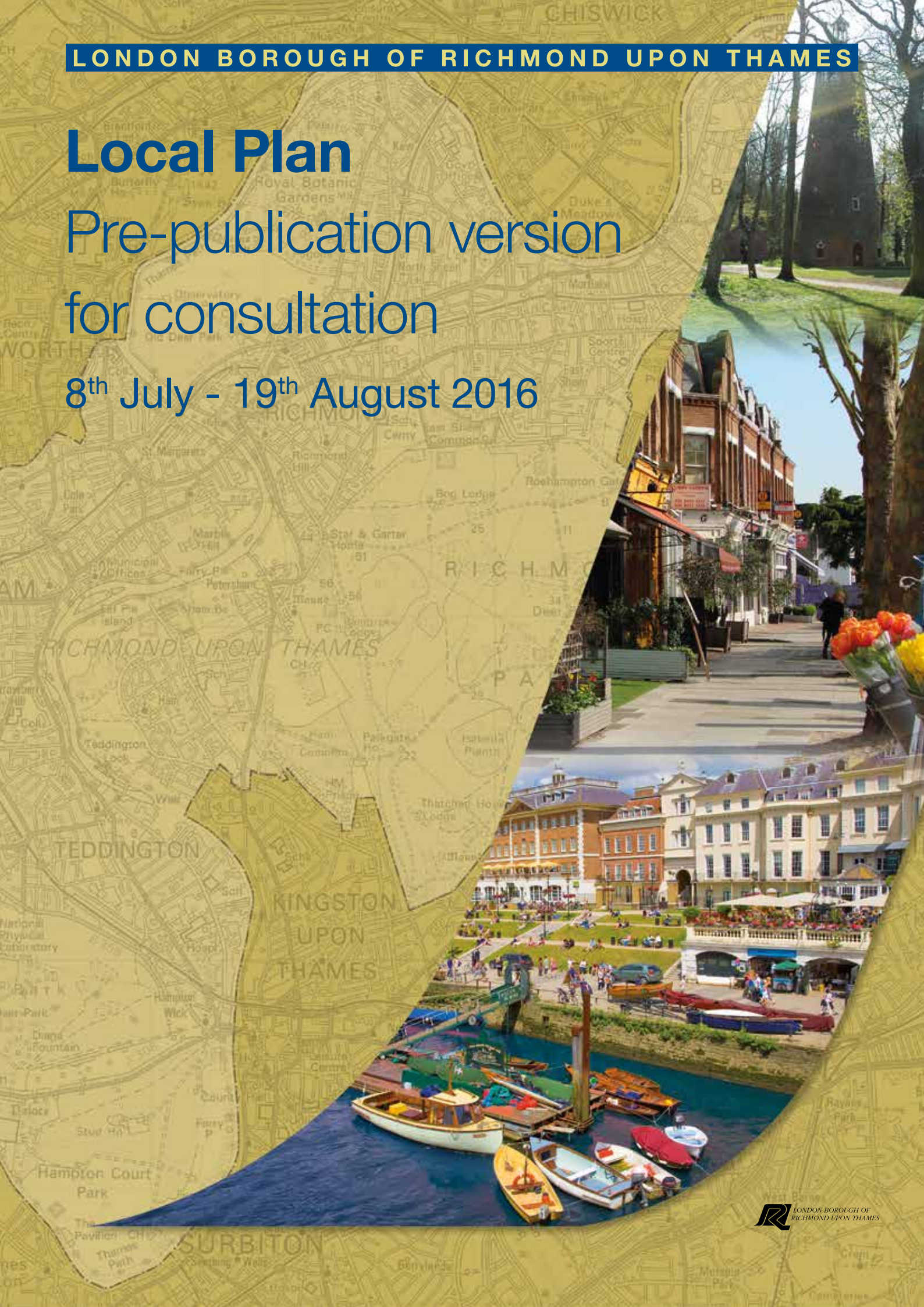


# Local Plan

Pre-publication version  
for consultation

8<sup>th</sup> July - 19<sup>th</sup> August 2016





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Nese keni veshtersi per te kuptuar kete botim, ju lutemi  
ejani ne recepcionin ne adresen e shenuar me poshte ku ne  
mund te organizojme perkthime nepermjet telefonit.

Albanian

إذا كانت لديك صعوبة في فهم هذا المنشور، فنرجو زيارة الإستقبال في  
العنوان المعطى أدناه حيث بإمكاننا أن نرتب لخدمة ترجمة شفوية  
هاتفية.

Arabic

এই প্রকাশনার অর্থ বুঝতে পারায় যদি আপনার কোন সমস্যা হয়, নিচে দেওয়া  
ঠিকানায় রিসেপশন-এ চলে আসুন যেখানে আমরা আপনাকে টেলিফোনে দোভাষীর  
সেবা প্রদানের ব্যবস্থা করতে পারবো।

Bengali

اگر در فهمیدن این نشریه مشکلی دارید لطفاً به میز پذیرش  
در آدرس قید شده در زیر مراجعه نمایید تا ترتیب ترجمه  
تلفنی برایتان فراهم آورده شود:

Farsi

જો તમને આ પુસ્તિકાની વિગતો સમજવામાં મુશ્કેલી પડતી હોય તો, કૃપયા  
નીચે જણાવેલ સ્થળના રિસેપ્શન પર આવો, જ્યાં અમે ટેલિફોન પર ગુજ  
રાતીમાં ઇન્ટરપ્રીટિંગ સેવાની ગોઠવણ કરી આપીશું.

Gujurati

ਜੇਕਰ ਤੁਹਾਨੂੰ ਇਸ ਪਰਚੇ ਨੂੰ ਸਮਝਣ ਵਿਚ ਮੁਸ਼ਕਲ ਪੇਸ਼ ਆਉਂਦੀ ਹੈ ਤਾਂ ਹੇਠਾਂ  
ਦਿੱਤੇ ਗਏ ਪਤੇ ਉੱਪਰ ਰਿਸੈਪਸ਼ਨ 'ਤੇ ਆਓ ਜਿੱਥੇ ਅਸੀਂ ਟੈਲੀਫੋਨ ਤੇ ਗੱਲਬਾਤ  
ਕਰਨ ਲਈ ਇੰਟਰਪ੍ਰੀਟਰ ਦਾ ਪ੍ਰਬੰਧ ਕਰ ਸਕਦੇ ਹਾਂ।

Punjabi

اگر آپ کو اس اشاعت کو سمجھنے میں کوئی مشکل ہے تو، براہ کرم نیچے دیے ہوئے ایڈریس کے استقبال پر جا کر ملیے، جہاں  
ہم آپ کیلئے ٹیلیفون انٹرپرائٹنگ سروس (ٹیلیفون پر ترجمانی کی سروس) کا انتظام کر سکتے ہیں۔

Urdu



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# Introduction 1

Pre-Publication Local Plan



# 1 Introduction

## 1.1 Setting the Scene

**1.1.1** The Council's Local Plan will set out policies and guidance for the development of the borough over the next 15 years. It looks ahead to 2033 and identifies where the main developments will take place, and how places within the borough will change, or be protected from change, over that period.

**1.1.2** The Council's Local Plan forms part of the development plan for the borough. It has to go through an Examination in Public by an independent Government inspector before it can be adopted by the Council. The London Plan, prepared by the Mayor of London, also forms part of the development plan, and the Council's Local Plan has to be in general conformity with it.

**1.1.3** The role of the development plan is to guide decision making on planning applications and inform investment in social and physical infrastructure. When planning applications are received, they are assessed against the development plan to see whether planning permission should be granted or not. The Planning and Compulsory Purchase Act 2004 requires that “in making any determination under the planning acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise”.

**1.1.4** The draft policies as set out in this Local Plan follow the approach of the presumption in favour of sustainable development and show how it is expressed locally. The Council will ensure that planning applications that accord with policies in the adopted Local Plan and the London Plan (and where relevant, with policies in the Ham and Petersham Neighbourhood Plan once adopted) will be approved without delay, unless material considerations indicate otherwise.

**1.1.5** The Local Plan is prepared within a hierarchical framework of planning policy for England. At the top of the hierarchy are the various Planning Acts, the National Planning Policy Framework (NPPF) and the

Planning Practice Guidance (PPG). Legislation requires that local authorities must take the NPPF into account when preparing their Local Plan. This means in practical terms that the Council should follow the guidance in national policy unless there is local evidence and circumstances that would justify a different approach.

**1.1.6** Below national policy sits the London Plan, which is prepared by the Mayor of London. Legislation requires the Local Plan to be in ‘general conformity’ with the London Plan. This means that the Local Plan should be in line with the London Plan, unless there is local evidence and circumstances that would justify a different approach. The London Plan forms part of the development plan for the borough and provides the spatial development strategy for Greater London.

**1.1.7** This draft Local Plan has been produced in line with the existing Planning Acts, national policy and guidance, including the NPPF and PPG, and the London Plan (including the 2015-16 Minor Alterations). In addition, other legislation, such as the Town and Country Planning General Permitted Development (Amendment) Order 2016, has been referred to. It is acknowledged that during the lifetime of this Plan, national policies, guidance and other legislation as well as a new London Plan will be published. Where this Plan refers to publications that are subsequently superseded by updated policies, guidance or changes to legislation, the updated context will be regarded as material considerations.

## 1.2 Existing Local Plan

**1.2.1** The existing Local Plan for the London Borough of Richmond upon Thames sets out how and where development in the borough will be delivered in the future and is currently made up of a series of documents, as shown in the table below. All existing Local Plan documents are available to view on the [Council's website](http://www.richmond.gov.uk/local_plan) at: [www.richmond.gov.uk/local\\_plan](http://www.richmond.gov.uk/local_plan).

Plan	Function	Status
Core Strategy	Vision and strategic policies	Adopted in April 2009
Development Management Plan	Detailed policies for the management of development	Adopted in November 2011
Twickenham Area Action Plan	Policies and proposals for central Twickenham	Adopted in July 2013
Joint West London Waste Plan	Planning for waste	Adopted in July 2015
Saved Unitary Development Plan	Saved site-specific proposals	Adopted in March 2005

**1.2.2** The Core Strategy outlines the Vision and Spatial Strategy for the borough and includes 20 core planning policies on matters including climate change, housing, employment and retailing. It provides the framework for the development of other Development Plan Documents (DPDs) within the Local Plan.

**1.2.3** The Development Management Plan (DMP) builds on the objectives and principles of the Core Strategy and includes more detailed policies for the management of development. The DMP was adopted in November 2011.

**1.2.4** The Council adopted the Area Action Plan (AAP) for Twickenham centre in 2013, which sets out detailed policies and proposals for Twickenham centre. The NPPF was fully taken into account during the development of the AAP, and due to its relatively recent adoption, the AAP will not be reviewed or amended as part of the Local Plan Review.

**1.2.5** The six west London Boroughs (Brent, Ealing, Harrow, Hounslow, Hillingdon and Richmond upon Thames) and latterly the Old Oak and Park Royal Development Corporation, have jointly prepared the West London Waste Plan (WLWP). It sets out a strategy for the sustainable management of waste and also allocates sites for managing West London's waste over the period up to 2031.

**1.2.6** The saved Unitary Development Plan has been largely replaced by the Local Plan (i.e. the Core Strategy, DMP and WLWP). The only parts of the UDP that remain saved and have not been superseded are the site-specific Proposals.

**1.2.7** The Council commenced work on a Site Allocations Plan in December 2012 with a 'Call for Sites' consultation. Pre-publication consultations were undertaken in 2013 and 2014. The Council has decided not to pursue a separate Site Allocations DPD but rather take forward site-specific allocations alongside the review of the existing policies, and these will be incorporated into this Local Plan. This enables the Council to align the sites available with the needs of the borough as identified through this Local Plan Review.

**1.2.8** The Borough Community Infrastructure Levy (CIL), although not a formal DPD, is of relevance to the Local Plan as it sets out the Council's rates of CIL that apply to certain types of development in the borough.

## 1.3 Preparing the Local Plan

**1.3.1** Between 4 January and 1 February 2016, the Council undertook a consultation on the rationale and scope for the review of the Core Strategy and DMP policies as well as the proposed sites to be allocated for development. This was an additional stage of consultation by the Council (not prescribed by the Town and Country Planning (Local Planning) (England) Regulations 2012) to provide the opportunity for early engagement with interested parties, including Duty to Cooperate bodies.



**1.3.2** As part of the early consultation, the Council prepared an assessment of each existing planning policy of the Core Strategy and DMP against relevant national and regional policies and guidance, as well as local evidence and identified needs. This was used to indicate whether there was a need to review the policy and what that scope of the review might involve.

**1.3.3** The Council received 80 responses to the scoping consultation. All responses have been analysed and considered as part of the preparation of this Pre-Publication version of the Local Plan. A record of all responses submitted including a full analysis of the consultation responses are available on the [Council's website](http://www.richmond.gov.uk/local_plan_review.htm) at: [www.richmond.gov.uk/local\\_plan\\_review.htm](http://www.richmond.gov.uk/local_plan_review.htm).

**1.3.4** Public consultation on this Pre-Publication version is to be carried out from 8 July until 19 August 2016 for a 6-week period in line with Regulation 18 of the Local Planning Regulations.

**1.3.5** The indicative timetable for the Local Plan Review is set out in the table below.

What	When
Consultation on scope of review of policies and draft site allocations – this consultation	4 January - 1 February 2016 (completed)
First consultation on the draft Local Plan ('Pre-publication')	8 July - 19 August 2016 (current stage)
Second consultation on the draft Local Plan ('Publication') that the Council intends to submit to Secretary of State	Late Autumn 2016
Submission of the draft Local Plan to the Secretary of State	Spring/Summer 2017
Independent Examination in Public	Autumn/Winter 2017/18

What	When
Adoption of the Local Plan	Spring 2018

#### 1.4 Consultation on this Plan and associated Documents

**1.4.1** The following documents, which are available on the [Council's website](http://www.richmond.gov.uk/local_plan_review) at [www.richmond.gov.uk/local\\_plan\\_review](http://www.richmond.gov.uk/local_plan_review), are all being consulted on at this stage:

- 1. Pre-Publication Local Plan (this document):** this sets out the draft new planning policies together with the Core Strategy and DMP policies to be superseded. In addition, it sets out why we are reviewing each policy area and what the evidence says. The policies have been grouped into related policy areas such as Local Character and Design, Housing, Transport. The Local Plan Review takes forward the three inter-related themes of the existing Core Strategy of 'Protecting Local Character', 'A Sustainable Future' and 'Meeting People's Needs', which provide the golden thread throughout the draft Local Plan. In addition, this document sets out the site allocations that are considered central to the delivery of the strategic policies and the Spatial Strategy. In some policy areas (such as Parking) work is still being undertaken, and therefore these policy areas will be further refined as part of the Council's Publication version of the Local Plan.
- 2. Sustainability Appraisal of the Pre-Publication Local Plan:** this sets out how the economic, environmental and social effects that may arise from the Local Plan (for both the policies and the site allocations) have been assessed and taken account of.

**1.4.2** The following supporting documents and background papers, which are available on the [Council's website](http://www.richmond.gov.uk/local_plan_review) at [www.richmond.gov.uk/local\\_plan\\_review](http://www.richmond.gov.uk/local_plan_review), are also made available alongside the main consultation documents:

## Pre-Publication Local Plan

- **Equalities Impact Assessment:** this sets out the assessment against nine protected equalities characteristics. The assessment has been undertaken to ensure that any potential equalities consequences of the draft policies and site allocations have been considered and, where possible, eliminated or minimised so that opportunities for promoting equality and diversity are maximised.
- **Health Impact Assessment:** this sets out the findings of the assessment of the health and wellbeing impacts of the draft policies and site allocations.
- **Detailed review of existing policies:** This sets out the detailed analysis and assessment of the existing planning policies against national and regional guidance, local evidence and need, together with the original rationale and scope for the review of the policies. This document was first produced for the public consultation in early 2016 on the scope and rationale for the Local Plan Review. It has been kept up-to-date with regard to the assessment against national and regional guidance as well as local evidence and need to take account of any recent changes to the national planning policies and emerging/published local evidence studies.
- **Updated local evidence,** including the draft Strategic Housing Market Assessment (SHMA), which has been used to inform the policy approaches on Housing and Affordable Housing. Other relevant Local Plan evidence is published on the Council's website at: [www.richmond.gov.uk/local\\_development\\_framework\\_research.htm](http://www.richmond.gov.uk/local_development_framework_research.htm)



# Strategic Context, Vision and Objectives 2

Pre-Publication Local Plan

## 2 Strategic Context, Vision and Objectives

### Pre-Publication Local Plan

## 2 Strategic Context, Vision and Objectives

### 2.1 Strategic Context

#### **The London Borough of Richmond upon Thames Local Plan 2018 - 2033**

**2.1.1** Our Local Plan sets out the strategic planning framework for the borough for the next 15 years. The Local Plan contains the strategic vision and objectives for the borough as well as the policies and site allocations that will guide the future development of the borough.

**2.1.2** The Local Plan takes account of other plans and strategies, and it is the main delivery mechanism for the spatial elements of the borough's Community Plan and the Council's Corporate Plan.

#### **The Community Plan 2016 - 2020**

**2.1.3** The Community Plan sets out The Richmond Partnership's vision for the borough and describes how the Council and its partners will engage and involve the local community.

**2.1.4** The overall vision as set out in the Community Plan is, for a borough where:

- people will lead happy lives and are able to enjoy life, with opportunities to learn, develop and fulfil their potential;
- people can live as independently as possible in the local community and feel empowered to take responsibility for their health and wellbeing, and plan for their future;
- people feel safe, are respected and valued, and able to contribute to their communities and where diversity is celebrated;
- the local character of the environment is protected and new development is high quality and compatible with local character, meets people's needs and provides opportunities for all; and
- our towns and local centres are attractive, viable for businesses and contribute positively to the quality of life for residents and visitors.

**2.1.5** The Community Plan is based around three themes:

1. Involving and engaging local people and businesses
2. Delivering cost effective services to meet local needs
3. Being accountable to local people

**2.1.6** For each theme, the Partnership has identified a set of priorities, which are designed to help to achieve the Partnership's vision for the communities of this borough. Further information can be found on the [Council's website](http://www.richmond.gov.uk/community_plan) at [www.richmond.gov.uk/community\\_plan](http://www.richmond.gov.uk/community_plan)

#### **The Corporate Plan 2016 - 2019**

**2.1.7** The Corporate Plan presents the Council's priorities for residents for the period from 1 April 2016 to March 2019, with an emphasis on the programme activity to be delivered during the next 12 months. It also outlines how the Council will take these forward and defines how it will measure progress.

**2.1.8** The Council's Corporate Plan has three overarching aims:

1. To transform local public services through partnership and collaboration through its community leadership role;
2. To build community capacity to enable residents and communities to take greater control over their lives and to shape and where appropriate deliver local services; and
3. To act primarily as a strategic commissioning body with a reduced role in service delivery.

**2.1.9** The corporate vision is for Richmond upon Thames to be the best borough in London; a borough identified by its green character, historic buildings, high quality appearance, vibrant high streets and outstanding schools and services; one where businesses and the voluntary sector can thrive; where citizens can help change neighbourhoods in which they live; and feel safe being part of one of London's safest boroughs. A borough

where the most vulnerable of our residents are supported and where everyone can live as independently as possible with good health and a sense of wellbeing for the better.

**2.1.10** The Council's priorities are categorised under the themes of 'People', 'Place', 'Resources' and 'How we work', in order to align our business planning processes with our commissioning intentions. Within these themes, the following service priorities have been identified:

1. People
  - Protecting the most vulnerable
  - A healthy borough
  - The best schools in London
2. Place
  - A green borough
  - Supporting local business and arts
  - A safe borough
3. Resources
  - A lower tax borough
  - An accountable and open council
4. How we work
  - Involving our community
  - Community leadership
  - Fairness for all

**2.1.11** Further information can be found on the [Council's website](http://www.richmond.gov.uk/corporate_plan) at [www.richmond.gov.uk/corporate\\_plan](http://www.richmond.gov.uk/corporate_plan)

### Village Planning

**2.1.12** Village Plans have been developed for each of the borough's 14 villages. Each Village Plan describes a vision for the village area and identifies what the Council will do and what people can do to achieve the vision together. They set out the key issues and priorities and provides background information on the village areas.



**2.1.13** Each village is distinctive in terms of the community, facilities and local character. The borough's villages are attractive with many listed buildings and conservation areas. The local character of each is unique, recognisable and important to the community and to the character of the borough as a whole. In response to the Council's 'All in One' survey, which

## 2 Strategic Context, Vision and Objectives

### Pre-Publication Local Plan

showed that residents had a desire to shape planning guidance for their local area, the Council is developing Village Planning Guidance in the form of Supplementary Planning Document (SPDs), with the exception of Ham and Petersham, where the designated Neighbourhood Forum is developing its own Neighbourhood Plan for the area. The SPDs identify the key features and characteristics of the village areas, including the most important aspects and features that contribute to local character and that are valued by local communities. The Village Plan SPDs are the main starting point for design guidance to those seeking to make changes to their properties or who wish to develop in the area. Further information on the Council's Village Planning Process can be found on the [Council's website](http://www.richmond.gov.uk/village_plans) at [www.richmond.gov.uk/village\\_plans](http://www.richmond.gov.uk/village_plans)

**2.1.14** The 2015 Residents' Survey showed that almost all Richmond residents (97%) are satisfied with their local area as a place to live. The natural environment with its high quality parks and open spaces, the location and convenience as well as the quiet and peaceful nature of the borough are the most important attributes for the borough's residents.

**2.1.15** The Council's Uplift programme continues to rejuvenate the Whitton, Hampton North, Barnes, Mortlake, Ham, Fulwell and Hampton Hill areas of the Borough, which local people say are in need of improvement.

### Heathrow

**2.1.16** The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the following documents:

1. Community Plan 2016 - 2020: This recognises that air-craft noise is a very significant issue for many residents, having an impact on quality of life, health and education. Night flights are particularly intrusive. The Council is leading the local resistance to proposals to expand Heathrow airport and would like to see a permanent block on any expansion of the airport. As part of achieving the Community Plan's

key priority "For a greener borough", the Council will oppose any expansion of Heathrow Airport and any changes to the existing arrangements which will have an adverse impact on the borough.

2. Corporate Plan 2016-19: This sets out that the Council will take the lead from the community, who overwhelmingly voted against expansion of Heathrow Airport, and that we will work with other boroughs and influential parties to press the government to reject the 2015 Airport Commission report recommending a third runway at Heathrow.

**2.1.17** The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary. However, in commenting on any planning application in relation to Heathrow Airport, the above statement sets out clearly the Council's position on Heathrow.

## 2.2 Strategic Vision

**2.2.1** The Local Plan has 3 inter-related themes of 'Protecting Local Character', 'A Sustainable Future' and 'Meeting People's Needs'. These three themes provide the golden thread that runs through the Local Plan. They form the basis of the Strategic Vision set out below, which describes what the borough will be like in 2033.

### The Local Plan Strategic Vision

Our vision for the London Borough of Richmond upon Thames over the next 15 years is to build on the success of maintaining and enhancing the borough's villages, its unique character and developing a strong and varied sense of place, in partnership with local communities and other key stakeholders.

### 1. PROTECTING LOCAL CHARACTER

#### Villages and historic environment



The borough's villages and their special and distinctive characters will have been protected, with each being unique, recognisable and important to the community and to the character of the borough as a whole. Villages will continue to maintain and enhance their distinctiveness in terms of the community, facilities and local character. Listed Buildings and Conservation Areas, which contribute so significantly to the character of this borough, will have been protected and enhanced.

### **Residential quality of life**

Richmond borough will be the best place in London to live as a result of the quality of the built environment and the high quality design of new development that respects and enhances its distinctive character. The amenity of residents and local neighbourhoods will have been protected and action taken on environmental issues and pollution. The quiet and peaceful nature of the borough, alongside its breathtakingly beautiful parks and open spaces, will continue to ensure that all Richmond borough residents cherish their local area as a place to live.

### **Natural environment, open spaces and the borough's rivers**

The outstanding natural environment and green infrastructure network, including the borough's parks and open spaces, biodiversity and habitats as well as the unique environment of the borough's rivers and their corridors will have been protected and enhanced where possible. Residents will continue to highly value and cherish the borough's exceptional environmental quality.

## **2. A SUSTAINABLE FUTURE**

### **Sustainable growth and transport**

The borough's main centres will have accommodated the majority of higher density and larger scale developments, thus enabling people to walk to shops and services or use public transport. New

development will be of exceptional design quality and will have respected the borough's environmental capacity and constraints through the optimisation of land. Development opportunities outside of the main centres will have been realised and well integrated within existing communities, the environment and infrastructure. Local communities will enjoy the new village heart in Mortlake and residents will have access to a choice of new and improved homes in Ham Close.

Whilst cars will still be a crucial part of our future, the borough's improved transport network and interchanges will encourage many residents as well as those who work and visit the borough to make journeys using high quality public transport and walking and cycling routes. The built environment, spaces and public realm will be attractive and pleasant, and residents will have increasingly adopted active and healthy lifestyles and enjoy the borough's cycling and walking networks.

### **The borough and its interrelationship with Greater London and the South East**

The borough will continue to relate in a sustainable way to Greater London and the South East in terms of providing homes, jobs, shops and services. Local communities and residents from neighbouring and other London boroughs as well as the wider region will enjoy the borough's exceptional parks, open spaces and recreational and cultural opportunities. The borough's reputation and role in providing the green lung for south west London will be recognised and cherished in Greater London and beyond.

The borough will continue to be an attractive and inviting place, and visitors will come to the borough to enjoy the many tourist attractions, including the unique, historic and cultural assets that are connected by the River Thames.

### **A sustainable and smart borough**

The Council will have played its part in minimising vulnerability of people and property to a changing climate, including mitigating and adapting to the effects of climate change and supporting the move towards zero carbon. The borough will be a place where innovation and Smart City technology is harnessed to enable smart digital and communications infrastructure, enabling businesses to respond to customer demand, and to support the borough on its path to becoming smarter.

### **3. MEETING PEOPLE'S NEEDS**

#### **Facilities to meet needs**

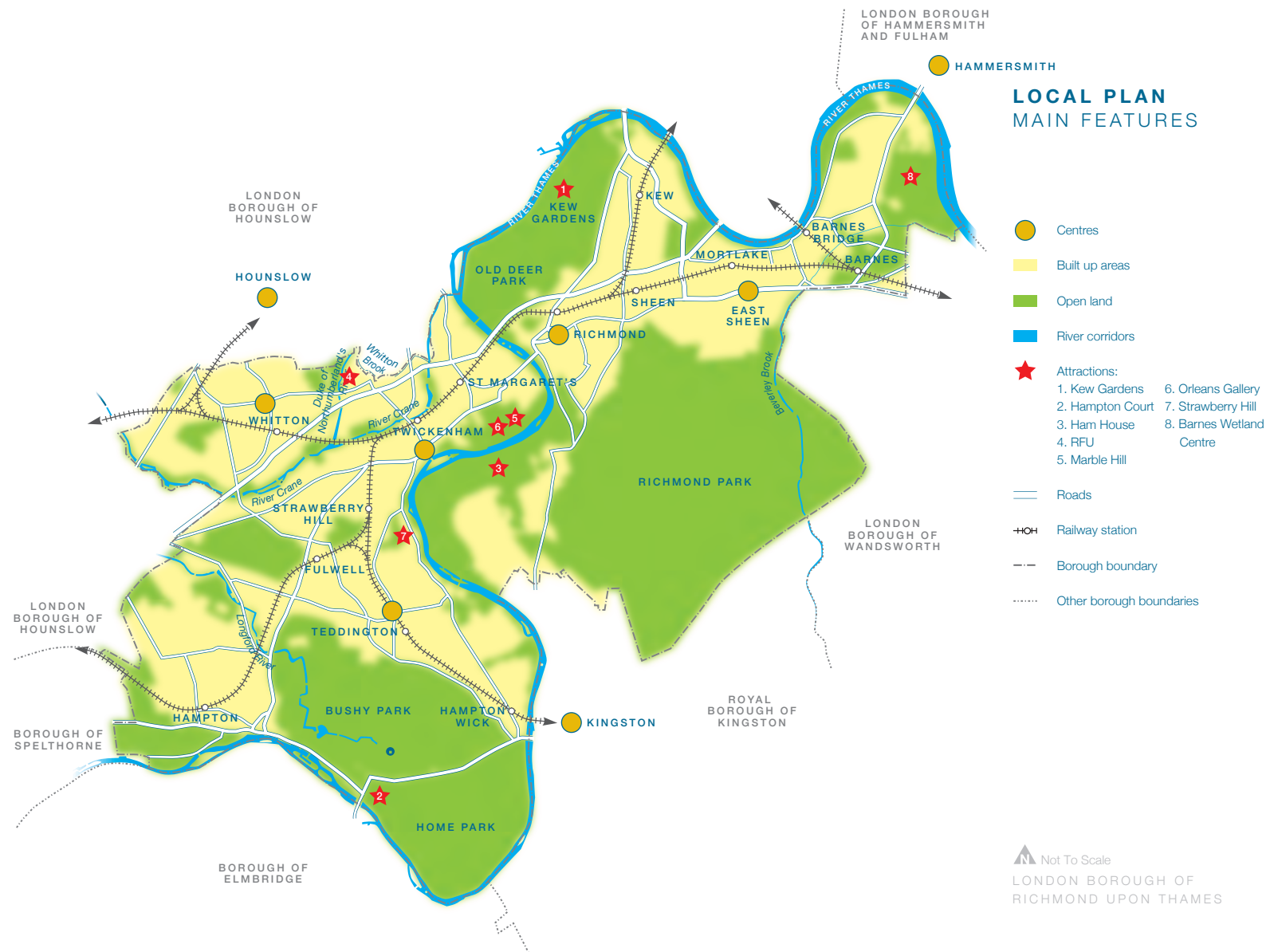
Residents will have a choice of new homes, including affordable homes, as well as the infrastructure required to support their daily needs. They will have access to a range of exceptional educational and training facilities, including a choice of schools and nurseries, community facilities, shops and services as well as employment and recreational activities. Residents will have benefited from local training and employment opportunities, and they will continue to enjoy the strong sense of community and inclusiveness as well as social interaction and cohesion.

#### **The borough's centres**

The borough's centres, including the main centres as well as local and neighbourhood centres and parades, will continue to perform well and flourish. Central Richmond will continue to thrive and a new and improved station will provide a welcoming and pleasant environment for all those that live, work and visit the borough. Twickenham, including the station and surrounding area as well as the riverside, will have been rejuvenated and developed into a flourishing and vibrant business and cultural centre. Whitton, Teddington and East Sheen will have maintained and enhanced their role in providing shops, services and employment opportunities for local communities.

#### **Jobs and the local economy**

The borough's local economy will be successful. Jobs will be readily available and there will be a choice of employment opportunities as the borough's Key Office Areas as well as the industrial land and business parks will have been protected from encroaching residential development. Employment space will have supported new business start-ups and enabled businesses to grow. There will continue to be a high proportion and variety of small local businesses, offering local jobs, and further opportunities for residents to set up their own enterprise.



#### 2.3 Strategic Objectives

**2.3.1** The strategic objectives for the Local Plan outline what will need to be achieved to deliver the Local Plan's strategic vision. The objectives also set out how the key sustainability issues facing the borough, as identified in the Sustainability Appraisal and its Scoping Report, are addressed.

The following objectives set out how the key issues facing the borough, as set out in the Sustainability Appraisal, the Strategic Vision and the Spatial Strategy, will be delivered:

##### **Protecting Local Character**

1. Maintain and enhance the borough's attractive villages, including the unique, distinctive and recognisable local characters of the different village areas and their sub-areas.
2. Protect and, where possible, enhance the environment including historic assets, retain and improve the character and appearance of established residential areas, and ensure new development and public spaces are of high quality design.
3. Protect and improve the borough's parks and open spaces to provide a high quality environment for local communities and provide a balance between areas for quiet enjoyment and wildlife and areas to be used for sports, games and recreation.
4. Protect and enhance the borough's network of green infrastructure that performs a wide range of functions for residents, visitors, biodiversity and the economy.
5. Protect and enhance the borough's biodiversity, including trees and landscape, both within open spaces but also within the built environment and along wildlife corridors.
6. Protect and improve the unique environment of the borough's rivers, especially the River Thames and its tributaries as wildlife corridors, as opportunities for recreation and river transport where possible, increasing access to and alongside the rivers where

appropriate, and gain wider local community benefits when sites are redeveloped.

##### **A Sustainable Future**

1. Minimise and mitigate the effects of climate change by requiring high levels of sustainable design and construction including reductions in carbon dioxide emissions by minimising energy consumption, promoting decentralised energy and the use of renewable energy as well as requiring high standards of water efficiency.
2. Promote and encourage development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property; this includes by risk of flooding, water shortages, subsidence and the effects of overheating.
3. Optimise the use of land and resources by ensuring new development takes place on previously developed land, reusing existing buildings and encouraging remediation and reuse of contaminated land.
4. Reduce or mitigate environmental impacts and pollution levels (such as air, noise, light, odour, fumes water and soil) and encourage improvements in air quality, particularly along major roads and areas that already exceed acceptable air quality standards.
5. Ensure local environmental impacts of development are not detrimental to the health, safety and the amenity of existing and new users or occupiers of a development or the surrounding area.
6. Promote safe and sustainable transport choices, including public transport, cycling and walking, for all people, including those with disabilities.
7. Encourage improvements to public transport, including quality and connectivity of transport interchanges, and support the use of Smart City technology and practices.



8. Promote sustainable waste management through minimising waste and providing sufficient land for the reuse, recycling and treatment of waste, and minimise the amount of waste going to landfill in line with the West London Waste Plan.
9. Support sustainable growth of the visitor economy for the benefit of local communities and promote the borough as an attractive and inviting place to visit and enjoy.
10. Enhance the borough's existing tourist attractions, including the unique, historic and cultural assets that are connected by the River Thames.
11. Create attractive and pleasant environments and spaces that promote active and healthy lifestyles, including recognising their benefits to residents' social life and their economic benefits to the borough's centres.

#### **Meeting People's Needs**

1. Ensure there is adequate provision of facilities for community and social infrastructure that are important for the quality of life of residents and which support the growing population, by protecting existing and, where required, securing new facilities and services that meet people's needs.
2. Ensure there is sufficient provision of facilities and services for education and training for all age groups to help reduce inequalities and support the local economy; this includes school places as well as children's centres and youth provision and promoting local employment opportunities and training programmes.
3. Ensure there is a suitable stock and mix of high quality housing that reflects local needs by providing a choice of housing types and sizes, with higher density development located in more sustainable locations, such as the borough's centres and areas better served by public transport.
4. Pursue all opportunities to maximise affordable housing across the borough through a range of measures, including providing

- more choice in the different types of affordable housing and different levels of affordability.
5. Ensure there continues to be good provision of, and access to, shopping and other local services and facilities that meet the needs of our communities.
6. Reinforce the role of Richmond, Twickenham, Teddington, Whitton and East Sheen centres, which play an important role in the provision of shops, services, employment and housing as well as being a focus for community and cultural life.
7. Ensure that local and neighbourhood centres as well as parades of local importance provide a focus for local communities to meet, shop, work and spend leisure time.
8. Encourage opportunities for leisure, entertainment, sport, cultural activity and the development of community life.
9. Ensure there continues to be a wide variety of employment and training opportunities available to residents and support for businesses.
10. Protect and encourage land for employment use, particularly for affordable small / medium spaces, start-up and incubator units and flexible employment space, in order to support the borough's current and future economic and employment needs.
11. Facilitate inward investment and support businesses, particularly small and medium-sized enterprises and creative industries to grow the employment base of the borough.
12. Encourage the creation of healthy environments and support healthy and active lifestyles, including through measures to reduce health inequalities. This includes ensuring there is an appropriate range of health facilities that meet local needs, and tackling childhood obesity by restricting access to unhealthy foods, particularly fast food takeaways, in proximity to schools.
13. Promote inclusive and sustainable communities, social interaction, cohesive, healthy and dementia-friendly communities, and enable the older population to remain independent and active for longer.

# Spatial Strategy 3

Pre-Publication Local Plan

## 3 Spatial Strategy

### 3.1 Spatial Strategy

#### Introduction

**3.1.1** The Local Plan aims to meet the needs of local communities and businesses through the provision of housing, employment, schools, community services, social infrastructure, leisure and other local services, in a sustainable way.

**3.1.2** National policy and guidance sets out the concept of 'sustainable development', which has three dimensions: economic, social and environmental. The policies in the Local Plan follow the approach of the presumption in favour of sustainable development as set out in national policy. This Plan defines the local dimensions of sustainable development and shows how this presumption in favour is expressed locally; in particular, the Council places strong emphasis on protecting and, where possible, enhancing the special environment, local character and uniqueness of this borough by recognising the environmental constraints and limits that provide the context for growth in the borough and which need to be respected.

**3.1.3** The Spatial Strategy, as set out below, takes forward the existing Spatial Strategy of the Core Strategy. It builds on information from our evidence base, including feedback from public consultations such as through the development of the Village Plans as well as the Sustainability Appraisal, which sets out a detailed and up-to-date analysis of the key sustainability issues, challenges and opportunities for the borough. The Spatial Strategy also sets out how the main elements of the strategic vision and strategic objectives for the borough are to be delivered over the plan period from 2018 to 2033.

#### Spatial Strategy Summary

**3.1.4** The Spatial Strategy reinforces the borough's context as an outer London Borough that is characterised by a high quality natural, built and historic environment with highly valued open landscape, parks, green spaces and opportunities for sport, recreation, culture and tourism. The overarching principles are to protect the unique local character (as set out in the Village Planning Guidance SPDs and in the emerging Ham and Petersham Neighbourhood Plan), maintain and enhance our open spaces as well as our heritage, achieve high levels of sustainability and ensure all communities have access to housing, employment opportunities, services and facilities.

**3.1.5** The unique and locally distinctive historic and cultural environment as well as the protected parks and open spaces limit the opportunities for development and growth within the borough. The borough is constrained by its already developed areas, limited opportunities for redevelopment, large expanses of protected open space and by the River Thames and its floodplain.

**3.1.6** The Spatial Strategy emphasises that local community needs, including delivery of housing and the infrastructure required to support it, are expected to be met without compromising the quality of the natural and built environment. This means in particular that the highly valued network of green infrastructure, including for its contribution to biodiversity objectives, will be protected, and where possible enhanced. The borough's parks and open spaces provide not only recreational opportunities for those that live and work in this borough, but also for local communities and residents in neighbouring and other London boroughs, by providing the green lung for southwest London. Therefore, there is a presumption against the loss of, or building on, greenfield sites in this borough. The Spatial Strategy and the Local Plan policies, taken as a whole, also set out how development and use of land will contribute to the mitigation of, and adaptation to, climate change.

**3.1.7** The Spatial Strategy and supporting evidence demonstrate that the Council can meet its strategic housing target without using greenfield sites. New housing will be provided through redevelopment and maximising

the use of brownfield sites. Affordable housing is a key priority of the Plan and all opportunities to maximise affordable housing through a range of measures will be pursued.

**3.1.8** Higher density and larger development, including commercial schemes, will as far as possible be concentrated in the borough's five main centres (i.e. Richmond, Twickenham, Teddington, Whitton and East Sheen), thus enabling people to walk or cycle to shops and services or use public transport. There will continue to be opportunities for development outside these centres and on key development sites, such as Stag Brewery in Mortlake and Ham Close in Ham - these sites are identified for development in this Plan.

**3.1.9** Whilst there have been significant structural changes to the retail sector in recent years, particularly in the growth in popularity of internet shopping, research into the health of the centres, including vacancy rates, suggests that the borough's main centres continue to perform well. The Council's Retail Study (2014) estimates that an increase in retail floorspace of 21,700sqm gross will be needed by 2024, comprising of about 4,000sqm gross of convenience goods floorspace, 11,500sqm gross of comparison goods floorspace and 6,500sqm gross of Class A3/A4/A5 floorspace. Some of this need could be met by the re-occupation of existing vacant units in some centres. However, it is unlikely that vacant shops can account for more than a quarter of this additional capacity. Site allocations in the Local Plan are sufficient to meet the remainder of the forecast increase in floorspace.

**3.1.10** The Spatial Strategy also reinforces the character of the borough's villages. The local character of each village is unique, recognisable and important to the community and to the aesthetic of the borough as a whole.

#### **Protecting Local Character**

**3.1.11** The borough has an outstanding built, historic and natural environment and a key priority of the Spatial Strategy is that this unique local character continues to be protected and enhanced throughout the borough. The different village areas and their special character within the

borough, including those along the River Thames and its banks, will be maintained and enhanced, and historic views will be protected. In established residential areas the historic character as well as local biodiversity and trees will be maintained.

**3.1.12** The borough is recognised as having exceptional green and open spaces, including Richmond Park, Bushy and Home Parks and the Royal Botanic Gardens Kew. The existing areas of designated open land will continue to be protected for visual amenity, biodiversity, sport and recreation.

**3.1.13** A hierarchy of open spaces of different sizes and functions will be maintained, and improvements sought in areas of deficiency for open space or biodiversity. Many of the borough's parks and open spaces are of regional or metropolitan importance in providing opportunities for recreation, and many have historic significance, biodiversity value or can be regarded as areas of relative tranquillity. The open space network, including the Blue Ribbon network of the River Thames and River Crane corridors as well as other tributaries, and the links in between provide the natural infrastructure that performs a wide range of functions for residents, visitors, biodiversity and the economy. The borough's parks and open spaces provide not only recreational opportunities for those that live and work in this borough, but also for local communities and residents in neighbouring and other London boroughs, thus providing the green lung for south/west London. The Spatial Strategy demonstrates that the Council can meet its borough's housing needs without releasing open land that is protected by designations such as Green Belt or Metropolitan Open Land.

**3.1.14** In order to achieve sustainable growth within the borough, future development is therefore expected to take place on brownfield sites. Improvements, such as enhancing the immediate environment, creating new pedestrian and cycling linkages, especially to and from as well as alongside the rivers, and other environmental enhancement will be sought.

**3.1.15** Sites designated for their biodiversity and nature conservation value, including the connectivity between habitats will be protected and enhanced.



## A Sustainable Future

**3.1.16** As an Outer London borough there has always been considerable in and out commuting for work, education, shopping and leisure activities and this is likely to continue, even if residents are able to carry out most day to day activities locally. In addition, the borough is an attractive and inviting place to visit and enjoy. Sustainable growth of the visitor economy for the benefit of the local area will be supported and the Council will promote and support the enhancement of the borough's existing tourist attractions, including the unique, historic and cultural assets that are connected by the River Thames, such as Royal Botanic Gardens Kew, Ham House and Hampton Court Palace.

**3.1.17** To reduce environmental impacts, including air pollution and congestion, and to maximise opportunities for health and promoting active lifestyles, the Council will continue to work with its partners to improve and promote safe, sustainable and accessible transport choices, including public transport, cycling and walking. Focusing development in the main centres of the borough (i.e. Richmond and Twickenham as well as Teddington, East Sheen and Whitton) will result in sustainability benefits, including a reduction in the need to travel by car and also mitigate the effects of development pressure on the rest of the borough. A main element of the Spatial Strategy is to promote cycling and walking, which contribute significantly towards creating an attractive and pleasant environment, which has been shown to be not only beneficial to an individual's health and social life, but also to bring economic benefits to the borough's centres.

**3.1.18** The Spatial Strategy reinforces the need to improve accessibility, including through the quality and connectivity of transport interchanges, as identified in the London Plan and Outer London Commission. The Council will work with its partners, including the operating companies, and propose improvements to be taken forward through its Local Implementation Plan for Transport.

**3.1.19** To play our role in minimising and mitigating the effects of climate change, the Council will continue to require high levels of sustainable design and construction and remains committed to working towards zero

carbon standards for all new developments. The Spatial Strategy takes forward the Council's commitment to sustainable design and construction. In particular, it seeks to reduce carbon dioxide emissions from development and standards of water efficiency that are higher than set out in national standards. This approach to mitigating the impacts of climate change, including measures to minimise energy use, encouraging decentralised energy as well as renewable energy, is justified as it is based on local evidence and need.

**3.1.20** The Council will promote and encourage development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property. Development will need to be located and designed so it can adapt to and cope with the potential impacts and consequences of climate change such as heat waves. Adapting to the likely effects of climate change also includes ensuring that development is located away from areas considered to be at high risk of flooding, incorporating sustainable drainage wherever possible, ensuring the borough's green infrastructure network is maintained, which also contributes to ensuring that biodiversity can adapt to a changing climate, as well as protecting our water resources and water quality.

**3.1.21** The Spatial Strategy seeks to ensure that local environmental impacts of all development proposals do not lead to detrimental impacts on the health, safety and the amenity of existing and new users or occupiers of development or the surrounding area. Consideration will therefore be given to a range of potential impacts, including, but not limited to, air pollution, noise and vibration, light pollution, odours and fumes and land contamination. In addition, the Strategy seeks to ensure that waste is managed in accordance with the waste hierarchy, which is to reduce, reuse or recycle waste, as close as possible to where it is produced.

## Meeting People's Needs

**3.1.22** The Council places high priority on the provision of community and social infrastructure, which is essential to support the projected population growth of the borough. Such facilities are often at the heart of local communities and they are important for the quality of life of residents.

Community and social infrastructure facilities play an important role in creating more inclusive and sustainable communities and they help to promote social interaction as well as encouraging people to lead more healthy and active lives. Development pressures and high land values in the borough mean there is pressure to redevelop sites. It is therefore vital that existing facilities and services that meet people's needs are protected. Therefore the Council will resist the loss of existing social or community infrastructure.

**3.1.23** There is a continuing need for additional school and nursery places across the borough. The Council's School Place Planning Strategy provides evidence that more school places are required to meet longer-term forecast demand, particularly in the primary phase. The Council will work with partners to encourage the provision of facilities and services for education and training for all age groups to help reduce inequalities and support the local economy. This also includes promoting local employment opportunities and training programmes, particularly where there are opportunities arising from development.

**3.1.24** The Local Plan plays a crucial role in facilitating the creation of healthy environments and the Council promotes and supports healthy and active lifestyles, including measures to reduce health inequalities. The Spatial Strategy seeks to ensure that development results in patterns of land uses and facilities that make the healthy choice the most convenient and attractive option for residents, helping them to lead healthier lives more easily. The Council also supports the creation of environments and a public realm that are inclusive and accessible for the older population, including for those with dementia, and enable the older population to remain independent and active for longer.

**3.1.25** There is an emerging obesity issue in the borough, particularly in children. Access to fast food takeaways detracts from the ability to adopt healthy lifestyles and undermines healthy eating initiatives that may be in place at local schools. Therefore, the Spatial Strategy is to restrict access to unhealthy foods, particularly fast food takeaways, near existing schools, which will assist in tackling childhood obesity.

**3.1.26** Access to local community facilities, services, shops and meeting places such as community centres and local pubs is important in facilitating social interaction and general community wellbeing and happiness. The Local Plan will ensure that there continues to be a good balance of uses in the borough's centres and that there are sufficient opportunities for shopping and other local services that meet the needs of communities. In order to ensure all residents have continued access to local shops and services, the Council will seek to protect such facilities, including not just those within the main centres but also in local and neighbourhood centres and parades of local importance as well as those in more isolated locations, where they are especially important to elderly or less mobile shoppers, those with young children and those without access to cars. There is good coverage across the borough in terms of food shopping provision and therefore the Spatial Strategy continues the existing approach of ensuring there are top-up shopping opportunities within 400 metres of residents' homes.

**3.1.27** The housing target for the borough is set out in the London Plan, with 315 dwellings per annum to be provided for the period of 2015-2025. The Mayor of London will expect the Council to exceed this target. This Spatial Strategy and the policies of the Local Plan identify opportunities for development to come forward by optimising the use of sites, particularly in centres with good public transport accessibility and mixed use redevelopments.

**3.1.28** The Local Plan is informed by an up to date borough-wide Strategic Housing Market Assessment (SHMA), which will be finalised in 2016. This considers and assesses the local housing needs and has informed the housing policies as set out in this Plan. Affordable housing is a priority in the borough and is key to delivering the Spatial Strategy and the relevant strategic objective. Therefore, the Council will pursue all opportunities to maximise affordable housing through a range of measures, including providing more choice in the different types of affordable housing with the aim to provide for different levels of affordability.

**3.1.29** The Council's Monitoring Report on Housing continues to identify a sufficient five year housing land supply in line with the London Plan target. As at 1 April 2015 the housing land supply in the borough potentially provides for 2154 units over the next five years which is 579 units more than the target supply in the London Plan, and another potential 1875 units in years six to ten. The Report also includes a map showing the spatial distribution and expected housing growth, based on the strategic housing land supply. This demonstrates that the Council can continue to meet its strategic housing target without building on or using greenfield sites. New housing will therefore be provided through redevelopment and optimising the use of brownfield sites. Higher density development will be sought in more sustainable locations, such as the borough's centres and areas better served by public transport, subject to compatibility with the surroundings and local context, respecting the quality, local character and amenity of existing neighbourhoods and villages.

**3.1.30** The Local Plan ensures that developments will provide for a choice in housing types and sizes. Generally, the Spatial Strategy is to seek family sized accommodation in the borough, particularly within the residential areas; in the borough's centres, a higher proportion of small units would be appropriate. Opportunities for younger people to get on the housing ladder and downsizing for older people to smaller units were identified in consultations with local communities. Therefore, the Local Plan will ensure that developments provide an appropriate housing mix that reflects local needs and which is appropriate to the location in which the development is proposed.

### **Strengthening local employment and supporting businesses**

**3.1.31** Business and industrial areas are historically dispersed across the borough, and all play an important role in providing business and employment opportunities for the community. The GLA's Employment Projections (2015) estimate that the number of jobs in the borough will be 105,000 by 2031 and 109,000 by 2036. This equates to an increase in 18,000 jobs between 2011 and 2031 and therefore suggests that the borough will experience very strong demand for employment space. The latest employment figures from the Business Register and Employment

Survey show that significant growth has taken place between 2012 and 2014, amounting to an additional 4,500 jobs. Therefore, the Local Plan seeks to protect and maintain this employment base, and enhance it through new provision to accommodate the expected job growth. In addition, due to Government changes to the planning system, including the introduction of Permitted Development Rights from offices to residential, the evidence base confirms that there is a clear need to strengthen the Spatial Strategy and approach to protecting and encouraging land for employment use, particularly for affordable small / medium spaces, start-up units and flexible employment space, in order to support the borough's current and future economic and employment needs.

**3.1.32** As a result of the Permitted Development Rights which allow the change of use of offices to residential, there has been a potential loss of approximately 80,000sqm of office floorspace (an estimated 26% of overall office floorspace in the borough and potential employment space for 6,400 people based on one person per 12sqm). As a consequence, the Council has already introduced two Article 4 Directions to prevent further changes of use from office to residential without the need for planning permission. In addition, this Local Plan introduces a new designation for 'Key Office Areas', in which a more stringent approach to the loss of offices will apply. The Council will encourage new inward investment and the creation of new offices, including refurbishment of older offices and flexible workspaces, particularly in the 'Key Office Areas'. The increase in office floorspace in redevelopment schemes will be particularly supported.

**3.1.33** In relation to the borough's business parks, industrial estates and creative industries, it is acknowledged that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. The London Plan states that a 'restrictive' approach towards the transfer of industrial land to other uses should be adopted in the borough, which means that industrial land should not be released for other uses. Therefore, in order to deliver this key priority and strategic objective, locally important industrial land and business parks, which are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities,

are identified in the Local Plan. Any loss of industrial space within these areas will be strongly resisted. This is to ensure that the borough can continue to provide for local business and employment needs.

#### Spatial Distribution of Development

**3.1.34** Despite the constrained nature of the borough, there is a need to provide more housing, employment, education, retail, leisure and other community and infrastructure services that are needed to support growth within the borough. The traditional village based structure will be maintained and reinforced with a range of housing, local shops and services, employment and recreational activities, at the most local level possible, to reinforce community life, increase accessibility and reduce the need to travel.

**3.1.35** Both Richmond and Twickenham, together with the residential areas surrounding them, are expected to deliver the highest number of housing units, with the broad expected pattern of around 1,000 to 1,050 units in each over the period 2015 to 2025. Across Teddington and the Hamptons and the surrounding residential area the broad expected pattern is around 650-700 units over the period 2015 to 2025, around 400-500 in East Sheen and surrounds, and around 100 in Whitton.

**3.1.36** Richmond and Twickenham centres, with their accessible locations and established range of services, provide the most sustainable options for development in the borough, especially for major commercial developments, including offices and retail. There is some potential for 'tall' buildings and higher densities close to Richmond and Twickenham train stations. Increased densities of housing, including some 'taller' buildings as well as the provision of smaller units, are appropriate in these centres, to an extent that is compatible with the established character as well as environmental and historic constraints.

**3.1.37** **Richmond** main centre is defined as a 'major' centre in the London Plan's network of town centres. The Spatial Strategy is for Richmond to continue to be a thriving major centre with convenience and specialist shops, employment, leisure and tourism, cultural and social

facilities. The Council supports the potential growth of the centre to provide opportunities for leisure and tourism. The expansion of retail provision in the centre, particularly to support its comparison goods shopping and specialist shopping role, is encouraged. Richmond Station provides a major redevelopment opportunity, which could provide substantial interchange improvements as well as a range of appropriate uses, including making a substantial contribution to the identified retail floorspace need (Use Classes A1, A3, A4 and A5) of approximately 10,000sqm in the main centre. New office development is encouraged, and businesses and retailers will be supported, including through the proposed Business Improvement District.

**3.1.38** **Twickenham** is the largest district centre in the borough and has already seen a variety public realm and environmental improvements. Revitalising the centre is a key theme and the main strategy as set out in the adopted Twickenham Area Action Plan (2013), and the benefits from redevelopment opportunities continue to be maximised. The former Post Office Sorting Office, Twickenham Station, Richmond College, Harlequins Rugby Football ground, Twickenham Stadium, the Central Depot and Twickenham Riverside provide excellent opportunities for rejuvenating and contributing to the vitality and viability of Twickenham centre. Twickenham centre is suitable for new major commercial development, which attracts both local people and people who live outside the borough, and the Council supports Twickenham's Business Improvement District. The evidence base suggests an indicative need of 3,200sqm (gross) of retail floorspace by 2024. The projections up to 2024 suggest there is scope for about 700sqm gross of convenience goods floorspace, 1,600sqm gross of comparison goods floorspace (both Use Class A1) and 900sqm gross of Use Class A3/A4/A5 floorspace. A reasonable proportion could be accommodated in vacant premises which along with site allocations included in the Twickenham Area Action Plan will meet the identified need.

**3.1.39** The Strategy for **Teddington, East Sheen and Whitton**, which are defined as district centres in the London Plan, is to maintain and enhance, rather than significantly expand, their role of providing shops, services and employment opportunities for local communities. The Council seeks to maintain and, where appropriate, enhance Teddington's and East



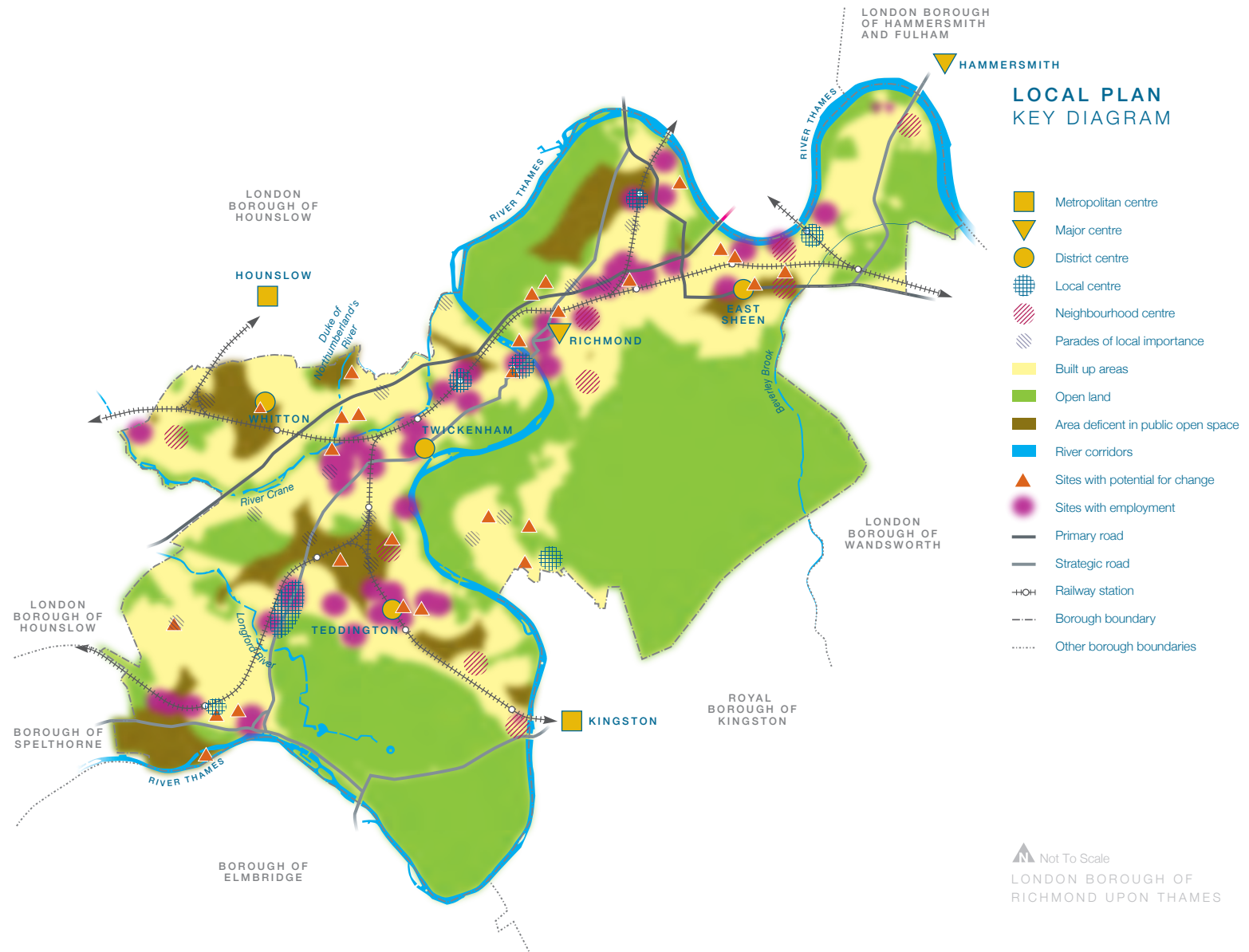
Sheen's role in providing office space for businesses, and new offices are encouraged. Teddington has a well-established restaurant sector and the Council supports establishments that serve the local community. For East Sheen, the Council will seek to create a 'centre' for the village at Milestone Green and improve the convenience of shopping for the community including through a range of uses. Whitton centre plays a particular role for visitors to Twickenham Stadium and the Council seeks to maintain and, where appropriate, improve the range and choice of shopping in the centre, including supporting an improved evening offer. Higher densities could be achieved in Teddington, East Sheen and Whitton centres, but as they are predominately low-rise and characterised by 3-storey buildings, 'taller' buildings would not be appropriate. However, higher residential densities could be achieved without recourse to tall or taller buildings within these centres. The evidence base suggests an indicative need of 2,000sqm in Teddington, 1500sqm in East Sheen and 900sqm in Whitton of retail floorspace (Use Classes A1, A3, A4 and A5) by 2024. (All figures referred to are gross). Whereas East Sheen and Whitton could accommodate some of this in existing vacant units, this is less likely in Teddington. Site allocations are sufficient to meet the remainder of the projection.

**3.1.40** There are also other significant development areas outside of the above five main centres, such as Stag Brewery in Mortlake, Ham Close in Ham, Richmond College in Twickenham and Barnes Hospital in East

Sheen. The evidence base suggests an indicative need of 4,250sqm (gross) of Use Class A3/A4/A5 floorspace by 2024 in total for these smaller centres. This projection takes into account commitments. It is estimated that approximately a third of this projection could be accommodated in vacant premises and along with site allocations, notably the retail allocation at Ryde House, East Twickenham this need can be met.

**3.1.41 Local and neighbourhood centres as well as parades of local importance** provide a focus for local communities and opportunities to meet, shop, work and spend leisure time. The size and function of these centres vary considerably, ranging from larger local centres, such as Barnes and Hampton Hill with a good range of food and comparison shops, independent and specialist shops, community and cultural facilities, through to parades with a small number of shops meeting very local but valued needs.

The successful function of the smaller centres of the borough is of particular importance as the benefits for residents and local communities are significant by providing goods and services that result in a reduced need to travel. The strategy of protecting and reinforcing these smaller centres also supports local businesses and provides local employment opportunities, which in turn benefits the wider community. Local centres in particular can create or foster a sense of community and inclusiveness that adds to the cohesiveness of the surrounding community.



# Local Character and Design 4

Pre-Publication Local Plan

## 4 Local Character and Design

### Pre-Publication Local Plan

## 4 Local Character and Design

### 4.1 Local Character and Design Quality

#### Why we are reviewing this policy area

There is a need to reflect the Council's approach to village planning and the locally specific guidance on design and character as set out in the Village Planning Guidance Supplementary Planning Documents (SPD). We want to strengthen the focus on achieving high quality design, the detailed guidance for which is set out in a variety of SPDs. In addition, we want to align and where possible consolidate design guidance provided in other policies such as relating to housing and transport and bring it into one place. Some updates are also required to reflect recent changes to national planning policy, such as the need to set out a positive strategy for the historic environment as well as reflecting guidance on how the historic environment can make a positive contribution to achieving good design.

#### What the evidence says

The Council has developed a range of SPDs, including Village Planning Guidance for some areas of the borough, Design Quality, House Extensions and External Alterations, Small and Medium Housing Sites, Front Gardens and Shop Fronts. These focus on maintaining and enhancing the quality of the local built environment and provide the necessary detail to assess context, local character and design quality. In particular, the Council's Village Planning Guidance SPDs identify the key features and characteristics of the borough's village areas that contribute to local character and that are valued by local communities. The SPDs are the main starting point for design guidance for those seeking to make changes to their properties or to develop new properties in the area.

Village Planning Guidance SPDs have already been adopted for the areas of Kew, Whitton and Heathfield, Mortlake, Barnes, East Sheen, St Margarets, Richmond and East Twickenham. Early engagement and the development of the Village Planning Guidance SPDs for Hampton, Hampton Hill, Teddington and Hampton Wick are underway. There is a rolling programme to develop SPDs for the remaining village areas and it is anticipated that there will be complete coverage of the borough by end of 2017 (with the exception of the Ham and Petersham Neighbourhood Forum area).

Whilst it is not proposed to develop a borough-wide characterisation study, we will consider producing an overarching paper that addresses how the borough's Village Planning Guidance SPDs provide borough-wide coverage and evidence on the individual characters of the area; it could also address any strategic character and heritage issues.

The Council's Uplift programme continues to rejuvenate the Whitton, Hampton North, Barnes, Mortlake, Ham, Fulwell and Hampton Hill areas of the Borough, which local people say are in need of improvement.

#### Existing Policy CP7 - Maintaining and Improving the Local Environment

Existing buildings and areas in the Borough of recognised high quality and historic interest will be protected from inappropriate development and enhanced sensitively, and opportunities will be taken to improve areas of poorer environmental quality, including within the areas of relative disadvantage of Castlenau, Ham, Hampton Nurserylands, Heathfield and Mortlake.

All new development should recognise distinctive local character and contribute to creating places of a high architectural and urban design quality that are well used and valued. Proposals will have to illustrate that they:

- (i) are based on an analysis and understanding of the Borough's development patterns, features and views, public transport accessibility and maintaining appropriate levels of amenity;
- (ii) connect positively with their surroundings to create safe and inclusive places through the use of good design principles including layout, form, scale, materials, natural surveillance and orientation, and sustainable construction.

#### **Existing Policy DM DC 1 - Design Quality**

New development must be of a high architectural and urban design quality based on sustainable design principles. Development must be inclusive, respect local character including the nature of a particular road, and connect with, and contribute positively, to its surroundings based on a thorough understanding of the site and its context.

In assessing the design quality of a proposal the Council will have regard to the following:

- compatibility with local character including relationship to existing townscape and frontages, scale, height, massing, proportions and form
- sustainable development and adaptability, subject to aesthetic considerations
- layout and access
- space between buildings and relationship to the public realm
- detailing and materials

#### **Existing Policy DM DC 2 - Layout and Design of Mixed Use Schemes**

Within appropriate areas, mixed use schemes will be permitted if they:

1. Include a suitable and compatible mix of uses
2. Add to the vitality and convenience of the area
3. Take account of any potential adverse impacts of the juxtaposition of uses through the layout, design and operation of the area
4. Make the best use of land by sharing facilities and areas such as for parking, servicing, entrance-ways and amenity space where appropriate

#### **Existing Policy DM DC 7 - Shop fronts and shop signs**

The Council will resist the removal of shop fronts of architectural or historic interest.

The Council will expect proposals for new shop fronts or alterations to existing shop fronts to demonstrate a high quality of design, which complements the original design, proportions, materials and detailing of the shop front, surrounding streetscene and the building of which it forms part.

Blinds, canopies or shutters where acceptable in principle must be appropriate to the character of the shop-front and its setting; external security grilles will not normally be permitted; in sensitive areas, rigid and gloss finish blinds will generally be unacceptable;



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Signage and illumination to shop fronts must demonstrate a high quality of design, which complements the character and materials of the shop front and surrounding streetscene, and does not compromise public safety. Large illuminated fascias will not normally be permitted, even if these are in the "house style" of a particular store.

New shop fronts must be designed to allow equal access for all users, and can incorporate flood protection measures where appropriate. Proposals should take account of the Councils SPD on Shop fronts and Shop Signs.

The Council will welcome proposals from groups of shops to add character to the street scene by the use of harmonious high quality design, colours and materials for their shop fronts.

#### **Existing Policy DM DC 8 - Advertisements and Hoardings**

The Council will exercise strict control over the design and siting of advertisement hoardings and other advertisements to ensure that the character of individual buildings and streets is not demonstrably harmed, having regard to the interests of amenity and public safety, including for disabled people, and highway safety.

Powers will be used to remove any advertisement or hoarding erected without permission and where appropriate and practical, to challenge existing hoardings and advertisements that cause substantial injury to visual amenity and public safety, including for disabled people.

### **New Policy LP 1**

#### **Local Character and Design Quality**

A. The Council will require all development to be of high architectural and urban design quality. The high quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.

To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:

1. compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;
2. sustainable design and construction, including adaptability, subject to aesthetic considerations;
3. layout, siting and access, including making best use of land;
4. space between buildings, relationship of heights to widths and relationship to the public realm and natural features;
5. inclusive design, connectivity (as such gated developments will not be permitted), natural surveillance and orientation; and
6. suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site.

All proposals, including extensions, alterations and shop fronts, will be assessed against the advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design.

**Shop fronts**

B. The Council will resist the removal of shopfronts of architectural or historic interest. Shop fronts, including signage and illumination, should complement the proportions, character, materials and detailing, surrounding streetscene and the building of which it forms part. Blinds, canopies or shutters, where acceptable in principle, must be appropriate to the character of the shopfront and its context within which it is located. External security grilles and large illuminated fascias will only be allowed in exceptional circumstances. In sensitive areas, rigid and gloss finish blinds will generally be unacceptable.

**Advertisements and hoardings**

C. The Council will exercise strict control over the design and siting of advertisements and hoardings to ensure the character of individual buildings and streets are not materially harmed, having regard to the interests of amenity and public safety (including highway safety).

**Village Planning Guidance**

**4.1.1** The London Borough of Richmond upon Thames has been divided into a series of smaller village areas. Each village is distinctive in terms of the community, facilities and local character, which together make up the unique and distinctive character of the borough. The villages are attractive with many listed buildings, conservation areas, and the local character of each village is unique, recognisable and important to the community and to the aesthetic of the borough as a whole.

**4.1.2** Village Planning Guidance SPDs have been or are being developed for the village areas (with the exception of Ham and Petersham, where the designated Neighbourhood Forum is developing its own Neighbourhood Plan for the area). The SPDs identify the key features and characteristics of the village areas that are valued by local communities. The Village Planning Guidance SPDs are the main starting point for design guidance to those seeking to make changes to their properties or to develop new

properties in the area. The Council has also developed a range of other SPDs, including on Design Quality, House Extensions and External Alterations, Small and Medium Housing Sites, Front Gardens and Shopfronts. These focus on protecting and improving the quality of the local built environment and provide the necessary detail to assess context, local character and design quality.

**Design quality and character**

**4.1.3** This policy requires developers and applicants to take a sensitive approach to the architectural design of new buildings, extensions and modifications to existing buildings, as well as landscape proposals. The Council does not wish to encourage a particular architectural style or approach but expects each scheme to be to a high quality, with very high quality expected within Conservation Areas. Schemes should be based on a sound understanding of the site and its context, following the locally specific guidance set out in the Village Planning Guidance SPDs.

**4.1.4** Given the built up nature of the borough it is anticipated that most new buildings will be as a result of redevelopment where compatibility with the existing urban fabric is a key consideration. The purpose is to maintain, reinforce and where possible enhance the local character and features that give the area its distinctive and clear identity. New development should respect existing street and development patterns.

**Materials**

**4.1.5** The Council will expect the use of high quality materials and planting which reflect the local character and distinctiveness of an area in all schemes.

**Relationship to other buildings and public realm**

**4.1.6** The harmony of space between buildings should be respected and development be in harmony with surrounding buildings. Elements such as windows, roofs, shopfronts and doors should relate to one another in such a way as to maintain or complement the proportions of the

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surroundings, particularly as expressed in the relationship between solids and voids. Landscape design (including hard and soft landscaping) and the intended use of any open spaces must form an integral part of any proposals. Particular attention needs to be given to the interface between the public and private space and how an area will connect or relate to the wider open space network.

**4.1.7** Modern shop and office layouts should be integrated with the proportions of surrounding development in order to reduce any potential visual impact. Development should be in scale with the adjoining buildings and in proportion with the average street width as defined by building frontages which reflect the urban grain, as required. Where uniform building heights are part of the character of a street it will not normally be appropriate to permit abrupt variations to the general roof line or eaves line, while in other areas irregular building heights may be appropriate.

#### **Access and layout**

**4.1.8** New development, including new routes and access arrangements, should be appropriately integrated with the existing area, street frontage and existing local routes. The applicant will have to demonstrate how new development relates to the existing public transport, pedestrian and cycle networks and how it fosters social inclusion.

**4.1.9** Gated developments, which prevent permeability of sites, will be resisted and pedestrian and cycle links through new development must be publicly accessible at all times.

#### **Co-location and compatibility**

**4.1.10** Proposals should demonstrate that the proposed uses and activities are suitable and compatible with each other and surrounding land uses. The Council will give consideration to the mix of uses proposed and how they will support and connect with the local area through the layout, design and management of the site. Suitable uses will depend on the location and could include a combination of residential, retail, office,

leisure and entertainment uses. It is not always necessary to include residential within a mixed scheme, and in some circumstances the inclusion of residential might impact on the operation of other uses.

**4.1.11** Proposals should maximise the opportunities the site holds to generate a design, which will minimise its environmental impact and take account of micro-climates. Well informed design decisions at an early stage, such as the orientation of a building, can reduce energy consumption through responding positively to climatic conditions.

#### **Shopfronts and shop signs**

**4.1.12** Shopfronts of architectural or historic interest make an important contribution to the character and appearance of the borough. Therefore, the Council will resist the removal of shopfronts of architectural or historic interest. The design of new, and alterations to existing, shop fronts is important both to the appearance of the individual property and to the character and appearance of its local area. Any proposal will therefore be assessed against relevant SPDs, including Village Planning Guidance as well as the Shopfronts SPD.

**4.1.13** Poorly sited or badly designed shop signs, including projecting signs, and illumination can have a detrimental effect on the amenity (including character and appearance) of an area; on the living conditions of residents; and may raise issues of public safety. Security shutters can impact on the visual appearance of an area and can create a hostile environment. The Council will welcome proposals from groups of shops to add character to the street scene by the use of harmonious high quality design, colours and materials for their shopfronts.

#### **Advertisements and hoardings**

**4.1.14** Advertising can enhance the appearance and vitality of a street. However, it can also cause considerable damage to visual amenity by cluttering the built environment and detracting from the quality of the area. Advertisements (defined under the Town and Country Planning Control of Advertisements Regulations) include not only hoardings, but also devices

such as blinds and canopies with lettering, flags with logos and balloons. In considering proposals for an advertising hoarding or other advertisement, including blinds and canopies where relevant, or in deciding whether to take action to remove an existing advertisement, the Council will have regard to the following criteria:

1. hoardings should be of good design and in scale with their surroundings and be of a temporary nature only;
2. any advertisement display must not have an adverse effect upon road traffic conditions and public safety;
3. advertising displays will not be permitted where they would have an adverse effect upon:
  - a Conservation Area;
  - Listed Buildings or Buildings of Townscape Merit;
  - views from or within open spaces or along the Thames riverside and its tributaries;
  - predominantly residential areas;
4. high level, brightly illuminated, or flashing advertisements will not normally be permitted, especially where they might disturb residents.

**4.1.15** As a general rule, advertisement displays will be restricted to shopping, commercial, industrial or transport locations, where they comply with the above criteria and do not cause excessive visual clutter. It must be borne in mind that the Council's level of control is limited and that a number of advertisements do not require formal consent.

**4.1.16** The Council will use its powers to remove any harmful advertisement or hoarding erected without consent and where appropriate and practical, to challenge existing hoardings and advertisements that cause demonstrable harm to amenity and public safety.

## 4.2 Building Heights

### Why we are reviewing this policy area

This policy is in need of updating to clearly set out the definitions for “tall” and “taller” buildings. Reviewing this policy also provides the opportunity to define ‘appropriate’, ‘sensitive’ and ‘inappropriate’ locations for tall buildings in this borough as required by the London Plan. It is also proposed to provide guidance on how to assess potential schemes for tall or taller buildings where there are already existing tall or taller building outside the areas that are identified as ‘appropriate’.

### What the evidence says

The borough's character is predominantly low rise and even in the centre of Richmond and Twickenham taller buildings are of modest height compared to many areas in Central London and other parts of Outer London.

The Council's evidence base is set out in the borough-wide Sustainable Urban Development Study, which is available on the [Council's website](http://www.richmond.gov.uk/borough-wide_sustainable_urban_development_study.htm) at [www.richmond.gov.uk/borough-wide\\_sustainable\\_urban\\_development\\_study.htm](http://www.richmond.gov.uk/borough-wide_sustainable_urban_development_study.htm). The study demonstrates that the borough has many areas (particularly outside of the 5 main centres) that are sensitive to denser developments and taller buildings. The study identifies:

- 'taller' as being significantly taller than the neighbouring buildings, but less than 18 metres in height (below six storeys);
- a 'tall' building as a building of 18 metres in height or higher;

- The centres of Richmond and Twickenham as areas where 'taller' buildings may be appropriate; the potential for 'tall' buildings is generally clustered close to the train stations;
- Whitton, East Sheen and Teddington town as potential for 'taller' buildings; however, Whitton High Street is defined by predominately 3-storey terrace buildings and as such 'taller' buildings are unlikely to be appropriate. The majority of East Sheen centre is defined by predominately 3 storey terrace buildings, and in these areas 'taller buildings' would not be appropriate. Teddington centre is generally low-rise (i.e. 3-storeys) and the High Street is within a designated Conservation Area; there would only be very limited opportunities for 'taller buildings' in the locations where there are currently existing 'tall'/'taller' buildings.
- Mortlake, St Margarets, Strawberry Hill, Hampton Hill, Hampton Wick, Barnes as areas where taller buildings will generally be inappropriate; and
- Hampton, Heathfield, Ham, Petersham, and Kew as areas where 'taller buildings' will be inappropriate.

#### Existing Policy DM DC 3 - Taller Buildings

Taller Buildings will be inappropriate in all areas of the borough except the identified areas within Twickenham and Richmond (Maps 2 and 3). Proposals for taller buildings within these areas will need to:

- be well designed and to make a positive contribution towards the skyline and the surrounding area;
- respect, preserve and enhance the borough's heritage assets, their significance and wider historic environment including The Royal Botanic Gardens Kew World Heritage Site, Listed Buildings, Registered Parks and Gardens, Conservation Areas, Buildings of Townscape Merit, their settings and views of local and strategic importance, including the view from Richmond Hill

- respect the local context and character and to be designed in a way that relates to the scale, height, mass, urban pattern and grain, materials, streetscape, open spaces and built form of an area, and the wider townscape, riverscape and landscape, including the impact on parking
- respect the amenity and privacy of nearby residential areas, including microclimate and overshadowing
- demonstrate a high level commitment to sustainable design and construction
- include a mix of uses, including functions that are accessible to the public, particularly at ground floor level (such as restaurants), in order to ensure successful integration into the surrounding area;
- include safe, attractive, comfortable and accessible amenity/open spaces designed to support social interaction and engender a sense of place.
- buildings will require a full design justification based on a thorough townscape appraisal and historic area assessment, and will be evaluated using the criteria for evaluation identified in CABE/ English Heritage Guidance 2007 and local guidance.

Twickenham (Supplementary Policy Document published with detailed design guidance):

- On the station – buildings up to 4/5 storeys at the highest point and should step down to 2/3 storeys towards Cole Park Road;
- On the Sorting Office – buildings up to 4/5 storeys at the highest point and should step down towards the west end of the site to 3 storeys and 2/3 storeys towards Heatham House, whose setting should be conserved and enhanced;
- On Station Yard buildings should not exceed 3/4 storeys to prevent adverse impacts on the residential context;
- On garages in Mary's Terrace buildings should not exceed 2.5 storeys with development on the front of the site in line with existing houses in Mary's Terrace



**Richmond Station**

- New buildings up to 6 storeys in height on strictly limited parts of the site, stepping down towards surrounding buildings

Any buildings or features taller than the above will only be acceptable subject to a full design justification based on a comprehensive townscape appraisal and there being significant local community support for the public benefits of the overall scheme.

**New Policy LP 2****Building Heights**

The Council will require new buildings to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights, by the following means:

1. require buildings to make a positive contribution towards the local character, townscape and skyline, reflecting the prevailing building heights within the vicinity;
2. preserve and enhance the borough's heritage assets, their significance and their setting;
3. respect the local context, and where possible enhance the character of an area, through appropriate:
  - a. scale
  - b. height
  - c. mass
  - d. urban pattern
  - e. development grain
  - f. materials
  - g. streetscape

- h. Roofscape and
- i. wider townscape and landscape;

4. take account of climatic effects, including overshadowing, diversion of wind speeds at ground level, heat island and glare;
5. refrain from using height to express and create local landmarks;
6. resist buildings that are taller than the surrounding townscape other than in exceptional circumstances, such as where the development is of such high architectural design quality and standards, delivers public realm benefits and as such has a wholly positive impact on the character and quality of the area; and
7. require full planning applications for any building that exceeds the prevailing building height within the wider context and setting.

**4.2.1** The borough is characterised primarily by low to medium-rise residential development patterns, which has produced very attractive townscapes, which are central to the borough's distinctive character.

**4.2.2** The borough-wide Sustainable Urban Development Study demonstrates that higher density development would only be appropriate in the main centres. The conclusions of the study are:

- The potential for 'tall' buildings is generally clustered close to Richmond and Twickenham train stations.
- The centres of Richmond and Twickenham are areas where 'taller' buildings may be appropriate.
- Higher densities could potentially be achieved in Whitton, East Sheen and Teddington centres. However, Whitton High Street is defined by predominately 3-storey terrace buildings and as such 'taller' buildings are unlikely to be appropriate. The majority of East Sheen centre is defined by predominately 3-storey terrace buildings, and in these areas 'taller buildings' would not be appropriate. Teddington centre is generally low-rise (i.e. 3-storeys) and the High Street is within a designated Conservation Area; therefore, opportunities for 'taller

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buildings' would be very limited and only considered in locations where there are currently existing 'tall'/'taller' buildings.

- There are only very few sites outside of the above centres with existing 'tall' or 'taller' buildings, including Richmond College, Teddington Studios and Mortlake Brewery. Within these specific and exceptional sites, 'taller' or 'tall' buildings may be appropriate, subject to the criteria set out in this policy.
- Elsewhere in the borough it is considered that 'taller' or 'tall' buildings are likely to be inappropriate and out of character with its historic context and local distinctiveness.

**4.2.3** 'Taller' buildings are defined as those being significantly taller than the neighbouring buildings, but less than 18 metres in height (below six storeys); a 'tall' building is defined as a building of 18 metres in height or higher

**4.2.4** There is an expectation that higher residential densities will be delivered without recourse to tall buildings. Where new larger developments are proposed some variation in roofscape and height can provide visual interest to the streetscape and avoid overbearing and bulky building forms. Therefore, in some cases, differentiation in roof forms and roof lines within parameters based on the prevailing building height, in order to break up large blocks and reflect the predominantly domestic scale of the borough, may be acceptable.

**4.2.5** Tall or taller buildings can have a greater impact on their environment than other building types, posing problems of overshadowing, overlooking, creation of harmful micro-climates, worsening air quality and harmful effects on residents and amenity spaces. The siting and massing of new buildings will be controlled to avoid harmful intrusions into the skyline and on significant local views. In particular buildings that are higher and bulkier than their surroundings can have a visual impact over a wide area, altering the historic skyline and the character and appearance of Conservation Areas as well as open spaces. They can also dominate, obscure or detract from the setting of Listed Buildings and Buildings of Townscape Merit.

**4.2.6** Any buildings or features taller or bulkier than the surrounding townscape will only be acceptable where a full design justification based on a comprehensive townscape appraisal and visual assessments (including computer visualisations and photo montages) has demonstrated that no material harm is caused to interests of acknowledged importance. Any proposal for a tall or taller building should make a positive contribution to the existing townscape, character and local distinctiveness of the area. In addition, proposals for tall or taller buildings should be designed to positively contribute to streetscape such as by creating high quality public spaces that deliver wider public realm benefits or incorporating uses that enable local communities and the public to access the ground level of buildings. Design considerations include matters relating to height, scale, massing, alignment, silhouette, crown, style, facing materials and use.

**4.2.7** The excessive height of a development can have an intrusive effect on its immediate environment as well as over the whole area from which the building is visible. Where tall / bulky buildings have been erected and which have spoiled the historic skyline as well as the established character of areas, they will be considered as a poor precedent for future development. Therefore, existing tall or taller buildings should not be used as a precedent for allowing further, or replacement, tall or taller buildings where the existing ones are harmful to the townscape or amenity.

**4.2.8** The Advice Note on Tall Buildings produced by Historic England should be followed. Appropriate building heights should be determined by an analysis and understanding of the local character of a street/area as set out in Village Planning Guidance SPDs. Policies, including those relating to local character, design quality, views and vistas, design and construction, amenity and living conditions, should also influence the proposed height of any new development.

**4.2.9** Applications for tall or taller buildings will be required to express the height of buildings in storeys and metres in order for a robust assessment of their effects to be carried out. Any building services and telecommunications equipment on the roof of the building will need to be taken account of in the overall height of the building and will therefore have to be carefully incorporated into the design.

### 4.3 Designated Heritage Assets

#### Why we are reviewing this policy area

Whilst the policies relating to designated heritage assets, such as Conservation Areas and Listed Buildings, are generally in accordance with national policy, there is a need to update the policies to that national guidance on designated heritage assets.

There is also the opportunity to consolidate and streamline policies relating to designated heritage assets (i.e. Conservation Areas, Listed Buildings, Registered Parks and Gardens and Scheduled Monuments) as the same principles and tests apply when assessing harm or substantial harm to such assets.

#### What the evidence says

The borough's exceptional historic environment needs to be sustained and, where possible, enhanced. New development in particular should conserve and, where appropriate, make a positive contribution to the character, appearance and distinctiveness of Conservation Areas, Listed Buildings, Scheduled Monuments and Historic Parks and Gardens and their setting.

The Council has developed a variety of Conservation Area Statements and studies, as well as Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPD) relating to Conservation Areas and Listed Buildings. These provide detailed and locally specific guidance on the implementation of heritage policies.

The review and consolidation of the policies provides the opportunity to ensure that the protection of a designated heritage asset is consistent with its significance and that the assessment of harm and

substantial harm relates to its significance. It is also important to ensure that a deteriorated state of an asset as a result of deliberate neglect or damage is not taken into account when making decisions.

The Council's positive strategy for the historic environment, as required by national guidance, is made up of the following (this list is not exhaustive):

- the Local Plan policies relating to heritage assets;
- Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPDs) on heritage assets, including on locally listed buildings, and Village Planning Guidance;
- maintaining and, if required reviewing, Conservation Area boundaries as well as Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans;
- ensuring Listed Buildings (including locally listed buildings) are maintained and contribute to the character of the place;
- Article 4 Directions;
- Site briefs / Masterplans for sensitive sites.

#### Existing Policy DM HD 1 - Conservation Areas - designation, protection and enhancement

The Council will continue to protect areas of special significance by designating Conservation Areas and extensions to existing Conservation Areas using the criteria as set out in PPS 5 and as advised by English Heritage.

The Council will prepare a Conservation Area Appraisal and Management Plan for each Conservation area, these will be used as a basis when determining proposals within or where it would affect the setting of, Conservation Areas together with other policy guidance.

Buildings or parts of buildings, street furniture, trees and other features which make a positive contribution to the character, appearance or significance of the area should be retained. New development (or redevelopment) or other proposals should conserve and enhance the character and appearance of the area.

#### **Existing Policy DM HD 2 - Conservation of Listed Buildings and Scheduled Ancient Monuments**

The Council will require the preservation of Listed Buildings of special architectural or historic interest and Ancient Monuments and seek to ensure that they are kept in a good state of repair by the following means:

1. consent would only be granted for the demolition of Grade II Listed Buildings in exceptional circumstances and for Grade II\* and Grade I Listed Buildings in wholly exceptional circumstances following a thorough assessment of their significance;
2. retention of the original use for which the listed building was built is preferred. Other uses will only be considered where the change of use can be justified, and where it can be proven that the original use cannot be sustained;
3. alterations and extensions including partial demolitions should be based on an accurate understanding of the significance of the asset including the structure, and respect the architectural character, historic fabric and detailing of the original building. With alterations, the Council will normally insist on the retention of the original structure, features, material and plan form or features that contribute to the significance of the asset. With repairs, the Council will expect retention and repair, rather than replacement of the structure, features, and materials of the building which contribute to its architectural and historic interest; and will require the use of appropriate traditional materials and techniques;

4. using its legal powers to take steps to secure the repair of Listed Buildings, where appropriate;
5. protecting the setting of Ancient Monuments and Listed Buildings where proposals could have an impact;
6. taking a practical approach towards the alteration of Listed Buildings to comply with the Disability Discrimination Act 2005 and subsequent amendments, provided that the building's special interest is not harmed, using English Heritage advice as a basis.

#### **Existing Policy DM OS 1 - Historic Parks, Gardens and Landscapes**

Parks and gardens as well as landscapes of special historic interest included in the Register compiled by English Heritage and other historic parks, gardens and landscapes referred to in para 4.1.11 below, will be protected and enhanced. Proposals which have an adverse effect on the settings, views, and vistas to and from historic parks and gardens, will not be permitted.

#### **New Policy LP 3**

##### **Designated Heritage Assets**

A. The Council will require development to conserve and protect and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. The special architectural, historic interest, the setting and heritage significance of the borough's designated heritage assets, including Conservation Areas, Listed Buildings, Scheduled Monuments as well as the Historic Parks, Gardens and Landscapes, will be conserved and protected by the following means:

1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset.
2. Resist the demolition in whole, or in part, of Listed Buildings. Consent for demolition of Grade II Listed Buildings will only be granted in exceptional circumstances and for Grade II\* and Grade I Listed Buildings in wholly exceptional circumstances following a thorough assessment of their significance.
3. Resist the change of use of Listed Buildings where this would materially harm its character and distinctiveness, particularly where the current use contributes to the character of the surrounding area and to its sense of place.
4. Require the retention and preservation of the original structure, layout, architectural features, materials as well as later features of interest, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset.
5. Demolitions (in whole or in part), alterations, extensions and any other modifications should be based on an accurate understanding of the significance of the heritage asset.
6. Encourage the reinstatement of internal and external features of special architectural or historic significance, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development.
7. Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists.

B. Resist substantial demolition in Conservation Areas unless it can be demonstrated that:

1. in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;

2. in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or
3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.

C. Where there is evidence of intentional damage or deliberate neglect to a designated heritage asset, its current condition will not be taken into account in the decision-making process.

D. Full planning applications are required in Conservation Areas. The Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans, will be used as a basis for assessing development proposals within, or where it would affect the setting of, Conservation Areas, together with other policy guidance, such as Village Planning Guidance SPDs.

**4.3.1** The borough is characterised by primarily low to medium-rise residential patterns, which has produced very attractive townscapes and is central to the borough's distinctive character.

**4.3.2** The borough's exceptional historic environment is central to its character. Many parts of the borough are covered by Conservation Areas, including the majority of Richmond and Twickenham centres. As at 2016, the borough has 72 designated Conservation Areas and each area is accompanied by a Conservation Area Statement, which explains why and when it was designated, including a short history and a map showing the boundary. The borough's Conservation Area Statements and any other studies or appraisals, including the Village Planning Guidance SPDs, include details of many of the most impressive and important buildings as well as audits of assets within the public realm, which are of heritage or aesthetic value.



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**4.3.3** The borough has approximately 1,115 Listed Buildings, including some war memorials, the four Scheduled Ancient Monuments as well as 14 Historic Park and Gardens that are on the Historic England Register of Historic Parks and Gardens, all of which make a significant contribution to the special character of the borough. The borough is also home to the Royal Botanic Gardens Kew World Heritage Site, for which there is a separate policy in this Plan.

**4.3.4** New developments of an exceptional design, which respond to their local and historic context, can make a very positive contribution to the historic environment. It is important to retain not only the character, distinctiveness and setting of designated heritage assets within a Conservation Area, but also the interrelationship between buildings, how they relate to surrounding spaces and areas as well as whole or partial street views, including into and out of a designated area, park, garden or landscape.

**4.3.5** Applications for development that affects designated heritage assets or their setting must:

- Describe the significance of any heritage assets affected, including any contribution made by their setting; the extent of the setting will be proportionate to the significance of the asset. Appropriate expertise should be used to assess the significance of a heritage asset and its setting.
- Demonstrate how the development protects, and where possible enhances, the setting, including views, gaps and vistas and any other features, as identified in the relevant Conservation Area Statement/Study, or in relation to a Listed Building, Scheduled Ancient Monument or Historic Park or Garden.
- Set out how particular attention has been paid to scale, proportions, height, massing, historic building lines, the pattern of historic development, use, design, detailing and materials.
- Conserve and retain original or historic garden or landscape features as well as architectural features such as windows, doors, chimney stacks, walls and gates.

- Describe how the proposal retains the integrity and significance of the building as a whole, the location and hierarchy of rooms, historic floor levels, the structure of the building including foundations, fabric as well as features such as original staircases, original roof structures and other features identified as being of significance.
- Demonstrate that the proposal is of exceptional design that integrates with and makes a positive contribution to the historic environment; and
- Take opportunities to reinstate missing features which are considered important to, or to remove additions or modifications that harm, the significance of the asset.

**4.3.6** Full planning applications are required in all Conservation Areas because the character, appearance and distinctiveness of those areas can be dependent on the detail of developments. Consequently, outline planning applications in Conservation Areas will not be acceptable.

**4.3.7** Conservation Area Statements define and record the features which make each Conservation Area important. Together with the Village Planning Guidance SPDs, they include an analysis of historical development, layout, plot configuration, buildings, shop fronts, memorials, other street furniture, walls and boundaries, open land and civic space. Conservation Area Studies and Management Plans set out proposals for the preservation and enhancement of the character, appearance and distinctiveness of a Conservation Area. Applicants will be expected to demonstrate how the proposal complies with the relevant Conservation Area appraisals, plans and studies, as well as the Village Planning Guidance SPDs, and any other relevant SPDs/SPGs adopted by the Council. These will also be used when assessing proposals within and/or affecting designated heritage assets. The level of detail provided should be proportionate to the importance of the heritage asset.

**4.3.8** Heritage assets are irreplaceable and ill conceived proposals can cause irreversible damage to the character and distinctiveness of the borough's high quality townscape and landscape. Therefore the partial or full demolition of a designated heritage asset, or its alteration, will only be

considered acceptable where full justification has been provided to demonstrate that any harm or loss has been carefully weighed up against wider public benefits that might result from the proposal. Substantial harm to, or loss of, a Grade II Listed Building, Park or Garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably Scheduled Monuments, Grade I and II\* Listed Buildings, Grade I and II\* Registered Parks and Gardens should be wholly exceptional. Insensitive alterations to, or extensions to neighbouring developments of, Listed Buildings will not be allowed.

**4.3.9** Listed Buildings are best used for their original purpose and therefore the Council will resist the change of use of a Listed Building where this would materially harm its character and distinctiveness. It is acknowledged that there may be circumstances where the original use has become obsolete and there may be cases where a change of use may be the only viable option to keep the designated heritage asset in active use. In such instances, the Council will take into account the desirability of sustaining and enhancing the significance of the heritage asset and putting it to a viable use consistent with its conservation. Where a change of use may be appropriate, sensitive adaptation of a historic building can be possible but the onus will be on the applicant to justify the new use and to demonstrate how the benefits outweigh the harm of departing from other planning policies if applicable. Any proposed development, additional structures or buildings within the setting of the designated heritage asset, must only be the minimum necessary to secure the asset's long-term future. The applicant will also have to demonstrate that the new use will be compatible with the fabric, exterior, interior and setting of the designated heritage asset, and that it will not detract from other evidential, historic, aesthetic or communal heritage values.

**4.3.10** Proposals for enabling development relating to designated heritage assets must have benefits that outweigh the disbenefits of departing from other planning policies. The proposed development must be the minimum necessary to secure the designated heritage asset's long-term future.

**4.3.11** Legislation places upon those who own or manage Listed Buildings an obligation to ensure that they are properly maintained. Where appropriate, the Council will use its powers to ensure that this is done, particularly if the asset is on the Heritage at Risk register. Owners are urged to employ specialists to ensure the standard of workmanship in carrying out modifications or additions to designated historic assets is of high quality. A deteriorated state of an asset as a result of deliberate neglect or damage is not taken into account when making decisions. Where the quality of a Conservation Area has been eroded, the Council will take steps to ensure that new development and other schemes such as works to the public realm enhance the historic environment.

#### 4.4 Non-Designated Heritage Assets

##### Why we are reviewing this policy area

The policies relating to non-designated heritage assets, such as Buildings of Townscape Merit and war memorials, are generally in accordance with national policy. There is a need to reflect the national guidance on non-designated heritage assets when assessing harm to such an asset. There is also the opportunity to consolidate and streamline policies relating to non-designated heritage assets (i.e. Buildings of Townscape Merit and war memorials).

##### What the evidence says

Non-designated heritage assets make an important contribution to the borough's unique and distinctive character. They have been identified as having a degree of significance and thus meriting consideration in planning decisions.

The Council has developed a range of SPDs, including on Buildings of Townscape Merit as well as Village Planning Guidance, which provide detailed and locally specific guidance on the implementation of the heritage and conservation policies.

The review and consolidation of the policies provides the opportunity to ensure that the protection of a non-designated heritage asset is consistent with its significance and that the assessment of harm relates to its significance.

#### **Existing Policy DM HD 3 - Buildings of Townscape Merit**

The Council will seek to ensure and encourage the preservation and enhancement of Buildings of Townscape Merit and will use its powers where possible to protect their significance, character and setting, by the following means:

1. consent will not normally be granted for the demolition of Buildings of Townscape Merit;
2. alterations and extensions should be based on an accurate understanding of the significance of the asset including the structure, and respect the architectural character, and detailing of the original building. The structure, features, and materials of the building which contribute to its architectural and historic interest should be retained or restored with appropriate traditional materials and techniques;
3. any proposals should protect and enhance the setting of Buildings of Townscape Merit;
4. taking a practical approach towards the alteration of Buildings of Townscape Merit to comply with the Disability Discrimination Act 2005 and subsequent amendments, provided that the building's special interest is not harmed, using English Heritage advice as a basis.

#### **Existing Policy DM HD 6 - War Memorials**

The Council has recorded all Borough war memorials on a register. Memorials should be retained in situ, if possible or sensitively relocated.

#### **New Policy LP 4**

##### **Non-Designated Heritage Assets**

The Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, and other local historic features. Applicants will be required to:

1. retain the character of Buildings of Townscape Merit, war memorials and any other non-designated heritage assets;
2. assess the potential harm to, or loss of, the significance of the non-designated heritage asset, including from both direct and indirect effects;
3. describe the significance of the non-designated heritage asset affected, including any contribution made by their setting; the extent of the relevant setting will be proportionate to the significance of the asset. Appropriate expertise should be used to assess a non-designated heritage asset; and
4. retain or restore the structures, features and materials of the asset, which contribute to its architectural integrity and historic interest.

**4.4.1** The borough's exceptional historic environment is central to its character. Locally listed buildings, i.e. Buildings of Townscape Merit (BTM), and memorials (particularly war memorials, including those on private land or within buildings) as well as other local historic features such as statues, plaques, horse and cattle troughs, historic bollards, post boxes and historic telephone boxes are historic assets worthy of protection.

**4.4.2** Buildings of Townscape Merit are buildings, groups of buildings or structures of historic or architectural interest, which are locally listed due to their considerable local importance. The Council's adopted SPD on BTMs sets out the criteria that will be taken into account when considering whether a building or structure should be designated as BTM. The Council will resist the inappropriate demolition of BTMs. Should demolition prove necessary, a high standard of design that complements the surrounding area will be required in any replacement building. Locally specific guidance on design and character is set out in the Council's Village Planning Guidance SPDs, which applicants are expected to follow for any alterations and extensions to existing BTMs, or for any replacement structures.

**4.4.3** The Council has recorded all war memorials in the borough on a register. Memorials should be retained in situ, if possible, or sensitively relocated.

#### 4.5 Views and Vistas

##### Why we are reviewing this policy area

Whilst the policy relating to views and vistas is overall in accordance with national policy, there is a need to reflect the national guidance on assessing designated and non-designated heritage assets, including the significance of locally and strategically protected views and vistas. In addition, the current policy mainly focuses on views and vistas as identified on the Proposals Map. There is therefore an opportunity to take account of local views, vistas and gaps that contribute to the special character of the borough.

##### What the evidence says

The overall landscape, views and vistas, particularly the views protected in law, including those portrayed in art and literature, contribute to the unique character of the borough.

##### Existing Policy DM HD 7 - Views and Vistas

The Council will seek to protect the quality of views indicated on the Proposals Map. It will also seek opportunities to create attractive new views and vistas and, where appropriate, improve any that have been obscured.

##### New Policy LP 5

##### Views and Vistas

The Council will protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means:

1. protect the quality of the views and vistas as identified on the Proposals Map;
2. resist development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline;
3. require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced;

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4. require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background;
5. improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured, will be encouraged where appropriate;
6. require development to preserve or enhance views within Conservation Areas, which:
  - a. are identified in Conservation Area Statements and Studies;
  - b. are within, into, and out of Conservation Areas;
  - c. affect the setting of and from development on sites adjacent to Conservation Areas and Listed Buildings.

**4.5.1** The quality and character of the views and vistas as shown on the Proposals Map will need to be protected. In addition, the Council will explore opportunities to create attractive new views and vistas.

**4.5.2** The presence of a view or vista will influence the design quality, configuration, height and site layout of new development or extensions to existing developments. Views may also need to be considered where the viewpoint is a long way from the development, such as in the case of views from Richmond Hill and numerous vantage points in Richmond Park. Where appropriate, improvements, such as opening up or enhancing views for the benefit of the general public where views have been obscured by fencing, buildings or overgrown trees, will be encouraged.

**4.5.3** The Richmond, Petersham and Ham Open Spaces Act (1902) prevents development of the land on and below Richmond Hill in order to protect the unique and distinctive foreground views that it provides to the west and south. This is the only view in England to be protected by an Act of Parliament. In addition, the view from King Henry VIII's Mound to St Paul's Cathedral is the subject of a Direction made by the Secretary of State as part of strategic guidance and is one of eight such strategic views of St Paul's across London. The protection and enhancement of the

strategic view from King Henry's Mound to St Paul's will be achieved by consultation between boroughs. The London View Management Framework SPG will be used when considering applications affecting protected views.

**4.5.4** It is important that the impact of development on views, including in and around Conservation Areas, as well as of landmarks defining points of townscape interest is taken into account. In addition to the strategic view from King Henry's Mount in Richmond Park to St Paul's Cathedral, the borough also has specifically recognised views and vistas that are important to protect.

**4.5.5** The Council will work in partnership with neighbouring boroughs where there are cross-boundary views and settings so that these are positively managed.

**4.5.6** This policy complements other design and conservation policies. The Council will take account of wider urban design considerations, and the setting of designated heritage assets, in addition to the views and vistas identified on the Proposals Map. Locally designated and protected views and vistas will be identified in the forthcoming SPD on Views and Vistas.

### 4.6 Royal Botanic Gardens, Kew World Heritage Site

#### Why we are reviewing this policy area

Whilst the policy relating to Royal Botanic Gardens, Kew World Heritage Site (WHS) is overall in accordance with national policy, there is a need to reflect the national guidance on designated heritage assets, particularly in relation to the assessment of harm and substantial harm relating to the significance of the heritage asset.

Whilst there is an opportunity to consolidate policies relating to designated heritage assets, given the uniqueness of Royal Botanic Gardens, Kew World Heritage Site, it is considered preferable to retain a separate policy.



### What the evidence says

There is a need to protect, promote, conserve and where appropriate enhance the Royal Botanic Gardens Kew, World Heritage Site (WHS). It is recognised that the policy could expand on the outstanding universal value of the WHS. There is also a need to include a map of the designated WHS, and its buffer zone, to ensure that development proposals take account of and comply with the Royal Botanic Gardens, Kew Landscape Master Plan (2010) and the Royal Botanic Gardens, Kew World Heritage Site Management Plan (2014).

As part of a positive strategy for the historic environment, it is important to ensure that known and potential threats to the borough's heritage designated assets are addressed. In this context, the protection of the setting of the WHS, including the cross-boundary issues in relation to tall building proposals in Brentford and Hounslow's Great West Corridor, will be of importance. There is a need to ensure there is an understanding that the setting of the WHS is more extensive than the defined buffer zone, and this should be defined within the policy.

### Existing Policy DM HD 5 - World Heritage Site

The Council will work with others, to protect, promote, interpret, sustainably use, conserve and where appropriate enhance the Royal Botanic Gardens Kew World Heritage Site and its setting including the buffer zone by conserving its Outstanding Universal Value, integrity, authenticity and significance.

Development proposals should not cause adverse impact to the World Heritage Site or its setting that would compromise its Outstanding Universal Value, integrity, authenticity and significance, and give appropriate weight to the World Heritage Site Management Plan.

### New Policy LP 6

#### Royal Botanic Gardens, Kew World Heritage Site

The Council will protect, conserve, promote and where appropriate enhance the Royal Botanic Gardens, Kew World Heritage Site, its buffer zone and its wider setting.

The highest significance in terms of the importance as a designated heritage asset is attributed to Royal Botanic Gardens, Kew World Heritage Site. Development proposals should not cause any adverse impact to the World Heritage Site or its setting that would compromise its Outstanding Universal Value, integrity, authenticity and significance. Appropriate weight will be given to the Royal Botanic Gardens, Kew World Heritage Site Management Plan and the Royal Botanic Gardens, Kew Landscape Master Plan.

**4.6.1** The United Nations Educational, Scientific and Cultural Organisation (UNESCO) World Heritage Committee inscribes World Heritage Properties onto its World Heritage List for their Outstanding Universal Value – *cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity*. The Royal Botanic Gardens, Kew was inscribed on the UNESCO World Heritage Site List in 2003, in recognition of its outstanding and internationally significant universal value.

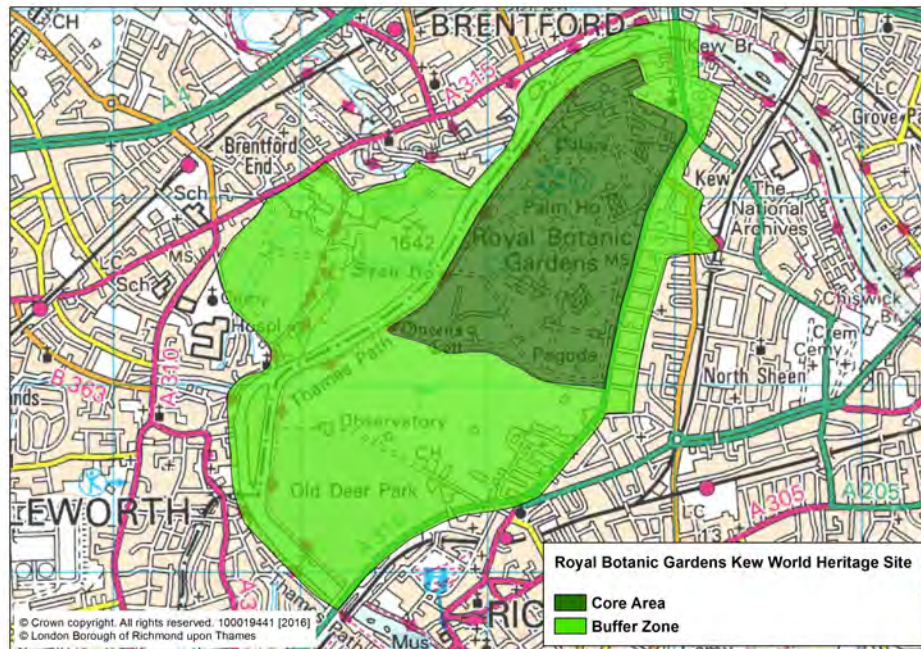
**4.6.2** The outstanding international importance of the WHS is a key material consideration to be taken into account by the Council when determining planning applications and Listed Building Consents. The Council will protect and, where possible, enhance the WHS for the benefit of future generations by carefully scrutinising development proposals for their likely effect on the site or its setting where these occur within:

- a. The designated WHS, as shown in the figure below ('Core Area');

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- b. The defined buffer zone, as shown in the figure below ('Buffer Zone'); and
- c. The wider and more extensive setting of the WHS, including views to and from the site.



**4.6.3** The Royal Botanic Gardens, Kew World Heritage Site Management Plan and the Landscape Master Plan provide a framework for guiding the activities that take place in the site in order to ensure that these activities do not conflict with the need to protect the qualities, which make the Royal Botanic Gardens, Kew such a special and unique place.

**4.6.4** As part of the positive strategy for the conservation and enjoyment of the historic environment, national policy guidance requires the consideration of designated heritage assets most at risk through neglect, decay or other threats. In this context, the Council will work closely with its partners, including Historic England and the London Borough of

Hounslow, to ensure that the Royal Botanic Gardens, Kew WHS, including its buffer zone, wider setting and views to and from the site, is given the highest significance as a designated heritage asset, and to prevent any further harmful impacts from development proposals, particularly as a result of inappropriate and unsympathetic tall buildings, in Brentford and Hounslow's wider Great West Corridor.

### 4.7 Archaeology

#### Why we are reviewing this policy area

Whilst the policy relating to archaeology is overall in accordance with national policy, there is a need to reflect the national guidance on designated and non-designated heritage assets, particularly in relation to the assessment of harm and substantial harm being related to the significance of the heritage asset.

There is an opportunity to consolidate policies relating to the historic environment and heritage assets. However, based on discussions with the Greater London Archaeology Advisory Service (GLAAS), the preference is to retain a separate policy dealing with archaeological planning matters.

#### What the evidence says

National policy guidance identifies two categories of sites that are of archaeological interest:

1. Those that are demonstrably of equivalent significance to Scheduled Monuments and are therefore considered subject to the same policies as those for designated heritage assets; and
2. Other non-designated heritage assets of archaeological interest, which are of lesser heritage significance, but should be subject to heritage policies. On occasion the understanding of a site may

change following assessment and evaluation prior to a planning decision and move it from this category to the first.

The borough's Archaeological Priority Areas (APAs) are due to be reviewed in 2018 by GLAAS as part of a rolling programme of reviews across London. Whilst there may be a benefit of including the APA map within the Local Plan, as the current APAs are out of date and no longer contain a reliable data set, the Local Plan will provide a link to the latest available information.

#### **Existing Policy DM HD 4 - Archaeological Sites**

The Council will seek to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public. It will take the necessary measures required to safeguard the archaeological remains found, and refuse planning permission where proposals would adversely affect archaeological remains or their setting.

#### **New Policy LP 7**

##### **Archaeology**

The Council will seek to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public. It will take the necessary measures required to safeguard the archaeological remains found, and refuse planning permission where proposals would adversely affect archaeological remains or their setting.

Desk based assessments and, where necessary, archaeological field evaluation will be required before development proposals are determined, where development is proposed on sites of archaeological significance or potential significance.

**4.7.1** Archaeological investigations in the borough to date have revealed evidence of prehistoric, Roman, Saxon, Medieval and post Medieval archaeology. An archaeological site is a place (or group of physical sites) in which evidence of past activity is preserved and can include industrial sites, marine and foreshore deposits/structures, buildings, machinery, roads, artefacts, wartime structures and modest domestic buildings. The preservation of archaeological remains is a material consideration when determining planning applications. As set out in national policy guidance, archaeological remains of national importance should be preserved in situ. While it is desirable to treat all remains in this manner, it is recognised that it is not always practical to do so.

**4.7.2** However, regardless of their status, established procedures of consultation and evaluation as set out in national policy guidance and other advice must be followed in preparing development proposals. Prospective applicants should make an initial assessment of the archaeological potential and significance of a site by consulting with the appropriate specialist bodies, Historic England and the Greater London Archaeological Advisory Service (GLAAS). GLAAS is the borough's archaeological advisers and should be consulted with regard to archaeological matters.

**4.7.3** Archaeological Priority Areas (APAs) can be identified by local planning authorities under the Town and Country Planning Act 1990 and the borough's APAs are shown on the Archaeological Constraints Map. The borough's APAs are due to be reviewed in 2018 by GLAAS as part of a rolling programme of reviews across London. The Council will therefore provide a link to the latest available APAs constraints map.

#### 4.8 Amenity and Living Conditions

##### Why we are reviewing this policy area

There is a need to protect occupiers of properties from development that could lead to unreasonable loss of privacy, visual intrusion, pollution, noise, disturbance and overshadowing. This also includes managing impacts related to the borough's evening economy.

Reviewing this policy area provides the opportunity to define unneighbourly, overbearing, overlooking, habitable rooms, outlook, private view and other common terminology that is used to describe potential impacts on amenity and living conditions.

##### What the evidence says

There is a need to manage residents' expectations and set out clearly on what grounds an application may be refused. The Building Research Establishment (BRE) tests in relation to site layout planning for daylight and sunlight should be clarified. Adding balconies retrospectively is usually unacceptable on grounds of unneighbourliness and loss of privacy.

##### Existing Policy DM DC 5 - Neighbourliness, Sunlighting and Daylighting

In considering proposals for development the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance.

To protect privacy, for residential development there should normally be a minimum distance of 20 m between main facing windows of habitable rooms.

The Council will generally seek to ensure that the design and layout of buildings enables sufficient sunlight and daylight to penetrate into and between buildings, and that adjoining land or properties are protected from overshadowing in accordance with established standards.

##### Existing Policy DM DC 6 - Balconies and Upper Floor Terraces

Purpose built, well designed and positioned balconies or terraces are encouraged where new residential units are on upper floors. They should be:

- sufficiently deep to allow adequate access and circulation around furniture.
- preferably located next to a dining or living space
- preferably receive direct sunlight
- designed to provide some shelter and privacy to neighbouring properties, either by using screens or by setting the balcony back within the façade
- balustrades designed to screen stored items from view
- designed for security and safety

The addition of balconies and upper floor terraces to existing properties will not generally be permitted unless the above apply and they do not adversely affect neighbourliness (see Neighbourliness, Sunlighting and Daylighting).



## New Policy LP 8

### Amenity and Living Conditions

All development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties. The Council will:

1. ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development; where existing daylight and sunlight conditions are already substandard, there should be no material worsening of the conditions;
2. ensure there is a minimum distance of 20 metres between main facing windows of habitable rooms (this includes living rooms, bedrooms and kitchens with a floor area of 13sqm or more) and reasonable visual privacy for occupants of new development and for occupants of existing properties affected by new development;
3. ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting, including through creating a sense of enclosure;
4. ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climatic effects.

Applicants are expected to comply with the Council's SPDs relating to design, including Village Planning Guidance, SPDs on extensions, infill and backland developments, housing mix and standards as well as residential development standards.

**4.8.1** This policy covers all development, including extensions, alterations and changes of use. The aim is to protect the living conditions and amenity of occupants of new, existing, adjoining and neighbouring buildings as far as possible from the unreasonable impacts of new development.

**4.8.2** The Council will support proposals for development that protect the amenity of both its future occupiers and the occupiers of adjoining properties. The term 'property' encompasses both the building as well as its curtilage.

**4.8.3** New buildings and extensions need to take careful account of the amenity and living conditions of neighbours, with particular regard to natural light, light pollution, privacy, noise and disturbance. Adverse impacts on neighbouring properties and their occupiers, including on the most well used part of residential gardens, can include actual and perceived loss of light (including to solar panels), overlooking, loss of privacy, alterations to micro-climates, pollution from noise or light as well as by creating a sense of enclosure, or through overpowering, overbearing or obtrusive development. This could be from the new development itself or from associated development and uses such as ancillary buildings, parking areas, access ways, gardens, communal open space and hard and soft landscaping.

**4.8.4** Particular attention needs to be paid to these matters in order to address public concerns in relation to amenity and living conditions impacts. However, setting fixed standards could undermine the Council's duty ability to maintain, and where appropriate, enhance the character, appearance and distinctiveness of the borough, particularly of Conservation Areas. It is the overall design, taking all factors into account including the area's character, that will be the determinant of whether a proposal provides reasonable amenity and living conditions.

### Daylight and sunlight

**4.8.5** In assessing whether sunlight and daylight conditions are good, both inside buildings and in gardens and open spaces, the Council will have regard to the most recent Building Research Establishment guidance,



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both for new development, and for properties affected by new development. In some circumstances, mathematical calculations to assess daylighting and sunlighting may be an inappropriate measure, and an on-site judgement will often be necessary.

#### Visual intrusion, privacy and outlook

**4.8.6** An overbearing, overpowering or over-dominant development can significantly reduce the quality of living conditions both inside and outside, in new as well as existing developments. The degree of overlooking depends on the distance and the horizontal and vertical angles of view. The impact on the sense of enclosure will often be dependent on on-site judgement.

**4.8.7** Whilst there will be some impact from any new development, the test is one of harm in relation to the impact on habitable rooms, which includes all separate living rooms and bedrooms, plus kitchens with a floor area of 13sqm or more. The minimum distance of 20 metres between habitable rooms within residential development is for privacy reasons; a greater distance may be required for other reasons, or a lesser distance may be acceptable in some circumstances. The distance of 20 metres is generally accepted as the distance that will not result in unreasonable overlooking. Where principal windows face a wall that contains no windows or those that are occluded (e.g. bathrooms), separation distances can be reduced to 13.5 metres.

**4.8.8** Privacy of gardens and courtyards is also important. However, public spaces and communal amenity areas will benefit from a degree of overlooking due to the increased level of surveillance it can provide.

**4.8.9** Balconies or terraces on roofs of main buildings can be visually intrusive and result in serious intrusion into the privacy and quiet enjoyment of neighbouring residential properties.

**4.8.10** Outlook is the visual amenity enjoyed by occupants when looking out of their windows or from their garden; how pleasant an outlook is depends on what is being viewed. Loss of daylight/sunlight (based on

Building Research Establishment guidance), overshadowing, loss of outlook to the detriment of residential amenity are material planning considerations; however, the loss of a private view from a property is not protected.

**4.8.11** The Council's SPDs, including on Householder Extensions and External Alterations, Residential Development Standards as well as on Small and Medium Housing Sites, provide further guidance and illustrations on how to assess sunlight/daylight, overshadowing, visual intrusion, privacy and space between buildings.

### 4.9 Floodlighting

#### Why we are reviewing this policy area

There continues to be a need for a policy on floodlighting. This should set out criteria to enable the consideration of benefits and impacts of floodlighting provision.

#### What the evidence says

The Council's Playing Pitch Strategy (last updated in 2015) identified the need for floodlighting to maximise winter play and to meet demand for specific sports. Therefore, it is proposed to add an additional criterion to the policy to allow the Council to assess whether a proposal for floodlighting would meet identified needs as set out within the Council's Playing Pitch Strategy.

#### Existing Policy DM OS 9 - Floodlighting

Floodlighting of sports pitches, courts and historic and other architectural features will be permitted unless there is demonstrable harm to character, biodiversity or residential amenity.

The following criteria will be taken into account when assessing floodlighting:

- benefits and impacts of the provision of floodlighting on the wider community
- benefits and effects on the use and viability of the facility
- impacts on biodiversity and wildlife
- impacts on residential amenity and wider public
- impacts on local character

Favourable consideration will be given to the replacement or improvement of existing lighting to minimise impacts.

## New Policy LP 9

### Floodlighting

Floodlighting of sports pitches, courts and historic and other architectural features will be permitted unless there is demonstrable harm to character, biodiversity or amenity and living conditions.

The following criteria will be taken into account when assessing floodlighting:

1. the impacts on local character or historic integrity;
2. the impacts on amenity and living conditions;
3. the impacts on biodiversity and wildlife;
4. the benefits and impacts of the provision of floodlighting on the wider community;
5. the benefits and effects on the use and viability of the facility;
6. that it meets an identified need as set out within the council's playing pitch strategy;

Favourable consideration will be given to the replacement or improvement of existing lighting where it provides improvements to existing adverse impacts.

**4.9.1** Floodlighting can enable the full use of outdoor sport and leisure facilities, but consideration must be given to any demonstrable harm to biodiversity, amenity and local character.

**4.9.2** Factors which will be taken into account when assessing proposals for floodlighting will be:

- The benefits: the need for lighting has to be demonstrated by the applicant. Issues to consider are: how many people will use or enjoy the facility, for how many hours a week and for what purpose; what would be the wider benefits of the provision; will it affect the viability of the facility; will it create fuller use of the facility; will it create sports development and health activities; will it create coaching or opportunities for youth activities; will it enhance the appreciation of the historic or architectural heritage of the borough; will it enhance security and safety; does it meet an identified need as set out within the Council's Playing Pitch Strategy;
- Effect on biodiversity: is it within or adjacent to an area designated as important for biodiversity (habitats and species); what would be the impacts on species and habitats;
- Effect on the wider area: is it within or adjacent to a designated heritage asset; is it within the Thames Policy Area, Green Belt, Metropolitan Open Land; would it have a significant adverse effect on these designations;
- Effect on amenity and living conditions: effects and impacts when lit in terms of sky glow, glare (including the glare caused by light bouncing off a surface), light trespass, noise and disturbance from users; the appearance of the installation when switched off;

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- Energy usage and energy efficiency (the use of low energy lighting will be expected);
- Any planned mitigation measures such as restriction on lighting levels and hours of use.

**4.9.3** It is important that floodlights are designed to be as unobtrusive as possible when unlit, in terms of number, height, width, design, colour and siting. Light pollution should be minimised to protect biodiversity as well as occupiers of properties, passers by and vehicle users using best available lighting technologies in terms of impact and energy efficiency. Innovative, smart lighting technologies which create a better spread and focus and have less impact on the environment will be required. Applicants are referred to guidance notes published by the Institution of Lighting Engineers such as the Guidance Notes for the Reduction of Obtrusive Light as well as the guidance produced by Sport England and the Institution of Lighting Engineers on Artificial Sports Lighting.

**4.9.4** If permission is granted, conditions or Planning Obligations may be imposed to restrict the lighting levels and times of use, or to implement other measures to minimise possible adverse effects such as post-installation requirements and monitoring, both within the site and on adjoining land.

### 4.10 Local Environmental Impacts, Pollution and Land Contamination

#### Why we are reviewing this policy area

There is currently very limited policy guidance at a local level, with the main focus being that local environmental impacts of development with respect to factors such as noise, air quality and contamination should be minimised and mitigated. In addition, the existing policy relating to neighbourliness is also used for any applications relating to pollution issues, including noise and disturbance.

The evidence suggests that there is a need for a local policy and guidance that deals with pollution matters and which protects and enhances the quality of the local environment in respect to matters such as air pollution, noise pollution, vibration, light pollution and land contamination whilst promoting and supporting sustainable development. This should also cover appropriate elements relating to managing impacts of construction.

The evidence also suggests there is a need for additional guidance to be set out in a SPD in relation to local environmental impacts and pollution, to provide clarity for applicants as to what may be required of them. This could also cover construction management considerations.

#### What the evidence says

National policy guidance states that the planning system should contribute to and enhance the environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

The London Plan contains specific policies on pollution matters and some guidance is also contained within the Mayor's Sustainable Design and Construction SPG.

#### Air pollution:

- National policy guidance states that planning policies should comply with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.

- Regional policy guidance states that boroughs should have policies that seek reductions in levels of pollutants and address the requirements of Air Quality Action Plans and Management Areas.
- The Mayor's Air Quality Strategy states that new developments should contribute to achievement of air quality objectives, minimise increased exposure to existing poor air quality, ensure air quality benefits are realised through developer contributions and mitigation measures are secured through planning conditions.
- At a local level, there is a need to ensure development supports the borough's Air Quality Action Plan and address exceedances of poor air quality in relevant parts of the borough.

#### **Noise pollution:**

- National policy guidance states that policies should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; guidance also states that the Local Plan can include specific local noise standards to apply to various forms of proposed development and locations in their area.
- Regional policy guidance states that boroughs should have policies to manage the impact of noise through the spatial distribution of noise making and noise sensitive uses.
- At a local level, there is a need for policy guidance that provides more detail and clarity with regard to noise pollution (this relates to existing and future residents' living conditions as well as sensitive receptors such as hospitals and schools). The Council is also in the process of developing a specific SPD on Noise.

#### **Light pollution:**

- There is no specific national policy on light pollution; however, there is national guidance on light pollution (as set out in the PPG), including advice on how to consider the impact of artificial light to avoid nuisance.

- There is no specific London Plan policy on light pollution although some guidance is contained within the Mayor's Sustainable Design and Construction SPG, including on types of light pollution, the potential harmful effects, and how to design lighting appropriately to minimise nuisance.
- At a local level, there is a need to specifically address light pollution in policy as this is now considered part of the statutory nuisance agenda relating to both existing and future residents' living conditions.

#### **Land contamination:**

- National policy guidance states that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the applicant/developer and/or landowner.
- There is detailed national guidance on contamination (as set out in the PPG), which requires investigations of land potentially affected by contamination to be carried out in accordance with established procedures (such as BS10175 (2001) Code of Practice for the Investigation of Potentially Contaminated Sites). The minimum information that should be provided by an applicant is the report of a desk study and site reconnaissance.
- Regional policy guidance states that boroughs should encourage the remediation of contaminated sites and sets out policies to deal with contamination. In addition, the Mayor's Sustainable Design and Construction SPG states that applicants should set out how existing land contamination will be addressed prior to the commencement of development.
- At a local level, there is a need for a policy that provides more detail and clarity in relation to land contamination.

#### **Construction management:**

- There is no specific national policy or guidance; however, other legislation does apply such as The Highways Act, The Building

Regulations, Environmental Pollution and Control legislation, BS5228 Control of Noise from Construction and Demolition Sites, Control of Pollution Act 1974 etc.

- There is no specific London Plan policy but the Control of Dust and Emissions during Construction and Demolition SPG outlines good practice for construction sites and controlling emissions including noise.
- Whilst issues of construction management are usually dealt with as part of a planning condition, the Council has already adopted a Local Validation Checklist, which requires all major applications as well as all applications for basement and subterranean developments to submit a Construction Management Statement. There may however still be a need to address the development stage and the impact upon local residents from noise, dust and fumes, including potential impacts relating to air quality, vibration and potentially congestion and road safety, either within a local policy or within a local SPD.

#### **Existing Policy CP1 - Sustainable Development (part extract)**

##### **1.D Reducing environmental impact**

Minimising local environmental impacts of development with respect to factors such as noise, air quality and contamination.

#### **Existing Policy DM DC 5 - Neighbourliness, Sunlighting and Daylighting (part extract)**

In considering proposals for development the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance.

### **New Policy LP 10**

#### **Local Environmental Impacts, Pollution and Land Contamination**

A. The Council will seek to ensure that local environmental impacts of all development proposals do not lead to detrimental impacts on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land. These potential impacts can include, but are not limited to, air pollution, noise and vibration, light pollution, odours and fumes as well as land contamination.

Developers should follow any guidance provided by the Council on local environmental impacts and pollution as well as on noise generating and noise sensitive development. Where necessary, the Council will set planning conditions to reduce local environmental impacts on adjacent land uses to acceptable levels.

#### **Air Quality**

B. The Council promotes good air quality design and new technologies. Developers should commit to 'Emissions Neutral' development where practicable. To consider the impact of introducing new developments in areas already subject to poor air quality, the following will be required:

1. an air quality impact assessment, including where necessary, modelled data;
2. mitigation measures to reduce the development's impact upon air quality, including the type of equipment installed, thermal insulation and ducting abatement technology;
3. measures to protect the occupiers of new developments from existing sources;
4. strict mitigation for developments to be used by sensitive receptors such as schools, hospitals and care homes in areas



of existing poor air quality; this also applies to proposals close to developments used by sensitive receptors.

### **Noise and Vibration**

C. The Council encourages good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected. The following will be required, where necessary:

1. a noise assessment of any new plant and equipment and its impact upon both receptors and the general background noise levels;
2. mitigation measures where noise needs to be controlled and managed;
3. time limits and restrictions for activities where noise cannot be sufficiently mitigated;
4. promotion of good acoustic design and use of new technologies;
5. measures to protect the occupiers of new developments from existing sources.

### **Light Pollution**

D. The Council will ensure that artificial lighting in new developments does not lead to unacceptable impacts by requiring the following, where necessary:

1. an assessment of any new lighting and its impact upon any receptors;
2. mitigation measures, including the type and positioning of light sources;
3. promotion of good lighting design and use of new technologies.

### **Odours and Fume Control**

E. The Council will ensure that any potential impacts relating to odour and fumes from commercial activities are adequately mitigated by requiring the following:

1. an impact assessment where necessary;
2. the type and nature of filtration to be used;
3. the height and position of any chimney or outlet;
4. promotion and use of new abatement technologies;

### **Land Contamination**

F. The Council promotes the remediation of land where development comes forward. Potential contamination risks will need to be properly considered and adequately mitigated before development proceeds.

### **Construction and demolition**

G. The Council will seek to manage and limit environmental disturbances during construction and demolition as well as during excavations and construction of basements and subterranean developments. To deliver this the Council requires the submission of Construction Management Statements for the following types of developments:

1. all major developments;
2. any basement and subterranean developments;
3. developments of sites in confined locations or near sensitive receptors; or
4. if substantial demolition/excavation works are proposed.

**4.10.1** Developers should explore ways to minimise any adverse environmental impacts of development, including during construction and demolition. Where possible, development that is likely to generate pollution should be located away from sensitive uses such as hospitals, schools, care homes and wildlife sites. The design and layout of new development

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should minimise conflict between different land uses, taking account of users and occupiers of new and existing developments. Therefore, any noisy or polluting activities or features such as plant equipment, should be positioned away from sensitive areas where possible to ensure any detrimental impacts on health, living conditions or amenity are kept to acceptable levels.

**4.10.2** In addition, where there are already significant adverse effects on the environment, amenity or living conditions due to pollution, sensitive uses should ideally be steered away from those areas. However, given the limited availability of land for development in this borough, this will not always be possible. Therefore, new developments, including changes of use, should mitigate and reduce any adverse impacts resulting from air and light pollution, noise, vibration and dust to acceptable levels.

**4.10.3** The Council will be preparing SPDs on local environmental impacts, pollution and noise, which will contain further guidance and clear requirements, including methodologies, for the various assessments that may need to be submitted as part of certain types of planning applications.

#### **Air Quality**

**4.10.4** Good air quality is vital to the health and wellbeing of the borough. There are a number of areas in the borough that do not comply with the air quality targets and action must be taken to control, minimise and reduce the contributing factors of poor air quality.

**4.10.5** The whole of the borough has been declared as an Air Quality Management Area (AQMA) and as such any new development and its impact upon air quality must be considered very carefully. The Council will consider the impact of introducing new developments to areas already subject to poor air quality, and the impact on the new occupiers of that development, especially in sensitive uses such as schools.

**4.10.6** The Council will seek financial contributions through the use of Planning Obligations towards air quality measures where a proposed development is not air quality neutral or mitigation measures do not reduce the impact upon poor air quality.

#### **Noise and Vibration**

**4.10.7** Noise and/or vibration arise from a variety of sources, such as major roads, railways and aircraft, as well as industrial and commercial sources. This can have a significant effect on health, quality of life, amenity, living conditions and the environment in general. Therefore this needs to be considered when new developments may create noise and vibration, and also when new developments would be sensitive to existing conditions.

**4.10.8** Applicants need to consider acoustic design at an early stage of the planning process to ensure occupiers of new and existing noise sensitive buildings are protected.

**4.10.9** The Council is in the process of developing a SPD for Noise Generating and Noise Sensitive Development. This sets out guidance intended to help protect the local occupiers of new or existing noise sensitive buildings from existing or introduced noise sources, and, where possible, improve amenity and living conditions. The SPD will assist applicants, decision makers, agents, occupiers and others to identify issues to be addressed in any planning application in which noise and/or vibration will be an important consideration.

**4.10.10** The Council will protect existing businesses and industrial uses in line with the Employment policies set out in this Plan. Businesses should not have unreasonable restrictions put on them because future noise sensitive uses are subsequently permitted adjacent to the business or within the surrounding area; this also includes changes of use. Therefore, proposed new noise sensitive developments should follow good acoustic design principles and incorporate adequate mitigation measures to ensure appropriate acoustic conditions in new developments.

#### **Light Pollution**

**4.10.11** Though an important part of the urban environment, light pollution when not controlled, is poorly designed or positioned incorrectly can have a detrimental effect upon occupiers and residents. As part of the development process steps must be taken to ensure that the impact of artificial lighting is considered carefully.

### **Odours and Fume Control**

**4.10.12** Some commercial activities can have an impact upon the local environment; these impacts can include such things as odours, fumes, dust and steam. As part of the development process steps must be taken to ensure that any impact is considered carefully and that mitigation is in place to manage these types of emissions.

**4.10.13** Applicants will be required to apply the Department for Environment, Food & Rural Affairs' (DEFRA) Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems.

### **Land Contamination**

**4.10.14** A wide range of uses have occurred in the borough throughout its history and there are areas where small scale industrial uses, such as factories, garages, manufacturing works and wharves were once present, and which may have left a legacy of contamination. All new development in the borough is envisaged to take place on previously developed land (i.e. brownfield sites) and therefore remediation is encouraged. The duty to ensure that a safe development is secured on a site that is affected by contamination rests with the developer.

**4.10.15** The Council promotes the remediation of land where development comes forward. Potential contamination risks will need to be properly considered and adequately mitigated before development proceeds.

**4.10.16** To deliver this the Council will:

- require a desk top study and preliminary risk assessment, including an assessment of the site's history, potential contamination sources, pathways and receptors;
- where necessary, require a site investigation and detailed risk assessment in line with current best practice guidance, including where appropriate physical investigations, chemical testing and assessments of ground gas risks and risks to groundwater;
- where necessary, require a remediation strategy that sets out how any identified risks from the reports above are going to be addressed;
- where necessary, require a validation report once remediation has taken place, including evidence that demonstrates that risks from contamination have been controlled effectively; and
- require all above reports and investigations to be carried out by a competent person.

### **Construction and demolition**

**4.10.17** There is a need to ensure that occupiers are protected from environmental disturbances during the construction and demolition phase of major developments, and in particular during excavating and construction of subterranean developments such as basements.

**4.10.18** The Council requires the submission of Construction Management Statements for the types of developments as set out in the policy. In addition, the Council's Good Practice Guide on Basement Developments sets out guidance to ensure that problems relating to excavation and constructions of basements, such as highway/parking impacts, noise, dust, vibration and disturbance to neighbours, are avoided. Developers of basements are also expected to sign up to a Considerate Construction Scheme.

**4.10.19** The Council may also consider requiring a Construction Logistics Plan (CLP) in areas that are subject to high traffic congestion to ensure that vehicles entering the site do not adversely impact on local traffic.

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**4.10.20** The Council may also require a management plan that sets out how developers monitor dust, noise and vibration, and where necessary take the appropriate action if issues arise.

**4.10.21** It will also be necessary to control the hours of operation for noisy site works and the processes that would need to be followed in order to work outside these hours when and if required.

**4.10.22** As part of the Council's commitment to better air quality, the Council will also request, through planning conditions, that the GLA Regulation relating to Non Road Mobile Machinery (NRMM) is imposed where necessary.

### 4.11 Subterranean Developments and Basements

#### Why we are reviewing this policy area

There is currently no specific policy guidance at a local level dealing with basements and other subterranean developments. There is also no national policy or guidance although other national legislation such as The Party Wall Act, The Highways Act, The Building Regulations, Environmental Pollution and Control legislation may apply to basement developments. At a London-wide level, the Mayor's Sustainable Design and Construction SPG (2014) contains some guidance on basements and lightwells and The Control of Dust and Emissions during Construction and Demolition SPG (2014) may also be relevant.

In parts of the borough, particularly Barnes and Kew, some residents are concerned about the impacts of basement and subterranean developments. The Council has already taken reasonable steps to manage their impacts. However, the evidence suggests that there is a need for a local policy and guidance that deals specifically with basements and subterranean developments. It is also proposed to add specific guidance in relation to basements and subterranean developments within the flood risk policy.

It should be noted that a Scrutiny Panel will be set up to investigate basement and subterranean developments in the borough. It is envisaged that the outcomes and findings of the Scrutiny Panel will provide further evidence and recommendations with regard to the inclusion of a specific basement and subterranean development policy as part of the Local Plan.

#### What the evidence says

- The Council commissioned consultants in 2014 to undertake an independent review of the planning implications of basement developments and the options for the Council. This study sets out short, medium and long-term recommendations. Preparing DPD level guidance as part of the Local Plan is one of the long-term recommendations of this Study.
- The Council developed and published a Good Practice Guide on Basement Developments, which provides advice on planning as well as non-planning matters for developers / applicants and for neighbours / residents.
- The Council's Local Validation Checklist as published in 2015 sets out a specific requirement for a Construction Management Statement for all basement applications and Structural Impact Assessments under or adjacent to listed buildings.
- The Council updated the House Extensions and External Alterations SPD in 2015, which also includes new sections on basements and lightwells.
- The Council has set up a dedicated webpage on basements, providing guidance and advice for applicants and residents.

## New Policy LP 11

### Subterranean developments and basements

A. The Council will resist subterranean and basement development of more than one storey below the existing ground level to residential properties or those which were previously in residential use.

B. Proposals for subterranean and basement developments will be required to comply with the following:

1. not extend beneath a maximum of 50% of the existing garden land or more than half of any other undeveloped garden area (this excludes the footprint of the original building);
2. Demonstrate the scheme safeguards the structural stability of the existing building, neighbouring buildings and other infrastructure, including related to the highway and transport; a Structural Impact Assessment will be required where a subterranean development or basement is added to, or adjacent to, a Listed Building.
3. use natural ventilation and lighting where habitable accommodation is provided;
4. include a minimum of 1 metre naturally draining permeable soil above any part of the basement beneath the garden area, together with a minimum 200mm drainage layer, and provide a satisfactory landscaping scheme;
5. demonstrate as part of a Construction Management Statement that the development will be designed and constructed so as to minimise the impact during construction and occupation stages (in line with the Local Environmental Impacts, Pollution and Land Contamination policy of this Plan);

C. Proposals for subterranean and basement developments, including extensions, as well as lightwells and railings, will be assessed against the advice set out in the Council's SPDs relating to character and

design as well as the relevant Village Planning Guidance. Applicants will be expected to follow the Council's Good Practice Guide on Basement Developments.

**4.11.1** This policy applies to all new basement developments, including the construction or extension of one or more storeys below the prevailing ground level of a site or property. Subterranean and other basement developments are considered to be 'development' as defined by the Town and Country Planning Act 1990 as amended. Therefore, planning permission is required for the carrying out of basement developments.

**4.11.2** The development of basements in residential areas is becoming an increasingly popular way of gaining additional space in homes without the need to relocate to larger properties as well as for increasing the value of a property. The shortage of land for development as well as high land values in the borough, coupled with constraints imposed by heritage designations, has led to an increase in the number of applications for basement developments in recent years, whereby the vast majority of these relate to new, or extensions to existing basements, under existing dwellings within established residential areas.

**4.11.3** The addition of basements to existing properties is considered to exacerbate the issue of rising residential land and property values in this borough, thus creating even more homes that are not affordable for local communities, and it also contributes to the loss of small family dwellings. Therefore, limiting the size and extent of a basement also ensures that the special character of this borough is preserved and that proposals do not lead to over-development or inappropriate intensification of existing properties.

**4.11.4** Adding basements to existing properties, particularly multiple basements in a residential street or area, can significantly change the character as well as the social dynamics of an area, and can cause significant impacts to living conditions of residents in neighbouring properties. Therefore, this policy restricts the depth of the basement



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excavation to a single storey where it relates to residential properties or those which were previously in residential use. In this policy, a 'single storey' is one that cannot be subdivided in the future to create additional floors (approximately 2.7 metres floor to ceiling height).

**4.11.5** The policy acknowledges that basements and subterranean developments, including potentially those of more than one storey, can be constructed and used without adverse impacts on the living conditions and amenity of neighbours, provided that the proposal is appropriate for the character of the area and the site allows for appropriate access for plant and machinery to enable construction without adverse impacts.

**4.11.6** In addition, this borough is characterised by low-rise residential areas that benefit from garden areas. Garden areas contribute significantly to the special character and uniqueness of this borough, including the character of conservation areas and settings of heritage assets. They also provide green oases and tranquil areas for residents as well as health benefits, and they contribute to the borough's green infrastructure network due to their biodiversity value. The importance of garden areas in this borough is also established by virtue of some being designated as Other Open Land of Townscape Importance. In addition, policy LP 39 in 9.6 'Infill, Backland and Backgarden Development' sets out a general presumption against backland development, particularly on garden land. While basements may not have a detrimental impact on the openness of an area, they can introduce a degree of artificiality into the garden area and restrict the range of trees and other planting. Therefore, this policy requires the retention of at least half of each garden to enable natural landscapes and the character to be maintained. In addition, this enables the treatment of surface water as close to its source as possible by retaining the infiltration capacity of the un-excavated area of the garden, thus ensuring that proposals do not increase surface water flows onto adjoining properties.

**4.11.7** To support appropriate planting and vegetation as well as to allow for sustainable drainage, the Council will require a soil depth over any part of the basement beneath a garden of a minimum of 1 metre, together with a minimum 200mm drainage layer. This will allow for both a reduction in

the amount as well as speed of surface water runoff, whereby the surface water drainage regime above the basement should be connected to the unaffected part of the garden area.

**4.11.8** All basement and subterranean development should be installed with a pumped sewerage system to prevent flooding from back flow in public sewerage system as recognised in Part H of the Building Regulations. Issues of groundwater ingress to basement levels should be addressed by property owners. In areas at risk of flooding, policy LP 21 in 6.2 'Flood Risk and Sustainable Drainage' will be applied, which restricts certain types of basements and uses in accordance with the relevant flood zones.

**4.11.9** Basements and subterranean developments can suffer inundation from flood water entering the basement from above. The Flood Risk and Sustainable Drainage Policy of this Plan sets out restrictions for basement developments in areas at risk of flooding. In addition, basements are vulnerable to groundwater entering through the walls and floors as well as service entries. Applicants should follow the BSI Code of Practice for protection of below ground structures against water from the ground (BS 8102:2009).

**4.11.10** The impact of basement and subterranean construction, including issues relating to noise, dust, disturbance and structural stability of surrounding properties as well as the management of traffic, plant and equipment, is a growing concern in the borough, particularly in residential streets. It can affect the quality of life, amenity and living conditions as well as traffic and parking of nearby residents and local communities. In some instances, multiple excavations in a residential street can lead to detrimental impacts during the excavation and construction processes. While Planning has limited powers to control the construction processes, it does have an important role in protecting amenity and living conditions. This policy seeks to ensure that the amenity, living conditions and the health and wellbeing of nearby residents are protected by reducing the impacts from construction works, such as noise, vibration, soil removal and associated plant,

machinery and heavy vehicles. Therefore, a Construction Management Statement (CMS), as set out in the Council's Local Validation Checklist, will be required for all types of basement and subterranean developments.

**4.11.11** There are concerns over the impacts of basements and subterranean developments on the structural stability of the host building as well as of adjacent and potentially other nearby properties. As the problem in this borough largely relates to residential streets, with terraced and semi-detached houses, careful control is required to manage the detrimental impacts of basement and subterranean developments and to prevent long-term harm to amenity and living conditions of the local community.

**4.11.12** Due to the potential irreversible detrimental harm to the historic integrity and risks to structural damage, particular care and attention needs to be taken where a subterranean or basement development could affect a designated heritage asset, such as a Listed Building or the associated garden land of a Listed Building. Therefore, where a subterranean development or basement is added to, or adjacent to, a Listed Building, a Structural Impact Assessment, including written confirmation that the applicant will pay for the structural report to be independently assessed, will be required.

**4.11.13** The Council's Good Practice Guide on Basement Developments sets out guidance to ensure that problems relating to excavation and constructions of basements, such as highway/parking impacts, noise, dust, vibration and disturbance to neighbours, are avoided. It is expected that all developers for basement and subterranean works follow this guidance. In addition, developers of basements and subterranean developments are also expected to sign up to a Considerate Construction Scheme.

**4.11.14** Applicants wishing to undertake basement and subterranean developments are strongly advised to discuss their proposal with neighbours and other parties, who may be affected, by commencing Party Wall negotiations and discussing the scheme with the Council prior to the submission of a planning application.

# Green Infrastructure 5

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## 5 Green Infrastructure

### 5.1 Green Infrastructure

#### Why we are reviewing this policy area

The planning system should contribute to and enhance the natural and local environment. Local Plans should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure as required by national policy and guidance.

The Council should therefore consider creating a new policy on green infrastructure, highlighting the multi-functional network of open spaces, their value for biodiversity and identifying the green corridors that are of strategic importance. The strategic Biodiversity policy could then link to and cross-refer to the new green infrastructure policy.

#### What the evidence says

Green Infrastructure can help deliver wider planning policy aims such as: sustainable development, delivery of high quality homes, promoting wellbeing and healthy communities, the mitigation of climate change risks, enhancing landscape character and contributing to high quality place making.

There continues to be a need to identify, protect and enhance biodiversity including the sites of importance for nature conservation in the borough. New biodiversity features should be incorporated into new developments to provide net gains in biodiversity where possible. The Richmond Biodiversity Action Plan (2005) identifies key species and habitats the progress of which can be monitored through the Authority's Monitoring Report.

#### Existing Policy - CP4 Biodiversity

4.A The Borough's biodiversity including the SSSIs and Other Sites of Nature Importance will be safeguarded and enhanced. Biodiversity enhancements will be encouraged particularly in areas of deficiency (parts of Whitton, Hampton, Teddington, Twickenham and South Kew), in areas of new development and along wildlife corridors and green chains such as the River Thames and River Crane corridors.

4.B Weighted priority in terms of their importance will be afforded to protected species and priority species and habitats in the UK, Regional and Richmond upon Thames Biodiversity Action Plans.

#### Existing Policy - CP10 Open Land and Parks

The open environment will be protected and enhanced. In particular:

10.A The Borough's green belt, metropolitan open land and other open land of townscape importance, World Heritage Site (Royal Botanic Gardens, Kew), land on the Register of Parks and Gardens of Special Historic Interest, green chains and green corridors will be safeguarded and improved for biodiversity, sport and recreation and heritage, and for visual reasons.

10.B A number of additional areas of open land of townscape importance will be identified, which will be brought forward through the Development Allocations DPD.

10.C The hierarchy of open spaces below, will be retained and managed in accordance with the principles shown.

Public Open Space Hierarchy:

Type and main Function	Function and strategic proposals
<b>Regional Parks</b> <b>400 ha+</b>	<ul style="list-style-type: none"> <li>Large areas of natural land</li> <li>Primarily informal recreation, some active recreation</li> <li>Car parking at key locations</li> </ul>
<b>Metropolitan parks</b> <b>60 – 400 ha</b>	<ul style="list-style-type: none"> <li>To include provision of playing fields, golf courses and other uses which require extensive land.</li> <li>To include areas managed for nature conservation purposes</li> <li>To include extensive land for informal activities such as walking, picnics and barbeques.</li> <li>To include some car parking and refreshment facilities.</li> <li>To include children's play facilities.</li> </ul>
<b>District parks</b> <b>20 – 60 ha</b>	<ul style="list-style-type: none"> <li>To include all of the above but majority of space to be more formally managed as playing fields.</li> </ul> <p>Proposals Treat as key parks: Sheen Common, Palewell Common, Old Deer Park, KnellerGardens/CranePark</p>
<b>Local parks</b> <b>2 – 20 ha</b>	<ul style="list-style-type: none"> <li>To provide children's play, court games and nature conservation.</li> <li>Limited playing field provision.</li> </ul> <p>Proposals Treat as key parks:</p>

	Barn Elms, Carlisle Park, Hatherop Park, King Georges Field, North Sheen Rec, Kingsfield, Murray Park
<b>Small local parks and open spaces</b> <b>Less than 2 ha</b>	<ul style="list-style-type: none"> <li>To provide gardens, sitting out areas, playgrounds and nature conservation.</li> </ul> <p>Proposals Treat as key parks: Vine Road Rec., Mortlake Green</p>
<b>Pocket Parks</b> <b>Under 0.4 ha</b>	<ul style="list-style-type: none"> <li>Small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation, may or may not have seating and play equipment</li> </ul>
<b>Linear open spaces</b>	<ul style="list-style-type: none"> <li>To be managed to provide for informal recreation, including nature conservation.</li> </ul>

10.D New provision will be encouraged in areas of open space deficiency at Upper Richmond Road West, between Park Road/ Uxbridge Road Hampton Hill, Fulwell, South Twickenham, parts of St Margaret's and parts of Whitton. All developments will be expected to incorporate appropriate elements of open space that make a positive contribution to the wider network.

### New Policy LP 12

#### Green Infrastructure

Green infrastructure is a network of multi-functional green spaces and natural elements, which provides multiple benefits for people, nature and the economy.



A. To ensure all development proposals protect, and where opportunities arise enhance, green infrastructure, the following will be taken into account when assessing development proposals:

- a. the need to protect the integrity of the green spaces and assets that are part of the wider green infrastructure network; improvements and enhancements to the green infrastructure network are supported;
- b. its contribution to the wider green infrastructure network by delivering landscape enhancement, restoration or re-creation;
- c. incorporating green infrastructure assets, which make a positive contribution to the wider green infrastructure network.

B. The hierarchy of open spaces, as set out in the table below, will be protected and used in accordance with the functions shown.

#### Public Open Space Hierarchy:

Type and size	Main function
<b>Regional Parks</b> (400 ha+)	Large areas, corridors or networks of open space, the majority of which will be publicly accessible and provide a range of facilities and features offering recreational, ecological, landscape, cultural or green infrastructure benefits. Offer a combination of facilities and features that are unique within London, are readily accessible by public transport and are managed to meet best practice quality standards.
<b>Metropolitan parks</b> (60 – 400 ha)	Large areas of open space that provide a similar range of benefits to Regional Parks and offer a combination of facilities at a sub-regional level, are readily accessible by public transport and are managed to meet best practice quality standards.

<b>District parks</b> (20 – 60 ha)	Large areas of open space that provide a landscape setting with a variety of natural features providing a wide range of activities, including outdoor sports facilities and playing fields, children's play for different age groups and informal recreation pursuits.
<b>Local parks</b> (2 – 20 ha)	Providing for court games, children's play, sitting out areas and nature conservation areas.
<b>Small local parks and open spaces</b> (less than 2 ha)	Gardens, sitting out areas, children's play spaces or other areas of a specialist nature, including nature conservation areas.
<b>Pocket Parks</b> (under 0.4 ha)	Small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and play equipment.
<b>Linear open spaces</b> (variable)	Open spaces and towpaths alongside the Thames and other waterways; paths, disused railways; nature conservation areas; and other routes that provide opportunities for informal recreation. Often characterised by features or attractive areas which are not fully accessible to the public but contribute to the enjoyment of the space.

**5.1.1** The borough is characterised by extensive areas of open land, designated as Green Belt, Metropolitan Open Land, as well as the borough's rivers and their corridors, which link across borough boundaries

and have a strategic function in southwest London, Greater London and beyond. In addition, there are many smaller pieces of open land, including land designated as Other Open Land of Townscape Importance, as well as non-designated land, all of which are of value to the local area and provide green oases for local communities. The Council places a high priority on the protection and enhancement of its environment and the wider green infrastructure network to ensure the borough remains an attractive area for people to live, work and visit to enjoy their heritage and leisure time.

**5.1.2** The assets that contribute to and make up the overall green infrastructure network range from borough-wide and strategic features such as parks, watercourses, woodlands to local features such as playgrounds, sports pitches, allotments, public open spaces, trees, private gardens and other green spaces used for recreational purposes. There are also other assets such as highway verges, railway embankments as well as site-specific elements such as green roofs and green walls that are considered to be part of the wider green infrastructure network.

**5.1.3** Housing delivery, and infrastructure required to support it, is expected to be met without compromising the green infrastructure network and there is a presumption against the loss of, or building on, greenfield sites.

**5.1.4** The provision of multi-functional green infrastructure, including urban greening, green corridors and green roofs have biodiversity as well as social, health, recreational, flood storage and cooling benefits, which can reduce urban heat islands, manage flooding and help species adapt to the likely effects of climate change as well as contributing to a pleasant environment. Green infrastructure can support healthier lifestyles by providing green routes for walking and cycling, and green spaces for recreation, exercise and play.

**5.1.5** The presence of a network of green spaces may reduce the likelihood of flooding by allowing water to permeate through the ground. Green infrastructure can also be designed to act as flood storage areas, holding large volumes of water in temporary ponds to protect built up areas from flooding.

**5.1.6** The Mayor of London's All London Green Grid SPG seeks to ensure that in and through Local Plan policies, green infrastructure needs are planned and managed to realise the current and potential value of open space to communities and to support delivery of the widest range of linked environmental and social benefits. The two All London Green Grid areas within this borough are the Arcadian Thames, and the River Colne and Crane Area. Each area has its own Framework and list of associated projects. The Council will work with partners to help realise the vision for the Green Grid and the objectives of the relevant area frameworks.

**5.1.7** The creation and enhancement of green infrastructure helps to:

- create attractive and accessible places for people to enjoy direct and regular contact with the natural environment;
- strengthen links between urban areas and their surrounding open spaces, and bring the natural world into a neighbourhood, with benefits for both individual and community health and well-being.

**5.1.8** Many of the components of green infrastructure, such as parks and play spaces, also relate directly to place-making and enhancing local character. At a wider scale, green infrastructure can contribute to local identity and landscape character.

**5.1.9** The public open space hierarchy as set out in the policy follows the categorisation of the London Plan and provides for a range of open spaces for formal and informal recreation. Many of the borough's parks and open spaces are of 'regional' or 'metropolitan' importance in providing opportunities for recreation, and many have historic significance, biodiversity value or can be regarded as areas of relative tranquillity. The open space network, including the Blue Ribbon network such as the River Thames and River Crane corridors, as well as the links in between provide

the natural green infrastructure that performs a wide range of functions for residents, visitors, biodiversity and the economy. It is important to recognise that the borough's parks and open spaces provide not only recreational opportunities for those that live and work in this borough, but also for local communities and residents in neighbouring and other London boroughs, thus providing the green lung for southwest London.

**5.1.10** A network that includes parks, playing fields, open spaces, woodlands, trees, allotments and private gardens contributes to ecological connectivity to overcome habitat fragmentation and increases the ability of the natural environment to adapt to climate change.

**5.1.11** There may be opportunities to incorporate or retrofit elements of green infrastructure on all development sites. Where appropriate, these can be realised through for example :

- green roof systems and roof gardens,
- green walls to provide insulation or shading and cooling,
- swales integrated as part of streetscape and traffic calming schemes or neighbourhood play areas, and
- new tree planting or altering the management of land associated with transport corridors.

## 5.2 Green Belt and Metropolitan Open Land

### Why we are reviewing this policy area

The policy is in line with national guidance on the Green Belt as it allows for flexibility or exceptions where required. There is however a need to specifically refer to the Green Belt to ensure there is clarity that both the Green Belt and Metropolitan Open Land (MOL) are given the same level of protection, and that the same policies apply.

Additional guidance in relation to major schemes that deliver wider public benefits could be added. For example where a comprehensive approach to redevelopment can be taken, it may be acceptable to consider re-distribution of open land subject to specific criteria.

### What the evidence says

National guidance set out in paragraphs 79-92 of the NPPF on Green Belts applies equally to Metropolitan Open Land (MOL) in line with regional guidance set out in the London Plan. The same level of protection should be given to London's MOL and inappropriate development refused, except in very special circumstances.

The borough has a significant amount of designated MOL, accounting for around 60% (3054 ha) of the borough's area including Richmond Park, Bushy Park, Hampton Court Palace, Old Deer Park and the Royal Botanic Gardens, Kew. The Council has an up-to-date evidence base in relation to parks and open spaces, as set out in the Council's Open Space Assessment Report (2015).

The land comprising Twickenham and Fulwell golf courses is held under The Green Belt (London and Home Counties) Act, 1938. An Act to make provision for the preservation from industrial or built development of areas of land in and around the administrative county of London. Under this Act owners are required to request permission from the Secretary of State to build on or dispose of this land. This requirement is separate from and in addition to any requirements for planning permission. Most of this land is protected in the Local Plan by its designation as Metropolitan Open Land. It is not covered in this Local Plan by a Green Belt designation in the terms described by national guidance and the Council does not propose to designate this land as Green Belt in the Local Plan. The decision as to whether to designate this land as Green Belt in addition to Metropolitan Open Land rests with the Council. This was confirmed by the examiner's

report into the Examination of the Development Management Plan in 2011. The Council does not consider that there has been any material change of circumstance since that report that would support a change of approach.

Notwithstanding the Council's decision not to designate land at Twickenham and Fulwell golf courses as Green Belt, it is emphasised that this land is designated as Metropolitan Open Land, and therefore the same policy framework applies. A Green Belt designation would therefore not add any additional protection to this land.

#### **Existing Policy - DM OS 2 Metropolitan Open Land**

The borough's Metropolitan Open Land will be protected and retained in predominately open use. Appropriate uses include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water and open community uses including allotments and cemeteries.

It will be recognised that there may be exceptional cases where appropriate development such as small scale structures is acceptable, but only if it:

1. Does not harm the character and openness of the metropolitan open land; and
2. Is linked to the functional use of the Metropolitan Open Land or supports outdoor open space uses; or
3. Is for essential utility infrastructure and facilities, for which it needs to be demonstrated that no alternative locations are available and that they do not have any adverse impacts on the character and openness of the metropolitan open land.

Improvement and enhancement of the openness and character of the Metropolitan Open Land and measures to reduce visual impacts will be encouraged where appropriate.

When considering developments on sites outside Metropolitan Open Land, any possible visual impacts on the character and openness of the Metropolitan Open Land will be taken into account.

#### **Existing Statement - Green Belt**

For areas of Green Belt designated on the Proposals Map, PPG2 or any subsequent national planning policy guidance will apply. In addition, London Plan policy 7.16 and Core Strategy CP10 Open Land and Parks are also relevant.

The land at Twickenham and Fulwell golf courses is held under "The Green Belt (London and Home Counties) Act, 1938. An Act to make provision for the preservation from industrial or building development of areas of land in and around the administrative county of London." Under this Act owners are required to request permission from the Secretary of State to build on or dispose of this land. This requirement is separate from and in addition to any requirements for planning permission. Most of this land is protected in the Local Development Framework by its designation as Metropolitan Open Land under Policy DM OS 2, it is not covered in this LDF by any planning policy green belt designation in the terms described by PPG2.

## New Policy LP 13

### Green Belt and Metropolitan Open Land

A. The borough's Green Belt and Metropolitan Open Land will be protected and retained in predominately open use. Inappropriate development will be refused unless 'very special circumstances' can be demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land.

Appropriate uses within Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water and open community uses including allotments and cemeteries. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt or Metropolitan Open Land.

B. It will be recognised that there may be exceptional cases where inappropriate development such as small scale structures may be acceptable, but only if it:

1. Does not harm the character and openness of the Green Belt or Metropolitan Open Land; and
2. Is linked to the functional use of the Green Belt or Metropolitan Open Land, or supports outdoor open space uses; or
3. Is for essential utility infrastructure and facilities for which it needs to be demonstrated that no alternative locations are available and that they do not have any adverse impacts on the character and openness of the Green Belt or Metropolitan Open Land.

Improvement and enhancement of the openness and character of the Green Belt or Metropolitan Open Land and measures to reduce visual impacts will be encouraged where appropriate.

When considering developments on sites outside Green Belt or Metropolitan Open Land, any possible visual impacts on the character and openness of the Green Belt or Metropolitan Open Land will be taken into account.

**5.2.1** The fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence. For the avoidance of doubt, the Green Belt includes land identified in the Green Belt (London and Home Counties) Act 1938. Metropolitan Open Land (MOL) is unique to London and protects strategically important open spaces within the built environment. This policy applies equally to Green Belt or Metropolitan Open Land. In addition, paragraphs 79-92 of the NPPF on Green Belts applies equally to MOL.

**5.2.2** MOL is open land or water, either publicly or privately owned, with or without public access. MOL, as shown on the Proposals Map, plays an important strategic role as part of the borough's and London-wide multi-functional green infrastructure network and improvements in its overall quality and accessibility are encouraged. Green chains, including footpaths and open spaces that they link, are important to London's green infrastructure network, providing opportunities for recreation and biodiversity, and are therefore designated as MOL due to their London-wide strategic importance.

**5.2.3** National and regional policies, including this policy, apply to the borough's areas designated as Green Belt, as shown on the Proposals Map. National guidance sets out the functions of the Green Belt, its key characteristics and acceptable uses.

**5.2.4** The purpose of this policy is to safeguard this open land and protect and retain it in predominately open use. There is a presumption against inappropriate development in the Green Belt or MOL, and inappropriate development by definition, is harmful to the Green Belt or MOL and should not be approved except in very special circumstances. However, the policy



also recognises that there may be exceptional cases where inappropriate development could be acceptable, provided that the criteria set out in the policy are met. Water, waste water treatment and sewage treatment plants, including any associated facilities, are considered to be essential utility infrastructure and facilities. New uses will only be considered if they are by their nature open or depend upon open uses for their enjoyment and if they conserve and enhance the open nature, character and biodiversity interest of MOL.

**5.2.5** Where a development proposal affects designated Green Belt or MOL, the applicant is required to submit an assessment that compares the footprint and floorspace of existing structures and buildings with the footprint and floorspace of the proposed development. This will enable the Council to make an informed judgement in relation to the overall impact on, and potential loss of, designated Green Belt or MOL. Any increase in either footprint or floorspace within designated Green Belt or MOL will need to be fully justified by the applicant.

**5.2.6** Development that involves the loss of Green Belt or MOL in return for the creation of new open space elsewhere will not be supported. However, where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals that deliver significant wider public benefits, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent to or improved in terms of quantum, quality and openness. The applicant will need to demonstrate this as part of the any justification that 'very special circumstances' may exist.

**5.2.7** Enhancement to the Green Belt or MOL for example by landscaping, removal or replacement of inappropriate fencing and screening, and reduction of the visual impact of traffic or car parking as well as opening up views into and out of the Green Belt or MOL will be encouraged. Where possible, opportunities to increase the Green Belt's or MOL's potential for wildlife should be maximised.

### 5.3 Other Open Land of Townscape Importance

#### Why we are reviewing this policy area

Other open land can be of value to communities. The designation is a way to provide special protection against development for green areas of particular importance to local communities. Some minor updates are required to the policy text.

#### What the evidence says

There are just over 160 sites designated as Other Open Land of Townscape Importance (OOLTI) in the borough. A detailed assessment of the borough's open space provision including its condition, distribution and overall quality, covering parks and gardens, natural and semi-natural greenspaces, amenity greenspaces, play provision, allotments, cemeteries and civic spaces was carried out as part of the Council's Open Space Assessment, available on the [Council's website](http://www.richmond.gov.uk/local_development_framework_research.htm) at [www.richmond.gov.uk/local\\_development\\_framework\\_research.htm](http://www.richmond.gov.uk/local_development_framework_research.htm)

#### Existing Policy DM OS 3 - Other Open Land of Townscape Importance

Other open areas that are of townscape importance will be protected and enhanced in open use.

It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria must be taken into account when assessing appropriate development:

1. It must be linked to the functional use of the Other Open Land of Townscape Importance; or
2. It can only be a replacement or minor extension of existing built facilities;
3. In addition to 1. or 2., it does not harm the character and openness of the open land.

Improvement and enhancement of the openness and character of other open land and measures to open up views into and out of designated other open land will be encouraged where appropriate.

When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account.

## New Policy LP 14

### Other Open Land of Townscape Importance

Other open areas that are of townscape importance will be protected in open use, and enhanced where possible.

It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria will be taken into account when assessing whether development is appropriate:

- a. it must be linked to the functional use of the Other Open Land of Townscape Importance; or
- b. it can only be a replacement of, or minor extension to, existing built facilities; and
- c. it does not harm the character or openness of the open land.

Improvement and enhancement of the openness or character of other open land and measures to open up views into and out of designated other open land will be encouraged.

When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account.

**5.3.1** The purpose of this policy is to safeguard open land of local importance and ensure that it is not lost to other uses without good cause. Areas designated as Other Open Land of Townscape Importance (OOLTI) form an important part of the multi-functional network of Green Infrastructure and they can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. The designated areas are shown on the Proposals Map.

**5.3.2** In some parts of the borough, open areas, including larger blocks of back gardens, act as pockets of greenery of local rather than strategic significance. Many of these are of townscape importance, contributing to the local character and are valued by residents as open spaces in the built up area. Green oases are particularly important in areas of higher density development including in the borough's centres.

**5.3.3** This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value, and therefore merit protection.

**5.3.4** OOLTI should be predominantly open or natural in character. The following criteria are taken into account when defining OOLTI (note that the criteria are qualitative and not all need to be met):

- Contribution to the local character and/or street scene, by virtue of its size, position and quality.
- Value to local people for its presence and openness.

## 5 Green Infrastructure

### Pre-Publication Local Plan

- Immediate or longer views into and out of the site, including from surrounding properties.
- Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure'.
- Value for biodiversity and nature conservation.

**5.3.5** This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value in line with the criteria set out above, and therefore merit protection.

**5.3.6** Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for community and social infrastructure including educational uses, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness.

**5.3.7** Protecting and opening up views into and out of designated OOLTI is encouraged because of the contribution they can make to the distinctive character of an area and the benefits to all.

### 5.4 Biodiversity

#### Why we are reviewing this policy area

In line with national and regional guidance, the Council could consider creating a new policy on green infrastructure, highlighting the multi-functional network of open spaces, their value for biodiversity and reflecting the green corridors that are of strategic importance. The strategic Biodiversity policy could then link to and cross-refer to the new green infrastructure policy.

#### What the evidence says

All public authorities in England and Wales have a duty to have regard to the purpose of conserving biodiversity in the exercise of their functions.

There is a need to identify, protect and enhance biodiversity including the sites of importance for nature conservation in the borough, taking account of the relevant Biodiversity Action Plans for London and the borough as well as 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' (which replaced the UK Biodiversity Action Plan).

There is also a need to require new biodiversity features to be incorporated into new developments to provide net gains in biodiversity where possible.

#### Existing Policy CP 4 - Biodiversity

A. The Borough's biodiversity including the SSSIs and Other Sites of Nature Importance will be safeguarded and enhanced. Biodiversity enhancements will be encouraged particularly in areas of deficiency (parts of Whitton, Hampton, Teddington, Twickenham and South Kew), in areas of new development and along wildlife corridors and green chains such as the River Thames and River Crane corridors.

B. Weighted priority in terms of their importance will be afforded to protected species and priority species and habitats in the UK, Regional and Richmond upon Thames Biodiversity Action Plans.

**Existing Policy DM OS 5 - Biodiversity and new development**

All new development will be expected to preserve and where possible enhance existing habitats including river corridors and biodiversity features, including trees.

All developments will be required to enhance existing and incorporate new biodiversity features and habitats into the design of buildings themselves as well as in appropriate design and landscaping schemes of new developments with the aim to attract wildlife and promote biodiversity, where possible.

When designing new habitats and biodiversity features, consideration should be given to the use of native species as well as the adaptability to the likely effects of climate change.

New habitats and biodiversity features should make a positive contribution to and should be integrated and linked to the wider green and blue infrastructure network, including de-culverting rivers, where possible.

**New Policy LP 15****Biodiversity**

A. The Council will protect and enhance the borough's biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats. Weighted priority in terms of their importance will be afforded to protected species and priority species and habitats including National Nature Reserves, Sites of Special Scientific Interest

(SSSI) and Other Sites of Nature Importance as set out in the Biodiversity Strategy for England, and the London and Richmond upon Thames Biodiversity Action Plans. This will be achieved by:

1. protecting biodiversity in, and adjacent to, the borough's designated sites for biodiversity and nature conservation importance (including buffer zones), as well as other existing habitats and features of biodiversity value;
2. supporting enhancements to biodiversity;
3. incorporating and creating new habitats or biodiversity features, including trees, into development sites and into the design of buildings themselves where appropriate;
4. ensuring new biodiversity features or habitats connect to the wider ecological and green infrastructure networks and complement surrounding habitats;
5. enhancing wildlife corridors for the movement of species, including river corridors, where opportunities arise; and
6. maximising the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.

B. Where development would impact on species or a habitat, especially where identified in the relevant Biodiversity Action Plan at London or local level, or the Biodiversity Strategy for England, the potential harm should:

1. firstly be avoided (the applicant has to demonstrate that there is no alternative site with less harmful impacts),
2. secondly be adequately mitigated; or
3. as a last resort, appropriately compensated for.

**5.4.1** Biodiversity is promoted through the designation of sites and areas (statutory and non-statutory), including links and corridors, that are of nature conservation and biodiversity value. The aim of this policy is to protect and enhance the biodiversity in, and adjacent to, the borough's

designated sites as well as other non-designated existing habitats and features of biodiversity value. The borough's open land and rivers, including the Thames and its islands, the River Crane, Beverley Brook, Duke of Northumberland River, Longford River and Whitton Brook, including the river banks, are vital elements that support the borough's biodiversity. It is important that all these areas, and where possible green linkages between them, are protected.

**5.4.2** The Richmond Biodiversity Action Plan (BAP) sets out the Sites of Metropolitan, Borough and Local Importance for Nature Conservation (SINC) in the borough. The level of weight given to protected sites should be commensurate to their importance and the contribution that they make to wider ecological and green infrastructure networks. The highest protection should be given to sites with existing or proposed international designations, (i.e. Special Areas of Conservation, SACs; Special Protection Areas, SPAs; Ramsar Sites) and national designations (Sites of Special Scientific Interest, SSSIs; National Nature Reserves, NNRs). Strong protection should be given to sites of metropolitan and borough-wide importance, and commensurate protection should be given to sites of local importance.

**5.4.3** Where development proposals could affect or harm a European Protected Species or its habitat, the application will be assessed on the three tests of the Habitats Regulations, and should planning permission be approved, then the developer is required to independently obtain a licence from Natural England. Where ecological surveys and assessments are undertaken, developers should make all ecological data available to Greenspace Information for Greater London (GiGL) – the capital's environmental records centre.

**5.4.4** Biodiversity does not only enhance and enrich the borough's landscapes and wildlife, but it also makes a significant contribution to the distinctiveness of this unique borough, providing a sense of place, cultural heritage, tranquillity as well as opportunities for recreation and a healthier lifestyle. In addition, protecting and enhancing biodiversity, including the provision of new habitats and features, increases the resilience of our ecosystems and helps the physical environment to change and adapt to

different stresses. Biodiversity, including the wider ecological and green infrastructure networks, play a crucial role in adapting to the effects of climate change.

**5.4.5** This policy recognises that biodiversity interest is not just confined to designated nature conservation areas. Outside designated areas, including on previously developed land or brownfield land, there is an abundance of biodiversity features and habitats, including trees, hedges, wildlife gardens, allotments, ponds, green roofs, living walls, nesting and roosting boxes and bat boxes.

**5.4.6** The promotion of nature conservation should be treated as integral to any new development scheme, not as an 'add-on'. Layout, design, buildings and landscaping schemes should take account of existing biodiversity features and habitats. New development should include new or enhanced features and habitats, design (such as green roofs) and landscaping (including trees) that promote biodiversity, including provision for their management. These features must also be protected during construction works, and this may be subject to a planning condition as will subsequent maintenance and monitoring.

**5.4.7** Therefore, the Council expects developments to incorporate new biodiversity features and habitats into the design of buildings themselves as well as in appropriate design and landscaping schemes of new and/or redevelopments (including surrounding areas where appropriate) with the aim to attract wildlife and promote biodiversity where possible. This is particularly important in areas with less access to areas of nature conservation importance. Therefore, proposals should seek to include:

- habitat restoration, re-creation and expansion;
- improved links between existing sites;
- buffering of existing important sites;
- new biodiversity features within development; and
- securing management for long term enhancement.



**5.4.8** The Richmond BAP and other relevant local strategies set out measures to protect and enhance the borough's biodiversity resource by improving the quality of the local environment through practical management, habitat creation and protection of important wildlife sites. The implementation of the Richmond BAP is an important vehicle to improving the biodiversity of the borough.

**5.4.9** Any schemes for incorporating new biodiversity features or creating new habitats should take account of site constraints (such as utility infrastructure) and consider the use of native species. The species suitability and their adaptability to the likely effects of climate change need to be taken into account. Guidance on the use of native species and climate change can be found in the relevant BAPs, the Mayor of London's Biodiversity Strategy and the London Tree and Woodland Framework.

## 5.5 Trees and Landscape

### Why we are reviewing this policy area

Trees are a valuable asset within our landscape, enhancing the borough's character and appearance, supporting a rich biodiversity and providing multiple ecosystem services and contributing to improving air quality. The policy should be updated to ensure the multiple benefits of trees are realised and referred to in other policy areas. In addition, there is a need to consider specific requirements for relevant development proposals in areas of deficiencies in the number of trees, including using Planning Obligations to provide for trees off-site where appropriate.

There is also a need to retain large canopy trees wherever possible and ensure development is designed and constructed in a way that is not detrimental to the health and longevity of retained specimens. Although, a balance is needed when considering residential properties and the reasonable enjoyment of outdoor space.

### What the evidence says

There is a need to develop a borough-wide tree strategy and to develop appropriate policies to facilitate its implementation. The Council has adopted a Tree Management Policy, which recognises the benefits of trees and outlines a responsible management approach towards trees in the borough.

In line with the Mayor of London's Tree and Woodland Framework, it is essential that the existing tree stock is managed and maintained effectively and that new trees are planted having regard to the contribution they can make to enhancing amenity and the urban landscape.

### Existing Policy DM DC 4 - Trees and Landscape

The boroughs trees and landscape will be protected and enhanced by:

- The use of Tree Preservation Orders (TPOs) where appropriate;
- Planting and encouraging others to plant trees, clumps and thickets particularly in areas of deficiency as shown on the Proposals Map and of a type and species as set out in the Borough's Tree Strategy.
- continuing to maintain trees in streets and public open spaces and of selectively clearing and replanting trees;
- requiring landscape proposals in submissions for new development, which retain existing trees and other important landscape features where practicable and include new trees and other planting. Where trees are removed, appropriate replacement planting will normally be required. There will be a presumption against schemes that result in a significant loss of trees, unless replacements are proposed and there is good

reason such as the health of the trees, public amenity, street scene or restoration of an historic garden. Landscaping schemes should take account of the Borough's Tree Strategy.

#### New Policy LP 16

##### Trees and Landscape

A. The Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that compliment existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits.

To ensure development protects, respects, contributes to and enhances trees and landscapes, the Council, when assessing development proposals, will:

##### Trees

1. resist the loss of trees unless the tree is dead, dying or dangerous; or the tree is causing significant damage to adjacent structures; or the tree has little or no amenity value; or felling is for reasons of good arboricultural practice;
2. resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value; the Council will require that site design or layout ensures a harmonious relationship between trees and their surroundings and will resist development which will be likely to result in pressure to significantly prune or remove trees;
3. require, where practicable, an appropriate replacement for any tree that is felled; a financial contribution to the provision for an off-site tree in line with the monetary value of the existing tree to be felled will be required in line with the 'Capital Asset Value for Amenity Trees' (CAVAT);

4. require new trees to be of a suitable species for the location in terms of height and root spread; the use of native species is encouraged where appropriate;
5. require that trees are adequately protected throughout the course of development, in accordance with British Standard 5837 (Trees in relation to design, demolition and construction – Recommendations).

The Council may serve Tree Preservation Orders or attach planning conditions to protect trees considered to be of value to the townscape and amenity and which are threatened by development.

##### Landscape

1. require the retention of important existing landscape features where practicable;
2. require landscape design and materials to be of high quality and compatible with the surrounding landscape and character; and
3. encourage planting, including new trees, shrubs and other significant vegetation where appropriate.

**5.5.1** The abundance of trees is a great asset to the borough's unique environment. Trees as well as other significant vegetation and landscape are key components of the borough's ecological and Green Infrastructure network. They soften the hardness of buildings and streets, add life, colour and character to the urban landscape and enhance open spaces and the riverside landscape. Trees and other planting, including contiguous gardens and green oases, deliver multiple benefits; they provide an important habitat for wildlife, reduce levels of airborne pollution such as carbon dioxide, nitrogen dioxide and harmful particulates (such as PM10's and PM2.5's); dampen noise from traffic and congestion; increase the supply of oxygen, provide shade for streets, open areas and parks as well as for buildings. Trees and other landscape features can help areas to adapt to the likely effects of climate change; for example, they have a cooling effect and contribute to the reduction of urban heat islands by regulating local

temperature extremes, which is important due to projected future increases in temperature as a result of climate change. In addition, they can assist in reducing surface water run off rates and flash floods during heavy rainfall events through absorption and infiltration.

**5.5.2** Many trees in the borough are already protected by Tree Preservation Orders (TPOs) or as a result of their location in Conservation Areas. The Council will consider making further TPOs where trees have been assessed to be of value to the townscape and amenity and which are threatened by development.

**5.5.3** Development proposals are required to retain and protect existing trees, and minimise any impacts on trees, shrubs and other significant vegetation, including through the provision of sufficient space for the crowns and root systems of existing and proposed trees and their future growth. Developer contributions towards trees within the public realm may be required where appropriate (see the Council's Planning Obligations SPD).

**5.5.4** It is important that species are chosen that are appropriate to the scale of their surroundings and public amenity, and guidance should be sought from relevant experts. The Council encourages the use of native species where appropriate. However, it is acknowledged that native species may not always be the most suitable choice, such as in certain historic landscapes, where there is an existing positive character of distinctive non-native trees. There may also be other particular situations where the use of non-native species may be beneficial. In addition, the Council encourages schemes that include large trees, where appropriate, as evidence suggests that the larger the tree, the greater the benefits to both amenity and ecosystems.

**5.5.5** An appropriate replacement for any tree that is felled will be required on-site where practicable. Where this is not possible, the Council will require a financial contribution to provide an off-site street tree. The Council will use the methodology set out in 'Capital Asset Value for Amenity Trees' (CAVAT) for calculating the monetary value and/or compensation where a tree is felled or damaged.

**5.5.6** The term 'landscape' is taken to refer to the design of all space between buildings and includes walls and boundaries, paving as well as planting. It refers to both 'soft' as well as 'hard' landscape and materials. These considerations are often vital in creating an appropriate setting to new developments and in integrating new development to its surroundings. Landscape design must form an integral part of any proposal and needs to be considered in relation to the development as a whole at the start of a project. Landscape design and where appropriate tree planting as well as other green infrastructure elements such as green roofs and green walls, will also need to contribute to and complement the existing character of an area as set out in the relevant Village Planning Guidance SPD.

## 5.6 Green Roofs and Walls

### Why we are reviewing this policy area

This policy is in line with national and regional policy. It should be retained and could be strengthened to encourage greater uptake of green/living roofs (and walls) where appropriate.

### What the evidence says

Green roofs and walls help adapt to a changing climate by absorbing rainfall and alleviating surface water flooding events, as well as helping to reduce air temperatures through evaporation and evapotranspiration processes therefore counteracting the urban heat island effect. It is proposed that this policy could be enhanced to be more encouraging and refer also to green walls as well as green roofs.

#### Existing Policy DM SD 5 - Living Roofs

Living roofs should be incorporated into new developments where technically feasible and subject to considerations of visual impact. The onus is on the applicant/developer for proposals with roof plate areas of 100sqm or more to provide evidence and justification if a living roof cannot be incorporated. The aim should be to use at least 70% of any potential roof plate area as a living roof.

The use of living roofs in smaller developments, renovations, conversions and extensions is encouraged and supported.

#### New Policy LP 17

##### Green Roofs and Walls

Green roofs should be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact. The aim should be to use at least 70% of any potential roof plate area as a green roof.

The onus is on an applicant to provide evidence and justification if a green roof cannot be incorporated. The Council will normally expect a green wall to be incorporated where it has been demonstrated that a green roof is not feasible.

The use of green roofs and walls is encouraged and supported in smaller developments, renovations, conversions and extensions.

**5.6.1** Green roofs are an essential sustainable design consideration and can take many forms in order to maximise their benefits in a given location. Vegetated roofs have many benefits, including the following:

- provision of Sustainable Drainage Systems (SuDS) to avoid rapid rain run-off into drains and rivers and improve water quality;
- adaptation to climate change and reduction in urban heat island effects (i.e. aiding cooling);
- mitigation of climate change and carbon savings (i.e. aiding energy efficiency);
- enhancement of biodiversity and provision of important refuges for wildlife in urban areas;
- provision of green space and potentially accessible roof space;
- improvements to visual appearance;
- enhanced roof and sound insulation properties and resilience of the building;
- enhanced roof lifespan by protecting underlying waterproofing systems;
- reduction in air and noise pollution; and
- growing food.

**5.6.2** Brown roofs are similar to green roofs in that they share many of the same benefits, but the overriding aim is to encourage biodiversity and to reinstate habitats conducive to local species on the roof. They can maximise the number of species living on the rooftop or provide a habitat for threatened species living on a brownfield site that a building is being constructed on.

**5.6.3** Green roofs, as well as brown roofs, are of importance in this borough because of the following:

- The borough is very susceptible to surface water flooding and such roofs can make an important contribution to reducing surface run-off volumes and rates, and reduce flash flooding.
- There may be higher temperatures in the borough in the future due to climate change. The evaporation and evapotranspiration from such roofs cools the air. The combined effect of a cooler surface at roof level coupled with better thermal insulation that reduces the need for air conditioning during periods of higher than normal temperatures reduces and counteracts the urban heat island effect.

- New living roofs, particularly brown roofs, could provide new wildlife habitats in areas which are currently deficient. They could create new links to the borough's and London's network of habitats and green infrastructure and could provide additional habitats for protected, rare or important species, which can in turn help to meet the targets in the UK, Regional and Richmond upon Thames Biodiversity Action Plans.
- Green roofs could contribute to the overall amount of greenness in the borough. In particular, such roof space could also be made accessible, which can be of benefit for residents who do not have access to private gardens. Proposals for accessible green roof space must conform to other policies in this Plan, to ensure they are adequately designed and safe and do not adversely affect amenity and living conditions.

**5.6.4** A green roof is defined as having a minimum of 70% soil/vegetation coverage, with a minimum substrate depth of 85mm, and a maximum of 30% hard surface. Green roofs are not roof terraces. Green roofs can be installed on any pitch of roof; however, as the pitch increases, additional specific design measures will be required in order to retain the substrate across the roof surface, which will result in increased costs. The appearance of the green roof also needs to be compatible with the surrounding area. The aim should be to use at least 70% of any potential roof plate area as a green roof; that is, the total roof plate area including space for renewable energy solutions such as photovoltaic panels and solar thermal but excluding non-green roof solutions such as air conditioning units. The Council will take into account relevant viability information.

**5.6.5** Green roofs do not preclude the use of renewable energy technologies. Green roofs and photovoltaic panels or solar thermal units can be used together and green roofs increase the efficiency of solar photovoltaic panels by regulating temperature. An applicant will have to provide evidence and justification if a green roof cannot be incorporated for major development proposals with roof plate areas of 100sqm or more.

**5.6.6** A green wall, which is vegetation over a building's vertical surfaces, may be an alternative if green roofs cannot be incorporated, provided they are properly designed and maintained. Green walls, also often referred to as vertical gardens, can have a number of design, ecological and performance benefits, including:

- enhancing a building's appearance, adding a new aesthetic dimension and visual benefits, screening or disguising a visually intrusive structure or building, softening of harsh urban environments, including deterring graffiti where this may be a problem;
- regulating local temperatures, reducing the urban heat island effect and keeping the building cool, thus contributing to a reduction in carbon dioxide emissions;
- prolonging the life of a building's façade by acting as a shield or barrier from the elements and light;
- providing a wildlife habitat in an urban area;
- reducing noise by adding an additional layer of insulation and absorbing sounds such as from traffic;
- contributing to improving air quality both by absorbing carbon dioxide and releasing oxygen as well as trapping dust and other pollutants.

**5.6.7** The design and operational needs of a green roof or wall should not place undue stress on water supply and other natural resources. Extensive green roofs, which are suitable for flat and pitched roofs and also for retrofitting, with low maintenance and no requirement for irrigation once established, are particularly encouraged. All green and brown roof systems should use a high percentage of recycled products.

**5.6.8** The provision of green roofs does not negate the need to make adequate open space provision on the ground. Any proposals for accessible green roofs need to be designed for security and safety and not adversely affect neighbouring properties.

**5.6.9** The use of green roofs and green walls in smaller developments, renovations, conversions, extensions and retrofitting is encouraged and supported, where opportunities arise.



**5.6.10** Conditions will be used where appropriate to secure the proper installation, maintenance and responsibility for green roofs and walls.

#### 5.7 River Corridors

##### Why we are reviewing this policy area

The River Thames and River Crane policies are considered to be overall in line with national and regional guidance. The Local Plan Review provides the opportunity to consolidate and streamline policies that relate to the borough's rivers, including the need to protect and enhance the river's biodiversity as well as the requirements for public access to the River Thames. There is also an opportunity to clearly set out the Environment Agency requirements for the provision of buffer zones alongside rivers.

In relation to the River Crane, the Council adopted the Crane Valley Planning Guidelines SPG in 2005, which specifically relates to the following four development sites in Twickenham:

- Former Post Office Sorting Office
- Richmond College, including the playing fields
- Harlequins Rugby Ground (the Stoop)
- Central Depot, Craneford Way

The main purpose of the SPG is to provide guidance for developers on these sites. The SPG was produced in support of the Unitary Development Plan (2005), which is now largely superseded by other Local Plan documents. The UDP established the 'River Crane Area of Opportunity', and this was taken forward into the Core Strategy, which was adopted in 2009.

Due to the status and progress on the development sites to which the Crane Valley SPG relates, the Council feels that the SPG has now largely fulfilled its role. In addition, in light of the terminology used in the London Plan relating to 'opportunity areas', and given the All

London Green Grid SPG and Framework for the River Colne and Crane Area, it is not proposed to take the River Crane Area of Opportunity designation forward as part of the Local Plan.

However, it should be noted that the policy on River Corridors and other policies in this Plan as well as the proposed Site Allocations for Richmond College and the Harequins Rugby Ground, will continue to expect contributions to improvements and enhancements of the river environment when development is proposed adjacent to the River Crane corridor.

##### What the evidence says

There is a need to protect and enhance the natural and built environment and unique historic landscape of the River Thames corridor (as designated in the Proposals Map as Thames Policy Area) as well as the River Crane and Beverly Brook corridors, including their biodiversity and access to them.

The Thames Landscape Strategy and the Thames Strategy – Kew to Chelsea and the Thames Estuary 2100 (TE2100) Plan should be reflected in the policy.

In relation to the River Thames, there is a need to ensure that the requirement for a public footpath alongside the River Thames, including access to it, is clearly set out in the policy.

##### Thames Policy Area

There is a need to identify the Thames Policy Area in line with regional policy guidance on the Proposals Map. Development within the Thames Policy Area should protect and where appropriate enhance the special character of the River Thames as set out in the relevant River Thames strategies.

### Riverside Uses

The need to protect river-dependent and river-related uses, including river-related industry (B2) and locally important wharves, boat building sheds and boatyards and other riverside facilities such as slipways, docks, jetties, piers and stairs is based on the Adams Hendry 'Assessment of Boatyard Facilities on the River Thames', GLA, 2007.

### Existing Policy - CP11 River Thames Corridor

11.A The natural and built environment and the unique historic landscape of the River Thames corridor within the Borough will be protected and enhanced, and the special character of the different reaches identified in the Thames Strategy and the Thames Landscape Strategy respected.

11.B River related industries will be protected, and encouraged.

### Existing Policy - CP12 River Crane Corridor

12.A The Council will improve the strategic corridor to provide an attractive open space with improvements to the biodiversity. Developments in and adjacent to the River Crane Corridor will be expected to contribute to improving the environment and access, in line with planning guidance.

### Existing Policy - DM OS 11 Thames Policy Area

The special character of the Thames Policy Area (TPA), as identified on the Proposals Map, will be protected and enhanced by:

1. ensuring development protects the individuality and character, including the views and vistas, of the river and the identified individual reaches;
2. discouraging land infill and development which encroaches into the river and its foreshore other than in exceptional circumstances, which may include where necessary for the construction of river dependent structures such as bridges, tunnels, jetties, piers, slipways etc.;
3. ensuring development establishes a relationship with the river and takes full advantage of its location, addressing the river as a frontage, opening up views and access to it and taking account of the changed perspective with tides;
4. encouraging development which includes a mixture of uses, including uses which enable the public to enjoy the riverside, especially at ground level in buildings fronting the river;
5. protecting and promoting the history and heritage of the river, including landscape features, historic buildings, important structures and archaeological resources associated with the river and ensuring new development incorporates existing features;
6. protecting and improving existing access points to the River Thames, its foreshore and Thames Path, including paths, cycle routes, facilities for launching boats, slipways, stairs etc. and encouraging opening up existing access points to the public, both for pedestrians and boats;
7. requiring public access as part of new developments alongside and to the River Thames, including for pedestrians, boats and cyclists, where appropriate;
8. increasing access to and awareness of the river including from the town centres.

#### **Existing Policy - DM OS 12 Riverside Uses**

Existing river-dependent and river-related uses that contribute to the special character of the River Thames, including river-related industry (B2) and locally important wharves, boat building sheds and boatyards and other riverside facilities such as slipways, docks, jetties, piers and stairs will be protected and enhanced by:

1. ensuring development on sites along the river is functionally related to the river and includes river-dependent or river-related uses where possible, including gardens which are designed to embrace and enhance the river, and to be sensitive to its ecology;
2. requiring an assessment of the effect of the proposed development on any existing river-dependent uses or riverside gardens on the site and their associated facilities on- and off-site; or requiring an assessment of the potential of the site for river-dependent uses and facilities if there are none existing
3. ensuring that residential uses within mixed use schemes along the river are compatible with the operation of the established river-related and river-dependent uses;
4. ensuring that new riverside development incorporates existing river features and takes into account the changing perspective with tides, flood risk, climate change, biodiversity and navigation;
5. encouraging setting back development from river banks and existing flood defences along the River Thames, where practicable.

#### **New Policy LP 18**

##### **River corridors**

A. The natural, historic and built environment of the River Thames corridor and the various watercourses in the borough, including the River Crane, Beverley Brook, Duke of Northumberland River, Longford River and Whitton Brook, will be protected. Development adjacent to the river corridors will be expected to contribute to improvements and enhancements to the river environment.

##### **Thames Policy Area**

B. Development proposals within the Thames Policy Area should respect and take account of the special character of the reach as set out in the Thames Landscape Strategy and Thames Strategy as well as the Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans.

Developments alongside and adjacent to the River Thames should ensure that they establish a relationship with the river, maximise the benefits of its setting in terms of views and vistas, and incorporate uses that enable local communities and the public to enjoy the riverside, especially at ground level in buildings fronting the river.

##### **Public Access**

B. All development proposals alongside or adjacent to the borough's river corridors should:

- a. Retain existing public access to the riverside and alongside the river; and
- b. Enhance existing public access to the riverside where improvements are feasible; or
- c. Provide new public access to the riverside and the foreshore where possible. There is an expectation that all major

development proposals adjacent to the borough's rivers shall provide public access to the riverside and foreshore.

### **River Thames public riverside walk**

C. All development proposals adjoining the River Thames are required to provide a public riverside walk, including for pedestrians and cyclists, which will contribute to the overarching aim of providing a continuous publicly accessible riverside walk.

### **Riverside uses, including river-dependent and river-related uses**

D. The Council will resist the loss of existing river-dependent and river-related uses that contribute to the special character of the River Thames, including river-related industry (B2) and locally important wharves, boat building sheds and boatyards and other riverside facilities such as slipways, docks, jetties, piers and stairs.

This will be achieved by:

1. resisting redevelopment of existing river-dependent or river-related industrial and business uses to non-river related employment uses or residential uses;
2. ensuring development on sites along the river is functionally related to the river and includes river-dependent or river-related uses where possible, including gardens which are designed to embrace and enhance the river, and be sensitive to its ecology;
3. requiring an assessment of the effect of the proposed development on the operation of existing river-dependent uses or riverside gardens on the site and their associated facilities on- and off-site; or requiring an assessment of the potential of the site for river-dependent uses and facilities if there are none existing;

4. ensuring that any proposed residential uses, where appropriate, along the river are compatible with the operation of the established river-related and river-dependent uses;
5. requiring setting back development from river banks and existing flood defences along the River Thames.

**5.7.1** The borough's rivers, their banks and surrounding environments contribute to the special and distinctive character of the borough. The rivers are important components of the wider Green Infrastructure network and provide valuable habitats for wildlife including recreational opportunities for local communities.

**5.7.2** The River Thames runs for 34 kilometres through the borough and forms part of the Blue Ribbon Network. This borough is the only one in London that is intersected by the Thames, therefore benefiting from one of the longest river frontages and associated recreational areas, which gives the borough a unique and historic landscape character. The River Thames connects a variety of landscapes and townscapes, including open stretches of woodland, parks and open spaces, wildlife habitats, important heritage assets as well as industrial and urban waterfronts.

**5.7.3** The borough's Blue Ribbon network does not only contain the River Thames, but other important rivers and waterbodies, including the River Crane, Duke of Northumberland River, Longford River and Beverley Brook. These are also identified as green grid areas in the Mayor of London's All London Green Grid SPG, highlighting the diversity of the borough's green and blue landscapes and environments.

**5.7.4** The River Crane is an important river corridor, which runs for 30 kilometres from Harrow through Twickenham and St Margarets to the Thames at Isleworth, and which has benefited from significant environmental improvements. Where appropriate, developments alongside and adjacent to the River Crane should contribute to the overarching aim of creating a new metropolitan park that provides a continuous, accessible

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link between Hounslow Heath and Twickenham Station, including a long distance footpath, improved access for surrounding communities and an enhanced wildlife corridor.

**5.7.5** Setting back built development from the borough's rivers, including riverbanks and existing flood defences will be encouraged and supported. This will not only allow for the maintenance and future upgrading of the flood defences, but provide opportunities to enhance biodiversity as well as increase and open up public access alongside and to the river. The Council, in conjunction with the Environment Agency, will require a buffer zone of 8 metres on the borough's rivers (including the fluvial Thames) and 16 metres for the tidal Thames.

### Thames Policy Area

**5.7.6** Development proposals within the Thames Policy Area, where appropriate, should ensure that their use and design establishes a positive relationship with the river. Account should be taken of the special and varied characters of the River Thames as set out in detail in the Thames Landscape Strategy (from Hampton to Kew) and the Thames Strategy (from Kew to Chelsea) as well as the Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans.

**5.7.7** Developments alongside and adjacent to the River Thames should:

- protect, and where appropriate enhance, the individuality and character of the reach;
- establish a relationship with the river and address the river as a frontage;
- open up views and vistas to allow the public to appreciate the riverside setting;
- protect and, where opportunities arise, enhance existing access points, including river-dependent structures such as bridges, jetties, piers and slipways;

- allow for public access for pedestrians and cyclists, and where appropriate boats, to enable local communities to gain access to the river and enjoy the riverside;
- ensure appropriate land uses enable the public to enjoy the riverside setting, especially at ground level in buildings fronting the river where possible.

### Public access

**5.7.8** There is public access to much of the riverbank in the borough either by towpath or riverside open spaces. Public access to the river, riverside and the foreshore should be provided as part of new developments adjacent to and alongside the borough's rivers where feasible and appropriate. Existing public access to the borough's rivers should be retained and opportunities should be taken to improve and enhance access arrangements, including creating inclusive access, where possible.

**5.7.9** There are parts of the borough where public access to the rivers, including the River Thames, is limited, such as from Kingston Bridge to Twickenham. There is a long-standing strategy and aim to provide a continuous public riverside walk along both sides of the River Thames. The Council has secured the opportunity to provide considerable sections of public riverside walk by requiring a public path to be provided wherever a development adjoins the River Thames. Therefore, all developments adjacent to the River Thames are required to contribute to the public riverside walk along the River Thames, even if there is currently no public access to the route on either side of the development site.

**5.7.10** The river corridors, including their associated parks and open spaces, provide important opportunities for recreation and healthy lifestyles. Therefore, all major development proposals adjacent to the borough's rivers should provide through-site links to the riverside to enable the public access to the riverside environment.

**5.7.11** Public access to, and alongside, the rivers, for pedestrians, cyclists and boats where appropriate, will be secured through Planning Obligations.



## Riverside uses, including river-dependent and river-related uses

**5.7.12** River-dependent uses are those whose primary purpose is dependent on the river for siting and function. They are defined as an activity which can only be conducted on, in, over or adjacent to the river because the activity requires direct access to the river and which involves, as an integral part of the activity, the use of the water. River-dependent structures which may in exceptional circumstances be permitted to encroach into the river and its foreshore include tunnels, bridges, jetties, piers, and slipways.

**5.7.13** River-dependent facilities, such as boatyards and sheds, public and private wharves, slipways, wet and dry docks and cranes, as well as piers, pontoons, jetties and stairs are essential for the survival of the river-related industry and to support the continued active use of the river. Therefore, they will be protected so they are not lost to other uses. The Council supports in principle the safeguarding of the sites identified in The Mayor's Assessment of Boatyard Facilities on the River Thames (2007).

**5.7.14** River-related industrial and business uses, especially those supporting river-dependent uses involving the construction, repair, sale and servicing of river craft, make a vital contribution to the continuation of the historic tradition and function of the River Thames for transportation, communication and recreation and they also play a role in the local economy. This also includes uses and structures that support water-based passenger, tourism and freight transport as well as water-based sport and leisure activities, including visitor and pleasure craft moorings. River-related uses may also include a garden or park specifically designed to enhance public appreciation and public access to the river.

**5.7.15** The Council will therefore protect the existing river-related industrial and business uses and ensure they are not lost to other uses. The redevelopment of existing river-related industrial and business sites to residential and non river-related business uses will not be permitted. In addition to their functional roles, river-related uses make an irreplaceable

contribution to the character and contrasts of the individual reaches through the activity, distinctive building forms, varied visual interest and historical link they provide.

## 5.8 Moorings and Floating Structures

### Why we are reviewing this policy area

Some minor updates are needed in relation to providing definitions for houseboats, residential moorings, temporary and permanent moorings and in relation to how residential moorings will be considered.

### What the evidence says

There is a need to ensure that any proposal for houseboats, moorings and other floating structures safeguard the character and openness of the River Thames. It should be noted that the London Borough of Richmond has introduced a new Moorings Byelaw that came into effect on 13 March 2015. For further information, see the [Council's website](http://www.richmond.gov.uk/byelaws_and_local_legislation) at [www.richmond.gov.uk/byelaws\\_and\\_local\\_legislation](http://www.richmond.gov.uk/byelaws_and_local_legislation)

### Existing Policy - DM OS 13 Moorings and Floating Structures

Existing houseboats, moorings and other floating structures are an established part of the river scene and will be protected. The River Thames is designated Metropolitan Open Land and the character and openness of the River Thames will be safeguarded from inappropriate uses.

Proposals for new houseboats including extensions to existing houseboats, moorings and other floating structures will only be permitted if they are appropriate developments compliant with Metropolitan Open Land policy. There may be exceptional cases where development is acceptable but only:

1. if it does not harm the character, openness and views of the river, by virtue of its design and height;
2. if the proposed use is river-dependent;
3. if it is a replacement of existing facilities;
4. if there is no interference with the recreational use of the river, riverside and navigation;
5. if there is adequate provision of land based infrastructure and support facilities; and
6. if the proposal is of wider benefits to the community.

#### New Policy LP 19

##### **Moorings and Floating Structures**

A. There is a presumption against new proposals for houseboats, including extensions to existing houseboats, and other moorings or floating structures designed for permanent residential use.

B. A mooring or other floating structure will be supported if it complies with the following criteria:

1. it does not harm the character, openness and views of the river, by virtue of its design and height;
2. the proposed use is river-dependent or river-related;
3. there is no interference with the recreational use of the river, riverside and navigation; and
4. the proposal is of wider benefit to the community.

**5.8.1** The River Thames is designated Metropolitan Open Land and therefore the character and openness of the river will be safeguarded from inappropriate uses. Whilst it is acknowledged that existing houseboats, moorings and other floating structures are an established part of the river scene, houseboats, by definition, are an inappropriate use within Metropolitan Open Land. They can cause problems because of infrastructure provision (such as sewage, waste, water, secure storage and washing), provision of access, servicing and car parking, obstruction to navigation and public access to the river, interference with the recreational use of the river and its foreshores and impacts on the views, local character and amenity of the river. Therefore, new proposals for houseboats, including extensions to existing houseboats and other moorings or floating structures designed for permanent residential uses will be resisted.

**5.8.2** Whilst the Council has limited powers regarding the appearance of boats, planning permission is required for new moorings and change of use of the river bank and river bed for permanent mooring. It should be noted that the Council introduced a Moorings Bylaw in 2015. As such, a criminal offence will be committed if any vessel is moored for longer than permitted without the written consent of the Council. The Environment Agency and the Port of London Authority require houseboats to be licensed and can object to them on navigational grounds. The Environment Agency is also able to object to houseboats on flood risk and biodiversity grounds.

# Climate Change and Sustainable Design 6

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## 6 Climate Change and Sustainable Design

### 6.1 Climate Change Adaptation

#### Why we are reviewing this policy area

The NPPF provides the national policy context in respect of climate change, particularly paragraphs 93-104. Paragraph 99 in particular states that 'Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change'. Some updates are required to include details of the Environment Agency's River Thames Scheme, TE2100 and other initiatives such as Drain London and the Mayor's Climate Change Adaptation Strategy 2011.

Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 as amended by Section 182 of the Planning Act 2008 sets out: "Development plan documents *must* (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaption to, climate change." This is complemented by the policy link to the requirements of the Climate Change Act 2008 at para. 94.

#### What the evidence says

Evidence on the need to address climatic risks affecting the borough are set out in the Council's:

- Strategic Flood Risk Assessment (2016)
- Local Flood Risk Management Strategy 2015-2020
- Climate Change Strategy (2009)

- Surface Water Management Plan (2011)
- Preliminary Flood Risk Assessment (2011)

#### Existing Policy - CP3 Climate Change - Adapting to the likely effects

3.A Development will need to be designed to take account of the impacts of climate change over its lifetime, including:

- Water conservation and drainage
- The need for Summer cooling
- Risk of subsidence
- Flood risk from the River Thames and its tributaries

3.B Development in areas of high flood risk will be restricted, in accordance with PPS25, and using the Environment Agency's Catchment Flood Management Plan, Borough's Strategic Flood Risk Assessment and site level assessments to determine risk.

#### Existing Policy DM SD 4 - Adapting to Higher Temperatures and Need for Cooling

All new developments, in their layout, design, construction, materials, landscaping and operation, are required to take into account and adapt to higher temperatures, avoid and mitigate overheating and excessive heat generation to counteract the urban heat island effect, and meet the need for cooling.

All new development proposals should reduce reliance on air conditioning systems and demonstrate this in accordance with the following cooling hierarchy:

1. minimise internal heat generation through energy efficient design
2. reduce the amount of heat entering a building in summer through shading, reducing solar reflectance, fenestration, insulation and green roofs and walls
3. manage the heat within the building through exposed internal thermal mass and high ceilings
4. passive ventilation
5. mechanical ventilation
6. active cooling systems (ensuring they are the lowest carbon options).

Opportunities to adapt existing buildings, places and spaces to manage higher temperatures should be maximised and will be supported.

## New Policy LP 20

### Climate Change Adaptation

A. The Council will promote and encourage development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property.

B. New development, in their layout, design, construction, materials, landscaping and operation, should minimise the effects of overheating as well as minimise energy consumption in accordance with the following cooling hierarchy:

1. minimise internal heat generation through energy efficient design
2. reduce the amount of heat entering a building in summer through shading, reducing solar reflectance, fenestration, insulation and green roofs and walls
3. manage the heat within the building through exposed internal thermal mass and high ceilings

4. passive ventilation
5. mechanical ventilation
6. active cooling systems (ensuring they are the lowest carbon options).

C. Opportunities to adapt existing buildings, places and spaces to the likely effects of climate change should be maximised and will be supported.

**6.1.1** Climate change adaptation refers to the ability of a system to adjust to climate change (including climate variability and extremes), to take advantage of the opportunities it presents to cope with the consequences. This relates to the adjustment in natural or human systems to a new or changing environment and the understanding of how individuals, groups and natural systems can prepare for and respond to changes in climate.

**6.1.2** Successful adaptation to climate change will depend on how well the issue is recognised and integrated into all decision making processes, and the development industry has a key part to play in this. The purpose of this policy is to ensure that new development is located and designed so it can adapt to and cope with the potential impacts and consequences of climate change such as heat waves. Flood risk, sustainable drainage, green infrastructure, water resources as well as sustainable design and construction are dealt with in more detail in separate policies within this Plan.

**6.1.3** In this policy, 'new development' applies to new build development of 1 dwelling unit or more as well as to new build (including extensions) of 100sqm or more of non-residential floor space.

**6.1.4** The following climatic changes and likely effects should be taken into account when considering the location, layout and design of new development to ensure they are fully resilient to future climate:

- hotter and drier summers, leading to increased cooling demands and water shortages



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- more frequent extreme high temperatures, droughts and increased urban heat island effect (UHI)
- milder and wetter winters, with increases in rainfall, and associated increased fluvial and surface water flooding risks
- more frequent heavy downpours of rain and flash floods
- increases in sea level rise and increases in storm surge height
- decreases in soil moisture content in summer, leading to subsidence and potential effects on tree roots due to drying out of underlying clay
- increase in extreme weather events

**6.1.5** It is predicted that London's summers will get progressively warmer, with an increased likelihood of extreme high temperatures. The absorption and retention of heat results in urban areas becoming warmer at night than rural areas (i.e. the 'urban heat island effect'; UHI). Increased densities, such as in main centres, are likely to increase the intensity of the UHI effect locally and efforts will therefore be required to offset the higher temperatures and UHI effect.

**6.1.6** The cooling hierarchy seeks to reduce any potential overheating and also the need to cool a building through active cooling measures. Air conditioning systems are an energy intensive form of active cooling, with increased carbon dioxide emissions, and the emission of large amounts of heat into the surrounding area.

**6.1.7** Adaptation to higher temperatures should be considered from the outset, not added as an afterthought and new developments should therefore take into account the following:

- Passive design: shading and orientation to reduce excessive solar gain in summer; balancing the need for shade in the summer with the need for light and warmth in the winter. Passive buildings aim to maintain interior thermal comfort throughout the sun's daily and annual cycles whilst reducing the requirement for active heating and cooling systems.
- Orientation of buildings and streets to capture passive ventilation and to reduce excessive solar gain and catch breezes as well as optimising

sky view, thus maximising the rate of urban cooling. Reduce the amount of heat entering a building in summer through its windows (e.g. where windows are located; use of double-glazing).

- The use of light coloured materials on the exterior of buildings can help minimise the need for artificial cooling.
- Use of advanced glazing systems to reduce solar heat gain.
- Cool roofs, including white roofs, built from materials with high solar reflectance, absorb and store less solar energy during the day and thus are not major emitters of heat at night.
- Surfacing material with high solar reflectivity and good water permeability can be a very effective way of reducing high urban temperatures.
- Materials to prevent penetration of heat, including use of cool building materials and green roofs and walls.
- Innovative systems to make use of a building's ability to absorb heat during hot periods so that it can be dissipated in cooler periods.
- A network of high quality green spaces has social, health, ecological, recreational and flood storage benefits and can help to manage and reduce high temperatures. It is important to consider subsidence risk, availability of water, longer growing seasons and the species suitability and ability to adapt to a changing climate ("xeriscaping"). Watering and vegetation care needs to be taken into account, particularly during dry seasons, when water resources become limited.
- "Urban Greening" can be a cost effective approach as trees and vegetation provide evapotranspirative cooling and shade. Roof top temperatures of green roofs may be up to 20-40°C cooler than a conventional flat dark coloured roof.

### 6.2 Flood Risk and Sustainable Drainage

#### Why we are reviewing this policy area

The Council's policies on flood risk are generally in line with national and regional policy and guidance. Some updates are required in relation to the updated Strategic Flood Risk Assessment evidence

base, including in relation to subterranean and basement developments in areas that could be affected by a breach of the raised flood defences. Updates are also required to refer to the Council's role as a Lead Local Flood Authority (LLFA) when assessing surface water drainage proposals. Reference should be made to the requirement for Drainage Statements for all major applications in line with the Local Validation Checklist.

### What the evidence says

The borough is at risk of both tidal and fluvial flooding as well as surface water and groundwater flooding. The Council is a designated Lead Local Flood Authority (LLFA), and under the Flood and Water Management Act (2010), the Council is responsible for managing local flood risk across the borough, including surface water.

Local evidence on flood risk is set out in the following Council documents:

- Strategic Flood Risk Assessment (2016)
- Local Flood Risk Management Strategy 2015-2020
- Preliminary Flood Risk Assessment (2011)
- Surface Water Management Plan (2011): Richmond borough is susceptible to surface water flooding (high likelihood of heavy rainfall and storms overloading the drainage system).
- Sustainable Drainage Systems (SuDS) Guidance Document (2015)

In addition, the Council adopted a Local Validation Checklist in April 2015, with amendments made in September 2015, which requires a Statement on Sustainable Drainage Systems (SuDS) for all major developments; all other developments are encouraged to submit this information as part of the Flood Risk Assessment, Sustainable Construction Checklist or separate statement.

### Existing Policy - DM SD 6 Flood Risk

Development will be guided to areas of lower risk by applying the Sequential Test as set out in paragraph 3.1.35. Unacceptable developments and land uses will be restricted in line with PPS25 and as outlined below. Developments and Flood Risk Assessments must consider all sources of flooding and the likely impacts of climate change.

Where a Flood Risk Assessment is required and in addition to the Environment Agency's normal floodplain compensation requirement, attenuation areas to alleviate fluvial and/or surface water flooding must be considered where there is an opportunity. The onus is on the applicant/developer for proposals on sites of 10 dwellings or 1000sqm of non-residential development or more to provide evidence and justification if attenuation areas cannot be used.

In areas at risk of flooding, all proposals on sites of 10 dwellings or 1000sqm of non-residential development or more are required to submit a Flood Warning and Evacuation Plan.

	Land uses (refer to PPS25) and developments – restrictions	Sequential Test	Exception Test	Flood Risk Assessment
<b>Zone 3b</b>	<p>The functional floodplain as identified in the Borough's Strategic Flood Risk Assessment will be protected by <u>not permitting</u> any form of development on <u>undeveloped sites</u> unless it:</p> <ul style="list-style-type: none"> <li>• is for water-compatible development;</li> <li>• is for essential utility infrastructure which has to be located in a flood risk area and no</li> </ul>	Required for essential utility infrastructure	Required for essential utility infrastructure	Required for all development proposals

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	<p>alternative locations are available and it can be demonstrated that the development would be safe, without increasing flood risk elsewhere and where possible would reduce flood risk overall.</p> <p>Redevelopment of <u>existing developed</u> sites will only be supported if there is no land use intensification and a net flood risk reduction; the restoration of the functional floodplain to its original function will be supported.</p> <p>Proposals for the change of use or conversion to a use with a higher vulnerability classification will <u>not be permitted</u>.</p> <p>Basements, basement extensions, conversions of basements to a higher vulnerability classification or self-contained units will <u>not be permitted</u>.</p>			
<b>Zone 3a</b>	<p>Land uses are restricted to water compatible, less and more vulnerable development. Highly vulnerable developments will not be permitted.</p> <p>Self-contained residential basements and bedrooms at basement level will <u>not be permitted</u>. All basements, basement extensions and basement conversions must have internal access to a</p>	Required for all developments unless exceptions outlined in the justification apply	Required for more vulnerable development	Required for all development proposals

	higher floor and flood resistant and resilient design techniques must be adopted.			
<b>Zone 2</b>	<p>No land use restrictions</p> <p>Self-contained residential basements and bedrooms at basement level will <u>not be permitted</u>. All basements, basement extensions and basement conversions must have internal access to a higher floor and flood resistant and resilient design techniques must be adopted.</p>	Required for all developments unless exceptions outlined in the justification apply	Required for highly vulnerable development	Required for all development proposals unless for change of use from water compatible to less vulnerable
<b>Zone 1</b>	No land use restrictions	Not applicable	Not applicable	<p>Required for sites greater than 1 ha</p> <p>Required for all other development proposals where there is evidence of a risk from other sources of flooding, including surface water, ground water and sewer flooding.</p>

## Existing Policy 1

### Existing Policy - DM SD 7 Sustainable Drainage

All development proposals are required to follow the drainage hierarchy (see below) when disposing of surface water and must utilise Sustainable Drainage Systems (SuDS) wherever practical. Any discharge should be reduced to greenfield run-off rates wherever feasible.

When discharging surface water to a public sewer, developers will be required to provide evidence that capacity exists in the public sewerage network to serve their development.

## Existing Policy 2

### Existing Policy - DM SD 8 Flood Defences

The effectiveness, stability and integrity of the flood defences, river banks and other formal and informal flood defence infrastructure within the borough will be retained and provision for maintenance and upgrading will be ensured. Setting back developments from river banks and existing flood defence infrastructure, where there are opportunities, will be encouraged. The removal of formal or informal flood defences is only acceptable if this is part of an agreed flood risk management strategy by the Environment Agency.

The Environment Agency must be consulted for any development that could affect a flood defence infrastructure.

## New Policy LP 21

### Flood Risk and Sustainable Drainage

A. All developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere. Development will be guided to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance, and where necessary, the 'Exception Test' will be applied. Unacceptable developments and land uses will be refused in line with national policy and guidance, the Council's Strategic Flood Risk Assessment (SFRA) and as outlined in the table below.

In areas at risk of flooding, all proposals on sites of 10 dwellings or more or 1000sqm of non-residential development or more, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted.

Where a Flood Risk Assessment is required, on-site attenuation to alleviate fluvial and/or surface water flooding over and above the Environment Agency's floodplain compensation is required where feasible.

	Land uses and developments – restrictions	Sequential Test	Exception Test	Flood Risk Assessment
<b>Zone 3b</b>	The functional floodplain as identified in the Council's Strategic Flood Risk Assessment will be protected by <u>not permitting</u> any form of development on <u>undeveloped sites</u> unless it:	Required for essential utility infrastructure	Required for essential utility infrastructure	Required for all development proposals

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	<ul style="list-style-type: none"> <li>is for Water Compatible development;</li> <li>is for essential utility infrastructure which has to be located in a flood risk area and no alternative locations are available and it can be demonstrated that the development would be safe, without increasing flood risk elsewhere and where possible would reduce flood risk overall.</li> </ul> <p>Redevelopment of <u>existing developed</u> sites will only be supported if there is no intensification of the land use and a net flood risk reduction is proposed; any restoration of the functional floodplain will be supported.</p> <p>Proposals for the change of use or conversion to a use with a higher vulnerability classification will <u>not be permitted</u>.</p>			
<b>Zone 3a</b>	<p>Land uses are restricted to Water Compatible, Less Vulnerable and More Vulnerable development. Highly Vulnerable developments will not be permitted.</p> <p>Self-contained residential basements and bedrooms at basement level will <u>not be permitted</u>.</p>	Required for all developments unless exceptions outlined in the justification apply	Required for more vulnerable development	Required for all development proposals

<b>Zone 2</b>	<p>No land use restrictions</p> <p>Self-contained residential basements and bedrooms at basement level will <u>not be permitted</u>.</p>	Required for all developments unless exceptions outlined in the justification apply	Required for highly vulnerable development	Required for all development proposals unless for change of use from water compatible to less vulnerable
<b>Zone 1</b>	No land use restrictions	Not applicable	Not applicable	<p>A Drainage Statement is required for sites all major developments.</p> <p>Required for all other development proposals where there is evidence of a risk from other sources of flooding, including surface water, ground water and sewer flooding.</p>

#### Basements and subterranean developments

B. Basements within flood affected areas of the borough represent a particularly high risk to life, as they may be subject to very rapid inundation. Applicants will have to demonstrate that their proposal complies with the following:

<b>Flood Zone 3b (Functional Floodplain)</b>	Basements, basement extensions, conversions of basements to a higher vulnerability classification or self-contained units will <u>not be permitted</u> .
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<b>Flood Zone 3a (Tidal / Fluvial)</b>	<p><b>In areas of Extreme, Significant and Moderate Breach Hazard</b> (as set out in the Council's SFRA):</p> <ul style="list-style-type: none"> <li>● <b>New basements:</b> restricted to Less Vulnerable / Water Compatible use only (no residential uses).</li> <li>● <b>Existing basements:</b> No basement extensions, conversions or additions.</li> </ul> <p><b>In areas of Low or No Breach Hazard</b> (as set out in the Council's SFRA):</p> <ul style="list-style-type: none"> <li>● <b>New basements:</b> if the Exception Test is passed, basements may be permitted for residential use where they are <u>not</u> self-contained or used for bedrooms.</li> <li>● <b>Existing basements:</b> basement extensions, conversions or additions may be permitted for existing developments where they are <u>not</u> self-contained or used for bedrooms.</li> </ul> <p>If a basement, basement extension or conversion is acceptable in principle in terms of its location, it must have internal access to a higher floor and flood resistant and resilient design techniques must be adopted.</p>
<b>Flood Zone 2</b>	<ul style="list-style-type: none"> <li>● <b>New Basements:</b> if the Exception Test is passed, basements may be permitted for residential use where they are <u>not</u> self-contained or used for bedrooms.</li> <li>● <b>Existing Basements:</b> basement extensions, conversions or additions may be permitted for existing developments where they are <u>not</u> self-contained or used for bedrooms.</li> </ul> <p>If a basement, basement extension or conversion is acceptable in principle in terms of its location, it must have internal access to a higher floor and flood resistant and resilient design techniques must be adopted.</p>
<b>Flood Zone 1</b>	No restrictions on new or extensions to existing basements.

### Sustainable drainage

C. The Council will promote and encourage the use of Sustainable Drainage Systems (SuDS) in all development proposals. Applicants will have to demonstrate that their proposal complies with the following:

1. A reduction in surface water discharge to greenfield run-off rates wherever feasible.
2. Where greenfield run-off rates are not feasible, this will need to be demonstrated by the applicant, and in such instances, the minimum requirement is to achieve at least a 50% attenuation

of the site's surface water runoff at peak times based on the levels existing prior to the development.

### Flood defences

D. Applicants will have to demonstrate that their proposal complies with the following:

1. Retain the effectiveness, stability and integrity of flood defences, river banks and other formal and informal flood defence infrastructure.
2. Ensure the proposal does not prevent essential maintenance and upgrading to be carried out in the future.
3. Set back developments from river banks and existing flood defence infrastructure where possible.
4. Take into account the requirements of the Thames Estuary 2100 Plan and demonstrate how the current and future requirements for the River Thames tidal flood defences have been incorporated into the development.
5. The removal of formal or informal flood defences is not acceptable unless this is part of an agreed flood risk management strategy by the Environment Agency.

### Local Flood Risk

**6.2.1** The Environment Agency produces Flood Maps for Planning with a nationally consistent delineation of “high” (Flood Zone 3), “medium” (Flood Zone 2) and “low” (Flood Zone 1) flood zones, which are updated and published on a quarterly basis. In addition, the Council's Strategic Flood Risk Assessment, which is updated regularly, sub-divides the Environment Agency's Flood Zone 3 into “high probability” (Zone 3a) and the “functional floodplain” (Zone 3b). Applicants need to use both flood maps to identify the flood risk relevant to their site. Explanations for the flood zones, land uses and their flood risk vulnerability, are set out in national policy and guidance.

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#### Sequential Test

**6.2.2** Future development in Zone 3a and Zone 2 will only be considered if the 'Sequential Test' has been applied in accordance with national policy and guidance. However, there will be some exceptions to this. The Sequential Test will not be required if it is not a major development <sup>(1)</sup> and at least one of the following applies:

- It is a Local Plan proposal site that has already been sequentially tested, unless the use of the site being proposed is not in accordance with the allocations in the Local Plan.
- It is within a main centre boundary as identified within this Local Plan (Richmond, Twickenham, Teddington, Whitton and East Sheen).
- It is for residential development or a mixed use scheme and within the 400 metre buffer area identified within the Plan or surrounding the centres referred to above.
- Redevelopment of an existing single residential property.
- Conversions and change of use.

**6.2.3** The Sequential Test will be required in all other cases.

**6.2.4** The Council's unique approach to the Sequential Test recognises that relocating development from and around these centres (400 metres is considered to be walking distance from the centres) is not a realistic option and in order to sustain the continuing role of these centres, development can be used as a way to help manage and reduce flood risk in these areas.

#### Functional Floodplain

**6.2.5** The functional floodplain (Zone 3b), as identified within the Council's SFRA, has to be preserved, and where possible, increased (such as through redevelopment proposals) and the impedance to the flow of floodwater reduced.

**6.2.6** Redevelopment of existing developed sites will only be supported if there is a net flood risk reduction. Net flood risk reduction includes both on- and off-site measures, including reducing the land use vulnerability, raising of floor levels, reduction in run-off, increasing flood storage capacity, reduced impedance to flood water flow and the incorporation of flood resilient and/or resistant measures. Finished floor levels are to be raised to a minimum of 300mm above the 1 in 100 fluvial or 1 in 200 tidal flood level (whichever is greater), including an allowance for climate change, as recommended in the Council's SFRA, or to the maximum acceptable height possible below this, should sufficient justification be provided. Opportunities to restore the functional floodplain to its original state / condition are encouraged and will be supported.

**6.2.7** The borough contains a number of islands on the River Thames. Where the access and egress to and from the island is within the functional floodplain, for the purposes of new development, such islands will be considered and treated as functional floodplain (Zone 3b), even if parts of the islands may be within an area of lower probability of flooding.

#### Flood Risk Assessments

**6.2.8** Flood risk assessments (FRA) will be required in line with national policy and guidance. National policy and guidance, as well as the BSI Code of Practice on Assessing and managing flood risk in development (BS 8533:2011), provide detailed information on the requirements for assessing and managing flood risk in development and how to produce site-specific Flood Risk Assessments.

**6.2.9** In addition to fluvial and tidal flooding, properties and infrastructure within the borough are also at risk of flooding from other, more localised sources, such as surface / groundwater / sewer flooding due to surcharging of sewers and drains or due to the failure of infrastructure. Flooding can also occur away from the floodplain as a result of development where off-site infrastructure is not in place ahead of development (also see policy

<sup>1</sup> "Major development is defined in The Town and Country Planning (Flooding) (England) Direction 2007 as: (1) in respect of residential development, a development where the number of dwellings to be provided is 10 or more, or the site area is 0.5 hectares or more; or (2) in respect of non-residential development, a development where the new floorspace to be provided is 1,000 square metres or more, or the site area is 1 hectare or more."

LP 23 in 6.4 'Water Resources and Infrastructure'). In addition, a Flood Risk Assessment is also required for smaller development proposals in Flood Zone 1, where there is evidence of a risk from other sources of flooding identified in the SFRA.

### **Basement and subterranean developments**

**6.2.10** Basements within flood affected areas of the borough represent a particularly high risk to life, and it is essential that careful consideration is given to their design and use. Basements may be subject to very rapid inundation of floodwater and it is essential that the minimum design requirements as set out in this policy as well as in the Council's SFRA are rigorously adhered to.

**6.2.11** This policy restricts basement developments in areas of Extreme, Significant and Moderate Breach Hazard, as set out in the Council's SFRA. As the SFRA is updated regularly, the applicant will need to confirm with the Council whether a development proposal is located within a breach hazard area.

**6.2.12** No essential services or storage space for key provisions and equipment should be located at basement level where they need to remain operational during a flood event.

**6.2.13** The Council's SFRA sets out further guidance on basements, including how to assess ground floor level and internal access level requirements for basements.

### **Flood Emergency Plan**

**6.2.14** In addition to a Flood Risk Assessment (FRA), a Flood Emergency Plan will be required as follows:

- for schemes proposing 10 dwellings or more;

- For schemes of 1000sqm of non-residential development or more; and
- Where safe access/egress cannot be achieved and demonstrated as part of the FRA.

**6.2.15** The main aims of a Flood Emergency Plan are to reduce the risk to life, mitigate damage, and enable a safe and well organised evacuation of occupants of premises during a flood event.

**6.2.16** It is necessary in some instances to identify whether adequate flood warnings would be available and that people using the development will act on them to keep safe. Depending on the nature of a development and the severity of flooding on a site, a flood emergency procedure may entail retreating to a safe place of refuge within the development, leaving the development by a signed safe access route to dry ground beyond the flooded area, or preparing for rescue by the emergency services to safe locations previously identified in a Flood Emergency Plan. More information is provided in the Council's guidance on producing a Flood Emergency Plan.

### **Flood Risk Management**

**6.2.17** The borough is particularly susceptible to surface water flooding and therefore, where a Flood Risk Assessment is required, in addition to the Environment Agency's normal floodplain compensation requirement, on-site attenuation areas to alleviate fluvial and/or surface water flooding should be considered where there is an opportunity.

**6.2.18** Flood resilient and resistant measures should be incorporated into the design of development proposals in any area susceptible to flooding to minimise and manage the risk of flooding. All parties involved on the design and development of buildings are expected to apply BS 85500:2015, which provides guidance to developers and designers on how to improve the flood resistance and resilience of buildings to reduce the impacts of flooding from all sources.

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**6.2.19** Existing developments in areas susceptible to flooding are encouraged to include flood resistant and/or resilient measures to mitigate potential flood risks. Retrofitting properties by integrating flood resilient and resistant measures could help to reduce the consequences of flooding and would ultimately contribute to positively managing flood risk in the borough.

**6.2.20** Applicants and developers are encouraged to use the Environment Agency's Flood Risk Standing Advice for planning applicants and their agents, and early pre-application discussions with the Council and the Environment Agency are encouraged.

### Sustainable Drainage

**6.2.21** The borough is very susceptible to surface water flooding. Surface water flooding happens when the ground and rivers cannot absorb heavy rainfall and when man-made drainage systems have insufficient capacity to deal with the volume of rainfall. Typically this type of flooding is localised and happens very quickly, making it very difficult to predict and give warnings. With climate change predicting more frequent short-duration, high intensity rainfall and more frequent periods of long-duration rainfall, coupled with an ageing Victorian sewer system and increasing pressure from growing populations, surface water flooding is likely to be an increasing problem.

**6.2.22** Therefore, to reduce the risk of surface water and sewer flooding, all development proposals in the borough that could lead to changes to, and have impacts on, surface water run-off are required to follow the London Plan drainage hierarchy:

- store rainwater for later use
- use infiltration techniques, such as porous surfaces in non-clay areas
- attenuate rainwater in ponds or open water features for gradual release to a watercourse
- attenuate rainwater by storing in tanks or sealed water features for gradual release to a watercourse
- discharge rainwater direct to a watercourse

- discharge rainwater to a surface water drain
- discharge rainwater to a combined sewer.

**6.2.23** If discharging surface water to a public sewer, developers are required to provide evidence that capacity exists in the public sewerage network to serve their development in the form of written confirmation. See also policy LP 23 in 6.4 'Water Resources and Infrastructure'.

**6.2.24** The Council's SFRA identified reducing the rate of discharge from development sites to greenfield runoff rates as one of the most effective ways of reducing and managing flood risk within the borough. Greenfield run-off is the surface water drainage regime from a site prior to development. To maintain the natural equilibrium of a site, the surface water discharge from a developed site should not exceed the natural greenfield run-off rate. Where greenfield run-off rates are not technically feasible, applicants will be expected to clearly demonstrate how all opportunities to minimise final site runoff, as close to greenfield rate as practical, have been taken. In such instances, the minimum requirement is to achieve at least a 50% attenuation of the site's surface water runoff at peak times, based on the site's performance prior to development.

**6.2.25** Applicants and developers will need to submit evidence, as part of Flood Risk Assessments and/or requirements set out in the Council's Sustainable Construction Checklist SPD, that the above drainage hierarchy has been followed and SuDS have been utilised where feasible.

**6.2.26** In addition to the above requirements, under the Flood and Water Management Act 2010, the local planning authority has to consult the Lead Local Flood Authority on SuDS for all major development proposals. Therefore, applicants have to submit drainage and surface water management designs as part of the planning process. The satisfactory performance of SuDS depends not only on good design but also adequate maintenance, and provision for adoption and maintenance must be made from the outset. The Council will use planning conditions or obligations to make sure that arrangements are in place for ongoing maintenance over the lifetime of the development.

**6.2.27** Borough-specific guidance on SuDS can be found within the Council's SuDS Guidance Document as well as in the Council's SFRA.

### **Flood defences**

**6.2.28** The protection of people, properties and infrastructure from the risk of fluvial and tidal flooding is essential in this borough and the integrity of the flood defence infrastructure must therefore be maintained. Flood defence infrastructure includes formal and informal flood defences and such defences may not always be recognisable and can include mounds, buildings and walls.

**6.2.29** There is a statutory requirement for the Council to consult the Environment Agency for any development that could affect flood defence infrastructure; as a guide, this requirement applies to proposals within an area of 20 metres from the top of the bank of a main river. There are also parts of the borough, where the formal flood defence is further than 20 metres away from the top of the bank of the river, particularly in relation to the River Thames, and this needs to be taken account of in any development proposal that could affect the defences.

**6.2.30** Proposals for redevelopment should seek opportunities to set back the development from existing flood defences. The Council, in conjunction with the Environment Agency, will require a buffer zone of 8 metres on the borough's rivers (including the fluvial Thames) and 16 metres for the tidal Thames. This is to allow for the maintenance and future upgrading of the flood defences as well as for improvements to flood flow and flood storage capabilities. Applicants are strongly encouraged to liaise with the Environment Agency for any development that could affect flood defence infrastructure as their consent will be required for any works that could affect the flood defences.

**6.2.31** Developments should also take into account the requirements of the Thames Estuary 2100 (TE2100) Plan with regard to the implementation of current and future improvements to the River Thames tidal flood defences in order to effectively manage tidal flood risk over the plan period.

**6.2.32** The River Thames Scheme (Datchet to Teddington) is a proposed programme of projects and investment to reduce flood risk. This includes improvements to Teddington Weir as well as the installation of property level products for existing homes to make them more resistant or resilient to flooding and working with communities to raise flood awareness by supporting them in flood preparedness, response and recovery.

## **6.3 Sustainable Design and Construction**

### **Why we are reviewing this policy area**

This policy area requires updating as a result of changes to national policy and guidance. There is also scope for consolidating existing policies dealing with environmental standards, sustainable design and construction and carbon dioxide emissions. It will also be necessary to reference the Energy Hierarchy in line with the London Plan energy policies. Existing approaches towards renewable and decentralised energy remain policy compliant and are only subject to minor updates.

### **What the evidence says**

The Council's Sustainable Construction Checklist SPD (adopted January 2016) sets out the Council's requirements for sustainable design and construction including the Council's requirements for carbon dioxide reductions. The Council seeks a 35% reduction in CO2 emissions beyond Building Regulations 2013 (currently expressed in existing policy DM SD 1 as a 40% improvement on Building Regulations 2010, which is the equivalent) in line with the Minor Alterations to the London Plan (2015) (MALP). Existing policies need to be updated to reflect this. Recent evidence to support this approach is set out in the MALP evidence produced by the Greater London Authority.



#### **Existing Policy CP1 - Sustainable Development**

1.A The policy seeks to maximise the effective use of resources including land, water and energy, and assist in any reducing long term adverse environmental impacts of development. Development will be required to conform to the Sustainable Construction checklist.

The following principles will be promoted:-

##### **1.B Location of facilities and services**

Should be provided at the appropriate level locally, taking account of the network of town centres identified in policy CP8.

Higher density residential and mixed use developments to be in town centres, near to public transport to reduce the need to travel by car.

##### **1.C Making best use of land**

Maximise the use of existing facilities through management initiatives, such as co-location or dual use.

Redevelopment of sites should only take place where there can be an increase in the number of housing units and/or quantity of commercial floorspace.

Compare the benefits of retaining and, where appropriate, refurbishing existing buildings, against re-development.

##### **1.D Reducing environmental impact**

Minimise the use of open land for development and seek to maintain the natural vegetation, especially trees.

Minimising local environmental impacts of development with respect to factors such as noise, air quality and contamination.

1.E Seek environmental gain to compensate for any environmental cost of development

#### **Existing Policy 3**

##### **Existing Policy CP2 - Reducing Carbon Emissions**

2.A The Borough will reduce its carbon dioxide emissions by requiring measures that minimise energy consumption in new development and promoting these measures in existing development, particularly in its own buildings.

2.B Prioritise the development and use of decentralised energy, particularly through development in the Twickenham area.

2.C Increase the use of renewable energy by requiring it in new development and promoting its use in existing development.

#### **Existing Policy 4**

##### **Existing Policy DM SD 1 - Sustainable Construction**

All development in terms of materials, design, landscaping, standard of construction and operation should include measures capable of mitigating and adapting to climate change to meet future needs.

New buildings should be flexible to respond to future social, technological and economic needs by conforming to the Borough's Sustainable Construction Checklist SPD.

New homes will be required to meet or exceed requirements of the Code for Sustainable Homes Level 3.

New non-residential buildings over 100sqm will be required to meet the relevant BREEAM 'excellent' standards. For conversions see Retrofitting.

They also must achieve a minimum 25 per cent reduction in carbon dioxide emissions over Building Regulations (2010) in line with best practice from 2010 to 2013, 40 per cent improvement from 2013 to 2016, and 'zero carbon' standards <sup>(2)</sup> from 2016. It is expected that efficiency measures will be prioritised as a means towards meeting these targets. These requirements may be adjusted in future years to take into account the then prevailing standards and any other national guidance to ensure the standards are met or exceeded.

### Existing Policy 5

#### Existing Policy DM SD 2 - Renewable Energy and Decentralised Energy Networks

New development will be required to conform with the Sustainable Construction Checklist SPD and:

(a) Maximise opportunities for the micro-generation of renewable energy. Some form of low carbon renewable and/or de-centralised energy will be expected in all new development, and

(b) Developments of 1 dwelling unit or more, or 100sqm of non-residential floor space or more will be required to reduce their total carbon dioxide emissions by following a hierarchy that first requires an efficient design to minimise the amount of energy used, secondly, by using low carbon technologies and finally, where feasible and viable, including a contribution from renewable sources.

(c) Local opportunities to contribute towards decentralised energy supply from renewable and low-carbon technologies will be encouraged where there is no over-riding adverse local impact.

(d) All new development will be required to connect to existing or planned decentralised energy networks where one exists. In all major developments and large Proposals Sites identified in the (forthcoming) Site Allocations DPD, provision should be made for future connection to a local energy network should one become available.

### Existing Policy 6

#### Existing Policy DM SD 3 - Retrofitting

High standards of energy and water efficiency in existing developments will be supported wherever possible through retrofitting. Proposals for conversions and extensions will be encouraged to comply with the Sustainable Construction Checklist SPD as far as possible and opportunities for micro-generation of renewable energy will be supported.

Development in an area susceptible to flooding should include flood resistant and/or resilient measures to mitigate potential flood risks.

#### Existing Policy 7

##### **Existing Policy DM SD 9 - Protecting Water Resources and Infrastructure (part extract)**

The borough's water resources and supplies will be protected by resisting development proposals that would pose an unacceptable threat to surface water and groundwater quantity and quality. This includes pollution caused by water run-off from developments into nearby waterways.

New developments must achieve a high standard of water efficiency by:

1. meeting the minimum mandatory target for water consumption as set out in the Code for Sustainable Homes, or
2. meeting a minimum of 2 credits on water consumption for other types of developments (BREEAM "excellent"), or
3. meeting a minimum of 3 credits on water consumption for conversions (EcoHomes "excellent"), and
4. utilising rainwater harvesting for all external water uses to reduce the consumption of potable water wherever possible.

The above requirements may be adjusted in future years to take into account the then prevailing standards and any other national guidance to ensure that these standards are met or exceeded.

New developments should also consider the following:

1. utilising rainwater harvesting and greywater recycling for all non-potable uses to reduce the consumption of potable water wherever possible, and
2. designing of landscaping to minimise water demand.

#### New Policy LP 22

##### **Sustainable Design and Construction**

A. Developments will be required to achieve the highest standards of sustainable design and construction in order to mitigate against climate change. Applicants will be required to comply with the following:

1. Development of 1 dwelling unit or more, or 100sqm or more of non-residential floor space (including extensions) will be required to comply with the Sustainable Construction Checklist SPD. A completed Checklist has to be submitted as part of the planning application.
2. Development that results in a new residential dwelling, including conversions, change of use, and extensions that result in a new dwelling unit, will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption).
3. New non-residential buildings over 100sqm will be required to meet BREEAM 'Excellent' standard.
4. Proposals for change of use to residential will be required to meet BREEAM Domestic Refurbishment 'Excellent' standard (where feasible).

##### **Reducing Carbon Dioxide Emissions**

B. Developers are required to incorporate measures to improve energy conservation and efficiency as well as contributions to renewable and low carbon energy generation. Proposed developments are required to meet the following minimum reductions in carbon dioxide emissions:

1. All new residential buildings should achieve a 35% reduction.
2. All major non-residential buildings should achieve a 35% reduction.

Targets are expressed as a percentage improvement over the target emission rate (TER) based on Part L of the 2013 Building Regulations.

C. This should be achieved by following the Energy Hierarchy:

1. Be lean: use less energy
2. Be clean: supply energy efficiently
3. Be green: use renewable energy

The Council is committed to working towards zero carbon standards for all new developments (residential and non-residential).

### **Decentralised Energy Networks**

D. The Council requires developments to contribute towards the Mayor of London target of 25% of heat and power to be generated through localised decentralised energy (DE) systems by 2025. The following will be required:

1. All new development will be required to connect to existing DE networks where feasible. This also applies where a DE network is planned and expected to be operational within 5 years of the development being completed.
2. Development proposals of 50 units or more, or new non-residential development of 1000sqm or more, will need to provide an assessment of the provision of on-site decentralised energy (DE) networks and combined heat and power (CHP).
3. Where feasible, new development of 50 units or more, or new non-residential development of 1000sqm or more, as well as schemes for the Proposal Sites identified in this Plan, will need to provide on-site DE and CHP; this is particularly necessary within the clusters identified for DE opportunities in the borough-wide Heat Mapping Study. Where on-site provision is not feasible, provision should be made for future connection to a local DE network should one become available.

Applicants are required to consider the installation of low, or preferably ultra-low, NOx boilers to reduce the amount of NOx emitted in the borough.

Local opportunities to contribute towards decentralised energy supply from renewable and low-carbon technologies will be encouraged where appropriate.

### **Retrofitting**

E. High standards of energy and water efficiency in existing developments will be supported wherever possible through retrofitting. Householder extensions and other development proposals that do not meet the thresholds set out in this policy are encouraged to comply with the Sustainable Construction Checklist SPD as far as possible, and opportunities for micro-generation of renewable energy will be supported in line with other policies in this Plan.

**6.3.1** This policy seeks to ensure that all new development and refurbishment is as sustainable as possible in order to mitigate the impact of development on the environment. All new buildings should be built to a standard which minimises the consumption of resources during construction and occupation. The policy takes forward the Council's commitment to sustainable construction and design. Where the policy exceeds national standards, this is based on local evidence and justification.

**6.3.2** The Council's Sustainable Construction Checklist SPD will be applied to development which involves the creation of one or more residential units, and commercial or other developments of 100sqm or more (including extensions). Applicants are required to submit an Energy Statement to show how the requirements of the themes within the Checklist have been met within the proposed new development.

### **Water efficiency**

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**6.3.3** London is classified as 'seriously' water stressed, meaning that more water is taken from the environment than the environment can sustain in the long term. London's water supply and demand is finely balanced and climate change as well as population growth will increase the risk of drought and impacts on the environment. Predicted higher temperatures due to climate change and a growing population mean that the borough's estimated water supply availability (in a dry year) is shown to be in significant deficit. Therefore, high standards of water efficiency will be required in new developments in order to address the fact that drinking water is becoming an increasingly limited resource in this borough. New developments, in their design, landscaping, construction and operation, should incorporate measures to avoid water wastage.

**6.3.4** The Council has adopted the 'optional' higher national technical standard for water consumption of 110 litres per person per day (including an allowance of 5 litres or less per person per day for external water consumption) in line with the national technical standard set out in Part G of the Building Regulations 2013. All new residential developments including conversions, reversions, change of use and extensions that create one or more new dwellings must meet this target.

**6.3.5** A minimum of 2 credits on water consumption will be required for all other types of developments in order to achieve BREEAM "excellent". Where a BREEAM assessment is not technically feasible, applicants should incorporate best practice water saving and recycling measures as outlined in the Sustainable Construction Checklist SPD.

**6.3.6** A number of water saving measures and equipment may be incorporated into developments to achieve the maximum water consumption levels:

- There should be full use of water saving devices, water efficient fixtures and fittings.
- Rainwater and grey water recycling (water butts or more complex collection and treatment systems) can significantly reduce water consumption, particular potable water. Grey water recycling will need to be energy efficient.

- Landscaping and gardens should be designed to lower water demand.
- Sustainable Drainage Systems (SuDS), including rainwater harvesting and storage from roofs and other surfaces can significantly reduce demand for water.

### Reducing carbon dioxide emissions

**6.3.7** The Council requires developments to make a significant contribution towards the Mayor of London target to achieve a 60% reduction in London's carbon dioxide emissions by 2025 against a 1990 baseline (this exceeds the national Government target).

**6.3.8** The Council promotes the move towards a low carbon economy and remains committed to working towards zero carbon standards for all new developments. Future changes to energy efficiency standards will be kept under review and policy requirements will be updated with the prevailing standards if required.

**6.3.9** All development proposals should apply the following Energy Hierarchy:

1. First, an efficient design to minimise the amount of energy use and developments. Energy use in new development can be reduced by appropriate siting, design, landscaping and energy efficiencies within the building, and these can be retro-fitted to existing buildings. All new developments are required to conform to the Sustainable Construction Checklist. New developments as well as conversions and refurbishments will be expected to achieve high environmental standards. Designing for minimum energy use and reducing predicted site CO2 emissions should be addressed in an energy statement.
2. Second, the use of low carbon technologies such as decentralised energy networks. Decentralised Energy (DE) systems generate power at the point of use which is more efficient than centralised electricity



generation where both heat and energy are wasted in production and transmission. DE will be predominantly based around combined heat and power (CHP), district heating and cooling.

3. Finally, where feasible and viable, a contribution from renewable sources should be included.

**6.3.10** The Council will require an assessment of energy demand and carbon dioxide emissions from the proposed development, which should demonstrate the expected energy and emissions savings from energy efficiency and renewable energy measures incorporated into the development. Due to the built up nature of most of the borough, wind turbines are unlikely to be suitable, but other renewable technologies such as photovoltaic cells, solar panels, ground and air source heat pumps and other forms of renewable energy may be appropriate in many parts of the borough, subject to other policies within this Plan.

**6.3.11** The Energy Statement must demonstrate how the energy requirements will be met in line with the Energy Hierarchy. The Energy Statement should set out how the proposal will achieve a 35% reduction in carbon dioxide emissions. The target of 35% is expressed as minimum improvement over the Target Emission Rate (TER) outlined in the national Building Regulations (2013).

**6.3.12** The Council recognises that there may be instances where it is not technically feasible for a development to achieve a 35% reduction in carbon dioxide emissions over Building Regulations (2013). In such cases an applicant will have to demonstrate and set out clearly in the Energy Statement why the carbon dioxide emissions reduction target cannot be met. It should be noted that the Council (as of 2016), does not operate a carbon dioxide offsetting scheme; however Planning Obligations to secure financial contributions may be required in the future in line with the Planning Obligations SPD, for example to support off-site carbon dioxide reduction measures where it is technically not feasible to achieve all carbon dioxide emission reductions through on-site measures.

**6.3.13** Where conflict between climate change objectives and the conservation of heritage assets is unavoidable, the public benefit of mitigating the effects of climate change will be weighed against any harm to the significance of the heritage asset, in accordance with national, London Plan and the council's planning policies.

### Decentralised Energy Networks

**6.3.14** Decentralised Energy (DE) is a local or sub-regional supply of heat and electricity from a central source (i.e. an Energy Centre). The Energy Centre normally hosts one or more Combined Heat and Power (CHP) units, which co-produce electricity and heat, for which a wide range of technologies and fuels can be used. The heat output of a CHP plant can also be used to provide cooling via absorption chillers; these installations are known as Combined Cooling, Heat and Power (CCHP).

**6.3.15** The Mayor has set a target for London to generate 25% of its heat and power requirements through the use of district heating networks and other forms of decentralised energy systems by 2025. There is an expectation that the provision and availability of DE networks for developments to connect to, will increase during the lifetime of this Plan. As such, all new development will be required to connect to existing DE networks where feasible. This also applies where a DE network is planned and expected to be operational within 5 years of the development being completed.

**6.3.16** Applicants for development proposals of 50 units or more, or new non-residential development of 1000sqm or more, will be required to provide an assessment of the provision of on-site decentralised energy (DE) networks and combined heat and power (CHP). In addition, all applications for developments of 50 units or more, or new non-residential development of 1000sqm or more, should assess the feasibility of providing Decentralised Energy (DE) and Combined Heat and Power (CHP) on their site.

### Pre-Publication Local Plan

**6.3.17** The borough-wide Heat Mapping Study identified the following 7 clusters with opportunities for DE networks in the borough (maps of these areas are set out in the Study, which is available on the Council's website):

- Richmond Centre
- Teddington
- Mortlake
- Twickenham Centre
- Richmond-Wandsworth
- Richmond-Kingston
- Richmond-Hounslow

**6.3.18** Fuel combustion as part of CHPs can potentially give rise to air pollutants, particularly oxides of nitrogen (NOx), which can have a negative impact on health. Therefore, developers are required to consider the installation of low, or preferably ultra-low, NOx boilers to reduce the amount of NOx emitted in the borough. Further details and guidance can be obtained from the Council.

### Conversions and refurbishment

**6.3.19** Conversions and extensions that can be assessed under the BREEAM Domestic Refurbishment scheme are required to meet the "excellent" standard. If a scheme cannot be assessed under BREEAM (such as where the proposal only relates to minor internal re-modelling work), written confirmation will have to be provided as part of the planning application by an accredited assessor.

**6.3.20** Retrofitting existing properties, particularly residential buildings, presents a significant opportunity to help meet the carbon emission reduction target. Adapting and retrofitting existing homes provides the opportunity to make them more comfortable, marketable, resource efficient, and fit for purpose in the present and the future. Compliance with the energy and water saving sections of the Sustainable Construction Checklist SPD is encouraged for all schemes that do not meet the size threshold for the Checklist to be submitted, such as householder extensions.

**6.3.21** The sensitivity of existing developments, in particular heritage assets, in terms of their historic fabric and significance, should be considered before developing methods in which to retrofit higher standards of energy and water efficiency.

### Summary of requirements

**6.3.22** The table below summarises the sustainable design and construction standards that must be met for different types of developments.

Type of development	Standards to be met
All development that results in a new residential dwelling or unit including conversions, reversions, change of use and extensions that create one or more new dwellings	<ul style="list-style-type: none"> <li>• 35% reduction in CO2 emissions over Building Regulations (2013)</li> <li>• Submit energy statement</li> <li>• National water standards - 110 l/p/d</li> <li>• Submit Sustainable Construction Checklist</li> </ul>
Change of use or conversion to residential and residential extensions which do not result in a new dwelling	<ul style="list-style-type: none"> <li>• BREEAM Domestic Refurbishment 'Excellent' (where feasible)</li> <li>• Submit Sustainable Construction Checklist</li> </ul>
New non-residential buildings, including extensions, over 100sqm	<ul style="list-style-type: none"> <li>• BREEAM 'Excellent'</li> <li>• 35% reduction in CO2 emissions over Building Regulations (2013)</li> <li>• Submit energy statement</li> <li>• Submit Sustainable Construction Checklist</li> </ul>

## 6.4 Water Resources and Infrastructure

### Why we are reviewing this policy area

This policy area is in line with national and regional policy insofar as it seeks to protect water resources by encouraging water efficiency and improving the quality of rivers and groundwater and seeks to ensure sufficient capacity for surface water, foul drainage and sewerage treatment.

Minor updates are required to reflect most recent national standards for water efficiency in line with the Building Regulations. Minor updates to the policy on public sewerage and water supply networks may be required following liaison with Thames Water Utilities

### What the evidence says

All water companies that serve London are located in areas classified as seriously water stressed. Therefore, the Council has adopted the optional higher standard for mains water consumption of 110 litres or less per person per day (including an allowance of 5 l/p/d for external water consumption) as set out in Part G of the Building regulations. This is in line with the London Plan and translates closely to the Council's previous policy requirement (of 105 l/p/d).

### Existing Policy 8

#### Existing Policy DM SD 9 - Protecting Water Resources and Infrastructure (part extract)

The borough's water resources and supplies will be protected by resisting development proposals that would pose an unacceptable threat to surface water and groundwater quantity and quality. This includes pollution caused by water run-off from developments into nearby waterways.

New developments must achieve a high standard of water efficiency by:

1. meeting the minimum mandatory target for water consumption as set out in the Code for Sustainable Homes, or
2. meeting a minimum of 2 credits on water consumption for other types of developments (BREEAM "excellent"), or
3. meeting a minimum of 3 credits on water consumption for conversions (EcoHomes "excellent"), and
4. utilising rainwater harvesting for all external water uses to reduce the consumption of potable water wherever possible.

The above requirements may be adjusted in future years to take into account the then prevailing standards and any other national guidance to ensure that these standards are met or exceeded.

New developments should also consider the following:

1. utilising rainwater harvesting and greywater recycling for all non-potable uses to reduce the consumption of potable water wherever possible, and
2. designing of landscaping to minimise water demand.

Proposals that seek to increase water availability or protect and improve the quality of rivers or groundwater will be encouraged.

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The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact.

The Council will support in principle the implementation of the Thames Tunnel project.

Where rivers have been classified by the Environment Agency as having 'poor' status (currently the River Crane, the Beverley Brook and the River Thames, upstream of Teddington), any development affecting such rivers is encouraged to improve the water quality in these areas.

#### Existing Policy 9

##### Existing Policy DM SD 10 - Water and Sewerage Provision

New development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development.

Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:

1. sufficient capacity already exists, or
2. extra capacity can be provided in time to serve the development, which will ensure that the environment and the amenities of local residents are not adversely affected.

Developers will be required to provide evidence that capacity exists in the public sewerage and water supply network to serve their development.

Any new water supply, sewerage or waste water treatment infrastructure must be in place prior to occupation of the development. Financial contributions may be required for new developments towards the provision of, or improvements to such infrastructure.

#### New Policy LP 23

##### Water Resources and Infrastructure

A. The borough's water resources and supplies will be protected by resisting development proposals that would pose an unacceptable threat to the borough's rivers, surface water and groundwater quantity and quality. This includes pollution caused by water run-off from developments into nearby waterways.

##### Water Quality

B. The Council encourages proposals that seek to increase water availability or protect and improve the quality of rivers or groundwater.

The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact.

Where rivers have been classified by the Environment Agency as having 'poor' status, any development affecting such rivers is encouraged to improve the water quality in these areas.

##### Water and sewerage provision

C. New major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development.

Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:

1. sufficient capacity already exists, or
2. extra capacity can be provided in time to serve the development, which will ensure that the environment and the amenities of local residents are not adversely affected.

Applicants for major developments will be required to provide evidence in the form of written confirmation as part of the planning application that capacity exists in the public sewerage and water supply network to serve their development.

Any new water supply, sewerage or waste water treatment infrastructure must be in place prior to occupation of the development. Financial contributions may be required for new developments towards the provision of, or improvements to, such infrastructure.

## Water quality

**6.4.1** The Council seeks to protect and improve water quality to ensure that the Blue Ribbon Network is healthy, attractive and offers a valuable series of habitats. Proposals that have the potential to lead to a reduction in water quality will be resisted.

**6.4.2** Under the Water Framework Directive (WFD), there are four river water-bodies in this borough, all of which fail to achieve 'good' ecological status under the WFD. The Beverley Brook, the Thames (upstream of Teddington) and the Crane water-bodies have been classified as having 'poor' ecological status and the Longford River has 'moderate' ecological

status. Developments adjacent to, or with the potential to affect, these rivers are encouraged to include measures such as managing the run-off or improving surface water outfalls, in order to improve their water quality.

**6.4.3** Some local surface water and groundwater bodies in the gravel aquifer are hydraulically connected. Potentially contaminative uses will be directed away from locations that are particularly sensitive in terms of groundwater and surface water receptors in order to protect the surface water courses and the groundwater quality of the borough's aquifers.

## Water and sewerage provision

**6.4.4** Many existing water mains, sewerage systems and treatment works are becoming overloaded. It is essential to ensure that such infrastructure is in place ahead of development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low-pressure water supply problems. Consequently, development should only take place where the new demand upon existing infrastructure is taken into account.

**6.4.5** Applicants for major development proposals (both residential as well as non-residential) are required to provide evidence that adequate capacity exists in the public sewerage and water supply network to serve their development in the form of written confirmation. This statement should be submitted as part of the planning application.

**6.4.6** Where capacity does not exist and to avoid overloading of existing infrastructure, a drainage strategy should be provided to show the required infrastructure and its funding. Where there is a capacity problem and no improvements are programmed by Thames Water Utilities, the developer will be required to contact Thames Water to agree what improvements are required and how they will be funded. If improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements. Any sewerage/waste water treatment infrastructure must be in place prior to first occupation of the development. A financial contribution may be required towards the



### Pre-Publication Local Plan

provision of, or improvements to, infrastructure. Sewers and associated infrastructure will need to be protected from new construction and tree planting.

#### 6.5 Waste Management

##### Why we are reviewing this policy area

Core Strategy policy CP6 and the saved UDP policy on waste were superseded by the adoption of the West London Waste Plan (WLWP) in 2015. There is a need for a new local waste management policy that should consider the requirements for developers to produce site waste management plans and for the efficient handling of construction, excavation and demolition waste and materials (in line with London Plan policy). Other points that should be considered are: ensuring that new development, including changes of use, provides accessible, adequate and well-designed internal and external storage facilities for residual waste and recycling; encouragement for waste to be treated as close to the source as possible; maximising the potential use of rail and water transport; reference to the Refuse and Recycling Storage Requirements SPD (2015) and to the WLWP (2015).

##### What the evidence says

The Council is required to meet the London Plan apportionment requirements and comply with national policy and the national waste management plan. London Plan Policy 5.16 sets a target of 95 per cent for recycling / reuse of construction and demolition waste by 2020 and this should be reflected in the Council's Local Plan policy.

Due to the adoption of the West London Waste Plan (WLWP) (2015), local Core Strategy policy CP6 and UDP policy CCE22 have been superseded. There is an adopted SPD on Refuse and Recycling Storage Requirements (2015) that should be referred to in any policy.

##### Existing Policy CP6 - Waste

This Borough supports the objectives of sustainable waste management and will:

6.A Maximise self-sufficiency in waste management capacity (in line with London Plan target of 85% self-sufficiency within London by 2020).

6.B Seek to minimise waste creation, increase household recycling and composting rates to at least 40% by 2010, 50% by 2020, address waste as a resource and look to disposal as the last option, in line with the waste hierarchy.

6.C Work with its partners in the West London Waste Authority to prepare a Joint Waste Plan, which will identify locations suitable for waste management facilities to meet The London Plan consolidated with Alterations since 2004 apportionment and other requirements.

6.D Safeguard and improve existing waste sites at Craneford Way, Twickenham and Townmead Road, Kew unless compensatory provision is made.

6.E Monitor changes in the stock of waste management facilities, waste arisings, and the amount of waste recycled, recovered and going for disposal.

## New Policy LP 24

### Waste Management

The Council will ensure that waste is managed in accordance with the waste hierarchy, which is to reduce, reuse or recycle waste as close as possible to where it is produced. The Council will require the following:

1. All developments, including conversions and changes of use are required to provide adequate refuse and recycling storage space and facilities, which allows for ease of collection and which residents and occupiers can easily access, in line with the Council's SPD on Refuse and Recycling Storage Requirements.
2. All developments need to ensure that the management of waste, including the location and design of refuse and recycling facilities, is sensitively integrated within the overall design of the scheme, in accordance with policies on Local Character and Design.
3. Development proposals, where appropriate, should make use of the rail and the waterway network for the transportation of construction, demolition and other waste.
4. All major developments, and where appropriate developments that are likely to generate large amounts of waste, are required to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials.

Proposals affecting existing waste management sites, as well as proposals for new or additional waste management facilities, will be assessed against the policies of the West London Waste Plan (2015).

**6.5.1** The Council will ensure that waste collection and disposal arrangements are developed in accordance with the principles of sustainability based on the Waste Management Hierarchy:

1. prevention or reduction;
2. re-use and preparation for reuse;
3. recycling and composting;
4. recovery; and lastly
5. disposal to landfill or incineration without energy recovery.

**6.5.2** This policy seeks to minimise the amount of waste going to landfill and contributes towards the borough being more self-sufficient in dealing with its waste. In addition, the Council considers the layout, siting, function and design of recycling and refuse storage facilities to be an integral part of the development process. If considered at the initial stage of the design process, proposals for new developments can integrate refuse and recycling within the scheme without causing undue noise and odour nuisance or other impacts on amenity and living conditions.

**6.5.3** This policy ensures that all development proposals provide adequate refuse and recycling storage space and facilities to serve the new developments, in line with the Council's SPD on Refuse and Recycling Storage Requirements.

**6.5.4** London is moving towards waste self-sufficiency, and the Mayor of London aims to manage as much of its waste within London as practicable, and sending zero biodegradable and recyclable waste to landfill by 2031. To achieve this, the Council adopted the West London Waste Plan (WLWP) in 2015 in partnership with the West London Waste Authority boroughs of Brent, Ealing, Harrow, Hillingdon and Hounslow (this also includes the Old Oak and Park Royal Development Corporation). This sets out how the boroughs will manage their waste apportionment requirements as set out in the London Plan.

**6.5.5** The WLWP identifies a range of suitable sites for the management of all West London's waste up to 2031. It includes policies and guidelines for determining planning applications for waste developments and ensures that facilities are provided to meet the amount of waste allocated to the West London Waste area through the London Plan.

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**6.5.6** The Council will apply the policies of the WLWP when dealing with applications affecting existing waste sites, such as the Central Depot in Twickenham, the Civic Amenity site in Townmead Road or any other sites with waste management or treatment facilities as identified in the WLWP. In addition, the policies of the WLWP will be used for assessing proposals for new or additional waste management facilities in the borough.

**6.5.7** The Council will work with partners in the West London Waste Authority when dealing with West London's waste, and ensure that the West London Waste Authority boroughs achieve net self-sufficiency and contribute to the Mayor of London's aim of managing the equivalent of 100% of London's waste within London by 2031 and work towards zero biodegradable or recyclable waste to landfill by 2031.

# Town Centres 7

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## 7 Town Centres

### 7.1 Development in Centres

#### Why we are reviewing this policy area

There continues to be a need for an overarching policy on the approach to the development of centres across the borough. This policy sets out the centre hierarchy as required by the NPPF. The opportunity has been taken to consolidate and streamline existing policies, and this draft policy deals with development in the five main centres as well as the smaller centres in the borough.

#### What the evidence says

The policy approach is based on an up-to-date Retail Study. Consultants Nathaniel Lichfield and Partners were commissioned by the Council to produce a retail study, which was published in 2014. The Study estimates a modest need to increase floorspace for retail (Use Class A1) and the food and drink sector (Use Classes A3, A4 and A5) over the plan period, much of which will be focused in Richmond main centre. The Study also took account of anticipated changes in patterns in retail and shopping, including the rise of online shopping.

The Council published town centre health checks in 2013, and land uses in all centres are surveyed annually. The data suggests that centres in the borough are generally healthy with vacancy rates well below the national average. In establishing the hierarchy the Council took into account the Mayor's Town Centre Network, analysis of the health of centres and the forecasts of retail need.

The Village Planning process has highlighted the importance of centres and parades to borough residents. The new draft policy also draws on the outcomes of that process.

#### Existing Policy CP 8 - Town and Local Centres

A. The Borough's town and local centres have an important role, providing shops, services, employment opportunities, housing and being a focus for community life.

Retail and town centre uses will be supported providing that it is appropriate to the role in the hierarchy of the centres, and respects the character, environment and historical interest of the area. It should be of an appropriate scale for the size of the centre and not adversely impact on the vitality and viability of any existing centre. Out of town retail development is not usually considered appropriate in this Borough in line with The London Plan consolidated with Alterations since 2004.

The Council will improve the local environment to provide centres which are comfortable, attractive and safe for all users. The historic environment and river frontage will be protected.

B. The Council has identified the following hierarchy of centres:

Type of Centre	Name of Centre
Major town centre(with many shops services, employment and entertainment which service a much wider catchment than just the local population)	Richmond
District centres(shops and services primarily serving local catchments but providing for main weekly convenience shopping)	Twickenham, Teddington, East Sheen and Whitton



Local centres(shops and services for day to day needs, some small offices)	Barnes, East Twickenham, Hampton Hill, Hampton Village, Ham Common, Kew Gardens Station, St Margaret's
Neighbourhood centres(shops and services for day to day needs)	Castelnau; Friars Stile Road; Hampton Wick; Heathside (Powder Mill lane); Sheen Road; Kingston Road, Teddington; Stanley Road, Teddington; White Hart Lane
Parades of local importance	Various across the Borough

C. The approach towards each of the centres will be as follows:

Town Centre	Richmond Town Centre	Twickenham, Teddington, Whitton, and East Sheen	Local & Neighbourhood Centres
Objective	Maintain and reinforce the centre as the location for major offices, retail (particularly comparison goods and specialist retail) and service uses, arts, culture, and leisure and tourism facilities. Make use of potential for tall buildings in station area	Maintain and reinforce the centres' retail role (both for convenience and comparison goods to meet weekly shopping requirements) and maintain the level of service uses; encourage other uses of a scale appropriate to district centres. Twickenham only - make use of potential for tall buildings in station area	Strengthen neighbourhood and local centres by encouraging a range of shops, services and other uses consistent with meeting people's day to day needs. Encourage other uses of a scale appropriate to the centre
Business and Employment	Suitable for major office development; net increase in jobs to 2021 - 3,000.	<u>Twickenham</u> : suitable for major office development (See CP09), net increase in jobs to 2021 - 2,500. <u>Others</u> : Maintaining level of offices but not significant expansion, net increase in jobs to	Maintain premises for small businesses.

Town Centre	Richmond Town Centre	Twickenham, Teddington, Whitton, and East Sheen	Local & Neighbourhood Centres
		2021 - Teddington (includes Hampton) - 1,600 East Sheen - 100 Whitton - 50.	
The Night Time Economy	Maintain rather than expand capacity of drinking establishments and night clubs;	<u>All</u> : Limit drinking establishments and night clubs to a scale compatible to local need <u>Twickenham</u> : Provide a range of evening activity to promote a more diverse evening economy attractive to all age groups	Limit drinking establishments and night clubs to a scale compatible to local need.
Car Parking	Not provide for an expansion of car parking but manage in order to maintain vitality and viability of the centre	<u>Twickenham &amp; Teddington</u> : not provide for an expansion of car parking but manage in order to maintain vitality and viability of the centre <u>East Sheen &amp; Whitton</u> : Additional parking may be considered as part of retail schemes	Not provide additional car parking but manage in order to maintain vitality and viability of the centre
Public Transport	Improve public transport and particularly Richmond Station interchange facilities, the bus station and bus stops	Improve public transport and particularly Twickenham and Mortlake Station and bus stops	Improve public transport where necessary
Residential	Encourage higher density, including affordable and small units; and car free development;	Encourage higher density, including affordable and small units; and, particularly in Twickenham, car free development	Encourage density suitable for its site including small units

Town Centre	Richmond Town Centre	Twickenham, Teddington, Whitton, and East Sheen	Local & Neighbourhood Centres
<b>Retail Development</b>	Encourage larger retail development, not to adversely impact on the vitality and viability of established shopping areas within the centre or any other existing centre. Indicative increase in retail floorspace to 2017 - 8,000 sq m net.	Maintain and reinforce retailing which should be concentrated around the main shopping area, and should be of an appropriate scale not to adversely impact on the vitality and viability of established shopping areas within the centre or any other existing centre. Indicative increase in retail floorspace to 2017 - Twickenham - 400 sq m net Teddington - 300 sq m net East Sheen - 1,500 sq m net Whitton - 600 sq m net	Local shops to be located within, or well-related to designated shopping frontages and be appropriate for the size and function of the centre in order not to have an adverse effect within the centre or on other neighbouring centres
<b>Visitor and Tourism Facilities</b>	Support provision for visitors including hotels.	<u>Twickenham</u> : Support provision for visitors including hotels <u>Others</u> : Small scale provision may be appropriate	Small scale provision may be appropriate
<b>Leisure, Arts and Culture</b>	Encourage strategic provision	Encourage provision appropriate to role & function of the centre	Encourage local facilities

D. The Council will seek to improve provision to help serve those areas most deficient in local shopping shown on the table below:

Areas more than 400m from local shopping facilities	Centres with an important role in meeting local need
south and west of East Sheen district centre	Friars Stile Road, Richmond

west of Castelnau	Castelnau (including nearby Tesco Express)
parts of Ham & Petersham	centres in Ham & Petersham
north of Hampton Wick/ east and west of Kingston Road	Kingston Road, & Hampton Wick Teddington
east of Strawberry Vale (although served in part by an isolated store)	
west of Hampton Hill & around the catchment area of Hampton Nursery Lands generally	Hampton Nursery Lands (J Sainsbury neighbourhood store)
around the periphery of Whitton district centre's 400 metre buffer particularly east and south including to the south west of Heathside centre, Powder Mill Lane.	Powder Mill Lane & Kneller Road, Whitton Hospital Bridge Road, Twickenham

### Existing Policy DM TC 1 - Larger Town Centres

To maintain and improve the town centres, the Council will require appropriate development to take place within the identified Town Centre Boundaries of the five main town centres. These are Richmond, the major centre, and the four district centres – Twickenham, East Sheen, Teddington and Whitton.

Proposals that contribute towards a suitable mix of uses will be approved, provided that they are appropriate to the function, character and scale of the centre. Acceptable town centre uses could include retail (if within or well related to designated frontages), business, leisure, tourism, community uses, health and residential development compatible with other development in the town centre.

Proposals will be acceptable within the Town Centre Boundaries if they:

- (a) Contribute towards meeting the future needs of the centres as identified in Core Policy 8 of the Core Strategy and so contribute to a mix that enhances the vibrancy and vitality of the centre.
- (b) Make more efficient use of land than previous development or bring about other benefits.
- (c) Reduce the need for travel, by providing accessibly located provision of goods and services and places of work, in units appropriate for the size of the centre, and do not add disproportionately to pressure on parking.
- (d) Are of a scale that enhances the vibrancy and vitality of the centre and do not erode the core function of the centre, or another neighbouring centre or compromise an existing use. This will apply to all proposed uses, including supermarkets.
- (e) Include where appropriate, units of a size suitable for modern retail needs (particularly in Richmond, where there is an identified shortage of retail units with larger floor-plates) whilst retaining sufficient traditional smaller units that add to local character and often house local businesses.
- (f) Maintain or enhance the amount of active frontage, subject to Retail Frontages.
- (g) Develop the range of leisure, cultural and tourism facilities.
- (h) Respect and enhance the heritage, character and local distinctiveness of the centre.

### **Existing Policy DM TC 2 - Local and Neighbourhood Centres and Areas of Mixed Use**

The Council will protect and improve the provision of day-to-day goods and services in the local and neighbourhood centres of the borough (See Policy DM TC 3 'Retail Frontages'). These centres are often designated as Areas of Mixed Use and are thus seen as appropriate for a mix of uses that meet primarily local needs.

Proposals for development will be acceptable in the smaller centres if they:

- (a) Provide appropriate mixes of uses, or mixed-use schemes. Appropriate uses could be: new retail, business or employment developments, which should maintain suitable provision for small businesses and other uses which serve the community or attract visitors. Residential development could also be appropriate. See Core Policy 8 of the Core Strategy for appropriate levels of provision.
- (b) Are of a scale that enhances the vibrancy and vitality of the centre and do not erode the core function of the centre, or another neighbouring centre or compromise an existing use. This will apply to all proposed uses, including supermarkets.
- (c) Respect and enhance the heritage, character and local distinctiveness of the centre, whilst making the most efficient use of land.
- (d) Include overall improvements and enhancements of the small centres; or modernise outmoded premises. Development should improve and maintain commercial provision in the smaller centres, without significantly expanding it.
- (e) Locate retail in designated shopping frontages, or in a location well-related to them, and/or within an area of mixed use.

(f) Do not add disproportionately to pressure on parking.

By supporting proposals that meet these criteria, the Council will ensure that the smaller town centres are self-supporting and reinforce themselves and the local community.

### New Policy LP 25

#### Development in Centres

A. Development in the borough's centres, as defined in the centre hierarchy, will be acceptable if it:

1. is in keeping with the centre's role and function within the hierarchy and is of a scale appropriate to the size of the centre (also see the Spatial Strategy of this Plan); and
2. is in an appropriate location, as follows:
  - a. A1 uses should be located within, adjacent to or well-related (or capable of being made so) to designated shopping frontages.
  - b. For other appropriate uses (see B & C below), major development and/or developments which generate high levels of trips should be located within a Main Centre Boundary. Elsewhere development should be located within the defined Area of Mixed Use (AMU boundary). For centres, or parts of centres where no boundary exists, proposals should be well-related to designated shopping frontages.

Proposals not in the above locations, including extensions to existing retail and leisure developments of more than 200sqm gross, should satisfy the Sequential Test as set out in national policy and guidance. Out of centre retail development is not considered appropriate in line with the London Plan; and

3. does not adversely impact on the vitality and viability of the centre in which the development is proposed, or another centre. When assessing proposals for development outside of existing centres, applicants will have to comply with the requirements of national policy and guidance in relation to impact assessments. For retail developments, including extensions of over 500sqm gross, the Council will require a Retail Impact Assessment. The scope of such assessments will need to be agreed with the Council before submitting a planning application; and
4. optimises the potential of sites by contributing towards a suitable mix of uses that enhance the vitality and viability of the centre. Commercial or community uses should be provided on the ground floor fronting the street, subject to other Local Plan policies, including the retail frontages policy LP 26.

B. In addition to A above, the following applies to development proposals in the borough's five main centres:

1. The Council will support appropriate development<sup>(3)</sup> in the five main centres.
2. The Council will encourage proposals for leisure, cultural and tourism facilities which contribute to the diversity of the offer.

<sup>3</sup> Types of development appropriate in the five main centres comprise retail development (including warehouse clubs, factory outlet centres and markets); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

3. Proposals for A1 uses should include, where appropriate, units of a size suitable for modern retail needs (particularly in Richmond centre, where there is a shortage of retail units with larger floor-plates) whilst retaining sufficient traditional smaller units that add to the local character and which are important to local businesses.

C. In addition to A above, in the local and neighbourhood centres as well as parades of local importance, the following applies:

1. Appropriate uses could include new retail (including markets), business or employment developments, which maintain suitable provision for small businesses, and other uses, which primarily serve the needs of the local community or attract visitors and develop cultural opportunities.

2. Development should, wherever possible, include overall improvements and enhancements of the small centres where appropriate, and/or modernise outdated premises.

## The centre hierarchy

7.1.1 The following table sets out the borough's centre hierarchy:

Type of Centre	Name of Centre	Delineated by
Main centres (4)	<ul style="list-style-type: none"> <li>Richmond</li> <li>Twickenham</li> <li>Teddington</li> <li>East Sheen</li> <li>Whitton</li> </ul>	Main Centre Boundaries

Local centres	<ul style="list-style-type: none"> <li>Barnes (High Street &amp; Church Road)</li> <li>East Twickenham</li> <li>Hampton Hill</li> <li>Hampton Village</li> <li>Ham Common (Parade)</li> <li>Kew Gardens</li> <li>St Margarets</li> </ul>	Area of Mixed Use Boundary (5)
Neighbourhood centres	<ul style="list-style-type: none"> <li>Castelnau</li> <li>Friars Stile Road</li> <li>Hampton Wick</li> <li>Heathside (Powder Mill Lane)</li> <li>Sheen Road</li> <li>Kingston Road (Teddington)</li> <li>Stanley Road (Teddington)</li> <li>White Hart Lane (Barnes/Mortlake)</li> </ul>	Area of Mixed Use Boundary (6)
Parades of local importance	<ul style="list-style-type: none"> <li>Ashburnham Road</li> <li>Fulwell</li> <li>Ham Street/Back Lane</li> <li>Hampton Nursery Lands</li> <li>Hospital Bridge Road</li> <li>Kew Green</li> <li>Kew Road</li> <li>Lower Mortlake Road</li> <li>Nelson Road</li> <li>St Margarets Road (parade to the north of A316)</li> <li>Sandycombe Road (Kew)</li> <li>Strawberry Hill</li> <li>Twickenham Green</li> <li>Waldegrave Road</li> <li>Whitton Road</li> </ul>	Area of Mixed Use Boundary (7)

4 Richmond is classified as a 'major centre' and the remaining 4 main centres are classified as 'district centres' in the London Plan's town centre network.

5 There are a small number of centres which do not have an AMU boundary. In these locations proposals are expected to be located within or near to designated shopping frontages where the majority of commercial development is located.

6 There are a small number of centres which do not have an AMU boundary. In these locations proposals are expected to be located within or near to designated shopping frontages where the majority of commercial development is located.

7 There are a small number of centres which do not have an AMU boundary. In these locations proposals are expected to be located within or near to designated shopping frontages where the majority of commercial development is located.



#### The five main centres

**7.1.2** The borough's five main centres comprising the principal centre of Richmond and the four district centres of Twickenham, Teddington, East Sheen and Whitton make up the first tier of the borough's centre hierarchy. They have an important role to play, providing shops, services, employment opportunities, housing and being a focus for community and cultural life.

**7.1.3** The policy develops the approach set out in the overall Spatial Strategy of this Plan by steering major development into the five main centres. Richmond main centre in particular is where the majority of commercial development is expected to be focused.

**7.1.4** The borough is characterised by some of the lowest population densities in London, which adds to the attractiveness of the borough whilst increasing development pressures. Focusing development in the main centres will result in sustainability benefits, including a reduction in the need to travel by car and also mitigate the effects of the increasing development pressure on the rest of the borough. Therefore, major commercial development should be located within the defined Main Centre Boundaries (with the exception of retail uses which must be in, adjacent or well-related to designated frontages).

**7.1.5** There have been significant structural changes to the retail sector in recent years, particularly in the growth in popularity of internet shopping, which have put pressure on the borough's high streets. However, research into the health of centres, including vacancy rates, suggests that the borough's main centres continue to perform well. In this context, the Retail Study published in 2014 estimates that a modest increase in retail floorspace will be needed by 2024. The projections suggest there is scope for about 4,000sqm gross of convenience goods floorspace (Use Class A1), 11,500sqm gross of comparison goods floorspace (Use Class A1) and 6,500sqm gross of Class A3/A4/A5 floorspace. Some of this need could be met by the re-occupation of existing vacant units in some centres. However, it is unlikely that vacant shops can accommodate more than a

quarter of the additional capacity needed and hence the Local Plan includes site allocations to meet the remainder of the forecast increase in floorspace needed.

**7.1.6** To retain and develop the vibrancy and vitality of the borough's centres, they should have an appropriate range of shops and services. This should be at a level appropriate to the centre, and not of a kind that would damage the ability of the surrounding area, or other centres, to function.

**7.1.7** The table below sets out the vision and approach for the main centres in the borough:

Name of main centre	Vision and approach
Richmond	<ul style="list-style-type: none"> <li>Richmond main centre is defined as a 'major' centre in the London Plan's network of town centres.</li> <li>Richmond main centre is the most accessible centre by public transport and is therefore the most appropriate location for major new commercial development which attracts both local people and those who live outside the borough. This major centre is expected to accommodate much of the borough's forecast retail floorspace. The Spatial Strategy recognises that the centre should be reinforced to an extent compatible with environmental constraints, including recognising the many Listed Buildings and Conservation Areas in the core of the centre.</li> <li>The Richmond and Richmond Hill Village Planning Guidance SPD was adopted in June 2016. It sets out the vision for the area which includes: <ul style="list-style-type: none"> <li>that Richmond will continue to be a thriving major centre with convenience and specialist shops, employment, leisure and tourism, cultural and social facilities;</li> <li>the need to maintain and improve shop fronts and signage; and</li> <li>the growth of the evening economy will need to be carefully managed to ensure the amenity of residents is maintained and the possibility of gaining Purple Flag status is to be explored.</li> </ul> </li> </ul> <p>In addition:</p> <ul style="list-style-type: none"> <li>The Council encourages new office development, particularly within the designated Key Office Areas.</li> <li>The Council supports businesses and retailers, including through the proposed Business Improvement District.</li> </ul>

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	<ul style="list-style-type: none"> <li>Richmond main centre is suitable for higher density residential development comprising small units; car free development may be appropriate in areas with a PTAL of 5 or 6.</li> <li>The London Plan identifies Richmond as a potential Outer London Development Centre for leisure/tourism/arts/culture/ sports and notes the special strengths of Richmond centre, including the potential to generate significant growth as a centre of greater than sub-regional importance in the area of leisure and tourism.</li> <li>The London Plan defines Richmond as providing a cluster of night time activities of sub-regional importance. It should be noted that the Council's Licensing Policy includes a designated Cumulative Impact Zone in Richmond centre to ensure that increases in such uses do not adversely impact on the amenities of local residents.</li> </ul>
Twickenham	<ul style="list-style-type: none"> <li>Twickenham is defined as a 'district' centre in the London Plan's network of town centres.</li> <li>Twickenham is highly accessible by public transport and thus suitable for new major commercial development, which attract both local people and people who live outside the borough.</li> <li>The Twickenham Area Action Plan (AAP) was adopted in 2013 and sets out the framework for developing the centre, including site specific proposals. The AAP is based on five key themes: <ul style="list-style-type: none"> <li>revitalising the high street, including improvements to the retail, food and beverage offer of the centre, making the most of the presence of the rugby spectator;</li> <li>enhancing the leisure, entertainment and cultural offer, including improving the range and quality of attractions, to attract people into the centre;</li> <li>making the centre a more inviting place at all times of the day and evening for people of all ages;</li> <li>improving the public realm, reducing the impact of traffic and creating an attractive and safe place to visit and enjoy; and</li> <li>protecting, enhancing and making the most of the character of the centre's built and open environment, including the riverside and working waterfront.</li> </ul> </li> </ul> <p>In addition:</p> <ul style="list-style-type: none"> <li>The Council encourages new office development, particularly within the designated Key Office Areas.</li> <li>The Council supports Twickenham's Business Improvement District, which was set up in early 2014 to support businesses.</li> <li>The London Plan identifies Twickenham as a 'night time economy cluster of more than local importance'. It should be noted that the Council's Licensing Policy includes a designated Cumulative Impact Zone in</li> </ul>

	Twickenham centre to ensure that increases in such uses do not adversely impact on the amenities of local residents.
Teddington	<ul style="list-style-type: none"> <li>Teddington is defined as a 'district' centre in the London Plan's network of town centres.</li> <li>Teddington is less accessible by public transport in comparison to Richmond and Twickenham; therefore, the centre is more suited to providing shops, services and employment opportunities for local communities.</li> <li>The Spatial Strategy sets out the need to maintain and enhance, rather than significantly expand, Teddington centre.</li> <li>The Council seeks to maintain, and where appropriate enhance, Teddington's role in providing office space for businesses. New office development is particularly encouraged in the designated Key Office Areas.</li> <li>Teddington has a well-established restaurant sector. The Spatial Strategy supports establishments that serve local needs and communities.</li> <li>Village Planning Guidance SPD is being developed for Teddington, which will further define the vision for the centre, including locally specific guidance on design and appearance for developments.</li> </ul>
East Sheen	<ul style="list-style-type: none"> <li>East Sheen is defined as a 'district' centre in the London Plan's network of town centres.</li> <li>East Sheen is less accessible by public transport in comparison to Richmond and Twickenham; therefore, the centre is more suited to providing shops, services and employment opportunities for local communities.</li> <li>The East Sheen Village Planning Guidance SPD was adopted in January 2016. The vision for East Sheen includes to: <ul style="list-style-type: none"> <li>retain the established character of the area;</li> <li>improve the convenience of the shopping centre for the community including through its range of uses;</li> <li>manage the impacts of the Upper Richmond Road West on the environment and its users wherever possible;</li> <li>create a 'centre' for the village at Milestone Green;</li> <li>utilise pavements to improve and enliven the streetscene in parts of the Upper Richmond Road West; and</li> <li>improve Mortlake Station.</li> </ul> </li> </ul> <p>In addition:</p> <ul style="list-style-type: none"> <li>The Spatial Strategy sets out the need to maintain and enhance, rather than significantly expand, East Sheen centre.</li> <li>The Council seeks to maintain, and where appropriate enhance, East Sheen's role in providing office space for businesses. New office</li> </ul>

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	<p>development is particularly encouraged in the designated Key Office Areas.</p> <ul style="list-style-type: none"> <li>The Spatial Strategy supports establishments, such as drinking establishments, that serve local needs and communities.</li> </ul>
Whitton	<ul style="list-style-type: none"> <li>Whitton is defined as a 'district' centre in the London Plan's network of town centres.</li> <li>Whitton is less accessible by public transport in comparison to Richmond and Twickenham; therefore, the centre is more suited to providing shops, services and employment opportunities for local communities as well as recognising the role the centre plays for visitors to Twickenham Stadium.</li> <li>The Whitton and Heathfield Village Planning Guidance SPD was adopted in July 2014. The vision for the area includes to: <ul style="list-style-type: none"> <li>retain and reinforce the established character of the area; and</li> <li>maintain, and where appropriate enhance, shopping and services, including supporting an improved evening offer.</li> </ul> </li> </ul> <p>In addition:</p> <ul style="list-style-type: none"> <li>The Spatial Strategy sets out the need to maintain and enhance, rather than significantly expand, Whitton centre.</li> <li>The Council seeks to maintain, and where appropriate improve, the range and choice of shopping in the centre.</li> </ul>

**7.1.8** The majority of the borough's main centres fall within London's Arcadia Strategic Cultural Area (as set out in the London Plan). The Council's Cultural Partnership Strategy 2015-2019 provides a framework for developing the arts, culture and sport until 2019, aiming to increase participation and develop services with a community focus.

### Local and neighbourhood centres and parades of local importance

**7.1.9** Local and neighbourhood centres as well as parades of local importance provide a focus for local communities and opportunities to meet, shop, work and spend leisure time. The successful function of the smaller centres of the borough is of special importance as the benefits for residents and local communities are significant; they are both quantifiable but can also be more intangible. A successful local centre provides goods and services that result in a reduced need to travel. It also supports local

business, which in turn benefits the wider community. Local centres in particular can create or foster a sense of community and inclusiveness that adds to the cohesiveness of the surrounding community.

**7.1.10** The size and function of these centres vary considerably, ranging from larger local centres, such as Barnes and Hampton Hill with a good range of food and comparison shops, independent and specialist shops, community and cultural facilities, through to parades with a small number of shops meeting very local but valued needs.

**7.1.11** The size of a proposed development should reflect the size and function of the relevant centre (as set out in the table above). For example, a large retail store should not be added to a small parade so that it effectively operates as a stand-alone store. Larger centres (often local centres in the hierarchy) will have a diverse role, in some cases significant leisure offers and have, or are developing, niche roles. Such centres should be able to develop their tourism potential or specialist shopping offer. The Council will seek to support businesses that are successful and expanding.

### Village Planning Guidance SPDs for villages

**7.1.12** The Council is currently developing Village Planning Guidance SPDs for village areas across the borough. The SPDs provide guidance on design and local character to support the overall vision for the village area, which will assist in shaping the direction of the local and neighbourhood centres as well as local parades in the borough.

**7.1.13** The table below sets out the vision and approach for the local centres, parades and AMUs:

Village Plan SPD	Centres covered by Village Plan area	Village Plan vision & approach for Village Plan area
Barnes	Barnes local centre (Barnes High Street and Church Road)	<ul style="list-style-type: none"> <li>maintain and enhance the character of Barnes as an attractive residential area and as a place that people want to visit;</li> <li>ensure that Barnes High Street, Church Road and White Hart Lane continue to provide a range of</li> </ul>

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	<p>Castelnau neighbourhood centre</p> <p>White Hart Lane neighbourhood centre (Barnes/Mortlake)</p>	<ul style="list-style-type: none"> <li>shops and services for residents and visitors within an attractive setting;</li> <li>improve Castelnau shopping area so it provides a more welcoming environment for shoppers and in its role as an important gateway into both Barnes and the borough;</li> <li>encourage improvements to facilities for younger and older residents;</li> <li>improvements to areas including the High Street, the river frontage, river wall and towpath; and</li> <li>reduce the impact of traffic and improve facilities for pedestrians and cyclists, strengthen public transport connections, particularly where they strengthen links and connectivity between different parts of the village.</li> </ul>
Kew	<p>Kew Gardens local centre</p> <p>Kew Green local parade</p> <p>Sandycombe Road local parade</p>	<ul style="list-style-type: none"> <li>maintain the character of Kew as an attractive residential area with enhancement of community facilities;</li> <li>ensure Kew Gardens shopping parade continues to thrive and provide a shopping and service centre for residents and visitors; and</li> <li>Kew Green and Sandycombe Road to continue to provide local shops and services.</li> </ul>
Mortlake	Mortlake Area of Mixed Use	<ul style="list-style-type: none"> <li>the vision for Mortlake is based on the redevelopment of the Stag Brewery;</li> <li>provide improved links to East Sheen centre; and</li> <li>seek an appropriate mix of uses to generate vibrancy and local employment as well as leisure opportunities, including restaurants, cafés, community uses, a museum, boat houses and lower cost units suitable for small businesses.</li> </ul>
Whitton and Heathfield	<p>Heathside (Powder Mill Lane/ Hanworth Road) neighbourhood centre</p> <p>Nelson Road parade of local importance</p>	<ul style="list-style-type: none"> <li>improve Powder Mill Lane shopping parade, which should continue to serve day to day needs.</li> </ul>

Richmond and Richmond Hill	<p>Sheen Road neighbourhood centre</p> <p>Friars Stile Road neighbourhood centre</p> <p>Lower Mortlake Road parade of local importance</p> <p>Kew Road parade of local importance</p>	<ul style="list-style-type: none"> <li>centres to provide for the day to day needs of local residents, with an increase in specialist shops to attract visitors;</li> <li>maintain and improve the quality of shopfronts and signage in Friars Stile Road and Kew Road; and</li> <li>in Sheen Road local centre: <ul style="list-style-type: none"> <li>mitigate the impact of traffic and improve highways conditions and pedestrian convenience, and rationalise existing signage and street furniture; and</li> <li>improve shopping frontages by encouraging consistency and a return to original signage designs.</li> </ul> </li> </ul>
East Twickenham	East Twickenham local centre	<ul style="list-style-type: none"> <li>maintain the character of the area as an attractive residential area;</li> <li>ensure the centre continues to provide a range of shops and services for residents and visitors;</li> <li>retention of Twickenham Studios;</li> <li>redevelopment of Ryde House for education and retail;</li> <li>seek environmental and highway improvements to provide local distinctiveness along Richmond Road including renewal of paving; and</li> <li>reduce the impact of traffic and manage parking to allow residents access to local facilities.</li> </ul>
St Margarets	<p>St Margarets local centre</p> <p>Crown Road local parade (part)</p> <p>St Margarets Road parade of local importance (parade north of the A316)</p>	<ul style="list-style-type: none"> <li>maintain the character of the area as an attractive residential area;</li> <li>ensure St Margarets centre continues to provide a range of shops and services for residents and visitors, protect and enhance local shopping in the local parades on St Margarets Road (north of the A316) and Crown Road;</li> <li>improve streetscape including the area outside of Twickenham Studios; and</li> <li>opportunities to improve the appearance and accessibility of St Margarets Station.</li> </ul>

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**7.1.14** Local and neighbourhood centres as well as parades are particularly important for households without a car. It is important to continue to protect the latter in line with the Council's aim of providing local shopping opportunities within 400 metres of most people's homes.

**7.1.15** The Retail Study 2014 indicates that there is need to provide an estimated 4,250sqm (gross) of Use Class A3/A4/A5 floorspace by 2024 in total outside of the five main centres. Of this figure approximately 1,100sqm (gross) is convenience, and 2,100sqm (gross) comparison retail floorspace. Site allocations, as set out within this Plan, include retail relevant to this level of the hierarchy, to meet this need. However, should development opportunities arise, new retail developments which are in line with this policy in terms of scale, location and impact may help to support these centres.

#### **Areas of Mixed Use**

**7.1.16** The Area of Mixed Use boundary delineates the smaller centres and parades in the hierarchy. There are a small number of centres which do not have such a boundary. In these locations proposals are expected to be located within or near to designated shopping frontages where the majority of commercial development is located.

**7.1.17** There are a small number of AMUs which are not in the centre hierarchy as their retail function is limited. These are Mortlake, Thames Street (Hampton), Hampton Road (Twickenham) and Crown Road (St Margarets) AMUs. For these centres parts A and C of this policy will apply.

#### **Sequential Tests & Impact Assessments**

**7.1.18** National policy and guidance sets out the approach to assessing planning applications when impact and sequential testing is required, drawing out specific requirements for retail and leisure and providing advice on evidence needed.

**7.1.19** Impact assessments and sequential tests will need to be proportionate to the scale of the development proposed. Applicants are required to undertake a Retail Impact Assessment in line with the thresholds set out in this policy, which reflect the type of generally small scale retail applications that come forward in this borough.

#### **The size of retail units and use of conditions**

**7.1.20** The size of units is also important; new developments in some centres (particularly Richmond) may include provision for larger retail units. However, smaller units which can enhance a centre's sense of identity and attractiveness, should be retained.

**7.1.21** Conditions may be applied where necessary to restrict the size of units, or to subdivide shop fronts to reflect the bay widths in the parade, in line with the Council's SPDs on Shopfronts as well as the Village Planning Guidance SPDs.

#### **Permitted Development Rights**

**7.1.22** Several changes to Permitted Development Rights affecting change of use to and from retail have been introduced in recent years. Where prior approval is needed, the Council will interpret key shopping areas referred to in the General Permitted Development Order 2015 as being designated key and secondary shopping frontages.

#### **Residential development in centres**

**7.1.23** Whilst residential uses can contribute to the overall vitality of a centre, housing on the ground floor contributes less to vitality than most commercial or community uses. Therefore, commercial or community uses will be expected to front the street. Where a proposal is in a designated shopping frontage, policy LP 26 in 7.2 'Retail Frontages' will apply. There is a growing trend to convert the rear of premises to residential use. Where conversion is acceptable, the access to any residential unit should be from the front rather than the rear where practicable.



**7.1.24** Residential development contributes to the overall health of centres and to meeting the Borough's housing target. There is scope to increase housing stock in the centres, such as through increased densities or introducing housing in upper floors, provided that this does not lead to an unacceptable loss of commercial or community space, and that the commercial or community uses on the ground floor remain of a viable size.

### **Optimising the use of land**

**7.1.25** Development should optimise the use of buildings and/or land. This could be achieved by implementing an appropriate density or by ensuring that space above ground floor level is well used. Also, it may be possible for mixed use schemes to achieve this through measures such as shared parking, refuse facilities and servicing, amongst other things. The design and layout as well as amenity are important considerations when proposing a mix of uses.

## **7.2 Retail Frontages**

### **Why we are reviewing this policy area**

This policy is critical for managing the balance of uses in centres and ensuring that there is adequate retail floorspace available. It is a long-standing policy approach which designates parts of centres as key and secondary shopping frontages and governs changes of use both within and outside them. This approach is endorsed in the NPPF. This policy is similar to the existing adopted policy. Revisions include clarifying that the policy relating to over-concentrations of particular land uses applies to all frontages and making marketing requirements explicit in policy.

### **What the evidence says**

Consultants Nathaniel Lichfield and Partners were commissioned by the Council to produce a retail study published in 2014, which forecast a modest need for floorspace for retail (Use Class A1) and the food and drink sector (Use Classes A3, A4 and A5). Therefore, there is a continued need to protect retail floorspace in the borough. However, it is recognised that other complementary uses are also of importance in supporting attractive and distinct centres.

Town centre health checks were published by the Council in 2013 (updated for these larger centres in the NLP Retail Study). The Council also surveys ground floor occupiers in all centres annually from which vacancy rates are derived. The data suggest that most centres in the borough are generally healthy with vacancy rates below the national average. This research also supports a policy approach of protecting an appropriate level of retail floorspace.

In addition, research into access to local food shopping has been published. It concluded that there is generally a good spread of food shopping across the borough. Some of this essentially top-up shopping provision is located in small centres and local parades and are both vital to and valued by local residents and should be supported by this policy.

Evidence has also been updated to support the approach of restricting certain land uses in specific areas.

An Article 4 Direction was made in March 2016 to remove the permitted development rights for change of use from shops (Use Class A1) to financial and professional services (Use Class A2). This will come into effect on 1 April 2017.

### Existing Policy DM TC 3 - Retail Frontages

The Council will act to protect the existing retail areas of the town centres by controlling changes of use from retail. The Council has designated parts of centres as Key Shopping Frontage or Secondary Shopping Frontage. These frontages can be viewed on the Proposals Map and in Appendix Three - List of Key and Secondary Shopping Frontages.

A. Key Shopping Frontages. Proposals that result in a loss of retail space in key shopping frontages will be generally resisted. The Council will support other uses converting to retail, subject to there being no adverse impact on the centre, and seek to retain key facilities, including Post Offices.

B. Secondary Shopping Frontages. Non-retail proposals will be acceptable in the secondary shopping frontages only if:

(a) The proposed new use meets community needs (dentist, clinic or health centre, veterinary surgery, gym, fitness studio, facilities which would enable the public better access to police services, or other community use directly serving the public (often D1 uses), or is a financial or professional service, café, restaurant, drinking establishment or takeaway (A2-A5 uses) and;

(b) The proposed use retains a “shop-like” appearance with an active frontage and will not have a detrimental visual impact on the shop-front and respect the heritage and character of the centre.

(c) They will not create an unbroken run of three or more non-shop units.

(d) They are complementary to the shopping function and provide a direct service to the public.

(e) They will not result in an over-concentration of such uses in the area.

(f) They will not detract from residential amenity, or unacceptably add to traffic and parking problems in the area.

### C. Shops selling essential goods\*/Post Offices

In designated frontages in smaller centres and local parades, changes of use from shops selling (or whose last occupant sold) essential goods\* to other non-A1 uses will be generally resisted if there is no similar alternative within 400 metres. This applies even if the proposal is acceptable in terms of criteria (a) to (f) above.

\*See Supporting Text for definition

### D. Frontages/areas subject to specific restrictions:

There are areas of the borough where certain changes of use will no longer be allowed due to existing concentrations. These include, but are not limited to:

Class to be restricted*	Location of zone
A3 and A4	112-196 (Even) High Street, Teddington
A3	90 - 112 (Even) Kew Road, Richmond
A3	27 - 32 (Consecutive) The Quadrant, Richmond
A3 and A4	Richmond Riverside -Thameside, south from Richmond Bridge as far as Buccleugh Gardens.
A4 and A5	1 - 59 (Odd) and 2-40 (Even) York Street, Twickenham
A4 and A5	1 - 65 (Odd) and 2-50 (Even) London Road, Twickenham
A5	148 - 182 (Even) 191 - 213 (Odd) Upper Richmond Road West, East Sheen

\* Restaurants and cafes (A3), Drinking establishments (A4), Hot food take aways (A5)

These areas will be kept under review, looking at other changes of use that have occurred.

E. Changes of use in non-designated frontages where policy DM TC 4 does not apply

The Council will generally consider favourably applications for change of use to any non-shop use compatible with the retail function of the centre.

## New Policy LP 26

### Retail Frontages

The Council has designated parts of centres as Key Shopping Frontage or Secondary Shopping Frontage. These frontages are identified on the Proposals Map and the relevant addresses listed in Appendix 4.

#### Key Shopping Frontages

A. Proposals that result in a loss of floorspace in Use Class A1 in Key Shopping Frontages will be resisted. Other uses converting to retail will be supported, subject to there being no adverse impact on the centre. The Council will seek to retain key facilities including Post Offices.

#### Secondary Shopping Frontages

B. A non-A1 proposal will be acceptable in the secondary shopping frontages only if it:

1. (a) meets community needs (such as a dentist, clinic or health centre, veterinary surgery, gym, fitness studio and facilities which would enable the public better access to police services) and provides a direct service to the public, or
- (b) falls within Use Classes A2 to A5,

In addition to (a) or (b) above, the proposal must meet the following criteria:

2. the proposed use should retain a 'shop-like' appearance; it should not have a detrimental visual impact on the shopfront and should respect the heritage and character of the centre, taking into account the Village Planning Guidance SPDs;
3. the proposed use has to be complementary to the area's shopping function and provide a direct service to the public; and
4. it will not create an unbroken run of three or more non-A1 units.

#### Over-concentration of uses and impact on amenity

C. The Council will resist proposals that result in an over-concentration of similar uses (such as betting shops, estate agents, restaurants and take-aways) in any one area and/or would result in an adverse impact on the amenity of nearby users as well as surrounding residential areas, including a cumulative adverse effect.

D. There are areas of the borough where certain changes of use will no longer be allowed due to existing concentrations. These include, but are not limited to, the following frontages and/or areas subject to specific restrictions:

Use Class to be restricted <sup>(8)</sup>	Frontage or area subject to specific restrictions
A3 and A4	112-196 (Even) High Street, Teddington
A3	90 - 112 (Even) Kew Road, Richmond
A3	27 - 32 (Consecutive) The Quadrant, Richmond
A3 and A4	Richmond Riverside - Thameside, south from Richmond Bridge as far as Buccleugh Gardens.
A4 and A5	1 - 59 (Odd) and 2-40 (Even) York Street, Twickenham
A4 and A5	1 - 65 (Odd) and 2-50 (Even) London Road, Twickenham
A5	148 - 182 (Even) 191 - 213 (Odd) Upper Richmond Road West, East Sheen

The above areas will be kept under review. Proposals for mixed A1/A3 uses within the above areas will be assessed on a case by case basis.

### Shops selling essential goods<sup>(9)</sup>/Post Offices

E. In secondary shopping frontages in smaller centres including local parades, changes of use from shops selling (or whose last occupant sold) essential goods to non-A1 uses will be resisted if there is no similar alternative within 400 metres. This applies even if the proposal is acceptable in terms of criteria B & C above.

### Changes of use in non-designated frontages where policy LP 27 does not apply

F. The Council will consider favourably applications for change of use to any non-A1 use which is a commercial or community use compatible with the retail function of the centre.

### Marketing requirement for changes of use

G. Where a proposal involves a change of use not supported by policy, the Council will require satisfactory evidence of full and proper marketing of the site for at least 2 years. The applicant will need to undertake marketing in line with the requirements set out in Appendix 5.

**7.2.1** This policy builds on the approach set out in the Spatial Strategy of maintaining, reinforcing and strengthening the borough's centres and parades. It assists in consolidating the borough's centres and helps define their function in the borough's hierarchy of centres and parades (as set out in policy LP 25 in 7.1 'Development in Centres'). The policy also sets out the locations where A1 uses are best located and it establishes which types of uses are acceptable in designated frontages. In doing this the policy also seeks to protect the existing A1 uses from inappropriate or insensitive development.

**7.2.2** Key Shopping Frontages are located in the most central areas, where retail already predominates. Secondary Shopping Frontages are usually adjacent to them in less core positions. They support the Key Shopping Frontages and are also areas where some degree of diversification should be permitted to provide and support choice and variety, whilst still retaining their primarily retail function.

**7.2.3** Key and secondary shopping frontages work in tandem with each other to ensure that there is a good balance of uses in centres and that there is sufficient shopping floorspace available to meet identified needs as set out in the Council's Retail Study. Shopping frontages also prevent

<sup>8</sup> Restaurants and cafes (A3), Drinking establishments (A4), Hot food take aways (A5)  
<sup>9</sup> as defined in the supporting text

agglomerations of non-shop uses, which could result in areas with 'blank' frontages from forming where there may be less activity during the day, disruption to the retail continuity and reduction in the variety of uses.

### **Shopping frontages**

**7.2.4** The key frontages have been designated on the parades that form the core of the retail centre, and as such they are predominantly comprised of A1 retail uses. A compact retail core fosters comparison shopping and helps to maintain a critical mass of retailers. The loss of A1 space will be resisted and conversions to A1 generally supported.

**7.2.5** In Key Shopping Frontages there will be established non-A1 uses. A proposal for a change of use from an existing non-A1 use to another appropriate use will generally be acceptable, provided that the proposed use complies with Section B parts 1-3 and Section C of this policy.

**7.2.6** The secondary frontages have been designated in areas that, whilst not core, still play an important supporting role to the retail centre. They are mostly A1 retail. A level of diversification may be allowed or encouraged in some circumstances. Additionally, secondary frontages may be designated where diversification has already taken place. The designation would recognise the existing diversity but it would also prevent any further reduction in the area's retail function and character. In particular the 'unbroken run of three' rule prevents 'clumps' of non-A1 uses forming which may result in areas with blank frontages and potentially reduce the variety of shops and services.

**7.2.7** The list of uses suitable in secondary shopping frontages included in the policy is not exhaustive and other suitable uses may include B1 and Sui Generis uses, provided they meet the other criteria set out in this policy.

**7.2.8** This policy primarily protects the ground floor and street frontage part of a unit. It acknowledges that there may be scope to convert upper floors to other uses, provided that the commercial or community use on the ground floor remains of a viable size and that this does not lead to an unacceptable loss of commercial or community space in upper floors.

### **Over-concentration**

**7.2.9** The Council is concerned that there are areas in the borough where there are concentrations of similar uses, which have a negative effect on amenity and/or the vitality and function of a centre. This policy seeks to resist further concentrations and to prevent an intensification in areas identified as having an existing concentration (see the table on 'Use Class to be restricted' as set out in the policy above). This policy can apply to designated shopping frontages and also to areas outside of them. When assessing proposals, an appropriate area will be used, which reflects the size and scale of the proposed development. For larger centres this may be part of the centre only. The Council's Licensing policy may also be taken into account, in particular the Cumulative Impact Policy.

**7.2.10** In addition to the areas to subject to restrictions listed in the table on 'Use Class to be restricted' as set out in the policy above, the Council will not permit development of new fast food takeaways (A5 uses) located within 400 metres of the boundaries of a primary or secondary school. This is in order to restrict the availability of unhealthy foods to school-age children. Please refer to the map within policy LP 30 in 8.3 'Health and Wellbeing' for the extent of this restriction.

### **Shops selling essential goods / Post Offices**

**7.2.11** Section C of this policy applies to all tiers of the hierarchy as set out in policy LP 25 below main centre level. By giving additional protection to shops, which sell essential goods as well as Post Offices, the Council aims to ensure that residents have access to local food shopping and essential services. The Use Classes Order allows for change between retailers selling different goods. This policy gives greater control to protect local food shopping. It applies where a change of use is sought from a shop to a non-A1 use in a secondary shopping frontage, and the existing or last use of the shop was selling essential goods defined as - a general grocer, newsagent, green grocer, baker, butcher, fishmonger and chemist, or a Post Office.



#### **Changes of use in non-designated frontages where policy LP 27 does not apply**

**7.2.12** In areas not covered by designated frontages or by policy LP 27 in 7.3 'Local Shops, Services and Public Houses', vacant shop units can provide employment/business opportunities. This may help to provide premises for small businesses and start-ups, which are particularly important in this borough where the proportion of small businesses is high as are business creation rates.

**7.2.13** The Council will consider favourably applications for such uses where the buildings can be satisfactorily converted, the proposed use will not adversely affect the centre's retail function and appearance, or amenity, and there is sufficient off street parking where required. Examples are offices and small workshops, medical and veterinary surgeries, solicitors and insurance brokers.

**7.2.14** The Council acknowledges that permitted development rights allow the conversion to residential in some areas outside of designated shopping frontages without the need for planning permission.

#### **Marketing requirements**

**7.2.15** The borough needs to retain premises in commercial and community use in order to maintain and support centres, protect their vitality and to meet the need for additional retail floorspace. However, there is a need to prevent an unacceptable increase in vacant premises. Satisfactory marketing evidence, in the form of full and proper marketing should be provided in line with Appendix 5. This requirement will apply in designated and non-designated shopping frontages, and it applies to proposals which result in either the complete loss of a commercial or community use or where the loss is considered substantial and is of concern to the Council.

### **7.3 Local Shops, Services and Public Houses**

#### **Why we are reviewing this policy area**

This is a long-standing policy. There continues to be a need for a policy which protects isolated local shops and services which are essential for local residents. This policy also protects public houses which are valued community facilities. It clarifies that full and proper marketing evidence will be needed for proposals which would lead to the loss of pubs.

#### **What the evidence says**

Research into access to local food shopping has been published. It concluded that there is generally a good spread of food shopping across the borough. Some of this essentially top-up shopping provision is located in small centres and local parades and is both vital to and valued by local residents. However, it identified that there are some areas which are more than 400 metres from local food shops.

Pubs are valued community facilities. Each year there are new applications for change of uses from pubs to other uses, mostly residential use.

#### **Existing Policy DM TC 4 - Local Shops, Services and Public Houses**

The Council will support isolated shops, small groups of shops and public houses which serve local needs, and will seek to ensure that there is provision of essential daily goods within reasonable walking distance around the borough.

Changes of use away from retail will not be permitted unless:

- (a) The unit is within 400 metres of a designated frontage or
- (b) The retail use is inappropriate in terms of access or neighbourliness or
- (c) The proposed use would provide a community service or function.

B - New retail units to serve new housing should normally take place within existing designated shopping centres (see Policy DM TC 1 'Larger Town Centres' & Policy DM TC 2 'Local and Neighbourhood Centres and Areas of Mixed Use' ) but where there is no shopping centre within reasonable walking distance new shops may be required as part of a new housing development.

Changes of use from public houses will not be permitted unless

- (a) there is another public house within convenient walking distance or
- (b) The public house use is inappropriate in terms of access or neighbourliness or
- (c) The proposed new use would provide a community service or function.

## New Policy LP 27

### Local Shops, Services and Public Houses

#### Local Shops and Services

A. The Council seeks to protect local shops and services by the following means:

1. Change of use from premises falling within Use Classes A1 to A5 will not be permitted unless:

- a. The unit is within 400 metres of a designated shopping frontage; or
- b. the existing use is inappropriate in terms of access or amenity and living conditions; or
- c. the proposed use would provide a social or community service or function which outweighs the loss of the facility meeting evidence of a local need.

2. New retail units to serve new housing development should be provided within existing centres. Where there is no existing centre within reasonable walking distance (400 metres), a new shop or shops may be required as part of a new housing development.

3. The Council will require satisfactory evidence of full and proper marketing for a minimum of 2 years where a proposal does not meet the above criteria. The applicant will need to undertake marketing in line with the requirements set out in Appendix 5.

#### Public Houses

B. The Council will resist the loss of public houses. Before accepting the loss of any public house the Council requires satisfactory evidence of full and proper marketing normally for at least 2 years for a full range of appropriate uses (see policy LP 28 Social Infrastructure). The applicant will need to undertake marketing in line with the requirements set out in Appendix 5.

#### Local shops and services

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**7.3.1** This policy is designed to ensure that all residents have a shop and services within reasonable walking distance (defined as 400 metres). Shops and services are especially important to elderly or less mobile shoppers, those with young children, those without cars, and are also useful to all others for their top-up and emergency shopping.

**7.3.2** The Council recognises that long-term changes in shopping patterns have reduced the need for the number of shop units that would have been necessary in the past. However, the Council recognises that local shops remain essential to many residents. In addition, they serve an important community function and local top-up shopping is needed and valued. Where a proposal involves the loss of a local shop or service, satisfactory evidence of full and proper marketing in line with the requirements set out in Appendix 5 will be required.

**7.3.3** Also note that in line with policy LP 30 in 8.3 'Health and Wellbeing', the Council will not permit development of new fast food takeaways (A5 uses) located within 400 metres of the boundaries of a primary or secondary school.

#### **Public houses**

**7.3.4** Public houses play an important role and social function in the local community and they add to the local character of an area. Therefore, the Council will resist the loss of public houses. Any proposal that results in the loss of a pub has to firstly provide satisfactory marketing evidence to establish that the pub is not viable (in line with Appendix 5 of this Plan). The pub's potential to provide a community service or function should be included in any marketing exercise.

**7.3.5** When assessing a proposal for the change of use from a public house, the Council will take into account the following:

- whether there is another pub within 400 metres;

- whether the use is inappropriate in terms of access or amenity or living conditions; and
- whether the proposed new use would provide a social or community service or function which outweighs the loss of the facility, meeting evidence of a local need.

**7.3.6** This policy applies to public houses and not the A4 use class in its entirety. The criteria of policy LP 28 in 8.1 'Social and Community Infrastructure' will be applied when assessing the loss of a pub.

**7.3.7** Applicants should also have regard to the [Campaign for Real Ale's \(CAMRA\) Public House Viability Test](#).

# Community Facilities 8

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### 8 Community Facilities

#### 8.1 Social and Community Infrastructure

##### Why we are reviewing this policy area

The policies relating to social infrastructure are considered to be in line with national and regional policies. Minor updates to the wording are required and the policy approach could be strengthened. In particular, the policy could more accurately reflect local needs and shortages of specific community facilities and encourage greater provision of community infrastructure in recognition of the important role that these facilities play in maintaining successful, healthy and happy communities. Opportunities for greater integration of facilities in multi-use buildings should also be explored.

##### What the evidence says

Evidence from service providers indicates that there is an increasing need for schools and nurseries across the borough and that there is also pressure on health facilities.

The Council's School Place Planning Strategy provides evidence that more school places are required to meet longer-term forecast demand, particularly in the primary phase.

The pressure on nursery places is likely to be intensified by the Government's recent provision of 30 hours of free childcare for 3 and 4 year olds with working parents. It is very important that all existing community facilities are protected and that if a community use ceases on a particular site, every opportunity is taken to re-use that site for an alternative social or community infrastructure use.

##### Existing Policy CP16 - Local Services/Infrastructure

16.A The overall strategic approach is to ensure the provision of services and facilities for the community.

16.B The Council in working with other partners will ensure the adequate provision of such services and facilities, especially in areas of relative deprivation. The Council will aim to facilitate co-location of council, health, library and school facilities where opportunities arise.

16.C Loss of community facilities will be resisted unless it can be shown that the facilities are no longer needed or that the service could be adequately re-provided in a different way or elsewhere.

16.D New developments will be expected to contribute to any additional infrastructure and community needs generated by the development. New development will also have to take account of the requirements set out in the Planning Obligations Strategy (Supplementary Guidance to the UDP). Obligations will be sought in accordance with Circular 05/05 and any superseding advice.

##### Existing Policy 10

##### Existing Policy DM SI 1 - Encouraging New Social Infrastructure Provision

Planning permission will be granted for new or extensions to existing social infrastructure where:

1. it provides for an identified need;
2. where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which encourage dual use and increase public access;



3. it is in a location that is accessible by public transport, walking and cycling;
4. is of high quality design providing inclusive access for all;
5. it does not have a significant adverse impact on residential character and amenity;
6. provision of car parking and effect on traffic movement and highway safety is in accordance with Off Street Parking - Retention and New Provision; and
7. is in accordance with other relevant policies.

Provision to meet local needs will be encouraged in areas of relative disadvantage which are identified in Core Policy 13.

### Existing Policy 11

#### Existing Policy DM SI 2 - Loss of Existing Social Infrastructure Provision

In accordance with the Core Strategy, the loss of social infrastructure will be resisted unless it can be shown that the facilities are no longer needed or that the service could be adequately re-provided in a different way or elsewhere in a convenient alternative location. Where a particular social infrastructure use ceases, the Council will encourage an alternative social infrastructure use. If no alternative social infrastructure uses are suitable, residential development will normally be required (unless there is an opportunity for mixed-use development), including affordable housing in accordance with Policy CP15 and other relevant policies.

In considering applications involving the loss of social infrastructure the following evidence will be required:

1. that the existing facilities are no longer needed or do not meet the needs of users and cannot be adapted in any way; or

2. that the existing facilities are being adequately re-provided in a different way or elsewhere in a convenient alternative location, in accordance with Encouraging New Social Infrastructure Provision; or that there are sufficient suitable alternative facilities in the locality; and
3. the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use has been fully considered.

### New Policy LP 28

#### Social and Community Infrastructure

A. The Council will work with service providers and developers to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage.

#### New social and community infrastructure

B. Proposals for new or extensions to existing social and community infrastructure will be supported where:

1. it provides for an identified need;
2. is of a high quality and inclusive design providing access for all; and
3. where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access.

#### Loss of social or community infrastructure

C. Loss of social or community infrastructure will be resisted. Proposals involving the loss of such infrastructure will need to demonstrate clearly:

1. that there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted; or
2. that the existing facilities are being adequately re-provided in a different way or elsewhere in a convenient alternative location accessible to the current community it supports, or that there are sufficient suitable alternative facilities in the locality; and
3. the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use has been fully assessed. This should include evidence of completion of a full and proper marketing exercise of the site for a period of at least two consecutive years in line with the requirements set out in Appendix 5.

D. Where the Council is satisfied that the above evidence has been provided and the change of use away from social and community infrastructure use has been justified, redevelopment for other employment generating uses or affordable housing should be considered.

#### **Impacts on existing social infrastructure**

E. Development proposals for 10 or more residential units should assess the potential impacts on existing social and community infrastructure in order to demonstrate to the Council that there is sufficient capacity within the existing infrastructure to accommodate the needs arising from the new development.

**8.1.1** The provision of adequate community and social infrastructure is essential to support the projected population growth within the borough. Such facilities are often at the heart of local communities; they are important for the quality of life of residents, in the creation of more inclusive and sustainable communities and in helping to promote social interaction and

encouraging people to lead more healthy and active lives. It is important that these facilities and services meet people's needs at all stages of their lives and are accessible to all.

**8.1.2** This policy covers any type of social and community infrastructure floorspace that is important to the local community. It encompasses a wide range of services, some of which are statutory services such as health and education and the Council will work with partners to ensure that local communities continue to have access to such services. Others are non-statutory community services such as cultural, play, recreation, sports and faith facilities including those for voluntary or charitable purposes. The Council considers it important to protect such uses and facilities as they play a key role in maintaining and fostering community and social cohesion. Some examples of social and community infrastructure include public services, GP surgeries, nurseries, community centres, public halls, arts and cultural facilities, policing, fire and ambulance services, youth centres, social clubs, indoor sport and recreation facilities, libraries, laundrettes, places of worship, and public houses. This is not an exhaustive list and the Council will determine, as part of the pre-application process, whether any facility or service is considered to be a social infrastructure or community use. Schools and other education facilities, health and social care facilities as well as leisure and recreation facilities are dealt with in more detail in separate policies within this Plan.

**8.1.3** Infrastructure provision and needs have been identified with the relevant partner organisations and are set out in the Council's Infrastructure Delivery Plan. There is an increasing need for nursery, education and health provision across the borough. More specific requirements for community facilities may be identified by local communities, for example as part of the Village Planning process or within a Neighbourhood Plan. The Council will work with partners including public and private infrastructure providers and the community and voluntary sector in ensuring the provision of services.

**8.1.4** It is recognised that in some instances there may need to be some additional development to support the cost of retaining or reproviding existing social infrastructure uses. Such development may be acceptable provided that the proposal will result in an overall improvement to the existing social and community facilities and services.

### **New social and community infrastructure**

**8.1.5** Provision of good quality social and community infrastructure is critical for social cohesion and contributes to the creation of lifetime neighbourhoods, i.e. places where people are able to live and work in safe, healthy, supportive and inclusive environments with which they are proud to identify. The Council will support the provision of new or extensions to existing social infrastructure where it provides for an identified need.

**8.1.6** Need is identified on an evidential basis from the Council and its partners strategies and plans, including:

- The Council's Infrastructure Delivery Plan
- The Council's Joint Strategic Needs Assessment
- The Council's School Place Planning Strategy
- The Council's Cultural Partnership Strategy
- Estates Strategies produced by health bodies, such as the NHS England and Richmond Clinical Commissioning Group
- Government departments Estates Strategies
- The Metropolitan Police Authority's Estates Strategy
- Other local evidence such as community needs identified as part of the Village Planning process or Neighbourhood Plans.

**8.1.7** Access for all is important including for the young, old and disabled. The appropriate level of accessibility to the public will depend on the nature of the scheme and its catchment. The types of larger facilities in multi-use buildings that will be visited regularly and by a greater number of people should be located in the borough's centres or areas of good public transport accessibility. Smaller facilities serving a more local catchment should be

accessible by walking or cycling. The Council will encourage high quality and sustainable design of social infrastructure including measures to improve its actual, and perception of, accessibility.

**8.1.8** Where practicable, social infrastructure and community facilities should be provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which can increase public access and help to minimise capital or revenue costs to community groups. Multi-use means, for example, that a school uses the school and playing fields during the school day, during term time and the facilities are available for use by the community outside school hours i.e. evenings, weekends and during school holidays. Community use could be individuals, sports and arts clubs or private groups, and can range from informal/occasional bookings through to planned, professional activity. Multi-use already exists in many forms within the borough. The Council will encourage and promote the multi-use of premises, including in independent and free schools and other private or commercial facilities for sports and community purposes, subject to appropriate management arrangements and community use agreements. The combined impact of multi-use facilities needs to be taken into account, including shared parking, hours of use, and the impact these may have on the character and amenity of the area, the living conditions of local residents, as well as consideration as to how flexible spaces will be used e.g. sufficient storage for different users and security considerations.

### **Loss of social or community infrastructure**

**8.1.9** Development pressures and high land values in the borough mean there is pressure to redevelop sites and it can be difficult to find new sites for community use, especially for use by voluntary groups. The Council will resist the loss or change of use of existing social or community infrastructure. Consequently the potential of re-using, refurbishing or redeveloping existing sites for continued social or community infrastructure use must be assessed in order to preserve a sufficient range and amount of such infrastructure across the borough.

## 8 Community Facilities

### Pre-Publication Local Plan

**8.1.10** To assess the loss of social infrastructure, the Council will require evidence to justify the loss and demonstrate that it is no longer an essential local facility. The applicant must demonstrate that either

1. there is no longer a community need for the facilities or they no longer meet the needs of users and cannot be adapted in any way. This should be based on evidential need and related to the Council's and its partners strategies and plans and may include evidence of a public disposal process. Where the application relates to the loss of a health facility, written agreement from the Richmond Clinical Commissioning Group, NHS England or other relevant health body must be provided; or
2. the existing facilities are being adequately re-provided in a different way or elsewhere in a convenient alternative location that is accessible to the current community it supports, or that there are sufficient suitable alternative facilities in the locality. Any redevelopment proposal must not lead to or increase any shortfall in provision. Consideration will be given to whether alternative facilities are accessible to all, well located and sustainable.
3. Alongside either 1 or 2 as set out above, it is essential that the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use is assessed. This should include a full and proper marketing exercise ongoing for a period of at least two years. As part of the marketing process space should be offered at a reasonable charge for community groups / voluntary sector organisations reflecting its existing use value and condition. More detailed information on marketing requirements is provided in Appendix 5. Where the site is an existing health facility, consideration should first be given to re-using the site for other health facilities and applicants should contact NHS Property Services to discuss their needs for health floorspace in the area.

**8.1.11** In some cases, change might be inevitable, for example to meet the changing needs of users or through multi-use to make continued provision more economically viable. Any strategies produced by third parties demonstrating local need should have been subject to consultation with appropriate bodies to demonstrate the robustness of the evidence to the Council. If a public disposal process has taken place as part of an agreed programme of social infrastructure re-provision which confirms that the disposal of assets is necessary to ensure continued delivery of social infrastructure and related services, this will be taken into account by the Council when assessing proposals against the criteria set out in this policy.

**8.1.12** Where the Council is satisfied that the above evidence has been provided and redevelopment away from a social or community infrastructure use or an educational use may be appropriate, redevelopment or change of use for employment generating uses should be considered. Wholly affordable housing schemes would also be supported by the Council where other policy priorities are met to demonstrate wider benefits to meet community needs.

### Impacts on existing social infrastructure

**8.1.13** Development proposals for major developments are likely to put an additional burden on existing facilities, particularly on education and health infrastructure. Therefore, the potential impact of development proposals on existing social and community infrastructure must be assessed by the applicant as part of the planning application process, supported by evidence, to ensure that there is capacity within the existing infrastructure. Where necessary, measures will need to be put in place to mitigate against the impacts of development on existing services. This could include financial contributions and / or Planning Obligations (in line with the Council's Planning Obligations SPD), and / or where appropriate, on-site provision of community facilities.

### Assets of Community Value

**8.1.14** Community groups have a right to nominate buildings or other land as Assets of Community Value where they believe they are of importance to their community's social well-being. If the asset comes up for sale, then the community will be given six months to make a bid to buy it on the open market. The Assets of Community Value process is helpful in testing the viability of community uses as the bidding process will demonstrate whether there are workable proposals to sustain or reuse the premises.

**8.1.15** Loss of Assets of Community Value will be strongly resisted in line with the requirements and criteria set out in this policy.

## 8.2 Education

### Why we are reviewing this policy area

The policy relating to education is considered to be in line with national and regional policies and the overall policy approach will be retained. However, it will need to be updated to more accurately reflect local needs, such as in relation to schools and nurseries. There is also the intention to strengthen the policy in relation to the requirements for dual-use / community use of schools outside of term times and school hours.

In addition, the Council has been working closely with the Education Funding Agency to deliver new schools. There is a need to consider the impacts of the changes to the way schools are developed and funded, and the policy will be updated in this regard.

### What the evidence says

Evidence indicates that there is a continuing need for additional school and nursery places across the borough. The Council's School Place Planning Strategy provides evidence that more school places are required to meet longer-term forecast demand, particularly in the primary phase.

In relation to nurseries, demand for free early years places in the borough is very high and each of the maintained nurseries is currently oversubscribed. The key areas of under-provision of nurseries and childcare in the borough are in Kew, Mortlake, Barnes and East Sheen, where there is only 10% access to full day childcare. The extended free childcare entitlement for working parents of 3- and 4-year-olds, which provides eligible parents with a total of 30 hours of free childcare per week, will be a challenge for the Council.

Further evidence in relation to the demand and need for schools and nurseries is set out in the Richmond Children and Young People's Needs Assessment as well as in the Richmond Childcare Sufficiency Assessment.

### Existing Policy CP16 - Local Services/Infrastructure

16.A The overall strategic approach is to ensure the provision of services and facilities for the community.

16.B The Council in working with other partners will ensure the adequate provision of such services and facilities, especially in areas of relative deprivation. The Council will aim to facilitate co-location of council, health, library and school facilities where opportunities arise.



16.C Loss of community facilities will be resisted unless it can be shown that the facilities are no longer needed or that the service could be adequately re-provided in a different way or elsewhere.

16.D New developments will be expected to contribute to any additional infrastructure and community needs generated by the development. New development will also have to take account of the requirements set out in the Planning Obligations Strategy (Supplementary Guidance to the UDP). Obligations will be sought in accordance with Circular 05/05 and any superseding advice.

#### **Existing Policy CP18 - Education and Training**

18.A The Council will ensure that the provision of schools, pre-schools and other education and training facilities are sufficient in quality and quantity to meet the needs of residents. Demand for primary places is currently particularly high in Richmond/ East Sheen, St Margaret's/ East Twickenham and Teddington.

18.B Land in educational use will be safeguarded and new sites may be identified in the Site Allocations DPD. The potential of existing educational sites will be maximised through redevelopment, refurbishment or re-use to meet educational needs.

18.C Facilities and services for the education and training of all age groups should be in locations that are conveniently accessible to users. The Council will work with partners to ensure the provision of post 16 education and training to help to reduce inequalities and support the local economy.

18.D Developers will have to take into account the potential need to contribute to the provision (Planning Obligations Strategy) of primary and secondary school places in the Borough, and training opportunities for residents.

#### **New Policy LP 29**

##### **Education and Training**

A. The Council will work with partners to encourage the provision of facilities and services for education and training of all age groups to help reduce inequalities and support the local economy, by the following means:

1. supporting the provision of facilities to meet the needs for primary and secondary school places as well as pre-school and other education and training facilities;
2. safeguarding land and buildings in educational use;
3. identifying new sites for educational uses as part of this Plan; the Council will work with landowners and developers to secure sites for pre-schools, primary and secondary schools as well as sixth forms to ensure sufficient spaces can be provided for children aged 2-18;
4. encouraging the potential to maximise existing educational sites through extensions, redevelopment or refurbishment to meet identified educational needs;
5. encouraging flexible and adaptable buildings, multi-use and co-location with other social infrastructure.

B. The Council will promote local employment opportunities and training programmes. Where the employment opportunities generated by construction as well as the end use of the development create more than 20 (Full Time Equivalent) jobs, a Local Employment Agreement, secured through a Section 106 agreement, will be required.

**8.2.1** London is one of the world's global centres for education and the London Borough of Richmond plays a key role in fulfilling this role. The borough is home to an excellent range of schools, including outstanding and top-performing primary and secondary schools as well as higher education institutions, including St Mary's University.

**8.2.2** The Council takes a proactive, positive and collaborative approach to meeting school place requirements. This includes working with partners, including the Education Funding Agency as well as educational providers, to provide the quantity and diversity of school places needed within the borough.

**8.2.3** Priority will be given to providing a high standard of education facilities to meet identified needs in the borough. This policy applies to all ages and abilities, including special education needs, and therefore includes childcare, primary and secondary schools, sixth forms as well as higher and further education.

**8.2.4** Co-location and multi-use of education facilities with other social infrastructure and community uses will be encouraged where practicable, in line with policy LP 28 in 8.1 'Social and Community Infrastructure'. Multi-use and co-location of facilities contributes to optimising the use of land and can increase the wider community benefits of educational proposals. It can lead to increased public access, particularly of sports facilities (indoor and outdoor) through, for example, the use of school playing fields by professional sport clubs, other schools and community groups. The Council will seek to ensure multi- / community use of schools, including private schools, through appropriate measures, such as Community Use Agreements.

### **Meeting educational needs and delivery of new schools**

**8.2.5** Under Section 14 of the Education Act 1996, the Council has a duty to ensure the provision of sufficient state-funded school places for all those residents who want them for their children. In accordance with the

Academies Act 2010, any new non-voluntary-aided school must in effect be a free school. (Voluntary-aided schools are generally religious or faith schools.)

**8.2.6** The Council's ability to meet its statutory duty to provide the number and range of school places has, in recent years, become more challenging as a result of the national freedoms and flexibilities which enable different providers to come into the market through the free school route. The role of local authorities has been significantly reduced as a result.

**8.2.7** Consequently, the Council has to work with a variety of organisations who could, in theory, regard themselves as more independent than the Council's existing community schools and converter academies. In addition, the Council does not know until quite late in the process whether the Department for Education will accept a free school proposal in order that the required places can be created and if, through the Education Funding Agency, they will then be able to find a suitable site for the school. This challenge is compounded by the choices made by parents as to whether to use private sector establishments as an alternative, and due to the Greenwich Judgement<sup>(10)</sup>, places in local schools cannot be reserved only for children resident in the borough. As a result of the above factors, the Council's overall ability to forecast demand and plan for school places accurately is challenging.

**8.2.8** Notwithstanding the above challenge, the School Place Planning Strategy for the borough, which is reviewed regularly, sets out the anticipated likely demand for school places and how this will be met over the next ten years. This includes the demand for additional primary places within each of the ten school place planning areas and when further secondary phase places will be required.

**8.2.9** The Council will assist in identifying and, where appropriate, allocating sites for educational uses to support the provision of sufficient state-funded primary and secondary school places during the Local Plan

<sup>10</sup> The Greenwich Judgement (R v London Borough of Greenwich, ex parte John Ball Primary School, 1989) established that it was unlawful for a local authority to give priority in a school's over-subscription criteria on the basis of a child's residence within the authority's administrative area.

## 8 Community Facilities

### Pre-Publication Local Plan

period. In this context, the Council works closely with the Education Funding Agency and the Department for Education to identify possible sites for new schools and, where appropriate, to indicate its support for free school proposals.

**8.2.10** The Council recognises that the independent sector makes a contribution to providing education facilities for the borough's children and young people. The Council is generally supportive of proposals which increase the provision of places within that sector, provided they can evidence that they meet local need.

**8.2.11** Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan:

- Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college
- Stag Brewery, Mortlake: provision of a new 6-form of entry secondary school, including sixth form
- Ryde House, East Twickenham: provision of a new 2-form of entry primary school
- Barnes Hospital, Barnes: provision of 2-form of entry primary school

**8.2.12** The Council will work with the Education Funding Agency, Department for Education, landowners and other partners to identify and, where necessary, allocate sites for the future provision of schools to meet the needs of local communities and enable the Council to meet its duty under the Education Act. Ongoing work is taking place to identify other potential sites for educational uses in the borough.

**8.2.13** In addition, the Council is committed to working with St Mary's University to address the growing demand for university places by developing a Masterplan in partnership with the University.

### Employment and skills trainings

**8.2.14** The Council will promote local employment opportunities and training programmes, particularly where there are opportunities arising from developments. The construction phase of new development provides opportunities for local employment, apprenticeships and work experience placements. Commercial developments within the borough also bring new employment, apprenticeship and work-experience opportunities for local residents during the end-use phase. Apprenticeships and work experience placements will enable residents to develop an appropriate skill-set for existing and future employment opportunities within the borough.

**8.2.15** Consequently, on all development proposals generating 20 FTE (Full Time Equivalent) jobs or more (this also covers end use jobs and those created within one year of completion of the development), the Council will require Local Employment Agreements (LEA), secured through Section 106 agreements, that set out the skills, employment and training opportunities to be delivered from the development.

## 8.3 Health and Wellbeing

### Why we are reviewing this policy area

This policy is in general conformity with national and regional policy but is in need of updating to address:

- the greater understanding of the important role that planning can play in the development of healthy communities;
- national priorities including tackling health inequalities and improving social cohesion, as well as local priorities as set out in the Joint Strategic Needs Assessment (JSNA) (e.g. ageing population, obesity etc.);
- the local requirement for Health Impact Assessments and their purpose;
- the greater emphasis nationally on joint working between Planning and Public Health departments

- specifically the needs of older people;
- greater cross-referencing to other areas of the local plan that play a part in promoting healthy communities and reducing health inequalities, such as open and play space, social infrastructure, housing and transport policies.

### What the evidence says

The Joint Strategic Needs Assessment (JSNA) suggests that there are clear health inequalities across the borough with life expectancy about 5 years lower for men and 4 years lower for women in the most deprived than in the least deprived areas of the borough; the estimated numbers of people in the borough with unhealthy lifestyles are substantial, for example, only 23% of residents use outdoor space for exercise or health reasons; and there are increasing numbers of people with multiple long term conditions. For example, nearly one in three people registered with a GP in the borough has one or more long-term condition(s) and nearly one in ten has three or more.

In terms of health infrastructure, there is a shortage of GP premises / floorspace across all areas of the borough. Mapping of health and social care facilities will be undertaken as part of the Council's Infrastructure Delivery Plan.

### Takeaways and tackling obesity

The evidence suggests there is an emerging obesity issue in the borough. In reception year, 18.1% of children are overweight or obese and in Year 6 the prevalence rises to 24.4%. 45% of adults (approximately 65,000) are estimated to be obese or overweight. In order to contribute towards tackling this emerging issue, we propose introducing a restriction on the development of further fast food takeaways in close proximity to schools. This policy approach has already been adopted in other London boroughs.

### Existing Policy CP17 - Health and Well Being

17.A Health and well-being in the Borough is important and all new development should encourage and promote healthier communities and places.

17.B The provision of new or improved facilities for health and social care and other facilities will be supported. Such facilities should be in sustainable locations and accessible to all and priority will be given to those in areas of relative deprivation which are identified in Core Policy 13, an immediate need for primary health care facilities (especially doctor's surgeries) has been identified in Kew, Richmond, Whitton and Ham. Sites for larger facilities may be identified in the Site Allocations DPD.

17.C A pattern of land use and facilities will be promoted to encourage walking, cycling, and leisure and recreation and play facilities to provide for a healthy lifestyle for all, including provisions for open and play space within new development as appropriate.

17.D Existing health, social care, leisure and recreation provision will be retained where these continue to meet or can be adapted to meet residents' needs. Land will be safeguarded for such uses where available, and the potential of re-using or redeveloping existing sites will be maximised.

#### New Policy LP 30

##### Health and Wellbeing

Planning, at all levels, can play a crucial role in creating environments that enhance people's health and wellbeing. The Council promotes and supports healthy and active lifestyles and measures to reduce health inequalities.

A. The Council will support development that results in a pattern of land uses and facilities that encourage:

1. Sustainable modes of travel such as safe cycling routes, attractive walking routes and easy access to public transport to reduce car dependency.
2. Access to green infrastructure, including river corridors, local open spaces as well as leisure, recreation and play facilities to encourage physical activity.
3. Access to local community facilities, services and shops which encourage opportunities for social interaction and active living, as well as contributing to dementia-friendly environments.
4. Access to local healthy food, for example, allotments and food growing spaces.
5. Access to toilet facilities which are open to all in major developments where appropriate (linked to the Council's Community Toilet Scheme).
6. An inclusive development layout and public realm that considers the needs of all, including the older population and disabled people.

B. This policy will be delivered by requiring developments to comply with the following:

1. A Health Impact Assessment must be submitted with all major development proposals.

2. The Council will refuse proposals for new fast food takeaways (A5 uses) located within 400 metres of the boundaries of a primary or secondary school in order to restrict the availability of unhealthy foods.
3. Existing health facilities will need to be retained where these continue to meet, or can be adapted to meet, residents' needs.
4. Applications for new or improved facilities or loss of health and social care facilities will be assessed in line with the criteria set out in the Social and Community Infrastructure policy.

##### Healthy Lifestyles

**8.3.1** Health and wellbeing is a cross-cutting theme, which has links with many other parts of the Local Plan.

**8.3.2** The environment in which we live is a key determinant in people's health and wellbeing. The planning system plays an important role in influencing the built and natural environment and therefore plays a key role in the physical and mental wellbeing of the population. A healthy environment can promote healthy lifestyles for all and can contribute to a reduction in health inequalities.

**8.3.3** The Joint Strategic Needs Assessment (JSNA) for the borough identifies that a high proportion of the population have unhealthy lifestyles. Unhealthy lifestyles, influenced by the environments in which we live, are contributing to a rise in preventable illnesses such as diabetes, obesity and cardiovascular and respiratory diseases. Prevention of ill-health by helping people to live healthier lives in order to prevent avoidable illness, is a major focus of the health services. Healthy and active people tend to be less dependent on health and social care services so there are tangible economic benefits in encouraging and making it easy for the population to lead healthy lifestyles.



**8.3.4** Planning can play a part in facilitating the creation of healthy environments. Development should result in a pattern of land uses and facilities that make the healthy choice the most convenient and attractive option for residents, helping them to lead healthier lives more easily.

**8.3.5** Policy LP 44 in 11.1 'Facilitating Sustainable Travel Choices' promotes active travel such as cycling and walking, including easy access to public transport. Policy LP 1 in 4.1 'Local Character and Design Quality' ensures that walking and the public realm should be designed to be safe and accessible for all ages and levels of disabilities. A clearly signposted street network with way-marking for walking (in distance and minutes) to destinations is important in encouraging and facilitating walking as a sustainable mode of travel. The Council will seek inclusion of signage on major development sites.

**8.3.6** The borough's extensive provision of parks and open spaces enable local communities to lead lifestyles with greater levels of physical activity, resulting in better physical and mental health improvements, reduced stress levels and increased social interaction. These spaces provide a vital free resource in which people of all ages can play, exercise, relax and enjoy the natural world, so easy access for all residents to high quality open and natural space is important, particularly within identified areas of deficiency (see policy LP 31 in 8.4 'Public Open Space, Play Space, Sport and Recreation'). Parks and open spaces are particularly important in promoting activity in young children thereby targeting the increasing childhood obesity levels in the borough. Children's play space and outdoor 'green gyms' for use by the whole community are encouraged.

**8.3.7** Access to local community facilities, services, shops and meeting places such as community centres and local pubs is important in facilitating social interaction and general community wellbeing and happiness. In line with policy LP 28 in 8.1 'Social and Community Infrastructure', co-location of community facilities such as healthcare services and leisure centres is encouraged.

**8.3.8** Access to local healthy food is another important part of a healthy community. Allotments and community food growing is important not only in the provision of fresh, healthy and locally produced food, but also in facilitating gentle exercise, fresh air and interaction with the natural environment which is known to have positive effects on mental wellbeing. New development should provide, where possible, opportunities for households to own or have access to space to grow food, for example roof or communal gardens or allotments. Also see policy LP 32 8.5 'Allotments and Food Growing Spaces'.

### Older people

**8.3.9** Life expectancy has been increasing over time and there is a national trend towards an ageing population. The borough has the highest proportion of people aged over 75 and living alone in London and there are increasing numbers of older people living at home with long term physical and mental conditions such as dementia. Planning can play a role in the creation of environments and a public realm that are inclusive and accessible for the older population, including for those with dementia.

**8.3.10** Design of the built environment should specifically consider the needs of the older population such as more seating opportunities and benches. A high quality, inclusive and accessible urban environment will enable the older population to remain independent and active for longer, thereby reducing the need for extensive adaptations to buildings.

**8.3.11** Housing development should consider the needs of the older population. Opportunities to enable older people to downsize is recognised in policy LP 35 in 9.2 'Housing Mix and Standards', along with higher standards for inclusive access, and new accommodation should meet identified local needs as set out in policy LP 37 in 9.4 'Housing Needs of Different Groups'.

### Health Impact Assessment

## 8 Community Facilities

### Pre-Publication Local Plan

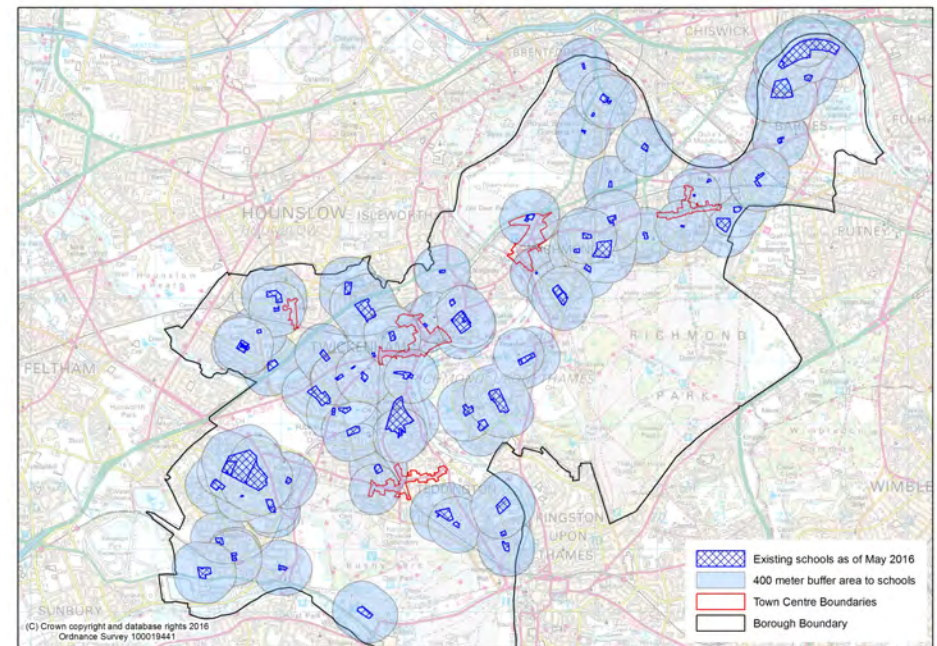
**8.3.12** A Health Impact Assessment (HIA) must be submitted with all major applications. A HIA should assess the health impacts of a development, identifying mitigation measures for any potential negative impacts as well as measures for enhancing any potential positive impacts.

#### Takeaways

**8.3.13** There is an emerging obesity issue in the borough, particularly in children. One established method of addressing obesity is by restricting access to unhealthy foods, particularly fast food takeaways. Childhood obesity amongst school age children is a concern as evidence suggests that obese children are more likely to be obese adults and are at an increased risk of developing further health difficulties. Access to fast food takeaways detracts from the ability to adopt healthy lifestyles and undermines healthy eating initiatives that may be in place at the school. Therefore this policy focuses particularly on restricting access to fast food takeaways in close proximity to schools.

**8.3.14** The Council will refuse proposals for fast food takeaways located within 400 metres of the boundaries of a primary or secondary school. 400m is a 5-10 minute walk and it is suggested that this is the maximum distance that students would walk to and back from in their lunch break. Outside of these 400m 'restriction' zones, applications for fast food takeaways will be considered in line with other policies in this plan.

**8.3.15** The following map shows the existing schools within the borough (as of May 2016) and the associated 400 metre buffer area, which are the 'restriction' zones for fast food takeaways:



#### Health Infrastructure

**8.3.16** Health facilities should provide quality care to local communities and be responsive to patient needs. The Richmond Clinical Commissioning Group (CCG) is responsible for the planning and commissioning of health care services for the borough. The CCG works closely with NHS England to deliver primary care services and the Council will work with the CCG and NHS England to support the provision and integration of health and social care facilities in the borough.

**8.3.17** There is pressure on health facilities across the borough with some shortfall in GP floorspace in each of the four commissioning clusters in the borough. Existing health facilities should be protected and the provision of new or improved facilities appropriate to local needs is

encouraged. Applications for new or loss of health and social care facilities will be considered in line with the criteria of policy LP 28 in 8.1 'Social and Community Infrastructure'.

#### 8.4 Public Open Space, Play Space, Sport and Recreation

##### Why we are reviewing this policy area

The policies in relation to public open space, play space and sport and recreation are in general conformity with national and regional guidance. However, there is a need to reflect updated evidence in relation to open spaces, play, sport and recreation and there is the opportunity to consolidate policies.

This will provide clearer and more specific requirements in relation to assessing play space and public open space provision as well as the impacts from new development on such facilities, including the expectations on larger sites. For assessing play space requirements resulting from new developments, the policy needs to be updated to specifically refer to the Council's child yield calculator. There is also a need to set out specific guidance for developers in areas of deficiency.

The special protection and presumption against the loss of playing fields will be retained, but references to the NPPF and Sport England's policy on assessing special circumstances will be included.

We also want to strengthen the links to the Local Plan's health and wellbeing policies and the role that play, open space and sports facilities play for social cohesion.

##### What the evidence says

The Council updated its evidence base in relation to open spaces, play spaces as well as sport and recreation in 2015:

- The Open Space Assessment Report sets out that 83% of all open spaces score above the thresholds set for quality, reflecting the generally excellent standard of sites. In addition, 98% of all open spaces are assessed as being above the threshold for value, a reflection towards the importance of open space provision in providing social, environmental and health benefits.
- The Open Space Assessment Report demonstrates that there is generally a very good spread of play provision across the borough, and the majority of sites (95%) have been assessed as being of very high quality. No current gaps have been identified in the provision of play spaces; there are 44 dedicated sites with play areas, of which 42 sites rate above the quality threshold.
- The Council's Planning Obligations SPD sets out the methodology for calculating and assessing the child occupancy and subsequent play space requirements for development sites within the borough.
- The Playing Pitch Strategy Assessment Report and the main Playing Pitch Strategy set out the need to protect public and private sports grounds including playing fields and playing pitches. The Strategy highlights a need for 4 additional 3G (third generation artificial turf) pitches in the next 10 years to accommodate the need and future demand for football and rugby and in particular floodlit training facilities. It also recommends improving pitch quality and changing facilities. There is currently no identified need for additional hockey pitches, bowling greens and tennis courts, although floodlighting for tennis courts remains an issue that, if resolved, could significantly extend the hours available to meet current demand (any proposals for floodlighting would be subject to other policies in this Plan). The Playing Pitch

Strategy also recommends maximising community use of outdoor sports by securing access to sites through a range of solutions and partnership agreements.

#### Existing Policy CP10 - Open Land and Parks

The open environment will be protected and enhanced. In particular:

10.A The Borough's green belt, metropolitan open land and other open land of townscape importance, land on the Register of Parks and Gardens of Special Historic Interest, green chains and green corridors will be safeguarded and improved for biodiversity, sport and recreation and for visual reasons.

10.B To identify a number of additional areas of open land of townscape importance, which will be brought forward through the Site Allocations DPD.

10.C The hierarchy of open spaces below (list of parks and open spaces within each category is shown in appendix 3), will be retained and managed in accordance with the principles shown.

Public Open Space Hierarchy:

Type and main Function	Function and strategic proposals
Regional Parks 400 ha+	<ul style="list-style-type: none"> <li>Large areas of natural land</li> <li>Primarily informal recreation, some active recreation</li> <li>Car parking at key locations</li> </ul>

Metropolitan parks 60 – 400 ha	<ul style="list-style-type: none"> <li>To include provision of playing fields, golf courses and other uses which require extensive land.</li> <li>To include areas managed for nature conservation purposes</li> <li>To include extensive land for informal activities such as walking, picnics and barbeques.</li> <li>To include some car parking and refreshment facilities.</li> <li>To include children's play facilities.</li> </ul>
District parks 20 – 60 ha	<ul style="list-style-type: none"> <li>To include all of the above but majority of space to be more formally managed as playing fields.</li> </ul> <p>Proposals Treat as key parks: Sheen Common Palewell Common Old Deer Park KnellerGardens/CranePark</p>
Local parks2 – 20 ha	<ul style="list-style-type: none"> <li>To provide children's play, court games and nature conservation.</li> <li>Limited playing field provision.</li> </ul> <p>Proposals Treat as key parks: Barn Elms Carlisle Park Hatherop Park King Georges Field North Sheen Rec Kingsfield Murray Park</p>



Small local parks and open spaces  Less than 2 ha	<ul style="list-style-type: none"> <li>To provide gardens, sitting out areas, playgrounds and nature conservation.</li> </ul> <p>Proposals Treat as key parks: Vine Road Rec Mortlake Green</p>
Linear open spaces	<ul style="list-style-type: none"> <li>To be managed to provide for informal recreation, including nature conservation.</li> </ul>

10.D To encourage new provision in areas of open space deficiency at Upper Richmond Road West, between Park Road/ Uxbridge Road Hampton Hill, Fulwell, South Twickenham, parts of St Margaret's and parts of Whitton. All developments will be expected to incorporate appropriate elements of open space that make a positive contribution to the wider network.

#### **Existing Policy CP16 - Local Services/Infrastructure**

16.A The overall strategic approach is to ensure the provision of services and facilities for the community.

16.B The Council in working with other partners will ensure the adequate provision of such services and facilities, especially in areas of relative deprivation. The Council will aim to facilitate co-location of council, health, library and school facilities where opportunities arise.

16.C Loss of community facilities will be resisted unless it can be shown that the facilities are no longer needed or that the service could be adequately re-provided in a different way or elsewhere.

16.D New developments will be expected to contribute to any additional infrastructure and community needs generated by the development. New development will also have to take account of the

requirements set out in the Planning Obligations Strategy (Supplementary Guidance to the UDP). Obligations will be sought in accordance with Circular 05/05 and any superseding advice.

#### **Existing Policy CP17 - Health and Well Being**

17.A Health and well-being in the Borough is important and all new development should encourage and promote healthier communities and places.

17.B The provision of new or improved facilities for health and social care and other facilities will be supported. Such facilities should be in sustainable locations and accessible to all and priority will be given to those in areas of relative deprivation which are identified in Core Policy 13, an immediate need for primary health care facilities (especially doctor's surgeries) has been identified in Kew, Richmond, Whitton and Ham. Sites for larger facilities may be identified in the Site Allocations DPD.

17.C A pattern of land use and facilities will be promoted to encourage walking, cycling, and leisure and recreation and play facilities to provide for a healthy lifestyle for all, including provisions for open and play space within new development as appropriate.

17.D Existing health, social care, leisure and recreation provision will be retained where these continue to meet or can be adapted to meet residents' needs. Land will be safeguarded for such uses where available, and the potential of re-using or redeveloping existing sites will be maximised.

#### **Existing Policy DM OS 6 - Public Open Space**

Public Open Space will be protected and enhanced. Improvement of the openness and character of the Public Open Space including measures to allow for convenient access for all residents will be encouraged where appropriate.



New Public Open Space with convenient access for all will be provided where possible, or existing areas made more accessible, particularly in areas poorly provided with public open space. These will be linked to the wider network of open spaces. Financial contributions will be required for most new developments towards the provision of, or improvements to public open space.

Larger new developments will be expected to include open space provision within the scheme, with the aim to strike a balance between private, semi-private and public open space provision.

#### **Existing Policy DM OS 7 - Children's and Young People's Play Facilities**

Children's and young people's play facilities will be protected and the improvement and enhancement of existing facilities and their accessibility will be encouraged. New children's and young people's play facilities will be provided or existing spaces enhanced where possible, particularly in areas poorly provided with play facilities.

New developments must assess the needs arising from the new development by following the benchmark standards outlined in the Mayor's Supplementary Planning Guidance on Providing for Children and Young People's Play and Informal Recreation (see para 4.1.27).

All developments with an estimated child occupancy of ten children or more should seek to make appropriate play provision to meet the needs arising from the development. Where this provision cannot be met on-site or for developments yielding less than 10 children, the Council will seek an equivalent financial contribution to fund off-site provision.

#### **Existing Policy DM OS 8 - Sport and Recreation Facilities**

Public and private sports grounds including playing fields and recreational areas, courts and greens as well as private open space in recreational use will be protected and enhanced. Owners of private facilities will be encouraged to make them available for public access and use.

#### **New Policy LP 31**

##### **Public Open Space, Play Space, Sport and Recreation**

A. Public Open Space, children's and young people's play facilities as well as formal and informal sports grounds and playing fields will be protected, and where possible enhanced. Improvements of existing facilities and spaces, including their openness and character and their accessibility and linkages, will be encouraged.

New open spaces, play facilities and formal and informal land for sport and recreation should be linked to the wider Green Infrastructure network as they play an important role in creating social cohesion, encouraging and promoting healthier and more active lifestyles.

##### **Impacts on existing provision**

B. The Council will require all major development proposals in the borough to meet the Public Open Space and play space needs arising out of the development by requiring the following:

1. **Public Open Space:** applicants should provide an analysis of existing open space provision in line with the Council's accessibility standards for travel to open spaces.

Where there is inadequate existing provision and limited access to such facilities, publicly accessible facilities will be expected on site to mitigate the impacts of the new development on existing provision.

2. **Play space:** applicants should provide a play and child occupancy assessment to determine whether the proposal will lead to an estimated child occupancy of ten children or more, by using the Council's child yield calculator as set out in the Planning Obligations SPD. In addition, an assessment of existing play facilities within the surrounding area will be required.

Where the assessment demonstrates an estimated child occupancy of ten children or more, the development proposal should make appropriate and adequate provision of dedicated on-site play space by following the London Plan benchmark standard of 10sqm per child.

The Council will seek to integrate new major development within existing village areas and neighbourhoods. Therefore, new dedicated on-site play space should be made publicly accessible.

3. Where on-site provision of Public Open Space or play space is not feasible or practicable, the Council will expect existing surrounding facilities and spaces to be improved and made more accessible to the users and occupiers of the new development through, for example, improved walking and cycling links or enhancements of play space facilities. Financial contributions will be required to either fund off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development.

**8.4.1** National policy and guidance states that existing open spaces, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

**8.4.2** The Council has produced assessments of need for open space (including play space), sports and recreation facilities, including opportunities for new provision, as well as a borough-wide Playing Pitch Strategy. These, together with the site-specific open space and play space needs assessments for major developments, will provide the starting point for assessing any proposals that could lead to a loss of, or could impact on, existing facilities.

**8.4.3** Open spaces, play spaces and sport and recreation facilities are important components of social infrastructure. The Council will not support gated or segregated developments and major development proposals should strike a balance between on-site private amenity space, semi-private and publicly accessible provision. There is an expectation for play spaces to be made publicly accessible, which may also assist in addressing the need for on-site Public Open Space provision. This will also contribute to creating inclusive environments and developments that integrate with existing neighbourhoods and local communities, thus fostering social cohesion.

**8.4.4** The extensive provision of parks and open spaces in the borough, including formal and informal land and facilities for sport and recreation, close to homes and places of work, will contribute to encouraging healthier lifestyles as well as increased walking and cycling with consequential health benefits. Parks and open spaces are particularly important in promoting activity in young children, thereby targeting the increasing childhood obesity levels in the borough. Easy access for all residents to

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high quality Public Open Space, play space and other land for formal or informal recreation is important, particularly within identified areas of deficiency.

#### Public Open Space

**8.4.5** The borough benefits from many open and green spaces that contribute greatly to its unique environment, distinctive character and recreational opportunities. This policy seeks to maintain, and where possible improve, the quality and provision of, Public Open Space in the borough, particularly in areas identified as being deficient in Public Open Space.

**8.4.6** There is no formula for calculating the provision of on-site Public Open Space. The aim is to achieve an appropriate balance alongside the provision of private and semi-private spaces. Implementing fixed standards could undermine the ability to achieve development proposals that maintain, and where appropriate enhance, the character of an area. It is the overall design and layout, taking all factors into account, including different uses and occupiers, design quality and inclusiveness, that will determine the appropriate balance between on-site private amenity space, semi-private and publicly accessible provision.

**8.4.7** Opportunities to create new Public Open Space will generally be limited in this borough as many areas are already developed or protected open land. However, there are areas of Public Open Space deficiency, as identified on the Proposals Map, which are derived by applying a 400 metre buffer area to designated Public Open Space. Adjustments to the 400m buffer area have been made at the following locations to reflect specific circumstances:

- Teddington (along Harrowdene Gardens, Fairfax Road) / Bushy Park: adjustments have been made at this location to take account of the

combination of reduced accessibility over the railway line, and limited access points into Bushy Park; and

- Feltham/Hounslow Junction: the triangle of land has been included in the areas of Public Open Space deficiency to take into account reduced access due to the railway lines.

**8.4.8** New major developments may lead to increases in usage and may therefore put an additional burden and pressure on the capacity of the existing provision. By using the accessibility standards as set out in the paragraph below as well as the designated areas of Public Open Space deficiency, applicants should provide an analysis of existing open space provision relevant to the development site.

**8.4.9** Where there is inadequate existing provision, or limited access to such facilities, to serve the new development, on-site Public Open Space will be expected in order to mitigate the impacts of the new development on the existing provision. In line with the Council's Open Space Assessment, the following accessibility standards will be applied for assessing travel to open space provision from new development sites:

- 15 minute walk time (1200m) - for Parks and Gardens
- 15 minute walk time (1200m) - for Natural and Semi-natural Greenspace
- 5 minute walk time (400m) - for Amenity Greenspace (including small local parks and open spaces as well as pocket parks)

**8.4.10** It is acknowledged that on-site provision may not be feasible or practicable for every major development site, but this will be assessed on a case-by-case basis, taking account of the existing open space provision relevant to the development site. Where it has been accepted by the Council that on-site provision cannot be made, the Council will expect existing surrounding open spaces to be improved, and where appropriate made more accessible to the users and occupiers of the new development. Financial contributions may be required to either fund new off-site provision, or improvements and enhancements of existing facilities, including access arrangements, in order to mitigate the impacts of new development.

## Play space

**8.4.11** This policy seeks to maintain, and where possible improve, the children's and young people's play facilities in the borough. As set out in the Council's Open Space Assessment, the borough is generally well served with play spaces that are of high quality.

**8.4.12** New development, where the estimated child occupancy is ten children or more, could lead to increased usage of, and therefore place additional burdens and strains on, existing facilities. Consequently, developers for major applications will be required to submit a child occupancy assessment in line with the Council's child yield calculator as set out in the Planning Obligations SPD. Where the assessment demonstrates an estimated child occupancy of ten children or more, the development proposal should make appropriate and adequate provision of dedicated on-site play space by following the London Plan benchmark standard of 10sqm per child.

**8.4.13** In addition, the applicant should provide an assessment of the existing provision of play space within reasonable walking distance from the site. In line with the London Plan, reasonable walking distances for assessing play space requirements are:

- 100 metres for under 5 year olds,
- 400 metres for 5-11 year olds, and
- 800 metres for 12+ age group.

**8.4.14** Where the assessment of existing play facilities within the surrounding area demonstrates sufficient and high quality provision, on-site provision of play facilities may not be necessary, but this will be assessed on a case-by-case basis. Financial contributions may however be required to either fund new off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development.

**8.4.15** Further guidance on the appropriate level of provision for play and informal recreational spaces in developments is set out in the Mayor's 'Supplementary Planning Guidance on Shaping Neighbourhoods: Play and Informal Recreation'.

## Playing fields, playing pitches and sport

**8.4.16** This policy seeks to protect all public and private sports grounds including playing fields, playing pitches, recreational areas, outdoor swimming pools, outdoor 'green gyms', courts and greens as well as private open space in recreational use. Such facilities and spaces make a significant contribution to the borough's unique character, openness and the wider Green Infrastructure network. Enhancements and improvements to existing facilities, including new, extended or enhanced community use, are encouraged.

**8.4.17** Proposals that could affect the loss or the quality of a playing field will be assessed against the borough-wide Playing Pitch Strategy, the criteria as set out in the NPPF as well as the Sport England Policy on planning applications for development on playing fields. Early engagement with Sport England will be required where a proposal affects a playing field or sports pitch.

**8.4.18** The Council will resist the loss of a playing field unless the proposal meets the exceptional circumstances test as set out in the Sport England policy. Where a proposal involves the loss, or impact on the size or quality, of a playing pitch, the applicant has to submit a full assessment demonstrating how the relevant guidance, policies and criteria have been addressed. There is also an expectation that overall the development will deliver an increase and enhancement of sports facilities, provision of wider public benefits, including public access, and therefore enabling and promoting physical activity and encouraging healthier lifestyles and habits for all ages.

**8.4.19** It is recognised that private sports facilities assist in meeting the wider sports needs of this borough as well as other neighbouring boroughs. Owners of private facilities are encouraged to make them available for public access and use.

**8.4.20** Indoor sport facilities are covered by policy LP 28 in 8.1 'Social and Community Infrastructure'.

### 8.5 Allotments and Food Growing Spaces

#### Why we are reviewing this policy area

In recognition that the provision of land for food growing will have many benefits including promoting more active lifestyles, healthier diets and social benefits, the approach to safeguard all allotment sites should be continued. The Council may consider referencing the fact that allotments would be considered an appropriate use in MOL (by referring to the MOL policy).

#### What the evidence says

The Council's Open Space Assessment Report (2015) identified 24 allotment sites in the borough. This meets the recommended standard of The National Society of Allotment and Leisure Gardeners (NSALG). However, long waiting lists (approx. 5 years) indicate an unmet demand for allotment spaces remains across the borough.

#### Existing Policy DM OS 10 Allotments and other food growing spaces

Existing allotments will be protected and enhanced. The provision of new allotments and other food growing spaces will be supported where opportunities arise.

#### New Policy LP 32

##### Allotments and food growing spaces

The Council will protect existing allotments and support other potential spaces that could be used for commercial food production or for community gardening, where possible.

The value of the allotment space in visual, ecological, biodiversity and historical terms will also be taken into account where there is development pressure on the land. Where allotments become surplus to requirements, other open space uses will be considered first, particularly where the existing allotment is in an area identified as deficient in Public Open Space provision.

**8.5.1** Allotments are an important component of open space and offer a diverse range of benefits for people, communities and environments to build healthier communities and promote healthy living. They provide recreational value, support biodiversity and landscape quality, contribute to physical and mental wellbeing, provide the possibility to grow fresh produce and contribute towards a healthy lifestyle that is active, sustainable and socially inclusive.

**8.5.2** There are currently 24 allotment sites in the borough that are managed by the Council, nine of which are designated as statutory allotments. All apart from three sites are on Council owned land and the



remainder are on Crown land. Statutory allotments have legal protection and these sites cannot be sold or used for other purposes without the consent of the Secretary of State. Allotments are an open community use and are appropriate within Metropolitan Open Land. Most of the non-statutory allotments are designated as other open land designations such as Green Belt, Metropolitan Open Land and Other Open Land of Townscape Importance and as such are protected from inappropriate development.

**8.5.3** Allotments address individual and social well being, by offering physical activity and outdoor exercise, a sense of pride and achievement and the production of good value and nutritional fruit and vegetables. However, they have a wider role as they form a part of the open space resource of the borough and can be a focus of educational interest and public engagement, neighbourliness and social solidarity. Allotment sites also make a contribution to the important areas of biodiversity and sustainability. It is worth noting that family members and friends often join in with activities on the allotments or share in its produce. The value is therefore not confined to the individual plot holders but spreads outwards in a ripple effect, representing an important opportunity for community interaction.

**8.5.4** The Borough's Open Space Assessment identified an unmet demand for allotments and therefore the existing overall area of allotments should be retained. However, it is unlikely that the Council would acquire completely new sites to meet this fluctuating demand, and the Council's Allotment Strategy identified that it is not necessary to consider the expansion onto new sites beyond existing site boundaries.

**8.5.5** Where appropriate, the provision of new allotments or other food growing space, alongside the provision of other private, semi-private and public open spaces, will be supported if opportunities arise as part of new developments.

## 8.6 Telecommunications

### Why we are reviewing this policy area

There is no existing local policy relating to telecommunications. However, the NPPF states that Local Plans should support the expansion of electronic communication networks, including telecommunications and high speed broadband. Numbers of radio and telecommunication masts as well as sites used for such installations should be kept to a minimum consistent with the efficient operation of the network. Therefore, in light of the national guidance, there is a need for a local policy on telecommunications infrastructure.

### What the evidence says

The majority of works relating to the installation, alteration or replacement of telecommunications infrastructure in this borough is carried out under permitted development rights.

However, the provision of new infrastructure, including masts and road side cabinets, could be harmful to the character of an area and they have the potential to contribute to street clutter and impact visual amenity.

The Council has adopted a Telecommunications SPD, which is used to assess applications.

### Existing Statement - Telecommunications

All applications for telecommunications apparatus will be considered in accordance with PPG 8 Telecommunications and any other relevant present or subsequent national planning policy guidance.

#### New Policy LP 33

##### Telecommunications

The Council will promote the enhanced connectivity of the borough through supporting infrastructure for high speed broadband and telecommunications.

Applications for telecommunications development (including for prior approval under Part 16 of the General Permitted Development Order, or any other such future Order) will be considered in accordance with national policy and guidance and the following:

1. The applicant will need to submit evidence to demonstrate that all options for sharing of existing equipment, including with other operators, and erecting masts on existing tall buildings or structures, have been fully explored before considering the erection of new structures or facilities.
2. Visual impacts of telecommunications proposals should be minimised, in line with policies on Local Character and Design, particularly on roof tops.
3. The applicant has demonstrated that the development will operate within the International Commission on Non-Ionizing Radiation Protection Guidelines for public exposure.

**8.6.1** National policy sets out guidance on the provision of high quality communications infrastructure, which is essential for sustainable economic growth. Modern telecommunications systems are an essential component in today's economy. High speed broadband technology will also enhance the provision of local community facilities and services. Therefore, the Council supports telecommunications infrastructure and high speed broadband that ensures the continued economic and social success of the borough, particularly as businesses and local communities rely on

access to modern technology. This policy seeks to ensure that new telecommunications infrastructure is sited appropriately and that the number of sites used is minimised where possible.

**8.6.2** It is important to keep the number of masts and sites to a minimum as an over-concentration of equipment and installations can have harmful impacts on the borough's unique and distinctive character. Therefore, there is an expectation that existing masts, buildings and other structures are used wherever possible, which includes sharing facilities with other operators, unless the need for a new site has been justified and accepted by the Council. Where new sites or structures are required, equipment should be sympathetically designed and camouflaged where possible. In addition, the Council supports the removal of redundant telecommunications infrastructure.

**8.6.3** Applications for telecommunications development (including for prior approval under Part 24 of the General permitted Development Order) should have the necessary evidence to justify the proposed development. This includes:

- The outcome of consultation with organisations with an interest in the proposed development (e.g. if a mast is to be installed near a school);
- For an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure of the development will not exceed International Commission on Non-Ionising Radiation Protection guidelines;
- For a new mast or base station, evidence the applicant has examined erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

# Housing 9

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## 9 Housing

### 9.1 New Housing

#### Why we are reviewing this policy area

There continues to be a need for an overarching policy on the approach to housing delivery across the borough.

#### What the evidence says

The Council's housing target is set in the London Plan which the Council is required to seek to augment. The draft Borough SHMA identifies the more detailed housing needs for the borough.

#### Existing Policy CP14 - Housing (part extracts)

##### Housing Targets

**14.A The Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Development Framework policies. The Borough's targets are:**

- **For the ten year period between 1 April 2007 and 31 March 2017, an additional 2,700 dwellings (Alterations to the London Plan, Dec 2006), annualised as 270 dwellings per year.**
- **In the ten years from March 2017, indicative capacity is expected to be in the range of 150-330 dwellings a year. An early alteration to the target contained in this strategy will**

**be brought forward to reflect the updated London wide Housing Capacity Study /SHLAA.**

**14.B The following amounts of housing are indicative ranges in these broad areas of the borough to 2017:**

Area	Approx No of units* (net. inc in units, larger sites + an allowance for small sites, to nearest 100)
Richmond (Ham, Petersham & Richmond Riverside)	700-1100
Twickenham (Twickenham Riverside, St Margarets & N. Twickenham, S. Twickenham, .Twickenham)	700-1100
Teddington & the Hamptons (Hampton North, Hampton, Fulwell & Hampton Hill, Teddington, Hampton Wick)	700-800
Whitton (Whitton, Heathfield)	400
East Sheen	300

(East Sheen, Mortlake + Barnes Common, Barnes)	
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\* Based on Local Housing Availability Assessment 2008, large sites over 10 units gross + an allowance for small sites, there will be approx 1, 700 units on smaller sites, locations not yet known.

### **Housing Standards & Types**

**14.D The density of residential proposals should take into account the need to achieve the maximum intensity of use compatible with local context, while respecting the quality, character and amenity of established neighbourhoods and environmental and ecological policies. The London Plan consolidated with Alterations since 2004 Density Matrix and other policies will be taken into account to assess the density of proposals.**

## **New Policy LP 34**

### **New Housing**

A. The Borough's target is 3,150 homes for the period 2015-2025. This target will be rolled forward until it is replaced by a revised London Plan target. The Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies.

B. The following amounts of housing are indicative ranges in these broad areas of the borough to 2025:

Area	Wards	Approx. No of units
Richmond	Ham, Petersham and Richmond Riverside; South Richmond; North Richmond; Kew	1000-1050
Twickenham	Twickenham Riverside; St Margarets and North Twickenham; South Twickenham; West Twickenham	1000-1050
Teddington and the Hamptons	Hampton North; Hampton; Fulwell and Hampton Hill; Teddington; Hampton Wick	650-700
East Sheen	East Sheen; Mortlake and Barnes Common; Barnes	400-500
Whitton	Whitton; Heathfield	100

**9.1.1** The Further Alterations to the London Plan (FALP) confirmed in the published London Plan 2015 a target of 3,150 homes for 2015-2025 for the borough equating to 315 homes per annum. Boroughs are required to seek to augment targets to address need. The London Plan states this target will be reviewed by 2019/20 and a full review of the London Plan is expected to commence in 2016/17.

**9.1.2** The strategic dwelling requirement takes account of net housing gain from all sources, including site-specific proposals, large and small sites, conversions and remodelling as well as redevelopment and new build.

**9.1.3** A housing trajectory is set out in the annual Authority's Monitoring Report to demonstrate delivery against the London Plan target. This is required by the NPPF and identifies and updates annually a supply of specific deliverable sites sufficient to provide five years worth of housing. This is assessed against the housing requirements together with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.



**9.1.4** As at 1 April 2015 the housing land supply in the borough potentially provides for 2154 units over the next five years which is 579 units more than the target supply in the London Plan, and another potential 1875 units in years six to ten. The borough is therefore on course to meet and exceed the strategic dwelling requirement. This is reflected in the broad expected pattern of future housing land supply set out in the policy. The site allocations as set out within this Plan will contribute to this delivery.

**9.1.5** The draft Borough SHMA concludes that the unconstrained demographic-based need for housing in the borough is for around 895 - 915 dwellings per annum in the 2014 - 33 period - linked to the GLA 10 year migration period. This is at the bottom end of the range identified by the demographic projections but is consistent with past trends in population growth. In reality, taking account of limited land supply it is expected growth will be lower. In accordance with national guidance, Local Plans should provide land to meet those needs in full, insofar as their areas have the sustainable capacity to so, as defined by other policies and having regard to constraints.

**9.1.6** The borough is characterised by large areas of protected open land and constraints such as flood risk, and the remaining area is built up, much of it being within designated conservation areas. As such there are few large potential housing sites available and there is pressure on land for other key uses including schools and employment to support the achievement of sustainable communities. The Council will encourage higher density development in more sustainable locations, such as main centres and areas better served by public transport, subject to compatibility with established character. Development should optimise housing provision for different types of location within the relevant density range taking into account the London Plan Density Matrix. This guidance, along with local factors, such as proximity to facilities and to public transport routes, and the character of the surrounding area, will be taken into account in reaching the appropriate density for a particular site. Policy LP 1 in 4.1 'Local Character and Design Quality' and policy LP 2 in 4.2 'Building Heights' provide further guidance on achieving higher densities taking account of local townscapes and landscapes. These are supported by a number of

housing and design/character related SPDs. Some additional housing will also be provided through conversions and through change of use to housing from other uses where this would not conflict with other policies.

**9.1.7** Proposals should optimise the potential of sites. The majority of housing delivery in the borough is expected to be on previously developed land. Even some cleared sites within the borough generally have a former use, while the majority of open land within the borough that would be regarded as greenfield is covered by protective designations and thus other policies in this Plan would prevent building on greenfield sites.

**9.1.8** There is a need to retain land in employment use, as set out in policy LP 40 in 10.1 'Employment and Local Economy', and the draft Borough SHMA takes into account the likely level of housing need to meet job growth forecasts. Housing delivery against the borough target is capable of being met without the release of employment land, although there is potential for housing gain on employment land through mixed use schemes which retain or enhance the level of existing employment floorspace.

**9.1.9** The Housing and Planning Act 2016 introduced a requirement for local authorities to publish a statutory brownfield register and the Government will establish a new delivery test on local authorities. These are intended to maximise the use of brownfield land and ensure delivery against the number of homes set out in Local Plans. These tools are expected to be relevant to the implementation and delivery of this policy.

### 9.2 Housing Mix and Standards

#### Why we are reviewing this policy area

There continues to be a need for policy and guidance on housing mix and standards. This should reflect current national and regional guidance.

**What the evidence says**

The draft Borough SHMA identifies a need for a mix of unit sizes and types. Evidence regarding likely population change points in particular to demand from families for housing in the borough.

The London-wide need and viability evidence supports the application of the Nationally Described Space Standard and the national higher standards for inclusive access. The draft Borough SHMA also identifies that households with mobility problems and/or a physical disability can be expected to grow, in particular driven by the growing older population.

**Existing Policy CP14 - Housing (part extract)****Housing Standards & Types**

**14.E All housing should be built to Lifetime Homes standards and 10% of all new housing should be to wheelchair standards. The private sector element of any development will include an appropriate number of small (1-bed) units, depending on location. This would be at least 25%, rising to the great majority (at least 75%) in more sustainable locations, such as town centres and other areas with high public transport accessibility and with good access to facilities.**

**Existing Policy 12****Existing Policy DM HO 4 - Housing Mix and Standards**

Development should generally provide family sized accommodation, except within town centres where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the location.

All new housing development, including conversions, are required to comply with external and internal space standards.

The Council will only grant planning permission for new dwellings that provide adequate internal space and appropriate external private and/or communal amenity space to meet the needs generated by the development. Development must take account of accessible design as required by Policy CP14.

Amenity space for all new dwellings should be:

- private, usable, functional and safe;
- easily accessible from living areas;
- orientated to take account of need for sunlight and shading;
- of a sufficient size to meet the needs of the likely number of occupiers;
- accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space.

In areas of poor housing environment the Council will seek appropriate improvements by tree planting, provision of open space and play space, when opportunities arise.

### Existing Policy 13

#### Existing Policy DM DC 6 - Balconies and Upper Floor Terraces

Purpose built, well designed and positioned balconies or terraces are encouraged where new residential units are on upper floors. They should be:

- sufficiently deep to allow adequate access and circulation around furniture.
- preferably located next to a dining or living space
- preferably receive direct sunlight
- designed to provide some shelter and privacy to neighbouring properties, either by using screens or by setting the balcony back within the façade
- balustrades designed to screen stored items from view
- designed for security and safety

The addition of balconies and upper floor terraces to existing properties will not generally be permitted unless the above apply and they do not adversely affect neighbourliness (see Neighbourliness, Sunlighting and Daylighting).

### New Policy LP 35

#### Housing Mix and Standards

A. Development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the location.

B. All new housing development, including conversions, are required to comply with the Nationally Described Space Standard.

C. All new housing development, including conversions, are required to comply with the Council's external space standards. For houses a minimum total private space of 70sqm for 3 or more beds and 40sqm for 2 beds should be provided. To provide adequate private amenity space for flats, a minimum of 5sqm of private outdoor space for 1-2 person dwellings should be provided and an extra 1sqm should be provided for each additional occupant. Purpose built, well designed and positioned balconies or terraces are encouraged where new residential units are on upper floors, if they comply with policy LP8 Amenity and Living Conditions.

D. Amenity space for all new dwellings, including conversions, should be:

- a. private, usable, functional and safe;
- b. easily accessible from living areas;
- c. orientated to take account of need for sunlight and shading;
- d. of a sufficient size to meet the needs of the likely number of occupiers; and
- e. accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space.

E. 90% of all new build housing is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% of all new build housing is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings'.

**9.2.1** In order to provide for the needs of the borough's future population whilst retaining the character of established residential areas new development should provide family sized accommodation. This will provide for a range of family needs and single person households who need

accommodation for visitors or home-working. There are an increasing proportion of one person households and on appropriate sites an element of small units (1 bedroom or studios) will also be required. A mix is expected to accommodate the needs of both young and old people, including options for downsizing.

**9.2.2** The draft Borough SHMA supports this approach, finding that an overall mix of market housing should be delivered, including family housing and options for older households to downsize (which can then release existing larger family homes for other households). The appropriate mix should be considered on a site by site basis having regard to its location, the existing stock in the locality and the character of an area and take account of existing infrastructure capacity such as schools and transport.

**9.2.3** Housing standards for internal and external space and inclusive access apply to all tenures. The appropriate mix for affordable housing is set out in policy LP 36 in 9.3 'Affordable Housing'.

**9.2.4** It is recognised that adequate space in the home has an effect on health, diversity and community cohesion and that insufficient space provision in the housing stock will therefore impact on local services. It is an important issue in the borough given the scarcity of housing land supply and particularly to prevent sub-standard accommodation in small units. It is important to make efficient use of land and cater for changing lifestyles, including home working, and accord with requirements for inclusive access.

**9.2.5** The Council has therefore adopted the Nationally Described Space Standard and the optional higher Building Regulations Part M for inclusive access.

**9.2.6** The Nationally Described Space Standard sets a minimum ceiling height of 2.3 meters for at least 75% of the gross internal area of the dwelling. Following the approach set in the London Plan to address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of

2.5m for at least 75% of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.

**9.2.7** Unlike the other standards in this policy, Part M of the Building Regulations generally does not apply to dwellings resulting from a conversion or a change of use.

**9.2.8** The Building Regulations M4 (2) and M4 (3) require step free access. In non-lift serviced multi-storey development where step free access is not viable, assessments should be submitted to demonstrate that the inclusion of a lift would make the scheme unviable or mean that service charges are not affordable for intended residents. If this is satisfactorily evidenced, then the units above or below the ground floor that cannot provide step free access would only need to satisfy the requirements of M4(1) of the Building Regulations.

**9.2.9** Part M4 (3) of the Building Regulations regarding 'wheelchair user dwellings' distinguishes between 'wheelchair accessible' (a home readily useable by a wheelchair user at the point of completion) and 'wheelchair adaptable' (a home that can be easily adapted to meet the needs of a household including wheelchair users). M4 (3) wheelchair 'accessible' should only be applied where the local authority is responsible for allocating or nominating a person to live in that dwelling.

**9.2.10** Where developments are not able to meet policy requirements for housing mix and standards, the applicant should identify the shortcomings and demonstrate reasons why, including that suitable alternative layouts or provision such as alternative amenity space in the form of roof terraces, roof gardens and balconies (in accordance with policy LP 8 in 4.8 'Amenity and Living Conditions') have been considered and incorporated wherever possible.

**9.2.11** For amenity space, while front garden or courtyard space can contribute to the overall quantum, this should generally not form a significant proportion of the provision unless it can be demonstrated that it meets the tests set out in the above policy particularly that it can be considered functional and safe.

**9.2.12** The Residential Development Standards SPD will be updated to provide further guidance.

### 9.3 Affordable Housing

#### Why we are reviewing this policy area

The ability to provide sufficient affordable housing in the borough continues to be a challenge. The policy is updated to take account of local priority housing needs and the changing context for funding affordable housing.

#### What the evidence says

The draft Borough SHMA identifies up to date needs for affordable housing which justify seeking to secure additional affordable housing. The Authority's Monitoring Report identifies the reliance on small sites contributions to meet affordable housing policy objectives. The strategic target of 50% of overall supply has regard to development viability and the need to deliver balanced communities with a mixture of tenures and dwelling types.

The Council is in the process of assessing the implications of the Housing and Planning Act 2016 and forthcoming Regulations.

#### Existing Policy CP15 - Affordable Housing

15.A Housing provision is expected to include a range of housing to meet the needs of all types of households.

Over the LDF period the Council:

- i. expects 50% of all new units will be affordable housing, with a tenure mix of 40% housing for social rent and 10% intermediate housing.
- ii. expects that the affordable housing mix should reflect the need for larger social rented family units and the Sub-Regional Investment Framework requirements.

The Council will seek to bring forward affordable housing through development of new units, purchase of property in or outside the borough and through rent deposit schemes.

15.B Some form of contribution towards affordable housing will be expected on all new housing sites. The contribution towards affordable housing on sites involving new-build housing will be as follows:

- i. on sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development. The amount involved will be set out in the Development DPD and will be reviewed annually.
- ii. on sites capable of ten or more units gross, at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.



## Existing Policy 14

### Existing Policy DM HO 6 - Delivering Affordable Housing

The Council will seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes, having regard to the strategic borough-wide target and the individual circumstances of the site, in accordance with Policy CP15.

On sites capable of less than 10 units gross, a financial contribution to the Affordable Housing Fund commensurate with the scale of development will be required:

No of units	% Affordable Housing	AH Homes
<b>9 units</b>	<b>45%</b>	<b>4.05</b>
<b>8 units</b>	<b>40%</b>	<b>3.20</b>
<b>7 units</b>	<b>35%</b>	<b>2.45</b>
<b>6 units</b>	<b>30%</b>	<b>1.8</b>
<b>5 units</b>	<b>25%</b>	<b>1.25</b>
<b>4 units</b>	<b>20%</b>	<b>0.8</b>
<b>3 units</b>	<b>15%</b>	<b>0.45</b>
<b>2 units</b>	<b>10%</b>	<b>0.20</b>
<b>1 unit</b>	<b>5%</b>	<b>0.05</b>

The level of the contribution required will be based on the difference between the gross development value of the whole scheme as a market scheme and the equivalent as an affordable housing scheme, divided by the number of homes in the scheme, to give the subsidy per home, that will be multiplied by the number of AH Homes relating to the size of the scheme as set out above.

As outlined in Core Strategy Section 7.2 Costs and Viability, in considering proposals or financial contributions, the Council will have regard to:

- economic viability;
- individual site costs;
- the availability of public subsidy; and
- the overall mix of uses and other planning benefits.

## New Policy LP 36

### Affordable Housing

A. The Council expects:

- 50% of all housing units will be affordable housing, with a tenure mix of 40% housing for rent and 10% intermediate housing.
- the affordable housing mix should reflect the need for larger rented family units and the Council's guidance on tenure and affordability, based on engagement with a Registered Provider to maximise delivery.

Where on-site provision is required, an application should be accompanied by evidence of meaningful discussions with a Registered Provider which have informed the proposed tenure, size of units and design to address local priorities and explored funding opportunities.

B. A contribution towards affordable housing will be expected on all housing sites:

- a. on sites capable of ten or more units gross and all former employment sites, at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.
- b. on sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out below and in the Affordable Housing SPD.

No. of units proposed (gross)	% Affordable Housing		
	For conversions and reversions (where there is no loss of former employment floorspace.	For new build development or redevelopment (where there is no loss of former employment floorspace)	For any units replacing employment floorspace
9 units	36%	45%	90%
8 units	32%	40%	80%
7 units	28%	35%	70%
6 units	24%	30%	60%
5 units	20%	25%	50%
4 units	16%	20%	40%
3 units	12%	15%	30%
2 units	8%	10%	20%

No. of units proposed (gross)	% Affordable Housing		
1 unit	4%	5%	10%

C. The Council will seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. The Council will have regard to:

- a. economic viability;
- b. individual site costs;
- c. the availability of public subsidy; and
- d. the overall mix of uses and other planning benefits.

D. Where a reduction to an affordable housing contribution is sought on economic viability grounds, developers should provide a development appraisal to demonstrate that schemes are maximising affordable housing. The developer will be required to underwrite the costs of a Council commissioned economic viability assessment. The Council will rigorously evaluate such appraisals and:

- a. assess if the maximum reasonable amount of affordable housing is based on delivering the appropriate tenure, unit sizes and types that address local needs.
- b. consider whether it is necessary to secure provision for re-appraising the viability of a scheme prior to implementation to secure contingent obligations.
- c. in most circumstances the Existing Use Value plus a premium (EUV+) approach to assessing benchmark land value in development appraisals and viability assessments should form the primary basis for determining the benchmark land value.

**9.3.1** The borough has one of the highest average house prices in the UK, and a continuing need for affordable housing, particularly for family homes. In the period from 2014 to 2033 a net deficit of 906 affordable homes per annum is identified in the draft Borough SHMA, demonstrating the need for affordable homes remains substantial and justifies the continued policy approach. In the context of the borough small sites make a significant contribution to housing supply and the cumulative impact of these sites should contribute to affordable housing provision, justified by the evidence base and local circumstances.

**9.3.2** The policy applies to all new housing development, including changes of use for wholly residential and mixed use sites incorporating residential use, where planning permission is required. The affordable housing provision (on-site or off-site) or any financial contribution should be calculated in relation to gross rather than net development i.e. it should be based on the total number of units proposed in the final development. The mechanism for assessing the contributions from individual sites is set out in the Affordable Housing SPD, for each proposal to make an adequate contribution towards affordable housing which is directly, fairly and reasonably related in scale and kind to the development proposed. It is considered necessary to make it acceptable in planning terms, and the absence of an obligation will be considered as undermining the Council's housing strategy and harm the provision of affordable housing in the area.

**9.3.3** The Council's Housing Strategy 2013-17 sets out the Council's housing priorities, recognising the commitment to ensure the more vulnerable people of the borough are protected. This demonstrates local needs and recognises the importance of delivering houses for rent in the borough and working within the challenges specific to the borough with particular concerns over affordability. The Council's Tenancy Strategy and Intermediate Housing Policy Statement set out guidance which should inform the provision of affordable housing. Affordable housing should be designed to the same high quality and sustainability standards as private housing (see policy LP 35 in 9.2 'Housing Mix and Standards').

**9.3.4** The Council will expect all developers to ensure that they identify and get the Council's approval of a Registered Provider to support the delivery of affordable housing on site at the time of submission of a planning application and any associated financial appraisal. In this way negotiations on viability will include the resources available to the Registered Provider to be taken into account early in the planning process. It is expected that any viability appraisal will need to demonstrate how affordable housing is being maximised (on all large sites and all former employment sites) with Registered Providers optimising their use of all resources including borrowing and grant as and when it is available and being included in design discussions. Evidence of these discussions with Registered Providers is required to be submitted with an application, as set out in the Local Validation Checklist.

**9.3.5** The GLA's Affordable Housing Development Control Toolkit or a similar model should be used in presenting any viability evidence for a scheme involving affordable housing, if it is not in accordance with the Council's policy. Full public disclosure of financial information should be expected to inform transparent decision-making.

**9.3.6** Where affordable housing involves dwellings with larger numbers of habitable rooms per dwelling, or different sizes of habitable rooms with different tenures, it may be more appropriate for the calculation of the affordable housing proportion to be in terms of habitable rooms or floor space.

**9.3.7** The threshold is expressed in terms of the capability of the site, in order to overcome attempts to evade thresholds. For example, these could be by lowering densities, providing unit sizes significantly above the Nationally Described Space Standards, failing to provide the required mix of units, phasing development, submitting subsequent applications on the same site or adjoining sites, or by incremental acquisition of sites. In these circumstances the Council would apply the affordable housing policy requirements.

**9.3.8** The Affordable Housing SPD sets out further details of the methodology for calculating the financial contribution from small sites. The amount is proportionate to the strategic borough-wide target but applies a sliding scale that decreases with a decrease in total number of units proposed (for small site conversions below normal policy requirements and for former employment small sites above normal policy requirements). This has been set out to clearly suggest a reasonable starting point for negotiations. The amount reflects local values and takes account of other development costs. The focus is on achieving financial neutrality in terms of on or off-site provision and contributions will only be spent on affordable housing that would be in addition to affordable housing that would be provided anyway. The principle is to capture the difference which the developer would have put in, had the scheme been entirely for affordable housing, applied to the sliding scale of contributions sought related to the size and type of the scheme.

**9.3.9** Policy LP 40 in 10.1 'Employment and Local Economy' seeks to retain employment floorspace and does not wish to encourage the change of use of employment sites to potentially higher value residential uses. In those exceptional circumstances where the Council agrees a change of use, the lower Existing Use Value of employment land means that any residential development involving a loss of employment floorspace is required to increase affordable housing above the normal policy requirements for new build development or redevelopment. As a public benefit this would compensate for the loss of employment where it has already been agreed by the Council that on-site affordable housing is not suitable. The rate for conversion/reversions is adjusted to acknowledge the difference between new-build and conversion/reversion schemes.

**9.3.10** Contributions will be secured via a Planning Obligation. Financial contributions made to the ring-fenced Affordable Housing Fund are allocated to the Council's Housing Capital Programme and used to help fund new affordable housing, or to fund acquisition of land and private properties for this purpose, or for enhanced provision through re-modelling existing affordable units or supported schemes, in pursuance of housing

and planning objectives. The financial contribution will not be converted into the actual delivery of units on an identified linked site, unless suitable, as it is vital that affordable housing is delivered in the most effective way.

**9.3.11** The cost of affordable housing policy requirements should be factored into negotiations on land values. The onus will be on developers to pay for any viability assessment if the proposal is not policy compliant and any cost of independent assessment. The Council will only consider reducing planning obligations if fully justified through a financial appraisal model or evidence, informed by engagement with a Registered Provider. This will be the exception rather than the rule. The Council will expect this contribution in addition to any other requirements under CIL and as set out in the Planning Obligations Strategy SPD. Recent viability testing for the borough CIL took account of affordable housing policy requirements and a whole plan viability assessment for the Local Plan Review will be undertaken in due course.

**9.3.12** In respect of schemes presently anticipated to deliver low levels of affordable housing below policy requirements, where there is dispute about values and to take account of economic uncertainties, mechanisms will be sought to allow for a future review to take account of the values of the site at key stages in the development and when completed (as appropriate). This could result in a higher affordable housing contribution, first assessing in the form of additional units on-site or an off-site financial contribution where it is demonstrated this is not practicable.

### **Starter Homes**

**9.3.13** The Housing and Planning Act 2016 introduced a duty on local planning authorities to promote Starter Homes and proposed changes to the NPPF are likely to include Starter Homes within the definition of affordable housing. In large parts of the borough homes at 80% of the market price are unlikely to be below the indicated threshold of £450,000 (at 80% of market value) applicable to Greater London and therefore undeliverable. Furthermore, Starter Homes at 80% of market price would not be affordable for low income households in the borough. An approach to Starter Homes in London needs to take account of affordability and

viability. The local evidence from the Richmond Housing Register is that the income and/or deposit needed to access a Starter Home would render it unaffordable for the vast majority of people with an interest in securing low cost home ownership housing. Low cost home ownership options would only be acceptable as part of a mix with rented affordable homes, having regard to local needs and involvement of Registered Providers to secure products in perpetuity.

#### 9.4 Housing Needs of Different Groups

##### Why we are reviewing this policy area

The policy needs to be updated to reflect the latest national and regional guidance on housing needs of different groups including for older people, supported housing, student housing, Custom and Self-Build, and Gypsies and Travellers.

##### What the evidence says

The draft Borough SHMA and the Council's research on specific groups identifies the need to plan for a mix of housing to address local needs. The Council is updating research on commissioning and delivery of a range of accommodation options for older people and will be assessing accommodation needs arising from the Children and Social Work Bill, amongst other local priorities.

#### Existing Policy 15

##### Existing Policy CP 14 - Housing (part extract)

**14.C Residential proposals will be assessed for the contribution to meeting housing need for all sections of the community. The London wide Gypsy and Traveller Accommodation Assessment has identified a need for a further 2-11 pitches in the Borough. The shortage and cost of land mean that there will be limited opportunities for gypsy and traveller accommodation in addition to the existing site which will be protected. The Borough will work with partners, RSLs, developers and neighbouring Authorities to seek to meet identified need. Site/s will be allocated as part of the Site Allocations Development Plan Document.**

**Sites for temporary or permanent use should meet the following criteria:**

- 1. The site can provide for a satisfactory arrangement of pitches, permanent buildings and open space;**
- 2. The use of the site would have no significant adverse effect on the amenity of occupiers of adjoining land;**
- 3. The use of the site would be acceptable in terms of the visual amenity and;**
- 4. The use could be supported by adequate social infrastructure in the locality.**

##### Existing Policy DM HO5 - Housing to Meet Specific Community Needs

The loss of existing housing will be resisted where it meets identified specific community needs, unless it can be shown that:



- the accommodation is no longer needed, or
- that the existing accommodation will be adequately re-provided to an equivalent or greater standard in a different way or elsewhere, or
- the new accommodation will instead meet another identified priority local need.

Planning permission will be granted for new accommodation where housing is providing for an identified local need, across a range of tenures, providing they are on a site and in a location suitable for that particular use, and in accordance with other environmental, transport, parking and other relevant policies.

#### New Policy LP 37

##### Housing Needs of Different Groups

A. The loss of existing housing will be resisted where it meets identified specific community needs, unless it can be shown that:

- the accommodation is no longer needed, or
- that the existing accommodation will be adequately re-provided to an equivalent or greater standard in a different way or elsewhere, or
- the new accommodation will instead meet another identified priority local need.

B. Planning permission will be granted for new accommodation where housing is providing for an identified local need, across a range of tenures, providing they are on a site and in a location suitable for that particular use, and in accordance with environmental, transport, parking and other relevant policies.

C. The existing Traveller site at Bishops Grove, Hampton will be protected. Sites for temporary or permanent use for Gypsies and Travellers should meet the following criteria:

1. The site can provide for a satisfactory arrangement of pitches, permanent buildings and open space;
2. The use of the site would have no significant adverse effect on the amenity of occupiers of adjoining land;
3. The use of the site would be acceptable in terms of visual amenity and;
4. The use could be supported by adequate social infrastructure in the locality, including access to education and health services.

**9.4.1** Different types of accommodation are recognised as important in the borough, particularly to provide affordable options and meet the needs of residents who may otherwise have difficulty finding alternative accommodation. Existing accommodation needs to be protected given the constraints of land supply and new accommodation encouraged recognising affordability issues in the borough. The limited land supply means that new developments must be directed at identified priority local needs.

**9.4.2** The range of housing to meet specific community needs can include sheltered housing with care support, staffed hostels, residential care homes/nursing homes, extra-care housing, provision by local colleges, hotels and other institutions for their students and/or staff. These include supported housing provision for children, older persons and other client groups.

**9.4.3** Local need should be identified on the basis of up to date evidence and related to the Council's housing and associated strategies, including specific reviews concerning supported housing for specific client groups, or other relevant strategies.

**9.4.4** The Housing Strategy 2013-17 sets out the key role of supported housing. The Council undertook a Supported Accommodation review in 2010 which recognised the need to increase the in-borough provision for those who require supported accommodation across a range of service areas. In alignment with the Valuing People guidance and the Council's own Commissioning Strategy there is an identified need to remodel some existing residential care services and expand the range of supported living options that are available in the borough.

**9.4.5** The Older Peoples Supported Accommodation Review (2008) identified: no additional requirements for 'residential care' in the borough; there are adequate premises with nursing care; and adequate affordable social sheltered accommodation.

**9.4.6** 'Extra Care' housing provides self-contained accommodation with care available on site. The Council's Extra Care Housing Evidence Base (2015) suggests there is an estimated need for at least an additional 81 extra care units in the borough provided across two to three areas in the period 2015 to 2020.

**9.4.7** Further work on the strategic approach to future commissioning and delivery of accommodation options for older people is underway including a review of the need for sheltered/retirement housing (due to be published by Autumn 2016).

**9.4.8** Current housing priorities include:

- remodelling of older peoples sheltered accommodation to provide self contained units;
- extra care housing which in some cases can be created from remodelling existing sheltered accommodation;

- private sheltered and extra care accommodation (but this would be a lower priority than affordable housing);
- supporting the PLD valuing people agenda to provide greater choice in supported housing options;
- student accommodation to meet needs of institutions within the borough (but this would be a lower priority than affordable and supported housing priorities).

**9.4.9** However as identified in the draft Borough SHMA the need for affordable homes remains substantial and is therefore a higher priority to those identified above. Where proposed residential provision does not itself meet the NPPF definition of affordable housing, affordable housing policy requirements will be applicable to site proposals for accommodation considered under this policy and it is expected that schemes will be designed to accommodate affordable housing alongside other types of housing for specific groups.

**9.4.10** The initial outcome of the Council's research on Gypsies and Travellers in 2013 and 2015 (report published in 2016) suggests that there is no demonstrated need for additional pitches; although there is a need to protect the existing site. There may be opportunities for other innovative solutions to improve support to address needs such as providing floating support to those in bricks and mortar to address issues of isolation, managing a home and maintaining a tenancy.

**9.4.11** The Private Rented Sector (PRS) can assist in meeting a range of needs and be particularly suitable for certain locations. It can for example offer longer term tenancies/more certainty over long term availability and ensure effective management through single ownership. Any PRS schemes are strongly encouraged to sign up to the London Rental Standard. Wholly PRS proposals are unlikely to be supported where they do not contribute to the higher priority need for affordable housing.

**9.4.12** Student housing will only be supported where it meets demonstrable local need and does not compromise capacity for conventional homes or undermine policies to secure mixed and balanced communities. It must not prejudice the supply of affordable housing and

other priority supported housing. It should be brought forward in conjunction with an existing local institution and demonstrate that the proposed design will meet their needs, including details on affordability. The future strategy for St Mary's University proposes growth to increase the number of students and any residential uses proposed should form part of a wider accommodation strategy taking account of capacity and infrastructure.

**9.4.13** Strategies produced by third parties demonstrating local need should have been subject to consultation with appropriate bodies or verification to demonstrate the robustness of the evidence to the Council. The type of accommodation proposed for any site must be kept under regular review and not assumed to have stayed the same, as communities needs can change within a short time period. Evidence will be considered in light of the Council's research and strategic priorities. If there is no evidential need arising within the borough, other priorities should be addressed and the capacity for conventional housing should not be compromised. Limited land means that development to accommodate needs arising from outside the borough will not generally be supported.

**9.4.14** Provision is encouraged in accessible locations and integrated within communities.

**9.4.15** High quality design standards, relevant to client needs, will be expected, including inclusive design and provision of internal and external space. For example older peoples accommodation should address specific needs such as storage of electric buggies in dry locations, increasing wheelchair housing and turning circles for day centre buses.

#### Custom and Self Build

**9.4.16** The Government wants to enable more people to build or commission their own home and wants to make this form of housing a mainstream housing option. The requirement for the Council to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in their area came into effect in April 2016 and while the Council's Register is live there is not yet comprehensive information on demand. Other sources suggest a level of demand in the

borough, and while they could form part of the overall housing mix there is limited land supply, high land values and other priority land uses which may need to be considered in particular to optimise overall housing delivery. Demand will be a consideration in the Council's planning, housing, land disposal and regeneration functions.

### 9.5 Loss of Housing

#### Why we are reviewing this policy area

The need to protect existing housing continues to be relevant.

#### What the evidence says

The Authority's Monitoring Report identifies that in some parts of the borough the loss of existing dwellings has been increasing. Although the strategic dwelling requirement is being met there is a need to prevent losses which have a cumulative impact from even small sites.

#### Existing Policy DM HO1 - Existing Housing (including conversions, reversions and non self-contained accommodation)

Existing housing should be retained. Redevelopment of existing housing should normally only take place where:

1. it has first been demonstrated that the existing housing is incapable of improvement or conversion to a satisfactory standard to provide an equivalent scheme; and if this is the case:
2. the proposal improves the long-term sustainability of buildings on the site; and

3. the proposal does not have an adverse impact on local character; and
4. the proposal provides a reasonable standard of accommodation, including accessible design, as set out in Policy DM HO 4 'Housing Mix and Standards' and other policies.

### New Policy LP 38

#### Loss of Housing

- A. Existing housing should be retained.
- B. Proposals for reversions and conversions should assess the suitability of the property and design considerations.
- C. Redevelopment of existing housing should normally only take place where:
  - a. it has first been demonstrated that the existing housing is incapable of improvement or conversion to a satisfactory standard to provide an equivalent scheme; and, if this is the case
  - b. the proposal does not have an adverse impact on local character; and
  - c. the proposal provides a reasonable standard of accommodation, including accessible design, as set out in LP 35 Housing Mix and Standards.

**9.5.1** Existing housing is valued in the borough due to the constraints of limited land supply and high land values. The housing targets for the Council will be challenging to achieve and any loss of existing units exacerbates this.

**9.5.2** The policy is aimed at individual smaller sites, rather than large scale remodelling.

**9.5.3** There is a presumption for the applicant to first assess the potential for retaining and refurbishing existing buildings. There should be full consideration as to whether existing housing can be improved or converted to a satisfactory standard. Proposals for redevelopment will be assessed for benefits on the balance of the quality of housing provision particularly in respect of design and amenity considerations and the impact on character and the streetscene, informed by the Council's Village Planning Guidance SPDs.

**9.5.4** There is a presumption against the loss of housing units but exceptions may be considered if other policy priorities are met and wider benefits provided such as an increase in employment uses, affordable housing or housing to meet identified community needs, provision of health facilities, or infrastructure.

**9.5.5** It is recognised that Registered Providers are subject to complex financial regulations and have to address specific needs. Therefore exceptions to policy will be considered in cases where conversions, reversions or redevelopment will result in affordable units being retained and managed as affordable housing by a Registered Provider or similar body, in furtherance of the Council's Housing and related Strategies.

**9.5.6** Reversions of houses converted into flats back into a single family dwelling house may be considered acceptable if the property was originally a single family dwelling house and it can be demonstrated the loss of units will be outweighed by environmental, street scene, transport or parking benefits which could not be easily achieved without the reversion. Evidence of tangible benefits is required from an applicant to justify an exception on this basis. This can include assessments of sustainability or the poor standards of existing units. A stronger justification for an exception needs to be made where there is a greater loss of existing units.

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**9.5.7** The conversion of larger types of houses to flats can make a contribution to meeting certain housing needs and provides the opportunity to meet the need for small units. However, it must be recognised that only certain types of property are suitable for conversion, and that there are some areas where conversions would be incompatible with the existing character of the area, or lead to unacceptable parking conditions. In considering in principle the suitability of a property for conversion the Council will take into account:

- the size of the property and its physical characteristics, including layout and size of rooms;
- on-street parking conditions and on-street parking restrictions; the adequacy of bus and rail transport;
- the amount of off-street parking which would be appropriate and its location, which must not unduly affect the amenities of adjoining premises or the character of the area;
- the location of the property and the need to protect the established character of existing residential areas, including that of specific roads, as identified in the Council's Village Planning Guidance SPDs;
- the effect on the amenities of adjoining premises;
- the extent to which the property contributes to meeting specific community needs in accordance with policy LP 37 in 9.4 'Housing Needs of Different Groups'.

**9.5.8** In cases where the Council accepts that in principle a property may be suitable for conversion, the design of the conversion will be required to provide a satisfactory standard of accommodation and contribute positively to its surroundings. If a property is considered suitable for conversion, the Council will take account of the following design considerations in assessing the proposal:

- number of units in relation to size of property and layout in accordance with policy LP 35 in 9.2 'Housing Mix and Standards' and the Residential Development Standards SPD;
- level of daylighting and sunlight and avoidance of overlooking in accordance with policy LP 8 in 4.8 'Amenity and Living Conditions';

- mix of unit sizes, and particularly the need to increase the supply of small low cost units for rent and owner-occupation in accordance with policy LP 35 in 9.2 'Housing Mix and Standards';
- access to private amenity space in accordance with policy LP 35 in 9.2 'Housing Mix and Standards' and the Residential Development Standards SPD.

### 9.6 Infill, Backland and Backgarden Development

#### Why we are reviewing this policy area

The need to set out the policy approach to infill development and protect garden land continues to be relevant.

#### What the evidence says

The Authority's Monitoring Report shows that proposals that represent garden development in recent years averages less than 5% of housing completions.

#### Existing Policy DM HO2 - Infill Development

All infill development must reflect the character of the surrounding area and protect the amenity of neighbours. In considering applications for infill development the following factors will be taken into account:

1. Plot width - plots must be sufficient width to allow a dwelling(s) to be sited with adequate separation between dwellings;
2. Spacing between dwelling - new dwellings must have similar spacing between buildings to any established spacing in the street;



3. Height - dwelling height should reflect the height of existing buildings;
4. Materials - where materials on existing dwellings are similar, new dwellings should reflect those materials;
5. Architectural details - new dwellings should incorporate or reflect traditional architectural features;
6. Trees, shrubs and wildlife habitats - features important to character, appearance or wildlife must be retained or re-provided;
7. Impact on neighbours - including loss of privacy to homes or gardens.

### Existing Policy 16

#### Existing Policy DM HO3 - Backland Development

There will be a presumption against loss of back gardens due to the need to maintain local character, amenity space and biodiversity. In exceptional cases where it is considered that a limited scale of backland development may be acceptable it should not have a significantly adverse impact upon the following:

1. Garden land – rear garden land which contributes either individually or as part of a larger swathe of green space to amenity of residents or provides wildlife habitats must be retained;
2. Impact on neighbours – privacy of existing homes and gardens must be maintained and unacceptable light spillage avoided;
3. Vehicular access or car parking – these must not have an adverse impact on neighbours in terms of visual impact, noise or light. Access roads between dwellings and unnecessarily long access roads will not normally be acceptable;

4. Mass and scale of development – development on backland sites must be more intimate in scale and lower than frontage properties;
5. Trees, shrubs and wildlife habitats – features important to character, appearance or wildlife must be retained or re-provided.

### New Policy LP 39

#### Infill, Backland and Backgarden Development

##### Infill and Backland Development

A. All infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. In considering applications for infill and backland development the following factors should be addressed:

1. Retain plots of sufficient width for adequate separation between dwellings;
2. Retain similar spacing between new buildings to any established spacing;
3. Retain appropriate garden space for adjacent dwellings;
4. Respect the local context, in accordance with policy LP 2 Building Heights;
5. Enhance the street frontage (where applicable) taking account of local character;
6. Incorporate or reflect materials and detailing on existing dwellings, in accordance with policy LP 1 Local Character and Design Quality;
7. Retain or re-provide features important to character, appearance or wildlife, in accordance with policy LP 16 Trees and Landscape;

8. Result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens, in accordance with policy LP 8 Amenity and Living Conditions;
9. Provide adequate servicing, recycling and refuse storage as well as cycle parking;
10. Result in no adverse impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking; access roads between dwellings and unnecessarily long access roads will not normally be acceptable.

#### **Backgarden Development**

B. There is a presumption against loss of back gardens due to the need to maintain local character, amenity space and biodiversity. Rear garden land which contributes either individually or as part of a larger swathe of green space to amenity of residents or provides wildlife habitats must be retained. In exceptional cases where it is considered that a limited scale of backgarden development may be acceptable it should not have a significantly adverse impact upon the factors set out above. Development on backgarden sites must be more intimate in scale and lower than frontage properties.

**9.6.1** Infill development is considered as sites within street frontages including the development of a small gap in an otherwise built up frontage. This could be a separate unit or units or an extension to an existing unit or outbuildings, and could include side garden plots. Each site will be assessed as to whether it is considered suitable for development. There is now no automatic presumption that this land is suitable for housing development.

**9.6.2** It is important that infill development reinforces the character of streets by reflecting the scale, mass, height, form, fenestration and architectural details of its neighbours.

**9.6.3** The character of streets has often been weakened by infilling space between dwellings. In considering new infill development the width of the remaining and the new plot should be similar to that prevailing in the immediate area and the established spacing between dwellings, building line and height should be maintained.

**9.6.4** Character is also determined by materials and architectural details and these should reflect existing materials and predominant styles, in accordance with policy LP 1 in 4.1 'Local Character and Design Quality', in the Design Quality Supplementary Planning Document, in various Conservation Area Statements and, where available, studies and the Council's Village Planning Guidance SPDs.

**9.6.5** Most backland development in the borough involves loss of garden land. In general the Council will not accept proposals for developments on backgarden land but proposals for development of backland sites in other uses will be considered subject to the criteria above and other relevant policies.

**9.6.6** The restrictive approach reflects the direct and indirect value of gardens contributing to local character, providing safe and secure amenity and play space, supporting biodiversity, helping to reduce flood risk and mitigating the effects of climate change including the heat island effect.

**9.6.7** Housing delivery from backgarden land is not needed to meet the borough's strategic housing targets. The Council will restrict garden development where gardens make a significant contribution to local character, ecology and/or the general environment. In assessing local ecological value the Council will take into account the length and overall size of the gardens and value of adjacent land as larger areas support a wider range and number of species. Gardens are also important in establishing the character of certain parts of the borough and this is recognised in the Design Quality SPD, in various Conservation Area Statements and, where available, studies and the Council's Village Planning Guidance SPDs. Policy LP 16 in 5.5 'Trees and Landscape' recognises

the value of trees in the borough. However, this consideration will need to be made on a case by case basis. These factors mean that developments that involve a significant loss of garden land will normally be unacceptable.

# Employment and Local Economy 10

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## 10 Employment and Local Economy

### 10.1 Employment and Local Economy

#### Why we are reviewing this policy area

This policy area is in general conformity with the NPPF and London Plan which both encourage local authorities to support a strong local economy. To address the shortage of offices resulting from B1 to C3 permitted development rights and the simultaneous pressure for redevelopment of the borough's limited industrial space, the Council proposes strengthening the overall approach towards employment sites and introducing separate policies for 'Offices' and 'Industrial Land and Business Parks'.

#### What the evidence says

Loss of employment space due to permitted development rights is a major concern; between May 2013 and February 2016, 234 Prior Approvals were approved which, if implemented, would result in a potential loss of 81,978sqm of office floorspace. Article 4 Directions are in place or proposed across certain parts of the borough to remove permitted development rights in order to protect against further loss of this important resource.

The Mayor of London's Land for Industry and Transport SPG (2012) states that the London Borough of Richmond upon Thames should ensure a 'restrictive' approach towards the transfer of industrial land to other uses until 2031. The recently updated GLA evidence base (published March 2016) supports this approach.

#### Existing Policy CP19 - Local Business

A diverse and strong local economy will be supported by:

19.A Retaining land in employment uses for business, industrial or storage.

19.B Requiring development likely to generate significant amounts of travel to be located in areas highly accessible to public transport, with the largest office developments located in Richmond and Twickenham town centres.

19.C Encouraging the provision of small units.

19.D Requiring mixed use schemes to retain the level of existing employment floorspace. However the inclusion of residential use within mixed use schemes will not be appropriate where it would be incompatible with established employment uses on neighbouring sites and prejudicial to their continued operation.

19.E Encouraging major new development to take account of requirements set out in the Planning Obligations Strategy (or any revision) in relation to training and enterprise

#### New Policy LP 40

##### Employment and local economy

The Council will support a diverse and strong local economy in line with the following principles:

1. Land in employment use should be retained in employment use for business, industrial or storage purposes.



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2. Major new employment development should be directed towards Richmond and Twickenham centres. Other employment floorspace of an appropriate scale may be located elsewhere.
3. The provision of small units, affordable units and flexible workspace such as co-working space is encouraged.
4. Mixed use development proposals must retain, and where possible enhance, the level of existing employment floorspace. The inclusion of residential use within mixed use schemes will not be appropriate where it would be incompatible with, or impact on, the continued operation of other established employment uses within that site or on neighbouring sites.

**10.1.1** This policy is concerned with uses within the B Use Classes and other sites which are Sui Generis use with a significant employment generating floorspace. Specific policies for offices and industrial land and business parks are set out separately in this Plan.

**10.1.2** The borough has a significant local economy, with a high proportion of small businesses serving local residents and other local businesses. It is therefore vital in terms of local economic and environmental sustainability objectives to protect and enhance this provision. However, a lack of sufficient employment floorspace provision is a constraint on future employment and business growth in the borough. Therefore there is a presumption against the release of any employment land or stock (office, industrial and storage floorspace) in the borough to other uses. It is imperative that sufficient well-located employment land is retained or redeveloped to meet modern business needs and support a strong sustainable economy.

**10.1.3** A sustainable borough is also one that has a large range of local employment opportunities for its residents and where all residents have access to those opportunities and other services without the need to travel far, or which are accessible by sustainable forms of transport. Therefore, it is important that employment land is retained close to residential areas

to provide a choice of employment opportunities within the borough now and in the future to help to maintain Richmond upon Thames as a borough where both economic and social wellbeing is high.

**10.1.4** The borough is home to nationally important scientific institutions such as The Royal Botanic Gardens, the National Physical Laboratory (NPL) and head office of the Laboratory of the Government Chemist (LGC), as well as academic institutions such as St Mary's University. Scientific, innovation and research, provision of incubator units and laboratories will be supported. Other uses important to the local economy such as education, sports and leisure, arts, culture, entertainment, creative, historic and river related uses that add to the overall economic diversity of the borough will also be supported. Various leisure, cultural and historic sites including Hampton Court Palace and Marble Hill House, the River Thames and its tributaries, and Richmond Park and Bushy Park offer opportunities for economic spin offs as well as contributing to supporting a high quality and unique environment.

### 10.2 Offices

#### Why we are reviewing this policy area

A significant shortage of offices has developed in the borough as a result of B1 to C3 permitted development rights. Therefore the approach is to strengthen the retention of office space across the borough as well as introducing a new designation for Key Office Areas where no loss of office space will be permitted. The Key Office Areas will be new site specific designations based on the existing and forthcoming Article 4 areas.

**What the evidence says**

A substantial quantity of office space has been lost to permitted development rights for change of use from B1 office to C3 residential. 81,978sqm of office floorspace received prior approval between May 2013 and February 2016, amounting to an estimated 28% of overall office floorspace in the borough. Two Article 4 Directions have been made to remove the permitted development rights for B1 to C3 in certain key areas of the borough. It is proposed that the areas to which Article 4 Directions apply will be designated as Key Office Areas with even stronger protection than in wider employment policy to secure the long term future of important employment sites.

The Council's Employment Land and Premises Study (2013) states that projected demand for office space in the borough over the period 2011-31 is 62,000sqm which is equivalent to roughly 3,000sqm per annum. This demand is likely to be higher now as a result of loss of office floorspace due to prior approvals.

b) the scale, bulk and appearance of the proposal should be compatible with the character of its surroundings;

c) the development must not significantly harm the amenities of nearby occupiers nor cause adverse environmental impact on the surrounding area;

d) the scale of development should be compatible with the level of existing or potential public transport accessibility, and the on-street parking situation. Where additional infrastructure is required due to the scale of the development, such a development will be required to fund the necessary infrastructure to support it;

e) the development should comply with the Council's transport, access, servicing, car and cycle parking standards and policies.

In addition

Larger scale new B1a Office development should generally be within the five main town centres.

**Existing Policy 17****Existing Policy DM EM 1 - Development for Offices, Industrial, Storage and Distribution uses (part extract)**

Planning permission will normally be approved for appropriate employment development. The Council will take account of the following factors:

a) the accommodation should be flexible & suitable to meet future needs especially to provide for the requirements of local businesses and small firms;

**Existing Policy 18****Existing Policy DM EM 2 - Retention of Employment (part extract)**

The Council seeks to retain land, sites and buildings which were last used for employment purposes, in employment use. The use of employment land for other purposes will only be permitted where:

(a) There is satisfactory evidence of completion over an extended period of time of a full and proper marketing exercise of the site at realistic prices both for the existing use and for redevelopment (if appropriate ) for other employment uses; or suitable alternative evidence; and either

(b) A sequential approach has been applied to the development of the site as follows:

- i) solely employment-based redevelopment;
- ii) mixed-use or other alternative employment creating uses, where the employment floorspace is retained. Such sites should maximise the amount of affordable housing provided as part of the mix;
- iii) maximum provision of affordable housing in accordance with CP19;

Or (c): The location has such exceptionally severe site restrictions due to very poor access and servicing arrangements that its continued employment use would be inappropriate.

Proposals for Mixed Use schemes must maintain or improve the amount of employment floorspace on site. Each proposal will be considered on its merits and the Council will take account of the following factors when considering mixed use applications:

- i) the amount of employment floorspace;
- ii) the type and mix of uses as existing and proposed;
- iii) likely access, parking and traffic implications;
- iv) compatibility with the policies for other land uses;
- v) design quality;
- vi) the type, size and tenure of residential provision which should be in accordance with policies and guidance in order to maximise the amount of affordable housing provision.

If the above steps have been applied and the Council accepts the site is unsuitable for continued employment or commercial use, or other employment generating uses then affordable housing should be maximised.

### New Policy LP 41

#### Offices

The Council will support a strong local economy and ensure there is a range of office premises within the borough, particularly for small and medium size business activities within the borough's centres, to allow businesses to grow and thrive.

#### Retention of offices

A. There is a presumption against the loss of office floorspace in all parts of the borough.

Any loss of office space (on sites outside of the designated Key Office Areas) will only be permitted where:

1. Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an office based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing office use or an alternative office-based use completed over a minimum period of two continuous years in accordance with the approach set out in Appendix 5; and then
2. A sequential approach to redevelopment or change of use is applied as follows:
  - a. Redevelopment for alternative employment uses including social or community infrastructure uses; followed by
  - b. Mixed use including other employment generating or community uses. Such sites should maximise the amount of affordable housing provided as part of the mix; followed by

c. Residential with maximum provision of affordable housing in accordance with policy LP 36 Affordable Housing.

B. Low cost office spaces should be retained to meet the requirements of small businesses, start-ups and the voluntary sector. Utilising premises above shops in the borough's centres for office occupation is encouraged as a source of lower cost office provision.

### **Key Office Areas**

C. In the designated Key Office Areas, as shown on the Proposals Map, net loss of office floorspace will not be permitted. Any development proposals for new employment or mixed use floorspace will be required to contribute to a net increase in office floorspace. Criteria 1 and 2 in A (above) do not apply to the Key Office Areas areas.

### **New offices**

D. The Council will support appropriate new office development by the following means:

1. Major new office development should generally be within the five main borough centres.
2. Smaller scale office development will be encouraged in suitable locations, particularly within the designated Key Office Areas.
3. New office accommodation should be suitable to meet future needs, especially to provide for the requirements of local businesses and small firms.
4. Design of office floorspace for flexible occupation and modern methods of working such as co-working space is encouraged.
5. The Council will require the provision of affordable office space within all major developments with over 1000sqm of office space; this will be secured through Planning Obligations in line with the Planning Obligations SPD.

**10.2.1** This policy is concerned with uses within the B1 Use Class. The borough has limited office floor space which is often found on small sites scattered across mixed-use and residential areas. A substantial quantity of office space has been lost in the borough as a result of the introduction of permitted development rights for change of use from B1 office to C3 residential. In order to secure the long term future of office sites in the borough there is a presumption against loss of any office space.

**10.2.2** The Council has made two Article 4 Directions to remove permitted development rights in key areas of the borough. These have been used as a basis for the designation of Key Office Areas where net loss of office floorspace will not be permitted.

### **Retention of offices**

**10.2.3** Loss of office floorspace has an adverse effect on business, employment and the character of the borough and will therefore be strongly resisted in all parts of the borough. Net loss of office floorspace will not be permitted in designated Key Office Areas.

**10.2.4** In development proposals that could result in loss of office floorspace outside of designated Key Office Areas, the applicant must provide robust and compelling evidence which clearly demonstrates that there is no longer demand for an office based use in this location and that there is not likely to be in the foreseeable future. This must include a marketing exercise. Given the length of economic and development cycles, an employment site should be marketed for a minimum of two consecutive years. A site should be marketed either for its existing office use or alternative office uses such as flexible, start-up or co-working space. Prices should be based on the local office market and on the existing quality of the accommodation. Refer to Appendix 5 of this Plan for further details on marketing requirements.

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**10.2.5** If the Council is satisfied that a full and proper marketing exercise has been undertaken and that there is evidence that there is no demand for continued office-based use on the site, then redevelopment or change of use away from office use may be appropriate, provided that the following sequential approach to redevelopment is applied:

1. The first step in the sequential test is consideration of alternative employment generating uses. These uses should include in the first instance B Use Classes and if these are not practicable then social infrastructure or community uses such as health clinics, nurseries, crèches, leisure facilities or other uses identified for community purposes.
2. The second step in the sequential test is for mixed use development including other employment generating or community uses. Proposals for mixed use schemes should maintain or improve the amount of employment floorspace on site. Such sites should maximise the amount of affordable housing provided as part of the mix (if residential is proposed).
3. If the Council deems that the retention of the site for employment use is not practicable and proposals for alternative employment generating or community uses are also not appropriate following marketing, then exceptionally the Council may permit residential development with maximum provision of affordable housing. High residential land values across the borough mean that employment land at Existing Use Value may present a source of affordable land that would be financially viable for affordable housing provision.

**10.2.6** In order to maximise the choice of resources and maintain a stock of cheaper accommodation the Council seeks to discourage the unnecessary redevelopment of premises. This will not only allow firms to remain and expand within the borough but also help to ensure that a variety and choice of employment opportunities and services are maintained. In addition, use of premises above shops in centres for office occupation is encouraged as a source of lower cost office provision.

### Key Office Areas

**10.2.7** The Key Office Areas have been designated because of their particular importance for office employment space. These areas align with the areas subject to Article 4 Directions where permitted development rights for change of use from office to residential have been removed. In addition, London House (243-253 Lower Mortlake Road, Richmond) has been identified as a Key Office Area subsequent to the making of the Article 4 Directions. Maps of the Article 4 Direction areas can be viewed on the Council's website.

**10.2.8** In the Key Office Areas there is a presumption that the quantum of existing office floorspace will be retained or enhanced. The Council will not permit loss of office space in these areas and development of new office space is encouraged. Proposals for redevelopment of employment sites or mixed use schemes will be required to contribute to a net increase in office floorspace. Specific details would be discussed on a case by case basis.

**10.2.9** Designated Key Office Areas are shown on the Proposals Map, and listed below:

#### Hampton:

- Thames Street, Hampton
- Kingsway Business Park, Hampton
- Castle Business Village, Station Road and Mount Mews, High Street, Hampton

#### Hampton Wick:

- High Street and Lower Teddington Road, Hampton Wick

#### Hampton Hill:

- Hampton Hill Business Park, Hampton Hill
- Northern part of High Street, Hampton Hill



## Teddington:

- Teddington centre and Waldegrave Road
- National Physical Laboratory, Teddington
- 127-133 High Street, and 1 & 2A Cambridge Road, Teddington
- 180 High Street, Teddington
- 43-67 Broad Street, Teddington
- 90-120 Church Road, Teddington
- 38-42 Hampton Road, Teddington

## Twickenham:

- Twickenham centre (part)
- Bridge House, Twickenham
- Hampton Road, Twickenham
- Briar House, 5-11 Briar Road, Twickenham
- West Twickenham, south of River Crane
- St George's Industrial Estate, Twickenham

## East Twickenham and St Margarets:

- 417-435 Richmond Road, East Twickenham
- St George's House, 76 Crown Road, East Twickenham
- Old Lodge Place, St Margarets

## Richmond:

- Richmond centre
- Petersham Road, Richmond
- Brook House and Sandal House, Richmond
- Sheen Road, Richmond
- 72-84 Lower Mortlake Road, Richmond
- Falstaff House and St George's House, Bardolph Road, Richmond

## Kew:

- The National Archives, Ruskin Avenue, Kew
- Blake Mews, Station Avenue, Kew

## East Sheen and Mortlake:

- Sheen Lane (part), Upper Richmond Road West (part), East Sheen
- Mortlake High Street, Mortlake
- Tideway Yard and The Old Power Station, Mortlake
- London House, 243-253 Lower Mortlake Road, Richmond

## Barnes:

- Prospect Studios, Barnes High Street, Barnes
- 42-46 Glenthams Road, Barnes

**New offices**

**10.2.10** A shortage of office space across the borough leads to increases in rental values and costs for local businesses. Therefore, the Council encourages new office development in appropriate locations to meet local needs.

**10.2.11** The borough's economy is characterised by many small businesses working out of relatively small-scale premises (250sqm or less) and there is an increasing proportion of business start-ups and growing numbers of people running part-time or full-time businesses from home. In support of this, the Council seeks provision of small units to accommodate a variety of local businesses and small firms and to provide the opportunity for residents to set up their own enterprise, enabling them to work closer to home.

**10.2.12** Provision of affordable workspace is necessary to support small and new businesses including those operating on a not-for-profit basis. The council will require the provision of affordable office space within major developments, where over 1,000sqm of office floorspace is proposed. Affordable floorspace should constitute at least 10% of the proposed office floor space and the workspace must remain affordable for a minimum of

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10 years. Affordable workspace is considered to have a rent and service charge of less than 80% of comparable market rates. Affordable office provision, including appropriate rental values, will be agreed and secured through Planning Obligations in line with the Council's Planning Obligations SPD.

**10.2.13** The Council supports new ways of working such as home working, serviced office accommodation, flexible and co-working space. B1 office space, which is compatible with residential areas, should be flexible enough to be used for research, studio, light industrial and office purposes and adaptable enough to meet future needs including for the expansion of local firms. Typical features of flexible office space include:

- clear and flexible floor plate space with few supporting columns;
- large amounts of natural light (windowless and basement offices should be avoided);
- availability of a range of unit sizes ranging from 50sqm up to 1,000sqm;
- realistic rents;
- flexible leasing arrangements taking account of the Code for Leasing and Business Premises in England and Wales 2007; and
- building management - applicants are encouraged to come forward with development partners for the management of flexible employment floorspace prior to submitting an application

**10.2.14** Live-work units are encouraged on suitable sites but they are not normally appropriate on existing employment land where there is an expectation that dedicated workspace is required.

### 10.3 Industrial Land and Business Parks

#### Why we are reviewing this policy area

The pressure of demand for industrial/warehousing land is particularly high in the Borough. In order to support the borough's employment needs the council proposes giving special protection to key land and premises in industrial use, especially those falling within the B2 and B8 Use Classes.

#### What the evidence says

The borough has a very limited supply of industrial floorspace and demand for this type of land is high in the borough. The Mayor of London's Land for Industry and Transport SPG (2012) states that Richmond should ensure a 'restrictive' approach towards the transfer of industrial land to other uses until 2031. Further to this, the GLA has recently published an Industrial Land Supply and Economy Study (2015) which demonstrates that the borough has a very limited supply of industrial land with only 17.3 hectares of general and light industrial space (B2 and B1(c) Use Classes) and 8.1 hectares of warehousing and storage facilities (B8 Use Class), amongst the lowest of all the London boroughs. The 'restrictive transfer' approach is unlikely to change within the next London Plan. Therefore locally important industrial estates and business parks have been identified and listed in this new policy and given enhanced protection. Some of these sites also provide for locally important creative industries and other key employment facilities.

### **Existing Policy DM EM 1 - Development for Offices, Industrial, Storage and Distribution uses (part extract)**

Industrial, storage and distribution development, and improvement and expansion of such premises will normally be permitted, subject to a)-e) above. However, in considering such proposals the Council will take into account the need, if any, to improve the physical environment of the area.

### **Existing Policy 19**

#### **Existing Policy DM EM 2 - Retention of employment**

The Council seeks to retain land, sites and buildings which were last used for employment purposes, in employment use. The use of employment land for other purposes will only be permitted where:

(a) There is satisfactory evidence of completion over an extended period of time of a full and proper marketing exercise of the site at realistic prices both for the existing use and for redevelopment (if appropriate ) for other employment uses; or suitable alternative evidence; and either

(b) A sequential approach has been applied to the development of the site as follows:

- i) solely employment-based redevelopment;
- ii) mixed-use or other alternative employment creating uses, where the employment floorspace is retained. Such sites should maximise the amount of affordable housing provided as part of the mix;
- iii) maximum provision of affordable housing in accordance with CP19;

Or (c): The location has such exceptionally severe site restrictions due to very poor access and servicing arrangements that its continued employment use would be inappropriate.

Proposals for Mixed Use schemes must maintain or improve the amount of employment floorspace on site. Each proposal will be considered on its merits and the Council will take account of the following factors when considering mixed use applications:

- i) the amount of employment floorspace;
- ii) the type and mix of uses as existing and proposed;
- iii) likely access, parking and traffic implications;
- iv) compatibility with the policies for other land uses;
- v) design quality;
- vi) the type, size and tenure of residential provision which should be in accordance with policies and guidance in order to maximise the amount of affordable housing provision.

If the above steps have been applied and the Council accepts the site is unsuitable for continued employment or commercial use, or other employment generating uses then affordable housing should be maximised.

### New Policy LP 42

#### Industrial Land and Business Parks

The borough has a very limited supply of industrial floorspace and demand for this type of land is high. Therefore the Council will protect, and where possible enhance, the existing stock of industrial premises to meet local needs.

#### Retention of industrial space

A. There is a presumption against loss of industrial land in all parts of the borough.

Loss of industrial space (outside of the locally important industrial land and business parks) will only be permitted where:

1. Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an industrial based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing use or an alternative industrial use completed over a minimum period of two continuous years in accordance with the approach set out in Appendix 5; and then
2. A sequential approach to redevelopment or change of use is applied as follows:
  - a. Redevelopment for office or alternative employment uses.
  - b. Mixed use including other employment generating or community uses.

#### Locally important industrial land and business parks

B. The Council has identified locally important industrial land and business parks (as set out in the supporting text and Appendix 6). In these areas:

- a. loss of industrial floorspace will be resisted unless full, on-site replacement floorspace is provided;
- b. development of new industrial floorspace and improvement and expansion of existing premises is encouraged; and
- c. proposals for non-industrial uses will be resisted where the introduction of such uses would have an adverse impact on the continued operation of the existing services.

#### New industrial space

C. Development of appropriate scale industrial uses, and improvement and expansion of such premises, is encouraged. New industrial space should be flexible and adaptable for different types of uses and suitable to meet future needs, especially to provide for the requirements of local businesses.

**10.3.1** The term 'industrial land' referred to throughout this policy covers land used for general industry, light industry, warehouses, open storage, self storage, distribution and logistics and other similar types of employment, as well as any other uses which fall within the B1c, B2 or B8 Use Classes or are considered to be Sui Generis.

**10.3.2** The Mayor of London's Land for Industry and Transport SPG (2012) states that the Council should ensure a 'restrictive' approach towards the transfer of industrial land to other uses until 2031, which means that industrial land should not be released for other uses. Further to this, the GLA's Industrial Land Supply and Economy Study (2015) demonstrates that the borough has a very limited supply of industrial land, with only 17.3 hectares of general and light industrial space (B2 and B1(c)), and 8.1 hectares of warehousing and storage (B8) facilities; this is amongst the lowest of all the London boroughs. It is expected that the 'restrictive transfer'

approach will be retained within the next London Plan. Therefore there is a presumption against loss of any industrial or other such employment space in all parts of the borough, and any loss will be particularly strongly resisted in the listed important industrial land and business parks.

### Retention of industrial space

**10.3.3** There is a presumption against loss of industrial land in all parts of the borough as this space provides valuable employment opportunities and can encourage creativity and entrepreneurialism. Local service trades such as builders or car repair garages provide useful services to residents and other businesses in the borough as well as a source of local employment opportunities. Small firms such as these and start-up businesses require cheaper accommodation and small incubator units but often find it difficult to acquire suitable affordable premises as the higher value of land for other uses creates pressure for redevelopment for higher quality and priced accommodation. It is therefore important to retain a diverse range of different types and sizes of industrial spaces across the borough.

**10.3.4** Any loss of industrial space will only be permitted if the applicant can demonstrate that there is no demand for such space and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing use or an alternative industrial or other such employment use completed over a minimum period of two continuous years. Appendix 5 of this Plan provides further details on marketing requirements.

**10.3.5** If the Council is satisfied that a full and proper marketing exercise has been undertaken and that there is no demand for continued industrial use on the site then redevelopment or change of use away from industrial use may be appropriate provided the following sequential approach to redevelopment is adhered to:

- The first step in the sequential test is consideration of alternative employment generating uses. These uses should include in the first

instance B Use Classes such as offices and if these are not practicable then social infrastructure and community uses such as health clinics, nurseries and crèches, leisure facilities or other uses identified for community purposes.

- The second step in the sequential test is for mixed use development including other employment generating or community uses. Proposals for mixed use schemes should maintain or improve the amount of employment floorspace on site.

### Locally important industrial land and business parks

**10.3.6** The locally important industrial land and business parks, listed below, are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities:

- Kempton Gate Business Park, Oldfield Road, Hampton
- Kingsway Business Park, Oldfield Road, Hampton
- St Clare Business Park, Holly Road, Hampton
- 74 Oldfield Road, Hampton
- 50-56 Waldegrave Road, Teddington
- National Physical Laboratory and Laboratory of the Government Chemist, Hampton Road, Teddington
- Teddington Business Park, Station Road, Teddington
- West Twickenham cluster (including Gregg's Bakery and surroundings), Twickenham
- Heathland Industrial Estate, Twickenham
- St George's Industrial Estate, The Green, Twickenham
- Mereway Road Industrial Estate, Twickenham
- Swan Island Industrial Estate, Strawberry Vale, Twickenham
- Electroline House and surrounds, Twickenham
- St Margarets Business Centre, Winchester Road, St Margarets
- Twickenham Film Studios and Arlington Works, St Margarets
- Market Road, Richmond
- Sandycombe Centre, Sandycombe Road, Kew



## 10 Employment and Local Economy

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- Marlborough Trading Estate, Mortlake Road, Kew
- Mill Farm Business Park, Whitton
- Big Yellow Self Storage, Lower Mortlake Road, Richmond
- Big Yellow Self Storage, Lower Richmond Road, Richmond
- Currie Easy Self Storage, Market Road, Richmond

**10.3.7** Maps of the above areas can be found in Appendix 6 of this Plan.

**10.3.8** In the locally important industrial land and business parks loss of industrial space will be strongly resisted unless full on-site replacement provision is provided. New appropriate industrial, storage and distribution development, as well as improvement and expansion of such premises, is encouraged in these areas, particularly new B2, B8 and B1(c) floorspace. Proposals for non-industrial uses will be resisted unless the proposed uses are ancillary to the principal industrial use on the site.

### New Industrial space

**10.3.9** The Council encourages and supports new industrial uses and business parks in appropriate locations that meet local needs. New industrial space should be flexible, modern and adaptable for different users. When considering proposals for rebuilding or expansion of existing industrial and storage premises, the Council will encourage improvements to the physical environment within and adjacent to industrial areas.

### 10.4 Visitor Economy

#### Why we are reviewing this policy area

Research undertaken by the GLA has shown that there is a need for additional bedspaces to meet need in the borough and to contribute toward the regional target set out in the London Plan. The policy has been revised to reflect this.

#### What the evidence says

The London Tourism Action Plan 2009-2013 produced by the GLA identifies a potential additional room requirement for the borough of 300 serviced rooms (hotels, B&Bs and hostels), and a further 100 rooms of non-serviced accommodation. Regional data on the supply of visitor accommodation was updated in 2012 showing that although the amount of accommodation has been increasing there will be a need for 42,900 serviced visitor rooms across the capital by 2036.

#### Existing Policy - CP20 Visitors and Tourism

The Council will support the sustainable growth of the tourist industry, for the benefit of the local area by:

20.A Encouraging the enhancement of existing tourist attractions, such as Kew Gardens, Hampton Court Palace, Ham House and the River, including sport stadia particularly those of RFU and Harlequins;

20.B Promoting sustainable transport for tourists to and within the borough, including the passenger services along the Thames;

20.C Directing new hotels to the Borough's town centres or other areas highly accessible by public transport;

20.D Requiring accommodation and facilities to be accessible to all;

20.E Enhancing the environment in areas leading to and around tourist destinations.

## New Policy LP 43

### Visitor Economy

A. The Council will support the sustainable growth of the visitor economy for the benefit of the local area by:

1. supporting proposals which promote and enhance the borough's existing tourist attractions, including the unique, historic and cultural assets that are connected via the River Thames, such as The Royal Botanic Gardens, Kew, Ham House and Hampton Court Palace;
2. proposals that lead to increased visitors and tourists need to be of an appropriate scale for the size of the centre and will be assessed against the transport policies of this Plan;
3. requiring accommodation and facilities to be accessible to all; at least 10% of hotel bedrooms should be wheelchair accessible;
4. enhancing the environment in areas leading to, within and around visitor destinations where appropriate.

B. In relation to visitor accommodation:

1. proposals which result in the loss of bedspaces will be resisted;
2. proposals which increase the number of bedspaces will be supported subject to other Local Plan policies;
3. proposals will be supported which contribute towards providing a range of visitor accommodation, including small independent hotels and bed and breakfast accommodation, subject to other Local Plan policies.

**10.4.1** The Council recognises the value of the visitor economy both to the local and London economy. The borough is a popular destination for visitors to traditional attractions such as the historic houses and gardens, the River Thames as well as the rugby-related attractions and associated

facilities such as restaurants and shops. Much of the borough is designated as a Strategic Cultural Area in the London Plan. The Council will expect the major attractions including Twickenham Stadium and the Stoop (Harlequins) to be developed in accordance with the Site Allocations set out in this plan.

**10.4.2** The Council will encourage the provision of accommodation to enable visitors to stay longer and spend more. Major new hotel development will be expected to be located within main centre boundaries in the first instance as in policy LP 25 in 7.1 'Development in Centres', which also sets out guidance on the appropriate location and scale of hotel development. The London Plan includes a target of 40,000 net additional hotel bedrooms by 2036. The London Tourism Action Plan 2009-2013 identifies a potential additional room requirement for the borough of 300 serviced rooms (hotels, B&Bs and hostels), and a further 100 rooms of non-serviced accommodation (which include serviced apartments because they do not provide the same level of service as a hotel) by 2036. Therefore, proposals which increase the number of bedspaces will be supported, subject to other Local Plan policies, where they contribute to meeting the London Plan target, which has been met in part.

**10.4.3** In determining applications for hotel development the Council will be mindful of the impact of the development on amenity, living conditions, parking, servicing and transport. It will be taken into account whether any ancillary facilities within the hotel, such as a gym, are open for public use.

**10.4.4** The Council will work with its partners to promote the borough as a tourist destination. It is also recognised that major events held within the borough attract very large numbers of people, and the Council will continue to work with partners, including public transport operators and event organisers, to promote sustainable travel choices and minimise disruption to residents and local businesses where possible.

# Transport 11

Pre-Publication Local Plan

## 11 Transport

### 11.1 Facilitating Sustainable Travel Choices

#### Why we are reviewing this policy area

The existing transport policies are generally in accordance with national and regional guidance. In particular, the overarching transport strategy requires higher trip generating developments to be located within main centres and in areas well served by public transport. There are opportunities to align and consolidate the various existing policies dealing with sustainable transport and travel choices and to take account of the Minor Alterations to the London Plan (2015).

We want to strengthen the focus on managing freight and servicing, set out requirements for electric vehicle charging points and support alternatively fuelled vehicles and the retention of local filling stations / commercial sites, e.g. car repairs. In addition, we want to specifically encourage river transport in line with the London Plan's Blue Ribbon Network policies for passengers, tourism and freight transport. We also want to align the transport policies and the aim of reducing congestion, improving the local environment and tackling poor air quality.

#### What the evidence says

The Council's Local Implementation Plan (LIP) for Transport sets out a local programme of measures and schemes, and provides the transport context for the borough.

There is a need for higher trip generating development to be located within areas easily accessible to transport opportunities other than the private car. There is also a need to set out requirements for

assessing potential impacts, including cumulative impacts of new development, on the transport network. Sufficient and suitably located land has to be safeguarded in the borough for the strategic transport schemes mentioned in the London Plan in order to implement the following proposals:

- Public transport - Crossrail 2, London Overground improvements, Southwest Rail ten car capacity, bus network development and bus stop accessibility;
- Cycling initiatives - Quietways, Greenways, Biking Boroughs, Mini-Hollands, Cycle superhubs at stations, Cycle to School Partnerships, cycle parking;
- Other – enhanced urban realm and pedestrian environment, enhanced safety features improving safety for all road users

Requirements for the production of Transport Assessments and Transport Statements have to be set out in policy; detailed guidance will be included in a forthcoming SPD on Sustainable Transport Choices.

There is a need to manage traffic impacts that could lead to congestion and pollution, particularly as the whole of the borough is a designated Air Quality Management Area (AQMA), with a number of areas with particularly high levels of pollutants including in main centres and along key transport corridors.

#### Existing Policy CP5 - Sustainable Travel

5.A The need for travel will be reduced by the provision of employment, shops and services at the most appropriate level locally, within the network of town centres identified in CP 8. To implement this policy the Council will :

- Protect and enhance local facilities and employment to reduce the need to travel.
- Require developments which would generate significant amounts of travel to be located on sites well served by public transport.

In promoting safe, sustainable and accessible transport modes such as walking, cycling and public transport, in association with its partners the Council will seek to:

### 5.B Land for transport

- Safeguard land for existing and proposed transport functions
- Reflect the above priorities in the allocation of road spaces as part of the Parallel Initiatives Programme

### 5.D Public Transport

- Improve provision for buses particularly in Richmond and Twickenham town centres, and seek to improve bus services within River Crane Corridor through the implementation of development proposals.
- Achieve integration and convenient interchange facilities at all the borough's stations
- Seek improvements to orbital public transport including rail access to Heathrow.
- Improve walking, cycling and public transport in areas less well served by public transport, including some of the areas of relative deprivation.

### 5.E Congestion and Pollution

- Undertake traffic management measures to reduce the impact of traffic particularly in Richmond town centre, the district and local centres, residential areas and streets unsuitable for through traffic.

### 5.G Sustainable travel

- Encourage major employers and schools to develop Green Travel Plans and require these where appropriate with planning applications.
- Require all major developments to submit a Transport Assessment based on TfL's Best Practice Guidance.
- Encourage efficient, safe and sustainable freight transport.
- Encourage river transport through the retention and support for new transport infrastructure.

5.H The Council will support measures to minimise the impacts of Heathrow, particularly on traffic and noise on the Borough and will oppose changes that increase local impacts. Specifically it will seek the support of BAA, the Government and relevant statutory authorities for the following measures:

- a) maintenance of the 480,000 limit on total air transport movements;
- b) maintenance of the current system of segregated mode;
- c) maintenance of the current noise preferential routes;
- d) the discontinuation of night flights;
- e) restrictions of the use of private cars and improvements to public transport including a southern rail link.

### **Existing Policy DM TP 1 - Matching Development to Transport Capacity**

Higher trip generating development will only be permitted in areas which are, or at the time of implementation are, easily accessible by transport other than the private car, and well located with respect to local services.



**Existing Policy DM TP 2 - Transport and New Development**

The impact of new development on the transport network will be assessed against other plan policies and transport standards. All planning applications for major developments should be accompanied by a Transport Assessment and for smaller developments should be accompanied by a Transport Statement. Matters to be included are set out in DoT/TfL guidance.

Developers should also take account of the Council's SPD on Transport Standards.

**Existing Policy DM TP 3 - Enhancing Transport Links**

New developments will be expected to create or improve links with the local and wider transport networks, including links to the cycle and pedestrian networks.

All new developments must be designed to improve accessibility including:-

1. Maximise permeability, with safe, convenient, accessible and appropriate road, cycle and pedestrian routes within and in the immediate vicinity of the scheme, as well as accessible walking and cycling links to the wider transport network including to public transport nodes and key land uses, taking account of the need to connect people to jobs, to town centres and to schools.
2. Gated developments will not be permitted.
3. Developments adjoining the River Thames must provide a public riverside walk.

**Existing Policy DM TP 4 - Integration of different types of Transport and Interchange Facilities**

Developments will be expected to improve the quality and connectivity of transport interchanges of any scale, particularly in terms of

- Opportunities for interchange between different types of transport through the provision of appropriate facilities and good information.
- Ease of access to interchange points (e.g. stations/ bus stops) by various types of transport.
- Transport facilities which are well laid out and allow access to a wide range of users (e.g. level or with accessible lifts or ramps).
- Attractive and welcoming environment – well designed civic spaces, sun and rain shelter, high quality and well maintained hard and soft landscape
- Safe and secure environment – e.g. good lighting, CCTV, ticket barriers

**Existing Policy DM TP 5 - Taxis and Private Hire Vehicles**

Taxi ranks should be conveniently located and accessible for all with adequate space for customers to queue, well lit and with good CCTV facilities. Ranks must not adversely impact on pedestrian movement or road safety.

The Council will consider applications for offices for private hire vehicles against relevant policies of the plan, and subject to them not having an adverse impact on other types of transport including walking and cycling, on-street parking and highway safety or causing disturbance to residents.

#### New Policy LP 44

##### **Facilitating Sustainable Travel Choices**

The Council will work in partnership to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion and air pollution, and maximise opportunities including for health benefits and providing access to services, facilities and employment. The Council will:

##### **A. Location of development**

Encourage high trip generating development to be located in areas with good public transport with sufficient capacity, or which are capable of supporting improvements to provide good public transport accessibility and capacity.

##### **B. Walking and cycling**

Ensure that, where appropriate, new development is designed to maximise permeability within and to the immediate vicinity of the development site through the provision of safe and convenient walking and cycling routes, and to provide opportunities for walking and cycling, including through the provision of links and enhancements to existing networks.

##### **C. Public transport**

Ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services. Proposals will be expected to support improvements to existing services and infrastructure where no capacity currently exists or is planned to be provided.

Protect existing public transport interchange facilities unless suitable alternative facilities can be provided which ensure the maintenance of the existing public transport operations. Applications will need to include details setting out how such re-provision will be secured and provided in a timely manner.

##### **D. The road network**

Ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks. Any impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development, including in relation to on-street parking, should be mitigated through the provision of, or contributions towards, necessary and relevant transport improvements.

In assessing planning applications the cumulative impacts of development on the transport network will be taken into account. Planning applications will need to be supported by the provision of a Transport Assessment if it is a major development, and a Transport Statement if it is a minor development.

##### **E. River transport**

Encourage the use of the River Thames for passenger and freight transport through the protection of, and improvement to, the relevant infrastructure including wharves and slipways.

##### **F. Safeguarding of routes and facilities**

Land required for proposed transport schemes as identified in the London Plan and the Council's Local Implementation Plan for Transport will be protected from developments which would prevent their proper implementation.

Local filling stations and supporting services such as car repair facilities will be protected from redevelopment for alternative uses unless exceptional circumstances can be demonstrated that warrant their loss.

The Council's aim is to minimise the impacts of development, including in relation to congestion and air pollution. Transport has a significant impact on air quality in the borough, with many areas experiencing levels of pollution above national set target levels. Consequently the entire borough is designated an Air Quality Management Area. This policy, together with the policy on Parking Standards and Servicing, support the achievement of the Air Quality Management Objectives.

### Location of development

**11.1.1** The usual measure of accessibility is the Public Transport Accessibility Level (PTAL), which takes account of the accessibility of a location to public transport, in six broad bands, with level 6 being the most accessible. Whilst in general higher PTALs are achieved in areas with good rail/tube connections, in this borough it is recognised that bus links also contribute to levels of accessibility. Future improvements to accessibility will also be relevant. These include planned changes by Transport for London (TfL), the Council, rail or bus companies or improvements which could be either provided as part of a new development or funded by developer contributions. To be taken into account there will need to be certainty that future improvements will be implemented in time to serve the development and would be sustainable in the longer-term.

**11.1.2** High trip generating development includes larger offices, shopping and leisure facilities as well as mixed use and higher density residential schemes, where a large number of trips are generated each day. As a starting point, areas with a PTAL score of 5 or higher are considered to be appropriate locations for high trip generating development.

**11.1.3** The Council will use a site's current PTAL as a starting point, but also consider the highway capacity, the proximity of cycle and walking routes as well as future improvements when evaluating development proposals.

### Walking, cycling and public transport

**11.1.4** Developments should encourage the use of modes other than the car by making it as easy as possible through provision of good pedestrian facilities, clear layout and signage, provision of cycling facilities and improving access to public transport interchanges. Civic spaces and public realm should be accessible and inclusive. A good walking environment has been shown to be not only beneficial to an individual's health and social life, but also to bring economic benefits to the borough's centres.

**11.1.5** Cycling and walking contributes significantly towards creating an attractive and pleasant environment. New development should include all the facilities needed to encourage a safe walking and cycling environment from first occupation. The minimum cycle parking standards are set out in policy LP 45 in 11.2 'Parking Standards and Servicing'.

**11.1.6** Developments should be integrated into the surrounding community and existing local routes, and provide for improvements to accessibility for all. There are many footpaths, Public Rights of Way and cycle routes in the borough that new development should not compromise, and opportunities to improve them should be taken wherever possible. For this reason, in line with policy LP 1 in 4.1 'Local Character and Design Quality', gated developments will not be permitted.

**11.1.7** The Council promotes the creation of a safe network for pedestrians and cyclists. Management of other users including speed restrictions, sufficient widths, segregation where appropriate and well designed and positioned crossing facilities can reduce conflict between users. Well designed paths, natural surveillance, appropriate levels of lighting and other security measures and good levels of maintenance can improve actual and perceived security. The Council's Public Space Design

Guide includes advice with respect to the amenity of the pedestrian environment. The London Cycle Design Standards sets out requirements and advice for cycle network planning and for the design of dedicated cycle infrastructure, cycle-friendly streets and cycle parking.

**11.1.8** The Council will ensure that there is signage and way marking of the three strategic walking routes identified in the London Plan, which run through the borough – the Thames Path National Trail, the Capital Ring and the London Loop, and other promoted route, such as the River Crane Walk and Beverley Brook Walk, which together form a network of leisure routes which most residents can reach.

**11.1.9** Proposals that improve transport links within or between the borough and other areas will be encouraged. This could refer to physical proposals and improvements such as a new bridge or path; improving existing links such as creating a new gate into a park; or increasing the use of an existing link such as the promotion of a route as a travel option.

#### **The road network**

**11.1.10** All planning applications for major developments must be accompanied by a Transport Assessment, or for minor developments a Transport Statement. This may include Travel Plans, Delivery and Servicing Plans and Construction and Logistic Plans. Matters to be included are set out in the London Plan, the latest Department for Transport as well as Transport for London guidance, the Council's Local Validation Checklist and will also be included in a forthcoming SPD on Sustainable Transport Choices, which is being developed by the Council.

**11.1.11** Developments will be expected to continue travel planning after occupation to maximise travel by sustainable transport, including personalised travel planning. Existing schools and large employers will also be encouraged to produce travel plans for their sites to help encourage sustainable travel.

#### **River transport**

**11.1.12** The Council encourages the use of the River Thames for passenger and freight transport through the protection of, and improvement to, the relevant infrastructure including wharves and slipways. By reducing demand for other forms of surface transport, particularly on roads, the benefits of water transport link through to other key aspects of this Plan, such as reducing traffic and congestion, improving the local environment and quality of life. Together with other policies in this Plan, including LP 12 in 5.1 'Green Infrastructure', LP 18 in 5.7 'River Corridors' as well as LP 19 in 5.8 'Moorings and Floating Structures', this policy supports the multi-functional use of the Blue Ribbon Network.

#### **Safeguarding of routes and facilities**

**11.1.13** To discourage vehicles having to make longer trips in order to reach refuelling stations, the Council is seeking to protect existing facilities. Any new facilities should be located on strategic or distributor road networks to minimise disruption and to protect residential amenity. The provision of refuelling facilities for alternative types of fuel e.g. electric or hydrogen will also be encouraged.

**11.1.14** The need for improved quality and connectivity of transport interchanges to improve movement in Outer London was identified in both the London Plan and by the Outer London Commission. In the local context 'transport interchanges' refers to anywhere where more than one type of transport mode meets, from train and bus stations to bus stops. The Council will be examining main transport interchanges in consultation with the operating companies and proposing improvements to be taken forward in the Council's Local Implementation Plan for Transport and where appropriate in the site allocations of the Local Plan, and/or in planning briefs.

**11.1.15** Delivery of transport infrastructure, including the relevant proposed transport schemes as set out in the London Plan, is critical to the delivery of the strategic objectives of the Local Plan. Planning, through the use of developers' contributions such as through the use of planning

obligations (including Section 106 and Community Infrastructure Levy) is a way that the Council can gain the necessary resources to assist in the delivery of this vital infrastructure.

## 11.2 Parking Standards and Servicing

### Why we are reviewing this policy area

The Council has adopted its own parking standards as part of the Development Management Plan in 2011. There is an opportunity to review the evidence on this and research into the borough's parking standards is underway. The review also provides the opportunity to include guidance on freight and servicing to ensure any negative impacts associated with this activity are minimised.

### What the evidence says

National guidance states that authorities should only impose local parking standards where there is a clear and compelling justification to manage the local road network. The London Plan sets London-wide maximum parking standards, promotes and encourages car sharing and car clubs, including disabled parking. It expects an appropriate balance to be struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. The London Plan now includes greater flexibility for residential parking standards in outer London in PTALs 0-1, and in limited parts in PTAL2.

The Council is in the process of developing research to inform the review of the local parking standards policy, which will be based on the following options:

- the adopted London Plan standards, including the flexible approach in areas of PTALs 0-1, with limited parts in PTAL 2;

- the Council's current parking standards, as set out in the Development Management Plan; and
- new borough-wide parking standards, as informed by the research and analysis of options

### Existing Policy CP5 - Sustainable Travel

#### 5.F Car parking and travel

- Require new car free housing in Richmond and Twickenham town centres and in other areas where there is good public transport and elsewhere have regard to maximum parking standards.
- Require car share facilities and car clubs in appropriate new developments and encourage the use of low emission motor vehicles in order to reduce congestion and pollution.
- Discourage commuter parking particularly by giving priority to residents' needs.
- Limit any further expansion of parking in town and local centres and manage parking controls to help maintain the vitality and viability of the centres, including the evening economy.

### Existing Policy DM TP 8 - Off Street Parking - Retention and New Provision

Developments, redevelopments, conversions and extensions will have to demonstrate that the new scheme provides an appropriate level of off street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions.



A set of maximum car parking standards and minimum cycle parking standards are set out in Appendix Four - Parking Standards for all types of development, these take into account bus, rail and tube accessibility as well as local highway and traffic conditions including demand for on-street parking. These standards will be expected to be met, unless it can be shown that in proposing levels of parking applicants can demonstrate that there would be no adverse impact on the area in terms of street scene or on-street parking.

### Existing Policy DM TP 9 - Forecourt Parking

The parking of vehicles in existing front gardens will be discouraged, especially where

- this would result in the removal of architectural features such as walls, gates and paving, or of existing trees and other vegetation or,
- where such parking would detract from the streetscape or setting of the property or,
- where the use of the access would create a road or pedestrian safety problem or
- where the width of the proposed entrance will be greater than the width of a normal driveway.

For any proposal the area of impermeable paving should be minimised and soft landscaping maximised.

The Council will seek to restrict permitted development rights for forecourt parking through Article 4 directions, where important townscape or surface water flooding issues exist. The Council will have regard to the impact of forecourt parking in considering proposals to extend or convert existing residential property.

### New Policy LP 45

#### Parking Standards and Servicing

##### Parking standards

The Council will require new development to make proper provision for the accommodation of vehicles in order to minimise the impact of car based travel including on the operation of the road network and local environment and ensuring making the best use of land. It will achieve this by:

1. Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points in accordance with the standards set out in Appendix 3. Opportunities to minimise car parking through its shared use will be encouraged.
2. Resisting the provision of front garden car parking unless it can be demonstrated that:
  - a. there would be no material impact on road or pedestrian safety;
  - b. there would be no harmful impact on the character of the area, including the streetscape or setting of the property, in line with the policies on Local Character and Design; and
  - c. the existing on street demand is less than available capacity.
3. Car free housing developments may be appropriate in areas with a PTAL of 5 or 6, subject to:
  - a. the provision of disabled parking;
  - b. appropriate servicing arrangements; and
  - c. demonstrating that proper controls can be put in place to ensure that the proposal will not contribute to on-street parking stress in the locality.

All proposals for car free housing will need to be supported by the submission of a Travel Plan.

4. Managing the level of publicly available car parking to support the vitality and viability of town and local centres within the borough whilst limiting its impacts on the road network.

### **Freight and Servicing**

New major development which involves freight movements and has servicing needs will be required to demonstrate through the submission of a Delivery and Servicing Plan and Construction and Logistics Plan that it creates no severe impacts on the efficient and safe operation of the road network and no material harm to the living conditions of nearby residents.

**11.2.1** The borough has high levels of car ownership and use within fairly densely developed residential areas with some narrow streets and many older houses without off-street parking. This has led to high levels of on street parking, worsened in areas where there is a demand for commuter parking. The standards set are maximum parking levels and car parking provision should not be at a level less than these standards, unless an exceptional circumstance is demonstrated. The approach aims to ensure that sufficient on-site car parking is provided to meet the needs of the occupiers of the new development, but also to ensure that excessive on-street parking demand is not created which could have an adverse impact on local highway/traffic conditions, street scene and impacts on making the best use of land.

**11.2.2** This policy covers the parking standards for new developments of all types. Parking must be sensitively located and designed and suitably landscaped to minimise visual intrusion and disturbance. To maintain sufficient parking space within new developments, the parking provision will be expected to be legally tied to the development that it serves. In areas controlled by a Community Parking Zone, occupiers of new

residential developments may not be eligible for resident or visitor on street parking permits where existing levels of on street parking are very high. This restriction would be secured by a Planning Obligation.

**11.2.3** Developers may only provide fewer parking spaces, including car free schemes, if they can show that there would be no adverse impact on amenity, street scene, road safety or emergency access in the surrounding area, a result of the generation of unacceptable overspill of on-street parking in the vicinity. In general it is expected that in PTAL areas of 1-4 the standards should be met, but in PTAL areas of 5-6, such as Richmond and Twickenham centres, parking provision at a level lower than the standard or a car free development, supported for example by a car club, may be appropriate in exceptional circumstances.

**11.2.4** Within the main centres, further expansion of car parking (particularly within Richmond and Twickenham) will be limited and other policies will be used to help maintain viability and vitality of the centres. In East Sheen and Whitton, where public parking is relatively limited, the loss of off street parking will be resisted, especially in relation to large supermarkets and pub or hotel developments.

**11.2.5** Car share facilities and car clubs will be encouraged, but these will not obviate the need for adequate off street parking provision. Charging facilities for electric vehicles will have to be provided in line with the standards set out in the London Plan.

**11.2.6** The majority of the borough's businesses and other organisations require regular servicing and deliveries to their site(s). However, it must be recognised that whilst these vehicles provide a vital service, they can also be a cause of congestion, safety and environmental concerns if not properly managed through a variety of mechanisms. Such premises often neighbour residential properties and a balance needs to be achieved between enabling businesses to receive the goods and services they need and protecting residential amenity. A range of techniques and facilities can be used as tools in minimising any negative impacts from freight and servicing.

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**11.2.7** Delivery and Servicing Plans and Construction and Logistics Plans will be required for all major developments. Details regarding the requirements for these plans will be set out in a forthcoming Sustainable Transport Choices SPD.

**11.2.8** The Council's SPD on Parking in Front Gardens discourages the parking of vehicles in existing front gardens. Further guidance is also contained policy LP 1 in 4.1 'Local Character and Design Quality' and in the Village Planning Guidance SPDs.

# Site Allocations 12

Pre-Publication Local Plan

## 12 Site Allocations

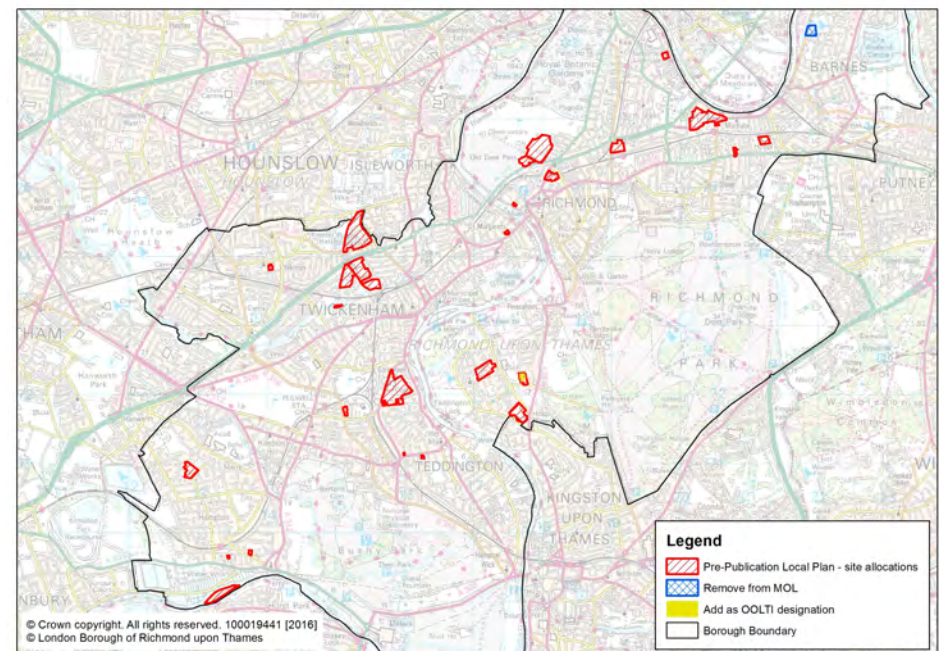
### 12.1 Site Allocations

**12.1.1** The Council has identified key sites that are considered to assist with the delivery of the Spatial Strategy of this Plan. This is of particular importance for ensuring there is sufficient land for employment, retail, housing and social infrastructure.

**12.1.2** In order to support the borough's demand and need for employment taking into account job and growth forecasts, the site allocations should be considered alongside the designation for the 'Key Office Areas' (in line with policy LP 41 in 10.2 'Offices' of this Plan), which have been designated because of their particular importance for providing space for businesses and firms that support local employment. In addition, the Council has identified locally important industrial land and business parks, as set out in policy LP 42 in 10.3 'Industrial Land and Business Parks' of this Plan, which are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities.

#### Overview and summary of allocated sites

**12.1.3** The following provides a borough-wide overview and list of all sites that have been identified for development as part of the Local Plan.



- SA 1 Hampton Square, Hampton
- SA 2 Platts Eyot, Hampton
- SA 3 Hampton Traffic Unit, 60-68 Station Road, Hampton
- SA 4 Hampton Delivery Office, Rosehill, Hampton
- SA 5 Telephone Exchange, Teddington
- SA 6 Teddington Delivery Office, Teddington
- SA 7 Strathmore Centre, Strathmore Road, Teddington
- SA 8 St Mary's University, Twickenham
- SA 9 Richmond upon Thames College, Twickenham
- SA 10 The Stoop (Harlequins Rugby Football Club), Twickenham
- SA 11 Twickenham Stadium, Twickenham
- SA 12 Mereway Day Centre, Mereway Road, Twickenham
- SA 13 Telephone Exchange, Whitton
- SA 14 Ham Close, Ham
- SA 15 Cassel Hospital, Ham Common, Ham



- SA 16 St Michael's Convent, Ham Common, including new OOLTI designation
- SA 17 Ryde House, East Twickenham
- SA 18 Richmond Station, Richmond
- SA 19 Friars Lane Car Park, Richmond
- SA 20 Sainsbury's, Lower Richmond Road, Richmond
- SA 21 Pools on the Park and surroundings, Richmond
- SA 22 Richmond Rugby and Richmond Athletic Ground, Richmond
- SA 23 Stag Brewery, Lower Richmond Road, Mortlake
- SA 24 Mortlake and Barnes Delivery Office, Mortlake
- SA 25 Kew Biothane Plant, Mellis Avenue, Kew
- SA 26 Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen
- SA 27 Barnes Hospital, East Sheen
- MOL boundary change at Harrodian School, Barnes

**12.1.4** The following section provides details for the borough's key site allocations. Each proposal site is supported by a site map with a red line depicting the boundary as well as a description of key features, land uses and where relevant the link to the local evidence and need.

**12.1.5** Note that all the policies set out in this Plan also apply to the site allocations.

**12.1.6** The Council adopted the Area Action Plan (AAP) for Twickenham centre in 2013, which sets out detailed policies and site-specific proposals for Twickenham centre. The AAP including its site-specific proposals will remain as existing due to its relatively recent adoption.

#### SA 1 Hampton Square, Hampton

Partial redevelopment and improvement for community, retail and local services, employment and residential uses, including affordable units and car parking.

- The Council has already rejuvenated Hampton Square through an £800,000 investment project. The Square now provides a modern and welcoming focal point for Hampton North, including an impressive illuminated water feature, seating, landscaping and space for a whole range of community activities.
- There is still a need for partial redevelopment and improvement of the related buildings to provide for community, retail, service, local business uses and residential uses, including affordable housing, which will complement the new Hampton Square.
- Any scheme should include improvements to pedestrian routes where possible and adequate car parking needs to be retained to meet the needs of the community centre and new uses.
- The redevelopment should ensure that it creates an attractive setting for the rejuvenated Square and that it contributes to creating an active and lively local centre.
- The green open space to the south of the site is designated Public Open Space and Other Open Land of Townscape Importance. Any proposal for redevelopment of this site should ensure that it establishes a positive relationship with the adjoining green space, and where possible enhance its setting.
- Detailed guidance on design and local character for any redevelopment proposal will also be set out in the Village Planning Guidance SPD for Hampton.

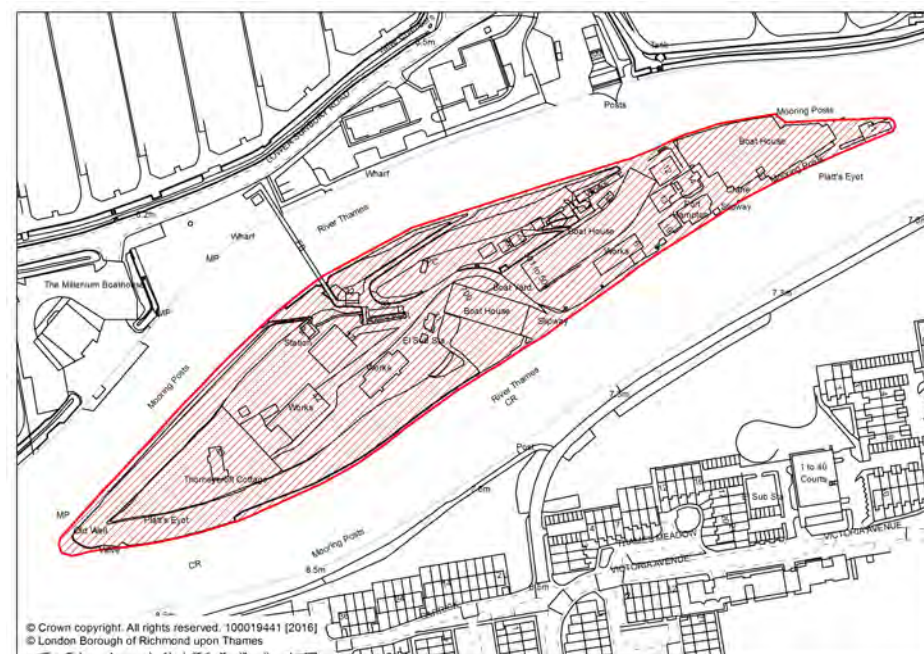


## SA 2 Platts Eyot, Hampton

Regeneration of the island by maintaining, and where possible enhancing, existing river-dependent and river-related uses. New business and industrial uses (B1, B2 and B8) that respect and contribute to the island's special and unique character are encouraged. Residential development to enable the restoration of the Listed Buildings, especially those on the Heritage at Risk Register, may be appropriate.

- There is a need to retain and protect the island's unique employment and business uses, particularly the river-related uses, including the docks, wharves and slipways.
- A number of listed boathouses on the island are on the Heritage at Risk Register. There is a need to ensure that properties on the Heritage at Risk register, together with the Conservation Area and the wider character of the island, are improved and enhanced.
- It is acknowledged that some enabling residential development may be needed to support the restoration of the Listed Buildings; this should be limited to the minimum necessary to achieve viability.
- Residential uses should complement the existing character of the island as well as maintain and where possible improve the appearance. They should not prejudice the continued operation of existing river-dependent and river-related uses.
- There is restricted access to the island and any proposed scheme will need to address the issue of providing safe access and egress in the event of flooding; this is also likely to limit the amount of residential development on the island.
- The Council will work closely with the Environment Agency to understand the issues relating to the provision of safe access / egress to and from the island.

- The Council is committed to working in partnership with the site owners to develop a Masterplan or development brief for the island.
- Detailed guidance on design and local character for any redevelopment proposal will also be set out in the Village Planning Guidance SPD for Hampton.





#### SA 3 Hampton Traffic Unit, 60-68 Station Road, Hampton

Appropriate land uses include business (B1), employment generating and other commercial or social and community infrastructure uses. The Building of Townscape Merit should be retained and a pedestrian link should be provided through the site.

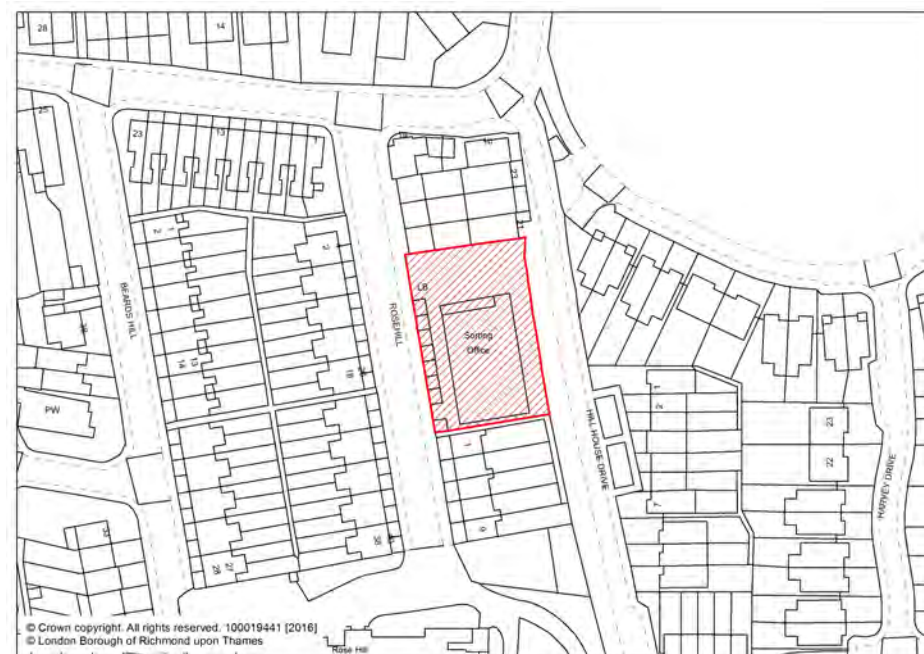
- The site is within the designated Hampton Village local centre.
- The Building of Townscape Merit should be retained.
- The site was declared surplus to requirements by the Metropolitan Police in 2015.
- The evidence suggests there is a need for employment generating and other commercial or social infrastructure uses in this area.
- Only if other employment generating, commercial and social infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with affordable housing and on-site car parking be considered as a potential redevelopment option.
- Any proposed scheme should create a pedestrian link through the site between Station Avenue and Beveree Sports Ground.
- Detailed guidance on design and local character for any redevelopment proposal will also be set out in the Village Planning Guidance SPD for Hampton.



**SA 4 Hampton Delivery Office, Rosehill, Hampton**

If the site is declared surplus to requirements, appropriate land uses include employment generating or social and community infrastructure uses.

- The site is subject to being declared surplus to requirements by the Royal Mail.
- The evidence suggests there is a need for employment generating and social infrastructure uses in this area.
- Residential uses may also be appropriate as part of a mixed use scheme.
- Only if other employment generating, commercial and social infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with affordable housing and on-site car parking be considered as a potential redevelopment option.
- Any proposed scheme has to be compatible with, and complement, the surrounding residential area.
- Detailed guidance on design and local character for any redevelopment proposal will also be set out in the Village Planning Guidance SPD for Hampton.





#### SA 5 Telephone Exchange, Teddington

If the site is declared surplus to requirements, appropriate land uses include commercial / retail on the ground floor, especially in the designated key shopping frontage facing the High Street. Any proposal should provide for employment floorspace, such as B1 offices. A mixed use scheme with housing (including affordable housing) in upper floors and to the rear of the site could be considered.

- The site is located within Teddington's main centre boundary and partly designated as a key shopping frontage.
- The site is subject to being declared surplus to requirements by British Telecom.
- The Council's Retail Study forecasts a requirement for ca. 2000sqm (gross) of A1 to A5 uses for Teddington, of which approximately half of this requirement is for comparison retail (A1).
- This site could accommodate around two thirds of Teddington's retail need at ground floor level.
- Any redevelopment proposal should provide for commercial / retail floorspace on the ground floor and create an attractive frontage, including retaining the open area fronting the High Street.
- As this is a site in one of the borough's main centres, there is an expectation that any proposal provides employment floorspace, particularly B1 offices.
- Only if other commercial or employment generating uses have been explored and options discounted in line with other policies in this Plan, would the provision of housing, including affordable housing, in upper floors and to the rear of the site as part of a mixed use scheme, be considered as a potential redevelopment option.
- Detailed guidance on design and local character for any redevelopment proposal will also be set out in the Village Planning Guidance SPD for Teddington and Hampton Wick.



### SA 6 Teddington Delivery Office, Teddington

If the site is declared surplus to requirements, appropriate land uses include commercial / retail on the ground floor, especially in the designated key shopping frontage facing the High Street. Any proposal should provide for employment floorspace, including B1 offices. A mixed use scheme with housing (including affordable housing) in upper floors and to the rear of the site could be considered.

- The site is located within Teddington's main centre boundary and partly designated as a key shopping frontage. The building is partly designated as Building of Townscape Merit.
- The site is subject to being declared surplus to requirements by the Royal Mail.
- The Council's Retail Study forecasts a requirement for ca. 2000sqm (gross) of A1 to A5 uses for Teddington, of which approximately half of this requirement is for comparison retail.
- This site could accommodate around 400sqm of retail at ground floor.
- Any redevelopment proposal should provide for commercial / retail on the ground floor, particularly facing the High Street (taking account of the Building of Townscape Merit designation and subject to feasibility and viability of altering the elevations).
- As this is a site in one of the borough's main centres, there is an expectation that any proposal provides employment floorspace, particularly B1 offices.
- Only if other commercial or employment generating uses have been explored and options discounted in line with other policies in this Plan, would the provision of housing, including affordable housing, in upper floors and to the rear of the site as part of a mixed use scheme, be considered as a potential redevelopment option.
- Detailed guidance on design and local character for any redevelopment proposal will also be set out in the Village Planning Guidance SPD for Teddington and Hampton Wick.



#### **SA 7 Strathmore Centre, Strathmore Road, Teddington**

Social and community infrastructure uses are the most appropriate land uses for this site.

- This site has an existing social infrastructure use, which provides a complete range of child-care services for children up to and including Year 6, as well as acting as a nursery to pre-school aged children.
- It is acknowledged that the site has currently poor access provision; it is also located in a low Public Transport Accessibility Level (PTAL) area
- There is an increasing need for the provision for childcare facilities and nurseries in the borough.
- This site, due to its location in a primarily residential area and its proximity to Stanley School and St James's school, makes it ideal for the provision of nurseries and other child-care services.
- Proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way or elsewhere in a convenient alternative location accessible to the current community it supports.
- Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with affordable housing and on-site car parking be considered as a potential redevelopment option.
- Detailed guidance on design and local character for any redevelopment proposal will also be set out in the Village Planning Guidance SPD for Teddington and Hampton Wick.





### SA 8 St Mary's University, Twickenham

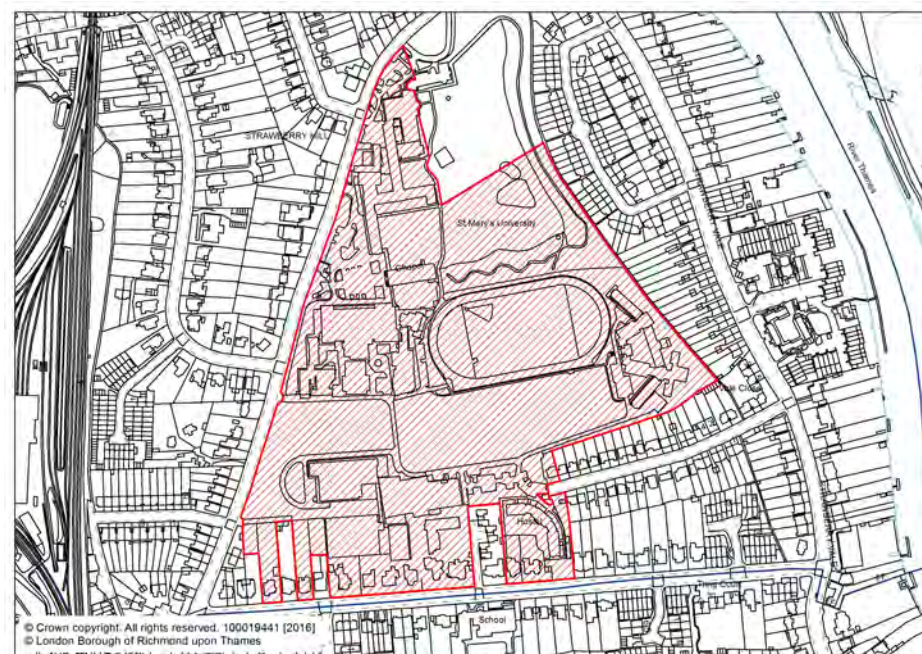
Retention and upgrading of St Mary's University and its associated teaching, sport and student residential accommodation. Upgrade works to include refurbishment, adaptation, extensions and new build elements on site where appropriate.

A Masterplan and/or site development brief, together with new estates and student accommodation strategies, will be prepared in conjunction with the Council. This will guide future development for St Mary's University, both on and off site.

- There is a need to take account of the growing demand for university places.
- There is a need to improve and upgrade the existing facilities at St Mary's University as well as a need to provide additional educational floorspace, student residential accommodation and other associated facilities.
- The Council will support and work with St Mary's University to ensure it remains a highly regarded, competitive and viable higher education facility in the future and to assist in meeting the future educational needs of students.
- It is acknowledged that this is a very constrained site, with the majority of land not built on designated as Metropolitan Open Land. There are also Listed Buildings, Buildings of Townscape Merit as well as sports playing fields.
- Any development proposal has to respect the special and unique location and setting of St Mary's University, including the adjoining Grade I Listed Building (Strawberry Hill House) and the associated Historic Park and Garden.
- The Council will work with the University on a Masterplan for the longer term upgrading of their sites to meet the demand for additional

teaching, sport and student residential accommodation, taking account of existing site constraints.

- Detailed guidance on design and local character for any redevelopment proposal will also be set out in the relevant Village Planning Guidance SPD.



#### **SA 9 Richmond upon Thames College, Twickenham**

Redevelopment to provide a new replacement college, science / technology / engineering / maths centre, technical hub (B1), a new secondary school and special education needs school, sports centre as well as residential including affordable housing. Upgrading of the playing field to the south of the college, including the installation of a new artificial grass (3G) playing pitch.

- There is a clear identified need for a new campus for education and enterprise, including in particular a new secondary school.
- A comprehensive redevelopment scheme is supported on this site, providing for a variety of educational needs in the borough, together with associated supporting residential development.
- Multi-use is sought for the educational and sports facilities, in line with other policies in this Plan.
- The Council will work closely with partners, including Transport for London and Harlequins Rugby Football Club, to ensure the development does not lead to harmful impacts on the local road network.
- Any development proposal is required to protect and, where possible, enhance, the River Crane corridor.
- Detailed guidance on design and local character for any redevelopment proposal will also be set out in the relevant Village Planning Guidance SPD.

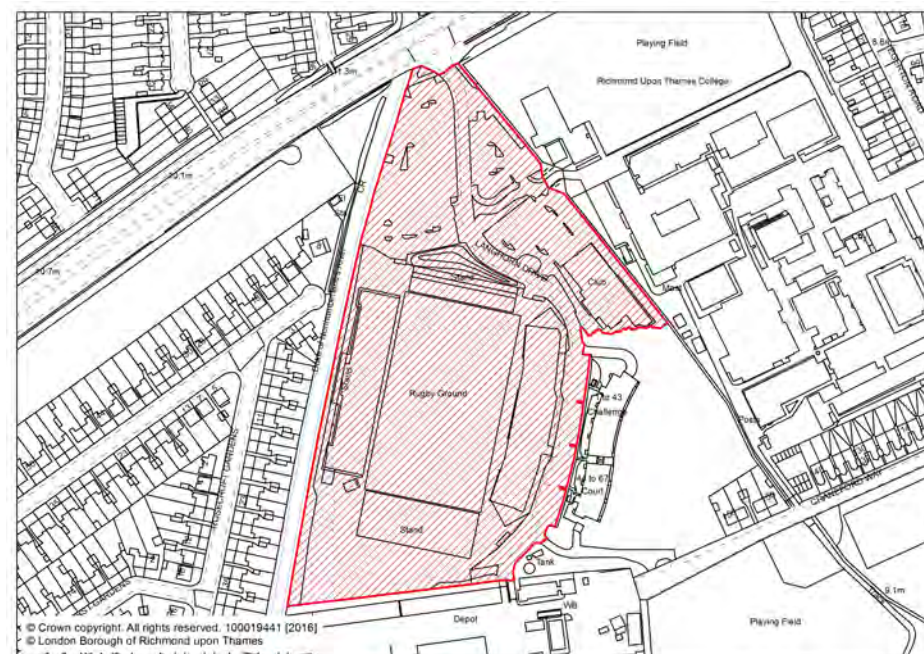




### SA 10 The Stoop (Harlequins Rugby Football Club), Twickenham

The Council supports the continued use of the grounds for sports uses. Appropriate additional facilities including a new north stand, indoor leisure, hotel or business uses, may be supported provided that they are complementary to the main use of the site as a sports ground.

- There is a need to retain, and where possible enhance, the continued use of this site as a sports ground.
- The Council will work in partnership with Harlequins RFC to understand the potential need for associated new facilities, such as a new north stand, indoor leisure (gym/training facilities), business uses or potentially a hotel.
- Any additional uses need to be complementary to the main use of the site as a sports ground; new uses should therefore be associated with, and not detract from, the main sports use of this site.
- Multi-use is sought for the sports and associated facilities, in line with other policies in this Plan.
- The Council will work closely with partners, including Transport for London and Harlequins RFC, to ensure the development does not lead to harmful impacts on the local road network.
- Any development proposal is required to protect and, where possible, enhance, the River Crane corridor.
- The Council is committed to working in partnership with Harlequins RFC to develop a Masterplan, which should set out the long-term strategy for development of this site.
- Detailed guidance on design and local character for any redevelopment proposal will also be set out in the relevant Village Planning Guidance SPD.

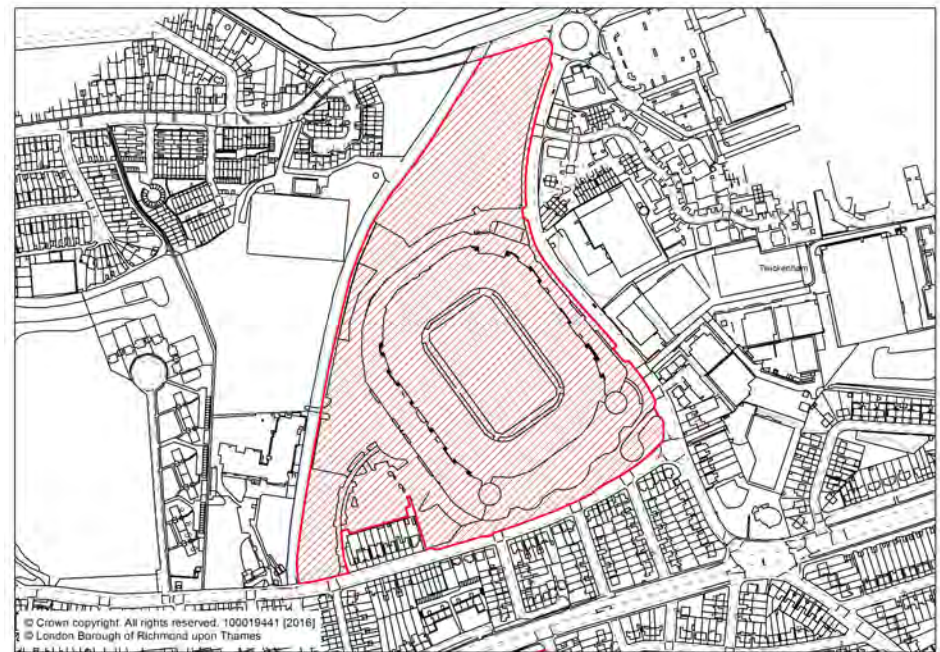


#### SA 11 Twickenham Stadium, Twickenham

The Council supports the continued use of the grounds for sports uses. Appropriate additional facilities including a new east and north stand, indoor leisure, hotel or business uses, as well as hospitality and conference facilities, may be supported provided that they are complementary to the main use of the site as a sports ground.

- There is a need to retain, and where possible enhance, this nationally important sporting venue with its associated facilities.
- The Council will work in partnership with the Rugby Football Union (RFU) to understand the potential need for associated new and complementary facilities such as a hotel, leisure centre, training facilities as well as hospitality and conference facilities. The applicant will have to demonstrate that additional facilities do not lead to harmful impacts on the vitality and viability of Twickenham centre.
- Multi-use is sought for the sports and associated facilities, in line with other policies in this Plan.
- There is a general need for new office floorspace in the borough and in the event of an area of the site being declared surplus to requirements, the opportunity to provide for employment floorspace, such as offices or a business park, should be firstly explored. A mixed use scheme, with residential including affordable housing, may also be considered appropriate provided that other sporting and associated uses, including employment, have been fully investigated and that the mixed / residential use is compatible with the main use of the site, i.e. a national stadium, also taking into account the presence of the existing sewerage treatment works to the north of the site.
- There is a need to retain sufficient parking, particularly for coaches, servicing facilities and space for spectators and related services. Any further development should not lead to harmful impacts on parking, congestion and the wider local road network.

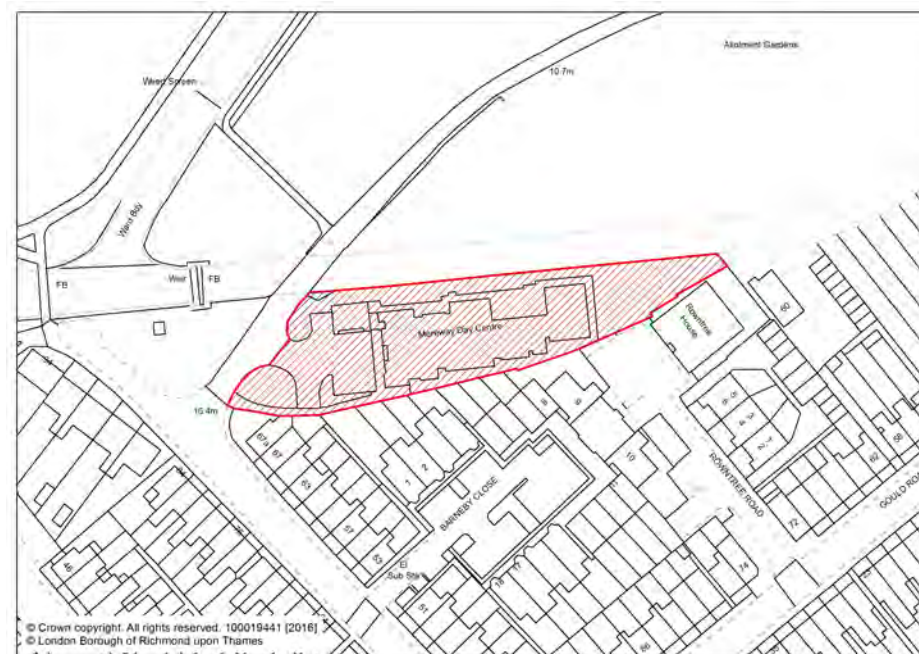
- Any development proposal is required to protect and, where possible, enhance, the Duke of Northumberland River and the associated Metropolitan Open Land.
- The Council is committed to working in partnership with the RFU to develop a Masterplan, which should set out the long-term strategy for development of this site.
- Detailed guidance on design and local character for any redevelopment proposal will also be set out in the relevant Village Planning Guidance SPD.



**SA 12 Mereway Day Centre, Mereway Road, Twickenham**

Social and community infrastructure uses are the most appropriate land uses for this site.

- There is a disused day centre on this site.
- There is an increasing need for the provision of childcare facilities and nurseries in the borough.
- This is an existing social infrastructure site and due to its location in a primarily residential area, it could provide an ideal location for the provision of nurseries and other child-care services.
- It is acknowledged that the site has currently poor access provision; it is also located in a low Public Transport Accessibility Level (PTAL) area.
- Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with affordable housing and on-site car parking be considered as a potential redevelopment option.
- Detailed guidance on design and local character for any redevelopment proposal will also be set out in the relevant Village Planning Guidance SPD.





#### SA 13 Telephone Exchange, Whitton

If the site is declared surplus to requirements, appropriate land uses include employment and social infrastructure or other appropriate main centre uses. Any proposal should provide for employment floorspace, including B1 offices. A mixed use scheme with housing, including affordable housing, could be considered.

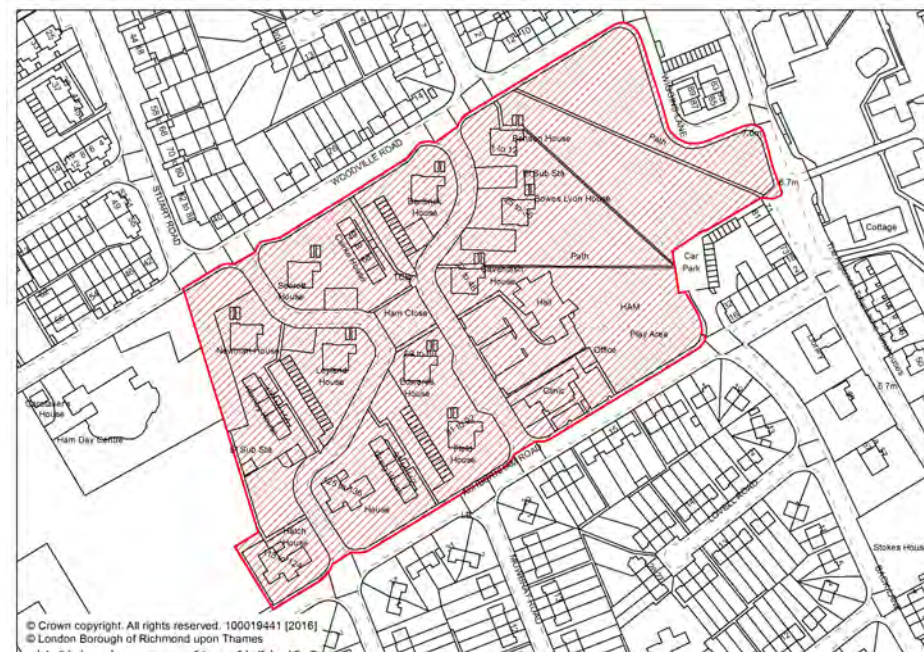
- The site is located within Whitton's main centre boundary.
- The site is subject to being declared surplus to requirements by British Telecom.
- As this is a site in one of the borough's main centres, there is an expectation that any proposal provides employment floorspace, particularly B1 offices.
- Any redevelopment proposal should provide for employment and social infrastructure or other appropriate main centre uses.
- Only if other main centre uses as well as social infrastructure or community uses have been explored and options discounted in line with other policies in this Plan, would a mixed use scheme with housing, including affordable housing, be considered as a potential redevelopment option.
- The opportunity should be taken for a comprehensive redevelopment of the area and ensure that the site establishes a positive relationship with the surrounding area, including the car park, library and high street. This should include increased permeability for pedestrians and cyclists from this site through the car park to the High Street.
- The applicant/owner will be expected to work together with the Council and adjoining landowners to bring forward a scheme that contributes to the vitality and viability of Whitton centre.
- Detailed guidance on design and local character for the redevelopment of this site is set out in the Whitton and Heathfield Village Planning Guidance SPD.



The Council supports the regeneration of Ham Close and will work in cooperation with Richmond Housing Partnership in order to rejuvenate Ham Close and its surrounding area.

A comprehensive redevelopment of this site, including demolition of the existing buildings and new build re-provision of all residential and non-residential buildings, plus the provision of additional new residential accommodation, will be supported.

- Richmond Housing Partnership is the freeholder of the 192 flats at Ham Close.
- The flats are generally of poor construction, with poor insulation by modern standards, and many have condensation and damp issues. The blocks of flats do not have lifts, thus leaving a number of flats inaccessible to people with disabilities.
- Any redevelopment proposal has to respond to the unique and distinctive character of Ham Close.
- There is a need to retain, and where possible enhance, the landscape and existing green spaces, including the Green, as well as trees wherever possible.
- Optimising the use of the land by providing high quality living spaces for both existing as well as new residents of Ham Close.
- Servicing and car parking should be provided as part of the regeneration of the area without compromising amenity and townscape qualities.
- The Council will work in cooperation with Richmond Housing Partnership to develop a Masterplan for this site, which will set out the principles and parameters for redevelopment.
- Further information can be found on the dedicated [Ham Close website](#).
- There is also a need to take account of the emerging Ham and Petersham Neighbourhood Plan, which may set out further guidance on the design and appearance of any development proposal.





#### SA 15 Cassel Hospital, Ham Common, Ham

If the site is declared surplus to requirements, social and community infrastructure uses are the most appropriate land uses for this site. Conversion or potential redevelopment for residential uses could be considered if it enables the protection and restoration of the Listed Buildings.

- The site is owned by the West London Mental Health Trust and provides national specialist assessment and treatment services for young people and adults with complex personality disorders.
- It is acknowledged that any proposal would be subject to the hospital being declared surplus to requirements by the NHS Trust and will be dependent on their decision on how much of the site they need to retain for their own future needs.
- If the site is declared surplus to requirements, in whole or part, appropriate land uses include social and community infrastructure uses.
- Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with affordable housing and on-site car parking be considered as a potential redevelopment option.
- It is acknowledged that conversion or potential redevelopment for enabling residential uses may be needed to support the protection and restoration of the Listed Buildings; residential uses should however be limited to the minimum necessary to achieve viability, in line with Historic England guidance on 'Enabling Development and the Conservation of Significant Places'.

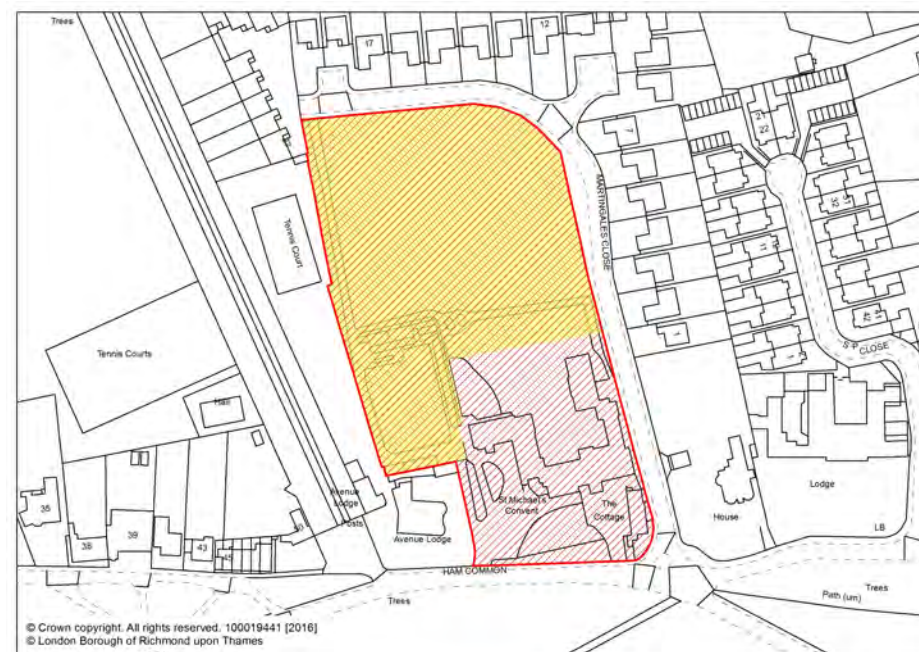
- The grounds to the rear are designated as both Other Site of Nature Importance and Other Open Land of Townscape Importance and development in this area would not be acceptable.
- There is also a need to take account of the emerging Ham and Petersham Neighbourhood Plan, which may set out further guidance on the design and appearance of any development proposal.



### SA 16 St Michael's Convent, Ham Common

If the site is declared surplus to requirements, social and community infrastructure uses are the most appropriate land uses for this site. Conversion or potential redevelopment for residential uses could be considered if it enables the protection and restoration of the Listed Buildings.

- The site is subject to being declared surplus to requirements by the Sisters of the Convent.
- If the site is declared surplus to requirements, appropriate land uses include social and community infrastructure uses.
- Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with affordable housing and on-site car parking be considered as a potential redevelopment option.
- It is acknowledged that conversion or potential redevelopment for enabling residential uses may be needed to support the protection and restoration of the Listed Buildings; residential uses should however be limited to the minimum necessary to achieve viability, in line with Historic England guidance on 'Enabling Development and the Conservation of Significant Places'.
- The gardens (as shown in yellow on the corresponding map) are designated as Other Open Land of Townscape Importance and therefore development in this area would not be acceptable.
- The Council recognises the biodiversity value of the gardens and will therefore investigate whether the site merits protection as Other Site of Nature Importance (OSNI).
- There is also a need to take account of the emerging Ham and Petersham Neighbourhood Plan, which may set out further guidance on the design and appearance of any development proposal.



#### SA 17 Ryde House, East Twickenham

Any redevelopment proposal for this site will be required to prioritise the provision of a new 2-form entry primary school. In conjunction with the educational use, the provision of retail is considered appropriate in this location.

- The site is located within the East Twickenham local centre.
- There is a clear need for a new 2-form of entry primary school in the East Twickenham area as set out in the Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to prioritise the provision of education facilities.
- The site is owned by a supermarket and lies within a local centre. Therefore, a mixed use scheme, consisting of retail and a primary school, is appropriate.
- The Council's Retail Study suggests this site could provide approximately 1,000sqm gross of retail space at ground floor level.
- The introduction of a retail use on the ground floor facing Richmond Road should add to the viability and vitality of this centre.
- Detailed guidance on design and local character for the redevelopment of this site is set out in the East Twickenham Village Planning Guidance SPD.



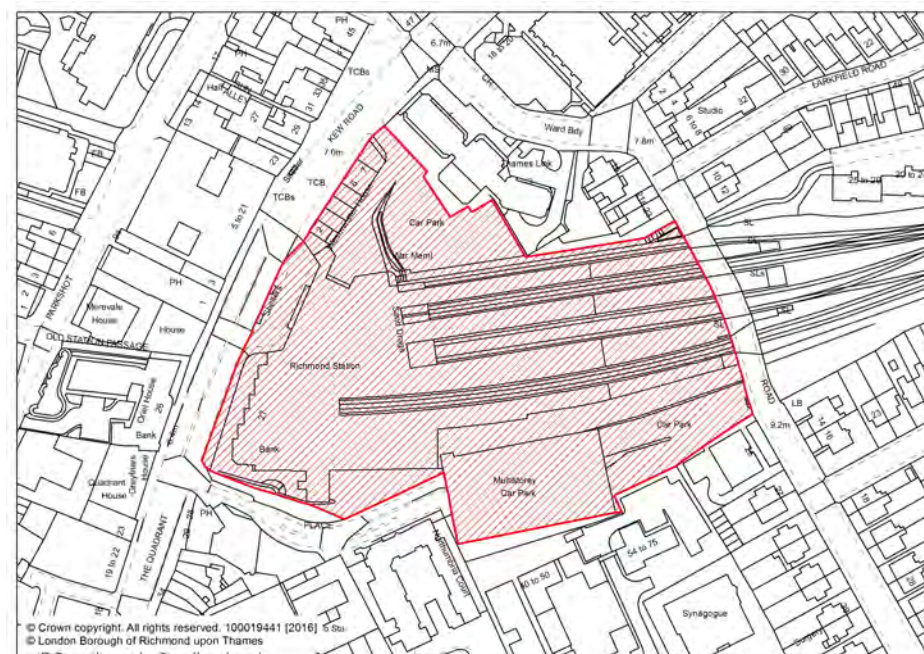


### SA 18 Richmond Station, Richmond

Comprehensive redevelopment to provide an improved transport interchange and an appropriate mix of main centre uses. This includes as a priority the provision of retail floorspace as well as employment floorspace. Appropriate main centre uses, such as other employment generating uses as well as social infrastructure and community uses should also be provided. The provision of housing (including affordable housing) in upper floors as part of a mixed use scheme would be appropriate.

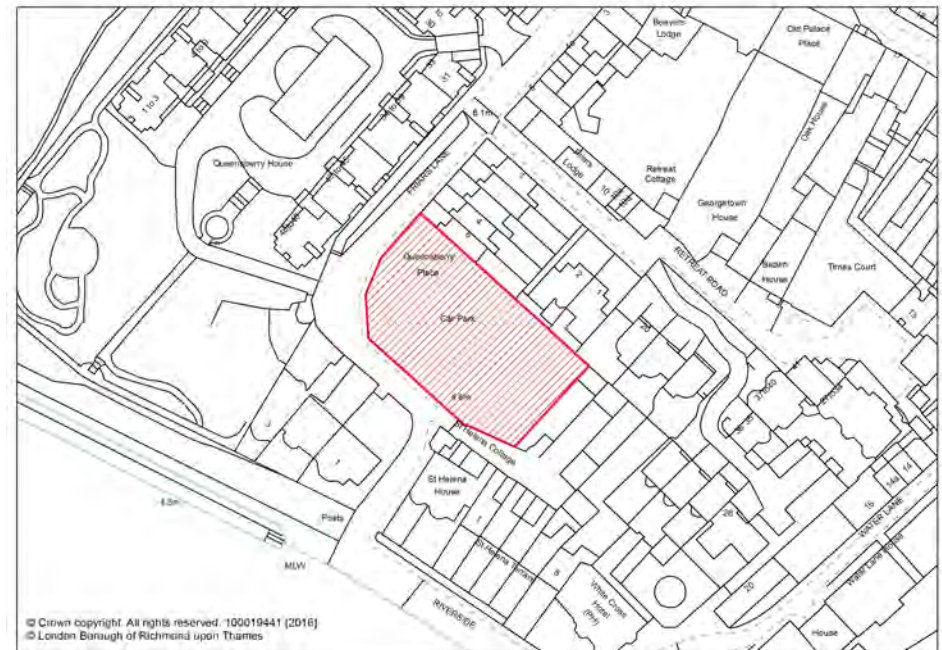
- This is a key development site and gateway into Richmond main centre.
- There is a need for comprehensive redevelopment, including transport interchange improvements (both National Rail and London Underground).
- The Council's Retail Study forecasts a requirement for approximately 10,000sqm (gross) of retail floorspace. This site plays a key role in delivering this requirement.
- This site is located in the borough's largest centre and therefore there is an expectation that any proposal makes a substantial provision of employment floorspace, particularly B1 offices.
- An appropriate mix of main centre uses should bring additional benefits to Richmond centre and enhance its vitality and viability by complementing and linking well with the surrounding areas. Therefore, other uses, such as for community, leisure and entertainment, would also be appropriate.
- The provision of housing (including affordable housing) in upper floors as part of a mixed use scheme would be appropriate.

- The Council has produced and adopted a [development brief](#) for this site, which provides further guidance on the site's characteristics, constraints, land use and development opportunities.
- Detailed guidance on design and local character for the redevelopment of this site is also set out in the Richmond Village Planning Guidance SPD.



The Council supports the redevelopment of the existing under-utilised car park to provide housing, including affordable housing.

- The evidence suggests that this is an under-utilised existing car park and that there is sufficient space in other Richmond car parks.
- The principal for the redevelopment of this site for residential use was established in 2005 as part of the Unitary Development Plan.
- The Council considers that the provision of housing would optimise the use of this site.
- Any redevelopment scheme should enhance the setting of the Conservation Area as well and the surrounding Grade II Listed Buildings.
- The Council has produced and adopted a [development brief](#) for this site, which provides further guidance on the site's characteristics, constraints, land use and development opportunities.
- Detailed guidance on design and local character for the redevelopment of this site is also set out in the Richmond Village Planning Guidance SPD.

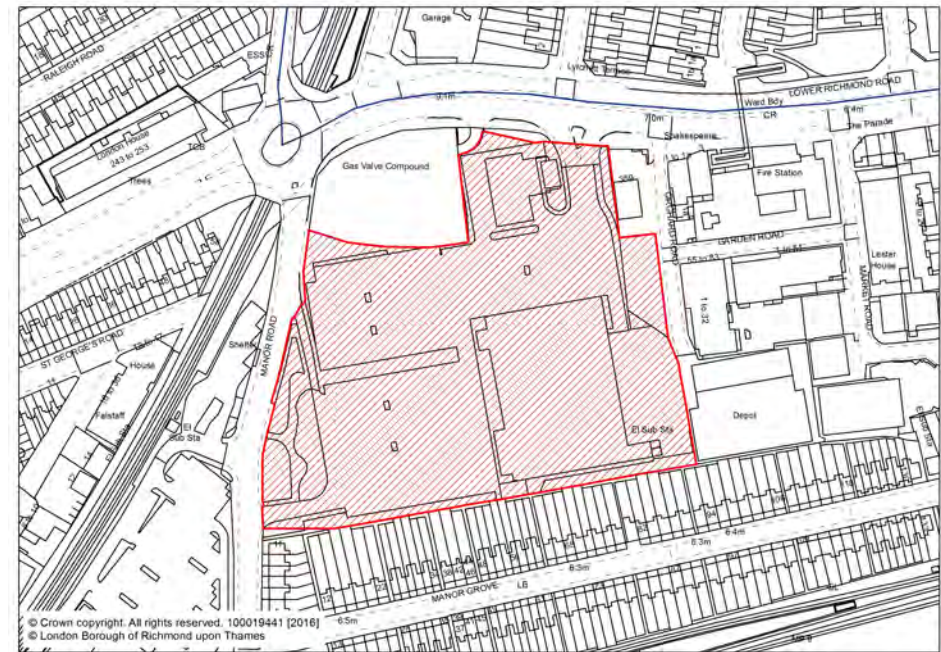




**SA 20 Sainsbury's, Lower Richmond Road, Richmond**

The Council will support comprehensive redevelopment of this site to provide for retail and residential uses. The continued use of the site as a foodstore and the reprovision of the existing retail floorspace is required.

- The existing foodstore is well established and a key facility for the local community.
- Redevelopment of this foodstore provides an opportunity to optimise the use of the site.
- Any redevelopment proposal will be required to retain and/or reprovide the existing retail floorspace.
- There is a need for housing in the borough and this site is considered to be suitable for a substantial provision of new housing units.
- There is an expectation that any redevelopment proposal should provide public realm benefits, including improvements to the visual appearance of the area.
- An analysis of the existing character of the area, including opportunities for improvement as well as design guidance, is set out in the Richmond Village Planning Guidance SPD.

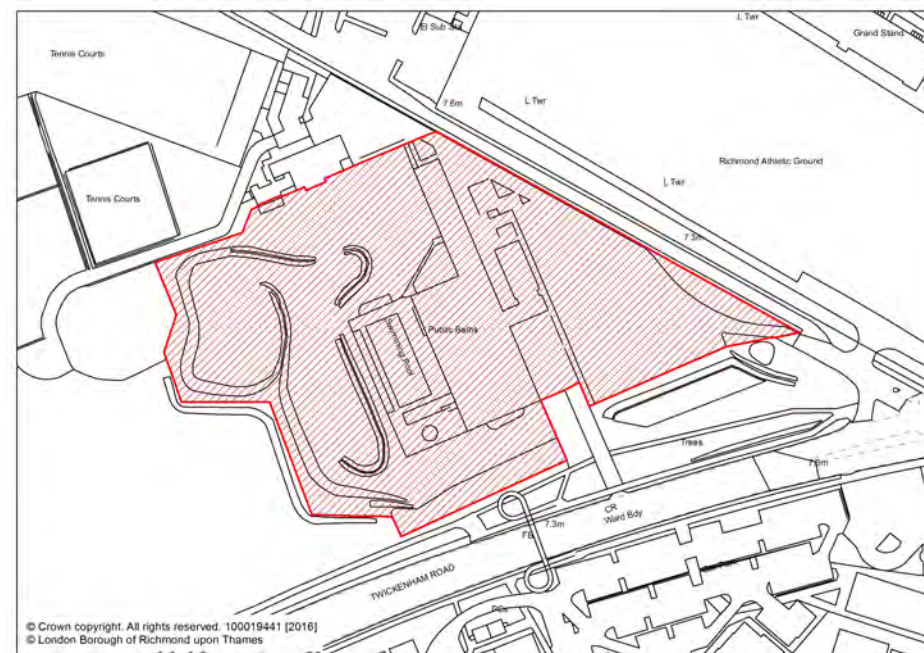


#### SA 21 Pools on the Park and surroundings, Richmond

The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional leisure facilities, community and other complementary uses will be supported provided they meet identified needs and do not detract from the main use of the site as a publicly accessible swimming facility.

- The Council's Indoor Sports Facility Needs Assessment states that there is a concern regarding the ageing stock on this site and this facility needs substantial works and upgrading. A particular concern raised in the Assessment is the cost of maintaining and running the facility due to its age. Furthermore the future population growth of the borough will place further pressure on capacity.
- The Indoor Sports Facility Needs Assessment also suggests that ideally the building should be rebuilt to offer residents a modern swimming experience. In addition, the gym facilities require investment to match the standards in other membership facilities.
- As the existing building is listed as Grade II and the site lies within a Grade I Historic Park and Garden and Conservation Area any proposals will be considered within the context of these designations.
- Comments in relation to the Pools on the Park site were received in relation to consultations undertaken by the Council in 2015 in relation to the Village Plans including:
  - the Pools are seen as a valued asset in the community;
  - the complex looks 'tired' and is seen as unattractive by some local residents;

- the internal layout is poorly configured and impacts on the attractiveness of the facilities for members; the changing rooms and toddler paddling pool need upgrading; and
- some residents questioned the Listed status of the building – its design was not considered suitable for its location having a harsh concrete and rigid office block appearance.
- A SPD for the overall Old Deer Park Conservation Area is currently being developed by the Council.

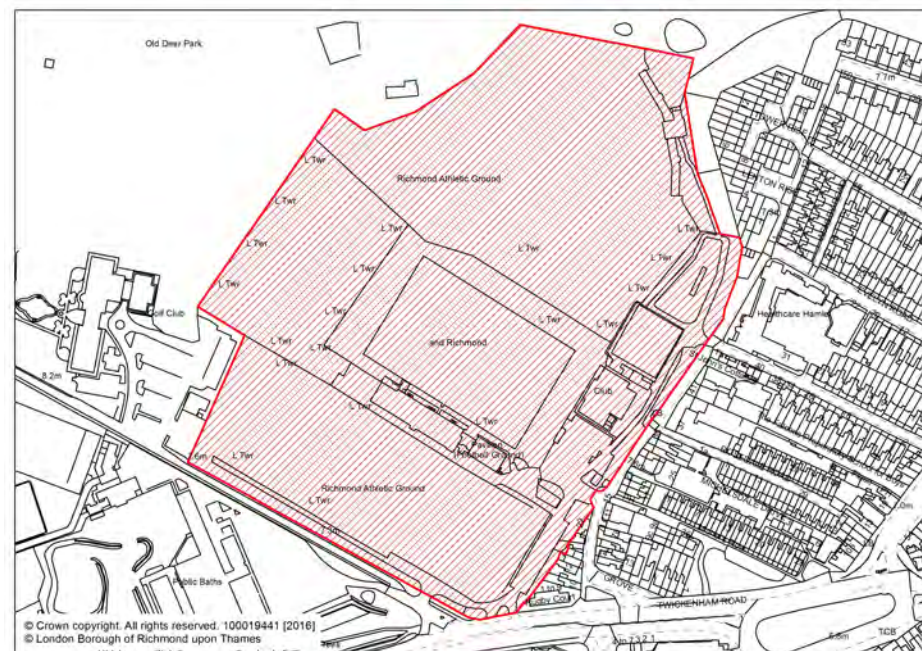




The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional associated leisure facilities and other complementary uses could be incorporated provided they meet identified needs, do not detract from the main use of the site as a sports ground, and take account of the Metropolitan Open Land (MOL) and historic designations.

- The evidence as set out in the Council's Playing Pitch Strategy suggests that the sports ground needs to be retained; however, improvements are required in relation to the existing facilities including to the changing facilities and the quality of the playing pitches as a result of them currently being 'overplayed'.
- The Council supports the principle of improvement and upgrading of facilities to support the sports uses on this site.
- The whole site is designated as MOL and therefore inappropriate development would not be acceptable. As the original grandstand is listed as Grade II and the site lies within a Grade I Historic Park and Garden and Conservation Area, any proposals will be considered within the context of these designations.
- It is acknowledged that any improvement and upgrading of the existing sports facilities may require additional development to support the costs of improving/replacing existing facilities. Recognising the historic and policy designations relating to the site any such development would need to be clearly justified, be for associated leisure and other complementary uses and provide for a comprehensive development approach for the whole site, and demonstrate that the character and appearance of the site as well as its historic significance is improved and enhanced.

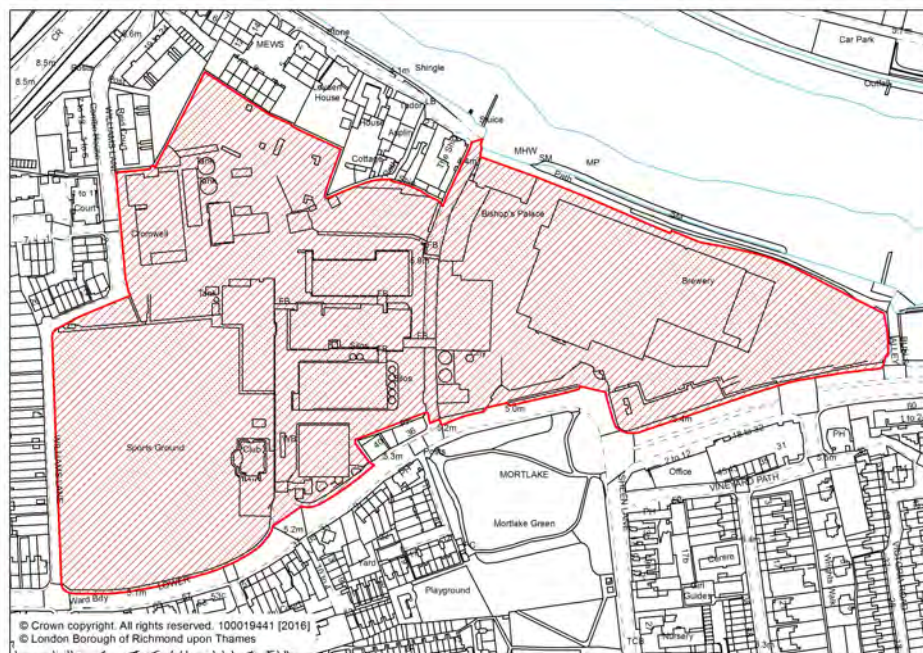
- Comments in respect of the Richmond Athletic Ground site were received during consultations undertaken by the Council in 2015 relation to the Village Plans including:
  - residents enjoy using the facilities;
  - landscaping improvements are needed;
  - the main grandstand, and the Cannons Health Club and Old Golf Driving Range buildings and surroundings are in a poor state, with some suggesting they need to be demolished and rebuilt; and
  - the desire to see the rugby clubs stay in Richmond.
- A SPD for the overall Old Deer Park Conservation Area is currently being developed by the Council.



#### **SA 23 Stag Brewery, Lower Richmond Road, Mortlake**

The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.

- The brewery operations on this site have ceased at the end of 2015; the site has been marketed and sold.
- There is a need to create a new village heart and centre for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities.
- There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area, as set out in the Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.
- Whilst this site is not located within a main centre, it falls within the Mortlake Area of Mixed Use. Therefore, it is expected that this site will provide a substantial mix of employment uses (B uses), including lower cost units suitable for small businesses, creative industries and scientific and technical businesses including green technology. Other employment generating uses will also be supported.
- Retail and other commercial uses, such as cafés and restaurants, will add to the vibrancy of the new centre as well as contributing to the provision of important local employment opportunities.
- Incorporating a mix of uses, including social infrastructure and community as well as leisure, sport and health uses, and attractive frontages would contribute to creating an inviting and vibrant new centre.
- The provision of residential uses (including affordable housing), will ensure that the new village heart becomes a vibrant centre for new communities.
- The existing Buildings of Townscape Merit should be retained; the reuse of these historic buildings offers an excellent opportunity to ensure the site incorporates and promotes a cultural and historic legacy, for example by providing an on-site museum.
- Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community.
- There may be an opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site. The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where possible improvements to public transport facilities can be secured as part of any development proposal.
- The Council has produced and adopted a [development brief](#) for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities.
- Guidance on design and local character for the area is also set out in the Mortlake Village Planning Guidance SPD.

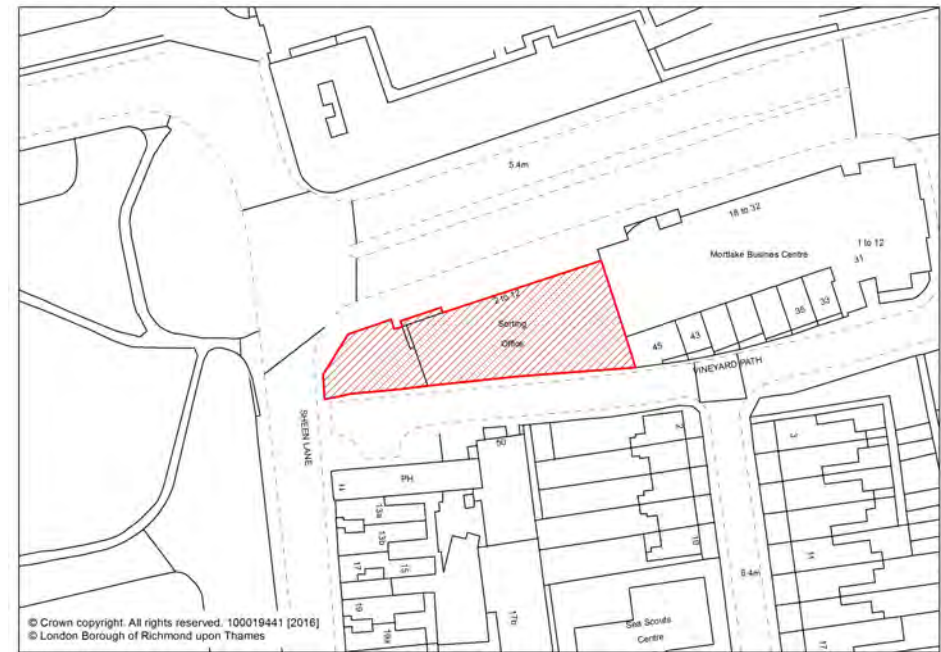




#### **SA 24 Mortlake and Barnes Delivery Office, Mortlake**

If the site is declared surplus to requirements, appropriate land uses include employment or other commercial and retail uses.

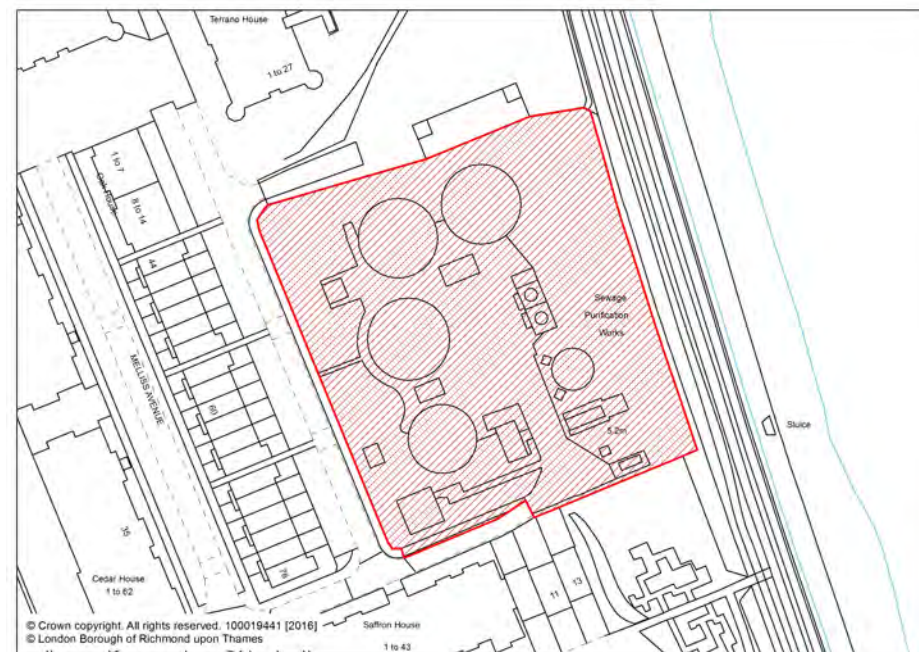
- The site is located within the Mortlake Area of Mixed Use.
- The site is subject to being declared surplus to requirements by the Royal Mail.
- The evidence suggests there is a need for employment or other commercial and retail uses in this area. Such provision should create an attractive frontage to the High Street.
- Only if employment and other commercial or employment generating uses have been explored and options discounted in line with other policies in this Plan, would the provision of housing (including affordable housing) in upper floors as part of a mixed use scheme be considered as a potential redevelopment option.
- Detailed guidance on design and local character for any redevelopment proposal on this site is also set out in the Mortlake Village Planning Guidance SPD.



**SA 25 Kew Biothane Plant, Mellis Avenue, Kew**

The Council supports the redevelopment of this site to provide for residential uses, including affordable housing, and associated open space provision.

- This site is owned by Thames Water Utilities and its main use was the processing of effluent from the brewing operations on the Stag Brewery site.
- The site has been declared surplus to requirements since the brewery operations ceased.
- Due to its location in a largely residential area, redevelopment for housing, including affordable housing, is considered appropriate.
- The redevelopment of this site provides an opportunity to enhance the environment whilst meeting housing needs.
- Parts of the site are designated as Metropolitan Open Land and development in this area would not be acceptable. There is an expectation that any redevelopment proposal improves the character and openness of the Metropolitan Open Land.
- Detailed guidance on design and local character for any redevelopment proposal is also set out in the Kew Village Planning Guidance SPD.



#### **SA 26 Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen**

If the Telephone Exchange is declared surplus to requirements, appropriate land uses for the whole area include employment and commercial uses as well as community and social infrastructure uses. A mixed use scheme with housing (including affordable housing) in upper floors and to the rear could be considered.

- The majority of the site is within East Sheen's main centre boundary.
- The Telephone Exchange is subject to being declared surplus to requirements by British Telecom.
- 172-176 is in commercial use and opposite to a designated secondary shopping frontage.
- If the Telephone Exchange becomes surplus to requirements, the opportunity should be taken for a comprehensive redevelopment of the whole area.
- As this is a site in one of the borough's main centres, there is an expectation that any proposal provides employment floorspace, particularly B1 offices.
- Any redevelopment proposal should provide for employment or commercial floorspace as well as community and social infrastructure uses. Such provision should create an attractive frontage along Upper Richmond Road West.
- Only if employment and other commercial as well as social infrastructure uses have been explored and options discounted in line with other policies in this Plan, would the provision of housing (including affordable housing) in upper floors and to the rear of the site as part of a mixed use scheme be considered as a potential redevelopment option.
- The Council acknowledges that the area encompasses two different sites in different ownership; however, the Council will expect the

landowners to work together to bring forward a scheme that contributes to the vitality and viability of East Sheen centre.

- Detailed guidance on design and local character for any redevelopment proposal of this is also set out in the East Sheen Village Planning Guidance SPD.

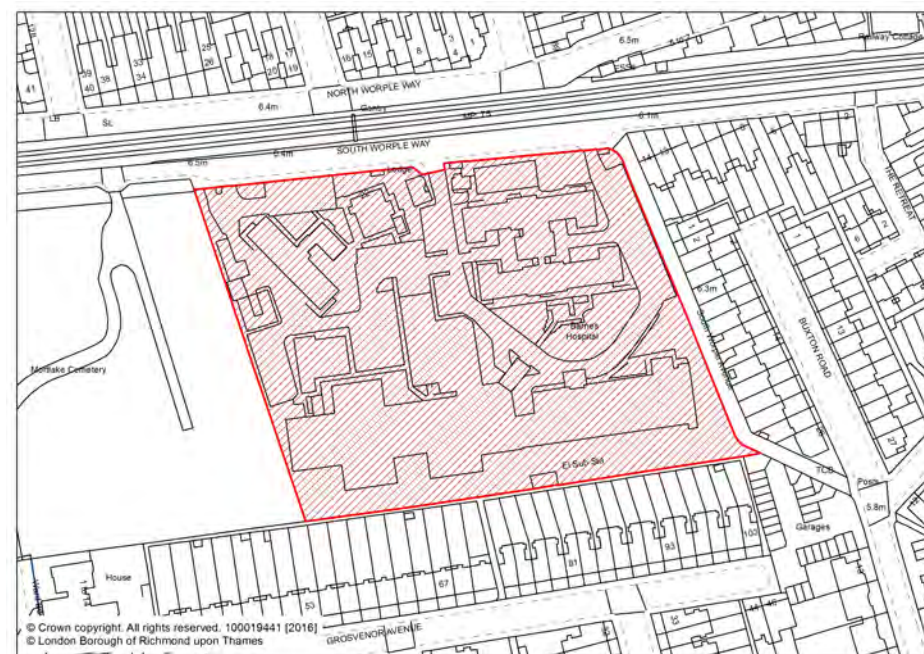




### SA 27 Barnes Hospital, East Sheen

If the site is declared surplus to requirements, appropriate land uses include social and community infrastructure uses. Any redevelopment proposal for this site will be required to prioritise the provision of a new 2-form entry primary school.

- The site is owned by the South West London and St George's Mental Health NHS Trust.
- It is acknowledged that the mix of uses on this site will depend on the Mental Health Trust's decision on how much of the site they need to retain for their own future needs.
- There is a clear need for a new 2-form of entry primary school in this area as set out in the Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to prioritise the provision of the educational use.
- Appropriate land uses include social and community infrastructure uses (including education).
- Only if community and social infrastructure uses have been explored and options discounted in line with other policies in this Plan, would the provision of housing (including affordable housing) and potential for extra-care housing, be considered as a potential redevelopment option.
- The Council expects that the most important existing Buildings of Townscape are retained.
- Detailed guidance on design and local character for the redevelopment of this site is set out in the East Sheen Village Planning Guidance SPD.



#### Change to MOL boundary at Harroddian School, Barnes

Remove the area shown as cross-hatched from the MOL designation.

This change in the MOL boundary was agreed by the Council and Harroddian School as part of the emerging work on the Site Allocations Plan in 2014, where it was recognised and acknowledged that the cluster of buildings in the south-western corner of the site can be clearly distinguished from the predominately open character of the remainder of the site.





# Implementation 13

Pre-Publication Local Plan

## 13 Implementation

### 13.1 Implementation of the Local Plan

**13.1.1** The Local Plan will be implemented and delivered through a combination of private sector investment, the work of other agencies and bodies and the Council's own strategies and initiatives. The majority of new development identified in the Plan's site allocations, particularly investments in new infrastructure, housing and jobs, will be delivered by the private sector. The Infrastructure Delivery Plan and Infrastructure Delivery Schedule (see section 13.2 'Infrastructure Delivery' of this Plan), set out the range of plans, programmes and strategies, including those of partner organisations and agencies. The implementation of the Council's own strategies and plans as well as those of key partner organisations will be essential to the delivery of the Strategic Vision.

**13.1.2** In addition, other public bodies and agencies, such as Transport for London, have a key role to play in delivering the required transport improvements that are necessary to accommodate the anticipated growth in the borough and to implement the Spatial Strategy. The Council will therefore continue to work with all its partners and use all its relevant powers and programmes to ensure that essential infrastructure will be delivered.

**13.1.3** At least 3,150 homes will need to be built in the borough during the period of 2015-2025. These new homes will largely be delivered by the private sector in residential-led as well as mixed use schemes. The main locations for new housing across the borough are identified in the Spatial Strategy and the relevant Housing policies of this Plan. Affordable housing will be secured through Planning Obligations, by private developers and Registered Providers (RPs) of affordable housing. The Council will support the delivery of further affordable housing that will be provided by RPs' own schemes. The Council's approach to securing affordable housing through Planning Obligations is set out in its Affordable Housing SPD. Detailed monitoring of the overall housing provision and the delivery of affordable housing takes place as part of the Council's annual Authority's

Monitoring Report - visit the [Council's website](http://www.richmond.gov.uk/authority_monitoring_report.htm) for further information at [www.richmond.gov.uk/authority\\_monitoring\\_report.htm](http://www.richmond.gov.uk/authority_monitoring_report.htm). Evidence and needs is also reflected in the Council's Strategic Housing Market Assessment.

**13.1.4** The provision of employment space to meet the anticipated growth in the local economy will be delivered by the private sector as part of employment-only or mixed use schemes in locations identified in the Spatial Strategy and Employment policies of this Plan. The provision of flexible, small units to serve the particular needs of the borough's local economy will be secured through Planning Obligations in appropriate locations.

**13.1.5** The Spatial Strategy highlights the need for 21,700sqm (gross) of retail floorspace in the borough by 2024. This figure already takes account of past and emerging structural changes within the retail sector, such as the growth in internet shopping. New and additional retail floorspace will be delivered by the private sector as part of mixed use redevelopment schemes within the borough's centres and site allocations as identified in this Plan. In particular, Richmond Station is expected to make a substantial contribution to the identified retail floorspace need of approximately 10,000sqm.

**13.1.6** Improvements to transport infrastructure, particularly to public transport as well as cycling and walking, will be essential to the delivery of the Spatial Strategy. The London Plan sets out strategic schemes and proposals for London, a number of which are of relevance to the borough, such as Crossrail 2, London Overground improvements and Southwest Rail ten car capacity. The Council will support improvements to public transport, including enhanced capacity as well as improved bus and rail services and accessibility opportunities. These improvements will largely be delivered by Government, Transport for London and other public transport operating companies. Funding for improvements will be provided in part through the Community Infrastructure Levy, and where appropriate, developer contributions through Planning Obligations will also be sought from relevant development sites. A detailed list of transport projects and

infrastructure requirements is set out in the Council's Infrastructure Delivery Plan and Infrastructure Delivery Schedule (see Section 13.2 'Infrastructure Delivery' of this Plan).

**13.1.7** A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population. Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses:

- Richmond College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college
- Stag Brewery, Mortlake: provision of a new 6-form of entry secondary school, including sixth form
- Ryde House, East Twickenham: provision of a new 2-form of entry primary school
- Barnes Hospital, Barnes: provision of 2-form of entry primary school

**13.1.8** In addition, the Council is undertaking a further review of potential site opportunities for educational uses.

**13.1.9** The Council will work with service providers and developers to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage. New community and social infrastructure facilities are also expected to be delivered on a variety of sites as identified in this Plan. Improvements to open spaces as well as play facilities will be required in line with policy LP 31 in 8.4 'Public Open Space, Play Space, Sport and Recreation'. A detailed list of projects and infrastructure requirements in relation to social infrastructure and community uses is set out in the Council's Infrastructure Delivery Plan and Infrastructure Delivery Schedule (see Section 13.2 'Infrastructure Delivery').

**13.1.10** The activities of other key partner agencies and bodies, such as the Richmond Clinical Commissioning Group (CCG) and NHS partner organisations, who are responsible for delivering health services in the borough, will also contribute to delivering the Strategic Vision and Spatial Strategy.

**13.1.11** The Council, as part of its Uplift programme, will continue to rejuvenate the areas of Whitton, Hampton North, Barnes, Mortlake, Ham, Fulwell and Hampton Hill, which local people say are in need of improvement.

**13.1.12** Further information on the infrastructure required to support a growing population and development in this borough is set out in the following section 13.2 'Infrastructure Delivery'.

## 13.2 Infrastructure Delivery

### Introduction

**13.2.1** Delivery of infrastructure is critical to the delivery of the Strategic Objectives, Vision and Spatial Strategy of the Local Plan. Future development, as set out in this Local Plan, will need to be enabled and supported by the timely delivery of infrastructure. Infrastructure planning ensures that physical and non-physical requirements for an area or development can be delivered in a timely manner. This includes working in partnership with physical, social and green infrastructure providers to establish what infrastructure provision there is in the borough, and identifying any gaps or capacity issues within the existing provision, in order to support sustainable growth in the borough.

**13.2.2** The NPPF sets out that planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. In addition, local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision

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of viable infrastructure necessary to support sustainable development. The NPPF in paragraph 162 states that local planning authorities should work with other authorities and providers to:

- assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and
- take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.

#### Infrastructure to support sustainable growth

**13.2.3** Changes in the population and in particular any population increases and growth as well as changes in needs and demands will influence what community infrastructure is required in the borough. In addition, new development and population growth will require an appropriate level of additional infrastructure to ensure that existing as well as new communities and businesses have the necessary infrastructure, such as school places, health centres and leisure facilities.

**13.2.4** To enable sustainable growth in the borough, the infrastructure requirements of new development will need to be established, and the need for any new infrastructure should be planned in conjunction with new development; this includes for example transport or utilities infrastructure requirements.

**13.2.5** Planning, through the use of the Community Infrastructure Levy and Planning Obligations, is a prime way that the Council can gain the necessary resources to assist in the delivery of this vital infrastructure.

#### Infrastructure Delivery Plan

**13.2.6** The Council's Infrastructure Delivery Plan (IDP) is part of the evidence base that has informed the review of the policies contained within this Plan. The IDP provides an infrastructure assessment for the borough

and it has direct links with both the Local Plan as well as the Community Plan. For the purpose of the Local Plan and the IDP, 'essential community infrastructure' is defined as 'any physical structure, facility or service, whether privately or publicly funded, that supports or enables growing communities'.

**13.2.7** The Community Plan highlights that one of the challenges is the delivery of quality public services within the context of deepening public financial restraints. The Council's IDP supports the production and delivery of the Local Plan as it identifies the future infrastructure and service needs for the borough. More specifically, the IDP:

- provides an analysis of existing infrastructure provision and identifies how well existing needs are met;
- identifies future infrastructure requirements to support new development and a growing population, housing and employment growth
- provides an indication of the potential costs and means and sources of funding the required infrastructure, including public funding, developer contributions and other sources; and
- it provided the basis for setting a well-balanced and reasonable charge for the Community Infrastructure Levy (CIL). The Council's CIL was introduced in November 2014.

**13.2.8** The scope of facilities that have been investigated as part of the IDP includes the following:

- Social and community infrastructure including early years education, primary and secondary as well as special needs education, further/higher/adult education, health care (including hospitals and GPs), adult social care, sport facilities including leisure facilities such as sports halls and indoor, community centres, youth centres, libraries, affordable housing as well as arts and culture;
- Emergency services including police, ambulance and fire service;

- Green infrastructure including parks, open spaces, trees and woodlands, allotments, cemeteries and crematoria, play facilities and rivers;
- Utilities and physical infrastructure including electricity, gas, low and zero carbon energy infrastructure, water resources and supply, surface and foul water infrastructure and waste water treatment, flood risk and flood defence infrastructure, waste management and disposal and telecommunications;
- Transport infrastructure including roads and highways, overground and underground railways, buses, cycle facilities, pedestrian facilities, including towpath, river transport (along and across the River Thames), car parking, travel choice, community transport and taxis; and
- Heritage assets.

**13.2.9** The IDP therefore ensures that all infrastructure matters necessary for the achievement of Local Plan Vision and Spatial Strategy as well as the policies and site-specific proposals are embraced.

### Infrastructure Delivery Schedule

**13.2.10** The Local Plan and IDP is supported by the Council's Infrastructure Delivery Schedule (IDS), which sets out the where, what, why, who, and when key infrastructure is required in the borough.

**13.2.11** Whilst the IDP provides the baseline for infrastructure required to support the sustainable growth of the borough, the IDS provides a detailed analysis of the specific infrastructure projects, including where a need/future demand has been identified. It identifies the costs of new required infrastructure/facilities as well as sources of funding. In addition, it details whether the infrastructure project will be needed in the short-/medium-/long-term, and whether it will need to be delivered in phases. Where applicable, it identifies and includes the location of new infrastructure. The IDS also identifies the relevant delivery partners and any other critical elements that need to be taken account of to ensure the delivery of the necessary infrastructure.

**13.2.12** Both the IDP and IDS provide a snap-shot in time and are based on best available information at the time of their production. Needs and demands for infrastructure can change significantly due to unexpected events, for example the opening of a new school may change the demand for school places in a specific area. In addition, they do not provide a definitive or exhaustive list of available funding sources and infrastructure costs as these can also change significantly within a short period of time. Thus, the IDP and IDS are treated as living documents and are therefore monitored and regularly updated. To access the latest IDP and IDS, visit the [Council's website](http://www.richmond.gov.uk/local_plan) at [www.richmond.gov.uk/local\\_plan](http://www.richmond.gov.uk/local_plan), which is also where future updated editions of the IDP and IDS will be published.

### 13.3 Planning Obligations and Financial Contributions

**13.3.1** Planning Obligations under Section 106 of the Town and Country Planning Act 1990 (as amended), commonly known as S106 agreements, are a mechanism which make a development proposal acceptable in planning terms, which would otherwise be unacceptable. The common uses of Planning Obligations are to secure affordable housing and financial contributions to provide infrastructure or affordable housing. However these are not the only uses for a Planning Obligation. It can also

- restrict the development or use of the land in any specified way;
- require specified operations or activities to be carried out in, on, under or over the land;
- require the land to be used in any specified way; or
- require a sum or sums to be paid to the authority on a specified date or dates or periodically.

**13.3.2** Planning Obligations will be sought as appropriate to mitigate the impact of development. The following three statutory tests for the use of Planning Obligations will be applied (in line with the Community Infrastructure Levy Regulations 2010 as amended), and it will have to be demonstrated that that the obligation is:

- necessary to make the development acceptable in planning terms;



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- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

**13.3.3** Therefore, development will be expected to contribute to any additional infrastructure and community needs generated by the development, taking account of the requirements set out in this Plan, the Council's Planning Obligations SPD, Affordable Housing SPD, and the Borough and Mayoral Community Infrastructure Levy. Further details on these documents can be found on the [Council's website](http://www.richmond.gov.uk/local_plan) at [www.richmond.gov.uk/local\\_plan](http://www.richmond.gov.uk/local_plan)

**13.3.4** The Community Infrastructure Levy (CIL) will provide the main means of addressing the infrastructure requirements arising out of developments. However, where policies in the Local Plan require consideration of direct assessment for infrastructure provision, such as for transport, utilities and green infrastructure, the impact on existing infrastructure and the infrastructure requirements arising from new development will need to be clearly established within an application. Mechanisms will need to be secured to ensure delivery in conjunction with the timetable expected for development (also see 13.2 'Infrastructure Delivery').

**13.3.5** The Council's CIL will be spent on local strategic infrastructure in accordance with the Council's adopted Community Infrastructure Levy (CIL) Regulation 123 List, and a proportion of the CIL will be allocated for spending in consultation with the local community. In line with the CIL Regulations, the Council is not able to use CIL contributions for affordable housing. This is why affordable housing is secured through Planning Obligations. In addition, Planning Obligations for site-specific mitigation measures that are necessary to make a development acceptable in planning terms will be used alongside the CIL. Other policy requirements allow for a financial contribution, which will need to be secured by a Planning Obligation. It should be noted that Planning Obligation monies will not be secured for projects or items already on the Council's Regulation 123 List.

**13.3.6** The Council reports annually on Planning Obligation and Council CIL monies received. These are published on the [Council's website](http://www.richmond.gov.uk/local_plan) at [www.richmond.gov.uk/local\\_plan](http://www.richmond.gov.uk/local_plan)

**13.3.7** Viability will be taken into account in accordance with section 13.4 'Ensuring viability and deliverability' of this Plan.

### 13.4 Ensuring viability and deliverability

**13.4.1** The NPPF at paragraph 173 states 'To ensure viability, the costs of any requirements likely to be applied to the development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.'

**13.4.2** The NPPF therefore allows for a profit for the developer, which reflects the risks in developing and funding the scheme.

**13.4.3** The NPPF also allows for a 'return' to encourage the land owner to bring the site forward for development. This 'return' or premium is generally dependent on three factors:

1. The planning status of the site and the lawful alternative uses it can be used for
2. The aspirations and needs of the landowner
3. The need of the local authority to see the scheme developed

**13.4.4** The NPPG provides further guidance on viability and plan making, and viability and decision taking with regard to site specifics. The guidance states that 'In making decisions, the local planning authority will need to understand the impact of Planning Obligations on the proposal. Where an applicant is able to demonstrate to the satisfaction of the local planning authority that the planning obligation would cause the development to be unviable, the local planning authority should be flexible in seeking Planning Obligations. This is particularly relevant for affordable housing contributions which are often the largest single item sought on housing developments.'

These contributions should not be sought without regard to individual scheme viability. The financial viability of the individual scheme should be carefully considered in line with the principles in this guidance.' The guidance then continues to set out some general principles on how the key factors of gross development value, costs, land value and the competitive return to developers and land owners should be calculated and evidenced.

**13.4.5** As set out in section 13.3 'Planning Obligations and Financial Contributions', the Planning Obligations SPD sets out the Council's policies and procedures for securing site-specific developer contributions alongside the Borough's CIL. Further details regarding affordable housing contributions and viability are set out in policy LP 36 in 9.3 'Affordable Housing' and the Affordable Housing SPD. Recent viability testing for the Borough CIL took account of affordable housing policy requirements and a whole plan viability assessment for the Local Plan Review will be undertaken, to continue to ensure the Local Plan is underpinned by a broad understanding of viability.

### 13.5 Monitoring

**13.5.1** Since the adoption of the Core Strategy and Development Management Plan in 2009 and 2011 respectively, the Council has well-established and up-to-date monitoring systems in place for a range of key planning indicators. These monitor the effectiveness of the policies and strategies over time, including against set targets where appropriate. They are essential to ensure that the objectives and ultimately the Spatial Strategy and Strategic Vision are being delivered.

**13.5.2** Indicators for the Council's Core Strategy originally derived from the accompanying Sustainability Appraisal and were set out against each policy area. Additional indicators and targets where appropriate were added to the monitoring framework following the adoption of the Development Management Plan.

**13.5.3** Indicators, and where required targets, are reviewed regularly and where necessary have been amended to ensure the monitoring framework reflects national and regional requirements, and to ensure that the adopted policies continue to be monitored in the most meaningful way.

**13.5.4** Key aspects of monitoring continues to be undertaken on an annual basis and is reported as part of the Authority's Monitoring Reports. The data collected as part of the preparation of the Monitoring Reports also feed into monitoring systems set up by the Greater London Authority (i.e. the London Development Database).

**13.5.5** The monitoring framework will be revised to reflect the adoption of the new Local Plan policies. This revised monitoring framework, informed by the Sustainability Appraisal process, will be developed and presented within the 'Publication' version of this Plan.

**13.5.6** Note that existing indicators, and where applicable targets, in relation to the Twickenham Area Action Plan will not be amended as part of this Local Plan Review.

# Appendix 1 - List of all Local Plan policies 14

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## 14 Appendix 1 - List of all Local Plan policies

**14.0.1** This Appendix provides a summary of all new policies contained within this Local Plan.

### Policies

- Policy LP 1 Local Character and Design Quality
- Policy LP 2 Building Heights
- Policy LP 3 Designated Heritage Assets
- Policy LP 4 Non-Designated Heritage Assets
- Policy LP 5 Views and Vistas
- Policy LP 6 Royal Botanic Gardens, Kew World Heritage Site
- Policy LP 7 Archaeology
- Policy LP 8 Amenity and Living Conditions
- Policy LP 9 Floodlighting
- Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination
- Policy LP 11 Subterranean developments and basements
- Policy LP 12 Green Infrastructure
- Policy LP 13 Green Belt and Metropolitan Open Land
- Policy LP 14 Other Open Land of Townscape Importance
- Policy LP 15 Biodiversity
- Policy LP 16 Trees and Landscape
- Policy LP 17 Green Roofs and Walls
- Policy LP 18 River corridors
- Policy LP 19 Moorings and Floating Structures
- Policy LP 20 Climate Change Adaptation
- Policy LP 21 Flood Risk and Sustainable Drainage
- Policy LP 22 Sustainable Design and Construction
- Policy LP 23 Water Resources and Infrastructure
- Policy LP 24 Waste Management
- Policy LP 25 Development in centres
- Policy LP 26 Retail Frontages

- Policy LP 27 Local Shops, Services and Public Houses
- Policy LP 28 Social and Community Infrastructure
- Policy LP 29 Education and Training
- Policy LP 30 Health and Wellbeing
- Policy LP 31 Public Open Space, Play Space, Sport and Recreation
- Policy LP 32 Allotments and food growing spaces
- Policy LP 33 Telecommunications
- Policy LP 34 New Housing
- Policy LP 35 Housing Mix and Standards
- Policy LP 36 Affordable Housing
- Policy LP 37 Housing Needs of Different Groups
- Policy LP 38 Loss of Housing
- Policy LP 39 Infill, Backland and Backgarden Development
- Policy LP 40 Employment and local economy
- Policy LP 41 Offices
- Policy LP 42 Industrial Land and Business Parks
- Policy LP 43 Visitor Economy
- Policy LP 44 Facilitating Sustainable Travel Choices
- Policy LP 45 Parking standards and servicing

### Site Allocations

- SA 1 Hampton Square, Hampton
- SA 2 Platts Eyot, Hampton
- SA 3 Hampton Traffic Unit, 60-68 Station Road, Hampton
- SA 4 Hampton Delivery Office, Rosehill, Hampton
- SA 5 Telephone Exchange, Teddington
- SA 6 Teddington Delivery Office, Teddington
- SA 7 Strathmore Centre, Strathmore Road, Teddington
- SA 8 St Mary's University, Twickenham
- SA 9 Richmond upon Thames College, Twickenham
- SA 10 The Stoop (Harlequins Rugby Football Club), Twickenham
- SA 11 Twickenham Stadium, Twickenham
- SA 12 Mereway Day Centre, Mereway Road, Twickenham

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- SA 13 Telephone Exchange, Whitton
- SA 14 Ham Close, Ham
- SA 15 Cassel Hospital, Ham Common, Ham
- SA 16 St Michael's Convent, Ham Common, including new OOLTI designation
- SA 17 Ryde House, East Twickenham
- SA 18 Richmond Station, Richmond
- SA 19 Friars Lane Car Park, Richmond
- SA 20 Sainsbury's, Lower Richmond Road, Richmond
- SA 21 Pools on the Park and surroundings, Richmond
- SA 22 Richmond Rugby and Richmond Athletic Ground, Richmond
- SA 23 Stag Brewery, Lower Richmond Road, Mortlake
- SA 24 Mortlake and Barnes Delivery Office, Mortlake
- SA 25 Kew Biothane Plant, Mellis Avenue, Kew
- SA 26 Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen
- SA 27 Barnes Hospital, East Sheen



# Appendix 2 - Policies to be superseded **15**

Pre-Publication Local Plan

### Pre-Publication Local Plan

## 15 Appendix 2 - Policies to be superseded

### Core Strategy policies to be superseded by the Local Plan

- CP1 Sustainable Development
- CP2 Reducing Carbon Emissions
- CP3 Climate Change - Adapting to the Effects
- CP4 Biodiversity
- CP5 Sustainable Travel
- *CP6 Waste (this has already been superseded by the West London Waste Plan)*
- CP7 Maintaining and Improving the Local Environment
- CP8 Town and Local Centres
- CP9 Twickenham Town Centre
- CP10 Open Land and Parks
- CP11 River Thames Corridor
- CP12 River Crane Corridor
- CP13 Opportunities for All (Tackling Relative Disadvantage)
- CP14 Housing
- CP15 Affordable Housing
- CP16 Local Services/Infrastructure
- CP17 Health and Well-being
- CP18 Education and Training
- CP19 Local Business
- CP20 Visitors and Tourism

### Development Management policies to be superseded by the Local Plan

- Policy DM SD 1 Sustainable Construction
- Policy DM SD 2 Renewable Energy and Decentralised Energy Networks
- Policy DM SD 3 Retrofitting
- Policy DM SD 4 Adapting to Higher Temperatures and Need for Cooling

- Policy DM SD 5 Living Roofs
- Policy DM SD 6 Flood Risk
- Policy DM SD 7 Sustainable Drainage
- Policy DM SD 8 Flood Defences
- Policy DM SD 9 Protecting Water Resources and Infrastructure
- Policy DM SD 10 Water and Sewerage Provision
- Policy DM OS 1 Major Developed Site in the Green Belt
- Policy DM OS 2 Metropolitan Open Land
- Policy DM OS 3 Other Open Land of Townscape Importance
- Policy DM OS 4 Historic Parks, Gardens and Landscapes
- Policy DM OS 5 Biodiversity and new development
- Policy DM OS 6 Public Open Space
- Policy DM OS 7 Children's and Young People's Play Facilities
- Policy DM OS 8 Sport and Recreation Facilities
- Policy DM OS 9 Floodlighting
- Policy DM OS 10 Allotments and other food growing spaces
- Policy DM OS 11 Thames Policy Area
- Policy DM OS 12 Riverside Uses
- Policy DM OS 13 Moorings and Floating Structures
- Policy DM TC 1 Larger Town Centres
- Policy DM TC 2 Local and Neighbourhood Centres and Areas of Mixed Use
- Policy DM TC 3 Retail Frontages
- Policy DM TC 4 Local Shops, Services and Public Houses
- Policy DM TC 5 The Evening Economy
- Policy DM HD 1 Conservation Areas - designation, protection and enhancement
- Policy DM HD 2 Conservation of Listed Buildings and Scheduled Ancient Monuments
- Policy DM HD 3 Buildings of Townscape Merit
- Policy DM HD 4 Archaeological Sites
- Policy DM HD 5 World Heritage Site
- Policy DM HD 6 War Memorials
- Policy DM HD 7 Views and Vistas

- Policy DM HO 1 Existing Housing (including conversions, reversions and non self-contained accommodation)
  - Policy DM HO 2 Infill Development
  - Policy DM HO 3 Backland Development
  - Policy DM HO 4 Housing Mix and Standards
  - Policy DM HO 5 Housing to Meet Specific Community Needs
  - Policy DM HO 6 Delivering Affordable Housing
  - Policy DM SI 1 Encouraging New Social Infrastructure Provision
  - Policy DM SI 2 Loss of Existing Social Infrastructure Provision
  - Policy DM EM 1 Development for Offices, Industrial, Storage and Distribution uses
  - Policy DM EM 2 Retention of Employment
  - Policy DM TP 1 Matching Development to Transport Capacity
  - Policy DM TP 2 Transport and New Development
  - Policy DM TP 3 Enhancing Transport Links
  - Policy DM TP 4 Integration of different types of Transport and Interchange Facilities
  - Policy DM TP 5 Taxis and Private Hire Vehicles
  - Policy DM TP 6 Walking and the Pedestrian Environment
  - Policy DM TP 7 Cycling
  - Policy DM TP 8 Off Street Parking - Retention and New Provision
  - Policy DM TP 9 Forecourt Parking
  - Policy DM DC 1 Design Quality
  - Policy DM DC 2 Layout and Design of Mixed Use Schemes
  - Policy DM DC 3 Taller Buildings
  - Policy DM DC 4 Trees and Landscape
  - Policy DM DC 5 Neighbourliness, Sunlighting and Daylighting
  - Policy DM DC 6 Balconies and Upper Floor Terraces
  - Policy DM DC 7 Shop fronts and shop signs
  - Policy DM DC 8 Advertisements and Hoardings
  - Policy DM DC 9 Planning Application Checklist
  - B1 Westfields School: use of playground out of school hours
  - B2 Barnes Station and former goods yard: car park, public open space, possible enabling development
  - B4 Mill Hill/Rocks Lane: junction improvement & highway maintenance
  - B5 Barn Elms Sports Ground: rationalisation of sports use including provision of public indoor sports hall & upgrading sports pitches, enhancement of landscape
  - B6 Beverley Brook: pedestrian access to Richmond Park
  - S1 East Sheen Primary School, Upper Richmond Road West: use of playground out of school hours
  - S2 Sheen Mount Primary School: use of playground out of school hours
  - S3 Holy Trinity C of E Primary School, Carrington Road: use of playground out of school hours
  - S4 Budweiser Stag Brewery: conversion and part redevelopment
  - S5 Post Office Sorting Office/Signal House/Public House: reducing width of High Street, bringing forward of building line
  - S6 Mortlake Station: interchange improvements
  - S7 North Sheen Station: interchange improvements
  - P1 Meadlands School: use of playground out of school hours
  - P3 Grey Court School: improvement of school premises, increased public use of school facilities including school hall
  - P4 King George's Pavilion: housing/employment/community use.
  - H1 Land and Buildings at Hampton Water Treatment Works: Conversion of redundant Thames Water buildings for business, residential and other compatible uses together with re-use of the associated filter beds and surrounding land.
  - H2 Sunnyside Reservoir, Lower Sunbury Road: use for water-based sport, recreational uses.
  - H3 Hydes Field, Upper Sunbury Road: short stay camping and caravanning
  - H5 Hampton Station: interchange improvements
  - H6 North end of Oak Avenue, Hampton: recreation use
  - H7 Open space, north end of Oak Avenue: bridle path
- Saved Unitary Development Plan proposal sites to be superseded by the Local Plan**

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- H8 Buckingham JM/I School: increased community use
- H9 Beveree, Beaver Close: children's playground
- H10 Hampton Infants School, Ripley Road: use of playground out of school hours
- H11 Hampton Junior School, Percy Road: school extension, use of playground out of school hours
- H14 Hatherop Recreation Ground: public open space improvement
- H15 Platts Eyot, Lower Sunbury Road: mixed use development suitable uses include business or industrial (B1 or B2), leisure and residential.
- H16 Church Street/High Street: road closure, environmental improvement
- H17 Church Street: reduction in carriageway width
- H18 Station Road/Ormond Avenue/Tudor Road/Oldfield Road: junction improvement
- H19 High Street/Thames Street: junction improvement
- H20 Thames Street/Church Street: traffic signals
- H21 Hampton Court Road/Chestnut Avenue: junction realignment and improvement
- H22 Fulwell Bus Garage/BR Station: interchange improvements
- H23 Hampton Water Works: Operational water works development.
- H24 Former Council Depot, Oldfield Road: Housing
- K3 Queens C of E Primary Schools: use of playground out of school hours
- K4 Kew Gardens Station: interchange improvements
- R1 George Street: improved conditions for pedestrian, feasibility of pedestrianisation
- R2 The Quadrant: service road extension and other uses
- R4 Friars Lane car park: Housing
- R6 Richmond Station and air track rights: transport inter-change, railtrack concourse, comprehensive retail/ business use/community/entertainment/residential/ parking
- R7 Land at rear of 10 Kings Road: housing
- R8 Pools on the Park: intensification of sports use
- R9 New Vineyard School: use of playground out of schools hours
- R11 Terrace Yard, Petersham Road: Housing
- D1 Normansfield: institution use/hotel/training centre, leisure, open space, nature conservation, housing
- D2 Hampton Wick Station: station redevelopment, business use
- D3 Teddington Library: library extension
- D4 Teddington Station: station car park and environmental improvements
- D5 Queens Road Clinic: rebuild clinic to modern day standards to include GP surgery.
- D6 The Causeway, Teddington: pedestrian enhancement
- D7 Former playingfield, School House Lane: children's playground
- D9 Sacred Heart RC Primary School: use of playground out of school hours
- D10 St John the Baptist C of E School: possible extension of school, use of playground out of school hours
- D11 Stanley Primary Schools: use of playground out of school hours
- D12 Teddington School/Broom Road Recreation Ground: Rebuild school, increased public use of school facilities including sports hall and all weather pitches and joint public/school use of recreation ground.
- D13 From Kingston Bridge, via Bushy Park, Hampton Hill, Fulwell Golf Course and Crane Park towards Hounslow Heath: London Loop Outer Orbital Walking Route.
- T2 Stable block, Orleans House: art gallery extension, local studies museum
- T4 Oak Lane Cemetery: public open space
- T7 Waldegrave School: extension and improvement to school premises, increased public use of school facilities
- T8 Archdeacon Cambridge C of E Primary Schools: use of playground out of school hours
- T9 Trafalgar Primary Schools, Elmsleigh Road: use of playground out of school hours
- T10 St James' RC Primary School: use of playing fields out of school hours

- T12 Orleans Park School: increased public use of school facilities including sports hall and playing fields
- T13 Meadway: use of playground out of school hours
- T14 Craneford Way Depot: depot facilities/ residential use
- T16 Fountain Public House: hotel
- T18 Marble Hill Park: landscaping improvements
- T19 Chertsey Road/London Road: junction improvement
- T20 Whitton Road/Rugby Road: roundabout improvement
- T21 St Margarets Road/Richmond Road/Rosslyn Road: junction improvement
- T22 Chertsey Road/Hospital Bridge Road: junction improvement
- T24 Brunel University College, Twickenham: redevelopment for a mixed use scheme, including housing, some community/ education/ employment use, retention of listed buildings and some open areas, improved links through site.
- T25 St Margarets Station: interchange improvements
- T26 Strawberry Hill Station: interchange improvements
- T27 St Mary's Junior C of E School Rear of Orleans Park School: use of playground out of school hours.
- T28 Harlequins Rugby Ground: Continued use as sports ground with associated facilities, enabling development, new access road.
- T29 Redevelopment to provide college & enabling residential development. Retention & upgrading of Craneford Way East Playing Field.
- W2 Chase Bridge Primary School: possible extension of schools, use of playground out of school hours
- W3 Nelson Primary School: school rebuilding, affordable housing, use of playground out of school hours
- W4 St Edmunds RC Primary School: use of playground out of school hours
- W5 Bishop Perrin's C of E Primary School: use of playground out of school hours
- W6 Hospital Bridge Road north of Montrose Avenue: highway widening
- W7 Hanworth Road: railway bridge reconstruction with footways
- W8 Powder Mill Lane: heavy goods vehicles restriction
- W9 Whitton School: increased public use of school facilities and playing fields
- W10 High Street: environmental improvements
- W11 A316 near Hospital Bridge Road: footbridge extensions
- W12 Hanworth Road/Powdermill Lane: junction improvement
- W14 Whitton Station: interchange improvements
- W15 Heathfield Schools & Heathfield Rec (part): Rebuild existing schools and add new secondary school



# Appendix 3 - Parking Standards **16**

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## 16 Appendix 3 - Parking Standards

**16.0.1** The Council is in the process of developing research to inform the review of the local parking standards. Consultants have been commissioned to analyse the following options:

- the adopted London Plan standards, including the flexible approach in areas of PTALs 0-1, with limited parts in PTAL 2;
- the Council's current parking standards, as set out in Appendix 4 of the Development Management Plan; and
- new borough-wide parking standards, as informed by the research and analysis of options.

**16.0.2** Therefore, the locally specific parking standards for this borough will be provided as part of the 'Publication' Plan of the Local Plan.

# Appendix 4 - List of Key and Secondary Shopping Frontages **17**

Pre-Publication Local Plan

## 17 Appendix 4 - List of Key and Secondary Shopping Frontages

Key Frontage	Secondary Frontage
<b>ASHBURNHAM ROAD</b>	
<b>Ashburnham Road</b> Nos. 171-185 (odd)	
<b>BARNES</b>	
<b>Barnes High Street</b> Nos. 3- 25 (consecutive) Nos. 51-64 (consecutive)	<b>Barnes High Street</b> Nos. 1, 1a, 1b, 1c, 2, (consecutive) Nos. 65-69 (consecutive) Nos. 33-36a (consecutive)
<b>Church Road</b> Nos. 125-145 (odd) Nos. 54-102 (even) Nos. 49-85 (odd)	<b>Church Road</b> Nos. 145a-175 (odd)
	<b>Rocks Lane</b> Nos. 1-9
<b>CASTELNAU</b>	
<b>Castelnau</b> Nos. 174-202 (even) Nos. 185-201 (odd)	
<b>EAST SHEEN</b>	
<b>Sheen Lane</b> Nos. 137-141 (odd) Parkway House	<b>Sheen Lane</b> Nos. 105-135 (odd) Nos. 28-40 (even) Nos. 31-63 (odd) Nos. 65A-77 (odd)
<b>Upper Richmond Road West</b> Nos. 220-254 (even) Nos. 256-296 (even) Nos. 341-361 (odd) Nos. 363-445 (odd)	<b>Upper Richmond Road West</b> Nos. 184-218 (even) Nos. 215-339 (odd) Nos. 298-318 (even) Nos. 447-501 (odd)

Key Frontage	Secondary Frontage
	Nos. 1- 10 Grand Parade (consecutive)
<b>EAST TWICKENHAM</b>	
<b>Richmond Road</b> Nos. 344-380 (even)	<b>Richmond Road</b> Nos. 359-387 (odd) Nos. 417-447 (odd) not including 439 Nos. 332-342 (even) Nos. 382-428 (even)
<b>FRIARS STILE ROAD</b>	
<b>Friars Stile Road</b> Nos. 19-23A (odd) Nos. 36-56 (even)	
<b>FULWELL</b>	
<b>Hampton Road</b> Nos. 206-224 (even)	
<b>HAM STREET / BACK LANE</b>	
<b>Ashburnham Road</b> Nos. 2-16 (even)	<b>Back Lane</b> Nos. 4-14 (even)
<b>Ham Street</b> Nos. 63-71 (odd)	
<b>HAM COMMON</b>	
<b>Upper Ham Road</b> Parkleys Parade 1-6 (consecutive) Nos. 21-31 (odd)	<b>Richmond Road</b> Nos. 406-414a (even)
<b>Richmond Road</b> Nos. 299-323 (odd) Nos. 414-432 (even)	

## 17 Appendix 4 - List of Key and Secondary Shopping Frontages

### Pre-Publication Local Plan

Key Frontage	Secondary Frontage
<b>HAMPTON HILL</b>	
<b>High Street</b> Nos. 50-78 (even) Nos. 169-183 (odd)	<b>High Street</b> Nos. 73-83;101-111;131-143 Nos. 185-201; 203-217(odd) Nos. 10-48; 118a-118e Nos. 120-122 (even)
<b>HAMPTON NURSERY LANDS</b>	
<b>Tangley Park Road</b> Nos. 26-30 (consecutive)	
<b>HAMPTON VILLAGE</b>	
<b>Milton Road</b> Nos. 70-76 (even)	<b>Milton Road</b> Nos. 78-82 (even)
<b>Station Road</b> Nos. 70-82 (even) Nos. 92-100 (even)	<b>Ashley Road</b> Nos. 27-37 (odd)
<b>Station Approach</b> Nos. 1-3 (consecutive)	<b>Station Approach</b> Nos. 4-9
<b>Wensleydale Road</b> Nos. 1-13 (odd)	<b>Oldfield Road</b> Nos. 55-63 (odd)
<b>Priory Road</b> Nos. 33-41 (odd)	<b>Percy Road</b> No. 31
<b>HAMPTON WICK</b>	
<b>High Street</b> Nos.32-48 (even) No. 56-58 (even)	

Key Frontage	Secondary Frontage
<b>HEATHSIDE</b>	
<b>Powder Mill Lane</b> Nos.222-226 (even) Nos.221-247 (odd)	<b>Hanworth Road</b> Nos.646-670 (even)
<b>HOSPITAL BRIDGE ROAD</b>	
<b>Staines Road</b> Nos.326-336 (even)	
<b>KEW GARDENS STATION</b>	
<b>Station Approach</b> Nos. 1-9 (consecutive)	<b>North Road</b> Nos. 102-109 (consecutive)
<b>Station Parade</b> Nos. 1-17 (odd) Nos. 2-18 (even)	<b>Royal Parade</b> Nos. 1-9 (consecutive)
<b>KEW GREEN</b>	
<b>Mortlake Terrace</b> Nos. 1-9 (consecutive)	
<b>KEW ROAD</b>	
	<b>Kew Road</b> Nos. 101-145 (odd) Nos. 84-112 (even)
<b>KINGSTON ROAD</b>	
<b>Kingston Road</b> Nos. 149-161 (odd) Nos. 190-208 (even)	<b>Kingston Road</b> Nos. 210-216 (even)  <b>Bushy Park Road</b> Nos. 1-5 The Pavement (consecutive)
<b>LOWER MORTLAKE ROAD</b>	



Key Frontage	Secondary Frontage
<b>Lower Mortlake Road</b> Nos. 203-223 (odd)	<b>Lower Mortlake Road</b> Nos. 225-231 (odd)
<b>NELSON ROAD</b>	
<b>Nelson Road</b> Nos.300-310 (even) Nos.314-322 (even)	
<b>RICHMOND MAIN CENTRE</b>	
<b>Brewers Lane</b> Nos. 2-18 (even) Nos. 3-13 (odd)	<b>Duke Street</b> Nos. 1-6 (consecutive) No. 8
<b>Bridge Street</b> Nos. 1-2 (consecutive)	<b>Eton Street</b> Nos. 1-3 (odd)
<b>Dome Buildings</b> Nos. 1-6 (consecutive)	Nos. 2-18 (even)
<b>George Street</b> Nos. 1-84 (consecutive)	<b>Hill Rise</b> Nos. 1-17 (odd)
<b>Lower George Street</b> Nos. 1-8 (consecutive)	<b>Kew Road</b> Nos.1-61 (odd)
<b>Church Court</b> Nos. 1-6 (even)	<b>Petersham Road</b> Nos. 1-13 (odd)
<b>Golden Court Parade</b> Nos. 1-9 (odd) premises adj. to 27-28 The Green & fronting Golden Court	<b>The Quadrant</b> Nos. 19-32 (consecutive)
<b>The Green</b> Nos. 13, 26-29 (consecutive)	<b>Richmond Hill</b> Nos. 6-26 (even)
<b>Hill Rise</b> Nos. 2-32 (even) Nos. 40-86 (even)	<b>Red Lion Street</b> Nos. 10-32 (even)
	<b>Sheen Road</b> Nos. 15-21 (odd)
	<b>Westminster House</b>

Key Frontage	Secondary Frontage
<b>Hill Street</b> Nos. 1-23 (odd) Nos. 2-74 (even)	Nos. 1-7 (consecutive)
<b>King Street</b> Nos. 4-16 (consecutive) Nos. 19-19a, 20-26 (consecutive)	
<b>Lichfield Court Parade, Sheen Road</b> Nos. 1-16 (consecutive)	
<b>The Passage</b>	
<b>Paved Court</b> Nos. 1-17 (consecutive)	
<b>The Quadrant</b> Nos. 1-18 (consecutive) Nos. 33-50 (consecutive)	
<b>Red Lion Street</b> Nos. 1-3 (odd) Nos. 2-8 (even)	
<b>Sheen Road</b> Nos. 1-13 (odd) Nos. 2-4 (even)	
<b>The Square</b> Nos. 1-4 (consecutive) Former public convenience	
<b>ST MARGARETS</b>	
<b>Crown Road</b> Nos. 2-24 (even)	<b>Amyand Park Road</b> Nos. 208, 210
<b>St. Margarets Road</b> Nos. 125-155 (odd) Nos. 109-119 (odd)	<b>Crown Road</b> Nos. 26-32 (even) Nos. 35-43 (odd) Nos. 34-48 (even)

## 17 Appendix 4 - List of Key and Secondary Shopping Frontages

### Pre-Publication Local Plan

Key Frontage	Secondary Frontage
	<b>St Margarets Road</b> No. 123 Station Kiosks Nos. 116-126A (even) Nos. 157-165 (odd)
<b>ST MARGARETS ROAD</b> (parade to the north of A316)	
	<b>St Margarets Road</b> Nos. 379-391 (odd)
<b>SANDYCOMBE ROAD</b>	
<b>Sandycombe Road</b> Nos. 293-303 (odd)	<b>Sandycombe Road</b> Nos. 296-308 (even)
<b>SHEEN ROAD</b>	
<b>Sheen Road</b> Nos. 106-124 (even)	<b>Sheen Road</b> Nos. 80-94
<b>STANLEY ROAD</b>	
<b>Stanley Road</b> Nos. 176-184 (even) Nos. 91-121 (odd)	<b>Stanley Road</b> Nos. 186-192 (even) Nos. 139-147 (odd)
<b>STRAWBERRY HILL</b>	
<b>Tower Road</b> Nos.50-56 (even) Nos.70-74 (even) Nos.39-45 (odd)	
<b>Wellesley Parade</b> Nos.1-6 (consecutive)	
<b>TEDDINGTON</b>	

Key Frontage	Secondary Frontage
<b>Broad Street</b> Nos. 17-67 (odd) Nos. 8-72 (even)	<b>Broad Street</b> Nos. 1-15 (odd) [including Oval Court] Nos. 2-6 (even) Nos. 74-86 (even)
<b>High Street</b> Nos. 6-42 (even) Nos. 70-98 (even) Nos. 19-67 (odd) Nos. 73-121 (odd)	<b>Church Road</b> Nos. 1-13 (odd) Nos. 6-16 (even)
<b>Station Road</b> No. 1	<b>High Street</b> Nos. 100-160 (even)
	<b>The Causeway</b> Nos. 2-28 (even) Nos. 1-13 (odd)
<b>TWICKENHAM GREEN</b>	
<b>Staines Road</b> Nos. 8-38a (even)	
<b>TWICKENHAM</b>	
<b>Church Street</b> Nos. 9-28 (consecutive) Nos. 31-58 (consecutive)	<b>Heath Road</b> Nos. 46-164 (even) Nos. 1-85 (odd) Nos. 149-157 (odd)
<b>Heath Road</b> Nos. 2-44 (even)	<b>King Street</b> Nos. 41-59 (odd)
<b>King Street</b> Nos. 1-39 (odd) Nos. 2-62 (even)	<b>London Road</b> Nos. 11-65 (odd)
<b>London Road</b> Nos. 1-9 (odd) Nos. 2-50 (even)	<b>York Street</b> Nos. 4-18 (even)
<b>York Street</b> Nos. 1-19 (odd)	

Key Frontage	Secondary Frontage
No. 2	
<b>WALDEGRAVE ROAD</b>	
<b>Waldegrave Road</b> Nos. 150-158 (even) Nos. 197-207 (odd)	<b>Waldegrave Road</b> No. 189-195 (odd)
<b>WHITE HART LANE</b>	
<b>White Hart Lane</b> Nos. 36-78 (even) Nos. 147-153 (odd)	<b>The Broadway</b> Nos. 1-10 (consecutive)  <b>White Hart Lane</b> Nos. 1-7 (odd)  <b>Upper Richmond Road West</b> Nos. 42-48 (even)
<b>WHITTON</b>	
<b>High Street</b> Nos. 24-58 (even) Nos. 60-106 (even) Nos. 37-103 (odd)	<b>High Street</b> Nos. 1-35 (including 35a) (odd) Nos. 105-113 (odd) Nos. 115-123 (odd) Nos. 16-22 (even) Nos. 108-114 (even) Nos. 120-136 (even)  <b>Bridge Way</b> Bridge Way House  <b>Nelson Road</b> Nos. 109-121 (odd)
<b>WHITTON ROAD</b>	
<b>Whitton Road</b> Nos. 97-105 (odd)	

# Appendix 5 - Marketing Requirements 18

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## 18 Appendix 5 - Marketing Requirements

**18.0.1** A number of policies in this Local Plan require marketing evidence to be submitted for applications involving the loss of certain uses in order to provide justification that those sites are no longer required for their existing uses, including:

- Policy LP 26 in 7.2 'Retail Frontages'
- Policy LP 27 in 7.3 'Local Shops, Services and Public Houses'
- Policy LP 28 in 8.1 'Social and Community Infrastructure'
- Policy LP 41 in 10.2 'Offices'
- Policy LP 42 in 10.3 'Industrial Land and Business Parks'

**18.0.2** This appendix sets out the details that should be provided to enable officers to assess the acceptability or otherwise of the marketing undertaken.

**18.0.3** Marketing should always involve a robust and active marketing campaign and should:

- Be ongoing for a minimum period of two continuous years.
- Be through a commercial agent.
- The property should be marketed on property databases, search engines and other relevant websites which focus on the sale or letting of commercial premises, which are free to view and easily accessible by prospective purchasers / tenants.
- Prices should be commensurate with the existing quality and location of the premises.

**18.0.4** A marketing report must be submitted and include the following details:

- Identify the last occupier including name, address, nature of business and floorspace. If the land / buildings are vacant, state the date they were last occupied.

- The date when marketing began and ceased (if relevant) for each agent, if more than one used.
- It should be clearly stated which land uses the property/site is being marketed for, identifying the dates of marketing for each land use.
- Identify the agents used for marketing and a copy of the agents particulars, including any amended particulars to be supplied.
- Details of the price the site has been marketed at and whether the price was reduced, stating the date that it was reduced if this was the case. Marketing should always be at a price that genuinely reflects the market value of the property in its current use and current quality.
- Details of the marketing methods used must be provided. The report should include:

- The marketing particulars.
- Which websites or press the property/site was advertised on, identifying dates when freely available to be viewed, and in the case of websites, the number of 'hits'.
- Details of direct marketing used including a copy of the marketing brochure, details of who the marketing particulars were circulated to including the size of the database, whether the database used is mainly aimed at potential occupiers based locally or nationally. Distribution of marketing material should be on a quarterly basis.
- Whether a marketing board has been used and the dates it was displayed. Use of a marketing board is advised wherever possible.

- Details of the marketing outcomes should include any (a) expressions of interest; and (b) offers made. In both cases the interested parties should be identified and where the premises were rejected the reasons for doing so should be stated.

**18.0.5** All marketing undertaken must meet the requirements set out in paragraph 18.0.3 and a marketing report must be submitted which includes the details set out in paragraph 18.0.4. More specific marketing requirements may be requested for different types of uses, as set out below.



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#### Retail (A1 use class)

**18.0.6** Where a proposal involves a change of use away from retail that is not supported by policy within designated and non-designated shopping frontages, marketing must also include the following:

- A comparison of rents achieved for other comparable A1 uses relevant to the application site, taking into account the size of the unit and other matters such as location and servicing.
- Marketing evidence will be needed where there is a total loss of an A1 use or where the loss (including ancillary floorspace) is very substantial.

#### Pubs (A4 use class)

**18.0.7** The Council will resist the loss of public houses, which are considered to be a valuable community facility. Where the loss of a public house, or substantial reduction in A4 floorspace is proposed marketing must also include the following:

- Details should be provided about the operation of the public house (including at the time of closure if vacant) such as the turnover of the public house, the percentage split between wet sales and food and whether the premises is used as a music venue etc;
- It is expected that public houses will be marketed via an estate agent specialising in the leisure industry, where this is not the case the applicant should explain why
- Applicants should also have regard to the Campaign for Real Ale's (CAMRA) Public House Viability Test.
- Consideration should be given to a full range of other social and community infrastructure uses in line with policy LP 28 and the requirements set out in paragraph 18.0.13 below.

**18.0.8** Please note that the Council will take into account the considerations set out in the supporting text to policy LP 27 including whether there is another public house within 400 metres. Applicants should address this when submitting a planning application.

#### Offices (B1 use class)

**18.0.9** Where a proposal involves a change of use or redevelopment resulting in a loss of office space (outside of the designated Key Office Areas), marketing must clearly demonstrate that there is no longer demand for an office based use in this location and that there is not likely to be in the foreseeable future. Marketing must also include the following:

- Evidence that the site has been marketed for the existing office use and other types of office-based uses such as flexible, start-up or co-working space.
- Offices should be marketed at a price commensurate with their existing quality or condition based on the local office market, by reference to comparables in the locality.
- The lease term should not be unduly restrictive and should include the potential for a short-term lease in appropriate cases. Details of the lease terms offered should be included in the marketing report
- Alternatively, the potential of upgrading the building or adapting the building to meet modern office requirements should be explored. This may include a viability assessment addressing the feasibility of refurbishing or modernising the existing office space.

**18.0.10** If officers are satisfied that a full and proper marketing exercise has been completed, redevelopment or change of use away from office space should follow the sequential test outlined in policy LP 41.

**18.0.11** Please note that marketing will not be accepted as justification for loss of office floorspace in designated Key Office Areas. There will be no net loss of office floorspace in these areas.

#### Industrial land and business parks (B1c, B2, B8 and Sui Generis use classes)

**18.0.12** Where a proposal involves a change of use or redevelopment resulting in a loss of industrial space marketing must clearly demonstrate that there is no longer demand for an industrial based use in this location and that there is not likely to be in the foreseeable future. Marketing must also include the following:

- Attempts to market poorer quality premises should be on the basis of their present condition, and not on their potential for redevelopment in other employment uses, or proposing housing as the only viable option.
- In line with the sequential test outlined in policy LP 42, if marketing for an alternative industrial use is not forthcoming then consideration should be given to alternative employment generating uses including, in the first instance, B use classes such as offices and if these are not practicable then social infrastructure and community uses.

#### **Social and Community Infrastructure (D Use Classes and Sui Generis uses)**

**18.0.13** For applications involving any loss of a social and community infrastructure, it is very important that the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure is fully considered in line with policy LP 28. Marketing must also include the following:

- Evidence that the facility is no longer needed. Evidence of meaningful engagement with service providers or a public disposal process would be required to demonstrate this.
- Evidence that the loss of the facility would not have a detrimental impact on social and community service provision. For example, a marketing report could provide details of alternative facilities in close proximity and provide evidence that existing users have all been successfully relocated and that this has not resulted in any shortfall in provision.
- Consideration should be given to the potential for adapting the site / premises to meet community needs either now or in the future.

- Evidence should be provided to show that premises have been offered at a reasonable charge to appropriate user groups, e.g. at a discounted rate to community groups or voluntary organisations.
- Where the site is an existing health facility, consideration should first be given to re-using the site for other health facilities before other social infrastructure uses. Applicants should contact NHS Property Services and Richmond CCG to discuss their needs for health floorspace in the area.

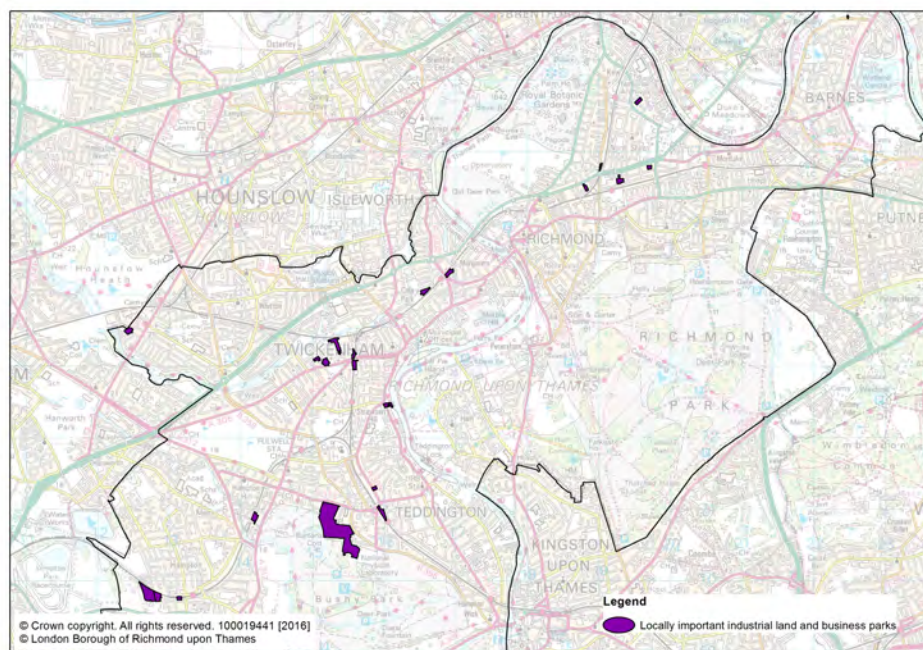
# Appendix 6 - Locally important industrial land and business parks **19**

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## 19 Appendix 6 - Locally important industrial land and business parks

**19.0.1** The following locally important industrial land and business parks, as set out in policy 42 in '10.3 Industrial Land and Business Parks', are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities.

### Overview of locally important industrial land and business parks



### Kempton Gate Business Park, Oldfield Road, Hampton





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**Kingsway Business Park, Oldfield Road, Hampton**



**St Clare Business Park, Holly Road, Hampton**





### 74 Oldfield Road, Hampton

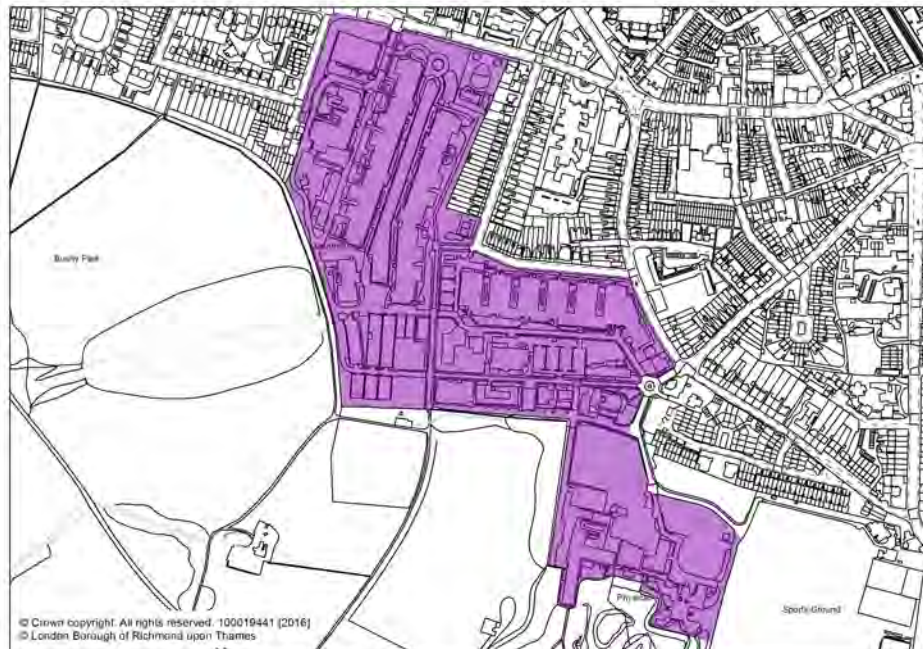


### 50-56 Waldegrave Road, Teddington



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**National Physical Laboratory and Laboratory of the Government Chemist, Hampton Road, Teddington**



**Teddington Business Park, Station Road, Teddington**







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**St George's Industrial Estate, The Green, Twickenham**

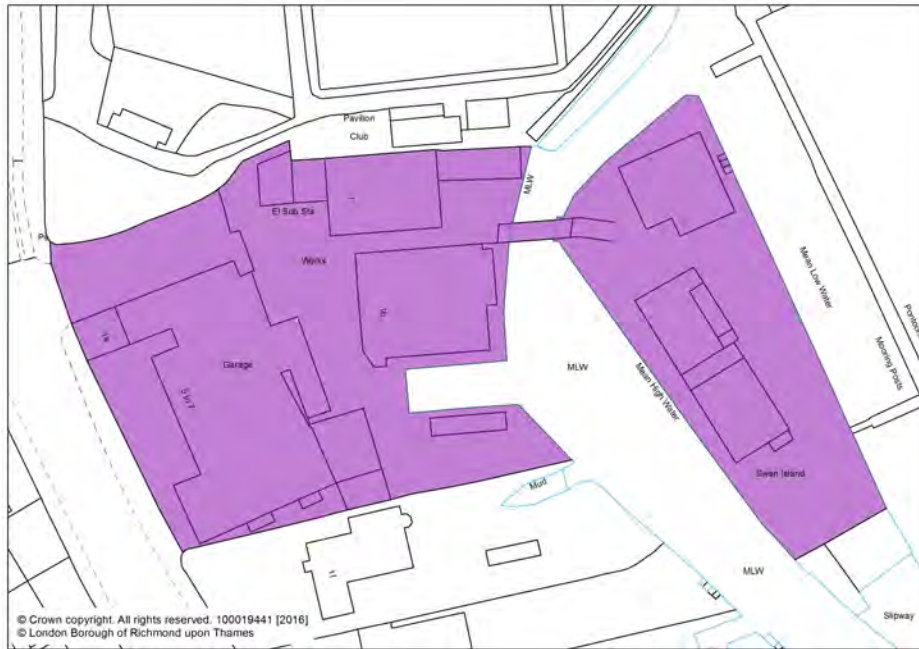


**Mereway Road Industrial Estate, Twickenham**





### Swan Island Industrial Estate, Strawberry Vale, Twickenham



### Electroline House and surrounds, Twickenham





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**St Margarets Business Centre, Winchester Road, St Margarets**



**Twickenham Film Studios and Arlington Works, St Margarets**



### Market Road, Richmond



### Sandycombe Centre, Sandycombe Road, Kew





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**Marlborough Trading Estate, Mortlake Road, Kew**



**Mill Farm Business Park, Whitton**



**Big Yellow Self Storage, Lower Mortlake Road, Richmond**



**Big Yellow Self Storage, Lower Richmond Road, Richmond**



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**Currie Easy Self Storage, Market Road, Richmond**





# Appendix 7 - Glossary 20

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## 20 Appendix 7 - Glossary

### **Affordable Housing**

Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. The NPPF sets out further the definition of affordable housing.

### **Archaeological Resources**

This includes artefacts, archaeological features and deposits.

### **Article 4 Direction**

A direction which withdraws automatic planning permission granted under Article 4(1) of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

### **Biodiversity**

This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.

### **Blue Ribbon Network**

A spatial policy element of the London Plan covering London's waterways and water spaces, including land alongside them. Aside from the River Thames, the other major components of the network within the borough are the River Crane, Beverley Brook, Duke of Northumberland River and Longford River.

### **Building of Townscape Merit (BTM)**

Buildings of Townscape Merit are buildings, groups of buildings or structures of historic or architectural interest, which are locally listed due to their considerable local importance. Buildings of Townscape Merits are non-designated heritage assets.

### **BREEAM**

BREEAM (Building Research Establishment Environmental Assessment Method) sets standards for best practice in sustainable building design, construction and operation and has become one of the most comprehensive and widely recognised measures of a building's environmental performance. A BREEAM assessment uses recognised measures of performance, which are set against established benchmarks, to evaluate a building's specification, design, construction and use. The measures used represent a broad range of categories and criteria from energy to ecology. They include aspects related to energy and water use, the internal environment (health and wellbeing), pollution, transport, materials, waste, ecology and management processes.

### **Brownfield Site (see Previously Developed Land)**

### **Business Improvement Districts (BIDs)**

A Business Improvement District (BID) is a defined area within which businesses are required to pay an additional tax (or levy) in order to fund projects within the BID's boundaries.

### **Car Club**

These are schemes such as city car clubs and car pools, which facilitate vehicle sharing.

### **Capital Asset Value for Amenity Trees (CAVAT)**

CAVAT provides a methodology for calculating the monetary value and/or compensation where a tree is felled or damaged. It works by calculating a unit value for each square centimetre of tree stem, by extrapolation from the average cost of a range of newly planted trees. This basic value is

adjusted to reflect the degree of benefit that the tree provides to the local population. The adjustment is designed to allow the final value to reflect realistically the contribution of the tree to public welfare through tangible and intangible benefits. For further information see the [London Tree Officers Association](http://www.ltoa.org.uk/resources/cavat) website at [www.ltoa.org.uk/resources/cavat](http://www.ltoa.org.uk/resources/cavat)

### **Centre Hierarchy**

The hierarchy of centres in the borough categorises centres and parades into 4 types – main centres, local centres, neighbourhood centres and parades of local importance. They range significantly in size and function. Paragraph 23 of the NPPF requires local planning authorities to define such a hierarchy.

### **Combined Heat and Power (also see Decentralised Energy)**

The combined production of electricity and usable heat is known as Combined Heat and Power (CHP). Steam or hot water, which would otherwise be rejected when electricity alone is produced, is used for space or process heating.

### **Community Infrastructure Levy (CIL)**

The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008, as a tool for local authorities to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010. It allows local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

### **Community Plan**

The Community Plan 2016 - 2020 is the Richmond Partnership's overall vision for the borough and describes how the Council and its partners will work together with the local community to inform everything they do and put people first. Further information can be found on the [Council's website](http://www.richmond.gov.uk/community_plan) at [www.richmond.gov.uk/community\\_plan](http://www.richmond.gov.uk/community_plan)

### **Comparison Retail / Shopping**

These refer to shopping for items such as clothes, electrical, furniture and leisure goods, which are not bought on a regular basis.

### **Conservation (Heritage)**

The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

### **Conservation Area**

An area declared by a local planning authority in accordance with the Town and Country Planning Act 1990 (as amended), as being of special architectural, historical or landscape interest, the character or appearance of which it is desirable to preserve or enhance.

### **Construction and Demolition Waste**

This is waste arising from the construction, repair, maintenance and demolition of buildings and structures, including roads. It consists mostly of brick, concrete, hardcore, subsoil and topsoil, but it can contain quantities of timber, metal, plastics and occasionally special (hazardous) waste materials.

### **Decentralised Energy (also see Combined Heat and Power)**

Decentralised energy generation can be described as the generation of energy in the form of heat and electrical power at or near the point of use, delivered to users via distribution pipes. This is in contrast to the traditional (and more inefficient) centralised concept, where energy is transported, in some cases, many hundreds of miles from a centralised power station to the point of energy use. Schemes can vary in size from a few dwellings to wider networks.

### **Designated Heritage Asset**

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A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

### Designated Shopping Frontage

Key shopping frontages are designated where retail uses already predominate and where retail use is to be retained. They are generally located in the core part of a centre and can be designated in parades of local importance.

Secondary shopping frontages are usually adjacent to key shopping frontages in less core positions, but are still important to supporting the retail function of the centre or parade. There is scope to increase other valued and complementary non-retail uses such as cafés, financial and professional services and community uses.

### Developer Contributions (see Planning Obligations or Community Infrastructure Levy)

### Development

This refers to development in its widest sense, including buildings, and in streets, spaces and places. It also refers to both redevelopment, including refurbishment, as well as new development and changes of use. The full definition is set out in Section 55 of the Town and Country Planning Act 1990.

### Development Brief

A brief that sets out the vision and parameters for a development site. Apart from its aspirational qualities, a brief includes site constraints and opportunities, infrastructure requirements such as energy and transport, access and planning policies. It also sets out the proposed uses and key design principles and requirements.

### Employment Land - See 'Offices' and 'Industrial Land and Business Parks'

### Energy Efficiency

This is about making the best or most efficient use of energy in order to achieve a given output of goods or services, and of comfort and convenience. This does not necessitate the use of less energy, in which respect it differs from the concept of energy conservation.

### Energy Hierarchy

The Mayor of London's approach to reducing carbon dioxide emissions in the built environment. The first step is to reduce energy demand (be lean), the second step is to supply energy efficiently (be clean) and the third step is use renewable energy (be green).

### Environmental Impact Assessment (EIA)

A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment. The process of Environmental Impact Assessment is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended).

### Evaporation

The physical process by which a liquid such as water is transformed to the gaseous state/vapour.

### Evapotranspiration

The sum of evaporation and transpiration, which means the discharge of water from the earth's surface to the atmosphere by evaporation from surface water and soil surfaces and by transpiration from plants (plants emitting water vapour from their leaves).

### Examination

Undertaken on the 'soundness' of the Submission Local Plan, namely that it is positively prepared, justified, effective and consistent with national policy. The examination is held by an independent inspector appointed by the Secretary of State.

### **Extra Care**

Extra Care is housing with care primarily for older people where occupants have specific tenure rights to occupy self-contained dwellings and where they have agreements that cover the provision of care, support, domestic, social, community or other services. This helps people to live independently, avoiding the need to move into a residential care setting. Schemes vary in scale and nature so an assessment will be made on a scheme by scheme basis if a proposal is considered as 'extra care', depending on the nature of the housing and its design features, the support services available including how care is bought and provided, and any eligibility criteria for tenants or owners.

### **Family housing**

Family housing is generally defined as having three or more bedrooms, however if of a suitable size (meeting the Nationally Described Space Standard and the external amenity standards) a two bedroom property can be designed for 3 or 4 persons and would be considered as family housing.

### **Fluvial water**

Water in the River Thames and other rivers.

### **Green Belt**

Green Belt is a national policy designation and there is a general presumption against inappropriate development in the Green Belt. In line with the NPPF, the Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;

- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

### **Green Infrastructure**

The multi-functional, interdependent network of open and green spaces and green features, including the Blue Ribbon Network, which is capable of delivering a wide range of environmental and quality of life benefits for local communities (people and wildlife), including flood management; urban cooling; improving physical and mental health; green transport links (walking and cycling routes); ecological connectivity; and food growing. Green and open spaces of all sizes can be part of green infrastructure provided they contribute to the functioning of the network as a whole.

### **Green roofs/walls**

Planting on roofs or walls to provide climate change, amenity, food growing and recreational benefits.

### **Habitable Rooms**

Includes all separate living rooms and bedrooms, plus kitchens with a floor area of 13sqm or more.

### **Health Inequalities**

Health inequalities are defined by the UK Government as 'inequalities in respect of life expectancy or general state of health which are wholly or partly a result of differences in respect of general health determinants.'

### **Health Impact Assessment (HIA)**



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HIAs are a method of estimating the potential health effects of the implementation of a plan or programme where there are likely to be significant impacts.

### Historic Environment

All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

### Industrial land and business parks

Industrial land and business parks are identified in this Plan (see Policy LP 42) and refer to land used for general industry, light industry, warehouses, open storage, self storage, distribution and logistics and other similar types of employment, as well as any other uses which fall within the B1(c), B2, B8 Use Classes or are Sui Generis (such as vehicle repair garages, scrap yards, petrol filling stations).

### Infrastructure Delivery Plan (IDP)

The IDP sets out the borough's infrastructure requirements over the lifetime of the Local Plan. It covers a range of social and community infrastructure, emergency services, green infrastructure, utilities and physical infrastructure, transport infrastructure as well as heritage assets.

### Infrastructure Delivery Schedule (IDS)

The IDS sets out the where, what, why, who and when key infrastructure that is required in the borough will be delivered.

### International, national and locally designated sites of importance for biodiversity

All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

### Listed Building

A building of special architectural or historic interest included on a statutory list. Permission is required for their demolition or alteration. Listed Buildings are 'Designated Heritage Assets'.

### Local Centre

Centres categorised in the second tier of the borough's centre hierarchy: Barnes (High Street & Church Road), East Twickenham, Hampton Hill, Hampton Village, Ham Common (Parade), Kew Gardens and St Margarets. These centres have a range of shops and services and provide cultural and community facilities and places to meet, work and live. Most are defined on the Proposals Map by an Area of Mixed Use boundary (AMU).

### Local Development Framework - see Local Plan and Local Development Document

### Local Implementation Plan (LIP) for Transport

Statutory transport plans produced by London boroughs bringing together transport proposals to implement the Mayor's Transport Strategy at the local level.

### London Development Database

This provides current and historic information about development progress across all London boroughs. It is operated by the Greater London Authority.

### London Plan

The London Plan is the spatial development strategy for the Greater London area and the Mayor of London is responsible for producing this planning strategy. The London Plan deals with matters of strategic importance to the area and forms part of the Development Plan for the borough. The plan was first published by the Greater London Authority in 2004 and has been amended in 2008, 2011, 2013, 2015 and most recently the 2015-16 Minor Alterations.

**Main centre**

There are five main centres in the borough: the principal centre of Richmond, and Twickenham, East Sheen, Teddington and Whitton. These centres are the largest in the borough and they have an important role to play, providing shops, services, employment opportunities, housing and being a focus for community and cultural life. They are defined on the Proposals Map by a Main Centre Boundary (MCB).

**Metropolitan Open Land (MOL)**

Strategic open land within the urban area that contributes to the structure of London. MOL is predominantly open land or water which is of significance to London as a whole, or to a part of London.

**Mixed Use Development**

Development for a variety of activities on single sites or across wider areas such as within centres.

**National Planning Policy Framework (NPPF)**

The NPPF, published in March 2012, sets out the Government's planning policies for England and how these are expected to be applied, alongside other national planning policies. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

**Nature Conservation**

Protection, management and promotion for the benefit of wild species and habitats, as well as the human communities that use and enjoy them. This also covers the creation and re-creation of wildlife habitats and the techniques that protect genetic diversity and can be used to include geological conservation.

**Neighbourhood Centre**

Centres categorised in the third tier of the borough's centre hierarchy: Castelnau, Friars Stile Road, Hampton Wick, Heathside (Powder Mill Lane), Sheen Road, Kingston Road (Teddington), Stanley Road (Teddington), White Hart Lane (Barnes/Mortlake). Not as large as 'local centres', neighbourhood centres also provide a focus for local communities and opportunities to meet, shop, work and spend leisure time. Most are defined on the Proposals Map by an Area of Mixed Use boundary (AMU).

**Neighbourhood (Development) Plan - also see Village Planning**

Neighbourhood Plans can establish a vision for an area, include general planning policies for the development and use of land in a designated neighbourhood area and they can allocate sites for development. These are plans on a much smaller scale than the Local Plan and should therefore be about local rather than strategic issues. Neighbourhood planning is optional and a Neighbourhood Plan can only be written by a designated Neighbourhood Forum for a designated Neighbourhood Area. Neighbourhood Plans, once made, form part of the borough's Development Plan. In this borough, the Ham and Petersham Neighbourhood Forum is preparing a Neighbourhood Plan for its area.

**Office**

A building or premises falling within the B1(a) Use Class Order.

**Other Open Land of Townscape Importance**

Open areas, which are not extensive enough to be defined as Metropolitan Open Land, but act as pockets of greenery of local significance, contribute to the local character, and are valued by residents as open spaces in the built up area. These areas can include public and private sports grounds, some school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees.

**Open Space**

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All land that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers a broad range of types of open spaces, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

### Parade of Local Importance

Centres categorised in the fourth tier of the borough's centre hierarchy: Ashburnham Road, Fulwell, Ham Street/Back Lane, Hampton Nursery Lands, Hospital Bridge Road, Kew Green, Kew Road, Lower Mortlake Road, Nelson Road, St Margarets Road (north of the A316), Sandycombe Road (Kew), Strawberry Hill, Twickenham Green, Waldegrave Road, Whitton Road. These centres are important for meeting mainly local but valued needs for communities. Many are defined on the Proposals Map by an Area of Mixed Use boundary (AMU).

### Permitted Development Rights

Permitted Development Rights are a national grant of planning permission, which allow certain building works and changes of use to be carried out without having to make a planning application. Permitted Development Rights are subject to conditions and limitations to control impact and to protect local amenity.

### Planning Condition

A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990).

### Planning Obligation

A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. A Planning Obligation places a charge on the land to which it relates.

### Planning Practice Guidance (PPG)

The national Planning Practice Guidance was published by Government as a web-based resource in March 2014 (and as amended), adds further context to the NPPF. Local planning authorities should have regard to advice contained in the PPG when developing their plans. The PPG is also a 'material consideration' when taking decisions on planning applications.

### Playing Field

The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010.

### Previously Developed Land

Previously-developed land is that which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. This excludes land in built-up areas such as private residential gardens, parks, recreation grounds and allotments and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

### Proposals Map

A supporting document illustrating the spatial policies of the adopted plans.

### Public Open Space

Parks and similar land for public use, whether provided by the Council, or privately, where access for the public is secured by virtue of legal arrangements.

### Public Realm

This is the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces.

**Public Transport Accessibility Levels (PTAL)**

A measure of the relative accessibility of a point to the public transport network, taking into account walk access time and service availability (the higher the PTAL score, the better the accessibility).

**Registered Providers**

These are normally approved housing associations, who provide social housing for the Council, previously known as Registered Social Landlords. The Registered Providers share the Richmond Housing Register and must be approved by the Homes and Communities Agency.

**Renewable Energy**

Energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy. Although not strictly renewable, geothermal energy is generally included.

**Residential Care**

Residential care homes are residential developments where a number of older people live, usually in single rooms, and have access to on-site care services. A home registered simply as a care home will provide personal care only – help with washing, dressing and giving medication. Care homes with nursing provide the same personal care, but also have a qualified nurse on duty twenty-four hours a day to carry out nursing tasks. These homes are for people who are physically or mentally frail or people who need regular attention for a nurse. Homes registered for nursing care may accept people who just have personal care needs but who may need nursing care in the future. Residential care homes are regulated by the Care Quality Commission.

**Retrofitting**

The addition of new technology or features to existing buildings in order to make them more efficient and to reduce their environmental impacts.

**Richmond Biodiversity Action Plan**

A plan that sets objectives and actions for the conservation of biodiversity in the borough. The action plan also identifies priority species and habitats for conservation.

**Scoping Report (Sustainability Appraisal)**

This includes baseline information and identifies key environmental and sustainability issues for the borough. It sets out the framework for conducting a Sustainability Appraisal of the policies and sites as set out in this Plan.

**Site of Special Scientific Interest (SSSI)**

Protected area of land considered worthy of protection and of special interest by reasons of its flora, fauna or geological features. SSSIs are designated by Natural England under the Wildlife and Countryside Act 1981.

**Significance (Heritage)**

The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

**Social Inclusion**

The position from where someone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers for people or for areas that experience a combination of linked problems such as unemployment, poor skills, low incomes, poor housing, high crime environments, bad health and family breakdown.

**Statutory Development Plan**

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The statutory development plan is the plan for the future development of an area. It consists of:

- Local Plans: development plan documents adopted by local planning authorities, including any 'saved' policies from the Unitary Development Plan
- The London Plan: the spatial development strategy prepared by the Mayor of London
- Neighbourhood plans: where these have been supported by the local community at referendum and subsequently made by the local planning authority.

### Strategic Environmental Assessment (SEA)

Required by European and UK law, SEA is a way of systematically identifying and evaluating the impacts that a plan is likely to have on the environment. The aim is to provide information in the form of an Environmental Report that can be used to enable decision makers to take account of the environment and minimise the risk of the plan causing significant environmental damage. Government guidance advises that where a plan requires both strategic environmental assessment and sustainability appraisal, that the former process should be integrated into the latter one.

### Strategic Flood Risk Assessment (SFRA)

A Strategic Flood Risk Assessment is a study carried out by one or more local planning authorities to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the impact that land use changes and development in the area will have on flood risk.

### Sui Generis

Uses which do not fall within any Use Class. Such uses include betting offices / shops, theatres, larger houses in multiple occupation, scrap yards, launderettes, night clubs and pay day loan shops.

### Supplementary Planning Documents (SPD)

Documents which add further detail to the policies in the Local Plan. SPDs can be used to provide further guidance for development on specific sites, or on particular issues, such as design. SPDs are material considerations in planning decisions but are not part of the statutory development plan.

### Supplementary Planning Guidance (SPG)

SPGs have been produced by the Council to provide greater detail on policies. Since 2004, the Council has no longer produced SPGs as they have been replaced by SPDs. However, the Council's SPGs remain material considerations in planning decisions unless withdrawn.

The Mayor of London produces SPGs to provide further guidance on policies in the London Plan that cannot be addressed in sufficient detail in the plan itself.

### Sustainability Appraisal (SA)

The Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development. Sustainability Appraisal is a systematic appraisal process. The purpose of Sustainability Appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document from the outset of the preparation process. This will ensure that decisions are made that accord with sustainable development.

### Sustainable Drainage Systems (SuDS)

A sequence of management practices and control structures designed to drain surface water in a sustainable way. SuDS aims to control surface water runoff as close to its origin as possible, which involves moving away from traditional piped drainage systems to schemes that mimic natural drainage regimes.

### Tall Building



A building defines as 18 metres in height or higher (approximately six storeys or above).

### **Taller Building**

A building defined as being significantly taller than the neighbouring buildings, but less than 18 metres in height (below six storeys).

### **The Richmond upon Thames Partnership**

The Richmond upon Thames Partnership brings together the public, private and voluntary and community sectors. It has representatives from the public sector, business, community, voluntary and faith sectors who harness joint resources to improve the quality of life for everyone who lives in, works in or visits the borough. The Richmond Partnership has an Executive Group which draws together senior members of the Council, Richmond Adult Community College, Richmond Voluntary Services, Police, Fire Brigade, Richmond upon Thames College, Achieving for Children and the Clinical Commissioning Group. For further information, see the [Council's website](http://www.richmond.gov.uk/richmond_upon_thames_partnership) at [www.richmond.gov.uk/richmond\\_upon\\_thames\\_partnership](http://www.richmond.gov.uk/richmond_upon_thames_partnership)

### **Third Generation (3G) playing pitch**

A type of artificial grass pitch (AGP) known as 'third generation turf' made of rubber crumb that can be used for football and matches.

### **Transport Assessment (TA)**

A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.

### **Transport Statement (TS)**

A simplified version of a Transport Assessment where it is agreed the transport issues arising out of development proposals are limited and a full Transport Assessment is not required.

### **Travel Plan**

A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action and is articulated in a document that is regularly reviewed.

### **Tidal water**

The part of the River Thames that is subject to tides.

### **Urban Heat Island Effect**

The absorption and retention of heat that results in urban areas becoming warmer at night than rural areas.

### **Use Classes Order**

The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'.

### **Village**

A term applied to define the distinct and local areas in this borough as determined by local communities.

### **Village Plans / Village Planning**

Village Plans have been developed for each of the borough's 14 villages. Each Village Plan describes a vision for the village area and identifies what the Council will do and what people can do to achieve the vision together. It sets out the key issues and priorities and provides background information on the village areas. The Village Plans are maintained on the Council's website and are updated on a regular basis. They cover a wide range of

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topics, including matters not within the remit of the Village Planning Guidance SPDs. See the [Council's website](http://www.richmond.gov.uk/village_plans) at [www.richmond.gov.uk/village\\_plans](http://www.richmond.gov.uk/village_plans) for further information.

### Village Planning Guidance SPDs

SPDs that are being developed for the borough's villages (with the exception of Ham and Petersham, where the designated Neighbourhood Forum is developing its own Neighbourhood Plan for the area), which identify the key features and characteristics of the area, including the most important aspects and features that contribute to local character and that are valued by local communities. They form part of the Village Plan for area.

### Zero Carbon (subject to the Government's final definition for zero carbon)

A zero carbon development is one whose net carbon dioxide emissions, taking account of emissions associated with all energy use, is equal to zero or negative across the year. The definition of "energy use" will cover both energy uses currently regulated by the Building Regulations and other energy used in the home.



A detailed, light-colored map of the London Borough of Richmond upon Thames serves as the background for the page. The map shows various streets, parks, and landmarks, including Osterley Park, Hounslow, Twickenham, Fulwell, and Molesey. The map is oriented with North at the top.

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