

Local Plan Publication Consultation

From 4 January to 15 February 2017

REPRESENTATION FORM

The Publication Local Plan ('the Plan') sets out a 15-year strategic vision, objectives and the spatial strategy for the borough as well as the planning policies that will guide future development in the borough. It looks ahead to 2033 and identifies where the main developments will take place, and how places within the borough will change, or be protected from change. The Plan also allocates and designates sites/areas that are considered to assist with the delivery of the vision and strategy of the Plan.

This is the final representations stage before the documents are submitted to the Secretary of State for independent Examination in Public. **At this stage your comments should relate to issues of legal and procedural compliance, the "soundness" of the Plan and the "Duty to Co-operate"**. There are accompanying guidance notes which can be downloaded from the [Council's website](http://www.richmond.gov.uk/councilswebsite) at www.richmond.gov.uk/local_plan/local_plan_review

How to respond

Please read the consultation documents, which include the Publication Local Plan, the Proposals Map changes and the Sustainability Appraisal, as well as other background information on the [Local Plan website](http://www.richmond.gov.uk/local_plan/local_plan_review) at www.richmond.gov.uk/local_plan/local_plan_review

You can respond to the consultation documents in the following ways:

- **Online** at www.richmond.gov.uk/local_plan/local_plan_review, where you can find a link to our **online consultation portal** and online representation form.
- **Email** your completed representation form to LocalPlan@richmond.gov.uk (A PDF and a Word version of the form can be found on the website via the above link). The 'Word' version allows you to type in your response, which can then be emailed.
- **Send** the form to Local Plan Team, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ; or **hand-deliver** it to the ground floor reception in the Civic Centre.

We would prefer all comments to be made electronically, ideally through the online consultation portal. This is also the quickest and easiest way of responding.

All representations, which will be made publicly available, must be received **by 5pm on 15 February 2017**.

This form has two parts:

- Part A – Personal details and about you
- Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A: Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title	Mr	
First name	Rob	
Last name	Gray	
Job title (where relevant)	Chair	
Organisation (where relevant)	FORCE	
Address	C/O SWLEN 13 Rosslyn Rd, Twickenham TW1 2AR	
Postcode	TW1 2AR	
Telephone		
Fax		
E-mail address	info@force.org.uk	

Data protection

Information provided in this form will be used fairly and lawfully and the Council will not knowingly do anything which may lead to a breach of the Data Protection Act 1998.

All responses will be held by the London Borough of Richmond upon Thames. They will be handled in accordance with the Data Protection Act 1998. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

For further details regarding your privacy please see the Council's information published at:
www.richmond.gov.uk/data_protection

Part B: Your Representation(s)

Name or Organisation:

3. To which part of the Local Plan does your representation relate to?

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

Documents		Sections
Publication Local Plan	<input checked="" type="checkbox"/>	Page number(s)
		Paragraph number(s)
		Policy no./name
		Site Allocation no./ name
		Map(s)
		Table(s)
Local Plan Proposals Map Changes	<input checked="" type="checkbox"/>	Page number(s)
		Site name
		Map(s)
		Table(s)
Sustainability Appraisal Report	<input type="checkbox"/>	Page number(s)
		Paragraph number(s)
		Table(s)
Other (for example an omission or alternative approach)	<input type="checkbox"/>	

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes <input type="checkbox"/>	No <input type="checkbox"/>
4.(2) Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.(3) Complies with the Duty to Co-operate	Yes <input type="checkbox"/>	No <input type="checkbox"/>

If you have entered 'No' to 4.(2), please continue with Q5. In all other circumstances, please go to Q6.

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

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

6. Please give details of why you consider the Local Plan is or is not legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

FORCE largely supports the proposals within the Local Plan.

FORCE strongly supports the proposals in the Local Plan Proposals Map Changes, to include the Rifle Club, Mereway Nature Park and Meadway Orchard as Other Sites of Nature Importance. It is not clear whether these sites would be incorporated into the existing Lower Crane Valley Metropolitan SINC. FORCE would be very supportive of this incorporation, bringing these sites into an enlarged Lower Crane Valley MSINC

FORCE would like to register the following concerns regarding the effectiveness of the Local Plan:

Section 5. Green Infrastructure. FORCE broadly supports the proposals regarding Green Infrastructure.

FORCE considers that one fundamental value of Green Infrastructure is its capacity for providing social and health benefits to the local population. In our view this benefit is not sufficiently referenced in the Plan - including cross references to other relevant parts of the Plan.

In addition, in our view Friends Groups have a key role in delivering the protections and enhancements to the Green Infrastructure set out in the Plan. There are some 70 open space friends groups already operating in the borough and they provide a key interface between the open spaces, the council and the local community. The role of Friends Groups in delivering improvements, raising funds and engaging local communities is not referenced sufficiently in the plan and nor is there any policy support to underpin this role in the plan.

These two key aspects are well understood at a national and regional policy level and are well demonstrated by ongoing activities at a local level. In our view these key aspects require Local Plan policy statements to support them.

LP18: FORCE broadly supports the proposals in LP18.

However, FORCE considers that the proposals need to better reflect the following issues and opportunities:

LP 18 - considers river corridors and sets out an expectation that proposed developments adjacent to all river corridors "contribute to improvements and enhancements to the river environment." However, 5.7.4 regarding the River Crane corridor says; "when appropriate", regarding the requirement for development to contribute.

SA9, SA10 and SA11. When considering these individual sites adjacent to the Crane and the DNR, the policy states that; "Any development proposal is required to protect, and, where possible, enhance the River Crane corridor.

SA12 contains no stipulations for the River Crane despite the large length of river frontage.

In our view the words "when appropriate" and "where possible" significantly dilute the requirements of LP18 when applied to the River Crane and those sites along it that are likely to be subject to development. SA12 clearly fits the requirements of LP18 as a development adjacent to a river corridor and the requirements need to reflect this.

Section 5.7.4 states; "continuous accessible link between Hounslow Heath and Twickenham Station (which is now largely realised)". FORCE would note:

1. There have been positive steps towards realising this ambition - but it is not correct to say it has been largely realised

2. The ambition, set out by FORCE and embraced by the Crane Valley Partnership of which LB Richmond is a member, has also been enlarged to include the river downstream of Twickenham Station to the Thames. This includes the Tidal Crane (The Tidal Crane Association has been operating in this area for 40 years and is not referenced in the Local Plan) and encompassing plans for extensive river restoration works.

In our view the Local Plan needs to reference these plans to be effective in protecting and enhancing the river corridor.

FORCE notes that the original Council intention in the draft plan was to remove the Lower Crane Valley SPG from the Plan. We also note that Council response 180 to the Local plan consultation (setting out the response to our LP submission) states that the SPG for the River Crane will now be retained. However, we can see no reference to the SPG within the latest version of the Local plan and are concerned that it has not been retained within the Plan.

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

7. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test that you have identified at Q5 above. (Note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to demonstrate how and why your change(s) will make the Local Plan legally compliant or sound. Please put forward your suggested revised wording of any policy or text or any changes to the Proposals Map. Please be as precise as possible.

Local Plan Proposals Map Changes for the Rifle Club, Mereway Nature Park and Meadway Orchard. These new Other Sites of Nature Importance to be included as part of the Lower Crane Valley Metropolitan SINC.

Local Plan

5. Green Infrastructure

Reference the value of green infrastructure in providing social and health benefits to the local communities. Commit the council to supporting social and health benefits through the provision of good quality green infrastructure and promoting activities in these spaces that help to deliver these benefits.

Reference the importance of Friends groups to delivering good quality Green Infrastructure that supports and enhances the value of the local community. Commit the council to supporting the network of groups across the borough.

5.7.4 remove the words "when appropriate" regarding the requirement for development to contribute.

SA9, SA10 and SA11. Remove the words "where possible" from the sentence "Any development proposal is required to protect, and, where possible, enhance the River Crane corridor". If necessary replace these words with; "Is expected to".

SA12: add the words; "Any development proposal is required to protect and enhance the River Crane corridor".

Section 5.7.4: change the words; "continuous accessible link between Hounslow Heath and Twickenham Station (which is now largely realised)", to; "continuous accessible link between Hounslow Heath and the River Thames, incorporating river restoration works along the lower Crane. This work is being delivered by the Crane Valley Partnership, which includes LB Richmond, GLA, Environment Agency as well as FORCE and the Tidal Crane Association in its 26 members".

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

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change(s), as there will not normally be a subsequent opportunity to make further representations.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No , I do not wish to participate at the oral examination	<input type="checkbox"/>	Yes , I wish to participate at the oral examination	<input checked="" type="checkbox"/>
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Participation by FORCE is only necessary if the Inspector believes our participation to be of value with respect to the points we have raised - or any points raised by other parties in relation to the Crane valley or Duke of Northumberland's River

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents. Your contact details will be shared with the Programme Officer and Inspector for the purposes of the public examination.

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box, complete Part A: Personal Details of this form and return it to us as appropriate.	<input type="checkbox"/>
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Signature: <i>For electronic responses a typed signature is acceptable.</i>	Rob Gray	Date:	13 th February 2017
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