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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 | Council's response |
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| | | | Legally compliant | Sound | Complies with the Duty to Co-operate | | | | |
| - | General | | | | | | | | |
| 1 | Elena Mikhaylova | General – cost of Plan and consultation | N o | 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. | Local plans form part of the statutory development plan and Government guidance sets out they must be kept up to date. The Council has responded to a FOI including details of spending, revenue budgets and the consultants involved in preparing technical reports and advice. The Statement of Consultation sets out details of how the consultation at each stage of the Plan's preparation has been undertaken in accordance with the relevant regulations and the Council's Statement of Community Involvement. |
| 2 | Julie Scurr | 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. | | Noted. The NPPF expects a Local Plan to optimise the use of land, expecting an uplift in density of residential development in city and town centres and other locations well served by transport, with the Council's housing target set by the London Plan sets. Paragraph 24.17 in the Plan sets out the impact of development on social infrastructure must be assessed, in part to ensure that there is sufficient capacity; if mitigation is required, planning obligations are one of several means of achieving it. |
| 3 | Mary Stone | 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. | | Support noted. |
| 4 | Solomon Green | 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. | | Support noted. |

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| | | | | | | My comments are few. Probably inappropriate but worth mentioning [See comments 390, 459 and 549] | |
| 5 | Michael Atkins, Port of London Authority (PLA) | Local Plan (general) | Y | Y | Y | <p>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.</p> <p>It is welcomed that proposed amendments to policies 39 (Biodiveristy & Geodiversity), 40 (Rivers and River Corridors) and 41 (Mooring 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.</p> | Support noted. |
| 6 | Mike Corbett, Runnymede Borough Council | General | | | | <p>Thank you for consulting Runnymede Borough Council.</p> <p>We have no comments to make on the Publication Local Plan.</p> | Noted. |
| 7 | Hannah Harris, Royal Borough of Kingston upon Thames | General, Duty to Cooperate | | | | <p>Thank you for the opportunity to submit comments to the London Borough of Richmond upon Thames Publication Version Local Plan Regulation 19 Consultation.</p> <p>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.</p> <p>The Royal Borough of Kingston upon Thames does not wish to comment on the soundness of the Publication Version Local Plan.</p> <p>Both Councils have cooperated on cross boundary and strategic matters during the course of the Local Plan preparation.</p> <p>We welcome the opportunity to continue working cooperatively together through Kingston's Local Plan preparation and going forward.</p> | Noted. |
| 8 | Hannah Bridges, Spelthorne Borough Council | General, Duty to Cooperate | | | | <p>Thank you for consulting Spelthorne Borough Council on the London Borough of Richmond Regulation 19 Local Plan.</p> <p>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]</p> <p><u>Spelthorne Local Plan</u></p> <p>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.</p> <p>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.</p> | Noted. |
| 9 | Tim Brennan, Historic England | Local Plan | | | | <p>London Borough of Richmond – Regulation 19 Consultation on draft Local Plan</p> <p>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.</p> <p>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).</p> <p>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.</p> | Noted. |

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| | | | | | | <p>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.</p> <p>[See other comments 80, 188, 275, 292, 308, 446, and 506]</p> <p>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.</p> | | |
| 10 | Sammantha Rose, National Highways | Local Plan Publication (Regulation 19) | | | | <p>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.</p> <p>National Highways welcomes the opportunity to provide our comments on the Local Plan Publication (Regulation 19) version.</p> <p>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 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. 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> | | Comments noted. The Transport Background Topic Paper sets out the traffic modelling for the Borough for the lifetime of the Plan, and considers the impact on the SRN. See the Statement of Common Ground with National Highways. |
| 11 | Richard Carr, Transport for London (TfL) | Local Plan Publication (Regulation 19) (general comments in relation to the | | | | <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> | | Comments noted. Note support for the 20 minute neighbourhood and focus on active travel and public transport. The Council's response to a comment on the Regulation 18 Plan (comment 46) was that measures to achieve Vision Zero, such |

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| | | vision, transport policies and evidence base) | | | | <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. 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 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.</p> <p>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].</p> <p>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.</p> | | as lowering traffic speeds and targeting road danger reduction, are largely outside of the remit of the Local Plan and therefore it was not considered necessary to reference. It is noted however there is an overlap with designing safe streets, and an Additional Modification to paragraph 4.8 could be considered to reference the Mayor's Vision Zero Strategy. See the Statement of Common Ground with TfL. |
| 12 | Molly Dadswell, Natural England | General | Yes | Yes | Yes | <p>Thank you for your consultation on the above dated 09 June 2023 which was received by Natural England on the same date.</p> <p>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.</p> <p>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.</p> | | Comments noted. |
| - | Jon Rowles | Habitats Regulation Assessment | | | | [See comment 233 in relation to the sustainability report] | | - |
| 13 | James Stevens, Home Builders Federation | Local Plan Publication (Regulation 19) - June 2023 (general) | | | | <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> | | Noted. |

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| 14 | Mark Jopling, Udney Park Playing Fields Trust | 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. | | Comments noted. |
| 15 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green) | Local Plan Publication (Regulation 19) Urban Design Study (2023) | | | | <p>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.</p> <p>BASIS OF OUR RESPONSE</p> <p>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.</p> <p>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.</p> <p>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.</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: 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. [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> | | Comments noted. |
| 16 | Katherine Drew, The Royal Parks | Local Plan Publication (Regulation 19) - June 2023 (general comment in relation to Royal Parks and the Habitats) | | | | <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.</p> <p>[See Appendix 1, along with the Council's Statement of Consultation (June 2023) 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> | | <p>The Council's response to the Royal Parks comment on the Regulation 18 Plan (comment 199) was that the Plan as a whole recognises the importance of the Royal Parks and a number of policies apply to their protection. On that basis a stand-alone Royal Parks policy is not considered necessary.</p> <p>The Council responded to the Royal Parks comment on the Regulation 18 Plan (comment 222) and the HRA was updated</p> |

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| | | Regulation Assessment) | | | | | | | to reflect that the qualifying feature of the Richmond Park SAC has been considered in relation to the points raised. The HRA (April 2023) that accompanied the consultation on the Publication Local Plan will be a submission document. It is expected that the HRA that will form part of the consideration of the soundness and legal compliance of the Plan by the Inspector during the Examination. |
| 17 | Suzanne Parkes, Elmbridge Borough Council | Duty to Cooperate | | | Yes | | <p>Publication Local Plan (Regulation 19) - June 2023</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>Duty to Cooperate</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.</p> <p>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.</p> <p>[See also comments 18, 64, 125, 347, 353, 496, and 528]</p> | | Comments noted. |
| 18 | Suzanne Parkes, Elmbridge Borough Council | On-going collaboration & Statement of Common Ground | | | | | <p>On-going collaboration & Statement of Common Ground</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> | | Noted. |
| 19 | Jonathan Blathwayt, GLA on behalf of Mayor of London | 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, Transport for London (TfL) 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>General conformity</p> <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.</p> <p>[See comments 55, 346, 367, 402, 445, 465, 514, and 521]</p> | | Comments noted. See response to comment 367 in relation to Policy 11, and the Affordable Housing Background Topic Paper and Housing Delivery Background Topic Paper which set out further details. See the Statement of Common Ground with the GLA on behalf of the Mayor of London. |
| 20 | Duncan McKane, London Borough of Hounslow | Local Plan Publication (Regulation 19) - June 2023 (general, Duty to Cooperate) | | | | | <p>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.</p> <p>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.</p> <p>[See comments 82, 219, 348, 375, 403, 414, 447, and 522]</p> | | Comments noted. See response to comment 522 in relation to transport and highways impacts, and the Transport Background Topic Paper sets out the traffic modelling for the Borough for the lifetime of the Plan, and considers the impact on Hounslow. See the Statement of Common Ground with LB of Hounslow. |

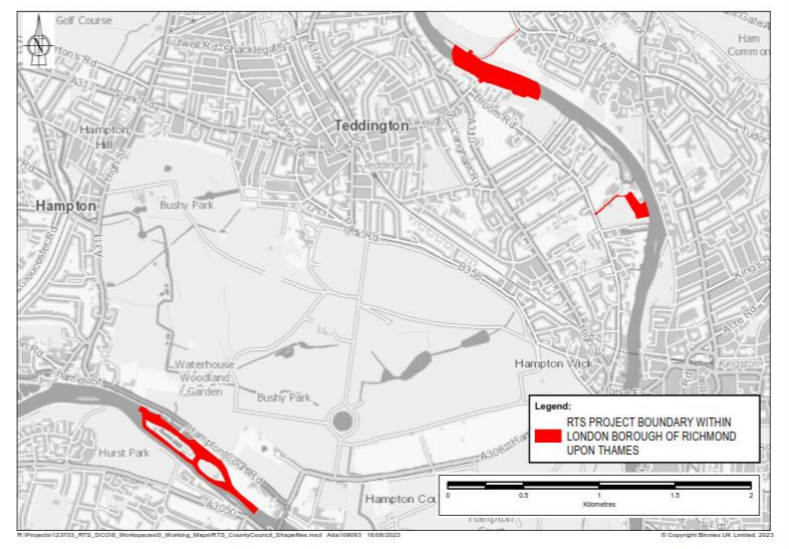
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| | | | | | | | <p>We would welcome the opportunity to engage further on this and other strategic matters through continued duty to cooperate discussions in the coming months. Following this, LBH hope that we can agree positions with LBRuT relating to cross-boundary matters within a Statement of Common Ground at the earliest opportunity.</p> <p>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.</p> | | |
| 21 | Peter Willan and Paul Velluet, Old Deer Park Working Group | Local Plan Publication (Regulation 19) Urban Design Study (2023) | | | | | <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 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.</p> <p>BASIS OF RESPONSE</p> <p>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].</p> <p>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.</p> <p>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.</p> <p>We note and welcome the Council's responses to our representations: 45, 86, 130, 163, 198, 215, 638, 679, 794, 879, 886, 927, 954, 955 and 1013.</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: 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. [See comments 29, 41, 47, 72, 245, 273, 284, 307, 429, 474, 503, and 519 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> | | Comments noted. |
| 22 | Henry Brown (The Planning Lab), Royal Botanic Gardens Kew | Publication Local Plan (including changes to the Policies Map designations) (general) | Yes | No | Yes | Effective; Consistent with national policy | <p>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.</p> <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</p> | | Comments noted. |

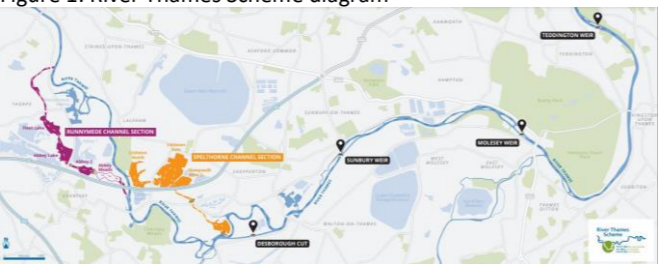
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| | | | | | | <p>amendments are included in this latest draft that align with the suggestions we made in relation to the Regulation 18 version.</p> <p>However, a number of areas of concern remain and RBKG raises these again because we believe these 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"> • The designation of Kew Gardens as an "incremental intensification area" and an "area deficient in public open space" in Policy 2: Spatial Strategy, Managing Change in the Borough. [See comment 69] • Clarification on how the identified views referenced in Policy 31: Views and Vistas have been assessed, and how it is intended to progress supporting policies (specifically, the draft Local Views SPD). [See comment 444] • Amendments to Policy 32: Royal Botanic Gardens, Kew World Heritage Site 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] • Inconsistency in the description of permitted heights set out in Policy 45: Tall and Mid-Rise Building Zones. [See comment 513] <p>RBKG 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), Notting Hill Genesis | Publication Local Plan (general) | N o | N o | N o | <p>Positively Prepared ; Justified; Effective; Consistent with national policy</p> <p>REPRESENTATION ON BEHALF OF NOTTING HILL GENESIS TO RICHMOND LOCAL PLAN PUBLICATION (REGULATION 19) CONSULTATION JULY 2023</p> <p>We act on behalf of our client Notting Hill Genesis, owners of the St Clare Business Park, Windmill Road, Hampton.</p> <p>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"> • Policy 4 Minimising Greenhouse gas Emissions and Promoting Energy Efficiency (Strategic Policy) [See comment 321] • Policy 6 Sustainability Construction Standards [See comment 328] • Policy 10 New Housing (Strategic Policy) [See comment 355] • Policy 11 Affordable Housing (Strategic Policy) [See comment 368] • Policy 21 Protecting the Local Economy (Strategic Policy) [See comment 406] • Policy 24 Industrial Land [See comment 412] • Policy 25 Affordable, Flexible and Managed Workspace - subject to viability [See comment 413] • Policy 39 Biodiversity and Geodiversity [See comment 486] • Policy 45 Tall and Mid-Rise Building Zones [See comment 517] <p>Conclusion and Recommendation</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.</p> <p>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> | | <p>Comments noted.</p> <p>Note Planning Committee on 11 October 2023 resolved to approve 22/2204/FUL subject to a legal agreement.</p> |
| 24 | Tim Catchpole, Mortlake with East Sheen Society | 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>Comments noted.</p> <p>In relation to traffic modelling evidence, the Transport Background Topic Paper provides more details on the impact of development on the transport system. Note in relation to mapping, Policies Map designations can only apply within the borough boundary, and generally beyond</p> |

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| | | | | | <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"> <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. <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. <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. <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. <p>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]</p> | <p>the borough is shown as ‘greyed out’ where it aids the visual presentation of a map or diagram. Mapping of the spatial strategy does show wider context such as transport corridors continuing beyond the borough where it is more relevant to the strategic nature of the illustration. The Local Plan is a planning policy document that guides decision makers in assessing planning applications; it would be for the benefits and harm of any proposal to form part of the planning balance, having regard to all the circumstances in the case.</p> |
| 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>Environment Agency Position 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.</p> <p>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.</p> <p>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"> Section 1 – Environmental issues & opportunities Section 2 – Site allocations Section 3 – Sustainability Appraisal & Sequential Test Report <p>Please do not hesitate to contact us should you have any queries.</p> | <p>Comments noted.</p> |

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| 26 | Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common | General | | | | <p>Summary</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"> 1. Section 23 - Reducing the need to travel and improving the choices for more sustainable travel; 2. Section 17 - Delivering new homes and an affordable borough for all; 3. Section 24 - Securing new social and community infrastructure to support a growing population; and 4. Section 13 - Place Based Strategy for Mortlake & East Sheen. <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 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.</p> <p>As a result, I would respectfully ask the Planning Inspector to consider if:</p> <ul style="list-style-type: none"> • 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. • The potential conflict of interest referred to in section 17, is consistent with national policy as required by NPPF policy 35d. • The amendments to the Education and Training Policy are consistent with national policy as required by NPPF policy 35d. • 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>[See comments 76, 288, 299, 356, 364, 373, 379, 530, and 547]</p> | | The Local Plan takes into account the number of large sites in the east of the borough (Site Allocations for Sainsburys on the Lower Richmond Road, Stag Brewery, Barnes Hospital are rolled forward and updated from the adopted Local Plan, and Kew Retail Park has been added to the emerging Plan) and is accompanied by a proportionate evidence base. The Housing Delivery paper sets out information on housing delivery including the latest trajectory, and the Transport Background Topic Paper provides more details on the impact of development on the transport system. |
| 27 | Martha Bailey, London Historic Parks and Gardens Trust | General | | | | <p>I write as a member of the Planning & Conservation Working Group of the London Historic Parks & Gardens Trust (trading as London Parks & 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.</p> <p>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 LPG's Inventory of Historic Spaces 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, which can be accessed here.</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.</p> <p>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> | | Comments noted. |
| 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"> - 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. - 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 away 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. - 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. - 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 | | The Statement of Consultation sets out details of how the consultation at each stage of the Plan's preparation has been undertaken in accordance with the relevant regulations and the Council's Statement of Community Involvement. The online policies map was available from 20 June 2023; while interactive online mapping allows users to toggle layers on and off and see what applies in a particular location, all the Policies Map designation changes are clearly set out within the Publication Local Plan (the orange boxes). The Local Government Association (LGA) Corporate Peer Challenge (CPC) is a forward-looking review; the report was published in June 2023 and an action plan is taking forward aspects of organisational |

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| | | | | | | | https://www.local.gov.uk/our-support/council-assurance-and-peer-support/peer-challenges-we-offer/corporate-peer-challenge-82 | | change and may be relevant to future plan-making. |
| 29 | Peter Willan and Paul Velluet, Old Deer Park Working Group | General (in relation to title of the Plan, page numbers) | | | | | [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... [See the Council's Statement of Consultation (June 2023) 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] | | Page numbers were added to the Regulation 19 Plan. The Council's response to the comment on the Regulation 18 Plan (comment 212) was that the shortened reference to the Richmond Local Plan is acceptable; it is clearly a boroughwide plan and there is no amendment necessary to the title. |
| 30 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green) | General (in relation to title of the Plan, page numbers) | | | | | [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... [See the Council's Statement of Consultation (June 2023) 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] | | See response to comment 29. |
| - | Introduction | | | | | | | | |
| 31 | Katherine Drew, The Royal Parks | 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 Council's Statement of Consultation (June 2023) 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] | | The Council's response to the Royal Park's comment on the Regulation 18 Plan (comment 231) was that this section of the introduction recognises the general importance of multi-functional open space, and the Biodiversity Action Plan recognises threats, so Policy 39 and other actions the Council can take forward can address any threats. As paragraph 2.37 notes the pressures, no changes to the Plan are considered necessary. |
| 32 | James Stevens, Home Builders Federation | 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. | | The Plan looks ahead to 15 years from the date of its adoption, however the timescales to the plan-making process and final adoption date cannot be confirmed at this stage. See also response to comment 354 which confirms further details around periods for housing delivery. |
| 33 | Joe Cunnane (Cunnane Town Planning), Hampton Hill Residents | 2. Introduction, Setting the Scene (Page 5) | Y es | N o | N o | Positively Prepared ; Justified; Effective; Consistent with national policy | On Page 5. 2 Introduction Setting the Scene 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 Prior indications of view of a matter not to amount to predetermination etc (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— (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. 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: <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> | 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. | As set out in Planning Practice Guidance, at the point of making a decision, members must carefully consider all the evidence that is put before them and be prepared to modify or change their initial view in the light of the arguments and evidence presented. Then they must make their final decision at the meeting with an open mind based on all the evidence. The purpose of the Local Plan is not to set out details of the decision-making process and therefore it is not considered necessary for this to be referenced. |

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| 34 | John Webb | 2. Introduction (page 5 para 2.5) | | N | N | Positively Prepared ; Justified; Consistent with national policy | <p>On Page 5. 2 Introduction Setting the Scene 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] 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. Also Part 1 Chapter 6 Predetermination emphasises: Prior indications of view of a matter not to amount to predetermination etc (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— (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. 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: <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> [See also comment 107 in relation to St Clare mid-rise zone]</p> | <p>1) 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.</p> | See response to comment 33. |
| 35 | Jon Rowles | Twickenham Area Action Plan (2013) – guidance for Twickenham | | | | <p>- 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.</p> | | <p>The Council's Village Planning programme that was undertaken between 2013 and 2018 has ended. There is now a Place-Based Strategy for Twickenham, Strawberry Hill & St Margarets which takes forward a vision and objectives. The borough-wide characterisation work in the Urban Design Study provides the background against which new development can be balanced with protecting and enhancing what makes Richmond a borough so special. As set out at paragraph 20.5 in the Publication Local Plan, the Council will consider further supplementary planning document(s) or toolkits to inform design expectations, and take into account the forthcoming Levelling Up & Regeneration Act requirement for a design code covering their whole area.</p> | |
| 36 | Zoe Chick, River Thames Scheme | General, Policies Map Changes | | | | <p>Introduction 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. The RTS is making a representation as the following elements of the RTS are proposed within the London Borough of Richmond upon Thames: <ul style="list-style-type: none"> • 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</p> | <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]</p>  | <p>The Policies Map illustrates the spatial policies in the Plan, there is not an opportunity to add upgrades that are not connected to designations or allocations in the Plan. It is not considered necessary to map infrastructure projects that do not require land to be safeguarded. A map of the RTS scheme has been added in the update to the Council's Infrastructure Delivery Plan.</p> | |

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| | | | | | <p>encouraging inclusive economic growth, increasing biodiversity and responding to the dual challenges of climate change and nature recovery.</p> <p>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.</p> <p>As an integrated Scheme, the RTS will deliver:</p> <ul style="list-style-type: none"> • 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. <p>Figure 1 below presents the current proposed location of the new river channel and the weir capacity improvements.</p> <p>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.</p> <p>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.</p> <p>Figure 1: River Thames Scheme diagram</p>  <p>[See comments 70, 313 and 335 on Policies 2, 3, and 8]</p> | |
| 37 | Rachel Holmes, Environment Agency | Sustainability Appraisal & Sequential Test Report | | | <p>Section 3 – Sustainability Appraisal & Sequential Test Report</p> <p>We welcome to amendments to the summary section to reference the natural environmental features raised as requested in our response.</p> <p>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 recommendations to ensure development is designed to minimise and mitigate flood risk where appropriate to ensure it complies with the Local Plan and NPPF.</p> | Comments noted. |
| - | 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).</p> <p>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.</p> | The HRA (April 2023) that accompanied the consultation on the Publication Local Plan will be a submission document. It is expected that the HRA that will form part of the consideration of the soundness and legal compliance of the Plan by the Inspector during the Examination. |

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| | | | | | <p>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. | Further work is now expected in 2024, to inform the Council's Leisure, Sport & Physical Activity. Sport England will be kept up to date. An Additional Modification to paragraph 24.10 could be considered once details are published. |
| 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) | | | [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... [See the Council's Statement of Consultation (June 2023) 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] | The Council's response to Prospect of Richmond's comment on the Regulation 18 Plan (comment 217) was that the Council considers a relevant and up-to-date evidence base, including the Urban Design Study and Open Land Review, underpins the Plan. |
| 41 | Peter Willan and Paul Velluet, Old Deer Park Working Group | General comment (in relation to evidence base) | | | [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... [See the Council's Statement of Consultation (June 2023) 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] | See response to comment 40. |
| 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. | Noted. Policy 1 seeks a mixed pattern of land uses, and adaptable homes, workspaces and social infrastructure are referred to throughout the Plan. Consideration of heating would be through Policies 3 to 5 as part of sustainable construction standards. |
| 43 | Rachel Holmes, Environment Agency | Introduction Chapter 'Responding to a changing environment' (Paragraph 2.33 to 2.40) | | | <p>Section 1 – Environmental Issues & Opportunities</p> <p>This section will cover the following environmental issues and opportunities:</p> <ul style="list-style-type: none"> • Flood Risk • Biodiversity • Water Resources and Quality • Land Contamination • Waste Management <p>1. Flood Risk</p> <p>Introduction Chapter 'Responding to a changing environment' (Paragraph 2.33 to 2.40)</p> | Comments noted. |

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| | | | | | | 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 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 | | Comments noted. The introductory text at paragraph 2.35 is to illustrate the importance of improving energy efficiency as part of the strategic context; Policies in the Plan address retrofit measures and requirements for new build. |
| 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 | | Comments noted. |
| 46 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 241 in relation to Heathrow] | | The Council's response to the ODPWG's comment on the Regulation 18 Plan (comment 241) was that there is not a policy on Heathrow as it lies beyond the borough boundary, and there is a framework for the CAA to assess Airspace Modernisation plans. |
| 47 | Peter Willan and Paul Velluet, Old Deer Park Working Group | 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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 242 in relation to Heathrow] | | See response to comment 46. |
| 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). | | Comments noted. As stated in the Plan, the airport does not lie within the borough boundary and therefore there is not a policy on Heathrow. |
| 49 | Claire Wilmot | Heathrow, Paragraph 2.44 | | | | Completely support this stance | | Support noted. |
| - | | | | | | Vision and Strategic Objectives | | |
| 50 | Luke Burroughs, Transport Trading Limited Properties Limited (TTLP) | 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. Transport Trading Limited Properties Limited (TTLP) 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. Local Plan Strategic Vision 'The best for our borough' 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 | | Support noted. |

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| | | | | | | | 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 "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" . 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, Environment Agency | Vision and Strategic Objectives | | | | | <p>Vision and Strategic Objectives Chapter - Local Plan Strategic Vision 'The best for our borough' 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>Vision and Strategic Objectives Chapter – 'Increasing biodiversity and the quality of our green and blue spaces, and greening the borough' 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>Vision and Strategic Objectives Chapter - Improving design, delivering beautiful buildings and high-quality places 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>Strategic Objectives Responding to the climate emergency and taking action 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. 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 Water Environment Regulations (2017).</p> | | Support noted. In relation to Nature Flood Management (NFM) techniques, the Council's response to the Environment Agency comment on the Regulation 18 Plan (comment 248) was that the strategic objectives refer to protecting and improving the environment of the borough's rivers, and it is considered that re-naturalising and improving water quality would form part of this. An Additional Modification to the Strategic Objective could be considered, see the Statement of Common Ground with the Environment Agency. |
| 52 | Louise Fluker, The Richmond Society | Strategic Vision 'The best for our borough', Para 3.2 | | No | | Justified | 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 | This is a matter of clarification - i.e. the text should refer either to 20 minutes walking or 20 minutes cycling | The Plan recognises there is not a fixed geography to 20-minute neighbourhoods and recognising that not all are able to walk or cycle, Policy 1 emphasises facilitating access to public transport including improving inclusive access. An Additional Modification to the Strategic Vision could be considered, to reference there improving transport options to assist with overcoming barriers for people who experience reduced mobility. |
| 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" | The strategic objective already references "improve connectivity and accessibility for all" which is considered sufficient to recognise this general aspiration. See also response to comment 56. |
| - | | | | | | | Policy 1. Living Locally and the 20-minute neighbourhood (Strategic Policy) | | |
| 54 | Gary Hagreeen | Policy 1 Living Locally and the 20-minute neighbourhood | No | No | No | Justified; Positively Prepared | 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? This should not go ahead without a full public consultation | | Please see the information note following Policy 1 contained in the Regulation 19 Plan: this policy is not about limiting movement. There are some concerns expressed that this concept, along with traffic measures, would restrict journeys. Any such restrictions are beyond the remit of the Local Plan and are not what the policy seeks to do. It is merely seeking to |

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| | | | | | | | | | bring about a pattern of development that makes it an easy choice to 'live locally' and aims to improve, not restrict, accessibility and movement. The Statement of Consultation sets out details of how the consultation at each stage of the Plan's preparation has been undertaken in accordance with the relevant regulations and the Council's Statement of Community Involvement. |
| 55 | Jonathan Blathwayt, GLA on behalf of Mayor of London | Spatial Strategy | | Yes | | | 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. | | Support noted. |
| 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 | 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 | In Policy 1B add at the end " with adequate provision for those with mobility issues" | The Plan recognises that there are people across the Borough with different abilities, and this is reflected throughout in policies such as Policy 1, Policy 19, Policy 47, Policy 48, and Policy 51 which emphasise inclusive mobility and inclusive design. Paragraph 4.9 details some of the ways that considered interventions could be secured through Policy 1 for people with reduced mobility beyond safeguarding blue-badge parking, as this was added in the Regulation 19 Plan in response to the issue being raised in Regulation 18 comments. |
| 57 | Julie Scurr | Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy) | | | | | 20 minute neighbourhood: 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! | | The Local Plan, as a planning policy document, provides support for the identified improvements to the network. Private development will be encouraged to contribute to improving permeability and in the case of major development improvements to cycling routes must be demonstrated. |
| 58 | John Sadler, CPRE London | Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy) | | No | | Positively Prepared ; Justified; Effective | 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 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. <ul style="list-style-type: none"> The policy should be re-defined as meaning 10-minutes walk to and 10-minutes walk from. 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. More is needed on how to link walking / cycling to the rail/tube network i.e. secure cycle storage by all stations. Freeing up 'grey space' / promoting the visitor economy. 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. More could be done generally to link action on car-use to spatial planning (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 - and to include this as a central plank of spatial planning in the borough. | | Paragraph 4.12 indicates that, as a guide, 400-metres is about 5-10 minutes on foot depending on ability. The Plan seeks to take into account the Borough's existing demographics and development patterns, where the majority of the population live within 800m of a defined centre boundary. Provision of shops and services serving essential needs will be focused within the centres, with a limited amount accepted outside these and in line with other policies. The policy requires applicants to demonstrate how their development will contribute to improving walking and cycling links across the wider network including links to public transport and improving permeability through sites. However, the level of detail expected is dependent on the scale of development. |

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| | | | | | | | | | Some of the traffic calming measures proposed are beyond the remit of the Local Plan. |
| 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>Policy 1 (Living Locally)</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> | | Support noted. |
| 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"> 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; 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; 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; offering a high-quality public realm and open spaces; delivering new developments at densities that make local services and transport viable; improving accessibility and connectivity of green infrastructure; facilitating thriving local economies; 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. <p>C. All development (except householder applications for alterations) should:</p> <ol style="list-style-type: none"> demonstrate how they will deliver improvements that support the 'living locally' concept; be permeable by foot and cycle, with good connections and signage to local walking and cycling routes/networks as well as public transport; 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; 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; 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 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. | 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. | The Council consider the Local Plan as a whole has sufficient protection of open space – particularly through Policy 35 and Policy 37 – that ensures open space will be protected and where possible enhanced. B.4 through C.1 will ensure proposals will consider public realm and open space in conjunction with other policies in the Plan to provide protection and deliver enhancements to open space. |
| 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>Policy 1: Living Locally and the 20-minute neighbourhood</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> | | Comments noted |
| 62 | Craig Hatton, Network Rail (Southern) | Policy 1 - Living Locally and the 20-minute | | | | | 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 | | Support noted. Please see response to Comment 525. |

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| | | neighbourhood | | | | <p>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>Policy 1 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, Sport England | Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy), | | | | support, consistent with Sport England's Active Design Guidance | | Support noted. |
| 64 | Suzanne Parkes, Elmbridge Borough Council | Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy), Policy 2 Spatial Strategy: Managing change in the borough (Strategic Policy) | Y | e | s | <p>Policy 1 – Living Locally and the 20-minute neighbourhood Policy 2 – Spatial Strategy: Managing change in the borough</p> <p>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> | | Support noted. |
| 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. | | Paragraph 4.12 indicates that, as a guide, 400-metres is about 5-10 minutes on foot depending on ability. The Plan tries to take into account the Borough's existing demographics and development patterns, where the majority of the population live within 800m of a defined centre boundary. Provision of shops and services serving essential needs will be focused within the centres, with a limited amount accepted |


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| | | | | | | | | | | outside these and in line with other policies. The Plan recognises that there are people across the Borough with different abilities, and this is reflected throughout in policies such as Policy 1, Policy 19, Policy 47, Policy 48, and Policy 51 which emphasise inclusive mobility and inclusive design. Paragraph 4.9 details some of the ways that considered interventions could be secured through Policy 1 for people with reduced mobility, as this was added in the Regulation 19 Plan in response to the issue being raised in Regulation 18 comments. |
| 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. | Please see the information note following Policy 1 contained in the Regulation 19 Plan: this policy is not about limiting movement. There are some concerns expressed that this concept, along with traffic measures, would restrict journeys. Any such restrictions are beyond the remit of the Local Plan and are not what the policy seeks to do. It is merely seeking to bring about a pattern of development that makes it an easy choice to 'live locally' and aims to improve, not restrict, accessibility and movement. | |
| 67 | Gary Hageen | 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 | | Please see the information note following Policy 1 contained in the Regulation 19 Plan: this policy is not about limiting movement. There are some concerns expressed that this concept, along with traffic measures, would restrict journeys. Any such restrictions are beyond the remit of the Local Plan and are not what the policy seeks to do. It is merely seeking to bring about a pattern of development that makes it an easy choice to 'live locally' and aims to improve, not restrict, accessibility and movement. | |
| 68 | Louise Fluker, The Richmond Society | 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" | The Plan recognises that there are people across the Borough with different abilities, and this is reflected throughout in policies such as Policy 1, Policy 19, Policy 47, Policy 48, and Policy 51 which emphasise inclusive mobility and inclusive design. Paragraph 4.9 details some of the ways that considered interventions could be secured through Policy 1 for people with reduced mobility, as this was added in the Regulation 19 Plan in response to the issue being raised in Regulation 18 comments. | |
| - | | | | | | | Policy 2: Spatial Strategy: Managing change in the borough | | | |
| 69 | Henry Brown (The Planning Lab), Royal Botanic Gardens Kew | 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 consulation 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 | See Section 6, above | The Council's response to the comments on the Regulation 18 Plan (comment 134) set out that only sites that are publicly accessible are included in the assessment, so sites that cannot be accessed for free including Kew Gardens are not included (as set out in the Open Space Assessment (2023)). The London Plan (paragraph 4.2.3) | |


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| | | | | | <p>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.</p> <p>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.</p> | | <p>directs incremental intensification to existing residential areas within high Public Transport Accessibility Levels (PTALs) or close to stations or town centres. Both designations cover broad areas, and as considered previously the Plan should be read as a whole and these would not override other policies and evidence base and it is not considered necessary for the supporting text to set out how they would be applied on specific sites. See also response to comment 448.</p> |
| 70 | Zoe Chick, River Thames Scheme | Policy 2 Spatial Strategy: Managing change in the borough | | | <p>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>'</p> | <p>Recommended action: For information only, no action required.</p> | <p>Support noted.</p> |
| 71 | Tim Catchpole, Mortlake with East Sheen Society | Policy 2 Spatial Strategy: Managing change in the borough | | | <p>Policy 2. Spatial Strategy: managing change in the borough (strategic). [See the Council's Statement of Consultation (June 2023) 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.</p> | | <p>The Council's response to the comments on the Regulation 18 Plan (201, 274, 569 and 644) set out that the Council considers it is logical to start the Plan with Policies 1 and 2 and the place-based strategies, and that Richmond Park is recognised as a separate character area but closely ties to areas either side and should not be a Place on its own. The historic approach does not alter the justification for the Council's approach.</p> |
| 72 | Peter Willan and Paul Velluet, Old Deer Park Working Group | General comment (in relation to sustainable growth) | | | <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: 278... [See the Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 278 in relation to sustainable growth]</p> | | <p>The Council's response to the comment on the Regulation 18 Plan (comment 278) was that while population growth has been lower, population change remains a challenge; it was not considered necessary to look at a lower geographic scale e.g. Richmond TC and surrounding area. Populations projections are kept under review, although the GLA's most recent 2021-based projections remain interim projections and do not yet show any changes to the longer-term trends.</p> |
| 73 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of | General comment (in relation to sustainable growth) | | | <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: ... 279... [See the Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 279 in relation to sustainable growth]</p> | | <p>See response to comment 72.</p> |

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| | Richmond (and supported by the Friends of Richmond Green) | | | | | | | | | |
| - | Suzanne Parkes, Elmbridge Borough Council | | | | | | [See comment 64 in relation to Policy 2] | | - | |
| - | | | | | | | Places | | | |
| 74 | James Sheppard (CBRE), LGC LTD | Publication Local Plan Site Allocation omission - LGC site | N | N | o | o | Positively Prepared ; Justified; Effective; Consistent with national policy | <p>Consultation on the Draft Local Plan: Publication Version (Regulation 19) – July 2023 Re: LGC Ltd, Queens Road, Teddington, Middlesex, TW11 0LY</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"> • Approximately 11,000sqm of new employment floorspace • Approximately 279 homes, including up to 50 per cent affordable housing • Active, outward facing site boundaries, integrating the site into the surrounding suburban context whilst enhancing site permeability • Publicly accessible green open space. <p>Principle of Mixed-Use redevelopment</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>Modifications to ensure the Local Plan is Sound and Legally Compliant:</p> <p>1. Mixed-use Site Allocation to be included (employment and residential) for LGC Ltd, Queens Road, Teddington, Middlesex, TW11 0LY</p> <p>- For the reasons as set out above</p> | <p>The Council's response to the respondent's comment on the Regulation 18 Plan (comment 841) states that, whilst noting the aspirations for the site to be redeveloped for mixed use and the at-length pre-application discussions with the Council, a Site Allocation for mixed use is not considered appropriate at this stage given the significance of the site for employment provision in the borough. This is reflected in the Locally Important Industrial Land and Business Park and Key Business Area designations carried forward in the new Local Plan. The justification for the approach is based on the Employment Sites and Premises Needs Assessment evidence base. It is more appropriate for the respondent's aspirations for the site to be considered through the pre-application/application process where the proposed balance of uses can be assessed in detail.</p> <p>See also response to comment 401.</p> |

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| | | | | | <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. 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>Summary</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>It is for the reasons as set out above that we consider the plan to be currently unsound and not legally compliant.</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. [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> | | <p>The Council's response to the respondent's comment on the Regulation 18 Plan (comment 502) stated that Arlington Works is safeguarded as a waste site and there is a need to protect the industrial use. This position was upheld by the Planning Inspector as part of his dismissal of an Appeal (ref. APP/L5810/W/20/3249153) in January 2021 against the refusal of redevelopment of the site for a mixed-use residential/commercial scheme (application ref. 18/2714/FUL). See also response to comment 329.</p> <p>It would thus be inappropriate to identify the site for a residential mixed-use scheme via a Site Allocation. That it has not been allocated does not preclude a development</p> |

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| | | | | | | | proposal from coming forward and being assessed against the relevant policies in the Development Plan. |
| 76 | Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common | Site Allocation omission: Chertsey Court, Lower Richmond Road, Mortlake | | | <p>b. Reasons for the proposed amendments - 2</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 & East Sheen]</p> | <p>a. Local Plan proposed amendments– 2</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> <div data-bbox="1679 743 2415 1860" style="border: 1px solid black; padding: 5px;"> <p>Site Allocation 34a: Chertsey Court, Lower Richmond Road, Mortlake Site Proposal</p> <p><u>Chertsey Court, is a large block of 170 flats in Lower Richmond Road, adjacent to Chalker’s Corner and the A316. 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 the Chertsey Court site for alternate use, for example as a school site, if required.</u></p> <p>Context</p> <p><u>This area as a whole is already 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 has a PTAL rating of 0-1 and 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.</u></p> <p><u>Train services through Mortlake Station, have been reduced as have bus services running through Mortlake. The railway lines and level crossings also form significant barriers to movement given the length of time they are down during the day. The traffic and public transport issues in the area, 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.</u></p> <p><u>One solution is to include the regeneration of Chertsey Court into the development proposals. Using a similar model to the recent precedent at the Ham Close regeneration project, this would also have the added benefit of ensuring residents on this estate were not 'left behind' when the adjacent area is upgraded.</u></p> <p><u>If RHP became the Affordable Homes partner, this would make the regeneration of Chertsey Court easier, as the number of new affordable homes proposed on the STAG site available for decant would be broadly equivalent to the number of homes currently on the Chertsey Court site. Redevelopment would include either:</u></p> <ul style="list-style-type: none"> • <u>Option 1- Current tenants/leaseholders moving to the new development (possibly with a right of return) and once empty, the retrofit/refurbishment (possibly with a further level/block) of the building to ensure compliance with current building standards, including health and safety, fire legislation etc; or</u> • <u>Option 2 - Current tenants/leaseholders moving to the new development, the existing development demolished and either:</u> </div> | <p>Comments noted. This site was not suggested during the 2020 ‘Call for Sites’. Given that the site is adjacent, rather than complementary 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. Furthermore, given the existing site constraints, namely that the site is a dense residential estate with the relatively small open space in the middle, providing amenity space for existing residents, it is not considered a feasible location for the new secondary school and sixth form, which is included as a planning aspiration for the Stag Brewery Site Allocation.</p> <p>To this date, RHP have not engaged with the Council on the Local Plan regarding the Chertsey Court site. Furthermore, Planning Committee resolved to grant planning permission for redevelopment of the Stag Brewery site on 19/07/2023, the site boundary for which matches that of the Site Allocation. It is therefore not considered logical or necessary to amend the Site Allocation boundary.</p> |

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| | | | | | | <ul style="list-style-type: none"> o rebuilt to current building standards, including health and safety, fire legislation etc.; or o used as a school site, if capacity is required, freeing up the STAG site for additional residential homes. The Chertsey Court site would provide an improved location for a school, if required, as this would be adjacent to the A316, and could be accessed directly from the A316, without increasing traffic on the, already very congested, Lower Richmond Road. <p>Currently the age of the building and level of disrepair would appear to have made it difficult to maintain the decent homes standard whilst the flats are occupied. Under both option 1 or 2 additional affordable homes could be added either to the Chertsey Court site or the STAG brewery site.</p> <p>Ownership:(public/private/mixed/unknown)</p> <p>RHP - Housing Association, this scheme will currently only be possible if RHP is chosen as the affordable home's provider on the STAG Brewery site.</p> <p>At the moment, this is out to tender.</p> <p>Expected Implementation Timescale Short- term (0-5 years) Medium (5-10 years) Long (10-15 years)</p> | |
| 77 | John Sadler, CPRE London | Suggested Additional Site Allocations | | | <p>There are a number of car parks in the borough that could be removed and replaced by mixed used developments. Examples include:</p> <ul style="list-style-type: none"> • Richmond Waitrose Carpark: Has 210 parking spaces, which could be used for mixed use redevelopment. • Paradise Road Multi-Storey Carpark: The council owns this site which again is ideal for a mixed-use redevelopment. • Waitrose, West Sheen. The supermarket and the adjacent council car park, library and GP practice are all in a space-inefficient layout.  <ul style="list-style-type: none"> • Tesco, Teddington: The council-owned surface car park at the rear is space inefficient. | | <p>These specific sites were not identified during the 'call for sites' or the plan-making process to indicate they will come forward, although other car parks were suggested (e.g. the Council no longer wants to bring forward Friars Lane Car Park in Richmond for development). The Council-owned car-parks, can be well-used, providing benefits such as for those with restricted mobility to access shops and services, and it is unlikely that other car parks and/or the surrounding areas could accommodate the resulting overspill car parking, were such sites developed, without detriment to highways safety. That a site is not allocated as a Site Allocation does not preclude it from coming forward for redevelopment if circumstances arise.</p> |

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| - | David Wilson, Thames Water | | | | | [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] | | See response to comment 85. |
| - | David Wilson, Thames Water | | | | | [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] | | See response to comment 86. |
| 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. | | <p>Comments noted. 'Places' are based on categorisations and identifications of areas recognised as 'places' by local people as part of the Urban Design Study. Within the 'places' there are also 36 character areas. The method for defining the boundaries of the character areas is set out in the methodology of the Urban Design Study pp. 395-399. This explains that, alongside field work, the following sources of information were used to define the boundaries:</p> <ul style="list-style-type: none"> - The Village Planning Guidance SPDs - Ward boundaries - Existing town centres and areas of regeneration - Conservation Areas <p>Wherever possible, the UDS has followed Conservation Area boundaries and in particular aimed to not split these. In some cases CAs 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. One of the main purposes of defining the character areas is to group together areas of similar character, based on elements such as building types, land use, CAs, urban grain, open spaces, social date and historic mapping.</p> |

| | | | | | | | | | Neighbourhood Plans are expected to be led by communities. The Council encourage community groups to carefully consider what else a neighbourhood development plan could beneficially achieve for their area before starting a formal neighbourhood planning process, given there is extensive Village Planning Guidance covering the borough, as well as Conservation Area Studies. | | | | | | |
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| 79 | Richard Carr, Transport for London (TfL) | All Site Allocations | | | | | | <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>All Site Allocations</td> <td>Not applicable</td> <td>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.</td> </tr> </tbody> </table> | 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. | Comments noted. Officers are conscious that not everyone, such as the average lay person, would be familiar with the PTAL grading system, and thus the subjective grading detail within the Site Allocations text remains a helpful detail, noting too that PTAL scoring is still used by the GLA and within the London Plan, which itself is a grading system, i.e. 0 is 'worst' and 6b is 'best'. It would be expected that the particular highways, transport and access circumstances of each site would be considered in more detail at full planning stage, and that the PTAL reference, as currently worded, does not preclude consideration of individual site circumstances in relation to a proposed development. |
| 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 here), 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 guidance.</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> | General support for the approach noted. The Site Allocations include a context section, which, inter alia, cites all heritage assets on site, as well as a description of the general character and that of the surrounding area. As in previous Plans, the format of the Site Allocations is to set out a high-level vision and broad framework, to allow for details such as capacity to be assessed as part of pre-application and application stage, to allow for flexibility and in particular the London Plan approach to optimise site capacity. The Urban Design Study includes a borough-wide character assessment, but at site level, this would depend on whether there has already been work as part of pre-application or application proposals. Where there are relevant heritage assets, there is reference already within the Site Allocations text to the requirement to protect, and where possible enhance, heritage assets on site, as well as to views and vistas. Any planning application for such sites would require the submission of a Heritage Statement. Further, Policy 44. Design Process of the Local Plan encourages applicants to engage with the Council's pre-application service early in their thinking. It is also a policy requirement to provide 3D digital massing models to enable the Council to assess cumulative impact of development where relevant, and is required for tall building proposals or those located within the protected views and vistas. It is therefore | | | | | | |

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| | | | | | | | | | considered that in-detail assessment of impacts on heritage assessed could be adequately dealt with at pre-application and application stage. See also the responses to comments 188, 275 and 292. An Additional Modification could be considered to refer to early consultation with GLAAS. An Additional Modification could be considered to reference Archaeological Priority Areas, followed by the appropriate zone, throughout all the relevant Site Allocations. |
| 81 | Anna Stott (WSP), Sainsburys Supermarkets Ltd | Site Allocations (Sainsbury's sites) | | No | Justified; Consistent with national policy | <p>REPRESENTATIONS TO THE RICHMOND LOCAL PLAN 'THE BEST OF OUR BOROUGH' (REG. 19) DRAFT FOR CONSULTATION</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>Summary</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> | | Note support for amendments made in response to Regulation 18 consultation comments. See responses to comments 129, 266 and 487. | |
| 82 | Duncan McKane, London Borough of Hounslow | Site Allocations | | | | <p>Site Allocations</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"> • Site Allocation 4: Carpark for Sainsburys, Uxbridge Road, Hampton • Site Allocation 18: Homebase, Twickenham Road, Hanworth (<i>new site allocation</i>) • Site Allocation 21: Kneller Hall, Whitton • Site Allocation 31 Kew Retail Park, Bessant Drive, Kew • Site Allocation 35: Stag Brewery, Lower Richmond Road, Mortlake (<i>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</i>). <p>As discussed at a duty to cooperate meeting between officers from both boroughs on 19th 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> | | Comments noted. As noted neighbouring boroughs are consulted on major planning applications that might have a material impact across borough boundaries, and boroughs can request mitigation where it would pass the tests for such to be acceptable. | |
| 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 & Country Planning (Local Planning) Regulations 2012. These representations are also prepared on behalf of Thames Water as a landowner within the Borough.</p> <p>We are submitting response forms relating to the following policies:</p> <ol style="list-style-type: none"> 1. Policy 6 - Water Efficiency/Climate Change Comments [See comment 325] 2. Policy 8 - Flood Risk & Sustainable Drainage Comments [See comment 333] 3. Policy 9 - Water Resources and Infrastructure [See comment 343] 4. Policy 35 - Green Belt - Hampton Water Treatment Works (WTW) – Proposed Green Belt deletion [See comment 462] | 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] | The Council's response to the respondent's comments on the Regulation 18 Plan (comment 260) set out that the Housing Authority Monitoring Reports set out details about future housing land supply, along with the Infrastructure Delivery Plan. Policy 9 deals with water and sewerage provision, and paragraph 16.98 sets out that developers are encouraged to contact the water/wastewater company as soon as | |

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| | | | | | | <p>5. Policy 39 - Biodiversity - M085 Hampton Water Treatment Works and Reservoirs Nature Conservation Designation [See comment 492]</p> <p>6. Policy 53 - Local Environmental Impacts - Development within the vicinity of Sewage Pumping Stations (and Sewage Works) Works [See comment 552]</p> <p>7. 6 - Place-based Strategy for Hampton & Hampton Hill Site Allocations - Omission Site - Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road [See comment 85]</p> <p>8. 6 - Place-based Strategy for Hampton & Hampton Hill Site Allocations – Omission Site - Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road [See comment 86]</p> <p>9. Draft Allocations - comments in relation to water/wastewater infrastructure.</p> <p>Site Allocations</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"> • What drainage requirements are required on and off site • Clarity on what loading/flow from the development is anticipated • Water supply requirements on and off site <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 https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity</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. 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> | | <p>possible and paragraph 16.99 refers to sewerage/wastewater infrastructure.</p> <p>See also response to comments on Site Allocations. Site-specific matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text.</p> |
| - | | | | | | Place-based Strategy for Hampton & Hampton Hill | | |
| 84 | Katherine Drew, The Royal Parks | Place-based Strategy for Hampton & Hampton Hill Policy - 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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 285 in relation to protection of open space and risks]</p> | | <p>The Council’s response to the respondent’s comments to the Regulation 18 Plan (comment 285) added reference to protection of open space in the place-based policy, and reference to the recreational pressures into the area profile, as already acknowledged elsewhere in the draft Plan.</p> |
| 85 | David Wilson, Thames Water | Place-based Strategy for Hampton & Hampton Hill Site Allocations - Omission Sites | No | Consistent with national policy | <p>1. Land to West of Stain Hill West Reservoir, Hampton Water Treatment Works, Upper Sunbury Road:</p> <p>Site area: approximately 3.58 hectares (refer to enclosed location plan). [See Appendix 2]</p> <p>Current use: vacant land/retained operational land.</p> <p>Proposed use: residential or mixed use development.</p> <p>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.</p> <p>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.</p> | The site should be removed from the Green Belt and allocated for residential development. | <p>The Council’s response to the respondent’s comments to the Regulation 18 Plan (comment 261) referred to the Arup Open Land Review 2021 which assessed the site as part of GA5. This was a Stage 1 MOL assessment which is strategic in nature and did not consider detailed boundary issues or variations within minor areas of a parcel. The assessment acknowledged the different characters within each General Area and considered whether parts of the General Area performed weakly against each NPPF purpose in the case of Green Belt or London Plan criterion in the case of</p> | |

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| | | | | | | <p>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> | | <p>MOL, and should therefore be considered for further assessment as part of a Stage 2 study. Overall, the whole of the GA5 was assessed as performing strongly against NPPF purposes and no weakly performing sub-areas were identified for further assessment.</p> <p>As set out in the assessment, the boundary between GA5 and the Ashford/ Sunbury-on-Thames/ Stanwell large built up area is readily recognisable and likely to be permanent comprising the regular backs of residential properties and gardens. GA5 provides a barrier to the outward sprawl of the large built-up areas. GA5 forms the entire gap between Hampton Village, Molesey and Sunbury-on-Thames and provides a physical and visual buffer to the merging of settlements.</p> |
| 86 | David Wilson, Thames Water | Place-based Strategy for Hampton & Hampton Hill Site Allocations - Omission Sites | No | Consistent with national policy | <p>2. Hydes Field, Land to North of Hampton Water Treatment Works, Upper Sunbury Road: (refer to enclosed location plan). [See Appendix 2]</p> <p>Current use: retained operational land and 3rd party leases</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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> | <p>Allocate the site as a future infrastructure development site, with its use defined as for water and / or wastewater infrastructure provisions.</p> | <p>The Council's response to the respondent's comments to the Regulation 18 Plan (comment 261) referred to the Arup Open Land Review 2021 which assessed the site as part of GA4. This was a Stage 1 MOL assessment which is strategic in nature and did not consider detailed boundary issues or variations within minor areas of a parcel. The assessment acknowledged the different characters within each General Area and considered whether parts of the General Area performed weakly against each NPPF purpose in the case of Green Belt or London Plan criterion in the case of MOL, and should therefore be considered for further assessment as part of a Stage 2 study. Overall, the whole of the GA4 was assessed as performing strongly against NPPF purposes and no weakly performing sub-areas were identified for further assessment.</p> <p>As set out in the assessment, the boundary between GA4 and the Ashford/ Sunbury-on-Thames/ Stanwell large built up area is durable, consisting of Staines Road East and Park Road as well as the backs of residential properties and gardens adjacent to Greater London. GA4 plays a very important role in preventing the sprawl of Ashford/ Sunbury-on-Thames/ Stanwell and Greater London at this location. GA4 forms the entire gap between Sunbury-on-Thames and Hampton Village and it is considered that development in this General Area would lead to the physical and perceptual merging of neighbouring built up areas.</p> <p>Future infrastructure to support growth is addressed as part of the updated Infrastructure Delivery Plan. If any critical projects are brought forward in future for essential infrastructure, these would need to be considered against Policy 35.</p> | |

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| 87 | Gary Hagreen | St Clare mid-rise zone [this point made on response form against Appendix 3] | N o | N o | N o | Positively Prepared ; Justified | <p>Appendix 3 Tall and Mid-Rise Building Zones</p> <p>St Clare (Hampton Hill): Mid-Rise Building Zone</p> <p>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??</p> <p>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.</p> <p>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 | <p>Objection noted. The rationale for a Mid-Rise Building Zone is set out in the Urban Design Study. The Urban Design Study has followed a well-established methodology, and the findings of the characterisation study were used to identify capacity for growth and an overall development strategy, with the broad areas for tall and mid-rise buildings.</p> <p>The Urban Design Study sets out the opportunity in the mid-rise zone is for a comprehensive approach to redevelopment, with potential on a limited part of the site for 5 storeys subject to the appropriate design. The character area guidance for Hampton Hill Residential sets out that any new taller elements should respect existing character, have design elegance and quality that marks them as landmarks; any height above 4 storeys should be stepped back.</p> <p>Note Planning Committee on 11 October 2023 resolved to approve 22/2204/FUL subject to a legal agreement.</p> |
| 88 | Alison Barker | St Clare mid-rise zone [this point made on response form against Appendix 3] | N o | N o | N o | Positively Prepared ; Justified | <p>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.</p> <p>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.</p> | 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 | Objection noted. See response to comment 87. |
| 89 | Heather Ayres | St Clare mid-rise zone | N o | N o | N o | Positively Prepared ; Justified | <p>Page numbers Pages 29 - 31 and 413 - 416</p> <p>Policy no/name Appendix 3 Tall and mid-rise building zones</p> <p>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 & 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. | Objection noted. See response to comment 87. |
| 90 | Katie Sullivan | St Clare mid-rise zone [this point made on response form against Appendix 3] | N o | N o | N o | Positively Prepared ; Justified | <p>Page numbers 29-31 and 413-416. Policy number/name Appendix 3 tall and mid rise building zones</p> <p>Page 29 relating to the Place Based strategy for Hampton and Hampton Hill</p> <p>Map of St Clare's - mid rise building zone appropriate height - 5 storeys (15m)</p> <p>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 rescourse to tall buildings.</p> <p>Why then at Appendix 3 do you circumvent this by saying that the St Clare's development is an appropriate height at 5 metres.</p> <p>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.</p> | As per the above, please remove Appendix 3 and the reference to 5 storeys being appropriate for the St Clare's development. | Objection noted. See response to comment 87. |

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| | | | | | | 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. | | |
| 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. | Objection noted. See response to comment 87. |
| 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 | Objection noted. See response to comment 87. |
| 93 | Christine Palmer | 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) 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. 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. [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 | 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. | Objection noted. See response to comment 87. |
| 94 | Roger Hitchman | 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, 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 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. | Objection noted. See response to comment 87. |

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| | | | | | | 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. | | |
| 95 | Martha Robinson | 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) 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. | 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. | Objection noted. See response to comment 87. |
| 96 | Ian Donald | 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...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 & 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. 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! | Objection noted. See response to comment 87. |
| 97 | Janet Williams | 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 for 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 consistant 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&3 Storey Victorian Terrace 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 appeal | Objection noted. See response to comment 87. |
| 98 | Robert Harvey | 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. | Objection noted. See response to comment 87. |
| 99 | Ben 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. | Objection noted. See response to comment 87. |

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| 100 | Audrey Donald | 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 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. | Objection noted. See response to comment 87. |
| 101 | Anne Chatterton | 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 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 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. | Objection noted. See response to comment 87. |
| 102 | Anthony Reed | St Clare mid-rise zone | Yes | N | N | Positively Prepared ; Justified | Pages: 29-31; 413 Place-based strategy: Hampton & Hampton Hill Maps: St Clare (Hampton Hill) Mid-Rise Building Zone The "Place-based Strategy for Hampton & Hampton Hill" contains the following statements:- "The busy local centre of Hampton Hill maintains its village character" "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. | Delete the map and statement in Appendix 3 entitled "St Clare (Hampton Hill): Mid-Rise Building Zone Appropriate Height: 5 storeys (15m) ". | Objection noted. See response to comment 87. |
| 103 | Linda Brignall, Hampton Hill Association | St Clare mid-rise zone | N | N | N | 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 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, 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. | Objection noted. See response to comment 87. |
| 104 | Amanda Ribbans | 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 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. | Objection noted. See response to comment 87. |

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| 105 | Denise Donald | 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. | Objection noted. See response to comment 87. |
| 106 | Georgia Ballantine, Hampton Hill Business Association | 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, 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. | 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. | Objection noted. See response to comment 87. |
| 107 | John Webb | Place Based strategy for Hampton and Hampton Hill (p. 29-31) Appendix 3 Tall and Mid-Rise Building Zones (p. 413-416) St Clare (Hampton Hill) Mid-Rise Building Zone | | N o | N o | Positively Prepared ; Justified; Consistent with national policy | On page 29 6 Place-based Strategy for Hampton & Hampton Hill states: Overall strategy p30 : 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. Vision p30: 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. P31 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] | 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 | Objection noted. See response to comment 87. |
| 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. | Objection noted. See response to comment 87. |
| 109 | Jim Simler | Placed-based strategy for Hampton and Hampton Hill, St Clare | | 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 | 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. | Objection noted. See response to comment 87. |

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| | | mid-rise zone | | | | 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. | | |
| 110 | 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. | Objection noted. See response to comment 87. |
| 111 | Paul Stancer | St Clare mid-rise zone | | | | I have been a resident in [Hampton road name removed for data protection] 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 [Hampton road name removed for data protection] 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 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. 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 [removed for data protection] , 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? 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". '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 | | Objection noted. See response to comment 87. |

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| | | | | | | | 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.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. 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 . | | |
| 112 | Robert Kemp | 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 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 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. | 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. | Objection noted. See response to comment 87. |
| 113 | Trevor Staplehurst | St Clare mid-rise zone | | N | N | Positively Prepared ; Justified | Page numbers 29-31 and 413-416; Policy no/name: Tall and mid rise building zones. Place based strategy: Hampton Hill The plan suggests that 5 storey buildings are appropriate for St Clare's site in Hampton Hill. 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. | | Objection noted. See response to comment 87. |
| 114 | Douglas Urquhart | 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 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). In your Overall Strategy for Hampton Hill, it is stated that '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'. 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. | St Clares developmnet 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. | Objection noted. See response to comment 87. |
| 115 | Catherine James | Place-based Strategy for Hampton & Hampton Hill St Clare (Hampton Hill): Mid-Rise Building Zone Appendix 3 Tall and Mid-Rise Building Zones | Yes | N | N | Positively Prepared ; Justified; Effective; Consistent with national policy | [comments made by email and online included in this schedule as one comment] On Page 5. 2 Introduction Setting the Scene 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 Prior indications of view of a matter not to amount to predetermination etc (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— (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. 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: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. On page 29 6 Place-based Strategy for Hampton & Hampton Hill states: | 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. 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 | Comments regarding the decision-making process for planning applications is noted but is not considered relevant to the Local Plan-making process. Objection noted. See response to comment 87. |

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| | | | | | | <p>Overall strategy p30 : 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: 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.</p> <p>P31 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. and at the bottom of P31 it lists: 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." 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.; 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. 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. 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> | | | |
| 116 | Sarah Hitchman | 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 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). 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.</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> | <p>Objection noted. See response to comment 87.</p> |

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| | | | | | | | 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. | Objection noted. See response to comment 87. |
| 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. | | Objection noted. See response to comment 87. |
| 119 | Joe Cunnane (Cunnane Town Planning), Hampton Hill Residents | 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 6 Place-based Strategy for Hampton & Hampton Hill states: Overall strategy p30 : 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. Vision p30: 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. P31 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 junction. and at the bottom of P31 it lists: 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 | Objection noted. See response to comment 87. |

| | | | | | | <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> | | | | | | | | |
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| - | | | | | | Site Allocation 1: Hampton Square, Hampton | | | | | | | | |
| 120 | Richard Carr, Transport for London (TfL) | 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 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’).’ Part L 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. 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.’ Therefore, to be consistent with London Plan Policy T6 the site allocation should be amended as follows: ‘retain minimise car parking provision in line with current 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 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’).’ Part L 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. 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.’ Therefore, to be consistent with London Plan Policy T6 the site allocation should be amended as follows: ‘ retain minimise car parking provision in line with current London Plan standards.’ | | The Council’s response to the respondent’s comment on the Regulation 18 Plan (comment 288) was that the amendment to include reference to adherence to London Plan parking provision standards was considered sufficient to ensure that developers do not seek to maximise parking beyond this, and that it was not considered reasonable to insist on minimisation of parking provision to below London Plan requirements given the low PTAL and lack of CPZ, and as the Site Allocation also seeks any scheme to encourage active travel. |
| 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 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’).’ Part L 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. 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.’ Therefore, to be consistent with London Plan Policy T6 the site allocation should be amended as follows: ‘ retain minimise car parking provision in line with current London Plan standards.’ | | | | | | | | | | | | |
| 121 | David Wilson, Thames Water | Site Allocation 1 Hampton Square, Hampton | | | | <p>Thames Water Site ID 49793</p> <p>Water Response: 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>Waste Response: 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>Additional Comments: To provide a more detailed response we will require information on the scale of development.</p> | | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. | | | | | | |
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| 122 | Kay Collins (Solve Planning), Port Hampton Estates Limited | 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>Site Allocation 2: Platt's Eyot, Hampton</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"> • Under existing land uses this should reflect that the site already has a cottage in residential use • Planning history should reflect that discussions have taken place with the landowner in this section of the policy - <p>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.</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>We note that our comments made to the previous draft of the plan have been incorporated into the text of this allocation.</p> | | <p>An Additional Modification to include reference to the existing single dwelling in the context could be considered.</p> <p>Comments noted regarding the planning history, though this section cites planning applications and there is no current application from the landowner.</p> <p>Comments noted regarding reference to limited vehicular access. The Environment Agency previously raised concerns at Regulation 18 stage (comment 291) regarding any access arrangements should not result in a loss of riparian habitat, flood storage or ability to maintain flood defence assets. The Site Allocation provides a framework to assess any proposals.</p> <p>Support noted.</p> |
| 123 | David Wilson, Thames Water | Site Allocation 2 Platts Eyot, Hampton | | | | <p>Thames Water Site ID 54326 (Reviewed Jan18)</p> <p>Water Response: 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>Waste Response: 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>Additional Comments: To provide a more detailed response we will require information on the scale of development.</p> | | <p>Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions.</p> <p>Matters relating to water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text.</p> |
| 124 | Rachel Holmes, Environment Agency | Site Allocation 2 Platts Eyot, Hampton | | | | <p>Site allocation 2 – Platts Eyot</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.</p> <p>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> | | <p>Support noted.</p> <p>Reference to the Environment Agency's satisfaction, regarding access to the site, is intended to refer to having an acceptable impact on flood defences (noting the Environment Agency's concerns raised on the Regulation 18 Plan - comment 291).</p> |
| 125 | Suzanne Parkes, Elmbridge Borough Council | Site Allocation 2 Platts Eyot, Hampton | | | | <p>Place-based Strategy for Hampton & Hampton Hill</p> <p>Site Allocation 2 – Platts Eyot</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.</p> <p>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>Support noted.</p> <p>The Council's response to comments on the Regulation 18 Plan (comments 291 and 292) was that any future application would be expected to comply with Policy 8, national policy and guidance and the Council's SFRA, and that an assessment of the site's capacity should be made at planning stage. This is considered to provide a policy framework for any</p> |

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| | | | | | | <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. 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> | | proposals to be considered. See the Statement of Common Ground with Elmbridge Borough Council. |
| - | | | | | | Site Allocation 3: Hampton Traffic Unit, 60-68 Station Road, Hampton | | |
| 126 | David Wilson, Thames Water | Site Allocation 3 Hampton Traffic Unit, 60-68 Station Road, Hampton | | | | <p>Thames Water Site ID 62517</p> <p>Water Response: 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>Waste Response: 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>Additional Comments: 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. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes.</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. https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes.</p> | | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| - | | | | | | Site Allocation 4: Car Park for Sainsburys, Uxbridge Road, Hampton | | |
| 127 | David Wilson, Thames Water | Site Allocation 4 Car Park for Sainsburys, Uxbridge Road, Hampton | | | | <p>Thames Water Site ID 75256</p> <p>Water Response: 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>Waste Response: 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</p> | | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to water and wastewater infrastructure would be considered at |

| | | | | | | <p>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>Additional Comments: To provide a more detailed response we will require information on the scale of development.</p> | | <p>application stage and it is not considered necessary to reference these in the Site Allocation text.</p> | | | | | | |
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| 128 | Richard Carr, Transport for London (TfL) | 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 <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> </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 <i>‘Parking provision to London Plan standards is expected to be provided including re-provision for the adjacent supermarket in line with current London Plan standards.’</i></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 <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> | <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 <i>‘Parking provision to London Plan standards is expected to be provided including re-provision for the adjacent supermarket in line with current London Plan standards.’</i></p> <p>We welcome the requirement for rapid charging hubs and/or hydrogen fuelling facilities at the retained petrol station.</p> | | <p>Support noted.</p> <p>An Additional Modification could be considered to ensure consistency with the London Plan, see the Statement of Common Ground with Transport for London.</p> |
| 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 <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> | <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 <i>‘Parking provision to London Plan standards is expected to be provided including re-provision for the adjacent supermarket in line with current London Plan standards.’</i></p> <p>We welcome the requirement for rapid charging hubs and/or hydrogen fuelling facilities at the retained petrol station.</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>Draft Site Allocation 4 - Car Park for Sainsburys, Uxbridge Road, Hampton</p> <p>In our previous Regulation 18 representations we were supportive of the allocation’s removal from MOL land designation and the re-provision 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>Moving forward, the emerging Local Plan for submission should include the following:</p> <ul style="list-style-type: none"> 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. Allocation 4 – Remove reference to 100% affordable housing requirement and replace with affordable housing levels set out in draft policy 11. 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. | <p>The Council’s response to the respondent’s comment on the Regulation 18 Plan (comment 299) was that the 100% affordable housing requirement is justified on grounds of providing an ‘exceptional circumstance’ for the release of the MOL. Comments regarding BNG noted, however the justification for the approach is detailed in the Background Topic Paper on Biodiversity. See also response to comment 487.</p> | | | | | | | |

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| | | | | | | <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 "developed northern tip and inaccessible Longford River corridor offers no open-air facilities".</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 "hard standing in the northern tip is likely to provide no wildlife value".</p> <p>Overall, the Parcel 1 is considered to meet its MOL purposes, but the report says "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".</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. 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. [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> | | |
| 130 | John Sadler, CPRE London | Site Allocation 4 Car Park for Sainsburys, Uxbridge Road, Hampton | | No | Effective | <p>Site Allocation 5: The Uxbridge Road Sainsbury. [now Site Allocation 4]</p> <p>This should be a mixed-use development with no surface car parking which is an inefficient use of space and promotes car use.</p> | | Comments noted. See TfL comment 128 including reference to London Plan Policy T6. |
| - | | | | | | Site Allocation 5: Hampton Telephone Exchange (Molesey Telephone Exchange, 34 High Street, Hampton, TW12 2SJ) | | |
| 131 | David Wilson, Thames Water | Site Allocation 5 Hampton Telephone Exchange | | | | <p>Thames Water Site ID 75258</p> <p>Water Response: 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>Waste Response: 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>Additional Comments: To provide a more detailed response we will require information on the scale of development.</p> | | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| - | | | | | | Place-based Strategy for Teddington & Hampton Wick | | |
| 132 | Peter Thompson, National Physical Laboratory (NPL) | Vision for Teddington and NPL | Yes | Yes | Yes | <p>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.</p> <p>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:</p> <ol style="list-style-type: none"> 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 | | Support and comments noted. Improvements to public transport and promotion of active travel is a central tenet of the Local Plan, and is dealt with under various policies including Policies 1, 2 and 47. |

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| | | | | | | <p>The overall vision for Teddington, 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.</p> <p>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 - 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) 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.</p> <p>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.</p> <p>[See comments 415, 420, 452, 553 and 560 in relation to other parts of the Plan]</p> <p>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.</p> | | |
| 133 | Katherine Drew, The Royal Parks | Place-based Strategy for Teddington & Hampton Wick - 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 Council's Statement of Consultation (June 2023) 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]</p> | | <p>The Council’s response to the Royal Park’s comments on the Regulation 18 Plan (comments 301 and 302) set out that the strategy requires development to protect, improve and increase open spaces recognising the importance of Bushy Park to the place, and additional references to protect open space and reference the recreational pressures were added into the Regulation 19 Plan.</p> |
| 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. 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,</p> | | <p>The Council’s response to the respondent’s comment on the Regulation 18 Plan (comment 300) was that the identified mid-rise zone for Teddington railway side, covering a small part of the town centre was considered appropriate; various amendments were made to the Urban Design Study 2023 to the character profile, design guidance and the mid-rise zone, particularly to reference heights of recent/existing developments and to state that proposed buildings should respond to surrounding context, stepping down in scale where appropriate to lower prevailing context.</p> <p>See also response to comment 173 in relation to the Teddington mid-rise zone.</p> |

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| | | | | | | 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". | | |
| 135 | Howard Dix | Teddington mid-rise zone | | | | Teddington Station Road, p.48 includes: '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.' 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. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 136 | John Danby | Teddington mid-rise zone | N | O | Justified | Section 7: Place Based Strategy for Teddington & Hampton Wick page 48 (last paragraph) Section 19.29: Designation of Teddington Business Park as a Locally Significant Industrial Site (LSIS) page 262/263 Section 28: Appendix 3 Tall & Mid-Rise Building Zones (page 413) 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. 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. 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. 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. | 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 | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 137 | Claudette Eldridge | Teddington mid-rise zone | | | | Buildings by Teddington bridge How disgraceful of you to even consider this obscene plan. I bet none of you live there. I grew up and lived for 60 years in Teddington. You should be ashamed. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 138 | Jo Gourlay | Teddington mid-rise zone | | | | 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. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 139 | Hannah Mackenzie | Teddington mid-rise zone | | | | 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. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 140 | Hardy Giesler | Teddington mid-rise zone | N | N | O | 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). 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: - The area is almost entirely residential – with the exception of the business park and mid-rise zone buildings would destroy the residential environment; - The existing business park serves a valuable purpose and being a low-rise development, fits in with the mainly residential neighbourhood; 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 | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |

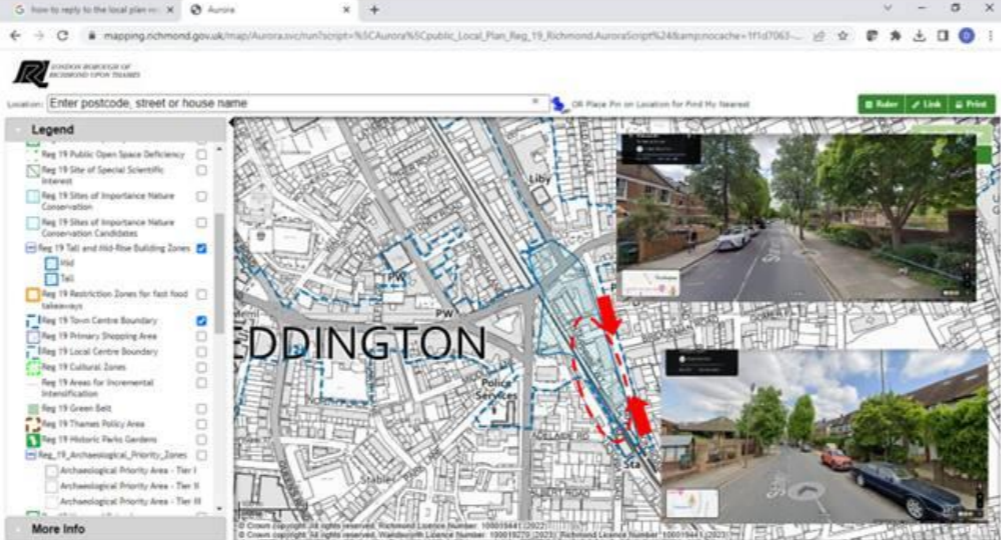

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| | | | | | | | complete eyesore – it seems to have been erected using cheap construction materials and is ‘adorned’ with multiple installations of telecoms equipment on the roof, much of which is obsolete, I believe. My wife and I own a property in [Teddington road name removed for data protection] , 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. | | |
| 141 | Jennifer Kelly | Teddington mid-rise zone | | | | | 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. 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 primatial 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. 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 . | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 142 | Nuala Orton | TEDDINGTON No further mid-rise zone buildings! | Yes | No | No | Justified | Consult all Teddington residents regarding the proposed increase in the number of mid-rise buildings Publish the outcome | As above | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 143 | Anthony Kearney | Teddington mid-rise zone | | | | | After reading the recent consultation letter I too reflect the concerns of the Teddington society as below and would like to express my disapproval. 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. I am a resident on [Teddington address details removed for data protection] 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 ? | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 144 | Alison Campbell | Teddington mid-rise zone | | | | Effective; Justified | 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. 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. | Maintain the industrial estate. | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. Comments noted, however, Teddington Business Park, Station Road, is being retained as a Locally Important Industrial Land and Business Park. |
| 145 | Rosemary Perry | Teddington mid-rise zone | | | | | 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. 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 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. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |

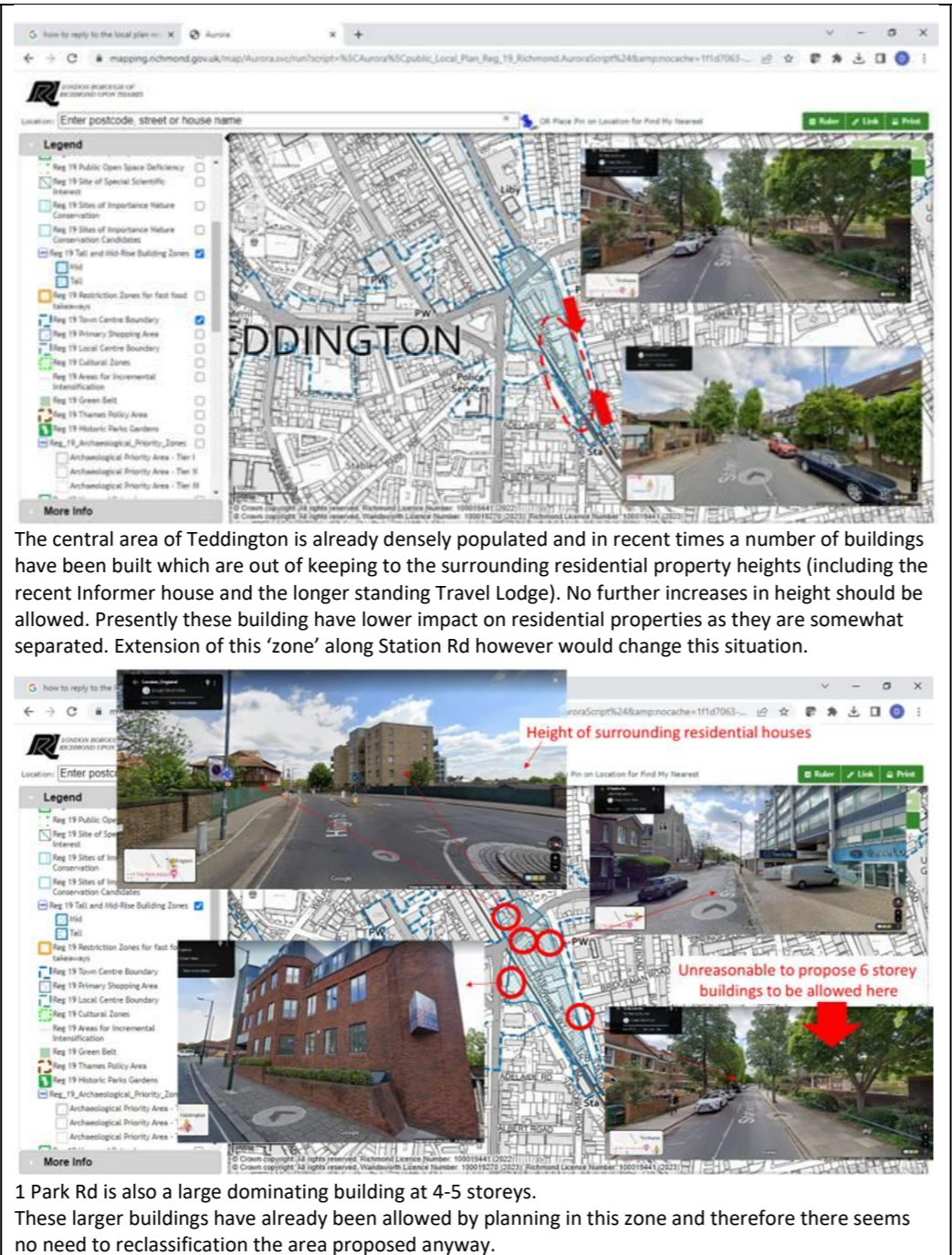
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| | | | | | | Your Map for that part of Teddington is littered with TPOs, conservation areas etc. and I would urge you not to alter the skyline any more. Leave that part of Teddington alone, enough damage has been done in my decades as a rate payer/Council Tax payer. Hoping you will reconsider inclusion of 5/6 storeys on the high bridge over the railway. | | |
| 146 | Roger Byatt | Teddington mid-rise zone | | | | Re Teddington town centre I support the Teddington Society's view that 5-6 storeys is far too high. Personally I find the Teddington Business Park e.g. Halfords very convenient and would prefer it to remain. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. Comments noted, however, Teddington Business Park, Station Road, is being retained as a Locally Important Industrial Land and Business Park. |
| 147 | Kellie Coyne | Teddington mid-rise zone | | | | 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: * I own a home on [Teddington road name removed for data protection] 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. * 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 * 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. * the current Business park is well designed to have a minimum impact on neighbours * 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. * it would dominate the streets and cause noise and light pollution for the residents. It would significantly damage this pre-dominantly low-rise residential area and the character of Teddington | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 148 | Gillian Carrick | Teddington mid-rise zone | | | | 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. High rises have no place here. Please reconsider. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 149 | Carlo Malka | Teddington mid-rise zone | | | | 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" 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. 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. 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. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 150 | Charles Hide | Teddington mid-rise zone | | | | 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 its 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: • 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. • 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 | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |

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| | | | | | | <p>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.</p> <ul style="list-style-type: none"> • 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. • 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. • 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. <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. | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. Comments noted, however, Teddington Business Park, Station Road, is being retained as a Locally Important Industrial Land and Business Park. |
| 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> | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 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 & 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. 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> | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 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</p> | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |

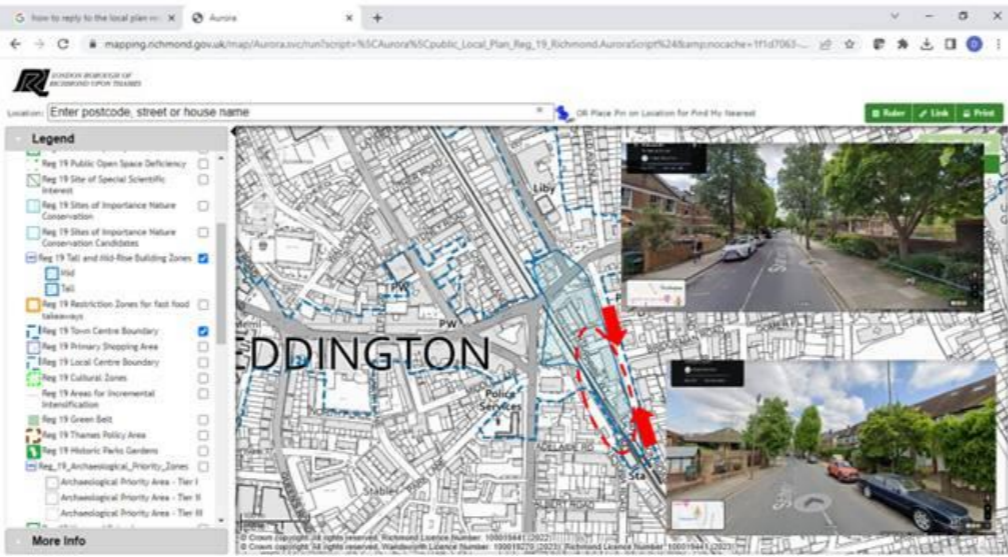
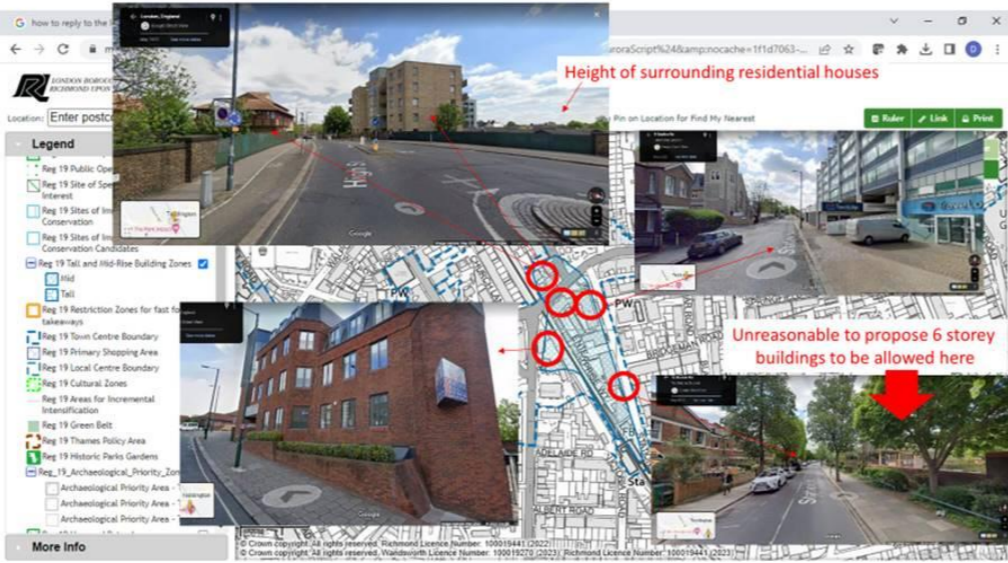
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| | | | | | | also concerned at the potential loss of Teddington Business Park, which provides much needed office and industrial space and is a useful asset to the town without being over intrusive. There is also a consideration to the outlook for 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. | | |
| 155 | Bouquette Kabatepe | Teddington mid-rise zone | | | | I would like to submit my rejection of the "Teddington local plan" 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. Our Surgeries, Schools, Dentists, Trains an and Busses are full beyond their capacities. The traffic and parking is already at a critical point. 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 outstretched 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. ! 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. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 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. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 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. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 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. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 159 | Nicky Smith | Teddington mid-rise zone | | | | I object to the plans for more buildings and high rise block near Teddington Station. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 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. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 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. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. Comments noted, however, Teddington Business Park, Station Road, is being retained as a Locally Important Industrial Land and Business Park. |
| 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. | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |

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| | | | | | | Please listen to the people. | | |
| 163 | Ann Whitfield | Place Based Strategy for Teddington and Hampton Wick, Appendix 3 Tall and Mid-Rise Building Zones | | | | <p>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:</p> <ul style="list-style-type: none"> • Section 7: Place Based Strategy for Teddington and Hampton Wick (page 48) • Section 28: Appendix 3 Tall and Mid-Rise Building Zones (page 415) <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>I would therefore request that the Local Plan is amended so that this area in Teddington is NOT defined as a 'mid-rise zone'.</p> | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. Comments noted, however, Teddington Business Park, Station Road, is being retained as a Locally Important Industrial Land and Business Park. |
| 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 [Teddington address details removed for data protection].</p> <p>I would not object to any development of two stories.</p> | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 165 | Stephen Mowat | Teddington mid-rise zone | N | o | 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 pana 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. I wish to register my objection</p> | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 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 [Teddington road name removed for data protection] 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> | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 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.</p> <p>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> | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 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 & 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 & 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 & 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 & minimum maintenance. Houses for sale will not meet the needs of people who cannot & probably never will be able to afford a mortgage. We have a duty to support a wide & varied community particularly those who provide many of our support services & enable us to live in a civilised society.</p> | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. Comments noted, however, Teddington Business Park, Station Road, is being retained as a Locally Important Industrial Land and Business Park. |

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| 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>  | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| | | | | | <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 buildings 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.</p> <p>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.</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 residential character of the area in the red dotted area.</p> | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |

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| | | | | |  <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> | | <p>Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. Comments noted, however, Teddington Business Park, Station Road, is being retained as a Locally Important Industrial Land and Business Park.</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> | | <p>Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. Comments noted, however, Teddington Business Park, Station Road, is being retained as a Locally Important Industrial Land and Business Park.</p> |

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| 173 | Rosemary McGlashon, The Teddington Society | Teddington mid-rise zone | | N o | | <p>Justified</p> <p>Page numbers 47, 48, 262, 263, 413</p> <p>Section 7, Place-based Strategy for Teddington & Hampton Wick</p> <p>Policy 45, Maps: p26, Appendix 3 Teddington p413.</p> <p>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 & Hampton Wick (p.48) [See the Council's Statement of Consultation (June 2023) 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.</p> <p>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.</p> <p>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.</p> <p>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 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> | <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> | <p>The Urban Design Study has followed a well-established methodology, and the findings of the characterisation study were used to identify capacity for growth and an overall development strategy, with the broad areas for tall and mid-rise buildings. The Council's response to the respondent's comment on the Regulation 18 Plan (comment 300) was that the identified mid-rise zone for Teddington railway side, covering a small part of the town centre was considered appropriate; various amendments were made to the Urban Design Study 2023 to the character profile, design guidance and the mid-rise zone, particularly to reference heights of recent/existing developments and to state that proposed buildings should respond to surrounding context, stepping down in scale where appropriate to lower prevailing context.</p> <p>Also note Teddington Business Park, Station Road, is being retained as a Locally Important Industrial Land and Business Park.</p> <p>With a robust evidence base, it is therefore considered there is an appropriate policy framework to assess proposals. As set out at paragraph 20.5 in the Publication Local Plan, the Council will consider further supplementary planning document(s) or toolkits to inform design expectations.</p> |
| 174 | Margaret Ballantyne | Teddington mid-rise zone | | | | <p>First I would like to ask why residents in [Teddington address details removed for data protection] 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> | | <p>Comments and objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone.</p> <p>Note the Council did not send any paperwork/booklet to individual properties about the designation of tall and mid-rise building zones. The Statement of Consultation sets out details of how the consultation at each stage of the Plan's preparation has been undertaken in accordance with the relevant regulations and the Council's Statement of Community Involvement.</p> |

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| - | Jenny & Rod Linter | Teddington mid-rise zone | No | Justified | [See comment 505 in relation to the Teddington Mid-rise Zone] | | See response to comment 505. |
| 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) Below is the Association's response to the proposals for the revisions to the local plan in Teddington. 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 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> | | Comments noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |
| 176 | Margaret Stapleton | Teddington mid-rise zone | | | <p>I am writing to express my deep concern over plans for a mid-rise zone 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</p> | | Objection noted. See also response to comment 173 in relation to the Teddington mid-rise zone. |

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| | | | | | | views from the residential streets near the station. I live in [Teddington road name removed for data protection] 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. I am sincerely hoping that local residents' views and opinions will be taken seriously as part of the consultation for the Local Plan. | | |
| 177 | Paul Paul | Teddington mid-rise zone | | | | 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. I strongly disapprove of such a new development. 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. This is meant to be a conservation area and additional building squashed into that area will be an eyesore. It will also be a nightmare for people living in the Cedars. 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. 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. If this does go through I certainly will not vote for the Lib-Dem council again. Again I strongly disapprove of such a new development. 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. | | Comments noted. See also response to comment 173 in relation to the Teddington mid-rise zone. Note the Council did not send any paperwork/booklet to individual properties about the designation of tall and mid-rise building zones. The Statement of Consultation sets out details of how the consultation at each stage of the Plan's preparation has been undertaken in accordance with the relevant regulations and the Council's Statement of Community Involvement. |
| - | | | | | | Site Allocation 6: Telephone Exchange, Teddington | | |
| 178 | David Wilson, Thames Water | Site Allocation 6 Telephone Exchange, Teddington | | | | Thames Water Site ID 49784 (Reviewed Jan18) Water Response: 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 Waste Response: 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 Additional Comments: 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. | | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| - | | | | | | Site Allocation 7: Teddington Delivery Office, Teddington | | |
| 179 | David Wilson, Thames Water | Site Allocation 7 Teddington Delivery Office, Teddington | | | | Thames Water Site ID 49785 (Reviewed May 21) Water Response: 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 Waste Response: 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 | | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |

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| | | | | | | Additional Comments: 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. | | |
| - | | | | | | Site Allocation 8: Strathmore Centre, Strathmore Road, Teddington, TW11 8UH | | |
| 180 | David Wilson, Thames Water | Site Allocation 8 Strathmore Centre, Strathmore Road, Teddington, TW11 8UH | | | | Thames Water Site ID 41229 (Reviewed Jan18) Water Response: 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 Waste Response: 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 Additional Comments: 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. | | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| - | | | | | | Site Allocation 9: Teddington Police Station, Park Road, Teddington | | |
| 181 | Roger Byatt | Site allocation 9: Teddington Police Station | | | | Site allocation 9: Teddington Police Station I think priority should be given to building as relocation site for the Park Road Surgery | | Comments noted. In response to comments on this issue in the Regulation 18 consultation comments, the Council set out that the Site Allocation already makes it clear that redevelopment of the site will only be acceptable if a community/social infrastructure use is reprovided on the site, such as for a medical/health use, and that it would not be appropriate for planning to specify occupation by the GP. |
| 182 | David Wilson, Thames Water | Site Allocation 9 Teddington Police Station, Park Road, Teddington | | | | Thames Water Site ID 75262 Water Response: 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. Waste Response: 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. Additional Comments: To provide a more detailed response we will require information on the scale of development. | | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| - | | | | | | Place-based Strategy for Twickenham, Strawberry Hill & St Margarets | | |
| - | 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] | | See response to comment 192. |
| 183 | Graham Martin | Place-based Strategy for | N | o | Positively Prepared | 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. | | Comments noted. Initial feasibility studies have been carried out and Ham to |

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| | | Twickenham, Strawberry Hill & St Margarets | | | | | <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> | | Twickenham has been identified as the most suitable location for a new pedestrian/cycle bridge. See also response to comment 230. |
| 184 | Olivia Russell (CBRE), Rugby Football Union (RFU) | Place-based Strategy for Twickenham, Strawberry Hill & St Margarets | Yes | No | Yes | <p>Justified; Consistent with national policy</p> <p>Design Objectives</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 <i>"Twickenham's important sporting and cultural attractions will be maximised"</i> 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: <i>"Twickenham's important sporting and cultural attractions will be maximised and disruption to local residents and businesses minimised"</i>.</p> | | Support noted. | |
| 185 | Philip Villars, PMV Planning Limited on behalf of owner of Arlington Works | Place-based Strategy for Twickenham, Strawberry Hill & St Margarets | | No | | <p>Our previous comments which still remain relevant</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>8 Place-based Strategy for Twickenham, Strawberry Hill & St Margarets</p> <p>[See the Council's Statement of Consultation (June 2023) 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</p> | | The Council's response to the respondent's comment (comment 709) references an Appeal concerning a planning application for Arlington Works for redevelopment of the site for a mixed-use commercial and residential scheme. The Appeal was dismissed and the Planning Inspector agreed with the Council that the development would be significantly harmful to London's strategic approach to the management of waste and that the scheme would conflict with Policies SI 8 and SI 9 of the PVLp (then the publication version of the London Plan, now the | |


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| | | | | | | as such should consider and support the contribution that sites such as Arlington Works can play in regeneration. 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. | | London Plan 2021). As a result of the above, in the instance of Arlington Works, the Council will continue to safeguard the existing waste site. See also response to comments 75 and 329. The maps for the place-based strategies show the character areas within the 'place'. St Margarets Local Centre is not a character area as defined within the Urban Design Study 2023. |
| 186 | Craig Hatton, Network Rail (Southern) | 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. | | Comments noted. The promotion of active travel is referenced as a policy aspiration for the place-based strategy. In addition, paragraph 23.23 in the supporting text to Policy 47 refers to the need to improve quality and connectivity of transport interchanges, referring to transport schemes set out in the Local Implementation Plan. Planning obligations to secure funding would be dealt with at full planning application stage where relevant. |
| 187 | Luke Burroughs, Transport Trading Limited Properties Limited (TTLP) | Place based strategy for Twickenham, Strawberry Hill & St Margarets | | | | Place-based Strategy for Twickenham, Strawberry Hill & St Margarets 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] | | Support noted. |
| - | | | | | | Site Allocation 10: St Mary's University, Strawberry Hill | | |
| 188 | Tim Brennan, Historic England | 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. | | General support noted. An additional modification can be considered to correct the factual area relating to the chapel Listing. The Site Allocation and the thematic policies are considered to provide an appropriate framework to assess proposals. See response to comment 80. |
| 189 | John Sadler, CPRE London | 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). | | Concerns noted. The Council's response to the respondent's comment on the Regulation 18 Plan (comment 510) amended reference to MOL and the Council considers this accords with Policy 35. |
| 190 | David Wilson, Thames Water | Site Allocation 10 St Mary's University, | | | | Thames Water Site ID 41232 (Reviewed Jan18) Water Response: 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 | | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not |

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| | | Strawberry Hill | | | | <p>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>Waste Response: 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>Additional Comments: To provide a more detailed response we will require information on the scale of development.</p> | | <p>overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions.</p> <p>Matters relating to water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text.</p> |
| 191 | Jo Edwards, Sport England | Site Allocation 10 St Mary's University, Strawberry Hill | | | | <p>support reference in vision to retention or replacement of playing fields and sports facilities to equal or better standard</p> | | <p>Support noted.</p> |
| 192 | Andrew Miller, Strawberry Hill Residents' Association | Site Allocation 10 St Mary's University, Strawberry Hill (future plans) | | | | <p>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.</p> | <p>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.</p> | <p>St Mary's University have commented on the Plan separately at both Regulation 18 and 19 stages and have not advised that their intentions for the site have significantly changed and their support for the inclusion of the campus as a Site Allocation is noted. See also comment 193.</p> |
| 193 | Lucy Hale (Gerald Eve), St Mary's University | 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>Background to St Mary's</p> <p>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 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. 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>Draft Site Allocation 10: St Mary's University, Strawberry Hill</p> <p>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 Council's Statement of Consultation (June 2023) 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. 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. 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)</p> | <p>The Council's response to the respondent's comment on the Regulation 18 Plan (comment 506) was that the Site Allocation as it stands does not preclude the Teddington Lock site coming forward for development as part of an overall strategy (and being assessed against the Development Plan) though it does ensure that any partial redevelopment does not preclude the overall objectives of the Site Allocation from being met. It was therefore considered that the creation of a separate Site Allocation is neither necessary or appropriate.</p> <p>The further comments are noted; however, the Council's response remains unchanged.</p> |

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| | | | | | | | <p>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 Site Allocation 10. We would suggest that bullet point number 2 of the draft Site Allocation, is amended to read as follows:</p> <p><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 reprovision of facilities should be equal or better standard than existing."</i> [amendments in bold].</p> <p>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.</p> <p>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.</p> | |
| - | | | | | | | Site Allocation 11: Richmond upon Thames College, Twickenham | |
| 194 | David Wilson, Thames Water | Site Allocation 11 Richmond upon Thames College, Twickenham | | | | | <p>Thames Water Site ID 61057 (Approved - 25/05/22)</p> <p>Water Response: 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 https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |

| | | | | | | <p>Waste Response: 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>Additional Comments: 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.</p> <p>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.</p> | | | | | | | | |
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| 195 | Jo Edwards, Sport England | 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.. | | Support noted. Implementation of permissions previously granted is underway; this is identified as site 47 in the PPS Action Plan. | | | | | | |
| - | | | | | | Site Allocation 12: The Stoop (Harlequins Rugby Football Club), Twickenham | | | | | | | | |
| 196 | John Sadler, CPRE London | 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. | | Comments noted. The vision includes that any development proposal is required to protect, and where possible enhance, the River Crane corridor and the Duke of Northumberland River. | | | | | | |
| 197 | Richard Carr, Transport for London (TfL) | 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. | | Comments noted. |
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| 198 | David Wilson, Thames Water | Site Allocation 12 The Stoop (Harlequins Rugby Football Club), Twickenham | | | | <p>Thames Water Site ID 75264</p> <p>Water Response: 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>Waste Response: 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> | | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. | | | | | | |

| | | | | | | Additional Comments: To provide a more detailed response we will require information on the scale of development. | | | | | | | | |
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| 199 | Jo Edwards, Sport England | Site Allocation 12 The Stoop (Harlequins Rugby Football Club), Twickenham | | | | should be made clearer in vision that any development proposals should not impact on the stadium area including stand capacity and pitch. | | Comments noted. The Site Allocation vision makes clear support for the continued use of the site as a sporting venue, and that development must be complementary to this use. | | | | | | |
| 200 | Nikki Nicholson, Surrey County Council | 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> | | Comments noted. It is noted in the neighbour context that the adjacent Depot is a safeguarded waste site. See also the responses to comments 330, 334 and 527. | | | | | | |
| - | | | | | | Site Allocation 13: Twickenham Stadium, Twickenham | | | | | | | | |
| 201 | Richard Carr, Transport for London (TfL) | 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> <p>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: 'There is a need to retain Parking provision particularly for coaches, servicing facilities and space for spectators and related services, should be in line with London Plan standards and should include coach parking and servicing facilities.'</p> <p>We welcome the reference to close working with TfL to ensure development does not lead to unacceptable impacts on the local road network.</p> </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. | <p>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: 'There is a need to retain Parking provision particularly for coaches, servicing facilities and space for spectators and related services, should be in line with London Plan standards and should include coach parking and servicing facilities.'</p> <p>We welcome the reference to close working with TfL to ensure development does not lead to unacceptable impacts on the local road network.</p> | | Support noted. An Additional Modification could be considered to ensure consistency with the London Plan, see the Statement of Common Ground with Transport for London. |
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| 202 | David Wilson, Thames Water | Site Allocation 13 Twickenham Stadium, Twickenham | | | | <p>Thames Water Site ID 75265</p> <p>Water Response: 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>Waste Response: 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> | | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. | | | | | | |

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| | | | | | | | Additional Comments: To provide a more detailed response we will require information on the scale of development. | | |
| 203 | Jo Edwards, Sport England | 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. | | Comments noted. The Site Allocation vision makes clear support for the continued use of the site as a sporting venue, and that development must be complementary to this use. |
| 204 | Olivia Russell (CBRE), Rugby Football Union (RFU) | 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. 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 Figure 1 below.</p>  <p>SITE ALLOCATION</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>Vision – Proposed site, Twickenham Stadium</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 and entertainment uses. 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 and entertainment venue ground".</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, 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".</i></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>General support noted.</p> <p>The Council's response to the respondent's comment on the Regulation 18 Plan (comment 522) was that inclusion of 'entertainment' as an acceptable primary land use risks diluting the primary sporting function of the site. However, the wording was amended to acknowledge entertainment as a secondary use.</p> <p>Comments noted regarding 'venue' versus 'grounds'. Given Sport England's comments raising concern that the sporting capacity should be protected, including the pitch, 'ground' is considered to be a more appropriate description.</p> <p>Comments on MOL noted. See Council's response to comment 464.</p> |

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| | | | | | | <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 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 venue grounds for sports uses, along with entertainment uses as a secondary/supporting land use. 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 venue ground."</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>Summary</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> | | | |
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| 205 | David Wilson, Thames Water | Site Allocation 14 Mereway Day Centre, Mereway Road, | | | | <p>Site Allocation 14: Mereway Day Centre, Mereway Road, Twickenham</p> <p>Thames Water Site ID 75266</p> <p>Water Response: 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</p> | | | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility |

| | | Twickenham | | | | <p>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>Waste Response: 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>Additional Comments: 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 > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater direct to a watercourse > Discharge rainwater direct to a surface water sewer/drain > Discharge rainwater to the combined sewer.</p> | | <p>and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions.</p> <p>Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text.</p> | | | | | | |
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| - | | | | | | Site Allocation 15: Station Yard, Twickenham | | | | | | | | |
| 206 | Richard Carr, Transport for London (TfL) | 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. | | Support noted. |
| 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. | | | | | | | | | | | | |
| 207 | David Wilson, Thames Water | Site Allocation 15 Station Yard, Twickenham | | | | <p>Thames Water Site ID 75270</p> <p>Water Response: 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>Waste Response: 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>Additional Comments: 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 > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater direct to a watercourse > Discharge rainwater direct to a surface water sewer/drain > Discharge rainwater to the combined sewer.</p> | | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. | | | | | | |
| 208 | Craig Hatton, Network Rail (Southern) | 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. | | Comments and support noted. | | | | | | |
| 209 | Luke Burroughs, Transport Trading Limited Properties Limited (TTLP) | Site Allocation 15 Station Yard, Twickenham | | | | <p>Site allocation 15: Station Yard</p> <p>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.</p> | | Comments and support noted. | | | | | | |

| - | | | | | | Site Allocation 16: Twickenham Telephone Exchange | | | | | | | | |
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| 210 | David Wilson, Thames Water | Site Allocation 16 Twickenham Telephone Exchange | | | | <p>Thames Water Site ID 71999</p> <p>Water Response: 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>Waste Response: 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>Additional Comments: 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.</p> <p>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.</p> | | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. | | | | | | |
| - | | | | | | Site Allocation 17: Twickenham Riverside and Water Lane/King Street | | | | | | | | |
| 211 | David Wilson, Thames Water | Site Allocation 17 Twickenham Riverside and Water Lane/King Street | | | | <p>Thames Water Site ID 65539</p> <p>Water Response: 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>Waste Response: 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> | | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. | | | | | | |
| 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.' | | Support noted. |
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| 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.' | | | | | | | | | | | | |
| 213 | Rachel Holmes, Environment Agency | Site Allocation 17 Twickenham Riverside and Water | | | | Site allocation 18 [now Site Allocation 17] – Twickenham Riverside and Water Lane/King Street We welcome that the site allocation has removed the term 'where viable' in relation to the flood defence improvement works. | | Support noted. | | | | | | |

| | | Lane/King Street | | | | | | | | | | | | |
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| - | | | | | | | | Site Allocation 18: Homebase, Twickenham Road, Hanworth | | | | | | |
| 214 | David Wilson, Thames Water | Site Allocation 18 Homebase, Twickenham Road, Hanworth | | | | | | <p>Thames Water Site ID 75272</p> <p>Water Response: 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>Waste Response: 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>Additional Comments: To provide a more detailed response we will require information on the scale of development.</p> | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. | | | | | |
| 215 | Zamir & Violetta Gobra | Site Allocation 18 Homebase, Twickenham Road, Hanworth | | | | | | <p>We write in response to your Notice of Publication Consultation. We understand that the Allocation of the Homebase site is not a planning application.</p> <p>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.</p> <p>Our present request is that Planning Consultation should establish our interest in this project and provide us with information when a development is proposed.</p> <p>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.</p> <p>In the interim, we do not oppose the Allocation and we look forward to participating in the design and development process.</p> | Comments and support noted. Details of layout etc. would be for a landowner/developer to bring forward, and consult with neighbours as relevant at any preapplication or application stage. | | | | | |
| - | | | | | | | | Site Allocation 19: Fulwell Bus Garage, Wellington Road, Twickenham | | | | | | |
| 216 | Richard Carr, Transport for London (TfL) | 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. | Support noted. |
| 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. | | | | | | | | | | | | |
| 217 | David Wilson, Thames Water | Site Allocation 19 Fulwell Bus Garage, Wellington Road, Twickenham | | | | | | <p>Thames Water Site ID 75273</p> <p>Water Response: 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>Waste Response: 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>Additional Comments: To provide a more detailed response we will require information on the scale of development.</p> | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. | | | | | |

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| 218 | Craig Hatton, Network Rail (Southern) | 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.</p> <p>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> | <p>To make this sound, specific reference should be made to <i>'seeking developer and other third-party contributions towards improving identified factors that limit access to the station'</i>.</p> <p>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.</p> <p>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.</p> | <p>Comments noted. Fulwell Station is located outside of the Site Allocation, though the policy text does refer to opening up the site at the south to improve cycling and pedestrian routes to the station. In addition, paragraph 23.23 in the supporting text to Policy 47 refers to the need to improve quality and connectivity of transport interchanges, referring to transport schemes set out in the Local Implementation Plan. Planning obligations to secure funding would be dealt with at full planning stage where relevant.</p> |
| 219 | Duncan McKane, London Borough of Hounslow | 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 re-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.</p> <p>[See also comment 552 in regards to transport and highway impacts]</p> | | <p>Comments noted.</p> |
| 220 | Luke Burroughs, Transport Trading Limited Properties Limited (TTLP) | Site Allocation 19 Fulwell Bus Garage, Wellington Road, Twickenham | | | | <p>Site Allocation 19: Fulwell Bus Garage and Lidl</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 <i>"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."</i> The allocation later recognizes that <i>"this site is suitable for a substantial provision of new housing units, including a policy compliant level of affordable housing"</i>.</p> <p>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 <i>"this site is suitable for a substantial provision of new housing units, including a policy compliant level of affordable housing"</i></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 <i>"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."</i> 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 <i>"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."</i> In regard to the Fulwell area, the Urban Design Study and Village Planning Guidance document (2023) states that development should <i>"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"</i> and <i>"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"</i></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 <i>"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"</i></p> | | <p>Comments and support noted.</p> <p>The policy wording is intended to outline the importance of retention/reprovision of social infrastructure uses, as per Policy 49 of the Local Plan, whilst also acknowledging the housing development potential of the site, and is worded such so as to allow some flexibility as to how these aspirations are delivered, noting that there is no evidence the Council is aware of that the ambulance and fire service uses are surplus to requirements.</p> <p>The Site Allocation boundary does not preclude a planning application from coming forward which incorporates land outside of the boundary.</p> <p>The text already references the requirement to have regard to the Urban Design Study.</p> |

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| | | | | | | | station ". The wording within the Urban Design Study and Village Planning document (2023) should be recognized within the site allocation. | | |
| - | | | | | | | Place-based Strategy for Whitton & Heathfield | | |
| 221 | Emma Penson (DWD), Dukes Education Group and Radnor House School | Place-based Strategy for Whitton & Heathfield | N o | N o | N o | Positively Prepared ; Justified; Effective; Consistent with national policy | Place-based Strategy for Whitton & Heathfield 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] | | Comment noted. See response to comment 226. |
| 222 | Nick Dexter, Whitton Community Association | Place-based Strategy for Whitton & Heathfield | | N o | | Effective | "Minor Corrections" 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". | 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)" | An additional modification could be considered. |
| - | | | | | | | Site Allocation 20: Telephone Exchange, Ashdale Close, Whitton | | |
| 223 | David Wilson, Thames Water | Site Allocation 20 Telephone Exchange, Ashdale Close, Whitton | | | | | Thames Water Site ID 54327 Water Response: 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 Waste Response: 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 Additional Comments: 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. | | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage. |
| - | | | | | | | Site Allocation 21: Kneller Hall, Whitton | | |
| 224 | David Wilson, Thames Water | Site Allocation 21 Kneller Hall, Royal Military School Of Music, Kneller Road, Twickenham, TW2 7DU (Pending) | | | | | Thames Water Site ID 54328 (Pending) Water Response: 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 Waste Response: 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 Additional Comments: 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. 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. | | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage. |

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| 225 | Jo Edwards, Sport England | Site Allocation 21 Kneller Hall, Whitton | | | | | support reference to retaining and where possible upgrading of playing fields including provision of ancillary facilities such as changing to support their use. | | Support noted. |
| 226 | Emma Penson (DWD), Dukes Education Group and Radnor House School | Site Allocation 21 Kneller Hall, Whitton | No | No | No | 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'. This letter sets out:</p> <ul style="list-style-type: none"> The ownership of the Kneller Hall site; Background to Dukes Education Group and the proposed Kneller Hall School; The site owner's proposals for Kneller Hall; 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 A response to the proposed Site of Importance for Nature Conservation Designation. <p>Kneller Hall's Ownership</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>Dukes Education Group</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.</p> <p>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.</p> <p>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 Education 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>Kneller Hall School</p> <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.</p> | Resubmission of comments to Regulation 18 consultation regarding access to open space noted. The Council's response to the comment on the Regulation 18 Plan (comment 560) was to state that site is located in an Area Poorly Provided with Public Open Space and to note the requirements of London Plan Policy G4 and Local Plan Policy 37. The Council noted that the onus would be on an applicant to demonstrate why/how the development would not be able to provide publicly accessible open space, notwithstanding the policy requirements to improve existing provision for social cohesion and biodiversity reasons. Further, it was noted that it is not considered that the provision of public access to open space automatically conflicts with a proposed school use; whilst the need for pupil safeguarding is recognised, many private schools allow public access to their grounds and sport pitches on a managed basis, and this can be weighed up and managed via a Community Use Agreement at planning stage. It is noted from the Regulation 19 comments that this is the approach that has been taken. The Council would further add that whilst the advanced stage of the planning application is noted, the Site Allocation does allow for other uses other than educational, and is worded such to allow for flexibility, taking into account that it is not 100% guaranteed that any one planning application will be implemented. This is also the case regarding the aspirations of the Kneller Hall SPD, and again it is considered that these matters could be dealt with at full planning stage, as part of the planning balance of assessing an application. <p>See also responses to comments 221, 489 and 568.</p> | |

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| | | | | | <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Proposals for Kneller Hall</p> <p>The planning and listed building consent applications currently under consideration seek approval for: <i>"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."</i></p> <p>The Proposed Development comprises of the following core elements:</p> <ul style="list-style-type: none"> • 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. | |
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| | | | | | <p>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> <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>Representations to Draft Local Plan</p> <p>This section responds to question 6 and 7 of the LBR's Response Form.</p> <p>Site Allocation 21: Kneller Hall, Whitton</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.</p> <p>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 & 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>Summary</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 & 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> | | |
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| | | | | | | <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> | | | | | | | | | | | | | | | | | | |
| - | | | | | | Site Allocation 22: Whitton Community Centre, Percy Road, Whitton | | | | | | | | | | | | | | | | | | |
| 227 | Joan Gibson | Site Allocation 22 Whitton Community Centre, Percy Road, Whitton | | | | <p>Page 111 of the local plan is about Whitton Community Centre TW2 6JL. The Heritage Assest 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> <table border="1"> <tr> <td colspan="4"><small>CONTEXT: Proposed Site Whitton Community Centre, Percy Road, Whitton, Twickenham, TW2 6JL</small></td> </tr> <tr> <td>Flood Risk</td> <td> <ul style="list-style-type: none"> Flood Zone 1 Area Susceptible to Groundwater Flooding (>75% risk) </td> <td>Trees</td> <td>On-site trees bordering Percy Road. None protected.</td> </tr> <tr> <td>Views</td> <td>None</td> <td>Access to Open Space / Nature</td> <td> <ul style="list-style-type: none"> Twickenham Cemetery (35m north of site) (150m west) - Other Open Land of Townscape Importance (OOLTI), Site of Important Nature Conservation (SINC) There is a lively and attractive local shopping centre at Kew Gardens Station... there are also local parades at Kew Green and Sandycombe Road which provide for top-up shopping... the strategy for this area is to conserve the character, whilst enhancing existing features where appropriate (junction of Percy Road) (75m northwest) - OOLTI Crane Park East and Lincoln Fields sports pitches (100m south) - Metropolitan Open Land (MOL) </td> </tr> <tr> <td>Heritage Assets</td> <td> Adjacent to site: <ul style="list-style-type: none"> Building of Townscape Merit - Church of St Augustine of Canterbury, Hospital Bridge Road (20m south of site) </td> <td></td> <td></td> </tr> </table> | <small>CONTEXT: Proposed Site Whitton Community Centre, Percy Road, Whitton, Twickenham, TW2 6JL</small> | | | | Flood Risk | <ul style="list-style-type: none"> Flood Zone 1 Area Susceptible to Groundwater Flooding (>75% risk) | Trees | On-site trees bordering Percy Road. None protected. | Views | None | Access to Open Space / Nature | <ul style="list-style-type: none"> Twickenham Cemetery (35m north of site) (150m west) - Other Open Land of Townscape Importance (OOLTI), Site of Important Nature Conservation (SINC) There is a lively and attractive local shopping centre at Kew Gardens Station... there are also local parades at Kew Green and Sandycombe Road which provide for top-up shopping... the strategy for this area is to conserve the character, whilst enhancing existing features where appropriate (junction of Percy Road) (75m northwest) - OOLTI Crane Park East and Lincoln Fields sports pitches (100m south) - Metropolitan Open Land (MOL) | Heritage Assets | Adjacent to site: <ul style="list-style-type: none"> Building of Townscape Merit - Church of St Augustine of Canterbury, Hospital Bridge Road (20m south of site) | | | | <p>Comment noted. The 'Heritage Assets' section is correct. The text in 'Access to Open Space/Nature' has been reviewed and an Additional Modification could be considered to remove reference to retail facilities at Kew.</p> |
| <small>CONTEXT: Proposed Site Whitton Community Centre, Percy Road, Whitton, Twickenham, TW2 6JL</small> | | | | | | | | | | | | | | | | | | | | | | | | |
| Flood Risk | <ul style="list-style-type: none"> Flood Zone 1 Area Susceptible to Groundwater Flooding (>75% risk) | Trees | On-site trees bordering Percy Road. None protected. | | | | | | | | | | | | | | | | | | | | | |
| Views | None | Access to Open Space / Nature | <ul style="list-style-type: none"> Twickenham Cemetery (35m north of site) (150m west) - Other Open Land of Townscape Importance (OOLTI), Site of Important Nature Conservation (SINC) There is a lively and attractive local shopping centre at Kew Gardens Station... there are also local parades at Kew Green and Sandycombe Road which provide for top-up shopping... the strategy for this area is to conserve the character, whilst enhancing existing features where appropriate (junction of Percy Road) (75m northwest) - OOLTI Crane Park East and Lincoln Fields sports pitches (100m south) - Metropolitan Open Land (MOL) | | | | | | | | | | | | | | | | | | | | | |
| Heritage Assets | Adjacent to site: <ul style="list-style-type: none"> Building of Townscape Merit - Church of St Augustine of Canterbury, Hospital Bridge Road (20m south of site) | | | | | | | | | | | | | | | | | | | | | | | |
| 228 | David Wilson, Thames Water | Site Allocation 22 Whitton Community Centre, Percy Road, Whitton | | | | <p>Thames Water Site ID 75274</p> <p>Water Response: 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>Waste Response: 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>Additional Comments: To provide a more detailed response we will require information on the scale of development.</p> | | <p>Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions.</p> <p>Matters relating to water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text..</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.</p> <p>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.</p> <p>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>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>Comments noted.</p> <p>It is considered that the Site Allocation is clear that only if the currently community centre and pharmacy are adequately reprovided, can an affordable housing scheme be explored on the upper levels of any redevelopment.</p> <p>It is recognised that WCC is a highly valued community facility that caters to a wide range of users. Planning applications are subject to statutory consultation and any future planning application for the site will be required to consider the issues mentioned before a decision is made.</p> <p>An Additional Modification to the table (p109) could be considered to remove</p> | | | | | | | | | | | | | | | | |

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| | | | | | <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. 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 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 reprovide 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.</p> <p>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> | reference to Kew from the section 'Access to Open Space/Nature. |
| - | | | | | Place-based Strategy for Ham, Petersham & Richmond Park | |
| 230 | Geoff Bond, Ham & Petersham Association & Amenities Group | 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> | <p>Comments noted. There is no firm project in place for a new bridge, though it remains an aspiration, based on initial feasibility having been carried out. Individual comments regarding any future application would be more appropriately dealt with at consultation stages for highways and planning permissions. See also response to comment 183.</p> <p>The rationale for a Mid-Rise Building Zone at Ham Close is set out in the Urban Design Study. The Ham & Petersham Neighbourhood Plan Policy H2 Part B(2) states: 'Developments over 4 storeys will be considered acceptable if the proposal demonstrates positive benefits in terms of the townscape and local aesthetic quality and relate well to their local context'. Note 22/1442/FUL was granted permission in 2023.</p> <p>Support regarding school playing fields noted.</p> <p>See response to comment 567 in relation to the designation of the SINC and existing uses.</p> |


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| | | | | | | | | Comments noted regarding the cricket club, which would more appropriately be dealt with at full planning stage. |
| 231 | Graham Martin | 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] | | See response to comment 183. |
| 232 | Daniel Reich | 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? I'm referring to this text in the draft Local Plan: "Initial feasibility has been carried out for a new pedestrian and cycle bridge in the borough, with the best location found to be connecting Ham to Twickenham, 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." [following Council clarification wording is from the current Local Implementation Plan, and an initial feasibility study from 2018, further comments received:] Many thanks for the clarification, and for sharing the link to the initial feasibility study. 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. 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. I would appreciate it if you could take my concerns into account when finalising the Local Plan.</p> | | See response to comment 230. |
| 233 | Jon Rowles | Place-based Strategy for Ham, Petersham & Richmond Park | | | | <p>- 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</p> | | <p>The importance of the Royal Parks is recognised in the Plan, along with the recreational pressures faced. There are a number of policies that would apply to their protection. They are referenced in the relevant place-based strategies, by a number of policies in terms of those protecting MOL, biodiversity and nature conservation, views and vistas (Policies 34, 35, 39, 31), and that allow the impacts of development to be assessed (including Policies 53, 37, and 49). These are considered to adequately address the Royal Parks across the Plan as a whole.</p> <p>See also response to comment 16.</p> <p>Planning obligations are also a mechanism to make a development acceptable in planning terms. With regards to pressure on Parks from development, maintenance, management and protection of Parks would be dealt with via planning obligations and the borough Community Infrastructure Levy, which combined contribute to meeting the infrastructure needs of the borough. See response to comment 383 regarding impact from small sites.</p> |
| 234 | Katherine Drew, The Royal Parks | Place-based Strategy for Ham, Petersham | | | | 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. | | The Council's response to the respondent's comments on the Regulation 18 Plan (comments 567 and 658) was to note that Richmond Park is considered adequately |

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| | | & Richmond Park - specific to biodiversity and the Royal Parks' Environmental Designations | | | | [See Appendix 1, along with the Council's Statement of Consultation (June 2023) 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] | | protected by Policy 34, Policy 35 (through designation as MOL), and Policy 37. It was not considered necessary to repeat protection of particular parks and open space in the place-based strategies, which are linked to what future development is expected to contribute to. It was further noted that Policy 39 sets out how the protection of sites designated for biodiversity and nature conservation importance will be achieved. Recreational pressures are recognised in Policy 34 which also links with outreach and education. Light pollution is addressed by Policy 53. It was therefore not felt necessary to repeat all these policy protections in the place-based strategy. From August 2020 the Royal Parks trialled measures to reduce the impact of cut-through traffic, and in October 2022 following extensive traffic analysis announced some permanent measures. Given this has been implemented, and the Plan already recognises the importance of Richmond Park, it was not considered necessary to set out further details in the place-based strategies, which are linked to what future development is expected to contribute to. |
| 235 | Rachel Holmes, Environment Agency | Place-based Strategy for Ham, Petersham & Richmond Park | | | | Section 2 – Site allocations Place-based strategy for Ham, Petersham & Richmond Park We welcome that, in line with our Regulation 18 Consultation response, the 'Policy' section of the Place-based strategy for Ham, Petersham & Richmond Park emphasises the need to improve the riverside environment. | | Support for amendments made in response to Regulation 18 consultation comments noted. |
| - | | | | | | Site Allocation 23: Ham Close, Ham | | |
| 236 | David Wilson, Thames Water | Site Allocation 23 Ham Close, Ham | | | | Thames Water Site ID 49789 Water Response: 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 https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development . Waste Response: 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 https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development . | | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. Note 22/1442/FUL was granted permission in 2023. |
| - | | | | | | Site Allocation 24: Cassel Hospital, Ham Common, Ham | | |
| 237 | David Wilson, Thames Water | Site Allocation 24 Cassel Hospital, Ham | | | | Thames Water Site ID 41238 (Reviewed Jan18) Water Response: 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 | | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered |

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| | | Common, Ham | | | | | 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 Waste Response: 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 | | necessary to reference these in the Site Allocation text. |
| 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 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 re-use of the listed buildings, 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> | <p>The below amendments would make the policy sound.</p> <p>Bullet point 2 should read: "Only if other alternative social or community infrastructure uses have been explored, including marketing for a period of 6 months, 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."</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>An additional Minor Modification could be considered to correct reference to the Trust.</p> <p>Were an alternative social/community use not be viable, this would be borne out in the justification and marketing evidence. The onus would be on the applicant to demonstrate, via evidence, alternative uses and how they have been assessed and an appropriate approach taken forward. Policy 29 part C enables this consideration and this would be more appropriately dealt with as part of a pre-application discussion with the Council.</p> <p>Given the heritage sensitivities of the site and the local area, and noting the aspirations of the Site Allocation with regards their treatment, it is not considered appropriate to remove the 7th bullet.</p> <p>Support regarding cited timeframe noted.</p> |

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| - | Geoff Bond, Ham & Petersham Association & Amenities Group | | | | | [See comment 230 in relation to a change of use of Cassel] | | See response to comment 230. |
| - | | | | | | Place-based Strategy for Richmond & Richmond Hill | | |
| 239 | Julie Scurr | General comments on Richmond area | | | | <p>I am commenting specifically on what stands out for my local area:</p> <p>Richmond: 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&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 many 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> | | <p>Noted.</p> <p>The government’s introduction of the combined commercial, business and service use class in 2020 introduced a greater flexibility for changes of use including shops, cafes, restaurants, offices, gyms and health centres which the Council has limited powers to control.</p> <p>Notwithstanding this, the Plan sets out policies for when they can be applied and a vision and objectives in each place-based strategy. The Plan recognises the benefit of maintaining a concentrated retail core, and has designated Primary Shopping Areas in the larger centres which are the preferred locations for shops on the ground floor of units, and where new retail development is encouraged to locate.</p> <p>See also response to comment 397 in relation to the evening and night-time economy.</p> <p>See also response to comment 2 in relation to new development and impacts on infrastructure.</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> | | <p>Comments noted. The Plan as a whole promotes active travel, with reference to enhancing the public realm in the place-based strategy. The Council’s Local Implementation Plan refers to the potential long-term interventions for George Street including full or partial pedestrianisation, but as the Council will look at options it is considered too early to include any further details in the Local Plan.</p> |
| 241 | Katherine Drew, The Royal Parks | Place-based Strategy for Richmond & Richmond Hill - 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 Council's Statement of Consultation (June 2023) 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]</p> | | <p>The Council’s response to the respondent’s comments on the Regulation 18 Plan (comment 583) of the Regulation 18 consultation set out that reference to the recreational pressures and nature conservation designations was added in the Regulation 19 Plan into the area profile for Richmond and Richmond Hill, along with reference to promote sustainable travel. It is not considered necessary to further repeat policies covered elsewhere in the Plan, see response to comment 234.</p> |
| 242 | Craig Hatton, Network Rail (Southern) | Place-based strategy for Richmond & Richmond Hill | | | | <p>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-</p> | <p>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’.</p> <p>Opportunities for this include the provision of lifts at stations, improved access</p> | <p>See response to comment 186.</p> |

| | | | | | | 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. | from the public highway and providing step-free access at stations, where this is required. | | | | | | | |
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| 243 | Rachel Holmes, Environment Agency | Place-based Strategy for Richmond & Richmond Hill | | | | Place-based strategy for Richmond & Richmond Hill 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. | | Support noted. | | | | | | |
| 244 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (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 Council's Statement of Consultation (June 2023) 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] | | The Council's response to the respondent's comments on the Regulation 18 Plan (comment 586) set out that the text to the character area profile was amended in the Regulation 19 Plan to more explicitly refer to the four Conservation Areas as core of town centre character area, although the character area boundaries were considered to be logical and appropriate (see also response to comment 78 which references the methodology). The Council's response to the respondent's comments on the Regulation 18 Plan (comment 588) explained how the BID is relevant as an initiative the Council supports. | | | | | | |
| 245 | Peter Willan and Paul Velluet, Old Deer Park Working Group | 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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 589 in relation to Old Deer Park] | | The Council's response to the respondent's comments on the Regulation 18 Plan (comment 589) set out that it is not considered that the Old Deer Park warrants its own character area, as would not be appropriate for the broader scale of the Urban Design Study. | | | | | | |
| - | | | | | | Site Allocation 25: Richmond Station, Richmond | | | | | | | | |
| 246 | Louise Fluker, The Richmond Society | 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 " | Justification for the Tall Buildings with Bid-Rise Buffer Zone is set out in the Urban Design Study. The Council's response to the respondent's comments on the Regulation 18 Plan (comment 594) set out development would need to respond positively to the BTM and the Conservation Area, but the methodology for the Urban Design Study has established the height parameters and guidance for the site, which allows for flexibility of future development including an integrated transport hub, and is considered to provide an appropriate framework to assess proposals. | | | | | | |
| 247 | John Sadler, CPRE London | 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. | | Comments noted. The Council's response to the issue raised on development above the tracks (see response comments 595 and 596 on the Regulation 18 Plan) consider the Site Allocation allows for flexibility of future development including an integrated transport hub. | | | | | | |
| 248 | Richard Carr, Transport for London (TfL) | 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</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</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 | 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 | We welcome the reference to a partnership approach with Network Rail and TfL. | | Support noted. |
| Section | Track change/comment – Reg. 18 | Updated track/change comment – Reg. 19 | | | | | | | | | | | | |
| Site Allocation 24 [now Site Allocation 25]: 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 | We welcome the reference to a partnership approach with Network Rail and TfL. | | | | | | | | | | | | |

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| | | | | | | | Station, Richmond | helpful to make this expectation clear in the site allocation. | | |
| 249 | David Wilson, Thames Water | Site Allocation 25 Richmond Station, Richmond | | | | | | <p>Thames Water Site ID 2113 (Reviewed Jan18)</p> <p>Water Response: 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>Waste Response: 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>Additional Comments: To provide a more detailed response we will require information on the scale of development.</p> | | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| 250 | Gerard Manley (Firstplan), Baden Prop Limited | Site Allocation 25 Richmond Station, Richmond | N | N | Y | 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>a) Introduction</p> <p>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 Figure 1.</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>Figure 1. 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.</p> <p>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).</p> <p>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).</p> | <p>f) Changes BPL Require to Make the draft Local Plan 'Sound'</p> <p>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. Proposed Site Allocation 25 Changes</p> <p>VISION: PROPOSED SITE, BULLET 3:</p> <p>Any (omit: commercial) 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 (add: and provide housing for new residents to) bring(omit: ing) additional benefits to Richmond town centre.</p> <p>VISION: PROPOSED SITE, BULLET 4:</p> <p>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, (add: subject to viability)). However, to respond to changing market conditions, alternative uses can (subject to sufficient justification) also be appropriate).</p> <p>VISION: PROPOSED SITE, BULLET 6:</p> <p>The provision of housing (including policy-compliant affordable housing) in upper floors as part of a mixed-use (add: or indeed as standalone residential extensions) scheme would be appropriate (add: inline with the London Plan's aspiration for Incremental Intensification at this location.) 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, (add: subject to viability)).</p> <p>VISION: PROPOSED SITE, BULLET 10:</p> <p>The Urban Design Study identifies a small area next to the station as a tall building zone (add: including Westminster House) (7-8 storeys(add: +)), with a mid-rise zone buffer (5-6 storeys(add: +)), with the opportunity for a landmark building(add: s) that is well designed and sensitive to identified constraints, in accordance with Policy 45 Tall and Mid-Rise Building Zones. It recognises that development (add: must take account of) the scale of (add: some) 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.</p> <p>VISION: PROPOSED SITE, BULLET 12:</p> <p>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).</p> <p>APPENDIX 3, PAGE 414, 'RICHMOND CENTRE':</p> <p>Amend Tall Building Zone so that it includes Westminster House.</p> | <p>Objection regarding land use noted. See also response to comment 411.</p> <p>The rationale for the boundary and maximum heights for the Tall and Mid-Rise Building Zones is in the Urban Design Study. The Urban Design Study has followed a well-established methodology, and the findings of the characterisation study were used to identify capacity for growth and an overall development strategy, with the broad areas for tall and mid-rise buildings. Mid-Rise and Tall Building Zones are based on scenario testing of heights and their impacts on the surrounding townscape.</p> <p>The Urban Design Study references the more modest buildings on the Quadrant which is a relatively small scale road with 4-storey building line, and any new development should step down in scale to existing smaller scale residential buildings and buildings of townscape merit.</p> <p>With a robust evidence base, it is therefore considered there is an appropriate policy framework to assess proposals.</p> <p>Additional comments noted.</p> |

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| | | | | <p>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) Background Information</p> <p>i. Relevant Site Information</p> <p>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>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: "a part one/part two storey roof extension providing 578 sq m of additional Class B1 office floorspace, external terraces and associated works".</p> <p>Following this, in May 2019 planning permission (ref. 19/0527/FUL) was then granted for: "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." 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. Planning permission was also granted in December 2022 (ref. 22/2962/FUL) for: "Creation of a shopfront and access, elevational alterations, installation of louvres and associated works at basement and ground floor levels." 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. 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>c) Relevant Adopted Planning Policies</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"> • NPPF (adopted 2021); • The London Plan (Adopted 2021); and • RBT's Local Plan (Adopted 2108). <p>i. Plan-Making Policies</p> <p>The NPPF's Paragraph 35 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.</p> <p>They are 'sound' where they are:</p> <p>"a) 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, so that unmet need</p> | <p>[See comment 411 in relation to Policy 23 and KBA's inclusion of Westminster House]</p> | |
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from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
c) Effective – 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
d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”

Paragraph 31 of the NPPF relates to soundness in relation to the preparation and reviewing of local plans and states: “...**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**”.

ii. Site Allocation

RBT’s adopted Local Plan, Site Allocation SA19 ‘Richmond Station’. The allocation (area defined below at **Figure 2**) 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.

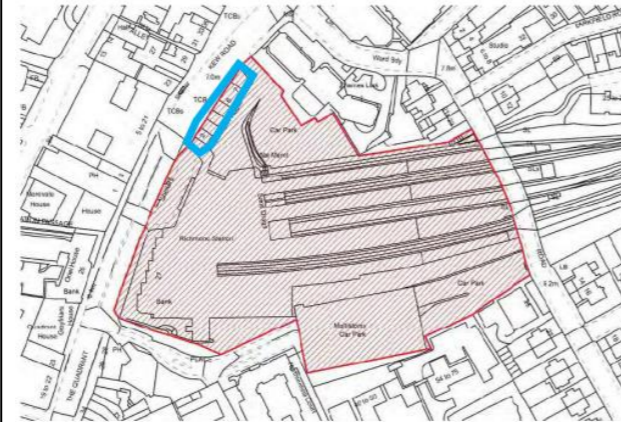


Figure 2: Plan showing land subject to Site Allocation SA19 (red line/hatching – site allocation, blue – site boundary)

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

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| | | | | | <p>borough's valued townscapes and landscapes. This relies on officer judgement in assessing each site alongside the character appraisals published for certain areas.</p> <p><u>iv. Town Centre and Housing Policies</u></p> <p>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: <i>"...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;"</i> (our underlining).</p> <p>Part f) of the NPPF paragraph 86 goes on to state that planning policies should: <i>"...recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites"</i>.</p> <p>Section 11 of the NPPF is associated with making effective use of land. Paragraph 119 states: <i>"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."</i></p> <p>Paragraph 120 of the NPPF goes on to note that 'Planning policies and decisions should:</p> <p><i>"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;</i></p> <p><i>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)."</i></p> <p>Paragraph 122 of the NPPF sets out the following: <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></p> <p>London Plan Policy H1 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 London Plan Policy SD6 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>Local Plan Policy LP 25 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>Local Plan Policy LP 26 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> | | |
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The London Plan's Policy E1 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.

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: **"locally-oriented, town centre office provision to meet local needs."**

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.

Part H of this policy states that: **"The scope for the re-use of otherwise surplus large office spaces for smaller office units should be explored."** 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).

The supporting text for London Plan Policy E1 (at 6.1.2) acknowledges that the office market is undergoing a **"period of reconstructing"** with (amongst other evolutive changes) **"changing work styles supportive by advances in technology"**.

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.

Adopted Local Plan Policy LP41 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.

An extract of the KOA boundary in respect of our client's site is provided below:

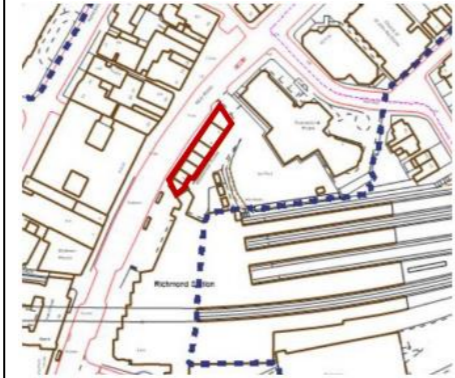


Figure 3: Extract from adopted Local Plan (2018) (dotted blue – KBA, red line - Site)

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 (in line 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**

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| | | | | | <p>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.</p> <p>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.</p> <p><i>Draft Policy 18</i></p> <p>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:</p> <p>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.</p> <p>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."</p> <p>BLP are generally accepting in how this policy and its supporting text has been drafted.</p> <p><i>2021 Local Housing Needs Assessment</i></p> <p>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).</p> <p><i>2023 Local Housing Needs Assessment</i></p> <p>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.</p> <p><i>Housing Trajectory</i></p> <p>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.</p> <p><i>Draft Policy 10</i></p> <p>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."</p> <p><u>iv. Employment Land Evidence Base and Draft Policies</u></p> <p><i>2021 Employment Land and Premises Needs Assessment</i></p> <p>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.</p> <p><i>2023 Employment Land and Premises Needs Assessment</i></p> <p>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.</p> <p><u>i. Draft Policy 23</u></p> <p>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."</p> <p>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.</p> <p>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.</p> | |
|--|--|--|--|--|---|--|

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.

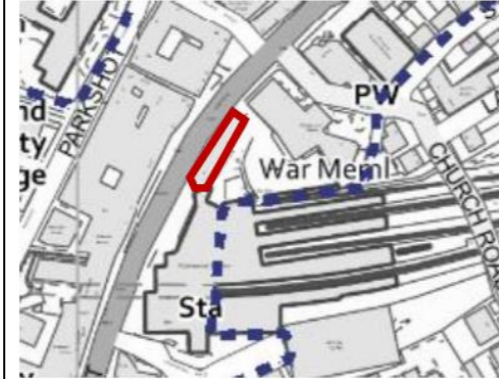


Figure 6: Extract from draft Local Plan (reg 19, 2023) (dotted blue – KBA, red line - Site)

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 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 in line with the provisions of the London Plan

The test for soundness in this respect is summarised below:

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|-----|--|-------------------------------------|--|--|--|---|--|
| | | | | | | <p style="text-align: center;">The Plan is not prepared positively</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 Table 1 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;">The Plan has not been justified</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;">The Plan Is not consistent with National or London-wide Policy</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, Network Rail (Southern) | 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. | Support and comments noted. |
| 252 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 596 in relation to this Site Allocation] | The Council's response to the respondent's comments on the Regulation 18 Plan (comment 596) set out that that any development proposal would need to set out how the BTM is protected, but the methodology for the Urban Design Study has established the height parameters and guidance for the site and is considered to provide an appropriate framework to assess proposals. |
| - | Peter Willan and Paul Velluet, Old Deer Park | | | | | [See comment 519 in respect of Policy 45 and high rise development which refer to Richmond Station] | - |

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| | Working Group | | | | | | | |
| - | Julie Scurr | | | | | | [See comment 239 in relation to the redevelopment of the station area] | - |
| - | | | | | | | Site Allocation 26: Former House of Fraser, Richmond | |
| 253 | David Wilson, Thames Water | Site Allocation 26 Former House of Fraser, Richmond | | | | | <p>Thames Water Site ID 62913</p> <p>Water Response: 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>Waste Response: 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> | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| 254 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 597 in relation to this Site Allocation]</p> | <p>The Council's response to the respondent's comment on the Regulation 18 Plan (comment 597) was that 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.</p> <p>It should be noted that the planning permission (22/2333/FUL) was granted in December 2022 to repurpose the site for retail, office, and leisure uses and this is currently being implemented.</p> |
| - | | | | | | | Site Allocation 27: Richmond Telephone Exchange, Spring Terrace, Richmond | |
| 255 | David Wilson, Thames Water | Site Allocation 27 Richmond Telephone Exchange, Spring Terrace, Richmond | | | | | <p>Thames Water Site ID 75276</p> <p>Water Response: 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>Waste Response: 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> | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| 256 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of | 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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 600 in relation to this Site Allocation]</p> | General support noted. The Council's response to the respondent's comment on the Regulation 18 Plan (comment 600) was that whilst the Site Allocation does not specifically state only a low-rise development would be acceptable, it does state that conversion of the existing building should be the starting point for any future development, and that if the site is to be redeveloped, any height should take into account the residential properties which adjoin the site. The wording of the |

| | Richmond Green) | | | | | | | | | Site Allocation was therefore considered to be appropriate. | | | | | | | |
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| - | | | | | | | | | | Site Allocation 28: American University, Queens Road, Richmond | | | | | | | |
| 257 | David Wilson, Thames Water | Site Allocation 28 American University, Queens Road, Richmond | | | | | | | Thames Water Site ID 75277 Water Response: 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. Waste Response: 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. Additional Comments: To provide a more detailed response we will require information on the scale of development. | | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. | | | | | | |
| 258 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 603 in relation to this Site Allocation] | | The Council's response to the respondent's comment on the Regulation 18 Plan (comment 603) was that it is not considered reasonable to be prescriptive regarding heights for its own sake; rather it is the Council's intention to ensure that heritage assets are protected and where possible enhanced, and that development reflects the character of the area. Heights would therefore be considered as part of that assessment, and it is not considered necessary to specifically reference a restriction in the Site Allocation. | | | | | | |
| - | | | | | | | | | | Site Allocation 29: Homebase, Manor Road, North Sheen | | | | | | | |
| 259 | Chris Toop | Site Allocation 29 Homebase, Manor Road, North Sheen | | 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. | | The NPPF expects a Local Plan to optimise the use of land, expecting an uplift in density of residential development in city and town centres and other locations well served by transport. The Site Allocations are intended to identify sites across the Borough where development is likely or feasible to come forward, and are an opportunity for the Council to set out its aspirations for what that development should and could achieve, based on the context of the site and policies within the Local Plan. | | | | | | |
| 260 | Richard Carr, Transport for London (TfL) | 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 | | Support noted. |
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| 261 | David Wilson, Thames Water | Site Allocation 29 Homebase, Manor Road, North Sheen | | | | <p>Thames Water Site ID 53531 (PENDING - Reviewed 30/12/21)</p> <p>Water Response: 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>Waste Response: 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>Additional Comments: This is based on the site draining via infiltration..</p> | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| 262 | Craig Hatton, Network Rail (Southern) | Site Allocation 29 Homebase, Manor Road, North Sheen | | | | <p>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.</p> | The appropriate mechanism to secure transport improvements, to make a planning application acceptable in planning terms, is via planning obligations, which can be secured at full application stage. Whether the areas of improvement are within or outside of the Site Allocation boundary does not preclude this. See also response to comment 186. |
| 263 | Smruti Patel (Avison Young), Avanton Richmond Developments LTD | 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><u>CONTEXT OF THE REPRESENTATION (HOMEBASE, MANOR ROAD)</u></p> <p>This section summarises the site and surrounding area, planning history and the development proposals at Homebase, Manor Road, North Sheen.</p> <p>Site and Surrounding Area</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</p> | Comments noted. Justification for the approach is set out in the Urban Design Study. The Urban Design Study has followed a well-established methodology, and the findings of the characterisation study were used to identify capacity for growth and an overall development strategy, with the broad areas for tall and mid-rise buildings. Mid-Rise and Tall Building Zones are based on scenario testing of heights and their impacts on the surrounding townscape. The Urban Design Study references up to 8 storeys is to respect the small scale of the surrounding area – there are nearby 2-storey houses, particularly including locally listed residential terraces. With a robust evidence base, it is therefore considered there is an appropriate policy framework to assess proposals. See also response to comment 516 in relation to definition of appropriate heights in line with the London Plan. |

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| | | | | | <p>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>Planning History</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>Development Proposals</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> <p>Plan-Making Policy</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"> - 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, so that unmet need from neighbouring areas is accommodated where it is practical to do so and consistent with achieving sustainable development; - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; | |
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| | | | | | <p>- Effective – 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</p> <p>- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant. 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>COMMENTS ON DRAFT SITE ALLOCATION 29: HOMEBASE, MANOR ROAD, NORTH SHEEN</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>Building Heights</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><u>Urban Design Study (2023)</u></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> <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</p> | |
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| | | | | | <p>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 Appendix I) [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 Appendix II) 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. 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 19th 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.”</i> [our emphasis]</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. 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.</p> <p><u>Conclusion</u></p> | | |
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| | | | | | | 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. | | | | | | | | |
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| 264 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 609 in relation to this Site Allocation] | | Objection noted. The Council's response to the respondent's comment on the Regulation 18 Plan (comment 609) referred to the methodology underpinning the Urban Design Study and there is a mid-rise zone which provides a transition to the smaller scale of the surrounding area, with the updated Urban Design Study amended - the zone itself to set it further back from the building line on the NW border, to reduce the impact on the BTMs. | | | | | | |
| - | | | | | | Site Allocation 30: Sainsburys, Lower Richmond Road, Richmond | | | | | | | | |
| 265 | Richard Carr, Transport for London (TfL) | 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 | | Support for amendments made in response to Regulation 18 comments noted. Comments regarding car parking noted. The Council's response to this issue raised on the Regulation 18 Plan (comment 614) was that while there is an aim to reduce car dependency, car-parking provision would be assessed on a case by case basis and as stated in line with London Plan standards. See also response from Sainsbury's Supermarkets Ltd to the Regulation 19 consultation: comment 266. |
| 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 | | | | | | | | | | | | |
| 266 | Anna Stott (WSP), Sainsburys Supermarkets Ltd | Site Allocation 30 Sainsburys, Lower Richmond Road, Richmond | | No | Justified; Consistent with national policy | Draft Site Allocation 30 - Sainsburys, Lower Richmond Road, Richmond 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. | Comments noted. It is considered that these matters would be appropriately dealt with at full planning application stage. | | | | | | |
| 267 | Craig Hatton, Network | Site Allocation 30 | | | | 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 | Comments noted. Planning obligations are a mechanism to secure financial contributions to make a development | | | | | | |

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| | Rail (Southern) | Sainsburys, Lower Richmond Road, Richmond | | | | | | be made within this allocation to the level crossing and the potential to secure any further safety mitigations that may be required for this, because of development. | acceptable in planning terms, and would be dealt with at full planning application stage. See also response to comment 262. |
| 268 | David Wilson, Thames Water | Site Allocation 30 Sainsburys, Lower Richmond Road, Richmond | | | | | | <p>Thames Water Site ID 54334 (Reviewed Jan18)</p> <p>Water Response: 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 https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response: 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>Additional Comments: 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> | Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| 269 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 616 in relation to this Site Allocation] | The Council's response to the respondent's comment on the Regulation 18 Plan (comment 616) referred to the methodology underpinning the Urban Design Study and that the tall and mid-rise building zone is considered to be justified. |
| - | | | | | | | | Place-based Strategy for Kew | |
| 270 | Julie Scurr | Place-based Strategy for Kew | | | | | | Kew: 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. | Comments noted. Population growth has been lower than forecast, as set out at paragraph 2.23 of the Plan. Policy 49 requires major developments to assess potential impacts on existing infrastructure, with policing referred to in the Planning Obligations SPD and in the Infrastructure Delivery Plan. |
| - | Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer | Building Heights – Site Allocation 31 (Kew Retail Park), Place Based Strategy for Kew and Policy 45 | N o | N o | N o | 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] | See response to comment 508. |

| 271 | Craig Hatton, Network Rail (Southern) | 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. | | Support noted. | | | | | | |
|---|--|--|--|----|---------------------|--|---------|--|--|---|--|--|--|---|
| 272 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (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 Council's Statement of Consultation (June 2023) 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] | | Objection noted. The Council's response to the respondent's comments on the Regulation 18 Plan (comments 618 and 619) explained the methodology and reasoning for Old Deer Park being grouped into character area G1 and relating to the character areas in Richmond, Kew and North Sheen as set out in the Urban Design Study, and how the method for defining boundaries was informed by various sources of information but wherever possible followed conservation area boundaries. | | | | | | |
| 273 | Peter Willan and Paul Velluet, Old Deer Park Working Group | Place-based Strategy for Kew (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: 620... [See the Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 620 in relation to Old Deer Park] | | Objection noted. The Council's response to the respondent's comment on the Regulation 18 Plan (comment 620) explained the methodology and reasoning for Old Deer Park being grouped into character area G1 and relating to the character areas in Richmond, Kew and North Sheen as set out in the Urban Design Study, and how the method for defining boundaries was informed by various sources of information but wherever possible followed conservation area boundaries. | | | | | | |
| - | | | | | | Site Allocation 31: Kew Retail Park, Bessant Drive, Kew | | | | | | | | |
| 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. | | The NPPF expects a Local Plan to optimise the use of land, expecting an uplift in density of residential development in city and town centres and other locations well served by transport. The Site Allocations are intended to identify sites across the Borough where development is likely or feasible to come forward, and are an opportunity for the Council to set out its aspirations for what that development should and could achieve, based on the context of the site and policies within the Local Plan. | | | | | | |
| 275 | Tim Brennan, Historic England | 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. | | Comments noted. Tall Building Zones, and the stated maximum heights within them, are based on scenario testing carried out by Arup, which underpins the Urban Design Study. The Site Allocation and the thematic policies are considered to provide an appropriate framework to assess proposals. See response to comment 80. See also response to comment 506 in respect of mapping. | | | | | | |
| 276 | Richard Carr, Transport for London (TfL) | 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</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</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</td> </tr> </tbody> </table> | Section | Track change/comment – Reg. 18 | Updated track/change comment – Reg. 19 | Site Allocation 30 [now Site Allocation | 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</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 | | An Additional Modification can be considered to reflect the accurate PTAL rating. |
| Section | Track change/comment – Reg. 18 | Updated track/change comment – Reg. 19 | | | | | | | | | | | | |
| Site Allocation 30 [now Site Allocation | 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</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 | | | | | | | | | | | | |

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| | | | | | | | 31]: Kew Retail Park, Bessant Drive, Kew | <i>seek pre-application transport and highway safety advice from Borough and TfL Officers before writing their transport assessment.</i> | 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' | | Support for amendments made in response to Regulation 18 consultation comment noted. |
| 277 | Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer | Site Allocation 31 Kew Retail Park - introduction , retail matters | N o | N o | N o | Positively Prepared ; Justified; Effective; Consistent with national policy | <p>Introduction</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&S), who are the owners of the Kew Retail Park (KRP) site (referred to as the 'Landowners' from hereon). SG and M&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"> - Building Heights - Site Allocation 31(Kew Retail Park), Place Based Strategy for Kew and Policy 45 (Section 2) [See comment 508] - Site Allocation 31 (Kew Retail Park) – Retail Matters (Section 3) - Affordable Housing & Whole Plan Viability – Policy 11 (Section 4) [See comment 365] - 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] <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&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>Retail Matters – Site Allocation 31 Context (Regulation 18 Representations)</p> <p>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"> - 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; - The provision of an improved convenience retail offer (minimum 25,000sqft GIA) as part of a replacement M&S is required to make the Site available for development; - 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 | | | | <p>An Additional Modification can be considered to clarify that the expectation is that there should be no increase in the amount of convenience floorspace.</p> <p>The purpose of a Site Allocation (SA) is to set the framework for the development of a site. It follows that should a planning application be submitted not in full accordance with the SA, that it would be determined in the usual way being tested against national, regional and relevant plan policies including policies 17 & 18 and therefore repetition of reference to the national policy tests is unnecessary.</p> <p>It is not unreasonable for a Site Allocation to indicate a quantum of retail which is acceptable. In this case the cap relates to convenience provision in an out of centre location such that any proposal coming forward to increase convenience provision would need to satisfy the impact and sequential tests and other Plan policies and allow the Council to assess the impact of the substantially changed nature of the proposed development.</p> <p>The Site Allocation is positively prepared being informed by an extensive, robust and up-to-date evidence base.</p> <p>It is noted that there are conditions attached to the permission (99/2901) for Kew Retail Park which restrict an increase in convenience floorspace.</p> <p>In relation to the contention that an improved convenience offer is necessary to make the site available for development, the changes to the existing M&S store must still conform to policy requirements and the overall viability of the scheme including the changes to the M&S store and be independently assessed as part of any full application submitted to the Council.</p> <p>The Council does not accept that the Living Locally concept would encompass the provision of <u>main food shopping</u> opportunities for all residents within 20 minutes of their homes. Local shopping opportunities already exist at Kew Retail Park (and Kew Gardens local centre). Indeed, the evidence provided by the Retail and Leisure Study Phase 2 and the Assessment of Borough Centres in terms of</p> |

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| | | | | <p>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);</p> <ul style="list-style-type: none"> - 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 - Policies should be positively worded. <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>Regulation 19 Representations</p> <p>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 not positively prepared. It is not consistent with national policy, 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 not effective as it will render the KRP site allocation undeliverable owing to the commercial tests that M&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="715 821 1644 1188" 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="715 1234 1644 1486" 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> <p>We explain and justify our position below.</p> <p>Site Availability</p> <p>The availability of the KRP site for redevelopment is dependent on the provision of substantial replacement retail floorspace (a replacement M&S store).</p> <p>Consistency</p> <p>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.</p> <p>Need</p> <p>At the heart of planning system is the presumption in favour of sustainable development, which requires local plans to include polices 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.</p> | | <p>assessing and mapping available provision indicate that there is reasonable provision of local shopping opportunities across the borough.</p> <p>The GLA have not raised any conformity issues in relation to this Site Allocation or Policies 17 & 18.</p> <p>It is considered preferable to steer any expenditure generated from new development into the existing hierarchy of centres, with recognition that the top-up shopping at Kew Retail Park could meet the needs of the residential community living to its east including in and around Meliss Avenue.</p> <p>The impact on Kew Gardens centre is more appropriately tested at the planning application stage through a Retail Impact Assessment.</p> <p>See also responses to comments 388, 391 and 392.</p> |
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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.

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.

Regardless of the above query, what is clear from the 2023 Study is that **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**. 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.

Avison Young Assessment (2022)

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.

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:

Table 3.2 Convenience Goods Shopping Patterns (Zone 6 Residents)

| Question | Response (Zone 6 Residents) |
|---|--|
| Q.1 Where do you do most of your household's main food shopping? | 60% - Sainsbury's, Lower Richmond Road (Out-of-Centre) 9% - Waitrose, East Sheen (District Centre) 8% - Waitrose Richmond (Major Centre) 6% - Squires Food and Wine, Sandycombe Road (Local Centre) 5% - M&S Kew Retail Park (Out-of-Centre) 2% - Tesco Extra Twickenham (Out-of-Centre) 1% - Tesco Express, Kew Gardens (Local Centre) 9% - Other [67% out-of-centre/24% town centre] |
| Q.2 Apart from the store/centre mentioned at (1), where else do you regularly do a main food shop | 16% - Waitrose Richmond (Major Centre) 10% - M&S, Kew Retail Park (Out-of-Centre) 13% - Tesco Express, Kew Gardens (Local Centre) 12% - Tesco Extra, Mogden 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) [51% out-of-centre/49% town centre] |
| Q.3 Where do you do most of your household's small scale 'top-up' food shopping | 21% - Tesco Express, Kew Gardens (Local Centre) 15% - Sainsbury's Superstore, Lower Richmond Road (Out-of-Centre) 13% - M&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, Sandycombe Road (Local Centre) 4% - Kew Green (Local Centre) 3% - Kew Gardens (Local Centre) 2% - Lidl, South Road, Fulwell (Out-of-Centre) 2% - M&S Simply Food, Chiswick High Road, Chiswick (District Centre) [36% out-of-centre/57% town centre] |
| Q.4 Where else do you do most of your household's small scale top-up food shopping | 30% - M&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&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, Sandycombe Road (Local Centre) 1% - Kew Green (retailers not specified) (Local Centre) [43% out-of-centre/52% town centre] |

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| | | | | | <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.</p> <p>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.</p> <p>The AY household survey results indicate that of total convenience goods expenditure generated by residents of Kew/North Richmond wards (Zone 6):</p> <ul style="list-style-type: none"> - 58.5% is spent within Zone 6 itself, of which: <ul style="list-style-type: none"> o 9.1% is spent in town centres (numerous Local Centres, including Kew Gardens); and o 49.4% is spent in out-of-centre locations (principally Sainsbury's on Lower Richmond Road) - The remaining 41.5% is spent outside of the Zone: <ul style="list-style-type: none"> 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"> ▪ 12.6% is spent in town centres (the main food/grocery shopping destination within Zone 1 is Waitrose in Richmond Major Centre); and ▪ 0% is spent in out-of-centre locations 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"> ▪ 8.5% is spent in town centres (the main food/grocery shopping destination within Zone 7 is Waitrose in East Sheen District Centre); and ▪ 0% is spent in out-of-centre locations o 5.5% is spent elsewhere in the borough, of which: <ul style="list-style-type: none"> ▪ 1.9% is spent in town centres; and ▪ 3.6% is spent in out-of-centre locations. o 14.9% leaks out of the borough. <p>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&S at KRP are both popular destinations for top-up convenience shopping but attract limited main food shop market share.</p> <p>Sustainable Travel</p> <p>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 most residents tend to undertake their main food shopping trips by car. 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>Overtrading</p> <p>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).</p> <p>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.</p> <p>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 the food component of the M&S at Kew Retail Park is trading at significantly over company benchmark turnover levels. It is unable to provide an acceptable shopping experience as a consequence through overcrowding and congestion</p> | | |
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| | | | | | <p>within the store and the inability to ensure a consistent level of stock on the shelves to meet customer expectations.</p> <p>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&S itself.</p> <p>Town Centre Health</p> <p>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).</p> <p>The following details regarding Kew Gardens Local Centre are provided:</p> <ul style="list-style-type: none"> - 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. <p>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.</p> <p>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.</p> <p>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 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.</p> <p>The findings of the 2023 Study demonstrates that 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).</p> <p>Summary</p> <p>The availability of the KRP site for redevelopment is dependent on the provision of substantial replacement retail floorspace (a replacement M&S store), to include an enhanced foodhall offer. 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"> - 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. - 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). - The majority of food shopping undertaken by residents of Kew is being done at out-of-centre locations. - Most residents of the borough tend to undertake their main food shopping trips by car, which contributes to congestion and air quality issues. - Kew Gardens is a popular destination for top-up convenience shopping but attracts less than 4% of the main food market share. - The food component of the M&S at Kew Retail Park is trading at significantly over company benchmark turnover levels. <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).</p> <p>[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, | Site Allocation | | | Thames Water Site ID 75278 | Comments noted. Matters relating to drainage, water and wastewater |

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| | Thames Water | 31 Kew Retail Park, Bessant Drive, Kew | | | | | <p>Water Response: 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 https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response: 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 https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> | | infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| 279 | Rachel Holmes, Environment Agency | Site Allocation 31 Kew Retail Park, Bessant Drive, Kew | | | | | <p>Site allocation 31 – Mellis Avenue, Kew [note this Site Allocation is called Kew Retail Park, Bessant Drive, Kew]</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> | | Noted. |
| - | | | | | | | Site Allocation 32: Kew Biothane Plant, Melliss Avenue, Kew | | |
| 280 | Rachel Holmes, Environment Agency | Site Allocation 32 Kew Biothane Plant, Melliss Avenue, Kew | | | | | <p>Site Allocation 32 - Kew Biothane Plant, Melliss Avenue, Kew</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. 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> | | Comments noted. The Council's response to the EA's comment on the Regulation 18 Plan (comment 631) set out that any development would need to take into account the site's proximity to the River Thames and high risk of flooding, as the site constraints for flood risk are identified in the Site Allocation. |
| 281 | David Wilson, Thames Water | Site Allocation 32 Kew Biothane Plant, Melliss Avenue, Kew | | | | | <p>Thames Water Site ID 49790 (APPROVED - 16/09/20)</p> <p>Water Response: 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>Waste Response: 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>Additional Comments: 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> | | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| 282 | Saffron Frost (Savills), Melliss Ave Devco Limited (in Administrat | Site Allocation 32 Kew Biothane Plant, Melliss | N | N | Y | Justified; Effective | <p>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.</p> <p>Context</p> <p>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</p> | <p>Modifications Sought</p> <p>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:</p> <p><u>Range of Housing</u></p> | Site Allocations set out the framework for developing sites. It is reasonable to state that MOL should not be built on and that improvements to MOL are sought subject to national planning policy tests which is the essence of Policy 35. |

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| | ion) c/o RSM | Avenue, Kew | | | <p>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.</p> <p>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.</p> <p>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.</p> <p>As far as extra care housing, planning officers recognised in the 2018 permission that:</p> <p>(Committee Report para 9.36)</p> <p><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></p> <p>(Committee Report para 9.37)</p> <p><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></p> <p>(Committee Report para 9.40)</p> <p><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></p> | <p><i>The Council will support redevelopment of this site to provide for residential uses, including affordable housing, and associated open space provision.</i></p> <p><u>To</u></p> <p><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></p> <p>This change is needed so that the vision is consistent with Local Plan Policy 12 - Housing Needs of Different Groups</p> <p>Policy 12 Part – B states that <i>"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."</i></p> <p>And in justification paragraph 17.44</p> <p><i>"The Council's identified priorities for new specialist housing development, at the time of writing, include:</i></p> <p><i>-Extra care and supported living provision including developing more specialist provision for service users with complex, high-level needs and challenging."</i></p> <p>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.</p> <p><u>Metropolitan Open Land</u></p> <ul style="list-style-type: none"> <i>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.</i> <p><u>To</u></p> <ul style="list-style-type: none"> <i>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.</i> <p>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.</p> <p>Policy 35 - Part A states the following :</p> <p><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></p> <p>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.</p> <p>The vision then goes to state –</p> <p><i>There is an expectation that any redevelopment proposal improves the character and openness of the MOL.</i></p> <p>Again, this is an unreasonable requirement that does align with Policy 35.</p> <p>Policy Part C, is written as follows:</p> <p><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></p> <p>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:</p> <p>a – it does not allow proposals even when 'Very Special Circumstances' apply (which we maintain is unreasonable).</p> | <p>Should an application come forward which would be contrary to the policy's aims, the Council would then need to decide whether a robust case for Very Special Circumstances (VSCs) had been successfully made, taking into account all factors.</p> <p>Policy 35 Part A refers directly to VSCs.</p> |
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| | | | | | | | | | 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. | |
| - | | | | | | | | | Site Allocation 33: Pools on the Park and surroundings, Old Deer Park, Richmond | |
| 283 | David Wilson, Thames Water | Site Allocation 33 Pools on the Park and surroundings, Old Deer Park, Richmond | | | | | | | Thames Water Site ID 75279 Water Response: 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. Waste Response: 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. Additional Comments: To provide a more detailed response we will require information on the scale of development. | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| 284 | Peter Willan and Paul Velluet, Old Deer Park Working Group | 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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 634 in relation to this Site Allocation] | Objection noted. The Council’s response to the ODPWG’s comment on the Regulation 18 Plan (comment 634) was that it is clear the Statement of Significance referred to is a draft, and it is not considered that the site would score sufficiently highly against the criteria used in the Open Land Review and consequently there are no plans to extend the surrounding MOL designation. |
| - | | | | | | | | | Site Allocation 34: Richmond Athletic Association Ground, Old Deer Park, Richmond | |
| 285 | David Wilson, Thames Water | Site Allocation 34 Richmond Athletic Association Ground, Old Deer Park, Richmond | | | | | | | Thames Water Site ID 75281 Water Response: 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. Waste Response: 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. Additional Comments: To provide a more detailed response we will require information on the scale of development. | Comments noted. The Site Allocations were reformatted in the Regulation 19 Plan to include additional details including constraints where known. The Site Allocations set out a vision, but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| 286 | Jo Edwards, Sport England | Site Allocation 34 Richmond Athletic Association Ground, Old Deer Park, Richmond | | | | | | | support vision retention / improvement of playing field | Support noted. |

| | | Place-based Strategy for Mortlake & East Sheen | | | | | | | | | | |
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| 287 | Richard Carr, Transport for London (TfL) | Place Based Strategy for Mortlake and East Sheen Other Initiatives | | | | No comments. | | | | | | |
| | | | <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. | | | | |
| 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. | | | | | | | | | | | |
| 288 | Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common | Place-based Strategy for Mortlake and East Sheen | | | | <p>Comments noted.</p> <p>See also response to comment 76 in relation to Chertsey Court.</p> <p>See also response to comment 530 in relation to Policy 47 and transport.</p> <p>A green link bridge connecting the north and south towpaths is not identified in any plans from TfL, and officers are not aware of any available capital funding; developer contributions from site development is not considered likely to be justified through the number of additional pedestrian and cycle trips. Therefore it would not be appropriate to reference a requirement for a new green bridge in this location in the Place-based strategy for the area, given that at this point in time it is not feasible or likely to come forward in the near future.</p> <p>While the place-based strategies have been informed by a variety of sources and include a vision and objectives for each area, some of the language and initiatives suggested for inclusion are not considered appropriate for inclusion in a Local Plan, such as name of a children’s centre or the need for new lifts in existing residential.</p> | | | | | | |
| | | | <p>4. Section 13. Place Based Strategy for Mortlake & East Sheen Pg 122-135</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 & Barnes Common. Given the planned development, around the locality, it was important that the plan accurately portrayed Mortlake & 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. Reasons for the proposed amendments - 1</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>c. Relevant Policies and other evidence</p> <table border="1"> <tbody> <tr> <td>National Planning Policy (NPPF) Framework 2021 – Plan making and delivery</td> <td> <p>Preparing and reviewing plans</p> <p>31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.</p> <p>32. 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| | | | | <p>a. Local Plan proposed amendments - 1</p> <p>‘Local Plan Policy 17.7</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> | | | | | | | | |
| | | | | <p>13 Place-based Strategy for Mortlake & East Sheen</p> <p>Place-based Strategy for Mortlake & East Sheen</p> <p>Area Profile</p> <p>The Mortlake & 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 few decades, in anticipation of the regeneration on the STAG Brewery site.</u> There is currently is a neighbourhood centre at White Hart Lane.</p> | | | | | | | | |

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| | | | | | <p>comment 76 in relation to Site Allocation omission site Chertsey Court, Mortlake].</p> | <p>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 barriers to movement 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 <u>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.</u></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>Overall strategy</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>Other initiatives</p> <p>The Council works with the East Sheen Business and Retail Association (ESBRA) who work closely with the community dealing with local issues</p> | |
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| | <p>such as parking and funding new and exciting projects, breathing life into Sheen living for all.</p> <p><u>Local shop owners along White Hart Lane work with the Barnes Community planning team, to develop ways of enhancing the area. This work should be extended along Mortlake High Street and Lower Richmond Road including the shops between Hanson Close and Kingsway.</u></p> <p>Transport for London's Cycling Action Plan has highlighted opportunities for additional cycle corridors and identified a top potential route through Sheen and Mortlake into the neighbouring borough of Wandsworth and to safely connect Mortlake with Richmond, Kew, Barnes, Putney and Chiswick by investing in towpath improvements.</p> <p>Vision</p> <p>The vision for Mortlake is to create a new focus to the village by redevelopment of the Stag Brewery site, creating a recreational and living quarter and a green link between Mortlake Station the village and the riverside and to also enhance the environment around the existing 3,000 homes, by investing in more badly needed transport, social and community infrastructure.</p> <p>The vision for East Sheen is to retain the established character of the area, to maintain and enhance the district centre, providing shops, services services, and employment for the local communities.</p> <p>There is also the potential to make Milestone Green the centre of East Sheen.</p> <p>Policy</p> <p>Future development in this place is expected to:</p> <ul style="list-style-type: none"> • Contribute to a sense of activity and vibrancy in the town and neighbourhood centres, retaining the mix of uses including restaurants, cafes and pubs along Sheen Lane and along at the junction of Mortlake High Street, Lower Richmond Road and White Hart Lane, to maintain a sense of activity and vibrancy, and encourage independent shops and businesses, emphasising local makers and artisans. Encourage reinstatement of shop fronts' original design to achieve consistency in appearance in East Sheen Town Centre. • Enhance the sense of arrival and quality of the public realm at Mortlake Station, through opportunities for art and wayfinding and improvement of the facilities at the station, Mortlake Green and adjacent playground. • Incorporate focal points and establish distinctive landmarks, without recourse to tall buildings, including in East Sheen Town Centre to enhance the sense of place and the area's identity as a destination such as the space around the war memorial. • Contribute to creating a 'centre' for East Sheen at Milestone Green. • Enhance the public realm and create public areas for dwelling and "spill-out", rather than just narrow, transient spaces, using high quality street furniture, and increase greening through tree planting and verges in Mortlake High street, Lower Richmond Road and White Hart Lane. . • Create sense of pride in the Mortlake area by coming up with a name for the Barnes Children's centre that celebrates the fact that this is in Mortlake, not Barnes. • Ensure new development along the river contributes to its valued leisure functions as well as positively addressing Mortlake High Street and Lower Richmond Road. Enhance local distinctiveness around Mortlake Riverside using its relationship with the river and historic industry. • Enhance continuity, connectedness and legibility of the Thames Path route, to improve connectivity with the wider area, if feasible by a green link bridge connecting the north and south towpaths. • At East Sheen Parkside, enhance the quality and biodiversity of East Sheen Common and ensure green infrastructure is physically connected, notably along Fife Road, The Mall, and Spencer Gardens, and improve boundary treatments and interface with Christ's School. • Consider opportunities to reduce the perceived dominance of vehicles, promoting active travel with space to create café seating areas and improve pedestrian, cyclist and scooter experience in East Sheen Town Centre and throughout at Mortlake Riverside and in particular at the busy | |
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| | | | | | | | <p>junctions around Chalker's Corner and along the heavily congested Lower and Upper Richmond Roads, A316 and A205.</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 mixed-use mixed-use 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>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.</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>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.</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"> • Stag Brewery, Lower Richmond Road, Mortlake • Chertsey Court, Lower Richmond Road, Mortlake • Mortlake and Barnes Delivery Office, Mortlake • Telephone Exchange and 172-176 Upper Richmond Road West, • East Sheen Barnes Hospital, East Sheen | |
| 289 | Katherine Drew, The Royal Parks | Place-based Strategy for Mortlake & East Sheen - specific to biodiversity | | | | <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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 642 in relation to recognising designations and protections of the Parks]</p> | <p>The Council's response to the respondent's comments on the Regulation 18 Plan (comment 642) was to note that the place-making strategy references that the area is located between Richmond Park and the River Thames; however, Richmond Park is</p> | |

| | | and the Royal Parks' Environmental Designations | | | | | | | located within a separate place-making strategy (Ham, Petersham & Richmond Park), where the nature conservation designations are listed. It was therefore not necessary to mention them again here. | | | | | | | |
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| 290 | Craig Hatton, Network Rail (Southern) | 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 'actively promote improved access to the rail network for all users' 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. | See response to comment 186. | | | | | | |
| 291 | Rachel Holmes, Environment Agency | Place-based Strategy for Mortlake & East Sheen | | | | | | Place-based strategy for Mortlake & East Sheen 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. | | Support noted. | | | | | | |
| - | | | | | | | | Site Allocation 35: Stag Brewery, Lower Richmond Road, Mortlake | | | | | | | | |
| 292 | Tim Brennan, Historic England | 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. | | Comments noted. The 'context' section of the Site Allocation texts list the heritage assets and sensitivities on-site and within the surrounding area, and the 'Vision' section sets out the requirement to have regard to the relevant sections of the Urban Design Study. The Site Allocation and the thematic policies are considered to provide an appropriate framework to assess proposals. See response to comment 80. | | | | | | |
| 293 | Richard Carr, Transport for London (TfL) | 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 '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.' 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 '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.' 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.' | | The Council's response to TfL's comment on the Regulation 18 Plan (comment 649) set out the link to the SPD on the site although noted the uncertainty around wider bus services in the area since Hammersmith Bridge was closed for repairs and the possible options, suggesting no amendments to the Site Allocation necessary as there is flexibility for a design-led transport solution informed by liaison with TfL at full planning stage. Since then, planning applications refs. 22/0900/OUT and 22/0902/FUL have received resolution to grant permission from Richmond Planning Committee on 19/07/2023, subject to referral to the GLA and a legal agreement. TfL commented on the applications as a statutory consultee. TfL's revised comments to the application following the provision of further information advised that further detailed design details be agreed via further discussions, to be secured by either condition or S106 agreement, and overall support for the opportunity to deliver a bus driver facility to support the existing bus stands on Mortlake High Street. Applications are due to be reconsidered following amendments to the proposals to address fire safety. It is considered that the matters raised by TfL to the Regulation 19 |
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| | | | | | | | | | Local Plan consultation can continue to be addressed at planning application stage, and no wording to the Site Allocation is necessary. |
| 294 | Jo Edwards, Sport England | Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake | | | | | support retention / reprovision of play field in vision | | Support noted. |
| 295 | David Wilson, Thames Water | Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake | | | | | <p>Thames Water Site ID 65562 (Pending)</p> <p>Water Response: 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 https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Waste Response: 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 https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p> <p>Additional Comments: 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> | | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| 296 | Craig Hatton, Network Rail (Southern) | Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake | | | | 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. | 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. 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. | See response to comment 186. Matters relating to the level crossing would be dealt with at full planning application stage, as was the case regarding the recent assessment of application refs. 22/0900/OUT and 22/0902/FUL, for which officers recommended planning obligations to secure the necessary improvements (and for which Richmond Planning Committee resolved to grant planning permission on 19/07/2023 (see comment 293 for the full position on the applications)). | |
| 297 | Tim Catchpole, Mortlake with East Sheen Society | Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake | | | | <p>Site allocation 34: The Stag Brewery</p> <p>[See the Council's Statement of Consultation (June 2023) 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> | | Support for recommended maximum height within Tall Building Zone noted. With regards the need for a new school on the site, the Council responded to this matter in depth in its responses to comments on the Regulation 18 Plan (in particular comment 639). This outlines justification for the approach as set out in the Council's School Place Planning Strategy March 2023. It is also worth | |

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| | | | | | | | | | | | | | noting that planning applications 22/0900/OUT and 22/0902/FUL, which include a new secondary school as part of redevelopment of the site, were granted resolution to approve planning permission by Richmond Planning Committee 19/07/2023 (see comment 293 for the full position on the applications). |
| 298 | Rachel Holmes, Environment Agency | Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake | | | | | | | | Site Allocation 35 - Stag Brewery, Lower Richmond Road, Mortlake 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. 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. 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. | | | Comments noted. The Council's response to the EA's comment on the Regulation 18 Plan (comment 657) set out that the site constraints for flood risk are identified in the Site Allocation and flood risk matters are covered in Policy 8, therefore an application would be expected to address requirements. |
| 299 | Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common | Site Allocation 35 Stag Brewery, Lower Richmond Road, Mortlake | | | | | | | | [See modifications considered necessary]. | | | Comments noted. These matters can be assessed against other policies in the Local Plan at full planning stage, which is considered to be the appropriate approach. |
| | | | | | | | | | | | | | <p>Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake Site Proposal</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 a new <u>new 6-form entry secondary school, if capacity is required plus sixth form, will be required.</u> Appropriate uses, in addition to educational, include residential (including <u>3+ bed affordable housing for social rent</u>), employment, commercial such as retail and other employment generating uses, <u>additional health facilities 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 accessible green space link to the riverside, <u>and if feasible a green link bridge between the north and south Thames towpath.</u></p> <p>Context</p> <ul style="list-style-type: none"> • The Council has produced and adopted the Stag Brewery Planning Brief SPD in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities. Any proposed development should have due regard to the adopted brief. • The brewery operations on this site ceased at the end of 2015; the site has been marketed and sold <u>and is currently being leased as a film studio, further establishing the creative industries in Richmond.</u> • There is a need to create a new heart for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities. • There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area, as set out in the Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school. • Whilst this site is not located within a town centre, it falls within the Mortlake Area of Mixed Use. Therefore, it is expected that this site will provide a substantial mix of employment uses, including lower cost units suitable for small businesses, creative industries and scientific and technical businesses including green technology. Other employment generating uses will also be supported. |

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| | | | | | | | <ul style="list-style-type: none">• Retail and other commercial uses, such as cafés and restaurants, will add to the vibrancy of the new centre as well as contributing to the provision of important local employment opportunities.• Incorporating a mix of uses, including social infrastructure and community as well as leisure, sport and health uses, and attractive frontages should contribute to creating an inviting and vibrant new centre.• The provision of residential uses (including policy compliant affordable housing) will ensure that the new heart of Mortlake becomes a vibrant centre for new communities.• The site is within an Archaeological Priority Area and partially within the Mortlake Conservation Area. The existing Buildings of Townscape Merit should be retained; the reuse of these historic buildings offers an excellent opportunity to ensure the site incorporates and promotes a cultural and historic legacy, for example by providing an on-site museum. Any development should respond positively to the Conservation Area, including the setting of the listed buildings (Grade II) to the north of the site.• The site is very close to an Air Quality Focus Area. In addition to the development having to achieve “Air Quality Positive”, strict mitigation measures will be required, both to mitigate any effect on current receptors and highways and on future receptors within the proposed development, particularly for sensitive receptors, such as pupils at the secondary school <u>and residents in the new flats, particularly those adjacent to the very congested Lower Richmond Road, A316 and Mortlake High street.</u>• Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community.• The playing fields in the south west corner of the site, which are designated Other Open Land of Townscape Importance (OOLTI), should be retained and/or reprovided and upgraded. In the event of reprovion and upgrading, where a comprehensive approach to redevelopment can be taken in line with Policy 36, it may be acceptable to re-distribute designated OOLTI within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness <u>and retains use for sport and recreation activities, rather than strips of green between buildings, resulting in the loss of 62% of the OOLTI green space.</u> In addition, reprovion and upgrading of the playing fields within the site for sport uses has to be carried out in line with Policy 37, the NPPF and Sport England Policy.• 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 <u>(rail and buses), active travel (bike, scooter etc) and pedestrian safety facilities,</u> 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, <u>but not if it results in the removal of additional green space in the development.</u>• 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.• 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 <p>Ownership:(public/private/mixed/unknown) Private</p> | |
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| - | Smruti Patel (Avison Young), Avanton Richmond Developments LTD | | | | | | | | [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] | | - |
| - | | | | | | | | | Site Allocation 36: Mortlake and Barnes Delivery Office, Mortlake | | |
| 300 | David Wilson, Thames Water | Site Allocation 36 Mortlake and Barnes Delivery Office, Mortlake | | | | | | | Thames Water Site ID 41237 (Reviewed Oct17) Water Response: 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 Waste Response: 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 Additional Comments: 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. | | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| - | | | | | | | | | Site Allocation 37: Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen | | |
| 301 | David Wilson, Thames Water | Site Allocation 37 Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen | | | | | | | Thames Water Site ID 49791 (Reviewed Jan18) Water Response: 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 Waste Response: 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 Additional Comments: 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. | | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered necessary to reference these in the Site Allocation text. |
| - | | | | | | | | | Site Allocation 38: Barnes Hospital, East Sheen | | |
| 302 | David Wilson, Thames Water | Site Allocation 38 Barnes Hospital, East Sheen | | | | | | | Thames Water Site ID 24141 (Allocated site pending, Reviewed 10/12/21) Water Response: 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 | | Comments noted. Matters relating to drainage, water and wastewater infrastructure would be considered at application stage and it is not considered |

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| | | | | | | <p>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>Waste Response: 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>Additional Comments: 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> | | necessary to reference these in the Site Allocation text. |
| 303 | Rachel Holmes, Environment Agency | Site Allocation 38 Barnes Hospital, East Sheen | | | | <p>Site allocation 37 - Barnes Hospital, Mortlake and East Sheen: [now Site Allocation 38]</p> <p>We welcome that reference to our intention to update the flood risk modelling has been noted as part of this site allocation.</p> | | Support noted. |
| - | | | | | | Place-based Strategy for Barnes | | |
| 304 | Craig Hatton, Network Rail (Southern) | Place-based strategy for Barnes | | | | <p>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.</p> | | Support noted. See also response to comment 186. |
| 305 | Rachel Holmes, Environment Agency | Place-based Strategy for Barnes | | | | <p>Place-based strategy for Barnes</p> <p>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.</p> | | Support noted. |
| - | | | | | | Policies | | |
| 306 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green) | General - Policies | | | | <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: ... 673...</p> <p>[See the Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 673 in relation to this heading]</p> | | Noted. This comment related to the section on 'Policies' not containing any text, which in the format of the Regulation 19 Plan no longer appears on a separate page. |
| 307 | Peter Willan and Paul Velluet, Old Deer Park Working Group | General - Policies | | | | <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: 674...</p> <p>[See the Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 674 in relation to this heading]</p> | | Noted. This comment related to the section on 'Policies' not containing any text, which in the format of the Regulation 19 Plan no longer appears on a separate page. |
| - | | | | | | Responding to the climate emergency and taking action | | |
| 308 | Tim Brennan, Historic England | Responding to the climate emergency and taking action | | | | <p>Chapter 16</p> <p>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</p> | | Support and comment noted. In determining a planning application, the Council has regard to the Local Plan as a whole and the policy requirements of Chapter 16 responding to the climate emergency and Chapter 20 seeking to protect and improve heritage assets would form part of that consideration. The bullet points listed are addressed in Policy 29 Part F and para 20.36. Paragraph 16.16 in the |

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| | | | | | | | 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"> • The importance of ongoing maintenance as a method of both monitoring energy performance of existing buildings and ensuring its effectiveness • Adopting an approach that as a starting point is iterative and looks for lower cost and minimally invasive interventions • Emphasising that small scale changes, such as secondary glazing and window and door repair, can deliver significant benefits. | | supporting text to Policy 4 also emphasises the possible impacts on heritage assets and how there is no one-size-fits-all approach. |
| 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. | Comment noted. Richmond Council have declared a climate emergency and intend to address the effects of climate change through a variety of methods to become a net-zero carbon borough by 2043 at the latest. The London Plan also requires Local Plans to respond to policy aspects related to climate change, building on the Mayor’s ambitious plans. The Net Zero Carbon Study was produced to understand what net zero carbon standards could be achieved and justifies the policies are feasible and deliverable. See also response to comment 1. |
| 310 | Tim Catchpole, Mortlake with East Sheen Society | | | | | | Theme: Responding to the climate emergency and taking action (Policies 3-9) [See the Council's Statement of Consultation (June 2023) 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. | | Comment noted. The Council’s response to the respondent’s comments on the Regulation 18 Plan (683, 689, 696, 697, 708, and 711) relating to decentralised energy networks, water resources and aspects of flood risk including storm surges were not considered to require any change. The Council’s response remains the same. |
| - | | | | | | | Policy 3. Tackling the Climate Emergency (Strategic Policy) | | |
| 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. | Comment noted. Policy 3 B11 and paragraphs 16.6 to 16.8 recognise that extensive retrofitting will be required to decarbonise Richmond’s existing building stock and will actively promote retrofitting of existing buildings through low-carbon measures. The addition of ‘and water’ can be considered as an Additional Modification to part D of the policy, to reflect the Council’s aspiration for joint working. |
| 312 | James Stevens, Home Builders Federation | Policy 3 Tackling the Climate Emergency (Strategic Policy) | | No | | Effective | <u>Part B of the policy is unsound because it is imprecise and so it is ineffective.</u> 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. | | Comment noted. Policy 3 is the strategic overarching policy, and Part B 1 is further supported by Policy 4 Part B, and paragraphs 16.10 and 16.14. |
| 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> | Recommended action: For information only, no action required. | Support noted. |

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| | | | | | | | 7. adopt an integrated approach to water management which considers flood risk and flood storage, sustainable drainage, water efficiency, water quality and biodiversity;' | | |
| 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). | | Support noted. |
| 315 | Rachel Holmes, Environment Agency | Policy 3 Tackling the Climate Emergency (Strategic Policy) | | | | | As mentioned in our Regulation 18 response [See the Council's Statement of Consultation (June 2023) 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. 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. | | Comment noted. The Council's response to the EA's comments on the Regulation 18 Plan (comment 686) was this is covered in the Plan as a whole. The existing reference in Policy 3 along with Section 21, particularly paragraphs 21.6 and 21.7, and Policy 39 Biodiversity and Geodiversity is considered sufficient in conveying the link between climate change and biodiversity. Richmond Council have declared a climate emergency and intend to address the effects of climate change through a variety of methods. |
| 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. | Comment noted. Policy 3 recognises that extensive retrofitting will be required to decarbonise Richmond's existing building stock and will actively promote retrofitting of existing buildings through low-carbon measures. There is no one-size-fits all approach or solution to accommodating sustainable energy measures in the historic environment, and further details were added in the Regulation 19 Plan to the supporting text of Policy 4 and Policy 29 Part F and para 20.36 to recognise this conflict and how it is expected to be addressed on a case by case basis. |
| - | 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] | | See response to comment 309. |
| - | | | | | | | Policy 4. Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy) | | |
| 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 | Comment noted. Policy 4 requires all development to reduce greenhouse gas emissions on-site in accordance with the London Plan's Energy Hierarchy. All development includes development proposals for retrofitting. This would apply in conjunction with Policy 3 and paragraphs 16.6 to 16.8 also discuss retrofitting. |
| 318 | James Stevens, Home Builders Federation | Policy 4 Minimising Greenhouse Gas Emissions and | | No | | Justified | <u>The policy is unsound because it is ineffective and unjustified.</u> 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. 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 | | Comment noted. Richmond Council have declared a climate emergency and aim to become a net-zero borough by 2043 at the latest. The Council is addressing the effects of climate change through a variety of methods. Policy 4 is in accordance with |

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| | | Promoting Energy Efficiency (Strategic Policy) | | | <p>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.</p> <p>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 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</p> | | <p>London Plan SI 2 and the energy hierarchy. To support these ambitious policies the Council prepared the Net Zero Carbon Study. Multiple typologies of residential and non-residential developments, specific to Richmond, were prepared and assessed to understand what net zero carbon standards could be achieved and justifies the policies in the Plan are feasible and deliverable. The viability of the Plan has been assessed in the Whole Plan Viability Assessment 2023.</p> |
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| | | | | | <p>embodied carbon requirement causes a number of viable schemes to become unviable. In the same paragraph the report observes: 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. 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. 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. Specifically, as the Panel observed at para.84: <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> 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. As London Plan Policy DF1 states at part D: <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> 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.</p> | |
| 319 | Smruti Patel (Avison Young), Avanton Richmond Developments LTD | Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy) | 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. 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. The price set should not put an unreasonable burden on development and must enable schemes to remain viable.” 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. 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</p> | <p>Comments noted. Addressing the impacts of climate change through the development of more efficient and sustainable homes is a key priority for the Council. To support these ambitious policies the Council prepared the Net Zero Carbon Study, which has assessed the deliverability and feasibility of these policy requirements and found that the minimum on-site carbon reductions and carbon offsetting requirements are achievable, including for small sites. The requirements have also been tested as part of the Whole Plan Viability Assessment, which overall considered the cumulative impact of policies. The modelling of Policy 4 considers on-site delivery, as stated in Policy 4 it is to incentivise developers to implement on-site lower carbon strategies where possible. Policy 4 E also states that ‘the</p> |

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| | | | | | | | <p>requirements set out in LBRuT's draft policy 11 for the provision of all major residential development to bring forward 50% affordable housing as a minimum 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> | | price for offsetting carbon is regularly reviewed. Any changes to Richmond's suggested carbon offset price will be updated in future guidance'. |
| 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 | N | N | N | 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>Explanation</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 representative of current industry practices and therefore places an unreasonable burden on developments and would jeopardise the viability of future schemes.</p> <p>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." 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.</p> | <p>Recommendation</p> <p>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).</p> | <p>Comments noted.</p> <p>An Additional Modification to correct the error regarding TM59 and TM52 can be considered.</p> <p>See response to comment 319 in relation to the evidence base and carbon offsetting.</p> |
| 321 | Summer Wong (RPS), | Policy 4 Minimising | N | N | N | Positively Prepared | <p>Policy 4 Minimising Greenhouse gas Emissions and Promoting Energy Efficiency (Strategic Policy) (p.186-187)</p> | <p>Recommended Amendment</p> | <p>See response to comment 319.</p> |

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| | Notting Hill Genesis | Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy) (p.186-187) | | | ; | Justified; Effective; Consistent with national policy | <p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p> | <p>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.</p> <p>Policy 4 Part D) <i>New-build residential 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:</i></p> <p>1) to achieve net-zero carbon with a minimum of 60% 35% on-site reduction.</p> <p>Policy 4 Part E) Carbon offset rate to be amended from £300/t to £95/t as at 2021.</p> | |
| 322 | Neil Henderson (Gerald Eve), Reselton Properties | Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy) | | No | Positively Prepared | Justified; Effective; Consistent with national policy | <p>We wish to reiterate our comments made in Response to the Regulation 18 Consultation process, dated 31 January 2023.</p> <p>[See the Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 688 in relation to Policy 4]</p> | <p>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.</p> | <p>The Council's response to the respondent's comment on the Regulation 18 Plan (comment 688) acknowledged that addressing the impacts of climate change through the development of more efficient and sustainable homes is a key priority for the Council. The Net Zero Carbon Study assessed the deliverability and feasibility of these policy requirements and found that the minimum on-site carbon reductions and carbon offsetting requirements are achievable. The requirements have also been tested as part of the Whole Plan Viability Assessment, which overall considered the cumulative impact of policies. The modelling of Policy 4 considers on-site delivery, as stated in Policy 4 it is to incentivise developers to implement on-site lower carbon strategies where possible. Payments in lieu with regard to carbon offsetting will be used to implement projects to reduce carbon emissions across the borough as established in Policy 3 Tackling the Climate Emergency (Strategic Policy) Part D.</p> |
| 323 | Natasha Styles (The Planning Bureau Limited), McCarthy & Stone Retirement Lifestyles Ltd | Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy) | | | | | <p>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.</p> <p>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</p> | <p>Recommendation:</p> <ul style="list-style-type: none"> • That the policy is re-worded and stepped in line with emerging government targets • Policy 4 and 6 are combined for clarification. or • The policy is deleted as Net Zero Carbon development is to be dealt with via the Building Regulations. | <p>Comments noted. In Policy 4 Part D 1 the 60% refers to 60% improvement over Building regulations Part L. Regarding carbon offsetting, please see response 319.</p> <p>Policy 4 and Policy 6 are considered distinct. Policy 4 refers to minimising carbon emissions and energy efficiency, and Policy 6 refers to sustainable construction standards.</p> |

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| | | | | | | | 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. | | |
| 324 | Henry Brown (The Planning Lab), Royal Botanic Gardens Kew | Paragraph 16.16 | Yes | No | Yes | Effective; Consistent with national policy | 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 Gardens and so we would be grateful for some further information on the programme for progressing this and opportunities to be involved. | | Comment and interest noted. |
| - | Tim Brennan, Historic England | Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy) | | | | | [See comment 308 in relation to Policy 4] | | See response to comment 308. |
| - | 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] | | See response to comment 309. |
| - | | | | | | | Policy 5. Energy Infrastructure (Strategic Policy) | | |
| - | 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] | | See response to comment 309. |
| - | | | | | | | Policy 6. Sustainable Construction Standards | | |
| 325 | David Wilson, Thames Water | Policy 6 Sustainable Construction Standards | | No | | Consistent with national policy | Policy 6. Water Efficiency/Climate Change Comments 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: • Reduce leakage by 50% by 2050 • Roll out smart meters to all household and non-household connections by 2035; and • Deliver large scale water efficiency interventions across household and non-household properties to achieve Water Resource Management Plan targets. Therefore water efficiency measures employed in new development are an important tool to help us sustain water supplies for the long term. 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 | We therefore consider that text in line with the following should be included in Policy 6: "Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM 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." | Support and comments noted. Policy 6 Part A. 4. States 'Development 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)'. 110 litres is the optional requirement specified in Building Regulations G2. The optional requirement is justified in 16.40, including the requirement to meet BREEAM water-efficiency credits. The optional requirement is referenced in 16.40, including the requirement to meet BREEAM water-efficiency credits. |

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| | | | | | | <p>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: https://www.thameswater.co.uk/Be-water-smart</p> <p>It is our understanding that the water efficiency standards of 110 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (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 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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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. <p>Further details available at: https://www.thameswater.co.uk/about-us/newsroom/latest-news/2022/feb/rewards-for-developers-who-achieve-water-neutrality</p> <p>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.</p> | | An Additional Modification could be considered to clarify the details of the approach to the water consumption target and the water efficiency standards, and reference that this is secured through a condition which is then implemented through Building Control. | |
| 326 | Elena Mikhaylova | Policy 6 Sustainable Construction Standards | N | N | N | Positively Prepared ; Effective; Justified; Consistent with national policy | <p>"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)."</p> <p>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.</p> | All policies mentioned in my comments above must be cancelled immediately. | Comment noted. Policy 6 Part A 4 is in accordance with Building Regulations (2015 edition with 2016 amendments) G2 in relation to water efficiency. |
| 327 | Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer | Policy 6 Sustainable Construction Standards | N | N | N | Positively Prepared ; Justified; Effective; Consistent with national policy | <p>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:</p> <p>Explanation</p> <p>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.</p> | Recommendation 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. | Comment noted. Richmond Council have declared a climate emergency and aim to become a net zero borough by 2043. The Council is addressing the effects of climate change through a variety of methods, including the decarbonisation of buildings. This approach also fits with the Mayor of London's pathway to net zero and the focus on moving to low or zero-carbon heat sources. New buildings built now with new gas boilers are likely to need to be replaced in the next 10-30 years with a low carbon heating system, which would be more expensive than designing and constructing them to the right standard now. |
| 328 | Summer Wong (RPS), Notting Hill Genesis | Policy 6 Sustainable Construction Standards (p.192) | N | N | N | Positively Prepared ; Justified; Effective; Consistent with | <p>Policy 6 Sustainability Construction Standards (p.192)</p> <p>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.</p> <p>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</p> | Recommended Amendment 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</i> | Comment noted. Following the completion of the Council's Net Zero Carbon Study, BREEAM requirements were amended in the Regulation 19 Plan to require evidence by an accredited assessor if a development is unable to achieve Outstanding; in this |

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| | | | | | national policy | '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. | accredited BREEAM assessor that achieving ' Outstanding ' ' Excellent ' is not technically feasible than ' Excellent ' ' Very Good ' would be acceptable. Policy 6 Part A) Point 6) 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. Policy 6 Part A) Point 7) 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. | instance BREEAM Excellent would be supported. |
| - | 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 | | See response to comment 323. |
| - | | | | | | Policy 7. Waste and the Circular Economy (Strategic Policy) | | |
| 329 | Philip Villars, PMV Planning Limited on behalf of owner of Arlington Works | Policy 7 Waste and the Circular Economy (Strategic Policy) Site Allocation omission: Arlington Works | | No | | <p>Richmond Local Plan 'The best for our borough' Draft for consultation (Regulation 19)</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. 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. 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. [See the Council's Statement of Consultation (June 2023) 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. 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>"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."</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>Comments noted.</p> <p>It is anticipated that an updated version of the Waste Sites AMR will be published early in 2024.</p> <p>An updated LDS has recently been published, which includes the anticipated timetable for the review of the West London Waste Plan. Working groups are established and initial preparatory work is underway, consultants are due to be appointed soon with baseline data and a call for sites due to take place in 2024.</p> <p>Part of the Arlington Works site is safeguarded as a waste site by the West London Waste Plan. The review of the West London Waste Pan has commenced. At this stage it would not be appropriate to prejudice the preparation of the new Plan.</p> |

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| | | | | | <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>7.3 Review of the West London Waste Plan</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.</p> <p>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." (emphasis added)</i></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. This list can be revised. 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." (emphasis added)</i></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</p> | | |
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| | | | | | | 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. | | |
| 330 | Nikki Nicholson, Surrey County Council | Policy 7 Waste and the Circular Economy (Strategic Policy) | | | | <p>Minerals and Waste Planning</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”.</p> <p>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> | <p>Comment noted. The waste hierarchy is mentioned in the supporting text for Policy 7 with regards to Circular Economy Statements, requiring applicants to detail how and where the waste will be managed in accordance with the waste hierarchy. Further references are not deemed necessary as references are made in Policies SI 7, 8 & 9 of the London Plan and within the Strategic Objectives, Vision and in multiple policies of the West London Waste Plan. Both the London Plan and the West London Waste Plan form part of the Development Plan in the Borough.</p> <p>Comment noted. Policy 53 details when a Construction Management Plan will be required: for all major developments, any basement and subterranean developments, developments of sites in confined location or near sensitive receptors or if substantial demolition/excavation works are proposed. Therefore, explicit reference to the National Planning Policy for Waste is not deemed necessary.</p> |
| 331 | Rachel Holmes, Environment Agency | Policy 7 Waste and the Circular Economy (Strategic Policy) | | | | 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. | | A Construction Environment Management Plan is listed as a requirement in Policy 7 A.4. |
| - | | | | | | Policy 8. Flood Risk and Sustainable Drainage (Strategic Policy) | | |
| 332 | Alan Smith | Policy 8, Paragraph numbers 16.52 - 16.86, Sustainability Appraisal: page 29, Table 1.3 item5 | N | 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 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. Study of the site specific locations particularly those in the main High Street Zone are all in key areas at risk.</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 E A / 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 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 & EA documents.</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> | <p>The Council continues to be committed to joint working between neighbouring authorities as part of existing joint working arrangements e.g. as part of the Thames Regional Flood and Coastal Committee and the London Drainage Engineers Group (LoDEG).</p> <p>The Council is also part of the working group for the River Thames Scheme, cooperating on flood risk management strategy.</p> <p>The Lead Local Flood Authority have produced a Local flood Risk Management Strategy that considers other sources of flooding across the Borough.</p> <p>The Council continues to consult the Environment Agency, Thames Water, Greater London Authority and neighbouring boroughs to ensure that cross boundary flooding issues are considered. The Council has produced a Statement of Common Ground with the Environment Agency that refers to flood risk.</p> |

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| | | | | | | <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 businesss 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. 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 stratgeies 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. It is likely, indeed , that the policies and strageties 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 isseues 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> | | Some of these matters go beyond the remit of the Local Plan, but the Council considers the Plan provides an appropriate policy framework to assess flood risk. |
| 333 | David Wilson, Thames Water | Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy) | Y | Y | Y | <p>Policy 8 - Flood Risk & Sustainable Drainage Comments</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 seer flooding in Policy 58.</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</p> | | Support noted. There are multiple references to sewer flooding within the Plan – in particular, within the supporting text for Policy 8 at paragraph 16.87. The Plan ensures that new development is protected from sewer flooding, particularly, part B point 6 of Policy 54 on Basements and Subterranean Development on pumps and supporting |

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| | | | | | | <p>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>Policy 8 Part K – Basements in areas of Flood Risk</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> | | text at paragraph 16.67 of Policy 8 on codes of practice. |
| 334 | Nikki Nicholson, Surrey County Council | Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy) | | | | <p>Flooding</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, River Thames Scheme 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> | <p>Comments noted. Policy 8's length reflects the complexity of the issues covered.</p> <p>An Additional Modification could be considered to add further references to the River Thames Scheme, as a new paragraph 16.84.</p> <p>See the Statement of Common Ground with Surrey County Council.</p> |
| 335 | Zoe Chick, River Thames Scheme | 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>Recommended action: 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. 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> | <p>An Additional Modification could be considered to add n further references to the River Thames Scheme. Additional wording has been suggested as a modification, as a new paragraph 16.84.</p> |
| 336 | Smruti Patel (Avison Young), Avanton Richmond | Policy 8 Flood Risk and Sustainable Drainage | | 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.</p> <p>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</p> | | <p>The reference to the sequential approach was added following comments received by the Environment Agency to the Regulation 18 consultation (see comment 715 on the Regulation 18 Plan). The</p> |

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| | Developments LTD | (Strategic Policy) | | | | <p>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> | | <p>Council considers Policy 8 accords with paragraph 167 of the NPPF.</p> <p>The Flood Risk and Development Sequential Test reports (December 2021 and April 2023) were available as supporting documents to the Regulation 18 and Regulation 19 consultations.</p> |
| 337 | Rachel Holmes, Environment Agency | Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy) | | | | <p>Policy 8 – Flood Risk and Sustainable Drainage (Strategic Policy)’ Part A 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. Part B 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: <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> 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. Part C 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. Part D 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</p> | | <p>Support noted.</p> <p>An Additional Modification could be considered to remove the term ‘minimise’. See the Statement of Common Ground with the Environment Agency.</p> <p>Additional Modifications relating to Part B, D and E of Policy 8 could be considered, see the Statement of Common Ground with the Environment Agency and in discussion with the LLFA.</p> <p>The Council note the updated Thames Estuary 2100 Plan. An Additional Modification could be considered to update Part J accordingly, to future-proof the Plan such as with reference to the latest version.</p> <p>The Council continues to commit to Joint Working but do not consider a reference to this is needed within the Local Plan.</p> <p>An Additional Modification could be considered to add to paragraph 16.80 reference to the Riverside Strategy Approach set out in the Thames Estuary 2100 Plan. See the Statement of Common Ground with the Environment Agency.</p> <p>An Additional Modification could be considered to amend Part L to remove ‘central’ and add ‘appropriate’. See the Statement of Common Ground with the Environment Agency.</p> |

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| | | | | | <p>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.</p> <p>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: “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”.</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>Part E</p> <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.</p> <p>Please clarify the intent of Part E of Policy 8 – ‘Flood Risk and Sustainable Drainage’ (Strategic Policy)</p> <p>Part I & J – Flood defences</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 & 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</p> | |
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| | | | | | <p>information can be found in the updated plan: Richmond Policy Unit: Thames Estuary 2100 - GOV.UK (www.gov.uk). Within the Thames Estuary 2100 Plan (Outcome 4: What needs to be done across the estuary (outcomes): Thames Estuary 2100 - GOV.UK (www.gov.uk)), the Environment Agency has made the following commitment:</p> <p><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>Riverside Strategy Approach</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>Part K</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 errors have been corrected. We also welcome the addition of information regarding basements and flood defences within the table.</p> <p>Part L – Climate change allowances</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 (Flood risk assessments: climate change allowances - GOV.UK (www.gov.uk)), 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.</p> <p>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 Council's Statement of Consultation (June 2023) 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>Riverbanks</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</p> | <p>Comments relating to outfalls are being considered by the LLFA. An Additional Modification could be considered to reference outfalls, see the Statement of Common Ground with the Environment Agency and in discussion with the LLFA.</p> <p>The Council do not consider specific reference to working with natural processes to reduce the risk of flooding is necessary as it is covered elsewhere in the Plan, including at paragraph 21.4.</p> |

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| | | | | | | <p>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> | | <p>An Additional Modification could be considered relating to the need for green alternatives for porous surfaces. See the Statement of Common Ground with the Environment Agency, and in discussion with the LLFA.</p> <p>Support noted.</p> |
| 339 | Rachel Holmes, Environment Agency | Table 16.4 | | | | <p>Table 16.3 [now 16.4] Flood Zones, Restrictions and Requirements</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> | | Support noted. |
| 340 | Rachel Holmes, Environment Agency | Paragraph 16.80 | | | | <p>Additional comments – multiple benefits and interconnected issues</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> | | Support noted. |
| 341 | Rachel Holmes, Environment Agency | Paragraph 16.83 | | | | <p>Additional comments – Flood Risk Activity Permit requirement</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> | | Support noted. |
| - | Victoria Chase (WSP), The Boathouse Twickenham Ltd | Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy) | N | N | N | Positively Prepared ; Justified; Effective; Consistent with national policy | [See comment 470 in relation to EA requirements for a site riverward of the Thames tidal statutory flood defence line] | - |
| - | | | | | | Policy 9. Water Resources and Infrastructure (Strategic Policy) | | |
| 342 | James Stevens, Home Builders Federation | Policy 9 Water Resources and Infrastructure (Strategic Policy) | | N | | 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:</p> <p>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.</p> <p>Parts E, F and G stipulate more specific requirements.</p> <p>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.</p> <p>It is necessary to examine whether the evidence supports the requirements of this policy.</p> <hr/> <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</p> | <p>The Council's response to the respondent's comments on the Regulation 18 Plan (comment 736), set out amendments were made to paragraph 16.97 clarifying that developers need to provide information that shows there is adequate supply and capacity (this is to reflect that it's not the applicant's responsibility to ensure this). The Council feel these are sufficient and no further amendments are necessary.</p> <p>Comments received from Thames Water (see comment 343) promote co-operation and the maintenance of a good working relationship with planning authorities with regards to the provision of water supply and sewerage/waste water treatment infrastructure. The Council's desire and vision for Policy 9 is to promote a joined up approach on this matter.</p> |

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| | | | | | <p>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.</p> <p>The Government guidance can be read here: https://www.gov.uk/government/publications/water-resources-planningguideline/water-resources-planning-guideline</p> <p>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"> • supply-side options to increase the amount of water available to the water company • demand-side options which reduce the amount of water customers require <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></p> <p>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.</p> <p>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: https://www.thameswater.co.uk/media-library/home/about-us/regulation/waterresources/technical-report/executive-summary.pdf</p> <p>The WRMP 2019 identifies tensions but has planned various measures to ensure an adequate supply of water. See pages 17-19 of the Executive Summary for the discussion about how Thames Water has considered future housing growth.</p> <p>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> <hr/> <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—</p> <ol style="list-style-type: none"> (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. <p>(2) The duty of a water undertaker under this section shall be enforceable under section 18 above—</p> <ol style="list-style-type: none"> (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>(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.</p> <p>The same comments apply in relation to Water Companies being statutory consultees to the local plan process.</p> <p>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.</p> <p>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.</p> <p>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> <ol style="list-style-type: none"> 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 | | |
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| | | | | | <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> <hr/> <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 <i>Harris v The Environment Agency</i> [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.</p> <p>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.</p> <p>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.</p> <p>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> | | |
| 343 | David Wilson, Thames Water | 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</p> | <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).</p> | <p>Welcome support. An Additional Modification could be considered to move sub section title: ‘Water quality’ beneath part B of Policy 9.</p> |

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| | | | | | <p>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 & Water Treatment Works upgrades can take 3-5 years.</p> <p>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"> • The developments demand for water supply infrastructure; • The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and • The surface water drainage requirements and flood risk of the development both on and off site and can it be met. <p>We therefore support paragraph 16.98 in this respect.</p> | |
| 344 | Rachel Holmes, Environment Agency | Policy 9 Water Resources and Infrastructure | | | <p>Policy 9 – Water Resources and Infrastructure (Strategic Policy)</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> | An Additional Modification could be considered with regards to WFD waterbodies achieving good/potential, see the Statement of Common Ground with the Environment Agency. |

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| | | re (Strategic Policy) | | | | <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.</p> <p>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>3. Water resources and quality</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> | | <p>Support noted. The Council want to keep the requirement proportionate. The Council considers the policy enables an assessment of the impacts of contamination of surface or ground water and will be an effective tool in the Development Management process.</p> <p>Support noted.</p> |
| - | | | | | | Delivering new homes and an affordable borough for all | | |
| 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.</p> <p>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. 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> | | <p>The Housing Delivery Background Topic Paper provides detail on the Housing Target for the whole plan period and sets out how this will be met within the borough. The Council has a high level of housing need and is a highly constrained borough with a limited supply of sites, which means meeting the London Plan target will be challenging, further detail on this is provided within the Housing Delivery Background Topic Paper. Richmond will continue to work collaboratively with adjacent authorities and accept housing will continue to be a strategic, cross-boundary issue where there will need to be continued liaison. See the Statement of Common Ground with Spelthorne Borough Council.</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> | | <p>Note support for the calculation of the indicative target beyond 2029 as in accordance with the London Plan.</p> <p>The Housing Delivery Background Topic Paper provides detail on the Housing Target for the whole plan period and sets out how this will be met within the borough.</p> <p>The Affordable Housing Background Topic Paper sets out in more detail how the borough plans to meet the housing needs of the community, including housing for older people with the constrained nature of the borough in mind.</p> |

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| 347 | Suzanne Parkes, Elmbridge Borough Council | Meeting demand from outside of the Borough | | | | | | | | <p>Meeting demand from outside of the Borough</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.</p> <p>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> | The Housing Delivery Background Topic Paper provides detail on the Housing Target for the whole plan period and sets out how this will be met within the borough. The Council has a high level of housing need and is a highly constrained borough with a limited supply of sites, which means meeting the London Plan housing target will be challenging, further detail on this is provided within the Housing Delivery Background Topic Paper. Richmond will continue to work collaboratively with adjacent authorities and accept housing will continue to be a strategic, cross-boundary issue where there will need to be continued liaison. See the Statement of Common Ground with Elmbridge Borough Council. | |
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| - | Jonathan Blathwayt, GLA on behalf of Mayor of London | Policy 10 New Housing (Strategic Policy) | | | | | | | | [See comment 346 in relation to the housing target] | See response to comment 346. | |
| 348 | Duncan McKane, London Borough of Hounslow | Policy 10 New Housing (Strategic Policy) | | | | | | | | <p>Housing Policies</p> <p>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.</p> <p>[See also comment 375 on Gypsies and Travellers research]</p> <p>LBH will look to agree positions with LBRUT on meeting housing need through a Statement of Common Ground (SoCG) in coming months.</p> | Additional information on housing delivery and meeting the housing need is within the Affordable Housing and Housing Delivery Background Topic Papers which should provide more clarity on how Richmond proposes to meet the housing need. See the Statement of Common Ground with the London Borough of Hounslow. | |
| 349 | Tim Catchpole, Mortlake with East Sheen Society | Delivering new homes and an affordable borough for all | | | | | | | | <p>Theme: Delivering new homes and an affordable borough for all (Policies 10-16)</p> <p>[See the Council's Statement of Consultation (June 2023) 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]</p> <p>No comments on your responses.</p> | Noted. | |
| 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) | N | N | | | | | | Positively Prepared ; Justified; Effective; Consistent with national policy | <p>Affordable Homes</p> <p>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 draft Policy 10 in a range of broad areas. Within 'Teddington and the Hamptons', a range of 900 – 1,000 new homes have been stated.</p> <p>Notwithstanding paragraph 17.6 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.</p> <p>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.</p> <p>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".</p> | <p>Additional information on housing delivery and meeting the housing need is within the Affordable Housing and Housing Delivery Background Topic Papers which should provide more clarity on how Richmond proposes to meet the housing need.</p> <p>The Council are also proposing to work closely with developers and continuing to work closely with Registered Providers to help promote housing delivery and maximise affordable housing delivery within Richmond as evidenced by the engagement provided within the Housing Delivery Background Topic Paper.</p> <p>See also responses to comment 74 and 401 regarding the protection of industrial land.</p> |

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| | | | | | | <p>London plan Policy H1 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. Policy H1 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 Policies E4, E6 and E7. The potential of co-location of uses through Policy E7 has been explored above. [See comment 401 on employment]</p> <p>Publication Local Plan Paragraph 17.13 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”.</p> <p>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. Paragraph 17.16 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.”</p> <p>Paragraph 4.4.5 of the London Plan 2021 confirms that the London SHMA identifies that 65 per cent of London’s need is for affordable housing.</p> <p>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.</p> <p>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. The London Plan Table 4.2 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 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, draft paragraph 17.9 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 draft Policies 23 and 24 should include an allowance for intensification or co-location within LSIS, to provide for a mix of industrial and residential uses, in line with London Plan Policy E7(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. Policy GG2 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, The Royal Parks | 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 Council's Statement of Consultation (June 2023) 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> | | The Council’s response to the Royal Park’s comment on the Regulation 18 Plan (comment 745) set out that the housing numbers are illustrative of broad areas spread across the whole borough and are not all in close proximity to the Parks, which remains the case. |
| 352 | Philip Villars, PMV Planning Limited on behalf of owner of Arlington Works | Policy 10 New Housing (Strategic Policy) | | N o | | <p>Policy 10 New Housing (Strategic Policy)</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> | | Additional information on housing delivery and meeting the housing need is within the Affordable Housing and Housing Delivery Background Topic Papers which should provide more clarity on how Richmond proposes to meet the housing target. The Council is heavily constrained in terms of the amount land protected through |

| | | | | | | <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 minimum 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.</p> <p>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> | | <p>associated designations; therefore a key consideration is the limited number of available sites within the borough which can support development and this is reflected within the London Plan target which has taken into account land availability within each London Borough.</p> <p>The Council are however, proposing to work closely with developers and continuing to work closely with Registered Providers to help promote housing delivery as evidenced by the engagement provided within the Housing Delivery Background Topic Paper.</p> | | | | | | | | | | |
|--------------------|---|--|--------------------|--|--|---|---------|---|---------|---------|---------|--------------------|--------------------|-------------------|--------------------|-------------------|--|---|
| 353 | Suzanne Parkes, Elmbridge Borough Council | Policy 10 New Housing (Strategic Policy) | | | | <p>Policy 10 – New Housing (Strategic Policy)</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> | | <p>Additional information on housing delivery is within the Housing Delivery Background Topic Paper, which should provide more clarity on how Richmond proposes to meet the housing target. However, in relation to providing figures for site allocations the Council has provided some general assumptions within the Housing Delivery Background Paper, however, the Site Allocations are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity. This needs to be determined through detailed assessment of proposals specific to the site. See the Statement of Common Ground with Elmbridge Borough Council.</p> | | | | | | | | | | |
| 354 | James Stevens, Home Builders Federation | Policy 10 New Housing (Strategic Policy) | No | 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> <p>Table 4.8 – SHLAA phasing periods</p> <table border="1"> <thead> <tr> <th>Phase 1</th> <th>Phase 2</th> <th>Phase 3</th> <th>Phase 4</th> <th>Phase 5</th> </tr> </thead> <tbody> <tr> <td>2017/18 to 2018/19</td> <td>2019/20 to 2023/24</td> <td>2024/5 to 2028/29</td> <td>2029/30 to 2033/34</td> <td>2034/5 to 2040/41</td> </tr> </tbody> </table> <p>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:</p> <p>Phase 4 - 701 Phase 5 – 164</p> <p>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</p> | 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 | | <p>Additional information on housing delivery is within the Housing Delivery Background Topic Paper, which provides more clarity on how Richmond proposes to meet the housing target over the plan period, including the 15-year period.</p> <p>An Additional Modification could be considered to add the latest housing trajectory to the Plan after paragraph 17.4.</p> <p>Although the borough has higher house prices than many other London boroughs, much of the land in the borough is heavily constrained, large parts of the borough are protected through various associated designations including open land such as Metropolitan Open Land, Conservations Areas etc; therefore a key consideration is the limited number of available sites within the borough which can support development and this is reflected within the London Plan target which has taken into account land availability within each London Borough.</p> |
| 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 | | | | | | | | | | | | | | |

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|-----|--|--|---|---|---|--|--|--|---|
| | | | | | | <p>target of 234dpa. This may be a temporary option in any case until a new edition of the London Plan is published.</p> <p>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.</p> <p>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.</p> <p><u>What is the annual average housing requirement over the plan period?</u></p> <p>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.</p> <p><u>Housing trajectory</u></p> <p>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.</p> <p><u>Stepped delivery</u></p> <p><u>The stepped trajectory is unsound because it is unjustified and contrary to the London Plan</u></p> <p>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.</p> <p>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.</p> | | | |
| 355 | Summer Wong (RPS), Notting Hill Genesis | Policy 10 New Housing (Strategic Policy) (p.213-214) | N | N | N | Positively Prepared ; Justified; Effective; Consistent with national policy | <p>Policy 10 New Housing (Strategic Policy) (p.213-214)</p> <p>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 Paragraph 17.9 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.</p> <p>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.</p> <p>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.</p> | <p>Recommended Amendment</p> <p>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.</p> | The Housing Delivery Background Topic Paper provides additional information on the anticipated delivery on some of the more certain sites. See response to comment 353. |
| 356 | Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common | Policy 10 New Housing (Strategic Policy) | | | | <p>b. Reasons for the proposed amendment - 1</p> <p>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).</p> <p>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 tracked more easily, providing improved transparency. Currently this data is often difficult to find, particularly in the large developments, and is not always reported in the same a way, which makes collating totals difficult. Including this change would be consistent with National Policy.</p> <p>[See c. Relevant Policies and other evidence on housing in comment 379 on Policy 13]</p> | <p>2. Section 17 - Delivering new homes and an affordable borough for all.</p> <p>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.</p> <p>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 Brewery site to negotiate the STAG site FVA with Richmond council. It is yet to be determined that full assurance can be given that the conflict has been managed correctly. An update is expected shortly.</p> <p>a. Local Plan proposed amendment - 1</p> <p>‘Local Plan Policy 10 New Housing (Strategic Policy)</p> <p>Table</p> <p>Area Barnes & East Sheen, Description should read ‘Mortlake’ as this is the development area. An estimate of 800-900 houses is significantly less than</p> | There is additional information provided within the Housing Delivery and Transport Background Topic Papers which should provide clarity on the points raised. In relation to transparency, the Council publishes a Housing Authority Monitoring Report each year which monitors housing delivery and affordable housing delivery, including delivery within different tenures and types of properties delivered. The Council provides this as not only a report but also as an excel spreadsheet so the background data can be analysed more closely by individuals to improve the Council’s transparency. | |

| | | | | | | <p>forecast, with at least 1,200 homes with planning permission achieved or in the assessment stage, from site allocations 34 – STAG Brewery and 37 – Barnes Hospital. This doesn't include development yields from sites 35 – Mortlake Delivery Office & Site 36 – East Sheen Telephone Exchange.</p> <p>Area Richmond, Description should read 'Richmond & Kew' as this is the development area. An estimate of 1,100-1,200 is significantly less than forecast, with at least 1,800 homes from planning permission or in the pipeline including Kew Retail Park – 1,200 and Homebase – 453 homes.</p> <p>Include new text:</p> <p><i>C. A summary setting out the net contribution to housing split in the format below will be available at the top of each officer's planning application report and a total figure will be provided once a year to full council in July, at the last meeting before summer recess, with a comment setting out progress against targets within each category.</i></p> <table border="1"> <thead> <tr> <th></th> <th>Studio 1P</th> <th>1B1-2P</th> <th>2B3P</th> <th>2B4P</th> <th>3B5P</th> <th>3B6P</th> <th>4B8P</th> </tr> </thead> <tbody> <tr> <td>Market sale</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Shared Ownership</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Min. £50,000 income</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Min. £70,000 income</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Min. £90,000 income</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>London Affordable rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Social rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td>SSH</td> <td>IL</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Market sale</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Shared Ownership</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Min. £50,000 income</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Min. £70,000 income</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Min. £90,000 income</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>London Affordable rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Social rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>Note: SSH = supported or specialist housing, IL = independent Living</p> <table border="1"> <thead> <tr> <th>Churn - optimum accommodation</th> <th>2B3P</th> <th>2B4P</th> <th>3B5P</th> <th>3B6P</th> <th>4B8P</th> </tr> </thead> <tbody> <tr> <td>Number of under-occupied properties released</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>London Affordable rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Social rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Number of over-crowded families rehoused</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>London Affordable rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Social rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | | Studio 1P | 1B1-2P | 2B3P | 2B4P | 3B5P | 3B6P | 4B8P | Market sale | | | | | | | | Shared Ownership | | | | | | | | Min. £50,000 income | | | | | | | | Min. £70,000 income | | | | | | | | Min. £90,000 income | | | | | | | | Rent | | | | | | | | London Affordable rent | | | | | | | | Social rent | | | | | | | | | SSH | IL | | | | | | Market sale | | | | | | | | Shared Ownership | | | | | | | | Min. £50,000 income | | | | | | | | Min. £70,000 income | | | | | | | | Min. £90,000 income | | | | | | | | Rent | | | | | | | | London Affordable rent | | | | | | | | Social rent | | | | | | | | Churn - optimum accommodation | 2B3P | 2B4P | 3B5P | 3B6P | 4B8P | Number of under-occupied properties released | | | | | | London Affordable rent | | | | | | Social rent | | | | | | Number of over-crowded families rehoused | | | | | | London Affordable rent | | | | | | Social rent | | | | | | |
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| | Studio 1P | 1B1-2P | 2B3P | 2B4P | 3B5P | 3B6P | 4B8P | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Shared Ownership | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Min. £90,000 income | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| London Affordable rent | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 357 | Smruti Patel (Avison Young), Avanton Richmond Developments LTD | Policy 10 New Housing (Strategic Policy) | No | Consistent with national policy | <p>In accordance with paragraph 22 of the NPPF, in order to meet the test of soundness, it is necessary for strategic policies to cover the full plan period. Paragraph 2.1 of the draft local plan confirms the plan period as 15 years. Policy 10, as confirmed in its heading, is a strategic policy, however, part 2 only covers a 10-year period. As such, we would recommend the policy is amended to cover the full plan period of 15 years for consistency with national policy.</p> <p>Additionally, to meet the 15-year housing requirement over the plan period, the 10-year net completions target set by policy H1 of the London Plan should be projected forward. Policy 10 should therefore be amended to plan for a housing target of c. 6,170 homes in order to be consistent with national policy and in general conformity with the London Plan.</p> <p>Part B of Policy 10 identifies 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 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 paragraph 16(d) of the NPPF. In order to be effective, the 'areas' referred to in Policy 10 should be amended to reflect the 'places' set out in Chapters 6-14 of the plan, upon which the spatial strategy of the plan as a whole is based.</p> <p>Part B also sets out a quantum of housing for each broad location. These are described as 'indicative ranges' and 'approximate' figures – terms which are vague and do not firmly commit to delivering the minimum target set by policy H1 of the London Plan. To ensure accordance with national policy (specifically paragraph 16(d) of the NPPF) and conformity with the London Plan, the figures should be reflected as targets with a clear intention to exceed.</p> <p>In order to accord with national policy (paragraph 68 of the NPPF), the 'target' amounts of new housing for each broad location set out in the table at Part B should be amended to 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</p> | <p>forecast, with at least 1,200 homes with planning permission achieved or in the assessment stage, from site allocations 34 – STAG Brewery and 37 – Barnes Hospital. This doesn't include development yields from sites 35 – Mortlake Delivery Office & Site 36 – East Sheen Telephone Exchange.</p> <p>Area Richmond, Description should read 'Richmond & Kew' as this is the development area. An estimate of 1,100-1,200 is significantly less than forecast, with at least 1,800 homes from planning permission or in the pipeline including Kew Retail Park – 1,200 and Homebase – 453 homes.</p> <p>Include new text:</p> <p><i>C. A summary setting out the net contribution to housing split in the format below will be available at the top of each officer's planning application report and a total figure will be provided once a year to full council in July, at the last meeting before summer recess, with a comment setting out progress against targets within each category.</i></p> <table border="1"> <thead> <tr> <th></th> <th>Studio 1P</th> <th>1B1-2P</th> <th>2B3P</th> <th>2B4P</th> <th>3B5P</th> <th>3B6P</th> <th>4B8P</th> </tr> </thead> <tbody> <tr> <td>Market sale</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Shared Ownership</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Min. £50,000 income</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Min. £70,000 income</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Min. £90,000 income</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>London Affordable rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Social rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td>SSH</td> <td>IL</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Market sale</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Shared Ownership</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Min. £50,000 income</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Min. £70,000 income</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Min. £90,000 income</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>London Affordable rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Social rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>Note: SSH = supported or specialist housing, IL = independent Living</p> <table border="1"> <thead> <tr> <th>Churn - optimum accommodation</th> <th>2B3P</th> <th>2B4P</th> <th>3B5P</th> <th>3B6P</th> <th>4B8P</th> </tr> </thead> <tbody> <tr> <td>Number of under-occupied properties released</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>London Affordable rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Social rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Number of over-crowded families rehoused</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>London Affordable rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Social rent</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | | Studio 1P | 1B1-2P | 2B3P | 2B4P | 3B5P | 3B6P | 4B8P | Market sale | | | | | | | | Shared Ownership | | | | | | | | Min. £50,000 income | | | | | | | | Min. £70,000 income | | | | | | | | Min. £90,000 income | | | | | | | | Rent | | | | | | | | London Affordable rent | | | | | | | | Social rent | | | | | | | | | SSH | IL | | | | | | Market sale | | | | | | | | Shared Ownership | | | | | | | | Min. £50,000 income | | | | | | | | Min. £70,000 income | | | | | | | | Min. £90,000 income | | | | | | | | Rent | | | | | | | | London Affordable rent | | | | | | | | Social rent | | | | | | | | Churn - optimum accommodation | 2B3P | 2B4P | 3B5P | 3B6P | 4B8P | Number of under-occupied properties released | | | | | | London Affordable rent | | | | | | Social rent | | | | | | Number of over-crowded families rehoused | | | | | | London Affordable rent | | | | | | Social rent | | | | | | <p>Additional information on housing delivery is within the Housing Delivery Background Topic Paper, which provides more clarity on how Richmond proposes to meet the housing target over the plan period, including the 15-year period.</p> <p>An Additional Modification could be considered to add the latest housing trajectory to the Plan after paragraph 17.4.</p> |
| | Studio 1P | 1B1-2P | 2B3P | 2B4P | 3B5P | 3B6P | 4B8P | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Min. £70,000 income | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Min. £90,000 income | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Churn - optimum accommodation | 2B3P | 2B4P | 3B5P | 3B6P | 4B8P | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Number of under-occupied properties released | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Number of over-crowded families rehoused | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| London Affordable rent | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| | | | | | | 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) | N o | 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 Council's Statement of Consultation (June 2023) 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] | | The Council's response to the respondent's comment on the Regulation 18 Plan (comment 752) was that the Plan should be read as whole and the housing target does not outweigh other policy requirements, and provided clarification on the approach to housing land supply and Site Allocations. Additional information is within the Housing Delivery Background Topic Paper, which provides more clarity on how Richmond proposes to meet the housing target over the plan period. |
| - | Victoria Chase (WSP), The Boathouse Twickenham Ltd | | N o | 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] | | In relation to the points made regarding housing delivery over the whole plan period, additional information on housing delivery is within the Housing Delivery Background Topic Paper, which provides more clarity on how Richmond proposes to meet the housing target over the plan period. |
| 359 | Tim Humphries (Firstplan), William Grant & Sons Ltd | Policy 10 New Housing (Strategic Policy) | N o | N o | N o | Positively Prepared ; Justified; Consistent with national policy | [See also comment 410 on Policy 23] 4.11 Draft Policy 10 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: "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." (our underlining) | | Additional information on housing delivery is within the Housing Delivery Background Topic Paper, which provides more clarity on how Richmond proposes to meet the housing target over the plan period. |
| - | | | | | | | Policy 11 Affordable Housing (Strategic Policy) | | |
| 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 | | The Council's response to the HBF's comment on the Regulation 18 Plan on small sites (comment 770) outlined the importance of contributions in the borough context and how the policy is implemented. The Council's response to the GLA's comment on the Regulation 18 Plan on the threshold approach (comment 762) emphasised the importance of delivering the right type of affordable housing to meet local priority needs. The Council has provided justification and evidence behind the policy requirements within the Housing Delivery and Affordable Housing Background Topic Papers which also provide further clarity on the reason for requiring 50% affordable housing and the viability of delivering 50% affordable housing within the borough in relation to common site types. |

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| | | | | | | <p>completions. This is supported by the evidence in the trajectory showing completions falling below the London Plan requirement since 2018/19.</p> <p>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.</p> <p>We recommend that the Council revises the plan to support the threshold approach described in London Plan policy H4.</p> | | |
| 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> | | Additional information on affordable housing delivery is within the Affordable Housing Background Topic Paper, which provides more clarity on how Richmond proposes to deliver affordable housing along with justification for the policy position. In relation to viability including embodied carbon and carbon offsetting requirements, as the Council declared a climate emergency in 2019 the provision of higher standard homes and moving towards a more sustainable borough are shared priorities for the Council. |
| 362 | Natasha Styles (The Planning Bureau Limited), McCarthy & Stone Retirement Lifestyles Ltd | Policy 11 Affordable Housing (Strategic Policy) | No | 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>Policy 11: Affordable housing Policy 11, point A and B</p> <p>We note that Policy 11: Affordable Housing, Point A, states that ‘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’. 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 ‘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’. 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 Council's Statement of Consultation (June 2023) 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 ‘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”.</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 “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.”(Paragraph: 002 Reference ID: 10-002-20190509).</p> | <p>Recommendation: Delete Policy 11. G as follows: 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</p> <p>Recommendation: 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: 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.</p> <p>Recommendation: Delete the following text from para 17.19: 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.</p> | <p>Additional information is within the Affordable Housing Background Topic Paper which provides justification into the Council’s approach on how we plan to accommodate the needs of elderly people within the borough, reducing the need for a large number of specific sheltered housing developments. Section 5 in the Paper references the Council’s evidence base in the Housing LIN analysis (2021). This approach is due to having limited sites available for development (more information provided within the Housing Delivery Background Topic Paper) and with the very high need for general needs affordable housing, as shown within the Local Housing Needs Assessment which is part of the evidence base for the Local Plan, the borough needs to focus on the priority housing needs of the borough.</p> <p>In relation to providing specific viability evidence for sheltered housing, within RICS guidance “Assessing viability in planning under the National Planning Policy Framework 2019 for England” (updated 2021); it states the following: “3.3.6 Development typologies should be representative of the development that is planned and reflect the characteristics of groups of sites identified in the proposed land supply.”</p> <p>As sheltered housing will not form a large part of development coming forwards within the Local Plan period, it is not considered appropriate to include this as a separate typology. The Council therefore prioritised more common site typologies</p> | |

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| | | | | | <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 (retirementhousinggroup.com), 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>Policy 11 point G and Para 17.28 – Review Mechanisms 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. 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. Paragraph: 009 Reference ID: 10-009-20190509 of the government guidance on Viability states the following: '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.</p> <p>With respect to planning obligations or s106, Para 57 of NPPF states 'Planning obligations must only be sought where they meet all of the following tests ²⁶ :</p> <p>(a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development'</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. 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. 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>Para 17.22 – threshold approach 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 'Richmond's affordable housing need is so great and the Borough has such a limited supply of major sites, using the threshold approach would</p> | | <p>within the Whole Plan Viability Assessment.</p> <p>In relation to review mechanisms, this is a tool to ensure if there are changes within the economy, which can happen in a short period of time, that additional funds are secured towards affordable housing. As included within the Affordable Housing Background Paper there is a very high need for general needs affordable housing and therefore, the Council needs to take an active approach to maximise delivery. It is important to note that the policy requirement on employment sites includes a minimum of 50% affordable housing, therefore, in this case even if 50% was offered it would only be the minimum requirement.</p> <p>In relation to the threshold approach, the Affordable Housing and Housing Delivery Background Topic Papers provide further clarity onto the reasoning for the Council not wishing to apply the threshold approach within the borough.</p> <p>In relation to the vacant building credit the reasoning behind not applying this is included within the Local Plan is still relevant in Richmond.</p> |
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| | | | | | <p>have a detrimental impact on the Council achieving its goal of providing 50% affordable housing across the Borough.'</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 in fact increased not decreased.</p> <p>Para 17.19 - Vacant Building Credit</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 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.</p> <p>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.</p> | | | |
| 363 | Neil Henderson (Gerald Eve), Reselton Properties | Policy 11 Affordable Housing (Strategic Policy) | | No | Positively Prepared ; Justified; Effective; Consistent with national policy | <p>We wish to reiterate our comments made in Response to the Regulation 18 Consultation process, dated 31 January 2023.</p> <p>[See the Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 763 in relation to Policy 11]</p> | <p>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.</p> | <p>The Council's response to the respondent's comment on the Regulation 18 Plan (comment 763) emphasised the importance of delivering the right type of affordable housing to meet local priority needs. As included within the Local Housing Needs Assessment, including the 2023 update, that is part of the evidence base for the Local Plan, there is a very high level of need for social rented housing (1,123 social rented dwellings per annum and 284 intermediate products), therefore, proportionately there is a small need for intermediate homes within the borough, so providing a tenure mix weighted further towards intermediate products, would not provide the housing most in need within the borough which would be counterproductive for an affordable housing policy. The Council have viability tested the proposed tenure mix and it is viable across a number of different typologies and site types, therefore it is justified to continue with the policy approach.</p> |
| 364 | Councillor Niki Crookdake , Green Party Councillor for Mortlake & Barnes Common | Policy 11 Affordable Housing (Strategic Policy) | | | | <p>b. Reasons for the proposed amendment - 2</p> <p>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.</p> <p>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.</p> | <p>a. Local Plan proposed amendment – 2</p> <p>Policy 11. Affordable Housing (Strategic Policy)</p> <p>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... with priority for 3 and 4 bed social rented family homes and supported living developments.</p> <p>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</p> | <p>The Council will continue to rigorously assess viability assessments to ensure the correct inputs are applied. However, this must be done within the bounds of the NPPF, national Planning Practice Guidance, and relevant guidance.</p> <p>The use of blended profit as an output within viability appraisals is useful,</p> |

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| | | | | | | [See c. Relevant Policies and other evidence on housing in comment 379 on Policy 13] | 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. <i>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.</i> | however a residual land value output is also required to assess the associated level of deficit or surplus within the scheme which is difficult to directly determine when applying just a blended profit scenario. The London Plan Guidance on Development Viability (consultation draft May 2023) should help with some of the points raised and this is anticipated to be adopted in early 2024. In relation to the mix required, the application of the affordable housing policy by habitable room in Policy 11 will support the requirement for larger properties within the affordable housing mix. See also response to comment 379. |
| 365 | Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer | Affordable Housing & Whole Plan Viability – Policy 11 | No | No | No | Positively Prepared ; Justified; Effective; Consistent with national policy | <p>Context – Regulation 18 Representations</p> <p>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.</p> <p>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).</p> <p>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]</p> <p>Regulation 19</p> <p>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 not in general conformity with the London Plan and raises procedural issues.</p> <p>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.</p> <p>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.</p> <p>Accordingly, the policy is not positively prepared nor likely to be effective. It is, furthermore, not justified by the evidence (the Local Plan Viability Assessment). As a consequence it is incapable of delivering sustainable development and is therefore not consistent with national policy.</p> <p>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.</p> <div data-bbox="706 1415 1590 1713" style="border: 1px solid black; padding: 5px;"> <p>Definitions for Affordable Housing</p> <p>Genuinely Affordable Housing- The Council considers the following to be genuinely affordable housing products:</p> <ul style="list-style-type: none"> • 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). </div> | <p>Additional information is within the Affordable Housing and Housing Delivery Background Topic Papers relating to affordable housing delivery, the application of the 50% affordable housing target in place of the threshold approach, as well as evidence on previous delivery plus planned delivery of overall housing and affordable housing. These background papers should clarify these points further.</p> <p>In relation to viability the Council maintains that individual sites will be viability assessed if the policy requirement is unviable. In relation to the Stag Brewery, the site is highly complex with large scale community benefits including a cinema, retail space and employment space, which all have an impact on viability, and as a result reduced the overall affordable housing percentage, and it is clear in this scheme the community benefits were weighed carefully against the overall affordable housing percentage. This is the appropriate approach as detailed within national Planning Practice Guidance.</p> <p>In relation to the viability inputs, it is well accepted that whole plan viability assessments can only assess viability at a snapshot in time. As part of the examination process it is accepted that whole plan viability assessments normally require some further additional sensitivity testing due to the passing of time between consultation and examination.</p> <p>In relation to providing specific viability evidence for site allocations, within RICS guidance "Assessing viability in planning under the National Planning Policy Framework 2019 for England" (updated 2021); it states the following: "3.3.6 Development typologies should be representative of the development that is planned and reflect the characteristics of</p> |

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| | | | | | <p>Policy 11</p> <p>Affordable Housing (Strategic Policy)</p> <p>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.</p> <p>B. A contribution towards affordable housing will be expected on all housing sites.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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: <i>Table 4.1 Total New Homes Completed in LB Richmond-upon Thames 2012-2022</i></p> | | <p>groups of sites identified in the proposed land supply.”</p> <p>As there are specific policies in the Plan protecting commercial and community uses at ground floor in centres from changes of use to housing, therefore development of existing retail sites is not expected in the Plan and it is not considered appropriate to include this as a separate typology. The Council therefore prioritised more common site typologies within the Whole Plan Viability Assessment for the key four land values within the study.</p> <p>It is also important to note that within each site typology a number of different market values are tested as this accepts the varying nature of the boroughs property values, which can often vary street by street. Given that 9 different values are tested from £7,130 to £9,880 there is a good variation tested alongside the 4 main land values.</p> |
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| 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 |
| Total | 3,207 | 64 | 1,682 | -243 | 11 | 4,721 |

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 |
| Total | 67 | 358 | 26 | 16 | 467 |

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% | 45% |

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 ¼ 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 | 50 | 53% | 83 | 22 | 27% |
| 2019 | 63 | 50 | 79% | 55 | 21 | 38% |
| 2020 | 95 | 73 | 77% | 83 | 43 | 52% |
| 2021 | 88 | 72 | 82% | 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

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

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.

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| | | | | | | <p>Methodology</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"> - 70% London Affordable Rent (LAR) & 30% Shared Ownership (SO); - 70% LAR & 30% London Living Rent (LLR); - 70% Social Rent (SR) & 30% SO; and - 70% SR & 30% LLR. <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>Benchmark Land Value</p> <p>The Viability Assessment tests four benchmark land values including:</p> <ul style="list-style-type: none"> - Existing residential; - Secondary offices; - Secondary industrial sites; and - Garden/amenity/open land/vacant garage sites. <p>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)).</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> | | |
|--|--|--|--|--|--|---|--|--|

| 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 £24.6m per hectare in Richmond upon Thames which is far higher than BNP Paribas' assumption. |
| Secondary offices | £12.39m 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 | £5.28m 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 | £0.5m 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

| | | | | <p>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.</p> <p>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.</p> <p>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.</p> <p>Commercial Rents & Yields</p> <p>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.</p> <p>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.</p> <p>We have noted below a number of concerns with this approach:</p> <ul style="list-style-type: none"> - 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. <p>Build costs</p> <p>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.</p> <p>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.</p> <p>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.</p> <p><i>Table 4.6 Q2 2022 - Q2 2023 Indices</i></p> <table border="1" data-bbox="706 1255 1412 1558"> <thead> <tr> <th>Index</th> <th>Q2 2022 - Q2 2023 (% change)</th> </tr> </thead> <tbody> <tr> <td>House Price Index All Property (Richmond Upon Thames)</td> <td>1.9% (To April, latest data available)</td> </tr> <tr> <td>House Price Index Flats (Richmond Upon Thames)</td> <td>1.3% (To April, latest data available)</td> </tr> <tr> <td>BCIS All in TPI</td> <td>4.9%</td> </tr> <tr> <td>BCIS General Building Cost Index</td> <td>3.0%</td> </tr> <tr> <td>BCIS Private Housing Construction Index</td> <td>6.8%</td> </tr> </tbody> </table> <p>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.</p> <p>Development assumptions</p> <p>We have summarised the remaining Viability Assessment assumptions in the table below with our comments against each.</p> <p><i>Table 4.7 BNP Paribas Viability Assessment Assumptions</i></p> | 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 | 6.8% | | |
|---|--|--|--|---|-------|------------------------------|---|--|--|--|-----------------|------|----------------------------------|------|---|------|--|--|
| 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 | 6.8% | | | | | | | | | | | | | | | | | |

| | | |
|---------|---|---|
| Finance | 6% | 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 - 15% 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 | 5% of build costs for domestic and non-domestic |
| Cost uplift for embodied carbon | 15% of build costs for domestic and non-domestic |
| Accessibility - Flats | M4(2) 1.15% (all dwellings) M4 (3b) 9.47% (10% of dwellings) |
| Accessibility - Houses | M4(2) 0.54% (all dwellings) M4 (3b) 23.80% (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.

| | | | | | | | | |
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| | | | | | | <p>- 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 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> <p>- 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.</p> <p>Assumptions Conclusion</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"> - 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. - No retail benchmark land value assumed. - Allowances for demolition and abnormal costs are excluded. - The finance rate is low when you consider current interest rates. - 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. - The S106 and S278 costs are low when you consider previously agreed costs in the borough. - Commercial letting fees and purchasers' costs are excluded <p>Relationship to Draft Site Allocations</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> | | |
|--|--|--|--|--|--|--|--|--|

| 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, Hanworth | 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 | Kneller 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 Biothane Plant | Former biothane 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);

| | | | | | | | | |
|-----|--|---|--|--|--|---|--|---|
| | | | | | | <p>- The majority of the scenarios tested in the Viability Assessment are unviable with 50% affordable housing;</p> <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.</p> <p>There is furthermore, no justification provided for restricting access to the viability tested route to exceptional circumstances.</p> <p>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.</p> <p>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 units¹). 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></p> <p>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.</p> <p>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></p> <p>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 Components², 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.</p> <p>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.</p> <p>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.</p> <p>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-</p> | | <p>Additional information is within the Affordable Housing and Housing Delivery Background Topic Papers relating to affordable housing delivery, the application of the 50% affordable housing target in place of the threshold approach, as well as evidence on previous delivery plus planned delivery of overall housing and affordable housing.</p> <p>In relation to viability, the whole plan viability found there were many instances where 50% affordable housing was viable within the borough and most viable site types are the more common site types that deliver housing within the borough. More detail on this point is provided within the Housing Delivery and Affordable Housing Background Topic Papers.</p> <p>In relation to the viability inputs, it is well accepted that whole plan viability assessments can only assess viability at a snapshot in time. As part of the examination process it is accepted that whole plan viability assessments normally require some further additional sensitivity testing due to the passing of time between consultation and examination.</p> <p>In relation to testing the Council has followed the correct approach as set out within the national Planning Practice Guidance and RICS guidance "Assessing viability in planning under the National Planning Policy Framework 2019 for England" (updated 2021); which states the following: "3.3.6 Development typologies should be representative of the development that is planned and reflect the characteristics of groups of sites identified in the proposed land supply."</p> |

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| | | | | | | <p>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>¹ https://commonslibrary.parliament.uk/local-authority-data-housing-supply/ ² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1138937/23-cs3-Construction_Building_Materials_-_Commentary_February_2023.pdf</p> | | |
| 367 | Jonathan Blathwayt, GLA on behalf of Mayor of London | Affordable Housing | | No | Consistent with national policy | <p>The Mayor welcomes LBRuT's 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> | | As a result of Regulation 18 comments regarding the threshold approach, additional evidence relating to the Council's position is within the Affordable Housing and Housing Delivery Background Topic Papers. The background papers provide justification into the reasoning behind not seeking to apply the threshold approach within the borough. See the Statement of Common Ground with the GLA on behalf of the Mayor of London. |
| 368 | Summer Wong (RPS), Notting Hill Genesis | Policy 11 Affordable Housing (Strategic Policy) (p.217-218) | No | No | Positively Prepared ; Justified; Effective; Consistent with national policy | <p>Policy 11 Affordable Housing (Strategic Policy) (p.217-218)</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. 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>Recommended Amendment</p> <p>Policy 11 Part A) <i>All new housing developments in the borough should provide at least 50% 35% 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, subject to viability.</i></p> <p>Policy 11 Part B) Point 2) <i>On all other sites capable of ten or more units gross 50% 35% on-site provision, subject to viability.</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, subject to site-specific viability testing.</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> | As a result of Regulation 18 comments regarding the threshold approach, additional evidence relating to the Council's position is within the Affordable Housing and Housing Delivery Background Topic Papers. The background papers provide justification into the reasoning behind not seeking to apply the threshold approach within the borough. |
| 369 | Luke Burroughs, | Policy 11 Affordable | | | | Policy 11: Affordable Housing | | Within Policy 11 this point is covered within part F which states: |

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| | Transport Trading Limited Properties Limited (TTLP) | Housing (Strategic Policy) | | | | | <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. 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> | | <p>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.</p> <p>This will cater for complex sites which would struggle to provide 50% affordable housing.</p> <p>The Council’s response to the respondent’s comment on the Regulation 18 Plan (comment 759) raised concern about the potential for portfolio agreements or public sector landowners to result in affordable housing provision ending up elsewhere in London, which would undermine creating mixed and balanced communities and the Council’s ability to control nominations or monitoring.</p> |
| 370 | Lucy Hale (Gerald Eve), St Mary’s University | Policy 11 Affordable Housing (Strategic Policy), Local Housing Needs Assessment 2021 paragraphs 8.74 and 8.85 | | | | | <p>Local Housing Need Assessment (LHNA) 2021</p> <p>St Mary’s previously commented on the Local Housing Needs Assessment 2021 (LHNA) as part of the Regulation 18 Consultation [See the Council's Statement of Consultation (June 2023) 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 position moving forward in respect of student residential accommodation, however there are two points they wish to highlight below.</p> <ul style="list-style-type: none"> • 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’. • Paragraph 8.85 - with regard to the statement <i>“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...”</i>. 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. | | <p>At present there is no additional evidence to justify there is a higher need for student accommodation within the borough. The Council’s response to the respondent’s comment on the Regulation 18 Plan (comment 780) was that it not considered necessary to amend the LHNA, as the update to the figures suggests on-site capacity to increase by an additional 57 units is broadly in line within the earlier position, and the housing policies provide an appropriate framework to assess any future proposals.</p> |
| 371 | Tim Humphries (Firstplan), William Grant & Sons Ltd | Policy 11 Affordable Housing (Strategic Policy), | N | N | N | Positively Prepared ; Justified; Consistent with national policy | <p>[See also comment 410 on Policy 23]</p> <p>4.12 Draft Policy 11 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.</p> | | <p>The differentiation recognises the Plan seeks to protect employment sites within the borough. There are a small number of high quality employment sites within the borough and by applying a higher affordable housing percentage to employment sites, this seeks to prevent the large scale loss of employment floorspace. This approach aligns with the London Plan which also seeks a higher level of affordable housing in former employment sites even when applying the threshold approach.</p> |
| - | James Sheppard (CBRE), LGC LTD | | | | | | [See comment 350 in relation to Policy 11 and the LGC site] | | See response provided to comment 350. |
| - | Peter Thompson, National Physical | | | | | | [See comment 132 in relation to Policy 11 and NPL] | | Support and comments noted. |

| | Laboratory (NPL) | | | | | | | | | | |
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| - | | | | | | | | | Policy 12 Housing Needs of Different Groups | | |
| 372 | James Stevens, Home Builders Federation | Policy 12: Housing Needs of Different Groups | | No | | | | | <p>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.</p> | Justification into the approach within the Plan in relation to specialist housing for elderly people within the Affordable Housing and Housing Delivery Background Topic Papers. This approach is based on the findings from the Local Housing Needs Assessment stage 1 and 2 which form part of the evidence for the Local Plan. Section 5 in the Affordable Housing Background Topic Paper references the Council's evidence base in the Housing LIN analysis (2021). | |
| - | 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] | See response to comment 346. | |
| 373 | Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common | Policy 12 Housing Needs of Different Groups | | | | | | | <p>b. Reasons for the proposed amendment - 3 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]</p> | <p>a. Local Plan proposed amendment – 3 Policy 12. Housing Needs of Different Groups 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.</p> | Part B already 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. However, Government guidance requires obligations and conditions are only used where relevant tests are met, such as being necessary, relevant to the development and reasonable. The Council's standard conditions and template agreements are kept under review, but it is not appropriate to set out such details in the Local Plan. |
| 374 | Matthew Pigott (Avison Young), Star Land Realty | Policy 12 'Housing Needs of Different Groups' | No | No | No | Justified; Consistent with national policy | | | <p>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. Policy 12 'Housing Needs of Different Groups' 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 decision¹ (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: "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." 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. 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. 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. 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,</p> | <p>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 bold): "All residential uses, excluding care home accommodation as defined within the Local Plan Glossary, 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." Supporting text paragraph 17.45 should also be amended to reflect this (amendments in bold): "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, excluding care home 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." 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>Further justification of the policy approach is within the Affordable Housing and Housing Delivery Background Topic Papers. The papers include evidence relating to the high level of need for affordable housing within the borough and the limited supply of sites which result in the borough needing to apply affordable housing requirements to all forms of housing. Section 5 in the Affordable Housing Background Topic Paper references the Council's evidence base in the Housing LIN analysis (2021).</p> <p>In relation to providing specific viability evidence for specialist older persons housing, within RICS guidance "Assessing viability in planning under the National Planning Policy Framework 2019 for England" (updated 2021); it states the following: "3.3.6 Development typologies should be representative of the development that is planned and reflect the characteristics of groups of sites identified in the proposed land supply."</p> |

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| | | | | | | <p>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><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"> • <i>Personal care and accommodation provided together as a package with no clear separation between the two;</i> • <i>The person using the service cannot choose to receive personal care from another provider;</i> • <i>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;</i> • <i>Likely CQC-regulated activity will be 'accommodation for persons who require nursing or personal care'.</i> | <p>As specialist older persons will not form a large part of development coming forwards within the Local Plan period, it is not considered appropriate to include this as a separate typology. The Council therefore prioritised more common site typologies within the Whole Plan Viability Assessment.</p> |
| 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). [See also comment 348 on housing policies]</p> | | <p>Noted. The Council is engaging with RRR Consultancy who are carrying out the London-wide gypsy and traveller accommodation needs assessment. An Additional Modification could be considered to update paragraph 17.46 this report is now due to be published in 2024.</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 | N | 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). [See Appendix 6, along with the Council's Statement of Consultation (June 2023) 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> | | <p>The Council's response to the respondent's comment on the Regulation 18 Plan (comment 775) was that it is clear the policy applies to any type of specialist housing and that the high standards of accessible and inclusive design sought are clear; this position is still relevant. In addition further justification into the policy approach is within the Affordable Housing and Housing Delivery Background Topic Papers.</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.</p> <p>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>Recommendation: Delete point B.1. 1. 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.</p> <p>Delete Policy 12 point B2: All residential uses should demonstrate how higher standards of accessible and inclusive design have been met.</p> <p>Amend Policy 12 point B. 3. 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. B. 3. 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., 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 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</p> | <p>Further justification of the policy approach is within the Affordable Housing and Housing Delivery Background Topic Papers. The papers include how the Council seeks to provide housing to best meet the needs of the borough, especially when the borough has a limited number of available sites. Section 5 in the Affordable Housing Background Topic Paper references the Council's evidence base in the Housing LIN analysis (2021).</p> <p>In relation to providing specific viability evidence for specialist older persons housing, within RICS guidance "Assessing viability in planning under the National Planning Policy Framework 2019 for England" (updated 2021); it states the following: "3.3.6 Development typologies should be representative of the development that is planned and reflect the characteristics of</p> |

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| | | | | <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"> • ‘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. • 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. • 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.’ <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"> • 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 • 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. • 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. <p><u>Environmental</u> The proposal provides a number of key environmental benefits by:</p> <ul style="list-style-type: none"> • Making more efficient use of land thereby reducing the need to use limited land resources for housing. • 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. • Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources. <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 <i>‘sheltered housing’</i>). <i>The</i></p> | <p>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.</p> <p>Delete para 17.45 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.</p> | <p>groups of sites identified in the proposed land supply.”</p> <p>As specialist older persons will not form a large part of development coming forwards within the Local Plan period, it is not considered appropriate to include this as a separate typology. The Council therefore prioritised more common site typologies within the Whole Plan Viability Assessment.</p> |
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| | | | | | | <p>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'. 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 this would make up almost 20% of total housing need. This is a substantial proportion of housing need. Given 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. 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></p> <p>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></p> <p>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. 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. 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. 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] | | See response to comment 192. |
| - | Victoria Chase (WSP), The Boathouse | Policy 12 Housing Needs of Different Groups | N o | N o | N o | Positively Prepared ; Justified; Effective; | [See comment 470 in relation to the identified housing need and The Boathouse site] | The comment relates specifically to one site within Richmond. In relation to the points made regarding specialist housing and loss of housing policies, additional information on housing delivery and |

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| | Twickenham Ltd | | | | Consistent with national policy | | | housing needs is within the Housing Delivery Background Topic Paper, and the Affordable Housing Background Paper, which provides more clarity on housing needs within the borough and why any loss of housing needs, including specialist housing, needs to be carefully considered due to the high level of housing need within the borough. |
| - | | | | | | Policy 13 Housing Mix and Standards | | |
| 378 | Rosanna Tunnadine, Habinteg | Publication Local Plan - Page 227 - Section 17 - Housing Mix and Standards - Policy 13.E | | | | <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. 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>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 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." 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. 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. Habinteg believes that every local plan needs to:</p> <ul style="list-style-type: none"> • Establish clear requirements for a proportion of all new housing to be built to the Building Regulations optional access standards. • 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. <p>We are therefore encouraged to see these standards specifically mentioned in policy 13.E.</p> <p>Suggestions for final policy wording 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. We have identified good practice in drafting local planning policies that may help with this, for example a paragraph stating: '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>Support noted. The Council's Specialist Housing Occupational Therapists role is to ensure M4(3) and M4(2) standards are properly met within proposals for affordable housing and where resources allow may be able to offer guidance on private housing. They are involved in the planning stage as well as the construction phase meaning plans properly reflect accessible and adaptable requirements. This means working closely with developers to ensure building control requirements and policy requirements are suitably met onsite. It is therefore considered the processes are in place to ensure the delivery of accessible and adaptable dwellings without the need for additional policy amendments, with part E of the policy clear the policy applies to all new build housing and paragraph 17.54 references application to all tenures as set out in the London Plan. In relation to distinguishing wheelchair provision in affordable and market homes (point 3) this is covered in paragraph 17.55.</p> |

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| | | | | | | | | | <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. Reasons for the proposed amendment – 4 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>c. Relevant Policies and other evidence Relevant housing policies from the London Plan, NRRF and LHNA referred to above.</p> <table border="1" data-bbox="706 760 1546 1906"> <tr> <td data-bbox="706 760 854 1663"> National Planning Policy (NPPF) Framework 2021 – Plan making and delivery </td> <td data-bbox="854 760 1546 1663"> Strategic policies 20. Strategic policies should .. make sufficient provision for a) housing (including affordable housing) 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. 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. Preparing and reviewing plans 31. 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Local Plan proposed amendment – 4 Policy 13. Housing Mix and Standards A 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 and in line with the LHNA priorities of 3 and 4 bed family housing for social rent and specialist accommodation.</p> | <p>The policy allows some flexibility to take into account potential changes to requirements within the housing mix and ensures Registered Providers have clear input into the housing mix proposed on a site, as set out in Policy 11 part C. It is important to accept that the types of properties required could change over the Local Plan period therefore a policy that is too rigid could be counter productive in delivering much needed affordable housing, as well as take into account the site-specifics of the location as set out in paragraph 17.47 of the Plan.</p> |
| National Planning Policy (NPPF) Framework 2021 – Plan making and delivery | Strategic policies 20. Strategic policies should .. make sufficient provision for a) housing (including affordable housing) 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. 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. Preparing and reviewing plans 31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. Development contributions 34. 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. Examining Plans 35. ...Plans are 'sound' if: a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs ²¹ ; and is informed by agreements with other authorities b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters.. d) Consistent with national policy – enabling the delivery of sustainable development .. | | | | | | | | | | | | | |
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| | | | | | | | <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>NPPF 2021 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>Housing Needs Assessment 2023 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"> • 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; • ‘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.. • mental health difficulties, with a potential need for up to 100 units identified .. • A lack of specialist supported living or extra care provision for adults with physical or sensory needs in the Borough. <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 | N | 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).</p> <p>[See Appendix 6, along with the Council's Statement of Consultation (June 2023) 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> | | The Council’s response to the respondent’s comment on the Regulation 18 Plan (comment 784) was that a reference to the NDSS is not considered necessary, and there is sufficient clarity on the nature of external amenity space. It is noted that the Housing Design Standards London Plan Guidance has now been adopted and states that enclosing balconies as glazed, ventilated winter gardens is appropriate in some |

| | | | | | | | | | | | | circumstances where dwellings will be exposed to high levels of noise and/or strong wind, particularly at a high level. It remains therefore that a reference to winter gardens is not considered necessary. An Additional Modification could be considered to update paragraph 17.60 to reflect the Mayor's Housing Design Standards has been finalised. | | | | |
|--|---|--|----|----|----|---|---|---------|--------------------------------|--|---|---|--|--|--|----------------|
| - | Jenny & Rod Linter | Policy 13 Housing Mix and Standards | | No | | Justified | [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. | | | | | Policies 11, 12 and 13 all include requirements for the type of housing including an overall boroughwide target of 50% affordable housing, and recommendations on the sizes of homes required reflecting the Local Housing Needs Assessment which is part of the evidence base for the Local Plan. In addition, within any new developments delivered the affordable housing part is controlled, including social rented properties which are only let to those on the housing register and are let on the basis of a priority allocations system, where households on the housing waiting list are categorised based on their circumstances. Shared ownership properties have income caps applied to them, so households earning over a certain amount would not be able to acquire the property. However, these controls are only applicable to the affordable homes. | | | | |
| - | | | | | | | Policy 14 Loss of Housing | | | | | | | | | |
| - | Victoria Chase (WSP), The Boathouse Twickenham Ltd | Policy 14 Loss of Housing | No | No | No | Positively Prepared ; Justified; Effective; Consistent with national policy | [See comment 470 in relation to loss of housing and The Boathouse site] | | | | | The comment highlights the policy relating to the loss of housing will be detrimental to the provision of replacement housing, however, this is a long-standing policy approach which reflects the London Plan. The Housing Delivery Background Topic Paper shows the existing policy has not negatively impacted on housing completions and provides dialogue into some of the reasons behind recent lower levels of delivery. | | | | |
| - | | | | | | | Policy 15 Infill and Backland Development | | | | | | | | | |
| 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 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.</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 Parking Standards, Cycle Parking, Servicing and Construction Logistics Management'</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 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. | 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 Parking Standards, Cycle Parking, Servicing and Construction Logistics Management' | | | Support noted. |
| 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 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. | 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 Parking Standards, Cycle Parking, Servicing and Construction Logistics Management' | | | | | | | | | | | | | | |
| 382 | James Stevens, | Policy 15 Infill and | | No | | Justified | Part A 1 is unsound because it is unjustified. | | | 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 | Comments relating to the London Plan are outside the scope of the Local Plan. The | | | | | |

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| | Home Builders Federation | Backland Development | | | | <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:</p> <p><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:</p> <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></p> | (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> | proposed amendment would not align with other parts of the Plan - particularly employment policies and the spatial strategy where major / higher density development is directed towards the town centres or well connected places. The Local Plan evidence base concludes there is a need for additional Employment Floorspace and this wording could result in conflicts with employment policies within the Plan. The opening of part A of Policy 15 already expects all suitable and available brownfield sites to optimise delivery, and provides a positive framework to assess proposals. Policy 16 part B is already clear that outside of the Areas for Intensification, development will be considered provided there are no unacceptable impact(s) identified against other policies in the Plan. |
| - | | | | | | Policy 16 Small Sites | | |
| 383 | Katherine Drew, The Royal Parks | Policy 16 Small Sites | | | | <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 Council's Statement of Consultation (June 2023) 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]</p> | | The Council's response to the respondent's comment on the Regulation 18 Plan (comment 791) was that consideration of impacts on infrastructure from small sites is not practicable, as the Plan recognises the cumulative impact but the policy threshold is set at major applications for impacts such as on open space. No changes to the Plan are considered necessary. |
| 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. Result in no net loss of existing biodiversity or significant loss of open space or garden land.</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.' | The existing policy would allow for losses to be mitigated in accordance with other policies in the Plan, as long as it does not result in a net loss of biodiversity. The Council places great importance on biodiversity and open spaces within the borough and this amendment to the policy would not align with the wider strategic aims of improving biodiversity and preserving important open spaces within the borough. Note the policy no longer has a plan-led assumption against development on back gardens because this is no longer supported by the London Plan, |
| 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</p> | | The adopted Plan went through examination applying an affordable housing contribution to sites below 10 dwellings on a gross basis, which is a long-standing policy approach. There is updated evidence to support this continued approach to small sites included within the Affordable Housing and Housing Delivery Background Topic Papers. The background papers also provide detail on the proportion of dwellings completed on small sites. |

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| | | | | | | <p>on small sites. This is not an absolute figure; it provides an 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> | | <p>In relation to the supply of small sites the Council can support a 5 year housing land supply with further detail included within the recent Housing Authority Monitoring Report. At present the Council does not feel there is a need to carry out a call for sites, however a call for sites may be considered further into the plan period.</p> <p>The emphasis on directing development to within PTAL 3-6 does not prevent development outside of these areas, the policy purely aims to focus development on areas where public transport is more accessible. Access to public transport varies across the borough, with Public Transport Accessibility Levels (PTALs) ranging from 6a (the second highest level) in Richmond and 5 in Twickenham, to PTAL 2 and below in most of the borough with access to public transport limited in many parts including parts of Ham and in the west of the borough. See also response to comment 382.</p> | |
| - | Victoria Chase (WSP), The Boathouse Twickenham Ltd | Policy 16 Small Sites | N | N | N | Positively Prepared ; Justified; Effective; Consistent with national policy | [See comment 470 in relation to small sites and The Boathouse site] | | The Council understands the significant contribution made to overall housing completions by small sites, more detail on this is included within the Housing Delivery Background Topic Paper. See also response to comment 470. |
| - | | | | | | | Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic | | |
| 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 | | | | | <p>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).</p> <p>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).</p> <p>Ensure that residents that leave their rubbish out on the road are not allowed to do so in plastic bags etc.</p> | | Support noted. Comments relating to waste collection are beyond the scope of the Local Plan. However, Policy 48 relates to the requirement for adequate servicing arrangements. The Council’s SPD, Refuse & Recycling: Storage and Access Requirements for New Developments (2022) provides more detail on requirements and is referenced through Policy 7. |
| 387 | Tim Catchpole, Mortlake with East Sheen Society | Shaping and supporting our town and local centres | | | | | <p>Theme: Shaping and supporting our town and local centres (Policies 17-20)</p> <p>[See the Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments – comments 796, 803, 810, and 815 in relation to these policies]</p> <p>No comments on your responses.</p> | | Noted. |
| - | Peter Thompson, National Physical | | | | | | [See comment 132 in relation to Policy 17 and NPL] | | See Council’s response to comment 132. |

| | Laboratory (NPL) | | | | | | | | |
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| - | | | | | | | Policy 17 Supporting our Centres and Promoting Culture (Strategic Policy) | Modification(s) consider necessary | Council's response |
| 388 | Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer | Policy 17 Supporting our Centres and Promoting Culture (Strategic Policy) | N o | 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 Council's Statement of Consultation (June 2023) 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] | | The Council has addressed the respondent's comments on the Regulation 18 Plan (799 & 800) as follows: <ul style="list-style-type: none"> Policy 17 (A) 2 has been amended to include reference to Site Allocations. The supporting text has been updated to reflect the findings of the RLNS Phase 2 Report. The report findings indicate that there is no need to identify further Site Allocations to meet retail need in addition to those identified within the Local Plan. However, the supporting text has been amended in paragraph 18.6 to recognise that not all development will be able to be accommodated in vacant space. The Regulation 19 Plan takes account of the RLNS Phase 2 Report which included an up-to-date household survey and the Assessment of Borough Centres 2023 report which presents a range of quantitative and qualitative data on centres in the borough. |
| - | | | | | | | Policy 18 Development in Centres | | |
| 389 | Tom Clarke, Theatres Trust | Policy 18 Development in Centres, A.8 & designation of Cultural Quarters on the Policies Map | Y es | Y es | Y es | | Theatres Trust welcomes the support given to Cultural Quarters, and of inclusion of theatres within the Cultural Quarter designations in both Richmond and Twickenham. | | Support noted. |
| 390 | Solomon Green | 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. | | Comment noted. |
| 391 | Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer | Policy 18 Development in Centres | N o | 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 Council's Statement of Consultation (June 2023) 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.] | | The Council's response to the respondent's comment (806) on the Regulation 18 Plan highlighted the amendments made in the Regulation 19 Plan including the further research and designation of primary shopping areas and clarification in the policy text. It is noted that Part C has been amended to refer to Site Allocations and Part F amended to remove reference to out of centre development not being considered appropriate. An Additional Modification could be considered as part of further work during the Examination process if it is felt that further reference is necessary. It is considered that even if a Site Allocation contains an element of retail, there may be |

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| | | | | | | | | | | circumstances where a sequential test is needed, for example where there is a change in the type of retail proposed which would significantly alter the retail nature of the development. |
| 392 | Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer | Policy 18 Development in Centres | N | N | N | 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. | | An Additional Modification could be considered for clarification to cross-reference at part C that major development should be located within town centres or Site Allocations meeting the requirements of Policy 17 A 2. |
| 393 | Olivia Russell (CBRE), Rugby Football Union (RFU) | Policy 18 Development in Centres | Y | N | Y | Justified; Consistent with national policy | Policy 18 (Development in Centres) 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. | | | Noted. |
| 394 | Louise Fluker, The Richmond Society | Policy 18 Development in Centres, Para 18.17 | Y | N | Y | 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)". | | Noted. The aim of Policy 48 is in part to ensure that there are adequate arrangements for servicing arising from new development. |
| 395 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (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 Council's Statement of Consultation (June 2023) 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] | | | The Council's response to the respondent's comment on the Regulation 18 Plan (comment 805) considered that there is up-to-date, thorough and coordinated evidence to support the Regulation 19 Plan. In relation to retail, Lichfields published the Phase 2 Retail Report in 2023. The Council continues to monitor its centres notably through the publication of the Assessment of Borough Centres 2023 (4 volumes plus Summary) and annual surveys of land uses (most recently carried out in 2023), which are published as part of the Authority Monitoring Report series . |
| - | Gerard Manley (Firstplan), Baden Prop Limited | | | | | | [See comment 250 in relation to Site Allocation 25, Policy 18 and the Town Centre, Retail and Leisure Study] | | | See Council's response to comment 250. |
| - | | | | | | | Policy 19 Managing the Impacts of Development on Surroundings | | | |
| 396 | Tom Clarke, Theatres Trust | Policy 19 Managing the Impacts of Development on | Y | Y | Y | | 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.' | | An Additional Modification to part A2 could be considered to widen the application of the policy to uses beyond those with late licenses, bringing the policy more closely in line with London Plan policy D13 and paragraph 187 of the NPPF. |

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| | | Surrounding s A.2 | | | | | | |
| 397 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 812 in relation to the evening and night time economy] | The Council's response to the respondent's comment on the Regulation 18 Plan (812) was that the planning and licensing policies are sufficiently robust to ensure that impact on residential amenity is taken fully into account and that 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. No further amendments are considered necessary. |
| - | Julie Scurr | | | | | | [See comment 239 in relation to the night time economy in Richmond] | See response to comment 397 above. |
| - | | | | | | | Policy 20 Shops and Services Serving Essential Needs – no comments received | |
| - | | | | | | | Increasing jobs and helping business to grow and bounceback following the pandemic | |
| 398 | Claire Wilmot | 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. | Comments noted. Application 19/2035/OUT related to the redevelopment of 2-4 Udney Park Road for 21 retirement flats. The application was refused and a subsequent appeal against the Council's decision was dismissed. Although the proposal may have generated some employment, when considered against the adopted Local Plan it would have led to the loss of the industrial use on the site. It is the Council's priority to protect sites with an existing industrial use unless it can be shown through robust marketing that there is no longer a demand. There is a need to protect a range of types of employment land to support different sectors with operational yard space recognised in London Plan Policy E7. |
| 399 | Jon Rowles | 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. | Comments noted. Duty to cooperate discussions take place with neighbouring boroughs during the preparation of the Local Plan, see the Duty to Cooperate Statement. These boroughs undertake their own assessments of need for housing and employment land and the supply of land in surrounding boroughs is also constrained. Given the borough has identified demand for employment floorspace that cannot be met through its existing sites, it follows that these should continue to be protected through the Council's planning policies. |
| 400 | Kay Collins (Solve Planning), Port Hampton Estates Limited | Employment Policies (Policies 21, 23 and 24) | | | | | Employment Policies (Policies 21, 23 and 24) Employment policies relevant to the island are as follows: Policy 21. Protecting the Local Economy (Strategic Policy) 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. 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. ... | Objection noted. The Council's response to the respondent's comment on the Regulation 18 Plan (comment 819) was that the planning application process allows officers to weigh Local Plan priorities with site specific circumstances. |

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| | | | | | | <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>Policy 23. Office Retention of offices</p> <p>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>Policy 24. Industrial land Retention of industrial space</p> <p>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 re-provision 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 | N | N | Positively Prepared ; Justified; Effective; Consistent with national policy | <p>Employment</p> <p>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 paragraph 4.19 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. Draft Policies 21 and 23 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. Draft Policy 21 goes on to promote the supply of affordable workspace to support small and medium sized enterprises, as identified in draft Policy 25, 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". 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.</p> <p>Crucially, the potential for a co-location of uses on locally important industrial sites is allowed for under London Plan Policy E7. London Plan Policy E7(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". Policy E7(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 Policy E7(D) can be met.</p> <p>In this respect, the Publication Draft Plan is not legally compliant, nor sound.</p> | <p>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)</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 draft Policies 21, 23 and 24 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, Draft Policy 24 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 draft Policy 24(A) 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 <u>floorpace</u> and promotes net increases where feasible. This flexibility could be allowed for through deletion of "Proposals which result in a net loss of industrial land will be refused". 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 floorpace, whilst meeting other policy aspirations.</p> | <p>Objection noted.</p> <p>The Council's response to the respondent's comment on the Regulation 18 Plan (comment 841) noted the evidence base findings that there were low vacancy rates and high demand for industrial land and floorspace in the borough. Reference was also made to the pre-application discussions regarding the site and need to consider proposals for mixed-use on designated sites on a case-by-case basis, taking into account other Local Plan priorities to determine if there are exceptional circumstances.</p> |
| 402 | Jonathan Blathwayt, | Industrial and | | | | 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 | | Comments noted. |

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| | GLA on behalf of Mayor of London | Employment Land | | | | | 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. | | The Council's Employment Land and Premises Needs Assessment considers industrial and warehouse uses as one property market sector because in Richmond this total market is relatively small with occupiers using these types of units in flexible ways. Therefore, it is not possible to disaggregate the data to form a meaningful analysis. Noting the publication of the London Plan Guidance on Industrial Land and Uses, an additional modification could be considered to add reference to this in the supporting text to Policy 24. |
| 403 | Duncan McKane, London Borough of Hounslow | Policy 23 Offices, Policy 24 Industrial Land | | | | | Employment Policies 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. | | Comments noted. See the Duty to Cooperate Statement and Statement of Common Ground with LB Hounslow for further details on the strategic cross-boundary matters. |
| - | | | | | | | Policy 21 Protecting the Local Economy (Strategic Policy) | | |
| 404 | Nick Alston (Avison Young), The Offer Group Ltd | Policy 21 Protecting the Local Economy (Strategic Policy) | | N | o | | Positively Prepared ; Justified; Effective; Consistent with national policy [See also comment 409 in relation to Policy 23 Offices] Draft Richmond Local Plan (Regulation 19) Consultation Response 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: "New development proposals will be supported which: 1. Protect existing employment floorspace for office use, with a no net loss approach..." 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"> 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); 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); 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 It is not effective – as a consequence of the above, the wording of the policies is not effective. [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: Policy 21 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. Retain Protect existing employment floorspace capacity for office use, with a no net loss approach . The intensification of existing sites in office use is encouraged, to include the introduction of complementary alternative uses, including housing. 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. ... | Objection noted. |
| 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 Council's Statement of Consultation (June 2023) 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] | | Resubmission of comments to Regulation 18 Plan noted. The Council's response to the respondent's comment on the Regulation 18 Plan (comment 829) was that impacts on existing open spaces (including Royal Parks) are considered elsewhere in the Plan. |
| 406 | Summer Wong (RPS), Notting Hill Genesis | Policy 21 Protecting the Local Economy (Strategic Policy) (p.253-254), | N | N | N | | Positively Prepared ; Justified; Effective; Consistent with national policy Policy 21 Protecting the Local Economy (Strategic Policy) (p.253-254) 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.' | Recommended Amendment Policy 21 Part A) Point 1) 'Protect existing employment floorspace for office use, with a no net loss approach . 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 viable existing employment land within designated employment areas'. This would better reflect the supporting paragraphs of London Plan Policy E4. | Objection noted. The comment relates to St Clare Business Park, which has been subject of recent planning applications. Committee resolved to approve application reference 22/2204/FUL for the redevelopment of St Clare's Business Park on 11 October 2023. |

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| | | Paragraph 19.3 | | | | national policy | 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. | | The application includes the re-provision of a significant amount of the existing employment floorspace on the site (circa. 50%), alongside residential (including affordable housing). |
| 407 | Michael Amherst | Para 19.1 - Key Business Plan | N | N | N | Justified; Consistent with national policy; Effective | 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 configured (as a period property) to be reconfigured or made attractive to prospective office tenants. The only user they can foresee for it is to return it to flats. 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. 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'. 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. | 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. | Objection noted. |
| - | James Sheppard (CBRE), LGC LTD | | | | | | [See comment 401 in relation to Policy 21 and the LGC site] | | Comment noted and responded to elsewhere. |
| - | Kay Collins (Solve Planning), Port Hampton Estates Limited | | | | | | [See comment 400 in relation to Policy 21 and Platt's Eyot] | | Comment noted and responded to elsewhere. |
| - | Peter Thompson, National Physical Laboratory (NPL) | | | | | | [See comment 132 in relation to Policy 21 and NPL] | | Comment noted and responded to elsewhere. |
| - | | | | | | | Policy 22 Promoting Jobs and our Local Economy | | |
| 408 | Katherine Drew, The Royal Parks | Policy 22 Promoting Jobs and our Local 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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 821 in relation to mitigation of increase in footfall] | | Resubmission of comments to Regulation 18 Plan noted. The Council's response to the respondent's comment on the Regulation 18 Plan (comment 821) was that impacts on existing open spaces (including Royal Parks) are considered elsewhere in the Plan. |
| - | James Sheppard (CBRE), LGC LTD | | | | | | [See comment 401 in relation to Policy 22 and the LGC site] | | Comment noted and responded to elsewhere. |
| - | Peter Thompson, National Physical Laboratory (NPL) | | | | | | [See comment 132 in relation to Policy 22 and NPL] | | Comment noted and responded to elsewhere. |

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| | | | | | Policy 23 Offices | | |
| 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] 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> [see comment 404 in relation to the above represents an overly restrictive policy position]</p> <p>Reasoned Justification</p> <p>Findings of the Council’s Evidence Base</p> <p>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.</p> <p>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 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” (para. 3.97)</i></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 for other uses, 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. 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>Compliance with National Planning Policy</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>Policy 23 Retention of offices</p> <p>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. Proposals which result in a net loss of office floorspace will be refused.</u> 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> | Objection noted. |

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| | | | | | | <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:</p> <p><i>“Existing viable 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 viable 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>Summary</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> | | |
| 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) | N | N | 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>Section 1 Introduction</p> <p>1.1 The following Representations have been prepared by Firstplan Ltd (herein referred to as ‘Firstplan’) on behalf of ‘William Grant & 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"> • Marketing Report by Stirling Shaw [at Appendix 2] [See Appendix 8 to this schedule] • Employment Evidence review by Lichfields [at Appendix 3] [See Appendix 8 to this schedule] <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>Section 6 Changes Required to Make the Draft Local Plan ‘Sound’</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>Draft Policy 23 ‘Offices’ and Supporting Text</p> <p>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 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>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. [End]</p> <p>Paragraph 19.19</p> <p>“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-</p> | Objection noted. |

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’.

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.

1.9 WGS would welcome early discussions with the Council regarding these Representations and amendments to the proposed policy and land use allocation.

Section 2 Relevant Background and Site Information

a) Background to the Site

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.

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.

2.3 The site, together with its immediate context, is demonstrated at Figure 1.



Figure 1. Aerial view of Independence House site (Google Maps 2023)

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

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.~~

Paragraph 19.24

This paragraph is no longer considered necessary in the light of the existing Article 4 direction and Policy 23.

Paragraph 19.25

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”.

[See comment 565 on Appendix 2 marketing requirements]

Proposed Policies Map

Removal of the ‘Key Business Area’ designation to Independence House, 84 Lower Mortlake Road.

6.3 Early discussion with the Council with regard to the Representations made and suggested changes would be welcomed.

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| | | | | | <p>Consultants, which has identified no credible interest for the building's reoccupation, as summarised in the Marketing Report.</p> <p>b) Planning history</p> <p>i) <u>The site</u></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>ii) <u>Surrounding area</u></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>iii) <u>Pre-application advice request, 2022-2023</u></p> <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 "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" (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>c) Marketing Report by Stirling Shaw (June 2023)</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 Appendix 2. The</p> | |
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| | | | | | <p>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"> • 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 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. • 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. • 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. • There is demand from other sectors such as nursery providers but due to a lack of sufficient external space the building is not suitable. • 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 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. <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>d) Summary</p> <p>2.16 The following key points are drawn from this section:</p> <ul style="list-style-type: none"> • 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. • 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. • 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. • 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. • 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. <p>Section 3 Planning Policy Context</p> <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>a) National Planning Policy Framework (NPPF, 2021)</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 Paragraph 16 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> | | |
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| | | | | | <p>3.5 Paragraph 31 states 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”.</p> <p>3.6 Paragraph 35 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>“a) <u>Positively prepared</u> – 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) <u>Justified</u> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) <u>Effective</u> – 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>d) <u>Consistent with national policy</u> – 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 Paragraph 81 sets out that: “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.”</p> <p>3.8 Paragraph 82 goes on to say: “Planning policies should:</p> <p>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;</p> <p>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;</p> <p>c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and</p> <p>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.”</p> <p>3.9 Section 11 relates to making effective use of land. Paragraph 119 sets out that: “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.”</p> <p>3.10 Paragraph 120 goes on to say that ‘Planning policies and decisions should: (<i>inter alia</i>)</p> <p>“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;</p> <p>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).”</p> <p>3.11 Paragraph 122 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> <p>b) London Plan (2021)</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> | | |
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| | | | | | <p>3.14 Policy E1 'Offices' (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: "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 releasing surplus office capacity to other uses". (our underlining)</p> <p>3.15 Part I goes on to state that: "The redevelopment, intensification and change of use of surplus office space to other uses including housing is supported, subject to the provisions of Parts G and H." (our underlining)</p> <p>3.16 For completeness, the provisions referred to are as follows: 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."</p> <p>3.17 Surplus Office Space is defined at paragraph 6.1.7 as follows: "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 (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). This evidence should be used to inform viability assessments."</p> <p>c) Existing Richmond Local Plan (2018) ('2018 Local Plan')</p> <p>3.18 Adopted Policy LP41 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: "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"</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 (Local Policy DM EM2). This set out that: "The use of employment land for other purposes will only be permitted where: (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) A sequential approach has been applied to the development of the site as follows: i) solely employment-based redevelopment; 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; iii) maximum provision of affordable housing in accordance with CP19; Or (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."</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: "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 Employment Sites and Premises Reports produced by Peter Brett</p> | | |
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| | | | | | <p>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.”</p> <p>3.23 Subsequent to these responses, in considering this matter the Inspector concluded in their report on the 2018 Local Plan that:</p> <p>“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”.</p> <p>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.</p> <p>d) Current Planning Policy Overview</p> <p>3.25 The following key points can be drawn from the existing planning policy framework:</p> <ul style="list-style-type: none"> • 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 <i>‘do not generally apply to sites in the KOAs’</i>. • 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. <p>Section 4 Evidence Base and Draft Policy</p> <p>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.</p> <p>a) Evidence Base Documents for Reg 18 consultation</p> <p>i) <u>Employment Land and Premises Needs Assessment 2021 (‘ELPNA 1’)</u></p> <p>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.</p> | | |
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| | | | | | <p>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:</p> <p>“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 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) Evidence Base Documents for Reg 19 consultation</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>“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.</p> <p><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.</u></p> <p><u>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> (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>c) Regulation 19 Local Plan draft [See comment 359 on Policy 10] [See comment 371 on Policy 11]</p> <p>4.13 Draft Policy 23 specifically relates to offices and identifies a need to retain offices, setting out that:</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> | | |
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| | | | | | <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: “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 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.”</p> <p>4.16 This indicates that marketing evidence can be a material consideration, regardless of whether the site is located in a KBA. Draft Appendix 2 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: “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.”</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>D) Evidence Base overview</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"> • 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. • 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. • Draft Policy 23 does not provide a mechanism for loss of surplus office space to reflect the findings of the ELPNA 2 or the London Plan. 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 | | |
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d) which requires policies to be clearly written and unambiguous, so it is evident how a decision maker should respond to development proposals.

- 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.”

- 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.

Section 5 Response on Legal Compliance and 'Soundness' of the Draft Local Plan

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:

- That the allocation of Independence House, 84 Lower Mortlake Road as a Key Business Area is not justified or appropriate; and
- 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.

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.

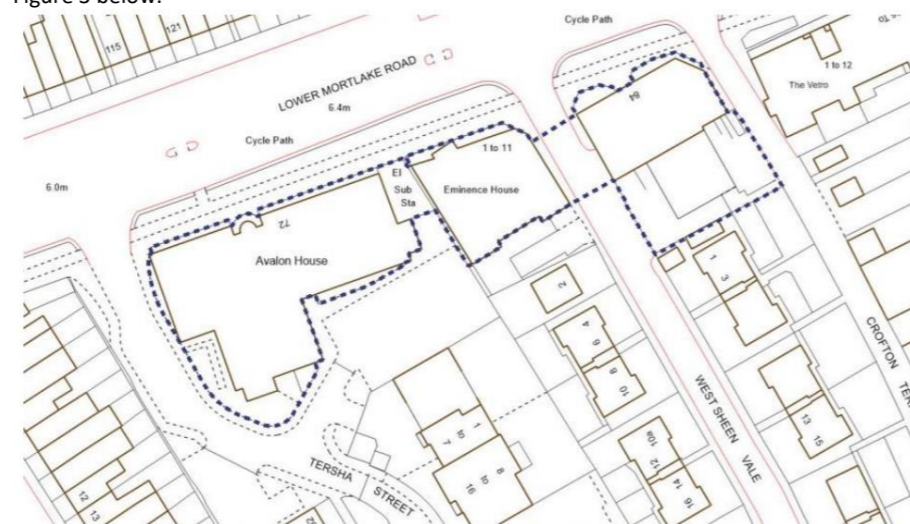


Figure 3. Extract from draft Local Plan Map (Reg 19, 2023)

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

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| | | | | | <p>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.</p> <p>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:</p> <p>“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.”</p> <p>5.9 This position is also emphasised by Lichfields in the Employment Evidence review, where it is concluded (at Paragraph 5.2.7) that:</p> <p>“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.</p> <p>5.10 The report also concludes (at Paragraph 5.2.5) that:</p> <p>“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> <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"> • The Plan is not positively prepared: 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. • The Plan is not justified: 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. • The Plan is not consistent with National or London-wide Policy: 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>. | |
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| | | | | | <p><u>b) 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></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 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>“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. 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. 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</p> | | |
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| | | | | | <p>provisions of National Planning Policy Framework (NPPF) paragraph 82 which requires policies to “allow for new and flexible working practices”.”</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"> • 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. • 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. • 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. <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"> • The Plan is not positively prepared: 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. • The Plan is not justified: 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 | |
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| | | | | | | <p>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.</p> <p>• The Plan is not consistent with National or London-wide Policy: 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.</p> <p>c) Summary</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), Baden Prop Limited | 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) | N | N | Y | <p>Positively Prepared ; Justified; Consistent with national policy</p> <p>[See comment 250 on Site Allocation 25]</p> <p>ii. KBA's inclusion of Westminster House – Designation is not justified</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 Table 1, 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 "period of reconstructing" with (amongst other evolutive changes) "changing work styles supportive by advances in technology". 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> <div style="border: 1px solid black; padding: 5px;"> <p style="text-align: center;">The Plan is not prepared positively</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> </div> <div style="border: 1px solid black; padding: 5px;"> <p style="text-align: center;">The Plan has not been justified</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> </div> <div style="border: 1px solid black; padding: 5px;"> <p style="text-align: center;">The Plan is not consistent with National or London-wide Policy</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> </div> <p>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.</p> | <p>[See comment 250 on Site Allocation 25]</p> <p>ii. Proposed Policy Map Changes</p> <p>KBA: Removal of the 'Key Business Area' designation (i.e. redrawing the boundary to exclude) in relation to Westminster House.</p> <p>iii. Proposed Changes to draft Policy 23 and supporting text</p> <p>POLICY 23 TEXT:</p> <p>Original Policy Text:</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>Suggested Additional Policy Paragraph:</p> <p>(add: "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."</p> <p>SUPPORTING PARAGRAPH 19.19:</p> <p>"Where a proposal involves a change of use (omit: '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 the marketing requirements in Appendix 2. (Omit: Such evidence will be a material consideration, however provision of marketing in itself does not justify an exception to policy.)"</p> <p>SUPPORTING PARAGRAPH 19.24:</p> <p>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>APPENDIX 2, PARAGRAPH 28.10</p> <p>It is suggested that this paragraph is no longer needed given inline with the reasoning above.</p> <p>Overall BPL are confident that the above amendments would allow for the plan to be considered 'sound' and legally compliant.</p> | Objection noted. |

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| | | | | | | <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: "period of reconstructing" and: "changing work styles", 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 "material planning consideration" 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;">The Plan is not prepared positively</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;">The Plan has not been justified</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;">The Plan is not consistent with National or London-wide Policy</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> | | | |
| - | Jonathan Blathwayt, GLA on behalf of Mayor of London | Policy 23 Offices | | | | [See comment 402 in relation to office growth] | | Comment noted and responded to under Policy 20. | |
| - | Michael Amherst | Key Business Plan | N | N | N | Justified; Consistent with national policy; Effective | [See comment 407 in relation to Key Business Areas and the use of Article 4] | Comment noted and responded to under policy 21. | |
| - | James Sheppard (CBRE), LGC LTD | | | | | [See comment 401 in relation to Policy 23 and the LGC site] | | Comment noted and responded to elsewhere. | |
| - | Kay Collins (Solve Planning), Port Hampton Estates Limited | | | | | [See comment 400 in relation to Policy 23 and Platt's Eyot] | | Comment noted and responded to elsewhere. | |
| - | | | | | | Policy 24 Industrial Land | | | |
| 412 | Summer Wong (RPS), | Policy 24 Industrial Land (p.261- | N | N | N | Positively Prepared ; | Policy 24 Industrial Land (p.261-262) | Recommended Amendment Policy 24 Part A) there is a presumption against loss of industrial land in all parts of the borough. Proposed which result in a net loss of industrial land will be | Objection noted. See response in relation to comment 406. |

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| | Notting Hill Genesis | 262), Paragraph 19.29 | | | | Justified; Effective; Consistent with national policy | <p>Policy 24 Part A) 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. Any redevelopment proposals are required to contribute to a net increase in industrial floorspace.’</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>refused. Any redevelopment proposals should seeks to be required to contribute to a net increase in industrial floorspace where feasible.</p> <p>Policy 24 Part B) 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</p> <p>Paragraph 19.29) remove ‘St Clare Business Park, Holly Road, Hampton’ from the list of LSIS.</p> | <p>It is appropriate to retain the LILBP designation for this site given the quantum of commercial floorspace (existing and proposed through the above planning application).</p> <p>The new Local Plan seeks to ensure that affordable workspace is secured in all commercial developments above 1,000sqm. It is therefore applicable to refer to it in this policy, recognising that within an industrial scheme exceeding the threshold it would be appropriate for this to be light industrial floorspace. It is noted that policy 23 on offices also references the requirement for affordable workspace, which is then covered in more detail under policy 25.</p> |
| - | Jonathan Blathwayt, GLA on behalf of Mayor of London | Policy 24 Industrial Land | | | | | [See comment 402 in relation to industrial floorspace] | | Comment noted and responded to elsewhere. |
| - | James Sheppard (CBRE), LGC LTD | | | | | | [See comment 401 in relation to Policy 24 and the LGC site] | | Comment noted and responded to elsewhere. |
| - | Kay Collins (Solve Planning), Port Hampton Estates Limited | | | | | | [See comment 400 in relation to Policy 24 and Platt’s Eyot] | | Comment noted and responded to elsewhere. |
| - | | | | | | | 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 & Hampton Hill to group with similar comments. | | - |
| - | | | | | | | Policy 25 Affordable, Flexible and Managed Workspace | | |
| 413 | Summer Wong (RPS), Notting Hill Genesis | Policy 25 Affordable, Flexible and Managed Workspace (p.264-267) | N | N | N | Positively Prepared ; Justified; Effective; Consistent | <p>Policy 25 Affordable, Flexible and Managed Workspace (p.264-267)</p> <p>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.</p> | <p>Recommended Amendment</p> <p>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, <u>where viable.</u>’</p> | <p>Objection noted.</p> <p>The Employment Land and Premises Needs Assessment included an assessment of the need for affordable workspace in the borough. The findings of the evidence base</p> |

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| | | | | | | t with national policy | 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. | | have informed the policy. Local Plan policies have been subject to viability testing and evidence relating to viability of specific developments is considered on a site-by-site basis. No changes are proposed to the policy. |
| 414 | Duncan McKane, London Borough of Hounslow | Policy 25 Affordable, Flexible and Managed Workspace | | | | | LBH also support the approach to the provision of affordable workspace in Policy 25. | | Support noted. |
| 415 | Peter Thompson, National Physical Laboratory (NPL) | Policy 25 Affordable, Flexible and Managed Workspace | Yes | Yes | Yes | | Policy 25. Affordable, flexible and managed workspace 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. | | Comments/support noted. |
| - | James Sheppard (CBRE), LGC LTD | | | | | | [See comment 401 in relation to Policy 25 and the LGC site] | | Comment noted and responded to elsewhere. |
| - | | | | | | | Policy 26 Visitor Economy | | |
| 416 | Tom Clarke, Theatres Trust | 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. | | Support noted. |
| 417 | Olivia Russell (CBRE), Rugby Football Union (RFU) | Policy 26 Visitor Economy | Yes | No | Yes | Justified; Consistent with national policy | <p>Policy 26 (Visitor Economy)</p> <p>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.</p> <p>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).</p> <p><i>A. The Council will support the sustainable growth of the visitor economy for the benefit of the local area by:</i></p> <ol style="list-style-type: none"> <i>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>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>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>enhancing the environment in areas leading to, within and around visitor destinations where appropriate;</i> <i>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>supporting appropriate development at Twickenham Stadium which complements the use of the site as an internationally significant sports and entertainment venue.</i> <p>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</p> | | Noted. The Council's response to the respondent's comment on the Regulation 18 Plan (comment 854) was that an additional criterion is unnecessary as the list is not exhaustive and the Council's intention of supporting sustainable growth of the visitor economy is clear. |


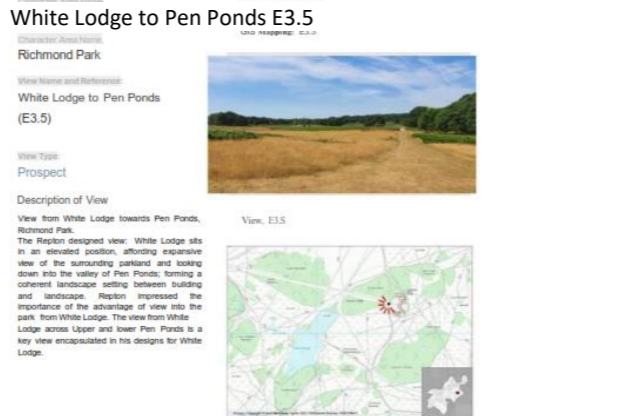
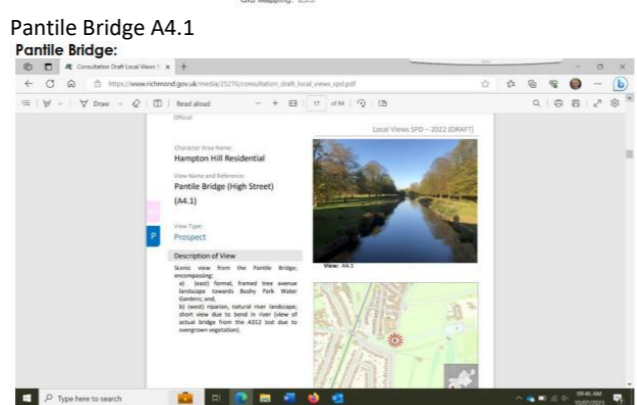
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| | | | | | | | clarification is welcomed, however, the RFU maintain that given the scale and international significance of the Stadium, a specific reference to it should be included within the policy text. | | |
| 418 | Katherine Drew, The Royal Parks | 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 Council's Statement of Consultation (June 2023) 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] | | Noted. The Council's response to the respondent's comment on the Regulation 18 Plan (comment 851) was that the list of attractions in A1 of the policy is not exhaustive, and no amendment considered necessary. |
| - | | | | | | | Policy 27 Telecommunications and Digital Infrastructure (Strategic Policy) | | |
| 419 | Tim Catchpole, Mortlake with East Sheen Society | Policy 27 Telecommunications and Digital Infrastructure (Strategic Policy) | | | | | Theme: Increasing jobs and helping business to grow (Policies 21-27) Policy 27. Telecommunications and digital infrastructure [See the Council's Statement of Consultation (June 2023) 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. | | Many areas of this policy are covered by the Building Regulations (Approved Document R, October 2022) and prior approvals. It is recognised that engagement with local communities is important, however the Council felt it was not proportionate to require all or particular types of applications to be accompanied by visual impact assessment and should be considered where appropriate on a site-specific basis. An additional Modification could be considered to reference the GLA's London Plan Guidance Digital Connectivity Infrastructure (draft October 2023) which aims to clarify key requirements for developments including for example providing with an application evidence of prior community engagement. |
| 420 | Peter Thompson, National Physical Laboratory (NPL) | Policy 27 Telecommunications and Digital Infrastructure (Strategic Policy) | Y | Y | Y | es | We are also pleased to see a commitment to the digital infrastructure in Policy 27. Telecommunications and digital infrastructure. | | Support noted. |
| 421 | Louise Fluker, The Richmond Society | Policy 27 Telecommunications and Digital Infrastructure (Strategic Policy), Paragraph 19.62 | | N | Effective | o | 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" | See response to comment 419. |
| - | | | | | | | Protecting what is special and improving our areas (heritage and culture) | | |
| 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. | | Noted, the Plan as a whole covers these issues. The Council has raised concerns in relation to the Teddington Direct River Abstraction (DRA) project and Thames Water continue to develop the project prior to a formal planning application. |
| - | | | | | | | Policy 28 Local Character and Design Quality (Strategic Policy) | | |
| 423 | Tom Wignall (Avison Young), National Gas | 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. About National Gas Transmission 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. | 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> | <i>An additional modification to the supporting text to Policy 55 Delivery & Monitoring could be during the Examination process, to reference the constraints of existing utilities.</i> |

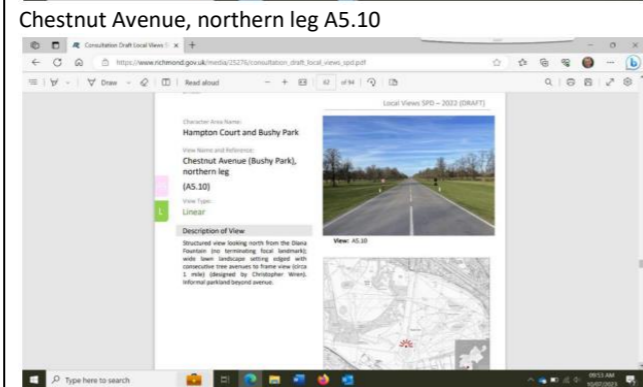
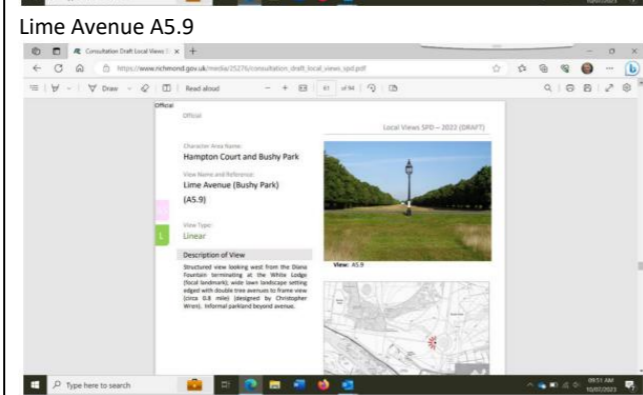
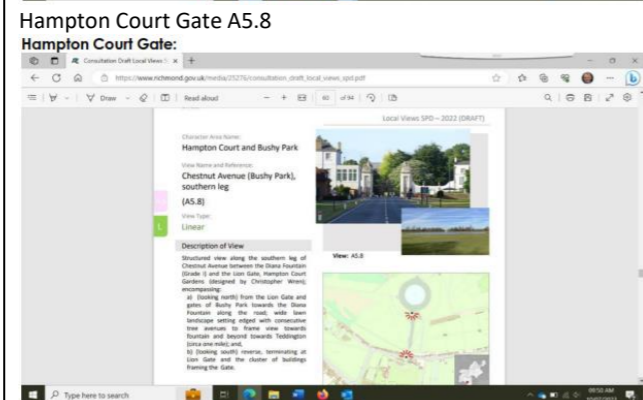
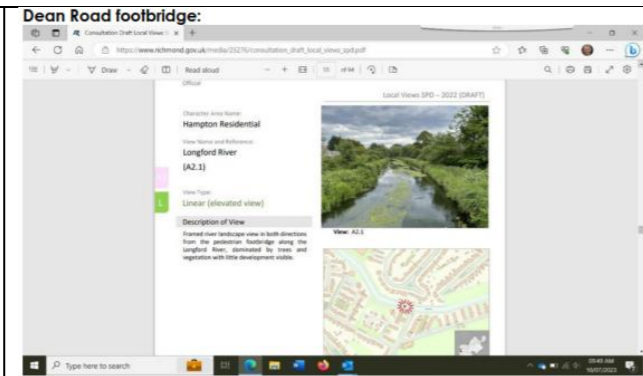
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| | | | | | | <p>Utilities Design Guidance</p> <p>The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure. National 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.</p> <p>[See proposed modification to Policy 28]</p> <p>Further Advice</p> <p>National Gas Transmission is happy to provide advice and guidance to the Council concerning their networks.</p> <p>Please see attached information outlining further guidance on development close to National Gas Transmission assets. [See Appendix 9]</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, 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> | | <p>Note that representations from National Gas have now been submitted separately from those of National Grid (now called National Grid Electricity Transmission).</p> <p>See response to comment 424 from National Grid Electricity Transmission.</p> |
| 424 | Tom Wignall (Avison Young), National Grid Electricity Transmission | 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>About National Grid Electricity Transmission</p> <p>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>Utilities Design Guidance</p> <p>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.</p> <p>[See proposed modification to Policy 28]</p> <p>Further Advice</p> <p>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> | <p>Therefore, to ensure that Design Policy 28 is consistent with national policy we would request the inclusion of a policy strand such as:</p> <p><u>"x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."</u></p> | <p><i>An additional modification could be considered during the Examination process.</i></p> <p>This change was suggested in response to the Regulation 18 consultation to be included under policy 2. Spatial Strategy: Managing change in the borough (Strategic Policy). (Rep 275)</p> <p>The amendment is now suggested to policy 28 which is seeking development to be of high architectural and design quality. It may be more appropriate to include a modification elsewhere in the Plan to address this comment in the supporting text to Policy 55 on Delivery and Monitoring.</p> |
| 425 | Tim Catchpole, Mortlake with East Sheen Society | Policy 28 Local Character and Design Quality | | | | <p>Theme: Protecting what is special and improving our areas (Policies 28-33)</p> <p>Policy 28. Local character and design quality</p> <p>[See the Council's Statement of Consultation (June 2023) 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> | | <p>Comment noted.</p> |
| 426 | Katherine Drew, The Royal Parks | 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.</p> | | <p><i>Resubmission of comments to Regulation 18 Plan noted in relation to Richmond and Bushy Parks and that they should be referenced in the policy given the importance of their character.</i></p> |

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| | | | | | | | [See Appendix 1, along with the Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 861 in relation to the importance and protection of the Parks] | | The Council's response to the respondent's comment on the Regulation 18 Plan (comment 861) was that protection of the Royal Parks is covered under policies 34, 35 and the place-based strategies. |
| 427 | Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer | Policy 28 Local Character and Design Quality | N | N | N | 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 Council's Statement of Consultation (June 2023) 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 .] | | <i>Resubmission of comments to Regulation 18 Plan noted in relation to contributions to enhance the local environment and character.</i> The Council's response to the respondent's comment on the Regulation 18 Plan (comment 867) was that text should be amended to replace 'where appropriate' with 'maximise opportunities to' enhance (in absence of a statutory duty to enhance). No further amendment is therefore considered necessary. |
| 428 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green) | Policy 28 Local Character and Design Quality | | | | | [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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 865 in relation to Policy 28] | | <i>Resubmission of comments to Regulation 18 Plan noted in relation to referencing the Borough's conservation areas as well as to the 'character areas' and 'places in the Urban Design Study'.</i> The Council's response to the respondent's comment on the Regulation 18 Plan (comment 865) was that conservation areas are more specifically considered under policy 29 on designated heritage assets. The purpose of the Urban Design Study is outlined in detail in other parts of the Local Plan. |
| 429 | Peter Willan and Paul Velluet, Old Deer Park Working Group | 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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 866 in relation to Policy 28] | | <i>Resubmission of comments to Regulation 18 Plan noted in relation to referencing the Borough's conservation areas as well as to the 'character areas' and 'places in the Urban Design Study'.</i> The Council's response to the respondent's comment on the Regulation 18 Plan (comment 866) was that conservation areas are more specifically considered under policy 29 on designated heritage assets. The purpose of the Urban Design Study is outlined in detail in other parts of the Local Plan. |
| Policy 29 Designated Heritage Assets | | | | | | | | | |
| 430 | Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer | Policy 29 Designated Heritage Assets | N | N | N | 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. | | Comment noted. The Council's response to the respondent's comment on the Regulation 18 Plan (comment 880) was as follows: <i>The suggested change to part A seeks to reflect the wording of the NPPF, however local policies should instead draw on local requirements. The need to avoid harm and then justify the proposal is the process that needs be undertaken before the harm is balanced against the public benefits. The balance is clearly set out in the NPPF and</i> |

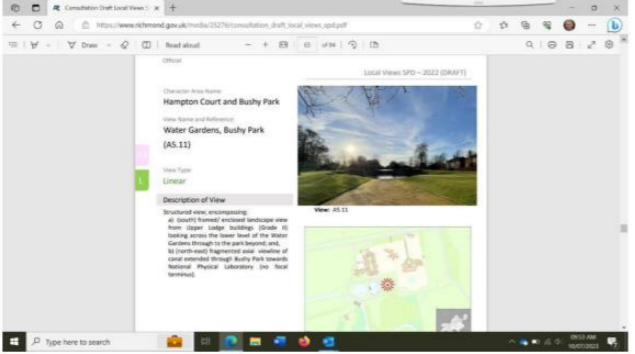
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| | London Historic Parks and Gardens Trust | designated Heritage Assets | | | | | particularly war memorials, locally listed historic parks and gardens and other local historic features. B. There will be a presumption against the demolition of Buildings of Townscape Merit. | 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. | The Council does not currently have any locally listed parks and gardens, however there is an aspiration to do so in the future. The intention is that by referencing the inventory within this policy, that this is something that can be explored further in the future through a process including setting criteria for assessment. Note a suggested additional modification to paragraph 20.41 could be considered to refer to the 'London Historic Parks and Gardens Inventory ' in the Local Plan. |
| 435 | Smruti Patel (Avison Young), Avanton Richmond Developments LTD | Policy 30 Non-designated Heritage Assets | | No | | 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. | | Comment noted. Policy 30 seeks to preserve non-designated heritage assets, and <i>where possible</i> enhance the significance, character and setting of non-designated heritage assets and is therefore in accordance with the NPPF. |
| 436 | Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer | Policy 30 Non-Designated Heritage Assets | No | No | No | Positively Prepared ; Justified; Effective; Consistent with national policy | 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. | | Comment noted. Policy 30 seeks to preserve non-designated heritage assets, and <i>where possible</i> enhance the significance, character and setting of non-designated heritage assets... The Council's response to the respondent's comment on the Regulation 18 Plan (comment 884) was as follows: <i>The policy seeks to preserve, and 'where possible' enhance, the significance, character and setting of non-designated heritage assets and is therefore in accordance with the NPPF. No change is proposed to the policy.</i> |
| - | | | | | | | Policy 31 Views and Vistas | | |
| 437 | Peter Willan and Paul Velluet, Old Deer Park Working Group | 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 Draft Local Views SPD responses schedule] 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]. | | The respondent's comments on the SPD supported the continuation of adopted views and proposed new views in the SPD, but sought clarity including on the mapping and viewing locations and view management of a number of views. A number of new linear and landscape views were proposed – Old Deer Park views landscape, Old Deer Park linear, Twickenham Road Footbridge to St Matthias Church Spire, and Richmond Hill to King's Observatory Old Deer Park. The Council informally considered the SPD responses, although these new views were not proposed for designation, with existing designations and views already covering these locations, Detailed issues on viewing locations and view management can be considered when the SPD is taken forward for adoption. |

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| 438 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (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 Draft Local Views SPD responses schedule] 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. | | See response to Friends of Richmond Green comment 442 below. |
| 439 | Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer | Policy 31 Views and Vistas | N | 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. | | The respondent's comments on the SPD supporting the principles but raising detailed points about the evidence base and that the Urban Design Study lacks crucial information, and expect a consultation on an updated draft SPD with any further details on view management and assessing the impact on views. Suggested in the SPD response proposed amendments to Policy 31 from their Regulation 18 comments. Comments on the details and lack of information on specific views: G1.14 Kew Bridge (east); G1.15 Strand on the Green; G1.16 Parish Church of St. Anne, Kew Green; H1.1 Chiswick Bridge (west); and G2.1 Victoria Gate, Kew Gardens. The Council's response to the respondent's comment on the Regulation 18 Plan (comment 894) highlighted the GLA did not raise any conformity issues with the London Plan. The Council considers the proposed new views are justified, and detailed issues including on view management can be considered when the SPD is taken forward for adoption. |
| 440 | Gary Backler, Friends of the River Crane Environment (FORCE) | 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 Pevensy. [See previous comments in the Draft Local Views SPD responses schedule] | The respondent's comments on the SPD supported the inclusion of A2.1 view of the Longford River, but deeply concerned that the list of local views may not be sufficient as a tool for managing views and that those not on the list have no merit or value, raising that no part of any view of any public open space along the Crane Valley enjoys any protection. Suggested 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 Pevensy. The Council informally considered the SPD responses, although these new views were |

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| | | | | | | | not proposed for designation, with existing designations and views already covering these locations, |
| 441 | Katherine Drew, The Royal Parks | Policy 31 Views and Vistas | | | <p>RE: London Borough of Richmond upon Thames – Local Plan Publication (Regulation 19) Consultation 9 June to 24 July 2023</p> <p>Thank you for consulting The Royal Parks (TRP) on the above proposals.</p> <p>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.</p> <p>After viewing all the details submitted, The Royal Parks would like to make the following comments on the diagrams:</p> <ul style="list-style-type: none"> - 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 <p>TRP welcome in the document the inclusion of the following views:</p> <p>Sawyer's Hill E3.3</p>  <p>White Lodge to Pen Ponds E3.5</p>  <p>Pantile Bridge A4.1</p>  <p>Dean Road footbridge A2.1</p> | | <p>The respondent’s comments on the SPD welcomed the SPD and the proposals for additional views to be protected and specifically inclusion of views from the Royal Parks and as managers of the Longford River. Detailed comment on the nature of the view E3.2 from King Henry’s Mound in Richmond Park to Petersham Park.</p> <p>Detailed issues on viewing locations and view management can be considered when the SPD is taken forward for adoption.</p> |



Water Gardens A5.11

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| 442 | Vivien Harris, Friends of Richmond Green | 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>BASIS OF RESPONSE</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. 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 Draft Local Views SPD responses schedule]</p> | <p>The respondent's comments on the SPD supported the continuation of adopted views and proposed new views in the SPD, but comment sought clarity including on the mapping and viewing locations and view management of a number of views (C5.4 Richmond Road, East Twickenham; F1.2 Richmond Green; F1.6 Asgill House; F2.1 Church of St Matthias; F1.1 Richmond Terrace, Richmond Hill; and F1.3 Richmond Bridge (north-east)). A number of new townscape, linear and landscape views were proposed – Richmond Little Green, Gatehouse to Old Palace Richmond Green, Old Palace Lane, Twickenham Road Footbridge to St Matthias Church Spire, Richmond Hill towards Richmond Town and from Richmond Park Pembroke Lodge towards Richmond Town.</p> <p>The Council informally considered the SPD responses, although these new views were not proposed for designation, with existing designations and views already covering these locations, Detailed issues on viewing locations and view management can be considered when the SPD is taken forward for adoption.</p> | |
| 443 | Tim Catchpole, Mortlake with East Sheen Society | Policy 31 Views and vistas | | | <p>Policy 31. Views and vistas [See previous comments in the Draft Local Views SPD responses schedule]</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> | <p>The respondent's comments on the SPD stated the document is well crafted, but raised general comments seeking clarification on the adopted Policies Map, comments on the boroughwide map, and raising concern about riverside views and the relationship with Hounslow and Kingston. Noting a number of views within the historic parish, would like to see a number of additional views included – a number around the Stag Brewery site, a view along Lower Richmond Road, across Jubilee Gardens in Mortlake, along Church Path to St Mary's Church in Mortlake, from Richmond Park to the Alton Estate, and from plateau east of White Lodge.</p> | |


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| | | | | | | | | | London's SPG on London's World Heritage Sites. At this stage it is noted that the respondent may be seeking more stringent requirements for submission of Heritage Impact Assessments with planning applications as part of the policy on Kew WHS. Considering this further during the Examination process will provide the opportunity to balance requests of statutory bodies with aspirations of RBG Kew for greater flexibility in policy 30 (see comment 448). |
| 446 | Tim Brennan, Historic England | Policy 32 Royal Botanic Gardens, Kew World Heritage Site | | | | Policy 32 – Royal Botanic Gardens, Kew World Heritage Site 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. We would also reiterate our previous comment [See the Council's Statement of Consultation (June 2023) 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 application – further details can be found at World Heritage Centre - Guidance and Toolkit for Impact Assessments in a World Heritage Context 2022 (unesco.org) . | | | An additional modification could be considered as part of further work during the Examination process. See the Statement of Common Ground with Historic England. The Council's response to the respondent's comment on the Regulation 18 Plan (comment 897) was as follows: <i>The Outstanding Universal Value of the site, its integrity, authenticity and significance is already covered separately under the second bullet point of the policy and isn't necessary to repeat in the first part of the policy.</i> <i>The requirement for a Heritage Impact Assessment within or around the World Heritage Site will be proportionate to the scale and location of the development being proposed and is considered on a case-by-case basis (for example it may not be applicable to certain householder applications within the buffer zone). It is explained in paragraph 20.49 that the Council will follow the ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, which continues the approach in the existing policy LP 6.</i> The Council has sought to strike a balance in the policy between the responses from statutory bodies regarding the wording of the policy and the comments from RBG Kew about allowing enough flexibility, particularly in relation to temporary events and exhibitions. There is regular engagement through the WHS Steering Group (twice yearly) to update on Council planning and heritage matters providing ongoing liaison with statutory bodies and stakeholders. There may however be scope for further discussion during the Examination process. |


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| 447 | Duncan McKane, London Borough of Hounslow | Policy 32 Royal Botanic Gardens, Kew World Heritage Site | | | | | Heritage and Conservation 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. 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. | | Comment noted. |
| 448 | Henry Brown (The Planning Lab), Royal Botanic Gardens Kew | Policy 32 Royal Botanic Gardens, Kew World Heritage Site | Yes | No | Yes | Effective; Consistent with national policy | Policy 32: Royal Botanic Gardens, Kew World Heritage Site [See the Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 898 in relation to Policy 32] 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. For this reason, RBGK reiterates its request that the following additional point is added under Part A of this policy, as follows: '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.' 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. 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: '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.' | See Section 6, above. | Comment noted. Respondent's point 4: The Council's response to the respondent's comment on the Regulation 18 Plan (comment 898) was as follows: <i>Council considers most appropriate approach to considering exceptions to the policy (including on temporary events and exhibitions) continues to be on a case-by-case basis. As such no change to the wording of the policy is suggested.</i> Respondent's point 5: The proposed amendment is not considered to be appropriate due to other balancing considerations that need to be considered. Temporary events are requirements of RBG Kew and not the World Heritage Site. It is considered the planning process already allows for the balancing of different requirements on a case-by-case basis. |
| - | | | | | | | Policy 33 Archaeology – no comments received | | |
| - | | | | | | | Increasing biodiversity and the quality of our green and blue spaces, and greening the borough | | |
| 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 | | Noted. The Plan is considered to take to protect the range of spaces making up the green and blue infrastructure network, recognising the multi-functional benefits. Udney Park Playing Fields has already been designated as a Local Green Space of particular importance to the local community. |
| 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. | | Noted. The Council considers there is a robust approach to protecting open land and nature conservation in the borough, based on up to date and robust evidence. |
| 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. | | See response to comment 481 in respect of the All London Green Grid. 5.152 refers to opportunities, and these are taken when opportunities arise to improve access, landscaping etc. such as in recent years |

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| | | | | | | | | | | | | through Twickenham Station and Richmond upon Thames College. This can be sought where relevant through the policy framework in the Plan, particularly Policies 37 and 40. | |
| 452 | Peter Thompson, National Physical Laboratory (NPL) | Increasing biodiversity and the quality of our green and blue spaces, and greening the borough | Yes | Yes | Yes | | | | | | | The importance to NPL of Policy 21 Increasing biodiversity and the quality of our green and blue spaces, and greening the borough 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 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. | Noted, and beyond the Local Plan there are other corporate initiatives publicised by the Council (for example see the press release ' Richmond named climate action leader by global environmental impact non-profit for second year '), |
| 453 | Rachel Holmes, Environment Agency | Increasing biodiversity and the quality of our green and blue spaces, and greening the borough | | | | | | | | | | <p>2. Biodiversity</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.</p> <p>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> | <p>Comments noted. These are the EA's general biodiversity comments and noted that recommendations are not raising issues of soundness.</p> <p>The Plan as a whole is considered to take a comprehensive approach to the blue and green infrastructure network to enhance biodiversity, in Policy 34 and elsewhere, promoting connectivity.</p> <p>See response to comment 488 regarding the river metric.</p> <p>The references to buffer zones in Policies 8 and 40 are considered sufficient. These along with Policy 39 are considered to provide an appropriate policy framework. Paragraph 21.90 in the Plan refers to fish movement and is considered sufficient detail for the Plan.</p> <p>Reference to dark environments is at paragraphs 21.68, 21.69 and 21.115 which along with Policy 43 provides a framework to assess the impact of lighting. See also response to comment 501.</p> <p>Requirements for SuDs are set out in Policy 8.</p> <p>A new Biodiversity SPD is anticipated once the Local Plan has been adopted, which can further explore details for aquatic habitats such as those raised in this comment.</p> |
| - | Michael Atkins, Port of London Authority (PLA) | Local Plan | Yes | Yes | Yes | | | | | | | [See comment 5 in relation to proposed amendments to Policies 39, 40 and 41] | - |
| - | | | | | | | | | | | | Policy 34 Green and Blue Infrastructure (Strategic Policy) | |
| 454 | Rachel Holmes, Environment Agency | 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. | Support noted. |


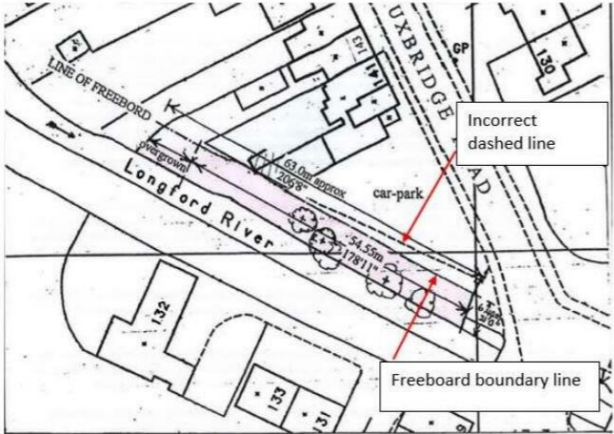
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| 455 | Mark Jopling, Udney Park Playing Fields Trust | Policy 34 Green and Blue Infrastructure (Strategic Policy) | | | | Green and Blue Infrastructure At the 2020 Public Inquiry the Council Biodiversity Officer recognised the importance of Udney 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. | | Noted. |
| 456 | Martha Bailey, London Historic Parks and Gardens Trust | Policy 34 Green and Blue Infrastructure (Strategic Policy) | | | | 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. 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: 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. 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. 3. Enhance the existing blue and green infrastructure network, including open spaces and green corridors, providing habitats for biodiversity to flourish and expand. 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. 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. 6. Expect development to incorporate and maintain appropriate elements of green infrastructure which make a positive contribution to the wider network of open spaces. 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. 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. 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. | Within point B. please provide an additional point - 'Seek opportunities to create new, green open space.' | It is considered that the existing policy framework provides a robust approach to enhancing green and blue infrastructure including Policies 34 & 37. Policy 34, Part B Criterion 5 in particular seeks to increase provision in and around development sites. It is noted that Arup's assessment, the Green Belt, MOL, LGS and OOLTI Review 2021 reviewed the open space designations in the borough and identified locations where further designations should be considered by the Council and have subsequently led to new areas of Local Green Space and of Other Land of Townscape Importance being proposed in the emerging Local Plan. |
| 457 | Katherine Drew, The Royal Parks | Policy 34 Green and Blue Infrastructure (Strategic Policy) – comments specific to biodiversity and the Royal Parks' Environmental Designation s) | | | | 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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 909 in relation to the impact on green infrastructure] | | The Council's response to the respondent's comment on the Regulation 18 Plan (comment 909) was as follows: <i>No change necessary. Policy 37, part B states that "the provision of new open spaces and actively encouraging new users and visitors to utilise these spaces will alleviate recreational pressures on sites designated for biodiversity", therefore this issue has been accounted for in Local Plan policy.</i> |
| - | | | | | | Policy 35 Green Belt, Metropolitan Open Land and Local Green Space | | |
| 458 | Mark Jopling, Udney Park Playing Fields Trust | Policy 35 - Local Green Space (LGS), Paragraph 21.8 | | | | Local Green Space (LGS) 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. | | Support noted |
| 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. | | Noted. |

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| | | | | | | | | | An Additional Modification could be considered – add following footnote at bottom of page (referred to in first sentence of paragraph 21.12) 5 “The land at Twickenham and Fulwell golf courses is held under “The Green Belt (London and Home Counties) Act, 1938. An Act to make provision for the preservation from industrial or building development of areas of land in and around the administrative county of London.” Under this Act owners are required to request permission from the Secretary of State to build on or dispose of this land. This requirement is separate from and in addition to any requirements for planning permission. Most of this land is protected in the Borough’s Local Plan and London Plan by its designation as Metropolitan Open Land under Policy 35 and Policy G3 respectively. However, it is not covered by any planning policy Green Belt designation in the terms described by the NPPF, London Plan and Local Plan.” Footnote omitted in error. |
| 460 | John Sadler, CPRE London | 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 boundaries¹. The ambitious commitments to combat climate change are laudable² and we also support the proposed designation of six new sites as Local Green Space.³ 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>¹ https://www.richmond.gov.uk/media/fomccpcf/publication_local_plan_low_resolution.pdf page 296 section 21.14 ² Ibid page 182-213 ³ Ibid page 296-7 section 21.18</p> | | Noted | |
| 461 | John Sadler, CPRE London | Policy 35 Green Belt, Metropolitan Open Land and Local Green Space | | No | Justified; Effective; Consistent with national policy | <ul style="list-style-type: none"> • 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. • 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. • 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. • 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. | | <p>The Council considers that this policy provides a very robust approach to protect land with open space designations and is appropriate and in line with the wording on Green Belts and MOL set out in the NPPF and London Plan.</p> <p>The Regulation 19 Plan (Part B of policy 35) has been amended to refer directly to national planning policy tests.</p> <p>The GLA support policy 35 as drafted and have not raised conformity issues in relation to the policy itself or changes to designations included in the Regulation 19 Plan.</p> <p>The entirety of Heathfield Recreation Ground is designated as Metropolitan Open Land as shown in the following map.</p> | |

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| | | | | | | <p>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> | | <p>The Council does not intend to make changes to land designated as Green Belt. This parcel performs an important role in maintaining the gap between Hampton, Sunbury and Molesey. Green Belt designation is intended to be permanent which can only be released if exceptional circumstances can be demonstrated at both strategic and site levels.</p> <p>It is considered that planning proposals on this site can be considered through the development management process, which allows the Council to consider the specifics of individual proposals.</p> |
| 463 | David Taylor | Policy 35 Green Belt, Metropolitan Open Land and Local Green Space | No | No | | <p>Land adjacent to Sunnyside reservoir, Hampton TW16 5PR Land Registry Title Plan attached [See Appendix 14]</p> <ul style="list-style-type: none"> This parcel of land does not meet the NPPF criteria to justify its current designation as Green Belt. This statement is without prejudice to my Judicial Review claim that this land has never been lawfully designated as Green Belt. It is unsound to retain the land within the Green Belt and it should be removed. | <ul style="list-style-type: none"> The GB designation of this patch of land should be removed from the Local Plan Proposals Map A note should be added to Policy ENV4 that <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> | <p>Representations regarding the status of the land, i.e. whether it is or is not Green Belt, and its removal from Green Belt, have been made previously including at the 2017 Local Plan Examination in Public. Note officers understand the application to apply for judicial review was refused in October 2023.</p> <p>The site sits within General Area 5 (GA5) of Arup's assessment. GA5 forms the entire gap between Hampton Village, Molesey and Sunbury-on-Thames and provides a physical and visual buffer to the merging of settlements. It performed weakly on one criterion as it has an urban character, but overall GA5 was assessed as strongly performing against NPPF purposes and no weakly performing sub-areas were identified for further assessment.</p> <p>The Council does not intend to make changes to the Green Belt.</p> <p>It is noted that the land is also designated as within the Thames Policy Area.</p> |
| 464 | Olivia Russell (CBRE), Rugby | Policy 35 Green Belt, Metropolitan Open Land and | Yes | No | Yes | <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 is does not respond to conclusions and recommendations within the relevant evidence base document (Open Land Review 2021 and MOL Annex Report 2021).</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. "Proposed Changes to the Policies Map</p> | <p>The Council have considered the strip of land outlined in the comment 464, however maintains its position that due to the balance of planning factors the MOL designation should not be removed and</p> |

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| | <p>Football Union (RFU)</p> | <p>Local Green Space</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). 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.</p> <p>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.</p> <p>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>Metropolitan Open Land</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 Figure 2 below and further relevant extracts are provided within Appendix 1 [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"> 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; and 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. <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 Appendix 2 [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</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> <ol style="list-style-type: none"> 1. Carpark for Sainsburys, Uxbridge Road, Hampton (see Site Allocation 5) 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. 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." 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." | <p>the requirements as set out currently within Site Allocation 13 in relation to MOL should be retained.</p> <p>Arup's assessment makes clear the limitations of their report, that it is within the Council's power to make decisions on the designation of open space taking into account a number of factors including the Local Plan's strategy, ability to meet housing need and the wider evidence base.</p> <p>It is noted that the land is designated wholly as an area which is public open space deficient and partly as a Site of Importance for Nature Conservation (Duke of Northumberland's River).</p> <p>The status of the land could be improved.</p> |
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| | | | | | <p>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: <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 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.”</i></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. 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> <i>1. Carpark for Sainsburys, Uxbridge Road, Hampton (see Site Allocation 5)</i> <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> <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> <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></p> | | |
| 465 | Jonathan Blathwayt, GLA on behalf of Mayor of London | Green Belt and Metropolitan Open Land | Yes | 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.</p> <p>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> | | Support noted. |
| 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> | <p>Outdoor sport is recognised as an appropriate use in Policy 35 Part B. It is considered more appropriate for specific proposals for ancillary sport and teaching facilities to be considered through the planning application process acknowledging paragraph 149 (b) of the NPPF.</p> <p>A Playing Pitch and Outdoor Sport Assessment was published in 2023, accompanied by a Playing Pitch and Outdoor Sports Strategy (2023), which assessed need and demand for playing pitches and outdoor sport which will inform decisions affecting provision.</p> |

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| 467 | Rachel Holmes, Environment Agency | Policy 35 Green Belt, Metropolitan Open Land and Local Green Space | | | | | 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. | | Noted. The Plan as a whole supports green and blue infrastructure and urban greening. |
| 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 Designation Boundary) | Yes | No | Yes | 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>Regulation 19 Plan Consultation Representations in relation to Metropolitan Open Land Boundary at 141 Uxbridge Road Hampton TW12 1BL</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>Figure 1: Extract from Regulation 19 Policies map showing MOL boundary</p> <p>The strip of land adjoining the Longford River to the south west of our client's property, is subject to a Royal Parks Agency freebord 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 freebord 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 freebord map at Figure 2.</p>  <p>Figure 2: Extract from Freebord License Map</p> <p>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.</p> <p>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.</p> | Please see attached letter [previous column] detailing requested change to correct error on Metropolitan Open Land Boundary. | <p>The Council does not intend to adjust the MOL boundary at this site. It is not a part of Parcel 1 recommended for review identified by the Green Belt, MOL, LGS and OOLTI Review 2021 & 2023. The assessment concludes that overall the parcel fulfils its role for MOL purposes.</p> <p>Arup's assessment also notes "As the southern part of the parcel is a fairly large green space along the Longford River blue corridor, it contributes to a local ecological and green infrastructure corridor along the local river."</p> <p>It is noted that the OSNI/SINC boundary aligns with the MOL boundary at this point.</p> |

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

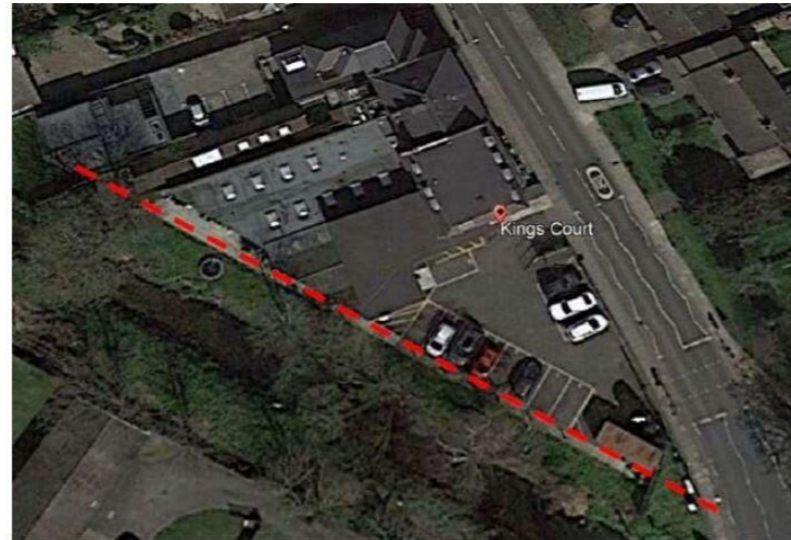


Figure 3 – Google Maps Aerial View

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.

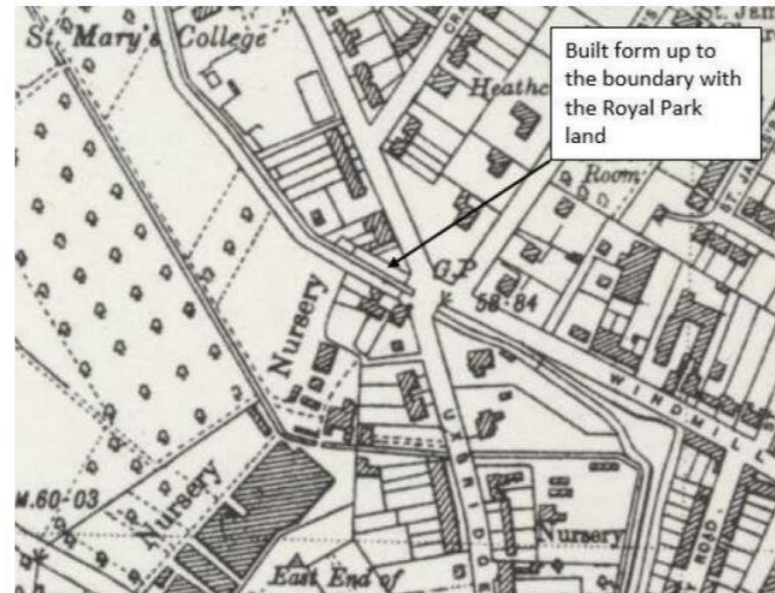





Figure 4 – Extract from Middlesex Sheet XXV.NE

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.

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| | | | | | | <p>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.</p> <p>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. 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) | N | N | Y | <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 Council does not intend to adjust the MOL boundary at this site. It is not an area recommended for review identified by the Green Belt, MOL, LGS and OOLTI Review 2021 & 2023.</p> <p>The assessment concludes that the majority of the parcel (45) fulfils its role for MOL purposes, meeting criteria 1.</p> <p>It is noted that MOL does not need to be in public ownership or be publicly accessible. There are other instances where MOL designation partly covers private residential gardens.</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.



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:

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| LB Enfield | Metropolitan Open Land & Green Chain Associated Open Space Review | Published 2013 | A high-level review of MOL and Green Chain associated Open Space (GCOS). It reviewed the MOL boundaries, using 'tidy up' boundaries that needed adjustment due to land use changes since the previous iteration or past cartographic inconsistencies (due to the previous study being carried out before the invention of GIS). It was recommended that the borders 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 Open Space site was recommended to be designated as MOL. |
| LB Waltham Forest | 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 character 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 focussed 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 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 139 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.



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

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| | | | | | | <p>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.</p> <p>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 (detailed assessment) (2021) Parcel Number 31 - Twickenham, Strawberry Hill & St Margarets pp. 101-130 | N o | N o | N o | <p>Positively Prepared ; Justified; Effective; Consistent with national policy</p> <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"> 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. 2 The proposed MOL policies and the retention of The Boathouse within the MOL. 3 The impact of proposed MOL policies on the delivery of identified housing targets. <p>Full details of our representations have been set out below.</p> <p>BACKGROUND</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). 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>THE ACCURACY AND VALIDITY OF THE EVIDENCE BASE</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</p> | <p>Arup's assessment, the Green Belt, MOL, LGS and OOLTI Review 2021, has been produced using accepted methodology which was itself consulted on.</p> <p>It is proposed to update the related Errata sheet to reflect the fact that the building (The Boathouse) houses 3 dwellings.</p> <p>Specifically Parcel 31 in which the Boathouse sits, was considered to fulfil its role for MOL purposes, meeting criteria 1, 2, 3 and 4.</p> <p>In order to make changes to MOL a robust case must be made which is fully evidenced and justified.</p> <p>The contribution that the small scale nature of the site can make to meeting housing need is considered negligible and in fact as proposed will not increase the number of dwellings on site (no net gain).</p> |

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| | | | | | <p>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 & 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 one dwelling 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.” [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>MOL POLICIES AND RETENTION OF THE BOATHOUSE WITHIN THE MOL</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> <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</p> | |
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| | | | | | | <p>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>HOUSING DELIVERY IN RICHMOND AND THE RESIDENTIAL USE OF THE BOATHOUSE</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.</p> <p>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>FLOODING AND DESIGN</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> <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).</p> | |
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| | | | | | | <p>In light of this, the current application) proposes to raise the building line by one metre to address this requirement.</p> <p>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>SUMMARY AND CONCLUSIONS</p> <p>In summary, we have covered the following:</p> <p>1 The evidence base and the validity: 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>2 Approach to the MOL and The Boathouse: 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>3 Restrictive Policy and the impact on housing delivery: 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>4 Flooding and Design: 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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| Test of Soundness | Assessment | | | | | | | | | | | | | | | | |
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| 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. | | | | | | | | | | | | | | | | |
| 471 | John Sadler, CPRE London | MOL De-designations - | No | Justified | 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 | The Green Belt, MOL, LGS and OOLTI Review 2021 & 2023 identified this area as one where the MOL designation could be | | | | | | | | | | | |

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| | | Paragraph 21.14 | | | | 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 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. | | reviewed. The Council has decided to remove the land from these narrow parcels (48 & 49) on Hampton Court Road as both performed weakly/ weak moderate against MOL criteria. It is noted that both parcels (48 & 49) are located wholly within conservation areas, with the majority of the eastern parcel is also within the curtilage (front gardens) of locally listed buildings (BTMs). The parcels are also within the Thames Policy Area and an Archaeological Priority Zone. Most permitted development rights are not affected by the MOL designation. |
| 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</p> <p>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.</p> <p>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>1.0 THE SITE Land to the North of Chertsey Road forming a garden for 52 Orchard Road, Twickenham, Middlesex, TW1 1LY.</p> <p>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.</p> <p>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 this area in which the River Crane runs through gardens and none has an MOL designation extending beyond the riverbank.</p> <p>2.0 LEGAL COMPLIANCE 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>3.0 CONFORMITY WITH THE LONDON PLAN</p> <p>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:</p> <ol style="list-style-type: none"> 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. <p>This garden meets none of the above criteria let alone two. By contrast the separately designated river bank does meet the criteria.</p> <p>3.2 Policy G3 further states:</p> <p>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</p> | <p>ALTERNATIVE APPROACH 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>The removal of MOL from the land in question has been considered previously at several Plan inquiries/examinations where in each case the Inspector/Examiner has agreed with the Council that the MOL designation is warranted.</p> <p>The Council does not intend to adjust the MOL boundary at this site. It is not an area recommended for review identified by the Green Belt, MOL, LGS and OOLTI Review 2021 & 2023. The assessment concludes that the majority of the parcel fulfils its role for MOL purposes, meeting criteria 1 & 3.</p> <p>The parcel (32) directly connects to a larger green space to the west, allotments designated as MOL within the Borough of Hounslow. Together, these green spaces help to separate the urban areas of St Margarets and Twickenham, and therefore contributes to the physical structure of London.</p> <p>Over half the river portion of the parcel is designated as a SINC (metropolitan), forming an important tributary to the River Thames likely to function as a wildlife corridor. The remainder of the river portion of the parcel is designated as a SINC (borough).</p> <p>It is a small part of the important River Crane green and blue corridor, which connects directly to the River Thames.</p> |

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| | | | | | <p>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.</p> <p>This further demonstrates that the garden in question does not and cannot fulfil any of these benefits and does not warrant the MOL status.</p> <p>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.</p> <p>This would be impossible to meet given that this is a private garden with no public access.</p> <p>4. CONFORMITY WITH NPPF</p> <p>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.</p> <p>None of these purposes apply to this private garden.</p> <p>5. CONFORMITY WITH DRAFT Local PLAN</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. Page 290 of the Draft Local Plan states that: 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. 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: Metropolitan Open Land (MOL) is unique to London and protects strategically important open spaces. 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>6. ARUP METROPOLITAN OPEN LAND REVIEW</p> <p>6.1 Page 298 paragraph 21.22 of the Publication Local Plan states that: 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: 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</p> | |
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| | | | | | | <p>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>7. PAST PLANNING DECISIONS</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>8. SOUNDNESS/LEGALITY</p> <p>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.</p> | |
| 473 | Peter Willan, Paul Velluet and Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green) | Policy 35 Green Belt, Metropolitan Open Land and Local Green Space | | | | <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: ... 929...</p> <p>[See the Council's Statement of Consultation (June 2023) 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]</p> | The Council's response to the respondent's comment on the Regulation 18 Plan (comment 929) in relation to the MOL review of Richmond Green, Riverside North of Richmond Bridge and Riverside South of Richmond Bridge, outlined Arup's review of these sites against the relevant criteria, and no changes were considered necessary. |
| 474 | Peter Willan and Paul Velluet, Old Deer Park Working Group | Policy 35 Green Belt, Metropolitan Open Land and Local Green Space | | | | <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: 930...</p> <p>[See the Council's Statement of Consultation (June 2023) 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]</p> | The Council's response to the respondent's comment on the Regulation 18 Plan (comment 930) in relation to the MOL at Old Deer Park, outlined Arup's review of these sites against the relevant criteria. The Errata Report (January 2023) MOL Review Annex Report included amends to the assessment of parcel 26. No further changes considered necessary. |
| - | Saffron Frost (Savills), Melliss Ave Devco Limited (in | | | | | [See comment 282 in relation to Policy 35 and Site Allocation 32] | See response to comment 282. |

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| | Administration) c/o RSM | | | | | | | | |
| - | | | | | | | Policy 36 Other Open Land of Townscape Importance (OOLTI) | | |
| 475 | Mark Jopling, Udney Park Playing Fields Trust | Policy 36 Other Open Land of Townscape Importance (OOLTI) | | | | | Other Open Land of Townscape Importance (OOLTI) 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. | | Support noted. Maintenance requirements are considered beyond the scope of the Local Plan. |
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| 476 | John Sadler, CPRE London | 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'. | | Outdoor open space, particularly green space, is important to residents and is recognised as such by the Council. The Plan contains policies which will prioritise the protection and, where appropriate, enhancement of existing open space in the Borough. New developments will be expected to provide sufficient private open space for residents, to be made publicly accessible in areas of open space deficiency and improve access to public open space through Policy 1. Policy 38 will ensure developments contribute to urban greening and converting grey space into green infrastructure. There is significant pressure for land in the Borough to deliver other, equally as important priorities such as housing, employment and social infrastructure. It may not be feasible to increase the amount of green space but the policy does still support this where appropriate and where there is an open space deficiency as identified by the Council's Open Space Report. See also responses to comments from Royal Parks and comment 38 regarding Richmond Park and the HRA. See also response to comment 461 regarding grey space. |
| 477 | Martha Bailey, London Historic Parks and Gardens Trust | 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. Impacts on existing provision and requiring new provision 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: Public Open Space 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 | [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 <i>facilities</i> ... track change suggests'] open space, green wherever possible, [Regarding D.3 'where reference is to provide on-site <i>open space</i> ...track change suggests] green open space | As identified by the respondent, there are parts of the Borough that experience open space deficiency and it would be unlikely that an application to build on what provision is in these areas would be successful. However, the policy gives suitable flexibility for an application to come forward in area where there is determined to be a surplus of open space and is to be replaced with something that provides a greater benefit. It is the Council's position that the policy would not open the door to inappropriate development on open space. "Facilities" in D.1 refers to open space. Along with comments made regarding D.3, the Plan's policies and incoming BNG requirements will mean that green open |

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| | | | | | | <p>limited access to such facilities, publicly accessible facilities will be expected on-site to mitigate the impacts of the new development on existing provision.</p> <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> | | <p>space will likely be required in all instances. The current wording provides suitable flexibility where it may be required and left to the professional judgement of the decision maker.</p> |
| 478 | Jo Edwards, Sport England | 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 or appropriate. 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> | <p>LP37 D. 8. Where on-site provision of play space or new playing fields and ancillary facilities is not feasible, or practicable or appropriate, 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.</p> | <p>Support noted. The terminology 'not feasible or practicable' is carried forward from the adopted Local Plan, so that the onus is on a developer to demonstrate why on-site provision is not feasible or practicable. It is intended to ensure on-site provision is considered first, due to the benefits of integrating in new development. As set out in paragraph 21.36 of the Plan the policy wording already allows for a site-specific assessment to be made, therefore no further amendment is considered necessary.</p> |
| 479 | Lucy Hale (Gerald Eve), St Mary's University | Policy 37 Public Open Space, Play, Sport and Recreation | | | | <p>Draft Sports Policy 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> | | <p>Support noted.</p> |
| 480 | Tim Catchpole, Mortlake with East Sheen Society | Policy 37 Public Open Space, Play, Sport and Recreation | | | | <p>Theme: Increasing biodiversity and the quality of our green and blue spaces, and greening the borough (Policies 34-43) Policy 37. Public open space, play, sport and recreation 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> | | <p>The Local Plan takes stock of the assets within the Borough as this is what the Council has jurisdiction over, although cross-boundary issue movements are recognised.</p> <p>The Council's Playing Pitch and Outdoor Sport Strategy was adopted at Environment Committee in November 2023 and is now published on the Council's website, as well as coming into force as an evidence base for determining planning applications coming forward. The work on the Strategy has been ongoing in tandem with the Local Plan work and it has fed into the development of Policy 37, including more detail on Alternative Grass Pitches (AGPs) and Community Use Agreements (CUAs). As there will be regular Monitoring of the Strategy it is intended to be regularly updated, so the Policy is not too prescriptive to be in line with it and rather supports the implementation of the Strategy and any future updates.</p> <p>An Additional Modification to paragraph 21.27 could be considered to reference the 2023 PPOSS.</p> |
| 481 | Jon Rowles | Policy 37 Public Open | | | | <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</p> | | <p>Classifications follow the Fields in Trust guidance which provides accessibility</p> |

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| | | Space, Play, Sport and Recreation (Open Space Assessment) | | | | | 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. | | benchmarks for different classifications of open space as identified in the report which ensures open space is closer to homes than the London SPG's open space categories. This produces more accurate open space deficiency mapping. As a point of information, Murray Park is classified under Parks and Gardens and not Amenity Green Space in the report. The report is a subjective, qualitative assessment and a snapshot in time intended to give a general overview of quality. The report is not accompanied by additional guidance. |
| 482 | Mark Jopling, Udney Park Playing Fields Trust | Playing Pitch Strategy | | | | | Playing Pitch Strategy 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. | | The Council's Playing Pitch and Outdoor Sport Strategy was adopted at Environment Committee in November 2023 and is now published on the Council's website, as well as coming into force as an evidence base for determining planning applications coming forward. The work on the Strategy has been ongoing in tandem with the Local Plan work and it has fed into the development of Policy 37, including more detail on Alternative Grass Pitches (AGPs) and Community Use Agreements (CUAs). As there will be regular Monitoring of the Strategy it is intended to be regularly updated, so the Policy is not too prescriptive to be in line with it and rather supports the implementation of the Strategy and any future updates. |
| - | | | | | | | Policy 38 Urban Greening | | |
| 483 | Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer | Policy 38 Urban Greening | N | N | N | 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 Council's Statement of Consultation (June 2023) 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.] | | The Council's response to the respondent's comment on the Regulation 18 Plan (comment 963) was that the requirement of 70% is a reasonable and long-standing policy requirement, considered appropriate to contribute to maintaining and supporting a green infrastructure network. |
| - | | | | | | | Policy 39 Biodiversity and Geodiversity | | |
| 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. | | Comments noted, however the justification for the approach is detailed in the Background Topic Paper on Biodiversity. |
| 485 | Natasha Styles (The Planning Bureau Limited), McCarthy & Stone Retirement Lifestyles Ltd | Policy 39 Biodiversity and Geodiversity | | N | | 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 | Recommendation: Amend Policy 39 point 5 as follows: 5. requiring the following development proposals to provide a measurable 10% net gain for biodiversity, in line with the latest available version of the DEFRA metric: | Comments noted, however the justification for the approach is detailed in the Background Topic Paper on Biodiversity. |

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| | | | | | | | 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%. | | |
| 486 | Summer Wong (RPS), Notting Hill Genesis | Policy 39 Biodiversity and Geodiversity (p.309-310) | N | N | N | Positively Prepared ; Justified; Effective; Consistent with national policy | Policy 39 Biodiversity and Geodiversity (p.309-310) 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. | Recommended Amendment 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. | Comments noted, however the justification for the approach is detailed in the Background Topic Paper on Biodiversity. |
| 487 | Anna Stott (WSP), Sainsburys Supermarkets Ltd | Policy 39 Biodiversity and Geodiversity | | N | | 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"> Policy 39 should be amended to refer to BNG of 10% in accordance with the Environment Act 2021. | Comments noted, however the justification for the approach is detailed in the Background Topic Paper on Biodiversity. |
| 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. | | An Additional Modification could be considered to add a paragraph after the supporting text at paragraph 21.92 of Policy 40. See the Statement of Common Ground with the Environment Agency. |
| 489 | Emma Penson (DWD), Dukes Education Group and Radnor House School | Policy 39 Biodiversity and Geodiversity | N | N | N | 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. | | Comments noted, however the justification for the approach is detailed in the Background Topic Paper on Biodiversity. |
| 490 | Louise Cole | Policy 39 Biodiversity and Geodiversity, Paragraph 21.65 | Y | Y | Y | es es es | 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 '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. | | Support noted. |
| 491 | Mike Priaux, Swifts Local Network: Swifts & Planning Group | Policy 39 Biodiversity and Geodiversity, Paragraph 21.65 | Y | Y | Y | es es es | Supportive of this paragraph, especially reference to one nest brick per dwelling on average, which implements British Standard BS 42021:2022. | Not applicable. | Support noted. |
| 492 | David Wilson, Thames Water | Policy 39 Biodiversity and Geodiversity, M085 | | N | | Consistent with national policy | Policy 39 Biodiversity - M085 Hampton Water Treatment Works and Reservoirs Nature Conservation Designation 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 | Remove Metropolitan Grade wildlife designation from Hampton WTW. | Resubmission of comments to the Regulation 18 Local Plan consultation noted. The Council’s response to the respondent’s comment on the Regulation 18 Plan (comment 1132) was that the |

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| | | Hampton Water Treatment Works and Reservoirs Nature Conservation Designation | | | | | Metropolitan Importance and amalgamated with Stain Hill and Sunnyside Reservoirs to create 'Hampton Water Treatment Works and Reservoirs' Site of Metropolitan Importance. 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. 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. 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. We therefore object to this proposal to upgrade the nature designation. | | principal use for the site and the proposed SINC designation are not considered incompatible, |
| - | | | | | | | Policy 40 Rivers and River Corridors | | |
| 493 | Gary Backler, Friends of the River Crane Environment (FORCE) | 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. | There are multiple direct references to the River Crane in the Plan within relevant Site Allocations, Place-based Strategies and in the supporting text to Policy 40 at paragraph 21.88. It is considered that the requirements for development alongside and adjacent to the River Crane are sufficiently covered in Part D of the Policy as this explicitly applies to all the borough's river corridors. Parts B and C and paragraphs 21.91 and 21.92 are designed to comply with the London Plan approach on the river Thames Policy Area. It is therefore not considered necessary to amend the Plan. See also the Council's response to the respondent's comments on the Regulation 18 Plan (comment 956). In relation to dark corridors, the Council's response to the respondent's comments on the Regulation 18 Plan (comment 1004) was that identification of any dark corridors is not considered practicable, but references were added to the Plan to refer to the importance of dark environments and no further amendments are considered necessary. |
| 494 | Kay Collins (Solve Planning), Port Hampton Estates Limited | Policy 40 Rivers and River Corridors | | | | | River-Related Uses 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. Policy 40. Rivers and river corridors ... <i>Riverside uses, including river-dependent and river-related uses</i> <i>F. The Council will resist the loss of existing river-dependent and riverrelated 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> <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> | | General support is noted. The Council's response to the respondent's comments on the Regulation 18 Plan (comment 987) was that it would not be appropriate to refer to site specific circumstance or conditions as the onus will be on the applicant to demonstrate and set out why one or more of the criteria cannot be met. |

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| | | | | | <p>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</p> <p>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;</p> <p>4. ensuring that any proposed residential uses, where appropriate, along the river are compatible with the operation of the established river-related and river-dependent uses;</p> <p>5. requiring setting back development from river banks and existing flood defences along the River Thames</p> <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, Environment Agency | Policy 40 Rivers and River Corridors | | | <p>Riverside Strategy Approach</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>Policy 40 – Rivers and River Corridors</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) & 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:</p> <p>"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"> • 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). • Development proposals that include culverting and hard bank protection, including sheet piling, will not be permitted. • Buffer zones should be planted with locally native species of UK genetic provenance and free from any formal landscaping, including gardens. • 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. • 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. • 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. • 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." | | <p>Support noted.</p> <p>The Council considers the references to setback at paragraph 21.89 and to culverted watercourses at 21.96 is adequate and is covered sufficiently, when read in conjunction with Policy 8.</p> <p>Note the comment concerning Landscape and Ecological Management Plans, however, consider adding this requirement is unnecessary as this would be picked up within a Landscape Scheme required elsewhere in the Plan.</p> <p>The Council note the comments on adding in references to good ecological status/potential. Details are set out in Policy 9 on water quality with details at paragraph 16.95. Note the suggested amendments proposed and an Additional Modification could be considered during the Examination, although seek further clarity on where this amendment is suggested. See the Statement of Common Ground with the Environment Agency.</p> <p>Note comments seeking a link to BNG. Although this requirement is covered in Policy 39, and paragraph 21.78 also mentions the potential for a BNG SPD, which would be able to cover this in more detail, an Additional Modification to cross-reference could be considered. See response to comment 488.</p> <p>Support noted.</p> |

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| | | | | | | 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. 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. 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. We are also pleased to see that you have taken on board our comments in relation to fish passage in paragraph 21.90. | | |
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| 496 | Suzanne Parkes, Elmbridge Borough Council | Policy 41 Moorings and Floating Structures | | | | Policy 41 – Mooring and Floating Structures 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. 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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1000 in relation to Policy 41] 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. 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. | | Comment noted. |
| 497 | Rachel Holmes, Environment Agency | 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. | | Comment noted regarding Council’s response to Regulation 18 consultation (comment 997) regarding resisting new houseboats including extensions to existing houseboats. The Council considers that the policy provides the framework to protect the river and its biodiversity, against which proposals can then be assessed through individual planning applications. |
| - | | | | | | Policy 42 Trees, Woodland and Landscape | | |
| 498 | John Sadler, CPRE London | 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. | | Comments noted. The Council’s tree policy sets out the Council’s approach to protecting and enhancing the borough’s treescape. The policy also commits to undertaking tree planting surveys to identify new tree planting locations, whilst the paragraph 21.114 states that the Council intend to publish an SPD on Trees which will include guidance on planting. |
| 499 | Martha Bailey, London Historic Parks and Gardens Trust | 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: Trees and Woodlands 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; | 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> | Comments noted. Policy 42 B 10 requires ‘landscape design and materials to be of high quality and compatible with the surrounding landscape and character’ and Policy 42 B 11 requires ‘planting, including new trees, shrubs and other significant vegetation where appropriate’. The Council intend to publish an SPD on Trees which will include guidance on planting, as set out in paragraph 21.114. |

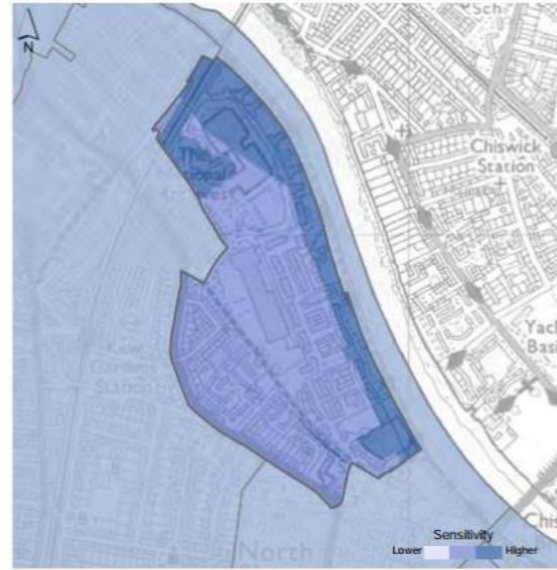
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| | | | | | | <p>2. resist development that would result in the loss or deterioration of irreplaceable habitat such as historic parkland;</p> <p>3. require that site design or layout ensures a harmonious relationship between trees and their surroundings, and will resist development which will be likely to result in pressure to significantly prune or remove trees;</p> <p>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;</p> <p>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);</p> <p>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;</p> <p>7. where appropriate and relevant, require the provision of large-canopied tree lined streets as set out in the NPPF;</p> <p>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).</p> | | |
| - | | | | | | Policy 43 Floodlighting and Other External Artificial Lighting | | |
| 500 | Jo Edwards, Sport England | 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. | | Support noted. |
| 501 | Rachel Holmes, Environment Agency | Policy 43 Floodlighting and Other External Artificial Lighting | | | | Lighting; Lighting should be informed by guidance set out in the Artificial Lighting Guidance - Buildings, planning and development - Bat Conservation Trust (bats.org.uk) 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. | | The Bat Conservation Trust's website signposts to the updated Institute of Lighting Professionals' Bats and Artificial Lighting Guidance which is explicitly mentioned in the Policy's supporting text at paragraph 21.119 and thus a modification is not considered necessary. |
| - | | | | | | Improving design, delivering beautiful buildings and high-quality places | | |
| 502 | Tim Catchpole, Mortlake with East Sheen Society | | | | | <p>Theme: Improving design, delivering beautiful buildings and high quality places (Policies 44-46)</p> <p>Policy 44. Design Process</p> <p>Policy 45. Tall and Mid-rise building zones</p> <p>Policy 46. Amenity and living conditions</p> <p>[See the Council's Statement of Consultation (June 2023) 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> | | The Council's response to the respondent's comments on the Regulation 18 Plan (comments 1016, 1025 and 1040) focused on these distinct policies being logical within this theme about design quality, of which amenity is a part. The plan order is led by logical groupings and ensuring a user can navigate around the Plan. |
| - | | | | | | Policy 44 Design Process | | |
| 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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1018 in relation to Policy 44]</p> | | The Council's response to the respondent's comments on the Regulation 18 Plan (comment 1018) was that all development would be expected to have regard to the relevant character area set out in the Urban Design Study including proposals in Tall and Mid-Rise Building Zones and those within the Richmond and Richmond Hill character area, therefore no amendments to the Plan considered necessary. |
| 504 | Peter Willan, Paul Velluet and | 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> | | The Council's response to the respondent's comments on the Regulation 18 Plan (comment 1019) was that all development |

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| | Laurence Bain, Prospect of Richmond (and supported by the Friends of Richmond Green) | | | | | [See the Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1019 in relation to Policy 44] | | would be expected to have regard to the relevant character area set out in the Urban Design Study including proposals in Tall and Mid-Rise Building Zones and those within the Richmond and Richmond Hill character area, therefore no amendments to the Plan considered necessary. |
| - | | | | | | Policy 45 Tall and Mid-Rise Building Zones | | |
| - | | | | | | Note comments on the St Clare (Hampton Hill) Mid-rise Zone have been collated against the Place based strategy for Hampton & Hampton Hill to group with similar comments. | | - |
| - | | | | | | Note comments on the Teddington Mid-rise Zone have been collated against the Place-based Strategy for Teddington & Hampton Wick to group with similar comments. | | - |
| 505 | Jenny & Rod Linter | Policy 45 Tall and Mid-Rise Building Zones and Teddington mid-rise Zone | | No | 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 Tedington 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.</p> <p>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 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.</p> <p>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</p> | | <p>Justification for the approach is set out in the Urban Design Study. See response to comment 173 in relation to the Teddington mid-rise zone.</p> <p>Matters relating to utilities and infrastructure would be dealt with at full planning stage. Alongside planning obligations, the Community Infrastructure Levy (CIL) is collected (on CIL-liable floorspace) and can be spent on a wide range of potential infrastructure to support development in the borough.</p> <p>Matters relating to housing tenure are dealt with in other policies in the Local Plan, namely policies 11, 12 and 13. See response to comment cross-referenced against Policy 13.</p> |

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| | | | | | | <p>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, Historic England | Policy 45 Tall and Mid-Rise Buildings | | | | <p>Policy 45 – Tall and Mid-Rise Buildings</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> | | <p>Support for the general approach noted.</p> <p>An Additional Modification could be considered to reference the avoidance of harm at part A, see the Statement of Common Ground with Historic England.</p> <p>Additional comments noted. See response to comment 514 in respect of mapping.</p> |
| 507 | James Sheppard (CBRE), LGC LTD | Policy 45 Tall and Mid-Rise Building Zones Urban Design Study 7. Place-based Strategy for Teddington & Hampton Wick | N | N | Positively Prepared ; Justified; Effective; Consistent with national policy | <p>Urban Design</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> <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>3. Mid-Rise Building Zone: sub-area B2a should be included as a 'mid-rise building zone'.</p> | <p>Comments noted. The justification for the approach is set out in the Urban Design Study. The Urban Design Study has followed a well-established methodology, and the findings of the characterisation study were used to identify capacity for growth and an overall development strategy, with the broad areas for tall and mid-rise buildings. Mid-Rise and Tall Building Zones are based on scenario testing of heights and their impacts on the surrounding townscape.</p> <p>The Council's response to the respondent's comment on the Regulation 18 Plan (comment 1121) set out that the LGC site has not been included as a Mid-Rise Building Zone, noting its assessment as having a low probability of change largely due to its designation as a Key Business Area and Locally Important Industrial Land & Business Park designation (part of the West Twickenham cluster), together with it</p> |

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| | | | | | | <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.</p> <p>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 Figure 123 of the Urban Design Study 2023), 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 draft Policy 45, 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)”. 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 draft Policy 45c. 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 draft Policy 45d, 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, draft paragraph 22.30 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 section 4.2 of the Urban Design Study, 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> | | <p>having a medium sensitivity to and capacity for change, and further noting that Policy 45 recognises that proposals for mid-rise buildings may be considered suitable outside of the designated zones. Additional text was added in the Urban Design Study 2023 to the sensitivity section of the character profile for Teddington Residential (sub-area B2a) to reference views from within Bushy Park. No further amendments are therefore considered necessary.</p> |
| 508 | Mark Knibbs (Avison Young with input from Montagu Evans and Energist), St George plc and Marks and Spencer | Building Heights – Site Allocation 31 (Kew Retail Park), Place Based Strategy for Kew and Policy 45 | N o | N o | N o | <p>Positively Prepared ; Justified; Effective; Consistent with national policy</p> <p>Building Heights – Site Allocation 31 (Kew Retail Park), Place Based Strategy for Kew and Policy 45 Context (Regulation 18 Representations)</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"> - 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). - Amend restrictive and prescriptive policies relating to specific height parameters. - Amend draft policies to comply with national planning policy, as well as strategic planning policies set out within the London Plan (2021). <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>Regulation 19 Representations</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).</p> <p>Paragraph 31 of the NPPF (2021) states 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 into account relevant market signals.”</p> | | <p>Concerns noted. Justification for the approach is set out in the Urban Design Study. The Urban Design Study has followed a well-established methodology, and the findings of the characterisation study were used to identify capacity for growth and an overall development strategy, with the broad areas for tall and mid-rise buildings. Mid-Rise and Tall Building Zones are based on scenario testing of heights and their impacts on the surrounding townscape.</p> <p>The Council’s response to the respondent’s comment on the Regulation 18 Plan (comment 1037) included that amendments to the assessment of sensitivity and probability were not considered necessary, and explained the scenario testing; the Urban Design Study is considered to provide a proportionate evidence based to justify the zones.</p> |

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| | | | | | <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 – 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.</i></p> <p>b. <i>Justified – an appropriate strategy, taking into account the reasonable alternative, and based on proportionate evidence.</i></p> <p>c. <i>Effective – 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.</i></p> <p>d. <i>Consistent with National Policy – enabling the delivery of sustainable development in accordance with policies in the Framework and other statements of national planning policy, where relevant.”</i></p> <p>Urban Design Study 2023</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"> - A cohesive layout; - has poor legibility; - contains buildings of poor architectural quality; and - large areas of hardstanding which lack any streetscape or townscape qualities. <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 Figure 1).</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/foliage).

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

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| | | | | | <p>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.</p> <p>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.</p> <p>Policy 45 – Tall and Mid-Rise Building Zones</p> <p>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).</p> <p>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.</p> <p>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.</p> <div data-bbox="706 869 1584 1604" style="border: 1px solid black; padding: 10px;"> <p>Policy 45</p> <p>Tall and Mid-Rise Building Zones</p> <p>Definitions:</p> <p>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.</p> <p>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</p> <p>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:</p> <p><u>Visual Impacts</u></p> <ol style="list-style-type: none"> 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. </div> | | |
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| | | | | | | <p>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.</p> <p>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'</p> <p>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'</p> <p><u>Spatial Hierarchy</u></p> <p>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.</p> <p>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.</p> <p>9. Proposals for Tall Buildings will not be permitted outside the identified Tall Building Zones (see Appendix 3).</p> <p>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</p> <p><u>Fire Safety</u></p> <p>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.</p> <p>Tall and Mid-Rise Building Near the River Thames Frontage</p> <p>B. Proposals for tall and mid-rise buildings should address the following criteria:</p> <ol style="list-style-type: none"> 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 respond 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. | | |
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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.

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| | | | | | | <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 | N | 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).</p> <p>[See Appendix 6, along with the Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1038 in relation to: Policy 45.]</p> | | Resubmission of Regulation 18 consultation comments noted. See also the Council’s responses to comments 1030, 1037 and 1038 on the Regulation 18 consultation. |
| 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"> 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 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 '. [...] | 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’. | It is considered that there are policies already within the Local Plan against which these matters/impacts would be appropriately assessed at full planning stage, namely Policies 28, 31, 35, 36, 44, 46 and the supporting text of Policy 45. |

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| 511 | Katherine Drew, The Royal Parks | Policy 45 Tall and mid-rise building zones | | | | | 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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1021 in relation to tall buildings around the Parks] | | The Council's response to the respondent's comment on the Regulation Plan (comment 1021) was to note that Part A.7 of the policy requires the massing of tall buildings to respect the proposals of their local environment, including parks, and Part A.3 refers to views and vistas and Policy 31. It was further noted that views from Richmond and Bushy Park have been considered as part of the methodology which underpinned Arup's testing of tall building scenarios for zones identified in the Urban Design Study. The Royal Parks would also have the opportunity to comment on any future planning applications which may impact on the park. |
| 512 | Smruti Patel (Avison Young), Avanton Richmond Developments LTD | Policy 45 Tall and Mid-Rise Building Zones | | No | | Consistent with national policy | 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 and tall buildings ³ 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 ⁴ ⁴ https://www.gov.uk/guidance/fire-safety-and-high-rise-residential-buildings-from-1-august-2021 [See also comment 263 in relation to Site Allocation 29: Homebase, Manor Road, North Sheen, the Urban Design Study and building heights] | | General support for the approach noted. An Additional Modification to paragraph 22.32 of the supporting text could be considered to advise applicants to consult the Government's most recent Fire safety and high-rise residential buildings development guidance. |
| 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. | | Part A Point 10 of the policy states: "Proposals for tall buildings should not exceed the appropriate height range identified for the Tall Building Zones in Appendix 3." The colour coding of these zones in the Policy Map indicates where these maximum identified heights could be suitably located, though how they are dispersed across the zone is a matter for consideration at full planning stage and/or pre-application, when greater design detail/modelling/views and heritage analysis etc of the proposed development etc has been provided, to allow for a comprehensive assessment of impacts. See also the Council's response to the respondent's comment on the Regulation 18 Plan (comment 1026) which set out further details including amendments made to the Urban Design Study 2023 to reflect the context for Kew Gardens WHS in the Richmond Tall Building Zone. |
| 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. | | General support for the approach noted. In respect of mapping, there is an explanation at the start of Appendix 3. An interactive online policies map was available alongside the Regulation 19 Plan, which allows users to toggle layers on and off and see what applies in a particular location. An Additional Modification could be considered which clarifies in the Appendix 3 text that red areas denote tall |

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| | | | | | | | | | building zones and orange areas denote mid-rise building zones; it may be appropriate to consider during the course of the Examination any further mapping improvements. |
| 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. | | The Council's response to the EA's comment on the Regulation 18 Plan (comment 1031) was to note that there is sufficient reference in other policies in the Local Plan (specifically policies 39, 40 and 42) to enable and ensure assessment of the impact of a tall building on rivers' ecosystems, and that the submission of a transient overshadowing analysis could be requested as part of the planning application process in line with these policy requirements, where deemed relevant. |
| 516 | Neil Henderson (Gerald Eve), Reselton Properties | Policy 45 Tall and Mid-Rise Building Zones | | N | o | 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 Council's Statement of Consultation (June 2023) 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. | The Council responded to the respondent's comment on the Regulation 18 Plan (see comment 1027). This noted that the appropriate heights defined within the Urban Design Study follow the same methodology as the Urban Design Study for the London Borough of Wandsworth, and the Wandsworth Local Plan has since been adopted (July 2023), including Policy LP4, Part B of which states that "Proposals for tall buildings will only be appropriate in tall building zones identified on tall building maps included at Appendix 2 to this Plan...." The approach in the Urban Design Study recognises the necessary strategic scale of the analysis undertaken for each of the tall building zones, given that it is a borough-wide study. The methodology for defining the tall building zones and appropriate heights has been developed in discussion with the GLA to ensure the approach is in accordance with London Plan Policy D9. See also comment 514, the response from the GLA which states: '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.' |
| 517 | Summer Wong (RPS), Notting Hill Genesis | Policy 45 Tall and Mid-Rise Building Zones (p.328-330) | N | o | N | Positively Prepared ; Justified; Effective; Consistent with national policy | Policy 45 Tall and Mid-Rise Building Zones (p.328-330) 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. | | Support noted. |
| 518 | Peter Willan, Paul Velluet and Laurence Bain, Prospect 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... | | The justification for the approach and identification of Tall Building Zones is set out in the Urban Design Study. The Council's responses to the respondent's comments on the Regulation 18 Plan (comment 1032 and 1033) set out that the |

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| | Richmond (and supported by the Friends of Richmond Green) | | | | | [See the Council's Statement of Consultation (June 2023) 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] | | methodology underpinning the Urban Design Study is considered to be robust and sound, and provided further details on Richmond Station and North Sheen and that the Council considered the wording in the Urban Design Study as appropriate. |
| 519 | Peter Willan and Paul Velluet, Old Deer Park Working Group | 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 Council's Statement of Consultation (June 2023) 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] | | The justification for the approach and identification of Tall Building Zones is set out in the Urban Design Study. The Council's responses to the respondent's comments on the Regulation 18 Plan (comment 1035 and 1034) set out that the methodology underpinning the Urban Design Study is considered to be robust and sound, and provided further details on Richmond Station and North Sheen and that the Council considered the wording in the Urban Design Study as appropriate. |
| - | Gerard Manley (Firstplan), Baden Prop Limited | | | | | [See comment 250 in relation to Site Allocation 25, the tall-building zone and the Urban Design Study] | | See response to comment 250. |
| - | Geoff Bond, Ham & Petersham Association & Amenities Group | | | | | [See comment 230 in relation to high and mid sized buildings in Ham] | | See response to comment 230. |
| - | | | | | | Policy 46 Amenity and Living Conditions – no comments received | | |
| - | | | | | | Reducing the need to travel and improving the choices for more sustainable travel | | |
| 520 | Katherine Drew, The Royal Parks | 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 Council's Statement of Consultation (June 2023) 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] | | The Council's response to the Royal Parks comment on the Regulation 18 Plan (comment 1049) was that the impact of development proposals on air quality and wildlife habitats and vegetation is assessed by the Environmental Health team and not through the transport assessment process. Other policies in the Plan including Policy 53 are considered to provide an appropriate framework for this assessment. |
| 521 | Jonathan Blathwayt, GLA on behalf of Mayor of London | 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. | | Noted the LPG was adopted in November 2022. The Local Plan already supports walking and cycling, the Healthy Streets approach and the modal shift target. |
| 522 | Duncan McKane, London Borough of Hounslow | 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 | | Comments noted. The Transport Background Topic Paper sets out the traffic modelling for the Borough for the lifetime of the Plan and considers the impact on Hounslow. See the Statement of Common Ground with LB of Hounslow which sets out the further liaison on this issue. |

| | | | | | | 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, Transport for London (TfL) | | | | | [See comment 11 in relation to a strategic transport assessment] | | - | | | | | | |
| - | Tim Catchpole, Mortlake with East Sheen Society | | | | | [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] | | - | | | | | | |
| - | | | | | | Policy 47 Sustainable Travel Choices (Strategic Policy) | | | | | | | | |
| 523 | Sammantha Rose, National Highways | Policy 47 Sustainable Travel Choices (Strategic Policy) (traffic modelling) | | | | <p>Policy Comments</p> <p>We have also provided additional comments on those key policies relevant to National Highways below: <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> | | <p>The Infrastructure Delivery Plan (IDP) (2023) set out the updated evidence base, including details on transport infrastructure drawing on the Local Implementation Plan, borough context and short to medium term transport priorities.</p> <p>The Transport Background Topic Paper sets out the traffic modelling for the Borough for the lifetime of the Plan.</p> <p>See the Statement of Common Ground with National Highways.</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</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> </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 | <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>Part B – wording of the policy does not preclude contributions towards public transport in higher PTAL areas. As set out in the response to the TfL comment on the Regulation 18 Plan (comment 1047), this will be assessed on a case-by-case basis in relation to proposals that come forward.</p> <p>As set out in the response to the TfL comment on the Regulation 18 Plan (comment 1047), on Part C – Active Travel Zone (ATZ) Assessment can be implemented through Healthy Streets.</p> |
| 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 | <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> | | | | | | | | | | | | |

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| | | | | | | 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. | 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. | | |
| 525 | Craig Hatton, Network Rail (Southern) | Policy 47 Sustainable Travel Choices (Strategic Policy) | | | | 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. 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". 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. Conclusions 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] 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. | | Policy 1 encourages increased permeability of sites to maximise access to walking, cycling and public transport routes. If a new development was in close proximity to a rail station, it would be expected to enhance access to this station. Paragraph 23.23 in the supporting text to Policy 47 refers to the need to improve quality and connectivity of transport interchanges, referring to transport schemes set out in the Local Implementation Plan. The Council considers the strategic policy to be a sufficiently robust framework, but could consider a suitably worded modification to emphasise this as part of further work during the Examination process. | |
| 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. | | The Transport Background Topic Paper sets out the traffic modelling for the Borough for the lifetime of the Plan. Car and motorcycle daily trips are forecast to fall in Hounslow, Kingston and Richmond. Any localised increase will be able to be absorbed by the network. | |
| 527 | Nikki Nicholson, Surrey County Council | Policy 47 Sustainable Travel Choices (Strategic Policy) | | | | Highways and Transport 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. | | Comments noted. See the Statement of Common Ground with Surrey County Council. | |
| 528 | Suzanne Parkes, Elmbridge Borough Council | Policy 47 Sustainable Travel Choices (Strategic Policy) | | | | Policy 47 – Sustainable travel choices 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. | | The Transport Background Topic Paper sets out the traffic modelling for the Borough for the lifetime of the Plan, and considers the impact on Elmbridge. See the Statement of Common Ground with Elmbridge Borough Council. | |
| 529 | Tim Catchpole, Mortlake with East | Policy 47 Sustainable Travel Choices | | | | Theme: Reducing the need to travel and improving the choices for more sustainable travel (Policies 47-48) Policy 47. Sustainable travel choices | | The Transport Topic Paper sets out the traffic modelling for the Borough for the lifetime of the Plan. This paper contains information about the TFL modelling that | |

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| | Sheen Society | (Strategic Policy) | | | <p>[See the Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments – comment 1044 in relation to Policy 47]</p> <p>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?</p> <p>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?</p> <p>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.</p> | | <p>has been used to calculate transport demand over time.</p> <p>Generally station improvements are beyond the remit of the Local Plan as they can be brought forward separately and do not require safeguarding of any land. Network Rail's accessibility programmes will have their own criteria for assessing funding. Paragraph 23.23 in the Plan already refers to the need to improve quality and connectivity of transport interchanges, referring to transport schemes set out in the Local Implementation Plan. It is considered the Plan provides an appropriate policy framework for assessing if improvements are deemed necessary for specific sites that come forward for development.</p> |
| 530 | Councillor Niki Crookdake, Green Party Councillor for Mortlake & Barnes Common | Policy 47 Sustainable Travel Choices (Strategic Policy) | | | <p>b. Reasons for the proposed amendments</p> <p>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.</p> <p>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.</p> <p>All this will create a significant additional burden on the transport infrastructure in Richmond and the neighbouring boroughs of Wandsworth and Hounslow in particular.</p> <p>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 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. 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>1. Section 23. Reducing the need to travel and improving the choices for more sustainable travel</p> <p>a. Local Plan proposed amendments</p> <p>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.</p> <p>'Policy 47. Sustainable travel choices (Strategic Policy)</p> <p>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:</p> <p>Location of the development</p> <p>B. Propose major developments (see Table 1 for a definition) in areas that either already have a 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). Depending on the impact of the development relative to the capacity of the bus and rail network in its final assessment year, this may include applicants making financial contributions to increase capacity and/or improve infrastructure on the passenger transport network....</p> <p>Assessing the impact of developments</p> <p>E. Demonstrate that their proposed developments do not have a severe impact on the operation, safety, or accessibility of the local or strategic road network. 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 Local Implementation Plan (LIP 3) adopted in 2019 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>The Transport Background Topic Paper sets out the traffic modelling for the Borough for the lifetime of the Plan, and addresses development in the Mortlake area including the cumulative traffic arising from major sites.</p> <p>In addition, at the decision-making level, the Council encourages applicants to use the pre-application advice service it offers to work with Council and TfL Officers to agree with parameters of any vehicular traffic impact assessment and the tools used to complete this. In practice, where the development is a major one a full transport assessment is required which will involve the use of nationally used assessment tools and include the impact on links and junctions. No amendments to the Plan are therefore considered necessary.</p> <p>Note, in respect of the petition, this was considered by both the Council (at full Council on 11 July 2023) and the GLA. Planning Committee resolved to grant planning permission for redevelopment of the Stag Brewery site on 19/07/2023, subject to a legal agreement.</p> |

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| | | | | | <p>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.</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>I would ask the inspector to consider, if the Transport Strategy, based on evidence over 5 years old, is sound and should be reviewed.</p> <p>c. Relevant Policies and other evidence</p> <table border="1" data-bbox="697 724 1647 1911"> <tr> <td data-bbox="697 724 949 1522"> <p>National Planning Policy (NPPF) Framework 2021 – Plan making and delivery</p> </td> <td data-bbox="949 724 1647 1522"> <p>Strategic policies</p> <p>20. Strategic policies should .. make sufficient provision for.. b) infrastructure for transport ...</p> <p>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. 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>Preparing and reviewing plans</p> <p>31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.</p> <p>33. 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| | | | | | | <p>exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.</p> <p>B. When a proposed development is acceptable in terms of use, scale and massing, ... but it exceeds the capacity identified in a site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will be identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.</p> | | |
| | | | | | | <p>London Policy SD2 Collaboration in the Wider South East</p> <p>Mayor will work with partners to plan the necessary infrastructure to support 'good growth'. LAs have a duty to co-operate with other LAs to help plan any infrastructure changes required.</p> | | |
| | | | | | | <p>London Policy T4 Assessing and mitigating transport impacts</p> <p>E The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.</p> | | |
| | | | | | | <p>Urban Design Study 2023</p> <p>Page 210 – the Impact of the increased density on existing social infrastructure and transport network needs to be assessed .. Page 235 – the consultations in East Sheen, Kew, Barnes and Mortlake identified a reduction in traffic and improvement in public transport as a current key area of concern and an area of most importance in future.</p> | | |
| | | | | | | <p>LIP 3 (consultation from Nov 2018 to April 2019)</p> <p>Outcome 5: The public transport network will meet the needs of a growing London – states that Richmond will work in partnership with TFL, Network Rail and SW Rail to improve public transport across the borough .. Outcome 8: Active, efficient and sustainable travel will be the best option for new developments in areas with high levels of public transport accessibility (PTALs) e.g. Richmond and Twickenham centres. Reference to the fact that there are no Mayor designated Opportunity Areas for growth within the Richmond. Page 27 – reference to the correlation between areas with low active travel levels and low PTALs. Targeting these areas will be a priority for infrastructure improvements .. [for] walking ..cycling ..bus stops and ..rail stations .. Long term interventions to 2041 - no mention of the four developments around Chalker's Corner, or their cumulative impact.</p> | | |
| | | | | | | <p>Local Plan Policy Introduction</p> <p>2.23 We cannot act in isolation and therefore work hand in hand with communities and local partners Our partner organisations and agencies ..[and] neighbouring boroughs as well as the Mayor of London, the Greater London Authority (GLA) and Transport for London (TfL), particularly where issues cross borough boundaries.</p> | | |
| 531 | Jo Edwards, Sport England | Policy 47 Sustainable Travel Choices (Strategic Policy) | | | | Sport England supports this policy. | | Support noted. |
| 532 | Luke Burroughs, Transport | Policy 47 Sustainable Travel | | | | Policy 47. Sustainable travel choices (Strategic Policy) | | Support noted. |

| | Trading Limited Properties Limited (TTLP) | Choices (Strategic Policy) | | | | Part H. of this policy states "H. 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" TTLP 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. | | | | | | | | |
|---------|---|---|--|--|--|--|---------|--|--|-------|---|---|--|----------------|
| 533 | Richard Carr, Transport for London (TfL) | Paragraph 23.1 | | | | <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>23.1</td> <td>We strongly welcome the borough's commitment to promoting sustainable travel, decreasing car use, and improving air quality. However, the commitment to decreasing car use could be made more prominent by referring to it in policies. As stated, <i>'Ensuring that walking, cycling and public transport are the natural choice for trips to and from new developments is vital if these goals are to be achieved.'</i> We also welcome confirmation that Local Plan policies should be read alongside those in the London Plan and the Mayor of London's Transport Strategy.</td> <td>We welcome the inclusion of commitments to promote sustainable travel, decrease car use and improve air quality within Policy 47 itself.</td> </tr> </tbody> </table> | Section | Track change/comment – Reg. 18 | Updated track/change comment – Reg. 19 | 23.1 | We strongly welcome the borough's commitment to promoting sustainable travel, decreasing car use, and improving air quality. However, the commitment to decreasing car use could be made more prominent by referring to it in policies. As stated, <i>'Ensuring that walking, cycling and public transport are the natural choice for trips to and from new developments is vital if these goals are to be achieved.'</i> We also welcome confirmation that Local Plan policies should be read alongside those in the London Plan and the Mayor of London's Transport Strategy. | We welcome the inclusion of commitments to promote sustainable travel, decrease car use and improve air quality within Policy 47 itself. | | Support noted. |
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| 534 | Richard Carr, Transport for London (TfL) | Paragraph 23.2 | | | | <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>23.2</td> <td>When referring to the Council's sustainable transport mode split targets, it is helpful to clarify that developments will need to demonstrate how they are contributing to achievement of those targets.</td> <td>We welcome the addition of the final sentence confirming that 'Planning applicants proposing major developments will need to demonstrate how their proposals help meet these targets.'</td> </tr> </tbody> </table> | Section | Track change/comment – Reg. 18 | Updated track/change comment – Reg. 19 | 23.2 | When referring to the Council's sustainable transport mode split targets, it is helpful to clarify that developments will need to demonstrate how they are contributing to achievement of those targets. | We welcome the addition of the final sentence confirming that 'Planning applicants proposing major developments will need to demonstrate how their proposals help meet these targets.' | | Support noted. |
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| 535 | Richard Carr, Transport for London (TfL) | Paragraph 23.10 | | | | <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>23.10</td> <td>When referring to London Plan minimum standards for cycle parking, it is helpful to add that developments that exceed minimum cycle parking provision will be encouraged.</td> <td>We welcome amended wording which now clarifies that 'Cycle parking should, at least, be provided in accordance with the minimum standards in the London Plan.'</td> </tr> </tbody> </table> | Section | Track change/comment – Reg. 18 | Updated track/change comment – Reg. 19 | 23.10 | When referring to London Plan minimum standards for cycle parking, it is helpful to add that developments that exceed minimum cycle parking provision will be encouraged. | We welcome amended wording which now clarifies that 'Cycle parking should, at least, be provided in accordance with the minimum standards in the London Plan.' | | Support noted. |
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| 536 | Richard Carr, Transport for London (TfL) | Paragraph 23.21 | | | | <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>23.21</td> <td>We welcome safeguarding of bus garage facilities, but it should be made clear that in all cases TfL agreement will be needed to confirm that any replacement facilities are fit for purpose and capable of being delivered, or that existing facilities are surplus to requirements. This will take into account the need for additional space to accommodate alternative fuel facilities.</td> <td>We welcome amended wording which recognises TfL's role and states that 'The loss of existing bus garages will be resisted, to safeguard capacity for efficient and sustainable operation of the network, unless it is demonstrated, and confirmed by Transport for London, that it is operationally no longer needed or enhanced re-provision has been made as part of the redevelopment of the site or elsewhere in a convenient and accessible alternative'</td> </tr> </tbody> </table> | Section | Track change/comment – Reg. 18 | Updated track/change comment – Reg. 19 | 23.21 | We welcome safeguarding of bus garage facilities, but it should be made clear that in all cases TfL agreement will be needed to confirm that any replacement facilities are fit for purpose and capable of being delivered, or that existing facilities are surplus to requirements. This will take into account the need for additional space to accommodate alternative fuel facilities. | We welcome amended wording which recognises TfL's role and states that 'The loss of existing bus garages will be resisted, to safeguard capacity for efficient and sustainable operation of the network, unless it is demonstrated, and confirmed by Transport for London, that it is operationally no longer needed or enhanced re-provision has been made as part of the redevelopment of the site or elsewhere in a convenient and accessible alternative' | | Support noted. |
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| 537 | Sammantha Rose, National Highways | 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</p> | | Paragraph 23.24 is carried forward from the adopted Local Plan and refers generally to transport schemes. Table 10.1 in the London Plan includes an indicative list of transport schemes. It is recognised the tools to secure contributions would vary depending on the site context and nature of contributions; Policy 55 provides a broad framework for securing infrastructure. | | | | | | |

| | | | | | | Investment Strategy (RIS), nor can mitigation requirements affecting the SRN be included within the Community Infrastructure Levy at a planning application stage. | | | | | | | | |
|--|--|--|----|----|----|--|--|--|--|--|--|--|--|---|
| 538 | Elena Mikhaylova | Policy 47 Sustainable Travel Choices (Strategic Policy) | No | No | No | Positively Prepared ; Effective; Justified; Consistent with national policy 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. | All policies mentioned in my comments above must be cancelled immediately. | The policy will not bar people from driving, instead the Plan promotes an increase of active travel and public transport use thereby converting unnecessary car journeys that could be completed using other modes. The Plan does not involve the shutting of roads. The policy is consistent with the London Plan and National Planning Policy Framework – as well as national guidance and policy on active travel and public transport. | | | | | | |
| - | | | | | | Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management | | | | | | | | |
| 539 | John Sadler, CPRE London | Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management | | No | | Justified; Consistent with national policy Car free development 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. 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. | | There is not intended to be any conflict with the London Plan, see comments from Transport for London (TfL) on the site allocations which are addressed where appropriate. With regard to front garden parking, the Council promotes permeable surfacing including soft landscaping, with reference at paragraph 23.32 to materials and landscaping to diminish negative impacts as set out in the Transport SPD. Although not all conversions require planning permission, the Council estimates there are 1,500 to 2,000 properties where occupiers gain unauthorised vehicle access over the pavement to front gardens, enforcement is impractical and could unsatisfactorily penalise residents who could instead provide a safer and greener arrangement if encouraged to do so. An additional modification could be considered to reflect the Council's recently updated highway authority requirements for vehicle crossover application criteria at part D and paragraph 23.32. | | | | | | |
| 540 | Richard Carr, Transport for London (TfL) | 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>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. 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). In F8, it may not be appropriate to require car club spaces to be provided in developments in areas of very good</td> <td>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. 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. We note that no changes have been made to F8</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 | 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. 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). In F8, it may not be appropriate to require car club spaces to be provided in developments in areas of very good | 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. 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. We note that no changes have been made to F8 | | Note TfL guidance on Parking Design and Management Plans is due to be issued, but normally a reference would be added once it is published and the scope and relevance of the guidance can then be referred to. An additional modification could be considered during the Examination process to add reference once it is published. Regarding not asking Developers of large sites in areas with a high PTAL to provide car club spaces, the Council's view (as set out in the response to the TfL comment on the Regulation 18 Plan (comment 1071)) is that we should allow residents to access car club vehicles, as they help reduce car ownership by providing people with the use of a car when, on the rare occasions they need one. Part G – noted, (as set out in the response to the TfL comment on the Regulation 18 Plan (comment 1071)) whilst the Council |
| Section | Track change/comment – Reg. 18 | Updated track/change comment – Reg. 19 | | | | | | | | | | | | |
| Policy 48. Vehicular Parking standards, Cycle Parking, Servicing and Construction Logistics Management | 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. 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). In F8, it may not be appropriate to require car club spaces to be provided in developments in areas of very good | 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. 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. We note that no changes have been made to F8 | | | | | | | | | | | | |

| | | | | | | | | | | |
|-----|---|--|---------|--------|--|--|---|---|--------|---|
| | | | | | | | connectivity where alternatives to car use can provide for all travel needs. 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 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. | We note that no changes have been made to part G In part H we welcome reference to provision of on street cycle parking where 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 | | may consider provision of on-street disabled parking as part of a development, but only where there is absolutely no alternative to do so on site. Whilst this can be considered on a case-by-case basis, we do not want to encourage it in policy. There are significant constraints and costs associated with providing disabled parking spaces on-street, particularly in Richmond borough where on-street spaces can be scarce. Part I – (see above in relation to car clubs). |
| 541 | Natasha Styles (The Planning Bureau Limited), McCarthy & Stone Retirement Lifestyles Ltd | Policy 48 Vehicular Parking Standards | | N o | 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. | Recommendation 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>'. | It is recognised that some older people require to drive or be driven due to lowered mobility. Though, the Plan seeks to promote journeys by active travel and public transport as much as possible. It would not be appropriate to exempt specialist housing explicitly from car-free development. | | |
| - | Richard Mundy | Bike shelters and car chargers | Y es | N o | Y es | Effective | [See comment 316 in relation to bike shelters and car chargers in front of houses] | | - | |
| - | | | | | | | Securing new social and community infrastructure to support a growing population | | | |
| 542 | Tim Catchpole, Mortlake with East Sheen Society | Securing new social and community infrastructure to support a growing population | | | | | Theme: Securing new social and community infrastructure to support a growing population (Policies 49-50) [See the Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments – comments 1080 and 1088 in relation to these policies] No comments. | | Noted. | |

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| - | | | | | | | Policy 49 Social and Community Infrastructure (Strategic Policy) | | |
| 543 | Tom Clarke, Theatres Trust | 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). | | Support noted. |
| 544 | Jo Edwards, Sport England | 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). | | Support for Policy 49 noted. It is considered that for applications involving any loss of a social and community infrastructure, including sport and recreation facilities, it is very important that the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure is fully considered. It is therefore not considered appropriate to expressly exclude sport and recreation facilities from the marketing requirements set out in Appendix 2. |
| - | 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 reprovision 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 | | | | | Asset of Community Value (ACV) 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 . | | Comment noted. It should be noted that in 2012 the Government issued a non-statutory advice note which states (at Paragraph 2.20) that <i>'...it is open to the Local Planning Authority to decide whether listing as an asset of community value is a material consideration if an application for change of use is submitted, considering all circumstances of the case.'</i> |
| - | | | | | | | Policy 50 Education and Training (Strategic Policy) | | |
| 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. | | The Council's response to the respondent's comment on the Regulation 18 Plan (comment 1085) was that given the Site Allocations identified in the borough with potential to meet future needs for schools and the limited opportunities for large sites in the borough, it is not considered necessary at this time to undertake site searches and safeguard sites in particular categories. |
| 547 | Councillor Niki Crookdake , Green Party Councillor for Mortlake & Barnes Common | Policy 50 Education and Training (Strategic Policy) | | | | | b. Reasons for the proposed amendments 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 | 3. Section 24 - Securing new social and community infrastructure to support a growing population. Section 24 is included in pages 289-299 of the Local Plan. I have set out below extracts from this text, with suggested amendments highlighted in yellow. a. Local Plan proposed amendments 'Policy 50. Education and Training (Strategic Policy) A. 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: | Comments noted. Preparation of Policy 50 has been informed by the Council's School Place Planning Strategy (SPPS) which sets out the strategic framework for the provision and management of school places within the borough. The SPPS is regularly reviewed and was most recently approved in March |

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| | | | | | <p>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"> • To cover the council itself – as they are a large local employer, who can significantly contribute to upskilling and employing the local workforce. • Reducing the development threshold from 50 to 10 units, as many of the Richmond developments will be smaller, infill sites. • 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. <p>This change is in line with national policy and supports whole plan delivery.</p> <p>c. Relevant Policies and other evidence</p> <table border="1" data-bbox="697 562 1543 1822"> <tr> <td data-bbox="697 562 890 1822"> <p>National Planning Policy (NPPF) Framework 2021 – Plan making and delivery</p> </td> <td data-bbox="890 562 1543 1822"> <p>Strategic policies</p> <p>20. Strategic policies should .. make sufficient provision for, employment .. education ..</p> <p>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. 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>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.</p> <p>Preparing and reviewing plans</p> <p>31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.</p> <p>33. 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>Development contributions</p> <p>34. 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>Examining Plans</p> <p>35. ...Plans are ‘sound’ if:</p> <p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs²¹; and is informed by agreements with other authorities</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters..</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development ..</p> </td> </tr> <tr> <td data-bbox="697 1822 890 1879"> <p>London Policy S3, Part A</p> </td> <td data-bbox="890 1822 1543 1879"> <p>S3 Part A –</p> </td> </tr> </table> | <p>National Planning Policy (NPPF) Framework 2021 – Plan making and delivery</p> | <p>Strategic policies</p> <p>20. 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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 <i>parts B and C.</i></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 <i>...The same obligation to employ locally 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"> • All residential developments providing 10 units or more; and • All commercial developments consisting of 400 sqm or more of employment space. <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 <i>exceptional</i> 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>2023. It is noted that the SPPS discusses applications made by Richmond residents to out-borough schools (including schools within 5 miles of the Stag Brewery site), as well as out-borough demand for school places within Richmond. Additional wording to Policy 50 is not considered necessary.</p> <p>It is noted that the Council's Planning Committee resolved to grant planning consent for the mixed-use scheme on the former Stag Brewery site, including a new secondary school, in July 2023. The committee report discusses the need for the secondary school in this location.</p> <p>Requirements concerning Local Employment Agreements would continue to be applicable to Council-led development.</p> <p>As stated at paragraph 24.41, the selection of the thresholds at which an LEA between the developer and the Council will apply is to ensure that the requirement for an LEA is applied to major developments where there is likely to be scope to provide a significant contribution on site to employment and training opportunities in the borough. It is therefore not considered necessary to modify the thresholds.</p> <p>As the details of the LEA will be subject to negotiation, tailored to site specific circumstances and proportionate to the scale of development proposed, additional wording is not considered necessary at paragraph 24.44.</p> |
| <p>National Planning Policy (NPPF) Framework 2021 – Plan making and delivery</p> | <p>Strategic policies</p> <p>20. Strategic policies should .. make sufficient provision for, employment .. education ..</p> <p>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. 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>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.</p> <p>Preparing and reviewing plans</p> <p>31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.</p> <p>33. 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>Development contributions</p> <p>34. 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>Examining Plans</p> <p>35. ...Plans are ‘sound’ if:</p> <p>a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs²¹; and is informed by agreements with other authorities</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters..</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development ..</p> | | | | | | | | | | |
| <p>London Policy S3, Part A</p> | <p>S3 Part A –</p> | | | | | | | | | | |

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| | | | | | | | To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should: <ol style="list-style-type: none"> 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; 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) 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 | | |
| - | | | | | | | Creating safe, healthy and inclusive communities | | |
| 548 | Tim Catchpole, Mortlake with East Sheen Society | | | | | | Theme: Creating safe, healthy and inclusive communities (Policies 51-54) [See the Council's Statement of Consultation (June 2023) 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. | | Noted. |
| - | | | | | | | Policy 51 Health and Wellbeing (Strategic Policy) | | |
| 549 | Solomon Green | Creating safe, healthy and inclusive communities | | | | | Under the Health section there was no room to draw attention to the lack of A & 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. | | These issues are beyond the remit of the Local Plan. The IDP (2023) notes the nearest hospitals for acute A&E are outside of the borough – the nearest being West Middlesex University Hospital NHS Trust and Kingston Hospital NHS Trust, and the estates strategy of the London Ambulance Service; no issues have been raised by statutory health bodies. |
| 550 | Jo Edwards, Sport England | Policy 51 Health and Wellbeing (Strategic Policy) | | | | | 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. | | Support noted. The supporting text generally references the Council's own strategies and does not signpost to any other external guidance, and so its inclusion would not be appropriate here. It is noted that the policy is already consistent with the guidance. The supporting text to Policy 37 at paragraph 21.29 already gives particular emphasis on physical activity and active travel connected with leisure and fitness, linked with Living Locally. |
| - | | | | | | | Policy 52 Allotments and Food Growing Spaces | | |
| 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. | | The Council's response to the respondent's comment on the Regulation 18 Plan (comment 1101) was that the matter of management of plots and potential subdivision is not a matter that the Local Plan can address, and that the Local Plan is not the vehicle for designating allotments as statutory as this is covered under the Allotments Act. No amendment considered necessary. |
| - | | | | | | | Policy 53 Local Environmental Impacts | | |
| 552 | David Wilson, Thames Water | Policy 53 Local Environmental Impacts | | No | Consistent with national policy | | Policy 53. Local Environmental Impacts - Development within the vicinity of Sewage Pumping Stations (and Sewage Works) Works | 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 | The Council's response to Thames Water's comment on the Regulation 18 Plan (comment 1104) was that Policy 53 requires the submission of a relevant |

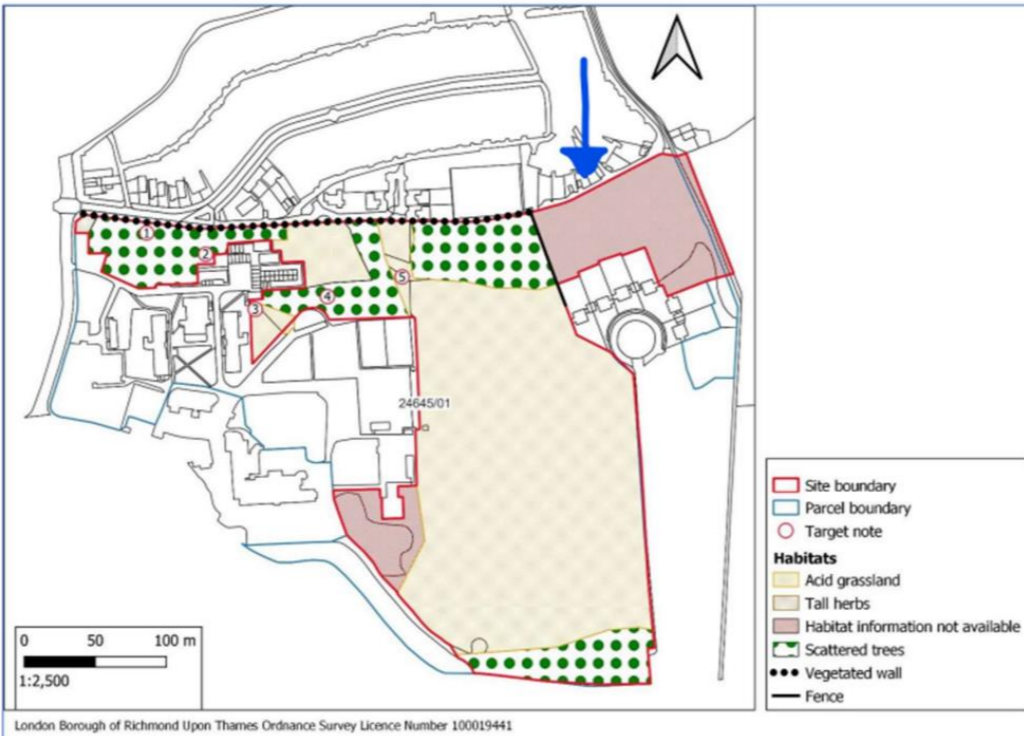
| | | | | | | | | |
|-----|--|---------------------------------------|-----|-----|-----|---|---|--|
| | | | | | | <p>The new Local Plan should assess impact of any development within the vicinity of sewage works and sewage pumping stations in line with the Agent of Change principle set out in the NPPF and Policy D13 of the London Plan 2021.</p> <p>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.</p> <p>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..."</p> <p>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> | <p><i>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."</i></p> | <p>impact assessment 'where necessary' and that Thames Water did not provide evidence as to why 800m and 15m radiuses were being proposed. Furthermore, it was confirmed that Thames Water would be a statutory consultee to any proposed development within close proximity of a sewage works and/or pumping station. Amendments were made to the policy wording and supporting text of Policy 53, and also to the Site Allocation for Twickenham Stadium to refer to the sewage treatments works to the north of the site. No further amendments considered necessary.</p> |
| 553 | Peter Thompson, National Physical Laboratory (NPL) | Policy 53 Local Environmental Impacts | Yes | Yes | Yes | <p>It is well reported that NPL undertakes research and programmes of work into air quality as well as greenhouse gas emissions measurement https://www.npl.co.uk/greenhouse-gas-emissions-measurement-modelling. Policy 53 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.</p> | | Noted. |
| 554 | Rachel Holmes, Environment Agency | Policy 53 Local Environmental Impacts | | | | <p>4. Land Contamination Part M of Policy 53. Local Environmental impacts 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. 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>5. Waste Part I of Policy 53. Local Environmental impacts 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. 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> | | <p>The Council's response to the EA's comment on the Regulation 18 Plan (comment 1105) was that an amendment was made to the supporting text to clarify that agent of change relates to nuisance-generating uses (at paragraph 25.32 in the Plan), and not exclusively those that are noise-related. The rest of the policy was deemed sufficient to address the EA's concerns, whilst it was noted that the EA would be a statutory consultee as part of the planning process where proposed development was located near to safeguarded waste sites. No further amendments considered necessary.</p> |
| - | | | | | | Policy 54 Basements and Subterranean Developments – no comments received | | |
| - | | | | | | Policy 55 Delivery and Monitoring | | |
| 555 | Andrew Hunt, HUDU in consultation with | 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. We have formulated this response in consultation with NHS South West London's Integrated Care Board (ICB).</p> | | Resubmission of comment to the Regulation 18 Local Plan consultation (CCG comment 1115 on the Regulation 18 Plan) regarding reference in the policy to health or social infrastructure noted. A reference |

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| | South West London Integrated Care Board | | | | | | <p>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> | | to the Planning Obligations SPD was added to paragraph 26.22 of the supporting text. It was not considered necessary to cross-reference to all the policies in the Plan which may require a planning obligation, as these are made clear in relevant policies across the Plan and will vary significantly depending on the type of development. An update to the IDP is included as a submission document, incorporating input from HUDU. |
| 556 | Jon Rowles | Policy 55 Delivery and Monitoring | | | | | - 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. | | Comments noted. See the Monitoring Framework which indicates how policies in the Local Plan will be monitored. |
| 557 | Mark Jopling, Udney Park Playing Fields Trust | Policy 55 Delivery and Monitoring | | | | | 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. | | Comments noted. The Council's Planning Enforcement Policy is referred to in part F of Policy 55, which sets out the Council's approach to enforcement matters. Policy 29 Designated heritage assets appropriately deals with enforcement matters for heritage assets. |
| 558 | Katherine Drew, The Royal Parks | Policy 55 Delivery and monitoring | | | | | 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 Council's Statement of Consultation (June 2023) 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] | | Resubmission of comments to Regulation 18 Plan noted. The supporting text sets out the details around the approach that the Council will take to planning obligations, whilst an Infrastructure Funding Statement is published each year. |
| 559 | Louise Fluker, The Richmond Society | Implementation of the Local Plan, Paragraph 26.5 | Yes | No | Yes | Effective | 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. | Council will need to develop policies which relate to retrofitting whether insulation, heat systems or water collection | Comments noted. Impacts on existing buildings are referenced in policies throughout the Plan – for example, 'Policy 14 Loss of Housing' and 'Policy 23 Offices' both state that existing buildings should be retained, whilst Policy 46 Amenity and Living Conditions covers the impacts on existing properties from new development. 'Policy 3 Tackling the climate emergency' and 'Policy 7 Waste and the circular economy' both encourage retrofit of existing buildings. As paragraph 26.5 contains general reference to measures, no changes are considered necessary. |
| 560 | Peter Thompson, National Physical Laboratory (NPL) | Implementation, Delivery and Monitoring, Paragraph 26.5 | Yes | Yes | Yes | | Likewise, for Policy 26 Implementation, Delivery and Monitoring section 26.5 "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. | | Comments noted. |
| 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,</p> | | The Infrastructure Delivery Plan (IDP) (2023) was published alongside the Regulation 19 Plan as part of the evidence base to inform the Plan. The Council's Transport Background Topic Paper concludes that development proposed arising from the policies within the Plan is unlikely to have a material, strategic impact on the public transport system or highway network, see also response to comment 523. |

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| | | | | | | 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. 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. | | |
| 562 | Julie Scurr | Delivery through the planning process | | | | 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. The above is all very cynical so maybe it's time for me to move 😞 | | Comments noted. |
| 563 | Jon Rowles | Infrastructure Delivery Plan | | | | - 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 collect contributions towards infrastructure needed to support them. Such as the proposed foot and cycle bridge across the river between Ham and Twickenham. | | Comments noted. The IDP is intended to serve as a snapshot in time and will be reviewed (and updated if necessary) regularly. An update is included as a submission document. |
| - | Zoe Chick, River Thames Scheme | 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 | Justified | [See comment 505 in relation to impact on local infrastructure] | | - |
| - | Tom Wignall (Avison Young), National Gas | Infrastructure - utilities | | | | [See comment 423 in relation to gas distribution] | | - |
| - | Tom Wignall (Avison Young), National Grid Electricity Transmission | Infrastructure - utilities | | | | [See comment 424 in relation to energy distribution] | | - |
| - | David Wilson, Thames Water | 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] | | - |
| - | | | | | | Glossary | | |
| - | Matthew Pigott (Avison Young), Star Land Realty | Glossary | | | | [See comment 374 in relation to including definition of care home accommodation] | | |
| - | | | | | | Appendices | | |
| - | | | | | | Appendix 1 Maps of Proposed Town Centre Boundaries and Primary Shopping Areas, and Local Centre Boundaries – no comments received | | |
| - | | | | | | Appendix 2 Marketing Requirements | | |
| 564 | Philip Villars, PMV Planning Limited on behalf of | Appendix 2. Table 28.1 Marketing Requirements | | N | | <u>Appendix 2 Marketing Requirements</u> 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. | | Comment noted. The two-year marketing period for industrial land is considered appropriate given local evidence and circumstances. As stated in paragraph 19.30 of the |

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| | owner of Arlington Works | | | | | | | | The supporting text to London Plan Policy E7 (paragraph 7.7.5) states the following: <i>"Evidence to demonstrate 'no reasonable prospect' of Non-Designated Industrial Sites being used for industrial and related purposes should include:</i> <ul style="list-style-type: none"> <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> 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. | | Publication Local Plan, the Employment Land & Premises Needs Assessment identifies a minimum (net additional) requirement for 60,000sqm of industrial floorspace for the forecast period 2019-39 and notes that vacancy rates are now 0.5%, well below the London average for industrial land, which is critical for the borough as this means we do not have available capacity for future industrial demand. |
| 565 | Tim Humphries (Firstplan), William Grant & Sons Ltd | Appendix 2 Marketing Requirements, Paragraphs 28.10 & 28.12 | | | | | | | [See also comment 410 on Policy 23] 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: "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" (Our underlining) 5.23 The requirements of offices are outlined at Paragraph 28.9; however, Paragraph 28.10 then goes on to state that: "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" . 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. | Appendix 2 Paragraph 28.10 "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. an exception to policy; there should be no net loss of office floorspace." Paragraph 28.12 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. | Please see the Council's response to comment 410. |
| - | Gerard Manley (Firstplan), Baden Prop Limited | | | | | | | | [See comment 411 in relation to Policy 23 and paragraph 28.10] | | - |
| - | Jo Edwards, Sport England | | | | | | | | [See comment 544 in relation to marketing requirements and sport and recreation facilities] | | - |
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| - | | | | | | | | | Note comments on the St Clare (Hampton Hill) Mid-rise Zone have been collated against the Place based strategy for Hampton & Hampton Hill to group with similar comments. | | - |
| - | | | | | | | | | Note comments on the Teddington Mid-rise Zone have been collated against the Place-based Strategy for Teddington & Hampton Wick to group with similar comments. | | - |
| - | Katie Sullivan | St Clare mid-rise zone | | N | N | o | o | 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 | o | o | 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. | See response to comment 89. |
| - | Gary Hageen | St Clare mid-rise zone | | N | N | o | o | Positively Prepared ; Justified | [See comment 87 in relation to the St Clare mid-rise zone] | | - |
| - | Alison Barker | St Clare mid-rise zone | | N | N | o | o | Positively Prepared ; Justified | [See comment 88 in relation to the St Clare mid-rise zone] | | - |

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| - | 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] | | - | |
| - | | | | | | | Appendix 4: Review of Sites of Importance for Nature Conservation | | | |
| 567 | Prabhat Kumar | Appendix 4 – Sites of Importance for Nature Conservation (SINC) - RIB25 Ham Common west | N | N | N | o | 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. 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. | 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. | Comments noted. The designation of important priority habitats is not considered incompatible with continuing existing uses, and prior to any changes to management there would be consultation. |
| 568 | Emma Penson (DWD), Dukes Education Group and Radnor House School | Appendix 4 – Sites of Importance for Nature Conservation (SINC) – Kneller Hall | N | N | N | o | Positively Prepared ; Justified; Effective; Consistent with national policy | Representations to Appendix 4 – Sites of Importance for Nature Conservation (SINC) 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. 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. | | Comments noted. The boundary of the nature conservation designation does not need to match ownership – the area to the east was always identified in the Kneller Hall SPD as a potential habitat corridor. The former use of the playing fields by the MoD was not at intensive as school standards, and the acid grassland has persisted despite previous use. There are ongoing site-specific discussions (22/3004/FUL, 22/3005/LBC) to consider the tensions between sport and the biodiversity value of the site, while also considering MOL impacts and Sport England requirements. However, an Additional Modification could be considered for clarity to ensure the vision references correctly the SINC designation and the need to protect the ecological value of the SINC in accordance with Policy 39. Overall it is considered that Site Allocation 21 sets out an appropriate vision for the |

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| | | | | | <p>Kneller Hall</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. Furthermore, we disagree with the statement on page 72 of Salix Ecology's Volume 2 (November 2022) that states that <i>"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."</i> 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> | assessment of site-specific proposals, see also response to comment 226. |
| - | David Wilson, Thames Water | | | | [See comment 492 in relation to M085 Hampton Water Treatment Works and Reservoirs Nature Conservation Designation] | See response to comment 492. |
| - | Geoff Bond, Ham & Petersham Association & Amenities Group | | | | [See comment 230 in relation to protection of sites in Ham] | See response to comment 567. |
| 569 | Katherine Drew, The Royal Parks | Review of Sites of Importance for Nature Conservation in | | | 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 Council's Statement of Consultation (June 2023) Appendix 3G for the schedule of Regulation 18 responses and officer comments - comment 1131 in relation to the review of | The Council's response to the Royal Park's comment on the Regulation 18 Plan (comment 1131) confirmed the designation for Richmond Park and Associated Areas did not preclude existing areas with a car park and driving range. |

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| | | Richmond upon Thames | | | | | SINCs and specific sites - M082 Richmond Park and Associated Areas, M084 Bushy Park and Home Park, and RiB06 Longford River in Richmond] | | | The comments on Bushy Park and Home Park and the Longford River in Richmond designations were not objecting to these proposals. Therefore no amendments considered necessary. |
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