in accordance with Policy 7.7 of the London Plan. The quality of the design, architecture and materials will ensure a distinctive and high-quality development which will contribute positively to this part of Richmond. The development will thus comply overall with the relevant development plan policies set out above and be consistent with the Intend to Publish London Plan.

## **Climate Change**

305 London Plan Policy 5.2 and Policy SI 2 of the Intend to Publish London Plan, require development proposals to minimise carbon dioxide (CO<sub>2</sub>) emissions to meet the Mayor's targets, in accordance with the following energy hierarchy:

- Be lean: use less energy
- Be clean: supply energy efficiently
- Be green: use renewable energy

306 Richmond Council's Local Plan Policies LP 20 and LP 22 set out the borough's approach to climate change and requires developments to meet the highest standards of sustainable design, including sustainable drainage and the conservation of energy and water, with residential development of 10 units or more development achieving zero carbon standards.

## **Energy**

### Energy strategy

307 The applicant has submitted an energy strategy for the site. This sets out measures to reduce carbon dioxide emissions beyond the 2013 Building Regulations of 35% for the residential element of the development and 35% for the non-residential element of the development, in compliance with the London Plan target. In reporting the application at Stage 1, it was observed that the scheme broadly followed the London Plan energy hierarchy, but was not fully compliant and there remained outstanding issues that

required resolution before it could be confirmed that the scheme was fully in accordance with the London Plan and since that time further discussion has taken place to resolve outstanding matters and ensure full compliance, principally in relation to further passive measures for domestic overheating, the domestic cooling proposed, implementing a site-wide energy system as opposed to by block and further information on PV and heat pumps required; at the time domestic emissions are slightly below the 35% target but were revisited.

308 Energy efficiency (Be Lean): A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Measures include the use of Air Source Heat Pumps (ASHP), low volume water fixtures and fittings, space cooling, high efficiency lighting, high efficiency ventilation and insulated pipework. The applicant is now reporting a 10.2% saving in regulated carbon dioxide emissions from energy efficiency measures alone compared to a 2013 Building Regulations compliant development with the ASHP anticipated to provide an additional 34.9% reduction in emissions. Overall, the anticipated reduction in regulated carbon dioxide emissions is anticipated to be 45.7%.

309 District heating (Be Clean): The applicant is proposing to install a block by block approach as there is no centralised location with sufficient space to accommodate the required heat pumps. Distribution losses are likely to be 18% in a site-wide network, but just 7% with a block-by-block approach and this difference equates to 25 Tonnes CO<sub>2</sub> / annum. Installing pipework now will result in additional embodied carbon and the pipes will deteriorate. In order to future proof the proposals, space allowance has been made for heat interface units to the ground floor of each building with trenching provided between buildings with space allocated for district energy pipework, should a district heating system become available in future. The block by block approach is acceptable in this instance. This approach would enable future connection to an area wide district heating network and the applicant will be required to continue to prioritise connection through a Section 106 obligation.

310 Renewable technology (Be Green): The applicant has investigated the feasibility of a range of renewable energy technologies. The development would use ASHPs. The applicant has also identified photovoltaics (PV) as the most suitable renewable technology, to be located on all higher-level roof spaces where there is space and not outweighed by overshadowing, plant space requirements or access. At this stage, officers consider the level of PVs to be appropriate but to ensure these are maximised, a condition is recommended requiring submission, prior to occupation, detailed roof layouts for all blocks demonstrating that the potential for PV has been maximised

311 Overall savings: Based on the energy assessment submitted, a 45.7% reduction in regulated carbon dioxide emissions per year is expected, compared to a 2013 Building Regulations compliant development. This comprises a 100% reduction in the residential element and a 35% reduction for the commercial areas achieved through a combination of passive design, energy efficiency measures, and LZC technologies. The carbon dioxide savings respectively comply with the target set within Policy 5.2 of the London Plan for both elements of the scheme. In order to meet the zero-carbon target for the residential element, a contribution is required to make up for the deficit, which has been estimated at £422,885 and will be paid into Richmond's carbon offset fund, to be secured in the Section 106 Agreement. Should the Intend to Publish London Plan be adopted prior to a decision on this application, the applicant would be required to pay a further £17,000 in order to meet the zero-carbon target for the commercial element of



the scheme. In addition, there would be an increase in the residential element from circa £423k to £670k. As such, should the Intend to Publish London Plan be adopted prior to a decision into this application the total carbon offset payment to be secured in the S106 agreement would rise to £687,000. A condition is also recommended requiring that the proposal is carried out in accordance with the approved energy strategy.

312 In summary, the development utilises ASHP as the main source of energy and meets policy requirements in respect of Be Lean Be Clean and Be Green. Whilst a site wide network is preferred, given the slim likelihood of a district heat network being implemented in this area in the immediate future, and the demonstrated impacts this would have on the emission of CO<sub>2</sub> through loss and embedded carbon, and likely deterioration of the infrastructure, the block by block approach is considered the most appropriate at this time. The development is therefore in accordance with London Plan Policy 5.2, Intend to Publish London Plan Policy SI 2, Richmond Local Plan Policy LP 20 and LP 22, subject to provisions secured as recommended conditions and within the Section 106 Agreement.

### **Flood risk and drainage**

313 Paragraph 163 of the NPPF states that where appropriate, planning applications should be supported by a site-specific flood-risk assessment, which is reflected in London Plan Policy 5.12 and Intend to Publish London Plan Policy SI12. The NPPF also states that major development should incorporate sustainable drainage systems which is reflected in London Plan Policy 5.13 and Intend to Publish London Plan Policy SI13.

314 London Plan Policy 5.12 and Intend to Publish London Plan Policy SI 12 seek to ensure that developments address flood risk through a flood risk assessment and incorporate flood resilient design. London Plan Policy 5.13 and Intend to Publish London Plan Policy SI 13 state that developments should use sustainable drainage systems (SuDS) and should ensure that surface water run-off is managed as close to its source as possible in line with the London Plan drainage hierarchy. SI 13 also states that proposals should aim to achieve greenfield run-off rates.

315 Richmond Local Plan Policy LP 21 requires all developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere, and requires the use of Sustainable Drainage Systems (SuDS) in all development proposals. Local Plan Policy LP 17 instructs that green and/or brown roofs should be incorporated into new developments with roof plate areas of 100 sqm or more where technically feasible and subject to considerations of visual impact.

### **Flood risk**

316 The application site is within Flood Zone 1 and a Flood Risk Assessment (FRA) which assesses any likely significant effects of flooding and drainage was submitted.

317 The FRA assesses the residual risk of flooding due to surface water and groundwater and has taken into consideration Richmond's Strategic Flood Risk Assessment. A full review of flood risk (including residual risks) from all sources of flooding has been provided, and flood resilience and emergency planning measures incorporated to manage these risks. The report recommends a detailed drainage design be produced to secure draining to soakaways and not connect to the surface water

sewers; a surface water drainage strategy using blue and green roofs; and attenuation and infiltration tanks to manage surface water on the site including an allowance for climate change. By implementing these measures, surface water will be managed on site and not increase downstream flood risk. It is recommended that the detailed drainage design is conditioned. As such the proposal therefore complies with London Plan Policy 5.12 and Richmond Local Plan Policy LP 21, along with Intend to Publish London Plan Policy SI 12.

### Drainage

318 The surface water drainage strategy provides an assessment of existing runoff rates, greenfield runoff rates, and required attenuation storage for a range of post-development discharge rates. Selected discharge rate is 25.2 l/s (Greenfield for 1 in 100yr + Climate Change). The surface water drainage strategy addresses the Drainage Hierarchy, and notes that rainwater harvesting, blue/green roofs, permeable paving, and underground storage tanks would be possible options, and that infiltration is feasible.

319 The applicant proposes an attenuation tank of appropriate volume, of 1020 metres cubed, to ensure that the specified tank volume will allow discharge rates to be restricted to the desired rate. An assessment of exceedance flow paths has been provided showing that these are available through the site in the case of attenuation system blockage or an extreme rainfall event.

320 The surface water drainage strategy for the proposed development therefore complies with London Plan Policy 5.13, Intend to Publish London Plan Policy SI 13, and Richmond Local Plan Policies LP 17 and LP 21.

### **Sustainability strategy**

321 Although the London Plan and Intend to Publish London Plan have no specific requirements in relation to BREEAM, Richmond Local Plan Policy LP 22 sets out that non-residential buildings over 100 sq.m. will be required to meet the BREEAM “excellent” rating.

322 The applicant has submitted a BREEAM pre-assessment, which is included in the Sustainability Strategy, and construction management plan for the site, which set out several sustainability measures proposed in the design and construction process, as follows:

323 The BREEAM Pre-Assessment (contained within the Sustainability Strategy) which has been undertaken for the commercial space confirms that scheme is seeking to achieve an ‘Excellent’ rating with a baseline score of 74.2%. This approach and the commitment relating to BREEAM is recommended to be secured by way of planning condition, in line with the requirements of Richmond’s Local Plan Policy LP 22.

324 Water use demand: London Plan Policy 5.15 states that development proposals should incorporate water saving measures and equipment and should be designed so that mains water consumption would meet a target of 105 litres per head per day. This target is retained in Intend to Publish London Plan Policy SI5, with the further requirement that commercial development achieves at least the BREEAM “Excellent” standard for water consumption. The sustainability statement proposes that the proposed dwellings will have a maximum indoor water consumption of 105 l/person/day,

in line with the optional standard in Part G of the Building Regulations. The sustainability statement notes that BREEAM 'Very Good' is targeted for the shell of the non-residential component of the development. Water consumption is noted to be excluded as fitout will be done separately, and the maximum number of other available water credits for the shell is achieved. The proposed development therefore meets the requirements of London Plan Policy 5.15 and Intend to Publish London Plan policy SI 5.

325 Materials and construction waste recycling: The BREEAM pre-assessment sets out commitments by the applicant to specify products with an environmental product declaration and to use FSC certified timber for construction through a sustainable procurement plan. A site waste management plan would be implemented, with targets to be agreed for recycling waste and reduced waste to landfill. The commitments within the site waste management plan would be secured by condition.

### **Climate Change Conclusion**

326 The proposed development would minimise carbon dioxide emissions in line with London Plan and Local Plan policy regarding climate change, with a carbon offset contribution secured in the Section 106 Agreement. The development would not increase flood risk and would deliver sustainable urban drainage benefits over the existing situation at the site. The development has also committed to achieve high standards in sustainable design and construction. In these respects, the development complies with relevant policies regarding sustainability and climate change mitigation.

## **Environment**

### **Trees**

327 London Plan Policy 7.21 requires that wherever possible, existing trees of value are retained and that if permission is granted that necessitates tree removal, adequate replacement is provided based on the existing value of the benefits of the trees removed. The thrust of this is reflected in Richmond Council's Local Plan Policy LP 16 and Intend to Publish London Plan Policy G7.

328 There are 64 existing trees on site which are covered by an area Tree Preservation Order (TPO). The majority (nearly 80%) of the existing trees are low quality, Category C, planted when the site was developed for retail use. A small number are moderate Category B owing to their size and health. There are no Category A high quality trees. 42 trees are proposed for removal, of which 39 are within the Area TPO.

329 An Arboricultural Appraisal and Implications Assessment has been prepared which concludes that that whilst the proposal requires the removal of protected trees, these trees are of moderate to poor quality, with little prospect of ever making a significant contribution to the local landscape.

330 The Amended Proposed Development includes the installation of 141 new trees, which is an increase in 77 trees from the existing position. Additionally, this is a further improvement upon the Original Proposed Development which included 113 replacement trees.

331 Along with the Arboricultural Appraisal and Implications Assessment, a Landscape Design and Access Addendum has been submitted as a separate document, where the



previous landscape strategy was set out in the main Design and Access Statement, in support of the revised planning application.

332 On the basis of the quality of the existing trees within the TPO area, the proposed increase in trees as part of the proposals, and the additional landscaping that will be secured by s106, the proposals are compliant with London Plan Policy 7.21, Intend to Publish London Plan Policy G7 and Richmond Local Plan Policy LP 16. In addition, it is noted that Richmond Council did not object to the proposal on this basis.

## **Biodiversity**

333 Paragraphs 170 and 175 of the NPPF state that planning decisions should contribute to enhancing the natural environment by minimising biodiversity impacts and avoiding or mitigating harm and providing net gains. Paragraph 177 states that the presumption in favour of sustainable development does not apply where the proposal is likely to have a significant effect on a habitats site (either alone or in combination with other proposals), unless an appropriate assessment has concluded that the proposal will not adversely affect the integrity of the habitats site.

334 London Plan Policy 7.19 promotes the protection and enhancement of biodiversity, including green corridors and states that new development should realise the opportunities for positive biodiversity gains. Intend to Publish London Plan Policy G6 further states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Richmond's Local Plan Policy LP 15 (biodiversity) seeks to ensure all developments provide net gains for biodiversity.

335 The site does not fall within the boundaries of any statutory or non-statutory sites of nature conservation and is not designated for any nature conservation purposes. A Preliminary Ecological Assessment (PEA) has been carried out by the applicant which identifies opportunities to enhance the biodiversity on site and recognises the majority of habitats within the site that may be lost as a result of a development are of negligible ecological importance and no specific mitigation is required.

336 The PEA incorporates a bat survey which finds that the buildings and trees within the site have negligible potential to support roosting bats but nevertheless recommends including bat boxes within the scheme and sensitive lighting along the site boundaries to avoid disturbance to commuting bats. The survey also recommends that if demolition or vegetation clearance is scheduled between March-August, a pre-works check by an Ecological Clerk of Works (ECoW) is undertaken.

337 The loss of the limited existing habitat is unfortunate, but the proposals mitigate this and enhance the existing biodiversity. Conditions are recommended in relation to demolition and vegetation clearance pre-work checks and invasive species removal. The proposed tree planting and landscaping will greatly enhance the ecology of the site attracting a variety of bats, birds and other species. As such the proposal enhances the biodiversity of the site, providing a net gain in line with the NPPF, London Plan Policy 7.19, Intend to Publish London Plan Policy G6 and Richmond Local Plan Policy LP 15.

## Urban Greening

338 London Plan Policy 5.10 and Intend to Publish London Plan Policy G5 state that developments should provide new green infrastructure that contributes to urban greening. Policy G5 also sets out a new Urban Greening Factor (UGF) to assess the quality of urban greening proposed in new developments, with a recommended target score of 0.4 for predominantly residential developments.

339 The applicant has proposed a range of green infrastructure including green roofs, green walls and flower rich perennial planting

340 The applicant has included a calculation of the development's Urban Greening Factor in the Landscape Addendum. The UGF has been calculated to be 0.35 and therefore falls short of the 0.4 target set within Intend to Publish London Plan Policy G5. Given the reasonable overall quality and quantity of green infrastructure proposed; the positive engagement with the Policy; and a clear description of the constraints to further greening; the current score is considered acceptable in this instance. As it is important that the current level of greening is maintained and delivered as a condition requiring a full landscaping and maintenance scheme to be submitted and approved that will secure the proposed urban greening is recommended.

## Air Quality

341 A core priority of the Mayor's London Environment Strategy (2018) is to improve London's air quality and protect public health by reducing exposure to poor air quality, particularly for the most disadvantaged and those in priority locations such as Air Quality Focus Areas, and outlines a range of initiatives which seek to improve the capital's air quality over time, including the Ultra Low Emission Zone (ULEZ). London Plan Policy 7.14 and Policy SI 1 of the Intend to Publish London Plan state that London's air quality should be significantly improved and exposure to poor air quality should be reduced, especially for vulnerable people and makes provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMA)) and be at least "air quality neutral". Policy SI 1 states that development proposals should not create unacceptable risk of high levels of exposure to poor air quality and should ensure design solutions are incorporated to prevent or minimise increased exposure to existing air pollution.

342 Richmond Council's Local Plan Policy LP 10 promotes good air quality design and new technologies and seeks emissions neutral development. requires measures to be taken to improve air quality and ensure major developments are air quality neutral. In areas with poor air quality such as this one, which is within an Air Quality Management Area (AQMA), the Policy requires assessment and mitigation.

343 An Air Quality Assessment has been submitted in support of the application, which looks at the impacts of demolition and construction, and traffic generated by the scheme and includes an Air Quality Neutral Assessment. This confirms that the development will be air quality neutral based on the benchmarking criteria.

344 Construction Phase: The applicant's air quality assessment stated that dust sensitive receptors will potentially experience increased levels of dust and particulate matter before using any mitigation and control measures. However, with the implementation of a series of dust mitigation measures set out in Air Quality and Dust

Management Plans which will be secured by condition, the residual significance of potential air quality impacts during construction is not significant.

345 Operational Phase: The applicant's air quality assessment finds that there will be no exceedances of the relevant air quality objectives on the site and that as a result, no mitigation measures are required. The proposed development will be air quality neutral through the use of electrical plant as opposed to gas fired energy and transport emissions being below the Transport Emissions Benchmark.

346 The development leads to a large reduction in vehicle movements and thus does not lead to adverse impacts on local air quality. The assessment has shown that future occupants of the development will also be exposed to acceptable air quality. The proposed development thus complies with London Plan Policy 7.14 (B) and Intend to Publish London Plan Policy SI 1 (B). An Air Quality and Dust Management Plan (AQDMP), should be included as part of a Construction Environmental Management Plan (CEMP) to be approved prior to the commencement of works and is recommended as a condition.

## **Wind**

347 London Plan Policy 7.7 states that tall buildings should not affect their surroundings adversely in terms of (amongst other things) microclimate and wind turbulence. The Mayor's Sustainable Design and Construction SPG identifies the Lawson Criteria as a means for identifying suitability of wind conditions. Intend to Publish London Plan Policy D8 further states that wind conditions around tall buildings must be carefully considered and not compromise comfort. Richmond Local Plan Policy LP 2 requires tall buildings take account of climatic effects, including diversion of wind speeds.

348 The applicant produced a wind microclimate assessment. The assessment is based on a qualitative desk-based methodology that has tested the wind impacts of the proposal using meteorological data, the Lawson pedestrian comfort criteria and the occurrence of strong winds.

349 The assessment confirms that due to the orientation of the Amended Proposed Development, presence of railway lines and the predicted calm wind conditions in the area the proposed development is not expected to change the wind conditions for existing residential buildings around the site.

350 The proposed massing and orientation are highly beneficial in that they would create acceptable wind conditions at ground level around the site. Additionally, the phased planting programme of semi-mature landscaping would improve the comfort level of amenity and play areas throughout the site. Specific mitigation measures have been incorporated into the proposed design which would improve windiness in various locations. Additional mitigation measures such as 1.5 metre balustrades, porous side screen, and small-scale landscaping would further improve comfort levels during worst season conditions for Block B, C, and D terraces and upper floor balconies. These measures should be developed at the detailed design stage in conjunction with an experienced wind engineer and submitted as part of the discharge of conditions. Overall the proposals demonstrate acceptable wind and microclimate conditions compliant with the London Plan, Intend to Publish London Plan and Richmond Local Plan.



## Waste

351 London Plan Policy 5.17 requires adequate provision for waste and recycling storage and collection facilities as part of new developments. In relation to waste generated through demolition, groundworks and construction, Policy 5.18 requires applicants to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials. Intend to Publish London Plan Policy SI 7 seeks to reduce waste and increase material reuse and recycling and promotes a circular economy. The policy also sets several waste targets including a strategic target of zero biodegradable waste or recyclable waste to landfill by 2026.

352 Richmond Local Plan Policy LP 24 and Refuse and the Recycling Storage Requirements SPD (2015) require waste to be managed in accordance with the waste hierarchy, which is to reduce, reuse or recycle waste as close as possible to where it is produced. The policy also requires the location and design of refuse and recycling facilities should be sensitively integrated into the scheme. All major developments are required to produce Waste Management Plans to arrange for the efficient handling of construction, excavation and demolition waste and materials.

353 The applicant has provided a Circular Economy Statement, which demonstrates how demolition, excavation, and construction materials will be re-used, recovered, and/or recycled; how the proposed design and construction will reduce material usage, minimise waste and embed longevity, flexibility and adaptability; how the construction plan will take advantage of opportunities to prefabricate or assemble items offsite; and how the development has been designed to support a sustainable approach to waste and recycling. The submitted Circular Economy Statement exists alongside an Operational Waste Management Strategy which considers the quantum of waste to be produced and how its flow from generation to collection will be managed, and a Sustainable Procurement Plan which outlines benchmarks to be met by construction partners and within the supply chain. The Waste Management Strategy is assessed below.

354 Construction waste: A Construction and Environment Management Plan (CEMP) has been submitted which sets out the waste mitigation and management setting out that all and waste to be loaded within the site. Planning conditions are recommended to provide a more detailed Construction Environment Management and Logistics Plan prior to commencement and to ensure that contractors adhere to it.

355 Operational waste: The applicant has provided detail about the operational waste strategy for the site in the Waste Management Strategy. This has the following key themes:

- Each residential block would be provided with a dedicated bin store at ground floor accommodating communal bin storage for each waste stream;
- The stores would be located adjacent to cores, so in a convenient location for all residents, and would be of an appropriate size for required the necessary number of bins;
- The facilities management team will be responsible for taking out and returning the bins from eight out of the eleven refuse storage areas to the refuse collection vehicle at the time of collection and facilitating collection to the remaining three,

which are proposed to be directly serviced by refuse vehicles on collection days;  
and

- Adequate provision is made for commercial waste.

356 Richmond Council raised concerns that the service roads proposed along the western part of the site may be inadequate based on the swept path analysis provided. The Council also requested revisions to push bin routes and additional details on bin and bulky waste storage. The applicant has since reviewed the swept path analysis using the most representative vehicle available and determined that the service roads as proposed would be fit for purpose; however, that notwithstanding revisions to kerb lines could be made during the detailed design process. The applicant has also confirmed that the requested revisions to push bin routes would be adopted and that the details requested could be provided at the detailed design stage and form part of the Waste Management Strategy to be secured by condition.

357 GLA officers are satisfied that the proposal accords with London Plan Policies 5.17 and 5.18, and intend to Publish London Plan SI 7, subject to details being secured by appropriate conditions.

### **Contaminated Land**

358 London Plan Policy 5.21 requires the investigation and, where appropriate, remediation of contaminated sites, with appropriate mitigation to ensure contaminated land is brought back into beneficial use and to avoid harm to the environment or human health. Richmond Local Plan Policy LP 10 seeks to ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land.

359 Richmond Council has confirmed that their records indicate that the site and surrounding area has been subject to former potentially contaminative land uses. Geo-Environmental and Geotechnical Preliminary Risk Assessment has been submitted in support of the application. This included a desk-based assessment and on-site survey.

360 Richmond Council's Environmental Health Officer raises no objections. The Environment Agency raise no objections to this application subject to conditions.

361 It is recommended that an intrusive ground investigation is undertaken to further quantify Geo-Environmental and Geotechnical risks associated with the development to be secured by condition and requiring a halt to development on discovery of unexpected contamination is also recommended. This will satisfy the requirements of policy and make that proposals compliant with London Plan Policy 5.21 and Richmond Local Plan Policy LP 10.

### **Transport**

362 Chapter 9 of the NPPF sets out the Government's aim to promote the use of sustainable modes of transport. When considering the transport implications of development proposals, the NPPF states that decision-makers should ensure that site specific opportunities available to promote sustainable transport modes have been taken up; safe and suitable access to site would be achieved for all users; and any significant impacts from development on transport network (in terms of capacity or congestion) or

highways safety can be mitigated to an acceptable degree. Paragraph 109 of the NPPF states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or where residual cumulative impacts on the road network would be severe. Paragraph 110 of the NPPF sets out additional criteria which should be addressed which includes pedestrian, cycle and inclusive access.

363 London Plan Policy 6.1 sets out a strategic approach for transport in London. This includes the aim to encourage patterns of development that reduce the need to travel, especially by car, through the use of maximum car parking standards; seeking to improve the capacity and accessibility of public transport, walking and cycling infrastructure; encouraging shifts to more sustainable modes of travel and promoting walking and safe and step-free access. Intend to Publish London Plan T1 states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated Policy 6.3 states that the impact of development proposals on transport capacity and network should be fully assessed and not adversely affect safety, with schemes appropriately phased where transport capacity is insufficient to allow for the expected trip generation. Other relevant transport policies are Policies 6.9, 6.10, 6.11 and 6.13 which cover cycling, parking and traffic congestion. Policy 8.2 of the London Plan sets out the Mayor's priorities for planning obligations and states public transport improvements should be given the highest importance, alongside affordable housing.

364 The Mayor's Transport Strategy (2018) (MTS) seeks to promote sustainable mode shift, reduce road congestion, improve air quality and assist in the development of attractive, healthy and active places. The MTS aims to ensure that by 2041, 80% of all Londoners' trips will be made on foot, by cycle or by public transport. Policy T1 of the Intend to Publish London Plans requires development proposals to support this overarching aim, as do a range of other policies in the Intend to Publish London Plan on 'Healthy Streets' (Policy T2), cycling (Policy T5), parking (Policy T6, T6.1-T6.5) and funding necessary transport mitigation measures (Policy T9). Policy T4 of the Intend to Publish London Plan requires transport impacts to be assessed and mitigated and avoid road danger.

365 Richmond Council's Local Plan Policy LP 44 states that that the Council will work in partnership to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment. Local Plan Policy LP 45 requires new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment, and ensuring making the best use of land.

366 Issues with respect to transport were considered by the Council as having been satisfactorily addressed, subject to agreement of appropriate planning conditions and section 106 obligations to secure necessary mitigation measures. Transport does not feature in the Council's reason for refusal. The Mayor's Stage 1 comments concluded that some further work on transport was required prior to determination by the council.

367 These matters have been satisfactorily resolved subject to planning conditions and section 106 obligations, and other matters considered as part of the submitted amendments to the scheme as set out below.

### **Trip generation**

368 The applicant has undertaken their trip generation assessment within the Revised Transport Assessment dated July 2020, in accordance with TfL's methodology. This concludes that the proposed development is likely to generate an additional 264 two-way person movements during the weekday morning peak (0800 to 0900), and approximately 204 two-way movements during the evening peak (1700 to 1800) compared with the existing use on site. Given the car-free nature of the proposed development, this would result in a net reduction in peak hour vehicle trips (-17 two-way trips in the AM peak hour and -51 in the PM peak hour) on the surrounding highway network compared to the existing use on site and as such would have a minimal impact on the surrounding highway network. Most additional movements are predicted to be public transport trips followed by walking and cycling trips. This is consistent with the public transport provision nearby.

### **Car parking**

369 The development is car free except for 14 disabled person's car parking spaces which is in accordance with Intend to Publish London Plan standards. The Intend to Publish London Plan requires that disabled person's parking should be provided for 3% of dwellings, at the onset with up to 10% provided should demand arise, as proposed by this development. It is noted that 20% of the proposed disabled person's spaces would include active charging facilities with passive provision for all remaining spaces. A Car Parking Management Plan, detailing how the disabled car parking spaces would be managed and monitored including confirmation that the spaces will be leased and not sold, along with the location of where the remaining 7% (32 spaces) could be provided should demand arise, will be secured through the Section 106 agreement. All parking is located at-grade and accessed via the existing vehicular access.

370 The Council have raised concerns that occupation of the additional disabled persons parking spaces not provided initially could result in the loss of amenity space and short stay cycle spaces. According to the proposal, additional spaces would only be converted should demand exceed initial supply. Currently, 2.8 per cent of Londoners hold a Blue Badge, and whilst this will fluctuate between boroughs, it is unlikely demand will exceed the 3 per cent supply at the onset and if it does, it would only require an incremental increase in line with the increasing demand. As such, the risk of loss to amenity space is considered minimal.

371 Two car club spaces with active charging facilities are also proposed on site and three years free car club membership will be secured through the Section 106 agreement for all new residents. The Council have highlighted that the car club provision proposed does not accord with their Air Quality SPD; however, given the site location it is considered that sustainable transport, which is better for air quality, should be encouraged over car use. Furthermore, the number of spaces proposed is based on viability discussions with a car club operator and are therefore considered to be acceptable. The location of the car club spaces would need to be detailed in the Car Parking Management Plan



372 Concerns have been expressed by several objectors that any demand for car parking from the development cannot be met on local roads as the site is not currently located within a Controlled Parking Zone. Given the sites access to public transport options, the proposed site is considered an appropriate location for a car-lite development. Should there be an increased demand for parking, parking stress surveys have indicated that there is spare capacity on-street throughout the day. That notwithstanding, a £50,000 contribution will be secured through the Section 106 Agreement towards parking monitoring within the vicinity of the site, review and consultation on the introduction of a new Controlled Parking Zone. A further £50,000 contribution will be secured for the implementation of said Controlled Parking Zone.

373 Should a Controlled Parking Zone come forward in the future, the development would be subject to an appropriate legal planning restriction whereby occupiers would be exempt from parking permits. This will be secured within the Section 106 Agreement. The development is, however, considered acceptable regardless of whether a CPZ were to come forward in the future. As such, this clause within the Section 106 Agreement has been given no weight in the planning balance but is a welcome offer from the applicant.

374 The car parking provision accords with London Plan Policy 6.13 and Richmond Local Plan Policy LP 44 and LP45. It also accords with Policies T6, T6.1, T6.3 and T6.5 of the Intend to Publish London Plan.

## **Healthy Streets**

375 The proposed development would see an increase in pedestrian and cycle trips to and from the site and the local area. Public realm improvements are proposed along the entire site boundary along Manor Road. The layout of the development would provide a significant amount of new public realm and allow pedestrian and cyclist permeability into the site; however, opportunities for through-site permeability are limited by the hard boundaries of the railway lines running north south and east west. Nevertheless, the proposals would add much needed public realm to the locality and offer a good improvement overall for pedestrians, within these parameters. In order to maintain pedestrian and highway safety at the existing pedestrian refuge crossing point to the south of the development site on Manor Road, it is recommended that the existing dropped kerbs on the eastern and western footways of Manor Road be improved to include tactile paving, and that tactile paving also be included on the refuge itself. This can be delivered through a Section 278 agreement which should be secured within the Section 106 agreement. These improvements would contribute to the Mayor's "Healthy Streets" agenda for encouraging active travel and mode shift away from private vehicles. All proposed pedestrian improvements will be secured within the Section 106 Agreement; therefore, GLA officers consider that the application complies with London Plan Policies 6.9 and 6.10 and Policies T2 and T4 of the Intend to Publish London Plan.

376 A significant proportion of the pedestrian and cycle movements generated by the development are expected to use Manor Circus. TfL's Manor Circus improvements scheme will provide residents improved pedestrian and cycle safety at this junction and better links to the cycle networks. TfL previously requested a contribution representing 15% of the estimated Final Scheme Costs. This figure has now been revised due to additional design costs. A revised financial contribution of £380,000 towards the implementation of the Manor Circus scheme will be secured in the Section 106 agreement.

## **Cycling**

377 The applicant is proposing a total of 817 residential cycle parking spaces on site, including 12 short-stay spaces. This quantum slightly exceeds the London Plan Policy 6.9 and Intend to Publish London Plan T5 standards. The applicant is also proposing 7 long-stay and 25 short-stay spaces for the commercial element. All cycle parking is in accordance with the Intend to Publish London Plan standards. Most of the long-stay parking is located within each of the residential blocks to allow residents convenient access. Short-stay parking is located within the public realm close to building entrances. A condition requiring details of the type (at least 5% should be Sheffield stands at wider spacing for larger/wider cycles), location, and number of cycle parking spaces and the provision of shower and locker facilities for the non-residential elements is recommended along with a requirement to ensure that all cycle parking is designed and laid out in accordance with the guidance contained in Chapter 8 of the London Cycling Design Standards (LCDS).

## **Public transport**

378 There are ten bus routes within walking distance of the site: 65, 371, 493, 190, 419, H37, R68, R70, 391 and H22. Due to the distance to the closest Underground station, all underground trips have been combined with bus trips to ensure a robust assessment of the potential impacts on the bus network. Therefore, the proposed development would generate 116 two-way bus trips in the morning peak hour and a further 90 two-way trips in the evening peak hour. Whilst the uplift is significant, there are currently over 30 buses per hour operating between Manor Circus and Richmond which would likely be the most popular direction of flow. There is also spare capacity in the area for against-flow trips away from Richmond. On that basis, TfL have assessed the uplift in demand based on current capacity and conclude that it can be accommodated within the existing bus network capacity. Therefore, mitigation for bus service improvements has not been sought for this development.

379 North Sheen Station and the trains which serve it are operated by South Western Railway (SWT). During the peak hours there are a total of 8 trains per hour to London Waterloo. The development would generate 72 two-way rail trips in the AM peak hour and 55 in the PM peak hour. Recent rail improvements, including new trains, have increased the capacity of North Sheen-served routes by approximately 16%. In addition, Network Rail have recently realigned platforms at Waterloo, including bringing the old international platforms into use, enabling all 24 platforms to be used by SWT services which allows for increased service and reliability.

380 Given the range of public transport options in the area and having regard to the predicted demand from the proposed development, TfL would not expect the proposed development to have a site-specific effect on public transport capacity that would require mitigation; however, in order to mitigate the impacts of the proposed development on the safe and efficient operation of North Sheen Station and the level crossing the following contributions will be secured through the Section 106 Agreement.

381 Due to the increase in rail passengers using North Sheen Station, as a result of the proposed development, improvements to the station are required to enable the additional passengers to be accommodated without creating a safety or operational performance impact on train services. A contribution of £40,000 towards North Sheen Station improvements will be secured in the Section 106 Agreement.

382 The position of the level crossing presents a risk to future occupiers of the development who may not be familiar with the risks associated with using a level crossing. Furthermore, the proposed development will increase the numbers of people using the level crossing, including school children and cyclists. A contribution of £15,000 would contribute towards community education on railway safety.

383 The proposed development would impact the safety of the level crossing and therefore requires physical mitigation measures. A contribution of £60,000 would deliver safety improvements to the level crossing and associated road layout.

384 A contribution of £30,000 would fund a feasibility study to look at accessibility improvements to North Sheen Station.

### **North Sheen Bus Terminus**

385 Vehicle access to TfL's existing bus terminus would be maintained at all times. The bus terminus would remain operational for TfL throughout the construction of the development. The Section 106 Agreement will secure the requirement that a new bus layover lease be in place prior to commencement, which would allow the continued operation of the bus terminus by TfL.

### **Delivery, servicing, construction and travel planning**

386 A Servicing and Delivery Management Plan has been submitted in support of the application. Loading and deliveries for the residents would be centred at the Block B concierge which would then allow for centralised collection or managed distribution throughout the Site. Designated stopping points have been identified for emergency vehicles which will enable fire or ambulance vehicles and personnel. Network Rail has existing rights of access along the existing service road in order to gain access to their equipment. The design of the proposed development would ensure that this right of way is not impeded.

387 Both the Council and TfL agree that the proposed deliveries and servicing arrangement are acceptable and accord with London Plan Policies 6.3, 6.13D, 6.14 and 2.15C and Intend to Publish London Plan Policy T7. The proposals are also in accordance with Richmond Local Plan Policy LP 45. Furthermore, a detailed Delivery and Servicing Management Plan (DSP) is recommended to be secured by condition and should detail how delivery and servicing movements will be controlled, managed and adhered to by all occupiers. The DSP and Waste Management Plan, also to be secured by condition, should reflect comments raised by the Council in their letter response to the revised application consultation dated 03 September 2020 (para 7.3-7.6).

388 London Plan Policy 6.14B and Intend to Publish London Plan Policy T7 promote the provision of Construction Logistics Plans (CLP) and membership of the TfL Fleet Operators Recognition Scheme (FORS), to minimise the impact and safety risks of construction activities on people and the transport network. A Draft Construction Environment Management and Logistics Plan has been submitted with the application and a detailed version will be secured by pre-commencement condition.

389 Draft Residential and Commercial Travel Plans have been submitted and will be used as the basis for full Travel Plans to be prepared for the development prior to

occupation. Submission and approve of the detailed final versions will be secured, monitored, reviewed and enforced through the Section 106 agreement.

## **Transport Conclusion**

390 The proposals would make acceptable alterations to the public realm in order to accommodate the expected pedestrian demand encouraging sustainable travel. The proposed parking provision is considered acceptable in this urban location and the proposal would not result in any highway or pedestrian safety concerns subject to conditions and the completion of a Section 106 Agreement.

391 Subject to a suitable framework of controls and mitigation as identified above being secured through the Section 106 Agreement and use of appropriate planning conditions, the transport impacts of this development are in accordance with strategic and local transport policies in the London Plan (Policies 6.1, 6.3, 6.5, 6.9, 6.10, 6.12, 6.13, 6.14, 8.2 and 8.3 and Richmond Local Plan Policy LP 44 and LP 45. On the same basis, the development accords with Intend to Publish London Plan (Policies T1, T2, T4, T5, T6, T6.1, T6.2, T6.3, T6.5 and T7).

## **Mitigating the impact of development through planning obligations**

392 Regulation 122 of the Community Infrastructure Levy Regulations 2010 states that a section 106 planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. These are statutory tests.

393 The NPPF states that “Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.”

394 At the regional level, London Plan Policy 8.2 sets out the Mayor’s priorities for planning obligations, and states that affordable housing; supporting the funding of Crossrail where this is appropriate; and other public transport improvements should be given the highest importance. The Mayor’s Intend to Publish London Plan at Policy DF1 identifies that priority should firstly be given to affordable housing and necessary public transport improvements; and following this recognise the role large sites can play in delivering necessary health and education infrastructure; and the importance of affordable workspace, and culture and leisure facilities in delivering good growth.

395 At the local level Richmond Council’s Planning Obligations SPD (2014) provides the basis for determining planning obligations when considering planning applications for development in the borough.

396 GLA officers note that the Council as part of its draft decision notice included a reason for refusal stating that in the absence of a legal agreement securing affordable housing, viability reviews, play space provision and maintenance contribution, carbon offset contribution, local employment scheme, controlled parking zone, railway safety contribution, Manor Circus road safety contribution, Manor Road improvements, car club provision, and travel plan the proposal represented an unacceptable form of overdevelopment. Pursuant to the consideration within the previous sections of this



report, and in line with the policy context set out above, GLA officers propose to secure planning obligations to appropriately mitigate the impact of this development, which are set out below.

### Health and Education

397 London Plan Policy 3.16 and Intend to Publish London Plan Policy S1 support the provision of adequate social infrastructure as part of new developments and state that facilities should be accessible by walking, cycling and public transport. Several objections were made on the issue of capacity of local social infrastructure as part of the public consultation on the initial application and subsequent revisions. Contributions towards education, health, libraries and community facilities are now covered by the Richmond Community Infrastructure Levy. Additionally, a dedicated contribution towards healthcare provision in the local area will be secured in the Section 106 Agreement. Subject to the levy and healthcare contribution being secured, the proposals would not have an adverse impact on local infrastructure including school and healthcare facilities. The application is considered acceptable in terms of its impact on social infrastructure.

### Affordable Housing

398 As discussed in the housing section of this report, the Section 106 Agreement would secure a 40% affordable housing provision (calculated by habitable room), with Fast Track compliant tenure mix and appropriate obligations in relation to the definition, eligibility, affordability and perpetuity of affordable housing units across the various tenures. An early stage review mechanism will be set out in the Section 106 Agreement to incentivise the delivery of the scheme and ensure the appropriately timed delivery of affordable housing. GLA officers consider that these obligations are necessary to ensure compliance with the development plan.

### Transport

399 The following transport obligations will be secured by legal agreement:

- A contribution of £50,000 towards monitoring of parking in the vicinity of the site, plus review and consultation on the introduction of a Controlled Parking Zone;
- A contribution of £50,000 towards implementation of a Controlled Parking Zone;
- A contribution of £380,000 towards implementation of the Manor Circus scheme;
- A contribution of £40,000 towards North Sheen Station improvements;
- A contribution of £15,000 towards community education and railway safety;
- A contribution of £60,000 towards delivery of safety improvements to the level crossing and associated road layout;
- A contribution of £30,000 towards a feasibility study to look at accessibility improvements to North Sheen Station; and
- Provision of two Car Club bays with a free three-year membership.

- Requirement to secure a lease ensuring the continued operation of the bus layover facility prior to commencement.

### Other Obligations

- Carbon off-set payment of £422,885 (or £687,000 in the event that the Intend to Publish London Plan is adopted prior to determination of this application) in to ensure compliance with the zero-carbon standard set out in the London Plan, the Mayor's Intend to Publish London Plan and GLA energy assessment guidance;
- A contribution towards employment and skills training in line with the Council's Planning Obligations SPD; and
- A Section 106 monitoring fee, dispute resolution provisions and provisions for repayment of unspent financial contributions.

### **Legal considerations**

400 Under the arrangements set out in Article 7 of the Order and the powers conferred by Section 2A of the Town and Country Planning Act 1990 the Mayor is the Local Planning Authority (LPA) for the purposes of determining this planning application ref: 19/0510/FUL.

401 Section 35 of the Greater London Authority Act 2007 inserts section 2F into the Town and Country Planning Act 1990 a requirement that for applications the Mayor takes over, the Mayor must give the applicants and the LPA the opportunity to make oral representations at a hearing. He is also required to publish a document setting out:

- who else may make oral representations;
- the procedures to be followed at the hearing; and,
- arrangements for identifying information, which must be agreed by persons making representations.

402 The details of the above are set out in the Mayor's Interim Procedure for Representation Hearings at the Greater London Authority during the Covid 19 Pandemic which reflects, as far as is practicable, current best practice for speaking at planning committee amongst borough councils.

403 In carrying out his duties in relation to the determination of this application, the Mayor must have regard to a number of statutory provisions. Listed below are some of the most important provisions for this application.

404 In determining any planning application and connected application, the Mayor is required by section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine the application in accordance with the Development Plan (i.e. the London Plan and the adopted Local Plan) unless material considerations indicate otherwise.

405 Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that in dealing with such an application the authority shall have regard to:

- a) The provisions of the development plan, so far as material to the application;
- b) Any local finance considerations, so far as material to the application; and

c) Any other material consideration.

406 Section 70(4) defines “local finance consideration” as:

- a) A grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or
- b) Sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy.

407 In this context “grants” might include the Government’s “New Homes Bonus” - a grant paid by Central Government to local councils for increasing the number of homes and their use.

408 These issues are material planning considerations when determining planning applications or planning appeals.

409 National policy is a material consideration. Other guidance, which has been formally adopted by Richmond Council and the GLA (e.g. Supplementary Planning Documents and Supplementary Planning Guidance), will also be material considerations. Those that are relevant to this application are detailed in this Representation Hearing report. It is important to appreciate that these are not parts of the development plan.

410 Officers are satisfied that the current report to the Mayor has had regard to the relevant provision of the Development Plan. The proposed section 106 package has been set out and complies with the relevant statutory tests, adequately mitigates the impact of the development and provides necessary infrastructure improvements.

411 As regards Community Infrastructure Levy (CIL) considerations, the proposal will be required to pay CIL in accordance with the Mayoral and LB Richmond levies taking into account the expected relief from the affordable housing floorspace.

412 In accordance with his statutory duty in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 the Mayor shall have special regard to the desirability of preserving Listed Buildings, their settings and any features of special architectural or historic interest which they possess. The Mayor is also required to give special attention to the desirability of preserving or enhancing the character or appearance of the conservation areas which may be affected by the proposed development in line with the NPPF.

413 Where the Mayor takes over an application, he becomes responsible for the section 106 legal agreement, although he is required to consult the relevant borough(s). In this instance, there have been a series of lawyer led meetings to discuss the section 106 content, and it has progressed on a number of key issues, whilst others remain outstanding at this point in time. Both the Mayor and the borough are given powers to enforce planning obligations.

414 When determining these planning applications, the Mayor is under a duty to take account of the provisions of the Human Rights Act 1998 as they relate to the development proposal and the conflicting interests of the applicants and any third party affected by, or opposing, the application, in reaching his decision. Planning decisions on the use of land can only be taken in line with the Town and Country Planning Acts and

decided in accordance with the development plan unless material considerations indicate otherwise.

415 The key Articles to be aware of include the following:

- (a) Article 6 - Right to a fair trial: In the determination of his civil rights and obligations... everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.
- (b) Article 8 - Right to respect for private and family life: Everyone has the right to respect for his private and family life, his home and his correspondence.
- (c) Article 1 of the First Protocol - Protection of property: Every person is entitled to the peaceful enjoyment of his possessions.

416 It should be noted, however, that article 8 and article 1 of the first protocol are not absolute and set out circumstances when an interference with a person's rights is permitted i.e. necessary to do so to give effect to the Town and Country Planning Acts and in the interests of such matters as public safety, national economic well-being and protection of health, amenity of the community etc. In this case this Representation Hearing report sets out how this application accords with the Development Plan. Whilst there are impacts on neighbours these are justified in the public interest as described in the planning analysis above. Accordingly, they represent a proportionate and justified interference with convention rights (article 8 and article 1 of the first protocol).

417 Regulation 122 of the Community Infrastructure Levy Regulations 2010 states that a section 106 planning obligation may only constitute a reason for granting planning permission for the development if the obligation is necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. These are now statutory tests.

418 The Equality Act 2010 and the Public Sector Equality Duty provides that in exercising its functions (which includes the functions exercised by the Mayor as Local Planning Authority), that the Mayor as a public authority shall amongst other duties have due regard to the need to a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

419 The protected characteristics set out in the Equality Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The Equality Act acknowledges that compliance with the duties set out may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Act.

420 Officers are satisfied that the application material and officers' assessment has taken into account the equality and human rights issues referred to above. Particular matters of consideration have included provision of accessible housing and parking bays, the provision of affordable and family housing. In officers' view the grant of planning permission would be compatible with the Mayor's duty under s149 of the Equality Act 2010.



## Conclusion and Planning Balance

421 As detailed above, Section 38(6) of the Planning and Compensation Act 2004 requires matters to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

422 The Mayor is also required to consider the likely significant environmental effects of the development and be satisfied that the importance of the predicted effects and the scope for reducing them, are perfectly understood.

423 As set out in paragraph 2 above, GLA officers consider that the proposal conforms overall with the development plan. When considering the proposals, GLA officers have applied the approach in Section 16 of the NPPF and required by the statutory duties relevant to the protection of heritage assets.

424 In preparing this report, officers have taken into account the likely environmental impacts and effects of the development and identified appropriate mitigation action to be taken to reduce any adverse effects. In particular, careful consideration has been given to the proposed conditions and planning obligations which would have the effect of mitigating the impact of the development.

425 This report has considered the material planning issues associated with the proposed development in conjunction with all relevant national, regional and local planning policy, and has found that the proposed development is acceptable in terms of land use principles (including mixed use development, loss of retail, commercial uses and residential uses); housing (including delivery of affordable housing, tenure, mix, density, quality); design (including urban design, tall buildings, public realm, play space, historic environment, views); inclusive design; residential amenity (including daylight and sunlight, overshadowing, privacy/overlooking; noise/disturbance); sustainable development (including climate change mitigation and adaption, microclimate, ecology, trees and urban greening, flood risk and sustainable urban drainage); other environmental issues (including air quality, contaminated land and waste management); transport, including parking provision; socio-economic issues (including arts and culture); and; mitigating the impact of development through planning obligations and conditions.

426 Accordingly, the recommendations set out at the beginning of this report are proposed. A summary of the key planning considerations which support the grant of planning permissions is contained in paragraph 2 above.

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for further information, contact GLA Planning Unit (Development & Projects Team):

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# **Appendix A St George and Marks & Spencer January 2022 Regulation 18 Representations**



## **Draft Local Plan Pre-Publication Consultation**

**From 10 December 2021 to 31 January 2022**

### **RESPONSE FORM**

The Council is inviting comments on the first draft of the Local Plan.

The draft Local Plan sets out a 15-year strategic vision, objectives, place-based strategies and the overall spatial strategy for the borough as well as the planning policies that will guide future development in the borough. It looks ahead to 2039 and identifies where the main developments will take place, and how places within the borough will change, or be protected from change, over that period. In addition, the draft Local Plan sets out the site allocations that are considered to assist with the delivery of the vision and strategy of the Plan. This is of particular importance for ensuring there is sufficient land for employment, retail, housing and social infrastructure.

We would like to hear the views from our local communities, businesses and other key organisations on the draft Plan.

#### **How to respond**

Please read the consultation documents and other background information made available on the Local Plan website. To view the draft Local Plan and take part in the consultation, visit [https://www.richmond.gov.uk/draft\\_local\\_plan\\_pre\\_publication\\_version](https://www.richmond.gov.uk/draft_local_plan_pre_publication_version)

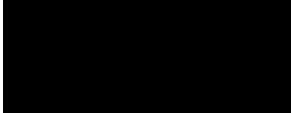


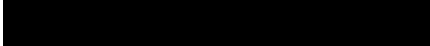
#### **You can respond on the consultation documents in the following ways:**

- Online response form through our **consultation portal** <https://richmond-consult.objective.co.uk/kse>
- Email to **LocalPlan@richmond.gov.uk** this response form (a PDF and Word version of the form can be found on the Council's website at [https://www.richmond.gov.uk/draft\\_local\\_plan\\_pre\\_publication\\_version](https://www.richmond.gov.uk/draft_local_plan_pre_publication_version)). In the form in 'Word' format you can type in your response and return it as an email attachment
- Post a hard copy of the form to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ.

All responses must be received by Monday **31 January 2022**.

#### **This form has three parts:**

- Part A – Personal details and about you
- Part B – Your general views
- Part B – Your detailed response

Part A: Personal Details		
	1. Personal Details *	2. Agent's Details (if applicable)
Title	St George Plc and Marks & Spencer	
First name		
Last name		
Job title (where relevant)		
Organisation (where relevant)		Avison Young
Address		
Postcode		
Telephone		
E-mail address		

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

Part A: About You...		
3. Please tell us about yourself or who you are responding on behalf of...( tick all which apply)		
Do you live in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you work in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you run a business in the borough?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Are you a student in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a visitor to the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

#### Data protection

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

The Council's Privacy Notice is published on the webpage [www.richmond.gov.uk/data\\_protection](http://www.richmond.gov.uk/data_protection)

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



**Part B: Your General Views**

**4. Do you agree or disagree with the Strategic Vision? (section 3)**

Strongly Agree     Agree     Neither Agree/Disagree     Disagree     Strongly Disagree

Any comments: No comments

**5. Do you agree or disagree with the Strategic Objectives? (section 3)**

Strongly Agree     Agree     Neither Agree/Disagree     Disagree     Strongly Disagree

Any comments: No comments

**6. Do you agree or disagree with Policy 1. Living Locally and the 20-minute neighbourhood? (section 4)**

Strongly Agree     Agree     Neither Agree/Disagree     Disagree     Strongly Disagree

Any comments: No comments

**7. Do you agree or disagree with Policy 2. Spatial Strategy: Managing change in the borough? (section 4)**

Strongly Agree <input type="checkbox"/>	Agree <input type="checkbox"/>	Neither Agree/Disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly Disagree <input type="checkbox"/>
---	--------------------------------	---	-----------------------------------	--

Any comments: No comments

**8. Do you agree or disagree with the place-based strategies? (sections 6 to 14)**

Strongly Agree <input type="checkbox"/>	Agree <input type="checkbox"/>	Neither Agree/Disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Strongly Disagree <input type="checkbox"/>
---	--------------------------------	---	-----------------------------------	--

Any comments:

We have comments regarding the place based strategy for Kew. Please refer to attached report.

## Part C: Your Detailed Response

### 9. To which parts of the draft Local Plan does your response relate to?

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	See attached report
		Paragraph number(s)	See attached report
		Policy no./name	See attached report
		Place-based strategy	See attached report
		Site Allocation(s) no./ name	See attached report
		Maps	See attached report
		Tables	See attached report
Sustainability Appraisal Report	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	<input checked="" type="checkbox"/>	Urban Design Study (2021) Retail and Leisure Needs Study (Part 1) (2021) Please see attached report	

### 10. Please give details below to set out your representation.

**Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.**

These representations have been prepared by Avison Young (with input from JTP, Montagu Evans, and Energist) jointly on behalf of St George Plc (SG) and Marks and Spencer (M&S), who are the owners of the Kew Retail Park site (referred to as the 'Landowners' from hereon).

The Landowners welcome the general direction of the Regulation 18 draft Local Plan and strongly support the proposed allocation of the Kew Retail Park site for redevelopment. The principle of redeveloping the site is firmly aligned with the objectives of national and London Plan policy and it represents a fantastic opportunity to bring forward something truly special for the borough.

We are keen to work collaboratively with the Council, the local community, and other stakeholders to prepare a planning application for the redevelopment of the site over the course of 2022 and to deliver that scheme as soon as possible.

Key to this is ensuring that the new local plan includes an appropriately supportive site-specific policy to act as the basis for the determination of the future planning application, and to ensure that the content of the plan as a whole is sound.

The purpose of our representation is to make recommendations on how the site-specific policy could be strengthened and to helpfully identify where we consider there to be soundness issues with the current draft, with regards to the plan being: positively prepared; justified; effective; and consistent with national policy (and in general conformity with the London Plan). In each instance we go on to explain the issue

and propose amendments or other solutions to resolve it to ensure that the plan is progressed on a sound basis.

We first set out our comments regarding the evidence base (the Urban Design Study (2021) and the Retail and Leisure Needs Study (Part 1) (2021)). We then have comments on the Place Based Strategy for Kew, Site Allocation 30 (Kew Retail Park), and Policies 4, 6, 10, 11, 12, 13, 17, 18, 28, 29, 30, 31, 37, 38, and 45 (including Appendix 3).

The Landowners welcome an ongoing engagement and dialogue with the Council on Local Plan as it moves forward.

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

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**



<p>Please see attached report</p>			
<p>Please continue on a separate sheet / expand box if necessary.</p>			
<p><b>Please note</b> your detailed response should cover succinctly all the information, evidence and supporting information necessary to support / justify the response and the suggested change.</p> <p>Following the consultation on the draft Local Plan, we will consider and take account of all responses received. There will be a further opportunity to view and comment on the final draft version of the Local Plan later in 2022, before it will be submitted in 2023 to the Secretary of State for examination in public by an independent planning inspector.</p>			
<p><b>12. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.</b></p>			
<p>If you do not wish to be added to our database or you would like your details to be removed, then please tick this box, complete Part A: Personal Details of this form and return it to us as appropriate.</p>			<input type="checkbox"/>
<p>Signature:</p> <p><small>For electronic responses a typed signature is acceptable.</small></p>	<p>Avison Young</p>	<p>Date:</p>	<p>31/01/22</p>



# Representations to the Richmond Local Plan Pre-Publication Regulation 18 Consultation

Prepared on behalf of St George Plc and Marks & Spencer

January 2022

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## Appendices

**Appendix A** Walk-time to Supermarkets

**Appendix B** Site Ownership Plan

**Prepared by:** Nicholas Alston

**For and on behalf of Avison Young (UK) Limited**

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# 1. Introduction

- 1.1 These representations have been prepared by Avison Young (with input from JTP, Montagu Evans, and Energist) jointly on behalf of St George Plc (SG) and Marks and Spencer (M&S), who are the owners of the Kew Retail Park site (referred to as the 'Landowners' from hereon).
- 1.2 The Landowners welcome the general direction of the Regulation 18 draft Local Plan and strongly support the proposed allocation of the Kew Retail Park site for redevelopment. The principle of redeveloping the site is firmly aligned with the objectives of national and London Plan policy and it represents a fantastic opportunity to bring forward something truly special for the borough.
- 1.3 We are keen to work collaboratively with the Council, the local community, and other stakeholders to prepare a planning application for the redevelopment of the site over the course of 2022 and to deliver that scheme as soon as possible.
- 1.4 Key to this is ensuring that the new local plan includes an appropriately supportive site-specific policy to act as the basis for the determination of the future planning application, and to ensure that the content of the plan as a whole is sound.
- 1.5 The purpose of our representation is to make recommendations on how the site-specific policy could be strengthened and to helpfully identify where we consider there to be soundness issues with the current draft, with regards to the plan being: positively prepared; justified; effective; and consistent with national policy (and in general conformity with the London Plan). In each instance we go on to explain the issue and propose amendments or other solutions to resolve it to ensure that the plan is progressed on a sound basis.
- 1.6 We first set out our comments regarding the evidence base (the Urban Design Study (2021) and the Retail and Leisure Needs Study (Part 1) (2021)). We then have comments on the Place Based Strategy for Kew, Site Allocation 30 (Kew Retail Park), and Policies 4, 6, 10, 11, 12, 13, 17, 18, 28, 29, 30, 31, 37, 38, and 45 (including Appendix 3).
- 1.7 The Landowners welcome an ongoing engagement and dialogue with the Council on Local Plan as it moves forward.



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## 2. Evidence Base – Urban Design Study (2021)

- 2.1 The Urban Design Study (the “Study”) has been prepared by Arup, on behalf of the London Borough of Richmond upon Thames (“LBRuT”). It was published on 9th December 2021.
- 2.2 Arup also drafted the Urban Design Study for the London Borough of Wandsworth (“LBW”), prepared and published in December 2020 to support the borough’s Local Plan. The LBW Local Plan is in the final stages of the adoption process, having published a Regulation 19 Draft of their Local Plan, with consultation due to end in February 2022. As the LBW local plan is further advanced than the LBRuT, having responded and incorporated changes to their Regulation 18 draft, it provides a useful comparison when assessing the evidence base used in relation to the LBRuT Urban Design Study (2021) and the consequent drafting of planning policies set out in the borough’s Regulation 18 Draft Local Plan.
- 2.3 Studies and Supplementary Planning Documents (adopted and in draft) prepared by other London planning authorities, specifically concerning the development of tall buildings also provide further opportunities to compare the detail of supporting evidence base used across London and setting parameters for future tall building development.
- 2.4 This section is structured in the following way:
1. We describe the structure of the Urban Design Study (2021);
  2. We provide a commentary on the Study’s content, focussing on the soundness of the supporting evidence data; and
  3. Analysis of the Kew Retail Park.
- 2.5 We provide a summary of the methodology and logic flow of the Study because it sets out the basis for drawing conclusions about where tall buildings are likely to be acceptable in the future. That methodology is crucial in understanding the soundness of the evidence base.

### **(1) Structure of the Technical and Baseline Study**

- 2.6 Sections 1 to 3 of the Urban Design Study (2021) provide an introduction to the LBRuT, as well as provide an overview of the methodology which underpins the evidence base. It includes a summary of the borough’s built and ecological environment, as well as townscape character assessments for identified areas, separated into sub-character areas within wider areas known as “Places”. Character assessments for each “area” include a brief overview of key local characteristics, the identification of valued and negative features, building typologies, concluding with a sensitivity value, outlining the appropriateness for change/development within the area.
- 2.7 Section 4 identifies capacity for growth within each identified sub-character area, providing a high-level evaluation of the potential for growth across the borough. The capacity for growth of an area is specifically concerned with the potential for tall buildings within the borough, utilising the assessment set out within the character assessments in Section 3.0 of the Study as a supporting evidence base. To inform an area’s capacity for change, Sensitivity to Change and Probability of Change are calibrated using a matrix (Figure 2.3 of this note) in order to determine the ‘Development Capacity’ for an area. Such conclusions and quantitative figures are then used for the identification of ‘Tall Building Zones’, also identified and set out in Section 4 of the Study.
- 2.8 Section 5 of the Study provides general design guidance for the borough, including guidance for design of tall buildings, small sites and riverside areas. Here, the Study provides specific design guidance concerning each sub-character area, setting out a ‘Character Strategy’ for each area,

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identified on a sliding scale identifying a broad strategy for forward planning and future management.

- 2.9 Appendix A provides the supporting evidence and justification for the identified heights for each 'tall building zone'. Appendix B sets out a detailed description of the methodology underpinning the Study. A review of relevant Planning Policies and an overview of the design quality of ten recent developments within the borough is located in Appendix C, whilst Appendix D contains an overview of predominant building typologies within the borough.
- 2.10 Proformas informing character assessments are laid out in Appendix E, whilst a summary of public consultation undertaken is laid out in Appendix F. This completes the Study.

## **(2) Detailed Commentary**

- 2.11 We find the general underlying principles of the Study sound and well justified. We support the need to identify specific locations for tall building development within the borough, in line with Policy D9 (Part B) of the London Plan 2021, and we agree with the general findings that Richmond and its surrounding environs needs a positive framework for development in consideration of the significant housing pressures facing the Borough. Carefully planning for growth and ensuring development responds to local context underpins good plan-making. The general philosophy of the Study supports this approach and is welcomed.
- 2.12 We agree with the approach and adopted methodology set out in detail in Section 4, supported by a relatively comprehensive evidence base in Appendix B. This approach is the same methodology set out in the Urban Design Study prepared by Arup to support the LDW Draft Local Plan (now at Regulation 19 stage) and is based on the accepted and well adopted framework for assessment of townscape and visual effects, set out in the Guidelines for Landscape and Visual Impact Assessment (Third Addition) 2013. The methodology underpinning the Study is therefore considered to be sound. It must be noted that the LBW Draft Local Plan is yet to be found sound, though at Regulation 19 stage, it has benefitted from Regulation 18 consultation.
- 2.13 Whilst we agree within the underpinning methodology applied to inform the findings of the Study, we disagree with Arup's conclusions in relation to 'Sensitivity to Change', 'Probability of Change', which link directly to the 'Development Capacity' of an area – as set out in the matrix at Table 1 on Page 234 of the Study (see Figure 2.3). This is relevant in relation to the Kew Retail Park site and wider East Kew Mixed Use Character Area (Area G3).
- 2.14 Further to the implementation and application of the supporting methodology, we are concerned with the lack of detail set out in the supporting evidence data, particularly that used to underpin policies defining where tall and mid-rise buildings are considered appropriate. We have further concerns with the identification of 'Tall Building Zones' which identify specific scales of development, which, when coupled with a cursory analysis of the surrounding townscape character of the area, is not justified and considered unsound. We cover each point in detail below, with specific reference to Sub-Character Area G3: East Kew Mixed Use Area, as well as Kew Retail Park.

### **Evidence Data**

- 2.15 Page 178 of the Study comprises an overview of the townscape character of the East Kew Mixed Use Area (identified at Figure 2.1). The Study states that the East Kew Mixed Use area (Area G3) has a 'mix of features, but lacks a cohesive layout', and that the area 'lacks identity, with little obvious relationship with its geographic context, including the adjacent River Thames'. Whilst we generally agree with the findings of the townscape character assessment of the area, we have concerns with the level of detail provided and question its ability to support the parameters set out in draft policies

within the LBRuT Draft Local Plan. We question its ability to support references to specific scales of development, along with set limitations on height and massing, as set out within the current draft Site Allocations and the wider Place-based Strategies.

2.16 The notion that the Study is not supported by a sufficient and well-informed assessment is endorsed by introductory text at Page 17, which states:

‘The Study is intended to be an overview, rather than a detailed analysis’

2.17 Additionally, in relation to the sensitivity assessment, the Study states:

‘It should be noted that the sensitivity assessment has been undertaken at a borough-wide scale and is therefore necessarily broad-brush in its application. Within each of the areas identified there may be specific sites with a high or lower sensitivity than illustrated.’

Figure 2.1: East Kew Mixed Use Character Area Plan. Figure 278 of Arup’s Urban Design Study (2021)



2.18 In relation to the East Kew Mixed Use character area (Area G3), the identified area includes West Park Avenue. Given that this is area is more similar in character to Kew Residential (Area G2), we would suggest that the boundary is amended to better reflect the distinction between these character areas. A revised boundary could run along the Kew Meadow Path which naturally separates the Kew Retail Park site and West Park Avenue with mature trees of significant height. Everything to the south of West Park Avenue should remain in the East Kew Mixed Use area (Area G3).

- 
- 2.19 The assessment of the East Kew Mixed Use area (Area G3) sets out a high-level summary of the townscape characteristics of the area. This is essentially an overview, highlighting overarching features of the area's townscape character, including a short list of positive and negative townscape features. Negative features for the character area are identified within the Study at Page 180. These are identified as the following:
1. Lacks coherence in layout, which gives the townscape poor legibility;
  2. Lack of character and sense of identity;
  3. Impermeable boundaries and blurred divisions between public and private space makes the area feel unwelcoming in places;
  4. Poor relationship with and connectivity to the Thames corridor, from which it seems disconnected;
  5. Mortlake Road (A205) forms a busy, southern boundary with little sense of place.
- 2.20 From undertaking our own assessment of the East Kew Mixed Use Area (Area G3), whilst we agree with the negative townscape features identified by Arup and set out above, we would go further in our assessment of the area, adding that the area:
6. Is divorced from the high quality, residential townscape area of Kew Residential (Area G2);
  7. Has a coarse Urban Grain that starkly contrasts with the local context which is largely suburban speculative terrace housing together with large format buildings such as the National Archives;
  8. Poor architectural treatment of large commercial buildings within Kew Retail Park;
  9. Large areas of hardstanding associated with the Kew Retail Park; and
  10. High levels of vehicular traffic associated with the Retail Park.
- 2.21 As outlined in points 6-10 above, we consider the East Kew Mixed Use area is divorced from its surroundings' locality, particularly the superior townscape quality of the Kew Residential Area (Area G2) and the River Thames to its north-east.
- 2.22 Within their study, Arup identify five Valued features of the area (Page 180). These are as follows:
1. Ecological and biodiversity value of areas of woodland and scrub, including areas designated as OSNI and SINC (borough grade II) at Kew railway bridge and Kew Meadow Path next to the public right of way;
  2. Proximity to the River Thames and Access to the Thames Path;
  3. The role the area plays as a setting to the River Thames and Thames Path, including the dense trees and vegetation which create a perception of greenness with few views of development from the Thames Path, river, the opposite bank in LB Hounslow and in views west from Chiswick Bridge;
  4. Allotment next to the Thames Path;
  5. The extensive landscape setting around Kew Riverside residential development which integrates buildings well into their surroundings.
- 2.23 In our judgement points 2, 3 and 5 of these 'Valued Features' constitute repetitions, and can be summarised as follows:
- 'The area's dense vegetation coverage provides a perception of greenness and screening in relation to the River Thames, evoking an extensive landscape setting which positively contributes to the River's setting.'***
- 2.24 In relation to the design guidance for the East Kew Mixed Use area (Area G3), the Study states that tall buildings are to be set in landscape (Page 302). We do not consider this an appropriate approach to the urban design for the area, given its urban context. The guidance goes on to state that development within the area should *'Improve connectivity within the area, and to the riverside'*. As



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referenced by Arup within the Study (Page 302), the area comprises numerous private plots of land, making improved connectivity, especially along the eastern boundary of the Kew Retail Park site, difficult to achieve. This demonstrates the need for a detailed townscape character assessment and site analysis to fully understand the constraints and complexities of the Kew Retail Park site and to better inform the proposed design guidance.

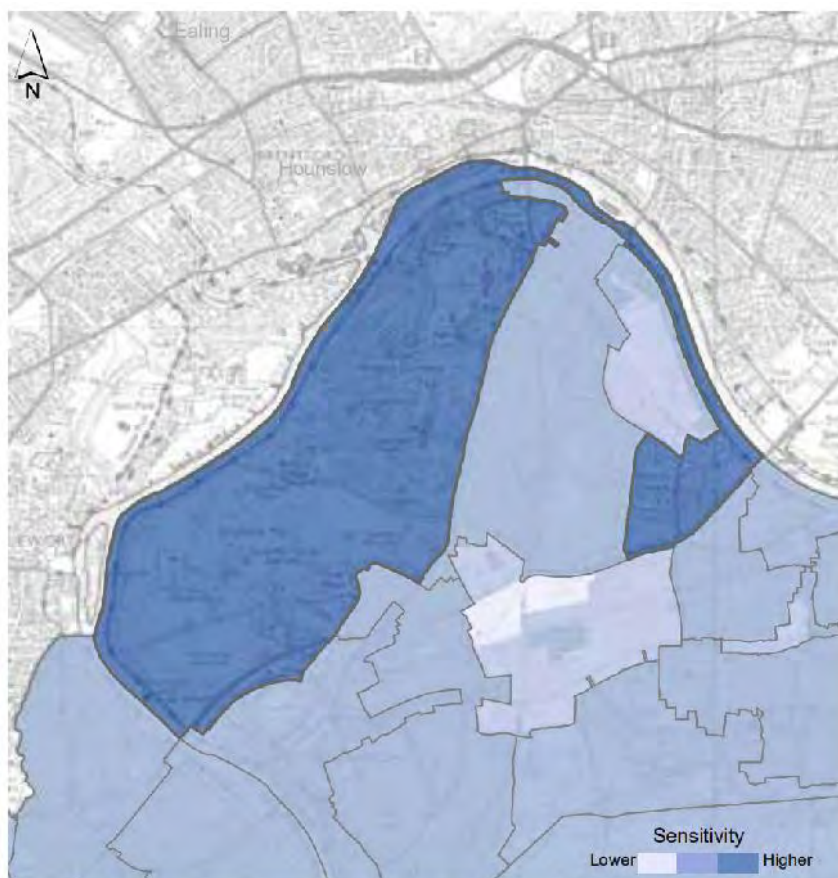
- 2.25 Given the weight attributed to townscape character within planning decisions, the need for future development to contribute positively to the borough's rich townscape, as well as the weight its attributed in setting our specific scales and levels of development throughout the borough, we are concerned with the lack of assessment undertaken throughout the Study, particularly in relation to townscape analysis of specific character areas.
- 2.26 The Study fails to identify existing tall building development within the borough. Whilst we agree with the statement made at Page 43 that *'modern tall buildings and tower blocks are relatively rare'* across the borough, tall buildings do exist, away from the areas of Twickenham town centre and East Twickenham local centre. This includes relatively modern residential development at Vineyard Heights to the east of Chiswick Bridge, as well as the former Stag Brewery fronting the River Thames and the National Archives at Kew. This highlights disparities within the evidence base and the lack of a thorough, granular assessment.
- 2.27 A granular analysis of townscape characteristics is required to provide a sound understanding of the existing and emerging context to inform specific development parameters for sites within the borough. The Study identifies specific parameters for tall building development, identified as 'Tall Building Zones' within Appendix A. These 'Zones' are specific and constrained and are not considered to be supported by sufficient supporting evidence to justify the identification of exact/precise parameters of development.
- 2.28 Section 4.6 (Page 240) provides a definition of tall buildings in LBRuT, based on an analysis of existing tall buildings, consented schemes and masterplans, as well as scenarios prepared specifically for the study.
- 2.29 Firstly, there is a presumption here that tall buildings are only acceptable within town centres, or where existing development has a negative impact/contribution on the character of an area.
- 2.30 In our considerable experience of working on tall building projects, tall building development is capable of being acceptable in areas of lower height. What matters is the quality of their design and the way in which they respond and relate to the existing and emerging context, and the way the transition between scales is manifested. There are many examples of where this approach is acceptable in townscape terms and in sensitive heritage locations.
- 2.31 Indeed, London Plan (2021) Tall Building Policy D9 allows for such an approach to be taken. We highlight the recent Hillingdon judgement [Case Ref: CO/1683/2021] which makes clear that tall buildings can be found to be acceptable in areas that are not identified as being acceptable by local planning authorities, where they meet the terms of Part C of D9. Thus, the analysis of acceptability should allow for some flexibility when forming a broad definition of where tall buildings are permissible (we refer to draft Policy 45 which we highlight in Section 21 of this report, and where we make a similar comment).
- 2.32 Page 237 of the Study states that the evidence base does not show, nor considers where newly consented tall buildings are expected to be built across the borough in the coming years.

- 2.33 Emerging context is a weighty material consideration when understanding how a place/area is to evolve over time, and where intensification of development has been established and is likely to be accepted in the future.
- 2.34 In relation to East Kew Mixed Use Area (Area G3), this includes the omission and lack of reference to the Kew Biothane Plant redevelopment, comprising the introduction of a six-storey, specialist residential development fronting the River Thames (ref: 18/3310/FUL). Whilst reference is made to the Kew Biothane site later in the Study (Page 302 & 375), these references are not carried through to the wider assessment of 'Probability of Change' and 'Development Capacity' conclusions. Furthermore, such emerging context/development is a key consideration when setting development/height parameters for tall building zones within an area. We consider this point again when discussing the Kew Retail Park site (Section 2.3).

### Applying the Methodology

- 2.35 In relation to the East Kew Mixed Use area (Area G3), if the supporting evidence data was underpinned by a proper and thorough assessment, which would have identified the significant imbalance between positive and negative townscape features within the area (as reference in Paras. 2.19 – 2.23), the resulting sensitivity would be identified as Low, rather than the currently identified Medium, as illustrated at Figure 2.2.

Figure 2.2 Sensitivity Plan. Figure 268 of the Urban Design Study (2021)



- 2.36 It is stated at Page 238 of the Study that Kew Retail Park is identified as being known to benefit from an emerging masterplan or subject to on-going /emerging redevelopment opportunities. Within the Draft LBRuT Local Plan, the Retail Park has been provisionally allocated for a *'Comprehensive residential-led redevelopment of the site with a range of commercial uses, including retail, offices and*

*leisure*'. It is therefore widely known, and more importantly, LBRuT anticipate significant redevelopment of the site over the next plan period (circa. <5 years).

- 2.37 We question, therefore, the area's identification as having only a Medium 'Probability to Change'. Whilst we acknowledge the East Kew Mixed Use Area comprises land beyond the Retail Park boundaries, the Retail Park and associated large surface car park covers approximately 35-40% of the sub-character area's total land area. Significant intensification and redevelopment should therefore be expected and anticipated to come forward within the area. This, coupled with the draft site allocation at the Kew Biothane site, and the identification of the long-term opportunity to transform the character of the area (Page 302 of the Study), means the Probability of Change for the East Kew Mixed Use area should be elevated to High.
- 2.38 Putting a 'Sensitivity to Change' of Low and a 'Probability of Change' of High through the Study's Matrix (see Figure 2.3), we conclude that the 'Development Capacity' of the East Kew Mixed Use area (Area G3) should be scored at 7, the highest rating.

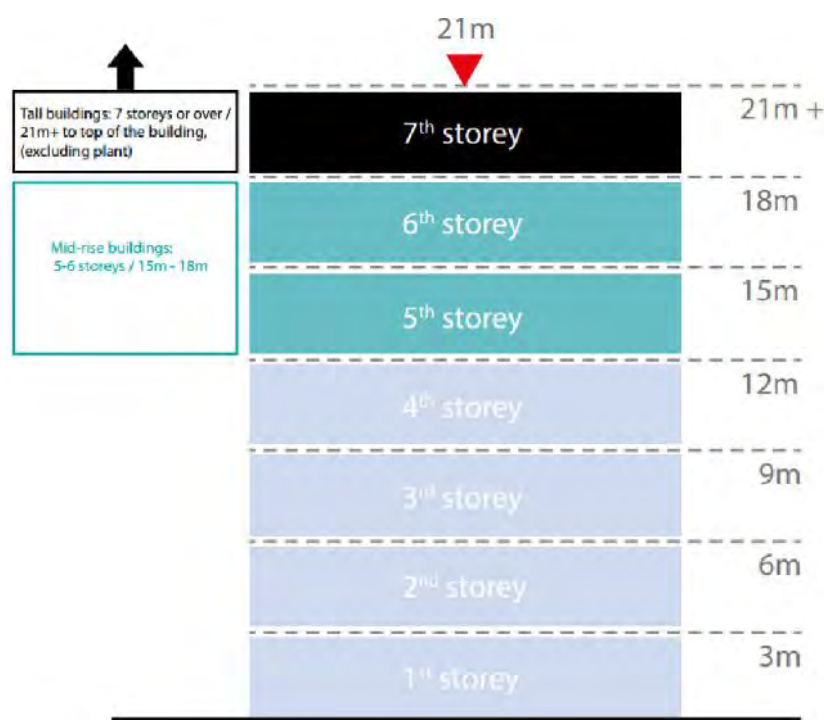
Figure 2.3: Development Capacity Matrix (Table 1 of the Urban Design Study, 2021)

		Probability			
		High	Medium	Low	Very low
Sensitivity	High	5	3	2	1
	Medium	6	4	3	1
	Low	7	5	3	2

### Definition of Tall Buildings

- 2.39 As stated in Para. 2.24, Section 4.6 (Page 240) of the Study provides a definition of what is considered a tall building within LBRuT. A tall building is defined within the Study as: 'Buildings which are 7 storeys or over, or 21m or more from street level to the top of the building, whichever is lower'.
- 2.40 There is a lack of consistency with the implementation of LBRuT's definition of a 'tall building'. We have identified references within the Study where Arup have identified buildings which are mid-rise (by LBRuT's definition), incorrectly as 'tall buildings'. Page 237 of the Study identifies the extant permission at Kew Biothane Plant within the East Kew Mixed Use area (Area G3) as a 'Consented Tall Building'. As set out at Page 375 of the Study, critical praise is given to the design rationale behind the redevelopment proposals presented at Kew Biothane. As stated, the maximum height of the extant permission on the site is six-storeys, therefore constituting a 'Mid-Rise Building' as illustrated in Figure 2.4 below. This illustrates one example that reflects a broader lack of consistency.

Figure 2.4: Definition of tall and mid-rise buildings for Richmond (Figure 374 of the Urban Design Study, 2021)



### Tall Building Zones

- 2.41 Section 4.6.4 of the Study uses the constraints and opportunities identified in the preceding sections to identify 'Tall Building Zones'. The Study states: *'The following pages provide the appropriate height and a description of the tall building zones and mid-rise building zones within each Place'*.
- 2.42 Appendix A provides the supporting evidence and justification for the extents and appropriate heights of each of the identified tall building zones. The Study states at Page 316 that: *'The broad areas identified in the tall buildings strategy have been analysed to understand whether there are individual zones within them that have the potential to accommodate tall buildings'*.
- 2.43 The analysis identifying if an area is appropriate for tall buildings includes a high-level assessment of the potential impacts a tall building may have on:
- Townscape character, including relationship to existing landmarks and the River Thames;
  - Views and visual amenity, including long range views (particularly local or strategic views); and
  - Heritage assets, including the setting of Kew Gardens World Heritage Site, Registered Parks and Gardens, Scheduled Ancient Monuments, conservation areas and listed buildings.
- 2.44 Zones are then tested using analysis of:
- Scenarios developed specifically for the Urban Design Study;
  - Consented tall buildings and/or masterplans; and
  - Existing tall buildings and how they contribute (positively, negatively or neutrally) to the existing character of an area.
- 2.45 The Study states that the scenarios developed in order to test the appropriateness of Tall Building Zones have been prepared solely for the purpose of testing additional height and density at a site and are not intended to be viable site-specific masterplan proposals (Page 316). This approach ignores the importance of viability in order to ensure development can, and ultimately will be delivered on a site and is therefore not sound.



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- 2.46 The Study further states at Page 241 that, *Tall buildings shall: incorporate an appropriate range of building heights and open spaces*. Whilst this statement is generally supported, its implementation in practice will be difficult to achieve if there is not a ranged figure for tall building zones. This is particularly relevant in relation to the Kew Retail Park site, where the current drafting of LBRuT's policy restricts development to 7-storeys. This is discussed further at Paras. 2.52 – 2.60.

### **Spatial Hierarchy**

- 2.47 In Section 5 of the Study (Page 264), it is stated that, *Tall buildings require more space around them to ensure they integrate well into the overall townscape*. This is not necessarily the case, and the Study presents little evidence to support this statement. The example given is, *In many estates this is managed through extensive parkland settings with mature trees*, which suggests a typical mid-late-20<sup>th</sup> century tower block set in surrounding landscape. It is unlikely that this example of urban design would be appropriate and suggesting such development would limit the ability to create a fine grain masterplan that integrates with the surrounding urban fabric, resulting in an inefficient use of land.
- 2.48 The Study goes on to suggest (Page 264) that tall buildings can soften their impact at ground level through *generous walkways and mature planting*. As stated later in this representation in Section 21, this appears to conflict with the policy set out in London Plan Policy D9, which states, *The function of the base should be to frame the public realm and streetscape, articulate entrances, and help create an attractive and lively public realm which provides a safe, inclusive, interesting, and comfortable pedestrian experience*.

### **(3) Analysis of Kew Retail Park Site**

- 2.49 Kew Retail Park is located to the west/south-west of the River Thames, accessed through a residential, suburban neighbourhood, situated off Bessant Drive. The site comprises a large retail unit of a large footplate, surrounded to its south and west by large and associated car-parking facilities. To the east, modern, mid-rise, residential development sits between the site and the western towpath of the river, whilst to the north-east, the large format building of the National Archive is located circa. 120m from the site's northern/north-eastern boundary.
- 2.50 The Retail Park contrasts greatly with the suburban and residential townscape character which prevails throughout the surrounding local context. Whilst landscape buffering and sapling trees within its carpark help soften its appearance to a degree, its commercial townscape character greatly detracts from the high-quality, residential townscape seen to the south and west. Furthermore, blank elevations with little articulation provide little to no permeability through the site, acting as a solid barrier to the River Thames to its east.

Figure 2.5 Satellite Image of Kew Retail Park Site (Outlined in Red)



- 2.51 It is noted within the Study that the site lacks a cohesive layout, has a poor legibility or identity and does not positively contribute to the character of the wider area. As stated above, in our judgement, the analysis of the existing situation at Kew Retail Park should also conclude that the Site detracts from the high-quality residential townscape seen across neighbouring sub-character areas, as well as detracting from the relatively high-quality modern residential development and associated landscaped areas closer to the River to the north-east. Whilst we agree with the Character Strategy set out at Page 302 of the Study, in that there is a long-term opportunity to transform the area's character, the Study can and should go further to identify significant opportunities to introduce high-quality intensification on the Retail Park site, introducing development that will make best use of the land and contribute positively to the surrounding area.
- 2.52 The scenario presented for Kew Retail Park tests two possible building heights: seven and nine-storeys. In reference to nine-storeys (Figure 2.6), the Study states that a Zone of Theoretical Visibility (ZTV) was produced to identify visual receptors. The Study does not present/illustrate the ZTV concerning the nine-storey scenario. This should be made available for review and comment.
- 2.53 The ZTV presented at Page 336 of the Study (Figure 2.6) illustrates the ZTV of seven-storeys located at the centre of the Site. Firstly, we welcome Richmond's identification of Kew Retail Park as being able to accommodate tall buildings. Whilst welcomed, it is demonstrated in the presented ZTV that visibility of such a scale (seven-storeys) is limited to the local area, with partial visibility from the surrounding conservation areas and neighbouring sub-character areas. The Study notes that there is no visibility from within Kew Gardens at seven-storeys. We question why the Study does not take into account/test an eight-storey scenario on the Site.



2.54 Visibility of such a scenario (eight-storeys) would continue to be limited to the local area, whilst continuing to sit comfortably within the viewpoints identified at Page 337 of the Study (Figures 2.9 & 2.10). Eight storeys at the site would not change the conclusions reached in relation to seven storeys, in that the scale of the development sits comfortably with the scale of existing development along Defoe Avenue, and massing does not extend above the vegetated skyline of the River Thames corridor.

*Figure 2.6: Kew Retail Park Zoner of Theoretical Visual Influence (seven storeys) (Figure 440 of the Urban Design Study, 2021)*

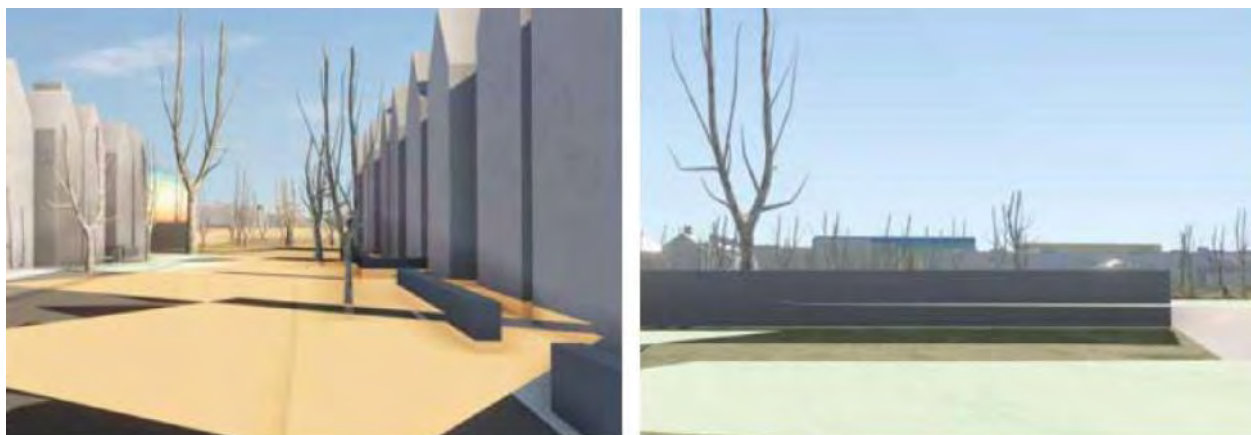


*Figure 2.7: Kew Retail Park Massing Model Illustrating Nine-storeys on the Parameters of the Site (Figure 439 of the Urban Design Study, 2021)*



- 2.55 Whilst it is understood that the scenario presented at Kew Retail Park is a conceptual model, a future redevelopment proposal at the Retail Park would comprises high-quality articulation, orientation, profiling and be of varied heights across the Site.
- 2.56 Presenting a block model of nine-storeys across the site (Figure 2.7) does not represent a viable and rational form of development that would come forward, or one that would be considered acceptable.
- 2.57 With the limited analysis of the townscape character of the area, the lack of detailed assessment and testing of numerous viewpoints and differing scenarios, the precise height parameters of seven-storeys is unjustified. The appropriate location and heights of buildings should be subject to detailed testing and the Landowners would welcome involvement in this process. If further testing is not to be undertaken, a broader approach to potential height on the site should be implemented, setting a ranged figure between five to nine-storeys, with the acceptability of any future proposals based on the merits of an application/design rationale, even if development exceeds these figures.
- 2.58 The justification for the building zones set out on Page 335 of the Study require further detailed investigation. The Study notes that the mid-rise building zone provides an area of transition to the more modest buildings in the surrounding area. This is true along the western boundary of the site, where it neighbours properties along West Park Avenue, however, it can be argued that this zone should extend to the southern boundary, as the neighbouring properties are also of a similar scale (circa. 4-5 storeys) to what is proposed as being the mid-rise building zone.

*Figures 2.9 (left) and 2.10 (right): Left –VuCity view along Defoe Avenue representing seven-storeys. Right – View from the opposite river bank in LB Hounslow. Figures 441 & 442 of the Urban Design Study, 2021.*



- 2.59 In summary, the scale of any redevelopment of the site should not be constrained by overly restrictive policy requirements that will adversely impact on viability and may prejudice redevelopment proposals. Instead, the scale of development should be optimised, with the focus being on design quality and placemaking, based on sound detailed analysis.
- 2.60 Whilst we agree with the findings of the Urban Design Study that Kew Retail Park is capable of accommodating tall buildings, we find the height parameters presented to be overly conservative and restrictive.
- 2.61 Overall, given the flaws in the Study, we consider that the evidence base is unsound.



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### 3. Evidence Base – Retail and Leisure Needs Study (Part 1) (2021)

- 3.1 The Phase 1 Retail Study, whilst published in 2021 and containing data gathered by the Council and its consultant recently, relies upon historic information, most notably a survey of shopping patterns dating from 2014. Therefore, whilst the Council has indicated that a further (Phase 2) study is to be published in early 2022, the current evidence base is out of date and cannot be relied upon to support the new Local Plan.
- 3.2 Therefore, whilst the preparation of a new retail and town centres study (including a new household survey) is to be welcomed, it must be noted that the Phase 2 study has not yet been published. Given the importance of the new study in its supporting role to retail and town centre planning policies, including specific site allocations, to the soundness of the new Local Plan, interested parties must be given a fair opportunity to comment on the content of the new study and how its recommendations translate to the content of the new Plan.
- 3.3 With regards to the content of the Phase 1 Study, and how this may be taken forward in the next stage of the study, we recommend that the following matters are addressed:
- A restriction on the amount of convenience goods floorspace at Kew Retail Park (KRP) would not be supported by any recommendations in the Phase 1 retail study. A restrictive approach at KRP would require a clear and reasonable justification which is not provided in either the Phase 1 retail study and / or the draft Plan itself. In particular, it is briefly suggested that a restrictive approach would protect the health of town centres but no evidence is provided in order to demonstrate that the provision of replacement / net additional convenience goods floorspace at Kew Retail Park will lead to any harm to nearby defined 'town centres'.
  - The methodology for assessing quantitative retail floorspace capacity. The Phase 1 Study does not appear, as is best practice, to assess current/future quantitative retail needs with reference to the existing performance of stores/centres (i.e. actual turnover v benchmark/average turnover). It ignores current actual trading performance and the specific issues associated with retail provision across the Borough.
  - Consideration of qualitative needs. It is best practice to consider qualitative indicators of need alongside quantitative indicators. This does not appear to be included in the Phase 1 Study. This is considered particularly important in relation to the distribution of retail floorspace in the Borough and the Council's strategy of providing local facilities for the resident population.

## 4. Place Based Strategy for Kew

- 4.1 We support the principle of having a place-based strategy for Kew. We have set out below as tracked changes the amends that we consider necessary to make the strategy sound. We then go on to explain/justify this.

### Recommended Amendments (tracked changes to Reg.18 draft text)

Future development in this place is expected to:

- Conserve the high-quality, traditional, frontages along the parade area by Kew Gardens Station, with opportunities for retaining and enhancing the “spill-out” of venues, including restaurants, cafés, and pubs, to maintain a sense of activity and vibrancy.
- Improve wayfinding at the Station and across the town centre to places of interest such as Sandycombe Road, National Archives and the Royal Botanical Gardens.
- Preserve the openness of the parklands and the riverside, by resisting development which would affect this perception, and restoring historic elements where appropriate.
- In areas deficient in access to Public Open Space, consider opportunities to improve access to existing spaces, either through design and public realm improvements, or where opportunities arise, provide new publicly accessible open space. Open spaces that are currently not publicly accessible, will be encouraged to make them available for public access and use.
- Support greening through conserving and enhancing street trees and planted front gardens with shrubs, small trees and hedges with a focus on biodiversity improvements.
- Contribute to conserving and enhancing the Royal Botanic Gardens, Kew World Heritage Site and surrounds in accordance with Policy 32 Royal Botanic Gardens, Kew World Heritage Site.
- Contribute to conserving and enhancing the significance of the Old Deer Park historic landscape and its features, as set out in the Old Deer Park SPD, including strengthening the southern boundary to reduce the impact and potential encroachment of sports developments, adjacent townscape, and Twickenham Road, on the registered park and garden and conservation area. Support the continued sporting and complementary uses at Pools on the Park and surroundings and Richmond Athletic Association Ground, Old Deer Park.
- Improve and transform parts of East Kew by improving the sense of place, public access and legibility, along with establishing more green infrastructure, particularly street trees.
- Enhance the connectedness of the Thames Path route within the wider Kew townscape and to the adjacent open spaces.
- Contribute to promoting active travel and reducing the dominance of vehicle traffic, including along Mortlake Road (A205) and Kew Road (A307) to reduce their severing impact.

There are opportunities in parts of East Kew for new development to positively contribute to improving the character and addressing negative qualities, creating a sense of activity with an inviting public realm as part of a coherent strategy to improve permeability and active travel links. At Kew Retail Park (Site Allocation 30) there is the opportunity for comprehensive residential-led redevelopment to include an element of replacement retail, a range of and small scale complementary commercial uses, improve the public realm, active travel and links to the River Thames (where feasible). Development in and around Kew Retail Park should be of high architectural quality, informed by a detailed and thorough assessment of the surrounding townscape character, building on the findings of the Urban Design Study (2021) and supported by a comprehensive viewpoint study. There is a tall building zone opportunity (circa 7-87 storeys), surrounded by a mid-rise buffer to provide for a transition to the more modest surrounding area, in accordance with Policy 45 Tall and Mid-Rise Building Zones. Proposals for buildings of height at Kew Retail Park should be supported by sufficient justification, including a comprehensive Heritage, Townscape, and Visual Assessment. Redevelopment at Kew Biothane (Site Allocation 31) is expected to deliver a residential use with associated open space provision.

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## **Explanation/Justification**

- 4.2 The amendments set out above are required in order to ensure consistency with Site Allocation 30, accounting for the recommended amendments set out in the following section.

## 5. Site Allocation 30 (Kew Retail Park)

### Recommended Amendments (tracked changes to Reg.18 draft text)

#### Site Proposal

Comprehensive residential-led redevelopment of the site with the opportunity for an element of replacement retail and a range of small scale complementary mercial uses, including retail, offices (with the provision of affordable workspaces), and leisure. The redevelopment should look to improve the public realm, active transport through the site and links to the River Thames where feasible.

#### Context:

Kew Retail Park is a well-used shopping destination made up of seven large floorplate stores and extensive surface car parking.

There is a need for housing in the borough and this site is considered to be suitable for a substantial provision of new housing units. The Council expects that a policy compliant level of affordable housing is provided.

Due to the site's proximity to the River Thames it is located within Flood Zone 3a (an area at high risk of flooding) and is in a Flood Alert and Warning Area as designated by the Environment Agency. Any redevelopment proposal needs to take this into account.

The existing site is car-orientated, and any proposals should look to increase active travel through the site and towards Kew Station and the surrounding area.

There is an expectation that any redevelopment provides new on-site Public Open Space in accordance with Policy 37 in addition to any external amenity space requirements, delivering multi-functional benefits including for nature conservation and biodiversity value as well as for health and wellbeing of future occupants and users, including surrounding communities.

There should be an improvement to the public realm through high quality landscaping, which can enhance and improve the biodiversity of the site. Tree lined avenues are typical of the area.

Currently the site has boundary treatments which cut it off from the surrounding area, creating almost an island effect. Proposals should be designed to improve the permeability of the site creating connections with the Kew Riverside and the River Thames where feasible.

Whilst the site is not located within a main or local centre, it has for many years proved to be a popular retail destination. It is expected that a substantial element of retail development commercial uses will be retained/replaced on site. Opportunities to improve convenience goods retail provision (in order to be suitable to meet 'main food shop' needs) will be supported in order to contribute towards achieving the 20-minute Neighbourhood objectives of Policy 1. The overall mix of uses, which could include other minor/small scale complementary town centre uses, such as retail, cafes, and offices, should be curated so that they add to the vibrancy and vitality of the new community. The proposed office provision should provide affordable workspace for small and medium sized companies.

While the Sequential and Impact Test requirements of Policy 18 will need to be satisfied at the planning application stage, the requirements to satisfy both tests will be limited in scale and complexity bearing in mind the in-principle acceptability of providing substantial replacement retail floorspace on the site. Proposals that satisfy the Sequential Test and do not have a significant adverse impact on the Borough's town centres will be supported.

Any new convenience retail provision should not exceed the floor space of the existing units, to protect the existing main centre in Kew.

**Continued on following page**



**Cont.**

Development should be of high architectural quality, informed by a thorough assessment of the prevailing townscape character of the area (informed by the Urban Design Study (2021)). The applicant will be required to demonstrate that the proposed development corresponds/relates with the surrounding character areas, including Kew Residential and nearby Kew Gardens, in line with Policy 28.

The Royal Botanical Gardens World Heritage Site is within 500m which will need to be taken into consideration when designing the scheme.

The applicant will be required to submit a full transport assessment completed in accordance with local and London-wide guidance. This will include a detailed assessment of its impact on the local and strategic road network. The applicant is strongly advised to seek pre-application transport and highway safety advice from Borough and TfL Officers before writing their transport assessment.

The Urban Design Study 2021 identifies part of Kew Retail Park as being able to accommodate tall and mid-rise buildings (at least 7-storeys) as a tall building zone (7 storeys) surrounded by a mid-rise buffer zones (5-6 storeys) to provide providing for an area of transition with the more modest surrounding buildings, in accordance with Policy 45 Tall and Mid-Rise Building Zones.

The applicant will be required to submit a full Heritage, Townscape and Visual Impact Assessment, which will include a detailed assessment of the proposed development's potential impact on surrounding heritage and townscape receptors, in line with Policy 45.

Design objectives and general guidance relating to local character of the area, which any redevelopment proposal should have regard to, is also set out in the Urban Design Study 2021, G3 East Kew Mixed Use and in the Kew Village Planning Guidance.

## **Explanation/Justification**

### **1. The Principle of the Allocation**

- 5.1 The principle of allocating the site for comprehensive residential-led redevelopment is firmly encouraged by London Plan Policies SD7, E9, and H1, which require boroughs to realise the full potential of existing out-of-centre retail parks for housing intensification and other uses.

### **2. Site Availability**

- 5.2 The **effectiveness** of the allocation is dependant on whether the land will be made available for development over the plan period, as this determines whether the allocation is deliverable. We set out the key considerations below:

#### Planning Context

- 5.3 The site is developed and in active use. It accommodates a series of warehouse buildings extending to 139,204sqft (12,932sqm) in retail use with extensive associated surface car parking (558 spaces). The buildings accommodate the following occupiers (approximate floorspace (GIA) in brackets):
- Sport Direct (15,904sqft)
  - TK Maxx (14,054sqft)
  - Gap (10,000sqft)
  - Next (includes Costa Coffee) (10,034sqft)
  - Boots (12,000sqft)
  - M&S (include food, non-food, and café) (77,176sqft)

- 
- 5.4 The development was implemented pursuant to outline planning permission ref. 92/1676 which was approved in 1993. Applications for the approval of reserved matters were then subsequently approved. Headline details are as follows:
- The total number of units must be between 3 and 8;
  - Minimum size of a single unit limited to 500sqm (sales area). Total floorspace (GIA) to not exceed 13,935sqm;
  - Opening hour restrictions; and
  - Units shall only be used for the sale of non-food items (except restaurant).
- 5.5 Conditions attached to the operating consent have subsequently been varied, including as follows:
- 95/2073. Use of up to 1.5% of the gross floor area (21sqm) of a unit (no details available) for the sale of baby foods. Personal consent for the benefit of Children's World Ltd. Approved.
  - 97/2469. S.73 application to allow up to 1.5% of the gross floor area (16.89sqm) of unit D (Boots) to be used for the sale of baby and dietary foods. Approved.
  - 99/290. S.73 application to allow 743sqm of the M&S Unit to be used for the sale of food. Approved. Personal consent for the benefit of M&S only (controlled by s.106 agreement).
  - 02/3091. S.73 application to amend opening times of M&S unit. Approved.

#### Site Ownership and Conditions for Making the Site Available

- 5.6 The entirety of the proposed allocation site is under the ownership of SG and M&S:
- M&S own the unit currently occupied by the M&S store;
  - SG own the other retail units; and
  - SG and M&S have joint ownership rights over the car park, servicing areas, and access.
- 5.7 Refer to land ownership plan at Appendix B.
- 5.8 The overlapping ownership rights mean that the ability to bring forward the comprehensive redevelopment of the site is dependent on both landowners being willing to make their land available for development. Their willingness will be dependent on operational and viability based commercial considerations being satisfied, which are different for each landowner. This is in the context that the site is currently in an active, highly valuable use, that is expected to remain viable in the long term. We set out the conditions/requirements for each landowner below:

#### *St George*

- 5.9 St George acquired its part of the site in 2021. While it provides a viable long term income stream, SG's objective is to work with M&S to bring forward the comprehensive redevelopment of the whole site to include a substantial amount of new housing at the earliest opportunity. Clearly this will be significantly influenced by the policies in the new Local Plan.

#### *M&S*

- 5.10 M&S operates two stores within the borough (KRP and Richmond Town Centre) plus food-only stores at Richmond Station (franchise) and Barnes. The KRP and Richmond Town Centre stores complement one another with KRP serving a more regional catchment and the town centre a more local catchment. Both stores trade well. M&S has no intention of closing either store. Both have been identified as priority stores for upgrade/investment as part of M&S's 'Renewal' strategy.
- 5.11 M&S is keen to invest in improving the KRP store as soon as possible. Its options are either to retain and refurbish the existing store or to provide a new replacement store as part of the comprehensive redevelopment of the site (which it would progress with SG). Its willingness to progress the

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redevelopment option will be dependent on feasibility, which will be subject to the following commercial tests being met:

- The replacement store must include replacement comparison goods floorspace plus a minimum 25,000sqft of convenience goods floorspace (net sales area) plus car parking; and
- The KRP store must continue to trade throughout redevelopment which will require the new replacement store to be completed prior to the demolition of the existing store.

#### Timescales

- 5.12 Each of the retail units under SG's ownership are in active use. However the terms of leases allow flexibility in obtaining vacant possession of these units which will be obtained once a planning permission is in place. The existing M&S unit can be vacated following the completion of the replacement store, which in practice will be a key driver in development phasing. It is anticipated that the car park could be vacated and made available for development in phases.

#### Soundness Issues with Current Draft

- 5.13 As explained above, the principal site availability issue is that the willingness of the landowners to bring the site forward for comprehensive redevelopment is dependent on the ability of M&S to provide a replacement store of a minimum specification. In order for the allocation to be **effective** and **positively prepared**, it is critical that it includes express, positive support for substantial replacement retail development (including an increase in convenience retail floorspace) on the site alongside the substantial residential development that the current draft already supports.

### **3. Land Uses (Residential)**

- 5.14 As explained above, part of the site is owned by SG. SG is part of the Berkeley Group which builds homes and neighbourhoods across London, Birmingham and the South of England. Berkeley specialises in brownfield regeneration, reviving underused land to create unique, sustainable and nature-rich places where communities thrive and people of all ages and backgrounds can enjoy a great quality of life. The group as a whole is one of the largest residential developers in London, Berkeley built 3,254 homes in 2020/21 and a total of 18,481 over the last five years (including joint ventures). 2,825 homes were delivered in London, some 10% of London's new private and affordable homes
- 5.15 SG acquired its part of the site in 2021 with the intention of working with M&S to deliver comprehensive redevelopment, including substantial new housing. It has the demonstrable intent and capability to deliver the draft policy requirement of substantial residential development which we strongly support. We note that this is firmly aligned with London Plan Policies E9 C(6), SD6, SD7 and H1 which encourage the redevelopment of out-of-centre retail parks to deliver housing intensification alongside other uses.
- 5.16 We consider the content of the site allocation as relevant to residential development to be sound. However, we note that there is no need to repeat content that is adequately covered in other policies (such as affordable housing).

### **4. Land Uses (Retail)**

#### The Principle of Substantial Retail Use

- 5.17 As explained above, the site currently accommodates 12,932sqm of retail floorspace. Accordingly, the acceptability of substantial retail floorspace on the site is already established in planning terms.

- 5.18 The principle of replacing this existing floorspace is supported by London Plan Policy SD7 (A3) (and Policies E9 C(6), SD6, and H1) which encourage the comprehensive redevelopment of out-of-centre sites such as KRP and confirm the acceptability of including replacement retail floorspace of up to the same existing overall quantum. The policies then confirm the acceptability of increasing the amount of retail where this can be justified by sequential and impact policy tests in accordance with the national planning policy approach to control such matters.
- 5.19 We recommend that this point is confirmed in the policy wording (or supporting text) in order to ensure that the policy is demonstrably **justified** and capable of being implemented in an **effective** manner.

The Area-Specific Need for Improved Access to Convenience Retail Provision

- 5.20 As explained above, the availability of the site for redevelopment is dependent on the provision of substantial replacement retail floorspace (a replacement M&S store). This includes a requirement to increase the amount of convenience goods retail floorspace to a minimum 25,000sqft (net sales area).
- 5.21 The Richmond upon Thames Retail and Leisure Needs Study Phase 1 Update (July 2021) identifies an over-supply of convenience goods retail floorspace in the period to 2029, however long-term growth suggests an under supply by 2039. This is a borough level quantitative assessment of capacity which does not take account of more localised quantitative or qualitative needs.
- 5.22 We consider there to be a need to increase the amount of convenience goods retail floorspace in/around Kew in order to deliver the strategic policies that underpin the draft local plan as a whole – notably the Living Locally/20-Minute Neighbourhood principles of Policy 1 which is at the heart of the local plan. Policy 1 states that the ‘living locally’ concept will be achieved by giving people the ability to meet most of their daily needs (including access to food shopping) within a 20-minute walk from home, with safe cycling and public transport options. As demonstrated in Map 4.1 of the Local Plan, most of the borough is within 800 metres (as the crow flies) of a centre or shopping parade including much of Kew. However, on closer investigation it is clear that existing (and future) residents in much of Kew (including the KRP site) do not live within 20 minutes’ walk of a supermarket that is capable of meeting a ‘main’ food shop need.
- 5.23 Details of the closest supermarkets to the KRP site are set out in Table 5.1 below (refer to walk-distance maps at Appendix A):

*Table 5.1 Existing Local Supermarkets*

Store	Address	Suitable for a Main-Food Shop?	Distance from KRP Site	Walk-Time from KRP Site
M&S	Kew Retail Park	No Top-up Only	-	-
Tesco Express	2-8 Station Parade, Kew, TW9 3PZ	No Top-up only	0.5 miles 0.8 km	11 minutes
Sainsbury's	Lower Richmond Road, TW9 4LT	Yes	1.2 miles 2 km	23 minutes
Waitrose	Upper Richmond Road, East Sheen, SW14 7JG	Yes	1.3 miles 2.1 km	28 minutes

- 5.24 This existing access deficiency (on the basis of the requirements of Policy 1) translates to a qualitative need to improve convenience retail provision in Kew, in order that it is capable of providing for main



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food shop needs (as opposed to just top-up shopping). This need will intensify with the delivery of substantial new housing on the KRP site (as sought by the draft site allocation).

- 5.25 The provision of an improved convenience retail offer as part of the replacement M&S (required to make the site available for development) will satisfy this need, and ensure that the requirements of Policy 1 can be achieved for both existing and future residents in Kew.
- 5.26 Accordingly, in order for the Site Allocation to be **effective** (consistent with the rest of the Plan), **positively prepared** (meets the area's needs) and **justified** (based on evidence) we recommend that it is amended to specifically support the principle of the provision of improved convenience retail goods floorspace on the site as part of the replacement retail development.

#### Restrictions on the Type of Retail Provision (Convenience Goods)

- 5.27 The existing amount of convenience retail floorspace on the site comprises approximately 760sqm (net sales area).
- 5.28 As currently drafted the policy states that '*any new convenience retail provision should not exceed the floor space of the existing units, to protect the existing main centre in Kew*'. It is not clear what the exact intended meaning is of this (this should be clarified), nonetheless it could be interpreted as restricting the acceptable amount of convenience retail floorspace to no more than the existing. This approach would not be sound in our view.
- 5.29 Firstly, a restriction would not be in **general conformity** with the London Plan. London Plan Policy SD7 Part A(3) (as also firmly encouraged by London Plan Policy E9 (Part C(6)) and Policy H1) requires boroughs to realise the full potential of existing out-of-centre retail parks. As a starting point, SD7 supports the principle of replacement out-of-centre retail floorspace of up to the same quantum as the overall existing. Aside from the restriction on overall retail floorspace SD7 does not provide any restrictions on the redevelopment, replacement, or re-organisation of existing retail or leisure space – specifically it does not impose any restrictions on what type of goods the retail floorspace can be used for. It then confirms the acceptability of increasing the amount of retail at such sites where this can be justified by sequential and impact policy tests in accordance with the national planning policy approach to control such matters.
- 5.30 Secondly, the evidence set out in the Council's Retail Study Part 1 does not support a restriction on the amount of convenience retail floorspace at the site. A restrictive approach would require a clear and reasonable justification which is not provided in either the Phase 1 retail study and / or the draft Plan itself. In particular, it is briefly suggested that the proposed approach is to protect the health of town centres but no evidence is provided in order to demonstrate that the provision of replacement / net additional convenience goods floorspace at Kew Retail Park will lead to any harm to nearby defined 'town centres'. Accordingly, a restriction would not be **justified**.
- 5.31 This is in the context that policies should be positively worded.
- 5.32 As a final comment, we note that the allocation of Kew Retail Park is not the only site allocation to mention convenience goods floorspace in the draft Local Plan. The other references are in relation to a small number of 'town centre' allocations where a cap / limit / restriction has not been imposed.
- 5.33 Accordingly, in order to be **effective** (consistent with the rest of the Plan), **positively prepared** (meets the area's needs) and **justified** (based on evidence) we recommend that the policy is amended to remove any restrictions on the amount of convenience retail goods floorspace on the site as part of the replacement retail provision.

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## Sequential Test and Impact Assessment Requirements

- 5.34 For the reasons set out above, we recommend that the site allocation wording is amended to explicitly support the principle of substantial replacement retail development, including an increase in the amount of convenience goods floorspace in order to ensure the soundness of the policy.
- 5.35 We do not consider it necessary for the site allocation to define the acceptable amount of retail floorspace (in order for it to be sound) – rather this should be a matter dealt with at the planning application stage. With this approach it will be necessary to satisfy sequential and impact policy tests at the planning application stage in line with London Plan Policy SD7 and Local Plan Policy 18. Bearing in mind that the principle of substantial retail will have been established in the policy, the extent of the assessment work required to satisfy the policy tests should be proportionate.
- 5.36 In order for the policy to be effective (and cognisant of NPPF para 16d) we recommend that the policy (or supporting text) is amended to account for this.

## **5. Land Uses (Offices)**

- 5.37 The draft allocation requires the provision of offices (including the provision of affordable workspaces for small to medium sized companies). We consider this to be unsound on the basis that it is not **justified** by evidence nor **consistent with national policy**. It would also be inconsistent with other parts of the plan and therefore risks not being **effective**.

### Existing Use

- 5.38 The site does not currently accommodate any office (or other employment) uses. Accordingly, unlike retail uses (for example) the principle of such uses on the site has not been established, nor would redevelopment pose a risk of existing office/employment uses being lost.

### Evidence Base

- 5.39 The Employment Land and Premises Needs Assessment (2021) identifies a need for additional office and industrial use accommodation in the borough. It identifies a need for a minimum 40,000sqm of office accommodation over the plan period, however that there is a very limited pipeline supply of sites to meet this need.
- 5.40 It recommends that these needs can best be met via the intensification of the borough's existing employment sites and/or the repurposing of land/buildings within the borough's town centres (particularly Richmond town centre which is highlighted as a commercially attractive office location).
- 5.41 It also recommends that office supply is boosted 'wherever the opportunity presents itself. Kew Retail Park is referenced at paragraph 5.46 as a potential 'opportunity' for potential supply of offices in the context of town centre sites (which we note is not the case – it is an out-of-centre location).

### National Planning Policy/London Plan

- 5.42 In order to be sound, the recommendations of the aforementioned needs assessment should be applied in a manner that is in accordance with national planning policy and in general conformity with the London Plan.
- 5.43 Offices are defined as a Main Town Centre Use for the purposes of Annex 2 of the NPPF. NPPF paragraph 86 requires a range of suitable sites to be allocated in town centres to meet the scale and type development likely to be needed. Where suitable and viable town centre sites are not available for main town centre uses, appropriate edge-of-centre sites should be allocated followed by other

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accessible locations that are well connected to town centres. Consistent with this is London Plan Policy E1 which directs new office uses in Outer London to town centres and existing business parks.

#### Consistency with Other Draft Local Plan Policies

- 5.44 In order to be effective, there must be consistency between each policy in the new Local Plan in order that it can be read 'as a whole'.
- 5.45 In line with national/London Plan policy, Policies 23 directs 'major' new office development to town centres, with smaller scale office development directed to designated Key Business Areas and other 'suitable locations'. Similarly, Policy 21 directs other major employment development to town centres and designated employment sites, while only allowing 'other' (which we interpret as non-major – i.e. less than 1,000sqm floorspace) to be located elsewhere.

#### Soundness Issues with Current Draft

- 5.46 As currently drafted, the site allocation requires offices (including associated affordable workspace) to be provided on the Site. While we recognise that there is an identified need for office accommodation in the borough, the Site is not in a town centre nor in a designated employment area therefore allocating it for 'major' office development would not accord with national or London Plan policies nor would it be consistent with other policies in the draft plan. The broader policy basis would support 'minor' office uses on the Site which could form part of a range of small-scale complementary uses (see next section), nonetheless we consider that an express 'requirement' for offices (as currently drafted) would not be **justified, effective**, nor **consistent with national policy**.

### **6. Land Uses (Other Non-Residential Uses)**

- 5.47 In line with the overall approach of the policy as currently drafted, we support the inclusion of a range of small-scale other uses that would add to the vibrancy and vitality of the new community. The requirement as currently drafted is very specific (retail, café's and offices) which would prevent other perfectly acceptable other uses from coming forwards. In order to ensure the effectiveness of the policy we recommend that a more flexible approach is adopted to other uses as per the recommended amendments.

### **7. Land Uses (Public Open Space)**

- 5.48 The policy wording regarding the provision of public open space is not entirely consistent with Policy 37. In order for the plan as a whole to be effective, there must be consistency between policies. As per our recommended amendments, we suggest that detail is stripped out of the site allocation and replaced with a 'sign-post' to Policy 37.

### **8. Design**

#### Connections and Permeability

- 5.49 The site allocation calls for improving the permeability of the site by creating connections through to Kew Riverside and improving links to the River Thames. While we agree that this is desirable and would be a benefit to the scheme and the wider area, there are issues outside of the landowners' control that prevent direct options specifically along the eastern boundary. The Kew Riverside development is under private land ownership and the roads are not adopted by the local authority. There are also significant level changes along the eastern boundary where the level drops on the Kew Riverside side to allow for basement parking. This further restricts the potential of connecting the two sites.

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- 5.50 Therefore, creating new connections into Kew Riverside from the KRP site will be extremely challenging. There is potential to connect to the open space along the southern boundary which then allows access to the River Thames. We suggest that the policy is amended to state that new connections/permeability is provided 'where feasible' to ensure that it is properly justified and effective.

#### Public Space & Landscape

- 5.51 While 'tree lined avenues' may be typical of the area we feel that this is too prescriptive for the site allocation and may limit the landscape response to the site. We recommend that the policy is amended accordingly.

#### Building Heights

- 5.52 We welcome the requirement for development at Kew Retail Park and the wider area of Kew to improve and transform parts of East Kew through by improving the sense of place, public access and legibility. Based on our findings following a review of the Urban Design Study (2021), the Place-based Strategy for Kew is, however, unsound in its current form, as it is not supported by a sufficient evidence base to support specific building heights identified for the KRP site.
- 5.53 The prescribed building heights that form part of the policy are not sufficiently backed up by a robust evidence base in the Urban Design Study. We believe that a range of heights across the site would be more suitable. We will produce our own evidence to justify this as part of the preparation of the planning application for the site.
- 5.54 Please refer to our comments regarding the Urban Design Study and our representations to Policy 45.



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## 6. Policy 4 – Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency

- 6.1 Policy 4, as currently drafted, is not in accordance with national policy, not in general conformity with the London Plan, nor justified. We recommend that it is amended to fully conform with the London Plan which would make it sound, as explained below:

### Explanation

- 6.2 London Plan Policy SI 2 'Minimising greenhouse gas emissions' sets a carbon cash-in-lieu payment of £95/t, which is based on a nationally recognised non-traded price, that has been tested as part of the viability assessment for the London Plan which boroughs may use to collect offset payments.
- 6.3 The Greater London Authority guidance for London's Local Planning Authorities on establishing carbon offset funds (October 2018) requires that "LPAs should develop and publish a price for offsetting carbon based on either: a nationally recognised carbon pricing mechanism; or the cost of offsetting carbon emissions across the LPA. **The price set should not put an unreasonable burden on development and must enable schemes to remain viable.**"
- 6.4 The London Plan carbon offset price of £95 per tonne has been tested as part of the viability assessment (of the London Plan). This is intended to be the price LPAs adopt. Where following a 'cost of offsetting' route, the LPA should include an assessment of the carbon offsetting measures that are possible in the LPA, and dividing the average cost per tonne per year of these measures by the expected shortfall in emissions from the anticipated development coming forward over the next 30 years. An evidence base for the £300/t figure has not been provided (an 'Evidence Base for Carbon Emissions Reduction Policies' was provided in 2008).
- 6.5 Based on recent referable developments, carbon offset payments at the London Plan 2021 rate (£95/t) equates to an average offset payment of c. £20/sqm. With the proposed £300/t rate this would equate to c. £65/sqm. As a worked example, on a development of 20,000 sqm it is estimated that this would be an additional £1 million which will greatly affect a development's viability.
- 6.6 Policy 4 is based on a baseline of Approved Document Part L 2013 emissions, which will become superseded by National Policy changes to Approved Document Part L 2021, that addresses carbon emissions via a 31% betterment over Part L 2013 (domestic), and Approved Document Part L 2025 under the Future Homes Standard which will go even further to deliver an estimated 75% betterment over Part L 2013 (domestic). This will effectively surpass the proposed target of 60% for major developments, but allows for a gradual transitional period for the Construction Industry to adjust. Furthermore, the GLA are due to release a revised Energy Assessment Guidance (2022) to compliment the newly published Approved Document Part L 2021, which will address the improved carbon reduction target and how this should be assessed on schemes within London going forward.
- 6.7 National Planning Policy and London Plan both encourage maximising renewable provision, including solar PV, but do not set specific targets, as they recognise site and roof space constraints. By adhering to a robust review process in planning, this allows greater design flexibility than setting rigid targets.

### Recommended Amendments

- 6.8 In lieu of an appropriate evidence base for the £300/t offset figure, it is recommended that the GLA viability tested £95/t figure be kept, in accordance with the London Plan 2021.

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- 6.9 With the continual carbon reduction targets being imposed under the Future Homes Standard (31% under ADL 2021, and 75% under ADL 2025), and the anticipated update to the GLA Energy Assessment Guidance (2022), it is recommended that the Policy targets be amended to track London Plan 2021 targets, which shall develop in-sync with the Future Homes/Buildings Standard.
- 6.10 It is recommended that mandatory solar technologies target of 40% of the building footprint area be dropped, and the guidance in the London Plan 2021 and the anticipated Energy Assessment Guidance (2022) be adopted.

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## 7. Policy 6 – Sustainable Construction Standards

- 7.1 Policy 6, as currently drafted, is not in accordance with national policy, not in general conformity with the London Plan, nor justified. We explain this and set out recommended amendments to make the policy sound, below:

### Explanation

- 7.2 There is a considerable deviation from National Planning Policy and from the London Plan, neither of which require BREEAM or the voluntary Home Quality Mark standard. Key BREEAM credit philosophy has been embedded into the London Plan 2021 without specifically requiring certification, allowing greater design freedom. Home Quality Mark is a voluntary scheme, which was established so that house builders and developers could distinguish their properties and sustainability credentials. Mandating it will diminish this intent.
- 7.3 Policy does not take into consideration practical implications to 'Shell Only' and 'Shell & Core' BREEAM Assessments, which are considerably harder to achieve credits for due to the reduced number of available credits, therefore reducing design flexibility. Site constraints often make 'Outstanding' onerous to achieve, regardless of the Development design quality. This is particularly true for 'Shell Only' assessments where the scope only covers capped services. These assessments are likely to require an upgraded scope of works so that core services are fitted to enable improvements in efficiency. This will require efficient core services and renewable technology dedicated solely to the commercial areas.
- 7.4 BREEAM 'Outstanding' is a considerable uplift to the more common 'Excellent' rating, which requires BREEAM Assessor input from RIBA 0 which is often prior to consultant appointments. A BRE briefing paper 'The value of BREEAM' estimates an uplift in capital cost of 10% for retail and office building types. It is necessary that all pre-planning credits are targeted where possible and this will put additional pressure on planning stage budgets.
- 7.5 Key BREEAM Outstanding credits are often achieved on non-BREEAM Developments. BREEAM Outstanding represents a 66% carbon reduction over building regulations, which will be met from the Approved Document Part L 2021 and Approved Document Part L 2025 under the Future Homes Standard, in addition to the adoption of all-electric energy strategies. The Circular Economy and WLC requirements of London Plan 2021 surpass those of BREEAM Outstanding, successfully reducing waste, embodied carbon, and encouraging sustainable procurement methods. The London Plan also requires futureproofing through dynamic thermal overheating assessments following CIBSE TM52/59, and the prediction of operational energy performance through CIBSE TM54 which goes beyond the requirements of BREEAM Outstanding.
- 7.6 Approved Document Part L 2021 does not stipulate a specific FEES kWh/m<sup>2</sup>/yr target, but is instead informed by the Notional Building as defined by the SAP and SBEM methodologies. The targets under Policy 6 align closely with the London Energy Transformation Initiative (LETI) which is a voluntary standard and onerous to achieve.

### Recommended Amendments

- 7.7 London Plan 2021 targets BREEAM minimum performance for selected key credit criteria, such as energy and water, and surpasses BREEAM Outstanding for other key areas, such as the reduction in carbon emissions and prediction of operational energy performance, reduction in water consumption, embodied carbon benchmarks via Whole Life Cycle Carbon assessments, and the

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reduction of demolition and construction waste via Circular Economy Statement. It is therefore recommended that London Plan 2021 policies be targeted which shall cover the key BREEAM credits.

- 7.8 The Fabric Energy Efficiency Targets should be based on Building Regulation compliance in accordance with Approved Document Part L 2021 and the 2025 Future Homes Standard iteration, as this will be variable based on the design and Notional specifications used under the SAP and SBEM methodologies.



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## 8. Policy 10 – New Housing

### Recommended Amendments

#### Operating Period and the Housing Requirement

- 8.1 In accordance with NPPF para 22, it is necessary for soundness that strategic policies cover the full plan period, which in this case is 15 years (the period is confirmed at para 2.1 of the draft Local Plan). Policy 10 is confirmed (in its heading) as a 'Strategic Policy' but only covers a period of 10 years. As a starting point, we recommend that this is amended to cover the full 15-year period of the plan in order to be **consistent with national policy**.
- 8.2 In order to meet the overall housing requirement for the plan period as a whole, the 10 year housing target set by London Plan Policy H1 should be projected forward to cover the full 15 year period. Therefore we recommend that Policy 10 is amended to plan for a housing target of 6,165 homes in order to be **consistent with national policy** and in **general conformity with the London Plan**.

#### Exceeding the Housing Target

- 8.3 National planning policy (as expressed in NPPF para 60) is focussed on significantly boosting housing supply. London Plan Policy H1 sets minimum 'targets' for net housing completions which each local planning authority should plan for, and should be included in the Local Plan. The policy goes onto require boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites through their development plans (including through the mixed-use redevelopment of low-density retail parks).
- 8.4 Part A of the Policy 10 confirms that the Council will 'exceed the minimum strategic dwelling requirement' ..... 'where this can be achieved in accordance with other Local Plan policies'. It is our view that this qualification is unnecessary and over cautious and that the policy overall should adopt a much more positive and ambitious approach to significantly boosting housing supply in the borough and optimising sites in order to **accord with national policy** and be in **general conformity with the London Plan**. This view is justified by the supply of deliverable/developable sites set out in chapters 6-14 of the Plan which appear (on the basis of our review) to have capacity to exceed the minimum 15-year target set by the London Plan on the basis of the evidence set out in the Council's Urban Design Study (see below for further explanation).

#### Housing Trajectory

- 8.5 In order to be **consistent with national policy** (NPPF para 74), a housing trajectory should be prepared and included within the plan (to be read alongside Policy 10). This should be appropriately evidenced and consistent with the specific sites and broad locations for growth set out in Policy 10 itself and elsewhere in the Plan.

#### Broad Locations for Growth

- 8.6 NPPF para. 68 requires Local Plans to identify a supply of specific deliverable sites for years 1-5 of the plan period and specific developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. The draft Plan includes a series of place-based strategies with associated site allocations, each of which includes details of their expected implementation timescale (years 0-5, 5-10 or 10-15). We recommend amending these to years 1-5, 6-10, and 11-15 for the purposes of consistency with national policy.

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- 8.7 Part B of Policy 10 goes on to identify broad locations for growth based on wards. The use of wards is inconsistent with the place-based approach adopted by the first part of the plan. As a consequence it is not possible to effectively read/apply Policy 10 and the first part of the plan together (and therefore not possible to read the local plan 'as a whole') which is not in accordance with NPPF para 16(d). In order to be **effective**, the 'areas' referred to in Policy 10 should be amended to tally with the 'places' set out in Chapters 6-14 plan upon which the spatial strategy of the plan as a whole is based.
- 8.8 Part B sets out a quantum of housing for each broad location. These are described as 'indicative ranges' and 'approx.'). These terms are vague (not in accordance with NPPF para 16(d)) and do not firmly commit to delivering the minimum target set by London Plan Policy H1. To ensure **accordance with national policy** and **conformity with the London Plan** we recommend the figures stated should be 'targets' (with a clear intention to exceed – see below).
- 8.9 In order to **accord with national policy** (NPPF para. 68), the 'target' amounts of new housing for each broad location set out in the table at Part B should be amended in order that they tally with the minimum 10-year housing target, and where possible the 15-year target. Our initial view is that the proposed site allocations set out in the draft plan indicate that the borough has an ample supply of specific deliverable/ developable sites to meet the 15-year housing target therefore we recommend that the amounts set out in the table at Part B of the Policy should cover the full 15-year period in order to accord with national policy and ensure soundness.
- 8.10 No explanation is provided in the draft policy of how the actual amounts set for each location in the table have been calculated, therefore these are not clearly justified by evidence. Our review indicates that some of the figures may be under-ambitious when considered in conjunction with the proposed site allocations and recent planning permissions. If this is the case, it would fail to accord with the national policy requirement to significantly boost housing supply nor conform with the London Plan requirement to optimise sites. To ensure soundness (**justified**), the figures should be clearly evidenced and revised accordingly to reflect the evidence.
- 8.11 To highlight this point, an indicative/approximate range of 1,100-1,200 homes has been identified for the 'Richmond' area. There are 6 sites allocated within this area with a total site area of 8.77ha. The optimum capacity of two of these sites (Kew Biothane and Homebase) has been confirmed via planning applications, with a combined capacity of 542 homes (average density of 214 dwellings per hectare (dph)). This leaves an 'indicative' balance of 558-658 homes for the remaining 4 allocated sites which would equate to an average density of 63-75dph. These density figures appear unrealistically low when considered in conjunction with the evidence set out in the Urban Design Study (2021) including the sites' capacity for change and suitability for tall buildings. Refer to Table 8.1, below:

Table 8.1 Review of Proposed Site Allocations in 'Richmond' Area

Site	Site Area	Site Capacity
Homebase Manor Road	1.84ha	453 homes (planning application ref. 19/0510 – approved by Mayor)
Kew Biothane	0.69ha	89 homes (planning permission ref. 18/3310)
<b>Sub-total (known site capacity)</b>	<b>2.53ha</b>	<b>Actual capacity: 542 homes</b> Average density = 214 dwellings per hectare
Richmond Station	1.96ha	Unknown Identified in UDS as tall building zone with appropriate building heights of 7-8 storeys
Richmond Telephone Exchange	0.27ha	Unknown
Sainsbury's, Lower Richmond Road	2.63ha	Unknown Identified in UDS as tall building zone with appropriate building heights of 7-8 storeys
Kew Retail Park	3.91ha	Unknown Identified in UDS as tall building zone with appropriate building heights of 7 storeys
<b>Sub-total (unknown site capacity)</b>	<b>8.77ha</b>	<b>Indicative range (draft Policy 10): 558-658 homes</b> Average density = 63-75 dwellings per hectare

8.12 In accordance with the above, our view is that the 'approx. no. of units' figures set out in Part B of Policy 10 appear too low (including specifically for the Richmond area) and should be increased to more accurately reflect the optimum capacity of sites within each area in order to be properly **justified**. The figures should be underpinned by evidence – SG and M&S propose to work with the Council to prepare the necessary evidence to determine the optimum capacity of the KRP site over the course of 2022 in advance of the preparation of the Regulation 19 draft.

## 9. Policy 11 – Affordable Housing

### Definition of Affordable Housing

~~Annex 2 of the NPPF defines Affordable Housing for planning purposes. Genuinely Affordable Housing.~~ The Council considers the following ~~to be~~ genuinely affordable housing products ~~to be as per the definition set out in London Plan Policy H4:~~

- ~~— Social Rent~~
- ~~— London Affordable Rent~~
- ~~— London Living Rent (only when delivered in compliance with the Council's Intermediate Housing Policy Statement 2019 or any further update.)~~
- ~~— Shared Ownership (only when delivered in compliance with the Council's Intermediate Housing Policy Statement 2019 or any further update.)~~

### Policy

- A. ~~All new housing developments in the borough should provide affordable housing in accordance with London Plan Policies H4 to H6, at least 50 per cent of the total number of habitable rooms as affordable housing on site. The affordable housing being provided should be genuinely affordable for the majority of residents in the borough.~~
- B. ~~A contribution towards affordable housing will be expected on all housing sites. The following requirements apply:~~
- C. ~~on all former employment sites at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.~~
- D. ~~on all other sites capable of ten or more units gross 50% on site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.~~
- ~~on sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out below and in the Affordable Housing SPD~~
- C. Where on site provision is required, an application should be accompanied by evidence of meaningful discussions with a Registered Provider which have informed the proposed tenure, size of units and design to address local priorities and explored funding opportunities.
- D. Where ~~on-site~~ affordable housing is provided on site, the Council will require an affordable housing tenure split of 70% ~~low-cost rented homes affordable rented housing~~ and 30% intermediate housing (~~as per London Plan definitions~~) by habitable room. ~~The intermediate housing will be delivered in line with the Council's Intermediate Housing Policy Statement.~~
- E. ~~If the minimum level of affordable housing is not provided in line with Part B (1) and B(2) the application for development will be refused.~~
- F. ~~Site specific viability information will only be accepted in exceptional cases, determined by the Council. Any proposals where site specific viability evidence is accepted must provide the maximum amount of affordable housing, informed by detailed viability evidence. The cost of any independent review must be covered by the applicant.~~
- G. ~~If a site proposes a non-compliant level of affordable housing and is granted permission it will be subject to detailed review mechanisms throughout the period up to full completion of the development, including an advanced stage review mechanism. Sites that meet the 50% target for affordable housing will not be subject to a late stage review, only an early stage review to incentivise implementation.~~
- H. In exceptional circumstances, where affordable housing cannot practically be provided on site, or off-site provision would create a better contribution (in terms of quantity and/or quality), the Council may accept provision of affordable housing off-site in the same area.



- I. Developments involving the provision of affordable housing will be expected to achieve the same high quality standards as the private housing element of the scheme in terms of accessibility, internal space requirements, external appearance and design quality and provision of private outdoor space.
- J. The Council will not accept the net loss of any existing affordable housing and will expect any estate regeneration to provide the equivalent amount of affordable housing by habitable room, and where possible, achieve an uplift in provision.

## Explanation/Justification

### Definitions

- 9.1 The definition of affordable housing set out in the orange box after para 17.11 is muddled which means it is not **effective** and not in accordance with NPPF para 16(d). There are two separate matters here: (1) a definition of affordable housing; and (2) a definition of what the Council considers to be 'genuinely' affordable housing.

#### *Definition of Affordable Housing*

- 9.2 'Affordable Housing' for planning purposes is defined at NPPF Annex 2. This is reiterated at footnote 53 of the London Plan. The definition set out in the orange box is not consistent with this and therefore is not in **accordance with national planning policy** nor in **general conformity** with the London Plan. We recommend that the text should be amended in order that it is based on the NPPF definition (there is no need to duplicate – a cross reference will suffice).

#### *Definition of 'Genuinely Affordable Housing'*

- 9.3 NPPF para. 63 allows the Local Plan to specify the 'type' of affordable housing required within the parameters of the definition provided at Annex 2. Accordingly, the orange box after para 17.11 provides a definition of what the Council considers to be 'genuinely' affordable housing, which comprises 4 acceptable types of affordable housing required by the policy. Part A of the policy introduces a further qualifying requirement that the affordable housing provided should be genuinely affordable for the 'majority of residents in the borough'. The supporting text at paragraph 17.18 goes on to provide a broader explanation which is not consistent with the orange box nor the policy wording, including the statement that 'genuinely affordable housing is primarily considered to be homes rented at either social rent or London Affordable Rent levels' (only). When read as a whole, the definition is not properly justified nor clear therefore is not in **accordance with national planning policy** nor **in conformity with the London Plan**.
- 9.4 The London Plan identifies 'preferred' affordable tenures at para 4.6.3-9, which are products that the Mayor considers to be genuinely affordable. This comprises London Affordable Rent (LAR), Social Rent (SR), London Living Rent (LLR), and London Shared Ownership (LSO). As a starting point, the type of affordable housing required by the policy (i.e. that identified as being 'genuinely affordable') should conform with the preferred affordable housing tenures set out in the London Plan.
- 9.5 The inclusion of Social Rent and London Affordable Rent (LAR) within the definition in the orange box conforms with the London Plan and is sound in principle. However, to ensure effectiveness and having regard to NPPF para 16(d) we recommend that the supporting text refers to the London Plan definitions for these products. Paragraph 17.18 deviates from the orange box by stating that LAR is only acceptable if evidence is provided that it will be affordable to the majority of residents living in

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the borough. This qualifier is not in conformity with the London Plan (which establishes as a matter of established planning principle that LAR is a genuinely affordable product) and therefore is unsound.

- 9.6 The supporting text at paragraph 17.18 states that ‘In the context of the Local Plan, genuinely affordable housing is primarily considered to be homes rented at either social rent or London Affordable Rent levels’. This is not sound on the basis of non-conformity with the London Plan which establishes the principle that LLR and LSO products also meet the definition of genuinely affordable.
- 9.7 The intermediate products (LLR and Shared Ownership) included within the definition in the orange box are not sound on procedural terms and on the grounds of non-conformity with the London Plan. This is principally due to the qualification: ‘only when delivered in compliance with the Council’s Intermediate Housing Policy Statement 2019 or any further update’ (this also applies to Part D of the policy).
- The Local Plan must be capable of operating as a standalone document (with the exception of making reference to the NPPF and/or London Plan). It follows that it is not capable of being sound if its policies are subject to materially significant content set out in a separate existing statement that does not form part of the development plan (or Government policy) and therefore has not been subject to independent examination to ensure its soundness.
  - The Council’s Intermediate Housing Policy Statement (2019) does not form part of the Council’s evidence base being consulted on (as part of the Regulation 18 consultation) nor was it available for public download from the Council’s website during the reg.18 consultation period. Accordingly, and notwithstanding the above point, it is not possible to for the public to reach a judgement on whether its content is sound or not.
- 9.8 There is no definition for the ‘Shared Ownership’ product. We recommend that this is amended to ‘LSO’ with reference made to the London Plan for LSO and LLR definitions.
- 9.9 The relevant evidence that is currently available comprises the Richmond Local Housing Market Assessment (2021), however this does not justify deviating from the London Plan and/or national policy in respect to the soundness issues set out above. Accordingly, in order to make the plan sound we recommend amending the orange box, the policy wording, and paragraph 17.18 in order that the definitions of ‘affordable housing’ and ‘genuinely affordable housing’ are in full conformity with the London Plan. There is no need to duplicate text, amending the wording to simply cross-refer to the London Plan will suffice to make the plan sound.

#### 50% Minimum Affordable Housing Requirement

- 9.10 The combined requirement of Parts A, B(1) and B(2) of the policy require a minimum 50% affordable housing to be provided.
- 9.11 As a starting point, NPPF para 62 establishes the principle that affordable housing needs should be reflected in Local Plan policies. The London Plan sets a strategic target that 50% of all new homes across London should be affordable, with affordable housing provided through the threshold approach (Policies H4 and H5).
- 9.12 NPPF para 16(b) requires local plans to be deliverable. Satisfying this requirement in the context of setting affordable housing policies is dependent on evidence set out in a Whole Plan Viability Assessment. The Viability PPG states that: ‘The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.’ 002 Reference ID: 10-002-20190509

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- 9.13 As confirmed in the supporting text to the policy, the Council has not yet undertaken a Whole Plan Viability Assessment. Accordingly there is no evidence base to confirm whether the 50% requirement is viable (and therefore deliverable) and it is therefore fundamentally unsound (**not positively prepared, not justified, not effective, and not consistent with national policy**).
- 9.14 The plan can be made sound through the preparation of a Whole Plan Viability Assessment and subsequent amendments to accord with its conclusions. Until and unless such evidence is prepared that justifies deviating from the threshold approach set out in the London Plan, we recommend that the policy should be amended to fully conform with the London Plan.

#### Whole Plan Viability Assessment

- 9.15 In order to provide a robust evidence base to underpin the policy it is essential that the Whole Plan Viability Assessment fully accounts for the broad range of site-specific considerations that effect the viability of development in the borough. This is particularly important for the proposed site allocations, upon which the deliverability of the plan rests.
- 9.16 To illustrate the point, Kew Retail Park is not a 'typical' site typology as it is a successful retail destination with an inherently high existing use value. This means that viability is going to be more challenged here than on other brownfield sites where commercial uses may be redundant and/or existing use values lower.
- 9.17 Subject to the findings of the evidence, it may well be necessary for the policy to set different affordable housing targets at different locations and sites, as supported by the Viability PPG: 'Different requirements may be set for different types or location of site or types of development.' Paragraph: 001 Reference ID: 10-001-20190509. This is consistent with London Plan Policy H4 which recognises that the 50% target is a strategic London wide target that will not be achievable in all cases, particularly if additional funding is not available.

#### The Threshold Approach

- 9.18 The threshold approach was introduced in supplementary planning guidance by the Mayor in 2017 as a solution to address the failings of past policy approaches which have failed to deliver adequate levels of affordable housing to meet the needs of Londoners. The guidance was subsequently established as policy in the new London Plan. Evidence indicates that the shift to the threshold approach has been effective, with the average proportion of affordable housing secured under new planning permissions granted increasing significantly since the approach was introduced. Table 9.1, below, sets out the proportion of affordable housing provided within GLA referable applications (resolution to grant or approved) across London over the period 2011-2020. This demonstrates a clear increase in affordable housing commitments secured following the introduction of the threshold approach in 2017.

Table 9.1 – Affordable Housing Commitments (all London) 2011-20

Year	Total Homes	Affordable Homes	% Affordable
2011	29,120	6,900	24%
2012	52,932	13,068	25%
2013	40,058	9,863	25%
2014	44,982	10,026	22%
2015	53,425	13,929	26%
2016	34,807	8,606	25%
2017	23,784	6,188	26%
2018	42,762	14,141	33%
2019	29,631	10,935	37%
2020	38,865	14,337	37%
<b>Total</b>	<b>390,366</b>	<b>107,993</b>	<b>27.7%</b>

Source: Affordable Housing Planning Analysis Referable Applications, GLA, 2021

- 9.19 The current Richmond Local Plan requires 50% of all housing units to be affordable. Table 9.2, below, sets out the proportion of affordable housing that this policy approach has historically delivered:

Table 9.2 – Affordable Housing Completions (LBRuT) (2010/11 to 2019/20)

Year	Total Homes	Affordable Homes	% Affordable
2010/11	399	126	32%
2011/12	208	75	36%
2012/13	695	227	33%
2013/14	235	33	14%
2014/15	304	6	2%
2015/16	491	99	20%
2016/17	460	62	13%
2017/18	382	41	11%
2018/19	419	70	17%
2019/20	331	34	10%
<b>Total</b>	<b>3,924</b>	<b>773</b>	<b>19.7%</b>

Source: London Borough of Richmond upon Thames Local Plan Authority Monitoring Report – Housing (2020)

- 9.20 The data set out in the above table demonstrates that in practice the policy approach set out in the current local plan has not delivered the amount or proportion of affordable homes that it intended. The need to increase the actual and proportional amount of affordable housing in the borough is highlighted in the Local Housing Market Assessment (2021) and reflected in the ambition of the draft new local plan policy. However, we are concerned that despite the evidenced success of the Mayor’s threshold approach in increasing affordable housing supply across London, the supporting text of the draft Local Plan (para 17.20) dismisses this as a mechanism to boost affordable housing supply in the borough, and instead proposes to continue with the previous policy approach of a 50% requirement which, despite best intentions, hasn’t been effective in the past.
- 9.21 The historic trend-based evidence firmly indicates that 50% affordable housing is unlikely to be deliverable and the Local Housing Market Assessment (2021) does not justify continuing with the



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current approach. Accordingly, we consider there to be no justification for deviating from the threshold approach set out in the London Plan.

- 9.22 Furthermore, setting an absolute 50% affordable housing target poses a risk to total new housing delivery in the borough as developers will focus upon areas where the threshold approach is valid and reasonable viability cases can be made.
- 9.23 On this basis, we consider the overall approach of the policy to be unsound on the grounds of non-conformity with the London Plan. It can be made sound by amending the policy to fully conform with London Plan Policy H5.

#### Application Stage Viability

- 9.24 In addition to the in-principle soundness issue regarding the threshold approach (as set out above) there are a number of further soundness issues with the proposed approach to the matter of viability at the planning application stage.
- 9.25 Part E states that if the minimum level of affordable housing is not provided the application will be refused. When read in isolation this allows no opportunity for a viability case to be progressed. This is inconsistent with Parts F and G of the policy and therefore is not in accordance with NPPF para 16(d). This point could be rectified by amending the text to add 'subject to Parts F and G'.
- 9.26 Part F states that site specific viability information will only be accepted in exceptional circumstances. The supporting text (including para. 17.22) goes on to state that viability arguments will only be accepted in extraordinary circumstances. This is clearly not in general conformity with London Plan threshold approach and Policies H4-6 and, in the absence of evidence to robustly justify non-conformity, is not sound.

#### Viability Reviews

- 9.27 The requirements of Part G of the policy are not entirely consistent with London Plan Policy H5 which risks creating confusion for applicants and decision-makers, and conflicts with NPPF para 16(d). We recommend that it is amended to fully conform with London Plan Policy H5 to ensure soundness.

#### Provision to be Informed by Meaningful Discussions with RPs

- 9.28 The Viability PPG states that plan makers should engage with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage.
- 9.29 This exercise should therefore be taken at the Plan making stage by the Council to inform the area wide viability assessment. The RPs requirements may not be in alignment with the Council's currently stated targets and there may not be appropriate demand from RPs for the tenures and split indicated. It is not disputed that engagement with RPs is desirable at an early stage but this can only be effective if there is flexibility within the affordable housing policies for both developer's and RPs to respond to housing need and viability constraints on different sites across the Borough.

#### 70:30 Ratio for Affordable Rented and Intermediate Housing

- 9.30 The proposed 70:30 split accords with the parameters set by London Plan Policy H6, however in the absence of a Whole Plan Viability Appraisal there is no evidence to confirm whether this is viable (deliverable). It is therefore unsound. The necessary evidence will need to be prepared and the policy updated to reflect its conclusions in order to ensure soundness.

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9.31 Paragraph 4.6.2 in support of Policy H6 of the London Plan states that: There is a presumption that the 40 per cent to be decided by the borough will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London. However, it is recognised that for some boroughs a broader mix of affordable housing tenures will be more appropriate either because of viability constraints or because they would deliver a more mixed and inclusive community. The appropriate tenure split should be determined through the Development Plan process or through supplementary guidance.

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## 10. Policy 12 – Housing Needs of Different Groups

### Recommended Amendments and Explanation

- 10.1 The wording in Parts A and B of the policy indicates that the policy applies to proposals for new 'housing' and/or 'accommodation'. Neither term is defined and the initial paragraphs of the supporting text implies that the policy applies to specialist forms of housing only. On the whole it is not clear. This is not sound having regard to NPPF para 16(d) (**accordance with national policy**). We recommend that the policy is amended to make it explicitly clear what type of residential development it applies to.
- 10.2 Part B of the policy states that 'a legal agreement will be necessary to secure the nature of provision and any necessary future control in terms of eligibility and affordability for future occupiers'. The use of planning obligations is controlled by Regulation 122(2) of the Community Infrastructure Levy Regulations, with the relevant tests reiterated at NPPF paragraph 57. Whether or not a planning obligation can justifiably be sought for the nature of provision and/or control the eligibility and affordability of future occupiers will need to be judged on a case-by-case basis having regard to these tests. A blanket mandatory policy requirement that applies to all residential development would not satisfy these tests and therefore would **not be in accordance with national policy**, and therefore not sound. We recommend that the text is amended to replace 'will be necessary' with 'may be necessary' to resolve this.
- 10.3 Part B(1) duplicates Policy 11 which is unnecessary in the context of NPPF para 16(f) (**not in accordance with national policy**). We recommend that this is deleted.
- 10.4 Part B(2) requires proposals to demonstrate how 'higher' standards of accessible and inclusive design have been met. The term 'higher' is not defined therefore the requirement of the policy is not clear. This is not sound having regard to NPPF para 16(d) (**not in accordance with national policy**). We recommend that the policy is amended to make it explicitly clear what standards of accessible and inclusive design are required. We note that the required standards would need to accord with NPPF para. 35, and we reserve the opportunity to make further representations on this matter at the Regulations 19 stage.

# 11. Policy 13 – Housing Mix and Standards

## Recommended Amendments

A. Development should generally provide a mix of sizes and types of accommodation. Areas within PTALs 3-6 or within 800m distance of a station or town centre boundary should provide a higher proportion of small units (studios and 1 beds). For market housing, there is highest demand for 2 and 3 beds. The affordable housing mix should be based on discussions with a Registered Provider(s) to reflect local needs, in accordance with Policy 11 Affordable Housing. The housing mix should be appropriate to the site-specifics of the location.

B. All new housing development, including conversions, are required to comply with the Nationally Described Space Standard. As also set out in London Plan Policy D6 on private internal space, the minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling. New homes significantly above the minimum NDSS standard that do not make efficient use of land will be resisted.

C. All new housing development, including conversions, should provide adequate private amenity external space. Purpose built, well designed and positioned balconies, winter gardens or terraces are encouraged where new residential units are on upper floors, if they comply with Policy 46 Amenity and Living Conditions. Regard should be had to the Council's Residential Development Standards SPD as appropriate.

D. Private Amenity space for all new dwellings, including conversions, should be:

1. private, usable, functional and safe;
2. easily accessible from living areas or bedrooms where appropriate;
3. orientated to take account of need for sunlight and shading where feasible;
4. in line with London Plan minimum standards for private amenity space of a sufficient size to meet the needs of the likely number of occupiers; and
5. accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space.

E. At least 10% of all new build housing (via works to which Approved Document M (ADM) Volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings' and all other new build housing (created via works to which Part M volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings', in accordance with London Plan Policy D7. Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement as set out in London Plan Policy D5 to demonstrate how the highest standards of accessible and inclusive design have been achieved.

## Explanation/Justification

- 11.1 As currently drafted, there are some minor issues regarding the likely effectiveness of the policy, as set out below:
- Section B of the policy should clarify that the 'standard' referred to in the policy is the NDSS standard to avoid misunderstanding.
  - Section C should make clear that reference is being made to private amenity space and that winter gardens can be an appropriate form of amenity on constrained sites. Winter gardens are a



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common feature across a number of London schemes and can help overcome issues of noise and air pollution on constrained sites.

- Section D should make clear that this is in reference to Private Amenity. It is sometimes appropriate and/or necessary to have the amenity space accessed from the main bedroom. This is common in some one-bedroom apartments and the policy should not restrict this. Point D.4 should make it clear that it is the London Plan minimum standards that should be achieved for private amenity space.

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## 12. Policy 17 – Supporting our Centres

### Recommended Amendments

- 12.1 Based upon the explanation and justification below, the following amendments are recommended to ensure the soundness of draft Policy 17:
- Part A of the draft policy should be amended to include reference to major retail and leisure development also being directed towards allocations in the Local Plan (otherwise Policy 17 does not properly and accurately describe the retail and leisure development strategy in the Borough).
  - Amend paragraphs 6.181 to 6.185 to reflect the following:
    - o The supporting text should be updated to reflect the preparation of a new retail study, which renders the current content paragraphs 6.181 – 6.184 out of date and inaccurate.
    - o remove the theoretical assumption in 6.182 that all new town centre uses could be accommodated in vacant shop units.
    - o whilst it may be the case, as stated in 6.183, that re-purposing existing retail floorspace has a genuine part to play in retail development strategy for the Borough, this does not mean that there is no requirement to allocate sites for major retail development (as allocations may be designed to redevelop existing floorspace to meet identified needs).

### Explanation/Justification

- 12.2 Draft Policy 17 provides a straight-forward and logical approach to the defined 'town centres' across the Borough. It emphasises support for locating a range of land uses within the defined 'town centres', which is in line with national policy and thus should be supported.
- 12.3 The decision to define **the centre hierarchy** after 6.174 is also supported, as it provides clarity to the Local Plan strategy. However, we would urge the Council to make amendments and additions to this section, in the interests of clarify, for two main reasons.
- 12.4 First, the Local Plan should be clear over which locations in the table after 6.174 should be classified as 'town centres' for the purposes of applying development management policies such as the sequential and impact tests. The Glossary to the NPPF notes that:
- "References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance".*
- 12.5 Therefore, in light of this clear national policy, the Council is required to determine and justify which centres are capable of meeting the definition of a 'town centre' and this will require an assessment of the scale, role, catchment and function. Without this clarity, the Local Plan is failing to meet national policy.
- 12.6 Second, the Local Plan should define the role and function of the various tiers of centre in the formal 'town centre' hierarchy. This is required for clarity and to explain the role of 'town centres' in the Borough, including their key characteristics, role and function. It is also required to assist with the operation of the sequential and impact tests, particularly the choice of which centres should be considered as potential realistic alternative locations for main town centre land use proposals.
- 12.7 On a separate matter, whilst it is reasonable for the main 'town centres' policy to refer to the contents of **the evidence base**, the content of paragraphs 6.181 to 6.184 will need to be re-visited and updated in the next draft of the Local Plan in light of the decision by the Council to undertake a further retail study for the Borough. Indeed, if Policy 17 intends to rely upon the evidence base to support the development strategy therein then the evidence base must tackle the issues / topics in

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question and provide a reasoned and robust analysis. At the present time, the retail floorspace forecasts quotes in this part of the supporting text are based upon evidence data which is either already out of date (due to the age of the household survey) or will soon become out of date due to the publication of new economic forecasts by Experian in late January 2022. Moreover, if the policy is based, in part, on using vacant floorspace to meet identified needs then the land use surveys should be updated given the on-going effects of the COVID-19 pandemic.

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## 13. Policy 18 – Development in Centres

### Recommended Amendments and Explanation

#### Part B – Defining Frontages and Boundaries

- 13.1 At the present time, the draft Local Plan refers to **key and secondary frontages** in part B of draft Policy 18 and provides a detailed description of these areas in Appendix 1 of the document. It is, however, important that the defined boundaries conform to the requirements of national planning policy and guidance.
- 13.2 Whilst all local authorities are now required to deal with the recent changes to the use classes order and permitted development rights, NPPF paragraph 86(b) continues to require planning policies to define the extent of town centres and primary shopping areas. Not only is it required for the new Richmond Local Plan to ensure conformity with national planning policy but it will also assist in the operation of the sequential test for future main town centre land use proposals<sup>1</sup>. This should be clarified in the new version of the Local Plan.
- 13.3 In addition, it is to be noted that the latest version of the NPPF removes the formal requirement to define primary and secondary frontages. This is, no doubt, a reflection of the changing nature of town centres and an acknowledgement by central government that retail uses<sup>2</sup> are no longer the central pillar to the health of centres. It also conforms with the introduction of Use Class E.
- 13.4 The PPG does still refer to primary and secondary frontages:

*“Authorities may, where appropriate, also wish to define primary and secondary retail frontages where their use can be justified in supporting the vitality and viability of particular centres”.*

- 13.5 However, if it is clear that a clear justification should be provided. Therefore, we would expect the new Local Plan to provide town centre and primary shopping area boundaries and only defined frontages where they can be justified in their own right (in the face of the parameters of Use Class E) and be accompanied by sound development management policies which are required and effective.

#### Part C – High Trip Generating Development

- 13.6 Part C of the policy requires major development that generates high levels of trips to be located within a town centre boundary. This is not consistent with other parts of the plan (notably the site allocation for Kew Retail Park) and therefore is **not in accordance with national policy** (NPPF para 16(d)). This can be resolved by amending the text to ‘.....should be located within a town centre boundary or as per site specific allocations’.

#### Part F – Out-of-Centre Retail Development

- 13.7 Part F of the policy states that ‘out of centre development is not considered appropriate in line with the London Plan’. This is not in general conformity with the London Plan (and therefore **not in accordance with national policy**). The London Plan does not state that out-of-centre development is inappropriate. In line with national planning policy, London Plan Policy SD7 (Part A) requires

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<sup>1</sup> The Council will no doubt be aware of the sequence of preferred locations for main town centre land uses, including: in-centre; edge-of-centre; and out-of-centre. The Glossary in the NPPF notes that: “For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances”.

<sup>2</sup> former Class A1



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boroughs to take a town centres first approach. While in most instances this 'discourages' out-of-centre development, it does not preclude it.

- 13.8 The principal exception supported by London Plan Policy SD7 Part A(3) (as also firmly encouraged by London Plan Policy E9 (Part C(6)) and Policy H1) is the requirement for boroughs to realise the full potential of existing out-of-centre retail parks to deliver housing intensification through development, where this does not result in a net increase in retail floorspace unless this is in accordance with the development plan or can be justified through the sequential test and impact assessment policy requirements. In practice this supports the principle of replacement out-of-centre retail development.
- 13.9 In order for the policy to be sound, we recommend that the policy wording is amended to state that 'out of centre development is not considered appropriate except where this involves the replacement of existing out-of-centre development and/or is in accordance with site allocations'.

#### Part F – Sequential Test and Impact Assessment Requirements

- 13.10 Amendments are required in relation to the approach to main town centre land use proposals in Part F. This part of draft Policy 18 is the only part of the draft Local Plan which refers to the sequential test for main town centre uses and impact assessments for retail and leisure. It is currently unsound and ineffective and requires the following amendments:
- 13.11 With regards to the sequential test, it is entitled to refer to national policy and guidance in relation to the specifics of any assessment although the following should be incorporated into the policy and supporting text:
- The policy should make it clear that, in principle, it relates to proposed main town centres in certain circumstances.
  - The policy is not, however, in conformity with national policy as the sequential test applies to proposals for main town centre uses located outside of defined centres and not in accordance with an up to date development plan. This latter point needs to be included in Policy 18 in order that it reflects national policy in general and also the decision to allocate sites for retail development such as Kew Retail Park. The allocation of Kew Retail Park is a result of a number of factors, but in relation to retail land use provision it is acknowledged to be an established retail destination whose redevelopment can make a positive contribution to the development strategy for Richmond. Therefore, the sequential test should not apply to proposals at Kew Retail Park (or any other retail allocation) in the same way as other unallocated out of centre retail / main town centre land use proposals. This should be reflected in both Policy 18 and the site allocation policy.
- 13.12 Similar inconsistencies occur in the draft Local Plan in relation to the impact test. In particular, the policy requires amendment in order to reflect the provisions of the NPPF and London Plan Policy SD7 which do not require an impact assessment for proposals in accordance with a development plan. It is, of course, acknowledged that some development plan policies / allocations may not be specific about the exact scale and nature of floorspace and there a proportionate impact assessment may be appropriate (tailored to the circumstances of each site / allocation).

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## 14. Policy 28 – Local Character and Design Quality

### Recommended Amendments and Explanation

14.1 Policy 28 supports the introduction of high-quality architecture and urban design. Whilst the drafting of the policy is generally supported, Part B of the policy is unsound.

14.2 We recommend the following amendment to Part B to make the policy sound:

‘To ensure development respects, contributes to and (where appropriate) enhances the local environment and character, proposals must reflect and demonstrate the following principles’.

## 15. Policy 29 – Designated Heritage Assets

### Recommended Amendments (tracked changes to Reg.18 draft text)

A. The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to cause harm to a designated heritage asset would require clear and convincing justification and should be weighed against the public benefits of the proposal.~~adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal.~~ The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced by the following means:

1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset.
2. ~~Resist the demolition in whole, or in part, of listed building.~~ Consent for demolition of Grade II listed buildings will only be granted in exceptional circumstances and for Grade II\* and Grade I listed buildings in wholly exceptional circumstances following a thorough assessment of the justification for the proposal and the significance of the asset. Careful and sensitive maintenance, management and reuse of heritage assets also saves embodied carbon and avoids the carbon dioxide of constructing new buildings.
3. Resist the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place.
4. ~~Require the retention and preservation of the original structure, layout, architectural features, materials as well as later features of interest within listed buildings, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset.~~
5. Demolitions (in whole or in part), alterations, extensions and any other modifications to listed buildings should be based on proportionate~~an accurate~~ understanding of the significance of the heritage asset.
6. ~~Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within listed buildings, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development.~~
7. Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists.
8. Proposals that affect the borough's Registered Parks and Gardens should conserve their significance. Where proposals may cause harm to that significance, that harm should require clear and convincing justification and be outweighed by public benefits.~~Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.~~
9. Proposals that affect the borough's Scheduled Ancient Monuments should conserve their significance. Where proposals may cause harm to that significance, that harm should require clear and convincing justification and be outweighed by public benefits.~~Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.~~

**Continued on following page**

**Cont.**

B. Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.

1. in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;

2. in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or

3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.

C. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.

D. Where there is evidence of intentional damage or deliberate neglect to a designated heritage asset, its current condition will not be taken into account in the decision-making process.

E. ~~Outline planning applications will not be accepted in Conservation Areas.~~ The Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans, will be used as a basis for assessing development proposals within, or where it would affect the setting of, Conservation Areas, together with other policy guidance, such as Village Planning Guidance SPDs.

F. Sympathetic measures to make energy and carbon savings in historic and listed buildings are encouraged, by adopting a 'whole house approach' and understanding all the factors that affect energy use. Any potential damages to the structure or heritage value, or impacting the setting of, historic buildings have to be avoided.

### **Explanation/Justification**

- 15.1 We consider the drafting of Policy 29 to be unsound. Paragraphs 201 & 202 of the NPPF (2021) state that where a proposed development will cause harm to a designated heritage asset (whether that be substantial or less-than-substantial), clear and convincing justification is required in order to demonstrate that such harm is outweighed by the public benefits of a development proposal. As currently drafted, Policy 28 is not compliant with national planning policy.
- 15.2 3.5 Parts A.4, A.6 A.8 and A.9 are considered too specific, particularly in reference to the requirement to retain and preserve original structures, layouts and architectural features. There is no requirement to, in national planning policy or the London Plan 2021, to reinstate historic features, not least in cases of buildings of multiple periods, as it may not be appropriate to reinstate features of a particular phase of a building's history.



---

## 16. Policy 30 – Non-designated Heritage Assets

### Recommended Amendments (tracked changes to Reg.18 draft text)

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm of loss and the significance of the heritage asset.

~~A. The Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, locally listed historic parks and gardens and other local historic features.~~

~~B. There will be a presumption against the demolition of Buildings of Townscape Merit.~~

### Explanation/Justification

- 16.1 As currently drafted, Policy 30 is not consistent with national policy set out in NPPF (2021), which requires the effect of an application on the significance of a non-designated heritage asset to be taken into account in determining applications. There is no requirement in national legislation or policy to preserve or enhance the significance of non-designated heritage assets.

## 17. Policy 31 – Views and Vistas

### Recommended Amendments (tracked changes to Reg.18 draft text)

A. The Council will protect the quality of the identified views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means:

1. protect the quality of the views and vistas as identified on the Policies Map, and for any proposal affecting a designated/identified view/vista on the Policies Map demonstrate this through the submission of such through computer-generated imagery (CGI) and visual impact assessments as required by Policy 44 Design process;
2. ~~require clear and convincing justification for~~ ~~resist~~ development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline;
3. require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced, and reflect the relevant character area design guidance in the Urban Design Study;
4. require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background;
5. ~~where appropriate,~~ seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured;
6. ~~preserve, or where appropriate, enhance~~ ~~seek improvements to~~ views within Conservation Areas, which:
  - a. are identified in Conservation Area Statements and Studies and Village Plans;
  - b. are within, into, and out of Conservation Areas;
  - c. are affected by development on sites within the setting of, or adjacent to, Conservation Areas and listed buildings.

### Explanation/Justification

- 17.1 We find Policy 31 unsound and too prescribed. Elements of the draft policy do not conform with the London Plan (2021), which states that development should not harm, and should seek to make a positive contribution to, the characteristics and compositions of Strategic Views and their landmark elements. We recommend the policy is redrafted in order to be brought in line with strategic planning policies of the London Plan (2021), specifically Policy HC4 – London View Management Framework.

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## 18. Policy 37 – Public Open Space

### Recommended Amendments and Explanation

- 18.1 As currently drafted the policy isn't fully evidenced to be properly justified. However, the stated intention to prepare further evidence to update the Public Open Space deficiency maps should address this.
- 18.2 We would welcome the opportunity to input into this evidence gathering work and reserve the opportunity to make further representations on the draft policy once this evidence is published.

---

## 19. Policy 38 – Urban Greening

### Recommended Amendments and Explanation

19.1 We recommend the following amendments to Part E of the policy

'Extensive green or brown roofs should be incorporated into developments with roof plate areas of 100sqm or more, where technically feasible. As much as reasonably possible of any potential roof plate area should be used as biodiversity-based extensive green or brown roof.'

19.2 We support the ambition of the policy however, there is no evidence to properly justify the 70% requirement which in practice would limit space needed for residential rooftop amenity, space for plant/services and maintenance, and is therefore likely to be too restrictive. The recommended amendments would ensure that the policy was capable of being **effective**.



## 20. Policy 45 – Tall and Mid-Rise Building Zones (and Appendix 3)

### Recommended Amendments (tracked changes to Reg.18 draft text)

#### Definitions

Buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be tall buildings. Buildings which do not trigger the definition of a tall building set out above, but are 5 storeys or over, or 15 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be mid-rise buildings.

A. Proposals for tall buildings will only be appropriate in tall building zones identified on the Policies Map and in Appendix 3, where the development would not result in any adverse visual, functional, environmental or cumulative impacts, having regard to all criteria set out in the London Plan Policy D9. To take account of the local context, proposals for tall buildings should address the following criteria:

#### Visual Impacts

1. Tall buildings should respect the views and vistas towards heritage assets across the borough and in neighbouring boroughs, including distinctive roof line features.
2. The location of tall buildings should avoid substantial visual interruptions in areas with otherwise very consistent building and/or roof lines.
3. Tall buildings should respond to the analysis of views and vistas (Policy 31 Views and Vistas) towards the site to ensure the form and detailing are sympathetic to the wider context.
4. Tall buildings should consider the design of the lower, middle and upper parts of the tall building and how they work together as well as with the surrounding area and mid-range and long-range views.
5. Development proposals should be supported with [visual impact analysis graphic 3D modelling](#) to assess the individual and cumulative impact of the proposal on both the existing and emerging skyline, and on day-time and night-time views, in line with Policy 44 Design process.
6. Development proposals affecting the setting and approaches of the Kew World Heritage Site, must address all criteria set out in Policy 29 Royal Botanic Gardens, Kew World Heritage Site

#### Spatial Hierarchy

7. The massing of tall buildings should [respond to respect](#) the proportions of their local environment, including the consideration of the width of adjacent streets as well as public open spaces, parks and watercourses, and should be designed so as not overwhelm the street and adjacent context.
8. In cases of tall buildings located close to the street edge, proposals should incorporate measures to soften their edges and provide positive public spaces at their base [through the use of generous walkways and mature planting.](#)
9. Proposals for Tall Buildings will not be permitted outside the identified Tall Building Zones (see Appendix 3)
- ~~10. Proposals for tall buildings should not exceed the appropriate height range identified for each of the tall building zones in Appendix 3. The height of tall buildings will be required to step down towards the edges of the zone as indicated on the gradient map~~

**Continued on the following page:**

**Cont.**

### **Tall and Mid-Rise Building Near the River Thames Frontage**

B. Proposals for tall and mid-rise buildings should address the following criteria:

1. The design of Tall buildings and mid-rise buildings fronting the River Thames must respond to views towards them as well as from them.
2. In areas of larger-scale riverfront buildings, consider landward facing orientation and ~~respond step down~~ appropriately to provide a transition towards the existing character and scale.
3. The design of tall buildings and mid-rise buildings should maintain the river frontage as a public resource. Developments should ~~respond to be set back to~~ physically and visually ensure the Thames Path acts and feels like a welcoming public route without heavy overlooking from adjacent riverside residences. Ground floor uses should seek to activate the space as far as possible.

### **Mid Rise Buildings**

C. Proposals for new mid-rise buildings or extensions to existing buildings which increase their height to 5 storeys or over, will usually only be appropriate in mid-rise and tall building zones identified on the Policies Map and in Appendix 3. Proposals will be required to meet the requirements of Policy 44 Design process and Policy 28 Local character and design quality and should

1. be carefully located and designed to ~~respond step down~~ to surrounding existing and proposed buildings;
2. respond positively and ~~conserveprotect~~ the setting of existing buildings in the surrounding area, including heritage assets;
3. respect the scale, width and proportion of adjacent streets and watercourses, and local character, including potential effects on key characteristics, valued features and sensitivities as outlined in the character area profiles in Section 3 of the Urban Design Study;
4. deliver a varied and interesting roofline in response to surrounding architectural styles, avoiding long monotonous blocks of development and/or excessive height.
- ~~5. Where proposals are located within identified mid-rise and tall building zones, buildings should not exceed the appropriate height identified in Appendix 3.~~
6. In cases of mid-rise buildings located close to the street edge, proposals should incorporate measures to soften their edges and provide positive public spaces at their base ~~through the use of generous walkways and mature planting.~~

D. Proposals for mid-rise buildings may be permitted outside the identified mid-rise and tall building zones where they are:

1. located in a town centre (Whitton, Teddington, Twickenham, Richmond and East Sheen). The Character Area Design Guidance in the Urban Design Study (2021) should be considered, where relevant, to demonstrate appropriateness to local context; and/or
2. within transitional areas to tall building zones; and/or
3. within or adjacent to areas which include buildings taller than the prevailing height or subject to substantial redevelopment; and/or
4. a result of land assembly which enables the creation of a comprehensive scheme; and/or
5. close to strategic roads and good public transport accessibility; and 6. able to meet Part C of this policy

---

## **Explanation/Justification**

- 20.1 As set out in Section 2 of this representation, we have demonstrated that the supporting evidence base set out in the Urban Design Study (2021) is unsound, lacking in the necessary thorough assessments to support specific height parameters within identified Tall Building Zones (as set out in Appendix 3). Owing to the evidence base that underpins and supports Policy 45 being unsound, we find the drafting of the Policy unsound. The recommended amendments set out above should make the policy sound.
- 20.2 More specific recommended amendments relate to policy requirements regarding the base of buildings, which require that “generous walkways and mature planting” should be provided at the base of tall and mid-rise buildings. The definition of the walkways is ambiguous, and the expectation of mature planting would be difficult to deliver from day one. There is no evidence provided within Urban Design Study to support this. This part of the policy should be more in line with London Plan Policy D9 which states “The function of the base should be to frame the public realm and streetscape, articulate entrances, and help create an attractive and lively public realm which provides a safe, inclusive, interesting, and comfortable pedestrian experience”.

## **Appendix 3 (Tall and Mid-rise Building Zones)**

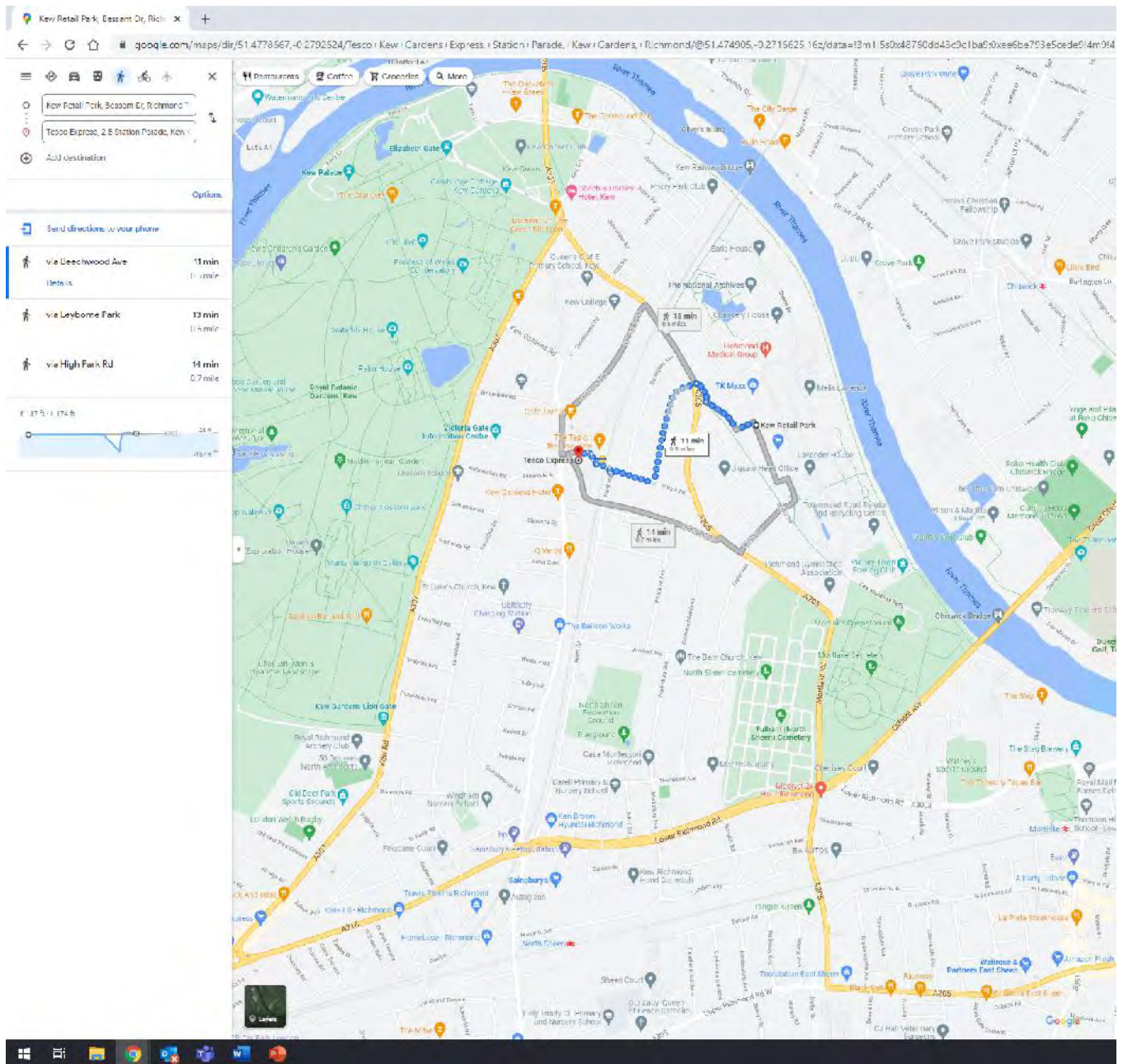
- 20.3 The content of Appendix 3 (including specifically 27.25-26 – Kew Retail Park) should be updated to account for our comments set out in Section 2, including with respect to the extent of the tall and mid-rise building zones and the stated appropriate heights.

# **Appendix A**

## Walk-time to Supermarkets

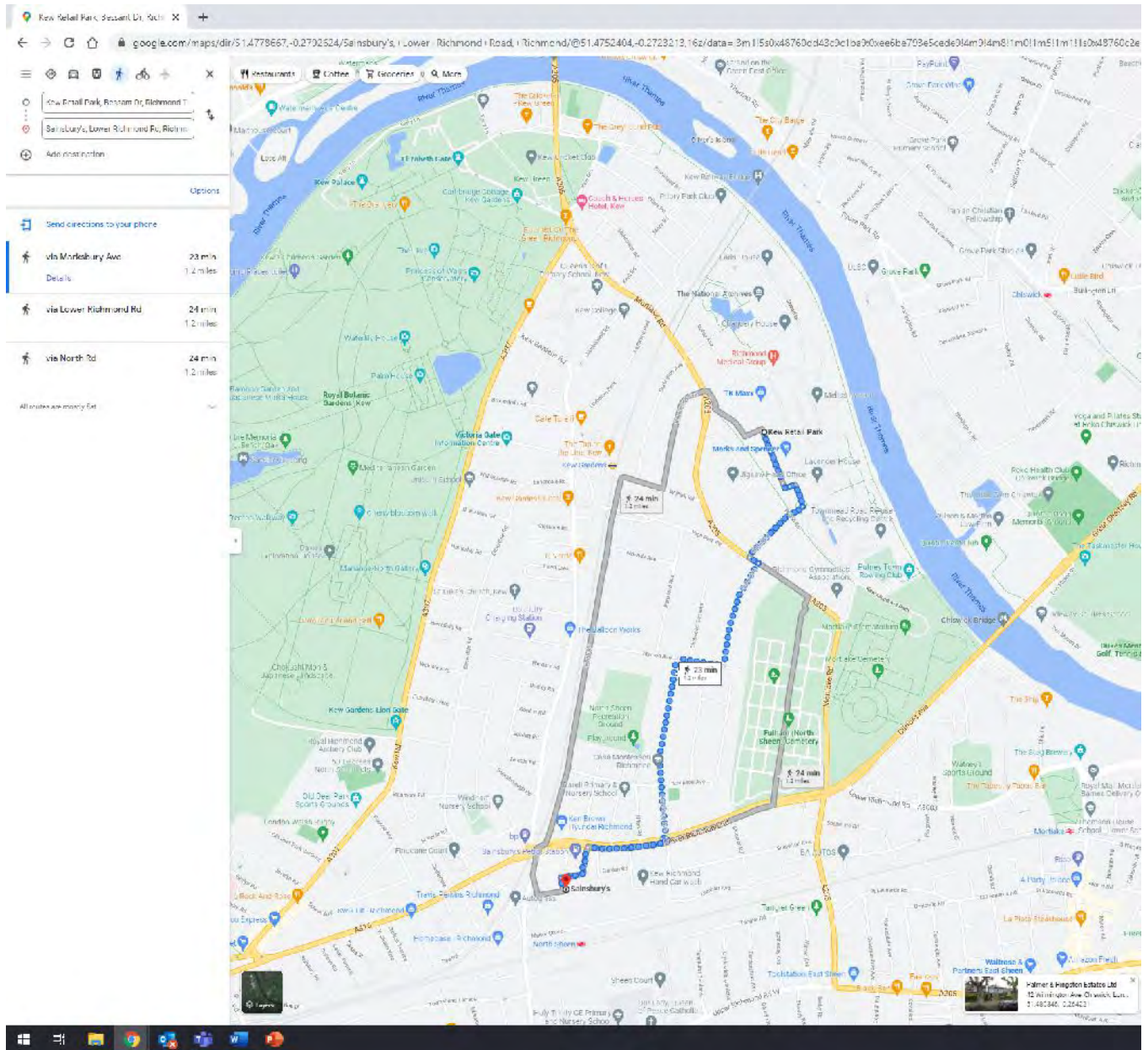


## Tesco Express, 2-8 Station Parade, Kew, TW9 3PZ



Source: Google (January 2022)

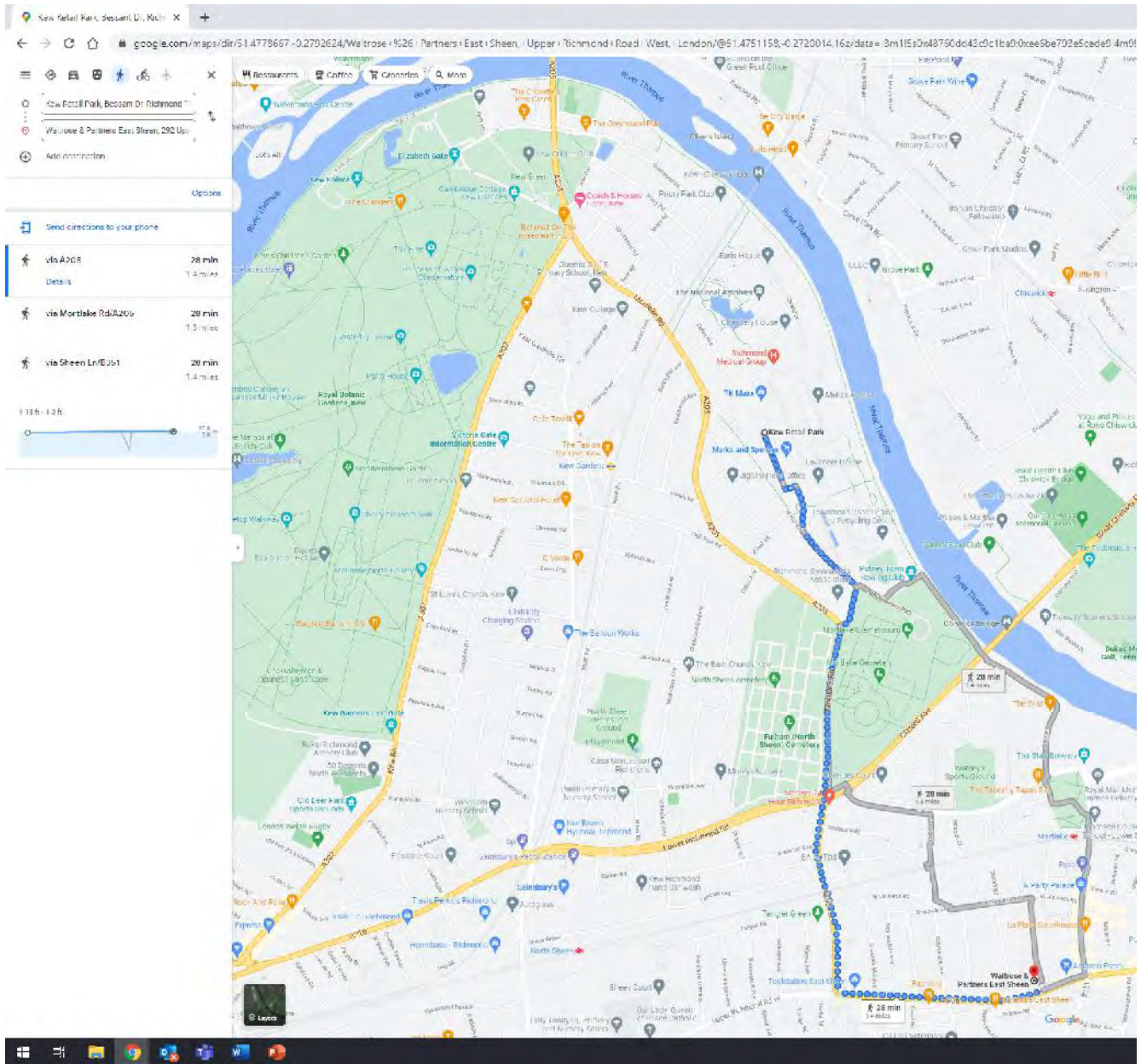
# Sainsbury's, Lower Richmond Road, TW9 4LT



Source: Google (January 2022)



# Waitrose, Upper Richmond Road, East Sheen, SW14 7JG



Source: Google (January 2022)

# **Appendix B**

## Site Ownership Plan





**Notes**

1. The client has provided the site plan for reference only. It is not intended to be used for any other purpose. It is the responsibility of the client to ensure that the site plan is accurate and up-to-date. It is not intended to be used for any other purpose, or for any other site plan, or for any other site plan, or for any other site plan.

Rev: 01/2018  
 Drawing Name: Ownership Plan

DRAFT



**The Kew Quarter**

**Ownership Plan**

Scale: 1:500  
 Drawing No: SK\_023  
 Date: 01/2018



# Contact details

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# **Appendix B St George and Marks and Spencer August 2022 Householder Survey Report (Extracts)**



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**Richmond Household Survey  
for  
Avison Young**

August 2022

Job Ref: 092A22

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# Introduction

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## 1.1 Research Background & Objectives

To conduct a survey amongst residents in and around Richmond, London area to assess shopping habits for main food and grocery, top-up food, non-food shopping, leisure activities and usage of local centres.

## 1.2 Research Methodology

A total of 1002 interviews were conducted between Monday 8<sup>th</sup> and Monday 22<sup>nd</sup> August 2022. Interviews were conducted using NEMS in-house CATI (Computer Assisted Telephone Interviewing) Unit. Respondents were contacted during the day and in the evening. All respondents were the main shopper in the household, determined using a preliminary filter question.

## 1.3 Sampling

### 1.3.1 Survey Area

The survey area was segmented into 9 zones defined by electoral wards. The zone details were:

Zone	Wards	Number of Interviews
1	E05000519 Ham, Petersham and Richmond Riverside E05000528 South Richmond	84
2	E05000527 St Margarets and North Twickenham E05000529 South Twickenham E05000531 Twickenham Riverside	115
3	E05000523 Heathfield E05000532 West Twickenham E05000533 Whitton	107
4	E05000518 Fulwell and Hampton Hill E05000522 Hampton Wick E05000530 Teddington	107
5	E05000520 Hampton E05000521 Hampton North	104
6	E05000524 Kew E05000526 North Richmond	100
7	E05000516 Barnes E05000517 East Sheen E05000525 Mortlake and Barnes Common	129
8	E05000348 Chiswick Homefields (Hounslow) E05000349 Chiswick Riverside (Hounslow) E05000191 Southfield (Ealing) E05000251 Askew (Hammersmith & Fulham) E05000261 Ravenscourt Park (Hammersmith & Fulham) E05000365 Turnham Green (Hounslow)	129
9	E05000362 Isleworth (Hounslow) E05000360 Hounslow South (Hounslow) E05000358 Hounslow Central (Hounslow) E05000347 Brentford (Hounslow) E05000364 Syon & Brentford Lock (Hounslow) E05000363 Osterley & Spring Grove (Hounslow) E05000192 Walpole (Ealing) E05000174 Ealing Common (Ealing) E05000182 Northfield (Ealing)	127
<b>Total</b>		<b>1002</b>

### **1.3.2 Telephone Numbers**

The landline numbers are generated through a process known as Random Digit Dialling (RDD), whereby we start with known 'seed' numbers and then generate all possible number combinations around these. Known business numbers are removed and the remaining numbers are randomly sorted to give each number the same and equal chance of being selected.

The benefit of using RDD numbers (as opposed to those generated from pre-existing lists such as telephone directories and Electoral Register entries) is that ex-directory numbers are also included in the survey sample. In practice, this means that the sample provided is in no way preselected, and that consumers who had opted-out of providing their telephone contact details to directory operators had the opportunity to take part in the research, thereby removing potential bias in the sample.

Mobile numbers were also included in the survey sample to further increase the inclusivity of the survey, given the increase in the number of mobile-only households amongst certain demographic groups (especially younger people and lower income households). These numbers are generated from a variety of commercial sources, where permission has been given to use such contact information for research and marketing purposes.

We don't screen against the TPS (Telephone Preference Service) database, again because the demographic profile of TPS registered numbers is slightly different to the rest of the population. In addition, there is no legal requirement to screen against TPS registered numbers; market research is not classified as unsolicited sales and marketing.

### **1.3.3 Time of Interviewing**

Approximately two-thirds of all calls are made outside normal working hours.

### **1.3.4 Sample Profile**

It should be noted that as per the survey's requirements, the profile of respondents is that of the main shopper / person responsible for most of the food shopping in the household. As such it will always differ from the demographic profile of all adults within the survey area. With any survey among the main shopper / person responsible for most of the food shopping in the household the profile is typically biased more towards females and older people. The age of the main shopper / person responsible for most of the food shopping in the household is becoming older due to the financial constraints on young people setting up home.

A number of measures are put in place to ensure the sample is representative of the profile of the person responsible for most of the food / shopping in the household.

First of all, interviewing is normally spread over a relatively long period of time, certainly longer than the theoretical minimum time it would take. This allows us time to call back people who weren't in when we made the first phone call. If we only interview people who are at home the first time we call, we over-represent people who stay at home the most; these people tend to be older / less economically active.

We also control the age profile of respondents; this is a two-stage process. First of all, we look at the age profile of the survey area according to the latest Census figures. Using a by-product from additional data we collect from a weekly telephone survey of a representative sample of all adults across the country we know the age profile of the main shopper in any given area. This information is from data based on in excess of 100,000 interviews and is regularly updated and is therefore probably the most accurate and up to date information of its kind.

Stratified random sampling helps ensure that the sample is as representative as possible. While the system dials the next randomly selected number for interviewers, all calls are made by interviewers; no automated call handling systems are used.

### **1.3.5 Monitoring of Calls**

At least 5% of telephone interviews are randomly and remotely monitored by Team Leaders to ensure the interviewing is conducted to the requisite standard. Both the dialogue and on-screen entries are monitored and evaluated. Interviewers are offered re-training should these standards not be met.



## 1.4 Weightings

To correct the small differences between the sample profile and population profile, the data was weighted. The population is of the main shopper in the household. Weightings have been applied to age bands based on an estimated age profile of main shoppers (see section 1.3.3 for details). The weighted totals differ occasionally from the adjusted population due to rounding error. Details of the age weightings are given in the table below:

Age	Main Shopper Profile (%)	Interviews Achieved	Age Weightings
18-34	22.8%	110	2.0747
35-44	23.6%	63	3.7590
45-54	17.9%	67	2.6823
55-64	16.6%	158	1.0553
65+	19.0%	604	0.3154
<b>Total</b>		<b>1002</b>	

Further weightings were then applied to the zone data, to adjust zone samples to be representative by population. Details of those weightings are given in the table below:

Zone	Population *	Interviews Achieved	Interviews Achieved (Weighted by Age)	Zone Weightings
1	21,137	84	56	0.7311
2	31,555	115	83	0.5959
3	30,593	107	81	0.8283
4	30,682	107	81	0.8822
5	19,372	104	51	0.6834
6	22,085	100	58	0.7913
7	31,566	129	83	0.8758
8	72,756	129	192	1.2516
0	120,358	127	317	1.5816
<b>Total</b>	<b>380,104</b>	<b>1002</b>	<b>1002</b>	

\* Source: 2011 Census

## 1.5 Statistical Accuracy

As with any data collection where a sample is being drawn to represent a population, there is potentially a difference between the response from the sample and the true situation in the population as a whole. Many steps have been taken to help minimise this difference (e.g. random sample selection, questionnaire construction etc) but there is always potentially a difference between the sample and population – this is known as the standard error.

The standard error can be estimated using statistical calculations based on the sample size, the population size and the level of response measured (as you would expect you can potentially get a larger error in a 50% response than say a 10% response simply because of the magnitude of the numbers).

To help understand the significance of this error, it is normally expressed as a confidence interval for the results. Clearly to have 100% accuracy of the results would require you to sample the entire population. The usual confidence interval used is 95% - this means that you can be confident that in 19 out of 20 instances the actual population behaviour will be within the confidence interval range.

*For example, if 50% of a sample of 1002 answers “Yes” to a question, we can be 95% sure that between 46.9% and 53.1% of the population holds the same opinion (i.e. +/- 2.5%).* The following is a guide showing confidence intervals attached to various sample sizes from the study:

<b>%ge Response</b>	<b>95% confidence interval</b>
10%	±1.9%
20%	±2.3%
30%	±2.8%
40%	±3.0%
50%	±3.1%

## 1.6 Data Tables

Tables are presented in question order with the question number analysed shown at the top of the table. Those questions where the respondent is prompted with a list of possible answers are indicated in the question text with a suffix of [PR].

The sample size for each question and corresponding column criteria is shown at the base of each table. A description of the criteria determining to whom the question applies is shown in italics directly below the question text; if there is no such text evident then the question base is the full study sample. If the tabulated data is weighted (indicated in the header of the tabulations), in addition to the sample base, the weighted base is also shown at the bottom of each table.

Unless indicated otherwise in the footer of the tabulations, all percentages are calculated down the column. Arithmetic rounding to whole numbers may mean that columns of percentages do not sum to exactly 100%. Zero per cent denotes a percentage of less than 0.05%.

Percentages are calculated on the number of respondents and not the number of responses. This means that where more than one answer can be given to a question the sum of percentages may exceed 100%. All such multi-response questions are indicated in the tabulated by a suffix of [MR] on the question text.

Where appropriate to the question, means are shown at the bottom of response tables. These are calculated in one of two ways: if the data is captured to a coded response a weighted mean is calculated and the code weightings are shown as a prefix above the question text; if actual specific values were captured from respondents these individual numbers are used to calculate the mean.

## Appendix 9:

### Sample Questionnaire



Job Number: 092A22  
Richmond Household Survey

Good morning / afternoon / evening, I am ..... from NEMS market research, and we are conducting a short survey in your area about food and non-food shopping. Do you have time to answer some questions? It will take about five minutes.

**QA Are you the main shopper in your household?**  
DO NOT PROMPT, ONE ANSWER ONLY

- 1 Yes GO TO Q01  
2 No CLOSE

**READ OUT:** First we have a few questions about where you undertake food and groceries shopping. In answering these questions the location may be a supermarket, a smaller store or town centre, or local shopping parade, or could be the use of facilities such as the Internet.

**Q01 Where do you do most of your household's main food shopping?**  
DO NOT PROMPT, ONE ANSWER ONLY. PROBE FULLY FOR STORE / LOCATION. IF 'OTHER' PLEASE SPECIFY LOCATION. IF 'MARKET STALL' PROBE FOR LOCATION AND CODE IN OTHER as 'Market - Location'

- #Food Food List GO TO Q02  
500 Other (PLEASE WRITE IN) GO TO Q02  
502 Internet / home delivered GO TO Q02  
505 (Don't know / varies) CLOSE SURVEY  
506 (Don't do this type of shopping) CLOSE SURVEY

**Q02 Apart from (STORE / CENTRE MENTIONED AT Q01), where else do you regularly do a main food shop?**  
DO NOT PROMPT, ONE ANSWER ONLY. PROBE FULLY FOR STORE / LOCATION. IF 'OTHER' PLEASE SPECIFY LOCATION. IF 'MARKET STALL' PROBE FOR LOCATION AND CODE IN OTHER as 'Market - Location'

- #Food Food List  
500 Other (PLEASE WRITE IN)  
502 Internet / home delivered  
505 (Don't know / varies)  
507 (Nowhere else)

**Q03 Approximately how much money does your household normally spend on a main food and grocery shop?**  
DO NOT PROMPT. PLEASE WRITE IN TO THE NEAREST £

- X (PLEASE WRITE IN)  
Y (Don't know / varies)  
Z (Refused)

**Q04 How often does your household do a main food and grocery shop?**  
DO NOT READ OUT. ONE ANSWER ONLY

- 1 7 times a week  
2 5 - 6 times a week  
3 4 times a week  
4 3 times a week  
5 Twice a week  
6 Once a week  
7 Once every 2 weeks  
8 Once a month  
9 Less often  
A (Don't know / varies)

**Q05 Where do you do most of your household's small scale 'top-up' food shopping?**  
DO NOT PROMPT, ONE ANSWER ONLY. PROBE FULLY FOR STORE / LOCATION. IF 'OTHER' PLEASE SPECIFY LOCATION. IF 'MARKET STALL' PROBE FOR LOCATION AND CODE IN OTHER as 'Market - Location'

- #Food Food List  
500 Other (PLEASE WRITE IN) GO TO Q06  
502 Internet / home delivered GO TO Q06  
505 (Don't know / varies) GO TO Q09  
506 (Don't do this type of shopping) GO TO Q09

Those who do top-up food shopping at Q05

**Q06 Where else do you do your household's small scale 'top-up' food shopping?**  
DO NOT PROMPT, ONE ANSWER ONLY. PROBE FULLY FOR STORE / LOCATION. IF 'OTHER' PLEASE SPECIFY LOCATION. IF 'MARKET STALL' PROBE FOR LOCATION AND CODE IN OTHER as 'Market - Location'

- #Food Food List  
500 Other (PLEASE WRITE IN)  
502 Internet / home delivered  
505 (Don't know / varies)  
507 (Nowhere else)

Those who do top-up food shopping at Q05

**Q07 Approximately how much money does your household normally spend on a 'top-up' food and grocery shop?**  
DO NOT PROMPT. PLEASE WRITE IN TO THE NEAREST £

- X (PLEASE WRITE IN)  
Y (Don't know / varies)  
Z (Refused)

# Contact details

## Enquiries

Nicholas Alston



## Visit us online

[avisonyoung.com](https://www.avisonyoung.com)

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### Avison Young

65 Gresham Street, London EC2V 7NQ

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## Annex 2. Site Photographs

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**Appendix 1 - List of relevant online planning history associated with 84 Lower  
Mortlake Road**

Ref	Approved / Refused	Date	Description
72/1155	App	1972	Replacement of main doors with new window and brickwork. Alterations to fenestration and removal of toilets on ground and first floors.
72/1598	App	1972	Use of industrial parts of existing office and industrial building for office purposes only and erection of porch at front of building.
73/0414	App	1973	Provision of car parking area.
84/0412	Ref (at appeal)	1985	Demolition of the existing office building and redevelopment to provide 1,482.59 sq m of new office building.
85/1276	App	1985	Erection of part two storey, part four storey office building with parking at basement level and ground level for a total of 40 cars.
87/0427	App	1987	Erection of part two storey, part three storey and part four storey office building with parking at basement level and ground level for a total of 40 cars. (Amended Plan No.(s) 2922/139A and 219B received on 31.3.1987).
87/0427/DD02	App	1988	Details pursuant to cond 14
88/1312	App	1988	Retention of plan above 3rd floor roof and erection of universal louvre screening. (Amended Plan No.(s) 2922/219F and 2922/890A received on 6.7.88).
87/0427/DD03	App	1988	Details pursuant to cond 3
89/0245/FUL	App	1989	New rear door and balustrading to provide disabled access to the building involving the loss of 2 car parking spaces
01/2046/FUL	App	2002	Erection Of Rear Extensions And Infill Of Part Of The Undercroft To Provide Additional Office Accommodation And Re-siting Of Refuse Storage Area.
01/2046/DD01	App	2002	Details pursuant to cond BD12
02/1225	App	2002	Infill Of Part Of The Undercroft To First Floor To Provide Offices (b1) (amendment To Permission 01/2046/ful).
20/3359/FUL	App	2021	Extension of existing 4 storey Class E Office building to provide new entrance, enlarged office space and external terraces.

**84 LOWER MORTLAKE ROAD, RICHMOND, TW9 2HS**

**MARKETING REPORT**



**Instructions received from William Grant & Sons**

**This report is for the exclusive use of the named party, their representatives and the planning Department at Richmond Council.**

**June 2023**

### **Introduction**

Further to your instructions the subject property was inspected by Stirling Shaw in order to commence a full marketing campaign to let the property either in its existing condition as E Class offices or as other E class employment floorspace.

### **Stirling Shaw**

With over 20 years combined experience in South-West London, Stirling Shaw are specialist commercial property consultants. Based in Richmond, they have extensive expertise in sales and lettings across all commercial sectors and the company adopts a proactive, 'out of the box' approach to targeted marketing that has proved to be highly effective.

It was agreed that it was not necessary to appoint 2 agents as Stirling Shaw are Richmond experts; they have an unrivalled knowledge of the property and the local office market and with the benefit of multi-media internet advertising, they would be able to cover local, central London and national enquiries that may arise.

### **Location**

Richmond is one of the most affluent London suburbs known for its high-quality amenities and specialist retailers including restaurants, cafes and bars, as well as a range of local schools. The parks and River Thames are a further draw for locals, employers and tourists alike.

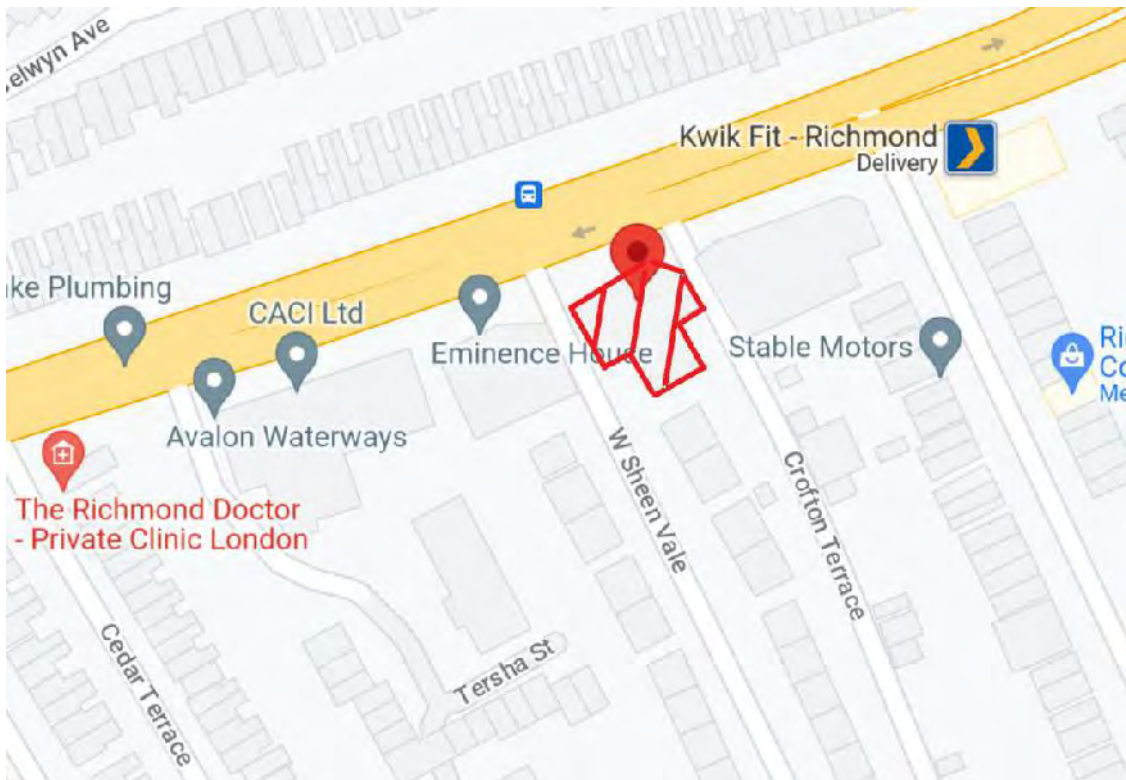
It is a densely populated and attractive residential area benefitting from excellent transport links via overland and underground train lines from Richmond Station, which provide access to central London within 20 minutes. The adjacent A316 provides direct and convenient access to the M3 and M25.

The subject property is situated on Lower Mortlake Road (A316), approximately 0.5 miles from Richmond Town Centre. Lower Mortlake Road is a well-established location, predominantly occupied by residential and tertiary retail units. Independence House is the last office building along the A316 from Richmond Town Centre and is considered to be in an 'out of town' location.





The property occupies a prominent corner position at the junction of Lower Mortlake Road, Crofton Terrace, and W Sheen Vale, with access to the rear car park off Crofton Terrace.





## Description

The subject property comprises self-contained offices on ground, first, second and third floors, with ancillary storage in the basement. Each floor can be accessed independently from a central stairwell as well as a lift core that serves all levels. In addition to the 15 surface parking spaces at the rear, the property benefits from 22 secure spaces in the basement, accessed via a ramp at the rear.

(Appendix 1 – Photos)

The net internal areas are as follows:

	Sq M	Sq Ft
Ground	386.00	4,154
First	397.80	4,282
Second	279.10	3,004
Third	158.60	1,707
<b>Total</b>	<b>1,103.50</b>	<b>12,836</b>

## Background History 1985 – 2021

The building was constructed in the mid 80's and was owned and occupied by William Grant & Sons (WGS) as their London HQ. By 2019 the building was extremely dated and beyond economic repair and as such required a full 'back to internal frame' refurbishment. After almost 35 years of staff walking up and down the A316, WGS elected to move closer to the town centre and purchased the Old Court House, Parkshot.

WGS moved into The Old Court House in Jan 2020 and Independence House has been vacant ever since.

## 2021 Planning Consent:

In 2019 it was agreed that prior to re-letting, the property required a full refurbishment in order to provide Grade A offices that would appeal to good quality tenants and compete with similar Grade A offices in the Town Centre. WGS appointed a full design team to review the potential to increase the floor area / employment space and provide onsite amenities that would compete with other similar offices available to rent in the town centre, namely [Frameworks House](#) , [Evergreen Studio](#) , [Greyfriars Studio](#) and [Holbrook Studio](#)

Planning consent (Ref: 20/3359/FUL) was eventually obtained in Feb 2021 to extend the existing 12,836 sqft to 15,467 sqft and fully refurbish to Grade A spec, including 3 x roof terrace, state of the art cycling/changing facilities, gym, ERV recharging points, flexible/divisible space and a co working reception area. (Appendix 2 – Consented Scheme)

WGS's senior design team were then instructed to proceed to RIBA 3 and provide an updated cost plan and residual appraisal to evaluate the financial viability of the scheme in the prevailing market. In preparation of implementing the consent, the subject property was also completely stripped back to frame internally.

In 2021, the project budget was forecast to be £5.8m to undertake the full refurbishment, based on construction costs of £250 psf and professional fees of 13.40%. The prevailing occupational market was extremely thin with very few live tenant requirements and WGS expressed grave concerns about their financial exposure to open ended void periods. In the absence of a pre-let or strong indications

that the building would let within 6-9 months of PC, WGS were facing a potential loss of over -£700,00 if they had continued with a speculative scheme (Appendix 3 – Residual Appraisal). They therefore elected to delay implementing the scheme until market conditions improved or at least 50% of the building was signed up on a pre let. Stirling Shaw were instructed to continue to advertise as widely as possible and consider all E Class users as potential occupiers.

At the time of writing this report, due to double-digit inflation, the build costs of the consented scheme have risen from £250 psf to £350 psf, whilst rents have remained stagnant and yields have softened. To implement a speculative scheme in the current market WGS could face losses of over £2.7m; this has rendered the scheme completely financially unviable for the foreseeable future.

***“double digit inflation build costs, open ended marketing voids and stagnant rents have rendered the scheme not financially viable to implement”***

### **Market Overview**

At the start of 2020 the market was beginning to see the grass roots of an increase in occupier demand across all sectors as the economy finally settled down after Brexit. By Q2 2020 however, the Covid pandemic had brought an immediate halt to all hope of recovery and it caused a dramatic change to working environments; as the nation was forced to comply with Covid restrictions, companies had to rapidly adapt to homeworking as a full-scale closure of commercial premises took place.

As workers emerged from lock down, companies recognised that they could sustain the same level of office productivity whilst retaining a proportion of staff to work from home; this provided an opportunity to review their occupational requirements and potentially reduce their overheads.

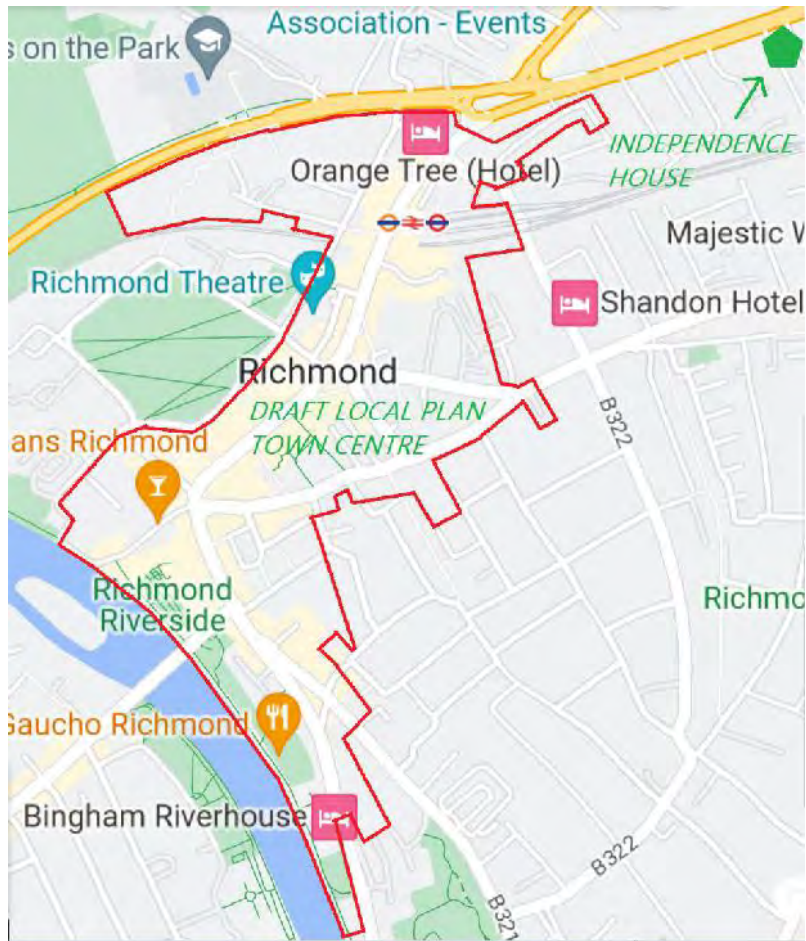
The introduction of the E class use has also had a positive impact on the commercial landscape as landlords have been able to cut through the planning ‘red tape’ and access occupational demand from a wider range of different use classes. Offices in tertiary ‘edge of town’ locations also experienced a spike in demand in particular from nursery providers (former D1) who were able to operate under the new E class.

Post covid, there was an expectation that there would be a noticeable increase in demand for offices in commuter towns such as Richmond due to companies reconciling their desk requirements and decentralising from London to save costs. However, this did not transpire and indeed the opposite appeared to be happening. Having rationalised their desk requirements, existing companies in Richmond such as TRO and Notonthehighstreet.com elected to move out of Richmond and into central London in an attempt to retain / attract high quality staff.

### **Demand for Richmond Town Centre Grade A Office Use**

The prime office market in the proposed Draft Local Plan Town Centre Area orientates around the George Street - Eton Street - Red Lion St one-way system, extending down The Quadrant towards the train station. Expansion of the town centre has always been severely restricted over the decades due to the natural constraints of being immediately adjacent to Richmond Park, the River Thames and the A316 South Circular. As such, demand has focused on offices located directly in the town centre that are close to the train station and local amenities such as The Green and Richmond Riverside.

Occupiers looking to acquire offices in Richmond town centre frequently include other towns with similar characteristics in adjacent boroughs, such as Chiswick, Hammersmith and Wimbledon in their search, as these towns offer comparable transport, amenities and demographics to Richmond. Rarely do 'Richmond' requirements also consider secondary towns in the Borough such as Twickenham, Kingston or Hampton as alternative locations to Richmond, which is an important factor to consider when analysing 'supply and demand' for offices in the Richmond Borough as a whole.



***“over-supply and vacancy in the wider Borough is rarely absorbed by excess demand for offices in Richmond town centre”.***

Over the last 3 years, take-up for prime, Grade A offices in the Draft Local Plan Town Centre Area only (see red outlined area above) was as follows:

2022,	16,006 sqft
2021	21,673 sq ft
2020	29,017 sqft

***“the average Grade A take up in the Draft Local Plan Town Centre over the last 3 years was only 22,232 sqft” pa***

(Appendix 4 Lettings Schedule)

Transactional evidence shows that there has been a noticeable 'flight to quality' as tenants seek to acquire high quality offices in the right location in an attempt to attract high calibre staff back to the office environment. In 2022, town centre offices with full amenities, such as Frameworks House, absorbed the majority of tenant demand and only when it was fully let did tenants seek 'next best' offices in the town centre; enquiries for similar buildings such as Evergreen Studio and Greyfriars only picked up after Frameworks House was fully let. This would suggest that until the best Grade A offices in the Draft Local Plan Town Centre Area are fully let, other comparable Grade A Offices in secondary, edge of town locations will remain vacant.

A prime example of this is Holbrook Studio, located just off Hill Rise; this Grade A building was fully refurbished in 2018, and despite offering a very high spec fitout, the 10,000 sqft ground floor suite still remains vacant after 5 years of marketing with 3 agents appointed.

***“...offices in secondary, edge of town locations continue to remain empty as selective tenants target best in class offices in the town centre”***

In addition to standard Grade A office tenants, co-working/flexi space operators have been attempting to break into the Richmond market and gain a market share of the growing demand for short term fitted offices. The challenges with this model is that operators often require 'management agreements' whereby rent is substituted for profit share; historically this has proved difficult for mortgage backed LL's to facilitate as both income stream and asset values can be severely compromised; aside from Arevo and Regus, the only new serviced office entrant has been the arrival of Boutique Office at Sovereign Gate. This 20,000 sqft former police station was converted to Grade A offices in 2019 and after 4 years of vacancy the LL finally acquiesced to undertaking another full refit to provide Boutique's required spec.

Due to the very tight geographical constraints of Richmond, virtually all the Grade A and B offices are located within the area identified by the Draft Local Plan Town Centre Area– Avalon House and Independence House are the only 2 large office buildings located 'out of town'.

Whilst there is a premium rent for prime locations such as Richmond Riverside, vacancy rates, rent levels and demand for Grade A offices is largely determined by the quality of the fit out and amenities. There is less demand for Grade B offices due to the fact that Richmond attracts high calibre occupiers who are prepared to pay high rents for top quality offices that reflects their brand. It is not the case that by offering a lower quality fit out at a lower rent, Grade B buildings will let, as tenants will opt for the better quality buildings. This is evidenced by Ambassador House, which is located in the Town Centre on Paradise Road; the building had a 'light touch' refurb and was marketed at £49.50 psf, discounted from £55 psf to reflect the Grade B fitout. The building has been widely marketed for over 2 years and is still vacant.

### **Demand for alternative Uses**

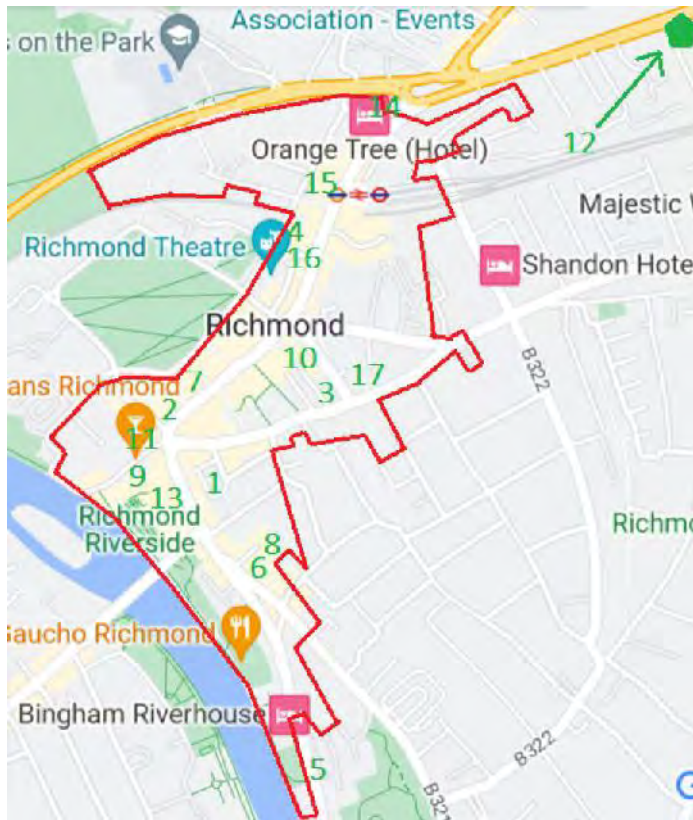
The introduction of E Class use in Sept 2020 provided Landlords the opportunity to explore alternative occupiers for office buildings.

Nursery operators, gyms, schools and medical providers in particular sought out previously unobtainable premises in Richmond and were able to trade under E Class, although each sector has its own punitive occupational and operational requirements in comparison to offices; for instance, nursery's and schools require outdoor space whilst gym and medical operators can only pay between £30 - £40 psf, for a Grade A office that could otherwise achieve £55 psf.

An example of this would be a requirement for 5,000 sqft in Richmond from an established operator providing high quality child care that came out in July 2022. They did not require a town centre building as their model works on being in close proximity to densely populated residential areas. The subject property was considered to be in the right 'edge of town centre' location and was easily accessible on foot from the surrounding residents, but it was not suitable due to lack of external space needed for a secure play area. Whilst there is external space to the rear of Independence House, it was not feasible to accommodate both a play area and parking for the remaining 10,000 sqft. The operator is now under offer at another E Class building on the outskirts of Richmond.



**Supply and Availability** There is approximately 263,000 sqft of Grade A offices either currently available to let with immediate occupation or are consented schemes that are scheduled to be delivered to the market in the next 12 – 18 months:



**CURRENT GRADE A SUPPLY CHAIN:**

1 One Castle Yard	20,645
2 80-82 George Street	25,000
3 Explore, Paradise Rd	43,450
4 Evergreen Studio	15,000
5 Richmond Brewery Stores	6,500
6 Holbrook House	2,274
7 Sheerwater House	2,000
8 Holbrook Studio	10,000
9 3 Water Lane	9,624
10 1 Eton Street	28,379
11 Water Lane Building	6,699
12 Independence House	15,467
13 Palm Court	17,000
14 63 Kew Road	32,500
15 Midmoor House	2,000
16 Greenside (Illoyds)	15,231
17 Peregrine House	11,202
<b>TOTAL SQ FT</b>	<b>262,971</b>

Independence House only comprises 5.88% of the total supply chain and is the only Grade A office building available to let located outside of the Draft Local Plan Town Centre Area. (see map above)

Such is the current over supply of Grade A offices in the Draft Local Plan Town Centre Area, with expected vacancy rates of 18 – 24 months and rising build costs, some schemes are even being put on hold. In addition to the subject property, [One Castle Yard](#) comprises a recently consented 20,645 sqft Grade A scheme located in the Draft Local Plan Town Centre Area which has just been put on hold by the owners until a pre let on at least 50% of the building has been secured. Keir Property have also postponed the delivery of 15,000 sqft at [Greenside](#) on Little Green, until a pre let has been secured.

There is also a considerable over supply of Grade B offices, with approximately 68,259 sq ft available to let:

**CURRENT GRADE B SUPPLY CHAIN:**

Ashley House	10,277
Ambassador House	23,000
Avalon House	5,764
Marcar House	2,326
Dome Building	3,847
9-11 The Quadrant	1,358
Vectra House	5,629
Onlso House	4,158
9-11 Sandycombe Road	5,200
Westminster House	4,200
Goodwin House	2,500
<b>TOTAL SQ FT</b>	<b>68,259</b>

**NB:** in addition to the aforementioned Grade A offices, the Grade B offices listed are also located within the Draft Local Plan Town Centre Area.

As an example of Grade B offices outside the Draft Town Centre Area, Avalon House is located adjacent to Independence House on Lower Mortlake Road; it is a multi-let purpose built office building with 5,764 sqft currently vacant and available to let. It has been widely marketed for over 2 years by national agents, Knight Frank and Bray Fox Smith, at a discounted rate of only £40 psf; as at time of writing, the letting agents reported that the offices were still vacant.

With regard to serviced offices / co working space, in addition to the recently launched 24,000 sqft at 18-20 Kew Road by Boutique, there is current application to deliver a further 20,000 sqft at London House, 243-253 Lower Mortlake Road, which is due to be determined Q3 2023.

***“... Based on the last 3 year average Grade A take up of 22,232 sqft pa, it will take ~11.8 years to absorb the current Grade A availability in Richmond town centre”***

### **Suitability of the Subject Property for Office and other E Commercial Use**

The property is located in a tertiary commercial area, 0.5 miles outside of Richmond Town Centre, and predominantly surrounded by residential accommodation.

Whilst the building has historically been used for offices and would be conducive to future office occupiers, it requires a full ‘back to frame’ internal refurbishment; this has been estimated to now cost £7.5m to undertake, based on build costs of £350 psf and project posts of 10%. In consideration of the substantial over supply, estimated 11 year absorption rate of central Richmond offices and an additional 12-18 months marketing/vacancy void, it is not in any way financially viable to build out as a speculative office scheme. Similar to One Castle Yard, in the absence of at least 50% of the building being pre let, the building will remain unoccupied indefinitely.

Alternative uses have been investigated.

Nursery occupiers were targeted and interest was generated on the basis of providing ground, lower ground and first floor accommodation. Whilst the external space is limited due to the access requirements for the basement parking, there could have been a small area of circa 500 sqft allocated for outdoor play.

Co working / serviced office operators were targeted and interest was generated on the basis of providing a fully fitted ‘turn key’ product and a management agreement tenancy. This would have required WGS to fit out to the operators specification and ‘rent’ would be paid by way of a profit share after all operating costs have been covered. It would have required WGS to become a ‘co investor’ in the serviced office model, which required a level of management expertise which WGS’s Board was not capable of providing.

### **Marketing Strategy**

We have undertaken a robust and active marketing campaign. The site was first advertised in August 2020 on a wide variety of platforms, namely:

- Highly visible ‘To Let’ board fixed to the building’s façade ordered on 15/04/21 (Appendix 5)
- In house marketing details regularly circulated to our database of applicants (Appendix 6)

- Externally advertised on national media platforms, including EACH, EG Property Link, Agents Society, LoopNet (CoStar) and Realla.  
(Appendix 7 / 7A / 7B / 7C / 7D)

In order to capture all possible types of interest, the property was advertised as 'Offices' on a number of external websites, as well erecting a 'To Let' board that stated 'E Class Use Commercial Use – All Enquiries'

The property was marketed on a new lease, terms to be agreed, at £50 psf per annum exclusive, which was at a discount to prime central Richmond office rents of £57.50 psf, in order to reflect the 'out of town' location. The building was available as a whole or individual floors, which were designed to be easily divisible should a tenant only require half a floor.

During the period of marketing we received 15 direct enquiries from a variety of operators including standard office occupiers, serviced office operators and nursery providers. With each applicant, onsite viewings were provided, a full cgi pack of the proposed scheme and an invitation to have a design input on their floor space.

The first interest was received from TCC in May 2021, a global brands company looking to relocate their HQ. After 6 viewings, terms were issued for a new lease on the whole building at a rent of £50 psf. Despite continued efforts to agree terms, TCC elected not to pursue it further as they wanted a 'central location' for their HQ.

In Sept 2021 we had strong interest from The Golf Rooms, who wanted to open a co working office club to the golfing fraternity as well as offering an indoor virtual practice range. After numerous viewings they elected to pursue offices at Greyfriars Studio as it was located in the town centre, directly opposite the tube station.

2022 saw a continual flow of interest from a wide variety of occupiers. In addition to standard office tenants, we had interest from a nursery provider who expressed interest in taking the ground and first floors. Further investigations however, showed that the rear car park could not accommodate their requirements for an external play area, without cutting off access to the basement car park.

We also received numerous enquiries from serviced office operators. The majority of the parties operated on a management agreement with turnover rent, and WGS would be required to provide a full 'turn key' product. The model also required WGS to become a 'stakeholder' in the operating model, whereby they receive either a low base rent of ~ 60% of the full rental value or a 'profit rent' once all operating costs had been covered. After further consideration, the building was ruled out and no offers were received due to the 'out of town' location. S/O operators require good access to public transport and local amenities, and with The Boutique Company opening up a new centre immediately adjacent to Richmond Station, feedback from operators was that Independence House was in an inferior, tertiary location which could not compete with The Boutique Company and would not generate the required rent to justify the fit out costs. (Appendix 8 – Schedule of Interested Parties)

### Marketing Conclusion

The property has been widely marketed now for almost 3 years. We have received a good level of interest which clearly demonstrates that the various marketing platforms have made the property readily accessible to both commercial agents and members of the public. Out of the 11 parties who made direct enquiries, only 2 followed through with actual viewings but no offers were received to rent any of the available space.

In consideration of the marketing campaign and research undertaken we would draw the following observations:

- There is a chronic over supply of Grade A offices in the Draft Local Plan Town Centre Area and the current supply chain stands at ~263,000 sqft of offices available in the next 12 months.
- Average take up for the last 3 years is approximately 22,000 sqft per annum
- Unless there is a dramatic increase in demand and a lettings bonanza, it will take approximately 11.8 years for the current supply to be absorbed.
- Since the building became vacant in Jan 2020, every effort has been made to maximise the commercial/employment generating opportunities, including obtaining planning consent to expand and fully refurbish the whole building, which cost WGS over £60,000 in professional fees just to obtain planning consent.
- Due to severely escalating build costs and 'open ended' marketing/vacancy periods it was not financially viable to speculatively implement the consented office scheme
- The marketing has successfully generated interest from office occupiers but each party has ultimately dismissed the subject property in favour of offices located in central Richmond, or similar towns such as Chiswick, Hammersmith and Wimbledon.
- there is demand from other sectors such as nursery providers but due to a lack of sufficient external space the building is not suitable
- there is demand from serviced office providers, but their preference is for central Richmond and the management agreements offered are incompatible with WGS's development model and Management Board.
- For as long as there are competing Grade A offices available in the Draft Local Plan Town Centre Area, Independence House will remain vacant as tenants elect to be located in central Richmond.
- Downgrading the spec and offering the subject property to let at a lower rent is not economically viable and it will still complete with over 68,000 sqft of Grade B offices available to let

To conclude, we are firmly of the opinion that, whilst the building has the potential to be let to an E Class occupier, in consideration of the above observations the subject property will remain vacant for the foreseeable future and it is not financially viable to implement the consented commercial scheme.

Yours sincerely,

*Stirling Shaw*

Stirling Shaw Ltd



**Appendix 1 - Site Photos post strip out**



**Appendix 2 – 2021 Consented Office Scheme to expand to 15,000 sqft**





### Appendix 3 – Residual Appraisal

REVENUE						£
						p.a.
<b>Commercial Office</b>		<b>Sq M</b>	<b>Sq Ft</b>		<b>p.s.f (£)</b>	
	Roof Terrace	43.7	470	@	nil	
	Offices - L3	267.90	2,884	@	50.00	144,186
	Offices - L2	414.00	4,456	@	50.00	222,819
	Offices - L1	414.40	4,461	@	50.00	223,034
	Offices - L0a	270.60	2,913	@	50.00	145,640
	Offices - L0b	70.00	753	@	50.00	37,675
	Reception	tbc		@	(assume multi let)	0
	Basement	30.00	323	@	nil	0
Existing NIA	<b>NIA</b>	1,396.90	<b>15,467</b>			<b>Total Rent Roll</b> 773,354
12,836	<b>Inc Reception</b>			Capitalised	@ 6.00% (NIY)	
						<b>Gross Development Value</b> 12,026,943
						psf 778
				Less Void	@ 12 months	773,354
				Less Rent Free	@ 12 months	773,354
<b>Professional Fees</b>						<b>1,546,708</b>
	Letting Agent Fee				10.00%	77,335
	Letting Legal Fee				1.50%	11,600
						<b>106,723</b>
						<b>Net Development Value</b> 10,373,512
						£psf: 671
<b>COSTS</b>						
<b>Current Value</b>						5,000,000
	SDLT			@	5.00%	N/A
	Agent's Fee			@	1.00%	N/A
	Solicitor's Fee			@	0.80%	N/A
						2,000
						<b>5,302,000</b>
<b>Refurbishment Construction:</b>						
	Demolition costs	Sq ft				inc
	Build Costs	18,898	sq ft GIA	@	250.00	psf
	Design Contingency			@	5%	
						4,724,500
						236,225
						<b>4,960,725</b>
<b>Description</b>						
	<b>Professional Fees:</b>					<b>Budget</b>
	Stirling Shaw	DM				141,643
	JaM Management	PM				38,220
	JaM Management	QS				57,050
	Wimshurst Pelleriti	Architect				140,194
	Axiom Structures	Structural				55,350
	Quinn Ross	M&E				58,650
	BREEAM (Quinn Ross)	Energy				0
	Principal designer					2,800
	Giles Dixon	Legals				40,000
	<b>Surveys:</b>					
	Various					5,000
	Quinn Ross	Drainage				1,850
	Waldrams Ltd	Rights of Light				3,800
	KP Acoustics	Acoustics				1,280
	Kronen	Transport				1,620
	Mobile CAD Survey					4,595
	Building regulations					9,250
	Planning Fee - WP					3,995
	CIL Fees					0
	<b>Other:</b>					
	Insurance					20,000
	Utilities for site during development					18,000
	L/L fixtures and fittings					20,000
	Fibre/Coms contractor					40,000
	<b>Total Forecast Project Costs</b>			13.40%		<b>664,692</b>
						<b>664,692</b>
<b>Disposal:</b>						
	Investment Sale Agent Fee			@		0
	Investment Sale Legal Fee			@		0
						<b>0</b>
<b>Finance:</b>						
	Finance	12 months		@	5.0%	Notional rate (60% of costs)
	Arrangement fee				1%	N/A
						<b>169,941</b>
<b>Total Build Costs &amp; Fees (excl. VAT)</b>						<b>5,795,358</b>
<b>Residual Value + Costs (excl. VAT)</b>						<b>11,097,358</b>
<b>GROSS PROFIT</b>						<b>-723,846</b>
Profit/Cost						-6.52%
Profit/Cost excluding notional finance						-4.99%

### Appendix 4 – Comparable Office Lettings Schedule (March 2020 – May 2023)

Address	Floor	Size (sf) Net	Rent Psf	Specification	Lease Term	Transaction	Date	Parties
Greyfriars Studio 25 The Quadrant	1 <sup>st</sup>	4,352	£53.50	- CAT A	5 years 12 <u>months</u> rent free ( <del>Yr</del> 1 half rent)	OML	April 23	L: <del>Carlford</del> T: <del>Galtea</del> Ass.
Greyfriars Studio 25 The Quadrant	2 <sup>nd</sup>	4,361	£52.50	- CAT A	5 years TOB @ 3 4 <u>months</u> rent free and 3 months post break	OML	June 22	L: <del>Carlford</del> T: <del>QIA</del> Global
Frameworks 2 Sheen Lane	2 <sup>nd</sup>	4,659 Terrace 242	£57.50 50% on terrace	- CAT A	5 years TOB @ 3 7 <u>months</u> rent free	OML	Jan 22	L: <del>Boulbee</del> Land T: <del>Metis</del>
Framework 2 Sheen Lane	4 <sup>th</sup>	2,641 Terrace 237	£60.00 50% on terrace	- CAT A	10 years TOB @ 5 7 <u>months</u> rent free	OML	April 22	L: <del>Boulbee</del> T: Park Run
Frameworks 2 Sheen Road	3 <sup>rd</sup>	4,345 Terrace 234	£57.50 50% on terrace	- CAT A	5 years TOB 3 7.5 <u>months</u> rent free	OML	<u>April 22</u>	L: <del>Boulbee</del> Land T: Clorox Company
Holbrook Studios	1 <sup>st</sup>	3,260	£50.00	- CAT A	5 <del>Yrs</del> TBO at 3 <sup>rd</sup> 15 <u>months</u> rent free (in total)	OML	October 21	LL: <del>CBRE</del> GI T: <del>Infinium</del>
63 Kew Road	G 1 <sup>st</sup>	15,050	£45.00	- <del>Unrefurbished</del>	2 years LBO after 12 months	OML/LR	August 2021	LL: Low Carbon Workplace T: Not on the High Street
Evergreen Studios	G	3,363	£55.00	- CAT A	5 years TBO @3 7 <u>months</u> rent free	OML	August 2021	LL: <del>Carlford</del> T: Respoke
1 Eton Street	3 <sup>rd</sup> 2 <sup>nd</sup>	7,218 11,034	£45.00	- CAT A	2 years 3 <u>months</u> rent free on 2 <sup>nd</sup> and 2 months on 3 <sup>rd</sup> .	OML/ LR	Dec 2020	LL: Europa T: <del>People</del> Against Dirty
25 Kew Foot Road	G 1 <sup>st</sup> 2 <sup>nd</sup>	7,632	£49.50	- Full Refurbished	15 years Break at 10 12 <u>months</u> rent free	OML	Oct 2020	LL: EDM T: Govt
Heron House	Whole (LGF, GF, 1 <sup>st</sup> & 2 <sup>nd</sup> )	3,133	£59.00	- Fully refurbished period	10 years TBO @ 3 <sup>rd</sup> ( <u>9 month</u> pen) and 5 <sup>th</sup> 6 <u>months</u> rent free	OML	March 2020	LL: Orchard Street T: Sotheby's

NOTES: all the above properties are located within the Draft Local Plan Town Centre Area, with the only exception being 25 Kew Foot Road, which is in a secondary /tertiary location.



## Appendix 5 – Lettings Board

From: Admin <[admin@signcraft.co.uk](mailto:admin@signcraft.co.uk)>  
Sent: 21 Aug 2020 15:04  
To: Andy Shaw <[ashaw@stirlingshaw.co.uk](mailto:ashaw@stirlingshaw.co.uk)>  
Subject: INDEPENDENCE HOUSE 84 LOWER MORTLAKE ROAD RICHMOND SURREY, TW9 2HS, SX4 V

Order Date 21/09/2020 Thank you for your order. Your order has been completed. Your Account Number is S507 Please use this when ordering by Email or on our Online ordering system @ :- <http://www.signcraft.co.uk/order-your-signage/>

Signcraft, The Coach House,  
St Stephens Road, Wes: Drayton,  
Middlesex, UB7 7RL  
T: 01895 442768  
[www.signcraft.co.uk](http://www.signcraft.co.uk)



Appendix 6 – Stirling Shaw Marketing Brochure



**Stirling Shaw**  
Real Estate Consultants

☎ 020 3105 2256



**Independence House, 84 Lower Mortlake Road,  
Richmond TW9 2HS**

**TO LET**

Area: 15,467 FT<sup>2</sup> (1,437M<sup>2</sup>) | Rent: Upon Application |



**Parking**  
37 onsite parking spaces



**Reception**  
Remodelled reception/lounge area



**Bike Rack**  
Secure bike storage



**Lift**  
Lift access

**LOCATION:**

Richmond is a highly affluent town located some 9 miles from Central London and has excellent road and rail links to both London via Underground, Overground and National Rail lines and Heathrow Airport via the M3 and M4 highways. The property occupies a prominent position on Lower Mortlake Road, at its junction with Crofton Terrace. Richmond Station, the town centre amenities and Old Deer Park are within a short walk, and all are accessible via a designated cycle route.

[www.stirlingshaw.co.uk](http://www.stirlingshaw.co.uk)

Misrepresentation Act 1967 – Stirling Shaw Ltd for themselves and for the vendors or lessors of this property, whose agents they are, give notice that: 1. The particulars are set out as a general outline only for the guidance of intended purchasers or lessees and do not constitute part of an offer or contract. 2. All descriptions, dimensions, reference to condition and necessary permissions for use and occupation, and other details are given without responsibility and any intending purchasers or lessees should not rely on them as statements or representations of fact but must satisfy themselves by inspection or otherwise as to the correctness of each of them. 3. No person in the employment of Stirling Shaw Ltd has any authority to make any representation or warranty whatsoever in relation to this property. Finance Act 1980 – Unless otherwise stated, all prices and rents are quoted exclusive of Value Added Tax (V.A.T.). Any intending purchasers or lessees must satisfy themselves independently as to the incidence of V.A.T. in respect of any transaction. 4. All information and correspondence is Subject To Contract.



## Independence House, 84 Lower Mortlake Road, Richmond TW9 2HS

### DESCRIPTION:

The property is due to undergo a comprehensive refurbishment programme to include remodelled entrance with reception/lounge area, with self contained Grade A office suites accessed from a central lift core.

The 3rd floor will comprise full height glazing with stunning panoramic views and access to the roof terrace. The building will benefit from an additional terrace to the rear as well as a secure bike store, changing facilities and 37 onsite parking spaces.

### FLOOR AREA:

FLOOR	AREA SQFT	AREA SQM
Ground Suite A	2,913	271
Ground Suite B	753	70
First Floor	4,461	414
Second Floor	4,456	414
Third Floor	2,884	268
<b>TOTAL</b>	<b>15,467 sqft</b>	<b>1,437 sqm</b>

### AMENITIES:

- PRELIMINARY MARKETING
- FULLY REMODELLED GRADE A+ OFFICES
- STATE OF THE ART CHANGING FACILITIES
- POTENTIAL HEAD QUARTER BUILDING
- THREE EXTERNAL TERRACES
- SECURE BIKE STORAGE + 27 CAR SPACES

### LEASE:

New Lease. Terms to be agreed

**RENT:** Upon Application

**VAT:** VAT will be applicable

**SERVICE CHARGE:** TBC

**RATES PAYABLE:** To be assessed

**EPC:** Available upon request.

**LEGAL COSTS:** Each party to be responsible for their own legal costs.

### CONTACT:



**Andy Shaw**  
 07498 854767  
 ashaw@stirlingshaw.co.uk



**Julius de Mattos**  
 07969 395767  
 jdemattos@stirlingshaw.co.uk

[www.stirlingshaw.co.uk](http://www.stirlingshaw.co.uk)

Misrepresentation Act 1967 – Stirling Shaw Ltd for themselves and for the vendors or lessors of this property, whose agents they are, give notice that: 1. The particulars are set out as a general outline only for the guidance of intended purchasers or lessees and do not constitute part of an offer or contract. 2. All descriptions, dimensions, references to condition and necessary permissions for use and occupation, and other details are given without responsibility and any intending purchasers or lessees should not rely on them as statements or representations of fact but must satisfy themselves by inspection or otherwise as to the correctness of each of them. 3. No person in the employment of Stirling Shaw Ltd has any authority to make any representation or warranty whatsoever in relation to this property. Finance Act 1990 – Unless otherwise stated, all prices and rents are quoted exclusive of Value Added Tax (V.A.T.). Any intending purchasers or lessees must satisfy themselves independently as to the incidence of V.A.T. in respect of any transaction. 4. All information and correspondence is Subject To Contract.

**Appendix 7 – Confirmation of advertising with Estate Agents Clearing House (EACH)**

Stirling Shaw 07843 511 820 Investment 57 Lock Road,Ham,TW10 7LL




Julius de Mattos

□ TW9
 Richmond
84, Independence House
15,467 sf



Office

220615132642  
UNVERIFIED  
Available

**Office**

□ TW9
15,467 sf
**Stirling Shaw**

📍 84, Independence House
Lease £ROA
Ham

➔ Lower Mortlake Road
write occupier / reference
07843 511 820

📍 **Richmond**
set Office Amenities
 Julius de Mattos

PRELIMINARY MARKETING
POTENTIAL HEAD
QUARTER BUILDING
FULLY REMODELLED
GRADE A+ OFFICES
THREE EXTERNAL TERRACES

**Description**

Richmond is a highly affluent town located some 9 miles from Central London and has excellent road and rail links to both London via Underground, Overground and National Rail lines and Heathrow Airport via the M3 and M4 highways. The property occupies a prominent position on Lower Mortlake Road, at its junction with Crofton Terrace. Richmond Station, the town centre amenities and Old Deer Park are within a short walk, and all are accessible via a designated cycle route. The property is due to undergo a comprehensive refurbishment programme to include remodelled

**Location** write / paste

write a note - visible for Department








## Appendix 7A – Confirmation of advertising with Estates Gazette Interactive (EGi)

### Agents Portal: Public Portal:

**Propertylink** You are managing Stirling Shaw

Back to Propertylink | jdemittas@stirlingshaw.co.uk

**Your Adverts** Search My favourites

Showing 1-3 out of 3 results

- Independence House**  
Created 2 minutes ago. Owned by Stirling Shaw  
The property is due to undergo a comprehensive refurbishment programme to include remodelled entrance with reception/lounge area, with self contained Grade A office suites accessed from a central lift core. The 3rd floor will comprise full height glazing with...  
Office Offices

**Propertylink** Find a property Find a service Sign in

To rent Richmond Create search alert Most recent

31 offices for rent in Richmond, Surrey

TO RENT	SIZE	TO RENT	SIZE	TO RENT	SIZE	FOR SALE / TO RENT	SIZE
ROA	15,467 Sq Ft	ROA	1,601 - 5,829 Sq Ft	£35,000.00	650 Sq Ft	For sale: POA To rent: ROA	544 Sq Ft
<b>ADDRESS</b>	<b>TYPE</b>	<b>ADDRESS</b>	<b>TYPE</b>	<b>ADDRESS</b>	<b>TYPE</b>	<b>ADDRESS</b>	<b>TYPE</b>
Independence House, 84 Lower Mortlake Road...	Office, Offices	Vectra House, 35 Paradise Road, Richmond upon...	Office, Offices	Ground Floor Suite, Holbrooke House, 24-36 Hill Rise...	Office, Offices	Times Court, Retreat Road, Richmond	Offices, Office

## Appendix 7B – Confirmation of Advertising with Agents Society

**Agents Society**

Independence House, 84 Lower Mortlake Road, Richmond

Summary Interest Schedule Find Matches Insights **New** Management Transactions Availability Media Marketing

**Independence House**  
Richmond, TW9 2HS

2,884 - 15,467 sqft - To Let - Office  
Created: 16/08/2020 - Updated 17/05/2022

COMING SOON Quick Look

### Appendix 7C – Confirmation of Advertising with LoopNet (CoStar)



Independence House | 84 Lower Mortlake Rd  
15,467 SF of Office Space Available in Richmond, LND

**HIGHLIGHTS**

- Three external terraces
- Secure bike storage
- Some of the city changing facilities

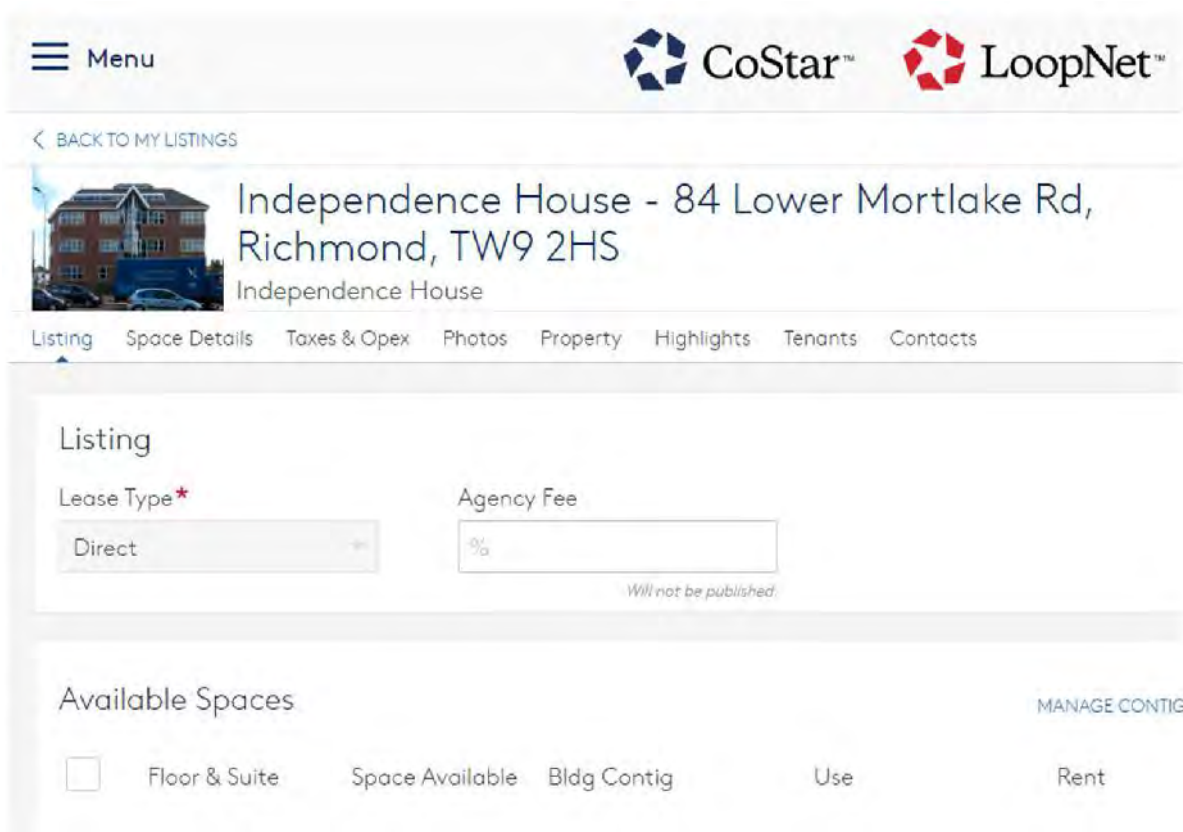
**ALL AVAILABLE SPACES (4)**


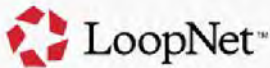
SPACE	SIZE	TERM	RENT	SPACE USE	CONDITION	AVAILABLE
Ground	753.3666 SF	1-20 Years	Upon Application	Office	Shell Space	Now
1st Floor	4,461 SF	1-20 Years	Upon Application	Office	Shell Space	Now
2nd Floor	4,456 SF	1-20 Years	Upon Application	Office	Shell Space	Now
3rd Floor	3,884 SF	1-20 Years	Upon Application	Office	Shell Space	Now

**PROPERTY OVERVIEW**  
The property is due to undergo a comprehensive refurbishment... panoramic views and access to the roof terrace. The building...


Julius De Mattos  
Andy Shaw  
Stirling Shaw  
07969 395767  
7BC,  
Richmond, TW9 7LL  
[Contact](#)

### Public Portal:



Menu  

[BACK TO MY LISTINGS](#)

 Independence House - 84 Lower Mortlake Rd,  
Richmond, TW9 2HS  
Independence House

Listing Space Details Taxes & Opex Photos Property Highlights Tenants Contacts

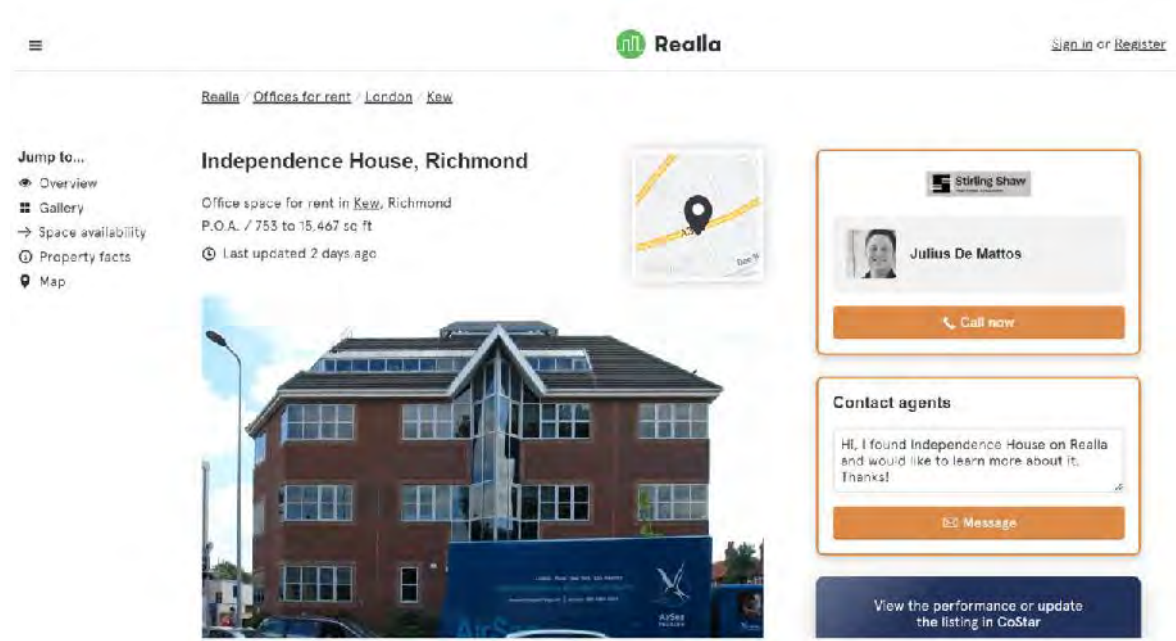
**Listing**

Lease Type\*  Agency Fee   
*Will not be published.*

**Available Spaces** [MANAGE CONTIG](#)

Floor & Suite  Space Available  Bldg Contig  Use  Rent

Appendix 7D – Confirmation of Advertising with Realla:

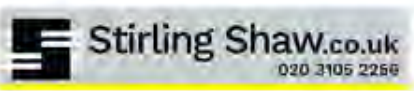


The screenshot shows a Realla listing for 'Independence House, Richmond'. It includes a navigation menu on the left, a main image of the building, and a sidebar with contact options for agent Julius De Mattos. The listing details include 'Office space for rent in Kew, Richmond' and 'P.O.A. / 753 to 15,467 sq ft'.

Appendix 8 - Schedule of Interested Parties

# Independence House, Richmond

Enquiries June 2023



CURRENT AVAILABILITY	QUOTING RENT /SQ FT	RATES / SQ FT	SERVICE CHARGE / SQ FT
L0 - 3,663 Sq Ft L1 - 4,461 L2 - 4,456 L3 - 2,884 <b>TOTAL: 15,464 SQ FT</b>	£50.00 <del>psf</del>	Awaiting assessment Estimated £15.00 <del>psf</del>	Awaiting SC budget. Targeting £7.50 per sq ft max

DATE	APPLICANT	SIZE SQ FT	LOCATION	COMMENTS:
<b>VIEWINGS</b>				
May 2021	TCC Global	15,000	Richmond	Tenant relocating from Heathrow. Required 15,000 sqft offices for new HQ. Undertook 7 viewings. Full proposal issued at £50 psf, subject to final spec being agreed. Tenant finally elected not to pursue as the building was not central to Richmond's amenities.
Sept 2021	The Golf Rooms	7,500	Richmond	Viewed 23 <sup>rd</sup> Sept: initial interest but elected to pursue Greyfriars Studio as closer to tube station
<b>OFFERS</b>				
	None			



**PREVIOUS ENQUIRIES**

May 2022	KLM obo confidential client	7 – 20,000 sqft	Richmond	Serviced Office operators - Management Agreements only
May 2022	Peoplecheck	3,500	Richmond	Currently in Shearwater House (2,000 sq ft) – lease expiry Nov 2023. Interested in 1 <sup>st</sup> Floor but at £50 psf and looking at cheaper options in the town. Made offer for Evergreen Studio
Sept 2022	Compass Box Whiskey	3,000 – 4,000	Richmond and surrounds	Chiswick based whiskey co. Three part requirement; distillery area, tasting area, office. Rejected IH and moved to Chiswick
May 2022	Orange Square	3,200	Richmond	Stayed at Peregrine House and considering moving closer to central London
Nov 2022	Nursery	5,000	Richmond	Reviewed but discounted due to lack of secure external play area. UO on 1-9 Sandvcombe Road, Kew
Oct 2022	Devoia	4,000	Richmond	Reviewed but discounted due to location. Want central Richmond
July 2022	Blackboard Inc	7,500	Richmond	Reviewed but discounted due to location. Want central Richmond
Mar 2023	IW Group Services	5,000	Richmond	Reviewed – no further interest
Jan 2023	Urban Consulting Ltd	3,500	Richmond	Reviewed - no further interest



Celebrating  
**60**  
years

Independence House, 84 Lower  
Mortlake Road, Richmond  
Employment Evidence

Final Report

William Grant & Sons Ltd

19 July 2023

**LICHFIELDS**

**LICHFIELDS**

# **Lichfields is the pre-eminent planning and development consultancy in the UK**

**Celebrating 60 years  
of innovation in planning.**

**[lichfields.uk](https://www.lichfields.uk)**

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	Purpose	3
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## 1.0 Introduction

- 1.1 William Grant & Sons Ltd commissioned Lichfields to prepare evidence to accompany representations to the London Borough of Richmond (**‘LB Richmond’**) Publication Draft Local Plan (Regulation 19) Consultation, in relation to seeking the exclusion of **Independence House, 84 Lower Mortlake Road, Richmond TW9 2HS** (**‘the site’**) from a proposed Key Business Area.

## Site Policy Context

### Adopted Local Plan

- 1.2 The site currently comprises a vacant 4-storey office building totalling c.1,400 sq.m. It is located within **the ‘72-84 Lower Mortlake Road, Richmond’** Key Office Area (Policy LP 41, Adopted Local Plan 2018), alongside the adjacent Avalon House and Eminence House, although the latter is converted to a residential building. The site is also subject to an Article **4 Direction (with reference ‘Site 37’) which also covers Avalon House** and which came into force in July 2022.
- 1.3 The policy position in the Adopted Local Plan<sup>1</sup> is that in Key Office Areas the quantum of existing office space will be either retained or enhanced. It is stated in the justification of Policy LP 41 that:

*“The Council will not permit loss of office space in these areas and development of new office space is encouraged. Proposals for redevelopment of employment sites or mixed-use schemes will be required to contribute to a net increase in office floorspace”.*

### Publication Draft Local Plan

- 1.4 The emerging policy as set out in the Publication Draft Local Plan<sup>2</sup> carries forward the restriction of no loss of office space. In particular, ‘Policy 23 Offices’ states under point A **‘Retention of Offices’** that:

*“There is a presumption against the loss of office floorspace in all parts of the borough. Proposals which result in a net loss of office floorspace will be refused...”*

- 1.5 Of note, the same policy also renames the **‘Key Office Areas’** to **‘Key Business Areas’**.

- 1.6 Justification paragraph 19.19 states that proposals that involve a change of use not supported by Policy 23 will require satisfactory marketing evidence. Planning application submissions should set out the reasons why the site is not suitable for continued commercial, business or service uses.

- 1.7 **Paragraph 19.24 states that it is the Council’s intention to continue to enforce** the existing Article 4 Direction to require the application route for change of use involving loss of office within specific areas, including **‘72-84 Lower Mortlake Road, Richmond’** (i.e. covering the site).

---

<sup>1</sup> London Borough of Richmond upon Thames Local Plan, adopted July 2018  
([https://www.richmond.gov.uk/media/15935/adopted\\_local\\_plan\\_interim.pdf](https://www.richmond.gov.uk/media/15935/adopted_local_plan_interim.pdf))

<sup>2</sup> [https://www.richmond.gov.uk/media/fomccpcf/publication\\_local\\_plan\\_low\\_resolution.pdf](https://www.richmond.gov.uk/media/fomccpcf/publication_local_plan_low_resolution.pdf)



- 1.8 This proposed policy position is also set out in ‘Policy 21 Protecting the Local Economy’ (Strategic Policy) and in particular within point A1 that states new developments will be supported where they protect existing office space with a no net loss approach, and point A2 which directs major employment development within the designated Key Business Areas.
- 1.9 Paragraph 19.4 discusses the changes in working styles and their impacts on employment floorspace and states that this trend “*may reduce the extent to which new jobs need additional dedicated office floorspace* [emphasis added], *however the long-term impacts remain uncertain and there is a need to plan for economic recovery*”.
- 1.10 Finally, Appendix 2 paragraph 28.9 sets out the marketing requirements that should accompany any proposals that relate to loss of office space. These include:
- Evidence that the site has been marketed for the existing office use and other types of office-based uses such as flexible, start-up or co-working space (for a proposed period of a minimum 2 years based on Table 28.1);
  - Offices should be marketed at a price commensurate with their existing quality or condition;
  - The lease term should not be unduly restrictive; and
  - Alternatively, the potential of upgrading the building or adapting the building to meet modern workspace requirements should be explored.

## Purpose

- 1.11 In view of the Local Plan Consultation and forthcoming Local Plan submission, this report reviews the **Council’s** employment land evidence presented within the [2021 Employment Land and Premises Needs Assessment](#) (‘2021 ELPNA’) and the [2023 Update](#), and adds to this by providing an updated position in relation to office demand and requirements based on an analysis of the latest market signals (at May/June 2023).
- 1.12 In addition, the report considers the findings of the [2015 Assessment of Office Stock in Richmond upon Thames](#) that informed the initial Article 4 Direction following the **introduction of permitted development rights in 2013 and comprises the Council’s latest available audit of the Borough’s stock of office accommodation.**
- 1.13 The evidence presented herein also reviews the supply analysis presented in the [2013 Richmond Employment Sites and Premises Study](#) as this **constitutes the latest ‘complete’** employment evidence (i.e. covering both demand and supply), which all of the subsequent studies (including the 2021 ELPNA and 2023 Update) effectively seek to update elements of.
- 1.14 The analysis is then drawn together to present the latest office demand/supply balance position to justify that the exclusion of Independence House from being designated as a Key Office Area/Key Business Area, and associated loss of office floorspace, would have no material impact on the balance for office space across the Borough in both quantitative and qualitative terms.

## Structure of the Report

1.15

The remainder of this report is structured as follows:

- [Employment evidence review \(Section 2.0\)](#): provides a critique of the latest employment land needs assessment in relation to future office requirements in the Borough.
- [Review of office supply \(Section 3.0\)](#): reviews all of the **Council's** employment land evidence in relation to the supply of office stock to understand the quantum and quality of the future supply as well as to review the rationale for designating the site as a Key Office Area/Key Business Area, and if this is still valid. Following this, an updated office demand and supply balance is presented demonstrating that sufficient supply is available to accommodate future office requirements across the Local Plan period.
- [Role and contribution of Independence House \(Section 4.0\)](#): summarises key findings from the accompanying Marketing Report regarding the role and contribution that Independence House plays in the local office market.
- Overall [conclusions](#) are presented in [Section 5.0](#).

## 2.0 Review of employment evidence

2.1 This section reviews the **Council's latest** evidence on office needs and requirements as presented within the [2021 Employment Land and Premises Needs Assessment \('2021 ELPNA'\)](#) and the [2023 Update](#). In particular, it considers the robustness and soundness of the approach **undertaken by the Council's evidence, alongside the suitability of the data** that informs it. It also considers the interpretation of the evidence including both the modelling **findings and the market signals insofar as these have informed the ELPNA's conclusions** and recommendations in relation to office needs.

### Employment Land and Premises Needs Assessment 2021

2.2 The 2021 ELPNA considered different approaches to quantifying employment land needs over the 2019 to 2039 Local Plan period. In overall terms the approach was aligned with the National Planning Policy framework (NPPF) and Planning Practice Guidance (PPG) in relation to assessing economic needs, however it lacked consideration of more qualitative factors and drivers of demand, and in particular longer term implications of the economic climate that was evolving during the Covid-19 pandemic.

2.3 The key findings from the 2021 assessment are summarised as follows:

- 1 **The past trends scenario was "very negative" resulting in a** negative requirement of -136,140 sq.m when assessing the 11-year monitoring data (2010/11 to 2020/21) and -73,240 sq.m when considering a 4-year period of 2015/16 to 2018/19. It is not clear why the 4-year period was considered, but in any case, the outcomes of this approach were considered contrary to market sentiment, which was showing signs of positivity, and for that reason this scenario was set aside from further consideration.
- 2 The evidence presented two labour demand scenarios, of which the first was based on Experian (April 2021 release) and the second on the former GLA projections dated 2017. Based on Experian, there was office job growth of 130 jobs per annum (pa) for the 2019-39 period. By utilising a density of 12 sq.m NIA per job and adding an 8.1% vacancy rate, that growth was translated to 46,370 sq.m GIA office requirement (net). This was then increased to 92,300 sq.m to factor in anticipated future employment losses for the same plan period (totalling 45,940 sq.m). Against the identified supply of 19,590 sq.m of office space, *the remaining shortfall of 72,720 sq.m was proposed as the minimum office requirement.*
- 3 The GLA projections for the period 2016-41 projected 545 additional office jobs pa, and by adopting the same approach as in the previous labour demand scenario, it generated a requirement for 199,400 sq.m of office floorspace to 2039. It should be noted that apart from being dated, that GLA projection covered a different time period.

2.4 The 2021 ELPNA recommended as a minimum, a residual need figure of 72,720 sq.m, and suggested that if sites/supply were to become available, the Council should seek to **accommodate the GLA's higher need figure of 199,400 sq.m. However, following that recommendation, the evidence states in para 7.23:**

*"Even the low Experian number will be challenging in the current climate. Pre-Covid the office market struggled to deliver significant volumes of new space. It is unclear whether space lost to PDR will ever be replaced or has now been lost permanently to*

*homeworking* [emphasis added]. *But it is still important that the Borough plans positively and with a tight occupier market any increase in demand has little supply side response without the new plan proactively seeking new capacity. Also, as noted in the market review, new office products may emerge over the plan period as workers change their behaviour. This may drive a demand for new flexible offices close to where workers **live and as an alternative to homeworking.***”

- 2.5 Whilst this approach was broadly aligned with the guidelines of PPG in estimating economic needs, *the study recommendations do not appear to properly reflect the market activity/signals evidence available at the time of preparation, in particular the performance of the economy since the pandemic.*
- 2.6 For instance, although the evidence acknowledged that the minimum recommended office requirement represented a 20% increase on existing office stock (as at 2021), and while it was prepared during the pandemic, it still recommended that the Council should consider planning for an even higher requirement (if sites were to become available) which given the wider economic climate as well as data on past completions, was unsound and not justified by evidence. Indeed, the study acknowledged at **paragraph 4.97** that *“Obviously, any office assessment has an unusually high level of uncertainty... Even pre-Covid the Borough struggled to deliver net additional office space and currently struggles for viability”* [emphasis added].

## **Employment Land and Premises Needs Assessment 2023 Update**

- 2.7 Since the 2021 ELPNA was prepared and published, there has been significant macro-economic change and resulting shifts in employment policy to reflect the aftermath of the Covid-19 pandemic, the cost-of-living crisis, the new Use Class Order and its impact on town centres and the local economy. Economic forecasts utilised in the 2021 evidence would be considered out-of-date by the time of Local Plan Examination, and the Council introduced a Class E Article 4 Direction in July 2022 aiming to resist losses of office space.
- 2.8 In this context, the 2023 ELPNA Update (published in April 2023) provides new estimates of office and industrial requirements for LB Richmond based on a December 2022 Experian forecast, and these are also compared with the latest GLA employment projections published in October 2022. This comparison indicates that the future projections are broadly aligned, but with Experian anticipating a more positive growth trajectory with a difference of +4,000 workforce jobs to 2041 (c +4%). Given that **the GLA’s forecast does not** provide a sectoral breakdown of job growth at a local/borough level, it has not been considered in any detail by the 2023 Update.
- 2.9 The Experian forecast expects office jobs to grow by an average of 199 per annum for the 2019-39 period, driven by anticipated growth in professional services sectors. A density ratio of 12 sq.m per job is utilised as well as a vacancy rate of 8.1%, which is broadly consistent with the 2021 ELPNA.
- 2.10 **However, the approach to translating ‘net’ employment requirements to ‘gross’ planning requirements in the 2023 Update has been amended significantly compared with the approach taken by the 2021 ELPNA, and now appears to better reflect the nature of office market activity across the Borough and outer London more broadly.**



- 2.11 Most notably, an additional ‘stock vacancy adjustment’ is introduced in the 2023 Update, which essentially considers the relatively high levels of office space vacancy in Richmond and how this should be factored into calculations of future need with the aim of supporting a commercially functional market. The evidence reported an office vacancy rate of 16.7%<sup>3</sup> which reflected an increase of 11.7% since the 2021 ELPNA was undertaken. This vacant office stock is deducted from the initial office requirement up to a level to reach the optimum vacancy rate of 7.5% (equivalent to a total of 20,882 sq.m vacant office stock being deducted). This approach results in a net office requirement of 36,140 sq.m. The principle of this stock vacancy adjustment appears reasonable in light of the high office **vacancy that currently exists across the Borough’s office market.**
- 2.12 The second key change in the approach is that there is no further allowance for replacing future losses of employment floorspace. This is a correction to the 2021 ELPNA which factored in losses at Teddington Studios that were lost some years before the evidence was prepared. Monitoring data suggests that future losses could total 11,843 sq.m.
- 2.13 Overall, the updated method results in an office floorspace need figure of 36,140 sq.m over the study period to 2041. When compared against an identified pipeline supply of 13,280 sq.m office space (which is discussed in further detail in the following section), the evidence concludes that the Local Plan should accommodate a residual office space requirement of 22,860 sq.m. The scale of this requirement is 68.5% lower than recommended by the 2021 ELPNA and appears to reflect the more limited growth prospects for office-based activity in the Borough over the coming years.
- 2.14 It also aligns with past trend analysis included within the 2023 evidence which shows that the Borough has continued to lose office floorspace over recent years, and which indicates that the adopted Policy LP 41 has been ineffective at preventing this. More than 136,000 sq.m office floorspace has been lost between 2010/11 and 2021/22 according to the 2023 Update (Appendix A).
- 2.15 The 2023 Update notes that office space vacancy has increased significantly over the last few years and since 2020 in particular, and notes at paragraph 3.96 that there is currently more vacant office stock than is required for an efficiently operating property market. The report suggests that a key reason for this could relate to the demographics of the Borough which are particularly favourable to home-working; *“high resident wages may also facilitate homeworking more readily, coupled with high cost of office space in the Borough making it less attractive to hold office space compared to home working”*. It also suggests that the **Borough’s** remaining office stock is likely to prove harder to convert to residential via PDR or planning due to the changes in building standards that have increased development costs.
- 2.16 The evidence concludes in paragraphs 3.84 and 3.85 that: *“this set of circumstances present a new policy dilemma for the Council and requires a change in approach for the employment land evidence. The 2021 ELPNA treated the spike in availability with care, and did not treat it as a robust indicator of the market that we would use to develop **planning policy.** There was a hope that the ‘new normal’ would include a return to offices – albeit maybe not to the same extent as before. So, for example, we looked to replace all recent office floorspace losses on the grounds that they had not been lost through any*

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<sup>3</sup> Based on CoStar (2023)

*economic rationale, but through PDR or very short-term market signals*". This explains the updated approach that has been taken in the 2023 Update.

- 2.17 Paragraph 3.97 goes on to highlight that, *"With 21,000 sq m of 'surplus' office floorspace (ie the quantum above the 7.5% market optimum), which at recent office floorspace development rates (around 4,000 sq.m per annum) would take the market around five years to absorb. Thus, in the short-term the efficient operation of the office market in the Borough would not be affected if some of that floorspace was lost* [emphasis added]."
- 2.18 In reality, net rates of office development have been negative in recent years, so it could be argued that it would take the local market much longer than five years to absorb this high level of vacant space.
- 2.19 At paragraph 3.98, the 2023 Update suggests that until the vacancy rate falls below 10%, *"losses can essentially be allowed and after that equilibrium is reached then the development management approach would need to be more restrictive"*.
- 2.20 It is also stated in para 3.99 that *"with so much short-term availability, it would not be pragmatic to refuse Change of Use or redevelopment for comprehensive proposals where available space can be re-provided"* [emphasis added].
- 2.21 This policy recommendation, however, only applies to *"traditional office stock outside of the Borough centres/ areas covered by A4Ds"* which presumably also covers Key Office Areas/Key Business Areas. **This recommendation is not justified by the Council's evidence** as the evidence does not include an up-to-date appraisal of the role and performance of the **Borough's Key Office Areas/Key Business Areas**. Indeed, those that have been underperforming (such as Independence House/72-84 Lower Mortlake Road, Richmond) represent strong candidates for redevelopment and a priority for managed loss of office floorspace over the short/immediate term, in line with 2023 ELPNA recommendations.
- 2.22 Finally, with regards to policy recommendations the evidence suggests that in terms of new provision going forward across the plan period, the majority of demand is for small scale subdivided office units, and on this basis, major mixed-use developments provide the most realistic opportunity to provide for this type of space.
- 2.23 To conclude, the emerging Local Plan Policy 23 which maintains a **strict 'no net loss of office floorspace' position, is no longer justified by the Council's latest economic evidence** which points to a significant oversupply of office floorspace across the Borough alongside a declining requirement for office space over the new Local Plan period. Indeed, the evidence points to some loss of office space being required to help the market reach equilibrium and be able to function more effectively. A more flexible and pragmatic approach is therefore required through proposed Policy 23 in order to respond to the significant over-supply of functionally redundant office space that exists across **the Borough's office market and to** more effectively encourage provision of high quality accommodation that better meets the needs of local businesses.

## Summary

2.24 The key points from our review of the latest employment evidence in relation to office needs across LB Richmond are summarised as follows:

- 1 The 2021 ELPNA identified a relatively high requirement for office space in Richmond which did not appear to reflect prevailing economic trends and office market activity at the time the study was prepared. Recommendations were strongly caveated to reflect the high level of uncertainty that existed at the time, and acknowledged that even pre-Covid the Borough had been struggling to deliver net additional office space and faced significant viability challenges.
- 2 In view of this, a 2023 Update has been prepared which presents an amended methodological approach to estimating future office requirements alongside considering more recent econometric forecasts. The updated approach appears to be more pragmatic and reflective of current/recent office market activity across Richmond and outer London locations more generally. It identifies a residual requirement for 22,860 sq.m of office space over the study period to 2041, which is significantly lower in scale than that identified by the earlier 2021 study. It also suggests that major mixed-use developments provide the most realistic opportunity to accommodate the type of office space sought by local businesses (i.e. small scale subdivided office units).
- 3 The 2023 Update provides a detailed analysis and discussion of office space vacancy across the Borough, and how the high levels of vacancy that currently characterise the market should be reflected in planning policy in the context of encouraging equilibrium and optimum market conditions. It recommends a notable change in approach, concluding that the short-term efficient operation of the office market in the Borough would not be affected if some of **the Borough's existing vacant** floorspace was lost; until the vacancy rate falls below 10% (it currently stands at 16.7%), losses can essentially be allowed. Indeed, within its calculations, the 2023 study effectively assumes that **21,000 sq.m of currently vacant/surplus office space is lost from the Borough's portfolio in the short term.**
- 4 Despite this definitive conclusion presented in the 2023 ELPNA Update, **the Council's** proposed approach through the **emerging Local Plan is to maintain its strict 'no net loss of office floorspace' policy which features in the adopted Local Plan but has proved to** be wholly ineffective over recent years, with the overall stock of office space gradually declining. This approach is no longer **justified by the Council's** own latest employment evidence and therefore cannot be considered sound.

## 3.0 Review of office supply

3.1 This section reviews the latest office supply position in LB Richmond and considers the rationale for designating the Independence House site as a Key Business Area, and whether this still remains valid.

3.2 It then compares this identified future/pipeline supply against the latest office requirement for LB Richmond summarised in the previous section to demonstrate that there is sufficient supply available to accommodate future office needs in the Borough across the Local Plan period in both quantitative and qualitative terms.

### Office Supply Review and the Independence House Designation

3.3 The proposal site was first reviewed within the [2013 Richmond Employment Sites and Premises Study](#) (published in March 2013) as part of the office stock within the ‘Richmond Fringe’ area. In particular, it was stated (in paragraph 6.19) that on Lower Mortlake Road there was a small cluster of offices housing William Grant & Sons in Independence House, and Endeca, Celerant, ION and Tourwise in Avalon House.

3.4 It was then suggested in paragraph 6.20 that:

*“any site in this area is likely to be vulnerable to pressure for residential conversion. But many such locations offer reasonable quality marginal space of the sort liked by smaller local companies where cost is a critical factor”.*

3.5 On this basis, that evidence concluded that the Richmond Fringe area’s offer provides a diverse offering with both Grade A as well as affordable office space, and it has a number of well-located sites that should be prioritised in policy terms given that the office market demand was strong when that evidence was prepared in late 2012 and early 2013.

3.6 Following the national introduction of permitted development rights in Spring 2013, the Borough introduced an [Article 4 Direction in November 2014](#) (‘A4D’) to protect 10 main office areas. The proposal site was not included within these A4D designations.

3.7 In August 2015, the Borough published the Assessment of [Office Stock in Richmond upon Thames](#) aiming to inform a new A4D as well as emerging planning policy at that time (this was eventually adopted in 2018). In that context, the 2015 evidence provided a high-level assessment of the ‘Lower Mortlake Road cluster’ and suggested that the area should be protected through an A4D. In particular, it was suggested that those office buildings that had not yet been subject to a prior approval (including Independence House with reference LMR2) were relatively modern and of high-quality stock which should be protected. The assessment was undertaken at a high level, based primarily on the occupation rates of the buildings and their condition at the time.

3.8 As a result, the Borough introduced a new [Article 4 Direction in July 2016](#) to remove permitted development rights for change of use from office to residential within various office areas including the proposal site. In addition, Independence House was designated as a **‘Key Office Area’** in the Local Plan Review 2015-2018 (adopted in July 2018) and since then it has been subject to LP Policy 41 (paragraph 1.3). Most recently, in July 2022, the site



was also subject of the latest [Modification of Article 4 Direction](#) (Site 37) which continued to protect the proposal site from change of use to residential. Through this modification the Secretary of State removed protection from 5 sites that had already granted permission to residential. Apart from that, there was no further evidence review undertaken by the Council of the **Borough's** office stock or market signals to inform the 2022 A4D.

- 3.9 Synthesising the above, the Publication Draft Local Plan has taken forward a legacy designation in relation to Independence House that, as an office premises, was last objectively assessed in 2015 – some eight years ago – when the office market was relatively strong in Richmond. Since then, the market has undergone significant structural change and the building has been vacant for the last 3 years despite an active marketing strategy that has sought to re-occupy the building. These changes do not appear to be reflected **within the Council's proposed Local Plan policy which** seeks to roll forward an historic policy designation without appropriate, up-to-date supporting evidence.

## Future Office Supply

- 3.10 For the purposes of our analysis, the future pipeline of office supply in LB Richmond comprises a number of different sources, including:

- 1 Extant (unimplemented) planning permissions;
- 2 Emerging Local Plan allocations; and
- 3 Potentially other opportunities for providing new office space such as through the new Use Class Order and E Class flexibility combined with decreasing retail space in town centres.

- 3.11 Each of these sources of supply are discussed in turn below. This represents a more comprehensive and realistic view of future office supply than considered by the 2023 ELPNA which looked only at extant/unimplemented planning permissions and therefore significantly underestimates the overall scale of supply that could be available to meet office needs over the plan period.

### Extant Permissions

- 3.12 Based on the latest employment evidence (i.e. the 2023 ELPNA Update, Table 3.16), there is a total of 13,280 sq.m of office space associated with extant/as yet unimplemented planning permissions.

### Emerging Local Plan Allocations

- 3.13 The 2023 ELPNA Update does not consider any emerging allocations within its analysis of office supply, but does indicate that office needs tend to relate to smaller-size office units with mixed-use developments offering the most realistic prospects of bringing forward such supply over the Plan period.
- 3.14 In this context, the Publication Draft Local Plan proposes that a number of site allocations could bring forward some element of new office provision (utilising terms such as 'space for local businesses', 'office', 'commercial space' or **'employment uses'**) alongside wider uses, across 19 mixed use allocations totalling just under 50 ha, as summarised in the table overleaf.

Table 3.1 Publication Draft Local Plan - Mixed Use Allocations that include Office Provision

Ref	Site Name	Existing Use(s)	Proposed Use(s)	Site Area (ha)
1	Hampton Square	Mix of commercial, community, social and residential uses	Mixed incl uses for local businesses	2.85
2	Platts Eyot	Business and employment uses including office, recording studios and river-related uses	Mixed incl uses for local businesses and river-related businesses	3.77
3	Hampton Traffic Unit, 60-68 Station Road	Former Police Station	Business, employment generating and other commercial or community and infrastructure uses	0.28
5	Hampton Telephone Exchange	Telephone exchange (sui generis) and associated office use	Mixed - employment, commercial or community uses and residential in upper floors and to the rear	0.13
6	Telephone Exchange	Telephone exchange (sui generis) and associated office use	Commercial, retail, office, other commercial uses and housing in the upper floors	0.17
7	Teddington Delivery Office	Royal Mail sorting office (sui generis)	Commercial, retail, office, other commercial uses and housing in the upper floors	0.06
13	Twickenham Stadium (Rugby Football Union)	National sporting stadium	Sports and Hospitality, caveating at bullet point 5 that "there is a general need for new office floorspace in the borough. In the event of an area of the site being declared surplus to requirements, the opportunity to provide for employment floorspace, such as offices, a business park or other commercial uses, should be firstly explored".	12.62
16	Twickenham Telephone Exchange	Telephone exchange (sui generis) and associated office space	Mixed-use scheme, comprising commercial / retail and residential	0.18

Ref	Site Name	Existing Use(s)	Proposed Use(s)	Site Area (ha)
17	Twickenham Riverside and Water Lane/King Street TW1 3SD/3DX	Mixed TC site - including commercial and retail uses	Mixed residential and due to its town centre location, the site could accommodate a range of commercial uses, including retail, office, cafes, restaurant/public house or hotel	1.06
18	Homebase, Twickenham Road	Retail	Resi-led mixed with offices and other commercial uses	1.5
20	Telephone Exchange, Ashdale Close	Telephone exchange (sui generis) and associated office space	Employment (such as offices) and social infrastructure or other appropriate main centre uses	0.14
21	Kneller Hall	Formerly home of the Royal Military School of Music	Resi-led mixed with educational, employment / offices and social infrastructure uses	9.72
25	Richmond Station	Railway Station (sui generis) and associated uses	Comprehensive redevelopment opportunity to provide an improved transport interchange, public realm and an appropriate mix of town centre uses. Appropriate uses include a mix of commercial and community uses, to include retail, offices/workspace and leisure/community use, together with residential on upper floors	1.96
26	Former House of Fraser	Retail	Mixed including retail, offices and leisure/community use (note: already subject to extant permission so not included in this assessment)	-
29	Homebase, Manor Road, East Sheen	Retail	Resi-led mixed with offices and other commercial uses	1.84
32	Kew Retail Park	Retail	Resi-led redevelopment of the site with a range of commercial uses, including retail, offices (with the provision of affordable workspaces), and leisure	3.91

Ref	Site Name	Existing Use(s)	Proposed Use(s)	Site Area (ha)
35	Stag Brewery, Lower Richmond Road, Mortlake	Former brewery	Comprehensive redevelopment of the site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new heart and centre for Mortlake. The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment, commercial such as retail and other employment generating uses, health facilities, community and infrastructure facilities (such as a museum), river-related uses etc	8.77
36	Mortlake and Barnes Delivery Office, Mortlake	Royal Mail Delivery Office	Employment or other commercial and retail uses in this part of Mortlake, within the Council's Class E to residential Article 4 Direction (Site 48). Such provision should create an attractive frontage to the High Street	0.08
37	Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen	Telephone exchange	Appropriate land uses for the whole site include employment and commercial uses as well as community and social infrastructure uses. A mixed-use scheme with housing in upper floors and to the rear could be considered	0.44
<b>Total Area</b>				<b>49.48</b>

Source: London Borough of Richmond upon Thames, Publication Draft Local Plan (June 2023)



3.15 Given that these Local Plan allocations seek to provide flexibility, there is no quantitative indication about how much office floorspace could realistically come forward and be delivered across these mixed-use site allocations. For the purposes of our analysis therefore, we have conservatively assumed that just 5% of the above identified land for mixed uses (i.e. 2.47 ha of the total 49.48 ha) could accommodate office uses across the Local Plan period. This could result in a total of 32,780 sq.m of office space<sup>4</sup> as a broad indication.

### Other Opportunities

3.16 The 2021 ELPNA suggests (in paragraph 7.28) that there is also scope to re-use high street retail supply for new, small-scale office provision. Given the structural changes currently underway within our high streets, it is likely that some redundant retail property could become available and could be suitable for office use particularly under the new Use Class Order. However, this remains difficult to quantify with any degree of accuracy, so no specific allowance has been made here.

### Synthesis

3.17 Synthesising the above, we estimate that the **Borough’s** emerging office floorspace supply could total at least 46,060 sq.m, of which 13,280 sq.m relates to extant planning permissions and 32,780 sq.m to a conservative assumption that just 5% of the proposed allocated land for mixed-use development could deliver some form of office space.

## Demand/Supply Balance

3.18 As noted in section 2.0, the 2023 ELPNA Update identifies an office floorspace need figure of 36,140 sq.m for the Borough over the study period to 2041. Compared against a total pipeline of 46,060 sq.m, this results in a surplus of 9,920 sq.m across the Local Plan period as presented in the table below.

Table 3.2 Office Demand/Supply Balance across the Local Plan Period (sq.m)

	Floorspace (sq.m)
Office Requirement (2023 ELPNA)	36,140
Office Supply (Lichfields analysis)	46,060
<b>Office Surplus</b>	<b>+9,920</b>

Source: London Borough of Richmond upon Thames, Employment Land and Premises Needs Assessment Update (2023) / Lichfields analysis

3.19 It is likely that this surplus could be even higher if the proposed mixed use allocations are able to deliver a greater quantum of office floorspace than has been (conservatively) assumed for the purposes of this analysis<sup>5</sup>, and if additional office supply were to come **forward within the Borough’s** town centres through greater flexibility associated with the E Use Class.

<sup>4</sup> This assumes that 50% of that space is delivered within town centres (given the location of the designations) with a plot ratio of 2.0 and the remainder across the wider Borough with a plot ratio of 0.65. The latter aligns with the plot ratio suggested in the 2023 Update for industrial uses and business parks.

<sup>5</sup> In fact, if just 3.5% of the allocated land for mixed-use development delivers office space, this could still be adequate to meet the identified demand across the Plan period.

- 3.20 The implication is that sufficient office floorspace supply is likely to become available to accommodate office needs in full across the Borough over the new Local Plan period. In particular, the Council proposes a range of mixed-use allocations which the 2023 ELPNA Update suggests represent the most suitable and realistic opportunity to bring forward modern office space that caters for market requirements (i.e. small scale units). With this in mind, it is not clear why the 2023 ELPNA did not have some regard to future office space associated with these proposed mixed-use allocations within its calculations of future office requirements, and we believe this represents a key **deficiency within the Council's evidence**.
- 3.21 In this context, the loss of Independence House **from the Borough's office inventory** – equivalent to c.1,400 sq.m based on the consented refurbishment scheme - would have no material impact on the Borough-wide demand/supply balance for office space.

## Office Availability/Vacancy

- 3.22 The 2023 ELPNA Update reports that office availability across the Borough totals 54,890 sq.m, which represents 24.3% of the total office stock as recorded by VOA for 2022/23 (i.e. 226,000 sq.m). In other words, just under a quarter of all office space in the Borough is currently being marketed as available, which significantly **exceeds a 'normal' vacancy rate of around 7.5%** for an efficiently functioning market.
- 3.23 This available office stock is distributed across the Borough, including within its town centres, areas protected by the Article 4 Direction and in other more dispersed locations. The 2023 ELPNA Update suggests that one of the reasons for increased availability over recent years is the introduction of the Article 4 Direction which has prevented (or at least, made harder to achieve) change of use of poorer quality office space to residential.
- 3.24 This Borough-wide trend is also echoed at a more localised level within Richmond town centre which is currently characterised by a chronic over supply of office floorspace, particularly Grade A space which tends to drive occupier demand. This is described in more detail in the following section, and within the accompanying Marketing Report prepared by local agents Stirling Shaw.
- 3.25 Whilst this space remains available and unoccupied, it is likely to have a stymieing effect on other new office development from coming forward (for instance across the proposed mixed use allocations) amidst viability concerns amongst investors and developers. It also adds to the immediate pipeline of office supply, and prompted the 2023 ELPNA Study to conclude that in the short-term, the efficient operation of the office market in the Borough would not be affected if some of its vacant office floorspace was lost.

## Summary

- 3.26 The key points of the above analysis are summarised as follows:
- 1 The Publication Draft Local Plan has taken forward a legacy designation in relation to Independence House based on an assessment undertaken eight years ago. Since then, the market has undergone significant structural change and the building has been vacant for the last 3 years despite an active marketing strategy that has sought to re-occupy the building. **It's proposed designation as a Key Business Area does not reflect up-to-date market signals evidence and is therefore not justified.**

- 2 **The Borough's pipeline** of office space supply is more than sufficient in quantitative terms to accommodate future office needs identified by the Council's latest ELPNA (published in April 2023). The Council's proposed mixed use allocations appear to offer good prospects to bring forward the type of office product particularly sought after by local businesses, i.e. high quality, small scale office provision/units.
- 3 Most immediately, the Borough is currently characterised by a significant over supply of office space, with Richmond town centre in particular accommodating high levels of office vacancy. Whilst some of this available space will be able to meet short term needs, **the Council's own evidence concludes that** the efficient operation of the office market in the Borough would not be affected if some of its vacant office floorspace was lost over the short term. In fact, the current levels of over-supply are likely to stymie the delivery of new office space more aligned to current and future market requirements.

3.27 Taken together, the continued designation of Independence House as a Key Business Area **in the Publication Draft Local Plan is not supported or justified by the Council's evidence** base nor the latest market signals presented in this report (and the accompanying Marketing Report). The loss of office floorspace at Independence House would have no material effect upon the overall demand/supply balance for office space across the Borough over the new Local Plan period, nor on the performance of the current office market in Richmond (as explored further in the following section).

## 4.0 **Role and contribution of Independence House**

4.1 This section considers the current role that Independence House plays within the local office market in Richmond and its potential future contribution. It largely draws upon market intelligence and signals data provided by Stirling Shaw as the commercial property agent for Independence House, and as presented in more detail within their accompanying Marketing Report.

4.2 The office market in Richmond is clustered within the town centre, with demand strongest for prime accommodation close to key amenities including the train station. The shift to more flexible working post-Covid has noticeably dampened occupier demand.

- a At a national level, the UK office market is still recovering from the effects of the Covid-19 pandemic, with the national outlook remaining less positive in Q4 2022, according to the RICS Commercial Property Market Survey. A significant fall in occupier demand was cited across offices (net balance -29%), while the availability of leasable space continued to increase across the sector.
- b The prime office market in Richmond town centre orientates around the George Street - Eton Street - Red Lion St one-way system, extending down The Quadrant towards the train station. Demand is focused on offices located directly in the town centre that are close to the train station and local amenities such as The Green and Richmond Riverside.
- c The introduction of the E use class has had a positive impact with office premises now attracting occupational demand from a wider range of use classes than had been the case before. However, in terms of more traditional office occupiers, the post-Covid shift towards more flexible working and home working in particular has dampened demand in outer London commuter towns such as Richmond, with occupier trends defying initial expectations of an increase in demand as companies reconciled their desk requirements to save costs. Existing companies in Richmond such as TRO and Notonthehighstreet.com have instead elected to move out of Richmond and into central London in an attempt to retain / attract high quality staff.

4.3 Grade A office take-up has been declining over recent years and secondary, edge of town locations continue to remain empty as selective tenants target **“best in class” offices in the ‘core’ town centre.**

- a Take-up of prime, Grade A office space in Richmond town centre has been reducing over the last few years, from a total of just over 29,000 sqft in 2020 to just 16,000 sqft in 2022. This equates to an average of 22,232 sqft per year (over the last 3 years).
- b **A particularly noticeable trend has been a ‘flight to quality’ as tenants seek to acquire high quality offices in the right location in an attempt to attract high calibre staff back to the office environment.** For instance in 2022, town centre offices with full amenities, such as Frameworks House, absorbed the majority of



**tenant demand and only when it was fully let did tenants seek ‘next best’ offices** in the town centre such as Evergreen Studio and Greyfriars. Transactional evidence suggests that until the best Grade A offices in the core town centre are fully let, other comparable Grade A offices in secondary, edge of town locations will remain vacant.

4.4 After 35 years, the owner occupiers of Independence House relocated to higher quality office premises in Richmond town centre in early 2020 leaving **behind outdated, functionally redundant office space in an ‘out of town’** location.

- a Independence House was constructed in the mid 1980’s and was owned and occupied by William Grant & Sons (WGS) as their London HQ. By 2019 the building was extremely dated and beyond economic repair and as such required a **full ‘back to internal frame’ refurbishment**. In early 2020 WGS moved into new premises closer to the town centre - The Old Court House, Parkshot - and Independence House has been vacant ever since.
- b Independence House is the last office building along the A316 from Richmond town centre and occupies an **‘out of town’ location**.

4.5 Despite successfully achieving planning consent to refurbish Independence House to Grade A standard, the scheme is not financially viable to implement in the current market.

- a Since the building was vacated by WGS in December 2019, every effort has been made to maximise its commercial/employment generating opportunities, including obtaining planning consent to expand and fully refurbish the whole building in order to appeal to current market demand and requirements.
- b **At the time of writing, due to severely escalating build costs and ‘open ended’** marketing/vacancy periods, it remains financially unviable to speculatively implement the consented office scheme.

4.6 There is a chronic over supply of Grade A offices in Richmond town centre, **equivalent to nearly 12 years’ average take-up**. Independence House cannot compete with other available accommodation due to its inferior location.

- a **Richmond town centre’s office market is** currently characterised by a chronic over supply of Grade A office space; availability is currently estimated at around 263,000 sqft of floorspace that is either currently available to let with immediate occupation or associated with consented schemes that are scheduled to be delivered to the market in the next 12 – 18 months. Based on average take-up over the last three years, it could take nearly 12 years for the current quantum of supply to be absorbed<sup>6</sup>. There is also estimated to be a further 65,800 sqft of Grade B office space available to let within Richmond town centre.
- b Independence House (in its consented scheme form) represents around 6% of this pipeline supply and is the only Grade A office building available to let located outside of the Core Richmond Office Market/Richmond town centre. Given the

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<sup>6</sup> It should be noted that this figure of 12 years differs from the earlier reference in para 2.17 to five years as it relates to different supply data and geography.

preference noted above for a core town centre location, Independence House has, and will continue to, struggle to compete with the rest of this supply, all of which offers a more attractive proposition to office occupiers.

- c With regard to office market geography, it is important to note that Richmond town centre does not operate within the same occupier market as other parts of the Borough; whilst occupiers looking to acquire offices in Richmond town centre frequently include other towns with similar characteristics in adjacent Boroughs in their search (such as Chiswick, Hammersmith and Wimbledon), rarely do **‘Richmond’ requirements also consider secondary towns** in the Borough such as Twickenham, Kingston or Hampton as alternative locations to Richmond. This means that over-supply and vacancy in Richmond town centre is rarely absorbed by excess demand for offices elsewhere in the wider Borough.

4.7 Alternative E Class uses for Independence House have been explored but ultimately deemed to be unsuitable.

- a The introduction of E Class use in September 2020 provided the opportunity to explore alternative occupiers for Independence House, beyond traditional office occupiers. During the period of marketing, some interest has been generated from a range of alternative E Class uses including nursery providers, but due to a lack of sufficient external space the building is not suitable.
- b There has also been interest from serviced/co-working office providers, but feedback is that their preference is for central Richmond and the management **agreements offered are incompatible with WGS’s development model and** Management Board.

4.8 Evidence from an extensive period of marketing indicates no realistic prospect of Independence House becoming re-occupied in the foreseeable future.

- a Independence House has been subject to an extensive marketing campaign since 2020. This attracted a good level of interest; during the period of marketing a total of 15 direct enquiries were received from a variety of operators including standard/traditional office occupiers, serviced office operators and nursery providers. Only two were followed through with actual viewings but no offers were received to rent any of the available space.
- b Whilst the building has the potential to be let to an E Class occupier, evidence from this extensive period of marketing, alongside the market signals and trends described above, indicates no realistic prospect of Independence House becoming re-occupied in the foreseeable future.

## Summary

4.9 Independence House makes no contribution to the Richmond local economy or office market and has not done for a number of years since owner occupiers WGS vacated the building in December 2019.

4.10 Its location on Lower Mortlake Road – **an ‘out of town’ location in office market terms** – is no longer attractive to office occupiers seeking accommodation in Richmond town centre. The building requires extensive refurbishment to bring it up to the minimum standard

required by occupiers, although in the current market this remains financially unviable to proceed with.

- 4.11 The local office market has undergone significant change over recent years, with the post-Covid shift towards more flexible working having a noticeable impact on subduing demand for office space in outer London commuter locations including Richmond.
- 4.12 Take-up of Grade A office space has been declining in Richmond town centre over recent years, and more secondary, edge of town/out-of-town premises continue to remain empty **as selective tenants target “best in class” offices in the ‘core’ town centre which benefits** from crucial amenities including the train station.
- 4.13 This has resulted in a chronic over supply of Grade A offices in Richmond town centre, which could take nearly 12 years to absorb based on recent average take-up rates. This significant quantum of supply – **all of which is located within Richmond’s ‘core’ town centre** - offers clear competitive advantages over Independence House.
- 4.14 Independence House has been subject to an extensive marketing campaign for nearly three years which has failed to attract an occupier. Market signals evidence indicates no realistic prospect of Independence House becoming re-occupied in the foreseeable future.

## 5.0 Conclusions

5.1 **This report reviews the Council’s employment evidence and considers this in the context of** up-to-date market and other evidence to accompany representations made to the London Borough of Richmond upon Thames Publication Draft Local Plan (Regulation 19) consultation, which seek the exclusion of Independence House at 84 Lower Mortlake Road, Richmond from a proposed ‘Key Business Area’.

5.2 The conclusions of the assessment are set out below:

- 1 **The Council’s latest** employment evidence, published in April 2023 as part of the ELPNA Update, identifies a requirement for 22,860 sq.m of office space over the study period to 2041, which is significantly lower in scale than that identified by the earlier 2021 ELPNA study.
- 2 This updated evidence acknowledges the high vacancy rates that currently **characterise the Borough’s office market, and** recommends a notable change in approach through planning policy to respond to this, concluding that the short-term efficient operation of the office market in the Borough would **not be affected if some of the Borough’s existing vacant floorspace was lost.** Indeed, the evidence implies some loss of office space being required to help the office market reach equilibrium, and so be able to function more effectively. **The ELPNA’s** suggestion that this short term loss of office space should only be allowed outside of Key Office Areas/Key Business Areas is not justified by evidence nor the market reality that some of these areas (including Independence House) make no meaningful **contribution to the Borough’s economy and office market.**
- 3 **Despite this definitive conclusion, the Council’s proposed approach through the emerging Local Plan is to maintain its strict ‘no net loss of office floorspace’ policy** which features in the adopted Local Plan but has proved to be wholly ineffective over recent years, with the overall stock of office space gradually declining. This approach **is no longer justified by the Council’s own latest** employment evidence and therefore cannot be considered sound.
- 4 A more flexible and pragmatic approach is now required through proposed Policy 23 in order to respond to the significant supply of functionally redundant office **space that exists across the Borough’s office market and to more effectively** encourage provision of high quality accommodation that better meets the needs of local businesses. An overly-protective approach towards retaining existing surplus office accommodation – such as Independence House – risks stymieing the ability of the market to deliver future office space of the type and location that is more aligned to modern business needs over the next Local Plan period. This runs counter to the provisions of National Planning Policy Framework (NPPF) paragraph 82 which requires policies to *“allow for new and flexible working practices”*.
- 5 Through its proposals for Independence House as a Key Business Area, the Publication Draft Local Plan has taken forward a legacy designation that was based on an assessment last undertaken eight years ago. Since then, the market has undergone significant structural change and the building has been vacant for the last three years. The continued designation of Independence House as a Key Business Area



in the Publication Draft Local Plan is not supported or justified by the **Council's evidence base nor the latest market signals presented in this report.**

- 6 The Borough's pipeline of office space supply is more than sufficient in quantitative terms to accommodate future office needs identified by the Council's latest (2023) ELPNA. The Council's proposed mixed use allocations appear to offer good prospects to bring forward the type of office product particularly sought after by local businesses, i.e. high quality, small scale office provision/units. The loss of office floorspace at Independence House would therefore have no material effect upon the overall demand/supply balance for office space across the Borough over the new Local Plan period, nor on the performance of the current office market in Richmond.
- 7 Moreover, Independence House makes no contribution to the Richmond local economy or office market and has not done for a number of years since owner occupiers WGS vacated the building in December 2019. The **building's** location on Lower Mortlake Road – **an 'out of town' location in office market terms** – is no longer attractive to office occupiers seeking accommodation in Richmond town centre. The building requires extensive refurbishment to bring it up to the minimum standard required by occupiers, although in the current market this remains financially unviable to proceed with.
- 8 Declining take-up of Grade A office space in Richmond town centre over recent years has resulted in a chronic over supply, which could take nearly 12 years to absorb based on recent take-up rates. This significant quantum of available supply – all of which is **located within Richmond's 'core'** town centre – offers clear competitive advantages over Independence House. Market signals evidence, including an extensive marketing campaign for nearly three years, indicates no realistic prospect of Independence House becoming re-occupied in the foreseeable future.



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years

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National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

#### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

#### How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [REDACTED]



NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's *'Guidelines for Development near pylons and high voltage overhead power lines'* promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their *'Guidelines when working near National Grid Electricity Transmission assets'*, which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

#### How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [REDACTED]

Off

Extracts from the [Consultation Statement](#) – comments from Prospect of Richmond, FoRG and the ODPWG

(Note there were separate tables with responses to some of the specific questions raised in the consultation, with the last table showing all the detailed responses in Plan order.)

Table 1: All responses received (to question 4 on the [response form](#)) in relation to the strategic vision (section 3 of the draft Plan) (as received) and the Council's officer response

Rep No.	Name	Comment	Council's response
12	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.	Support noted.
42	Vivien Harris, Friends of Richmond Green	<p>The Friends of Richmond Green (FoRG) is an amenity action group. Our key aims and objectives are:</p> <ul style="list-style-type: none"> <li>• to promote public interest and civic pride in Richmond Green and vicinity</li> <li>• to improve the quality of life and long-term attractiveness for residents</li> <li>• to improve the character and quality of the built and natural environments</li> <li>• to improve the cleanliness and appearance of the streets and public spaces</li> <li>• to contain traffic while recognising the parking needs of residents and visitors</li> <li>• to encourage responsible use of The Green and surrounding area</li> </ul> <p>FoRG as an amenity group is over 50 years old and is run by an executive committee based on a formal constitution. The Friends of Richmond Green fully endorse and support the response by Prospect of Richmond to the new draft Local Plan. We have read the response and have been engaged with the respondents on the content. For clarification, the response is a Prospect of Richmond response with Friends of Richmond Green support and endorsement.</p>	Noted.
45	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.	Support noted.

Table 2: All responses received (to question 5 on the [response form](#)) in relation to the strategic objectives (section 3 of the draft Plan) (as received) and the Council's officer response

Rep No.	Name	Comment	Council's response
58	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.	Noted.

Off

86	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.	Noted.
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Table 3: All responses received (to question 6 on the [response form](#)) in relation to Policy 1. Living Locally and the 20-minute neighbourhood (section 4 of the draft Plan) (as received) and the Council's response

Rep No.	Name	Comment	Council's response
97	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with Policy 1 and the 20-minute neighbourhood.	Support noted.
130	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with Policy 1 and the 20-minute neighbourhood.	Support noted.

Table 4: All responses received (to question 7 on the [response form](#)) in relation to Policy 2. Spatial Strategy: Managing change in the borough (section 4 of the draft Plan) (as received) and the Council's response

Rep No.	Name	Comment	Council's response
141	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with Policy 2, Spatial Strategy: Managing Change in th borough.	Support noted.
163	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with Policy 2, Spatial Strategy: Managing Change in th borough.	Support noted.

Table 5: All responses received (to question 8 on the [response form](#)) in relation to the place-based strategies (sections 6 to 14 of the draft Plan) (as received) and the Council's response

Rep No.	Name	Comment	Council's response
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Off

171	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Our response here on the Place-based Strategy: Richmond Town and Richmond Hill and Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree.	Noted.
198	Peter Willan and Paul Velluet, Old Deer Park Working Group	Our response here on the Place-based Strategy: Kew and on Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree. [See comment 620 on the place-based strategy for Kew]	Noted.

Table 6: All responses received (to questions 9/10/11 on the [response form](#)) in relation to general comments on the Local Plan (detailed policies etc) (as received, in Plan order) and the Council's response

Rep No.	Full Name	Part of plan commenting on	Detailed Comments	Council's response
212	Peter Willan and Paul Velluet, Old Deer Park Working Group	General (in relation to title of the Plan, page numbers)	Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. Needs remedying. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. Needs remedying. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. Needs remedying.	The shortened reference to the Richmond Local Plan is considered acceptable as it is clear it is a boroughwide plan. The main audience is expected to view the Plan online (either as a pdf where the hyperlinks aid navigation and page numbers appear, or using a web-based html version which has a navigation pane), but it is intended that page numbers will be added to the final version.
213	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General (in relation to title of the Plan, page numbers)	Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. Needs remedying. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. Needs remedying. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. Needs remedying.	See response to comment 212.
214	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to Policies Map)	Neither Section 2 nor Section 15 appears to included any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.	Paragraph 2.18 referred to the Policies Map, with the document explaining it indicates the proposed changes to the Policies Map. There was a delay to the update of the existing Policies Map to reflect the Local Plan adopted in July 2018 and March 2020; an <a href="#">interactive map</a> which displays the designations and a <a href="#">PDF version</a> (due to its large file size only a low resolution version is available online).

Off

215	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to Policies Map)	Neither Section 2 nor Section 15 appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.	See response to comment 214.
217	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to evidence base)	So much in the Draft Local Plan derives from questionable analysis and questionable recommendations in Arup's Urban Design Study and, in more limited part, this in Arup's 156-page Metropolitan Open Land Review Annexe Report. Indeed, all these need to be firmly challenged.	Noted. A relevant and up-to-date evidence base underpins the Plan. See also response to comment 594 regarding the methodology underpinning the Urban Design Study. See also response to comment 929 regarding points raised on the MOL review.
218	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to evidence base)	So much in the Draft Local Plan derives from questionable analysis and recommendations in Arup's Urban Design Study and, in more limited part, this in Arup's 156-page Metropolitan Open Land Review Annexe Report. Indeed, all these need to be firmly challenged.	See response to comment 217.

241	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Paragraphs 2.44 and 2.45, in relation to Heathrow	<p>We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re-allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the Introduction paragraphs 2.44 and 2.45.</p> <p>The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that <i>'The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights...'</i> <i>'The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.'</i></p> <p>There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect.</p> <p>Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).</p> <p>There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.</p> <p>There are other national noise policies that could be deployed to deal with Heathrow noise.</p> <p>At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.</p> <p>Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.</p> <p>We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.</p>	<p>As stated in the Plan, the airport does not lie within the borough boundary and therefore there is not a policy on Heathrow.</p> <p>Update the references to the Council's position to reflect the Corporate Plan 2022 – 2026.</p> <p>The UK Civil Aviation Authority has set out a <a href="#">vision for the future of UK airspace</a> in January 2023 to help deliver quicker, quieter and cleaner journeys, as well as create more capacity for the benefit for those who use and are affected by UK airspace. The aviation and aerospace regulator has developed a refreshed Airspace Modernisation Strategy, which includes measures to introduce environmental sustainability as an overarching principle to be applied through all modernisation activities, and to provide a clear strategic path for regulatory policy and requirements. It makes it clear that the role of airspace modernisation in respect of noise impacts will be considered, and can be responsible for delivering noise reduction where it has an element of control.</p>
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242	Peter Willan and Paul Velluet, Old Deer Park Working Group	Paragraphs 2.44 and 2.45, in relation to Heathrow	<p>We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re-allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the Introduction paragraphs 2.44 and 2.45.</p> <p>The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that <i>'The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights,..'</i> <i>'The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.'</i></p> <p>There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect.</p> <p>Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).</p> <p>There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.</p> <p>There are other national noise policies that could be deployed to deal with Heathrow noise.</p> <p>At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.</p> <p>Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.</p> <p>We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.</p>	See response to comment 241.
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278	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to sustainable growth)	<p>Sustainable Growth. We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to Policy 18. In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise "Improvement" as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.</p>	<p>Update the supporting text in section 2 setting out the Strategic Context and Trends to refer to the 2021 census and latest projections. There has been weaker population growth than the ONS had been predicting, but almost three quarters of population growth has been accounted for by those aged 65 and over. The latest GLA projections (2020-based) estimate much lower population growth, to reach 196,714 (identified capacity scenario), a 0.3% change by 2039. However, there remains uncertainty, with the GLA suggesting there could be stronger migration and a rebound from the pandemic. It is clear that population change remains a significant challenge, with a projected change in the age structure of those aged 65+ to increase by 50% by 2039. It is not considered necessary to look at a lower geographical scale for population change, because for example the spending in Zone 1 is not drawn just from the residents of Zone 1.</p>
279	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to sustainable growth)	<p>Sustainable Growth. We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to Policy 18. [see comment 805 in relation to Policy 18] In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise "Improvement" as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.</p>	See response to comment 278.

586 Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)

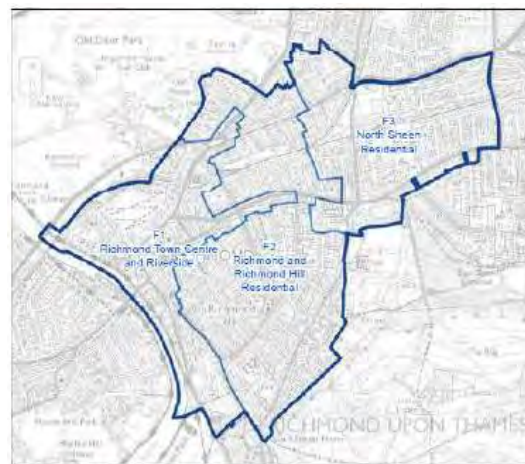
Prospect of Richmond is a group of local residents that have extensive knowledge and experience of living in or near Richmond Town and the surrounding area. Two of us have been past chairs of the Richmond Society and one a past chair of the Friends of Richmond Green and one of us chairs the Richmond Heathrow Campaign comprising the Richmond Society, Kew Society and the Friends of Richmond Green. While not part of this response we have extensive involvement with the adjacent Old Deer Park. Two are architects. Individually and together, we have been involved with many planning, licensing, traffic, heritage, charity, cultural and other matters. We are dedicated to the preserving and improving the area for the benefit of residents and other stakeholders. Over many years we have engaged extensively with Richmond-upon-Thames Council and are keen to continue doing so.

Place Definitions. We refer to Richmond Town as comprising the Conservation Areas for Richmond Town Centre, Richmond Green, Richmond Riverside and Richmond Hill. The use, character and value of the four components of Richmond are very different but it is this diversity, side by side in a relatively small area, that is so valuable. The whole is greater than the sum of the parts.

Local Plan Section 11 heading is 'Place-based Strategy for Richmond & Richmond Hill'. The study area is defined as 'Richmond Town Centre and Riverside, and the residential and mixed use areas into Richmond Hill and North Sheen'. These are character areas F1, F2 and F3 in the Urban Design Study 2021'. 'Richmond Town Centre and Riverside' (F1) is described as including Richmond Green. We believe the four components of Richmond Town should be separately identified in line with the boundaries of the Conservation Areas for Central Richmond, Richmond Green, Richmond Riverside and Richmond Hill and that the character areas should match the Conservation Area boundaries.

Confusingly, the extant 'Richmond & Richmond Hill Village Plan' (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD. We note parts of the two Riverside Conservation Areas are on the Twickenham side of the river Thames whereas the Local Plan boundary appears to be the centre of the river.

We have extracted the Character Area Map from Arup's Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.



Richmond & Richmond Hill. Urban design Study Dec 2021

				<p>Amend text in the character area profile to explicitly refer to the four conservation areas as being at the core of the town centre character area. Conservation areas and character areas represent different judgements and priorities. Whilst conservation areas aim to define aspects of heritage value, character areas aim to define areas of similar character. For consistency and ease of use, in general the character areas in the Urban Design Study 2021 aimed to follow conservation area boundaries wherever possible. However, Richmond was an example of where the conservation areas did not completely align with character – for example Richmond Riverside and Richmond Hill extend across the river into East Twickenham, and part of the Richmond Hill CA covers the riverside. The Richmond Hill CA also extends further to the south-east and encompasses areas which do not have a town centre character. Further, the character area boundary considered the town centre boundary which also does not align with conservation areas boundaries. It is overall considered that the current character areas are appropriate and no further changes are recommended.</p>
587	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Richmond & Richmond Hill	In the un-headed list of contents Section 3 is titled 'Place-based Strategy for Richmond & Richmond Hill' whereas it should be titled as 'Richmond Town Centre and Riverside, Richmond and Richmond Hill Residential and North Sheen Residential' – assuming that one accepts the highly questionable concept and structure of 'Character Areas (sic) as set out in Arup's 432-page Urban Design Study. Needs remedying.	The Urban Design Study divides the borough into nine high level 'places' which have been used to name the place-based strategies, as set out at the start of section 3 in the Urban Design Study. For simplicity these do not replicate in full the names of the 36 locally distinctive character areas. No amendments to the place-making strategy are considered necessary.

588	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Richmond & Richmond Hill in relation to Richmond BID.	We note the explicit reliance on the RBID and its Vision in the Local Plan Section 11 Place-Based Strategy for Richmond and Richmond Hill but we have not been able to find the Vision Report as evidence and are concerned that since the RBID is established by businesses alone and not residents there is likely to be a bias in favour of businesses. Also, the areas covered by the RBID are parts of Richmond Town Centre and not Richmond Green, for example where we wholly oppose commercial use, other than in the context of mixed use along Greenside. We are concerned that the democratic process may be at risk and while we are not saying this is intentional, we believe the matter needs to be resolved going forward. In so far as our response here is concerned, without the evidence we are not able to make a reasoned response on the RBID Vision included in the draft Local Plan at Placed-based Strategy- Richmond and Richmond Hill.	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. Further information about Be Richmond BID can be found on their website: <a href="https://berichmond.london/member-support/about-be-richmond">https://berichmond.london/member-support/about-be-richmond</a> . Note that BIDS are funded by a mandatory levy on eligible businesses after a successful ballot in which businesses vote; the maximum period for the levy is 5 years, and to continue their activities a new ballot must be held. The preparation of the Local Plan and its implementation is the statutory responsibility of the Council in its role as local planning authority, subject to full consultation and independent Examination in line with statutory requirements. It is not considered that any amendments to the policy are required.
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<p>589</p>	<p>Peter Willan and Paul Velluet, Old Deer Park Working Group</p>	<p>General comment in relation to Old Deer Park</p>	<p>The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret’s Estate Residents Association. This submission represents the joint response from the Group.</p> <p>The Group was formed in 2012 in recognition of the particular ecological, historical and recreational importance of the Old Deer Park and has since then worked for encouraging and securing the preparation of a coherent strategy for the effective conservation, development and management of the Park. In June, 2012, the Group published its report: The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement. Since then, it has made a number of submissions to the Council on related issues. In this connection and importantly, the Group worked collaboratively with the Council and its consultants on the preparation of the Old Deer Park Supplementary Planning Document (as published in March, 2018). The Group has also worked, and continues to work, collaboratively with the Council on the planning and implementation of projects for the enhancement of the Park, including the recently completed, award-winning scheme for improvements at and adjacent to the Park Lane entrance to the Old Deer Park Car-park. The Group is currently working with the Council to link the Old Deer Park car park with the river Thames along the area between the A316 road and the railway. It is working with the Council on tree planting and with Thames Landscape Strategy in rewilding the ODP section of Thames Arcadia.</p> <p>Richmond Town. We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Prospect of Richmond on Richmond Town to be considered alongside this response from the Old Deer Park Working Group on the Old Deer Park.</p>	<p>It is not considered that the Old Deer Park warrants its own character area. The borough-wide study undertaken by Arup as part of the Urban Design Study 2021 is necessarily at a broad scale. A finer grain of detail would be reflected within a more detailed character assessment. It is therefore not considered that any amendments to the existing character areas and boundaries are necessary.</p>
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596	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site allocation 24: Richmond Station, Richmond	<p>Both the title and the draft text of this Site Allocation need substantial amendment.</p> <p>The title should refer specifically not only to the Station, but also to the post-War, multi-storey NCP car-park to the south of the Station, the post-War parade of single-storey shops fronting The Quadrant (at nos. 27.B to 27.G) and the post-War office-block fronting Drummond's Place to the south and south-west of the Station, to the post-War parade of shops fronting Kew Road (at nos. 2 to 8 consec.) and the offices above (Westminster House) to the north of the Station, and the surface-level car-park to the north of the Station. A clear distinction needs to be made between proposals directly affecting the Station (together with the tracks and present day-lit, open-air platforms) and those affecting the other buildings and space referred to above. Whilst such proposals need to be coherent, they need to have regard to the substantially different considerations that apply to the present, very fine, locally listed Southern Railway Station complex (and not merely to its front façade to Kew Road and the upper booking-hall), completed in 1937, which is clearly worthy of statutory listing, together with the very fine 19th century platform-canopies serving platforms 4 and 5 and 6 and 7. Given the particular heritage significance of the Station complex - as distinct from the lack of heritage significance of the other buildings and space around the Station (the multi-storey car-park to the south of the Station, the parade of single-storey shops and the office-block fronting The Quadrant and Drummond's Place to the south and south-west of the station, the parade of shops and the offices above fronting Kew Road to the north of the Station, and the surface-level car-park to the north of the Station), there is clearly no scope whatever for the redevelopment of the existing Station complex - or for decking-over the tracks and the present day-lit, open-air platforms.</p> <p>However, this is not to suggest that there is no scope to enhance the existing Station complex - principally by carefully reinstating and restoring its original and very distinctive architectural interest and integrity, which has long remained a desirable objective, involving the removal of a series of damaging alterations carried out over recent years. Importantly, too, any proposed decking-over of the existing platforms and tracks and the resulting loss of daylighting and natural ventilation for the travelling public would not only have a massive and damaging impact on the amenity presently enjoyed by the public using the Station, but would also be wholly inconsistent with current national, London-wide and local sustainability interests. Most importantly, any significant increase in retail, leisure and/or entertainment uses on the site is most likely to harm damage the viability and vitality of the existing and long-established retail, leisure and entertainment in the heart of the Town to the south by drawing people away from The Quadrant, George Street, Sheen Road, The Square, Duke Street, King Street, Red Lion Street, Hill Street and Bridge Street. Similarly, any significant increase in retail, leisure and/or entertainment uses on the site is likely to necessitate a significant level of vehicular servicing that could only be provided via The Quadrant or Kew Road.</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the suggested suitability of the Station site and its immediate setting as 'a tall building zone (7-8 storeys)... with the opportunity for a landmark building' is wholly unacceptable, unrealistic and needs to be omitted altogether.</p> <p>Importantly, there is a clear need to fundamentally review and revise the current Development Brief for the Station site which dates back to March, 2002.</p>
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				<p>The Site Allocation comprises Richmond Station, the railway tracks to the rear, Gateway House and the multi-storey car park to the south, and Westminster House and open car park to the north. No changes to the wording are therefore required in this regard.</p> <p>See response to comment 595 with regards the heritage status of the station and the aspects of the site which are considered to most positively contribute to its designation and setting. The text as proposed would not preclude a development from coming forward which does not include the station, and vice versa. It is therefore not considered that any amendments to the wording are required.</p> <p>With regards the impact of a retail offer on site, commercial/retail uses are considered appropriate given the town centre location and an impact assessment on existing shopping centres would not be required by policy. There is an existing officer on site and a reprovision and enhancement of this is considered appropriate for a transport hub. It is considered that this would be complementary to, rather than detrimental to, existing shopping areas nearby, particularly given the Site Allocation recognition that the site acts as a gateway to the Richmond area.</p> <p>See response to comment 594 with regards the appropriateness of a tall building zone.</p> <p>Support for a revised development brief for the site is noted.</p>
-	Peter Willan and Paul Velluet, Old Deer Park Working Group		[See comment 1035 in respect of Policy 45 and high rise development which refer to Richmond Station]	See response to comment 594 with regards the appropriateness of a tall building zone.

597	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 25. Former House of Fraser, 16, Paved Court, 20, King Street, 4 to 8 and 10, Paved Court and 75-81, George Street, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any development of the site to provide for the enhancement of the external elevations of the existing 1960s building and the complete removal of the existing plant-enclosures at roof level in order to enhance views of the building from The Green and Hill Street, particularly in relation to the setting of the grade II* listed properties in Old Palace Terrace on Richmond Green, and that any extension or extensions to the existing building should rise no higher than the existing building (i.e. above four storeys), or that any replacement development of the site should rise no higher than that of the existing building .</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F1 Central Richmond and Richmond Green Conservation Area Statements</p>	<p>The former House of Fraser building itself is not a heritage asset, though the Site Allocation makes clear that any development proposal must be of the highest quality in character, respond positively to the Conservation Areas and protect and where possible enhance on-site Listed Buildings and BTMs, as well as nearby heritage assets. Thus any future planning application would to have regard to heights, elevational design and roof treatments as part of the demonstration of compliance with the above. To list these specific requirements is considered to be too prescriptive for the purposes of a Site Allocation, whose existing wording would already allow for assessment of these matters. Thus no changes to the wording are recommended.</p>
600	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 26 - Richmond Telephone Exchange, Spring Terrace, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing building should rise no higher than the three-storey part of the existing building, or that any replacement development of the site should rise no higher than that of the three-storey part of the existing building.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F1 Sheen Road Conservation Area Statement</p>	<p>See response to comment 599 with regards to heights.</p>
603	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 27. The American University, Queen's Road, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing buildings on the site should rise no higher than any of the existing buildings on the site, or that any replacement or additional buildings on the site should rise no higher than any of the existing buildings on the site.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F2 Richmond Hill Conservation Area Statement</p>	<p>The Site Allocation makes clear that any development proposal must protect and where possible enhance the heritage assets on site and the Conservation, as well as nearby heritage assets, having regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance set out in the Urban Design Study and Village Planning Guidance. 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. The wording of the Site Allocation is therefore considered to be appropriate and no amendments are recommended.</p>



609	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 28 - Homebase, Manor Road, North Sheen	<p>(N.b. Not East Sheen)</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text of this Site Allocation needs to be amended by the deletion of the statement: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones', and the statement '...however the Urban Design Study 2021 recommends the appropriate heights for the zone are up to 8 storeys to respect the small scale of the surrounding area'. The draft text needs to be further amended to include specific reference to the need for any new development across the site to rise no higher than four storeys in order to relate the predominantly two-storey scale of the nearby residential areas to the north, north-west, west, south-west, south and east of the site, and to the similarly scaled properties within the nearby Sheendale Road and Sheen Road Conservation Areas'.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F3</p>	<p>See response to comment 594 regarding the methodology underpinning the Urban Design Study.</p> <p>Part of the site is identified within the UDS as having capacity for buildings of 7-8 storeys, illustrated on the heat maps on p.256 and p.328. The heat maps show the tallest buildings located in the centre of the site and reducing in height, reflected in the mid-rise zone which provides a transition to the smaller scale of the surrounding area.</p> <p>Additional wording to make specific reference within Appendix A to 2-storey prevailing heights to the N, NW, W, SW and SE and more specific separate references to the Homebase site versus the Sainsburys site has been amended in the updated Urban Design Study. However, no changes to the Site Allocation itself are recommended.</p>
616	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 29 - Sainsbury's, Lower Richmond Road and Manor Road, North Sheen	<p>Site Allocation 29 - Sainsbury's, Lower Richmond Road and Manor Road, North Sheen</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text needs to be amended by the deletion of the sentence: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones'.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Charcater Area F3</p>	<p>See response to comment 594 regarding the methodology underpinning the Urban Design Study. The site is assessed as having capacity for buildings up to 7-8 storeys in part of the site, stepping down around the edges of the site to a mid-rise zone with maximum 5-6 storeys. No amendments to the Site Allocation are required.</p>

618	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Kew	<p>Based on Section 3 – Character Areas in Arup’s 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area ‘G1 – Kew Gardens and Riverside’ under the overall heading ‘G –Kew’). Like Richmond Park, the Old Deer Park should be covered by its own Character Area as ‘F4 – The Old Deer Park’, under the overall heading of ‘F – Richmond &amp; Richmond Hill (sic)’. On this basis, other sections of Arup’s Urban Design Study and to the Draft Local Plan need to be adjusted accordingly.</p> <p>Indeed, more fundamentally, the proposed structure of ‘Character Areas’ relating to Richmond, Kew and North Sheen as set out in Section 3 et seq. in Arup’s Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. They should surely be based for the most part on the present conservation areas.</p>	<p>The Old Deer Park is grouped into the character area G1 ‘Kew Gardens and Riverside’ because it is similar in character to the open spaces along this stretch of the Thames with regards to its green space, openness and its location next to the river. It is also part of the Kew Registered Park and Garden.</p> <p>The character areas and boundaries for the Urban Design Study (UDS) 2021 were subject to public consultation in May to June 2021. The method for defining the boundaries is set out in the methodology of the UDS pp.351- 353. This explains that, alongside field work, the following sources of information was used to define the boundaries included:</p> <ul style="list-style-type: none"> <li>-the Village Planning Guidance SPDs</li> <li>-Ward boundaries</li> <li>-existing town centres and areas of regeneration</li> <li>-conservation areas.</li> </ul> <p>Wherever possible, the UDS has followed conservation area boundaries and in particular, aimed not to split conservation areas. In some cases, conservation areas have been grouped because they are at too fine a grain for the scope of the study. The existing boundaries of the Village Planning Guidance were also used wherever possible, though areas were combined to achieve a more usable scale for the scope and purposes of this borough-wide study.</p> <p>The Old Deer Park is written about separately in the character area profile on p.170 and it is not considered that it warrants a separate character area profile.</p> <p>With regards to the other boundaries within the Richmond, North Sheen and Kew place, a detailed description of how these have been defined is provided below.</p> <p>Richmond Town Centre and Riverside: The boundary aims to incorporate the town centre character and uses and the Richmond part of the Riverside. Southern edge follows Village Planning SPD Area 13 along the river to Twickenham Bridge where it then follows the bridge as a logical feature and perceptual ‘end’ of Richmond town, before following the Village Planning SPD Area 13 and 14 and Conservation Area boundary with Old Deer Park. To the north west it follows Village Planning</p>
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619	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Kew (in relation to Old Deer Park)	We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Old Deer Park Working Group on the Old Deer Park to be considered alongside this response from the Prospect of Richmond on Richmond Town.	See response to Comment 618 regarding the character area boundaries and Old Deer Park.  Comments noted.
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Peter Willan and Paul Velluet, Old Deer Park Working Group

Place-based Strategy for Kew (in relation to Old Deer Park)

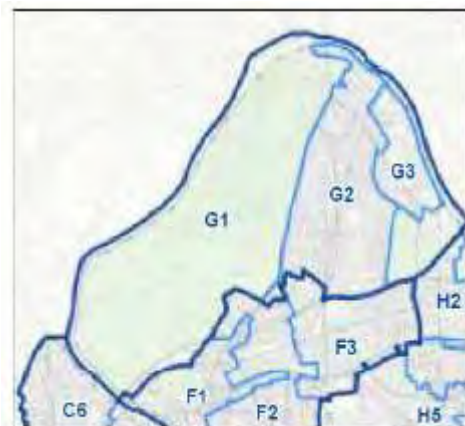
Place Definitions. Based on Section 3 – Character Areas in Arup’s 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area ‘G1 – Kew Gardens and Riverside’ under the overall heading ‘G –Kew’. Like Richmond Park, the Old Deer Park should be covered by its own Character Area as ‘F4 – The Old Deer Park’, under the overall heading of ‘F – Richmond & Richmond Hill (sic)’. On this basis, other sections of Arup’s Urban Design Study and to the Draft Local Plan need to be adjusted accordingly.

Indeed, more fundamentally, the proposed structure of ‘Character Areas’ as set out in Section 3 et seq. in Arup’s Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. They should surely be based for the most part on the present conservation areas and in this case the Old Deer Park Conservation Area.

Confusingly, the extant ‘Richmond & Richmond Hill Village Plan’ (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD.

We have extracted the Character Area Map from Arup’s Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.

See response to Comment 618 regarding the character area boundaries.



Kew Character Areas (G1 ODP), Urban Design Study Dec 2021

- Conservation Area 1: Royal Park
- Conservation Area 2: The People's Temple
- Conservation Area 3: North of Lower Hill Road
- Conservation Area 4: South of Lower Hill Road
- Conservation Area 5: Richmond Hill
- Conservation Area 6: Old Deer Park
- Conservation Area 7: Riverside Lower and Upper Richmond Road
- Conservation Area 8: Royal Botanic Gardens
- Conservation Area 9: Queen's Road Estate
- Conservation Area 10: Queen's Road (over hill)
- Conservation Area 11: Richmond Hill
- Conservation Area 12: Richmond Hill
- Conservation Area 13: Richmond Hill
- Conservation Area 14: Richmond Hill
- Conservation Area 15: Richmond Hill
- Conservation Area 16: Richmond Hill
- Conservation Area 17: Richmond Hill
- Conservation Area 18: Old Deer Park



Conservation Areas Richmond & Richmond Hill Village Plan



634	Peter Willan and Paul Velluet, Old Deer Park Working Group	Site Allocation 32: Pools on the Park and surroundings, Old Deer Park, Richmond	<p>The fourth bullet-point in the draft text needs to be amended to refer to the fact that at present the Statement of Significance is only in an incomplete draft form and needs to be amended before formal adoption in order to take full account of the particular special interest and significance of the listed pools complex and its landscaped setting. (In this connection, the Old Deer Park Working Group has been pressing the Council to undertake such amendment repeatedly since March, 2018. The text also needs to take account of the repeated requests by the local community over the last forty years for the Pools complex and its surrounding landscaped setting to be designated as Metropolitan Open Land, like the parkland which surrounds them).</p> <p>Supporting document/evidence:  Urban Design Study December 2021 (Character Area G1)  Old Deer Park Conservation Area Statement  Old Deer Park: The Crown Estate Landscape Strategy 1999  Old Deer Park Supplementary Planning Document 2018 Draft Statement of Significance  Old Deer Park: The Crown Estate Landscape Strategy 1999  Old Deer Park Supplementary Planning Document 2018</p>	<p>It has been clarified on the Council's website in May 2022 that the Statement of Significance: Richmond Public Baths, Old Deer Park, Richmond September 2017 a draft version. It remains appropriate that the Site Allocation refers to this document. The special interest and significance of the site and its surroundings is well recorded in other documents too, including the Old Deer Park SPD February 2018, CA57 Old Deer Park Conservation Area appraisal, and Richmond and Richmond Hill Village Planning Guidance June 217. These are all identified in the Site Allocation. The text also makes specific reference to the importance that any development proposal is considered within the context of the designations of the site and surrounding area. It is therefore considered that the current wording of the text is sufficient.</p> <p>Pools on the Park is a developed parcel of land which also includes a sizable amount of hardstanding. It is not considered that the site would score sufficiently highly against the 4 criteria used as part of the Open Land Review 2021 intended to inform the new Local Plan and consequently there are no plans by the Council to extend the surrounding MOL designation to include the site.</p>
638	Peter Willan and Paul Velluet, Old Deer Park Working Group	Site Allocation 33: Richmond Athletic Association Ground, Old Deer Park, Richmond	<p>No change proposed.</p> <p>Supporting document/evidence:  Urban Design Study December 2021 (Character Area G1)  Old Deer Park Conservation Area Statement  Old Deer Park: The Crown Estate Landscape Strategy 1999  Old Deer Park Supplementary Planning Document 2018</p>	Noted.
673	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General - Policies	Section 15 in the un-headed list of contents – titled 'Policies' - doesn't contain anything other than one photograph. Instead, the polices are set out in Sections 4 and 16 to 26 inclusive. Needs remedying.	-
674	Peter Willan and Paul Velluet, Old Deer Park Working Group	General - Policies	Section 15 in the un-headed list of contents – titled 'Policies' - doesn't contain anything other than one photograph. Instead, the polices are set out in Sections 4 and 16 to 26 inclusive. Needs remedying.	-

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678	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Climate Change Emergency.	We welcome the increased emphasis given to climate change and pollution.	Support noted.
679	Peter Willan and Paul Velluet, Old Deer Park Working Group	Climate Change Emergency.	We welcome the increased emphasis given to climate change and pollution.	Support noted.
794	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to culture)	We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council's Culture Richmond 2021-2031 Plan.	Noted.
795	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to culture)	We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council's Culture Richmond 2021-2031 Plan.	Noted.

805

Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)

Policy 18. Development in centres

We refer to Arup's Urban Design Study, December 2016; Lichfields Richmond-upon-Thames Retail and Leisure Needs Study Phase 1 Update, July 2021; Icen's Richmond Local Housing Market Assessment, December 2021; and Santec's Employment Land and Premises Needs Assessment, December 2021- all provided as supplementary evidence by the Council.

We have sought to pull together the estimated demand and availability of floor space for all uses in Richmond Town from 2021 to 2039.

**Richmond Zone 1 Retail, Non-retail services and Leisure Floor space**

Lichfields' Report estimates population as shown in Figure 1 and retail, non-retail services and leisure over/under supply in Figure 2. Richmond borough is divided by Lichfields into 7 zones: Richmond, Twickenham, Whitton, Teddington, Hampton, Kew/North Richmond, Barnes/E Sheen. The focus here is on Zone 1 for which a map is shown in Figure 3. The population for the borough is estimated to rise by only 2.9% from 2021 to 2039 and to decline slightly in Richmond Zone 1. The over/under supply of space is calculated by estimating the expenditure per person and then the total available expenditure based on the population. Expenditure from existing facilities is estimated and subtracted from the available expenditure to establish the incremental expenditure from new facilities. This increment is then converted into net floor space by turnover density factors and finally into gross floor space over/under supply. We question why Table 11 page 74 of the Lichfields' Report is headed Gross floor space - a step of first calculating Net floor space seems to be missing.

It is estimated that in 2039 there will be an under supply of retail and non-retail services floor pace of 1,457 m2 and an over supply in preceding years. There is an estimated under supply of 7,000 m2 for leisure in 2039 and 4,000 m2 in 2034 but no information for earlier years. Non-retail services include hairdressers, banks, restaurants, cafes and hot food takeaways. Leisure includes cinemas and cultural activities. Home/internet turnover is taken into account.

Table 1	Population				
	2021	2024	2029	2034	2039
Population Richmond Zone 1 see map attached	23,031	22,440	22,056	22,170	22,536
Population Richmond Borough	199,603	198,220	200,146	201,548	205,200

Figure 1 Source Lichfields report on Retail and Leisure

Table 3.1a	Over(-)/under(+) Supply Cumulative Gross Floorspace					
	Total 2017	2021	2024	2029	2034	2039
	m2	m2	m2	m2	m2	m2
Retail Convenience	7,950		-246	-163	55	388
Retail Comparison	31,727		-1,584	-2,075	-1,895	-1,342
Food/beverage	4,640		-3,266	-217	891	2,411
Non-retail Services						
<b>Total</b>	<b>44,317</b>		<b>-5,106</b>	<b>-2,455</b>	<b>-949</b>	<b>1,457</b>
Leisure					4,000	7,000

Figure 2 Source Lichfields report on Retail and Leisure

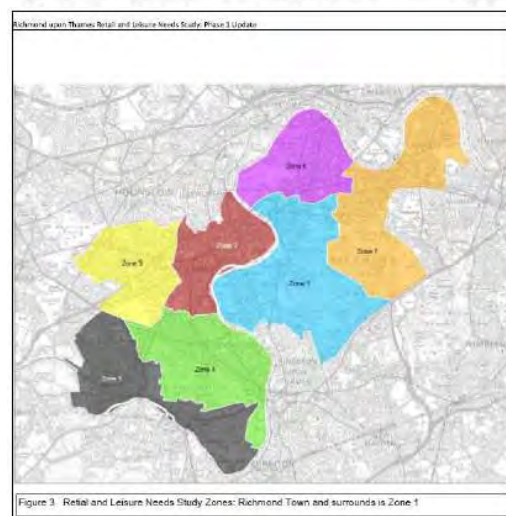


Figure 3 Retail and Leisure Needs Study Zones: Richmond Town and surrounds is Zone 1

				<p>The Evidence Base seeks to forecast the need for land uses to ensure that needs are met as required by the NPPF. The research has been produced separately, reflecting industry-standard approaches, but in a co-ordinated way, with liaison between consultants.</p> <p>The Council's Town Centre Land Use Survey records ground floor occupiers of premises in the borough's centres, covering approximately 2,500 premises. Despite the pandemic, data have continued to be collected and analysed with surveys taking place in 2019, 2020, 2021 and 2022.</p> <p>The RLNS has been purposefully split into two phases to allow for the more detailed assessment, including the qualitative element, to be produced in 2022 when it was expected that the impact of the pandemic would have lessened from the previous year, in order to produce as accurate an assessment as possible, bearing in mind timetabling commitments for the Local Plan.</p> <p>This approach, coupled with the updating of key elements of the evidence base including the Employment Land and Premises Needs Assessment and the Urban Design Study provide an up-to-date basis which supports the Regulation 19 Local Plan.</p>
807	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment in relation to planning uses	We welcome the recognition of the implications, including the risks, of the new combined business land Use Class E and changes to permitted development rights. We comment later on this topic and the potential consequences for balancing the uses of Richmond Town and its character.	Noted.



<p>812</p>	<p>Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)</p>	<p>General comment in relation to Evening and Night Time Economy.</p>	<p>We note support throughout the Local Plan to Richmond town centre Night Time economy and in some cases extending to the Riverside and Richmond Green. We welcome the caveat in the Local Plan as stated in Policy 19, Managing Impacts and elsewhere, that there is a combined and cumulative impact that needs to be controlled and that amenity of residents needs to be protected. It may be semantics but we recommend a greater distinction between the evening and night time economies with the later applying to the late evening early hours of the morning. We are opposed to supporting a Night time economy in Richmond Town and on and around Richmond Green due to resident harm and the Riverside due to resident harm including those on the Twickenham riverside.</p> <p>Richmond town and surrounding areas have one of the highest ratios of pubs and bars to residents in the whole of London and moreover confined to a small area by the Thames and railway line. Public transport is reduced by midnight and is very limited shortly thereafter. Police and cleansing resources are not available at night time. We support the evening economy, and increasing family use, but the town needs to wind down before midnight so residents can get their eight hours sleep as advised by the WHO, difficult as this is with Heathrow night flights starting at 4:30am.</p> <p>We note Policy 19 does enable the Council to limit closing hours of premises. But we urge the Local Plan to go further. Night time economy infers activity past 11pm into the early hours of the morning and we would urge the Local Plan to explicitly discourage this in Richmond Town, but of course recognising there may be exceptions. Disturbance of residents arises to those living in the heart of the town as well as on and around Richmond Green and along the Riverside which also includes resident disturbance on the Twickenham riverside. We urge better distinction between the evening and night economies.</p>	<p>Richmond town centre is recognised in the London Plan as having a classification NT 2 – an area of regional/sub-regional importance in terms of the night-time economy.</p> <p>It is considered that the policies proposed, particularly Policy 19, are sufficiently robust to ensure that impact on residential amenity is taken fully into account. The preferred approach is to consider each proposal on its merits and include consideration of cumulative impact and whether the proposal would result in the over-concentration of similar uses contrary to policies 18 &amp; 19.</p> <p>The Council’s Licensing policy may also be taken into account, including the Cumulative Impact Policy applying to large parts of the centre. Hours of operation can be restricted where reasonable and appropriate under both licensing and planning regimes.</p>
<p>865</p>	<p>Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)</p>	<p>Policy 28. Local character and design quality (Strategic Policy)</p>	<p>The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework .</p> <p>The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.</p>	<p>The purpose of Policy 28 is to encompass all development within the Borough, with special attention paid to the 'places' and 'character areas' identified in the Urban Design Study. Conservation Areas are included in this umbrella policy/by default but have more specific expectations outside of the scope of this policy, which are outlined in Policy 29 – Designated Heritage Assets.</p> <p>The purpose of the Urban Design Study is outlined in detail in Policy 2 (Spatial Strategy: Managing change in the borough) and in sections 5 and 6 of the Local Plan.</p> <p>See also response to comment 586.</p>

Off

866	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 28. Local character and design quality (Strategic Policy)	The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework . The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.	See response to comment 865.
878	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 29. Designated heritage assets	No change proposed.	Comment noted.
879	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 29. Designated heritage assets	No change proposed.	Comment noted.
885	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 30. Non-designated heritage assets	No change proposed.	Comment noted.
886	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 30. Non-designated heritage assets	No change proposed.	Comment noted.
927	Peter Willan and Paul Velluet, Old Deer Park Working Group	MOL Review – naming of Parcel 28 and Parcel 31	The Arup MOL Review Annex Report; a Parcel 28 page 92 is titled Little Green. It should be Richmond Green, b Parcel 31 page 101 is titled Thames Old Deer Park. It is not part of the Old Deer Park.	The Open Land Review has been updated in 2023 to incorporate these suggestions for the site assessments.

929	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 35 – Green Belt, Metropolitan Open Land and Local Green Space	<p>We respond here on MOL status for Richmond Green, Policy 35, which is significantly undervalued by Arup's MOL Review Annex Report, and on Riverside North of Richmond Bridge and Riverside South of Richmond Bridge.</p> <p>Under the heading 'Proposed changes to the Policies Map' the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.</p> <p>(In Arup's 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 'Parcel' (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens 'Parcel' – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside 'Parcel' – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that 'the eastern third of the parcel, is developed and does not meet the MOL criteria' and that its MOL status should be considered further. The parcel is certainly NOT 'largely inaccessible to people' as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.</p> <p>In relation to the The Green and Little Green, Richmond 'Parcel' – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of The Buildings of England – London 2: South as 'one of the most beautiful urban greens surviving anywhere in England', Richmond Green possesses not only considerable architectural, historic and landscape interest and significance, but importantly, constitutes a</p>	<p>The Council, through the Arup Open Land Review (2021) only assessed existing MOL based on mapping from 2015. It is not the Council's intention to identify new parcels of land for MOL for the new Local Plan.</p> <p>Arup, in their Open Land Review 2021, separated parcel 26 from parcel 24 using accepted methodology for undertaking MOL reviews in line with national Green Belt policy, which states boundaries are to be defined 'using physical features that are readily recognisable and likely to be permanent' (paragraph 143, NPPF), in this case the A316. This eastern part of the parcel is still designated as a Registered Park and Garden, however due to a lack of 'openness' it is considered that it cannot be recommended to meet MOL purposes on this feature alone. The Council do not propose to change the MOL designation of this site in line with the Reg 18 plan.</p> <p>For criterion 4, the assessment considers whether the parcel forms part of a strategic corridor, node or link in the network of green infrastructure. A large amount of the parcel is unfenced lawn, which could be used by people, but as it has no formal access routes (apart from a small section of the Thames Path), it was considered to provide limited access links for people. Whilst the eastern third of the parcel is publicly accessible, due to its developed nature (a public car park), it was not considered to contribute to the green infrastructure network. The parcels contribution to the River Thames path was considered, scoring moderate (3) overall, despite most of the parcel scoring more weakly.</p>
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930

Peter Willan and Paul Velluet, Old Deer Park Working Group

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

We respond here on MOL status and boundary anomalies and seek to remove any question of an important part of the Old Deer Park ceasing to being designated as MOL, as raised in Arup's MOL Review Annex Report. We comment further on Policy 35 Green Belt, Metropolitan Open Land and Local Green Space.

Under the heading 'Proposed changes to the Policies Map' the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.

(In Arup's 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 'Parcel' (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens 'Parcel' – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside 'Parcel' – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that 'the eastern third of the parcel, is developed and does not meet the MOL criteria' and that its MOL status should be considered further. The parcel is certainly NOT 'largely inaccessible to people' as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.

In relation to the The Green and Little Green, Richmond 'Parcel' – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of The Buildings of England – London 2: South as 'one of

- The Council, through the Arup Open Land Review (2021) only assessed existing MOL based on mapping from 2015. It is not the Council's intention to identify new parcels of land for MOL for the new Local Plan.
- Arup, in their Open Land Review 2021, separated parcel 26 from parcel 24 using accepted methodology for undertaking MOL reviews in line with national Green Belt policy, which states boundaries are to be defined 'using physical features that are readily recognisable and likely to be permanent' (paragraph 143, NPPF), in this case the A316. This eastern part of the parcel is still designated as a Registered Park and Garden, however due to a lack of 'openness' it is considered that it cannot be recommended to meet MOL purposes on this feature alone. The Council do not propose to change the MOL designation of this site in line with the Reg 18 plan.
- For criterion 4, the assessment considers whether the parcel forms part of a strategic corridor, node or link in the network of green infrastructure. A large amount of the parcel is unfenced lawn, which could be used by people, but as it has no formal access routes (apart from a small section of the Thames Path), it was considered to provide limited access links for people. Whilst the eastern third of the parcel is publicly accessible, due to its developed nature (a public car park), it was not considered to contribute to the green infrastructure network. The parcel's contribution to the River Thames path was considered, scoring moderate (3) overall, despite most of the parcel scoring more weakly.
- The Council have amended criterion 4 to reflect the points set out above.



Off

952	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 37. Public open space, play, sport and recreation	No change proposed.	Noted.
954	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to culture)	We understand the Council expect to undertake a further Sports Review in 2022.	The Council has developed an update to the Richmond Playing Pitch Strategy.
955	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 37. Public open space, play, sport and recreation	No change proposed.	Noted.
1013	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 43. Floodlighting and other external artificial lighting	No change proposed.	Noted.
1014	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 43. Floodlighting and other external artificial lighting	No change proposed.	Noted.
1018	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 44. Design Process	The wording of Part B of the Policy needs to be amended to omit reference to 'the design guidance for the relevant character area as specified within the Urban Design Study 2021' insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in 'F. Richmond and Richmond Hill' (on page 255).	All development would be expected to have regard to the relevant character area set out in the Urban Design Study 2021, including proposals in Tall and Mid-Rise Building Zones and those within the Richmond and Richmond Hill character area. It is not considered that any changes to the wording are therefore considered to be necessary.
1019	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 44. Design Process	The wording of Part B of the Policy needs to be amended to omit reference to 'the design guidance for the relevant character area as specified within the Urban Design Study 2021' insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in 'F. Richmond and Richmond Hill' (on page 255).	See response to Comment no. 1018.

1032	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 45.Tall and Mid-Rise Building Zones	<p>The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a 'Tall' or 'Mid-rise' buildings Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of 'Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading 'F. Richmond and Richmond Hill' relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). * In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.</p> <p>Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that 'Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land' has no relevance at all to the existing urban character of Richmond, its sustainable development, its enhancement or the provision of 'affordable housing' for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.</p>	<p>See response to comment 1030 with regards the methodology underpinning the Urban Design Study, which is considered to be robust and sound.</p> <p><u>Richmond Station</u></p> <ul style="list-style-type: none"> <li>-The Urban Design Study 2021 has identified the site as having capacity to accommodate buildings of up to 7-8 storeys. The text on p.255 highlights that the opportunities for the tallest heights are within parts of the zone, and that buildings should step down to the surroundings, as indicated by the heat map and surrounding mid-rise zone.</li> <li>-The character profile on p.158 notes that there is an underwhelming sense of arrival at the station.</li> <li>-The design guidance on p.297 states that main roads may be able to accommodate taller buildings if stepped back. It also recommends the sense of arrival and quality of the public realm at the station could be enhanced.</li> <li>-The strategy for the area is to conserve and enhance the identity of specific areas (notably around the station) and the functioning of the area as a town centre.</li> <li>-The assessment in Appendix A on p.325 provides a rationale for the appropriate heights identified. A scenario was tested on the site, which was developed in the context of providing active ground floor uses, respecting the height of the existing locally listed station building, setting the taller element back behind the primary frontage and noting there is potential for a new development to serve as a landmark gateway marking the arrival point in Richmond.</li> </ul> <p>The existing commercial building to the south of the station is 5 storeys (and 6 storeys to the east where the ground level drops).</p> <ul style="list-style-type: none"> <li>-A ZTV was produced to test the potential visibility of the scenario heights and a high level townscape, visual and heritage assessment was undertaken. The assessment concludes that there <i>'is potential for some additional height, but only where this is substantially set back within the plot and away from the road frontage'</i>.</li> <li>-The assessment notes the tall building zone is limited by the many sensitivities including the locally listed station</li> </ul>
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1033	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to high rise development)	We are deeply concerned at the support given for high rise development at the Richmond Station and comment on <b>Site Allocation 24 Richmond Station, 28 Homebase and 29 sainsbury's and Policy 45 Tall and mid-rise Building zones.</b> [See comments 596, 609, 616 and 1032]	See responses to comments 50594, 96, 609, 616 and 1032. No further amendments are required.
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1034	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to high rise development)	We are concerned at the support given for high rise development at the Richmond Station and elsewhere given the potential for interrupting views and vistas that are so important to the Old Deer Park. We comment on Site Allocation 24 Richmond Station and Policy 45 Tall and mid-rise Building zones. [See comment 1035]	See response to comment 1032 with regards to Richmond Station. Figure 424 on p. 327 of the Urban Design Study 2021 provides an illustrative view from Vu.City illustrating the potential visibility from within Old Deer Park. Whilst the upper parts of an 8 storey building would be visible in a bare earth view, in reality it would be largely screened by trees and vegetation around the park. No amendments to the text are required.
1035	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 45.Tall and Mid-Rise Building Zones	<p>The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a ‘Tall’ or ‘Mid-rise’ buildings Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of ‘Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading ‘F. Richmond and Richmond Hill’ relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). * In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.</p> <p>Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that ‘Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land’ has no relevance at all to the existing urban character of Richmond, its sustainable development, its enhancement or the provision of ‘affordable housing’ for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.</p>	Please see responses to comments 1030 and 1032 regarding the Urban Design Study methodology, Richmond Station, North Sheen and tall buildings’ impact on townscape. No amendments to the text are necessary.
-	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	High rise development	[See comment 1033 in respect of high rise development and comment 1032 in respect of Policy 45]	See response to comment 1032 with regards to Richmond Station. No amendments are required.



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-	Peter Willan and Paul Velluet, Old Deer Park Working Group	High rise development	[See comment 1035 in respect of Policy 45 and high rise development which refer to Richmond Station]	Please see responses to comments 1030 and 1032 regarding the Urban Design Study methodology, Richmond Station, North Sheen and tall buildings' impact on townscape. No amendments to the text are necessary.
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## **Draft Local Plan Pre-Publication Consultation**

**From 10 December 2021 to 31 January 2022**

### **RESPONSE FORM**

The Council is inviting comments on the first draft of the Local Plan.

The draft Local Plan sets out a 15-year strategic vision, objectives, place-based strategies and the overall spatial strategy for the borough as well as the planning policies that will guide future development in the borough. It looks ahead to 2039 and identifies where the main developments will take place, and how places within the borough will change, or be protected from change, over that period. In addition, the draft Local Plan sets out the site allocations that are considered to assist with the delivery of the vision and strategy of the Plan. This is of particular importance for ensuring there is sufficient land for employment, retail, housing and social infrastructure.

We would like to hear the views from our local communities, businesses and other key organisations on the draft Plan.

#### **How to respond**

Please read the consultation documents and other background information made available on the Local Plan website. To view the draft Local Plan and take part in the consultation, visit [https://www.richmond.gov.uk/draft\\_local\\_plan\\_pre\\_publication\\_version](https://www.richmond.gov.uk/draft_local_plan_pre_publication_version)

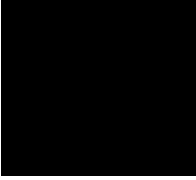



#### **You can respond on the consultation documents in the following ways:**

- Online response form through our **consultation portal** <https://richmond-consult.objective.co.uk/kse>
- Email to **LocalPlan@richmond.gov.uk** this response form (a PDF and Word version of the form can be found on the Council's website at [https://www.richmond.gov.uk/draft\\_local\\_plan\\_pre\\_publication\\_version](https://www.richmond.gov.uk/draft_local_plan_pre_publication_version)). In the form in 'Word' format you can type in your response and return it as an email attachment
- Post a hard copy of the form to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ.

All responses must be received by Monday **31 January 2022**.

#### **This form has three parts:**

- Part A – Personal details and about you
- Part B – Your general views
- Part B – Your detailed response

Part A: Personal Details		
	1. Personal Details *	2. Agent's Details (if applicable)
Title	Messrs	
First name		
Last name	Willan, Velluet	
Job title (where relevant)		
Organisation (where relevant)	Old Deer Park Working Group	
Address		
Postcode		
Telephone		
E-mail address		

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

Part A: About You...
<p>The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. This submission represents the joint response from the Group.</p> <p>The Group was formed in 2012 in recognition of the particular ecological, historical and recreational importance of the Old Deer Park and has since then worked for encouraging and securing the preparation of a coherent strategy for the effective conservation, development and management of the Park. In June, 2012, the Group published its report: The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement. Since then, it has made a number of submissions to the Council on related issues. In this connection and importantly, the Group worked collaboratively with the Council and its consultants on the preparation of the Old Deer Park Supplementary Planning Document (as published in March, 2018). The Group has also worked, and continues to work, collaboratively with the Council on the planning and implementation of projects for the enhancement of the Park, including the recently completed, award-winning scheme for improvements at and adjacent to the Park Lane entrance to the Old Deer Park Car-park. The Group is currently working with the Council to link the Old Deer Park car park with the river Thames along the area between the A316 road and the railway. It is working with the Council on tree planting and with Thames Landscape Strategy in rewilding the ODP section of Thames Arcadia.</p>

<b>3. Please tell us about yourself or who you are responding on behalf of...( tick all which apply)</b>		
Do you live in the borough?	Yes X	No G
Do you work in the borough?	Yes G	No G
Do you run a business in the borough?	Yes G	No G
Are you a student in the borough?	Yes G	No G
Are you a visitor to the borough?	Yes G	No G

### Data protection

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

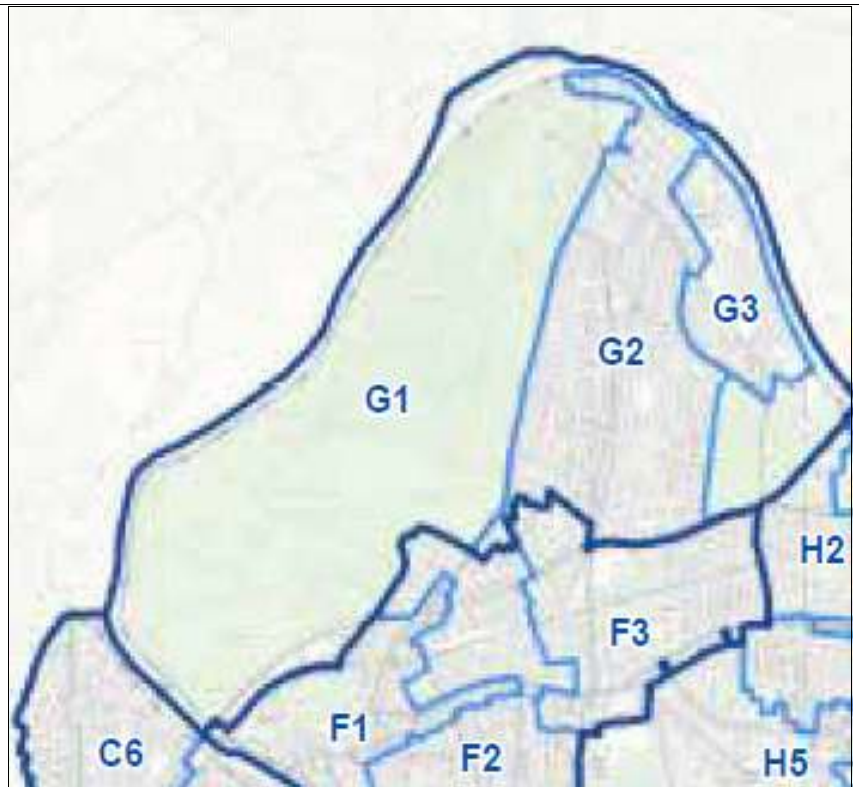
The Council's Privacy Notice is published on the webpage [www.richmond.gov.uk/data\\_protection](http://www.richmond.gov.uk/data_protection)

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

### Part B: Your General Views

1. **Place Definitions.** Based on Section 3 – Character Areas in Arup's 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area 'G1 – Kew Gardens and Riverside' under the overall heading 'G –Kew'). Like Richmond Park, the Old Deer Park should be covered by its own Character Area as 'F4 – The Old Deer Park', under the overall heading of 'F – Richmond & Richmond Hill (sic)'. On this basis, other sections of Arup's Urban Design Study and to the Draft Local Plan need to be adjusted accordingly.
2. Indeed, more fundamentally, the proposed structure of 'Character Areas' as set out in Section 3 et seq. in Arup's Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. They should surely be based for the most part on the present conservation areas and in this case the Old Deer Park Conservation Area.
3. Confusingly, the extant 'Richmond & Richmond Hill Village Plan' (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD.
4. We have extracted the Character Area Map from Arup's Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.





Kew Character Areas (G1 ODP). Urban design Study Dec 2021

- Conservation Area 1: Kew Foot Road
- Character Area 2: The Pagoda Triangle
- Character Area 3: North of Lower Mortlake Road
- Character Area 4: South of Lower Mortlake Road
- Conservation Area 5: Sheendale Road
- Character Area 6: Old Gas Works
- Character Area 7: Between Lower and Upper Richmond Road
- Character Area 8: Kings Farm Avenue and surrounds
- Character Area 9: Queen's Road Estate
- Character Area 10: Queen's Road (west side)
- Conservation Area 11: St Matthias
- Conservation Area 12 Richmond Hill
- Conservation Area 13: Richmond Riverside
- Conservation Area 14: Richmond Green
- Conservation Area 15: Central Richmond
- Conservation Area 16: Sheen Road
- Character Area 17: Old Deer Park Gardens
- Conservation Area 18: Old Deer Park



Conservation Areas Richmond & Richmond Hill Village Plan

5. Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. **Needs remedying.**
6. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. **Needs remedying.**
7. Section 15 in the un-headed list of contents – titled 'Policies' - doesn't contain anything other than one photograph. Instead, the policies are set out in Sections 4 and 16 to 26 inclusive. **Needs remedying.**
8. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. **Needs remedying.**
9. Neither Section 2 nor Section 15 appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. **The omission needs to be urgently remedied.**
10. So much in the Draft Local Plan derives from questionable analysis and recommendations in Arup's Urban Design Study and, in more limited part, this in Arup's 156-page Metropolitan Open Land Review Annex Report. **Indeed, all these need to firmly challenged.**
11. The Arup MOL Review Annex Report;
  - a Parcel 28 page 92 is titled Little Green. **It should be Richmond Green,**
  - b Parcel 31 page 101 is titled Thames Old Deer Park. **It is not part of the Old Deer Park.**
12. **Sustainable Growth.** We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to **Policy 18.**
13. In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise "Improvement" as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.

14. **Climate Change Emergency.** We welcome the increased emphasis given to climate change and pollution.
15. **Culture.** We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council's Culture Richmond 2021-2031 Plan. We understand the Council expect to undertake a further Sports Review in 2022.
16. **High Rise development.** We are concerned at the support given for high rise development at the Richmond Station and elsewhere given the potential for interrupting views and vistas that are so important to the Old Deer Park. We comment on **Site Allocation 24 Richmond Station and Policy 45 Tall and mid-rise Building zones.**
17. **Site Allocation.** We respond here on **Site Allocations 32 and 28** and raise a number of concerns.
18. **MOL.** We respond here on MOL status and boundary anomalies and seek to remove any question of an important part of the Old Deer Park ceasing to being designated as MOL, as raised in Arup's MOL Review Annex Report. We comment further on **Policy 35 Green Belt, Metropolitan Open Land and Local Green Space.**
19. **Specific Policies.** We respond here to Policies **28, 29, 30, 35, 37, 43, 44 and 45.**
20. **Heathrow noise.** We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re- allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the **Introduction paragraphs 2.44 and 2.45.**
21. **Richmond Town.** We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Prospect of Richmond on Richmond Town to be considered alongside this response from the Old Deer Park Working Group on the Old Deer Park.

<b>4. Do you agree or disagree with the Strategic Vision? (section 3)</b>				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.				
<b>5. Do you agree or disagree with the Strategic Objectives? (section 3)</b>				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.				
<b>6. Do you agree or disagree with Policy 1. Living Locally and the 20-minute neighbourhood? (section 4)</b>				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with Policy 1 and the 20-minute neighbourhood.				
<b>7. Do you agree or disagree with Policy 2. Spatial Strategy: Managing change in the borough? (section 4)</b>				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with Policy 2, Spatial Strategy: Managing Change in th borough.				
<b>8. Do you agree or disagree with the place-based strategies? (sections 6 to 14)</b>				
Strongly Agree G	Agree G	Neither Agree/Disagree G	Disagree X	Strongly Disagree
Any Comments: Our response here on the Place-based Strategy: Kew and on Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree.				



**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	X	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	12. Kew (Kew Gardens and Riverside)
		Site Allocation(s) no./name	32. The Pools-on-the Park and Surroundings, Old Deer Park, Richmond
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Urban Design Study December 2021 (Character Area G1)	
		Old Deer Park Conservation Area Statement	
		Old Deer Park: The Crown Estate Landscape Strategy 1999	
		Old Deer Park Supplementary Planning Document 2018 Draft Statement of Significance	
		Old Deer Park: The Crown Estate Landscape Strategy 1999	
		Old Deer Park Supplementary Planning Document 2018	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response:**

**Site Allocation 32 - The Pools-on-the-Park and Surroundings, Old Deer Park, Richmond**

The fourth bullet-point in the draft text needs to be amended to refer to the fact that at present the Statement of Significance is only in an incomplete draft form and needs to be amended before formal adoption in order to take full account of the particular special interest and significance of the listed pools complex and its landscaped setting. (In this connection, the Old Deer Park Working Group has been pressing the Council to undertake such amendment repeatedly since March, 2018. The text also needs to take account of the repeated requests by the local community over the last forty years for the Pools complex and its surrounding landscaped setting to be designated as Metropolitan Open Land, like the parkland which surrounds them).

End

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Response 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	X	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	12. Kew (Kew Gardens and Riverside)
		Site Allocation(s) no./name	33. Richmond Athletic Association Ground, Old Deer Park, Richmond
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Urban Design Study December 2021 (Character Area G1)	
		Old Deer Park Conservation Area Statement	
		Old Deer Park: The Crown Estate Landscape Strategy 1999	
		Old Deer Park Supplementary Planning Document 2018	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response:**

**Site Allocation 33 - Richmond Athletic Association Ground, Old Deer Park, Richmond**

No change proposed.

End

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Response 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	28 Local character and design quality (Strategic Policy)
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 28 – Local character and design quality (Strategic Policy)**

The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework .

The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	29 Designated heritage assets
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Policy 29 – Designated heritage assets**

No change proposed.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.



**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	30 Non-designated heritage assets
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Policy 30 – Non-designated heritage assets**

No change proposed.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	35 Green Belt, Metropolitan Open Land and Local Green Space
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Policy 35 – Green Belt, Metropolitan Open Land and Local Green Space**

Under the heading ‘Proposed changes to the Policies Map’ the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under ‘Policies Map for the Local Plan Review, 2015-2018’ in the part of the Council’s current Planning Policy web-site dealing with the current ‘Adopted Local Plan’ (adopted in July, 2018), it is clearly stated that ‘The Council’s Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020’. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.

(In Arup’s 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 ‘Parcel’ (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens ‘Parcel’ – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside ‘Parcel’ – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the

south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that 'the eastern third of the parcel, is developed and does not meet the MOL criteria' and that its MOL status should be considered further. The parcel is certainly NOT 'largely inaccessible to people' as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.

In relation to the The Green and Little Green, Richmond 'Parcel' – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of *The Buildings of England – London 2: South* as 'one of the most beautiful urban greens surviving anywhere in England', Richmond Green possesses not only considerable architectural, historic and landscape interest and significance, but importantly, constitutes a public open space of outstanding amenity value to the local and wider community.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	37 Public open space, play, sport and recreation
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 37 – Public open space, play, sport and recreation - No change proposed.**

No change proposed.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.



**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	43 Floodlighting and other external artificial lighting
		Place-based strategy	
		Site Allocation(s) no./ name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 43 – Floodlighting and other external artificial lighting**

No change proposed.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	44 Design Process
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 44 – Design Process**

The wording of Part B of the Policy needs to be amended to omit reference to ‘the design guidance for the relevant character area as specified within the Urban Design Study 2021’ insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in ‘F. Richmond and Richmond Hill’ (on page 255).

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	45 Tall and mid-rise zones
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 45 –Tall and mid-rise zones**

The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a ‘Tall’ or ‘Mid-rise’ buildings. Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of ‘Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3\* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading ‘F. Richmond and Richmond Hill’ relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). \* In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.

Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that ‘Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land’ has no relevance at all to the existing urban character of Richmond, its sustainable

development, its enhancement or the provision of 'affordable housing' for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.



**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Draft new Local Plan Introduction Section 2.44 and 2.45 Heathrow	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Draft new Local Plan Introduction Section 2.44 and 2.45 Heathrow**

The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that *'The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights,..'* *'The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.'*

There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect.

Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).

There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.

There are other national noise policies that could be deployed to deal with Heathrow noise.

At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.

Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.

We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

Signed on behalf of The Old Deer Park Working Group,  
Peter Willan, Chair  
Paul Velluet, member of the executive committee  
31 January 2022

# DRAFT LOCAL VIEWS SUPPLEMENTARY PLANNING DOCUMENT (SPD)

## Richmond-Upon-Thames Council (the Council) Consultation Response from The Old Deer Park Working Group (ODPG) 5 September 2022 DRAFT PW

### INTRODUCTION

This response is written on behalf of the Old Deer Park Working Group. The ODPG comprises five societies: The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margarets Estate Residents Association. The Group was established in 2012 to encourage the effective conservation and improvement of the Old Deer Park. We work closely with the Council's Parks and Tree Teams on several projects to preserve and enhance the ODP and are in the process of progressing with the Council a Tree Planting Plan for the ODP, which includes recognising views and vistas.

Stretching from Richmond to Kew Gardens, the Old Deer Park has evolved over more than seven centuries from a private royal domain to the metropolitan open space it is today. Views and vistas to and from and within the Old Deer Park and to/from are a very important feature of the park and their status as a conservation area.

The Kim Wilkie Strategy for the Crown Estate, who owns the ODP, identified a number of views and vistas from the King's Observatory and these have been referred to in the ODP SPD 2018. The adopted and proposed new views in the draft Local Views SPD takes account of only some of these views. In this response we refer to these additional linear views and also a 360 degree landscape view from within the ODP, which we explain later. We understand that the ODP Conservation Area Study will be refreshed in the near future along with other Conservation Area Studies in the borough. It will be important to integrate the Local Views SPD with the ODP Conservation Area Statement and Management Plan.

Some of the adopted and new proposed views require gaps and some of these are currently impeded by trees and vegetation which we identify in this response.

We have approached the subject of views in the context of the Local Plan Policy LP5 and the relevance of the views to the setting of Heritage assets and to visual amenity. LP5 Views and Vistas says *'Seeks to protect and improve the quality of views, vistas, gaps and the skyline which contribute significantly to the character and quality of the local and wider area.'*

For ease of reference we include in the Annex the data sheet for each of the adopted and new views proposed. The Friends of Richmond Green are also responding to the consultation and we recommend cross referencing with their response. Their focus is on the Richmond Green and Riverside Conservation Areas but when discussing Views they should not be confined to one or other Conservation Area.

**In summary, the ODPG support the continuation of the adopted views and the proposed new views listed in the draft Local Views SPD and recommend some additional linear and landscape views for consideration. We also recommend ongoing maintenance of gaps in the landscape to preserve the views; we have sought to identify where these are currently impeded or are likely to be.**



## SELECTED VIEWS FROM DRAFT SPD RELEVANT TO THE OLD DEER PARK

C5.1	Twickenham Bridge (north-east)	Prospect	
C5.2	Twickenham Bridge (south-east)	Prospect	
C6.1	Richmond Lock & Weir	Prospect	
C6.2	St Margarets Riverside	Prospect	
C6.3	View of the Great Pagoda St Margarets	Linear	
G1.1	Kings Observatory, Old Deer Park	Linear	
G1.2	King's Observatory towards Kew Gardens	Linear	New
G1.3	Kings Observatory towards Richmond Town Centre	Linear	New
G1.11	Old Deer Park Riverside	Prospect	New

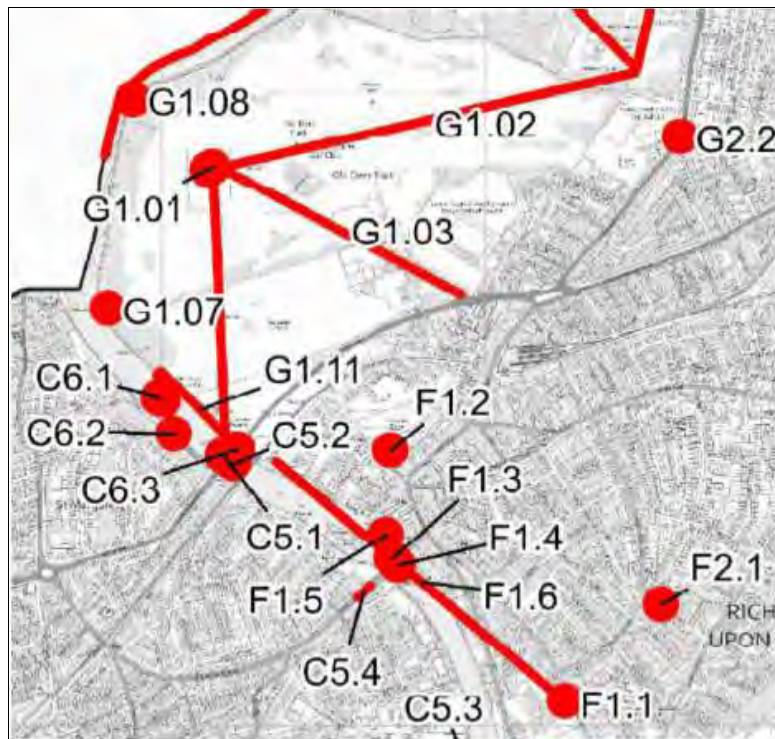
### PRESENTATION

1. We wish to make some suggestions on presentation to provide clarity and accuracy so that those less familiar with a view can be sure of the facts.
  - a. Most images for the views display a marker for the viewing location but G1.11 *Old Deer Park Riverside* omits any marker?



**Figure 1**  
Marker at  
Viewing  
Location

- b. Prospect views understandably do not have a single line showing the direction of a wide landscape, parkscape or riverscape view without a specific end point but linear views do, except C6.3 *View of the Great Pagoda, St Margarets (Linear Adopted)* ?
- c. The viewing location for the views appears to be variable even when there is a view marker - spread over an area, e.g. C6.2 *St Margarets Riverside Ranelagh Drive and surrounding paths (Prospect Adopted)*, and G1.11 *Old Deer Park Riverside (Prospect New)*.
- d. Local Views map
  - i. Detail in the map is insufficient to be able to identify viewing locations and specific view end points (often the end points can be guessed at but not for all of the views).
  - ii. It would seem the map shows all four linear views relevant to the ODPG with a line. The map is busy with views and it would help to distinguish the views by having directional arrows on the lines and an arrow for each of the non-linear views.



**Figure 2** Extract from Local Views Map July 2022 for consultation

- e. Consistency on titles of views could be improved. Most of the titles start with the viewing location, e.g. Richmond Bridge. But 6.3 is titled *View of the Great Pagoda, St Margarets*. G1.1 is titled *King's Observatory, Old Deer Park* and we suggest it would be better titled '*King's Observatory towards stone obelisks*', however there is some uncertainty as to the exact view G1.1 portrays.
- f. Images for improvement:  
 G1.2 *King's Observatory view towards Kew Gardens (Linear New)* and G1.3 *King's Observatory view towards Richmond Town centre (Linear New)*, have yet to be provided by the Council and so our support is provisional at this stage.

### **TREE MANAGEMENT NEEDED TO IMPROVE VIEWS**

1. C6.3 *View of the Great Pagoda, St Margarets (Linear Adopted)*. The Pagoda cannot be identified in the image Figure 3 overpage. The Pagoda is hidden by tree growth on the riverbank and in the ODP. Figure 4 is a view from the marker on the Richmond Riverside by Twickenham Bridge. The Pagoda is directly behind the clump of trees in the centre of the image. The Old Deer Park Working Group are in discussion with the Council Parks Team about re-instating this and other views within and to and from the Old Deer Park.



**Figure 3** C6.3 View of Great Pagoda, St Margarets Linear Adopted



**Figure 4** C6.3 Linear view of Pagoda blocked by trees

2. *G1.1 King's Observatory, Old Deer Park Linear Adopted*

We suggest that the View from the King's Observatory to the stone obelisks needs further opening of the gap along the boundary of ODP Recreation Ground and Royal Mid Surrey Golf Course. Some work has been undertaken in the recent past. The ODPG is liaising with the Council's Parks Team and others. The Image Figure 5 provided with the SPD is not in the right line between the Observatory and the stone obelisks but it shows the gap.



**Figure 5** G1.1 King's Observatory, to stone Obelisks showing gap

## NEW VIEWS PROPOSED BY ODPG

### 1. Old Deer Park Views Landscape

We suggest a 360 degree approach to views be adopted for the Recreation Ground of the Old Deer Park. Figure 6 shows a typical uninterrupted view to the south west from within the ODP as an example. Figures 7 and 8 show where the ODP 360 degree view has been interrupted and we suggest a 360 degree view is needed to protect further interruptions.



**Figure 6** Example of ODP skyline to south-east



**Figure 7** Example of ODP skyline to north west with tall building interrupting view



**Figure 8** Example of ODP skyline to south east with tall building interrupting view

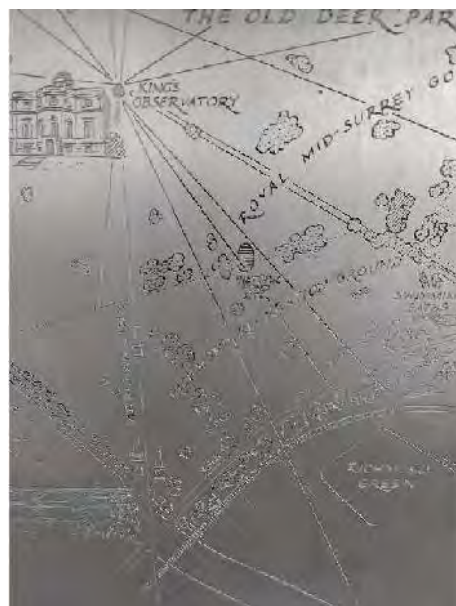


2. **Old Deer Park Linear**

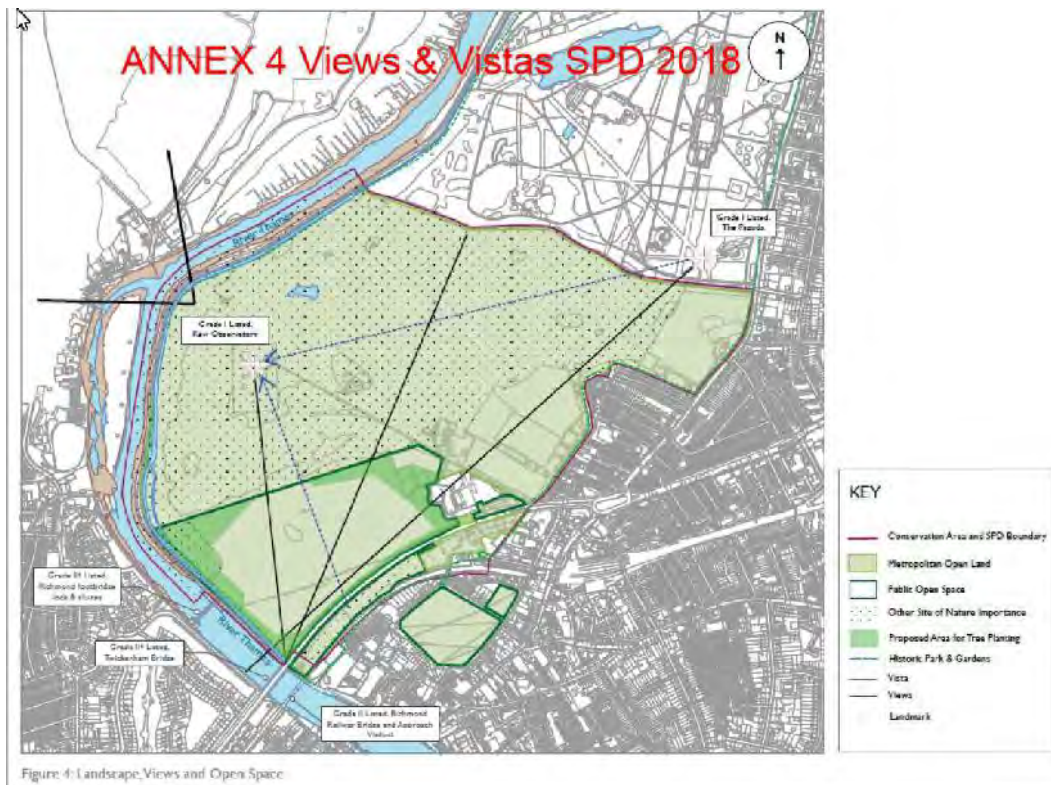
The Crown Estate Strategy for the Old Deer Park proposes a number of linear views from the King's Observatory. One has already been adopted G1.1 *King's Observatory to stone obelisks*. Two are proposed by the SPD G1.2 *King's Observatory towards Kew Gardens* and G1.3 *King's Observatory towards Richmond Town Centre*. But from the Crown Estate map others should be considered. The Old Deer Park SPD 2018 replicated some of these, see Figure 11.



**Figure 9** ODP Strategy 1999 Crown Estate Views from the King's Observatory and Syon House



**Figure 10** ODP Crown Estate Strategy views & vistas Source Riverside markers



**Figure 11** ODP Landscape Views and Open Space. Source ODP SPD 2018

The ODP SPD 2018 makes a number of important points about views and vistas: Page 23 says ‘There are a number of important Views and Vistas across the Park. These are primarily related to The King’s Observatory and the related meridian lines, (which are denoted by a number of obelisks located at different points within the Park) and to the Pagoda within the Royal Botanic Gardens, Kew (which is a Grade I Listed Building and is a landmark within the wider area). However, these have been obscured over the course of time, including as a result of the encroachment of scrub vegetation along the towpath and within the Royal Mid-Surrey Golf Club. In addition tree overhang along the towpath including between, the Old Deer Park Recreation Ground and the Royal Mid-Surrey Golf Club also has an impact. There are real opportunities to improve/open up these views and vistas by appropriate removal or pruning of trees and vegetation although there are some areas where this needs careful consideration to ensure that it doesn’t result in disturbance to important fauna. ‘Grow back’ has occurred following previous clearance works. There is therefore a need to introduce a regular maintenance regime for these areas.’

*In particular there are opportunities to provide information on, and better identify the views to The King’s Observatory from within the Park and from adjacent areas. This could reflect the approach taken by the Crown Estate ‘marker’ on the towpath. However, these are need of maintenance.*

In regard to the Richmond Athletic Association Ground (ODP) the SPD discusses the re-development of the grandstand and the potential for improving views from the King’s Observatory but also possible adverse impacts on other views. There is also discussion on improvement of the Old Deer Park car park and beneficial impact on views. The ODPG would welcome the opportunity of working with the Council in



identifying the additional linear views that might be considered based on the Crown Estate's Strategy.

3. **Twickenham Road Footbridge to St Matthias Church Spire (Linear)**

St Matthias Church spire is a significant landmark with views from many parts of south-west London. Figures 12 and 14 shows a view from the Twickenham Road Footbridge and another from within the ODP Recreation Ground. Figure 13 shows a view from Richmond Green. We suggest consideration be given to adopting one or more of these views.



**Figure 12** Twickenham Road Footbridge view to St Matthias Church, Richmond Hill



**Figure 13** Richmond Green view to St Matthias Church, Richmond Hill



**Figure 14** ODP view to St Matthias Church, Richmond Hill

4. **Richmond Hill to King's Observatory Old Deer Park (Linear)**

Views involving the King's Observatory are usually linear views from the Observatory but Figure 15 shows a view from near the top of Richmond Hill at the junction between Montague Road and Friars Stile Road. We have not had the time to confirm the view but it is probably the only view from Richmond Hill and we suggest consideration be given to its adoption.



**Figure 15** Richmond Hill  
(Montague Road) to King's  
Observatory ODP

Peter Willan, BScEng(Hons), MBA, ARSM, FCMA, FEI, HonRCM,  
Chairman, The Old Deer Park Working Group.

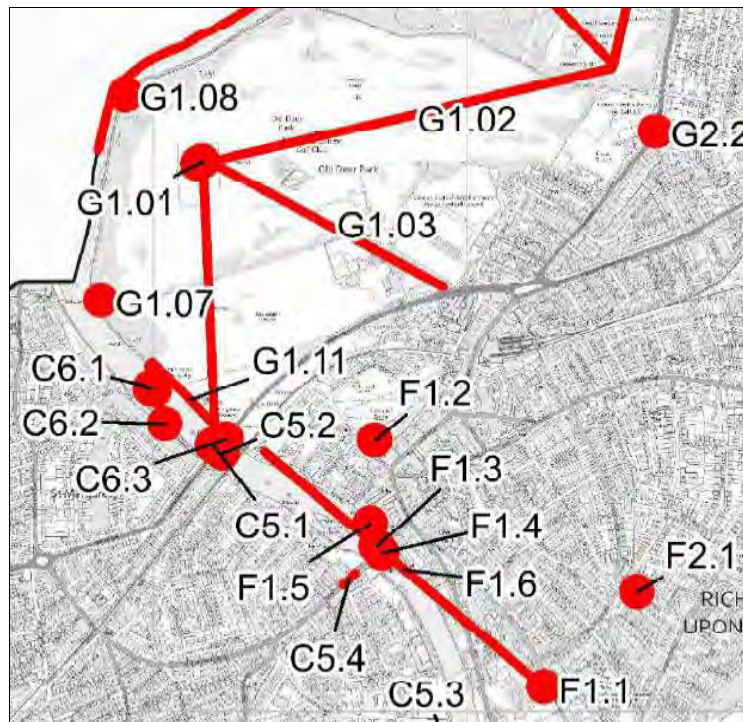
Paul Velluet, B.A.Hons, B.Arch. Hons, M.Litt., RIBA, IHBC, Chartered Architect,  
Member of the Old Deer Park Working Group

Contact [REDACTED]

Annex attached: View Data Sheets



**ANNEX**  
**SELECTED VIEWS FROM DRAFT SPD RELEVANT TO THE OLD DEER PARK**



**Figure 1** Extracted from Local Views Map July 2022 for consultation

- C5.1 Twickenham Bridge (north-east), Prospect
- C5.2 Twickenham Bridge (south-east), Prospect
- C6.1 Richmond Lock & Weir, Prospect,
- C6.2 St Margarets Riverside, Prospect
- C6.3 View of the Great Pagoda St Margarets, Linear
- G1.1 Kings Observatory, Old Deer Park, Linear
- G1.2 King's Observatory towards Kew Gardens, Linear
- G1.3 Kings Observatory towards Richmond Town Centre, Linear
- G1.11 Old Deer Park Riverside, Prospect

Character Area Name:

## East Twickenham Residential

View Name and Reference:

### Twickenham Bridge (north-east) (C5.1)

View Type:

**Prospect**

#### Description of View

View from Twickenham Bridge (north-east); travelling into London, spectacular view open up from both the railway and road bridge; encompassing:

- (left) the Victorian Richmond Lock and Weir and the open landscape of the Old Deer Park (usually flooded in winter);
- (left) glimpsed views of the King's Observatory may be possible in the winter;
- (centre) Old Palace Yard river front gardens; and, Richmond Riverside terraces and commercial activity; and,
- (right) view along the River Thames toward Richmond Hill, the Terrace Gardens, and Petersham Meadows.



**View:** C5.1



**GIS Mapping:** C5.1

Viewing Place:

**Bridgescape view (wide)**

Viewing Location:

**Twickenham Bridge**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 9, 10 and view 11 (from Richmond Bridge to Twickenham Bridge)**

**Adopted Local Plan landmarks – Twickenham Bridge, Richmond Lock, Kew Observatory**

#### Visual Management Guidance

Foreground:

Twickenham Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames: urban and landscape character

Background:

Richmond Town Centre buildings (rising on Richmond Hill);  
Richmond Bridge

Character Area Name:

## East Twickenham Residential

View Name and Reference:

### Twickenham Bridge (south-east) (C5.2)

View Type:

**Prospect**

#### Description of View

View from Twickenham Bridge (south-east); travelling out London, spectacular view open up from both the railway and road bridge; encompassing:

- a) (left) Corporation Island, private gardens and moorings edging the River Thames; and,
- b) (right) Ranelagh Drive and St Margarets Riverside.



**View:** C5.2



**GIS Mapping:** C5.2

Viewing Place:

**Bridgescape view (wide)**

Viewing Location:

**Twickenham Bridge**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 9 to 12**

**Adopted Local Plan landmark – Twickenham Bridge**

#### Visual Management Guidance

Foreground:

Twickenham Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames: landscaped embankment and parklands

Background:

Residential housing and gardens



Character Area Name:

## St Margarets Residential

View Name and Reference:

### Richmond Lock and Weir

(C6.1)

View Type:

Prospect

#### Description of View

Long view from Richmond Lock and Weir (Grade II\*); encompassing:

- a) (north) along the River Thames towards Isleworth Ait including winter view into the Old Deer Park and towards the King's Observatory and Kew gardens; and,
- b) (south) along towards the Star and Garter and Richmond Hill; framed view under numerous bridges.



View: C6.1



GIS Mapping: C6.1

Viewing Place:

Riverscape view (wide)

Viewing Location:

Richmond Lock and Weir's pedestrian walkway

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

Adopted Local Plan landmarks – Richmond Lock, Kew Observatory, Star and Garter Urban Design Study

**New view (proposed)**

#### Visual Management Guidance

Foreground:

Richmond Lock and Weir: Victorian cast iron metal work, industrial and decorative; elevated view over the river

Middle ground:

River Thames

Background:

The River Thames (bend in the river eventually creates a landscape closure to view); Richmond Hill to the south



Character Area Name:

## St Margarets Residential

View Name and Reference:

### St Margarets Riverside

(C6.2)

View Type:

Prospect

#### Description of View

Sequential views from multiple locations along Ranelagh Drive in St Margarets along the River Thames and towards Twickenham Bridge. The wooded boundary to the Old Deer Park allows filtered views through to the open space beyond.



View: C6.2



GIS Mapping: C6.2

Viewing Place:

Park and riverscape view (wide)

Viewing Location:

Ranelagh Drive and surrounding riverside paths

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

**New view (proposed)**

Urban Design Study

Adopted Local Plan landmarks – Twickenham Bridge, Richmond Lock

#### Visual Management Guidance

Foreground:

Ranelagh Drive and surrounding riverside paths

Middle ground:

Richmond Lock and River Thames

Background:

Old Deer Park

Character Area Name:

## St Margarets Residential

View Name and Reference:

### View of the Great Pagoda, St Margarets

(C6.3)

View Type:

Linear

#### Description of View

View from Twickenham Bridge, St Margarets towards the Great Pagoda in the Royal Botanical Gardens Kew. Long-distance view across open parklands, sport buildings and facilities with mature trees against skyline within the Royal Botanical Gardens Kew.



**View:** C6.3



**GIS Mapping:** C6.3

Viewing Place:

Directional/ Point view (specific)

Viewing Location:

Twickenham Bridge

Viewing Co-ordinates:

E: tbc

N: tbc

Reference Policy:

Adopted Local Plan

Urban Design Study View 4

Adopted Local Plan landmark – Great Pagoda

#### Visual Management Guidance

Foreground:

Twickenham Bridge (Old Deer Park border)

Middle ground:

Old Deer Park sport buildings and Richmond athletic grounds

Background:

Mature trees against skyline within the Royal Botanical Gardens Kew

Character Area Name:

## Kew Gardens and Riverside

View Name and Reference:

### King's Observatory, Old Deer Park

(G1.1)

View Type:

Linear

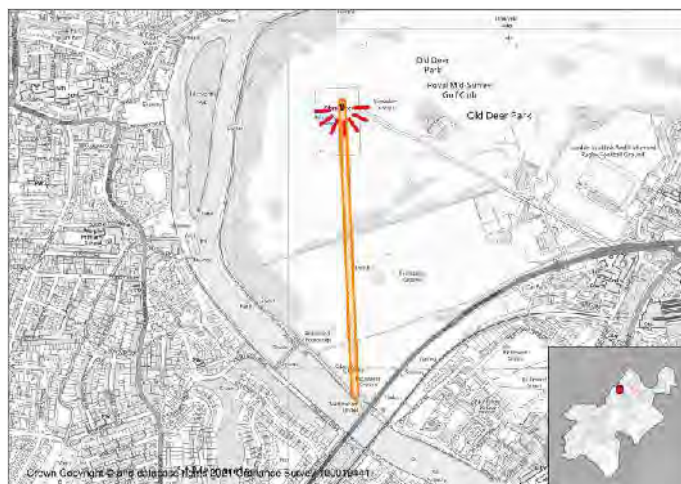
#### Description of View

View from the King's Observatory, 1769 (Grade I) through a retained gap in the mature tree planting along the Meridian Line towards the stone obelisks. The three obelisks which stand in the Old Deer Park are meridian marks set up for the purpose of adjusting the transit instruments in the Observatory, one pillar corresponding to the east wing of the building, one to the west wing and the solitary obelisk, along the towing path towards Brentford, indicating the true north point of the Observatory.

Additional meridian line marks can be found on the Thames Pathway: (south) near Twickenham Bridge; and, (north) near Syon Park Pavilion (Grade I).



View: G1.1



GIS Mapping: G1.1

Viewing Place:

Directional/ Point view (specific)

Viewing Location:

King's Observatory

Viewing Co-ordinates:

E: tbc

N: tbc

Reference Policy:

Adopted Local Plan

Urban Design Study: vista 13

Adopted Local Plan landmark – Kew Observatory

Registered Parks and Gardens: Old Deer Park incorporated as part of Royal Botanic Gardens Kew Park and Garden (Grade I)

#### Visual Management Guidance

Foreground:

Terrace to the building; landscaped fairways and pond of the Royal Mid-Surrey Golf Club

Middle ground:

Old Deer Park

Background:

(South) Twickenham Bridge

(North) River Thames

Character Area Name:

## Kew Gardens and Riverside

View Name and Reference:

### King's Observatory towards Kew Gardens

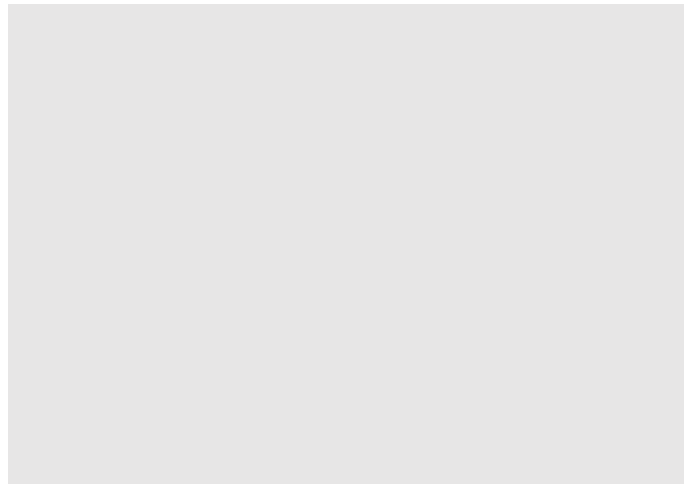
(G1.2)

View Type:

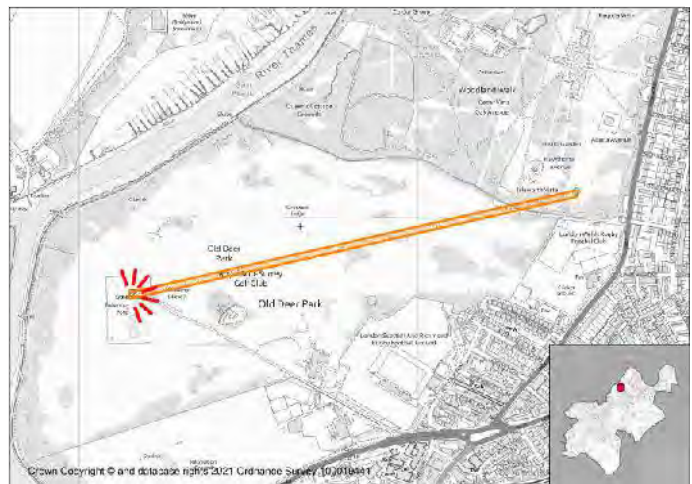
Linear

#### Description of View

View from the King's Observatory across the surrounding landscape (Royal Mid-Surrey Golf Club fairways and tree belts) towards the Great Pagoda which rises above the surrounding trees in Kew Gardens. Both the King's Observatory (1769) and the Great Pagoda (1762) were designed by Sir William Chambers for King George III.



**View:** G1.2 - photo to follow (when access attainable)



**GIS Mapping:** G1.2

Viewing Place:

Directional/ Point view (specific)

Viewing Location:

Terrace to the King's Observatory

Viewing Co-ordinates:

E: tbc

N: tbc

Reference Policy:

Adopted Local Plan

Urban design Study: vista 12

Adopted Local Plan landmark – Kew Observatory

Royal Botanic Gardens Kew Management Plan (2020-2025)

#### Visual Management Guidance

Foreground:

Terrace to the King's Observatory

Middle ground:

Landscaped fairways of the Royal Mid-Surrey Golf Club

Background:

Royal Botanic Gardens, Kew



Character Area Name:

## Kew Gardens and Riverside

View Name and Reference:

### King's Observatory towards Richmond Town Centre

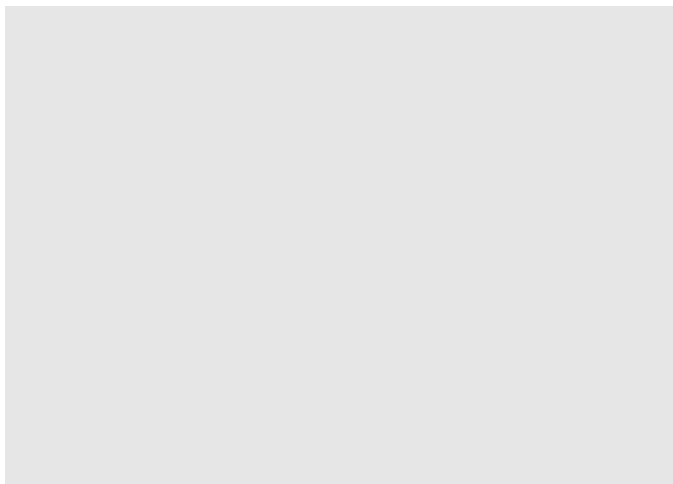
(G1.3)

View Type:

Linear

#### Description of View

Partially structured view from the King's Observatory towards Richmond Town Centre along the Royal Mid-Surrey Golf Course's approach road (up to Twickenham Road (A316)). View partially structured with avenue of trees and hedge planting; breaks in planting allow view over golf course fairways and sport grounds.



**View:** G1.3 - photo to follow (when access attainable)



**GIS Mapping:** G1.3

Viewing Place:

Directional/ Point view (specific)

Viewing Location:

Terrace to the King's Observatory

Viewing Co-ordinates:

E: tbc

N: tbc

Reference Policy:

Adopted Local Plan landmark – Kew Observatory

New view (proposed)

#### Visual Management Guidance

Foreground:

Terrace to the King's Observatory

Middle ground:

Landscaped fairways of the Royal Mid-Surrey Golf Club

Background:

Richmond Town Centre

Character Area Name:

## Kew Gardens and Riverside

View Name and Reference:

### Old Deer Park riverside

(G1.11)

View Type:

**Prospect**

#### Description of View

Views along the River Thames and across the Old Deer Park from the Thames Path/Capital Ring path between Twickenham Bridge and Richmond Lock Bridge. Views encompass the following:

- A view marked by paving and an obelisk on the footpath along the Meridian line on the Capital Ring riverside path near Twickenham Bridge, towards the King's Observatory. Two interpretation panels on the towpath interpret the Meridian for passers-by.
- Open views from footpath as the banks are close mown lawn.
- Views across Old Deer Park through gaps in the boundary trees across the ditch.
- Views ahead along the towpath become more wild as the path becomes more wooded in character further north.



**View: G1.11**



**GIS Mapping: G1.11**

Viewing Place:

**Riverscape view (wide)**

Viewing Location:

**River Thames Pathway**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Urban Design Study**

**Adopted Local Plan landmarks – Twickenham Bridge, Richmond Lock, Kew Observatory**

**New view (proposed)**

#### Visual Management Guidance

Foreground:

**River Thames Pathway**

Middle ground:

**River Thames**

Background:

**Old Deer Park**

Off

Extracts from the [Consultation Statement](#) – comments from Prospect of Richmond, FoRG and the ODPWG

(Note there were separate tables with responses to some of the specific questions raised in the consultation, with the last table showing all the detailed responses in Plan order.)

Table 1: All responses received (to question 4 on the [response form](#)) in relation to the strategic vision (section 3 of the draft Plan) (as received) and the Council's officer response

Rep No.	Name	Comment	Council's response
12	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.	Support noted.
42	Vivien Harris, Friends of Richmond Green	<p>The Friends of Richmond Green (FoRG) is an amenity action group. Our key aims and objectives are:</p> <ul style="list-style-type: none"> <li>• to promote public interest and civic pride in Richmond Green and vicinity</li> <li>• to improve the quality of life and long-term attractiveness for residents</li> <li>• to improve the character and quality of the built and natural environments</li> <li>• to improve the cleanliness and appearance of the streets and public spaces</li> <li>• to contain traffic while recognising the parking needs of residents and visitors</li> <li>• to encourage responsible use of The Green and surrounding area</li> </ul> <p>FoRG as an amenity group is over 50 years old and is run by an executive committee based on a formal constitution. The Friends of Richmond Green fully endorse and support the response by Prospect of Richmond to the new draft Local Plan. We have read the response and have been engaged with the respondents on the content. For clarification, the response is a Prospect of Richmond response with Friends of Richmond Green support and endorsement.</p>	Noted.
45	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.	Support noted.

Table 2: All responses received (to question 5 on the [response form](#)) in relation to the strategic objectives (section 3 of the draft Plan) (as received) and the Council's officer response

Rep No.	Name	Comment	Council's response
58	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.	Noted.

Off

86	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.	Noted.
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Table 3: All responses received (to question 6 on the [response form](#)) in relation to Policy 1. Living Locally and the 20-minute neighbourhood (section 4 of the draft Plan) (as received) and the Council's response

Rep No.	Name	Comment	Council's response
97	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with Policy 1 and the 20-minute neighbourhood.	Support noted.
130	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with Policy 1 and the 20-minute neighbourhood.	Support noted.

Table 4: All responses received (to question 7 on the [response form](#)) in relation to Policy 2. Spatial Strategy: Managing change in the borough (section 4 of the draft Plan) (as received) and the Council's response

Rep No.	Name	Comment	Council's response
141	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with Policy 2, Spatial Strategy: Managing Change in th borough.	Support noted.
163	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with Policy 2, Spatial Strategy: Managing Change in th borough.	Support noted.

Table 5: All responses received (to question 8 on the [response form](#)) in relation to the place-based strategies (sections 6 to 14 of the draft Plan) (as received) and the Council's response

Rep No.	Name	Comment	Council's response
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Off

171	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Our response here on the Place-based Strategy: Richmond Town and Richmond Hill and Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree.	Noted.
198	Peter Willan and Paul Velluet, Old Deer Park Working Group	Our response here on the Place-based Strategy: Kew and on Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree. [See comment 620 on the place-based strategy for Kew]	Noted.

Table 6: All responses received (to questions 9/10/11 on the [response form](#)) in relation to general comments on the Local Plan (detailed policies etc) (as received, in Plan order) and the Council's response

Rep No.	Full Name	Part of plan commenting on	Detailed Comments	Council's response
212	Peter Willan and Paul Velluet, Old Deer Park Working Group	General (in relation to title of the Plan, page numbers)	Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. Needs remedying. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. Needs remedying. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. Needs remedying.	The shortened reference to the Richmond Local Plan is considered acceptable as it is clear it is a boroughwide plan. The main audience is expected to view the Plan online (either as a pdf where the hyperlinks aid navigation and page numbers appear, or using a web-based html version which has a navigation pane), but it is intended that page numbers will be added to the final version.
213	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General (in relation to title of the Plan, page numbers)	Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. Needs remedying. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. Needs remedying. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. Needs remedying.	See response to comment 212.
214	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to Policies Map)	Neither Section 2 nor Section 15 appears to included any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.	Paragraph 2.18 referred to the Policies Map, with the document explaining it indicates the proposed changes to the Policies Map. There was a delay to the update of the existing Policies Map to reflect the Local Plan adopted in July 2018 and March 2020; an <a href="#">interactive map</a> which displays the designations and a <a href="#">PDF version</a> (due to its large file size only a low resolution version is available online).

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215	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to Policies Map)	Neither Section 2 nor Section 15 appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.	See response to comment 214.
217	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to evidence base)	So much in the Draft Local Plan derives from questionable analysis and questionable recommendations in Arup's Urban Design Study and, in more limited part, this in Arup's 156-page Metropolitan Open Land Review Annexe Report. Indeed, all these need to be firmly challenged.	Noted. A relevant and up-to-date evidence base underpins the Plan. See also response to comment 594 regarding the methodology underpinning the Urban Design Study. See also response to comment 929 regarding points raised on the MOL review.
218	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to evidence base)	So much in the Draft Local Plan derives from questionable analysis and recommendations in Arup's Urban Design Study and, in more limited part, this in Arup's 156-page Metropolitan Open Land Review Annexe Report. Indeed, all these need to be firmly challenged.	See response to comment 217.

241	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Paragraphs 2.44 and 2.45, in relation to Heathrow	<p>We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re-allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the Introduction paragraphs 2.44 and 2.45.</p> <p>The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that <i>'The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights...'</i> <i>'The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.'</i></p> <p>There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect.</p> <p>Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).</p> <p>There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.</p> <p>There are other national noise policies that could be deployed to deal with Heathrow noise.</p> <p>At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.</p> <p>Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.</p> <p>We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.</p>	<p>As stated in the Plan, the airport does not lie within the borough boundary and therefore there is not a policy on Heathrow.</p> <p>Update the references to the Council's position to reflect the Corporate Plan 2022 – 2026.</p> <p>The UK Civil Aviation Authority has set out a <a href="#">vision for the future of UK airspace</a> in January 2023 to help deliver quicker, quieter and cleaner journeys, as well as create more capacity for the benefit for those who use and are affected by UK airspace. The aviation and aerospace regulator has developed a refreshed Airspace Modernisation Strategy, which includes measures to introduce environmental sustainability as an overarching principle to be applied through all modernisation activities, and to provide a clear strategic path for regulatory policy and requirements. It makes it clear that the role of airspace modernisation in respect of noise impacts will be considered, and can be responsible for delivering noise reduction where it has an element of control.</p>
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242	Peter Willan and Paul Velluet, Old Deer Park Working Group	Paragraphs 2.44 and 2.45, in relation to Heathrow	<p>We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re-allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the Introduction paragraphs 2.44 and 2.45.</p> <p>The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that <i>'The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights...'</i> <i>'The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.'</i></p> <p>There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect.</p> <p>Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).</p> <p>There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.</p> <p>There are other national noise policies that could be deployed to deal with Heathrow noise.</p> <p>At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.</p> <p>Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.</p> <p>We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.</p>	See response to comment 241.
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278	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to sustainable growth)	<p>Sustainable Growth. We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to Policy 18. In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise "Improvement" as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.</p>	<p>Update the supporting text in section 2 setting out the Strategic Context and Trends to refer to the 2021 census and latest projections. There has been weaker population growth than the ONS had been predicting, but almost three quarters of population growth has been accounted for by those aged 65 and over. The latest GLA projections (2020-based) estimate much lower population growth, to reach 196,714 (identified capacity scenario), a 0.3% change by 2039. However, there remains uncertainty, with the GLA suggesting there could be stronger migration and a rebound from the pandemic. It is clear that population change remains a significant challenge, with a projected change in the age structure of those aged 65+ to increase by 50% by 2039. It is not considered necessary to look at a lower geographical scale for population change, because for example the spending in Zone 1 is not drawn just from the residents of Zone 1.</p>
279	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to sustainable growth)	<p>Sustainable Growth. We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to Policy 18. [see comment 805 in relation to Policy 18] In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise "Improvement" as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.</p>	<p>See response to comment 278.</p>

586 Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)

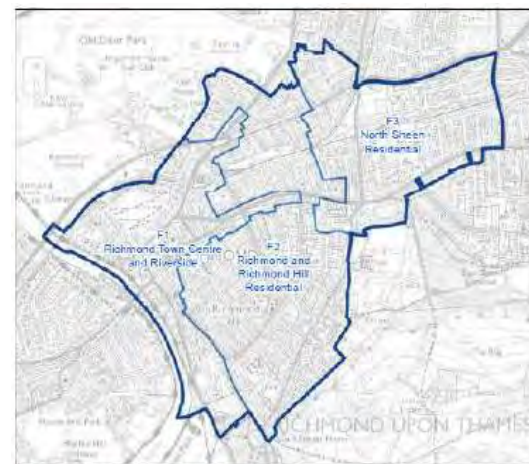
Prospect of Richmond is a group of local residents that have extensive knowledge and experience of living in or near Richmond Town and the surrounding area. Two of us have been past chairs of the Richmond Society and one a past chair of the Friends of Richmond Green and one of us chairs the Richmond Heathrow Campaign comprising the Richmond Society, Kew Society and the Friends of Richmond Green. While not part of this response we have extensive involvement with the adjacent Old Deer Park. Two are architects. Individually and together, we have been involved with many planning, licensing, traffic, heritage, charity, cultural and other matters. We are dedicated to the preserving and improving the area for the benefit of residents and other stakeholders. Over many years we have engaged extensively with Richmond-upon-Thames Council and are keen to continue doing so.

Place Definitions. We refer to Richmond Town as comprising the Conservation Areas for Richmond Town Centre, Richmond Green, Richmond Riverside and Richmond Hill. The use, character and value of the four components of Richmond are very different but it is this diversity, side by side in a relatively small area, that is so valuable. The whole is greater than the sum of the parts.

Local Plan Section 11 heading is 'Place-based Strategy for Richmond & Richmond Hill'. The study area is defined as 'Richmond Town Centre and Riverside, and the residential and mixed use areas into Richmond Hill and North Sheen'. These are character areas F1, F2 and F3 in the Urban Design Study 2021'. 'Richmond Town Centre and Riverside' (F1) is described as including Richmond Green. We believe the four components of Richmond Town should be separately identified in line with the boundaries of the Conservation Areas for Central Richmond, Richmond Green, Richmond Riverside and Richmond Hill and that the character areas should match the Conservation Area boundaries.

Confusingly, the extant 'Richmond & Richmond Hill Village Plan' (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD. We note parts of the two Riverside Conservation Areas are on the Twickenham side of the river Thames whereas the Local Plan boundary appears to be the centre of the river.

We have extracted the Character Area Map from Arup's Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.



Richmond & Richmond Hill. Urban design Study Dec 2021

				<p>Amend text in the character area profile to explicitly refer to the four conservation areas as being at the core of the town centre character area. Conservation areas and character areas represent different judgements and priorities. Whilst conservation areas aim to define aspects of heritage value, character areas aim to define areas of similar character. For consistency and ease of use, in general the character areas in the Urban Design Study 2021 aimed to follow conservation area boundaries wherever possible. However, Richmond was an example of where the conservation areas did not completely align with character – for example Richmond Riverside and Richmond Hill extend across the river into East Twickenham, and part of the Richmond Hill CA covers the riverside. The Richmond Hill CA also extends further to the south-east and encompasses areas which do not have a town centre character. Further, the character area boundary considered the town centre boundary which also does not align with conservation areas boundaries. It is overall considered that the current character areas are appropriate and no further changes are recommended.</p>
587	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Richmond & Richmond Hill	In the un-headed list of contents Section 3 is titled 'Place-based Strategy for Richmond & Richmond Hill' whereas it should be titled as 'Richmond Town Centre and Riverside, Richmond and Richmond Hill Residential and North Sheen Residential' – assuming that one accepts the highly questionable concept and structure of 'Character Areas (sic) as set out in Arup's 432-page Urban Design Study. Needs remedying.	The Urban Design Study divides the borough into nine high level 'places' which have been used to name the place-based strategies, as set out at the start of section 3 in the Urban Design Study. For simplicity these do not replicate in full the names of the 36 locally distinctive character areas. No amendments to the place-making strategy are considered necessary.

588	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Richmond & Richmond Hill in relation to Richmond BID.	We note the explicit reliance on the RBID and its Vision in the Local Plan Section 11 Place-Based Strategy for Richmond and Richmond Hill but we have not been able to find the Vision Report as evidence and are concerned that since the RBID is established by businesses alone and not residents there is likely to be a bias in favour of businesses. Also, the areas covered by the RBID are parts of Richmond Town Centre and not Richmond Green, for example where we wholly oppose commercial use, other than in the context of mixed use along Greenside. We are concerned that the democratic process may be at risk and while we are not saying this is intentional, we believe the matter needs to be resolved going forward. In so far as our response here is concerned, without the evidence we are not able to make a reasoned response on the RBID Vision included in the draft Local Plan at Placed-based Strategy- Richmond and Richmond Hill.	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. Further information about Be Richmond BID can be found on their website: <a href="https://berichmond.london/member-support/about-be-richmond">https://berichmond.london/member-support/about-be-richmond</a> . Note that BIDS are funded by a mandatory levy on eligible businesses after a successful ballot in which businesses vote; the maximum period for the levy is 5 years, and to continue their activities a new ballot must be held. The preparation of the Local Plan and its implementation is the statutory responsibility of the Council in its role as local planning authority, subject to full consultation and independent Examination in line with statutory requirements. It is not considered that any amendments to the policy are required.
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589	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment in relation to Old Deer Park	<p>The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret's Estate Residents Association. This submission represents the joint response from the Group.</p> <p>The Group was formed in 2012 in recognition of the particular ecological, historical and recreational importance of the Old Deer Park and has since then worked for encouraging and securing the preparation of a coherent strategy for the effective conservation, development and management of the Park. In June, 2012, the Group published its report: The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement. Since then, it has made a number of submissions to the Council on related issues. In this connection and importantly, the Group worked collaboratively with the Council and its consultants on the preparation of the Old Deer Park Supplementary Planning Document (as published in March, 2018). The Group has also worked, and continues to work, collaboratively with the Council on the planning and implementation of projects for the enhancement of the Park, including the recently completed, award-winning scheme for improvements at and adjacent to the Park Lane entrance to the Old Deer Park Car-park. The Group is currently working with the Council to link the Old Deer Park car park with the river Thames along the area between the A316 road and the railway. It is working with the Council on tree planting and with Thames Landscape Strategy in rewilding the ODP section of Thames Arcadia.</p> <p>Richmond Town. We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Prospect of Richmond on Richmond Town to be considered alongside this response from the Old Deer Park Working Group on the Old Deer Park.</p>	<p>It is not considered that the Old Deer Park warrants its own character area. The borough-wide study undertaken by Arup as part of the Urban Design Study 2021 is necessarily at a broad scale. A finer grain of detail would be reflected within a more detailed character assessment. It is therefore not considered that any amendments to the existing character areas and boundaries are necessary.</p>
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596	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site allocation 24: Richmond Station, Richmond	<p>Both the title and the draft text of this Site Allocation need substantial amendment.</p> <p>The title should refer specifically not only to the Station, but also to the post-War, multi-storey NCP car-park to the south of the Station, the post-War parade of single-storey shops fronting The Quadrant (at nos. 27.B to 27.G) and the post-War office-block fronting Drummond's Place to the south and south-west of the Station, to the post-War parade of shops fronting Kew Road (at nos. 2 to 8 consec.) and the offices above (Westminster House) to the north of the Station, and the surface-level car-park to the north of the Station. A clear distinction needs to be made between proposals directly affecting the Station (together with the tracks and present day-lit, open-air platforms) and those affecting the other buildings and space referred to above. Whilst such proposals need to be coherent, they need to have regard to the substantially different considerations that apply to the present, very fine, locally listed Southern Railway Station complex (and not merely to its front façade to Kew Road and the upper booking-hall), completed in 1937, which is clearly worthy of statutory listing, together with the very fine 19th century platform-canopies serving platforms 4 and 5 and 6 and 7. Given the particular heritage significance of the Station complex - as distinct from the lack of heritage significance of the other buildings and space around the Station (the multi-storey car-park to the south of the Station, the parade of single-storey shops and the office-block fronting The Quadrant and Drummond's Place to the south and south-west of the station, the parade of shops and the offices above fronting Kew Road to the north of the Station, and the surface-level car-park to the north of the Station), there is clearly no scope whatever for the redevelopment of the existing Station complex - or for decking-over the tracks and the present day-lit, open-air platforms.</p> <p>However, this is not to suggest that there is no scope to enhance the existing Station complex - principally by carefully reinstating and restoring its original and very distinctive architectural interest and integrity, which has long remained a desirable objective, involving the removal of a series of damaging alterations carried out over recent years. Importantly, too, any proposed decking-over of the existing platforms and tracks and the resulting loss of daylighting and natural ventilation for the travelling public would not only have a massive and damaging impact on the amenity presently enjoyed by the public using the Station, but would also be wholly inconsistent with current national, London-wide and local sustainability interests. Most importantly, any significant increase in retail, leisure and/or entertainment uses on the site is most likely to harm damage the viability and vitality of the existing and long-established retail, leisure and entertainment in the heart of the Town to the south by drawing people away from The Quadrant, George Street, Sheen Road, The Square, Duke Street, King Street, Red Lion Street, Hill Street and Bridge Street. Similarly, any significant increase in retail, leisure and/or entertainment uses on the site is likely to necessitate a significant level of vehicular servicing that could only be provided via The Quadrant or Kew Road.</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the suggested suitability of the Station site and its immediate setting as 'a tall building zone (7-8 storeys)... with the opportunity for a landmark building' is wholly unacceptable, unrealistic and needs to be omitted altogether.</p> <p>Importantly, there is a clear need to fundamentally review and revise the current Development Brief for the Station site which dates back to March, 2002.</p>
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-	Peter Willan and Paul Velluet, Old Deer Park Working Group		[See comment 1035 in respect of Policy 45 and high rise development which refer to Richmond Station]	See response to comment 594 with regards the appropriateness of a tall building zone.

597	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 25. Former House of Fraser, 16, Paved Court, 20, King Street, 4 to 8 and 10, Paved Court and 75-81, George Street, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any development of the site to provide for the enhancement of the external elevations of the existing 1960s building and the complete removal of the existing plant-enclosures at roof level in order to enhance views of the building from The Green and Hill Street, particularly in relation to the setting of the grade II* listed properties in Old Palace Terrace on Richmond Green, and that any extension or extensions to the existing building should rise no higher than the existing building (i.e. above four storeys), or that any replacement development of the site should rise no higher than that of the existing building .</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F1 Central Richmond and Richmond Green Conservation Area Statements</p>	<p>The former House of Fraser building itself is not a heritage asset, though the Site Allocation makes clear that any development proposal must be of the highest quality in character, respond positively to the Conservation Areas and protect and where possible enhance on-site Listed Buildings and BTMs, as well as nearby heritage assets. Thus any future planning application would to have regard to heights, elevational design and roof treatments as part of the demonstration of compliance with the above. To list these specific requirements is considered to be too prescriptive for the purposes of a Site Allocation, whose existing wording would already allow for assessment of these matters. Thus no changes to the wording are recommended.</p>
600	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 26 - Richmond Telephone Exchange, Spring Terrace, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing building should rise no higher than the three-storey part of the existing building, or that any replacement development of the site should rise no higher than that of the three-storey part of the existing building.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F1 Sheen Road Conservation Area Statement</p>	<p>See response to comment 599 with regards to heights.</p>
603	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 27. The American University, Queen's Road, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing buildings on the site should rise no higher than any of the existing buildings on the site, or that any replacement or additional buildings on the site should rise no higher than any of the existing buildings on the site.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F2 Richmond Hill Conservation Area Statement</p>	<p>The Site Allocation makes clear that any development proposal must protect and where possible enhance the heritage assets on site and the Conservation, as well as nearby heritage assets, having regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance set out in the Urban Design Study and Village Planning Guidance. 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. The wording of the Site Allocation is therefore considered to be appropriate and no amendments are recommended.</p>



609	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 28 - Homebase, Manor Road, North Sheen	<p>(N.b. Not East Sheen)</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text of this Site Allocation needs to be amended by the deletion of the statement: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones', and the statement '...however the Urban Design Study 2021 recommends the appropriate heights for the zone are up to 8 storeys to respect the small scale of the surrounding area'. The draft text needs to be further amended to include specific reference to the need for any new development across the site to rise no higher than four storeys in order to relate the predominantly two-storey scale of the nearby residential areas to the north, north-west, west, south-west, south and east of the site, and to the similarly scaled properties within the nearby Sheendale Road and Sheen Road Conservation Areas'.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F3</p>	<p>See response to comment 594 regarding the methodology underpinning the Urban Design Study.</p> <p>Part of the site is identified within the UDS as having capacity for buildings of 7-8 storeys, illustrated on the heat maps on p.256 and p.328. The heat maps show the tallest buildings located in the centre of the site and reducing in height, reflected in the mid-rise zone which provides a transition to the smaller scale of the surrounding area.</p> <p>Additional wording to make specific reference within Appendix A to 2-storey prevailing heights to the N, NW, W, SW and SE and more specific separate references to the Homebase site versus the Sainsburys site has been amended in the updated Urban Design Study. However, no changes to the Site Allocation itself are recommended.</p>
616	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 29 - Sainsbury's, Lower Richmond Road and Manor Road, North Sheen	<p>Site Allocation 29 - Sainsbury's, Lower Richmond Road and Manor Road, North Sheen</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text needs to be amended by the deletion of the sentence: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones'.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Charcater Area F3</p>	<p>See response to comment 594 regarding the methodology underpinning the Urban Design Study. The site is assessed as having capacity for buildings up to 7-8 storeys in part of the site, stepping down around the edges of the site to a mid-rise zone with maximum 5-6 storeys. No amendments to the Site Allocation are required.</p>

618	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Kew	<p>Based on Section 3 – Character Areas in Arup’s 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area ‘G1 – Kew Gardens and Riverside’ under the overall heading ‘G –Kew’). Like Richmond Park, the Old Deer Park should be covered by its own Character Area as ‘F4 – The Old Deer Park’, under the overall heading of ‘F – Richmond &amp; Richmond Hill (sic)’. On this basis, other sections of Arup’s Urban Design Study and to the Draft Local Plan need to be adjusted accordingly.</p> <p>Indeed, more fundamentally, the proposed structure of ‘Character Areas’ relating to Richmond, Kew and North Sheen as set out in Section 3 et seq. in Arup’s Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. They should surely be based for the most part on the present conservation areas.</p>	<p>The Old Deer Park is grouped into the character area G1 ‘Kew Gardens and Riverside’ because it is similar in character to the open spaces along this stretch of the Thames with regards to its green space, openness and its location next to the river. It is also part of the Kew Registered Park and Garden.</p> <p>The character areas and boundaries for the Urban Design Study (UDS) 2021 were subject to public consultation in May to June 2021. The method for defining the boundaries is set out in the methodology of the UDS pp.351- 353. This explains that, alongside field work, the following sources of information was used to define the boundaries included:</p> <ul style="list-style-type: none"> <li>-the Village Planning Guidance SPDs</li> <li>-Ward boundaries</li> <li>-existing town centres and areas of regeneration</li> <li>-conservation areas.</li> </ul> <p>Wherever possible, the UDS has followed conservation area boundaries and in particular, aimed not to split conservation areas. In some cases, conservation areas have been grouped because they are at too fine a grain for the scope of the study. The existing boundaries of the Village Planning Guidance were also used wherever possible, though areas were combined to achieve a more usable scale for the scope and purposes of this borough-wide study.</p> <p>The Old Deer Park is written about separately in the character area profile on p.170 and it is not considered that it warrants a separate character area profile.</p> <p>With regards to the other boundaries within the Richmond, North Sheen and Kew place, a detailed description of how these have been defined is provided below.</p> <p>Richmond Town Centre and Riverside: The boundary aims to incorporate the town centre character and uses and the Richmond part of the Riverside. Southern edge follows Village Planning SPD Area 13 along the river to Twickenham Bridge where it then follows the bridge as a logical feature and perceptual ‘end’ of Richmond town, before following the Village Planning SPD Area 13 and 14 and Conservation Area boundary with Old Deer Park. To the north west it follows Village Planning</p>
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619	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Kew (in relation to Old Deer Park)	We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Old Deer Park Working Group on the Old Deer Park to be considered alongside this response from the Prospect of Richmond on Richmond Town.	See response to Comment 618 regarding the character area boundaries and Old Deer Park.  Comments noted.
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620

Peter Willan and Paul Velluet, Old Deer Park Working Group

Place-based Strategy for Kew (in relation to Old Deer Park)

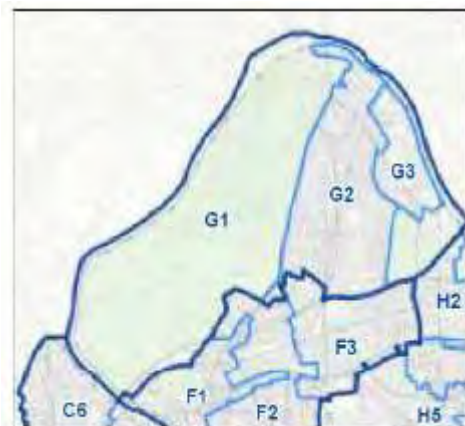
Place Definitions. Based on Section 3 – Character Areas in Arup’s 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area ‘G1 – Kew Gardens and Riverside’ under the overall heading ‘G –Kew’. Like Richmond Park, the Old Deer Park should be covered by its own Character Area as ‘F4 – The Old Deer Park’, under the overall heading of ‘F – Richmond & Richmond Hill (sic)’. On this basis, other sections of Arup’s Urban Design Study and to the Draft Local Plan need to be adjusted accordingly.

Indeed, more fundamentally, the proposed structure of ‘Character Areas’ as set out in Section 3 et seq. in Arup’s Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. They should surely be based for the most part on the present conservation areas and in this case the Old Deer Park Conservation Area.

Confusingly, the extant ‘Richmond & Richmond Hill Village Plan’ (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD.

We have extracted the Character Area Map from Arup’s Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.

See response to Comment 618 regarding the character area boundaries.



Kew Character Areas (G1-G3, F1-F3, H1-H5, C6) Urban Design Study Dec 2021

- Conservation Area 1: Royal Park
- Conservation Area 2: The People's Temple
- Conservation Area 3: North of Lower Hill Road
- Conservation Area 4: South of Lower Hill Road
- Conservation Area 5: Richmond Hill
- Conservation Area 6: Old Deer Park
- Conservation Area 7: Riverside Lower and Upper Richmond Road
- Conservation Area 8: Royal Botanic Gardens
- Conservation Area 9: Queen's Road Estate
- Conservation Area 10: Queen's Road (east side)
- Conservation Area 11: Richmond Hill
- Conservation Area 12: Richmond Hill
- Conservation Area 13: Richmond Hill
- Conservation Area 14: Richmond Hill
- Conservation Area 15: Richmond Hill
- Conservation Area 16: Richmond Hill
- Conservation Area 17: Richmond Hill
- Conservation Area 18: Old Deer Park



Conservation Areas Richmond & Richmond Hill Village Plan



634	Peter Willan and Paul Velluet, Old Deer Park Working Group	Site Allocation 32: Pools on the Park and surroundings, Old Deer Park, Richmond	<p>The fourth bullet-point in the draft text needs to be amended to refer to the fact that at present the Statement of Significance is only in an incomplete draft form and needs to be amended before formal adoption in order to take full account of the particular special interest and significance of the listed pools complex and its landscaped setting. (In this connection, the Old Deer Park Working Group has been pressing the Council to undertake such amendment repeatedly since March, 2018. The text also needs to take account of the repeated requests by the local community over the last forty years for the Pools complex and its surrounding landscaped setting to be designated as Metropolitan Open Land, like the parkland which surrounds them).</p> <p>Supporting document/evidence:  Urban Design Study December 2021 (Character Area G1)  Old Deer Park Conservation Area Statement  Old Deer Park: The Crown Estate Landscape Strategy 1999  Old Deer Park Supplementary Planning Document 2018 Draft Statement of Significance  Old Deer Park: The Crown Estate Landscape Strategy 1999  Old Deer Park Supplementary Planning Document 2018</p>	<p>It has been clarified on the Council's website in May 2022 that the Statement of Significance: Richmond Public Baths, Old Deer Park, Richmond September 2017 a draft version. It remains appropriate that the Site Allocation refers to this document. The special interest and significance of the site and its surroundings is well recorded in other documents too, including the Old Deer Park SPD February 2018, CA57 Old Deer Park Conservation Area appraisal, and Richmond and Richmond Hill Village Planning Guidance June 217. These are all identified in the Site Allocation. The text also makes specific reference to the importance that any development proposal is considered within the context of the designations of the site and surrounding area. It is therefore considered that the current wording of the text is sufficient.</p> <p>Pools on the Park is a developed parcel of land which also includes a sizable amount of hardstanding. It is not considered that the site would score sufficiently highly against the 4 criteria used as part of the Open Land Review 2021 intended to inform the new Local Plan and consequently there are no plans by the Council to extend the surrounding MOL designation to include the site.</p>
638	Peter Willan and Paul Velluet, Old Deer Park Working Group	Site Allocation 33: Richmond Athletic Association Ground, Old Deer Park, Richmond	<p>No change proposed.</p> <p>Supporting document/evidence:  Urban Design Study December 2021 (Character Area G1)  Old Deer Park Conservation Area Statement  Old Deer Park: The Crown Estate Landscape Strategy 1999  Old Deer Park Supplementary Planning Document 2018</p>	Noted.
673	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General - Policies	Section 15 in the un-headed list of contents – titled 'Policies' - doesn't contain anything other than one photograph. Instead, the polices are set out in Sections 4 and 16 to 26 inclusive. Needs remedying.	-
674	Peter Willan and Paul Velluet, Old Deer Park Working Group	General - Policies	Section 15 in the un-headed list of contents – titled 'Policies' - doesn't contain anything other than one photograph. Instead, the polices are set out in Sections 4 and 16 to 26 inclusive. Needs remedying.	-

Off

678	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Climate Change Emergency.	We welcome the increased emphasis given to climate change and pollution.	Support noted.
679	Peter Willan and Paul Velluet, Old Deer Park Working Group	Climate Change Emergency.	We welcome the increased emphasis given to climate change and pollution.	Support noted.
794	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to culture)	We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council's Culture Richmond 2021-2031 Plan.	Noted.
795	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to culture)	We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council's Culture Richmond 2021-2031 Plan.	Noted.

805

Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)

Policy 18. Development in centres

We refer to Arup's Urban Design Study, December 2016; Lichfields Richmond-upon-Thames Retail and Leisure Needs Study Phase 1 Update, July 2021; Icen's Richmond Local Housing Market Assessment, December 2021; and Santec's Employment Land and Premises Needs Assessment, December 2021- all provided as supplementary evidence by the Council.

We have sought to pull together the estimated demand and availability of floor space for all uses in Richmond Town from 2021 to 2039.

**Richmond Zone 1 Retail, Non-retail services and Leisure Floor space**

Lichfields' Report estimates population as shown in Figure 1 and retail, non-retail services and leisure over/under supply in Figure 2. Richmond borough is divided by Lichfields into 7 zones: Richmond, Twickenham, Whitton, Teddington, Hampton, Kew/North Richmond, Barnes/E Sheen. The focus here is on Zone 1 for which a map is shown in Figure 3. The population for the borough is estimated to rise by only 2.9% from 2021 to 2039 and to decline slightly in Richmond Zone 1. The over/under supply of space is calculated by estimating the expenditure per person and then the total available expenditure based on the population. Expenditure from existing facilities is estimated and subtracted from the available expenditure to establish the incremental expenditure from new facilities. This increment is then converted into net floor space by turnover density factors and finally into gross floor space over/under supply. We question why Table 11 page 74 of the Lichfields' Report is headed Gross floor space - a step of first calculating Net floor space seems to be missing.

It is estimated that in 2039 there will be an under supply of retail and non-retail services floor pace of 1,457 m2 and an over supply in preceding years. There is an estimated under supply of 7,000 m2 for leisure in 2039 and 4,000 m2 in 2034 but no information for earlier years. Non-retail services include hairdressers, banks, restaurants, cafes and hot food takeaways. Leisure includes cinemas and cultural activities. Home/internet turnover is taken into account.

Table 1	Population				
	2021	2024	2029	2034	2039
Population Richmond Zone 1 see map attached	23,031	22,440	22,056	22,170	22,536
Population Richmond Borough	199,603	198,220	200,146	201,548	205,200

Figure 1 Source Lichfields report on Retail and Leisure

Table 3.1a	Over(-)/under(+) Supply Cumulative Gross Floorspace					
	Total 2017	2021	2024	2029	2034	2039
	m2	m2	m2	m2	m2	m2
Retail Convenience	7,950		-246	-163	55	388
Retail Comparison	31,727		-1,584	-2,075	-1,895	-1,342
Food/beverage	4,640		-3,266	-217	891	2,411
Non-retail Services						
<b>Total</b>	<b>44,317</b>		<b>-5,106</b>	<b>-2,455</b>	<b>-949</b>	<b>1,457</b>
Leisure					4,000	7,000

Figure 2 Source Lichfields report on Retail and Leisure

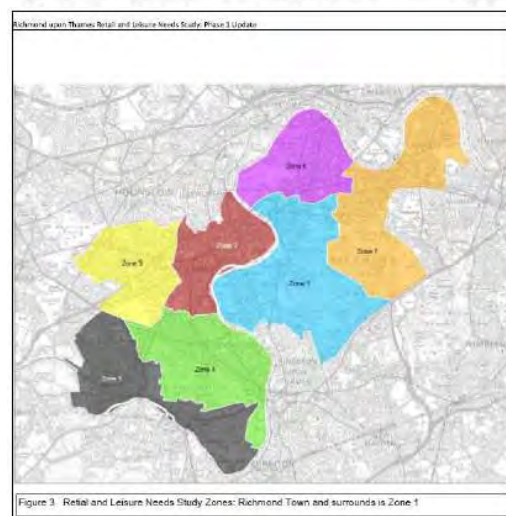


Figure 3 Retail and Leisure Needs Study Zones: Richmond Town and surrounds is Zone 1

				<p>The Evidence Base seeks to forecast the need for land uses to ensure that needs are met as required by the NPPF. The research has been produced separately, reflecting industry-standard approaches, but in a co-ordinated way, with liaison between consultants.</p> <p>The Council's Town Centre Land Use Survey records ground floor occupiers of premises in the borough's centres, covering approximately 2,500 premises. Despite the pandemic, data have continued to be collected and analysed with surveys taking place in 2019, 2020, 2021 and 2022.</p> <p>The RLNS has been purposefully split into two phases to allow for the more detailed assessment, including the qualitative element, to be produced in 2022 when it was expected that the impact of the pandemic would have lessened from the previous year, in order to produce as accurate an assessment as possible, bearing in mind timetabling commitments for the Local Plan.</p> <p>This approach, coupled with the updating of key elements of the evidence base including the Employment Land and Premises Needs Assessment and the Urban Design Study provide an up-to-date basis which supports the Regulation 19 Local Plan.</p>
807	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment in relation to planning uses	We welcome the recognition of the implications, including the risks, of the new combined business land Use Class E and changes to permitted development rights. We comment later on this topic and the potential consequences for balancing the uses of Richmond Town and its character.	Noted.



<p>812</p>	<p>Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)</p>	<p>General comment in relation to Evening and Night Time Economy.</p>	<p>We note support throughout the Local Plan to Richmond town centre Night Time economy and in some cases extending to the Riverside and Richmond Green. We welcome the caveat in the Local Plan as stated in Policy 19, Managing Impacts and elsewhere, that there is a combined and cumulative impact that needs to be controlled and that amenity of residents needs to be protected. It may be semantics but we recommend a greater distinction between the evening and night time economies with the later applying to the late evening early hours of the morning. We are opposed to supporting a Night time economy in Richmond Town and on and around Richmond Green due to resident harm and the Riverside due to resident harm including those on the Twickenham riverside.</p> <p>Richmond town and surrounding areas have one of the highest ratios of pubs and bars to residents in the whole of London and moreover confined to a small area by the Thames and railway line. Public transport is reduced by midnight and is very limited shortly thereafter. Police and cleansing resources are not available at night time. We support the evening economy, and increasing family use, but the town needs to wind down before midnight so residents can get their eight hours sleep as advised by the WHO, difficult as this is with Heathrow night flights starting at 4:30am.</p> <p>We note Policy 19 does enable the Council to limit closing hours of premises. But we urge the Local Plan to go further. Night time economy infers activity past 11pm into the early hours of the morning and we would urge the Local Plan to explicitly discourage this in Richmond Town, but of course recognising there may be exceptions. Disturbance of residents arises to those living in the heart of the town as well as on and around Richmond Green and along the Riverside which also includes resident disturbance on the Twickenham riverside. We urge better distinction between the evening and night economies.</p>	<p>Richmond town centre is recognised in the London Plan as having a classification NT 2 – an area of regional/sub-regional importance in terms of the night-time economy.</p> <p>It is considered that the policies proposed, particularly Policy 19, are sufficiently robust to ensure that impact on residential amenity is taken fully into account. The preferred approach is to consider each proposal on its merits and include consideration of cumulative impact and whether the proposal would result in the over-concentration of similar uses contrary to policies 18 &amp; 19.</p> <p>The Council’s Licensing policy may also be taken into account, including the Cumulative Impact Policy applying to large parts of the centre. Hours of operation can be restricted where reasonable and appropriate under both licensing and planning regimes.</p>
<p>865</p>	<p>Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)</p>	<p>Policy 28. Local character and design quality (Strategic Policy)</p>	<p>The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework .</p> <p>The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.</p>	<p>The purpose of Policy 28 is to encompass all development within the Borough, with special attention paid to the 'places' and 'character areas' identified in the Urban Design Study. Conservation Areas are included in this umbrella policy/by default but have more specific expectations outside of the scope of this policy, which are outlined in Policy 29 – Designated Heritage Assets.</p> <p>The purpose of the Urban Design Study is outlined in detail in Policy 2 (Spatial Strategy: Managing change in the borough) and in sections 5 and 6 of the Local Plan.</p> <p>See also response to comment 586.</p>

Off

866	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 28. Local character and design quality (Strategic Policy)	The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework . The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.	See response to comment 865.
878	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 29. Designated heritage assets	No change proposed.	Comment noted.
879	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 29. Designated heritage assets	No change proposed.	Comment noted.
885	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 30. Non-designated heritage assets	No change proposed.	Comment noted.
886	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 30. Non-designated heritage assets	No change proposed.	Comment noted.
927	Peter Willan and Paul Velluet, Old Deer Park Working Group	MOL Review – naming of Parcel 28 and Parcel 31	The Arup MOL Review Annex Report; a Parcel 28 page 92 is titled Little Green. It should be Richmond Green, b Parcel 31 page 101 is titled Thames Old Deer Park. It is not part of the Old Deer Park.	The Open Land Review has been updated in 2023 to incorporate these suggestions for the site assessments.

929	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 35 – Green Belt, Metropolitan Open Land and Local Green Space	<p>We respond here on MOL status for Richmond Green, Policy 35, which is significantly undervalued by Arup's MOL Review Annex Report, and on Riverside North of Richmond Bridge and Riverside South of Richmond Bridge.</p> <p>Under the heading 'Proposed changes to the Policies Map' the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.</p> <p>(In Arup's 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 'Parcel' (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens 'Parcel' – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside 'Parcel' – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that 'the eastern third of the parcel, is developed and does not meet the MOL criteria' and that its MOL status should be considered further. The parcel is certainly NOT 'largely inaccessible to people' as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.</p> <p>In relation to the The Green and Little Green, Richmond 'Parcel' – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of The Buildings of England – London 2: South as 'one of the most beautiful urban greens surviving anywhere in England', Richmond Green possesses not only considerable architectural, historic and landscape interest and significance, but importantly, constitutes a</p>	<p>The Council, through the Arup Open Land Review (2021) only assessed existing MOL based on mapping from 2015. It is not the Council's intention to identify new parcels of land for MOL for the new Local Plan.</p> <p>Arup, in their Open Land Review 2021, separated parcel 26 from parcel 24 using accepted methodology for undertaking MOL reviews in line with national Green Belt policy, which states boundaries are to be defined 'using physical features that are readily recognisable and likely to be permanent' (paragraph 143, NPPF), in this case the A316. This eastern part of the parcel is still designated as a Registered Park and Garden, however due to a lack of 'openness' it is considered that it cannot be recommended to meet MOL purposes on this feature alone. The Council do not propose to change the MOL designation of this site in line with the Reg 18 plan.</p> <p>For criterion 4, the assessment considers whether the parcel forms part of a strategic corridor, node or link in the network of green infrastructure. A large amount of the parcel is unfenced lawn, which could be used by people, but as it has no formal access routes (apart from a small section of the Thames Path), it was considered to provide limited access links for people. Whilst the eastern third of the parcel is publicly accessible, due to its developed nature (a public car park), it was not considered to contribute to the green infrastructure network. The parcels contribution to the River Thames path was considered, scoring moderate (3) overall, despite most of the parcel scoring more weakly.</p>
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930	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	<p>We respond here on MOL status and boundary anomalies and seek to remove any question of an important part of the Old Deer Park ceasing to being designated as MOL, as raised in Arup's MOL Review Annex Report. We comment further on Policy 35 Green Belt, Metropolitan Open Land and Local Green Space.</p> <p>Under the heading 'Proposed changes to the Policies Map' the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.</p> <p>(In Arup's 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 'Parcel' (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens 'Parcel' – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside 'Parcel' – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that 'the eastern third of the parcel, is developed and does not meet the MOL criteria' and that its MOL status should be considered further. The parcel is certainly NOT 'largely inaccessible to people' as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.</p> <p>In relation to the The Green and Little Green, Richmond 'Parcel' – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of The Buildings of England – London 2: South as 'one of</p>	<ul style="list-style-type: none"> <li>• The Council, through the Arup Open Land Review (2021) only assessed existing MOL based on mapping from 2015. It is not the Council's intention to identify new parcels of land for MOL for the new Local Plan.</li> <li>• Arup, in their Open Land Review 2021, separated parcel 26 from parcel 24 using accepted methodology for undertaking MOL reviews in line with national Green Belt policy, which states boundaries are to be defined 'using physical features that are readily recognisable and likely to be permanent' (paragraph 143, NPPF), in this case the A316. This eastern part of the parcel is still designated as a Registered Park and Garden, however due to a lack of 'openness' it is considered that it cannot be recommended to meet MOL purposes on this feature alone. The Council do not propose to change the MOL designation of this site in line with the Reg 18 plan.</li> <li>• For criterion 4, the assessment considers whether the parcel forms part of a strategic corridor, node or link in the network of green infrastructure. A large amount of the parcel is unfenced lawn, which could be used by people, but as it has no formal access routes (apart from a small section of the Thames Path), it was considered to provide limited access links for people. Whilst the eastern third of the parcel is publicly accessible, due to its developed nature (a public car park), it was not considered to contribute to the green infrastructure network. The parcel's contribution to the River Thames path was considered, scoring moderate (3) overall, despite most of the parcel scoring more weakly.</li> <li>• The Council have amended criterion 4 to reflect the points set out above.</li> </ul>
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Off

952	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 37. Public open space, play, sport and recreation	No change proposed.	Noted.
954	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to culture)	We understand the Council expect to undertake a further Sports Review in 2022.	The Council has developed an update to the Richmond Playing Pitch Strategy.
955	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 37. Public open space, play, sport and recreation	No change proposed.	Noted.
1013	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 43. Floodlighting and other external artificial lighting	No change proposed.	Noted.
1014	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 43. Floodlighting and other external artificial lighting	No change proposed.	Noted.
1018	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 44. Design Process	The wording of Part B of the Policy needs to be amended to omit reference to 'the design guidance for the relevant character area as specified within the Urban Design Study 2021' insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in 'F. Richmond and Richmond Hill' (on page 255).	All development would be expected to have regard to the relevant character area set out in the Urban Design Study 2021, including proposals in Tall and Mid-Rise Building Zones and those within the Richmond and Richmond Hill character area. It is not considered that any changes to the wording are therefore considered to be necessary.
1019	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 44. Design Process	The wording of Part B of the Policy needs to be amended to omit reference to 'the design guidance for the relevant character area as specified within the Urban Design Study 2021' insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in 'F. Richmond and Richmond Hill' (on page 255).	See response to Comment no. 1018.

1032	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 45.Tall and Mid-Rise Building Zones	<p>The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a 'Tall' or 'Mid-rise' buildings Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of 'Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading 'F. Richmond and Richmond Hill' relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). * In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.</p> <p>Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that 'Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land' has no relevance at all to the existing urban character of Richmond, its sustainable development, its enhancement or the provision of 'affordable housing' for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.</p>	<p>See response to comment 1030 with regards the methodology underpinning the Urban Design Study, which is considered to be robust and sound.</p> <p><u>Richmond Station</u></p> <ul style="list-style-type: none"> <li>-The Urban Design Study 2021 has identified the site as having capacity to accommodate buildings of up to 7-8 storeys. The text on p.255 highlights that the opportunities for the tallest heights are within parts of the zone, and that buildings should step down to the surroundings, as indicated by the heat map and surrounding mid-rise zone.</li> <li>-The character profile on p.158 notes that there is an underwhelming sense of arrival at the station.</li> <li>-The design guidance on p.297 states that main roads may be able to accommodate taller buildings if stepped back. It also recommends the sense of arrival and quality of the public realm at the station could be enhanced.</li> <li>-The strategy for the area is to conserve and enhance the identity of specific areas (notably around the station) and the functioning of the area as a town centre.</li> <li>-The assessment in Appendix A on p.325 provides a rationale for the appropriate heights identified. A scenario was tested on the site, which was developed in the context of providing active ground floor uses, respecting the height of the existing locally listed station building, setting the taller element back behind the primary frontage and noting there is potential for a new development to serve as a landmark gateway marking the arrival point in Richmond.</li> </ul> <p>The existing commercial building to the south of the station is 5 storeys (and 6 storeys to the east where the ground level drops).</p> <ul style="list-style-type: none"> <li>-A ZTV was produced to test the potential visibility of the scenario heights and a high level townscape, visual and heritage assessment was undertaken. The assessment concludes that there <i>'is potential for some additional height, but only where this is substantially set back within the plot and away from the road frontage'</i>.</li> <li>-The assessment notes the tall building zone is limited by the many sensitivities including the locally listed station</li> </ul>
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1033	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to high rise development)	We are deeply concerned at the support given for high rise development at the Richmond Station and comment on <b>Site Allocation 24 Richmond Station, 28 Homebase and 29 sainsbury's and Policy 45 Tall and mid-rise Building zones.</b> [See comments 596, 609, 616 and 1032]	See responses to comments 50594, 96, 609, 616 and 1032. No further amendments are required.
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1034	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to high rise development)	We are concerned at the support given for high rise development at the Richmond Station and elsewhere given the potential for interrupting views and vistas that are so important to the Old Deer Park. We comment on Site Allocation 24 Richmond Station and Policy 45 Tall and mid-rise Building zones. [See comment 1035]	See response to comment 1032 with regards to Richmond Station. Figure 424 on p. 327 of the Urban Design Study 2021 provides an illustrative view from Vu.City illustrating the potential visibility from within Old Deer Park. Whilst the upper parts of an 8 storey building would be visible in a bare earth view, in reality it would be largely screened by trees and vegetation around the park. No amendments to the text are required.
1035	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 45.Tall and Mid-Rise Building Zones	<p>The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a ‘Tall’ or ‘Mid-rise’ buildings Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of ‘Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading ‘F. Richmond and Richmond Hill’ relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). * In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.</p> <p>Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that ‘Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land’ has no relevance at all to the existing urban character of Richmond, its sustainable development, its enhancement or the provision of ‘affordable housing’ for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.</p>	Please see responses to comments 1030 and 1032 regarding the Urban Design Study methodology, Richmond Station, North Sheen and tall buildings’ impact on townscape. No amendments to the text are necessary.
-	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	High rise development	[See comment 1033 in respect of high rise development and comment 1032 in respect of Policy 45]	See response to comment 1032 with regards to Richmond Station. No amendments are required.



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-	Peter Willan and Paul Velluet, Old Deer Park Working Group	High rise development	[See comment 1035 in respect of Policy 45 and high rise development which refer to Richmond Station]	Please see responses to comments 1030 and 1032 regarding the Urban Design Study methodology, Richmond Station, North Sheen and tall buildings' impact on townscape. No amendments to the text are necessary.
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## **Draft Local Plan Pre-Publication Consultation**

**From 10 December 2021 to 31 January 2022**

### **RESPONSE FORM**

The Council is inviting comments on the first draft of the Local Plan.

The draft Local Plan sets out a 15-year strategic vision, objectives, place-based strategies and the overall spatial strategy for the borough as well as the planning policies that will guide future development in the borough. It looks ahead to 2039 and identifies where the main developments will take place, and how places within the borough will change, or be protected from change, over that period. In addition, the draft Local Plan sets out the site allocations that are considered to assist with the delivery of the vision and strategy of the Plan. This is of particular importance for ensuring there is sufficient land for employment, retail, housing and social infrastructure.

We would like to hear the views from our local communities, businesses and other key organisations on the draft Plan.

#### **How to respond**

Please read the consultation documents and other background information made available on the Local Plan website. To view the draft Local Plan and take part in the consultation, visit [https://www.richmond.gov.uk/draft\\_local\\_plan\\_pre\\_publication\\_version](https://www.richmond.gov.uk/draft_local_plan_pre_publication_version)

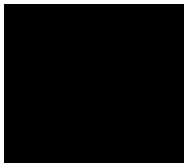



#### **You can respond on the consultation documents in the following ways:**

- Online response form through our **consultation portal** <https://richmond-consult.objective.co.uk/kse>
- Email to **LocalPlan@richmond.gov.uk** this response form (a PDF and Word version of the form can be found on the Council's website at [https://www.richmond.gov.uk/draft\\_local\\_plan\\_pre\\_publication\\_version](https://www.richmond.gov.uk/draft_local_plan_pre_publication_version)). In the form in 'Word' format you can type in your response and return it as an email attachment
- Post a hard copy of the form to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ.

All responses must be received by Monday **31 January 2022**.

#### **This form has three parts:**

- Part A – Personal details and about you
- Part B – Your general views
- Part B – Your detailed response

Part A: Personal Details		
	1. Personal Details *	2. Agent's Details (if applicable)
Title	Messrs	
First name		
Last name	Willan, Velluet and Bain	
Job title (where relevant)		
Organisation (where relevant)	Prospect of Richmond	
Address		
Postcode		
Telephone		
E-mail address		

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

### Part A: About You...

Prospect of Richmond is a group of local residents that have extensive knowledge and experience of living in or near Richmond Town and the surrounding area. Two of us have been past chairs of the Richmond Society and one a past chair of the Friends of Richmond Green and one of us chairs the Richmond Heathrow Campaign comprising the Richmond Society, Kew Society and the Friends of Richmond Green. While not part of this response we have extensive involvement with the adjacent Old Deer Park. Two are architects.

Individually and together, we have been involved with many planning, licensing, traffic, heritage, charity, cultural and other matters. We are dedicated to the preserving and improving the area for the benefit of residents and other stakeholders. Over many years we have engaged extensively with Richmond-upon-Thames Council and are keen to continue doing so.

<b>3. Please tell us about yourself or who you are responding on behalf of...( tick all which apply)</b>		
Do you live in the borough?	Yes X	No G
Do you work in the borough?	Yes G	No G
Do you run a business in the borough?	Yes G	No G
Are you a student in the borough?	Yes G	No G
Are you a visitor to the borough?	Yes G	No G

### Data protection

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

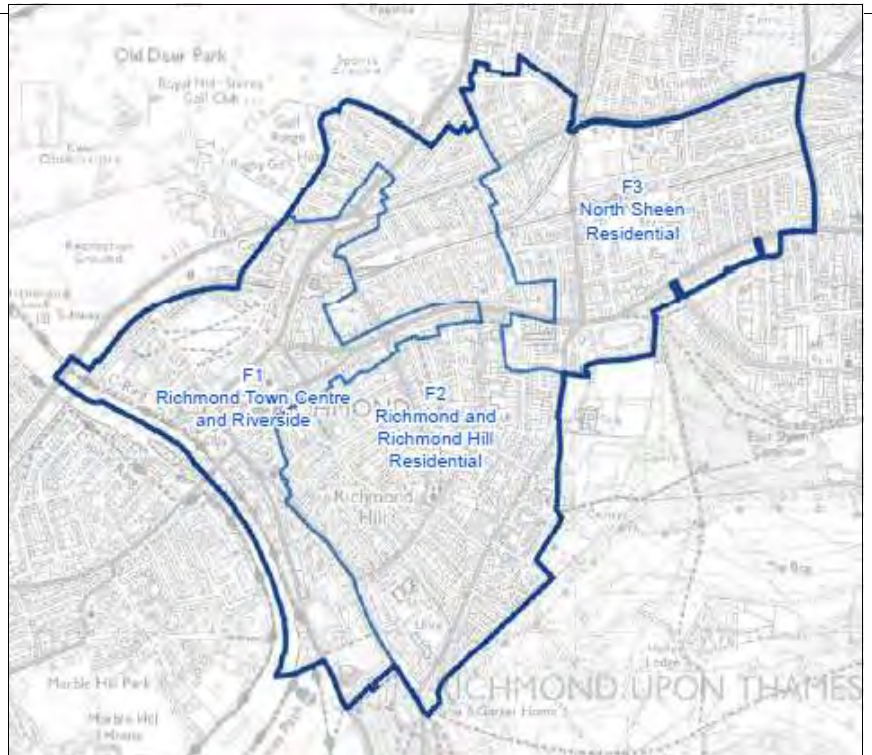
The Council's Privacy Notice is published on the webpage [www.richmond.gov.uk/data\\_protection](http://www.richmond.gov.uk/data_protection)

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

### Part B: Your General Views

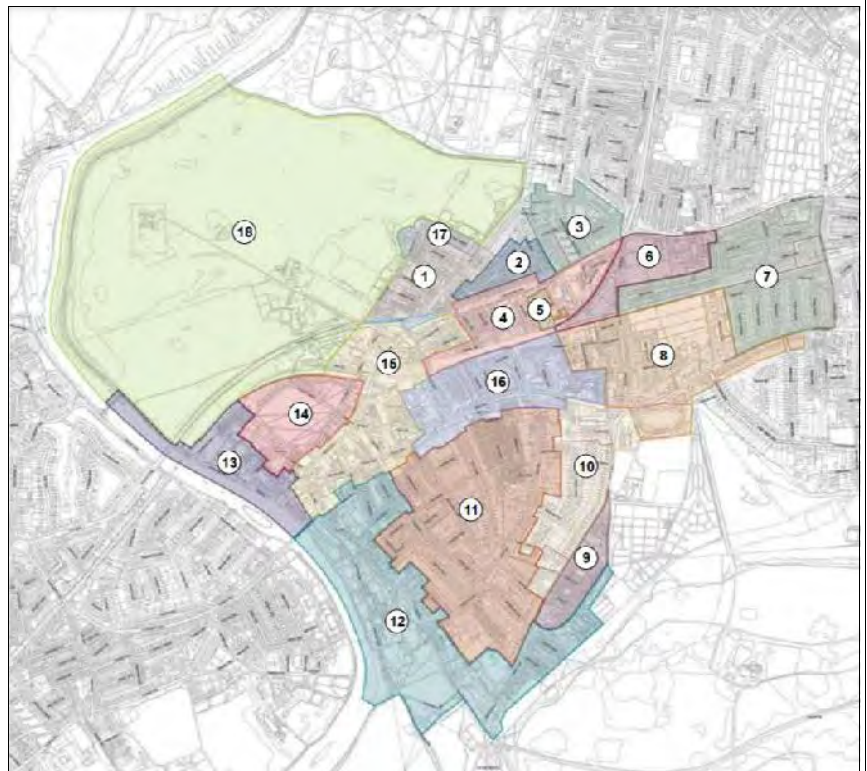
- Place Definitions.** We refer to Richmond Town as comprising the Conservation Areas for Richmond Town Centre, Richmond Green, Richmond Riverside and Richmond Hill. The use, character and value of the four components of Richmond are very different but it is this diversity, side by side in a relatively small area, that is so valuable. The whole is greater than the sum of the parts.
- Local Plan Section 11 heading is 'Place-based Strategy for Richmond & Richmond Hill'. The study area is defined as 'Richmond Town Centre and Riverside, and the residential and mixed use areas into Richmond Hill and North Sheen'. These are character areas F1, F2 and F3 in the Urban Design Study 2021'. 'Richmond Town Centre and Riverside' (F1) is described as including Richmond Green. We believe the four components of Richmond Town should be separately identified in line with the boundaries of the Conservation Areas for Central Richmond, Richmond Green, Richmond Riverside and Richmond Hill and that the character areas should match the Conservation Area boundaries.
- Confusingly, the extant 'Richmond & Richmond Hill Village Plan' (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD. We note parts of the two Riverside Conservation Areas are on the Twickenham side of the river Thames whereas the Local Plan boundary appears to be the centre of the river.
- We have extracted the Character Area Map from Arup's Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.





Richmond & Richmond Hill. Urban design Study Dec 2021

- Conservation Area 1: Kew Foot Road
- Character Area 2: The Pagoda Triangle
- Character Area 3: North of Lower Mortlake Road
- Character Area 4: South of Lower Mortlake Road
- Conservation Area 5: Sheendale Road
- Character Area 6: Old Gas Works
- Character Area 7: Between Lower and Upper Richmond Road
- Character Area 8: Kings Farm Avenue and surrounds
- Character Area 9: Queen's Road Estate
- Character Area 10: Queen's Road (west side)
- Conservation Area 11: St Matthias
- Conservation Area 12: Richmond Hill
- Conservation Area 13: Richmond Riverside
- Conservation Area 14: Richmond Green
- Conservation Area 15: Central Richmond
- Conservation Area 16: Sheen Road
- Character Area 17: Old Deer Park Gardens
- Conservation Area 18: Old Deer Park



Conservation Areas Richmond & Richmond Hill Village Plan

5. Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. **Needs remedying.**
6. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. **Needs remedying.**
7. Section 15 in the un-headed list of contents – titled ‘Policies’ - doesn’t contain anything other than one photograph. Instead, the policies are set out in Sections 4 and 16 to 26 inclusive. **Needs remedying.**
8. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. **Needs remedying.**
9. In the un-headed list of contents Section 3 is titled ‘Place-based Strategy for Richmond & Richmond Hill’ whereas it should be titled as ‘Richmond Town Centre and Riverside, Richmond and Richmond Hill Residential and North Sheen Residential’ – assuming that one accepts the highly questionable concept and structure of ‘Character Areas (sic) as set out in Arup’s 432-page Urban Design Study. **Needs remedying.**
10. Neither Section 2 nor Section 15 appears to included any reference to a Policies Map. Referring to the note contained under ‘Policies Map for the Local Plan Review, 2015-2018’ in the part of the Council’s current Planning Policy web-site dealing with the current ‘Adopted Local Plan’ (adopted in July, 2018), it is clearly stated that ‘The Council’s Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020’. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. **The omission needs to be urgently remedied.**
11. Based on Section 3 – Character Areas in Arup’s 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area ‘G1 – Kew Gardens and Riverside’ under the overall heading ‘G –Kew’). Like Richmond Park, the Old Deer Park should be covered by its own Character Area as ‘F4 – The Old Deer Park’, under the overall heading of ‘F – Richmond & Richmond Hill (sic)’. On this basis, other sections of Arup’s Urban Design Study and to the Draft Local Plan **need to be adjusted accordingly.**
12. Indeed, more fundamentally, the proposed structure of ‘Character Areas’ relating to Richmond, Kew and North Sheen as set out in Section 3 et seq. in Arup’s Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. **They should surely be based for the most part on the present conservation areas.**
13. So much in the Draft Local Plan derives from questionable analysis and questionable recommendations in Arup’s Urban Design Study and, in more limited part, this in Arup’s 156-page Metropolitan Open Land Review Annexe Report. **Indeed, all these need to firmly challenged.**
14. **Sustainable Growth.** We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four

reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to **Policy 18**.

15. In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise “Improvement” as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.
16. **Climate Change Emergency.** We welcome the increased emphasis given to climate change and pollution.
17. **Planning Uses.** We welcome the recognition of the implications, including the risks, of the new combined business land Use Class E and changes to permitted development rights. We comment later on this topic and the potential consequences for balancing the uses of Richmond Town and its character.
18. **Culture.** We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council’s Culture Richmond 2021-2031 Plan.
19. **Evening and Night Time Economy.** We note support throughout the Local Plan to Richmond town centre Night Time economy and in some cases extending to the Riverside and Richmond Green. We welcome the caveat in the Local Plan as stated in **Policy 19, Managing Impacts** and elsewhere, that there is a combined and cumulative impact that needs to be controlled and that amenity of residents needs to be protected. It may be semantics but we recommend a distinction between the evening and night time economies with the later applying to the late evening early hours of the morning. We are opposed to supporting a Night time economy in Richmond Town and on and around Richmond Green due to resident harm and the Riverside due to resident harm including those on the Twickenham riverside.
20. **RBID.** We note the explicit reliance on the RBID and its Vision in the **Local Plan Section 11 Place-Based Strategy for Richmond and Richmond Hill** but we have not been able to find the Vision Report as evidence and are concerned that since the RBID is established by businesses alone and not residents there is likely to be a bias in favour of businesses. Also, the areas covered by the RBID are parts of Richmond Town Centre and not Richmond Green, for example where we wholly oppose commercial use, other than in the context of mixed use along Greenside. We are concerned that the democratic process may be at risk and while we are not saying this is intentional, we believe the matter needs to be resolved going forward. In so far as our response here is concerned, without the evidence we are not able to make a reasoned response on the RBID Vision included in the draft **Local Plan at Placed-based Strategy- Richmond and Richmond Hill**.

21. **High Rise development.** We are deeply concerned at the support given for high rise development at the Richmond Station and comment on **Site Allocation 24 Richmond Station, 28 Homebase and 29 sainsbury's and Policy 45 Tall and mid-rise Building zones.**
22. **Site Allocation.** We respond here on **Site Allocations 24, 25, 26, 27, 28 and 29** and raise a number of concerns.
23. **MOL.** We respond here on MOL status for Richmond Green, **Policy 35**, which is significantly undervalued by Arup's MOL Review Annex Report, and on Riverside North of Richmond Bridge and Riverside South of Richmond Bridge.
24. **Specific Policies.** We respond here to Policies **18, 19, 28, 29, 30, 35, 37, 43, 44 and 45.**
25. **Heathrow noise.** We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re- allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the **Introduction paragraphs 2.44 and 2.45.**
26. **Old Deer Park.** We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Old Deer Park Working Group on the Old Deer Park to be considered alongside this response from the Prospect of Richmond on Richmond Town.



<b>4. Do you agree or disagree with the Strategic Vision? (section 3)</b>				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.				
<b>5. Do you agree or disagree with the Strategic Objectives? (section 3)</b>				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.				
<b>6. Do you agree or disagree with Policy 1. Living Locally and the 20-minute neighbourhood? (section 4)</b>				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with Policy 1 and the 20-minute neighbourhood.				
<b>7. Do you agree or disagree with Policy 2. Spatial Strategy: Managing change in the borough? (section 4)</b>				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with Policy 2, Spatial Strategy: Managing Change in th borough.				
<b>8. Do you agree or disagree with the place-based strategies? (sections 6 to 14)</b>				
Strongly Agree G	Agree G	Neither Agree/Disagree G	Disagree X	Strongly Disagree
Any Comments: Our response here on the Place-based Strategy: Richmond Town and Richmond Hill and Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree.				

### 9. To which parts of the draft Local Plan does your response relate to?

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	11. Richmond & Richmond Hill (Richmond Town Centre and Riverside),
		Site Allocation(s) no./ name	24. Richmond Station, Richmond
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G	Urban Design Study December 2021 . Character Area F1 Central Richmond Conservation Area	

### 10. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

#### Response

#### **SITE ALLOCATION 24 - RICHMOND STATION, RICHMOND**

Both the title and the draft text of this Site Allocation need substantial amendment.

The title should refer specifically not only to the Station, but also to the post-War, multi-storey NCP car-park to the south of the Station, the post-War parade of single-storey shops fronting The Quadrant (at nos. 27.B to 27.G) and the post-War office-block fronting Drummond's Place to the south and south-west of the Station, to the post-War parade of shops fronting Kew Road (at nos. 2 to 8 consec.) and the offices above (Westminster House) to the north of the Station, and the surface-level car-park to the north of the Station.

A clear distinction needs to be made between proposals directly affecting the Station (together with the tracks and present day-lit, open-air platforms) and those affecting the other buildings and space referred to above. Whilst such proposals need to be coherent, they need to have regard to the substantially different considerations that apply to the present, very fine, locally listed Southern Railway Station complex (and not merely to its front façade to Kew Road and the upper booking-hall), completed in 1937, which is clearly worthy of statutory listing, together with the very fine 19th century platform-canopies serving platforms 4 and 5 and 6 and 7. Given the particular heritage significance of the Station complex - as distinct from the lack of heritage significance of the other buildings and space around the Station (the multi-storey car-park to the south of the Station, the parade of single-storey shops and the office-block fronting The Quadrant and Drummond's Place to the south and south-west of the station, the parade of shops and the offices above fronting Kew Road to the north of the Station, and the surface-level car-park to the north of the Station), there is clearly no scope whatever for the redevelopment of the existing Station complex - or for decking-over the tracks and the present day-lit, open-air platforms.

Continued/

However, this is not to suggest that there is no scope to enhance the existing Station complex - principally by carefully reinstating and restoring its original and very distinctive architectural interest and integrity, which has long remained a desirable objective, involving the removal of a series of damaging alterations carried out over recent years. Importantly, too, any proposed decking-over of the existing platforms and tracks and the resulting loss of daylighting and natural ventilation for the travelling public would not only have a massive and damaging impact on the amenity presently enjoyed by the public using the Station, but would also be wholly inconsistent with current national, London-wide and local sustainability interests.

Most importantly, any significant increase in retail, leisure and/or entertainment uses on the site is most likely to harm damage the viability and vitality of the existing and long-established retail, leisure and entertainment in the heart of the Town to the south by drawing people away from The Quadrant, George Street, Sheen Road, The Square, Duke Street, King Street, Red Lion Street, Hill Street and Bridge Street. Similarly, any significant increase in retail, leisure and/or entertainment uses on the site is likely to necessitate a significant level of vehicular servicing that could only be provided via The Quadrant or Kew Road.

Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the suggested suitability of the Station site and its immediate setting as 'a tall building zone (7-8 storeys)... with the opportunity for a landmark building' is wholly unacceptable, unrealistic and needs to be omitted altogether.

Importantly, there is a clear need to fundamentally review and revise the current Development Brief for the Station site which dates back to March, 2002.

End

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Response 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	X	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	11. Richmond & Richmond Hill (Richmond Town Centre and Riverside),
		Site Allocation(s) no./ name	25. Former House of Fraser, 16, Paved Court, 20, King Street, 4 to 8 and 10, Paved Court and 75-81, George Street, Richmond
		Maps	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Urban Design Study December 2021. Character Area F1 Central Richmond and Richmond Green Conservation Area Statements	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Site Allocation 25. Former House of Fraser, 16, Paved Court, 20, King Street, 4 to 8 and 10, Paved Court and 75-81, George Street, Richmond**

The draft text needs to be amended to include specific reference to the need for any development of the site to provide for the enhancement of the external elevations of the existing 1960s building and the complete removal of the existing plant-enclosures at roof level in order to enhance views of the building from The Green and Hill Street, particularly in relation to the setting of the grade II\* listed properties in Old Palace Terrace on Richmond Green, and that any extension or extensions to the existing building should rise no higher than the existing building (i.e. above four storeys), or that any replacement development of the site should rise no higher than that of the existing building .

End

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Response 10.



**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	X	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	11. Richmond & Richmond Hill (North Sheen Residential)
		Site Allocation(s) no./name	29. Sainsbury's, Lower Richmond Road and Manor Road, North Sheen, Richmond
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Urban Design Study December 2021. Character Area F3	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response:**

**Site Allocation 29 - Sainsbury's, Lower Richmond Road and Manor Road, North Sheen**

Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text needs to be amended by the deletion of the sentence: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones'.

End

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Response 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	X	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	11. Richmond & Richmond Hill (North Sheen Residential)
		Site Allocation(s) no./ name	28. Homebase, Manor Road, North Sheen, Richmond
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Urban Design Study December 2021. Character Area F3	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response:**

**Site Allocation 28 - Homebase, Manor Road, North Sheen (N.b. Not East Sheen)**

Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text of this Site Allocation needs to be amended by the deletion of the statement: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones', and the statement '...however the Urban Design Study 2021 recommends the appropriate heights for the zone are up to 8 storeys to respect the small scale of the surrounding area'. The draft text needs to be further amended to include specific reference to the need for any new development across the site to rise no higher than four storeys in order to relate the predominantly two-storey scale of the nearby residential areas to the north, north-west, west, south-west, south and east of the site, and to the similarly scaled properties within the nearby Sheendale Road and Sheen Road Conservation Areas'.

End

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Response 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	X	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	11. Richmond & Richmond Hill (Richmond & Richmond Hill Residentia)
		Site Allocation(s) no./ name	27. The American University, Queen's Road, Richmond
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Urban Design Study December 2021. Character Area F2	
		Richmond Hill Conservation Area Statement	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response:**

**Site Allocation 27. The American University, Queen's Road, Richmond**

The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing buildings on the site should rise no higher than any of the existing buildings on the site, or that any replacement or additional buildings on the site should rise no higher than any of the existing buildings on the site.

End

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Response 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	X	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	11. Richmond & Richmond Hill (Richmond Town Centre and Riverside)
		Site Allocation(s) no./name	26. Richmond Telephone Exchange, Spring Terrace, Richmond
		Maps	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Urban Design Study December 2021. Character Area F1  Sheen Road Conservation Area Statement	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Site Allocation 26 - Richmond Telephone Exchange, Spring Terrace, Richmond**

The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing building should rise no higher than the three-storey part of the existing building, or that any replacement development of the site should rise no higher than that of the three-storey part of the existing building.

End

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Response 10.



**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	18 Development in centres
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Policy 18. Development in centres**

We refer to Arup's Urban Design Study, December 2016; Lichfields Richmond-upon-Thames Retail and Leisure Needs Study Phase 1 Update, July 2021; Icen's Richmond Local Housing Market Assessment, December 2021; and Santec's Employment Land and Premises Needs Assessment, December 2021- all provided as supplementary evidence by the Council.

We have sought to pull together the estimated demand and availability of floor space for all uses in Richmond Town from 2021 to 2039.

**Richmond Zone 1 Retail, Non-retail services and Leisure Floor space**

Lichfields' Report estimates population as shown in Figure 1 and retail, non-retail services and leisure over/under supply in Figure 2. Richmond borough is divided by Lichfields into 7 zones: Richmond, Twickenham, Whitton, Teddington, Hampton, Kew/North Richmond, Barnes/E Sheen. The focus here is on Zone 1 for which a map is shown in Figure 3. The population for the borough is estimated to rise by only 2.9% from 2021 to 2039 and to decline slightly in Richmond Zone 1. The over/under supply of space is calculated by estimating the expenditure per person and then the total available expenditure based on the population. Expenditure from existing facilities is estimated and subtracted from the available expenditure to establish the incremental expenditure from new facilities. This increment is then converted into net floor space by turnover density factors and finally into gross floor space over/under supply. We question why Table 11 page 74 of the Lichfields' Report is headed Gross floor space - a step of first calculating Net floor space seems to be missing.

It is estimated that in 2039 there will be an under supply of retail and non-retail services floor pace of

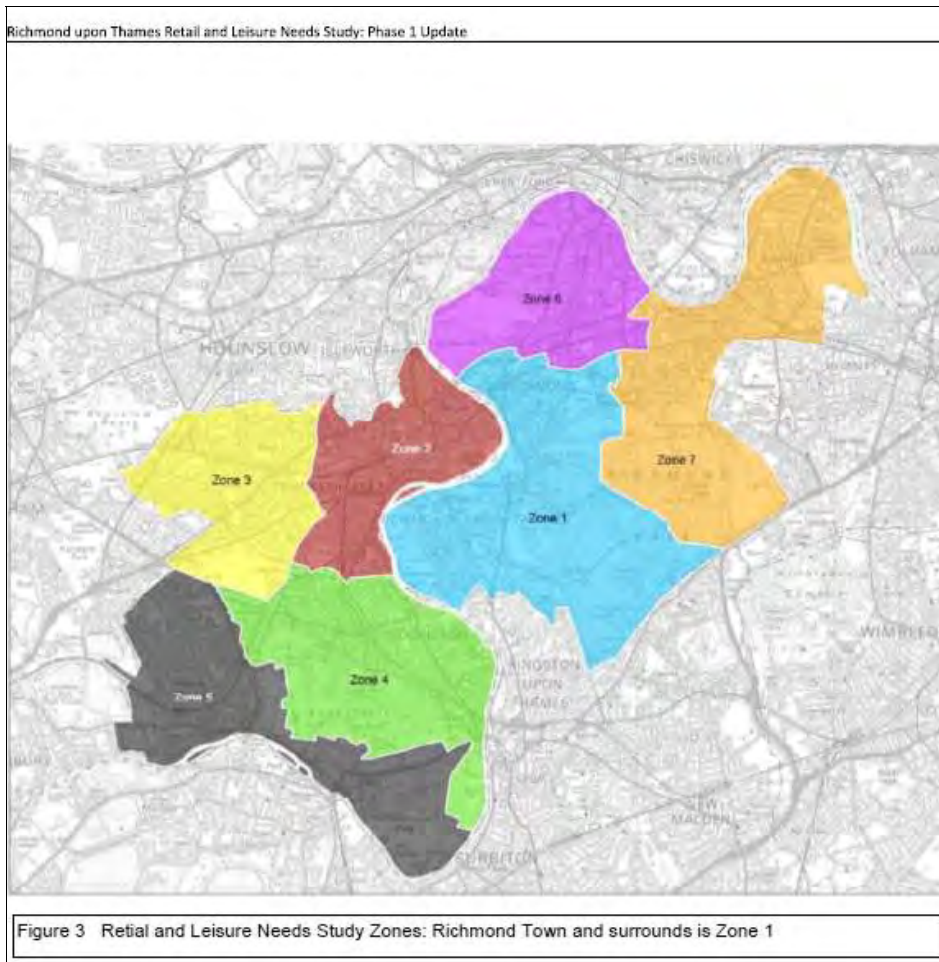
1,457 m2 and an over supply in preceding years. There is an estimated under supply of 7,000 m2 for leisure in 2039 and 4,000 m2 in 2034 but no information for earlier years. Non-retail services include hairdressers, banks, restaurants, cafes and hot food takeaways. Leisure includes cinemas and cultural activities. Home/internet turnover is taken into account.

Table 1		Population				
		2021	2024	2029	2034	2039
Population Richmond Zone 1 see map attached		23,031	22,440	22,056	22,170	22,536
Population Richmond Borough		199,603	198,220	200,146	201,548	205,200

Figure 1 Source Lichfields report on Retail and Leisure

Table 3.1a		Over(-)/under(+) Supply Cumulative Gross Floorspace				
Total 2017		2021	2024	2029	2034	2039
m2		m2	m2	m2	m2	m2
Retail Convenience	7,950		-246	-163	55	388
Retail Comparison	31,727		-1,594	-2,075	-1,895	-1,342
Food/beverage	4,640		-3,266	-217	891	2,411
Non-retail Services						
<b>Total</b>	<b>44,317</b>		<b>-5,106</b>	<b>-2,455</b>	<b>-949</b>	<b>1,457</b>
Leisure					4,000	7,000

Figure 2. Source Lichfields report on Retail and Leisure



## **Office Floor Space**

It is claimed by Santec's report that there is an under supply of office space in Richmond borough and that significant space has been lost to residential use through permitted development rights. The report examines four areas of which Richmond Town is one. The Report says 'Occupiers are attracted to Richmond due to the range of quality and size of space as well as access to amenities and rail links to south and central London' The Report estimates the 2021 demand rising from 46,366 m<sup>2</sup> in 2021 to 92,304 m<sup>2</sup> in 2039 across Richmond borough using Experian estimates. Using GLA employment estimates to derive office floor space produces a higher demand of 200,000 m<sup>2</sup> in 2039. Current stock is around 230,000 m<sup>2</sup>. Unfortunately the Santec report does not provide separate figures for Richmond Town but we might assume that since Richmond Town is the largest supplier of office space the estimated under supply also applies in part to Richmond Town.

However, there is existing vacant space in Richmond Town which includes the conversion of the Richmond Magistrates Court (a gain of 4,400 sq m) and Sovereign Gate, Kew Rd (recorded as a 2,600 m<sup>2</sup> and potentially House of Fraser at 5,777 m<sup>2</sup>. There are also a number of smaller vacant units.

## **Housing**

Unfortunately, Icen's report on Housing discusses units but not floor space and it tends to deal with the borough as a whole. We know that the London Plan requires 411 units to be built across the borough each year to 2029. But we saw earlier that the population in Richmond Town is set to decline slightly up to 2039. At a very rough guess of gross 65 m<sup>2</sup> per unit for accommodation the requirement for additional housing would be for around 27,000 m<sup>2</sup> per year across the borough.

## **Supply of Floor space.**

We are concerned that the character of Richmond Town, which is so important in attracting appropriate uses to the town and preserving the town's success for all stakeholders, will be harmed by an imbalance by amount and type in the development of floor space.

We welcome the recognition in the Local Plan of the implications, including the risks, of the new combined business land Use Class E and changes to permitted development rights. There is potential for change in Richmond Town's Key and Secondary Frontage and levels above ground floor and that this may provide beneficial flexibility but it introduces considerable risks of change to the town, which as the Urban Design Study 2021 says is of high sensitivity to change and extensive change is not appropriate. The Council's control is limited to conditions and planning obligations and Article 4 Directions. We note that Key and Secondary Frontage in Richmond Town is unchanged between the Local Plan 2018 and the new draft Local Plan.

## **Conclusion**

We recommend that the several reports on floor space be updated and co-ordinated and besides assessing the borough estimates that they also provide comprehensive estimates across all future uses for Richmond Town. Also, there needs to be a reliable pre-covid Base year stock take for all uses in Richmond Town - say 2019. At the moment the evidence is piecemeal or missing, notwithstanding our attempts at pulling the data together in this response. Furthermore, we believe it would be unwise to place too much weight on the quantitative estimates of the future. Instead there should be recognition of the uncertainties and risks by applying sensitivity analysis and focussing on planning controls the Council can deploy. We do not believe the estimates are sufficiently robust to support major development at Richmond Station or higher buildings.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.



**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	19 Managing Impacts
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Policy 19 Managing Impacts**

Evening and Night Time Economy. We note support throughout the Local Plan to Richmond Town's Night Time economy and in some cases extending to the Riverside and Richmond Green. We welcome the caveat in the Local Plan, stated in Policy 19, Managing Impacts, that there is a combined and cumulative impact that needs to be controlled and that amenity of residents needs to be protected. It may be semantics but we recommend greater distinction between the evening and night time economies with the later applying to the late evening early hours of the morning.

Richmond town and surrounding areas have one of the highest ratios of pubs and bars to residents in the whole of London and moreover confined to a small area by the Thames and railway line. Public transport is reduced by midnight and is very limited shortly thereafter. Police and cleansing resources are not available at night time. We support the evening economy, and increasing family use, but the town needs to wind down before midnight so residents can get their eight hours sleep as advised by the WHO, difficult as this is with Heathrow night flights starting at 4:30am.

We note Policy 19 does enable the Council to limit closing hours of premises. But we urge the Local Plan to go further. Night time economy infers activity past 11pm into the early hours of the morning and we would urge the Local Plan to explicitly discourage this in Richmond Town, but of course recognising there may be exceptions. Disturbance of residents arises to those living in the heart of the town as well as on and around Richmond Green and along the Riverside which also includes resident disturbance on the Twickenham riverside. We urge better distinction between the evening and night economies.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	28 Local character and design quality (Strategic Policy)
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 28 – Local character and design quality (Strategic Policy)**

The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework .

The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	29 Designated heritage assets
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Policy 29 – Designated heritage assets**

No change proposed.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	30 Non-designated heritage assets
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Policy 30 – Non-designated heritage assets**

No change proposed.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.



**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	35 Green Belt, Metropolitan Open Land and Local Green Space
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Policy 35 – Green Belt, Metropolitan Open Land and Local Green Space**

Under the heading ‘Proposed changes to the Policies Map’ the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under ‘Policies Map for the Local Plan Review, 2015-2018’ in the part of the Council’s current Planning Policy web-site dealing with the current ‘Adopted Local Plan’ (adopted in July, 2018), it is clearly stated that ‘The Council’s Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020’. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.

(In Arup’s 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 ‘Parcel’ (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens ‘Parcel’ – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside ‘Parcel’ – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the

south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that 'the eastern third of the parcel, is developed and does not meet the MOL criteria' and that its MOL status should be considered further. The parcel is certainly NOT 'largely inaccessible to people' as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.

In relation to the The Green and Little Green, Richmond 'Parcel' – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of *The Buildings of England – London 2: South* as 'one of the most beautiful urban greens surviving anywhere in England', Richmond Green possesses not only considerable architectural, historic and landscape interest and significance, but importantly, constitutes a public open space of outstanding amenity value to the local and wider community.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	37 Public open space, play, sport and recreation
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 37 – Public open space, play, sport and recreation - No change proposed.**

No change proposed.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	43 Floodlighting and other external artificial lighting
		Place-based strategy	
		Site Allocation(s) no./ name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 43 – Floodlighting and other external artificial lighting**

No change proposed.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.



**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	44 Design Process
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 44 – Design Process**

The wording of Part B of the Policy needs to be amended to omit reference to ‘the design guidance for the relevant character area as specified within the Urban Design Study 2021’ insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in ‘F. Richmond and Richmond Hill’ (on page 255).

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	45 Tall and mid-rise zones
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 45 –Tall and mid-rise zones**

The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a ‘Tall’ or ‘Mid-rise’ buildings. Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of ‘Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3\* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading ‘F. Richmond and Richmond Hill’ relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). \* In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.

Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that ‘Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land’ has no relevance at all to the existing urban character of Richmond, its sustainable

development, its enhancement or the provision of 'affordable housing' for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Draft new Local Plan Introduction Section 2.44 and 2.45 Heathrow	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Draft new Local Plan Introduction Section 2.44 and 2.45 Heathrow**

The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that *'The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights,..'* *'The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.'*

There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect.

Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).

There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.



There are other national noise policies that could be deployed to deal with Heathrow noise.

At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.

Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.

We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

Signed:  
Peter Willan,  
Paul Velluet,  
Laurence Bain  
31 January 2022

# DRAFT LOCAL VIEWS SUPPLEMENTARY PLANNING DOCUMENT (SPD)

## Richmond-Upon-Thames Council (the Council) Consultation Response from The Friends of Richmond Green (FoRG) 5 September 2022

### INTRODUCTION

This response is written on behalf of the Friends of Richmond Green. FoRG are a long established amenity group covering around 350 households around Richmond Green and Little Green and in the vicinity down to the river Thames. We aim to preserve the special qualities, character and setting of the historic Richmond Green. The Green is a wonderful setting with many historic views and vistas and is a major attraction for people visiting the town, its shops and offices and is much appreciated by the many residents in the vicinity of the Richmond Green as well as residents in the town's wider reaches. We believe Harm to the Site and setting should be avoided at all costs. FoRG is a member of the Town Centre Group and Old Deer Park Working Group, both of which engage fully with the Council. We work closely with the Council's Parks and Tree Teams.

The Richmond Green, Richmond Riverside, Central Richmond and Richmond Hill Conservation Area Studies are being refreshed with the consultations just ended. We understand the Old Deer Park Conservation Area will be refreshed in the near future along with other Conservation Area Studies in the borough. It will be important to integrate the Local Views SPD with the five Conservation Area Statements and Management Plans.

Some of the adopted and new proposed views require gaps and some of these are currently impeded by trees and vegetation which we identify in this response.

We have approached the subject of views in the context of the Local Plan Policy LP5 and the relevance of the views to the setting of Heritage assets and to visual amenity. LP5 Views and Vistas says *'Seeks to protect and improve the quality of views, vistas, gaps and the skyline which contribute significantly to the character and quality of the local and wider area.'*

For ease of reference we include in the Annex the data sheet for each of the adopted and new views proposed. The Old Deer Park Working Group are also responding to the consultation and we recommend cross referencing with their response. Their focus is on the Old Deer Park Conservation Area but when discussing Views they should not be confined to one or other Conservation Area.

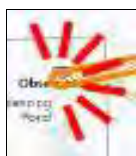
**In summary, the FoRG support the continuation of the adopted views and the proposed new views listed in the draft Local Views SPD and recommend some additional linear and landscape views for consideration. We also recommend ongoing maintenance of gaps in the landscape to preserve the views; we have sought to identify where these are currently impeded or are likely to be.**

**SELECTED VIEWS FROM DRAFT SPD RELEVANT TO THE RICHMOND GREEN, RICHMOND RIVERSIDE, CENTRAL RICHMOND AND RICHMOND HILL CONSERVATION AREAS**

C5.1	Twickenham Bridge (north-east)	Prospect	
C5.2	Twickenham Bridge (south-east)	Prospect	
C5.4	Richmond Road East Twickenham	Townscape	
C6.1	Richmond Lock & Weir	Prospect	
F1.1	Richmond Terrace Richmond Hill	Prospect	
F1.2	Richmond Green, Townscape	Townscape	New
F1.3	Richmond Bridge (north-west)	Prospect	
F1.4	Richmond Bridge (south-east)	Prospect	
F1.5	Richmond Riverside (northern bank)	Prospect	New
F1.6	Asgill House	Linear	
F2.1	Church of St Matthias	Townscape	New

**PRESENTATION**

1. We wish to make some suggestions on presentation to provide clarity and accuracy so that those less familiar with a view can be sure of the facts.
  - a. Most images for the views display a marker for the viewing location but C5.4 *Richmond Road, East Twickenham* omits any marker?



**Figure 1**  
Marker at  
Viewing  
Location

- b. The viewing location for three of the views appears to be variable - spread over an area, e.g. C5.4 *Richmond Road, East Twickenham (Townscape Adopted)*, and F1.2 *Richmond Green Surrounding Roads (The Green, Pembroke Villas and Portland Terrace) (Townscape New)*. In the case of Richmond Green we believe it is essential that the viewing locations be at any point 360 degrees around Richmond Green and should include Maids of Honour Row as the fourth side of the Green but this has been omitted from the description. We discuss this later.

c. Local Views map

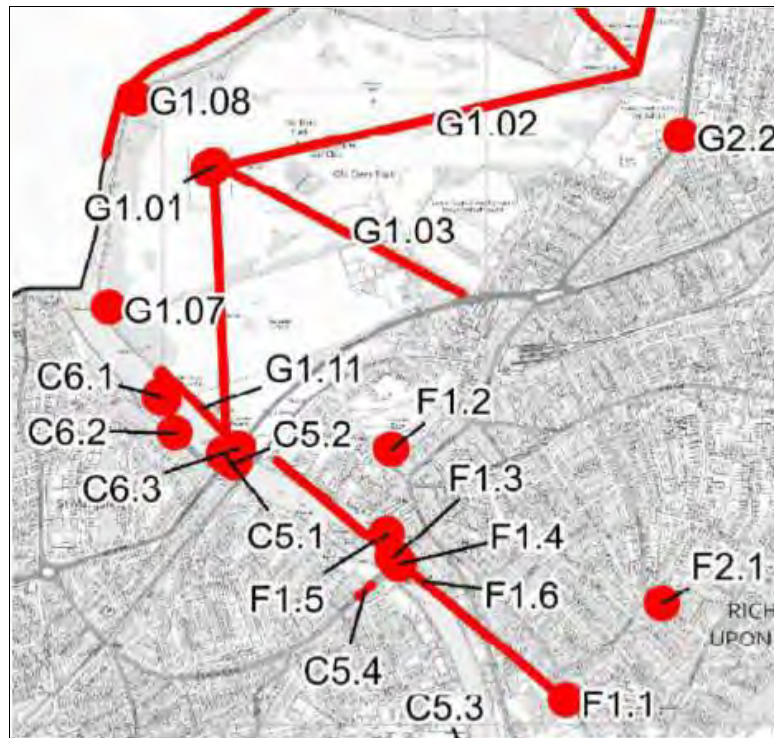


Figure 2 Extract from Local Views map July 2022

- i. Detail is insufficient to be able to identify viewing locations and specific view end points (often the end points can be guessed at but not for all of the views).
  - ii. It would seem the map shows the one linear view relevant to FoRG with a line. The map is busy with views and it would help to distinguish the views by having directional arrows on the lines and an arrow for each of the non-linear views.
- d. Consistency on titles of views could be improved. Most of the titles start with the viewing location, e.g. Richmond Bridge. But F1.6 is titled *Asgill House* and F2.1 is *Church of St Matthias*. In the case of the latter we have not been able to identify the precise viewing location.
- e. Images might be improved:
- i. C5.4 *Richmond Road, East Twickenham (Townscape Adopted)*. On the other side of the Richmond Road there is a K6 Sir Giles Gilbert Scott telephone kiosk which is Grade II listed and it is of significance in conjunction with the adjacent Grade I listed Richmond Bridge (which is not mentioned as such but should be). It may be difficult to include the K6 kiosk in the foreground of the image but we suggest it be attempted and at least its significance be mentioned in the view description. Figure 4 is for illustration only.



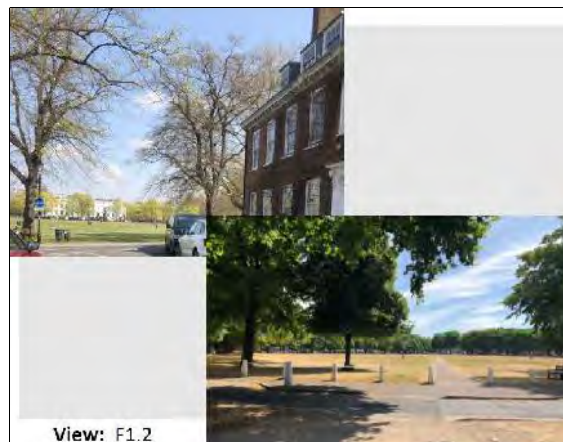


**Figure 3** C5.4 Richmond Road, East Twickenham Prospect Adopted



**Figure 4.** C5.4 Richmond Road, East Twickenham

- ii. F1.1 *Richmond Terrace, Richmond Hill (Prospect Adopted)*. Half the image is taken up by the Terrace, which seems excessive.
- iii. F1.2 *Richmond Green Townscape New*. Two images are provided. These are not perhaps the best selection and are similar in view. We suggest four images showing views of all four sides and possibly trees without leaves would be preferable although the trees are of substantial significance throughout the seasons. We recommend the viewing locations be at any point 360 degrees around Richmond Green and should include Maids of Honour Row as the fourth side of the Green but this has been omitted from the description. Now that the development of the House of Fraser site is being considered we suggest it is opportune to restore the view as a protected view along with the townscape views from the rest of Richmond Green. Figure 6 shows the existing view with ugly plant and machinery on top, which in any development we suggest should be removed and without an additional floor and plant-room on top.



**Figure 5** F1.2 Richmond Green, Townscape New proposed by draft SPD



**Figure 6** View from Richmond Green Existing 80 George Street with Heritage Assets in foreground, 2020

- iv. F1.3 Richmond Bridge (north-east). The two images in a wide angled way distort the bridge itself.
- v. F1.6 Asgill House. Asgill House is difficult to identify from the image.

### **TREE MANAGEMENT NEEDED TO IMPROVE VIEWS**

1. *F1.6 Asgill House (Linear Adopted).*

We suggest the View of Asgill House Linear Adopted from the Terrace, Richmond Hill would benefit from opening the tree gap.



**Figure 7** F1.6 Asgill House

## NEW VIEWS PROPOSED BY FRIENDS OF RICHMOND GREEN

### 1. **Richmond Little Green Townscape**

We recommend the viewing locations be at any point 360 degrees around the Little Green in a similar manner to that proposed for the main Richmond Green (see above).



**Figure 8** Richmond Little Green Townscape

### 2. **Gatehouse to Old Palace Richmond Green Townscape**

On the assumption a 360 degree view is adopted for Richmond Green then this view of the Gatehouse to the Old Palace would be included and not necessary as a separate view.



**Figure 9** Gatehouse to Old Palace, Richmond Green Townscape



### 3. Old Palace Lane Townscape



**Figure 10** Old Palace Lane Townscape. Credit Richmond Museum

4. **Twickenham Road Footbridge to St Matthias Church Spire (Linear)**

St Matthias Church spire is a significant landmark with views from many parts of southwest London. Figures 11 and 13 show a view from the Twickenham Road Footbridge and another from within the ODP Recreation Ground. Figure 12 shows a view from Richmond Green. We suggest consideration be given to adopting one or more of these views.



**Figure 11** Twickenham Road Footbridge view to St Matthias Church, Richmond Hill



**Figure 12** Richmond Green view to St Matthias Church, Richmond Hill



**Figure 13** ODP view to St Matthias Church, Richmond Hill



5. **View from Richmond Hill towards Richmond Town**

At present trees and other vegetation blocks any view from the Terrace Richmond Hill towards Richmond Town. Consideration might be given to opening up a view. See Figure 14.



**Figure 14** Richmond Hill Terrace view towards Richmond blocked by trees, etc.

6. **View from Richmond Park Pembroke Lodge towards Richmond Town**

? Is there a view to be created.

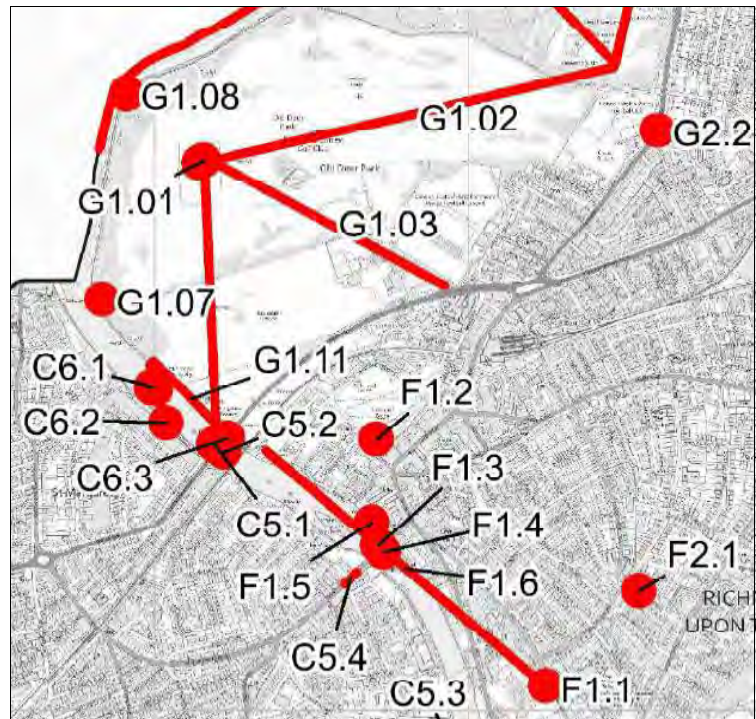
Vivien Harris, Chair Friends of Richmond Green

Peter Willan, Member of the Friends of Richmond Green Exec.

Contact [REDACTED]

Annex Attached

**ANNEX**  
**SELECTED VIEWS FROM DRAFT SPD RELEVANT TO THE RICHMOND GREEN, RICHMOND RIVERSIDE, CENTRAL RICHMOND AND RICHMOND HILL CONSERVATION AREAS**



**Figure 1** Extracted from Local Views Map July 2022 for consultation

- C5.1 Twickenham Bridge (north-east), Prospect
- C5.2 Twickenham Bridge (south-east), Prospect
- C6.1 Richmond Lock & Weir, Prospect,
- C6.2 St Margarets Riverside, Prospect
- C6.3 View of the Great Pagoda St Margarets, Linear
- G1.1 Kings Observatory, Old Deer Park, Linear
- G1.2 King's Observatory towards Kew Gardens, Linear
- G1.3 Kings Observatory towards Richmond Town Centre, Linear
- G1.11 Old Deer Park Riverside, Prospect

Character Area Name:

## East Twickenham Residential

View Name and Reference:

### Twickenham Bridge (north-east) (C5.1)

View Type:

**Prospect**

#### Description of View

View from Twickenham Bridge (north-east); travelling into London, spectacular view open up from both the railway and road bridge; encompassing:

- (left) the Victorian Richmond Lock and Weir and the open landscape of the Old Deer Park (usually flooded in winter);
- (left) glimpsed views of the King's Observatory may be possible in the winter;
- (centre) Old Palace Yard river front gardens; and, Richmond Riverside terraces and commercial activity; and,
- (right) view along the River Thames toward Richmond Hill, the Terrace Gardens, and Petersham Meadows.



**View:** C5.1



**GIS Mapping:** C5.1

Viewing Place:

**Bridgescape view (wide)**

Viewing Location:

**Twickenham Bridge**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 9, 10 and view 11 (from Richmond Bridge to Twickenham Bridge)**

**Adopted Local Plan landmarks – Twickenham Bridge, Richmond Lock, Kew Observatory**

#### Visual Management Guidance

Foreground:

Twickenham Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames: urban and landscape character

Background:

Richmond Town Centre buildings (rising on Richmond Hill);  
Richmond Bridge



Character Area Name:

## East Twickenham Residential

View Name and Reference:

### Twickenham Bridge (south-east) (C5.2)

View Type:

**Prospect**

#### Description of View

View from Twickenham Bridge (south-east); travelling out London, spectacular view open up from both the railway and road bridge; encompassing:

- a) (left) Corporation Island, private gardens and moorings edging the River Thames; and,
- b) (right) Ranelagh Drive and St Margarets Riverside.



**View:** C5.2



**GIS Mapping:** C5.2

Viewing Place:

**Bridgescape view (wide)**

Viewing Location:

**Twickenham Bridge**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 9 to 12**

**Adopted Local Plan landmark – Twickenham Bridge**

#### Visual Management Guidance

Foreground:

Twickenham Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames: landscaped embankment and parklands

Background:

Residential housing and gardens

Character Area Name:

## East Twickenham Residential

View Name and Reference:

### Richmond Road, East Twickenham

(C5.4)

View Type:

**Townscape**

#### Description of View

Sequential view from Richmond Road, East Twickenham towards and over Richmond Bridge; encompassing:

- (High Street) three-storey commercial properties framing view north-east towards bridge; Richmond Hill closes view at skyline;
- Road rises with bridge over the River Thames affording short and long distant views of Richmond and surrounds, with the terraces of Richmond Riverside ahead to the left, the mature plane trees to the right; and,
- The road continues to rise with view terminating on the Art Deco facade of the theatre/cinema building.



**View:** C5.4



**GIS Mapping:** C5.4

Viewing Place:

Directional/ Point view (specific)

Viewing Location:

Richmond Road, East Twickenham

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

**New view (proposed)**

Urban Design Study

Adopted Local Plan landmark – Richmond Bridge

#### Visual Management Guidance

Foreground:

Richmond Road, East Twickenham

Middle ground:

Views form Richmond Bridge

Background:

Theatre/ cinema building and Richmond Hill



Character Area Name:

## St Margarets Residential

View Name and Reference:

### Richmond Lock and Weir

(C6.1)

View Type:

**Prospect**

#### Description of View

Long view from Richmond Lock and Weir (Grade II\*); encompassing:

- a) (north) along the River Thames towards Isleworth Ait including winter view into the Old Deer Park and towards the King's Observatory and Kew gardens; and,
- b) (south) along towards the Star and Garter and Richmond Hill; framed view under numerous bridges.



**View: C6.1**



**GIS Mapping: C6.1**

Viewing Place:

Riverscape view (wide)

Viewing Location:

Richmond Lock and Weir's pedestrian walkway

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

Adopted Local Plan landmarks – Richmond Lock, Kew Observatory, Star and Garter Urban Design Study

**New view (proposed)**

#### Visual Management Guidance

Foreground:

Richmond Lock and Weir: Victorian cast iron metal work, industrial and decorative; elevated view over the river

Middle ground:

River Thames

Background:

The River Thames (bend in the river eventually creates a landscape closure to view); Richmond Hill to the south

Character Area Name:

## Richmond Town Centre and Riverside

View Name and Reference:

### Richmond Terrace, Richmond Hill (F1.1)

View Type:

#### Prospect

#### Description of View

Elevated, wide scenic, and sequential view from Richmond Terrace Walk (Grade II\*) across the River Thames valley; multiple viewing points along the viewing terrace; encompassing:

- (foreground) the Victorian Terrace Gardens linking with Buccleuch Gardens towards the river;
- (wider foreground) pastoral-looking Petersham Common and Meadow setting the foreground landscape to Petersham Lodge (Grade II) - gleaming white building against the green of the meadow and the darker backdrop of cedars and the horse chestnut avenue;
- (background) the River Thames from Twickenham Bridge, Corporation Island towards Teddington - ranging character from town centre to riparian landscape edge; and,
- (long-distant) views across to Windsor.

The view sweeps over much the same Arcadian landscape which had such influence on the taste and designs of the 18th century. From as early as the mid 17th century a seat had been placed overlooking the view (RPG). It is a view that has inspired musicians, painters, including the famous painting by Turner, and poets from around the world. In 1902 it became the first and only view to be protected by Act of Parliament. From the top of the hill you can see the sun setting over the Chilterns.



View: F1.1



GIS Mapping: F1.1

Viewing Place:  
Landscape view (wide)

Viewing Location:  
Richmond Terrace Walk

Viewing Co-ordinates:  
E: n/a  
N: n/a

Reference Policy:  
Act of Parliament (The Richmond, Petersham and Ham Open Spaces Act 1902)  
Adopted Local Plan  
Urban Design Study: view 5  
Thames Landscape Strategy: Landscape character reach - Richmond (view potentially the most significant view identified in TLS)  
Registered Parks and Gardens: Richmond Terrace Walk Park and Garden (Grade II\*); Terrace and Buccleuch Gardens Park and Garden (Grade II)

#### Visual Management Guidance

Foreground:  
Richmond Terrace Walk

Middle ground:  
River Thames valley and meadows

Background:  
Teddington to Twickenham

Character Area Name:

## Richmond Town Centre and Riverside

View Name and Reference:

### Richmond Green

(F1.2)

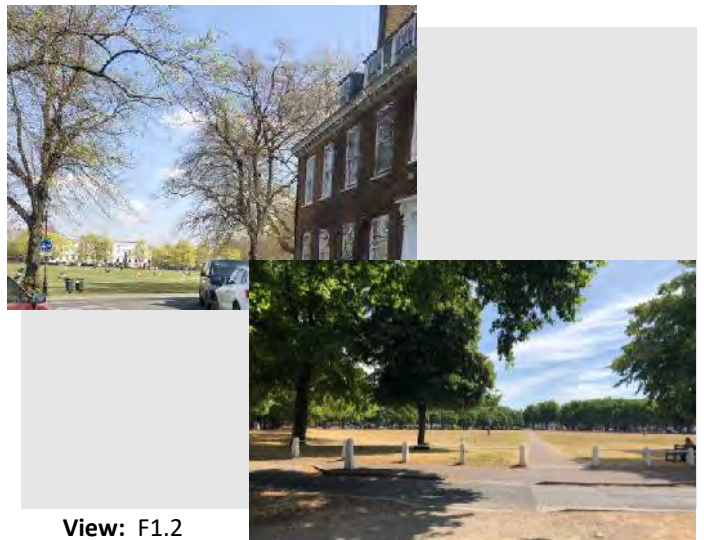
View Type:

### Townscape

#### Description of View

Uninterrupted, open view across Richmond Green, surrounded by a frame of historic buildings contributing to the view's setting; including, multiple glimpses from surrounding roads and narrow lanes which radiate off The Green. The Green offers an open landscape expanse which offers a scenic contrast with the enclosed alleyways to the town centre.

CA appraisal: The Green is a fine example of an early urban (village) Green with a feeling of formal elegance and provides a fittingly grand setting of the houses that surround it. Little built form intrudes into the sky above the surrounding buildings emphasising the inward looking, almost isolated feel of the space.



View: F1.2



GIS Mapping: F1.2

Viewing Place:

Parkscape view (wide)

Viewing Location:

Surrounding roads (The Green, Pembroke Villas and Portland Terrace)

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

**New view (proposed)**

#### Visual Management Guidance

Foreground:

The Green

Middle ground:

Spaces and landscaping around The Green

Background:

Surrounding buildings



Character Area Name:

## Richmond Town Centre and Riverside

View Name and Reference:

### Richmond Bridge (north-west)

(F1.3)

View Type:

**Prospect**

#### Description of View

View west (downstream) from Richmond Bridge, along the River Thames towards Twickenham Railway; encompassing:

- Richmond Riverside: commercial and leisure activity (restaurants, retail, boat hire moorings);
- (foreground right) the Old Town Hall and Palm Court Hotel and landmark belvedere tower (Grade II) fronting the terraces;
- (middle distance) the White Cross hotel on the riverside and Asgill House (Grade I); and,
- (background) arched Twickenham road and railway bridges, Richmond Lock and Weir, and the mature landscape intruding of Old Deer Park beyond; and wooded Corporation and Flowerpot Islands.



**View: F1.3**



**GIS Mapping: F1.3**

Viewing Place:

**Bridgescape view (wide)**

Viewing Location:

**Richmond Bridge**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 11**

**Adopted Local Plan landmark – Richmond Bridge**

#### Visual Management Guidance

Foreground:

Richmond Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames

Background:

Twickenham Railway Bridge; with landscaping beyond



Character Area Name:

## Richmond Town Centre and Riverside

View Name and Reference:

### Richmond Bridge (south-east)

(F1.4)

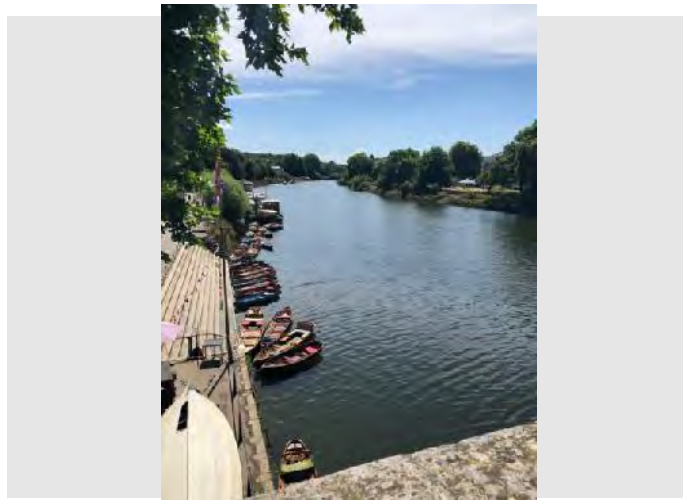
View Type:

**Prospect**

#### Description of View

View east (upstream) along the River Thames from Richmond Bridge towards Richmond Hill; encompassing:

- The rising slopes of Richmond Hill - development rising up the hill framed/screened by landscape to a tree-lined horizon;
- Contrasting river edges - wooded and vegetated river banks, providing a semi-natural character; urban to residential edge; pastoral, water meadows in the distance.



**View:** F1.4



**GIS Mapping:** F1.4

Viewing Place:

**Bridgescape view (wide)**

Viewing Location:

**Richmond Bridge**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 12**

**Adopted Local Plan landmark – Richmond Bridge**

#### Visual Management Guidance

Foreground:

Richmond Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames

Background:

Petersham Meadow and Richmond Hill to the skyline

Character Area Name:

## Richmond Town Centre and Riverside

View Name and Reference:

### Richmond riverside (northern bank)

(F1.5)

View Type:

**Prospect**

#### Description of View

Multiple sequential view along Richmond Riverside, adjacent to the River Thames' northern bank; encompassing:

- (upstream) open landscape of Terrace and Buccleuch Gardens (Grade II); looking downstream towards the stone-arched Richmond Bridge framing downstream view;
- (centre) river edge, open parkland spaces framed by the elevated properties along Petersham Road; sheltered Bridge House Gardens, and the Riverside terraces;
- (downstream) The historic White Cross, former Richmond Palace and walled garden, leading along Cholmondeley Walk under Twickenham Railway Bridge towards the Old Deer Park; and,
- View to the opposite green river bank, characterised by mature trees and mansion blocks in East Twickenham.



**View: F1.5**



**GIS Mapping: F1.5**

Viewing Place:

**Riverscape view (wide)**

Viewing Location:

**River Thames Pathway**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan landmark – Richmond Bridge**

**New view (proposed)**

#### Visual Management Guidance

Foreground:

River Thames Pathway

Middle ground:

River Thames

Background:

Urban and landscape frame

Character Area Name:

**Richmond Town Centre and Riverside**

View Name and Reference:

**Asgill House**

**(F1.6)**

F1

L

View Type:

**Linear**

**Description of View**

View from Richmond Hill to Richmond Bridge and Asgill House. Asgill House (Grade I), an 18th-century Palladian villa, sits within the former historic grounds of Richmond Palace, acting as the ending visual termini to Richmond riverside (downstream).



**View: F1.6**



**GIS Mapping: F1.6**

Viewing Place:

**Directional/ Point view (specific)**

Viewing Location:

**Richmond Hill**

Viewing Co-ordinates:

**E: tbc**

**N: tbc**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 5**

**Visual Management Guidance**

Foreground:

**Terrace Field**

Middle ground:

**Landscape frame, from the slope of Richmond Hill**

Background:

**Asgill House**



Character Area Name:

**Richmond and Richmond Hill**

**Residential**

View Name and Reference:

**Church of St Matthias**

**(F2.1)**

View Type:

**Townscape**

**Description of View**

Multiple short distance view of the Church of St Matthias (Grade II) and its distinctive stone spire, distinctive at the top of Richmond Hill (elevation 195 feet). View from surrounding residential streets including Park Road, Mount Ararat Road, Church Road and King's Road. Described by Pevsner as 'the grandest church in Richmond.'



**View: F2.1**



**GIS Mapping: F2.1**

Viewing Place:

**Directional/ Point view (specific)**

Viewing Location:

**Richmond residential properties**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan landmark – St Matthias Church**

**St. Matthias Conservation Area**

**New view (proposed)**

**Visual Management Guidance**

Foreground:

Richmond residential properties

Middle ground:

Richmond residential properties

Background:

Due to elevated position, it is cast against the skyline



**RICHMOND UPON THAMES LOCAL PLAN**  
**Publication consultation on the Council's final version of the Plan and final SA report**  
**(Regulation 19)**  
**RESPONSE FROM PROSPECT OF RICHMOND**

*Response from Prospect of Richmond, dated 31 July 2023 (extension granted by Richmond upon Thames Council ref email from Joanne Capper (Principal Policy and Information Planner) to Peter Willan dated 20 July 2023)*

**PROSPECT OF RICHMOND**

Personal Details:

Title	Messrs
Name	Peter Willan, Paul Velluet and Laurence Bain
Organisation	Prospect of Richmond
Address	[REDACTED]
Telephone	[REDACTED]
E-mail address	[REDACTED]

Prospect of Richmond is a group of local residents that have extensive knowledge and experience of living in or near Richmond Town and the surrounding area. Two of us have been past chairs of the Richmond Society and one a past chair of the Friends of Richmond Green and one of us chairs the Richmond Heathrow Campaign comprising the Richmond Society, Kew Society and the Friends of Richmond Green. While not part of this response we have extensive involvement with the adjacent Old Deer Park. Two are architects. Individually and together, we have been involved with many planning, licensing, traffic, heritage, charity, cultural and other matters. We are dedicated to the preserving and improving the area for the benefit of residents and other stakeholders. Over many years we have engaged extensively with Richmond upon Thames Council (Council) and are keen to continue doing so.

**BASIS OF OUR RESPONSE**

Prospect of Richmond has examined the schedule of extracts from the Council's Consultation Statement of June 2023 detailing responses from the Prospect of Richmond in January 2022 to the Pre-Publication draft Local Plan and the Council's responses. The schedule was prepared by the Council and emailed to the Prospect of Richmond on 20 July 2023. The schedule is attached as Annex 1.

We attach the Prospect of Richmond's full response to the Pre-Publication draft Local Plan 2022 for reference in Annex 2. The Site Allocation numbering has changed in the current draft Local Plan by one (e.g. Site Allocation 26 is now 27). The 2022 response referred to Arup's Urban Design Study 2021 and Arup's Metropolitan Open Land Review Annex Report, which have both been updated in 2023. Our 2022 responses remain unchanged notwithstanding the updates of the Arup reports. Litchfield's Stage 1 Report in 2021 on Retail, Non-retail services and Leisure Floor space has been followed by a Stage 2 Report in 2023. Our response to Policy 18 contained detailed figures from the Stage 1 Report, which have now been updated. However, we have not revised our response as we do not believe the substance of our response to Policy 18 should change.

Circumstances existing in January 2022 continue to evolve, especially in regard to Government Planning Policy but also in regard to policy drivers such as housing demand, economic, commercial and high street recovery from the pandemic. The pace of change makes it hard for a Local Plan to keep up. However, we are not suggesting any changes to the substance of the outstanding issues.

The Friends of Richmond Green (FoRG) responded in September 2022 to the Council's consultation on a draft SPD Local Views. Our understanding from Joanne Capper in her aforementioned email of 20 July 2023 is that it is the Local Plan which has to formally designate a 'new' view (i.e the name of that view and it being shown on the Policies Map), so the Council has put the draft Local Views SPD 'on hold' until they know what the Inspector will recommend as part of the Local Plan process (they will confirm the designation of new views). Once that is clear, the Council can pick up the details again in the Local Views SPD (i.e. take it to adoption, or a further consultation if it is considered necessary, which will include revisiting/producing the detailed proformas for each view). We wish to include as part of our response to the draft Local Plan the proposed views and related issues in FoRG's 2022 response on the draft SPD and accordingly include the FoRG's response to the draft SPD on Local Views as Annex 3. FoRG have given us permission to use their submission.

We note and welcome the Council's responses to our representations **12, 58, 97, 141, 171, 214, 586 (first sentence only), 678, 795, 807, 878, 885, 952 and 1014.**

We note and are disappointed and concerned by the Council's failure to respond positively to our following representations and accordingly must maintain our objections to the Local Plan - Publication Version for the reasons set out in our previously submitted comments: **213, 217, 241, 279, 586, 587, 588, 596, 597, 600, 603, 609, 616, 618, 619, 673, 805, 812, 865, 929, 1019, 1032, 1033 and the penultimate un-numbered item in the schedule.**

Given the substantial and undue reliance given in the Plan to Arup's Urban Design Study, 2021 (as updated in 2023) and to Arup's Metropolitan Open Land Annexe Report Review of 2021 (as updated in 2023), and the questionable aspects of the documents on which we commented critically in January, 2022, we would urge that the 2023 versions of both documents should be considered in detail by the Inspector in considering the Local Plan - Publication Version.

We have given the Friends of Richmond Green permission to refer to and endorse this Prospect of Richmond response and we would be pleased to work with them in resolving the outstanding issues with the Council.

Signed:

Peter Willan, BSc Eng(Hons), MBA, ARSM, FCMA, FEI, HonRCM  
Paul Velluet, B.A. Hons, B.Arch. Hons, M.Litt., R.I.B.A., I.H.B.C.  
Laurence Bain, Dip Arch, ARB, RIBA

31 July 2023

Attached:

Annex 1 Schedule of extracts from the Council's Consultation Statement June 2023  
Annex 2 Prospect of Richmond's full response to the Pre-Publication draft Local Plan 2022  
Annex 3 Friends of Richmond Green's response to the draft SPD on Local Views 2022

Extracts from the [Consultation Statement](#) – comments from Prospect of Richmond, FoRG and the ODPWG

(Note there were separate tables with responses to some of the specific questions raised in the consultation, with the last table showing all the detailed responses in Plan order.)

Table 1: All responses received (to question 4 on the [response form](#)) in relation to the strategic vision (section 3 of the draft Plan) (as received) and the Council's officer response

Rep No.	Name	Comment	Council's response
12	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.	Support noted.
42	Vivien Harris, Friends of Richmond Green	<p>The Friends of Richmond Green (FoRG) is an amenity action group. Our key aims and objectives are:</p> <ul style="list-style-type: none"> <li>• to promote public interest and civic pride in Richmond Green and vicinity</li> <li>• to improve the quality of life and long-term attractiveness for residents</li> <li>• to improve the character and quality of the built and natural environments</li> <li>• to improve the cleanliness and appearance of the streets and public spaces</li> <li>• to contain traffic while recognising the parking needs of residents and visitors</li> <li>• to encourage responsible use of The Green and surrounding area</li> </ul> <p>FoRG as an amenity group is over 50 years old and is run by an executive committee based on a formal constitution. The Friends of Richmond Green fully endorse and support the response by Prospect of Richmond to the new draft Local Plan. We have read the response and have been engaged with the respondents on the content. For clarification, the response is a Prospect of Richmond response with Friends of Richmond Green support and endorsement.</p>	Noted.
45	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.	Support noted.

Table 2: All responses received (to question 5 on the [response form](#)) in relation to the strategic objectives (section 3 of the draft Plan) (as received) and the Council's officer response

Rep No.	Name	Comment	Council's response
58	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.	Noted.

Off

86	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.	Noted.
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Table 3: All responses received (to question 6 on the [response form](#)) in relation to Policy 1. Living Locally and the 20-minute neighbourhood (section 4 of the draft Plan) (as received) and the Council's response

Rep No.	Name	Comment	Council's response
97	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with Policy 1 and the 20-minute neighbourhood.	Support noted.
130	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with Policy 1 and the 20-minute neighbourhood.	Support noted.

Table 4: All responses received (to question 7 on the [response form](#)) in relation to Policy 2. Spatial Strategy: Managing change in the borough (section 4 of the draft Plan) (as received) and the Council's response

Rep No.	Name	Comment	Council's response
141	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	We agree broadly with Policy 2, Spatial Strategy: Managing Change in th borough.	Support noted.
163	Peter Willan and Paul Velluet, Old Deer Park Working Group	We agree broadly with Policy 2, Spatial Strategy: Managing Change in th borough.	Support noted.

Table 5: All responses received (to question 8 on the [response form](#)) in relation to the place-based strategies (sections 6 to 14 of the draft Plan) (as received) and the Council's response

Rep No.	Name	Comment	Council's response
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Off

171	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Our response here on the Place-based Strategy: Richmond Town and Richmond Hill and Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree.	Noted.
198	Peter Willan and Paul Velluet, Old Deer Park Working Group	Our response here on the Place-based Strategy: Kew and on Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree. [See comment 620 on the place-based strategy for Kew]	Noted.

Table 6: All responses received (to questions 9/10/11 on the [response form](#)) in relation to general comments on the Local Plan (detailed policies etc) (as received, in Plan order) and the Council's response

Rep No.	Full Name	Part of plan commenting on	Detailed Comments	Council's response
212	Peter Willan and Paul Velluet, Old Deer Park Working Group	General (in relation to title of the Plan, page numbers)	Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. Needs remedying. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. Needs remedying. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. Needs remedying.	The shortened reference to the Richmond Local Plan is considered acceptable as it is clear it is a boroughwide plan. The main audience is expected to view the Plan online (either as a pdf where the hyperlinks aid navigation and page numbers appear, or using a web-based html version which has a navigation pane), but it is intended that page numbers will be added to the final version.
213	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General (in relation to title of the Plan, page numbers)	Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. Needs remedying. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. Needs remedying. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. Needs remedying.	See response to comment 212.
214	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to Policies Map)	Neither Section 2 nor Section 15 appears to included any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.	Paragraph 2.18 referred to the Policies Map, with the document explaining it indicates the proposed changes to the Policies Map. There was a delay to the update of the existing Policies Map to reflect the Local Plan adopted in July 2018 and March 2020; an <a href="#">interactive map</a> which displays the designations and a <a href="#">PDF version</a> (due to its large file size only a low resolution version is available online).

Off

215	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to Policies Map)	Neither Section 2 nor Section 15 appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.	See response to comment 214.
217	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to evidence base)	So much in the Draft Local Plan derives from questionable analysis and questionable recommendations in Arup's Urban Design Study and, in more limited part, this in Arup's 156-page Metropolitan Open Land Review Annexe Report. Indeed, all these need to be firmly challenged.	Noted. A relevant and up-to-date evidence base underpins the Plan. See also response to comment 594 regarding the methodology underpinning the Urban Design Study. See also response to comment 929 regarding points raised on the MOL review.
218	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to evidence base)	So much in the Draft Local Plan derives from questionable analysis and recommendations in Arup's Urban Design Study and, in more limited part, this in Arup's 156-page Metropolitan Open Land Review Annexe Report. Indeed, all these need to be firmly challenged.	See response to comment 217.

241	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Paragraphs 2.44 and 2.45, in relation to Heathrow	<p>We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re-allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the Introduction paragraphs 2.44 and 2.45.</p> <p>The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that <i>'The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights...'</i> <i>'The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.'</i></p> <p>There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect.</p> <p>Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).</p> <p>There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.</p> <p>There are other national noise policies that could be deployed to deal with Heathrow noise.</p> <p>At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.</p> <p>Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.</p> <p>We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.</p>	<p>As stated in the Plan, the airport does not lie within the borough boundary and therefore there is not a policy on Heathrow.</p> <p>Update the references to the Council's position to reflect the Corporate Plan 2022 – 2026.</p> <p>The UK Civil Aviation Authority has set out a <a href="#">vision for the future of UK airspace</a> in January 2023 to help deliver quicker, quieter and cleaner journeys, as well as create more capacity for the benefit for those who use and are affected by UK airspace. The aviation and aerospace regulator has developed a refreshed Airspace Modernisation Strategy, which includes measures to introduce environmental sustainability as an overarching principle to be applied through all modernisation activities, and to provide a clear strategic path for regulatory policy and requirements. It makes it clear that the role of airspace modernisation in respect of noise impacts will be considered, and can be responsible for delivering noise reduction where it has an element of control.</p>
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242	Peter Willan and Paul Velluet, Old Deer Park Working Group	Paragraphs 2.44 and 2.45, in relation to Heathrow	<p>We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re-allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the Introduction paragraphs 2.44 and 2.45.</p> <p>The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that <i>'The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights...'</i> <i>'The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.'</i></p> <p>There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect.</p> <p>Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).</p> <p>There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.</p> <p>There are other national noise policies that could be deployed to deal with Heathrow noise.</p> <p>At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.</p> <p>Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.</p> <p>We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.</p>	See response to comment 241.
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278	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to sustainable growth)	<p>Sustainable Growth. We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to Policy 18. In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise "Improvement" as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.</p>	<p>Update the supporting text in section 2 setting out the Strategic Context and Trends to refer to the 2021 census and latest projections. There has been weaker population growth than the ONS had been predicting, but almost three quarters of population growth has been accounted for by those aged 65 and over. The latest GLA projections (2020-based) estimate much lower population growth, to reach 196,714 (identified capacity scenario), a 0.3% change by 2039. However, there remains uncertainty, with the GLA suggesting there could be stronger migration and a rebound from the pandemic. It is clear that population change remains a significant challenge, with a projected change in the age structure of those aged 65+ to increase by 50% by 2039. It is not considered necessary to look at a lower geographical scale for population change, because for example the spending in Zone 1 is not drawn just from the residents of Zone 1.</p>
279	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to sustainable growth)	<p>Sustainable Growth. We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to Policy 18. [see comment 805 in relation to Policy 18] In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise "Improvement" as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.</p>	<p>See response to comment 278.</p>

586 Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)

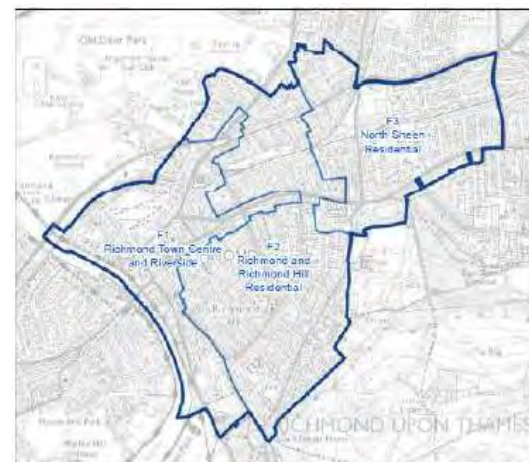
Prospect of Richmond is a group of local residents that have extensive knowledge and experience of living in or near Richmond Town and the surrounding area. Two of us have been past chairs of the Richmond Society and one a past chair of the Friends of Richmond Green and one of us chairs the Richmond Heathrow Campaign comprising the Richmond Society, Kew Society and the Friends of Richmond Green. While not part of this response we have extensive involvement with the adjacent Old Deer Park. Two are architects. Individually and together, we have been involved with many planning, licensing, traffic, heritage, charity, cultural and other matters. We are dedicated to the preserving and improving the area for the benefit of residents and other stakeholders. Over many years we have engaged extensively with Richmond-upon-Thames Council and are keen to continue doing so.

Place Definitions. We refer to Richmond Town as comprising the Conservation Areas for Richmond Town Centre, Richmond Green, Richmond Riverside and Richmond Hill. The use, character and value of the four components of Richmond are very different but it is this diversity, side by side in a relatively small area, that is so valuable. The whole is greater than the sum of the parts.

Local Plan Section 11 heading is 'Place-based Strategy for Richmond & Richmond Hill'. The study area is defined as 'Richmond Town Centre and Riverside, and the residential and mixed use areas into Richmond Hill and North Sheen'. These are character areas F1, F2 and F3 in the Urban Design Study 2021'. 'Richmond Town Centre and Riverside' (F1) is described as including Richmond Green. We believe the four components of Richmond Town should be separately identified in line with the boundaries of the Conservation Areas for Central Richmond, Richmond Green, Richmond Riverside and Richmond Hill and that the character areas should match the Conservation Area boundaries.

Confusingly, the extant 'Richmond & Richmond Hill Village Plan' (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD. We note parts of the two Riverside Conservation Areas are on the Twickenham side of the river Thames whereas the Local Plan boundary appears to be the centre of the river.

We have extracted the Character Area Map from Arup's Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.



Richmond & Richmond Hill. Urban design Study Dec 2021

				<p>Amend text in the character area profile to explicitly refer to the four conservation areas as being at the core of the town centre character area. Conservation areas and character areas represent different judgements and priorities. Whilst conservation areas aim to define aspects of heritage value, character areas aim to define areas of similar character. For consistency and ease of use, in general the character areas in the Urban Design Study 2021 aimed to follow conservation area boundaries wherever possible. However, Richmond was an example of where the conservation areas did not completely align with character – for example Richmond Riverside and Richmond Hill extend across the river into East Twickenham, and part of the Richmond Hill CA covers the riverside. The Richmond Hill CA also extends further to the south-east and encompasses areas which do not have a town centre character. Further, the character area boundary considered the town centre boundary which also does not align with conservation areas boundaries. It is overall considered that the current character areas are appropriate and no further changes are recommended.</p>
587	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Richmond & Richmond Hill	In the un-headed list of contents Section 3 is titled 'Place-based Strategy for Richmond & Richmond Hill' whereas it should be titled as 'Richmond Town Centre and Riverside, Richmond and Richmond Hill Residential and North Sheen Residential' – assuming that one accepts the highly questionable concept and structure of 'Character Areas (sic) as set out in Arup's 432-page Urban Design Study. Needs remedying.	The Urban Design Study divides the borough into nine high level 'places' which have been used to name the place-based strategies, as set out at the start of section 3 in the Urban Design Study. For simplicity these do not replicate in full the names of the 36 locally distinctive character areas. No amendments to the place-making strategy are considered necessary.

588	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Richmond & Richmond Hill in relation to Richmond BID.	We note the explicit reliance on the RBID and its Vision in the Local Plan Section 11 Place-Based Strategy for Richmond and Richmond Hill but we have not been able to find the Vision Report as evidence and are concerned that since the RBID is established by businesses alone and not residents there is likely to be a bias in favour of businesses. Also, the areas covered by the RBID are parts of Richmond Town Centre and not Richmond Green, for example where we wholly oppose commercial use, other than in the context of mixed use along Greenside. We are concerned that the democratic process may be at risk and while we are not saying this is intentional, we believe the matter needs to be resolved going forward. In so far as our response here is concerned, without the evidence we are not able to make a reasoned response on the RBID Vision included in the draft Local Plan at Placed-based Strategy- Richmond and Richmond Hill.	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. Further information about Be Richmond BID can be found on their website: <a href="https://berichmond.london/member-support/about-be-richmond">https://berichmond.london/member-support/about-be-richmond</a> . Note that BIDS are funded by a mandatory levy on eligible businesses after a successful ballot in which businesses vote; the maximum period for the levy is 5 years, and to continue their activities a new ballot must be held. The preparation of the Local Plan and its implementation is the statutory responsibility of the Council in its role as local planning authority, subject to full consultation and independent Examination in line with statutory requirements. It is not considered that any amendments to the policy are required.
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<p>589</p>	<p>Peter Willan and Paul Velluet, Old Deer Park Working Group</p>	<p>General comment in relation to Old Deer Park</p>	<p>The Old Deer Park Working Group (the Group) comprises representatives of The Richmond Society, The Kew Society, The Friends of Richmond Green, The Friends of Old Deer Park and The St Margaret’s Estate Residents Association. This submission represents the joint response from the Group.</p> <p>The Group was formed in 2012 in recognition of the particular ecological, historical and recreational importance of the Old Deer Park and has since then worked for encouraging and securing the preparation of a coherent strategy for the effective conservation, development and management of the Park. In June, 2012, the Group published its report: The Old Deer Park, Richmond - Re-connecting the Town to its local park - Realising an under-recognised parkland asset – A framework for conservation and enhancement. Since then, it has made a number of submissions to the Council on related issues. In this connection and importantly, the Group worked collaboratively with the Council and its consultants on the preparation of the Old Deer Park Supplementary Planning Document (as published in March, 2018). The Group has also worked, and continues to work, collaboratively with the Council on the planning and implementation of projects for the enhancement of the Park, including the recently completed, award-winning scheme for improvements at and adjacent to the Park Lane entrance to the Old Deer Park Car-park. The Group is currently working with the Council to link the Old Deer Park car park with the river Thames along the area between the A316 road and the railway. It is working with the Council on tree planting and with Thames Landscape Strategy in rewilding the ODP section of Thames Arcadia.</p> <p>Richmond Town. We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Prospect of Richmond on Richmond Town to be considered alongside this response from the Old Deer Park Working Group on the Old Deer Park.</p>	<p>It is not considered that the Old Deer Park warrants its own character area. The borough-wide study undertaken by Arup as part of the Urban Design Study 2021 is necessarily at a broad scale. A finer grain of detail would be reflected within a more detailed character assessment. It is therefore not considered that any amendments to the existing character areas and boundaries are necessary.</p>
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596	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site allocation 24: Richmond Station, Richmond	<p>Both the title and the draft text of this Site Allocation need substantial amendment.</p> <p>The title should refer specifically not only to the Station, but also to the post-War, multi-storey NCP car-park to the south of the Station, the post-War parade of single-storey shops fronting The Quadrant (at nos. 27.B to 27.G) and the post-War office-block fronting Drummond's Place to the south and south-west of the Station, to the post-War parade of shops fronting Kew Road (at nos. 2 to 8 consec.) and the offices above (Westminster House) to the north of the Station, and the surface-level car-park to the north of the Station. A clear distinction needs to be made between proposals directly affecting the Station (together with the tracks and present day-lit, open-air platforms) and those affecting the other buildings and space referred to above. Whilst such proposals need to be coherent, they need to have regard to the substantially different considerations that apply to the present, very fine, locally listed Southern Railway Station complex (and not merely to its front façade to Kew Road and the upper booking-hall), completed in 1937, which is clearly worthy of statutory listing, together with the very fine 19th century platform-canopies serving platforms 4 and 5 and 6 and 7. Given the particular heritage significance of the Station complex - as distinct from the lack of heritage significance of the other buildings and space around the Station (the multi-storey car-park to the south of the Station, the parade of single-storey shops and the office-block fronting The Quadrant and Drummond's Place to the south and south-west of the station, the parade of shops and the offices above fronting Kew Road to the north of the Station, and the surface-level car-park to the north of the Station), there is clearly no scope whatever for the redevelopment of the existing Station complex - or for decking-over the tracks and the present day-lit, open-air platforms.</p> <p>However, this is not to suggest that there is no scope to enhance the existing Station complex - principally by carefully reinstating and restoring its original and very distinctive architectural interest and integrity, which has long remained a desirable objective, involving the removal of a series of damaging alterations carried out over recent years. Importantly, too, any proposed decking-over of the existing platforms and tracks and the resulting loss of daylighting and natural ventilation for the travelling public would not only have a massive and damaging impact on the amenity presently enjoyed by the public using the Station, but would also be wholly inconsistent with current national, London-wide and local sustainability interests. Most importantly, any significant increase in retail, leisure and/or entertainment uses on the site is most likely to harm damage the viability and vitality of the existing and long-established retail, leisure and entertainment in the heart of the Town to the south by drawing people away from The Quadrant, George Street, Sheen Road, The Square, Duke Street, King Street, Red Lion Street, Hill Street and Bridge Street. Similarly, any significant increase in retail, leisure and/or entertainment uses on the site is likely to necessitate a significant level of vehicular servicing that could only be provided via The Quadrant or Kew Road.</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the suggested suitability of the Station site and its immediate setting as 'a tall building zone (7-8 storeys)... with the opportunity for a landmark building' is wholly unacceptable, unrealistic and needs to be omitted altogether.</p> <p>Importantly, there is a clear need to fundamentally review and revise the current Development Brief for the Station site which dates back to March, 2002.</p>
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			<p>The Site Allocation comprises Richmond Station, the railway tracks to the rear, Gateway House and the multi-storey car park to the south, and Westminster House and open car park to the north. No changes to the wording are therefore required in this regard.</p> <p>See response to comment 595 with regards the heritage status of the station and the aspects of the site which are considered to most positively contribute to its designation and setting. The text as proposed would not preclude a development from coming forward which does not include the station, and vice versa. It is therefore not considered that any amendments to the wording are required.</p> <p>With regards the impact of a retail offer on site, commercial/retail uses are considered appropriate given the town centre location and an impact assessment on existing shopping centres would not be required by policy. There is an existing officer on site and a re-provision and enhancement of this is considered appropriate for a transport hub. It is considered that this would be complementary to, rather than detrimental to, existing shopping areas nearby, particularly given the Site Allocation recognition that the site acts as a gateway to the Richmond area.</p> <p>See response to comment 594 with regards the appropriateness of a tall building zone.</p> <p>Support for a revised development brief for the site is noted.</p>	<p>See response to comment 594 with regards the appropriateness of a tall building zone.</p>
-	Peter Willan and Paul Velluet, Old Deer Park Working Group		[See comment 1035 in respect of Policy 45 and high rise development which refer to Richmond Station]	See response to comment 594 with regards the appropriateness of a tall building zone.

597	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 25. Former House of Fraser, 16, Paved Court, 20, King Street, 4 to 8 and 10, Paved Court and 75-81, George Street, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any development of the site to provide for the enhancement of the external elevations of the existing 1960s building and the complete removal of the existing plant-enclosures at roof level in order to enhance views of the building from The Green and Hill Street, particularly in relation to the setting of the grade II* listed properties in Old Palace Terrace on Richmond Green, and that any extension or extensions to the existing building should rise no higher than the existing building (i.e. above four storeys), or that any replacement development of the site should rise no higher than that of the existing building .</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F1 Central Richmond and Richmond Green Conservation Area Statements</p>	<p>The former House of Fraser building itself is not a heritage asset, though the Site Allocation makes clear that any development proposal must be of the highest quality in character, respond positively to the Conservation Areas and protect and where possible enhance on-site Listed Buildings and BTMs, as well as nearby heritage assets. Thus any future planning application would to have regard to heights, elevational design and roof treatments as part of the demonstration of compliance with the above. To list these specific requirements is considered to be too prescriptive for the purposes of a Site Allocation, whose existing wording would already allow for assessment of these matters. Thus no changes to the wording are recommended.</p>
600	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 26 - Richmond Telephone Exchange, Spring Terrace, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing building should rise no higher than the three-storey part of the existing building, or that any replacement development of the site should rise no higher than that of the three-storey part of the existing building.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F1 Sheen Road Conservation Area Statement</p>	<p>See response to comment 599 with regards to heights.</p>
603	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 27. The American University, Queen's Road, Richmond	<p>The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing buildings on the site should rise no higher than any of the existing buildings on the site, or that any replacement or additional buildings on the site should rise no higher than any of the existing buildings on the site.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F2 Richmond Hill Conservation Area Statement</p>	<p>The Site Allocation makes clear that any development proposal must protect and where possible enhance the heritage assets on site and the Conservation, as well as nearby heritage assets, having regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance set out in the Urban Design Study and Village Planning Guidance. 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. The wording of the Site Allocation is therefore considered to be appropriate and no amendments are recommended.</p>



609	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 28 - Homebase, Manor Road, North Sheen	<p>(N.b. Not East Sheen)</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text of this Site Allocation needs to be amended by the deletion of the statement: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones', and the statement '...however the Urban Design Study 2021 recommends the appropriate heights for the zone are up to 8 storeys to respect the small scale of the surrounding area'. The draft text needs to be further amended to include specific reference to the need for any new development across the site to rise no higher than four storeys in order to relate the predominantly two-storey scale of the nearby residential areas to the north, north-west, west, south-west, south and east of the site, and to the similarly scaled properties within the nearby Sheendale Road and Sheen Road Conservation Areas'.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F3</p>	<p>See response to comment 594 regarding the methodology underpinning the Urban Design Study.</p> <p>Part of the site is identified within the UDS as having capacity for buildings of 7-8 storeys, illustrated on the heat maps on p.256 and p.328. The heat maps show the tallest buildings located in the centre of the site and reducing in height, reflected in the mid-rise zone which provides a transition to the smaller scale of the surrounding area.</p> <p>Additional wording to make specific reference within Appendix A to 2-storey prevailing heights to the N, NW, W, SW and SE and more specific separate references to the Homebase site versus the Sainsburys site has been amended in the updated Urban Design Study. However, no changes to the Site Allocation itself are recommended.</p>
616	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Site Allocation 29 - Sainsbury's, Lower Richmond Road and Manor Road, North Sheen	<p>Site Allocation 29 - Sainsbury's, Lower Richmond Road and Manor Road, North Sheen</p> <p>Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text needs to be amended by the deletion of the sentence: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones'.</p> <p>Supporting document/evidence: Urban Design Study December 2021. Character Area F3</p>	<p>See response to comment 594 regarding the methodology underpinning the Urban Design Study. The site is assessed as having capacity for buildings up to 7-8 storeys in part of the site, stepping down around the edges of the site to a mid-rise zone with maximum 5-6 storeys. No amendments to the Site Allocation are required.</p>

618	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Kew	<p>Based on Section 3 – Character Areas in Arup’s 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area ‘G1 – Kew Gardens and Riverside’ under the overall heading ‘G –Kew’). Like Richmond Park, the Old Deer Park should be covered by its own Character Area as ‘F4 – The Old Deer Park’, under the overall heading of ‘F – Richmond &amp; Richmond Hill (sic)’. On this basis, other sections of Arup’s Urban Design Study and to the Draft Local Plan need to be adjusted accordingly.</p> <p>Indeed, more fundamentally, the proposed structure of ‘Character Areas’ relating to Richmond, Kew and North Sheen as set out in Section 3 et seq. in Arup’s Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. They should surely be based for the most part on the present conservation areas.</p>	<p>The Old Deer Park is grouped into the character area G1 ‘Kew Gardens and Riverside’ because it is similar in character to the open spaces along this stretch of the Thames with regards to its green space, openness and its location next to the river. It is also part of the Kew Registered Park and Garden.</p> <p>The character areas and boundaries for the Urban Design Study (UDS) 2021 were subject to public consultation in May to June 2021. The method for defining the boundaries is set out in the methodology of the UDS pp.351- 353. This explains that, alongside field work, the following sources of information was used to define the boundaries included:</p> <ul style="list-style-type: none"> <li>-the Village Planning Guidance SPDs</li> <li>-Ward boundaries</li> <li>-existing town centres and areas of regeneration</li> <li>-conservation areas.</li> </ul> <p>Wherever possible, the UDS has followed conservation area boundaries and in particular, aimed not to split conservation areas. In some cases, conservation areas have been grouped because they are at too fine a grain for the scope of the study. The existing boundaries of the Village Planning Guidance were also used wherever possible, though areas were combined to achieve a more usable scale for the scope and purposes of this borough-wide study.</p> <p>The Old Deer Park is written about separately in the character area profile on p.170 and it is not considered that it warrants a separate character area profile.</p> <p>With regards to the other boundaries within the Richmond, North Sheen and Kew place, a detailed description of how these have been defined is provided below.</p> <p>Richmond Town Centre and Riverside: The boundary aims to incorporate the town centre character and uses and the Richmond part of the Riverside. Southern edge follows Village Planning SPD Area 13 along the river to Twickenham Bridge where it then follows the bridge as a logical feature and perceptual ‘end’ of Richmond town, before following the Village Planning SPD Area 13 and 14 and Conservation Area boundary with Old Deer Park. To the north west it follows Village Planning</p>
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619	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Place-based Strategy for Kew (in relation to Old Deer Park)	We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Old Deer Park Working Group on the Old Deer Park to be considered alongside this response from the Prospect of Richmond on Richmond Town.	See response to Comment 618 regarding the character area boundaries and Old Deer Park.  Comments noted.
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Peter Willan and Paul Velluet, Old Deer Park Working Group

Place-based Strategy for Kew (in relation to Old Deer Park)

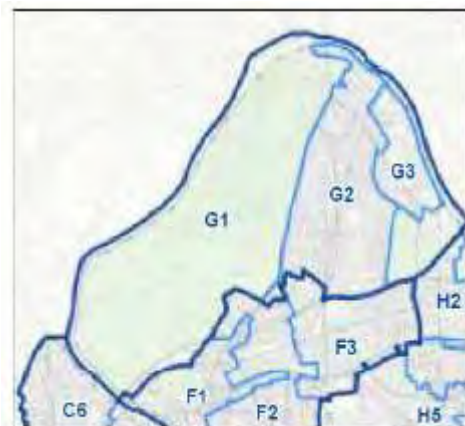
Place Definitions. Based on Section 3 – Character Areas in Arup’s 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area ‘G1 – Kew Gardens and Riverside’ under the overall heading ‘G –Kew’. Like Richmond Park, the Old Deer Park should be covered by its own Character Area as ‘F4 – The Old Deer Park’, under the overall heading of ‘F – Richmond & Richmond Hill (sic)’. On this basis, other sections of Arup’s Urban Design Study and to the Draft Local Plan need to be adjusted accordingly.

Indeed, more fundamentally, the proposed structure of ‘Character Areas’ as set out in Section 3 et seq. in Arup’s Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. They should surely be based for the most part on the present conservation areas and in this case the Old Deer Park Conservation Area.

Confusingly, the extant ‘Richmond & Richmond Hill Village Plan’ (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD.

We have extracted the Character Area Map from Arup’s Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.

See response to Comment 618 regarding the character area boundaries.



Kew Character Areas (G1-G3, F1-F3, H1-H5, C6) Urban Design Study Dec 2021

- Conservation Area 1: Royal Frog
- Conservation Area 2: The People's Temple
- Conservation Area 3: North of Lower Hill Road
- Conservation Area 4: South of Lower Hill Road
- Conservation Area 5: Richmond Hill
- Conservation Area 6: Old Deer Park
- Conservation Area 7: Riverside Lower Hill Upper Hill Road
- Conservation Area 8: Royal Frog North Hill
- Conservation Area 9: Queen's Road Estate
- Conservation Area 10: Queen's Road (east side)
- Conservation Area 11: Richmond Hill
- Conservation Area 12: Richmond Hill
- Conservation Area 13: Richmond Hill
- Conservation Area 14: Richmond Hill
- Conservation Area 15: Richmond Hill
- Conservation Area 16: Richmond Hill
- Conservation Area 17: Richmond Hill
- Conservation Area 18: Old Deer Park



Conservation Areas Richmond & Richmond Hill Village Plan

634	Peter Willan and Paul Velluet, Old Deer Park Working Group	Site Allocation 32: Pools on the Park and surroundings, Old Deer Park, Richmond	<p>The fourth bullet-point in the draft text needs to be amended to refer to the fact that at present the Statement of Significance is only in an incomplete draft form and needs to be amended before formal adoption in order to take full account of the particular special interest and significance of the listed pools complex and its landscaped setting. (In this connection, the Old Deer Park Working Group has been pressing the Council to undertake such amendment repeatedly since March, 2018. The text also needs to take account of the repeated requests by the local community over the last forty years for the Pools complex and its surrounding landscaped setting to be designated as Metropolitan Open Land, like the parkland which surrounds them).</p> <p>Supporting document/evidence:  Urban Design Study December 2021 (Character Area G1)  Old Deer Park Conservation Area Statement  Old Deer Park: The Crown Estate Landscape Strategy 1999  Old Deer Park Supplementary Planning Document 2018 Draft Statement of Significance  Old Deer Park: The Crown Estate Landscape Strategy 1999  Old Deer Park Supplementary Planning Document 2018</p>	<p>It has been clarified on the Council's website in May 2022 that the Statement of Significance: Richmond Public Baths, Old Deer Park, Richmond September 2017 a draft version. It remains appropriate that the Site Allocation refers to this document. The special interest and significance of the site and its surroundings is well recorded in other documents too, including the Old Deer Park SPD February 2018, CA57 Old Deer Park Conservation Area appraisal, and Richmond and Richmond Hill Village Planning Guidance June 217. These are all identified in the Site Allocation. The text also makes specific reference to the importance that any development proposal is considered within the context of the designations of the site and surrounding area. It is therefore considered that the current wording of the text is sufficient.</p> <p>Pools on the Park is a developed parcel of land which also includes a sizable amount of hardstanding. It is not considered that the site would score sufficiently highly against the 4 criteria used as part of the Open Land Review 2021 intended to inform the new Local Plan and consequently there are no plans by the Council to extend the surrounding MOL designation to include the site.</p>
638	Peter Willan and Paul Velluet, Old Deer Park Working Group	Site Allocation 33: Richmond Athletic Association Ground, Old Deer Park, Richmond	<p>No change proposed.</p> <p>Supporting document/evidence:  Urban Design Study December 2021 (Character Area G1)  Old Deer Park Conservation Area Statement  Old Deer Park: The Crown Estate Landscape Strategy 1999  Old Deer Park Supplementary Planning Document 2018</p>	Noted.
673	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General - Policies	Section 15 in the un-headed list of contents – titled 'Policies' - doesn't contain anything other than one photograph. Instead, the polices are set out in Sections 4 and 16 to 26 inclusive. Needs remedying.	-
674	Peter Willan and Paul Velluet, Old Deer Park Working Group	General - Policies	Section 15 in the un-headed list of contents – titled 'Policies' - doesn't contain anything other than one photograph. Instead, the polices are set out in Sections 4 and 16 to 26 inclusive. Needs remedying.	-



Off

678	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Climate Change Emergency.	We welcome the increased emphasis given to climate change and pollution.	Support noted.
679	Peter Willan and Paul Velluet, Old Deer Park Working Group	Climate Change Emergency.	We welcome the increased emphasis given to climate change and pollution.	Support noted.
794	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to culture)	We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council's Culture Richmond 2021-2031 Plan.	Noted.
795	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to culture)	We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council's Culture Richmond 2021-2031 Plan.	Noted.

805

Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)

Policy 18. Development in centres

We refer to Arup's Urban Design Study, December 2016; Lichfields Richmond-upon-Thames Retail and Leisure Needs Study Phase 1 Update, July 2021; Icen's Richmond Local Housing Market Assessment, December 2021; and Santec's Employment Land and Premises Needs Assessment, December 2021- all provided as supplementary evidence by the Council.

We have sought to pull together the estimated demand and availability of floor space for all uses in Richmond Town from 2021 to 2039.

**Richmond Zone 1 Retail, Non-retail services and Leisure Floor space**

Lichfields' Report estimates population as shown in Figure 1 and retail, non-retail services and leisure over/under supply in Figure 2. Richmond borough is divided by Lichfields into 7 zones: Richmond, Twickenham, Whitton, Teddington, Hampton, Kew/North Richmond, Barnes/E Sheen. The focus here is on Zone 1 for which a map is shown in Figure 3. The population for the borough is estimated to rise by only 2.9% from 2021 to 2039 and to decline slightly in Richmond Zone 1. The over/under supply of space is calculated by estimating the expenditure per person and then the total available expenditure based on the population. Expenditure from existing facilities is estimated and subtracted from the available expenditure to establish the incremental expenditure from new facilities. This increment is then converted into net floor space by turnover density factors and finally into gross floor space over/under supply. We question why Table 11 page 74 of the Lichfields' Report is headed Gross floor space - a step of first calculating Net floor space seems to be missing.

It is estimated that in 2039 there will be an under supply of retail and non-retail services floor pace of 1,457 m2 and an over supply in preceding years. There is an estimated under supply of 7,000 m2 for leisure in 2039 and 4,000 m2 in 2034 but no information for earlier years. Non-retail services include hairdressers, banks, restaurants, cafes and hot food takeaways. Leisure includes cinemas and cultural activities. Home/internet turnover is taken into account.

Table 1	Population				
	2021	2024	2029	2034	2039
Population Richmond Zone 1 see map attached	23,031	22,440	22,056	22,170	22,536
Population Richmond Borough	199,603	198,220	200,146	201,548	205,200

Figure 1 Source Lichfields report on Retail and Leisure

Table 3.1a	Over(-)/under(+) Supply Cumulative Gross Floorspace					
	Total 2017	2021	2024	2029	2034	2039
	m2	m2	m2	m2	m2	m2
Retail Convenience	7,950		-246	-163	55	388
Retail Comparison	31,727		-1,584	-2,075	-1,895	-1,342
Food/beverage	4,640		-3,266	-217	891	2,411
Non-retail Services						
<b>Total</b>	<b>44,317</b>		<b>-5,106</b>	<b>-2,455</b>	<b>-949</b>	<b>1,457</b>
Leisure					4,000	7,000

Figure 2 Source Lichfields report on Retail and Leisure

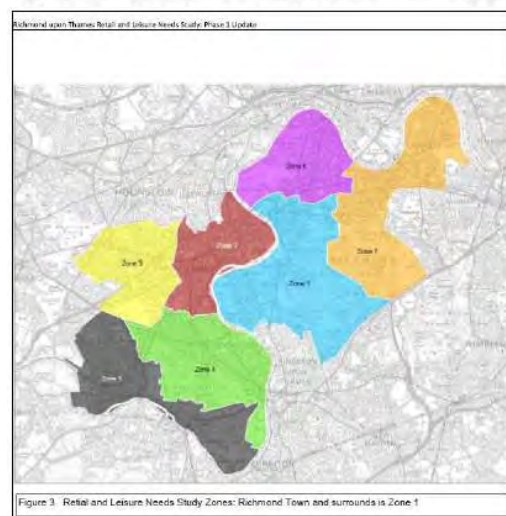


Figure 3 Retail and Leisure Needs Study Zones: Richmond Town and surrounds is Zone 1

				<p>The Evidence Base seeks to forecast the need for land uses to ensure that needs are met as required by the NPPF. The research has been produced separately, reflecting industry-standard approaches, but in a co-ordinated way, with liaison between consultants.</p> <p>The Council's Town Centre Land Use Survey records ground floor occupiers of premises in the borough's centres, covering approximately 2,500 premises. Despite the pandemic, data have continued to be collected and analysed with surveys taking place in 2019, 2020, 2021 and 2022.</p> <p>The RLNS has been purposefully split into two phases to allow for the more detailed assessment, including the qualitative element, to be produced in 2022 when it was expected that the impact of the pandemic would have lessened from the previous year, in order to produce as accurate an assessment as possible, bearing in mind timetabling commitments for the Local Plan.</p> <p>This approach, coupled with the updating of key elements of the evidence base including the Employment Land and Premises Needs Assessment and the Urban Design Study provide an up-to-date basis which supports the Regulation 19 Local Plan.</p>
807	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment in relation to planning uses	We welcome the recognition of the implications, including the risks, of the new combined business land Use Class E and changes to permitted development rights. We comment later on this topic and the potential consequences for balancing the uses of Richmond Town and its character.	Noted.

<p>812</p>	<p>Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)</p>	<p>General comment in relation to Evening and Night Time Economy.</p>	<p>We note support throughout the Local Plan to Richmond town centre Night Time economy and in some cases extending to the Riverside and Richmond Green. We welcome the caveat in the Local Plan as stated in Policy 19, Managing Impacts and elsewhere, that there is a combined and cumulative impact that needs to be controlled and that amenity of residents needs to be protected. It may be semantics but we recommend a greater distinction between the evening and night time economies with the later applying to the late evening early hours of the morning. We are opposed to supporting a Night time economy in Richmond Town and on and around Richmond Green due to resident harm and the Riverside due to resident harm including those on the Twickenham riverside.</p> <p>Richmond town and surrounding areas have one of the highest ratios of pubs and bars to residents in the whole of London and moreover confined to a small area by the Thames and railway line. Public transport is reduced by midnight and is very limited shortly thereafter. Police and cleansing resources are not available at night time. We support the evening economy, and increasing family use, but the town needs to wind down before midnight so residents can get their eight hours sleep as advised by the WHO, difficult as this is with Heathrow night flights starting at 4:30am.</p> <p>We note Policy 19 does enable the Council to limit closing hours of premises. But we urge the Local Plan to go further. Night time economy infers activity past 11pm into the early hours of the morning and we would urge the Local Plan to explicitly discourage this in Richmond Town, but of course recognising there may be exceptions. Disturbance of residents arises to those living in the heart of the town as well as on and around Richmond Green and along the Riverside which also includes resident disturbance on the Twickenham riverside. We urge better distinction between the evening and night economies.</p>	<p>Richmond town centre is recognised in the London Plan as having a classification NT 2 – an area of regional/sub-regional importance in terms of the night-time economy.</p> <p>It is considered that the policies proposed, particularly Policy 19, are sufficiently robust to ensure that impact on residential amenity is taken fully into account. The preferred approach is to consider each proposal on its merits and include consideration of cumulative impact and whether the proposal would result in the over-concentration of similar uses contrary to policies 18 &amp; 19.</p> <p>The Council’s Licensing policy may also be taken into account, including the Cumulative Impact Policy applying to large parts of the centre. Hours of operation can be restricted where reasonable and appropriate under both licensing and planning regimes.</p>
<p>865</p>	<p>Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)</p>	<p>Policy 28. Local character and design quality (Strategic Policy)</p>	<p>The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework .</p> <p>The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.</p>	<p>The purpose of Policy 28 is to encompass all development within the Borough, with special attention paid to the 'places' and 'character areas' identified in the Urban Design Study. Conservation Areas are included in this umbrella policy/by default but have more specific expectations outside of the scope of this policy, which are outlined in Policy 29 – Designated Heritage Assets.</p> <p>The purpose of the Urban Design Study is outlined in detail in Policy 2 (Spatial Strategy: Managing change in the borough) and in sections 5 and 6 of the Local Plan.</p> <p>See also response to comment 586.</p>

Off

866	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 28. Local character and design quality (Strategic Policy)	The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework . The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.	See response to comment 865.
878	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 29. Designated heritage assets	No change proposed.	Comment noted.
879	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 29. Designated heritage assets	No change proposed.	Comment noted.
885	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 30. Non-designated heritage assets	No change proposed.	Comment noted.
886	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 30. Non-designated heritage assets	No change proposed.	Comment noted.
927	Peter Willan and Paul Velluet, Old Deer Park Working Group	MOL Review – naming of Parcel 28 and Parcel 31	The Arup MOL Review Annex Report; a Parcel 28 page 92 is titled Little Green. It should be Richmond Green, b Parcel 31 page 101 is titled Thames Old Deer Park. It is not part of the Old Deer Park.	The Open Land Review has been updated in 2023 to incorporate these suggestions for the site assessments.



929	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 35 – Green Belt, Metropolitan Open Land and Local Green Space	<p>We respond here on MOL status for Richmond Green, Policy 35, which is significantly undervalued by Arup's MOL Review Annex Report, and on Riverside North of Richmond Bridge and Riverside South of Richmond Bridge.</p> <p>Under the heading 'Proposed changes to the Policies Map' the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.</p> <p>(In Arup's 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 'Parcel' (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens 'Parcel' – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside 'Parcel' – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that 'the eastern third of the parcel, is developed and does not meet the MOL criteria' and that its MOL status should be considered further. The parcel is certainly NOT 'largely inaccessible to people' as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.</p> <p>In relation to the The Green and Little Green, Richmond 'Parcel' – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of The Buildings of England – London 2: South as 'one of the most beautiful urban greens surviving anywhere in England', Richmond Green possesses not only considerable architectural, historic and landscape interest and significance, but importantly, constitutes a</p>	<p>The Council, through the Arup Open Land Review (2021) only assessed existing MOL based on mapping from 2015. It is not the Council's intention to identify new parcels of land for MOL for the new Local Plan.</p> <p>Arup, in their Open Land Review 2021, separated parcel 26 from parcel 24 using accepted methodology for undertaking MOL reviews in line with national Green Belt policy, which states boundaries are to be defined 'using physical features that are readily recognisable and likely to be permanent' (paragraph 143, NPPF), in this case the A316. This eastern part of the parcel is still designated as a Registered Park and Garden, however due to a lack of 'openness' it is considered that it cannot be recommended to meet MOL purposes on this feature alone. The Council do not propose to change the MOL designation of this site in line with the Reg 18 plan.</p> <p>For criterion 4, the assessment considers whether the parcel forms part of a strategic corridor, node or link in the network of green infrastructure. A large amount of the parcel is unfenced lawn, which could be used by people, but as it has no formal access routes (apart from a small section of the Thames Path), it was considered to provide limited access links for people. Whilst the eastern third of the parcel is publicly accessible, due to its developed nature (a public car park), it was not considered to contribute to the green infrastructure network. The parcels contribution to the River Thames path was considered, scoring moderate (3) overall, despite most of the parcel scoring more weakly.</p>
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930	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 35. Green Belt, Metropolitan Open Land and Local Green Space	<p>We respond here on MOL status and boundary anomalies and seek to remove any question of an important part of the Old Deer Park ceasing to being designated as MOL, as raised in Arup's MOL Review Annex Report. We comment further on Policy 35 Green Belt, Metropolitan Open Land and Local Green Space.</p> <p>Under the heading 'Proposed changes to the Policies Map' the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under 'Policies Map for the Local Plan Review, 2015-2018' in the part of the Council's current Planning Policy web-site dealing with the current 'Adopted Local Plan' (adopted in July, 2018), it is clearly stated that 'The Council's Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020'. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.</p> <p>(In Arup's 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 'Parcel' (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens 'Parcel' – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside 'Parcel' – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that 'the eastern third of the parcel, is developed and does not meet the MOL criteria' and that its MOL status should be considered further. The parcel is certainly NOT 'largely inaccessible to people' as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.</p> <p>In relation to the The Green and Little Green, Richmond 'Parcel' – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of The Buildings of England – London 2: South as 'one of</p>	<ul style="list-style-type: none"> <li>• The Council, through the Arup Open Land Review (2021) only assessed existing MOL based on mapping from 2015. It is not the Council's intention to identify new parcels of land for MOL for the new Local Plan.</li> <li>• Arup, in their Open Land Review 2021, separated parcel 26 from parcel 24 using accepted methodology for undertaking MOL reviews in line with national Green Belt policy, which states boundaries are to be defined 'using physical features that are readily recognisable and likely to be permanent' (paragraph 143, NPPF), in this case the A316. This eastern part of the parcel is still designated as a Registered Park and Garden, however due to a lack of 'openness' it is considered that it cannot be recommended to meet MOL purposes on this feature alone. The Council do not propose to change the MOL designation of this site in line with the Reg 18 plan.</li> <li>• For criterion 4, the assessment considers whether the parcel forms part of a strategic corridor, node or link in the network of green infrastructure. A large amount of the parcel is unfenced lawn, which could be used by people, but as it has no formal access routes (apart from a small section of the Thames Path), it was considered to provide limited access links for people. Whilst the eastern third of the parcel is publicly accessible, due to its developed nature (a public car park), it was not considered to contribute to the green infrastructure network. The parcel's contribution to the River Thames path was considered, scoring moderate (3) overall, despite most of the parcel scoring more weakly.</li> <li>• The Council have amended criterion 4 to reflect the points set out above.</li> </ul>
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Off

952	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 37. Public open space, play, sport and recreation	No change proposed.	Noted.
954	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to culture)	We understand the Council expect to undertake a further Sports Review in 2022.	The Council has developed an update to the Richmond Playing Pitch Strategy.
955	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 37. Public open space, play, sport and recreation	No change proposed.	Noted.
1013	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 43. Floodlighting and other external artificial lighting	No change proposed.	Noted.
1014	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 43. Floodlighting and other external artificial lighting	No change proposed.	Noted.
1018	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 44. Design Process	The wording of Part B of the Policy needs to be amended to omit reference to 'the design guidance for the relevant character area as specified within the Urban Design Study 2021' insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in 'F. Richmond and Richmond Hill' (on page 255).	All development would be expected to have regard to the relevant character area set out in the Urban Design Study 2021, including proposals in Tall and Mid-Rise Building Zones and those within the Richmond and Richmond Hill character area. It is not considered that any changes to the wording are therefore considered to be necessary.
1019	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 44. Design Process	The wording of Part B of the Policy needs to be amended to omit reference to 'the design guidance for the relevant character area as specified within the Urban Design Study 2021' insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in 'F. Richmond and Richmond Hill' (on page 255).	See response to Comment no. 1018.

1032	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	Policy 45.Tall and Mid-Rise Building Zones	<p>The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a 'Tall' or 'Mid-rise' buildings Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of 'Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading 'F. Richmond and Richmond Hill' relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). * In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.</p> <p>Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that 'Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land' has no relevance at all to the existing urban character of Richmond, its sustainable development, its enhancement or the provision of 'affordable housing' for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.</p>	<p>See response to comment 1030 with regards the methodology underpinning the Urban Design Study, which is considered to be robust and sound.</p> <p><u>Richmond Station</u></p> <ul style="list-style-type: none"> <li>-The Urban Design Study 2021 has identified the site as having capacity to accommodate buildings of up to 7-8 storeys. The text on p.255 highlights that the opportunities for the tallest heights are within parts of the zone, and that buildings should step down to the surroundings, as indicated by the heat map and surrounding mid-rise zone.</li> <li>-The character profile on p.158 notes that there is an underwhelming sense of arrival at the station.</li> <li>-The design guidance on p.297 states that main roads may be able to accommodate taller buildings if stepped back. It also recommends the sense of arrival and quality of the public realm at the station could be enhanced.</li> <li>-The strategy for the area is to conserve and enhance the identity of specific areas (notably around the station) and the functioning of the area as a town centre.</li> <li>-The assessment in Appendix A on p.325 provides a rationale for the appropriate heights identified. A scenario was tested on the site, which was developed in the context of providing active ground floor uses, respecting the height of the existing locally listed station building, setting the taller element back behind the primary frontage and noting there is potential for a new development to serve as a landmark gateway marking the arrival point in Richmond.</li> </ul> <p>The existing commercial building to the south of the station is 5 storeys (and 6 storeys to the east where the ground level drops).</p> <ul style="list-style-type: none"> <li>-A ZTV was produced to test the potential visibility of the scenario heights and a high level townscape, visual and heritage assessment was undertaken. The assessment concludes that there <i>'is potential for some additional height, but only where this is substantially set back within the plot and away from the road frontage'</i>.</li> <li>-The assessment notes the tall building zone is limited by the many sensitivities including the locally listed station</li> </ul>
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1033	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	General comment (in relation to high rise development)	We are deeply concerned at the support given for high rise development at the Richmond Station and comment on <b>Site Allocation 24 Richmond Station, 28 Homebase and 29 sainsbury's and Policy 45 Tall and mid-rise Building zones.</b> [See comments 596, 609, 616 and 1032]	See responses to comments 50594, 96, 609, 616 and 1032. No further amendments are required.
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1034	Peter Willan and Paul Velluet, Old Deer Park Working Group	General comment (in relation to high rise development)	We are concerned at the support given for high rise development at the Richmond Station and elsewhere given the potential for interrupting views and vistas that are so important to the Old Deer Park. We comment on Site Allocation 24 Richmond Station and Policy 45 Tall and mid-rise Building zones. [See comment 1035]	See response to comment 1032 with regards to Richmond Station. Figure 424 on p. 327 of the Urban Design Study 2021 provides an illustrative view from Vu.City illustrating the potential visibility from within Old Deer Park. Whilst the upper parts of an 8 storey building would be visible in a bare earth view, in reality it would be largely screened by trees and vegetation around the park. No amendments to the text are required.
1035	Peter Willan and Paul Velluet, Old Deer Park Working Group	Policy 45.Tall and Mid-Rise Building Zones	<p>The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a 'Tall' or 'Mid-rise' buildings Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of 'Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading 'F. Richmond and Richmond Hill' relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). * In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.</p> <p>Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that 'Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land' has no relevance at all to the existing urban character of Richmond, its sustainable development, its enhancement or the provision of 'affordable housing' for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.</p>	Please see responses to comments 1030 and 1032 regarding the Urban Design Study methodology, Richmond Station, North Sheen and tall buildings' impact on townscape. No amendments to the text are necessary.
-	Peter Willan, Paul Velluet and Laurence Bain on behalf of Prospect of Richmond (and supported by the Friends of Richmond Green)	High rise development	[See comment 1033 in respect of high rise development and comment 1032 in respect of Policy 45]	See response to comment 1032 with regards to Richmond Station. No amendments are required.

Off

-	Peter Willan and Paul Velluet, Old Deer Park Working Group	High rise development	[See comment 1035 in respect of Policy 45 and high rise development which refer to Richmond Station]	Please see responses to comments 1030 and 1032 regarding the Urban Design Study methodology, Richmond Station, North Sheen and tall buildings' impact on townscape. No amendments to the text are necessary.
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## **Draft Local Plan Pre-Publication Consultation**

**From 10 December 2021 to 31 January 2022**

### **RESPONSE FORM**

The Council is inviting comments on the first draft of the Local Plan.

The draft Local Plan sets out a 15-year strategic vision, objectives, place-based strategies and the overall spatial strategy for the borough as well as the planning policies that will guide future development in the borough. It looks ahead to 2039 and identifies where the main developments will take place, and how places within the borough will change, or be protected from change, over that period. In addition, the draft Local Plan sets out the site allocations that are considered to assist with the delivery of the vision and strategy of the Plan. This is of particular importance for ensuring there is sufficient land for employment, retail, housing and social infrastructure.

We would like to hear the views from our local communities, businesses and other key organisations on the draft Plan.

#### **How to respond**

Please read the consultation documents and other background information made available on the Local Plan website. To view the draft Local Plan and take part in the consultation, visit [https://www.richmond.gov.uk/draft\\_local\\_plan\\_pre\\_publication\\_version](https://www.richmond.gov.uk/draft_local_plan_pre_publication_version)

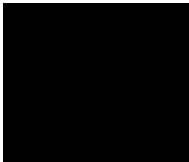



#### **You can respond on the consultation documents in the following ways:**

- Online response form through our **consultation portal** <https://richmond-consult.objective.co.uk/kse>
- Email to **LocalPlan@richmond.gov.uk** this response form (a PDF and Word version of the form can be found on the Council's website at [https://www.richmond.gov.uk/draft\\_local\\_plan\\_pre\\_publication\\_version](https://www.richmond.gov.uk/draft_local_plan_pre_publication_version)). In the form in 'Word' format you can type in your response and return it as an email attachment
- Post a hard copy of the form to Spatial Planning and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ.

All responses must be received by Monday **31 January 2022**.

#### **This form has three parts:**

- Part A – Personal details and about you
- Part B – Your general views
- Part B – Your detailed response

Part A: Personal Details		
	1. Personal Details *	2. Agent's Details (if applicable)
Title	Messrs	
First name		
Last name	Willan, Velluet and Bain	
Job title (where relevant)		
Organisation (where relevant)	Prospect of Richmond	
Address		
Postcode		
Telephone		
E-mail address		

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

### Part A: About You...

Prospect of Richmond is a group of local residents that have extensive knowledge and experience of living in or near Richmond Town and the surrounding area. Two of us have been past chairs of the Richmond Society and one a past chair of the Friends of Richmond Green and one of us chairs the Richmond Heathrow Campaign comprising the Richmond Society, Kew Society and the Friends of Richmond Green. While not part of this response we have extensive involvement with the adjacent Old Deer Park. Two are architects.

Individually and together, we have been involved with many planning, licensing, traffic, heritage, charity, cultural and other matters. We are dedicated to the preserving and improving the area for the benefit of residents and other stakeholders. Over many years we have engaged extensively with Richmond-upon-Thames Council and are keen to continue doing so.

<b>3. Please tell us about yourself or who you are responding on behalf of...( tick all which apply)</b>		
Do you live in the borough?	Yes X	No G
Do you work in the borough?	Yes G	No G
Do you run a business in the borough?	Yes G	No G
Are you a student in the borough?	Yes G	No G
Are you a visitor to the borough?	Yes G	No G

### Data protection

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

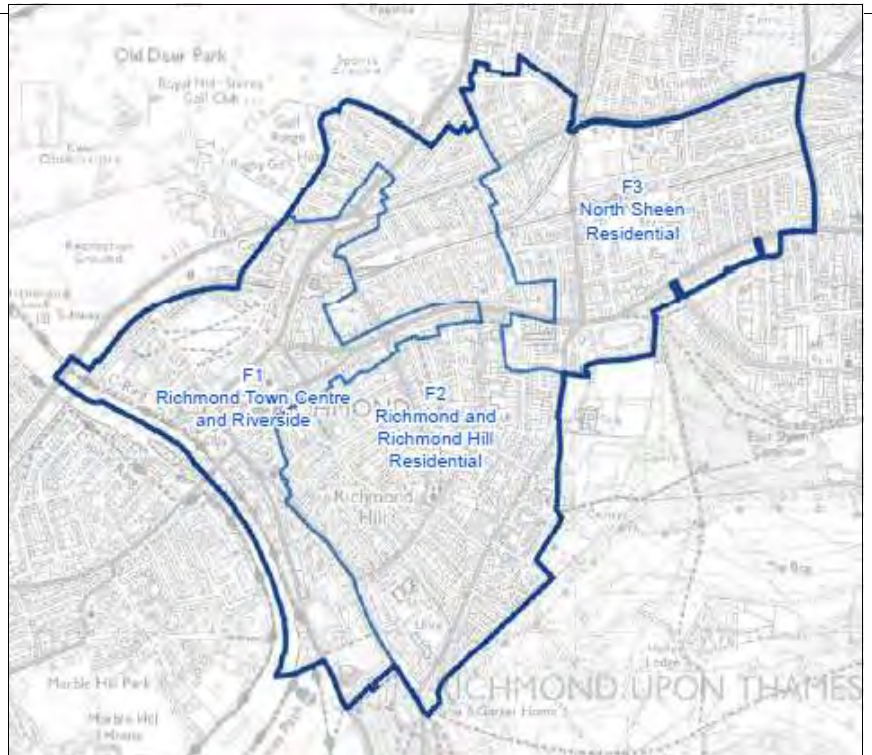
The Council's Privacy Notice is published on the webpage [www.richmond.gov.uk/data\\_protection](http://www.richmond.gov.uk/data_protection)

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

### Part B: Your General Views

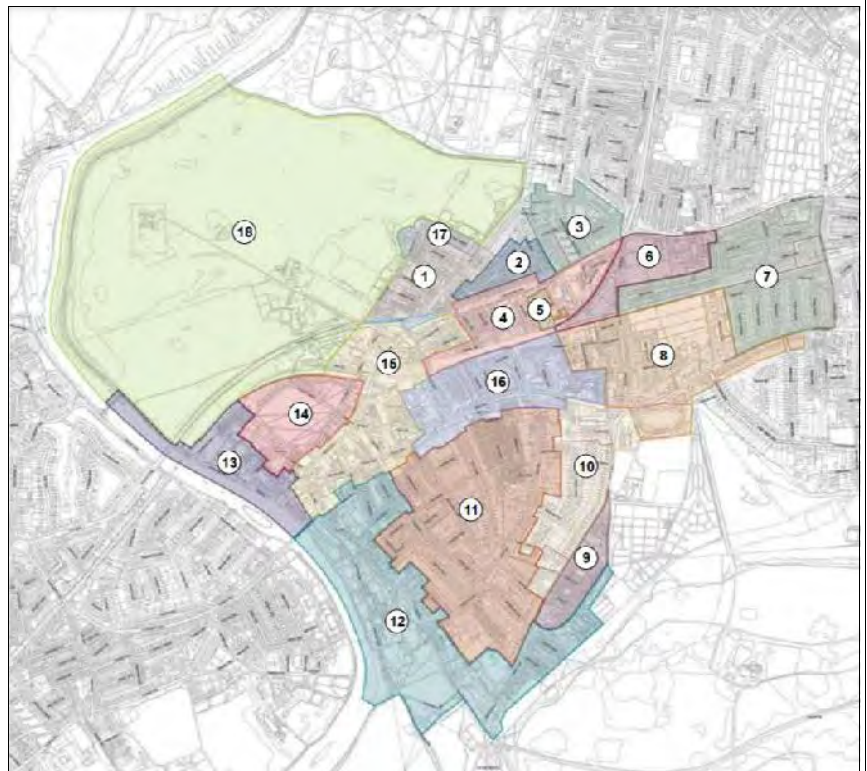
- Place Definitions.** We refer to Richmond Town as comprising the Conservation Areas for Richmond Town Centre, Richmond Green, Richmond Riverside and Richmond Hill. The use, character and value of the four components of Richmond are very different but it is this diversity, side by side in a relatively small area, that is so valuable. The whole is greater than the sum of the parts.
- Local Plan Section 11 heading is 'Place-based Strategy for Richmond & Richmond Hill'. The study area is defined as 'Richmond Town Centre and Riverside, and the residential and mixed use areas into Richmond Hill and North Sheen'. These are character areas F1, F2 and F3 in the Urban Design Study 2021'. 'Richmond Town Centre and Riverside' (F1) is described as including Richmond Green. We believe the four components of Richmond Town should be separately identified in line with the boundaries of the Conservation Areas for Central Richmond, Richmond Green, Richmond Riverside and Richmond Hill and that the character areas should match the Conservation Area boundaries.
- Confusingly, the extant 'Richmond & Richmond Hill Village Plan' (2016) comprises all four areas plus Richmond and Richmond Hill residential (F2), North Sheen Residential (F3) and the Old Deer Park which is included in the Local Plan as Placed Based Strategy for Kew and has its own Old Deer Park Conservation Area Statement and SPD. We note parts of the two Riverside Conservation Areas are on the Twickenham side of the river Thames whereas the Local Plan boundary appears to be the centre of the river.
- We have extracted the Character Area Map from Arup's Urban Design Study Dec 2021 and provided a Conservation Area Map so that members of the community reading our response can better understand the context.





Richmond & Richmond Hill. Urban design Study Dec 2021

- Conservation Area 1: Kew Foot Road
- Character Area 2: The Pagoda Triangle
- Character Area 3: North of Lower Mortlake Road
- Character Area 4: South of Lower Mortlake Road
- Conservation Area 5: Sheendale Road
- Character Area 6: Old Gas Works
- Character Area 7: Between Lower and Upper Richmond Road
- Character Area 8: Kings Farm Avenue and surrounds
- Character Area 9: Queen's Road Estate
- Character Area 10: Queen's Road (west side)
- Conservation Area 11: St Matthias
- Conservation Area 12: Richmond Hill
- Conservation Area 13: Richmond Riverside
- Conservation Area 14: Richmond Green
- Conservation Area 15: Central Richmond
- Conservation Area 16: Sheen Road
- Character Area 17: Old Deer Park Gardens
- Conservation Area 18: Old Deer Park



Conservation Areas Richmond & Richmond Hill Village Plan

5. Local Plan covers the entire Borough so the Title should be Richmond-upon-Thames Local Plan and not simple Richmond Local Plan. **Needs remedying.**
6. Despite the page-numbers given in what appears to be the list of contents – but is not headed as such – there is no pagination in the entire document. **Needs remedying.**
7. Section 15 in the un-headed list of contents – titled ‘Policies’ - doesn’t contain anything other than one photograph. Instead, the policies are set out in Sections 4 and 16 to 26 inclusive. **Needs remedying.**
8. The lists of page-numbers in the un-headed list of contents and the headed list of policies should be headed as such. **Needs remedying.**
9. In the un-headed list of contents Section 3 is titled ‘Place-based Strategy for Richmond & Richmond Hill’ whereas it should be titled as ‘Richmond Town Centre and Riverside, Richmond and Richmond Hill Residential and North Sheen Residential’ – assuming that one accepts the highly questionable concept and structure of ‘Character Areas (sic) as set out in Arup’s 432-page Urban Design Study. **Needs remedying.**
10. Neither Section 2 nor Section 15 appears to included any reference to a Policies Map. Referring to the note contained under ‘Policies Map for the Local Plan Review, 2015-2018’ in the part of the Council’s current Planning Policy web-site dealing with the current ‘Adopted Local Plan’ (adopted in July, 2018), it is clearly stated that ‘The Council’s Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020’. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. **The omission needs to be urgently remedied.**
11. Based on Section 3 – Character Areas in Arup’s 432-page Urban Design Study, The Old Deer Park is incorrectly grouped with the Royal Botanic Gardens, Kew in Character Area ‘G1 – Kew Gardens and Riverside’ under the overall heading ‘G –Kew’). Like Richmond Park, the Old Deer Park should be covered by its own Character Area as ‘F4 – The Old Deer Park’, under the overall heading of ‘F – Richmond & Richmond Hill (sic)’. On this basis, other sections of Arup’s Urban Design Study and to the Draft Local Plan **need to be adjusted accordingly.**
12. Indeed, more fundamentally, the proposed structure of ‘Character Areas’ relating to Richmond, Kew and North Sheen as set out in Section 3 et seq. in Arup’s Urban Design Study needs to be challenged. The proposed boundaries relate neither to the present Ward boundaries nor to the existing conservation area boundaries. **They should surely be based for the most part on the present conservation areas.**
13. So much in the Draft Local Plan derives from questionable analysis and questionable recommendations in Arup’s Urban Design Study and, in more limited part, this in Arup’s 156-page Metropolitan Open Land Review Annexe Report. **Indeed, all these need to firmly challenged.**
14. **Sustainable Growth.** We responded to the Direction of Travel Consultation in 2020, wherein we questioned the need and advisability of replacing the Local Plan 2018 so soon. One of the four

reasons then given by the Council was population growth but according to the Retail and Leisure Needs Study (2021), Richmond Borough population of 199,630 in 2021 is estimated to grow by only 2.8% to 205,200 in 2039. The estimate for Richmond Town and surrounding area (Zone 1) is for a decrease in population from 23,031 in 2021 to 22,536 in 2039. The absence of population growth feeds through into housing and into, retail, food/beverage and leisure uses and employment, housing, etc. in Richmond Town, so the estimates are important for the Local Plan. We comment on the Uses of Richmond Town in reference to **Policy 18**.

15. In view of the very limited estimated growth in population in Richmond Borough and a small decrease in Richmond Town and surrounding area (Zone 1) we believe it is important to emphasise “Improvement” as well as Growth. While population numbers may not grow there will be elements of the Local Plan where there is growth and elements where there is decline. Even without population growth, it is to be expected that there will be increasing prosperity and increasing disposable income and therefore growth in the uses of Richmond Town.
16. **Climate Change Emergency.** We welcome the increased emphasis given to climate change and pollution.
17. **Planning Uses.** We welcome the recognition of the implications, including the risks, of the new combined business land Use Class E and changes to permitted development rights. We comment later on this topic and the potential consequences for balancing the uses of Richmond Town and its character.
18. **Culture.** We support the attention given to the Cultural Policies and would like to see Richmond town centre play a significant role in the Council’s Culture Richmond 2021-2031 Plan.
19. **Evening and Night Time Economy.** We note support throughout the Local Plan to Richmond town centre Night Time economy and in some cases extending to the Riverside and Richmond Green. We welcome the caveat in the Local Plan as stated in **Policy 19, Managing Impacts** and elsewhere, that there is a combined and cumulative impact that needs to be controlled and that amenity of residents needs to be protected. It may be semantics but we recommend a distinction between the evening and night time economies with the later applying to the late evening early hours of the morning. We are opposed to supporting a Night time economy in Richmond Town and on and around Richmond Green due to resident harm and the Riverside due to resident harm including those on the Twickenham riverside.
20. **RBID.** We note the explicit reliance on the RBID and its Vision in the **Local Plan Section 11 Place-Based Strategy for Richmond and Richmond Hill** but we have not been able to find the Vision Report as evidence and are concerned that since the RBID is established by businesses alone and not residents there is likely to be a bias in favour of businesses. Also, the areas covered by the RBID are parts of Richmond Town Centre and not Richmond Green, for example where we wholly oppose commercial use, other than in the context of mixed use along Greenside. We are concerned that the democratic process may be at risk and while we are not saying this is intentional, we believe the matter needs to be resolved going forward. In so far as our response here is concerned, without the evidence we are not able to make a reasoned response on the RBID Vision included in the draft **Local Plan at Placed-based Strategy- Richmond and Richmond Hill**.

21. **High Rise development.** We are deeply concerned at the support given for high rise development at the Richmond Station and comment on **Site Allocation 24 Richmond Station, 28 Homebase and 29 sainsbury's and Policy 45 Tall and mid-rise Building zones.**
22. **Site Allocation.** We respond here on **Site Allocations 24, 25, 26, 27, 28 and 29** and raise a number of concerns.
23. **MOL.** We respond here on MOL status for Richmond Green, **Policy 35**, which is significantly undervalued by Arup's MOL Review Annex Report, and on Riverside North of Richmond Bridge and Riverside South of Richmond Bridge.
24. **Specific Policies.** We respond here to Policies **18, 19, 28, 29, 30, 35, 37, 43, 44 and 45.**
25. **Heathrow noise.** We propose Heathrow noise be given much more weight in the Local Plan, especially in response to the re- allocation of flight paths from Airspace Modernisation and the introduction of air taxis and drones. This is dealt with reference to the **Introduction paragraphs 2.44 and 2.45.**
26. **Old Deer Park.** We recommend that the Old Deer Park should be covered by its own Character Area but the park's access from Richmond Town and proximity encourage the consultation response from the Old Deer Park Working Group on the Old Deer Park to be considered alongside this response from the Prospect of Richmond on Richmond Town.

<b>4. Do you agree or disagree with the Strategic Vision? (section 3)</b>				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with the Strategic Vision but with a number of caveats referred to in this response.				
<b>5. Do you agree or disagree with the Strategic Objectives? (section 3)</b>				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with the Strategic Objectives but with a number of caveats referred to in this response.				
<b>6. Do you agree or disagree with Policy 1. Living Locally and the 20-minute neighbourhood? (section 4)</b>				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with Policy 1 and the 20-minute neighbourhood.				
<b>7. Do you agree or disagree with Policy 2. Spatial Strategy: Managing change in the borough? (section 4)</b>				
Strongly Agree G	Agree X	Neither Agree/Disagree G	Disagree G	Strongly Disagree G
Any comments: We agree broadly with Policy 2, Spatial Strategy: Managing Change in th borough.				
<b>8. Do you agree or disagree with the place-based strategies? (sections 6 to 14)</b>				
Strongly Agree G	Agree G	Neither Agree/Disagree G	Disagree X	Strongly Disagree
Any Comments: Our response here on the Place-based Strategy: Richmond Town and Richmond Hill and Policy 28 – Local character and design quality (Strategic Policy) explains where we disagree.				



### 9. To which parts of the draft Local Plan does your response relate to?

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	11. Richmond & Richmond Hill (Richmond Town Centre and Riverside),
		Site Allocation(s) no./ name	24. Richmond Station, Richmond
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G	Urban Design Study December 2021 . Character Area F1 Central Richmond Conservation Area	

### 10. Please give details below to set out your representation.

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

#### Response

#### **SITE ALLOCATION 24 - RICHMOND STATION, RICHMOND**

Both the title and the draft text of this Site Allocation need substantial amendment.

The title should refer specifically not only to the Station, but also to the post-War, multi-storey NCP car-park to the south of the Station, the post-War parade of single-storey shops fronting The Quadrant (at nos. 27.B to 27.G) and the post-War office-block fronting Drummond's Place to the south and south-west of the Station, to the post-War parade of shops fronting Kew Road (at nos. 2 to 8 consec.) and the offices above (Westminster House) to the north of the Station, and the surface-level car-park to the north of the Station.

A clear distinction needs to be made between proposals directly affecting the Station (together with the tracks and present day-lit, open-air platforms) and those affecting the other buildings and space referred to above. Whilst such proposals need to be coherent, they need to have regard to the substantially different considerations that apply to the present, very fine, locally listed Southern Railway Station complex (and not merely to its front façade to Kew Road and the upper booking-hall), completed in 1937, which is clearly worthy of statutory listing, together with the very fine 19th century platform-canopies serving platforms 4 and 5 and 6 and 7. Given the particular heritage significance of the Station complex - as distinct from the lack of heritage significance of the other buildings and space around the Station (the multi-storey car-park to the south of the Station, the parade of single-storey shops and the office-block fronting The Quadrant and Drummond's Place to the south and south-west of the station, the parade of shops and the offices above fronting Kew Road to the north of the Station, and the surface-level car-park to the north of the Station), there is clearly no scope whatever for the redevelopment of the existing Station complex - or for decking-over the tracks and the present day-lit, open-air platforms.

Continued/

However, this is not to suggest that there is no scope to enhance the existing Station complex - principally by carefully reinstating and restoring its original and very distinctive architectural interest and integrity, which has long remained a desirable objective, involving the removal of a series of damaging alterations carried out over recent years. Importantly, too, any proposed decking-over of the existing platforms and tracks and the resulting loss of daylighting and natural ventilation for the travelling public would not only have a massive and damaging impact on the amenity presently enjoyed by the public using the Station, but would also be wholly inconsistent with current national, London-wide and local sustainability interests.

Most importantly, any significant increase in retail, leisure and/or entertainment uses on the site is most likely to harm damage the viability and vitality of the existing and long-established retail, leisure and entertainment in the heart of the Town to the south by drawing people away from The Quadrant, George Street, Sheen Road, The Square, Duke Street, King Street, Red Lion Street, Hill Street and Bridge Street. Similarly, any significant increase in retail, leisure and/or entertainment uses on the site is likely to necessitate a significant level of vehicular servicing that could only be provided via The Quadrant or Kew Road.

Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the suggested suitability of the Station site and its immediate setting as 'a tall building zone (7-8 storeys)... with the opportunity for a landmark building' is wholly unacceptable, unrealistic and needs to be omitted altogether.

Importantly, there is a clear need to fundamentally review and revise the current Development Brief for the Station site which dates back to March, 2002.

End

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Response 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	X	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	11. Richmond & Richmond Hill (Richmond Town Centre and Riverside),
		Site Allocation(s) no./ name	25. Former House of Fraser, 16, Paved Court, 20, King Street, 4 to 8 and 10, Paved Court and 75-81, George Street, Richmond
		Maps	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Urban Design Study December 2021. Character Area F1 Central Richmond and Richmond Green Conservation Area Statements	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Site Allocation 25. Former House of Fraser, 16, Paved Court, 20, King Street, 4 to 8 and 10, Paved Court and 75-81, George Street, Richmond**

The draft text needs to be amended to include specific reference to the need for any development of the site to provide for the enhancement of the external elevations of the existing 1960s building and the complete removal of the existing plant-enclosures at roof level in order to enhance views of the building from The Green and Hill Street, particularly in relation to the setting of the grade II\* listed properties in Old Palace Terrace on Richmond Green, and that any extension or extensions to the existing building should rise no higher than the existing building (i.e. above four storeys), or that any replacement development of the site should rise no higher than that of the existing building .

End

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Response 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	X	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	11. Richmond & Richmond Hill (North Sheen Residential)
		Site Allocation(s) no./name	29. Sainsbury's, Lower Richmond Road and Manor Road, North Sheen, Richmond
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Urban Design Study December 2021. Character Area F3	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response:**

**Site Allocation 29 - Sainsbury's, Lower Richmond Road and Manor Road, North Sheen**

Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text needs to be amended by the deletion of the sentence: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones'.

End

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Response 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	X	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	11. Richmond & Richmond Hill (North Sheen Residential)
		Site Allocation(s) no./ name	28. Homebase, Manor Road, North Sheen, Richmond
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Urban Design Study December 2021. Character Area F3	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response:**

**Site Allocation 28 - Homebase, Manor Road, North Sheen (N.b. Not East Sheen)**

Given the fundamentally flawed analysis and recommendations contained in the relevant parts of Arup's Urban Design Study to which repeated references are made in the draft Local Plan, the draft text of this Site Allocation needs to be amended by the deletion of the statement: 'The Urban Design Study 2021 identifies part of the site as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones', and the statement '...however the Urban Design Study 2021 recommends the appropriate heights for the zone are up to 8 storeys to respect the small scale of the surrounding area'. The draft text needs to be further amended to include specific reference to the need for any new development across the site to rise no higher than four storeys in order to relate the predominantly two-storey scale of the nearby residential areas to the north, north-west, west, south-west, south and east of the site, and to the similarly scaled properties within the nearby Sheendale Road and Sheen Road Conservation Areas'.

End

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Response 10.



**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	X	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	11. Richmond & Richmond Hill (Richmond & Richmond Hill Residentia)
		Site Allocation(s) no./ name	27. The American University, Queen's Road, Richmond
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Urban Design Study December 2021. Character Area F2	
		Richmond Hill Conservation Area Statement	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response:**

**Site Allocation 27. The American University, Queen's Road, Richmond**

The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing buildings on the site should rise no higher than any of the existing buildings on the site, or that any replacement or additional buildings on the site should rise no higher than any of the existing buildings on the site.

End

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Response 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	X	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	11. Richmond & Richmond Hill (Richmond Town Centre and Riverside)
		Site Allocation(s) no./name	26. Richmond Telephone Exchange, Spring Terrace, Richmond
		Maps	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Urban Design Study December 2021. Character Area F1  Sheen Road Conservation Area Statement	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Site Allocation 26 - Richmond Telephone Exchange, Spring Terrace, Richmond**

The draft text needs to be amended to include specific reference to the need for any extension or extensions to the existing building should rise no higher than the three-storey part of the existing building, or that any replacement development of the site should rise no higher than that of the three-storey part of the existing building.

End

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Response 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	18 Development in centres
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Policy 18. Development in centres**

We refer to Arup's Urban Design Study, December 2016; Lichfields Richmond-upon-Thames Retail and Leisure Needs Study Phase 1 Update, July 2021; Icen's Richmond Local Housing Market Assessment, December 2021; and Santec's Employment Land and Premises Needs Assessment, December 2021- all provided as supplementary evidence by the Council.

We have sought to pull together the estimated demand and availability of floor space for all uses in Richmond Town from 2021 to 2039.

**Richmond Zone 1 Retail, Non-retail services and Leisure Floor space**

Lichfields' Report estimates population as shown in Figure 1 and retail, non-retail services and leisure over/under supply in Figure 2. Richmond borough is divided by Lichfields into 7 zones: Richmond, Twickenham, Whitton, Teddington, Hampton, Kew/North Richmond, Barnes/E Sheen. The focus here is on Zone 1 for which a map is shown in Figure 3. The population for the borough is estimated to rise by only 2.9% from 2021 to 2039 and to decline slightly in Richmond Zone 1. The over/under supply of space is calculated by estimating the expenditure per person and then the total available expenditure based on the population. Expenditure from existing facilities is estimated and subtracted from the available expenditure to establish the incremental expenditure from new facilities. This increment is then converted into net floor space by turnover density factors and finally into gross floor space over/under supply. We question why Table 11 page 74 of the Lichfields' Report is headed Gross floor space - a step of first calculating Net floor space seems to be missing.

It is estimated that in 2039 there will be an under supply of retail and non-retail services floor pace of

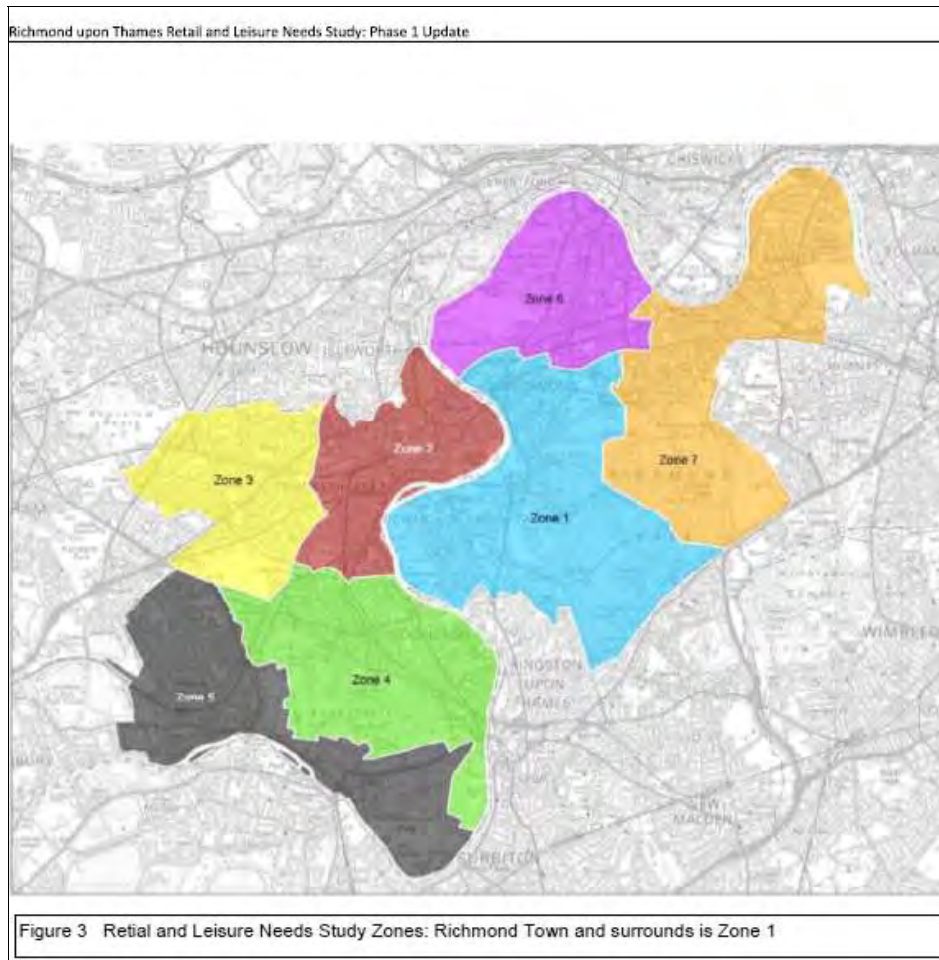
1,457 m2 and an over supply in preceding years. There is an estimated under supply of 7,000 m2 for leisure in 2039 and 4,000 m2 in 2034 but no information for earlier years. Non-retail services include hairdressers, banks, restaurants, cafes and hot food takeaways. Leisure includes cinemas and cultural activities. Home/internet turnover is taken into account.

	Table 1	Population				
		2021	2024	2029	2034	2039
Population Richmond Zone 1 see map attached		23,031	22,440	22,056	22,170	22,536
Population Richmond Borough		199,603	198,220	200,146	201,548	205,200

Figure 1 Source Lichfields report on Retail and Leisure

	Table 3.1a Total 2017 m2	Over(-)/under(+) Supply Cumulative Gross Floorspace				
		2021 m2	2024 m2	2029 m2	2034 m2	2039 m2
Retail Convenience	7,950		-246	-163	55	388
Retail Comparison	31,727		-1,594	-2,075	-1,895	-1,342
Food/beverage	4,640		-3,266	-217	891	2,411
Non-retail Services						
<b>Total</b>	<b>44,317</b>		<b>-5,106</b>	<b>-2,455</b>	<b>-949</b>	<b>1,457</b>
Leisure					4,000	7,000

Figure 2. Source Lichfields report on Retail and Leisure



## **Office Floor Space**

It is claimed by Santec's report that there is an under supply of office space in Richmond borough and that significant space has been lost to residential use through permitted development rights. The report examines four areas of which Richmond Town is one. The Report says 'Occupiers are attracted to Richmond due to the range of quality and size of space as well as access to amenities and rail links to south and central London' The Report estimates the 2021 demand rising from 46,366 m<sup>2</sup> in 2021 to 92,304 m<sup>2</sup> in 2039 across Richmond borough using Experian estimates. Using GLA employment estimates to derive office floor space produces a higher demand of 200,000 m<sup>2</sup> in 2039. Current stock is around 230,000 m<sup>2</sup>. Unfortunately the Santec report does not provide separate figures for Richmond Town but we might assume that since Richmond Town is the largest supplier of office space the estimated under supply also applies in part to Richmond Town.

However, there is existing vacant space in Richmond Town which includes the conversion of the Richmond Magistrates Court (a gain of 4,400 sq m) and Sovereign Gate, Kew Rd (recorded as a 2,600 m<sup>2</sup> and potentially House of Fraser at 5,777 m<sup>2</sup>. There are also a number of smaller vacant units.

## **Housing**

Unfortunately, Icen's report on Housing discusses units but not floor space and it tends to deal with the borough as a whole. We know that the London Plan requires 411 units to be built across the borough each year to 2029. But we saw earlier that the population in Richmond Town is set to decline slightly up to 2039. At a very rough guess of gross 65 m<sup>2</sup> per unit for accommodation the requirement for additional housing would be for around 27,000 m<sup>2</sup> per year across the borough.

## **Supply of Floor space.**

We are concerned that the character of Richmond Town, which is so important in attracting appropriate uses to the town and preserving the town's success for all stakeholders, will be harmed by an imbalance by amount and type in the development of floor space.

We welcome the recognition in the Local Plan of the implications, including the risks, of the new combined business land Use Class E and changes to permitted development rights. There is potential for change in Richmond Town's Key and Secondary Frontage and levels above ground floor and that this may provide beneficial flexibility but it introduces considerable risks of change to the town, which as the Urban Design Study 2021 says is of high sensitivity to change and extensive change is not appropriate. The Council's control is limited to conditions and planning obligations and Article 4 Directions. We note that Key and Secondary Frontage in Richmond Town is unchanged between the Local Plan 2018 and the new draft Local Plan.

## **Conclusion**

We recommend that the several reports on floor space be updated and co-ordinated and besides assessing the borough estimates that they also provide comprehensive estimates across all future uses for Richmond Town. Also, there needs to be a reliable pre-covid Base year stock take for all uses in Richmond Town - say 2019. At the moment the evidence is piecemeal or missing, notwithstanding our attempts at pulling the data together in this response. Furthermore, we believe it would be unwise to place too much weight on the quantitative estimates of the future. Instead there should be recognition of the uncertainties and risks by applying sensitivity analysis and focussing on planning controls the Council can deploy. We do not believe the estimates are sufficiently robust to support major development at Richmond Station or higher buildings.



**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	19 Managing Impacts
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Policy 19 Managing Impacts**

Evening and Night Time Economy. We note support throughout the Local Plan to Richmond Town's Night Time economy and in some cases extending to the Riverside and Richmond Green. We welcome the caveat in the Local Plan, stated in Policy 19, Managing Impacts, that there is a combined and cumulative impact that needs to be controlled and that amenity of residents needs to be protected. It may be semantics but we recommend greater distinction between the evening and night time economies with the later applying to the late evening early hours of the morning.

Richmond town and surrounding areas have one of the highest ratios of pubs and bars to residents in the whole of London and moreover confined to a small area by the Thames and railway line. Public transport is reduced by midnight and is very limited shortly thereafter. Police and cleansing resources are not available at night time. We support the evening economy, and increasing family use, but the town needs to wind down before midnight so residents can get their eight hours sleep as advised by the WHO, difficult as this is with Heathrow night flights starting at 4:30am.

We note Policy 19 does enable the Council to limit closing hours of premises. But we urge the Local Plan to go further. Night time economy infers activity past 11pm into the early hours of the morning and we would urge the Local Plan to explicitly discourage this in Richmond Town, but of course recognising there may be exceptions. Disturbance of residents arises to those living in the heart of the town as well as on and around Richmond Green and along the Riverside which also includes resident disturbance on the Twickenham riverside. We urge better distinction between the evening and night economies.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	28 Local character and design quality (Strategic Policy)
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 28 – Local character and design quality (Strategic Policy)**

The wording of Part A of the Policy needs to be amended to refer to the Borough's conservation areas as well as to the 'character areas' and 'places' identified in the Borough-wide characterisation work undertaken as part of Arup's Urban Design Study given the statutory protection enjoyed by such designated heritage assets under the provisions of the Planning (Listed Buildings and Conservation Areas) Act, 1990, and the National Planning Policy Framework .

The wording needs to be further amended to define 'the places' identified in Arup's Urban Design Study, and the purpose of such a designation.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	29 Designated heritage assets
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Policy 29 – Designated heritage assets**

No change proposed.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	30 Non-designated heritage assets
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Policy 30 – Non-designated heritage assets**

No change proposed.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.



**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	35 Green Belt, Metropolitan Open Land and Local Green Space
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Policy 35 – Green Belt, Metropolitan Open Land and Local Green Space**

Under the heading ‘Proposed changes to the Policies Map’ the landscaped open-space setting of the listed Pools-on-the-Park complex in the Old Deer Park Working needs to be annotated as Metropolitan Open Land in the Policies Map as repeatedly urged by the local community over the last forty years in order to reflect its significant functional and landscape roles and in order to relate to the designation of the surrounding parkland as Metropolitan Open Land. In this connection, it is noted that neither Section 2 nor Section 15 of the draft Local Plan appears to include any reference to a Policies Map. Referring to the note contained under ‘Policies Map for the Local Plan Review, 2015-2018’ in the part of the Council’s current Planning Policy web-site dealing with the current ‘Adopted Local Plan’ (adopted in July, 2018), it is clearly stated that ‘The Council’s Policies Map (formerly called the Proposals Map) will be updated in 2020 to reflect the Local Plan adopted in July, 2018 and March, 2020’. However, to date, this has never been done. There is no published Policies (formerly Proposals) Map beyond that published in July 2015. Prospect of Richmond has picked-up this omission in previous submissions. The omission needs to be urgently remedied.

(In Arup’s 156-page Metropolitan Open Land Review - Annex Report, the Old Deer Park South of A316 ‘Parcel’ (sic) – no. 26 has been severed, wholly unjustifiably, from the remainder of the Old Deer Park covered in the Old Deer Park and Kew Gardens ‘Parcel’ – no. 24 and that part of the Park contained in the Old Palace Lane Richmond Riverside ‘Parcel’ – no. 29), despite its forming an integral part of the Old Deer Park as a specifically registered historic park and a specifically designated conservation area, and its designation with those parts of the Park on the north-western side of the Twickenham Road and the

south-eastern side of the railway viaduct as Metropolitan Open Land and Public Open Space. Importantly, this part of the Park is the most readily and easily accessible part of the public Park from the remainder of the Town and the Riverside on foot given its proximity to the heart of the Town and public transport and car-parking provision. Such a severance in the Metropolitan Open Land Review reflects a fundamentally flawed analysis of the area. Similarly and equally open to serious question is the finding that 'the eastern third of the parcel, is developed and does not meet the MOL criteria' and that its MOL status should be considered further. The parcel is certainly NOT 'largely inaccessible to people' as claimed in the assessment; not least, because it provides an integral part of a direct pedestrian link between Richmond Station, Parkshot, Park Lane, the Old Deer Park Car-park, Richmond Green and the riverside at its south-western end.

In relation to the The Green and Little Green, Richmond 'Parcel' – no. 28, the assessment that these two, vastly important, inter-related public open spaces are only assessed as only 3, 2, 3, 3 and 3 in the criteria summary, rather than as 5, 5, 5, 5 and 5, clearly reflects a fundamentally flawed analysis of the area and failure to recognise its accessibility to the riverside and the heart of the Town. Described by Bridget Cherry and the late Nikolaus Pevsner in relevant volume of *The Buildings of England – London 2: South* as 'one of the most beautiful urban greens surviving anywhere in England', Richmond Green possesses not only considerable architectural, historic and landscape interest and significance, but importantly, constitutes a public open space of outstanding amenity value to the local and wider community.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	37 Public open space, play, sport and recreation
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 37 – Public open space, play, sport and recreation - No change proposed.**

No change proposed.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	43 Floodlighting and other external artificial lighting
		Place-based strategy	
		Site Allocation(s) no./ name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 43 – Floodlighting and other external artificial lighting**

No change proposed.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	44 Design Process
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 44 – Design Process**

The wording of Part B of the Policy needs to be amended to omit reference to ‘the design guidance for the relevant character area as specified within the Urban Design Study 2021’ insofar as it refers to Tall and Mid-rise Building Zones in Figure 383 (on page 254) and in ‘F. Richmond and Richmond Hill’ (on page 255).

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.



**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input checked="" type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	45 Tall and mid-rise zones
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	G		

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**POLICY 45 –Tall and mid-rise zones**

The wording of the Policy 45 needs to be substantially amended to omit any reference to the acceptability of development above five storeys (15 m.) in height anywhere in Character Areas F1, F2, F3 and G1 – whether defined as a ‘Tall’ or ‘Mid-rise’ buildings. Accordingly, diagrams 27.21 and 27.22 – Richmond Station: Tall Building Zone and Mid-Rise Zone, and diagrams 27.24 and 27.25 – North Sheen (Lower Richmond Road and Homebase Sites): Tall Building Zone and Mid-rise Zone, in Appendix 3: Tall and Mid-rise Building Zones, need to be omitted or substantially amended, and the Policies Map adjusted accordingly. Such a policy would properly reflect the very maximum height of existing development across Character Areas F1, F2, F3 and G1 and in most other areas within the Borough. The highly contentious proposed policy of acceptance of ‘Tall buildings and Mid-rise Zones development rising above five storeys (15 m.) would appear to be drawn from the design guidance contained in Sections 4.6, 5.2 and 5.5 and Appendix A of Arup's Urban Design Study, parts of which reflect a fundamentally flawed analysis and appreciation of the area, including parts of Sections A.3\* and B.6, Figure 383 – Richmond and Richmond Hill Tall and Mid-rise Buildings Zone map (on page 254) and the diagrams under the heading ‘F. Richmond and Richmond Hill’ relating to the Richmond Station, the Homebase and Lower Richmond Road Sites (on page 255). \* In particular the text and diagrams for the Richmond Station, Lower Richmond Road and North Sheen (Homebase) Sites contained under Tall Building Zone Place F for Richmond and Richmond Hill on pages 324 to 327.

Finally, the highly questionable claim made in paragraph 22.12 of the supporting text for Policy 45 to the effect that ‘Tall buildings can make a crucial, positive contribution to good design as well as providing densities supporting scheme viability, maximising the delivery of affordable housing and optimising the use of land’ has no relevance at all to the existing urban character of Richmond, its sustainable

development, its enhancement or the provision of 'affordable housing' for Londoners – let alone the delivery social housing. In this connection, it is significant that some of the highest density of housing in the Richmond area and other areas of London developed over the last one hundred and thirty years has been secured in developments rising to no greater than four or five storeys in height.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

**9. To which parts of the draft Local Plan does your response relate to?**

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

Documents		Sections	
Draft Local Plan	<input type="checkbox"/>	Page number(s)	
		Paragraph number(s)	
		Policy no./name	
		Place-based strategy	
		Site Allocation(s) no./name	
		Maps	
		Tables	
Sustainability Appraisal Report	G	Page number(s)	
		Paragraph number(s)	
Other (for example an omission or alternative approach, or in relation to another supporting document/evidence base)	X	Draft new Local Plan Introduction Section 2.44 and 2.45 Heathrow	

**10. Please give details below to set out your representation.**

Please make it very clear to which document your comments relate to by indicating policy/place-based strategy/site reference, name and number, and/or paragraph number.

**Response**

**Draft new Local Plan Introduction Section 2.44 and 2.45 Heathrow**

The only reference to Heathrow in the Local Plan is in Introduction Section 2.44 and 2.45, where it is stated that *'The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the Corporate Plan 2018 – 2022. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights,..'* *'The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary.'*

There is an SPD: Development Control for Noise Generating and Noise Sensitive Development, 2018, which refers to Heathrow but in our view is substantially deficient in this respect.

Government/CAA required Airspace Modernisation is fully underway with potentially substantial changes to flight path noise allocation, while Heathrow expansion is on hold and may never take place. The airspace is an important "asset" above Richmond residents (not only for Heathrow traffic but increasingly for air taxis, drones, etc).

There is a set of Rules established by ICAO (the UN aviation body) for noise management which is the Balanced Approach. It sets the priorities - starting with reduction of noise at source (i.e. less noisy aircraft), followed by land use, operations and finally restricting traffic movements. Land use is about not developing housing and vulnerable uses and/or mitigating noise where there is significant noise impact on health and well being from overflight.

There are other national noise policies that could be deployed to deal with Heathrow noise.

At the moment the Noise England Statement on Noise 2010 uses a threshold of 51 decibels (LAeq) for daytime. Heathrow aircraft noise levels in Richmond borough are at least 60 dbA in some places. WHO Guidance threshold levels are 45 dbA day and 40dbA night.

Under these circumstances, and given our long involvement as Richmond Heathrow Campaign, we recommend the Council develop a Planning Approach and Policy to deal with housing and other developments exposed to noise from Heathrow aircraft and from the emerging air taxis and drones. A number of developments, such as at Manor Road and Stag Brewery would be significantly affected by aircraft noise, especially on arrivals under the Heathrow landing flight paths. But Airspace Modernisation will affect the whole borough potentially and while the 4 year process takes place there will be uncertainty and blight.

We are engaged with Heathrow and other local authorities on this topic and would be pleased to contribute to Richmond council's future deliberations.

**11. Please set out what change(s) you consider necessary, why these changes should be made and what your supporting evidence is.**

**Response:**

See Section 10.

Signed:  
Peter Willan,  
Paul Velluet,  
Laurence Bain  
31 January 2022



# DRAFT LOCAL VIEWS SUPPLEMENTARY PLANNING DOCUMENT (SPD)

## Richmond-Upon-Thames Council (the Council) Consultation Response from The Friends of Richmond Green (FoRG) 5 September 2022

### INTRODUCTION

This response is written on behalf of the Friends of Richmond Green. FoRG are a long established amenity group covering around 350 households around Richmond Green and Little Green and in the vicinity down to the river Thames. We aim to preserve the special qualities, character and setting of the historic Richmond Green. The Green is a wonderful setting with many historic views and vistas and is a major attraction for people visiting the town, its shops and offices and is much appreciated by the many residents in the vicinity of the Richmond Green as well as residents in the town's wider reaches. We believe Harm to the Site and setting should be avoided at all costs. FoRG is a member of the Town Centre Group and Old Deer Park Working Group, both of which engage fully with the Council. We work closely with the Council's Parks and Tree Teams.

The Richmond Green, Richmond Riverside, Central Richmond and Richmond Hill Conservation Area Studies are being refreshed with the consultations just ended. We understand the Old Deer Park Conservation Area will be refreshed in the near future along with other Conservation Area Studies in the borough. It will be important to integrate the Local Views SPD with the five Conservation Area Statements and Management Plans.

Some of the adopted and new proposed views require gaps and some of these are currently impeded by trees and vegetation which we identify in this response.

We have approached the subject of views in the context of the Local Plan Policy LP5 and the relevance of the views to the setting of Heritage assets and to visual amenity. LP5 Views and Vistas says '*Seeks to protect and improve the quality of views, vistas, gaps and the skyline which contribute significantly to the character and quality of the local and wider area.*'

For ease of reference we include in the Annex the data sheet for each of the adopted and new views proposed. The Old Deer Park Working Group are also responding to the consultation and we recommend cross referencing with their response. Their focus is on the Old Deer Park Conservation Area but when discussing Views they should not be confined to one or other Conservation Area.

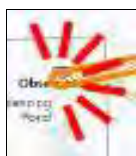
**In summary, the FoRG support the continuation of the adopted views and the proposed new views listed in the draft Local Views SPD and recommend some additional linear and landscape views for consideration. We also recommend ongoing maintenance of gaps in the landscape to preserve the views; we have sought to identify where these are currently impeded or are likely to be.**

**SELECTED VIEWS FROM DRAFT SPD RELEVANT TO THE RICHMOND GREEN, RICHMOND RIVERSIDE, CENTRAL RICHMOND AND RICHMOND HILL CONSERVATION AREAS**

C5.1	Twickenham Bridge (north-east)	Prospect	
C5.2	Twickenham Bridge (south-east)	Prospect	
C5.4	Richmond Road East Twickenham	Townscape	
C6.1	Richmond Lock & Weir	Prospect	
F1.1	Richmond Terrace Richmond Hill	Prospect	
F1.2	Richmond Green, Townscape	Townscape	New
F1.3	Richmond Bridge (north-west)	Prospect	
F1.4	Richmond Bridge (south-east)	Prospect	
F1.5	Richmond Riverside (northern bank)	Prospect	New
F1.6	Asgill House	Linear	
F2.1	Church of St Matthias	Townscape	New

**PRESENTATION**

1. We wish to make some suggestions on presentation to provide clarity and accuracy so that those less familiar with a view can be sure of the facts.
  - a. Most images for the views display a marker for the viewing location but C5.4 *Richmond Road, East Twickenham* omits any marker?



**Figure 1**  
Marker at  
Viewing  
Location

- b. The viewing location for three of the views appears to be variable - spread over an area, e.g. C5.4 *Richmond Road, East Twickenham (Townscape Adopted)*, and F1.2 *Richmond Green Surrounding Roads (The Green, Pembroke Villas and Portland Terrace) (Townscape New)*. In the case of Richmond Green we believe it is essential that the viewing locations be at any point 360 degrees around Richmond Green and should include Maids of Honour Row as the fourth side of the Green but this has been omitted from the description. We discuss this later.

c. Local Views map

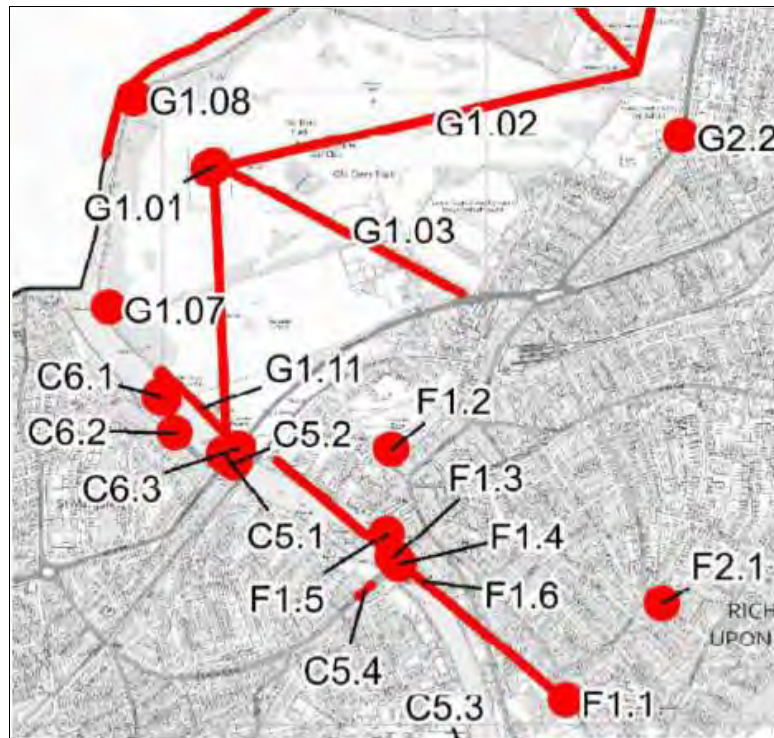


Figure 2 Extract from Local Views map July 2022

- i. Detail is insufficient to be able to identify viewing locations and specific view end points (often the end points can be guessed at but not for all of the views).
  - ii. It would seem the map shows the one linear view relevant to FoRG with a line. The map is busy with views and it would help to distinguish the views by having directional arrows on the lines and an arrow for each of the non-linear views.
- d. Consistency on titles of views could be improved. Most of the titles start with the viewing location, e.g. Richmond Bridge. But F1.6 is titled *Asgill House* and F2.1 is *Church of St Matthias*. In the case of the latter we have not been able to identify the precise viewing location.
- e. Images might be improved:
- i. C5.4 *Richmond Road, East Twickenham (Townscape Adopted)*. On the other side of the Richmond Road there is a K6 Sir Giles Gilbert Scott telephone kiosk which is Grade II listed and it is of significance in conjunction with the adjacent Grade I listed Richmond Bridge (which is not mentioned as such but should be). It may be difficult to include the K6 kiosk in the foreground of the image but we suggest it be attempted and at least its significance be mentioned in the view description. Figure 4 is for illustration only.

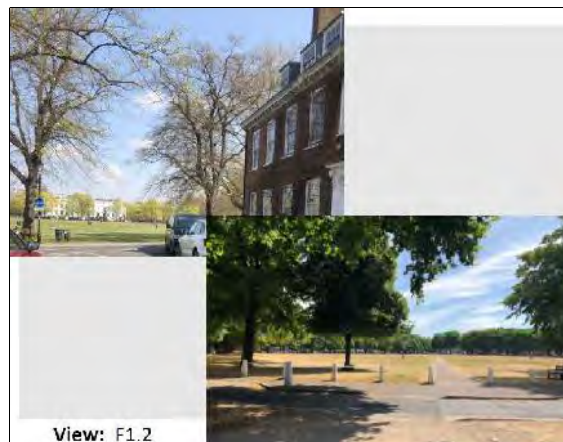


**Figure 3** C5.4 Richmond Road, East Twickenham Prospect Adopted



**Figure 4.** C5.4 Richmond Road, East Twickenham

- ii. F1.1 *Richmond Terrace, Richmond Hill (Prospect Adopted)*. Half the image is taken up by the Terrace, which seems excessive.
- iii. F1.2 *Richmond Green Townscape New*. Two images are provided. These are not perhaps the best selection and are similar in view. We suggest four images showing views of all four sides and possibly trees without leaves would be preferable although the trees are of substantial significance throughout the seasons. We recommend the viewing locations be at any point 360 degrees around Richmond Green and should include Maids of Honour Row as the fourth side of the Green but this has been omitted from the description. Now that the development of the House of Fraser site is being considered we suggest it is opportune to restore the view as a protected view along with the townscape views from the rest of Richmond Green. Figure 6 shows the existing view with ugly plant and machinery on top, which in any development we suggest should be removed and without an additional floor and plant-room on top.



**Figure 5** F1.2 Richmond Green, Townscape New proposed by draft SPD



**Figure 6** View from Richmond Green Existing 80 George Street with Heritage Assets in foreground, 2020

- iv. F1.3 Richmond Bridge (north-east). The two images in a wide angled way distort the bridge itself.
- v. F1.6 Asgill House. Asgill House is difficult to identify from the image.

### **TREE MANAGEMENT NEEDED TO IMPROVE VIEWS**

1. *F1.6 Asgill House (Linear Adopted).*

We suggest the View of Asgill House Linear Adopted from the Terrace, Richmond Hill would benefit from opening the tree gap.



**Figure 7** F1.6 Asgill House



## NEW VIEWS PROPOSED BY FRIENDS OF RICHMOND GREEN

### 1. **Richmond Little Green Townscape**

We recommend the viewing locations be at any point 360 degrees around the Little Green in a similar manner to that proposed for the main Richmond Green (see above).



**Figure 8** Richmond Little Green Townscape

### 2. **Gatehouse to Old Palace Richmond Green Townscape**

On the assumption a 360 degree view is adopted for Richmond Green then this view of the Gatehouse to the Old Palace would be included and not necessary as a separate view.



**Figure 9** Gatehouse to Old Palace, Richmond Green Townscape

### 3. Old Palace Lane Townscape



**Figure 10** Old Palace Lane Townscape. Credit Richmond Museum



4. **Twickenham Road Footbridge to St Matthias Church Spire (Linear)**

St Matthias Church spire is a significant landmark with views from many parts of southwest London. Figures 11 and 13 show a view from the Twickenham Road Footbridge and another from within the ODP Recreation Ground. Figure 12 shows a view from Richmond Green. We suggest consideration be given to adopting one or more of these views.



**Figure 11** Twickenham Road Footbridge view to St Matthias Church, Richmond Hill



**Figure 12** Richmond Green view to St Matthias Church, Richmond Hill



**Figure 13** ODP view to St Matthias Church, Richmond Hill

5. **View from Richmond Hill towards Richmond Town**

At present trees and other vegetation blocks any view from the Terrace Richmond Hill towards Richmond Town. Consideration might be given to opening up a view. See Figure 14.



**Figure 14** Richmond Hill Terrace view towards Richmond blocked by trees, etc.

6. **View from Richmond Park Pembroke Lodge towards Richmond Town**

? Is there a view to be created.

Vivien Harris, Chair Friends of Richmond Green

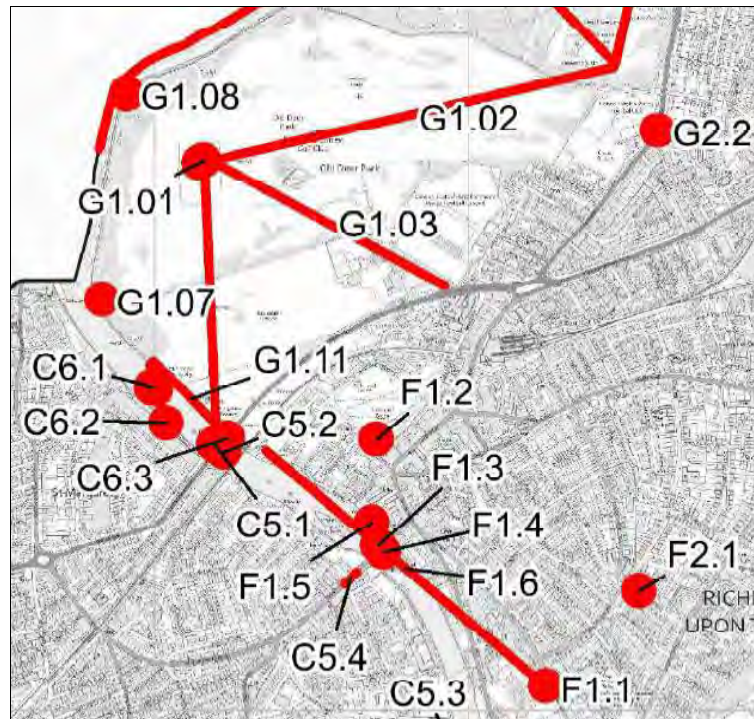
Peter Willan, Member of the Friends of Richmond Green Exec.

Contact [REDACTED]

Annex Attached



**ANNEX**  
**SELECTED VIEWS FROM DRAFT SPD RELEVANT TO THE RICHMOND GREEN, RICHMOND RIVERSIDE, CENTRAL RICHMOND AND RICHMOND HILL CONSERVATION AREAS**



**Figure 1** Extracted from Local Views Map July 2022 for consultation

- C5.1 Twickenham Bridge (north-east), Prospect
- C5.2 Twickenham Bridge (south-east), Prospect
- C6.1 Richmond Lock & Weir, Prospect,
- C6.2 St Margarets Riverside, Prospect
- C6.3 View of the Great Pagoda St Margarets, Linear
- G1.1 Kings Observatory, Old Deer Park, Linear
- G1.2 King's Observatory towards Kew Gardens, Linear
- G1.3 Kings Observatory towards Richmond Town Centre, Linear
- G1.11 Old Deer Park Riverside, Prospect



Character Area Name:

## East Twickenham Residential

View Name and Reference:

### Twickenham Bridge (north-east) (C5.1)

View Type:

**Prospect**

#### Description of View

View from Twickenham Bridge (north-east); travelling into London, spectacular view open up from both the railway and road bridge; encompassing:

- (left) the Victorian Richmond Lock and Weir and the open landscape of the Old Deer Park (usually flooded in winter);
- (left) glimpsed views of the King's Observatory may be possible in the winter;
- (centre) Old Palace Yard river front gardens; and, Richmond Riverside terraces and commercial activity; and,
- (right) view along the River Thames toward Richmond Hill, the Terrace Gardens, and Petersham Meadows.



**View:** C5.1



**GIS Mapping:** C5.1

Viewing Place:

**Bridgescape view (wide)**

Viewing Location:

**Twickenham Bridge**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 9, 10 and view 11 (from Richmond Bridge to Twickenham Bridge)**

**Adopted Local Plan landmarks – Twickenham Bridge, Richmond Lock, Kew Observatory**

#### Visual Management Guidance

Foreground:

Twickenham Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames: urban and landscape character

Background:

Richmond Town Centre buildings (rising on Richmond Hill);  
Richmond Bridge

Character Area Name:

## East Twickenham Residential

View Name and Reference:

### Twickenham Bridge (south-east) (C5.2)

View Type:

**Prospect**

#### Description of View

View from Twickenham Bridge (south-east); travelling out London, spectacular view open up from both the railway and road bridge; encompassing:

- a) (left) Corporation Island, private gardens and moorings edging the River Thames; and,
- b) (right) Ranelagh Drive and St Margarets Riverside.



**View:** C5.2



**GIS Mapping:** C5.2

Viewing Place:

**Bridgescape view (wide)**

Viewing Location:

**Twickenham Bridge**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 9 to 12**

**Adopted Local Plan landmark – Twickenham Bridge**

#### Visual Management Guidance

Foreground:

Twickenham Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames: landscaped embankment and parklands

Background:

Residential housing and gardens

Character Area Name:

## East Twickenham Residential

View Name and Reference:

### Richmond Road, East Twickenham

(C5.4)

View Type:

**Townscape**

#### Description of View

Sequential view from Richmond Road, East Twickenham towards and over Richmond Bridge; encompassing:

- (High Street) three-storey commercial properties framing view north-east towards bridge; Richmond Hill closes view at skyline;
- Road rises with bridge over the River Thames affording short and long distant views of Richmond and surrounds, with the terraces of Richmond Riverside ahead to the left, the mature plane trees to the right; and,
- The road continues to rise with view terminating on the Art Deco facade of the theatre/cinema building.



**View:** C5.4



**GIS Mapping:** C5.4

Viewing Place:

Directional/ Point view (specific)

Viewing Location:

Richmond Road, East Twickenham

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

**New view (proposed)**

Urban Design Study

Adopted Local Plan landmark – Richmond Bridge

#### Visual Management Guidance

Foreground:

Richmond Road, East Twickenham

Middle ground:

Views form Richmond Bridge

Background:

Theatre/ cinema building and Richmond Hill



Character Area Name:

## St Margarets Residential

View Name and Reference:

### Richmond Lock and Weir

(C6.1)

View Type:

**Prospect**

#### Description of View

Long view from Richmond Lock and Weir (Grade II\*); encompassing:

- a) (north) along the River Thames towards Isleworth Ait including winter view into the Old Deer Park and towards the King's Observatory and Kew gardens; and,
- b) (south) along towards the Star and Garter and Richmond Hill; framed view under numerous bridges.



**View: C6.1**



**GIS Mapping: C6.1**

Viewing Place:

Riverscape view (wide)

Viewing Location:

Richmond Lock and Weir's pedestrian walkway

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

Adopted Local Plan landmarks – Richmond Lock, Kew Observatory, Star and Garter Urban Design Study

**New view (proposed)**

#### Visual Management Guidance

Foreground:

Richmond Lock and Weir: Victorian cast iron metal work, industrial and decorative; elevated view over the river

Middle ground:

River Thames

Background:

The River Thames (bend in the river eventually creates a landscape closure to view); Richmond Hill to the south

Character Area Name:

## Richmond Town Centre and Riverside

View Name and Reference:

### Richmond Terrace, Richmond Hill (F1.1)

View Type:

**Prospect**

#### Description of View

Elevated, wide scenic, and sequential view from Richmond Terrace Walk (Grade II\*) across the River Thames valley; multiple viewing points along the viewing terrace; encompassing:

- (foreground) the Victorian Terrace Gardens linking with Buccleuch Gardens towards the river;
- (wider foreground) pastural-looking Petersham Common and Meadow setting the foreground landscape to Petersham Lodge (Grade II) - gleaming white building against the green of the meadow and the darker backdrop of cedars and the horse chestnut avenue;
- (background) the River Thames from Twickenham Bridge, Corporation Island towards Teddington - ranging character from town centre to riparian landscape edge; and,
- (long-distant) views across to Windsor.

The view sweeps over much the same Arcadian landscape which had such influence on the taste and designs of the 18th century. From as early as the mid 17th century a seat had been placed overlooking the view (RPG). It is a view that has inspired musicians, painters, including the famous painting by Turner, and poets from around the world. In 1902 it became the first and only view to be protected by Act of Parliament. From the top of the hill you can see the sun setting over the Chilterns.



**View: F1.1**



**GIS Mapping: F1.1**

Viewing Place:  
**Landscape view (wide)**

Viewing Location:  
**Richmond Terrace Walk**

Viewing Co-ordinates:  
**E: n/a**  
**N: n/a**

Reference Policy:  
Act of Parliament (The Richmond, Petersham and Ham Open Spaces Act 1902)  
Adopted Local Plan  
Urban Design Study: view 5  
Thames Landscape Strategy: Landscape character reach - Richmond (view potentially the most significant view identified in TLS)  
Registered Parks and Gardens: Richmond Terrace Walk Park and Garden (Grade II\*); Terrace and Buccleuch Gardens Park and Garden (Grade II)

#### Visual Management Guidance

Foreground:  
Richmond Terrace Walk

Middle ground:  
River Thames valley and meadows

Background:  
Teddington to Twickenham



Character Area Name:

## Richmond Town Centre and Riverside

View Name and Reference:

### Richmond Green

(F1.2)

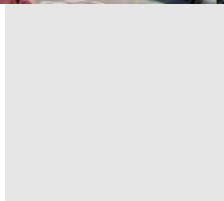
View Type:

### Townscape

#### Description of View

Uninterrupted, open view across Richmond Green, surrounded by a frame of historic buildings contributing to the view's setting; including, multiple glimpses from surrounding roads and narrow lanes which radiate off The Green. The Green offers an open landscape expanse which offers a scenic contrast with the enclosed alleyways to the town centre.

CA appraisal: The Green is a fine example of an early urban (village) Green with a feeling of formal elegance and provides a fittingly grand setting of the houses that surround it. Little built form intrudes into the sky above the surrounding buildings emphasising the inward looking, almost isolated feel of the space.



View: F1.2



GIS Mapping: F1.2

Viewing Place:

Parkscape view (wide)

Viewing Location:

Surrounding roads (The Green, Pembroke Villas and Portland Terrace)

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

**New view (proposed)**

#### Visual Management Guidance

Foreground:

The Green

Middle ground:

Spaces and landscaping around The Green

Background:

Surrounding buildings

Character Area Name:

## Richmond Town Centre and Riverside

View Name and Reference:

### Richmond Bridge (north-west)

(F1.3)

View Type:

**Prospect**

#### Description of View

View west (downstream) from Richmond Bridge, along the River Thames towards Twickenham Railway; encompassing:

- Richmond Riverside: commercial and leisure activity (restaurants, retail, boat hire moorings);
- (foreground right) the Old Town Hall and Palm Court Hotel and landmark belvedere tower (Grade II) fronting the terraces;
- (middle distance) the White Cross hotel on the riverside and Asgill House (Grade I); and,
- (background) arched Twickenham road and railway bridges, Richmond Lock and Weir, and the mature landscape intruding of Old Deer Park beyond; and wooded Corporation and Flowerpot Islands.



**View: F1.3**



**GIS Mapping: F1.3**

Viewing Place:

**Bridgescape view (wide)**

Viewing Location:

**Richmond Bridge**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 11**

**Adopted Local Plan landmark – Richmond Bridge**

#### Visual Management Guidance

Foreground:

Richmond Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames

Background:

Twickenham Railway Bridge; with landscaping beyond

Character Area Name:

## Richmond Town Centre and Riverside

View Name and Reference:

### Richmond Bridge (south-east)

(F1.4)

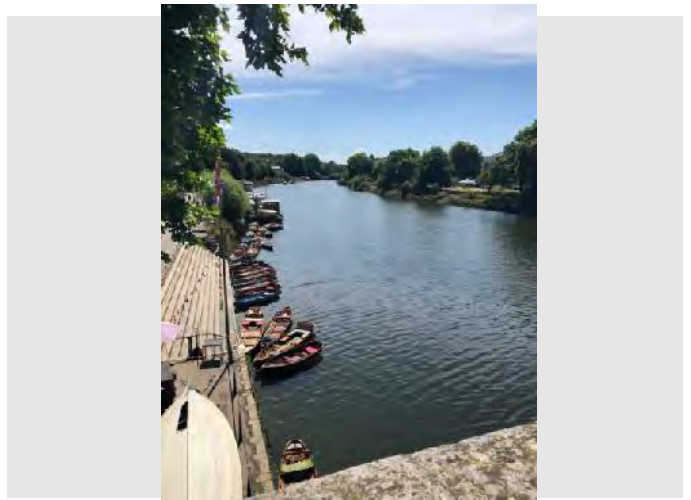
View Type:

**Prospect**

#### Description of View

View east (upstream) along the River Thames from Richmond Bridge towards Richmond Hill; encompassing:

- The rising slopes of Richmond Hill - development rising up the hill framed/screened by landscape to a tree-lined horizon;
- Contrasting river edges - wooded and vegetated river banks, providing a semi-natural character; urban to residential edge; pastoral, water meadows in the distance.



**View: F1.4**



**GIS Mapping: F1.4**

Viewing Place:

**Bridgescape view (wide)**

Viewing Location:

**Richmond Bridge**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 12**

**Adopted Local Plan landmark – Richmond Bridge**

#### Visual Management Guidance

Foreground:

Richmond Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames

Background:

Petersham Meadow and Richmond Hill to the skyline



Character Area Name:

## Richmond Town Centre and Riverside

View Name and Reference:

### Richmond riverside (northern bank)

(F1.5)

View Type:

**Prospect**

#### Description of View

Multiple sequential view along Richmond Riverside, adjacent to the River Thames' northern bank; encompassing:

- (upstream) open landscape of Terrace and Buccleuch Gardens (Grade II); looking downstream towards the stone-arched Richmond Bridge framing downstream view;
- (centre) river edge, open parkland spaces framed by the elevated properties along Petersham Road; sheltered Bridge House Gardens, and the Riverside terraces;
- (downstream) The historic White Cross, former Richmond Palace and walled garden, leading along Cholmondeley Walk under Twickenham Railway Bridge towards the Old Deer Park; and,
- View to the opposite green river bank, characterised by mature trees and mansion blocks in East Twickenham.



**View: F1.5**



**GIS Mapping: F1.5**

Viewing Place:

**Riverscape view (wide)**

Viewing Location:

**River Thames Pathway**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan landmark – Richmond Bridge**

**New view (proposed)**

#### Visual Management Guidance

Foreground:

River Thames Pathway

Middle ground:

River Thames

Background:

Urban and landscape frame

Character Area Name:

**Richmond Town Centre and Riverside**

View Name and Reference:

**Asgill House**

**(F1.6)**

F1

L

View Type:

**Linear**

**Description of View**

View from Richmond Hill to Richmond Bridge and Asgill House. Asgill House (Grade I), an 18th-century Palladian villa, sits within the former historic grounds of Richmond Palace, acting as the ending visual termini to Richmond riverside (downstream).



**View: F1.6**



**GIS Mapping: F1.6**

Viewing Place:

**Directional/ Point view (specific)**

Viewing Location:

**Richmond Hill**

Viewing Co-ordinates:

**E: tbc**

**N: tbc**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 5**

**Visual Management Guidance**

Foreground:

**Terrace Field**

Middle ground:

**Landscape frame, from the slope of Richmond Hill**

Background:

**Asgill House**



Character Area Name:

**Richmond and Richmond Hill**

**Residential**

View Name and Reference:

**Church of St Matthias**

**(F2.1)**

View Type:

**Townscape**

F2  
T

**Description of View**

Multiple short distance view of the Church of St Matthias (Grade II) and its distinctive stone spire, distinctive at the top of Richmond Hill (elevation 195 feet). View from surrounding residential streets including Park Road, Mount Ararat Road, Church Road and King's Road. Described by Pevsner as 'the grandest church in Richmond.'



**View: F2.1**



**GIS Mapping: F2.1**

Viewing Place:

**Directional/ Point view (specific)**

Viewing Location:

**Richmond residential properties**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan landmark – St Matthias Church**

**St. Matthias Conservation Area**

**New view (proposed)**

**Visual Management Guidance**

Foreground:

Richmond residential properties

Middle ground:

Richmond residential properties

Background:

Due to elevated position, it is cast against the skyline

## DRAFT LOCAL VIEWS SUPPLEMENTARY PLANNING DOCUMENT (SPD)

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Some of the adopted and new proposed views require gaps and some of these are currently impeded by trees and vegetation which we identify in this response.

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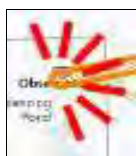
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F1.4	Richmond Bridge (south-east)	Prospect	
F1.5	Richmond Riverside (northern bank)	Prospect	New
F1.6	Asgill House	Linear	
F2.1	Church of St Matthias	Townscape	New

**PRESENTATION**

1. We wish to make some suggestions on presentation to provide clarity and accuracy so that those less familiar with a view can be sure of the facts.
  - a. Most images for the views display a marker for the viewing location but C5.4 *Richmond Road, East Twickenham* omits any marker?



**Figure 1**  
Marker at  
Viewing  
Location

- b. The viewing location for three of the views appears to be variable - spread over an area, e.g. C5.4 *Richmond Road, East Twickenham (Townscape Adopted)*, and F1.2 *Richmond Green Surrounding Roads (The Green, Pembroke Villas and Portland Terrace) (Townscape New)*. In the case of Richmond Green we believe it is essential that the viewing locations be at any point 360 degrees around Richmond Green and should include Maids of Honour Row as the fourth side of the Green but this has been omitted from the description. We discuss this later.

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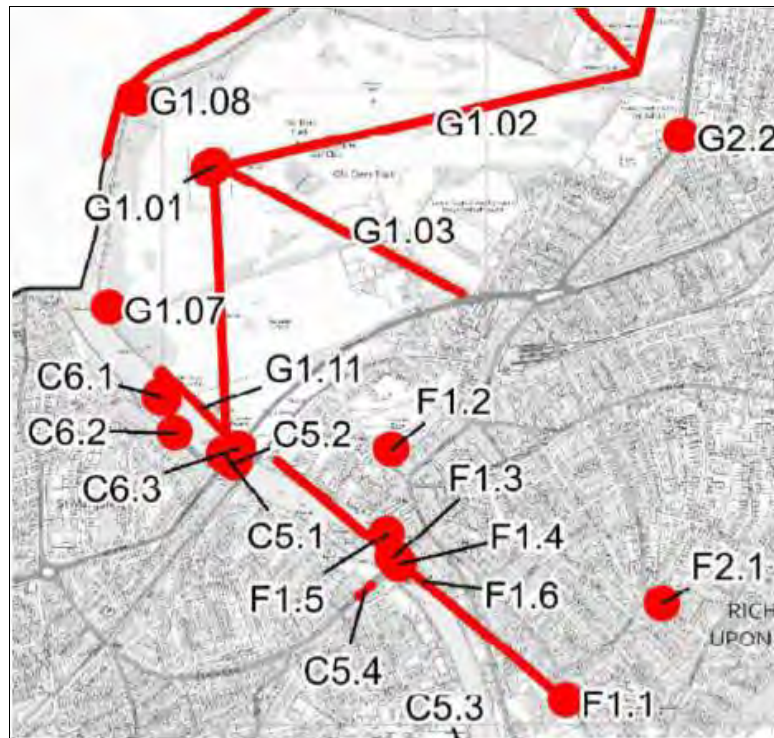


Figure 2 Extract from Local Views map July 2022

- i. Detail is insufficient to be able to identify viewing locations and specific view end points (often the end points can be guessed at but not for all of the views).
  - ii. It would seem the map shows the one linear view relevant to FoRG with a line. The map is busy with views and it would help to distinguish the views by having directional arrows on the lines and an arrow for each of the non-linear views.
- d. Consistency on titles of views could be improved. Most of the titles start with the viewing location, e.g. Richmond Bridge. But F1.6 is titled *Asgill House* and F2.1 is *Church of St Matthias*. In the case of the latter we have not been able to identify the precise viewing location.
- e. Images might be improved:
- i. C5.4 *Richmond Road, East Twickenham (Townscape Adopted)*. On the other side of the Richmond Road there is a K6 Sir Giles Gilbert Scott telephone kiosk which is Grade II listed and it is of significance in conjunction with the adjacent Grade I listed Richmond Bridge (which is not mentioned as such but should be). It may be difficult to include the K6 kiosk in the foreground of the image but we suggest it be attempted and at least its significance be mentioned in the view description. Figure 4 is for illustration only.



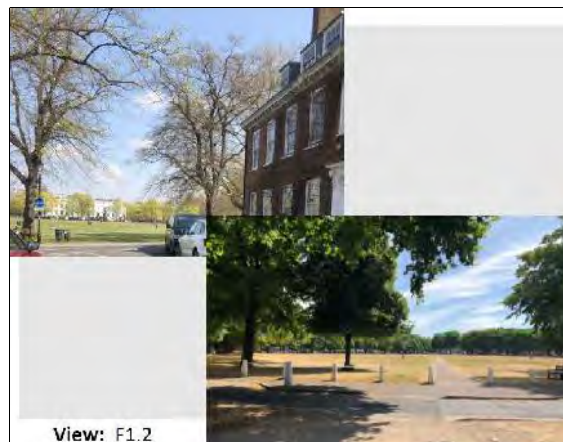


**Figure 3** C5.4 Richmond Road, East Twickenham Prospect Adopted



**Figure 4.** C5.4 Richmond Road, East Twickenham

- ii. F1.1 *Richmond Terrace, Richmond Hill (Prospect Adopted)*. Half the image is taken up by the Terrace, which seems excessive.
- iii. F1.2 *Richmond Green Townscape New*. Two images are provided. These are not perhaps the best selection and are similar in view. We suggest four images showing views of all four sides and possibly trees without leaves would be preferable although the trees are of substantial significance throughout the seasons. We recommend the viewing locations be at any point 360 degrees around Richmond Green and should include Maids of Honour Row as the fourth side of the Green but this has been omitted from the description. Now that the development of the House of Fraser site is being considered we suggest it is opportune to restore the view as a protected view along with the townscape views from the rest of Richmond Green. Figure 6 shows the existing view with ugly plant and machinery on top, which in any development we suggest should be removed and without an additional floor and plant-room on top.



**Figure 5** F1.2 Richmond Green, Townscape New proposed by draft SPD





**Figure 6** View from Richmond Green Existing 80 George Street with Heritage Assets in foreground, 2020

- iv. F1.3 Richmond Bridge (north-east). The two images in a wide angled way distort the bridge itself.
- v. F1.6 Asgill House. Asgill House is difficult to identify from the image.

### **TREE MANAGEMENT NEEDED TO IMPROVE VIEWS**

1. *F1.6 Asgill House (Linear Adopted).*  
We suggest the View of Asgill House Linear Adopted from the Terrace, Richmond Hill would benefit from opening the tree gap.



**Figure 7** F1.6 Asgill House

## NEW VIEWS PROPOSED BY FRIENDS OF RICHMOND GREEN

### 1. **Richmond Little Green Townscape**

We recommend the viewing locations be at any point 360 degrees around the Little Green in a similar manner to that proposed for the main Richmond Green (see above).



**Figure 8** Richmond Little Green Townscape

### 2. **Gatehouse to Old Palace Richmond Green Townscape**

On the assumption a 360 degree view is adopted for Richmond Green then this view of the Gatehouse to the Old Palace would be included and not necessary as a separate view.



**Figure 9** Gatehouse to Old Palace, Richmond Green Townscape

### 3. Old Palace Lane Townscape



**Figure 10** Old Palace Lane Townscape. Credit Richmond Museum



4. **Twickenham Road Footbridge to St Matthias Church Spire (Linear)**

St Matthias Church spire is a significant landmark with views from many parts of southwest London. Figures 11 and 13 show a view from the Twickenham Road Footbridge and another from within the ODP Recreation Ground. Figure 12 shows a view from Richmond Green. We suggest consideration be given to adopting one or more of these views.



**Figure 11** Twickenham Road Footbridge view to St Matthias Church, Richmond Hill



**Figure 12** Richmond Green view to St Matthias Church, Richmond Hill



**Figure 13** ODP view to St Matthias Church, Richmond Hill

5. **View from Richmond Hill towards Richmond Town**

At present trees and other vegetation blocks any view from the Terrace Richmond Hill towards Richmond Town. Consideration might be given to opening up a view. See Figure 14.



**Figure 14** Richmond Hill Terrace view towards Richmond blocked by trees, etc.

6. **View from Richmond Park Pembroke Lodge towards Richmond Town**

? Is there a view to be created.

Vivien Harris, Chair Friends of Richmond Green

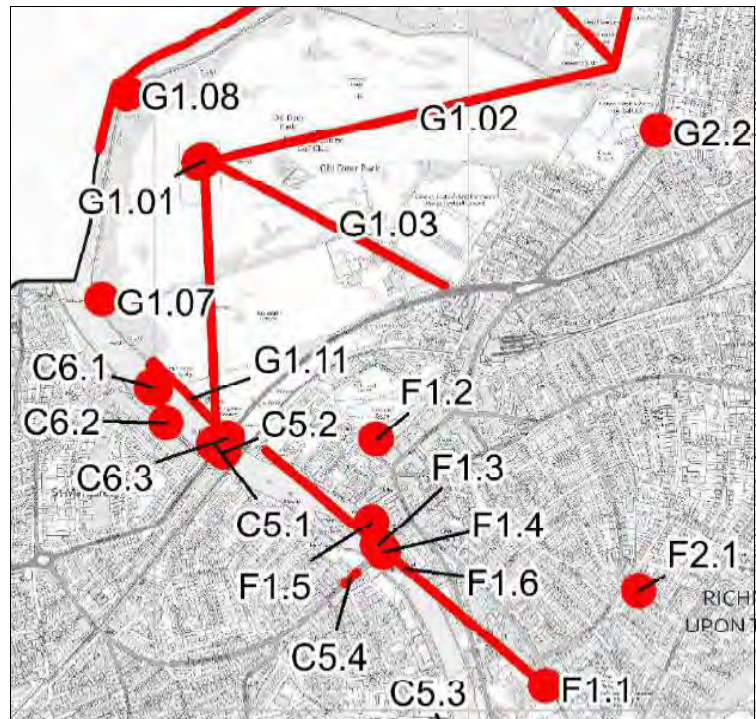
Peter Willan, Member of the Friends of Richmond Green Exec.

Contact [REDACTED]

Annex Attached



**ANNEX**  
**SELECTED VIEWS FROM DRAFT SPD RELEVANT TO THE RICHMOND GREEN, RICHMOND RIVERSIDE, CENTRAL RICHMOND AND RICHMOND HILL CONSERVATION AREAS**



**Figure 1** Extracted from Local Views Map July 2022 for consultation

- C5.1 Twickenham Bridge (north-east), Prospect
- C5.2 Twickenham Bridge (south-east), Prospect
- C6.1 Richmond Lock & Weir, Prospect,
- C6.2 St Margarets Riverside, Prospect
- C6.3 View of the Great Pagoda St Margarets, Linear
- G1.1 Kings Observatory, Old Deer Park, Linear
- G1.2 King's Observatory towards Kew Gardens, Linear
- G1.3 Kings Observatory towards Richmond Town Centre, Linear
- G1.11 Old Deer Park Riverside, Prospect

Character Area Name:

## East Twickenham Residential

View Name and Reference:

### Twickenham Bridge (north-east) (C5.1)

View Type:

**Prospect**

#### Description of View

View from Twickenham Bridge (north-east); travelling into London, spectacular view open up from both the railway and road bridge; encompassing:

- (left) the Victorian Richmond Lock and Weir and the open landscape of the Old Deer Park (usually flooded in winter);
- (left) glimpsed views of the King's Observatory may be possible in the winter;
- (centre) Old Palace Yard river front gardens; and, Richmond Riverside terraces and commercial activity; and,
- (right) view along the River Thames toward Richmond Hill, the Terrace Gardens, and Petersham Meadows.



**View:** C5.1



**GIS Mapping:** C5.1

Viewing Place:

**Bridgescape view (wide)**

Viewing Location:

**Twickenham Bridge**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 9, 10 and view 11 (from Richmond Bridge to Twickenham Bridge)**

**Adopted Local Plan landmarks – Twickenham Bridge, Richmond Lock, Kew Observatory**

#### Visual Management Guidance

Foreground:

Twickenham Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames: urban and landscape character

Background:

Richmond Town Centre buildings (rising on Richmond Hill);  
Richmond Bridge

Character Area Name:

## East Twickenham Residential

View Name and Reference:

### Twickenham Bridge (south-east) (C5.2)

View Type:

**Prospect**

#### Description of View

View from Twickenham Bridge (south-east); travelling out London, spectacular view open up from both the railway and road bridge; encompassing:

- a) (left) Corporation Island, private gardens and moorings edging the River Thames; and,
- b) (right) Ranelagh Drive and St Margarets Riverside.



**View:** C5.2



**GIS Mapping:** C5.2

Viewing Place:

**Bridgescape view (wide)**

Viewing Location:

**Twickenham Bridge**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 9 to 12**

**Adopted Local Plan landmark – Twickenham Bridge**

#### Visual Management Guidance

Foreground:

Twickenham Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames: landscaped embankment and parklands

Background:

Residential housing and gardens



Character Area Name:

## East Twickenham Residential

View Name and Reference:

### Richmond Road, East Twickenham

(C5.4)

View Type:

**Townscape**

#### Description of View

Sequential view from Richmond Road, East Twickenham towards and over Richmond Bridge; encompassing:

- (High Street) three-storey commercial properties framing view north-east towards bridge; Richmond Hill closes view at skyline;
- Road rises with bridge over the River Thames affording short and long distant views of Richmond and surrounds, with the terraces of Richmond Riverside ahead to the left, the mature plane trees to the right; and,
- The road continues to rise with view terminating on the Art Deco facade of the theatre/cinema building.



**View:** C5.4



**GIS Mapping:** C5.4

Viewing Place:

Directional/ Point view (specific)

Viewing Location:

Richmond Road, East Twickenham

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

**New view (proposed)**

Urban Design Study

Adopted Local Plan landmark – Richmond Bridge

#### Visual Management Guidance

Foreground:

Richmond Road, East Twickenham

Middle ground:

Views form Richmond Bridge

Background:

Theatre/ cinema building and Richmond Hill

Character Area Name:

## St Margarets Residential

View Name and Reference:

### Richmond Lock and Weir

(C6.1)

View Type:

**Prospect**

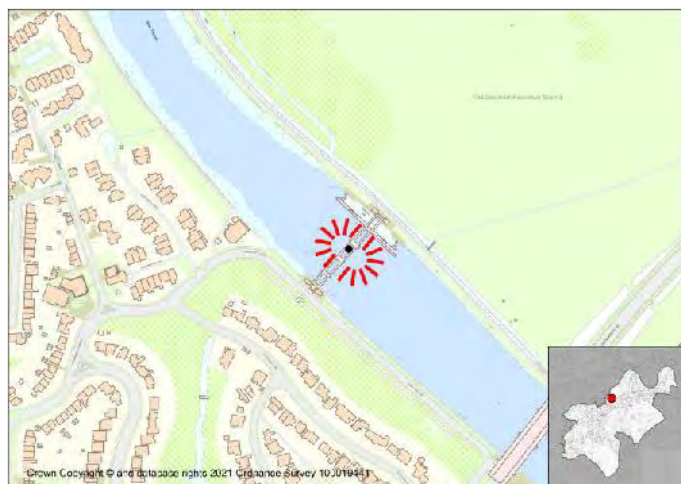
#### Description of View

Long view from Richmond Lock and Weir (Grade II\*); encompassing:

- a) (north) along the River Thames towards Isleworth Ait including winter view into the Old Deer Park and towards the King's Observatory and Kew gardens; and,
- b) (south) along towards the Star and Garter and Richmond Hill; framed view under numerous bridges.



**View: C6.1**



**GIS Mapping: C6.1**

Viewing Place:

Riverscape view (wide)

Viewing Location:

Richmond Lock and Weir's pedestrian walkway

Viewing Co-ordinates:

E: n/a

N: n/a

Reference Policy:

Adopted Local Plan landmarks – Richmond Lock, Kew Observatory, Star and Garter Urban Design Study

**New view (proposed)**

#### Visual Management Guidance

Foreground:

Richmond Lock and Weir: Victorian cast iron metal work, industrial and decorative; elevated view over the river

Middle ground:

River Thames

Background:

The River Thames (bend in the river eventually creates a landscape closure to view); Richmond Hill to the south



Character Area Name:

## Richmond Town Centre and Riverside

View Name and Reference:

### Richmond Terrace, Richmond Hill (F1.1)

View Type:

Prospect

#### Description of View

Elevated, wide scenic, and sequential view from Richmond Terrace Walk (Grade II\*) across the River Thames valley; multiple viewing points along the viewing terrace; encompassing:

- a) (foreground) the Victorian Terrace Gardens linking with Buccleuch Gardens towards the river;
- b) (wider foreground) pastural-looking Petersham Common and Meadow setting the foreground landscape to Petersham Lodge (Grade II) - gleaming white building against the green of the meadow and the darker backdrop of cedars and the horse chestnut avenue;
- c) (background) the River Thames from Twickenham Bridge, Corporation Island towards Teddington - ranging character from town centre to riparian landscape edge; and,
- d) (long-distant) views across to Windsor.

The view sweeps over much the same Arcadian landscape which had such influence on the taste and designs of the 18th century. From as early as the mid 17th century a seat had been placed overlooking the view (RPG). It is a view that has inspired musicians, painters, including the famous painting by Turner, and poets from around the world. In 1902 it became the first and only view to be protected by Act of Parliament. From the top of the hill you can see the sun setting over the Chilterns.



View: F1.1



GIS Mapping: F1.1

Viewing Place:  
Landscape view (wide)

Viewing Location:  
Richmond Terrace Walk

Viewing Co-ordinates:  
E: n/a  
N: n/a

Reference Policy:  
Act of Parliament (The Richmond, Petersham and Ham Open Spaces Act 1902)  
Adopted Local Plan  
Urban Design Study: view 5  
Thames Landscape Strategy: Landscape character reach - Richmond (view potentially the most significant view identified in TLS)  
Registered Parks and Gardens: Richmond Terrace Walk Park and Garden (Grade II\*); Terrace and Buccleuch Gardens Park and Garden (Grade II)

#### Visual Management Guidance

Foreground:  
Richmond Terrace Walk

Middle ground:  
River Thames valley and meadows

Background:  
Teddington to Twickenham

Character Area Name:

**Richmond Town Centre and Riverside**

View Name and Reference:

**Richmond Green**

**(F1.2)**

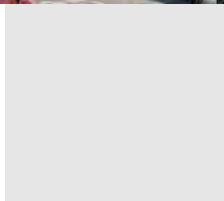
View Type:

**Townscape**

**Description of View**

Uninterrupted, open view across Richmond Green, surrounded by a frame of historic buildings contributing to the view's setting; including, multiple glimpses from surrounding roads and narrow lanes which radiate off The Green. The Green offers an open landscape expanse which offers a scenic contrast with the enclosed alleyways to the town centre.

CA appraisal: The Green is a fine example of an early urban (village) Green with a feeling of formal elegance and provides a fittingly grand setting of the houses that surround it. Little built form intrudes into the sky above the surrounding buildings emphasising the inward looking, almost isolated feel of the space.



**View: F1.2**



**GIS Mapping: F1.2**

Viewing Place:

**Parkscape view (wide)**

Viewing Location:

**Surrounding roads (The Green, Pembroke Villas and Portland Terrace)**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**New view (proposed)**

**Visual Management Guidance**

Foreground:

The Green

Middle ground:

Spaces and landscaping around The Green

Background:

Surrounding buildings

Character Area Name:

**Richmond Town Centre and Riverside**

View Name and Reference:

**Richmond Bridge (north-west)**

**(F1.3)**

View Type:

**Prospect**

**Description of View**

View west (downstream) from Richmond Bridge, along the River Thames towards Twickenham Railway; encompassing:

- a) Richmond Riverside: commercial and leisure activity (restaurants, retail, boat hire moorings);
- b) (foreground right) the Old Town Hall and Palm Court Hotel and landmark belvedere tower (Grade II) fronting the terraces;
- c) (middle distance) the White Cross hotel on the riverside and Asgill House (Grade I); and,
- d) (background) arched Twickenham road and railway bridges, Richmond Lock and Weir, and the mature landscape intruding of Old Deer Park beyond; and wooded Corporation and Flowerpot Islands.



**View: F1.3**



**GIS Mapping: F1.3**

Viewing Place:

**Bridgescape view (wide)**

Viewing Location:

**Richmond Bridge**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 11**

**Adopted Local Plan landmark – Richmond Bridge**

**Visual Management Guidance**

Foreground:

Richmond Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames

Background:

Twickenham Railway Bridge; with landscaping beyond



Character Area Name:

## Richmond Town Centre and Riverside

View Name and Reference:

### Richmond Bridge (south-east)

(F1.4)

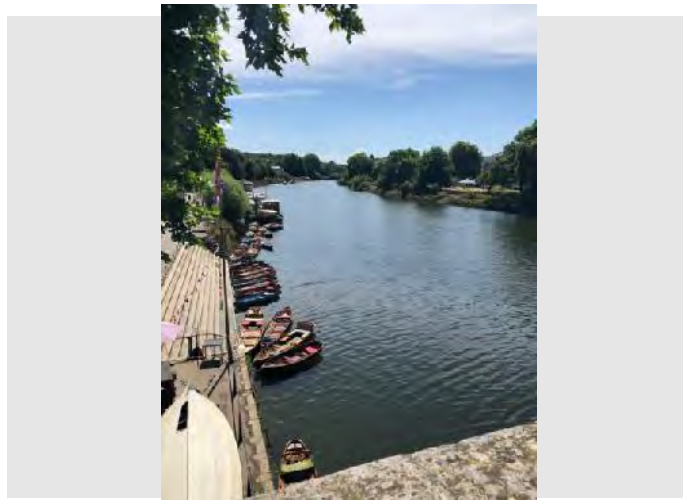
View Type:

**Prospect**

#### Description of View

View east (upstream) along the River Thames from Richmond Bridge towards Richmond Hill; encompassing:

- The rising slopes of Richmond Hill - development rising up the hill framed/screened by landscape to a tree-lined horizon;
- Contrasting river edges - wooded and vegetated river banks, providing a semi-natural character; urban to residential edge; pastoral, water meadows in the distance.



**View:** F1.4



**GIS Mapping:** F1.4

Viewing Place:

**Bridgescape view (wide)**

Viewing Location:

**Richmond Bridge**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 12**

**Adopted Local Plan landmark – Richmond Bridge**

#### Visual Management Guidance

Foreground:

Richmond Bridge low Italianate balustrade wall with Victoria cast iron gas light standards

Middle ground:

River Thames

Background:

Petersham Meadow and Richmond Hill to the skyline

Character Area Name:

## Richmond Town Centre and Riverside

View Name and Reference:

### Richmond riverside (northern bank)

(F1.5)

View Type:

**Prospect**

#### Description of View

Multiple sequential view along Richmond Riverside, adjacent to the River Thames' northern bank; encompassing:

- (upstream) open landscape of Terrace and Buccleuch Gardens (Grade II); looking downstream towards the stone-arched Richmond Bridge framing downstream view;
- (centre) river edge, open parkland spaces framed by the elevated properties along Petersham Road; sheltered Bridge House Gardens, and the Riverside terraces;
- (downstream) The historic White Cross, former Richmond Palace and walled garden, leading along Cholmondeley Walk under Twickenham Railway Bridge towards the Old Deer Park; and,
- View to the opposite green river bank, characterised by mature trees and mansion blocks in East Twickenham.



**View: F1.5**



**GIS Mapping: F1.5**

Viewing Place:

**Riverscape view (wide)**

Viewing Location:

**River Thames Pathway**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan landmark – Richmond Bridge**

**New view (proposed)**

#### Visual Management Guidance

Foreground:

River Thames Pathway

Middle ground:

River Thames

Background:

Urban and landscape frame



Character Area Name:

## Richmond Town Centre and Riverside

View Name and Reference:

### Asgill House

(F1.6)

View Type:

**Linear**

#### Description of View

View from Richmond Hill to Richmond Bridge and Asgill House. Asgill House (Grade I), an 18th-century Palladian villa, sits within the former historic grounds of Richmond Palace, acting as the ending visual termini to Richmond riverside (downstream).



**View:** F1.6



**GIS Mapping:** F1.6

Viewing Place:

**Directional/ Point view (specific)**

Viewing Location:

**Richmond Hill**

Viewing Co-ordinates:

**E: tbc**

**N: tbc**

Reference Policy:

**Adopted Local Plan**

**Urban Design Study: view 5**

#### Visual Management Guidance

Foreground:

**Terrace Field**

Middle ground:

**Landscape frame, from the slope of Richmond Hill**

Background:

**Asgill House**

Character Area Name:

**Richmond and Richmond Hill**

**Residential**

View Name and Reference:

**Church of St Matthias**

**(F2.1)**

View Type:

**Townscape**

### Description of View

Multiple short distance view of the Church of St Matthias (Grade II) and its distinctive stone spire, distinctive at the top of Richmond Hill (elevation 195 feet). View from surrounding residential streets including Park Road, Mount Ararat Road, Church Road and King's Road. Described by Pevsner as 'the grandest church in Richmond.'



**View: F2.1**



**GIS Mapping: F2.1**

Viewing Place:

**Directional/ Point view (specific)**

Viewing Location:

**Richmond residential properties**

Viewing Co-ordinates:

**E: n/a**

**N: n/a**

Reference Policy:

**Adopted Local Plan landmark – St Matthias Church**

**St. Matthias Conservation Area**

**New view (proposed)**

### Visual Management Guidance

Foreground:

**Richmond residential properties**

Middle ground:

**Richmond residential properties**

Background:

**Due to elevated position, it is cast against the skyline**



(A)

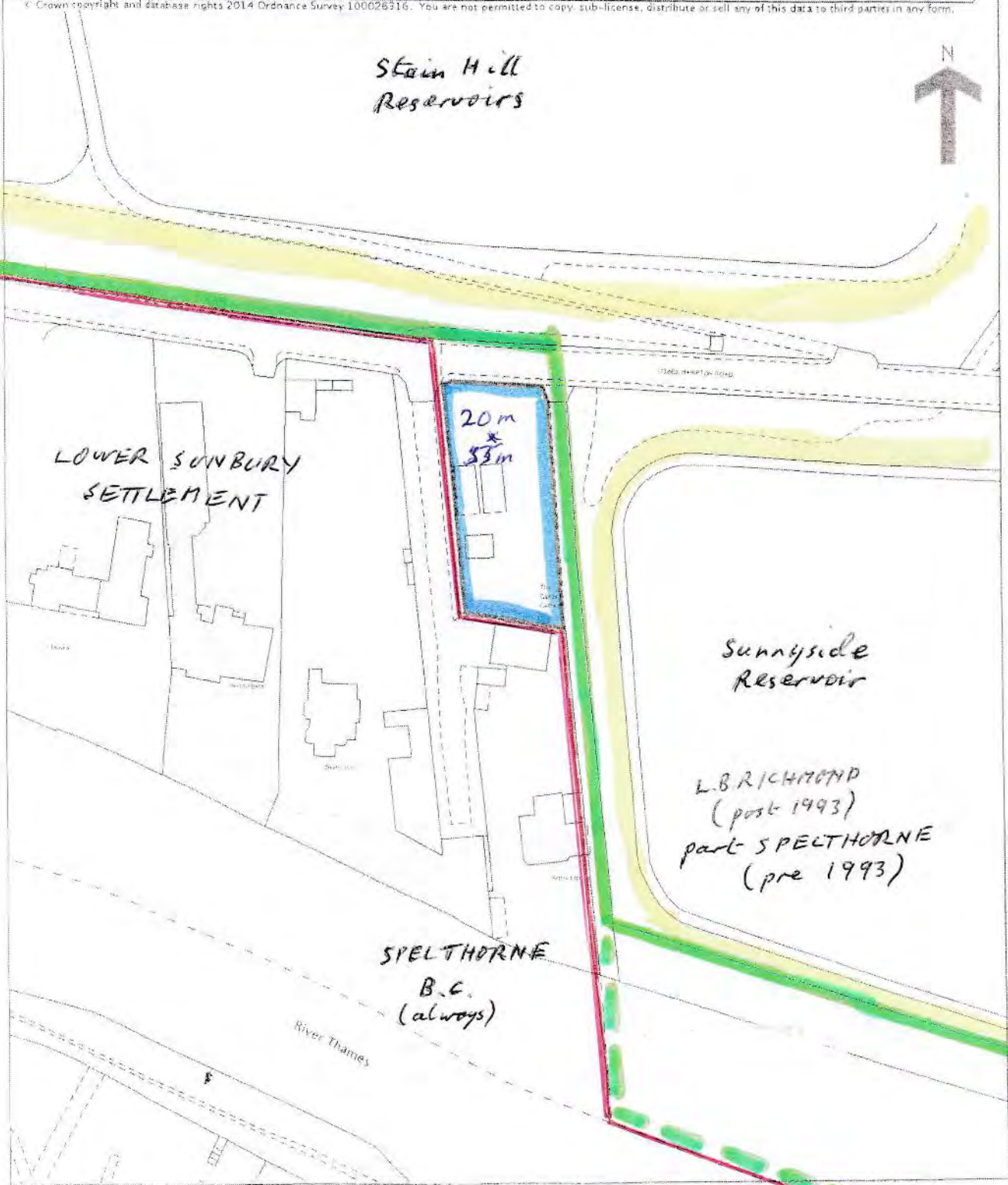
Land Registry  
Official copy of  
title plan




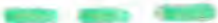
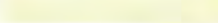
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Ordnance Survey map reference TQ1269SE  
Scale 1:1250  
Administrative area Richmond upon Thames



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Stain Hill  
Reservoirs



-  My Land
-  Post 1993 ADMIN. boundary
-  G.B. boundary (as 1991)
-  G.B. extension 1996
-  Reservoir Embankments

This official copy is incomplete without the preceding notice page.

# Appendix 1 -

Extract from *MOL Land Review*  
(2021) p.115-117



# Parcel: Kneller Chase Bridge

**Number:** 36    **Area (ha):** 18.69    **Place:** Whitton & Heathfield



### Legend



Parcel map



View facing north from B361 along the southern boundary, with views of open lawn and housing.



View facing north east from the southern boundary, with views into private gardens from the public highway of The Avenue.



View facing north from B361 along the southern boundary, with views of Kneller Hall grounds including open lawn, trees along boundaries and associated structures in the background.



## Boundary Assessment

### London Plan Boundary Criterion: ‘Clearly, using physical features that are readily recognisable and likely to be permanent’

The western part of the parcel is bound by development on an Army Barracks. The western part of the parcel to the north is bound by regular backs of residential properties along Amberside Close, tennis courts. The Duke of Cambridge Close bounds the western part of the parcel to the east, Spray Lane bounds the westernmost part of the eastern part of the parcel. The Duke of Northumberland River bounds the parcel to the east with Whitton Dene and regular backs of residential properties bounding the eastern part of the parcel to the north along Queensbridge Park.

### Assessment of parcel against London Plan MOL criteria

#### MOL assessment summary

	Criterion 1	Criterion 2	Criterion 3	Criterion 4	Overall Rating
<b>MOL Parcel score</b>	<b>3</b>	<b>2</b>	<b>2</b>	<b>3</b>	<b>3</b>

\* Mostly inaccessible land and therefore assessment based on aerial photography and views from public highways.

### London Plan MOL Criterion 1: ‘Contributes to the physical structure of London by being clearly distinguishable from the built-up area’

Built development is notable within the eastern of the parcel which contains Chase Bridge Primary School and hard standing to the east of the Duke of Northumberland River associated with Twickenham Stadium. Elsewhere a small number of minor buildings provide minimal urban influences.

Boundaries are mixed. A continuous tree line along northern and southern boundaries screen adjacent development well. The eastern edge is dominated by hard standing, with no identifiable boundary features and has open views of the directly adjacent Twickenham Stadium, resulting in no sense of openness. To the west the parcel is bound by multiple buildings with little screening, providing localised urbanising influences. Housing central but outside of the parcel (Duke of Cambridge Road), is has a mainly continuous tree line/ woodland on all sides, likely to screen the development on other areas of the parcel.

Open flat lawn with mature trees/ woodland along boundaries defines most of the parcel, with topographic change only at the Duke of Northumberland's River, therefore landscape structure is fairly weak. As built development is generally absent across most of the parcel, which is a fairly large open space contributing to separating the urban areas of Twickenham to the east and Whitton/ Hounslow to the west, it contributes to structure of London and therefore the parcel scores moderate (3) for criterion 1.

### London Plan MOL Criterion 2: ‘Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London’

The parcel provides school grounds for recreation and playing fields for local sports. The parcel also provides army barrack grounds and some playing facilities were visible based on views from a public highway. The path along the Duke of Northumberland's River provides the only publicly accessible part of the parcel, offering informal recreation. As the parcel provides local recreational and sport facilities, it scores weak-moderate (2) for criterion 2.

### London Plan MOL Criterion 3: ‘Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value’

The river section of the parcel is designated as a SINC (borough) and OSNI including a valued green corridor at the Duke of Northumberland's River. It contains a small part of the signposted Duke's River Walk, a local recreational route. The western section lies within an Archaeological Priority Area. As the parcel has local historic, biodiversity and recreational value, it scores weak-moderate (2) for criterion 3.

---

**London Plan MOL Criterion 4: 'Forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria'**

---

The parcel meets criterion 1. The fairly large green space and the Duke of Northumberland river corridor contribute to an important local wildlife corridor. It offers good connectivity north to south through two PRowS, including the signposted Duke's River Walk along the river, however the rest of the parcel is private therefore overall it has fragmented accessibility. Hard standing east of the river associated with Twickenham Station is likely to provide no wildlife value. As the parcel has fragmented access for people and is likely to provide a small contribution to a wildlife corridor along a local river, it scores moderate (3) for criterion 4.

### Conclusion

---

**Overall comment**

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Overall the parcel fulfils its role for MOL purposes, meeting criteria 1 and 4. However, the eastern edge of the parcel is developed and does not meet the MOL criteria.

### Strategy and Recommendations

---

	<b>Conserve</b>	<b>Enhance</b>	<b>Restore</b>	<b>Review</b>	
--	-----------------	----------------	----------------	---------------	--

---

The eastern edge of the parcel, hard standing associated with Twickenham Stadium, meets none of the MOL criteria and it is recommended that its MOL status is considered further.

Appendix 2 -  
Photographs showing how  
eastern strip of MOL is used on  
Match Days & Location map



View 1A



View 2A





View 3A



View 4A





View 5A



View 6A



View 7A

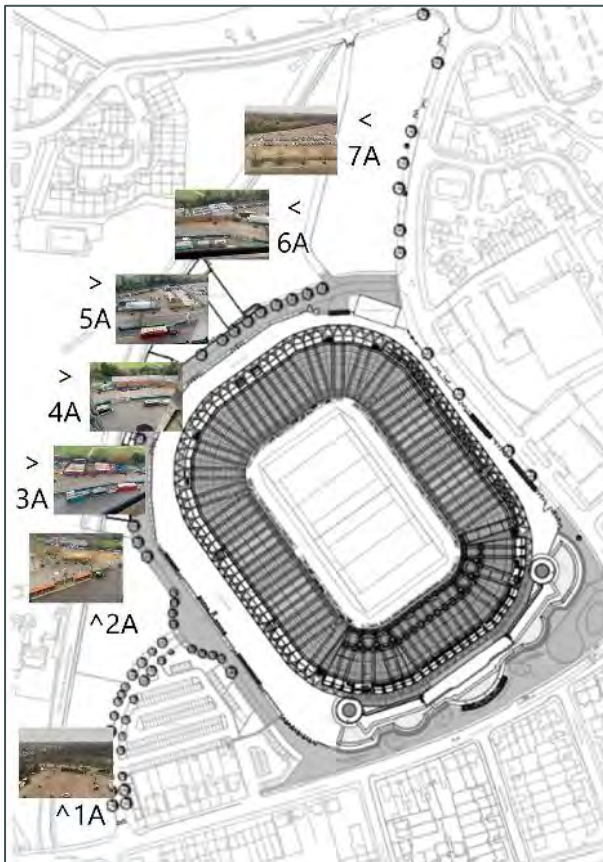


Photo location map (left) and MOL boundary (right)



DATED 16/07 2000

LONGFORD RIVER

SECRETARY OF STATE FOR CULTURE MEDIA AND SPORT

- and -

---

**LICENCE**

- in respect of -

encroachments/freebord in connection with the Longford River  
in the London Borough of Richmond Upon Thames

---

THE ROYAL PARKS AGENCY

REF: 3/2/0112

**THIS LICENCE** made the 4th day of June 2001 **BETWEEN**

(1) **THE SECRETARY FOR CULTURE MEDIA AND SPORT** for and on behalf of Her Majesty of the one part and

(2) **Jeffrey Ian Doble and Carol Dawn Doble** both of 141 Uxbridge Road, Hampton of the other part

**WITNESSES** as follows:

## **1 DEFINITIONS**

In this Agreement

1.1 where the context so admits:

1.1.1 "the Secretary of State" means the Secretary of State for Culture Media and Sport and includes the officer or officers for the time being of Her Majesty or Her Successors

1.1.2 "the Licensee" means the second party to this Agreement

1.1.3 "the Park" means Her Majesty's Royal Demesne of Hampton Court of which the Longford River forms part

1.1.4 "the Freebord" means that part of the freebord of the park which is shown coloured pink on the Plan

1.1.5 "the Premises" means the freehold premises known as 141 Uxbridge Road, Hampton in the London Borough of Richmond Upon Thames shown coloured blue on the Plan.

1.1.6 "the Encroachments" means (if any)

1.1.7 "the Plan" means the plan attached to this Agreement

1.2 Where the Licensee for the time being is two or more persons obligations expressed to be made by or with the Licensee are deemed to be made by or with such persons jointly and severally

1.3 Words importing one gender include all other genders and words importing the singular include the plural and vice versa

1.4 Any obligation on the part of the Licensee not to do an act or thing shall be deemed to include an obligation not to permit or suffer such act or thing to be done by any other person

1.5 Any reference to a specific statute or Act of Parliament includes any statutory extension or modification amendment or re-enactment of such statute and any regulations or orders made under such statute

1.6 The clause and paragraph headings do not form part of this Agreement and shall not be taken into account in its construction or interpretation

## **2 LICENCE**

The Secretary of State so far as he lawfully can or may but not further or otherwise and so long as the Licensee observes and performs the obligations and agreements on his part herein contained **GRANTS** to the Licensee **LICENCE** during the pleasure of Her Majesty and Her Successors to occupy and use the Freebord and to maintain and use the encroachments

## **3 LICENSEES'S OBLIGATIONS**

The Licensee hereby undertakes and agrees with the Secretary of State as follows:

- 3.1 To pay the Secretary of State in advance on the 4<sup>th</sup> of May in every year during the continuance of this Licence the sum of £141.00 as an acknowledgement for the privileges hereby granted the first of such payments having become due on the 4<sup>th</sup> of May 2001.
- 3.2 At all times during the continuance of this Licence to keep the encroachments if any as a whole in good repair order and condition to the satisfaction of the Secretary of State and so that the same shall not be or become a nuisance or annoyance to Her Majesty or her Successors or the Secretary of State or the owners or occupiers of adjoining property
- 3.3 Whenever this Licence shall be revoked or determined as hereinafter provided to remove the encroachments and to restore and reinstate the surface of the Freebord to its former state and condition to the satisfaction in all respects of the Secretary of State and if the Licensee shall make default in so doing it shall be lawful for the Secretary of State to do all such things as shall be necessary to effect such removal restoration and reinstatement and the Licensee shall on demand pay to the Secretary of State an amount equal to the cost reasonably incurred by the Secretary of State in effecting such removal restoration and reinstatement
- 3.4 To permit the Secretary of State and his agents servants workmen or nominees with or without vehicles at any time or times to enter upon the said premises and (if necessary) for the purpose of (i) inspecting cleaning and clearing the River and repairing the banks thereof (ii) ascertaining whether the obligations of the Licensee in relation to this Licence have been duly fulfilled and (iii) and other reasonable purpose connected with the encroachments the Freebord and the river
- 3.5 That no alteration or addition whatsoever shall be made to the encroachments which will in the opinion of the Secretary of State prejudicially affect the amenities of the Freebord without the previous consent in writing of the Secretary of State and to observe and perform the terms of such consent if given.
- 3.6 Not to carry out or permit or suffer to be carried out any building or other works which may cause damage to the freebord and to make good any damage caused to the entire satisfaction of the Secretary of State
- 3.7 To keep the Freebord in good order and condition as a garden laid to lawn with flower beds or in a natural state to the reasonable satisfaction of the Secretary of State provided Always that no trees are to be planted in the Freebord and no shrubs are to be planted in the Freebord or to cultivate it within four feet from the River.
- 3.8 That neither the Freebord nor any part thereof shall be used or enjoyed by any person other than the occupiers of the premises including the family and servants of such occupiers and shall not be used for any purpose whatsoever other than: -
  - 3.8.1 as a garden and
  - 3.8.2 in such manner as shall not cause any nuisance or annoyance thereon and
  - 3.8.3 that (except as herein provided) no structure or thing (including without prejudice to the generality of the foregoing any services patio pathway storage shed or greenhouse for any purpose) whatsoever shall be constructed erected or placed on or under such land or any part thereof so that the Freebord and every part thereof shall be kept clear and open for such use as a garden as hereinbefore provided at all times
- 3.9 Not to permit any animals (other than normal household pets) to enter the Premises and not to form any cesspool thereon or create or cause any nuisance or annoyance thereon or do any act whereby the water of the River may be polluted.
- 3.10 Not to permit any grazing on the freebord



- 3.11 Not to dump any garden or domestic refuse on the freebord.
- 3.12 Not to cover infill or otherwise impede the flow of any interceptor ditch or to remove any existing trees or shrubs or any other features which may be of ecological importance including rushes reeds etc which may be growing on the edge of the said River or within any interceptor ditch.
- 3.13 Not to place any erection or fence or create any obstruction on the Premises or build any patios or jetties and not to take or take or use or permit or suffer to be taken or used any water from the River without the consent in writing of the Secretary of State and to observe any terms imposed by the Secretary of State as condition of such consent.
- 3.14 Not to use or permit the River or the Premises to be used for or in connection with fishing boating or bathing.
- 3.15 To use the said piece of Freebord for the purposes of quiet recreation only.
- 3.16 To be responsible for and to make good or pay compensation for any damage or injury (including injury resulting in death) to any person or property arising by reason of or which would have not occurred but for this Licence or anything done or purported to be done hereunder and to keep the Crown and the Secretary of State fully and effectually indemnified against all costs charges expenses actions claims and demands in respect of any such damage or injury And this indemnity shall extend and apply to all sums paid by the Crown or the Secretary of State so as to indemnify their servants against any claim made against them in respect of any such damage or injury and also to all sums payable (whether or not the payment thereof is legally enforceable) under any Statute Order regulation Instruction Warrant or other Government provision to any officer servant or agent of the Crown or the personal representatives or dependants of any such person in respect of any such damage or injury PROVIDED ALWAYS that the Secretary of State shall be at liberty to settle as he may think fit after consultation with the Licensee any such actions claims or demands by payment of such sum or sums as he in his discretion may consider reasonable and he may in his discretion after giving notice in writing to the Licensee cause any such damage to be made good and the expenses incurred by the Secretary of State in so doing or in making any such payment shall be repaid by the Licensee to the Secretary of State on demand PROVIDED NEVERTHELESS that the Licensee shall not be required to pay by way of indemnity any such sum greater than that which would be reasonably payable in settlement having regard to the circumstances of the case (it being agreed that an amount ascertainable under any Statute Order Regulation Instruction warrant or other Government provision is a sum reasonably so payable) and in particular (where the payment is legally enforceable) to the damages which might be recoverable at common law
- 3.17 Forthwith to effect and maintain an insurance covering all matters which are the subject of the indemnities and undertaking contained in this Licence and such other risks and perils as the Secretary of State shall in his absolute discretion require (subject in all cases to any excesses exclusions and limitations imposed by the insurers or underwriters and except always such risks as cannot reasonably be insured by the Licensee on satisfactory terms or at a reasonable premium or as the insurers or underwriters have refused to insure) in the sum of not less than Million Pounds (£1,000,000 ) in respect of any one incident and unlimited in total PROVIDED THAT nothing in this sub-clause shall be construed as limiting or affecting in any way the liability of the Licensee under any of the indemnities or undertaking entered into or given in this Licence or otherwise
- 3.18 To pay or cause to be paid on demand all premiums and sums of money necessary for the purpose of complying with the covenants set out herein and on demand to produce to the Secretary of State evidence that such policy of insurance remains in force

- 3.19 Not to part with his interest in the Premises or any part of them or let the Premises or any part (and in this sub-clause the expression Licensee expressly includes personal representatives of the Licensee) unless he has first terminated this Licence and removed all the encroachments or has obtained the consent of the Secretary of State who shall be entitled as a condition of giving such consent to require that any successor in title (including any tenant) enters into an Agreement with the Secretary of State on the same or similar terms as this Agreement and thereafter the Secretary of State shall release the Licensee from all further obligations hereunder but without prejudice to any existing rights of action or remedies against the Licensee for any antecedent breach of any of the terms or conditions herein contained  
**PROVIDED THAT : -**
- 3.19.1 if any successor in title of the Licensee (including any tenant) does not enter into such Agreement with the Secretary of State as provided for herein then this Licence shall terminate forthwith and the Secretary of State may require the removal of the encroachments (insofar as they are within or form part of the Freebord) subject to the Licensee being responsible for the costs involved in removing the same and
- 3.19.2 the provisions of this clause shall not imply that the Secretary of State is under any obligation to grant any future Licence and are without prejudice to Clause 4.2 of this Agreement
- 3.20 Immediately upon the sale or disposition of the Premises to inform the estates Manager, The Royal Parks, The Old Police House, Hyde Park, London W2 2UH of the name and address of the purchaser or other disponsee in respect of each and every such sale or disposal
- 3.21 To pay to the Secretary of State a fee of £30.00 plus VAT and any reasonable legal costs incurred in connection with the preparation and completion of this Agreement

#### 4 AGREEMENT AND DECLARATIONS

4.1 The Licensee hereby acknowledges that he has and claims no estate or interest whatsoever in or right over the Freebord or the site of it or any part of it or apart from this Licence any right to maintain the encroachments or any of them or any part of them and that he enjoys the encroachments with the consent of the Secretary of State and shall not by the enjoyment thereof acquire any absolute or indefeasible title or other right to enjoy them or other right thereto

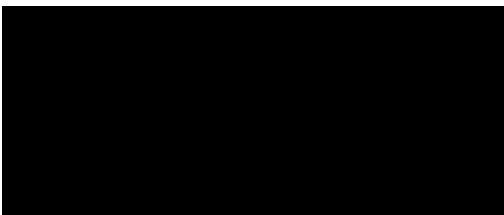
4.2 It shall be lawful

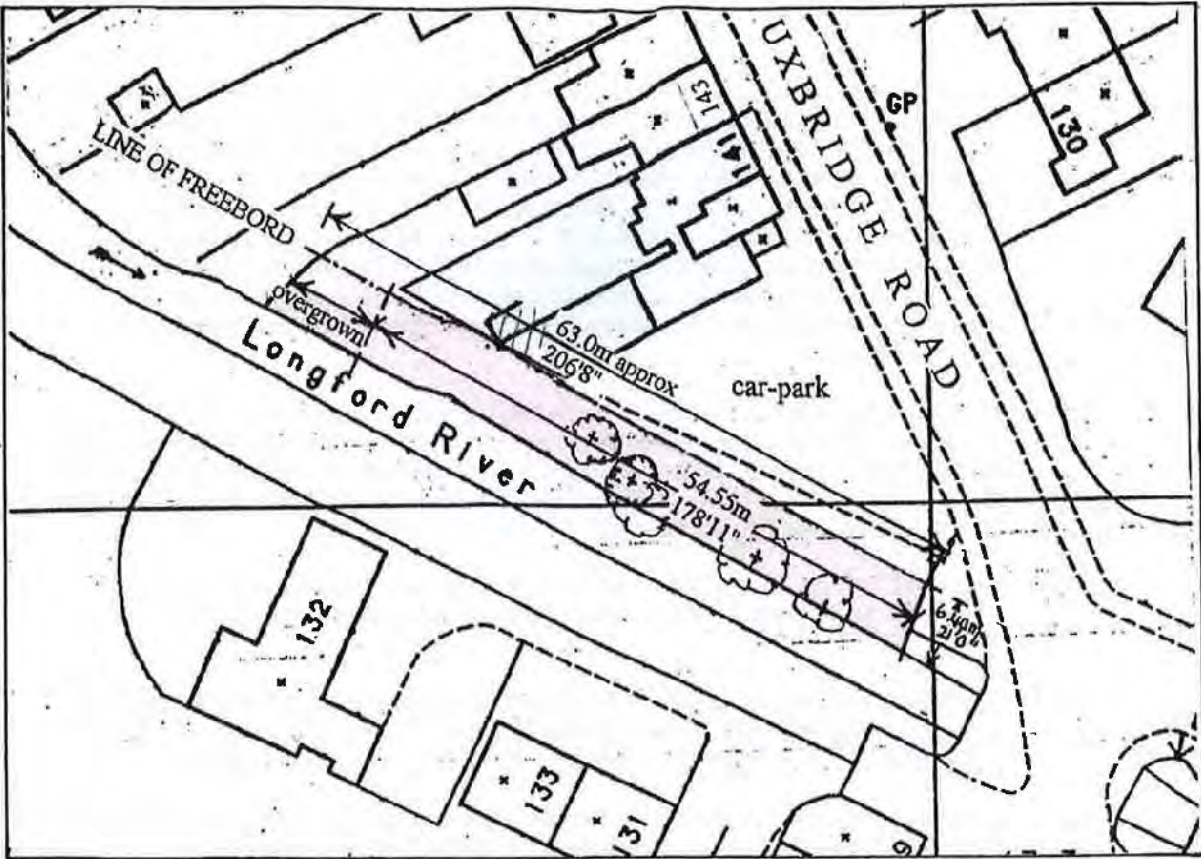
4.2.1 for the Secretary of State at any time to terminate this Licence by giving notice in writing to the Licensee without making any compensation for any outlay made by the Licensee in connection with the Premises or the encroachments and

4.2.2 for the Licensee at any time to terminate this Licence by giving to the Secretary of State not less than one months previous notice in writing that he no longer requires the privileges granted by this Agreement and

4.3 The Licence Fee shall be subject to increase by periodic review

As witness our hand this 16th day of July Two Thousand One








LOCATION PLAN Scale = 1/625



ELEVATION TO THE LONGFORD RIVER  
Scale = 1/200

Freebord land shown thus .....   
 Licensee's property shown thus ...   
 Windows gaining light and air  
 from freebord land ..... 

**FREEBORD**

ESTATE MANAGEMENT SECTION  
 THE ROYAL PARKS  
 THE OLD POLICE HOUSE, HYDE PARK, LONDON W2 2UH.

DRWG No

141 UXBRIDGE ROAD  
 HAMPTON HILL.

**L619**

SURVEYED BY: JA

DRAWN BY : JA

DATE: JANUARY 1995

AMENDED

SCALE: 1/625