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24 July 2023

The Local Plan Team
LB Richmond upon Thames
Civic Centre
44 York Street
Twickenham TW1 3BZ

Dear Sir/Madam

Publication Local Plan

Thank you for your notice of 9 June launching this document. We note your comment that *“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.”*

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.

In terms of the ‘soundness’ we note your four different tests on this (below in italics) and our comments are as follows:

The Local Plan has to be:

- *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.*

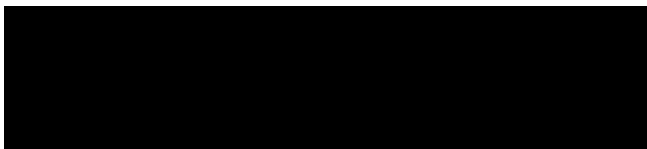
We agree with the strategy but would have expected it to lead directly to the policies and finally to the planning guidelines for the major development sites (the site allocations), this being the usual structure of all plans till now. However, the strategy instead leads to local strategies and thence 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.

- *Justified - It is based on an appropriate strategy, taking into account the reasonable alternatives, and is based on proportionate evidence.*
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.
- *Effective - It is deliverable over the plan period, and is based on effective joint working on cross-boundary strategic matters.*
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.
- *Consistent with national policy - to enable the delivery of sustainable development.*
We note that in para 2.4 "the Council will ensure that planning applications that accord with policies in the adopted Local Plan and the London Plan will be approved." However, we are much concerned that some planning applications that do not accord with such policies are nevertheless being approved on the basis that "the benefits outweigh the harms." The Local Plan does not – and ought to – provide an explanation of how such benefits and harms are measured. We have come across this problem several times in recent years, notably with the Homebase development on the edge of our area (SA29) which the Council refused but the Mayor is minded to approve, and with the Stag Brewery development (SA35) which the Council has approved and the Mayor in the past has refused.

We hope these comments are helpful.

We are grateful also for the responses you have made to all our comments at the Pre-publication stage. We accept most of your responses but there are a number that we do not agree with (see attached) and we will be raising these matters at the Inspectorate's Examination in Public.

With best regards



Tim Catchpole, Chair

Remaining points of disagreement

Policy 2. Spatial Strategy: managing change in the borough (strategic).

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.

Site allocation 34: The Stag Brewery

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.

Theme: Responding to the climate emergency and taking action (Policies 3-9)

No comments on your responses.

Theme: Delivering new homes and an affordable borough for all (Policies 10-16)

No comments on your responses.

Theme: Shaping and supporting our town and local centres (Policies 17-20)

No comments on your responses.

Theme: Increasing jobs and helping business to grow (Policies 21-27)

Policy 27. Telecommunications and digital infrastructure

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.

Theme: Protecting what is special and improving our areas (Policies 28-33)

Policy 28. Local character and design quality

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.

Policy 31. Views and vistas

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.

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 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.

Theme: Improving design, delivering beautiful buildings and high quality places (Policies 44-46)

Policy 44. Design Process

Policy 45. Tall and Mid-rise building zones

Policy 46. Amenity and living conditions

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.

Theme: Reducing the need to travel and improving the choices for more sustainable travel (Policies 47-48)

Policy 47. Sustainable travel choices

We note your reference to the TfL modelling. Our concern is that it seems to be shrouded in secrecy. The roads through our area appear to be carrying much extraneous traffic on orbital journeys because the same orbital movement of public transport is clearly inadequate. When did TfL last undertake an O&D survey on the South Circular Road in our area? And does their model take note of this?

We note your comment about possible highway safety issues around Mortlake Station and the need for a financial contribution from developers towards improvements. The proposed improvements are cosmetic. We have just recently heard Network Rail's announcement about installing lifts at Barnes Station despite there being no major developments in that area, but they have no such plans

for either Mortlake Station (next to the Sheen Lane level crossing) nor North Sheen Station (next to the Manor Road level crossing) where developments are proposed respectively on the Brewery and Homebase sites. Why is this?

We also note your response to our comment about motorists making long journeys to get fuel and we are pleased to see that you have inserted a new paragraph to cover this point.

Theme: Securing new social and community infrastructure to support a growing population (Policies 49-50)

No comments.

Theme: Creating safe, healthy and inclusive communities (Policies 51-54)

No comments on your responses.