



London Borough of Richmond upon Thames

By email to [LocalPlan@richmond.gov.uk](mailto:LocalPlan@richmond.gov.uk)

3 April 2020

Dear Sirs,

### **Richmond upon Thames Local Plan Review Consultation**

CPRE London is a membership-based campaigning charity concerned with protecting and enhancing London's Green Belt, Metropolitan Open Land, parks, green spaces and green infrastructure, and achieving compact, green, urban communities to help prevent low-carbon sprawling development in the countryside.

Thank you for the opportunity to respond to this important consultation.

**Green Belt and MOL Sites which are designated with the strongest protection in planning policy should not be allocated for development. Releasing and developing protected land neither necessary nor desirable.** The Green Belt to the east of the borough is vital to ensure London does not sprawl into open countryside and so Londoners do not have to live with the devastating impact of urban sprawl i.e. high transport and energy costs, congestion and pollution.

MOL is a strategic asset for all of London not just Richmond upon Thames residents. Furthermore, it is vital to ensure Londoners have access to open space and as an ecological asset delivering ecosystem services like urban cooling and water management; as well as providing vital habitat for diverse species.

- Green Belt / MOL reviews should only be conducted to assess whether the land meets the purposes and should not be used as a way to identify land for development.
- Developments in Green Belt are high-carbon, car-dependent and rarely affordable (according to CPRE evidence).
- There are clear alternatives for locating development within the borough – please see Annex 1 where we have suggested a number of large sites which could be redeveloped for residential, commercial or mixed-use neighbourhoods.

### **Planning for low-carbon, car-free development within the urban footprint is essential**

- It is vital that all development is planned in such a way that people can live without private cars (since most housing in Richmond has car parking available, there is no need for new



housing to cater for private car-parking: new developments can have car club parking only and sustainable transport hubs with cycle parking, delivery hubs etc.).

- Richmond needs to meet the Mayor's Transport Strategy targets, tackle air pollution, the climate emergency and road danger and improve people's activity levels and health. It will not be able to do this unless it plans for car-free housing development.

**Surface and multi-storey car parks, along with low-rise retail sites, should be redeveloped to make more efficient use of space and discourage car trips.**

- Surface car parks are an inefficient use of space and encourage non-essential car journeys. In Annex 1 a number of sites are identified which could be redeveloped to find space for housing and commerce and at the same time reduce reliance on cars.
- These sites are viable and much more sustainable alternatives to Green Belt.

**The Local Plan must draw critical links to transport targets, and air quality and climate emergency action plans**

As transport is the largest emitter of Greenhouse Gas emissions the borough should encourage car-free/'lite' development as well as advocating a shift in travel behaviours to more sustainable modes of transport. The Local Plan should directly reference the borough's targets:

- To reduce car trips from 41% of all trips to 25% of all trips
- To increase the number of Richmond residents doing at least the 20 minutes of active travel they need to stay healthy each day, from 36% to 70%
- For 72% of the population to be 400m from the strategic cycle network (have access to a safe and pleasant cycle network)
- To reduce the number of people killed or seriously injured on Richmond's roads from around 70 per year to zero
- Additionally, to reduce car ownership, traffic volumes and air pollution, and to improve bus times, and for more people to be using public transport (targets in TfL's LIP3).

Thank you once again for the opportunity to respond to this important consultation.

Yours sincerely

Alice Roberts

Head of Green Space Campaigns

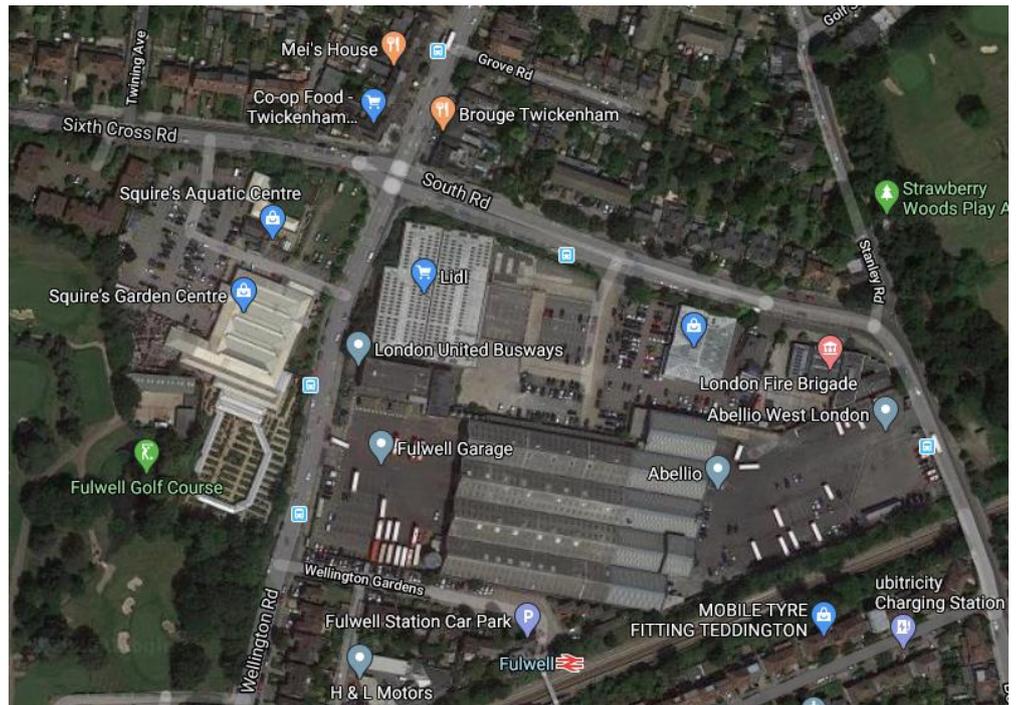
CPRE London



**ANNEX 1: appropriate sites for intensification for residential, commercial or mixed-use development**

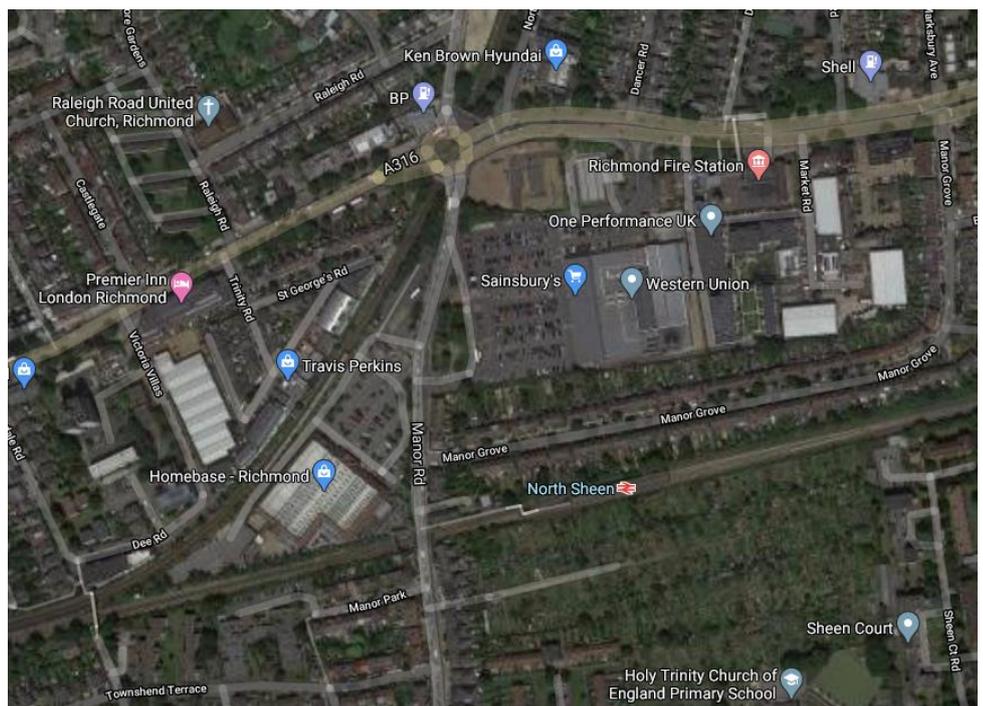
**Fulwell** - Sites around the Bus garage, including supermarket car parks, could be redeveloped to meet housing demand. The site has a PTAL rating of 3. Several bus stops surround the site. Fulwell Railway Station is adjacent. The site can be developed car-free (with car club parking provision only) to maximise use of space and accommodate people who don't have access to a car (including older people, younger people and those on low incomes).

There should be no development on any areas shown which are MOL or Green Belt.



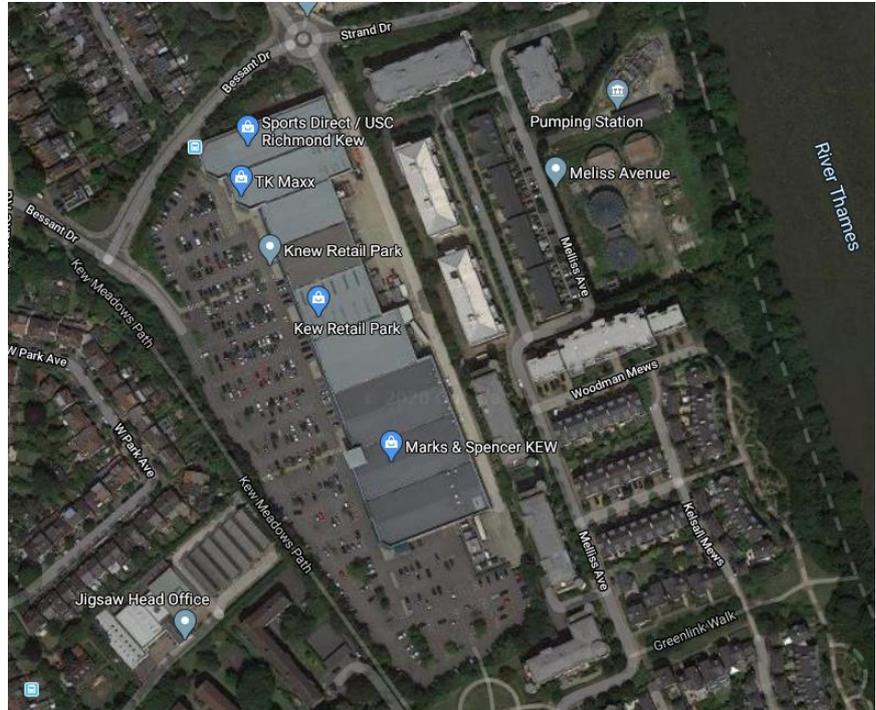
**North Sheen**

Near to North Sheen Station there are a number of large buildings and large open car parks for example, at Homebase and Sainsbury's near Manor Road. The site has a high PTAL rating of 5. The site can be redeveloped car-free to accommodate people who don't have access to a car.

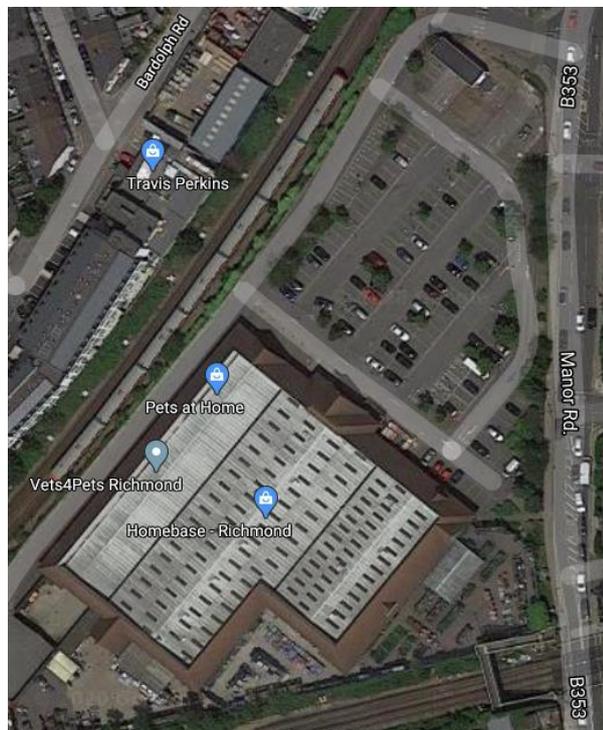




**Kew Retail Park** - This site could be re-developed to move away from car-dependent retail and /or reduce surface car parking (moving towards car club parking) to intensify the site for both residential and commercial space.



**Homebase North Sheen** - The car park and Homebase site at North Sheen can be intensified for mixed-use development





**Richmond Station** – car parking at Richmond Station could be replaced with commercial and/or retail development which would also serve to discourage car trips



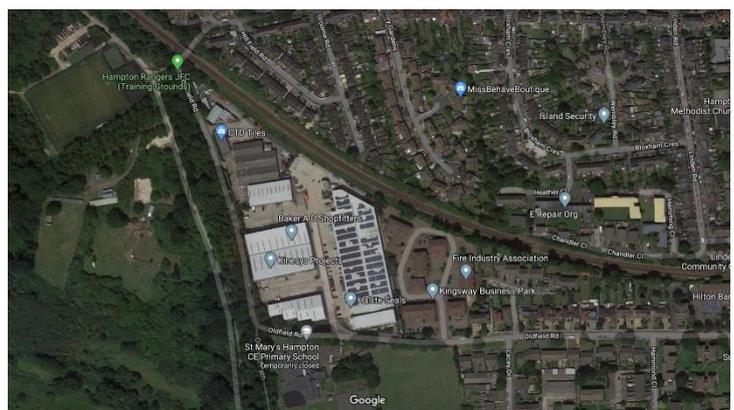
**Sainsbury’s Hampton**

This site is a concern because it ought never have been turned over to car park, being MOL as it is. In the circumstances, there could be a compromise which helps to reduce car dependency and increase housing in the borough, while returning some of the MOL back to green space (along the river, to support nature and wildlife). The low rise retail unit and part of the car park could be redeveloped for a new car-free, mixed-used neighbourhood while reducing car dependency, car-trips, pollution, congestion and road danger.



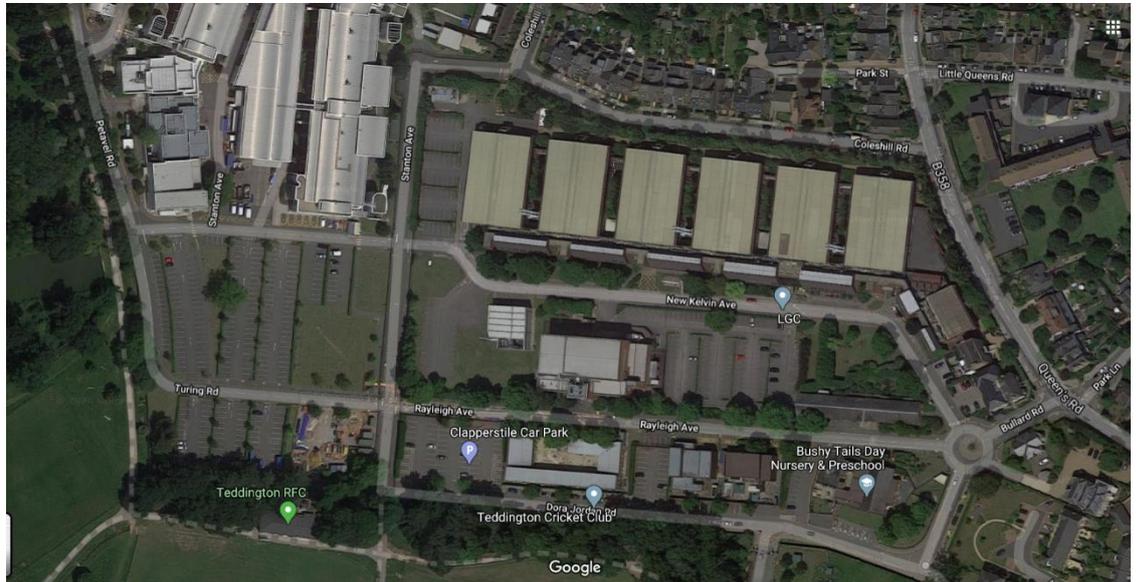
**Oldfield Road light industrial site**

This site could be intensified either for mixed use or to increase commercial space in the borough





**Stanton Avenue** –  
various surface  
car parks – space  
could be used to  
increase  
commercial space  
in the borough



**Lower Teddington Road**

There is also some space which could be better used, currently given to what appears to be garages and surface car park, in the area to the east of Lower Teddington Road, to the south of the railway line.

