Riverhill Yard SCI Statement of Community Involvement



Carefully designed tree storage and distribution facility on this derelict site



Safeguarding existing trees and protecting the openness of the MOL



Significant landscaping and a Biodiversity net gain



On behalf of Pines and Needles August 2023



Statement of Community Involvement - SCI

Contents

- 1. Introduction and Policy Framework
- 2. The Proposals
- 3. Our Consultation Process
- 4. Consultation Responses
- 5. Our response and continued consultation

Appendices



1. Introduction and Policy Framework

This Statement of Community Involvement has been compiled by specialist community consultation group Your Shout, part of Thorncliffe, on behalf of the applicant Pines and Needles. This report supports a planning application for proposals to redevelop the use of the Riverhill Yard as a Christmas tree nursery of plants and saplings, storage and distribution depot.

This report details the public consultation we have carried out to inform the evolution of the proposals, in accordance with national and regional policies, and Kingston Council's Statement of Community Involvement (SCI), adopted 2020.

The council particularly encourages developers of large or potentially controversial schemes to involve the local community prior to submitting a planning application. Such involvement should be carried out at an early stage enabling the views of the community to be taken on board. Early community involvement can be a way of resolving misunderstandings and tensions, which can arise in the progression of a new planning proposal. It can also help avoid public objections at a later stage.

The council also states that pre-application consultation should provide all groups and specialist interest groups, with an opportunity to participate in the evolution of development proposals.

The council encourage the results from this pre-application consultation to be reported as part of the submitted application so the council can understand how the community and other stakeholders have been involved (which is the reason for this document). The council state this report should indicate:

- The methods of consultation used to engage community participation, including hard to reach groups
- Who was consulted and the level of involvement
- The quantitative and qualitative findings of the consultation, and



• How matters raised in consultation were taken into account in the submitted development proposals.

The aims of the pre-application stage of public consultation are:

- To let local residents, businesses, councillors and other stakeholders know about the ideas for redevelopment on the site.
- To understand local views, engage with the community, help identify concerns and opportunities, and feed these in to the evolving proposals.
- To show how we have responded to the issues of the community and stakeholders, and how changes have been made to the proposals.
- To pledge our continuing commitment to engagement throughout the statutory consultation period and beyond.

We adhere to the Consultation Principles set out by successive governments through the Cabinet Office. Some of these principles are:

- Using plain English and avoiding jargon. Making the whole process clear and concise.
- Using the right tools, whether digital, collaborative, informative or ongoing. Only asking questions where we do not have a final view.
- Ensuring the affected people, groups and businesses are aware, targeted, and allowed proper time to respond. Making sure each group can access and respond to the consultation, however and using whatever means they engage with us.
- Early pre-application engagement and front-loading, where early engagement has significant potential to improve the efficiency and effectiveness of the process for all parties. We recognise that the more issues can be resolved at pre-application stage, the greater the benefits.
- Analysing and responding objectively and properly to consultations, published in writing and online through this document, and by direct contact if possible. Responses will be published where possible, with due regard to GDPR regulations.



This SCI deals with the public consultation, the consultation with neighbouring residents and community groups. Details of engagement with statutory and non-statutory consultees, whose engagement are being led by the team's planning consultant, are contained in other reports submitted as part of this planning application.

As part of this consultation, we have engaged with councillors. The Localism Act makes it clear that it is proper for councillors to play an active part in discussions on developments prior to submission of a planning application, so better to represent their constituents and influence the development proposed.



Statement of Community Involvement - SCI

2. The Proposals



The site (above)

Pines and Needles, the premier Christmas Tree growers and retailers, are applying for retrospective planning for its use of the Riverhill Yard as a Christmas tree nursery of plants and saplings, storage and distribution depot.

They are seeking to use the site for the growing of Christmas tree saplings, and the storage and distribution of Christmas trees, with some offices and a workshop within the western and northern portions of the site. There will be space set out for HGVs and vans loading and unloading on the site. There are also 14 cycle spaces.

They will be removing the existing bund along the western boundary and extending the bund along the northern boundary. They will also be putting in significant landscaping to protect the openness of the MOL, and urban greening as a fundamental element of the site design.

The nature of the site for the storage of Christmas trees provides a forestrylike appearance, which integrates with the MOL and the adjacent foliage. It improves the existing derelict hardstanding, as recommended by policy for this type of land.



- The site has previously been used as a garden centre, with a shop, car park and open display areas; the application for this was granted in 1996.
- In 2013, another application was granted for hardstanding, a compound fence, two steel containers, a diesel tank and two oil tanks, two office cabins, a perimeter bunding, storage, loading bay and 3 scaffolding racks.
- In 2014, an application was granted for a greenhouse structure.
- In 2015, a prior approval application was granted to convert some of the storage to a residential home.



3. Our Consultation Process

Your Shout has substantial experience in undertaking community engagement activities on behalf of developers in Kingston and elsewhere. We believe that our approach is inclusive, accessible and transparent. It also adheres to the council's consultation requirements and abides by the consultation principles set out earlier in this document.

Our approach uses an on-line engagement portal, alongside consultation events online promoted by a letter drop, and providing a Freepost address, Freephone number, and a bespoke email address to maximise the participation rate of local residents and businesses.

Our approach minimises the potential for pressure groups (for example) to dominate a meeting or monopolise the attention of members of the project team to the exclusion of less confident residents. Our channels of engagement remain beyond the consultation period, right up to the determination date at committee.

CONTACT WITH ELECTED REPRESENTATIVES AND COMMUNITY GROUPS

We contacted the following local elected representatives to brief them on the proposals, alert them to the forthcoming consultation and to offer a meeting to discuss the plans in more detail.

Old Malden Ward members, LB Kingston

- Cllr Mike Massimi
- Cllr Elizabeth Park

Cuddington ward members, Epsom Ewell Borough Council

- Cllr Graham Jones MBE
- Cllr Phil Neale
- Cllr Kim Spickett



We were notified of the Riverhill Residents' Association by councillors, and we have invited this group to a follow-up meeting.

We will continue to maintain contact with these individuals and groups as the planning application progresses.

Invitation letter

We publicised the consultation to the households and businesses surrounding the site, using GPS-tracked hand delivery distribute the information letter to 337 properties, as shown in the map below. The letter was delivered on 13 July 2023.



The company that hand-delivered the letter uses GPS to show their delivery – the map below shows this GPS report.



Statement of Community Involvement - SCI



There were 5 properties that were unable to be delivered, as below. We posted letters to these properties using Royal Mail.

- 1-27 Wells House
- The Powdermills
- Iris House
- River House
- 1-6 Riverhill Mews

The objective of the letter was to publicise the project website and consultation events, to communicate information about the scheme, and to encourage local residents to share their views about the proposal. The letter included a freephone number and freepost address, to increase accessibility in the consultation. A copy of this letter is available in the <u>appendix</u>.

Invitation letters were also sent to all the elected representatives and groups.



The communityUK platform for this project has a unique URL – <u>riverhillyard.site</u>.

Below is a screenshot of of the homepage of our website. Other pages are in the <u>appendix</u>.



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The consultation events

The consultation event was held on the communityUK platform, via a web browser, on Friday 21 July at 1pm.

We used the communityUK system, because it makes consultation events and information highly accessible, highly participatory, and gives residents equal access to the team.

It encourages and enables residents to share their views in an interactive and meaningful manner that helps influence decisions and creates trust. It is a far more accessible platform than using Zoom, and more residents participate in consultations.

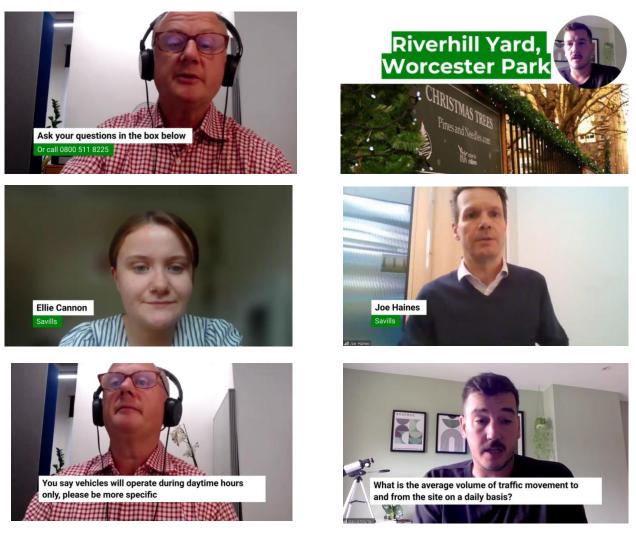
It's a platform that continues to be used extensively by local authorities.



The system is about reducing barriers to participation, for example for parents with children, professionals and other workers that find it easier to engage online or on their mobile. Indeed younger people find online events more attractive to attend. Allowing participants to create audio or video questions also reduces barriers for some people. There's also an option to watch on YouTube.

It's also helpful that the system allows recording of the events, with all the questions timestamped. Clicking on the question on the right of the screen enables you to watch the answer to the question on the video to the left of the screen. The events are recorded online at <u>https://riverhillyard.communityuk.site/watchit</u>

Registered participants were able to submit questions before or during the consultation events using a text-entry form on the event viewing page. They could also submit video questions and questions via a freephone number. Screenshots of the events are shown below:



The communityUK platform manages any residents with a lack of digital access. We send a hard copy of presentations to any who request them; we maintain our freephone helpline; and we accept requests for one-to-one meetings.

The time and date of the consultation event was chosen to encourage the maximum number of people to participate, including those in full-time employment and those with parental responsibilities. We ensured the date did not fall on any locally observed religious or cultural festivals.

Participants were able to register for the consultation event in advance. Registered participants were sent at least one reminder email ahead of their chosen event, and an email after the event to encourage participants to share their views. An example of one of these emails is shown in one of the appendices.

Representatives from the applicant and the consultant team were present throughout the consultation event.

Residents watched the live or recorded videos on 42 occasions, including on the website and the YouTube stream. 10 residents registered for the live events.

Response mechanisms

We have maintained, and continue to maintain, several response mechanisms for the local community and stakeholders to share their views about the scheme, including:

- A survey on the CommunityUK portal, which is now closed (previously on https://www.communityuk.site/shareviews)
- A freephone number, staffed during office hours: 0800 955 1042
- A consultation event hotline
- A bespoke email address: pinesandneedles@yourshout.org
- A freepost address: FREEPOST RTXU-JGSR-KHLE, Your Shout, 28 China Works, London, SE1 7SJ



All survey information was held in a GDPR-compliant format, with the following privacy notice published on the invitation letter and online portal:

Data will be held by Your Shout and the project team. By volunteering this information you are giving your consent for us to process your data regarding the Riverhill project. Your comments will be given to the council as part of the planning application process. You are also confirming you are aged 16 or over. You can withdraw consent for us to use your data at any time by emailing us at privacy@yourshout.com. You have a right to complain to the Information Commissioner's Office at any time if you feel there is a problem with the way we are handling your data.



4. Consultation Responses

Meetings/discussions were held (or are being held) with the following stakeholders, at the site:

- Councillor Mike Massimi, Friday 14th July at 3pm
- Councillors Phil Neale and Kim Spickett, 21st July at 4pm
- Riverhill Residents' Association being arranged, likely to be end of August

We had seventeen questions at the online consultation events (which are in the <u>appendix</u>).

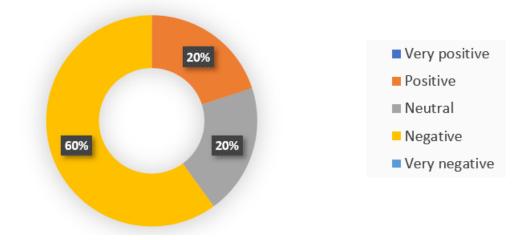
We have had five responses to the share your view survey, which is now closed.

Respondents were asked to self-identify themselves. They were told that they could select more than one option:



Are you a ...





Respondents were asked how they felt about the proposals:

Respondents were asked to give comments about the scheme. The issues they raised were as follows:

- Noise, timing of delivery and collection vans
- How trees will be cut?
- Safety of residents from HGVs, on the bridge, on Riverhill Way and going towards the site

The full comments are

I am concerned about the noise/timing of the vans/lorries arriving for collections, having bought a new residential home specifically for the peaceful location. I bought this property having specifically looking into any planning applications as there was previously only some allotments in this space. In addition, storage of machinery and lorries/vans will be an eyesore where previously this was just open land, particularly in the winter when the view from our homes (without foliage cover) will have this industrial view

We both asked, during the consultation online, how chipping /cutting machinery was to be powered. Is it from the supply coming in or from liquid fuel?



The impact of HGVs on the safety of the residents that I look after is my concern. This is a complicated and busy junction; the residents at Riverhill are retirees and the lane is the only access they have. There is a school sport facility that shares the access and three schools in the vicinity: Linden Bridge, Malden Parochial and Forest School. Old Malden Lane is our route to the station. There is no bus, so we walk and cycle. The crossing point at the foot of Old Malden Lane is on a bend. On dark winter mornings we travel to the station carrying flashlights. As much as this is a green business and I am truly positive about agriculture returning to the area I feel that heavy lorries in and out of a yard will contribute noise and pollutants that were not there before. If a yard for lorries can be found in the area and smaller vehicles used to transport trees from the farm to the lorries perhaps that could be a solution - although I would like to see a traffic study beforehand. Let's meet in person and see what can be achieved.

Old Malden Lane is a narrow and busy, some part of the lane has no pedestrian access or footpath. HGV access to your site will cause additional traffic. I will be against this proposal unless HGV access is restricted from old malden lane. Tree burning was happened at your site on Jan 2023, smoke and ashes have affected our environment negatively. What measures the management will enforce to avoid this happen again?



5. Our response and continued consultation

Issue	Applicant's response
Noise from tree cutting	Trees are cut in Scotland, not on site.
	At the end of the season, we chip remainder trees for biomass fuel – this will happen during acceptable daytime hours.
	We sometimes use chainsaws, and these tend to be electric.
Working hours	For the four week period during Christmas, we are likely to limit it to a six day week.
Retrospective planning	There is good reason to think the use of the site is lawful already, given the historic use of the site as a garden centre, the existing hard-standing etc.
	Much of the operation on the site will be the growing of saplings from seed, which is an agricultural and foresty use.
	In addition, the operational needs of the business, and the lack of available suitable sites, meant that Pine and Needles had to move in at this time, to ensure it can be ready for Christmas 2023.
Traffic and transport	For the majority of the year, the traffic will be very minimal.
	For the four week period, there will be up to 6 HGVs on site a day, that will take the route along Grafton Road. The temporary office units on the site came along this route.
	The vans will go down Worcester Park Road, given the corner on Worcester Park Road and our site road is safe for them to turn down.



	We are very keen not to cause disturbance, and want to find the best means of making this operation work. We are aware of the school, and we are looking at how to reduce impact on local residents, including hours of operation.
	We have two entrances for vehicles to the site, one for HGVs and one for vans. The site entrances and doors mean none will be able to wait on Riverhill Lane. The site entrances are very carefully planned to allow HGVs to wait before entering the site properly.
	We have the ability to control when HGVs and vans come to the site. There will be a plan in place to have holding points away from the site for HGVs until the site is ready.
Employment	We have 38 sites within London – any many locally. In addition, there are many roles on the site during the four to site week period before Christmas.
Fuel on site	We are very aware of fire hazard, and the limited fuel we have on site will be kept at the top of the site.
	We operate in the Royal Parks, and we have very strict regulations for fuel there, and these will be adhered to on this site as well.
Bridge	The bridge is strong enough to take vehicles to the site. There is a structural survey of the bridge.
Retail	The site is not for retail to consumers.
Sheds	The sheds will be brought back to site on small trucks, so will Worcester Park Road.
Neighbour	We are a good neighbour. If local residents have any concerns, they can speak to David Murrell, who is often on site.



Modern slavery	Everyone who works for Pines & Needles does so under a proper and legal contract and is paid at least the minimum wage.
Sewage and pollution	Measures are being taken to connect the site to the sewage network.
Wildflowers and landscaping	We pay rent to our landlord for the entire site, but much of the site is left as wild, including wildflowers to promote biodiversity.
Precedent for use of this site	A planning application will allow this type of business to operate on this site. It will not eradicate the MOL demarcation, or set any other precedent on the site.

Feeding back to participants and the wider community, and opportunities for continuing involvement

One of the main objectives of this Statement of Community Involvement is to help record individual and collective responses to the proposals and how these responses have affected our proposals.

This report also allows us to feed back this information, in a more readily digestible form to the local community, respondents, other stakeholders and councillors.

This Statement of Community Involvement will be made available, alongside other planning documents, as part of the planning submission to the planning authority.

We remain committed to keeping in touch with local groups, individuals and all those that have participated throughout this consultation exercise. The team will be available to meet consultees again as appropriate.



This Statement of Community Involvement fully demonstrates the applicant's commitment to thorough and meaningful public consultation and meets the requirements set out by the council. The submission of the planning application does not mark the end of this consultation and the team will continue to meet with local groups and individuals as appropriate throughout this process.

Your Shout 15 August 2023



Statement of Community Involvement - SCI

Appendices

Appendix: Public consultation – example invitation letter Appendix: Project website – screenshots Appendix: Consultation events – example reminder email Appendix: Online consultation events - list of questions submitted Appendix: Comments submitted by email



Statement of Community Involvement - SCI

Appendix: Public consultation - example invitation letter

12 July 2023

Dear resident

Pines and Needles, the premier Christmas Tree growers and retailers, is applying for retrospective planning for its use of the Riverhill Yard as a Christmas tree nursery of plants and saplings, storage and distribution depot.

Our carefully designed Christmas tree nursery of plants and saplings, storage and distribution facility will make the most of an underused derelict site, provide jobs, safeguard trees and protect the openness of the Metropolitan Open Land.

We have significant landscaping proposed, that will maximise Urban Greening Factor and Biodiversity Net Gain.

We will be holding a consultation event online on Friday 21 July at 1pm. We will be using the communityUK consultation portal, on our website.

To attend the consultation event, it's best to register on our website. Either scan the QR code, or go to our website at **riverhillyard.site**

You can also contact us by phone, email, or post:

- Freepost RTXU-JGSR-KHLE, Your Shout (Pines and Needles), 28 China Works, SE1 7SJ
- Call us on 0800 955 1042
- Email us at pinesandneedles@yourshout.org

You can also share your view about our proposals on our website. The survey will close on Thursday 27 July.

We are looking forward to hearing from you.

Your Shout, Pines and Needles consultation team

Sent by Your Shout, 100 Black Prince Road SE1 7SJ. Data will be held by Your Shout and the project team. By volunteering this information, you are giving your consent for us to process your data regarding this project. You are also confirming you are aged 16 or over. You can withdraw consent for us to use your data at any time by emailing us at privacy@yourshout.com. You have a right to complain to the Information Commissioner's Office at any time if you feel there is a problem with the way we are handling your data

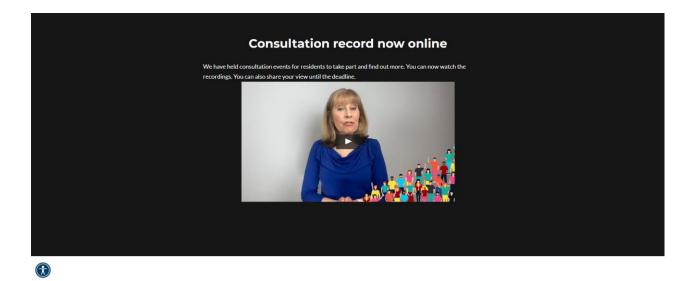






Statement of Community Involvement - SCI

Appendix: Project website - screenshots



Riverhill Yard

Homepage Watch it Explore Share your View 🛛 🖪 🖽 🔿



Tree storage for Pines and Needles

Pines and Needles, the premier Christmas Tree growers and retailers, is applying for retrospective planning for its use of the Riverhill Yard as a Christmas tree nursery of plants and saplings, storage and distribution depot.

Our carefully designed Christmas tree nursery of plants and saplings, storage and distribution facility will make the most of an underused derelict site, provide jobs, safeguard trees and protect the openness of the

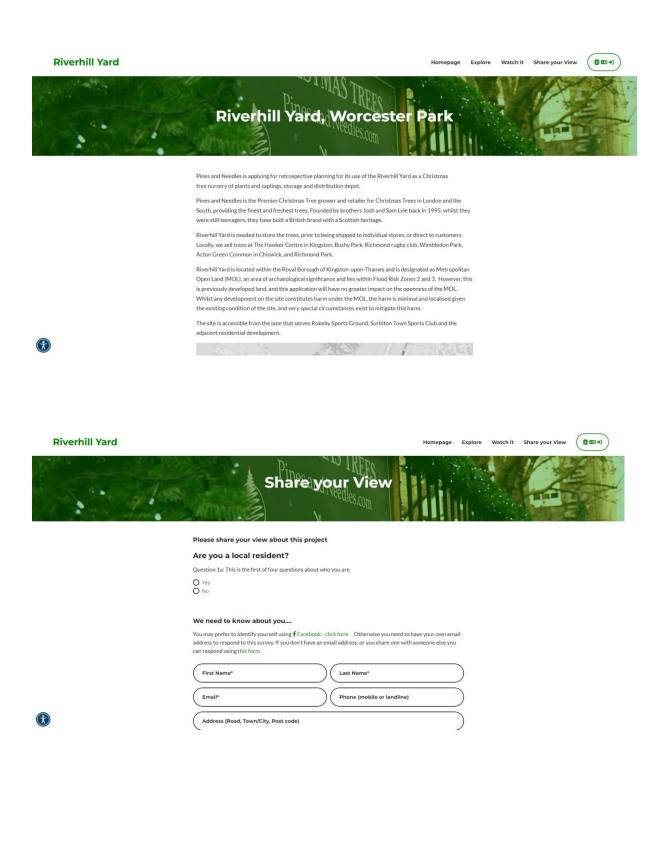
Metropolitan Open Land.

We have significant landscaping proposed, that will maximise Urban Greening Factor and Biodiversity Net Gain.





Statement of Community Involvement - SCI





Statement of Community Involvement - SCI

Appendix: Consultation events – example reminder email

communityUK
Dear Richard
Welcome to the consultation for Riverhill Yard.
Our online consultation events for residents continue this evening at 7pm. You can take part in the online events on the following https://riverhillyard.communityuk.site/registeredparticipant
The online event will last between 30 and 90 minutes, depending on how many questions we receive.
We will also livestream this event on our <u>YouTube channel</u> - search for communityUK on youtube (<u>here's a handy guide</u>). Use the <u>text-only</u> page to send questions. Today's YouTube <u>link is here</u> .
After the event, we will place the recordings on the website. Questions will be timestamped for ease of watching, and you'll be able to turn on auto-generated captions (subtitles).
We recommend you check your set up before the event starts. We start the livestream 15 minutes before each event so you can test your set-up in advance.
We hope you enjoy your experience of the communityUK platform. If you want to rate your experience about the platform, <u>click here</u> .
If you need any help, our event helpline is open 30 minutes before each event, on <u>0800 511 8225</u> .
We stream live on our website via Vimeo. If you have problems viewing the video, you can use our <u>YouTube stream</u> , or you may need to <u>update your</u> <u>browser.</u>
Regards
communityUK
communityUK · To stop receiving emails, <u>click here</u> .



Appendix: Online consultation events - list of questions submitted

How are the chipping/cutting machines powered please - supply of electricity coming in or by generator burning fuel Will this be a 7 day working week? What are the working hours for the site? So your chipping machines will have a supply of electric from supply coming in, or fuelled generators? How will the trees be cut for sale? The sheds will have to come back to site - so this is within the "in December" window? Residents live on site in static mob homes a lot of traffic goes to go cart clubhouse and homes elderly live on site ambulances come regularly if ur customers arrive early gates closed they will gueue then we cannot get in or out at end of lane as will be stuck in lane behind them it's happened slot while renevating site!! We have to get out of our cars and ask them to move Why are you going for retrospective planning? Can the larger vehicles and sheds not be stored somewhere else? Then smaller vehicles could ferry the trees to that site. Are combustibles being kept on site? Why can't Worcester Park Road be used? Has there been a condition survey done on the bridge? You say vehicles will operate during daytime hours only, please be more specific as the local school is a special needs school which relies mainly on private hire vehicles and minibuses which arrive from 0800 - 0930 and gather from 1500 - 16.30 for pick up You cannot exit the site Straight across into Cromwell Road. It is a right turn then an immediate left turn, which will be extremely difficult for an articulated lorry. Using Grafton Road will not go down well as it is wholly residential. At the crossroads is a school for children on the Autistic spectrum. How will you control the prevention of waste and toxic materials getting into the Hogsmill river Will there be opportunities for employment from the local area What is the average volume of traffic movement to and from the site on a daily basis, type and size of vehicle and hours of operation



Statement of Community Involvement - SCI

Appendix: Comments submitted by email

From Cllr Mike Massimi

Dear Richard

With my colleague, Councillor Park also cc'd on this email.

I want to thank you for inviting me to visit your site last week. The visit was informative, but it has raised a few queries which I am eager to have answered. Unfortunately, I was unable to attend the consultation event today, but I appreciate the effort made to include residents from the vicinity, most of whom are from the E&E ward. Despite having to maintain neutrality at this stage, I believe that such an approach is likely to contribute positively towards your retrospective planning application with Kingston Council.

Based on my understanding, Pine and Needle's primary business involves growing Christmas trees from saplings and distributing them locally and nationally from over a dozen sites, primarily operating during the Winter season. You've previously used other sites but had to look for a location within the M25 inner circle to facilitate logistical operations and site outreach. The Riverhill site seems perfect due to the large space and decent infrastructure it provides. I'm glad to note that your team has previous experience in this industry and there are no past negative feedbacks or concerns that I need to be aware of as a local councillor.

You indicated that due to time constraints, you chose to proceed with the lease for the site earlier this year before securing planning permission for this type of forestry business. The retrospective planning seems to be the only viable option for you to avoid disrupting the upcoming Christmas season. As I understand, given the primary nature of your business falls under forestry, the green belt protection might not be enforced to the same degree as for other types of activities. You're also planning to erect only temporary structures on the site.

During my visit, I expressed concerns about sewage and potential pollution due to any chemical or other byproducts from your business. You reassured me that measures were being taken to mitigate this, including the installation of septic tanks and potentially connecting to the existing sewage network across the Hogsmill using existing pipes from Riverhill. The latter seems more sustainable and reduces the risk of pollution, which I support.

Regarding the structural integrity of the Hogsmill bridge to withstand the weight of HGVs accessing the site, I would suggest seeking an expert's opinion to ensure its safety. I noticed that your team had cleaned up the previously vacant and somewhat squatted site, which I appreciate. The planting of wildflowers to promote biodiversity is commendable and I would encourage maintaining these practices. It would also be



beneficial for our biodiversity officers to visit occasionally to ensure these best practices are being upheld.

One of my primary concerns is the right of way and access to the Hogsmill. It appears that piles of soil and rubble have accumulated on the riverbank, which obstructs plans to restore the walkway along the Hogmill up to the River Club bridge. I propose that this pathway be reinstated to its original 1.5-meter width.

The site plan you presented showed various distribution centres, storage areas, and other design features. I do have a concern about the proposed loading bay's entrance on the right-hand side after the bridge. The narrow passage might pose a challenge for HGV drivers to navigate and reverse into the site or onto the main road. I'm interested to hear if there are other safer alternatives to this layout.

Additionally, I've noticed some caravans or mobile homes on site. While I'm unclear about the rules and regulations regarding these, it is crucial that any staff staying overnight do so safely and in accordance with the law. We've had cases of modern slavery in the past, so it's essential that these workers are treated fairly and their well-being ensured. It has been reported that someone might be sleeping in their vehicle overnight near your site, which is a concern.

Lastly, I cannot predict the outcome of a potential vote on your retrospective planning permission or whether it will be put before the full council, the Planning Committee, or the Neighbourhood Committee. I just hope that if permission is granted for your business on this green belt land, it does not set a precedent for future development after your lease expires.

I hope you understand my position and the fact that I must remain neutral at this stage until I have all the facts. Your collaboration with officers and other councillors, as well as your willingness to listen to residents' concerns, is much appreciated. Please let me know your thoughts about the points raised above.

Wishing you a good weekend.

Kind Regards,



Your Shout

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