

**The Mayor's draft The London Plan
Consultation**

**Response from the Richmond Society
2 March 2018**

INTRODUCTION

1. This is the written response of the Richmond Society to *the Mayor's draft London Plan*.
2. The Richmond Society represents over 1,000 members in Richmond town and its surrounding area. Our interests include the natural and built environments and the use of Richmond town. We are involved in planning and licensing matters.
3. We have an interest in many of the London Plan topics but focus here on two particular topics:
 - a. The evening economy.
 - b. Housing and land use.
4. We should mention that along with the neighbouring Kew Society and Friends of Richmond Green, our interests concerning Heathrow and associated environmental issues are dealt with through Richmond Heathrow Campaign (RHC) of which we are member. RHC is responding to the consultation on the London Plan with regard to the conflict between housing development and noise from Heathrow's flight paths. Last year RHC responded to the Mayor's consultation on draft Transport and Environmental Strategies in so far as they related to Heathrow. Transport and the Environment are important to our members and are included in the draft London Plan. But we believe last year's responses by RHC and the RHC response to the Mayor's consultation on the LEZ and ULEZ just closed cover the matters we wish to raise on these important subjects.

THE EVENING ECONOMY

5. Richmond town is described in the following multifaceted table, which we have compiled from the draft London Plan:

Richmond	Range and description applied to Richmond
Major town centre	Types of centre: International, metropolitan, major, district, local & neighbourhood. <i>International, Metropolitan and Major town centres should be the focus for the majority of higher order comparison goods retailing, whilst securing opportunities for higher density employment, leisure and residential development in a high quality environment.</i>
High commercial growth	Range: High, medium or low commercial growth <i>High: Likely to experience strategically significant levels of growth with strong demand and/or large-scale retail, leisure or office development in the pipeline and with existing or potential public transport capacity to accommodate it.</i>
Incremental residential growth	Range: High, medium or incremental residential growth
NT2 night economy	Range: NT1, 2 or 3 NT2: Regional or sub-regional significance
A and B classes Use	Commercial use

6. Policy HC6 (Supporting the night-time economy (page 294)) supports the Mayor's Vision for a 24

hour economy. The Richmond Society wholly rejects the idea that Richmond town should extend the hours of its evening economy. We believe this position is fully supported by the police and Richmond council. The position is also supported by the Local Plan and Richmond Village Plan.

7. Richmond council has adopted a Cumulative Impact Policy (under the provisions of the Licensing Act 2003) to prevent any increase in the town's capacity for provision of alcohol and to prevent any extension of the hours for supplying alcohol later in the evening or earlier in the morning. The Policy is also used to encourage earlier hours during the weekdays and on Sundays. Exceptions can and are occasionally made to the Policy when granting licences but applicants must demonstrate there would be no risk to the licensing objectives, which include prevention of public nuisance and crime and disorder. The police resources are few, given that during the day they have to deal with burglaries in the residential areas of Richmond and shop lifting and theft in the retail areas and then control the evening economy. In fact police resources are so thin that there is no police base in the town any longer.
8. Richmond town spatially is confined by the A316 and the historic Old Deer Park, by the river Thames and by the residential area leading up Richmond Hill. This small triangle combines retail, office, entertainment and residential uses in close proximity to each other. In addition there is open space such as Richmond Green, the riverside and its pocket gardens. Packed into this confined area are many cafes, restaurants, pubs, bars, take-aways and a night club. The concentration in terms of number per square metre of restaurants, pubs and bars is as high as that in parts of central London, such as Edgware Road, Soho and Covent Garden. This means that alcohol related anti-social behaviour permeates the town and especially its open spaces. It is impossible to avoid alcohol related boisterous behaviour from being anti-social and impacting residents and visitors occupying the same overall space.
9. The town is relatively unique in having had several professional independent observational studies of the evening economy and measurement of the alcohol related incidents. The Richmond Society itself has dealt with over 250 licence applications over the last 20 years. So there is a substantial evidence for our comments.
10. The level of alcohol related anti-social behaviour is too high and shows no sign of abating, although it does fluctuate seasonally and from year to year. It takes ourselves, the police, the council and residents a great deal of time and effort to keep some sort of balance between the provision of an evening economy that can be enjoyed by many while not harming the quality of life for residents and the enjoyment of visitors.
11. It is essential that residents have the opportunity for eight hours sleep but this is impossible with overhead arrival aircraft approaching Heathrow. Adding yet more disturbance from the intensification and extension of the evening economy would be wholly unacceptable to the residential community. There is increasing evidence of the harm to health caused by loss of sleep and stress from anti-social behaviour. Most of Richmond's licensed premises close between 11:30 and midnight and the Richmond Society, police and council have strongly resisted a lengthening of the hours for supply of alcohol, both in the evening and morning.
12. The town is well served by rail, underground and buses. But the service reduces considerably around midnight. Dispersal of up to 10,000 visitors on a summer's evening, for example, results in noise and anti-social behaviour. An extension of transport hours coupled with an extension of the evening economy hours would have a large adverse impact on residents.
13. Richmond has for many years attracted people from all over London to enjoy the river, open spaces and town. But changing the character into that of a "destination" would be retrograde in our view. Indeed it is the very diversity of the space in terms of its commercial, retail, entertainment and open spaces for relaxation that are the town's relative attraction compared

to other towns. Intensification of use such as extending use to a 24 hour night time economy would be seriously harmful to the town's character and to residents and visitors.

14. The evening economy can be commercially viable in its current state and does not necessarily need a 24 hour evening economy. There is an economic cost to the evening economy in terms of policing and council resources and burden on the NHS services. We calculated, albeit in around 2005, that Richmond's evening economy cost around £6 million a year in terms of extra resources, hospitalisation and lost productivity. This figure was based on Government estimates for England.
15. We welcome the recognition in the London Plan that each town is unique and that the local councils and local residential and commercial communities should decide on the future strategy for each town. It is important that the Mayor's London Plan does not over-ride the local management of Richmond town by promoting a wholly unwelcome 24 hour evening economy. We recommend the draft London Plan be amended so as not to fuel the idea of a 24 hour night time economy in residential towns such as Richmond.

HOUSING AND LAND USE

16. Table 4.1 of the draft London Plan sets out the ten-year targets for net housing completions which each local planning authority should plan for. Boroughs must include these targets in their Development Plan documents. Richmond has been designated a ten year target of 8,110 houses (811 per year) out of 649,350 housing completions for the 35 London boroughs.
17. The draft London Plan says that to achieve these London housing targets the overall average rate of housing delivery on both large and small sites will need to approximately double compared to current average completion rates.
18. We recognise the need and appreciate the Mayor giving thought to solving the problem of unsatisfied housing demand.
19. However, we are concerned that the requirement to build 811 houses a year in Richmond borough could lead to over development and loss of protected land in a borough which has a high proportion of green space of which much is protected.
20. We urge the Mayor not to force Richmond council to change the character of the borough through high rise flats, loss of open space and intensification of residential use in Richmond town. We appreciate better use could be made of brown field sites and other unused space but our understanding is that Richmond borough does not have the space to satisfy the Mayor's target.

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