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From: John Sadler [REDACTED]
Sent: 13 July 2023 12:31
To: Richmond Local Plan
Subject: Richmond Local Plan (Regulation 19) Consultation
Attachments: CPRE comments Richmond LP Reg 19 July 2023 final.pdf

[REDACTED]

Hi there,

Please find attached CPRE London's response to the current Richmond Local Plan (Regulation 19) Consultation.

Many thanks and best wishes,

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By email to: LocalPlan@richmond.gov.uk

13 July 2023

Dear Sir/Madam,

Re: Richmond Local Plan (Regulation 19) Consultation

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.

Thank you for the opportunity to comment on this important consultation. We are delighted to see the commitment to protecting the borough's Green Belt and maintaining its current boundaries.¹ 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:

Metropolitan Open Land (MOL) De-designations

We strongly oppose the de-designation of MOL parcels comprising front gardens to residential properties along Hampton Court Road. This is part of the network of historical sites linked to Hampton Court Palace. The relationship between Hampton Court Palace and the buildings around the green is an important relationship which has been lost in many other places by incremental change. The MOL designation of the gardens has helped to maintain this historic 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.

20-minute neighbourhoods

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.

- 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.

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



- 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.**

Site Allocations

- Site Allocation 5: The Uxbridge Road Sainsbury. This should be a mixed-use development with no surface car parking which is an inefficient use of space and promotes car use.
- 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)
- 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.
- Site Allocation 24: Richmond Station. 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.

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

- 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.

Suggested Additional Site Allocations

There are a number of car parks in the borough that could be removed and replaced by mixed used developments. Examples include:

- 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.

/continued



- Waitrose, West Sheen. The supermarket and the adjacent council car park, library and GP practice are all in a space-inefficient layout.



- Tesco, Teddington: The council-owned surface car park at the rear is space inefficient.





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.

Policy 48 – 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.

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.

Policy 52 – Allotments and food growing spaces

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.

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'.

Thank you for the opportunity to provide comments on this important consultation.

Yours sincerely
John Sadler
Campaigns Officer, CPRE London