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Sent: 09 July 2023 12:06
To: Richmond Local Plan
Subject: Local Plan Publication (Regulation 19) Consultation 9 June to 24 July 2023 - Friends of Richmond Park

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The following representation is made on behalf of The Friends of Richmond Park (Charity number 1133201).

The representation is limited to the April 2023 version of the Habitat Regulations Assessment prepared by LUC, and relates to the assessment of air pollution on the Richmond Park Special Area of Conservation.

What the Assessment says

Paragraph 4.35 notes that air pollution from roads is unlikely to be significant beyond 200 metres.

At paragraph 4.38 LUC makes the assumption that only A roads and motorways (ie the 'primary road network') are likely to experience any significant increase in vehicle traffic as a result of development; all other roads are therefore ignored.

Paragraph 4.43 identifies the A307 (the Kingston to Richmond road) and the A308 (Kingston Hill) as being within 200 metres of the SAC.

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.

Comment

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 '*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*' - 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.

Regards

Max Lankester

Vice president, The Friends of Richmond Park

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