LONDON BOROUGH OF RICHMOND UPON THAMES

Richmond upon Thames Local Plan 'The best for our borough' (2024 to 2039)

Planning

7 October 2025

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1 Foreword (TBC)

1.1 To be added later in the preparation of the Plan process.

2 Introduction

Setting the Scene

2.1 The Council's new Local Plan will set out policies and guidance for the development of the borough over the next 15 years, from the date of its adoption. *This is the plan for the borough of Richmond upon Thames. All subsequent references to the abbreviated 'Richmond Local Plan' refer to this boroughwide plan.*

2.2 The Local Plan sets out the Council's proposed vision, objectives and spatial strategy. It includes place-based strategies, site allocations and policies which support the delivery of the Plan's vision and objectives and spatial strategy. It identifies where development is expected to take place and how places within the borough may change.

2.3 The role of the development plan is to guide decision making on planning applications and inform investment in social and physical infrastructure. The Planning and Compulsory Purchase Act 2004 requires that "... for the purpose of making any determination under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise".

2.4 This Local Plan is in accordance with national policy by applying a presumption in favour of sustainable development and the policies contained within it show how this is expressed locally. The Council will ensure that planning applications that accord with policies in the adopted Local Plan and the London Plan will be approved without delay, unless material considerations indicate otherwise.

2.5 The Local Plan has been prepared within the context of a hierarchical framework of planning legislation and policy for England. At the top of the hierarchy are a number of planning related Acts of Parliament and Statutory Instruments, the National Planning Policy Framework ~~2021~~ *2023* (NPPF) which sets out Government's planning policies for England and how these should be applied, and the Planning Practice Guidance (PPG). Local authorities must take the NPPF into account when preparing Local Plans. This means in practical terms that the Council should follow national policy unless there is local evidence and circumstances that would justify a different approach.

2.6 Below national policy sits the London Plan, which is prepared by the Mayor of London. The Greater London Authority (GLA) Act 1999 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 2021, 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.

2.7 It is acknowledged that during the lifetime of this Plan, national policies, guidance and other legislation will be published. This may be able to be taken into account during the preparation of the Plan. Generally 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.

2.8 On adoption, this Local Plan supersedes the existing Local Plan (2018) and the Twickenham Area Action Plan (2013). The West London Waste Plan (2015) and the Ham & Petersham Neighbourhood Plan (2019) will not be superseded by the new Local Plan.

Preparing the Local Plan

2.9 Although the Richmond Local Plan had only been adopted in July 2018, commencing a new Local Plan was agreed in 2019 in the context of changes in national and regional policy and guidance, including a revised National Planning Policy Framework (NPPF) (2019) and changes to the London Plan. The climate emergency and growing population were also identified as reasons why a new Local Plan was needed.

2.10 The 'Direction of Travel' public consultation was undertaken during February to April 2020. This was an additional early stage of consultation not prescribed in the Local Planning Regulations, providing the opportunity for early engagement with interested parties and enabled Duty to Co-operate bodies, key stakeholders, national and local organisations, developers, landowners and the local community to comment. As part of this consultation, a Call for Sites from the community was requested.

2.11 The Council received 89 responses to the Direction of Travel consultation. All of these responses have been considered as part of the preparation of the Pre-Publication version of the Local Plan. A record of all the responses received and a summary of the comments made are available to view on the Council's website at www.richmond.gov.uk/new_local_plan_direction_of_travel_engagement

2.12 Public consultation on Pre-Publication version was carried out from 10 December 2021 to 31 January 2022. Comments were received from 311 respondents. All of these responses have been considered as part of the preparation of the Publication version of the Local Plan. A record of all the responses received and the Council's responses to the comments received, along with a summary of comments made and how issues raised have been dealt with, are available to view on the Council's website at www.richmond.gov.uk/draft_local_plan_pre_publication_version

2.13 The NPPF requires Local Plans to include strategic policies to address priorities for the development and use of land. The strategic policies of this Local Plan are as follows:

- Policy 1. Living Locally and the 20-minute neighbourhood
- Policy 2. Spatial Strategy: Managing change in the borough
- Policy 3. Tackling the climate emergency
- Policy 4. Minimising Greenhouse gas emissions and promoting energy efficiency
- Policy 5. Energy Infrastructure
- Policy 7. Waste and the circular economy
- Policy 8. Flood risk and sustainable drainage
- Policy 9. Water resources and infrastructure
- Policy 10. New Housing
- Policy 11. Affordable Housing
- Policy 17: Supporting our centres and promoting culture
- Policy 21. Protecting the Local Economy
- Policy 27. Telecommunications and digital infrastructure
- Policy 28. Local character and design quality
- Policy 34. Green and Blue Infrastructure
- Policy 47. Sustainable travel choices
- Policy 49. Social and Community Infrastructure
- Policy 50. Education and Training
- Policy 51. Health and Wellbeing

2.14 Public consultation on this Publication version is to be carried out from 9 June 2023 to 24 July 2023. This is in accordance with the requirements of Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012 and the Council's adopted Statement of Community Involvement.

2.15 The timetable for the development of the new Local Plan is set out in the Council's Local Development Scheme (update pending) and is summarised in the table below:

Table 2.1 Local Plan Timetable

What	When
Informal consultation on vision, objectives, spatial strategy, and issues, alongside consultation on Sustainability Appraisal (SA) Scoping Report and Call for Sites consultation	Spring 2020 (completed)

What	When
Pre-publication consultation on draft plan and consultation on the draft Plan and SA (Regulation 18)	10 December 2021 – 31 January 2022
Publication consultation on the Council's final version of the Plan and final SA report (Regulation 19)	9 June to 24 July 2023
Submission of the Council's final version of the Plan to the Secretary of State	Late summer/early autumn 2023
Independent Examination in Public	Autumn/Winter 2023/24
Adoption of the Local Plan	Winter 2024/25

2.16 The Government announced in 2020 a wide range of proposals for the reform of the planning system, including fundamental changes as to how Local Plans are prepared. However, the Government's Chief Planner also advised local authorities that they should not let uncertainties stop them from progressing on the development of Local Plans. The *plan-making* reforms in the Levelling Up and Regeneration ~~Bill~~ *Act* ~~(LURB) are being brought forward, however there will need to be secondary legislation/regulations and a transition period, therefore the changes~~ will only be relevant to the next Richmond Local Plan*, as this Plan is being prepared under the transitional arrangements*.

2.17 *Annex 1 of the NPPF (December 2023) set out that under transitional arrangements this Local Plan will be examined under the relevant previous version of the Framework as applicable at the time of pre-submission. This Plan has been examined against the NPPF as at September 2023, however for readability references are also made to the version as at December 2023.*

Consultation on this Plan and associated documents

2.18 The following documents are available on the Council's website www.richmond.gov.uk/draft_local_plan_publication_version:

1. **Publication Local Plan (this document)**: this sets out the vision, objectives, spatial strategy, draft place-based strategies, Site Allocations and policies to guide future development. Where relevant, it indicates the changes to the Policies Map designations (these boxes will be removed from the final adopted version of the Local Plan). (The existing Policies Map (reflecting the Local Plan adopted in July 2018 and March 2020) is as described on the Council's Policies Map webpage www.richmond.gov.uk/policies_map_for_local_plan_review_2015_18 and shown on the interactive map)
2. **Sustainability Appraisal of the Publication Local Plan**: this sets out how the economic, environmental and social effects that may arise from the Local Plan (for the place-based strategies, site allocations and policies) have been assessed and taken account of.

2.19 The following supporting documents and background papers, are also made available alongside the main consultation documents:

- **Habitats Regulations Assessment (HRA)**: this establishes whether the draft Local Plan, alone or in combination with other plans or projects, is likely to have a significant effect on any protected international / European nature conservation site, i.e. Special Protection Areas (SPA), Special Areas of Conservation (SAC) or Ramsar sites. If this is the case, then the impacts on the integrity of the site must be considered

by an Appropriate Assessment. This document sets out the findings of the Screening Assessment as well as the Appropriate Assessment for the emerging Richmond Local Plan.

- **Equalities Impact Needs Assessment (EINA)**: this assesses the draft Local Plan against protected equalities characteristics. The assessment has been undertaken to ensure that any potential negative equalities consequences arising out of the draft Local Plan have been considered and, where possible, removed or minimised so that opportunities for promoting equality and diversity are maximised.
- **Health Impact Assessment (HIA)**: this sets out the findings of the assessment of the health and wellbeing impacts of the draft policies and site allocations.
- **Updated local evidence**: This includes the following updated evidence:

- Urban Design Study 2021 and 2023 update
- Open Land Review (Green Belt, MOL, LGS and OOLTI) (2021 and Errata 2023)
- Local Housing Needs Assessment (2021 stage 1 and 2023 update)
- Employment Land & Premises Needs Assessment (2021 and 2023 update)
- Richmond upon Thames Retail & Leisure Study Phase 1 (2021) and Phase 2 (2023) *and Update Addendum April 2024*
- Strategic Flood Risk Assessment (2020)
- Flood Risk Sequential Test (2021 and update 2023)
- Review of Sites of Importance for Nature Conservation (2021 and 2022)
- Retail Research (2023)
- Local Green Space Assessment of Proposed Sites (2023)
- Carbon Net Zero Study (2023)
- Open Space Assessment (2023)
- Research on Gypsies and Travellers (2023)
- Infrastructure Delivery Plan (2023)
- Whole Plan Viability Study (2023)

Strategic Context and Trends

2.20 The borough is facing a number of key challenges, opportunities and critical planning issues. In addition, the draft Plan has been prepared during the challenging times of the COVID-19 pandemic which caused dramatic changes in the short-term, and an uncertainty about how behavioural and societal change may alter in the medium to long term. A cost of living crisis has brought further pressures on resource and income.

Our place in London

2.21 The borough covers an area of 5,095 hectares (14,591 acres) in southwest London. We are bordered by four London Boroughs (Kingston, Hounslow, Wandsworth and Hammersmith & Fulham) and share a boundary with Surrey (Elmbridge and Spelthorne Boroughs). Together with Croydon, Kingston, Merton and Sutton, we are part of the South London Partnership, which focuses on shaping sustainable growth across the sub-region.

2.22 We value our special and unique natural and historic environment. We play a significant role in providing opportunities for recreation, sport, culture and tourism for not only those who live and work in this borough, but also for those from neighbouring and other London boroughs.

2.23 We cannot act in isolation and therefore work hand in hand with communities and local partners. Our partner organisations and agencies include those within the public sector, business, community, voluntary and faith sectors. We also work closely together with neighbouring boroughs as well as the Mayor of London, the Greater London Authority (GLA) and Transport for London (TfL), particularly on issues which cross borough boundaries.

The borough today, and what we know about a growing and changing population in the future

2.24 The borough is prosperous, safe and healthy. The borough's population is expected to grow and change, with an ageing population. A strong driver of recent population growth is natural change (births minus deaths), along

with net international migration, according to the boroughwide housing research, with a notable level of net internal out migration to other parts of the UK. The 2021 census revealed population growth had been lower than forecast, and the borough's population had been growing at a slower rate than the London average, with a 4% increase in the number of residents since the 2011 census compared with an 8% increase across London. The latest GLA projections (2020-based) estimate much lower future population growth, to reach 196,714 (identified capacity scenario), a 0.3% change by 2039, however there remain challenges around how the population will change.

2.25 The borough is an attractive location for families. We expect that residents move outwards from London, related to life stage (family formation due to parenthood, marriage, cohabitation) and affluence (greater wealth) from the private rented sector into owner occupation (first time buyers) and owner occupiers moving into larger family sized properties. Richmond has very high levels of home ownership in comparison to the London average, and has the highest house prices in Outer London.

2.26 A key challenge is to support an ageing population and the impacts on adult health and social care provision, for example both paid and unpaid carers. There is a projected change in the age structure of those aged 65+ to increase by 50% by 2039. Understanding how we can support the health and wellbeing of people of all ages is also key. The 2021 census showed Richmond has the third highest levels of very good health in England and the second highest in London, although there are health inequalities between more deprived and less deprived areas such as life expectancy.

2.27 A large proportion of the borough's workforce is employed in highly skilled jobs. The borough's economy benefits traditionally from the presence of outside workers through their spend in the local economy. Although around half of those who work in the borough also live in the borough, there are also strong commuting flows in and out. The impact of the COVID-19 pandemic on different sectors, patterns of remote working and long-term trends is unclear. The connectivity to Heathrow and central London by public and private transport is an asset, and supports those commuting in and out for work. Education attainment levels are the highest amongst the Outer London boroughs, as is gross weekly pay. While overall deprivation levels in the borough are low, there are also pockets of relative disadvantage around Castelnau, Ham, Hampton Nursery Lands, Heathfield, Mortlake and Whitton. However, with such a highly skilled local workforce in professional and managerial jobs, a large amount of self-employed, and one of the most entrepreneurial boroughs in the country, there is scope to adapt and face the post pandemic challenges with a strong local economic recovery.

2.28 The borough's unique characteristics are an asset, but also a constraint. Richmond is the only London Borough spanning both sides of the River Thames, and the area is interspersed with open space, linked by roads and interwoven by railways. This determines the character and connectivity of the area, as well as the nature of the population and workforce, with distinct variations across the borough.

2.29 More than two thirds of the borough is protected by either open space or conservation area status. There are open spaces including historic landscapes such as Richmond and Bushy Parks and the Old Deer Park, the River Thames and the River Crane corridors, and other tributaries. The Arcadian Thames landscape running through the borough is the setting of a number of parks, palaces, towpaths, open spaces and places of cultural and historic importance. The area is also one of high archaeological importance.

2.30 Approximately 4.5 million tourists visit the borough every year, generating an income of £200m. Visitors come to major attractions within the borough such as Royal Botanic Gardens Kew, Hampton Court Palace, the Wildfowl and Wetland Centre in Barnes, the Rugby Football Union at Twickenham and other sporting venues. The Royal Botanic Gardens Kew are one of only four World Heritage Sites in Greater London.

2.31 The largest town centre is Richmond; there are also four large town centres at Twickenham, Teddington, East Sheen and Whitton and many smaller centres and local parades. The borough is primarily residential in character, interspersed with some locations for commercial and industrial uses, including riverside industries such as yards for building and repairing small crafts.

2.32 The constraints mean that land values are high and opportunities for new development are limited. Finding space to accommodate needs is difficult, whether it be for jobs, community uses, or new housing. The scarcity of land pushes prices even higher, and affordability is a particular concern. The borough is the most expensive Outer London borough to buy and rent, with relatively few social homes. The difficulties of finding new sites for affordable housing has exacerbated pressures over time, affecting residents on lower incomes and the most vulnerable in our communities, including rough sleepers and older residents.

Responding to a changing environment

2.33 In summer 2019, we declared a climate emergency and adopted our Climate Emergency Strategy in January 2020, forming one of the key drivers for change in this Local Plan. We are committed to taking robust action to tackle the local and global threat of climate change to the people and the borough, both internally and in partnership with local organisations and residents. We want to minimise our environmental impact by cutting carbon and other emissions, waste and pollution. For Richmond's long-term sustainability and prosperity, we need to ensure that the borough is prepared for the adverse impacts of climate change, particularly those resulting from extreme weather events such as heat waves, droughts and flooding.

2.34 Official data from the Department for Business, Energy and Industrial Strategy (BEIS) provides a reliable long term measurement of some of our emissions. The data collected covers fuel use such as gas, electricity, as well as petrol/diesel use in vehicles in the borough. Although it reports direct and energy indirect emissions for the borough, it does not provide a full picture as it does not include emissions linked to flying, or from waste, or from the products we buy and consume.

2.35 The BEIS data shows that carbon emissions from the borough have reduced from 1086.6 kilotons of CO2 (ktCO2) in 2005 to 567.7 ktCO2 in 2020, a reduction of 47.7%. When looking at per capita emissions (the amount of CO2 per person in the borough) we have gone from 6.0 tons per person in 2005 to 2.93 tons per person in 2020, a reduction of 51.6%. In the last 5 years, from 2014 to 2020, total emissions have reduced by 20.4% and per capita emissions have reduced by 19.4%. The majority of these emission reductions have come from electricity usage (57.5% of total reductions since 2005), which is linked to the decarbonisation of the electricity grid and the shift to renewable energy generation nationally.

2.36 Half of total borough emissions (50.5%) come from domestic sources, which means the electricity and gas use in homes, with 30.3% coming from transport and the rest from industry and commerce. Of domestic carbon emissions, nearly three quarters (76.3%) comes from gas use for heating and cooking, which highlights the importance in improving the energy efficiency of homes in the borough and moving from using gas to heat our homes and towards much wider use of heat pumps and other renewable heating technologies as a source of heating.

2.37 The challenge to respond to climate change is therefore influenced by land uses and the type and location of new development, but also permeates into many aspects of sustainable place-making – for example through travel patterns, the importance of open spaces, biodiversity and trees, and managing water and waste resources.

2.38 Biological diversity is the resource upon which families, communities, nations and future generations depend. It is the link between all organisms on earth, binding each into an interdependent ecosystem, in which all species have their role. It is the web of life. Tackling biodiversity loss and conserving biodiversity is now non-negotiable; investing in biodiversity is a strategic investment for

our health, wellbeing and daily lives. Urban green spaces are critical habitats to support biodiversity. Although we can seek additional new on-site open space provision as part of larger developments to provide multi-functional benefits for biodiversity, climate change, health and recreation, additional residential development and population growth will likely bring more access pressure to the borough's parks and open spaces, many of which provide important habitats for protected and other species. Disturbance to species and damage to habitats through intense recreational use including trampling and erosion of habitats is a key challenge for the borough. It is good for everyone's health and well-being to be able to enjoy and engage with green and natural spaces near to home. Increasing and extending the amount and quality of green spaces in the borough and improving its quality and connectedness, has the potential to offer multiple ecosystem services while also supporting better and more equitable human health.

2.39 The COVID-19 pandemic highlighted that we can make adjustments to tackle threats to our society, which may have previously been considered as unrealistic or unachievable, such as the way we behave and the choices we make. For example, accelerating moves to a low carbon society through people choosing to walk and cycle since the pandemic, both for essential journeys and for exercise. There may be lasting positive environmental, social and well-being impacts, and the evidence base will continue to be kept under review. To promote and encourage this further, the 20-minute neighbourhood concept is critical to enable people to 'live locally', which is a key focus of this Plan.

Links with the Council's plans and strategies

2.40 The Local Plan takes account of other plans and strategies of the Council and is the main delivery mechanism for the spatial elements of the Council's Corporate Plan.

2.41 **The Council's Corporate Plan 2022-26**: sets out how we plan to become an engaging, open and innovative Council - one that has better local schools, is safer and greener, one that is fair and more affordable for all. There are four overarching objectives:

Making Richmond green

- Campaign and advocate for action on the climate emergency
- Enhance our natural environment and protect against flooding
- Council operations to be carbon neutral by 2030 – reduce waste, increase recycling, and continue to improve energy efficiency

Making Richmond safe

- Confront crime and antisocial behaviour (ASB)
- Be the safest London borough

Making Richmond fair

- Bounce back from the pandemic
- Fairer, more accessible, and more inclusive
- Help young people get a great start in life
- Look after those who need our help
- Get active, run events, have fun
- Invest in the Borough

How we work

- Make it easier to communicate with the Council and have your say
- Run the Council efficiently

2.42 The Plan also draws upon other key strategies produced by the Council. These include the Climate Emergency Strategy, Housing and Homelessness Strategy 2021-26, Active Travel Strategy 2020, Culture Richmond 2021 to 2031, the Joint Health and Wellbeing Strategy and the Prevention Framework 2021-2025.

2.43 We also work together with many organisations and local people in a range of partnerships. Our overarching partnership is the Richmond upon Thames Partnership, which brings together the public, private, voluntary and community sectors to improve the quality of life for all those who come to the Borough to live, work or visit.

Heathrow

2.44 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.

2.45 The Council's position on Heathrow is set out in the Corporate Plan 2022 – 2026. This sets out that the Council remain opposed to the Government's decision to expand Heathrow Airport, a third runway and further night flights, and that we will continue to work with other local authority partners, Greenpeace and the Mayor of London, to draw attention to the significant impacts on residents' lives.

2.46 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.

3 Vision and Strategic Objectives

3.1 The draft Plan is based around ten themes to inform the vision for growth in the borough.

3.2 This Local Plan sets out a strategic vision for shaping the future of our borough, looking ahead to what the borough will be like in 15-20 years' time, and providing a clear picture of the role that development should play in creating sustainable growth.

Local Plan Strategic Vision 'The best for our borough'

By 2039:

Growth has been accommodated across the borough, making use of the borough's much valued assets, and our centres have become adaptable and vibrant places for successful local communities.

Everything a local resident needs can now be reached within 20 minutes by foot or bike. This has been achieved through implementing the 20-minute neighbourhood concept, resulting in a borough with complete, compacted, connected neighbourhoods. Lessons have been learnt from the Covid-19 pandemic, which changed aspects of the way we live, work and connect with each other. Opportunities have been taken to redefine places and retain positive changes, which have increased active travel and use of open spaces, support for local centres and workspaces, and renewed the focus on tackling the climate emergency. All our residents can now 'live locally'; they can easily walk or cycle within 20 minutes to access essential services and fulfil their daily needs, in town and local centres and high streets that provide a range of shops, services, employment opportunities, cultural activities and social connections. *Improved access to public transport options aid connections to jobs and places, and have assisted with overcoming barriers for people who experience reduced mobility.*

The borough has been **responding to the climate emergency and taking action**, tackling the challenges of climate change, reducing flood risk, cutting emissions and improving air quality, and following the principles of a circular economy. New development has met high standards for sustainable design, increased urban greening and tackled the biodiversity loss by protecting species and habitats, and enabling them to adapt to a changing climate. So much has been achieved through the co-benefits of actions through the Local Plan, to improve resilience against climate change, which are picked up across the Local Plan's themes below. Actions have been stepped up and we have fulfilled the Council's commitment as an organisation to become carbon neutral by 2030, and support residents in reducing their climate impact. We are on our way to be a net-zero carbon borough by 2043, at the latest.

Residents have seen the impact of **delivering new homes and an affordable borough for all** through an increase in housing delivery on small sites and optimising large sites, with new affordable homes benefitting local residents, although affordability remains a challenge. Even in established residential areas and in our centres, additional homes have been created, through incremental intensification, with infill and conversions that are well-designed to bring positive benefits to communities and new developments have diversified housing options. A range of affordable housing has been delivered, with a future pipeline, supporting low- and middle-income residents and workers into low cost rent and homeownership options and providing housing options that let vulnerable residents live independently in their own homes.

The Council has played a role in **shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic**. There have been fundamental changes that had already been underway but were accelerated by the pandemic, which have significantly changed how we use our much-valued centres with aspects of our centres reimagined. Implementing the 20-minute neighbourhood concept and enabling people to 'live locally' ensured that our centres have remained attractive and provide a broader offer, so they continue to be able to adapt flexibly to further changes – with the use of multi-functional places changing in response to local needs and re-purposing of existing space. Most local shopping and services for day to day needs are easily accessed by walking and cycling, and many trips are linked to also include the leisure and cultural offer.

All of the borough's ~~main~~ *town* centres have capitalised on how much they are enjoyed by those living in the local area, as well as providing a wider offer attracting visitors. Richmond as a centre has capitalised on its strengths with the cultural quarter showcasing its strong arts, cultural and leisure offer enhanced by the town centres' riverside setting and unique attraction to visitors, with the benefit of a new and improved station. Twickenham has rejuvenated its key commercial and business areas and benefits from a flourishing cultural quarter, with a new focus created by the riverfront experience. Teddington has flourished with a distinctive local offer, providing a range of shops, employment, leisure, cultural, health and social facilities to support a range of community activities. East Sheen has adapted and refocused its local offer, and links with the new heart for Mortlake created by development at the Stag Brewery. Whitton has sustained its local offer, complemented by a new use for Kneller Hall. The borough's local centres and parades, which continue to play a key role in enabling our communities to 'live locally', have also adapted to meet growing local demands for local opportunities for shopping, working and leisure.

The Council has played a part in **increasing jobs and helping business to grow and bounce back following the pandemic**. The borough's Key Business Areas as well as the industrial land and business parks have been protected and investment in intensification has nurtured space accommodating modern businesses, with digital connectivity and infrastructure to support smart growth. Office space in our ~~main~~ *town* centres has adapted and local hubs provide space to work, rather than workers commuting daily out of the borough. The borough is a location where entrepreneurs and start-ups thrive, and there are flexible workspace options for businesses and those choosing to work locally, supported by training opportunities. The economy has increased resilience, with jobs created in the green economy as well as changes to how businesses operate to reduce carbon emissions and promote the circular economy.

The borough has been **protecting what is special and improving our areas (heritage and culture)** to remain the best place to live in London, as a result of the quality of the environment and life with high levels of satisfaction. Places are highly cherished by residents. The high quality design of new development has respected and enhanced the distinctive character of the borough, including our key heritage assets which contribute so significantly – listed buildings and Conservation Areas, historic parks as well as Royal Botanic Gardens, Kew World Heritage Site. The borough has sustained and enhanced a strong arts and cultural offer. This has contributed to the post pandemic recovery, providing a destination and reason to visit, locally from across the wider region and beyond.

There has been progress in **tackling biodiversity loss by retaining and improving existing as well as creating new biodiverse areas, increasing the quality of our green spaces, and greening the borough**. The outstanding natural environment and green infrastructure network, including the borough's parks and open spaces, wildlife corridors, biodiversity and habitats as well as the unique environment of the borough's rivers and corridors have been protected and enhanced. The value of local spaces and networks continues to be recognised – from parklets and greener streets to larger swathes of protected open land which have a role in providing the green lung for southwest London. New green spaces have been delivered as part of new major developments on-site, providing multi-functional benefits to biodiversity, climate change as well as human health and wellbeing. Local people feel connected to nature and care about the local environment and biodiversity. This has been achieved through outreach and education by providing formal and informal education opportunities as part of developments.

New development opportunities have been **improving design, delivering beautiful buildings and high-quality places** to build on the borough's unique character and strong and varied sense of place. The importance of the public realm and providing space for people to connect has been recognised, with new development our places creating opportunities for relaxation, play, exercise - including examples of good practice at Twickenham Riverside, Ham Close and Richmond Station.

There have been changes to enable **reducing the need to travel and improving the choices for more sustainable travel**. Active travel has increased, as the easiest choice to access the local network of well-connected places across the borough. This is linked with the Healthy Streets approach which has brought positive changes to the character and use of our paths, streets and spaces, with high quality, pleasant and attractive environments with clean air and enough space for dwelling, walking, cycling and public transport use, to reduce the dominance of vehicles. Improvements to public transport, including connectivity of interchanges and use of smart technologies, have enabled a good public transport experience.

Residents have seen new development **securing new social and community infrastructure to support a growing population**. Residents have access to a range of exceptional educational and training facilities, including a choice of schools and nurseries, community and healthcare facilities. Spaces have adapted to become flexible in how they serve their communities and their social value has been widely recognised, reflecting the importance of places for interaction to support a sense of community.

The Council has played a role in **creating safe, healthy and inclusive communities**. The importance of health, wellbeing and community has been at the forefront of new development, delivering new spaces and facilities to enable healthy lifestyles and inclusive access for all. Healthy Streets have created a healthy and inclusive environment. Health and care services and infrastructure support the population and have contributed to reducing health inequalities.

3.3 Strategic objectives

1. **Responding to the climate emergency and taking action**

- Provide a clear pathway to zero-carbon for all types of new development, to minimise and mitigate the effects of climate change by requiring high levels of sustainable design and construction, including reductions in carbon emissions by minimising energy consumption; promoting decentralised energy and the use of renewable energy; as well as requiring high standards of water efficiency.
- 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 resilience to the risk of flooding,

water shortages, subsidence and the effects of overheating.

- Optimise the use of land and resources by ensuring new development takes place on previously developed land and in sustainable locations; in line with the place based strategies, with a focus on reusing existing buildings and encouraging remediation and reuse of contaminated land.
- Reduce or mitigate environmental impacts and pollution levels (such as air, noise, light, odour, fumes water and soil) and secure improvements in air quality, particularly along major roads and areas that already exceed acceptable air quality standards.
- Encourage the incorporation of circular economy principles into all aspects of the design, construction and operation process in order to eliminate waste, conserve resources, and manage waste sustainably retaining its use at its highest value for as long as possible.
- 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.

2. **Delivering new homes and an affordable borough for all**

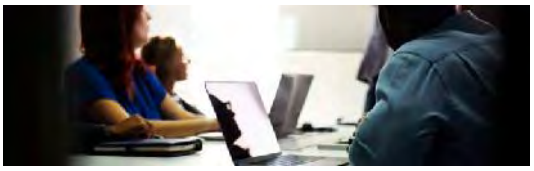
- Enable opportunities to deliver new homes across the borough, diversifying the sources, locations, type and mix of housing supply and the type of sites; through a positive approach to incremental intensification and recognising the contribution of small sites, housing in our centres and optimising delivery from large sites to meeting local housing needs.
- Maximise delivery of genuinely affordable housing across the borough through a range of measures, recognising the significant community benefits of affordable housing as a priority, and taking innovative and flexible approaches to delivery more affordable housing to meet the needs of Richmond residents.
- Promote inclusive and sustainable communities, through ensuring high standards in new housing and opportunities to build social interaction, to create cohesive, healthy and dementia-friendly communities, enabling the older population to remain independent and active for longer, as well as providing supported housing options to meet the needs of vulnerable residents.

3. **Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic**

- Create places where businesses can thrive and communities and visitors can access local shops and a wide range of services; as well as providing a leisure and cultural offer to meet the changing needs of our communities; to ensure vital viable, attractive and locally-relevant town and local centres.
- Reinforce the role of Richmond, Twickenham, Teddington, Whitton and East Sheen centres, where major new development should be focused in these most sustainable locations; while supporting local centres and parades which provide a focus for local communities to meet, shop, work and spend leisure time; as reflected in the place based strategies.
- Encourage change in our centres which will be key meeting places where social interaction and sense of community is fostered. They will act as hubs with clusters of uses, including providing opportunities for leisure and culture, to

ensure they are destinations for living and working locally; providing an opportunity for linked trips.

- Require measures in new developments that contribute to active travel and improve the public realm which in turn will support the centres' attractiveness and enable people to 'live locally'.
- Create 20-minute neighbourhoods that make it easier to be physically active; enhance opportunities for walking and cycling safely; create high quality public spaces and public realm; improve connectivity and accessibility for all; and focus on supporting the high streets, centres and parades as destinations that people want to go to and use to 'live locally'.



4. **Increasing jobs and helping business to grow and bounce back following the pandemic**

- Protect and encourage a range of land and floorspace for employment use, enabling intensification of uses where appropriate, and digital connectivity infrastructure, to support a cohesive, diverse and enterprising business community.
- Provide a variety of opportunities for affordable and adaptable workspaces, encouraging opportunities to work locally.
- Ensure a range of local employment and training opportunities available to residents and to support growing businesses.

5. **Protecting what is special and improving our areas (heritage and culture)**

- Protect and enhance the environment including the heritage assets, recognising their value to the borough's residents and visitors.
- Support the borough's diverse arts and cultural facilities, recognising their importance to enriching our local communities, while also providing a destination and reason to visit the borough and an opportunity to sustainably grow the visitor economy.

6. **Increasing biodiversity and the quality of our green and blue spaces, and greening the borough**

- Protect and enhance the borough's multi-functional green and blue infrastructure networks; improving accessibility from small spaces to corridors and larger expanses; recognising the benefits for residents and visitors and the value to the local economy.
- Create developments which enhance the natural environment and contribute to the comprehensive blue and green infrastructure network to enhance biodiversity.
- Plan for walkable environments which offers opportunities to improve biodiversity, particularly when considering street connectivity as well as wildlife corridors and the movement of flora and fauna across sites and networks.
- Protect and enhance the borough's biodiversity, including trees and landscapes; requiring from new development a genuine net gain that leaves biodiversity in a better state than before; and recognising the importance of dark spaces for some species.

- Require new major development to provide on-site green spaces with multi-functional benefits for biodiversity, climate change as well as health and wellbeing, including engaging with local community groups who are invested in the protection and enhancement of local green and blue assets and providing formal and informal education opportunities to enable people to learn about and connect with nature and biodiversity.
- Ensure new development wherever possible makes a positive contribution to greening of the borough's streets, buildings and public spaces; recognising its important role in tackling climate change.
- Protect and improve the borough's parks and open spaces, providing a balance between areas for wildlife and creating opportunities for relaxation, play, and exercise, recognising their appreciation by local communities and importance in providing for healthy active lifestyles.
- Protect and improve the unique environment of the borough's rivers, especially the River Thames and its tributaries, as wildlife corridors, as flood storage, as opportunities for recreation and river transport; *where appropriate* increasing access to and alongside the rivers*, taking opportunities to use nature flood management techniques* ~~where appropriate~~, and gain wider local community benefits and habitat improvements when sites are redeveloped.

7. **Improving design, delivering beautiful buildings and high-quality places**

- Create places that strengthen the connection between people and the physical places they share, that can adapt over time, contributing positively to compact and walkable 20-minute neighbourhoods.
- Provide a positive approach to accommodate growth across the borough, enabling tall buildings and higher density development in appropriate locations; where all development is of high design quality to create well-designed, meaningful, practical, resilient to climate change, and well-connected places.
- Ensure the design of new development draws on the special values of the boroughs unique and distinctive character and responds to areas for enhancement and opportunities for growth, following the Plan's design principles and place based guidance.

8. **Reducing the need to travel and improving the choices for more sustainable travel**

- Provide choice for how people can make their journeys through high quality connections between places; encouraging them to choose walking or cycling for short day to day journeys – shopping, study, community and healthcare facilities, places of work, green spaces, and more; without having to use a car, and maintaining increases seen in active travel.
- Encourage improvements to connectivity and access to public transport, particularly enabling safe, inclusive access; taking opportunities for car-free development and supporting new technologies to enable smarter travel, to minimise the impacts of development in relation to congestion and air pollution.

9. **Securing new social and community infrastructure to support a growing population**

- Support a range of social and community infrastructure uses, which provide social value to residents and cater for a growing population.
- Provide a community offer in the borough's centres and well-connected places, predominantly accessed by active travel.
- Ensure flexible spaces are provided as part of multi-purpose assets, which can adapt to changes and are well supported by the communities they serve.
- Ensure 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 and promoting local employment opportunities and training programmes.
- Encourage opportunities for leisure, entertainment, sport, and cultural activities, which enable active and inclusive lifestyles.

10. **Creating safe, healthy and inclusive communities**

- Create environments that enable active, resilient and inclusive communities and enable residents to lead safe and healthy lives; including recognising the importance of opportunities for place-based connections that put people first.
- Recognise the importance of health as a cross cutting priority, from the role of streets and public spaces to providing for health and care, wellness and fitness uses; ensuring inclusive access across all types of development and places, based on an inclusive neighbourhood approach, and supporting the Healthy Streets approach.
- 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 those in the surrounding area.

4 Spatial Strategy, Place-based Strategies and Site Allocations

Policy 1

Living Locally and the 20-minute neighbourhood (Strategic Policy)

A. To help people and places to thrive we need to transform the way we live. We need to create environments that make it easier to be physically active, enhance opportunities for walking and cycling safely, create high quality public spaces and public realm, improve connectivity and accessibility for all, and focus on supporting the high streets, centres and parades as destinations that people want to go to and use to 'live locally'. Creating a borough where everything a resident needs can be reached within 20 minutes by foot or bike will not only improve the quality of life but will bring multiple benefits of healthier lifestyles, cleaner air, stronger local economies and above all better resilience against climate change.

B. The 'living locally' concept will be achieved by:

1. giving people the ability to meet most of their daily needs, through a mixed pattern of land uses including food and necessities, within a 20-minute walk from home, with safe cycling and local public transport options;
2. facilitating access to quality public transport that connects people to jobs and other places they need to go to, especially improving inclusive access and overcoming barriers for people who experience reduced mobility;
3. promoting and enabling healthier lifestyles and active living by improving walking and cycling infrastructure to achieve the borough's target of 75% of trips being undertaken by walking, cycling and public transport;
4. offering a high-quality public realm and open spaces;
5. delivering new developments at densities that make local services and transport viable;
6. improving accessibility and connectivity of green infrastructure;
7. facilitating thriving local economies;
8. following the Mayor's Healthy Streets Approach to ensure walking and cycling are the natural choices for local journeys, and using the Healthy Streets Toolkit to assess new infrastructure schemes.

C. All development (except householder applications for alterations) should:

1. demonstrate how they will deliver improvements that support the 'living locally' concept;
2. be permeable by foot and cycle, with good connections and signage to local walking and cycling routes/networks as well as public transport;
3. demonstrate that future occupiers of the development are able to meet their shopping, work, recreational and cultural needs within a 20-minute walk or cycle and how the new development will contribute to sustaining the 'living locally' concept;
4. demonstrate that the proposals will not lead to any deterioration in the provision of, and access to, services to meet shopping, work, recreational and cultural needs for local communities;
5. demonstrate how a proposal will reduce the dominance of vehicles.

Major developments of 10 or more residential units or non-residential development of 500sqm of floorspace or more:

6. must demonstrate how the proposal will improve local walking and cycling routes, including accessibility to the existing network, in areas with lower levels of public transport accessibility or higher levels of health deprivation and disability.

D. The Council will make use of planning obligations to create or reinforce successful 20 minute neighbourhoods. This could be relating to play and recreational facilities, low traffic neighbourhoods, walking and cycling infrastructure and active travel networks, public space and public realm improvements, green infrastructure provision, daily service provision, in line with other policies in this Plan. Conditions may be applied to planning permissions to retain a specific land use to ensure the continued and reinforced provision of services that enable living locally.

~~**Information note for the Publication consultation: this policy is not about limiting movement. There are some concerns expressed that this concept, along with traffic measures, would restrict journeys. Any such restrictions are beyond the remit of the Local Plan and are not what the policy seeks to do. It is merely seeking to bring about a pattern of development that makes it an easy choice to 'live locally' and aims to improve, not restrict, accessibility and movement.**~~

4.1 The 20-minute neighbourhood concept is the idea that our places should be complete, compact and connected neighbourhoods where most things you need for shopping or visiting are an easy walk or cycle away. For many, the pandemic has highlighted the benefits of living locally and having facilities locally; it responds to the challenges of climate change, health, affordability and liveability. The 20-minute neighbourhood concept enables the borough's communities to 'live locally', a concept which is at the heart of this Local Plan. This concept takes a holistic approach and focuses on ease of travel, walkability and access to public services, and in light of the pandemic, it takes into account changing high streets, workplaces, cultural activities and social connections.

4.2 Changes in the way we shop were already affecting our high streets before the pandemic, particularly internet shopping; the pandemic and associated lockdowns have accelerated this trend. Recent changes to the planning system, particularly the introduction of the new combined business land Use Class E and changes to permitted development rights mean that there is even more potential for change in our high streets than ever before. As more of us stayed at home, many have realised the value of our neighbourhoods – places to get our essential goods and services, to relax and meet, to enjoy our leisure time and to appreciate our high quality open spaces.

4.3 Recognising the Council's role of working in partnership with stakeholders to consider the future of our high streets and town centres amid the changing times, a Richmond Partnership Conference was held in 2021 to discuss unlocking the potential of our centres. The headline outcomes discussed included the need for town centres and high streets to be destinations beyond shopping to attract and retain visitors, as people centred places that are appealing to pedestrians. The conference was followed by a series of virtual Community Conversations within each area of the borough. The results of those events have informed the preparation of this Local Plan.

4.4 The Mayor of London has set out a missions-based approach to meet the most challenging period in recent history in terms of restoring confidence in the city, minimising the impact on London's most vulnerable communities and rebuilding the city's economy and society following the coronavirus pandemic. One of the nine missions is 'High Streets for All', which sets out a clear intent to work with London's diverse communities to establish new, exciting and experimental uses across London's high streets and public spaces.

4.5 The mission seeks to stitch the essential uses of the city back together, following decades of dispersal and separation and invites us to rethink the way we live and move around the city. It also recognises that thanks to London's pre-industrial roots 90% of all Londoners live within with 10 minutes of their local high street. 'High Streets for All' focuses on the vital role that high streets and local neighbourhoods play in the economic and social life of the city, complements the Council's 'living locally' concept, a key feature of the borough's Spatial Strategy.

4.6 Unlike parts of central London, which rely heavily on commuters and visitors, Richmond borough needs to plan for and grasp the opportunities provided by more people living and working locally. There is potential to create a more participatory, inclusive and community-focused economy, with shared workspaces that enable collaboration, knowledge exchange and increased business productivity. To ensure we establish and maintain a 20-minute neighbourhood for all parts of the borough we need to build on the momentum of remote working by providing flexible and family friendly local work spaces, and this may also mean reimagining traditional workspaces as centres for collaboration, innovation and enterprise.

4.7 It is essential that the mix of land uses in the borough are preserved, where the historic patterns of development that have resulted in a mix of uses, such as a small employment site tucked away at the end of a road or a community use right in the heart on a quiet residential corner. These need to be preserved, both within individual areas and

on individual sites, to make efficient use of our limited land, enable successful places and reduce the need for journeys.

4.8 The 'living locally' concept relies on inclusive and attractive high streets and public spaces, promoting and encouraging walking, cycling and accessibility for all; this complements the Mayor's Healthy Streets approach as set out in ~~TP2~~ *Policy T2* of the London Plan. *It should also seek to reflect the Mayor's Vision Zero which aims to reduce road danger and create a safer transport environment for all.*

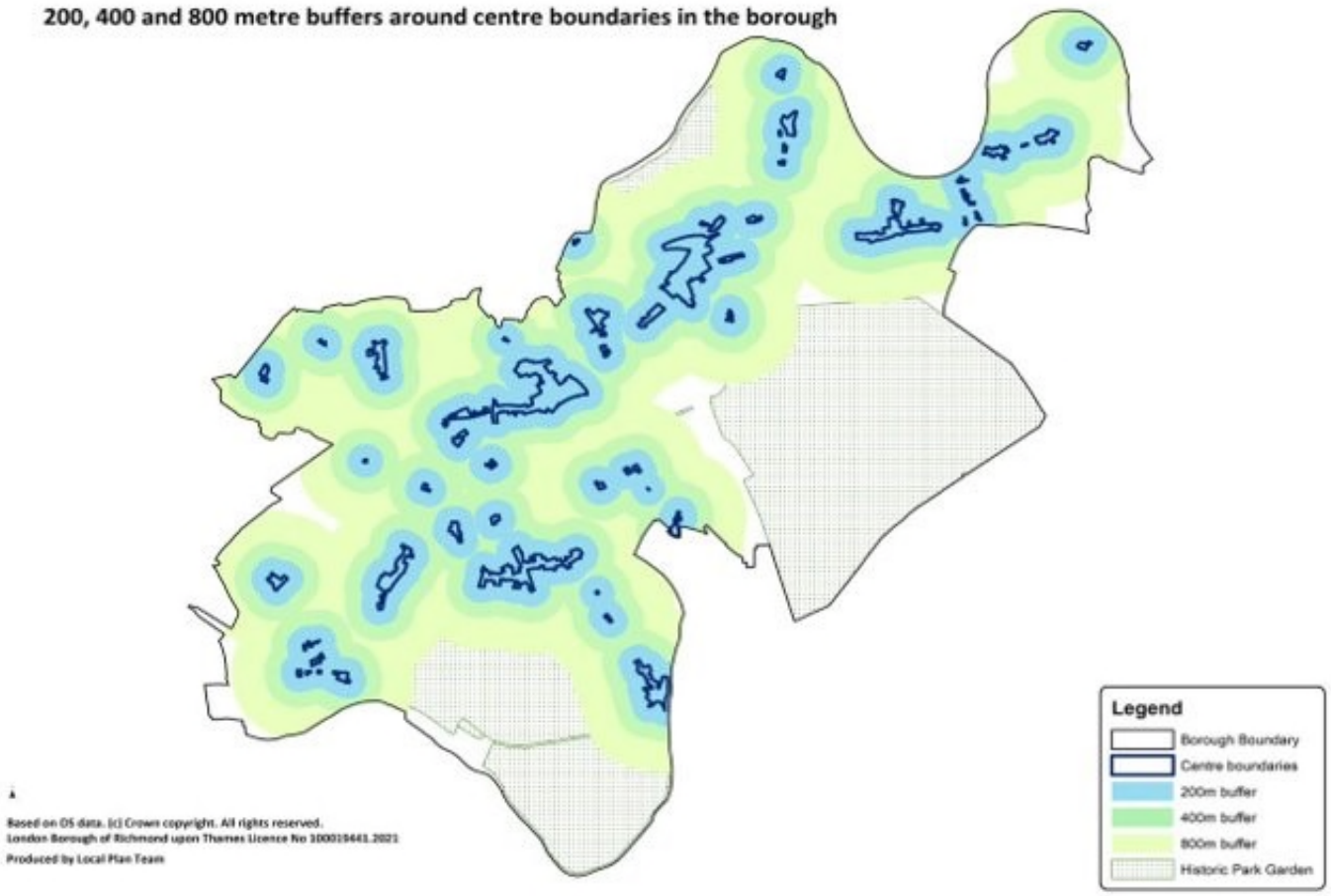
4.9 It is recognised that not all residents will be able to comfortably walk or cycle part of or the whole distance to meet their daily needs. People who experience reduced mobility such as older people, people with disabilities, and people with young children require more considered interventions such as an increased number of benches to provide respite, increased use of electric bikes and scooters, easier access to public transport, and supporting more covered bus shelters with seating. Priority should be given to the retention and, where appropriate, enhanced provision of disabled parking spaces for those whom it is a necessity. Policy 47 'Sustainable Travel Choices (Strategic Policy)' ensures inclusive mobility in new development.

4.10 One of the underlying fundamental aims of the 'living locally' concept in Richmond borough is to reduce urban carbon emissions and biodiversity loss. Environmental improvements in the public realm, changing the way we access our high streets to sustainable modes of transport and using local services and shops will help us tackle the climate and ecological emergencies whilst improving air quality, creating green jobs and enabling us to transition to a low carbon society.

4.11 To facilitate the 20-minute neighbourhood concept, the Council will ensure, through planning and other interventions, that local assets, businesses and partnerships are provided that local people want to use and value. This could for example include meanwhile uses and/or temporary leases for premises awaiting longer-term redevelopment, which could provide a range of creative and flexible community uses. Other innovative approaches will be supported by the Council, such as cycle-based local distribution hubs. High streets and neighbourhood centres will therefore not just provide services to meet daily essential needs, but they will also play a greater community, cultural and creative role.

4.12 The map below depicts the borough's centres, with different shaded buffers applied for 200, 400 and 800 metres. These buffers are applied 'as the crow flies' rather than actual walking distances. As a guide, 400 metres is an around 5-10 minute walk. Applying an 800-metre buffer, it is evident that most of the borough benefits from a centre or parade; therefore it is important to ensure that these centres are sustained and enhanced to continue meeting the 'living locally' concept for the majority of the borough.

Map 4.1 200, 400, and 800 metre buffers around centre boundaries in the borough.



4.13 The majority of the borough's residents already live within an 800-metre catchment of a town, local, or neighbourhood centre, or local parade. Development proposals should contribute to increasing accessibility of these centres by foot, bike, and public transport, thus reducing dependency on car use. Although it can be envisaged from any point in the borough, to implement the policy at a practical level emphasis is given to a liveable neighbourhood, and where these overlap people will relate to more than one place. There is no intention to set out zones with fixed boundaries.

4.14 The Council's Local Implementation Plan for Transport sets out active travel targets. It shows that residents in Whitton, Hampton and East Sheen are less likely to achieve the active travel target than those living in Twickenham, St Margarets and Richmond. There is a correlation between areas with low active travel levels and areas with both lower levels of public transport accessibility and higher levels of health deprivation and disability. There are pockets of relative deprivation around Castelnau, Ham, Hampton Nursery Lands, Heathfield, Mortlake and Whitton. The London Plan directs incremental intensification to existing residential areas within high Public Transport Accessibility Levels (PTALs) or close to stations or town centres, which will be shown on the Policies Map as identified in Map17.1 and Policy 16 'Small Sites'.

4.15 The Council will also use initiatives outside of planning to target these areas for both infrastructure improvements and community schemes, designed in partnership with Transport and Public Health. Interventions will include improving local walking and cycling routes to schools, town centres, bus stops and local rail stations, as well as softer measures such as school travel planning and promotion of cycling training to local residents.

4.16 Applicants are expected to demonstrate in planning documents such as Planning Statements, Design and Access Statements, Transport Statements, and other such supporting documents with an application, how the proposed development would contribute to "Living Locally". It should form part of the early stages of a site assessment, complementary to how a design-and character-led approach to development starts with a site analysis, putting "Living Locally' at the heart of understanding the existing context and how the proposal will contribute to the criterion in part C of the policy. While proportionate to the scale and type of development, if the location and nature of the proposal mean that improvements to deliver the 'living locally' concept are necessary, these should be clearly set out in an application. The Council will keep under review the need for further guidance to support the policy implementation, which could be integrated within updates of existing Supplementary Planning Documents (SPDs).

Policy 2

Spatial Strategy: Managing change in the borough (Strategic Policy)

The spatial strategy for Richmond upon Thames is for the plan period 2024 to 2039. The overarching aim is to ensure that growth is delivered in a sustainable way, with supporting infrastructure, while tackling the climate emergency and biodiversity crisis.

A. The Local Plan seeks to deliver the Council's vision and meet the identified needs by directing new higher density development including homes, jobs, community uses and infrastructure to sites in the town centres or places that are that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. New smaller scale development will be appropriate in the local centres to support Living Locally. Beyond these areas, incremental intensification will contribute to achieving growth, having regard to the existing townscape character.
B. Development in the borough will prioritise the use of previously developed land, including the reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment.
C. Development in the borough will promote the provision of green infrastructure that creates resilience and helps mitigate the impacts of climate change, and protect and, where possible, enhance the environment, local character and heritage assets.
D. Proposals should have regard to the relevant place-based strategy and set out how a character- and design-led approach to change has been taken.

4.17 The Spatial Strategy, as set out above, continues the approach taken in the adopted Local Plan. It builds on information from our evidence base, including feedback from public consultation 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.

4.18 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 – following the 'Living Locally' concept as set out above in Policy 1 'Living Locally and the 20-minute neighbourhood (Strategic Policy)'. The policies in the Local Plan follow the approach of the NPPF's presumption in favour of sustainable development. Paragraph 9 in the NPPF recognises planning policies should play an active role in guiding towards sustainable solutions, but in doing so should

take local circumstances into account, to reflect the character, needs and opportunities of the borough. The Council places 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. This includes the locally distinctive historic and cultural environment, protected parks and open spaces, the River Thames and its floodplain.

4.19 To understand future needs for housing, employment, retail and leisure, a Local Housing Needs Assessment, Employment Land & Premises Needs Assessment, and Richmond upon Thames Retail & Leisure Study ~~Phase 1 and Phase 2 have been~~ *were* undertaken*, which indicated the following overarching position*.

Housing: the London Plan sets the 10 year target of 4,110 net housing completions for the borough (2019/20 to 2028/29), based on a comprehensive study of capacity for housing delivery. The Local Housing Needs Assessment is an unconstrained assessment of the number of homes needed in the borough, following the Government's methodology. It identifies for affordable rent a need for 1,123 affordable homes per annum across the borough, and a need for ~~552~~ *284* affordable homes per annum for affordable home ownership; the unconstrained figures represent an acute affordable housing need.

Retail needs: Richmond upon Thames Retail & Leisure Study (Phase 2) forecasts that up to 2034, there is an over-supply of 2,900 sqm gross of retail *(comparison and convenience)* floorspace, and an undersupply of food/beverage floorspace of approximately 5,400 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,500 sqm gross *(retail and food/beverage)*. *An Addendum (April 2024) confirms up to 2034 an over-supply of approximately 3,000 sqm gross of retail (comparison and convenience) floorspace is forecast, and an under-supply of food/beverage floorspace of approximately 5,500 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,400 sqm gross (retail and food/beverage).* Put simply, the need for shopping space is forecast to decrease but the need to provide space for the food & beverage sector and potentially the wider leisure sector is increasing. There is currently no requirement to allocate sites for major retail development. In the short to medium term there is emphasis on repurposing existing floorspace, with the study finding the existing stock of premises can play a role in accommodating project growth, through vacant properties and growth in sales densities.

Employment needs: The borough's Employment Land & Premises Needs Assessment advises the Local Plan should seek to accommodate growth of 60,000 sqm industrial floorspace but recognises there are few options to address this deficit. For office floorspace there is a shortfall of approximately 23,000 sqm and it advises the Local Plan should take a stringent approach to resist losses.

4.20 Two boroughwide studies have been undertaken which together form the basis for a holistic understanding of the borough's constraints and capacity for growth - a boroughwide Urban Design Study and Open Land Review (Green Belt, Metropolitan Open Land (MOL), Local Green Space (LGS) and Other Open Land of Townscape Importance (OOLTI)).

The *Urban Design Study* provides a boroughwide townscape character assessment, with a deep understanding of the values, character and sensitivity of the different parts of the borough, combined with the reality of future development pressures to assess capacity. It recognises a large proportion of the borough has high sensitivity to change, including the large open spaces and river corridors. There are few areas of lower sensitivity to change.

The *Open Land Review* (Green Belt, MOL, LGS and OOLTI) examined the performance of designated open space against relevant national, regional and local purposes and criteria. Much of the borough is covered by these open space designations, which collectively play important roles including preventing the sprawl of Greater London and the coalescence of neighbourhoods, contributing to the character of neighbourhoods and providing green spaces for recreation, nature and associated health and wellbeing

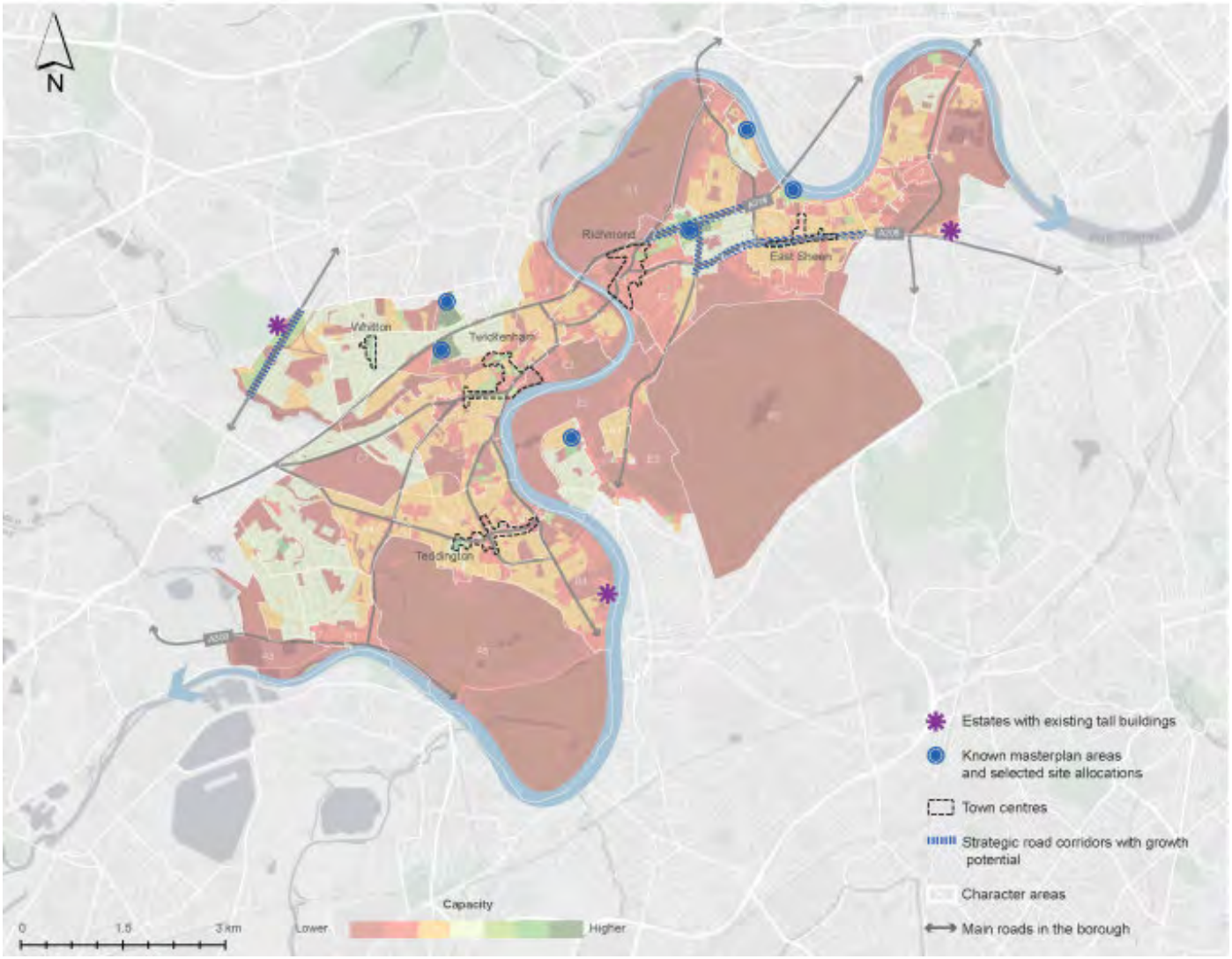
impacts. The open spaces also have an important role to play as part of the borough's green infrastructure network, which is considered more widely as part of other evidence base studies. Land designated as Green Belt was assessed to meet the purposes strongly and all land was recommended for retention. The majority of the MOL has been assessed as performing strongly, with some areas scoring weakly against the MOL criteria. The study has also assessed existing OOLTI, the majority of which meet the criteria for designation. The Study also assessed a number of potential sites for LGS designation, some of which are taken forward as new designations, supported by the Local Green Space Assessment of Proposed Sites. Overall, there are changes to only a small number of existing or new sites as reflected in this Local Plan.

4.21 While we need to plan for more homes and jobs, and the supporting infrastructure, there are limited sites in the borough. We must focus on making the most of our limited land supply. The London Plan's Good Growth policies seek to make the best use of land, to create successful mixed-use places. The borough's historic environment and its protected open spaces significantly limit the opportunities for development within the borough. Only one site has been found where exceptional circumstances were considered justified to release from MOL for affordable housing.

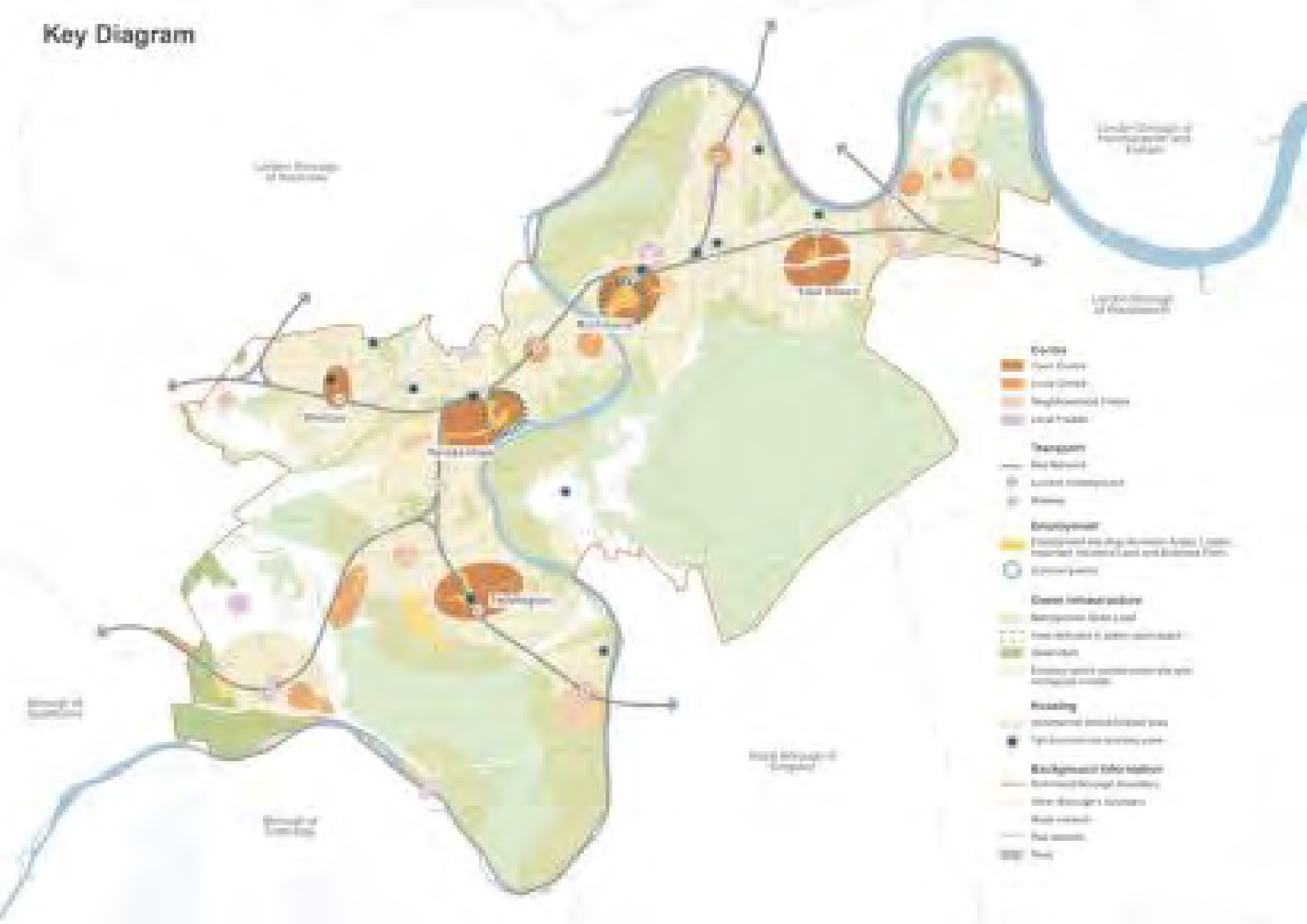
4.22 With such limited sites in the borough, the overarching spatial strategy continues to direct major development into the five town centres (i.e. Richmond, Twickenham, Teddington, Whitton and East Sheen), and to support 'Living Locally' through the network of local centres, neighbourhood centres and parades spread across the borough, with incremental intensification of existing communities as envisaged by the London Plan. The London Plan directs incremental intensification to existing residential areas within high PTALs or close to stations or town centres. Most new developments are focused on small brownfield sites, with a small number of larger sites identified within the Local Plan and its Site Allocations.

4.23 The Urban Design Study identifies the capacity for growth in the borough using the findings of the characterisation study. The London Plan requires a borough-wide growth assessment (London Plan Policy D1) and sets the expectation for a design-led approach to determine the optimum development capacity of sites. The Urban Design Study sets out an overall development strategy, with the broad areas that form part of the strategy for tall and mid-rise buildings. There are only a few contained areas within the borough which have capacity for tall buildings, within town centres, and/or within previously developed sites, along with some capacity for mid-rise buildings. Only one character area in the borough, in East Kew, is identified with a long-term opportunity to transform the character of the area.

Map 4.2 Urban Design Study overall development strategy



Key Diagram



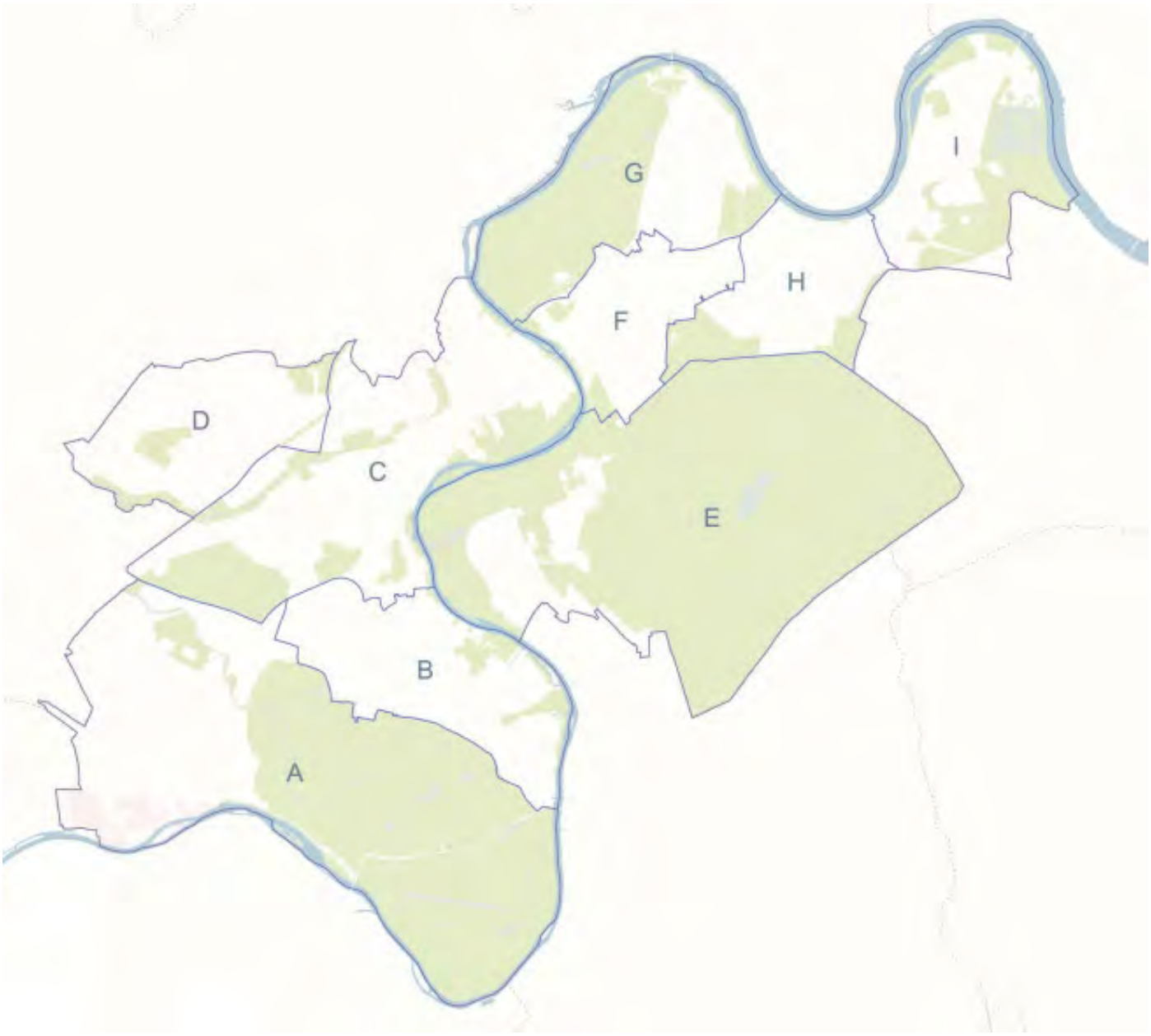
5 Places

5.1 To achieve the vision and strategic objectives of the Local Plan, broad spatial strategy and overall distribution of growth set out above, there is a place-making strategy for each area to articulate how this will be delivered.

5.2 The borough has been divided into nine high-level 'places', based on categorisation to reflect a 'sense of place' as well as identifying areas recognised as 'places' by local people as part of the Urban Design Study. To inform the Urban Design Study, a consultation in 2021 invited feedback on what people valued in their area, including the valued features, which are referred to below. The nine places are:

- *Policy PBS1* Hampton & Hampton Hill (A)
- *Policy PBS2* Teddington & Hampton Wick (B)
- *Policy PBS3* Twickenham, Strawberry Hill & St Margarets (C)
- *Policy PBS4* Whitton & Heathfield (D)
- *Policy PBS5* Ham, Petersham & Richmond Park (E)
- *Policy PBS6* Richmond & Richmond Hill (F)
- *Policy PBS7* Kew (G)
- *Policy PBS8* Mortlake & East Sheen (H)
- *Policy PBS9* Barnes (I)

Map 5.1 Borough Places

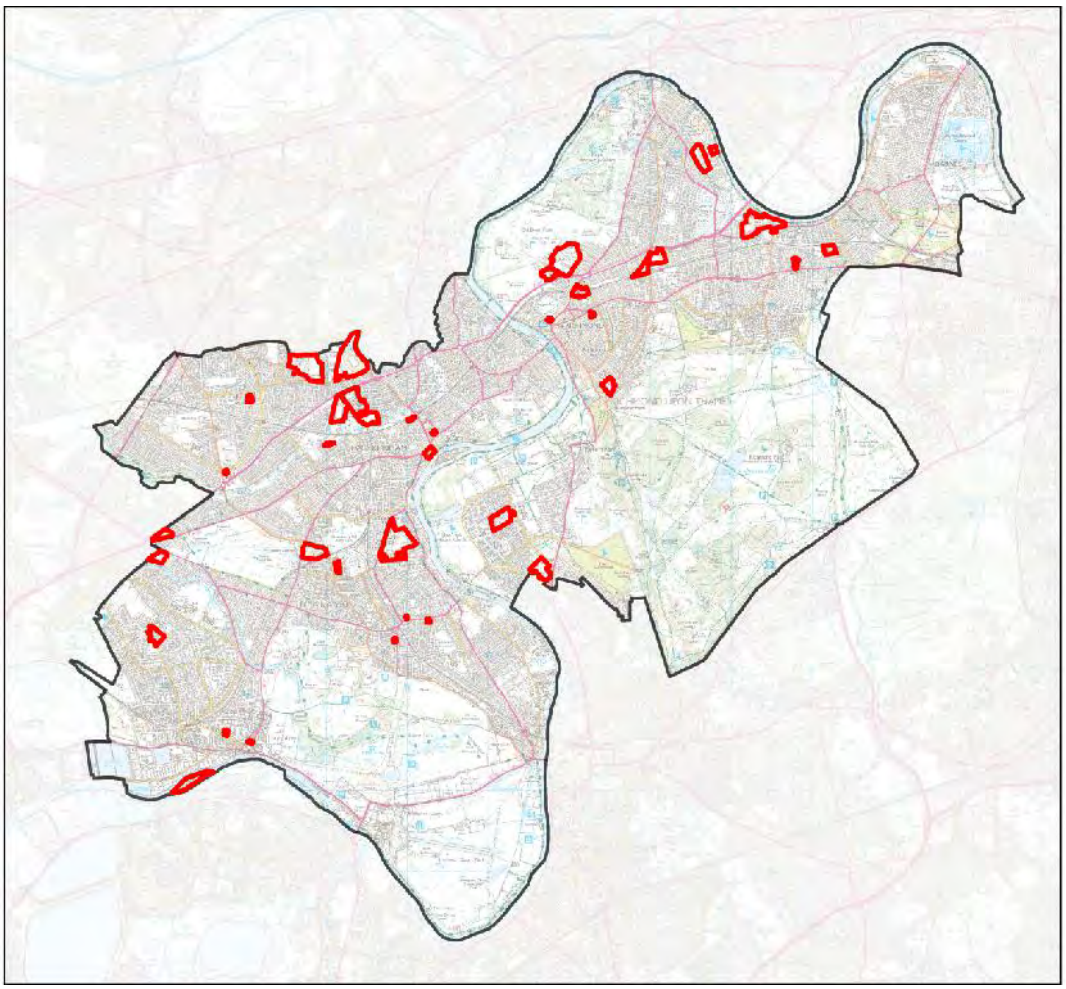


5.3 The following section provides a strategy for each 'place' and further details where specific areas for change are identified. While every place in the borough is expected to see some change over the plan period, there are some specific sub-areas identified as the places where growth may be accommodated, as identified in the Local evidence base and through specific Site Allocations. The place-based strategies have been informed by the Ham & Petersham Neighbourhood Plan, Twickenham Area Action Plan and the Village Planning Guidance SPDs which each include a vision and objectives for each area; taking into account updates since publishing, including discussions raised in the series of local Community Conversations during 2021 that followed the Richmond Partnership Conference.

5.4 This section of the Plan does not repeat general policies and guidance that may be set out elsewhere in the Plan, for example thematic policies, responding to the climate change emergency or seeking to increase affordable housing which will apply across the borough; rather this section sets to distinguish at a local level the key differences and areas of change that have a spatial, land-use basis for including.

5.5 The Council has identified key sites that are considered to assist with the delivery of the spatial strategy of the Plan. This is of particular importance for ensuring there is sufficient land for future needs. Some of the sites represent longer-term opportunities for key sites due to their siting and size, where the Plan seeks to influence development should they come forward through planning. Needs will also be met through other sites coming forward. The relevant site allocations are included at the end of each place-based strategy.

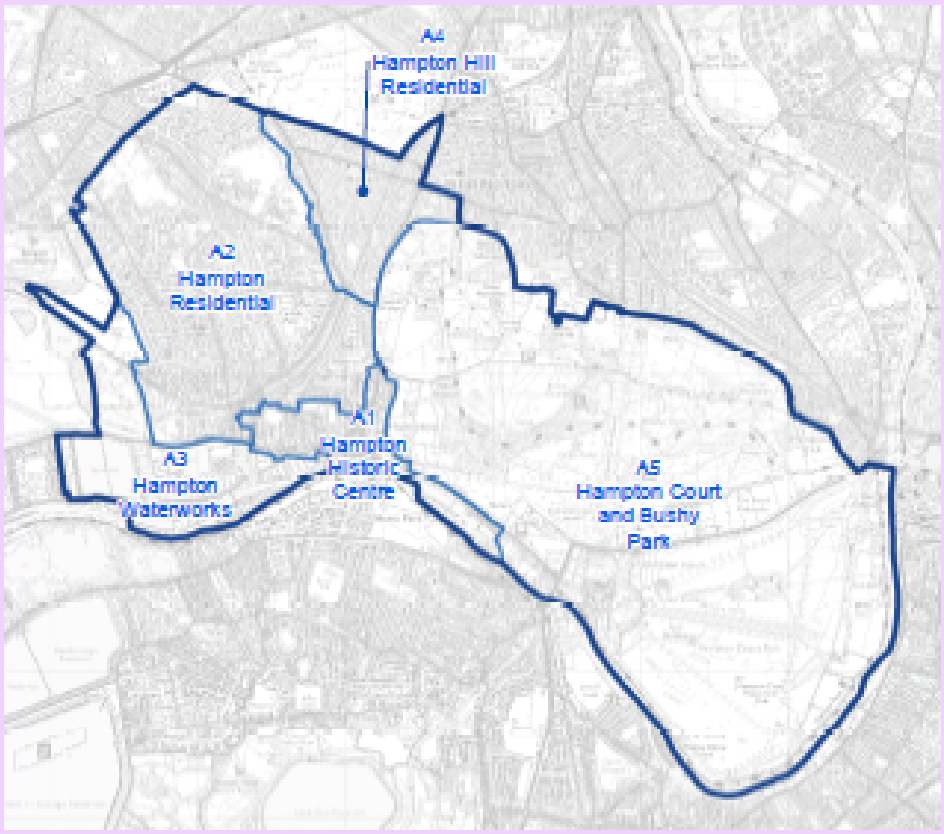
Map 5.2 Site Allocations



6 Place-based Strategy for Hampton & Hampton Hill

Policy PBS1 ***Place-based Strategy for Hampton & Hampton Hill***

Area Profile
The Hampton & Hampton Hill area encompasses Hampton Historic Centre, Hampton Waterworks, Hampton Court and Bushy Park, and the residential areas of Hampton and Hampton Hill. These are character areas A1, A2, A3, A4 and A5 in the Urban Design Study.



The setting of the area is largely defined by its river frontages with the Thames and the Longford, the open spaces of Bushy and Home Parks, which face recreational pressures but have protected status as an important habit for wildlife and a Site of Special Scientific Interest, and the nationally significant Hampton Court Palace and gardens. The area is a tourist destination for recreation and events such as the annual Hampton Court Flower Show and Palace Festival.

The area known as Hampton is made up of a number of diverse areas; the chief of these being the last major estate to be built, called the Nurserylands, and historic Old Hampton, part of which is referred to as Hampton Village.

The relationship with the River Thames is a valued feature, through preservation of views and alleyways, and contributing to a semi-rural character, although not always publicly accessible. There are three inhabited islands along this part of the river, with Platts Eyot the largest. Hampton Waterworks provide approximately 30% of London's mains water.

The residential areas have a suburban character. The busy local centre of Hampton Hill maintains its village character and has a concentration of small shops and services and a largely commercial function. Hampton Village is a larger local centre although it is dispersed. The local parade at Hampton Nursery Lands serves an area lacking in local retail facilities and serves an area that has been amongst the most relatively disadvantaged in the borough.

Parts of this area are considered poorly connected relative to other parts of the borough and suffers from the impact of through traffic on Hampton Hill High Street and Hampton Court Road.

As part of the Urban Design Study consultation in 2021 feedback was invited on what people valued in their area. Hampton Historic Centre (A1) was valued for its attractiveness, heritage, tranquil and calm places, and green and open spaces. For Hampton Residential (A2)

respondents scored its tranquil and calm places, green and open spaces, attractiveness, and shops and restaurants highly. Respondents for the Hampton Waterworks (A3) valued its green spaces, shops and restaurants, culture and entertainment, and attractiveness.

Overall strategy

Overall, the Urban Design Study recognises Hampton Historic Centre as having a high sensitivity to change, and extensive change is not appropriate. The historic built fabric, human-scale proportions, and proximity to the river and Bushy/Hampton Court Parks give a strong sense of place, and the strategy is therefore to conserve the historic character of the area. Hampton Residential (A2) has overall a medium sensitivity to change, as the Study recognises the suburban character should be enhanced, with the potential for positive change which is sympathetic to the area's valued features. Hampton Waterworks (A3) has a distinct sense of place and high sensitivity to change; extensive change is not appropriate, and the strategy is to conserve and enhance features where appropriate. Hampton Hill Residential (A4) has a high sensitivity to change, owing to the high townscape value across much of the area, the consistent building heights, suburban character and sense of green, and the strategy is to conserve and enhance. Hampton Court and Bushy Park (A5) has a high sensitivity to change, the existing character of the area is very strong and the strategy is therefore to conserve it, enhancing the resilience of particular features to future pressures. The Urban Design Study contains design guidance for each character area and for Richmond's Riverside.

Other initiatives

The Council works with Hampton Village Traders Association, who promote a positive approach to the high street, engaging residents and businesses, organising events and providing a business directory. The Council works with Hampton Hill Traders Association who promote "Love Hampton Hill".

Vision

The vision is to bring together the different areas of Hampton as a community, with facilities to meet local needs. The characteristic local urban scale and rural feel with its parks, green spaces and riverside, will be retained and there will be a more diverse range of shopping, an improved cultural offer and high quality local schools to reinforce Hampton as a vibrant community within the borough.
The vision for Hampton Hill is a thriving High Street and community facilities to meet local needs.

Policy

Future development in this place is expected, where relevant, to:

- **Enhance existing local centres and parades, encouraging more independent shops and businesses, to generate a sense of activity and vibrancy, and reanimate as local hubs. There is an opportunity to improve the pedestrian experience; to provide space for "spill-out" from restaurants, cafés and pubs in the commercial stretches of streets and on Hampton Hill High Street; temporary pedestrianisation of roads.**
- **Contribute to improving the public realm and implement more high-quality street furniture, including in Hampton Village and Hampton Hill.**

- **Incorporate focal points and a movement strategy across the area, while addressing the poor urban design elements of the existing estates in Hampton Residential. There is an opportunity to establish distinctive landmarks, without recourse to tall buildings, to improve legibility, focused along main roads and at key junctions.**
- **Contribute to opportunities to establish more green infrastructure, particularly street trees, by protecting, increasing and improving open spaces.**
- **Contribute to improving connectivity within the area, through wayfinding, signage and legibility, and the links to the riverside, preserving and enhancing public access to the Thames. Embrace the wider landscape setting along Thames to enhance the identity of the area and generate a more suburban/semi-rural feel, including to better establish/open views along the River at Hampton Waterworks.**
- **Consider opportunities to reduce the dominance of cars, including the severing effect of Staines Road East/Upper Sunbury Road.**

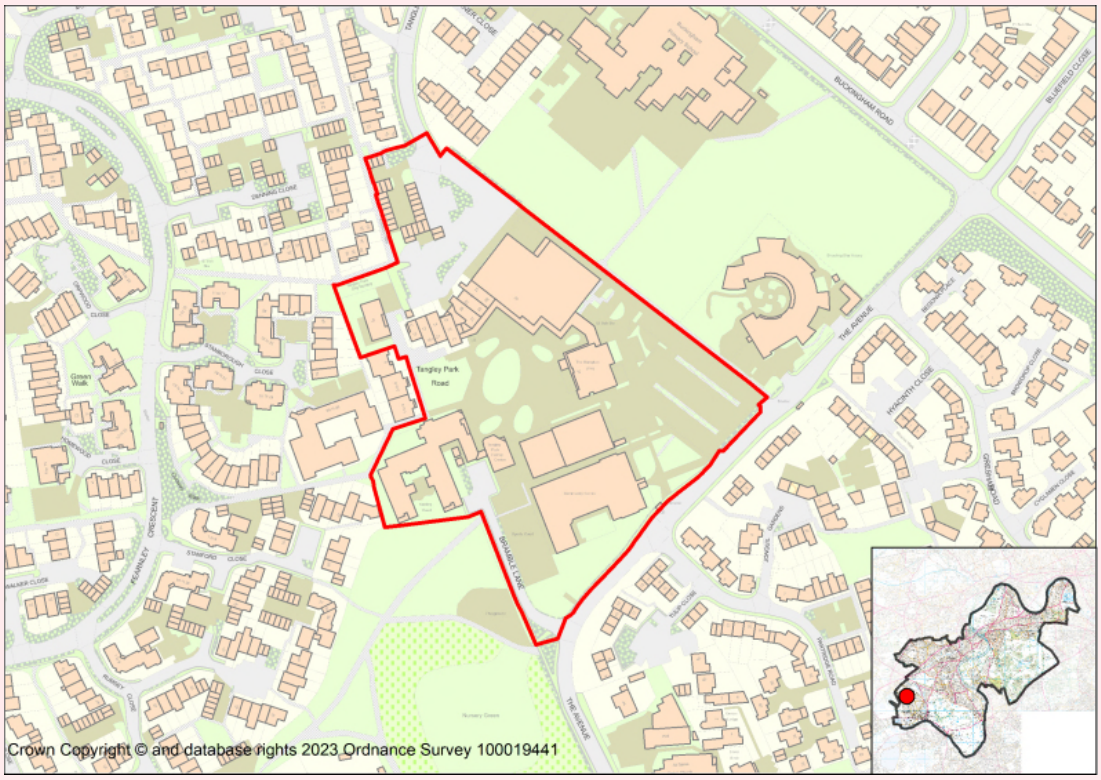
There are some development sites that if they are brought forward, or permissions implemented, may provide for redevelopment or new development. At Carpark for Sainsburys, Uxbridge Road, Hampton (Site Allocation 4) there is potential for affordable housing and restoration and enhancement of the river corridor.

See details in the Site Allocations within this area:

- Hampton Square, Hampton
- Platts Eyot, Hampton
- Hampton Traffic Unit, 60-68 Station Road, Hampton
- Carpark for Sainsburys, Uxbridge Road, Hampton
- Hampton Telephone Exchange (Molesey Telephone Exchange), 34 High Street, Hampton

Statement Site Allocation 1

Hampton Square, Hampton



CONTEXT: Proposed Site – Hampton Square, Hampton, TW12			
Ward	Hampton North	**Site Area**	2.85 ha
Land ownership	Mixed	**CIL Band**	Richmond CIL: Hampton - Low MCIL: Band 1
Existing land uses	Mix of uses including: Community uses (Use Classes E(f), F1 & F2) to include community hall, day nursery, youth centre, sports court and play space; Commercial uses (Use Class E(a)) to include Sainsbury's supermarket; Public House (sui generis); Residential to include houses (Use Class C3) and care home (C2); Public open space with water feature; Public car park; Substation.		
Local Plan Place-Based Strategy	Hampton & Hampton Hill	**Urban Design Study Area**	A2 Residential
Village Plan Guidance	Character Area 12 'Oak Avenue Estates', Hampton Village Planning Guidance SPD	**Neighbourhood Plan**	None
London Plan Designations	None specified.	**Type of Centre**	Hampton Nursery Lands (Important Local Parade)
Transport / Highways	- PTAL 1b/2 'poor' - Hampton Station approximate 18 minute walk - No Controlled Parking Zone	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Hampton Square, Hampton, TW12			
Flood Risk	- Flood Zone 1 - Area Susceptible to Groundwater Flooding (>= 25% <50% risk) - Small parts of site Area Susceptible to Surface Water Flooding (1 in 1000 risk)	**Trees**	None protected.
Views	None.		
Heritage Assets	None.	**Access to Open Space / Nature**	- Public and outdoor recreational space on site - Nursery Green Public Open Space (immediately adjacent)
Relevant Planning History	- 13-0301/FUL – Redevelopment of Hampton Square to create an enlarged area of public open space. Scheme includes new areas of hard and soft landscaping, water feature, tree planting and play elements – Granted 29/04/2013		
Description of Current Site Character	Hampton Square comprises a mix of commercial, community, social and residential uses. The site is predominately low rise comprising 1970s buildings two-storeys in height and interspersed with trees. The site includes a large public car park and there is also an outdoor open sports pitch on site and in the centre is a public open space with impressive illuminated water feature, seating and a range of community uses including a Sunday market. These works formed part of the £800,000 investment project from the Council in 2013, and Hampton Square now provides a modern and welcoming focal point for Hampton North. Aside from the internal public landscaping, the site is not currently pedestrian friendly and has a car-led design with regards its access.		
Neighbour Context	The surrounding area is predominantly residential comprising housing estates and terraced rows between one and two storeys in height. The site borders Nursery Green to the southwest which is Public Open Space and Other Open Land of Townscape Importance (OOLTI). Immediately to the northeast is Buckingham Junior School, whose grounds are also OOLTI.		

Vision: Proposed site - Hampton Square

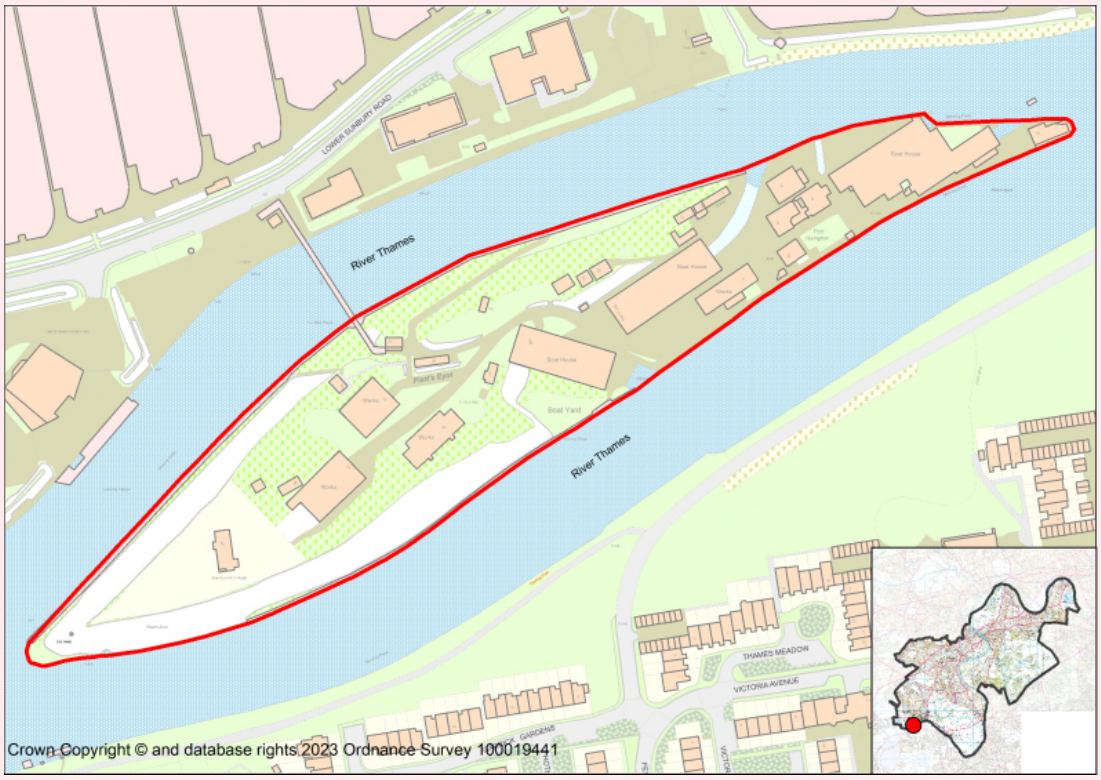
There is still a need for partial redevelopment and improvement of the related buildings to provide for community, retail, service, local business uses and residential uses, including affordable housing, which will complement the new Hampton Square.

- **Any redevelopment should ensure that it creates an attractive setting for the rejuvenated Square and contributes to creating an active and lively local centre.**
- **Any scheme should include pedestrian routes where possible, encourage active travel and retain car parking provision in line with London Plan standards, to meet the needs of the community centre and new uses.**
- **The site is directly adjacent to two areas of OOLTI. An overall increase in height would unlikely be supported and any redevelopment should ensure that it establishes a positive relationship with the adjoining green space, and where possible enhance its setting, having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 2

Platts Eyot*, Lower Sunbury Road*, Hampton*, TW12 2HF*



CONTEXT: Proposed Site – Platts Eyot, TW12 2HF			
Ward	Hampton	**Site Area**	3.77ha
Land ownership	Private	**CIL Band**	Richmond CIL: Hampton – Low MCIL: Band 1
Existing land uses	Business and employment uses including river-related and river-dependent operations, workshops (Use Class B2/B8), office (Class E(g)), ~~and~~ recording studios (Sui Generis) *and dwelling (C3)*; carpark		
Local Plan Place-Based Strategy	Hampton & Hampton Hill	**Urban Design Study Area**	A3 Hampton Waterworks
Village Plan Guidance	Character Area 7 & Conservation Area 61 'Platts Eyot', Hampton Village Planning Guidance SPD	**Neighbourhood Plan**	None.
London Plan Designations	- Thames Policy Area - Site of Metropolitan Importance for Nature Conservation	**Type of Centre**	None - out of centre

CONTEXT: Proposed Site – Platts Eyot, TW12 2HF			
Transport / Highways	- PTAL 0/1a 'worst/very poor' - Hampton Station approximate 21 minute walk - No Controlled Parking Zone - Access to island via footbridge at the north and ferry to the south	**Air Quality**	Air Quality Management Area
Flood Risk	- Zones 2 and 3a/b - Area Susceptible to Groundwater Flooding (>= 50% <75% risk) - Small parts of site Area Susceptible to Surface Water Flooding (1 in 1000 risk)	**Trees**	Significant number of trees subject to individual and group TPOs
Views	Platts Eyot Pedestrian Bridge Local View		
Heritage Assets	Platts Eyot Conservation Area CA58 Archaeological Priority *Area:* Zone - ~~(~~Thames Foreshore and Bank~~)~~ Listed Buildings: - Boat House No. 1, Boat House No. 2, Boat House No. 3 (Grade II) - Building No. 14 (Grade II) - Boat House No. 5 (Grade II) Buildings of Townscape Merit (BTMs): - Former Charging Station 19 Platts Eyot - Footbridge Assets on Historic England's 'At Risk' Register	**Access to Open Space / Nature**	- Area Poorly Provided with Public Open Space - Sits in in River Thames (Green Belt and Site of Importance for Nature Conservation [SINC])
Relevant Planning History	None.		
Description of Current Site Character	Platts Eyot is a River Thames islet whose industrial history dates back to the 19th century when the island was used for boatbuilding. The island remains in predominant industrial use today. Its riverbanks consist almost entirely of engineered structures, which are in need of repairs to protect the banks from erosion. The island is a designated Conservation Area and is occupied by a number of industrial buildings, some of which are either Grade II Listed or BTMs. Two other Grade II Listed boathouses were lost during a fire on the island in May 2021 and some remaining heritage assets, including the conservation area designation, are on Historic England's 'At Risk' register. The island is designated an area of Metropolitan Importance for Nature Conservation and the western side is Green Belt. The site has a past industrial land use.		

CONTEXT: Proposed Site – Platts Eyot, TW12 2HF	
Neighbour Context	The island lies south of the Hampton Waterworks complex, which comprise of Thames Water-owned waterbeds, north of which are large, impressive Grade II Listed Victorian Buildings (Karslake and Ruston & Ward Buildings) and the locally listed Waterworks Cottages set within the CA12 Hampton Conservation Area. The River Thames is Green Belt and Site of Importance for Nature Conservation (SINC). The site is within the Thames Policy Area. Inland south of the island the character is predominantly residential.

Vision: Proposed site - Platts Eyot

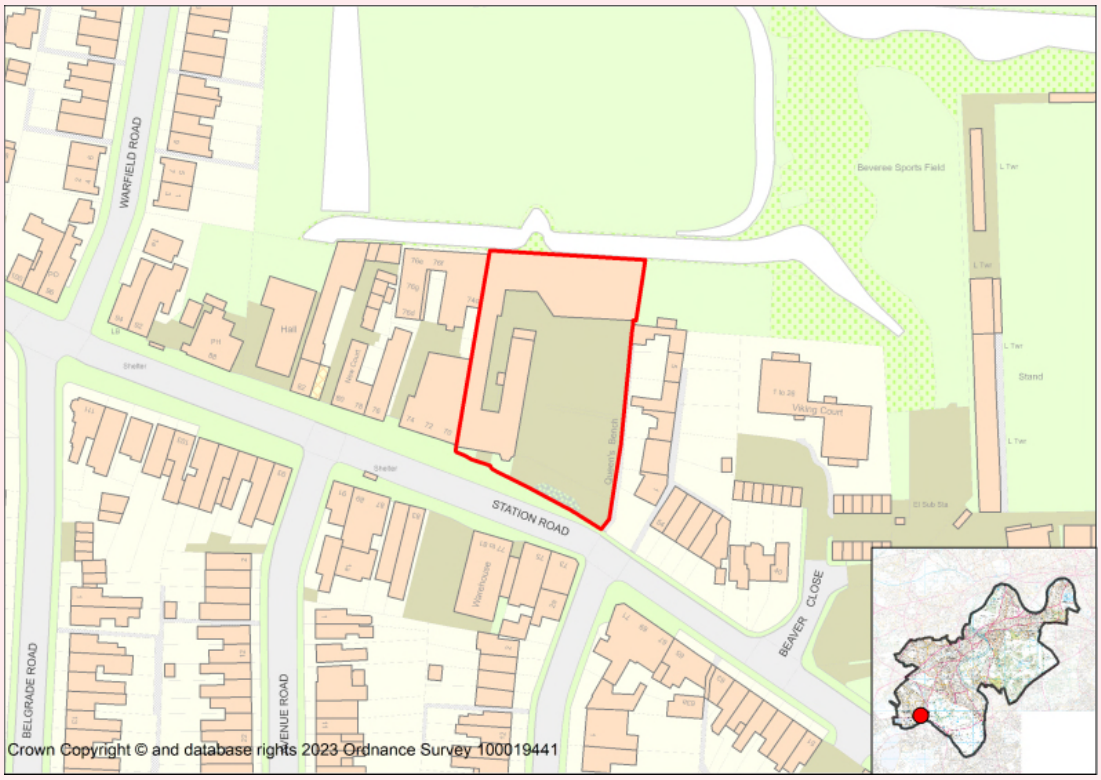
The Council is committed to working in partnership with the site owners and Historic England to develop a Masterplan or development brief for the island. Regeneration should maintain, and where possible enhance, existing river-dependent and river-related uses. New business and industrial uses that respect and contribute to the island's special and unique character are encouraged. Some residential development may be appropriate where it enables for the restoration of the listed buildings, especially those on the Heritage At Risk Register.

- **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. In areas of Green Belt, development will need to be appropriate as per the requirements of the NPPF.**
- **Development will be expected to ensure that designated heritage assets, and the wider character of the island, are improved and enhanced, including the appropriate restoration of listed buildings which were damaged in the 2021 fire. Any redevelopment should ensure that it establishes a positive relationship with the adjoining River Thames, having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD.**
- **It is acknowledged that some 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 uses relating to the river.**
- **Any scheme would need to ensure safe access to and egress from the island, to the Environment Agency's satisfaction, noting the existing restricted access and flood constraints. This challenge may limit the amount of residential development appropriate on the site. Very limited vehicular access may be appropriate, provided this does not adversely impact on the character and appearance of the island.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 3

Hampton Traffic Unit, 60-68 Station Road, Hampton



CONTEXT: Proposed Site – Hampton Traffic Unit, 60-68 Station, Hampton, TW12 2AX			
Ward	Hampton	**Site Area**	0.28 ha
Land ownership	Private	**CIL Band**	Richmond CIL: Hampton – Low MCIL: Band 1
Existing land uses	Former police station (Sui Generis)		
Local Plan Place-Based Strategy	Hampton & Hampton Hill	**Urban Design Study Area**	A1 Hampton Historic Centre
Village Plan Guidance	Character Area 4 & Conservation Area 12 'Hampton Village', Hampton Village Planning Guidance SPD	**Neighbourhood Plan**	None.
London Plan Designations	Brownfield Land Register	**Type of Centre**	Hampton Local Centre
Transport / Highways	- PTAL 2 'poor' - Hampton Station approximate 3 minute walk - No Controlled Parking Zone	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Hampton Traffic Unit, 60-68 Station, Hampton, TW12 2AX			
Flood Risk	- Flood Zone 1 - Area Susceptible to Groundwater Flooding (>= 50% risk)	**Trees**	Group of trees to north protected by virtue of the Conservation Area
Views	None		
Heritage Assets	CA12 Hampton Village Conservation Area Building of Townscape Merit (BTM) - 68 Station Road	**Access to Open Space / Nature**	- Beveree Playing Field (directly adjacent) – Other Open Land of Townscape Importance (OOLTI) and Site of Importance for Nature Conservation (SINC) and Hampton Football Club – Public Open Space - Hampton Village Green (156m west) - OOLTI and Public Open Space
Relevant Planning History	16/0606/FUL - Retention of former police station building with partial demolition of the rear wings of the police station and demolition of the rear garages and the construction of 28 residential units (4 x 1 bedroom, 12 x 2 bedroom, 10 x 3 bedroom and 2 x 4 bedroom) and associated access, servicing, cycle parking and landscaping – Permission Granted 05/09/2017 - This permission has not been implemented and has now expired. 19/2822/FUL - Retention and refurbishment of the former police station building with part demolition of rear wings and ancillary buildings, and the construction of a three storey side and rear extension and basement to form a registered care home comprising 22 care suites and 66 care bed units, with shared facilities, car and cycle parking, landscaping and ancillary works. - Resolution to grant permission by Planning Committee subject to S106 Agreement 19/04/2022		
Description of Current Site Character	The site comprises the former Metropolitan Police Station, ancillary buildings and garages to the rear and car park at the front. The former police station dates from 1905 and is a BTM, with the site also being within the Hampton Village Conservation Area. The main building is two storeys with floorspace in the roof and basement. The site fronts Station Road. The site was declared surplus to requirements by the Metropolitan Police in 2015 and is now in private ownership.		
Neighbour Context	To the west of the site is 70-74 Station Road which hosts a shopping parade with flats above within the three-storey building. There are also BTMs. To the rear of these shops is a courtyard area and further to the north is a two-storey workshop/showroom which has recently been granted planning permission for a new two-storey dwelling. The northern boundary of the site adjoins Beveree Sports Ground which is designated, OOLTI, SINC and Public Open Space. The site is separated by a group of trees. To the east the site adjoins a footpath which provides access to 1-6 Queens Bench Cottages, also BTMs, which are single-storey dwellings (except No. 6 which is part two-storey) which face the site. Adjacent is a terrace of three-storey houses fronting Station Road (Nos. 46-54) which are Grade II Listed Buildings. To the south of the site is Station Road and on the opposite side of the street are Nos. 73, 75 and 77-81 which are commercial units at ground floor and also BTMs.		

Vision: Proposed site - Hampton Traffic Unit

Appropriate uses for redevelopment include business, employment generating and other commercial or community and infrastructure uses. The Building of Townscape Merit should be retained and a pedestrian link should be provided through the site.

- **It is recognised that a planning application for 28 residential units was granted permission in 2017. There is a further application to redevelop the site to provide a residential care**

scheme which was granted resolution to approve planning permission subject to completion of a Section 106 Agreement by Planning Committee in April 2022.

- **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 infrastructures have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with policy-compliant levels of 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.**
- **Local Plan Policy 49 Social and Community Infrastructure proposes that should a scheme come forward for redevelopment or change of use to 100% genuinely affordable housing, in accordance with Policy 11 Affordable Housing, then it would not need to be considered for alternative social infrastructure use nor require the submission of marketing evidence. In those circumstances, a wholly affordable housing scheme would be supported.**
- **Development will be expected to retain the BTM and protect its setting, having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 4

Car Park for Sainsburys, Uxbridge Road, Hampton

CONTEXT: Proposed Site – Sainsbury's Car Park, Uxbridge Road, Hampton, TW12 1AW			
Ward	Hampton North	**Site Area**	1.99 ha
Land ownership	Private	**CIL Band**	Richmond CIL: Hampton – Low MCIL: Band 1
Existing land uses	Car park and petrol station associated with adjacent Sainsbury's store		
Local Plan Place-Based Strategy	Hampton & Hampton Hill	**Urban Design Study Area**	A2 Hampton Residential
Village Plan Guidance	Character Area 1 'Longford River Estates', Hampton Village Planning Guidance SPD	**Neighbourhood Plan**	None
London Plan Designations	Metropolitan Open Land (MOL)	**Type of Centre**	None - out of centre
Transport / Highways	- PTAL 2 'poor' - Fulwell Station approximate 25 minute walk - No Controlled Parking Zone	**Air Quality**	Air Quality Management Area
Flood Risk	- Flood Zone 1 - Area Susceptible to Surface Water Flooding (outer south	**Trees**	None

CONTEXT: Proposed Site – Sainsbury's Car Park, Uxbridge Road, Hampton, TW12 1AW			
	and western periphery) (1 in 100 and 1 in 1000 chance) - Area Susceptible to Groundwater Flooding (>= 75% risk)		
Views	None		
Heritage Assets	None	**Access to Open Space / Nature**	- Fulwell Public Golf Club (15m north) - Metropolitan Open Land (MOL) and Site of Importance for Nature Conservation (SINC) - Longford River (directly south) - MOL and SINC
Relevant Planning History	None		
Description of Current Site Character	Large car park with petrol garage associated with the Sainsbury's supermarket store to the east. The site is proposed for release from MOL following the Open Land Review 2021 which found this part (of Parcel 1: Longford E & Schools) performs weakly against all MOL designation criteria.		
Neighbour Context	The adjacent Sainsbury's foodstore to the east is well established and a key facility for the local community. Bus routes serving the store take a detour from Uxbridge Road into the site to a bus stop (Stop S 'Uxbridge Road/Hampton Sainsbury's) right outside the store to the north, before existing the site again and returning to Uxbridge Road. The edge of the car park immediately borders the Longford River corridor, which is MOL and a SINC, and forms part of an important 'landscape-scale' wildlife corridor connecting through the borough into adjacent green space networks. West of the site is the Longford River housing estate comprising blocks of flats up to four storeys in height and two-storey terraces. North of the site runs the busy A312 (Hampton Road East and Uxbridge Road) which connects to Great Chertsey Road and Twickenham Road to the west.		

Vision: Proposed site - Car Park for Sainsburys

If this site comes forward for development, there is a strong policy expectation that a future development scheme should deliver 100% on-site affordable housing. The restoration and enhancement of the Longford River wildlife corridor would be required.

- **The exceptional circumstances justifying the MOL release are set out under Local Plan Policy 11 to meet the identified affordable housing needs of local residents and therefore any future development scheme coming forward for this site should deliver 100% on-site affordable housing.**
- **Any new development would need to provide a minimum of ~~21~~10% measurable Biodiversity Net Gain (BNG) towards restoring and enhancing the ecological habitat quality of the Longford River wildlife corridor running along the southern edge of the site, in order to improve its function and connectivity, in accordance with the Richmond Biodiversity Action Plan.**
- **Any proposal will be required to provide new natural green space habitat creation expanding along the edge / on the bank top of the river watercourse (within the southern edge of the site) to help widen the width of the wildlife corridor to deliver the enhancements described above. There is a need for a comprehensive strategy to consider on-site natural green space.**
- **There is an expectation that any redevelopment provides new on-site Public Open Space in addition to any external amenity space requirements, delivering multi-functional benefits including for nature conservation and biodiversity value, improved permeability for**

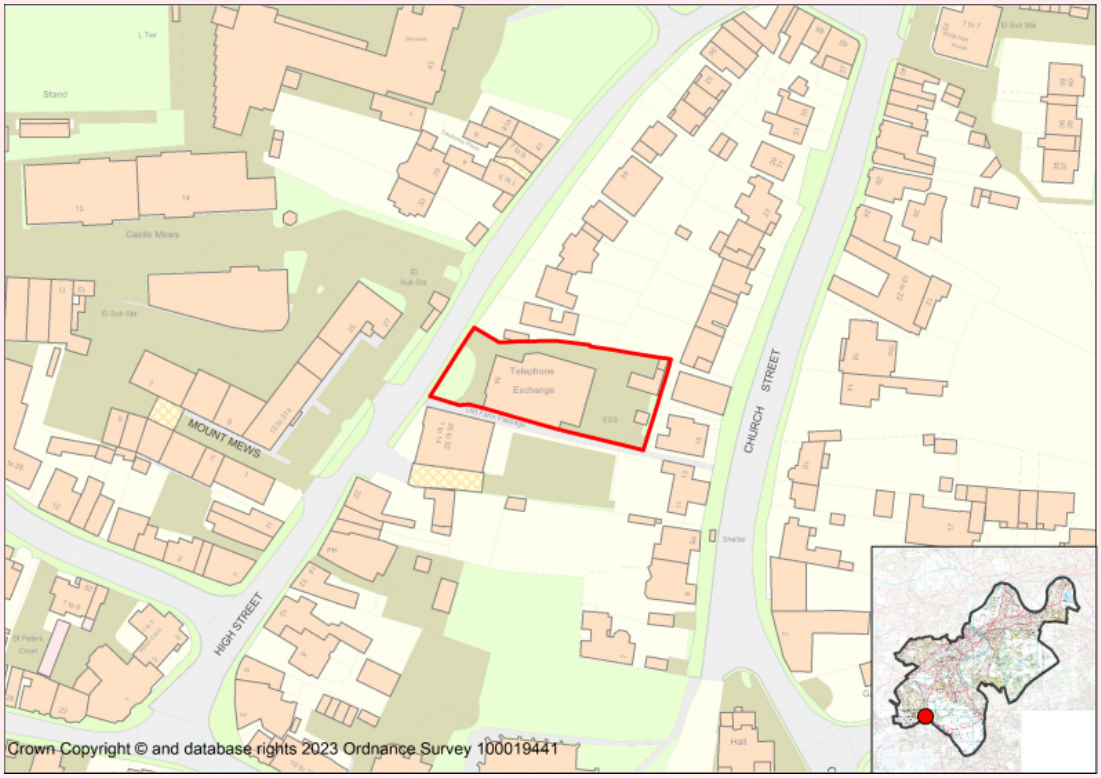
pedestrians and active travel, and for the health and wellbeing of future occupiers and users, including surrounding communities.

- **Parking provision ~~to London Plan standards~~ is expected to be provided including reprovision for the adjacent supermarket *in line with London Plan standards*. Bus Stop S serving the supermarket would need to be retained. The existing petrol filling station is expected to be retained or reprovided and sustainable refuelling options should be incorporated, such as rapid charging hubs and/or hydrogen.**
- **The height and design of development will be expected to protect the character and openness of adjacent MOL, having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 5

Hampton Telephone Exchange (Molesey Telephone Exchange, 34 High Street, Hampton, TW12 2SJ



CONTEXT: Proposed Site – Hampton Telephone Exchange (Molesey Telephone Exchange, 34 High Street, Hampton, TW12 2SJ			
Ward	Hampton	**Site Area**	0.13 ha
Land ownership	Private	**CIL Band**	Richmond CIL: Hampton – Low MCIL: Band 1
Existing land uses	Telephone exchange (sui generis) and associated office use		
Local Plan Place-Based Strategy	Hampton & Hampton Hill	**Urban Design Study Area**	A4 Hampton Hill Residential
Village Plan Guidance	Character Area 4 & Conservation Area 12 'Hampton Village', Hampton Village Planning Guidance	**Neighbourhood Plan**	None
London Plan Designations	None specified, but majority of site falls within area where intensification is encouraged on small sites with good public transport accessibility (PTAL 3-6) and on sites within 800m	**Type of Centre**	Local Centre - Hampton

CONTEXT: Proposed Site – Hampton Telephone Exchange (Molesey Telephone Exchange, 34 High Street, Hampton, TW12 2SJ			
	of a tube, rail station or Major or District town centre boundary (as defined in the London Plan).		
Transport / Highways	- PTAL 2 'poor' - Hampton Station approximate 10 minute walk - No Controlled Parking Zone	**Air Quality**	Air Quality Management Area
Flood Risk	- Flood Zone 1 - Area Susceptible to Groundwater Flooding (>= 25% <50% risk) - Northwestern tip of site Area Susceptible to Surface Water Flooding (1 in 1000 risk)	**Trees**	TPO Area Group (T0012, two Lime trees) on western border
Views	None.		
Heritage Assets	CA12 Hampton Village Conservation Area Archaeological Priority *Area:* Zone - Hampton Adjacent to the site: - Listed Buildings - 9-9a Church Street (Grade II) (east of site), Jolly Coopers pub 16 High Street (Grade II), 18 * 20, 22 High Street (Grade II), 33 Barham House & 35 Park House, High Street (Grade II) (west of site) - Buildings of Townscape Merit (BTMs) - 11-13, 15 & 17 Church Street (east of site), 37, 39 & 41 High Street (west of site)	**Access to Open Space / Nature**	- Beveree Playing Field (90m northwest of site) - Other Open Land of Townscape Importance (OOLTI) - Bell Hill Recreation Ground and Thames Hampton (140m south of site) - Metropolitan Open Land (MOL) and Public Open Space - Bushy Park (185m east of site) - MOL, Site of Important Nature Conservation (SINC), Site of Special Scientific Interest (SSSI)
Relevant Planning History	None. Since the 2000s, various permissions have been sought and approved for telecommunications equipment on the roof.		
Description of Current Site Character	Hampton Telephone Exchange, known as Molesey Telephone Exchange, is a three-storey stand-alone building with accommodation in the roof, fronting the east side of Hampton High Street. The building dates from the 1920s and has red facing brick with tiles mansard roof. It also benefits from 1970s part single-, part two-storey extensions to the rear. It was built as a replacement for the original telephone exchange located at Manor Road, Molesey, and has been in operation as such since. Since the 2000s the building's roof has been host to a range of telecommunications-related equipment operated by several operators. To the west of the of the site are two protected Lime trees. The remainder of the site is hardstanding and there are some outbuildings in the rear yard to the east.		
Neighbour Context	The surrounding area is predominantly residential to the north, east and immediately south of the site. The flank of Nos. 36 & 36A High Street, a two-storey dwelling, abound the site to the north. The rear gardens of Nos. 15 & 17 Church Street, two two-storey detached dwellings, abound the site to the east. No. 19 Church Street is a nursery. Old Farm Passage runs along the southern boundary of the site, a pedestrian snicket linking High Street and Church Street to the east. This separates the site from Kyle House, a three-storey purpose-built residential apartment complex. To the west and further south the area becomes more mixed, comprising of retail and commercial uses and the core of Hampton Hill Village centre. Twickenham Preparatory School at High Street is located 75m to the north.		

CONTEXT: Proposed Site – Hampton Telephone Exchange (Molesey Telephone Exchange, 34 High Street, Hampton, TW12 2SJ	
	The site is with the CA12 Hampton Village Conservation Area and there are a number of Listed Buildings and BTMs nearby.

Vision: Proposed site - Hampton Telephone Exchange

If the Telephone Exchange is declared surplus to requirements, the site has potential for conversion or redevelopment to provide a mix of uses to include employment, commercial or community uses and residential in upper floors and to the rear. Any development should explore provision of employment space, before a residential scheme would be considered, including policy compliant affordable housing.

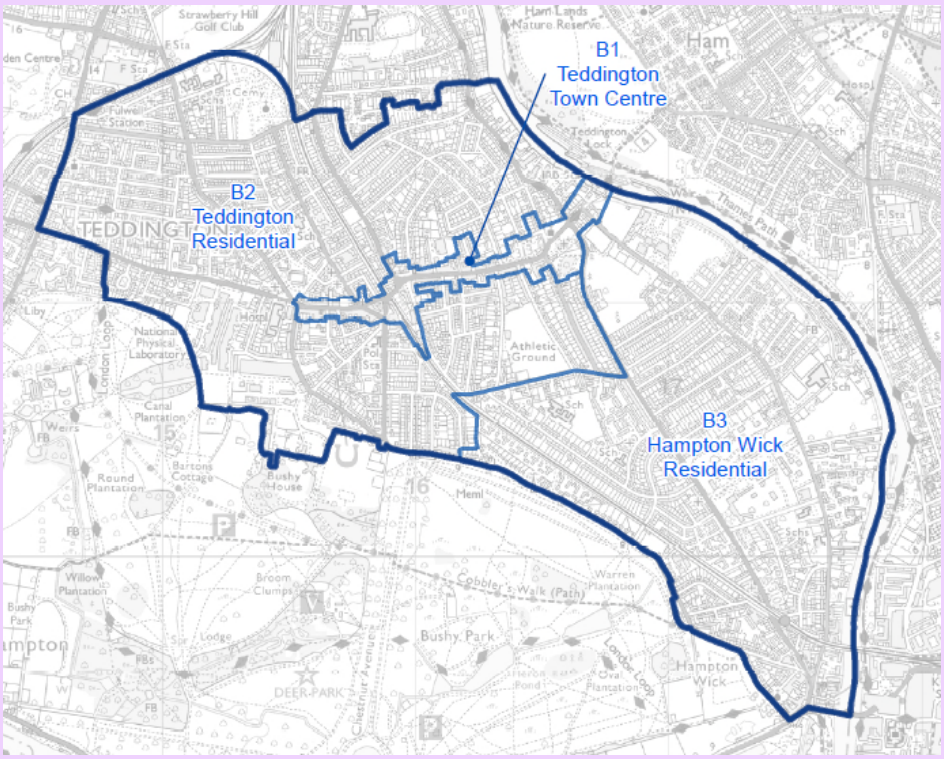
- **There is an expectation that redevelopment provides employment space in a Local Centre.**
- **Any redevelopment should create an active and attractive frontage on the High Street, ensuring the retention of the two protected trees.**
- **The site is in Hampton Village Conservation Area and the surrounding area is low-rise. An overall increase in height from the existing building would unlikely be supported. The density of the new development should be optimised in a way appropriate to this immediate context. Careful consideration of the roof treatment and overall design and materials would be required to ensure there is no harm to the Conservation Area, particularly in views from the High Street, having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD.**
- **Any redevelopment of the site would be expected to ensure that the amenities of neighbours are not unduly impacted with regards to loss of daylight and overlooking, particularly Kyle House, 36 & 36A High Street and 15 & 17 Church Street.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

7 Place-based Strategy for Teddington & Hampton Wick

Policy PBS2 Place-based Strategy for Teddington & Hampton Wick

Area Profile
The Teddington & Hampton Wick area encompasses Teddington Town Centre and the residential areas of Teddington and Hampton Wick. These are character areas B1, B2 and B3 in the Urban Design Study.



The place as a whole is defined by its setting of Bushy Park and Hampton Court to the south and the River Thames to the north and east, providing a special landscape setting, along with a good green infrastructure network of open spaces, although not all are publicly accessible. Udney Park Playing Fields has already been designated as a Local Green Space of particular importance to the local community.

Teddington Lock, constructed in 1811, is a distinctive landmark that incorporates a weir and suspension bridge, marking the end of the tidal reach of the Thames and providing pedestrian and cycle connectivity to Ham and Petersham. However, many parts of the riverfront are largely inaccessible.

Teddington is identified as a district centre in the borough's centre hierarchy and the London Plan (see section 6 of the Plan), showing demand for existing office functions, generally within smaller units, and with the area's night-time economy classed as of more than local significance (NT3). It provides a balance of multiple and independent shops and services and the vacancy rate in the past has been consistently low.

The area is home to significant assets in the science and life sciences sectors, including the National Physical Laboratory and LGC Ltd (previously known as the Laboratory of the Government Chemist) as well as a modern business park. The London Plan recognises its existing office functions, generally within smaller units, should be protected, albeit with low commercial growth potential.

The proximity of Teddington town centre and railway station provides good transport links into central London.

Outside of the town centre, Teddington is characterised primarily by Victorian and Edwardian terraced and semi-detached properties. The preservation of period architectural details gives uniformity to the historic elevations and a sense of quality to the townscape. To the northwest is a neighbourhood centre at Stanley Road providing local shops and services.

Hampton Wick Residential is located between Bushy Park, the River Thames, and Kingston in the neighbouring borough. Predominantly a residential area of quiet winding streets, many of which are conservation areas, there is also a distinctive historic core and neighbourhood centre. This provides a mix of shops and services in the south of the area by Kingston Bridge, bringing activity and vibrancy along the High Street. Hampton Wick railway station is on the same loop running through Teddington.

As part of the Urban Design Study consultation in 2021 feedback was invited on what people valued in their area. Character area B1 Teddington Town Centre scored consistently for all features, although particularly highly for shops and restaurants, vibrant healthy places, community spirit and attractiveness. For character area B2 Teddington Residential most features were scored highly, with attractiveness, tranquil and calm spaces, and shops and restaurants scoring highly. For character area B3 Hampton Wick Residential respondents scored highly for attractiveness, tranquil and calm places, green and open spaces, and shops and restaurants.

Overall strategy

Overall, the Urban Design Study recognises Teddington Town centre (B1) has a good sense of place and cohesiveness, and a high sensitivity to change owing to the high townscape value and consistency in scale and height of existing buildings. The strategy is to conserve and enhance the town centre's character and function. The Study recognises in Teddington Residential (B2) the uniform street patterns, consistent building quality, and prevalent green infrastructure contribution to the area's distinctive suburban character, with overall a high sensitivity to change; the strategy is to conserve the existing character. The existing character of Hampton Wick Residential (B3) is good, with areas of high-quality architecture and heritage value, and an overall high sensitivity to change. The strategy is to conserve and enhance the coherence and strength of character across the area, improving connection to the Thames and its wider setting.

Other initiatives

The Council works through the Teddington Society with the business community and Teddington Together (TT) to organise events such as the Christmas "Lights Up" event, to make Teddington a great place to work and live. The Council will support investigation of opportunities for a market in Teddington and to increase independent grocery stores. There is a directory of businesses operated by the Hampton Wick Association to showcase the wide range of shops and services, pubs and restaurants, trades and crafts people in Hampton Wick.

Vision

The vision for Teddington is that it will continue to be a community for residents, visitors and business which enjoys links to open spaces, the historic Royal Parks and the River Thames. The busy and safe district centre will provide a wide range of independent and other shops, employment, leisure, cultural, health and social facilities to support a range of community activities.

The vision for Hampton Wick is to retain its sense of identity and offer an attractive mix of retail and other facilities, making the most of its location close to the River Thames and expansive open spaces at Bushy and Home Parks, which face recreational pressures but have protected status as an important habit for wildlife and a Site of Special Scientific Interest.

There are limited opportunities for development, with some identified sites in the Teddington town centre that can play a role in providing for commercial and community uses along with new residential development.

Policy

Future development in this place is expected, where relevant, to:

- **Contribute to a sense of activity and vibrancy in the town and neighbourhood centres, retaining the mix of uses including restaurants, cafés, and pubs.**
- **Secure the provision of office floorspace and new flexible workspaces within the town centre and intensification of existing employment sites to provide for jobs and support local businesses.**
- **Enhance the public realm, to improve the sense of arrival at Teddington Station and create public areas for dwelling in Teddington town centre and implement more, high quality street furniture. Upgrade the public realm in Hampton Wick to reanimate it as a local hub.**
- **Support greening through enhancing street trees, planting and verges, in the town and neighbourhood centres and the residential areas, such as the opportunity to improve biodiversity in the gardens in front of Elmfield House.**
- **Protect, improve and increase open spaces, the connections between them and views to green spaces and the Thames Corridor.**
- **In areas deficient in access to Public Open Space, consider opportunities to improve access to existing spaces, either through design and public realm improvements, or where opportunities arise, provide new publicly accessible open space. Open spaces that are currently not publicly accessible, such as Udney Park Playing Fields, will be encouraged to make them available for public access and use.**
- **Ensure development along the riverside reflects the semi-rural character of the Thames Corridor and embraces the wider landscape setting to enhance the identity of the area. Contribute to valued leisure functions, including water uses, walking and cycling and enhancing continuity, connectivity and legibility of the Thames Path route, with public realm and active frontages along the riverside.**
- **Consider opportunities to reduce the dominance of cars and promote active travel, improving the permeability and creating space for pedestrians.**

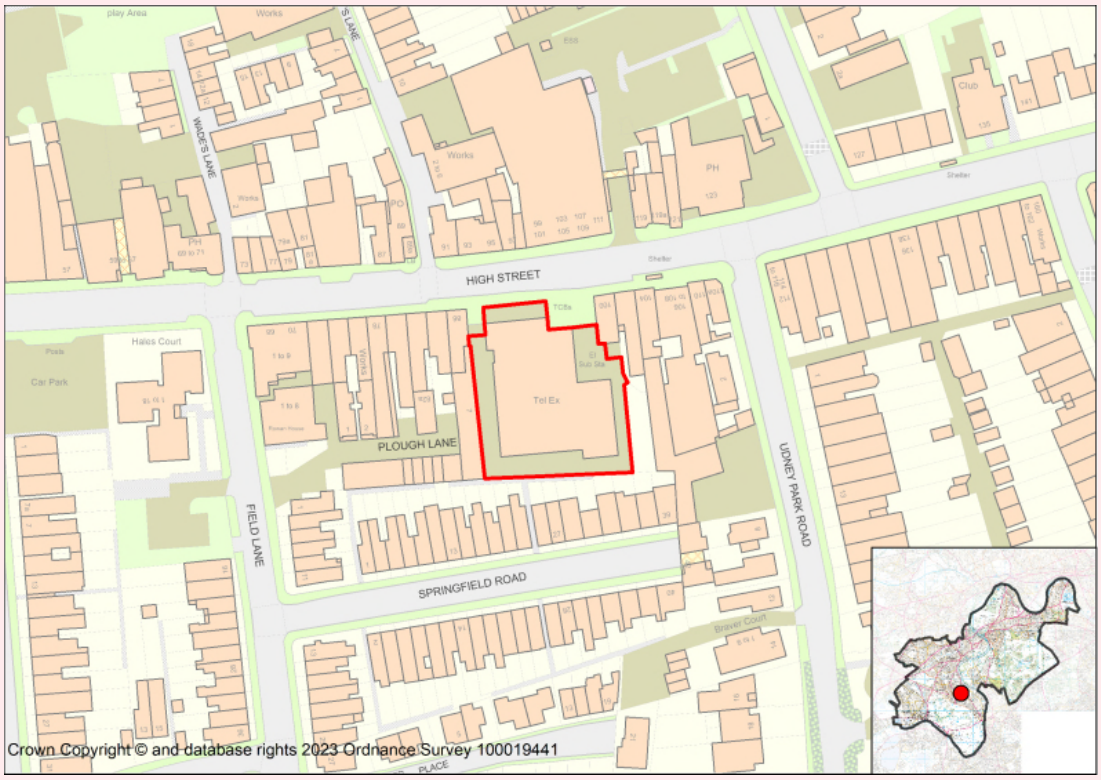
Within the town centre boundary, there is potential for new development at key corner plots and around the station if sites come forward, including at Teddington Telephone Exchange (Site Allocation 6), Teddington Delivery Office (Site Allocation 7), and Fulwell Bus Garage (Site Allocation 19). There are opportunities to provide for social and community infrastructure, and enhance the local retail and employment offers which contribute to enabling the town centre grow and diversify, as well as provide new housing. There is an identified opportunity for mid-rise buildings in the area along the railway line north of Teddington Station, across the junction of Station Road/High Street in accordance with Policy 45 Tall and Mid-Rise Building Zones. Outside of the town centre, at the Strathmore Centre (Site Allocation 8) redevelopment for a replacement nursery and affordable housing is expected to be implemented.

See details in the Site Allocations within this area:

- Telephone Exchange, Teddington
- Teddington Delivery Office, Teddington
- Strathmore Centre, Strathmore Road, Teddington
- Teddington Police Station, Park Road, Teddington

Statement Site Allocation 6

Telephone Exchange, Teddington



CONTEXT: Proposed Site – Telephone Exchange, High Street, Teddington			
Ward	Teddington	**Site Area**	0.17 ha
Land ownership	Private	**CIL Band**	Richmond CIL: Teddington – Low MCIL: Band 1
Existing land uses	Telephone exchange (sui generis) and associated office use		
Local Plan Place-Based Strategy	Teddington & Hampton Wick	**Urban Design Study Area**	B1 Teddington Town Centre
Village Plan Guidance	Character Area 5 & Conservation Area 37 'High Street Teddington', Hampton Wick & Teddington Village Planning Guidance SPD	**Neighbourhood Plan**	None
London Plan Designations	Brownfield Land Register Majority of site falls within area where intensification is encouraged on small sites with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail station or Major or District town	**Type of Centre**	Teddington Town Centre Boundary Primary Shopping Area

CONTEXT: Proposed Site – Telephone Exchange, High Street, Teddington			
	centre boundary (as defined in the London Plan).		
Transport / Highways	- PTAL 3 'moderate' - Teddington Station approximate 8 minute walk - Controlled Parking Zone T - Teddington	**Air Quality**	Air Quality Management Area
Flood Risk	- Flood Zone 1 - Critical Drainage Area - Area Susceptible to Groundwater Flooding (>= 50%<75% risk)	**Trees**	None protected
Views	None		
Heritage Assets	CA37 High Street Teddington Conservation Area Adjacent to site: • Listed Buildings - 93-95 High Street (Grade II Listed) (north of site), 83-85, 79, 79A, 81, 81A High Street (Grade II Listed) (northeast of site) • Buildings of Townscape Merit (BTMs) - 100-110A, 106-108 High Street (directly east), 72-86 High Street (directly west), 87, 91, 97, 103-105 High Street (north of site)	**Access to Open Space / Nature**	• Small grassed area to front of site • Teddington Pool Playground & Wades Lane Public Grounds (110m northwest) - Other Open Land of Townscape Importance (OOLTI) and Public Open Space • St Marys Hospital Sports Ground & Udney Park Playing Fields (130m southeast) - OOLTI and Local Green Space
Relevant Planning History	None.		
Description of Current Site Character	Teddington Telephone Exchange is a part two- part three-storey building with flat roof and adjoining substation fronting the south side of the High Street. The site is hardstanding with access via the High Street and some on-site car parking. The entire site is within the High Street Teddington Conservation Area.		
Neighbour Context	Parts of Teddington High Street are defined as a Primary Shopping Area. Grand three-storey Edwardian shopping parades survive on the south side adjacent either side of the site, which are BTMs. Many other nearby buildings are BTMs and some are Grade II Listed, including the 18th-century Elmfield House (Nos. 79-85). It has a traditional high street character of mainly specialist shopping, retaining a high number of original shopfronts and single-storey shop units built on the frontage of older houses. South of the site are the rear gardens of two-storey terraces fronting Springfield Road. West of the site is Plough Lane, a short cul-de-sac containing some new build residential dwellings two storeys in height.		

Vision: Proposed site - Teddington Telephone Exchange, Teddington

If the Telephone Exchange is declared surplus to requirements, appropriate land uses include commercial / retail on the ground floor, especially in the Primary Shopping Area facing the High Street. Any proposal should provide for employment floorspace, such as offices or other commercial uses. A mixed-use scheme with housing (including affordable housing) in upper floors and the rear of the site could be considered.

- **There is an expectation that redevelopment provides employment space in this ~~Area of in this~~ town centre *boundary location*. The Richmond upon Thames Retail & Leisure Study Phase 2 forecasts a surplus of retail *(comparison and convenience)* floorspace (728 sqm) and a requirement for 839 sqm of food/beverage floorspace by 2034, amounting to a small total requirement *(retail and food/beverage)* of c. 100sqm (gross) uses for Teddington to 2034. *An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study which supersedes earlier forecasting. It suggests that in Teddington there will be a surplus of retail (comparison and convenience) floorspace of 660 sqm and a requirement for 860 sqm of food/beverage floorspace by 2034, resulting in an overall requirement (retail and food/beverage) of only c 200 sqm (gross).* Any commercial / retail floorspace should enable the centre to grow and diversify in a way that responds to changes in the retail and leisure industries, providing commercial, business and service uses to serve the local community.**
- **Only if other commercial or employment generating uses have been explored and options discounted in line with other policies on this Plan, would the provision of housing, including a policy-compliant level of 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.**
- **Any redevelopment should create an active and attractive frontage on the High Street, including retaining the open greened area fronting the High Street, which is important for biodiversity and visual relief.**
- **The site is in a Conservation Area and there are a significant number of BTMs and some Grade II Listed Buildings nearby. The design of any redevelopment proposal will need to respect the character and settings of heritage assets and BTMs, having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 7

Teddington Delivery Office, Teddington

CONTEXT: Proposed Site – Teddington Delivery Office, 19 High Street, Teddington			
Ward	Teddington	**Site Area**	0.06ha
Land ownership	Private	**CIL Band**	Richmond CIL: Teddington – Low MCIL: Band 1
Existing land uses	Royal Mail sorting office (Use Class Sui Generis)		
Local Plan Place-Based Strategy	Teddington & Hampton Wick	**Urban Design Study Area**	B1 Teddington Town Centre
Village Plan Guidance	Character Area 5 & Conservation Area 37 'High Street Teddington', Hampton Wick & Teddington Village Planning Guidance SPD	**Neighbourhood Plan**	None
London Plan Designations	Brownfield Land Register	**Type of Centre**	Teddington Town Centre Boundary
Transport / Highways	- PTAL 3 'moderate' - Teddington Station approximate 6 minute walk - Controlled Parking Zone T - Teddington	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Teddington Delivery Office, 19 High Street, Teddington			
Flood Risk	- Flood Zone 1 - Critical Drainage Area - Area Susceptible to Groundwater Flooding (>= 75% risk)	**Trees**	None on site. Significant pavement trees along western and southern boundary protected via conservation area.
Views	None		
Heritage Assets	CA37 High Street Teddington Conservation Area Building of Townscape Merit (BTM) - Delivery Office, 19 High Street Archaeological Priority *Area:* Zone - Teddington Adjacent to the site • Listed Building - 23 High Street (former Lloyds Bank) (east of site) • BTM - 6-40 High Street (opposite, south)	**Access to Open Space / Nature**	• Elmfield House (11m west) - Other Open Land of Townscape Importance (OOLTI) and Public Open Space • Jubilee Gardens (50m southwest) - OOLTI
Relevant Planning History	None.		
Description of Current Site Character	No. 19 High Street is an attractive red brick part two- part single-storey BTM, originally built as a Royal Mail sorting office. Access to the building is via the High Street with vehicular access to a small servicing yard to the rear via Elmfield Avenue. The entire site is within the High Street Teddington Conservation Area.		
Neighbour Context	The application site forms part of the Teddington High Street Primary Shopping Area designation. Here the quality of the character of the High Street diminishes slightly compared to the east, with greater numbers of modern buildings, though there remains a high number of BTMs including the entire row opposite, and also the Grade II Listed former Lloyds Bank to the east. Prevailing heights are two to three storeys though the commercial tower block, Harlequin House sits opposite the site to the west at six to seven storeys. Elmfield Avenue is a tree-lined residential street comprising of two-storey semi-detached dwellings. North of the site is No. 4, separated by the site via a pedestrian accessway to No. 2 to the east, which comprises a mews of 7 studio flats converted from light industrial. Along the southern and western boundary of the site are street trees which provide significant townscape value.		

Vision: Proposed site - 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 Primary Shopping Area facing the High Street. Any proposal should provide for employment floorspace, such as offices or other commercial uses. A mixed-use scheme with housing (including affordable housing) in upper floors and the rear of the site could be considered.

- **As of 2022, Royal Mail has no plans to relocate operations from this delivery office. However, if the site is declared surplus to requirements by Royal Mail in the longer term, there is an expectation that redevelopment would provide employment space in this town centre, such as offices or other commercial uses, which could be in the form of flexible shared workspaces.**
- **The Richmond upon Thames Retail and Leisure Study (Phase 2) forecasts a surplus of retail *(comparison and convenience)* floorspace (728 sqm) and a requirement for 839 sqm of**

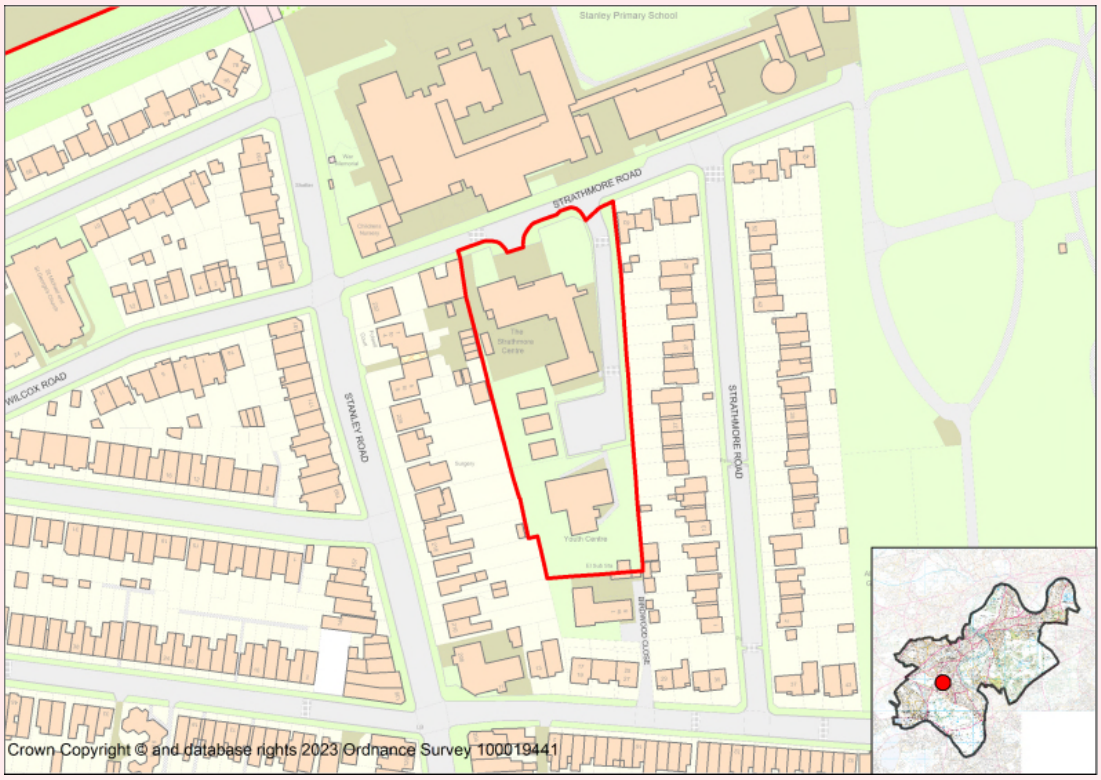
food/beverage floorspace by 2034, amounting to a small total requirement *(retail and food/beverage)* of c. 100sqm (gross) uses for Teddington to 2034. *An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study which supersedes earlier forecasting. It suggests that in Teddington there will be a surplus of retail (comparison and convenience) floorspace of 660 sqm and a requirement for 860 sqm of food/beverage floorspace by 2034, resulting in an overall requirement (retail and food/beverage) of only c 200 sqm (gross).* Any commercial / retail floorspace should enable the centre to grow and diversify in a way that responds to changes in the retail and leisure industries, providing commercial, business and service uses to serve the local community.

- **Only if other commercial or employment generating uses have been explored and options discounted in line with other policies on this Plan, would the provision of housing, including a policy-compliant level of 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.**
- **Any redevelopment should create an active and attractive frontage on the High Street, taking account of the BTM designation and subject to feasibility and viability of altering the elevations.**
- **The site is in a Conservation Area and there are a significant number of BTMs and some Grade II Listed Buildings nearby. The design of any redevelopment proposal will need to respect the character and settings of heritage assets and BTMs, having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD. The architectural and historical interest of the site BTM will need to be protected.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 8

Strathmore Centre, Strathmore Road, Teddington, TW11 8UH



CONTEXT: Proposed Site – Strathmore Centre, Strathmore Road, Teddington			
Ward	Fulwell & Hampton Hill	**Site Area**	0.63ha
Land ownership	Public	**CIL Band**	Richmond CIL: Teddington – Low MCIL: Band 1
Existing land uses	Child-care services / social infrastructure use (Use Class E(f)) and former youth offending centre (Use Class C2A)		
Local Plan Place-Based Strategy	Teddington & Hampton Wick	**Urban Design Study Area**	B2 Teddington Residential
Village Plan Guidance	Character Area 1 'Stanley North', Hampton Wick & Teddington Village Planning Guidance SPD	**Neighbourhood Plan**	None
London Plan Designations	Brownfield Land Register Site falls within area where intensification is encouraged on small sites with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail station or Major	**Type of Centre**	None – out of centre

CONTEXT: Proposed Site – Strathmore Centre, Strathmore Road, Teddington			
	or District town centre boundary (as defined in the London Plan).		
Transport / Highways	- PTAL 2 'low' - Fulwell Station approximate 5 minute walk - Controlled Parking Zone T - Teddington	**Air Quality**	Air Quality Management Area
Flood Risk	- Flood Zone 1 - Critical Drainage Area - Area Susceptible to Groundwater Flooding (>= 75% risk)	**Trees**	None protected Area Proposed for Tree Planting
Views	None		
Heritage Assets	None	**Access to Open Space / Nature**	• Poorly Provided with Public Open Space • Teddington Cemetery (75m east) - Other Open Land of Townscape Importance (OOLTI) and Site of Importance for Nature Conservation (SINC)
Relevant Planning History	• 20/0539/FUL - Demolition of all existing buildings; erection of two 3-storey buildings comprising 30 residential dwellings in total (6 x1 bedroom, 17 x 2 bedroom & 7 x 3 bedroom); erection of single storey nursery building (294 sqm in total) alterations to existing access road and formation of 36 no. car parking spaces at grade; landscaping including communal amenity space and ecological enhancement area; secure cycle and refuse storage structures. - Granted 04/04/2022		
Description of Current Site Character	The site contains several standalone buildings, with well-established landscaping and border trees within the grounds. The two-storey Strathmore Centre to the north of the site was formerly a youth offending centre and is currently unused. To the south of the site is the single-storey Scamps Nursery. An access road extends into the site from Strathmore Road which is traffic calmed with wide adjacent pavement. Strathmore Road is accessed off Stanley Road.		
Neighbour Context	The surrounding area is predominantly residential with Nos. 9-63 Strathmore Road bordering the eastern boundary of the site, flats at 1-8 Birdwood Close adjoining the southern boundary and No. 214-232 Stanley Road and 67-69 adjoining the western boundary. Stanley Road Primary School is sited to opposite to the north on Strathmore Road. St James's Primary School is a 6 minute walk north up Stanley Road.		

Vision: Proposed site - Strathmore Centre, Teddington

Social and community infrastructure uses and/or an affordable housing scheme with on-site car-parking are the most appropriate land uses for this site.

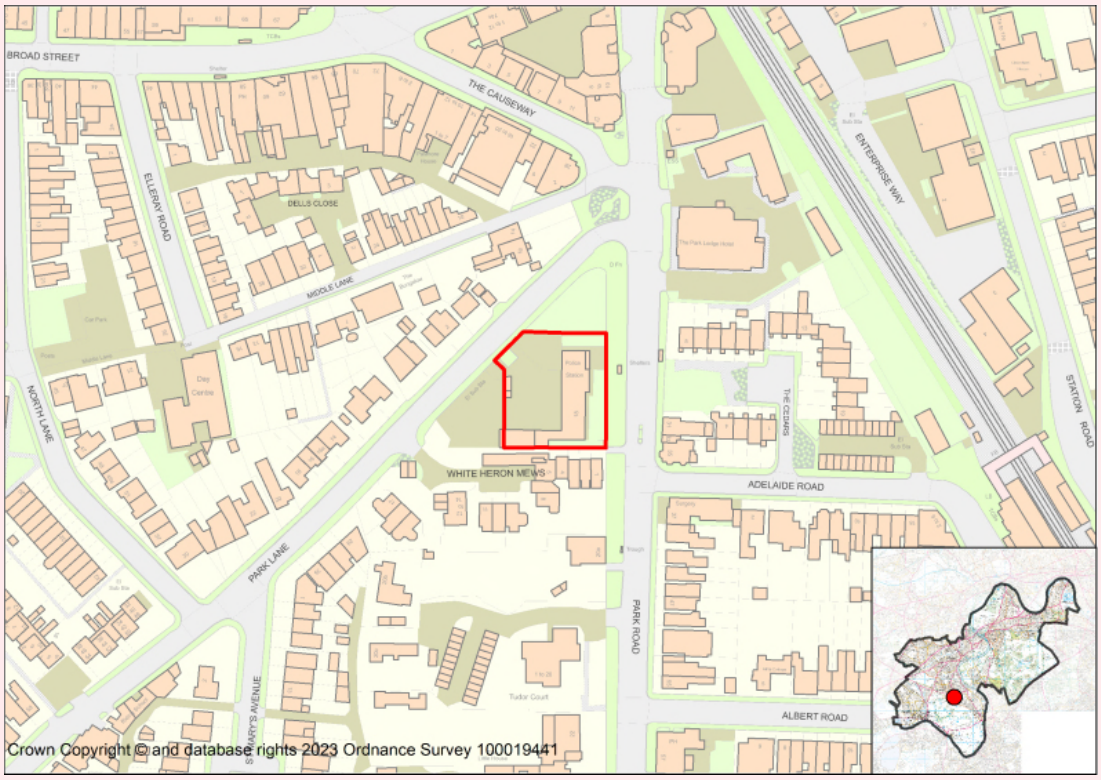
- **There is an increasing need for the provision for childcare facilities and nurseries in the borough. The site's location in a primarily residential area and proximity to Stanley School and St James' School make it an ideal for a nursery and other child-care services use.**
- **Proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way, including the provision of appropriate outdoor space and parking related to the childcare services, or elsewhere in a convenient alternative location accessible to the current community it supports.**

- **Only if alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would an affordable housing scheme with on-site car-parking be considered as a potential redevelopment option.**
- **Local Plan Policy 49. Social and Community Infrastructure Use proposes that should a scheme come forward for redevelopment or change of use to 100% genuinely affordable housing, in accordance with Policy 11. Affordable Housing in terms of mix, tenure and affordability, then it would not need to be considered for alternative social infrastructure use or require the submission of marketing evidence. However, on this site the Council is seeking the reprovision of the nursery along with affordable housing, owing to the need to re-provide the existing use as set out above.**
- **It is acknowledged that an application of the site for the reprovision of a nursery and construction of 30 dwellings (100% affordable) was granted planning permission in April 2022.**
- **The design of any redevelopment proposal will need to respect the character of the area, having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 9

Teddington Police Station, Park Road, Teddington



CONTEXT: Proposed Site – Teddington Police Station, Park Road, Teddington, TW11 0AB			
Ward	Teddington	**Site Area**	0.16ha
Land ownership	Public	**CIL Band**	Richmond CIL: Teddington – Low MCIL: Band 1
Existing land uses	Former police station (Sui Generis)		
Local Plan Place-Based Strategy	Teddington & Hampton Wick	**Urban Design Study Area**	A2 Teddington Residential
Village Plan Guidance	Character Area 14 'Hampton Village', Teddington & Hampton Wick Village Planning Guidance SPD	**Neighbourhood Plan**	None
London Plan Designations	None specified.	**Type of Centre**	Teddington ~~Main~~ *Town* Centre Boundary
Transport / Highways	- PTAL 3 'moderate' - Teddington Station approximate 3 minute walk - CPZ: T - Teddington	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Teddington Police Station, Park Road, Teddington, TW11 0AB			
Flood Risk	- Flood Zone 1 - Critical Drainage Area - Area susceptible to Surface Water Flooding (southwestern corner of site) (1 in 1000 risk) - Area Susceptible to Groundwater Flooding (>= 75% risk)	**Trees**	• T2 and T11 (TPO) (Southwestern point of site) • All trees on site protected by virtue of the Conservation Area • T10 outside site on southwestern border (TPO)
Views	None.		
Heritage Assets	CA22 Park Road Teddington Conservation Area Archaeological Priority *Area:* Zone - Teddington Building of Townscape Merit (BTM) - Boundary wall to Police Station Adjacent to site: • Listed Buildings - 14 & 16 Park Road (Grade II Listed) (northwest of site), The Park Public House (former Clarence Hotel), Park Road (Grade II Listed) (northeast of site) • Buildings of Townscape Merit (BTMs) - The Cedars Estate (east of site), numerous Park Road properties (southeast of site)	**Access to Open Space / Nature**	• Land at Park Road (directly adjacent north) – Other Open Land of Townscape Importance (OOLTI)
Relevant Planning History	None		
Description of Current Site Character	The former police station is a 1960s-style part three- part four-storey flat-roofed building fronting Park Road including single-storey attached garages and standalone substation. Much of the enclosing boundary wall is locally listed (BTM). The grounds comprise some soft landscaping and two protected trees, with vehicular access being from Park Lane to a service yard on site. To the rear there are large brick walls and a metal fence which provided security to the police station but which otherwise creates an inactive frontage. The building no longer operates as a police station and has been declared surplus to requirements by the Metropolitan Police. The building is vacant pending its marketing for sale. The site is in the CA22 Park Road Teddington Conservation Area.		
Neighbour Context	The immediate surrounding area is predominantly residential two-storeys in height though there are also some small shops on Park Road and Grade II Listed The Park public house. The majority of the Georgian two-storey dwellings front Park Road to the southeast are BTMs, as are the two-storey 1970s dwellings comprising the Cedars estate to the east. Further north towards the roundabout building heights become higher where there are purpose-built flats and office blocks up to four and five storeys high, with some commercial at ground floor. The site is bounded by Park Lane to the west, the A309 Park Road to the east and White Heron Mews to the south which comprises two-storey terraces. Outside of the site allocation is a substation adjoining the site to the west and a triangle of green space designated OOLTI to the north at the junction of Park Lane and Park Road.		

Vision: Proposed site - Teddington Police Station

The site presents an opportunity for comprehensive redevelopment. Community/social infrastructure-led mixed-use scheme with an element of residential are appropriate uses for redevelopment of this site. The residential element should provide a policy-compliant level of affordable housing.

- **Proposed redevelopment of the site will only be acceptable if a community/social infrastructure use is reprovided on site at ground-floor level, such as for a medical/health use. Residential use will be acceptable on the upper floors, subject to the development providing policy-compliant levels of affordable housing (in line with public sector land disposal). Grant funding opportunities should be explored to maximise the level of affordable housing over and over the policy requirement.**
- **The site is within Teddington Town Centre but does not form part of the ~~key~~ *Primary ~~s~~S*hopping ~~a~~*A*rea. Retail is not considered appropriate in this location as it would detract from the main shopping area. Proposals should reflect the site's town centre location and look to complement the vitality and viability of the centre.**
- **Local Plan 49 Social and Community Infrastructure proposes that should a scheme come forward for redevelopment or change of use to 100% genuinely affordable housing, in accordance with Policy 11 Affordable Housing in terms of mix, tenure and affordability, then it would not need to be considered for alternative social infrastructure use nor evidence of marketing submitted. In those circumstances, a wholly affordable housing scheme would be supported. However, on this site the Council is seeking social infrastructure use and affordable housing, due to its prominent town centre location and local needs.**
- **Development should ensure an attractive frontage along Park Road which retains and has regard to the BTM designated boundary wall. There is an opportunity to improve the design of the area including the inactive frontage at the rear and unattractive high walls and security metal fencing. The rear boundary treatment should be softened and designed to improve the streetscene along Park Lane.**
- **Development will be expected to protect and enhance the Conservation Area and the setting of nearby heritage assets, including BTMs, having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD.**
- **The OOLTI to the north will need to be retained and its character and openness protected and enhanced. The green space would benefit from being opened for public use with seating and planting. Development would need to ensure the retention of protected trees, including those outside the boundary of the site.**

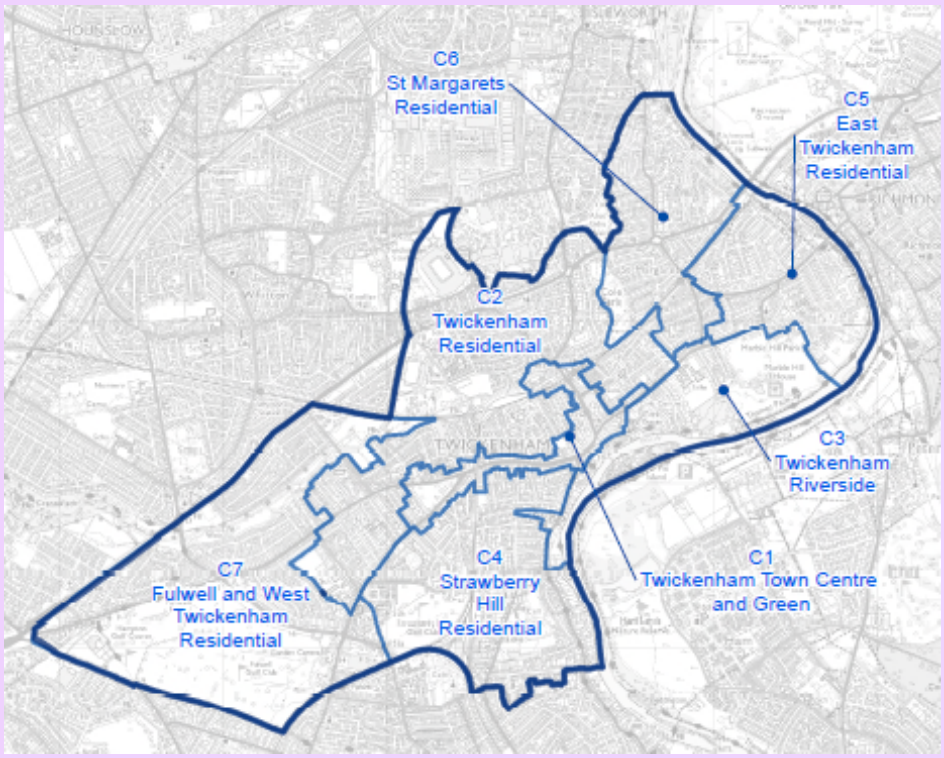
Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

8 Place-based Strategy for Twickenham, Strawberry Hill & St Margarets

Policy PBS3 Place-based Strategy for Twickenham, Strawberry Hill & St Margarets

Area Profile

The Twickenham, Strawberry Hill & St Margarets Area encompasses Twickenham Town Centre and Green, Twickenham Residential, and Twickenham Riverside, along with the residential areas of St Margarets and East Twickenham, and Strawberry Hill and Fulwell and West Twickenham Residential.



A green, leafy character away from the commercial town centre, particularly along the River Thames, is complemented by the River Crane, Crane Park and Fulwell Golf Course. There are many areas of high scenic quality of open space including the Thames Path, with the curving river giving expansive views and a sense of openness.

Twickenham is recognised as a district centre in the London Plan, with the area's night time economy classified as of more than local significance (NT3), medium commercial growth potential and B office guidelines (potential to accommodate new office development generally as part of mixed-use development). It offers a range of retail, leisure, education and community facilities. There are local centres at East Twickenham, and St Margarets, as well as local shopping provision across the area including at Crown Road, St Margarets Road, Twickenham Green, Strawberry Hill, Fulwell and Hospital Bridge Road.

The area is an important employment location with the Council and other offices in the centre, along with retail and service businesses, and other significant employers across the area, including a number of industrial estates. Twickenham Film Studios provides studios, post production and production solutions. Eel Pie Island, which is partly residential, also provides for river related industries such as boat building and repair, contributing to a working waterfront.

St Mary's University is a major educational institution, with a main campus in Strawberry Hill as well as facilities at Teddington Lock, and they also operate the Exchange community building in Twickenham Town Centre.

The area includes Twickenham's nationally important rugby venues at Twickenham Stadium, a world famous landmark and the home of Rugby Union, and The Stoop (Harlequins Rugby Football Club).

The area is home to some important historic riverside estates and their gardens, such as Marble Hill House, Orleans House, York House, Pope's Garden and Radnor Gardens. There is a range of other cultural and community facilities including the Twickenham Museum, The Mary Wallace Theatre, the World Rugby Museum, Turner's House, Orleans House Gallery and Strawberry Hill House.

The area is served by rail stations at Twickenham, Fulwell, Strawberry Hill and St Margarets. Redevelopment at Twickenham Station is being completed, which has delivered full accessibility and a new plaza with a link to the River Crane. There are river crossings towards Richmond town centre but over the River Thames in the Twickenham area there is only a seasonal pedestrian and cycle ferry that operates from the river bank at Marble Hill to Ham on the opposite bank.

As part of the Urban Design Study consultation in 2021 feedback was invited on what people valued in their area. For character area C1 Twickenham Town Centre, respondents scored highly for shops and restaurants and vibrancy. For character area C3 Twickenham Riverside respondents generally scored fairly highly, although particularly highly for attractiveness, tranquillity, and green spaces. C4 Strawberry Hill Residential received high scores for attractiveness, valuing heritage, tranquillity, and green spaces. Respondents scored C5 East Twickenham Residential highly for attractiveness, as they did for C6 St Margarets Residential.

Overall strategy

The Urban Design Study recognises that overall large parts of this area have high sensitivity to change, including for Twickenham Residential (C2), Twickenham Riverside (C3), Strawberry Hill Residential (C4), East Twickenham Residential (C5), and St Margarets Residential (C6). There may be small areas of lower sensitivity within the area where the townscape is less intact and does not reflect the character described in the key characteristics, and overall the areas of Twickenham Town Centre and Green (C1) and Fulwell and West Twickenham Residential (C7) have medium sensitivity to change with some potential for positive change.

For Twickenham Town Centre and Green (C1) the strategy identifies a strong sense of place, with the opportunity to enhance a coherent distinctiveness and strengthen existing character by upgrading inconsistent developments. For Twickenham Residential (C2) the strategy is to conserve, enhance and improve the character of this area by enhancing its legibility and the consistency of its built environment. For Twickenham Riverside (C3) it is identified as having a distinctive sense of place and high quality townscape, therefore the strategy is to conserve the character, elements and features whilst enhancing existing features where appropriate. For Strawberry Hill (C4) the strategy is to conserve and enhance the sense of identity, by improving public realm, townscape legibility and local hubs and parades. For East Twickenham Residential (C5) the strategy is to conserve the existing character, and enhance public realm and frontages along local parades. For St Margarets Residential (C6) it is identified as having a distinctive sense of place and characteristic elements in good condition, therefore the strategy is to conserve existing character and enhance elements and features, where appropriate. For Fulwell and West Twickenham Residential (C7) it recognises the character area has a less coherent character than other areas in the borough, therefore the strategy is to improve the character of the area, with future new development and creation of landmarks taking opportunities to add new character and sense of place.

Other initiatives

The Council supports businesses and retailers working with the current Twickenham Business Improvement District, Discover Twickenham. They work with businesses to engage visitors and promote local shops to the community, in addition to offering support and networking to the business community.

There is also the Church Street Association, a collection of traders who promote Church Street as a sought-after designation for businesses, residents and visitors, supporting initiatives such as alfresco dining.

Initial feasibility has been carried out for a new pedestrian and cycle bridge in the borough, with the best location found to be connecting Ham to Twickenham, with another suitable location identified as Ham to Radnor Gardens in Strawberry Hill. As set out in the Council's Third Local Implementation Plan, additional studies are required to determine the economic feasibility of the bridge, and funding for the bridge must still be found.

Vision

The vision for Twickenham is that it is a connected community with good access to leisure facilities, green spaces and its rivers, community networks and services.

The vision for Twickenham town centre is to serve local residents, workers and visitors – a destination of choice with a unique sense of place. The town will meet modern requirements and have a strong local economy whilst making the most of its distinctive heritage, open spaces and riverside.

The aim is to rejuvenate its business and cultural offer, with a new focus created by the riverfront experience, through development of key sites.

Twickenham's important sporting and cultural attractions will be maximised and disruption to local residents and businesses minimised.

The vision for Strawberry Hill is that it will continue to be a safe, and attractive family focused residential area. The local centre and railway station will be enhanced to create a real 'heart' to the area, whilst the contribution that its valued open spaces make to the area's character will be protected. St Mary's University will continue to contribute to the local community.

The vision for St Margarets and East Twickenham is to maintain the attractive residential character and to ensure that the shopping centres continue to thrive.

Policy

Future development in this place is expected, where relevant, to:

- **Contribute to a sense of activity and vibrancy in the town and local centres, to encourage arts, culture and leisure developments to enhance the mixed-use potential of the area and make it more of a destination to spend time.**
- **Encourage the provision of office floorspace and new flexible workspaces within the town centre and intensification of existing employment sites to provide for jobs and support local businesses.**
- **Ensure that any expansion and management of entertainment and leisure facilities is sensitive to the amenity of people who live in the centre and the wider functioning of the area, promoting the night-time economy through diversifying the range of cultural venues and offers, encouraging on-street al fresco dining and making a welcoming environment for all night-time economy users and workers.**
- **Enhance the public realm through creating high quality spaces and implement more high-quality street furniture, including implementing the East Twickenham streetscene improvements, providing a new public square or civic space at Twickenham Riverside, and reanimating local commercial areas such as Wellesley Parade.**

- **Promote routes for active travel and exercise, encouraging healthy activity and exploration of the area by local workers, visitors and residents. Support greening through tree-planting.**
- **Contribute to protecting, enhancing and making the most of the character of the built and open environment, including the River Thames and Crane riversides and associated river related activities and Twickenham working waterfront, including preserving and enhancing public access to the Thames.**
- **Support the cultural and community offer for both residents and visitors around the Twickenham Cultural Quarter, including the area focused around the Civic Centre, York House and Gardens, the Mary Wallace Theatre, Twickenham Museum and Library, with potential to extend as a cultural hub into the town centre and along the Riverside, to provide a destination for visitors, and encouraging outdoor temporary and permanent art and theatre interventions.**
- **Maintain and provide new public toilets within the public realm, supplementing the Richmond Community Toilet Scheme, including provision at Twickenham Station and to serve Twickenham Riverside.**

Within the town centre boundary, development is expected at Station Yard (Site Allocation 15) to provide additional residential use, and there is potential for new development to contribute to a mix of uses at Twickenham Telephone Exchange (Site Allocation 16). There is a tall building zone around the station and north of the railway line, where redevelopment has recently occurred, with a surrounding mid-rise buffer, for any future proposals to be considered against Policy 45 Tall and Mid-Rise Building Zones. At Twickenham Riverside and Water Lane/King Street (Site Allocation 17) there is the opportunity for the site to regenerate the town centre and increase footfall, making the Riverside a destination and improving its connectivity.

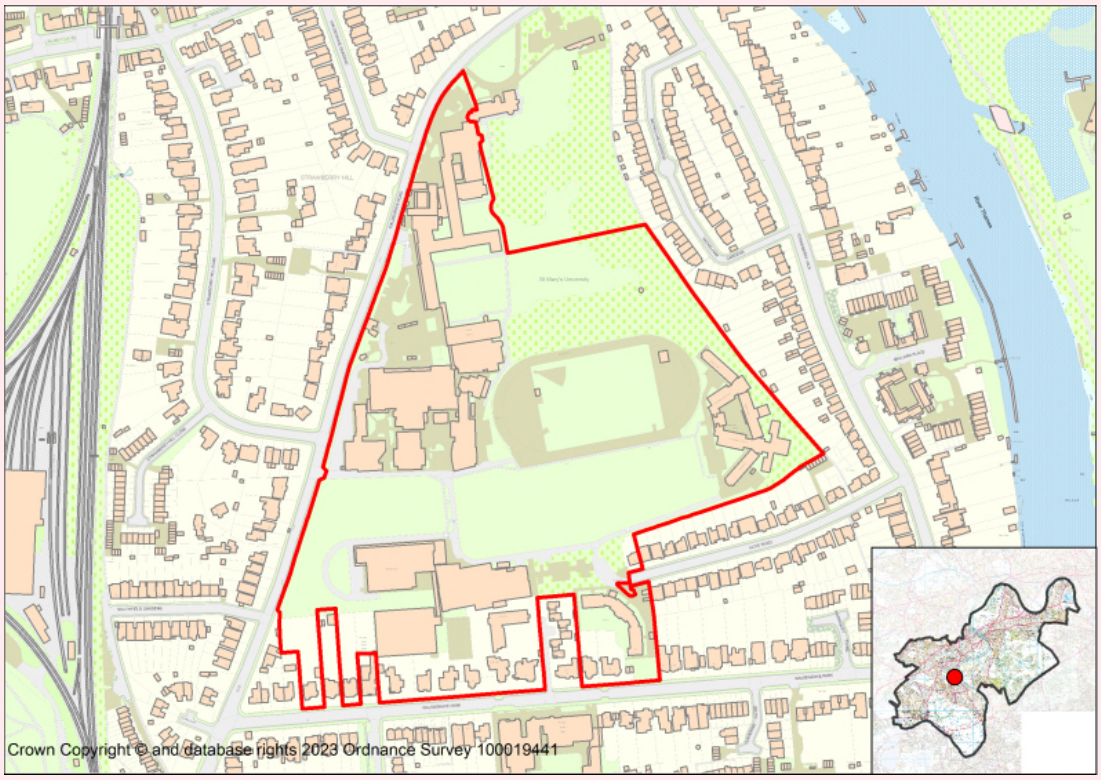
Outside of the town centre, there is an opportunity to enhance the sporting role of Twickenham Stadium (Site Allocation 13) and The Stoop (Site Allocation 12), and enhance the education offer at St Mary's University (Site Allocation 10) and Richmond upon Thames College (Site Allocation 11). At Mereway (Site Allocation 14) there is potential redevelopment for a social or community infrastructure use. There is opportunity to bring forward a residential-led redevelopment of the Homebase site on Twickenham Road (Site Allocation 18) as well as some residential which complements the bus garage operation and social infrastructure uses on site at the Fulwell Bus Garage (Site Allocation 19).

See details in the Site Allocations within this area:

- St Mary's University, Strawberry Hill
- Richmond upon Thames College, Twickenham
- The Stoop (Harlequins Rugby Football Club), Twickenham
- Twickenham Stadium, Twickenham
- Mereway Day Centre, Mereway Road, Twickenham
- Station Yard, Twickenham
- Twickenham Telephone Exchange
- Twickenham Riverside and Water Lane/King Street
- Homebase, Twickenham Road, Hanworth
- Fulwell Bus Garage, Wellington Road, Twickenham

Statement Site Allocation 10

St Mary's University, Strawberry Hill



CONTEXT: Proposed Site – St Mary's University, Waldegrave Road, Strawberry Hill, TW1 4SX			
Ward	South Twickenham	**Site Area**	12.08 ha
Land ownership	Private	**CIL Band**	Richmond CIL: South Twickenham – Low MCIL: Band 1
Existing land uses	University campus including teaching institutions and associated facilities, grounds, sports fields and facilities and residential accommodation (Use Class F). The University has an additional campus at Teddington Lock.		
Local Plan Place-Based Strategy	Twickenham, Strawberry Hill & St Margarets	**Urban Design Study Area**	C4 Strawberry Hill Residential
Village Plan Guidance	Character Area 9 'St Mary's University & Grounds', Strawberry Hill Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	None specified.	**Type of Centre**	None – out of centre
Transport / Highways	PTAL 2 'poor' Strawberry Hill Station approximate 4 minute walk No CPZ	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – St Mary's University, Waldegrave Road, Strawberry Hill, TW1 4SX			
Flood Risk	- Flood Zone 1 - Critical Drainage Area - Area Susceptible to Groundwater Flooding (>= 50% <75% risk)	**Trees**	- Significant number of trees subject to TPO on site - TPO Area Group T0497
Views	None		
Heritage Assets	CA54 Waldegrave Park Teddington Conservation Area (southern end of site) Archaeological Priority *Area:* Zone - Strawberry Hill Historic Park & Garden – Strawberry Hill (Grade II*) Listed Buildings • Strawberry House, 268 Waldegrave Road (Grade I) • St Mary's College Chapel, Waldegrave Road (Grade *I*I) • Chapel in the Woods, Waldegrave Road (Grade I) Building of Townscape Merit (BTM) • St Mary's College Chapel • 5, 9, 13-21 [odds], 33, 35 Waldegrave Park Adjacent to site: • Conservation Areas - CA43 Strawberry Hill Road (45m west), CA54 Waldegrave Park Teddington (directly south and part of site), CA44 Mallard Place Strawberry Hill (55m east), CA8 Twickenham Riverside (80m northeast) • BTMs - 311, 293 Waldegrave Road (west of site), 231-239 Waldegrave Road (southwest of site), 7, 11, Flats 1-7 31, 45-55 Waldegrave Road (south of site)	**Access to Open Space / Nature**	• Poorly Provided with Public Open Space • Strawberry Hill College grounds (on site) - Metropolitan Open Land (MOL) • River Thames (140m east) - MOL and Site of Importance for Nature Conservation (SINC) • Radnor Gardens (80m northeast) - MOL and Public Open Space • Rail Triangle Strawberry Hill Golf Course (160m west) - SINC • Strawberry Hill Golf Course (260m west) - MOL and SINC
Relevant Planning History	Extensive planning history relating to alterations and additions on site. No major planning applications to date.		
Description of Current Site Character	St Mary's College Campus is a highly sensitive site containing a number of Grade I and II Listed Buildings within a Grade II Historic Garden and MOL and part of the site falling with a conservation area. There are also a number of conservation areas and BTMs within close proximity of the site. The Grade I Listed Strawberry Hill House was built 1749-76 with some C19th additions. The site also comprises of some later, more modern additions, with buildings that house ancillary uses to the university as well as student residential accommodation. Access to the site is via Waldegrave Road.		

CONTEXT: Proposed Site – St Mary's University, Waldegrave Road, Strawberry Hill, TW1 4SX	
Neighbour Context	The immediate surrounding area is predominantly residential two-storeys in height. Heritage sensitivities are set out above, and there is also further designated MOL to the east. The site is bounded by Waldegrave Road to the west, Michelham Gardens and Strawberry Vale to the east and Waldegrave Park to the south.

Vision: Proposed site - St Mary's University, Strawberry Hill

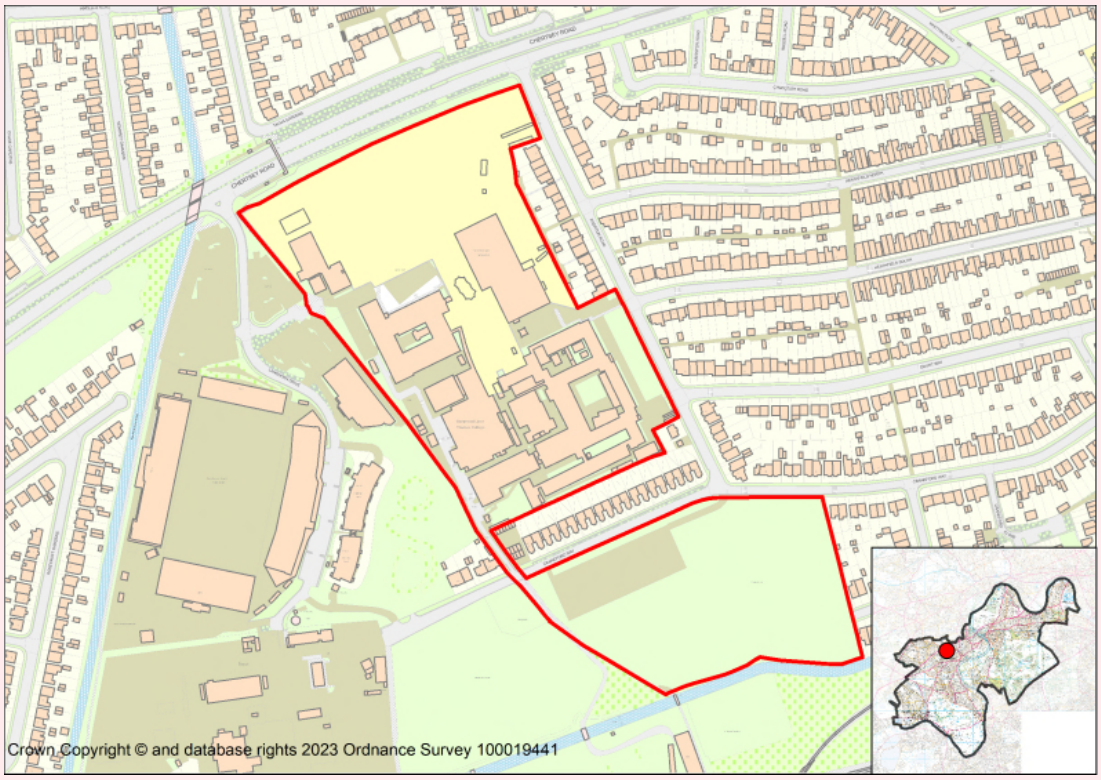
The retention and upgrading of St Mary's University and its associated teaching, sport and student residential accommodation is supported. Upgrade works include refurbishment, adaption, intensification, extensions and new build elements on site where justified fully, with full regard to national policies and the Development Management Plan, will be supported. A Masterplan and/or site development brief (SPD), which encompasses the main campus in Strawberry Hill as well as Teddington Lock, 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 future demand for university places as evidenced in the Local Housing Needs Assessment 2021. There is a need to improve and upgrade 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.**
- **The existing playing fields and sports facilities should be retained and/or re-provided, and if necessary, replacement facilities will have to be provided off site. Any reprovision of facilities should be equal or better standard than existing.**
- **It is acknowledged that this is a constrained site, with the majority of land not built on designated as MOL. Future development should protect and enhance the character and openness of the designated open land, including views and vistas. There are also listed buildings, BTMs proximity to conservation areas and also sports fields. Any development proposal should protect and, where possible, enhance the highly significant heritage assets and respect the special and unique location and setting of St Mary's University, including the Grade I Listed Chapel, adjoining Grade I listed building Strawberry Hill House and the associated Historic Park and Garden (II*) as well as the high quality Edwardian villas within the Waldegrave Park Conservation Area, having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 11

Richmond upon Thames College, Twickenham



CONTEXT: Richmond upon Thames College (RuTC), Langhorn Drive, Twickenham, TW2 7SJ			
Ward	St Margarets & North Twickenham	**Site Area**	8.65 ha
Land ownership	Public	**CIL Band**	Richmond CIL: St Margarets & North Twickenham– Low MCIL: Band 1
Existing land uses	Higher Education college campus, secondary school and SEN school (Use Class F)		
Local Plan Place-Based Strategy	Twickenham, Strawberry Hill & St Margarets	**Urban Design Study Area**	C4 Strawberry Hill Residential
Village Plan Guidance	Character Area 16 'Heatham Estate (inc. Richmond upon Thames College and The Stoop', Twickenham Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	Brownfield Land Register	**Type of Centre**	None – out of centre River Crane Area of Opportunity

CONTEXT: Richmond upon Thames College (RuTC), Langhorn Drive, Twickenham, TW2 7SJ			
Transport / Highways	• PTAL 0 'worst' • Twickenham Station approximate 15 minute walk • CPZ: R – Twickenham Events	**Air Quality**	Air Quality Management Area
Flood Risk	• Flood Zone 1 • Critical Drainage Area • Area Susceptible to Surface Water Flooding (1 in 1000 chance) • Area Susceptible to Groundwater Flooding (>= 75% risk)	**Trees**	• None protected on site • TPO protected trees on southern and eastern border • Adjacent to TPO Area Group Wood T0889 (west) • Established trees of townscape significant along border with Chertsey Road
Views	None		
Heritage Assets	Adjacent to site: • Conservation Area - CA46 Rosecroft Gardens Whitton (30m west)	**Access to Open Space / Nature**	• Playing fields on site • Crane Park - Metropolitan Open Land (MOL), Site of Importance for Nature Conservation (SINC) and Public Open Space (directly south and to west) • Harlequins Memorial Site – Other Open Land of Townscape Importance (OOLTI) and Public Open Space (directly west of site)
Relevant Planning History	• 15/3038/OUT - Outline application for the demolition of existing college buildings, removal of hardsurfacing, site clearance and groundworks together with the redevelopment of the site to provide: 1) A new campus for education and enterprise purposes, comprising; Replacement College (Use Class D1) of up to 16,000sqm to accommodate up to 3,000 FTE day time students, as well as evening and weekend use; A Science, Technology, Engineering and Maths (STEM) Centre (D1 Use Class) of up to 6,100sqm; 2) A new Secondary School (D1 Use Class) of up to 7,000 sqm for up to 750 students; 3) A new Special Educational Needs (SEN) School (D1 Use Class) of up to 4,000sqm for up to 115 students; 4) A new ancillary 'Technical Hub' for Haymarket Media (B1 Use Class) of up to 1,700sqm; 5) Replacement on-site sports centre (D2 Use Class) of up to 3,900sqm to serve both the college, schools and wider community; 6) The upgrading of existing Craneford Way playing fields for use by the college, schools and local community; 7) Alterations to existing means of access for vehicles, pedestrians and cyclists from the A316 involving the creation of a signalised junction, alterations to the A316 footbridge and minor realignment of Langhorn Drive, alterations of existing vehicular access points on Egerton Road as well as the upgrading of Marsh Farm Lane footpath; 8) Provision of on-site parking (non-residential) for up to 230 vehicles, open space and landscaping, and 9) A new residential development of up to 180 units together with associated parking for up to 190 vehicles, open space and landscaping. - Granted 16/08/2016 • 15/4456/FUL - Demolition of Richmond College buildings (Music, Science, Z, LRC and A blocks). - Granted 23/12/2015 • 21/3136/FUL - Demolition of existing college buildings, removal of hard-surfacing, site clearance and groundworks together with the redevelopment of the site to provide new residential units; together with associated parking, cycle parking, open space and landscaping. - Resolution to grant planning permission by Richmond Planning Committee (subject to S106 Agreement) 18/08/2022 • 22/1168/FUL - Alterations and extension to existing Sports Hall including associated landscaping within the Tech Hub Development Zone to replace Tech Hub building as defined under application 15/3038/OUT (as amended), and erection of Sports Hall with associated car parking, landscaping, and other works within the Main College Development Zone including erection of a Science, Technology, Engineering and Maths (STEM) building as approved under application 19/2517/RES (as amended), retention of existing Main College building as approved under application 16/4747/RES (as amended), and associated on-site parking (non-residential) and access roads. Both Sports Halls to serve the college, schools and wider community. (Application accompanied		

CONTEXT: Richmond upon Thames College (RuTC), Langhorn Drive, Twickenham, TW2 7SJ	
	by an Environmental Statement). - Resolution to grant planning permission by Richmond Planning Committee (Subject to S106 Agreement) 18/08/2022
Description of Current Site Character	The site contains a number of buildings associated with the RuTC use as well as a sports centre and playing fields. The site has a complex planning history. In 2016 outline planning permission was granted for the redevelopment of the site to provide a new college campus, secondary school, special educational needs (SEN) school, Science, Technology, Engineering and Maths (STEM) Centre, technical hub, replacements sports centre, upgrading of the playing fields and for residential development. The new main college building and two schools have been completed and are now in use. The STEM Centre is yet to be built. An application for detailed consent for the Technical Hub has been submitted, however there is no longer an intention to build this and it is expected that this application (ref. 19/2381/RES) is soon to be withdrawn. An affordable housing contribution secured via the S106 Agreement for the outline permission, should the Tech Hub not come forward, has now been paid. Further to this, a larger residential scheme has also been given resolution to grant planning permission from Richmond Planning Committee (subject to a S106 Agreement) which increases the affordable housing provision from 18% to 50% via 212 units (from 180). On-site parking spaces for 110 cars will also be provided. Detailed consent has been granted for the replacement sports centre, however resolution to grant planning permission from Richmond Planning Committee was recently given (subject to a S106 Agreement) for the retention and extension of the existing college sports hall (which is on the site of the previously intended Tech Hub), and for a new sports hall for the schools on the site of the originally approved larger sports hall, which would have been for used by both the schools, the college and local community. The sports hall will also be available for community use when not being used by the schools/college. Detailed consent has been granted for the upgrade to the sports fields to the south of Craneford Way and it is anticipated that this will be carried out in the near future. Existing building heights range up to five storeys (the main college building) and heights will also go up to five stories in the residential development zone. Vehicular access is via Egerton Road to the east, to on-site parking and cycle parking.
Neighbour Context	The site is bounded by the busy A316 Chertsey Road to the north. To the west is Marsh Farm Lane, a public footpath, and The Stoop (home to Harlequins Rugby Football Club). Beyond this to the rear Challenge Court in Langhorn Drive is open land. To the east is the quieter residential Egerton Road. Craneford Way is to the south, beyond which is Crane Park Playing Fields and Recreation Ground, designated MOL and Public Open Space. The only directly adjoining residential properties are 70-146 [evens] Craneford Way, which are two-storey maisonettes whose rear gardens abut the site. Nos. 150-156 Challenge Court, a four-storey block of flats, fronts the other side of Marsh Farm Way. Two-storey terraces front Egerton Road on the other side of the street. Streets leading of Egerton Road to the east comprise inter-war two-storey terraces. Beyond The Stoop to the west is the CA46 Rosecroft Gardens Conservation Area which comprises mainly of two-storey semi-detached and detached dwellings. A number of established trees line Chertsey Road which provide significant townscape value and visual relief. Details of improvements to Marsh Farm Lane have been approved but are not intended to be implemented until development works on the adjoining land have been completed. It is understood

CONTEXT: Richmond upon Thames College (RuTC), Langhorn Drive, Twickenham, TW2 7SJ	
	that TfL wish to carry out the junction improvements but now intend to remove the footbridge, subject to local consultation.

Vision: Proposed site - Richmond upon Thames College (RuTC), Twickenham

Appropriate redevelopment will continue the upgrade of the College campus to provide a new STEM Centre and new sports centre facilities, as well as residential including affordable housing. The recently replaced college and new secondary school and SEN school will be protected and retained. Development will include the protection and upgrade of the playing field to the south of the college, including installation of a new all-weather 3G astroturf playing pitch.

- **The Council continues to support the comprehensive redevelopment of the site, providing for a variety of educational needs in the borough, together with associated supporting residential development including affordable housing. In line with the London Plan, as this is publicly owned land, the Council expects that grant funding opportunities are explored to increase affordable housing provision above what is expected in policy.**
- **There is a clear identified need for a new campus for education and enterprise at the site.**
- **Multi-use is sought for the educational and sport 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 development does not lead to harmful impacts on the local road network.**
- **Any development is required to protect, and where possible, enhance the River Crane corridor.**
- **Development will be expected to improve coherence of the built form and a sense of place having regard for the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance SPD.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 12

The Stoop (Harlequins Rugby Football Club), Twickenham

CONTEXT: Proposed Site – The Stoop, Langhorn Drive Twickenham, TW2 7SX			
Ward	St Margarets & North Twickenham	**Site Area**	4.61 ha
Land ownership	Private	**CIL Band**	Richmond CIL: St Margarets & North Twickenham– Low MCIL: Band 1
Existing land uses	National sporting stadium for Harlequins Rugby Football Club (Harlequins RFC), standalone structures with associated uses, carparking (Use Class F2(c))		
Local Plan Place-Based Strategy	Twickenham, Strawberry Hill & St Margarets	**Urban Design Study Area**	C2 Twickenham Residential
Village Plan Guidance	Character Area 16 'Heatham Estate (inc. Richmond upon Thames College and The Stoop', Twickenham Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	None specifically though London Plan Policy S5 requires the retention of existing sporting stadiums	**Type of Centre**	None – out of centre

CONTEXT: Proposed Site – The Stoop, Langhorn Drive Twickenham, TW2 7SX			
Transport / Highways	• PTAL 0 'worst' • Twickenham Station approximate 14 minute walk • CPZ: HM/R - Heatham • Adjacent to Transport for London Road Network (TLRN)	**Air Quality**	Air Quality Management Area
Flood Risk	• Flood Zone 1 • Critical Drainage Area • Some parts Areas Susceptible to Surface Water Flooding (between 1 in 10, 100 and 1000 chance) • Area Susceptible to Groundwater Flooding (>= 75% risk)	**Trees**	• TPO Area Group Wood T0889
Views	None		
Heritage Assets	Adjacent to site: • Conservation Area - CA46 Rosecroft Gardens Whitton (immediately west) • Building of Townscape Merit (BTM) - Council Depot (70m south)	**Access to Open Space / Nature**	• Sporting stadium on site • Harlequins Memorial Site – Other open Land of Townscape Importance (OOLTI) and Public Open Space (directly east) • River Crane Area of Opportunity designation • Mereway Nature Reserve (140m south) • Duke of Northumberland River (nature corridor) directly west • Crane Park - Metropolitan Open Land (MOL), Site of Importance for Nature Conservation (SINC) and Public Open Space (140m south and 65m west)
Relevant Planning History	Various permissions for upgrade works to stadium and grounds, including new stands and associated standalone buildings/equipment.		
Description of Current Site Character	Twickenham Stoop Stadium, known as 'The Stoop', is a nationally-important modern all-seater sporting stadium home to Harlequins RFC, and a local landmark in Twickenham. There is extensive car parking to the north and a number of standalone structures associated with the stadium (drinks/food kiosk, staff office, toilets, Harlequins official clothing/merchandise store etc). The site is accessed via Langhorn Drive from the busy A316 Chertsey Road to the north, which forms part of the TLRN. The entire site is within the River Crane Area of Opportunity.		
Neighbour Context	North of Chertsey Road are a series of residential streets comprising inter-war two-storey semi-detached dwellings. The site is bounded by Langhorn Drive to the northeast, beyond which is Nuffield Health Centre and then the Richmond upon Thames College campus, which includes Clarendon Secondary School and Special Educational Needs School. A resolution to grant planning permission by Planning Committee for 212 homes was recently given. The College campus is also a Site Allocation in the Local Plan. To the east of the site is designated OOLTI and Public Open Space. The Open Land Review 2021 found this parcel (site no. 74 'Land at Harlequins') performed strongly against OOLTI designation criteria. Directly adjacent to the east is Challenge Court, two four-storey blocks of flats. South of the site is the Twickenham depot, a safeguarded waste site. The original depot building is a BTM.		

CONTEXT: Proposed Site – The Stoop, Langhorn Drive Twickenham, TW2 7SX	
	The Duke of Northumberland River runs along the western boundary of the site, which is MOL and a SINC. The river forms part of the CA46 Rosecroft Gardens Conservation Area whose border directly abuts the site. The Conservation Area comprises a triangular plot of residential streets (Rosecroft Gardens, Gladstone Avenue and Denehurst Gardens) of single-storey 1930s dwellings, and also Craneford Field. The park is MOL and adjoins the river at the northwestern corner of the site. Further afield to the south and southeast are Crane Park East and Cranefield Field West, in between which runs the River Crane, which comprise MOL, SINC and Public Open Space.

Vision: Proposed site - The Stoop, Twickenham

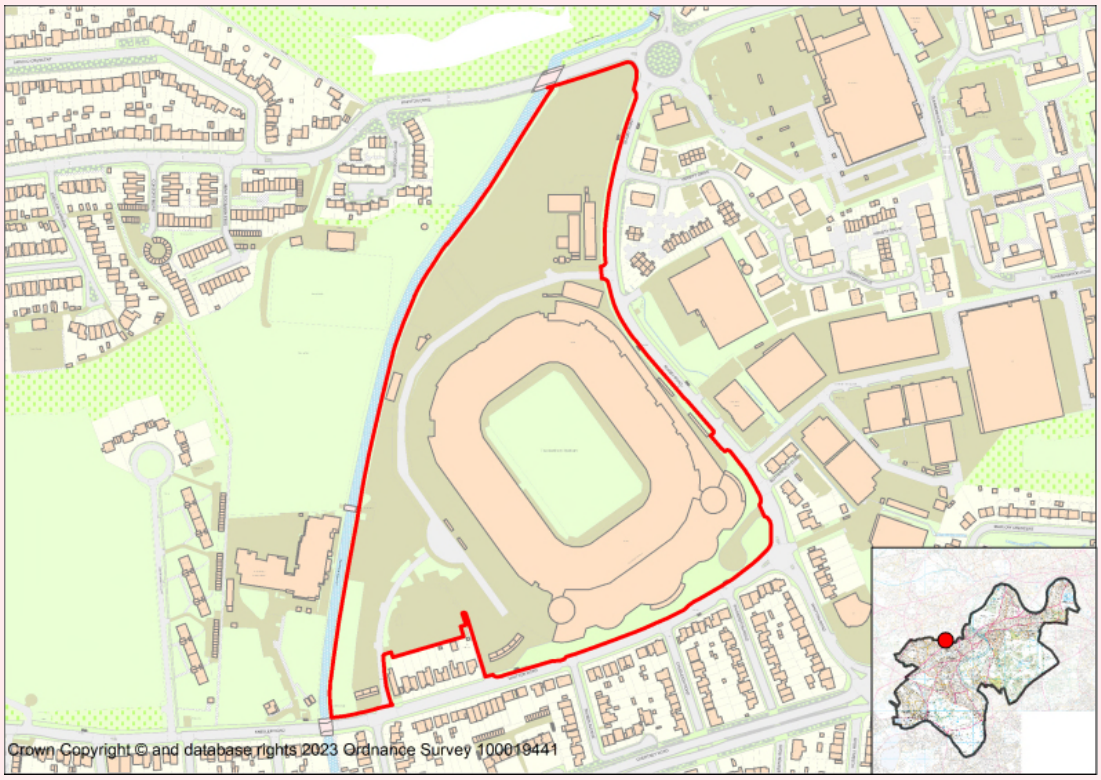
The Council supports the continued use of the grounds for sport uses. Appropriate additional facilities including a new north stand, indoor leisure, hotel or business uses, as well as residential uses including affordable housing, may be supported provided that they are complementary to the main use of the site as a sports ground.

- **The Council is committed to working in partnership with the Harlequins RFC to develop a Masterplan, which should set out the long-term strategy for development of the site.**
- **There is a need to retain, and where possible enhance, this nationally important sporting venue with its associated facilities to ensure it remains a world-class standard of facilities and visitor experience, as per Policy 26 of this Plan. Multi-use is sought for the sports and associated facilities, in line with other policies in the Plan.**
- **The Council will work in partnership with Harlequins RFC to understand the potential need for associated new facilities, such as a new and improved stadium or an upgrade to the existing, 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 primary sports use. A mixed-use scheme, which may include residential including affordable housing, may also be considered appropriate provided that other sporting and associated uses have been fully investigated and that the mixed use / residential use is compatible with the main use of the site.**
- **The Council will work closely with partners, including TfL and Harlequins RFC, to ensure development does not lead to unacceptable impacts on the local road network. Any scheme should include pedestrian routes where possible and encourage active travel.**
- **Any development proposal is required to protect, and where possible enhance, the River Crane corridor and the Duke of Northumberland River; and the character and openness of adjacent designated open land and the setting of the Rosecroft Conservation Area.**
- **The site has been identified in the Council's Urban Design Study as potentially appropriate for mid-rise buildings (5-6 storeys). Such development would need to be carefully located; respond positively to and protect the setting of existing buildings in the surrounding area, including heritage assets such as conservation areas, listed buildings and locally listed buildings; and provide high quality open space, as per Policy 45 Tall and Mid-Rise Building Zones in this Plan. Any development proposal should have regard for the design objectives set out in the relevant character area profile in the Urban Design Study.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 13

Twickenham Stadium, Twickenham



CONTEXT: Proposed Site – Twickenham Stadium (Rugby Football Union), 200 Whitton Road, Twickenham, TW2 7BA			
Ward	St Margarets & North Twickenham	**Site Area**	12.62 ha
Land ownership	Private	**CIL Band**	Richmond CIL: St Margarets & North Twickenham– Low MCIL: Band 1
Existing land uses	National sporting stadium home to English Rugby and the Rugby Football Union (RFU); associated uses to include a hotel, conference centre, museum, merchandise store, leisure centre and car park.		
Local Plan Place-Based Strategy	Twickenham, Strawberry Hill & St Margarets	**Urban Design Study Area**	C2 Twickenham Residential
Village Plan Guidance	None	**Neighbourhood Plan**	
London Plan Designations	None specifically though London Plan Policy S5 requires the retention of existing sporting stadiums	**Type of Centre**	None – out of centre

CONTEXT: Proposed Site – Twickenham Stadium (Rugby Football Union), 200 Whitton Road, Twickenham, TW2 7BA			
Transport / Highways	• PTAL 1a 'very poor' • Twickenham Station approximate 13 minute walk • CPZ: R – Twickenham Events • Adjacent to Transport for London Road Network (TLRN)	**Air Quality**	Air Quality Management Area
Flood Risk	• Flood Zone 2 • Critical Drainage Area • Some parts Areas Susceptible to Surface Water Flooding (between 1 in 10, 100 and 1000 chance) • Area Susceptible to Groundwater Flooding (> 50% >75% risk)	**Trees**	• Number of trees subject to TPO along eastern boundary
Views	None		
Heritage Assets	None	**Access to Open Space / Nature**	•Area Poorly Provided with Public Open Space • River Crane Area of Opportunity designation • Kneller Chase Bridge (partly within the site and to the west) - Metropolitan Open Land (MOL) • Duke of Northumberland River (directly west) - Site of Importance for Nature Conservation (SINC) • Twickenham Playing Fields (directly west) - MOL • Marlow Crescent Playground (190m east) - Public Open Space • Land between Chertsey Road and Glebe Side (190m southeast)- Other Open Land of Townscape Importance (OOLTI)
Relevant Planning History	Various permissions for upgrade works to stadium and grounds and associated temporary permissions.		
Description of Current Site Character	Twickenham Stadium is a modern all-seater sporting stadium home to English rugby and the RFU, and a local landmark in Twickenham. The southern end of the stadium also includes the World Rugby Museum, England Rugby store, conference centre, Marriot hotel and leisure centre. The site is accessed via Rugby Road from the east, which connects to the Whitton Dene/Modgen Lane roundabout to the north and Whitton Road to the south. Associated on-site car parking and servicing yard is to the southwest and north of the stadium, where there are also some single-storey temporary structures associated with the stadium use.		

CONTEXT: Proposed Site – Twickenham Stadium (Rugby Football Union), 200 Whitton Road, Twickenham, TW2 7BA	
Neighbour Context	The Duke of Northumberland River runs along the western boundary of the site, which is an important nature corridor and MOL, as are the playing fields beyond. Chase Bridge Primary School is also located at this boundary. To the south of the site are residential streets leading off (and including) Whitton Road (Palmerston Road, Tayben Avenue, Talma Gardens) which comprise two-storey dwellings. East of the south on the other side of Rugby Road is Twickenham Trading Estate which comprises a series of purpose-built large industrial and business units, mainly two storeys in height. Northeast of the site is the Varsity Drive housing estate comprising two-storey dwellings, beyond which to the east is a larger Tesco Extra supermarket, car park and petrol station. There are also two-storey dwellings to the northwest of the site on residential streets off (and including) Whitton Dene. On the other side of Whitton Dene to the north is a large sewerage works plant.

Vision: Proposed site - Twickenham Stadium, Twickenham

The Council supports the continued use and improvement of the grounds for sport uses. Appropriate additional facilities including new stands, indoor leisure, hotel or business uses, as well as hospitality, conference facilities, food and beverage and associated retail, may be supported provided that they are complementary to the main use of the site as a sports ground.

- **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 the site.**
- **There is a need to retain, and where possible enhance, this nationally important sporting venue with its associated facilities to ensure it remains a world-class standard of facilities and visitor experience, as per Policy 26 of this Plan. Multi-use is sought for the sports and associated facilities, in line with other policies in the Plan.**
- **The Council will work in partnership with the RFU to understand the potential need for associated new and complementary facilities. Appropriate additional facilities could include new stands, indoor leisure, hotel or business uses, as well as conference facilities. hospitality, food and beverage and associated retail. The applicant will have to demonstrate that additional facilities do not lead to a harmful impact on the vitality and viability of Twickenham town centre.**
- **The Council recognises the important revenue-generating role that continued entertainment uses on site have for the viability of the sporting stadium. An entertainment use on site will be supported where it is secondary to the primary sporting function and where it has been demonstrated that there would be no unacceptable impact on the local road network and amenities of Twickenham residents.**
- **There is a general need for new office floorspace in the borough. In the event of an area of the site being declared surplus to requirements, the opportunity to provide for employment floorspace, such as offices, a business park or other commercial uses, should be firstly explored. A mixed-use scheme, which may include 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. A residential scheme would need to take into account the presence of the existing sewerage treatment works to the north of the site and impact on residential amenities considered. The submission of an odour impact assessment would be require~~s~~*d* upfront.**
- ~~**There is a need to retain** *P*~~**parking provision**~~**, particularly for coaches, servicing facilities and space for spectators and related services,** *should be*~~ **in line with London Plan standards** ***and should include coach parking and servicing facilities*****. The Council will**

work closely with partners, including TfL and RFU, to ensure development does not lead to unacceptable impacts on the local road network. Any scheme should improve pedestrian routes where possible and encourage active travel.

- **The MOL to the east of the Duke of Northumberland River forms part of a valued green corridor. The Open Land Review 2021 found that this land should be improved to enhance provision for wildlife and access. Any development proposal is required to protect and where possible enhance the Duke of Northumberland River, including access to it and the associated MOL.**
- **Building heights will be expected to step down from the stadium towards the boundary to respect the existing low-rise character of the surrounding area. Development will be expected to have regard for the design objectives and general guidance set out in the relevant character area profile in the Urban Design Study.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 14

Mereway Day Centre, Mereway Road, Twickenham

CONTEXT: Proposed Site – Mereway Day Centre, Mereway Road, Twickenham, TW2 6RF			
Ward	South Twickenham	**Site Area**	0.23 ha
Land ownership	Public	**CIL Band**	Richmond CIL: South Twickenham– Low MCIL: Band 1
Existing land uses	Social / community infrastructure; the site is currently vacant following demolition of a day centre (Use Class F2), which closed in 2007		
Local Plan Place-Based Strategy	Twickenham, Strawberry Hill & St Margarets	**Urban Design Study Area**	C2 Twickenham Residential
Village Plan Guidance	Character Area 11 'North of the Green', Twickenham Village Planning Guidance Area	**Neighbourhood Plan**	
London Plan Designations	Brownfield Land Register	**Type of Centre**	None – out of centre
Transport / Highways	• PTAL 1b 'very poor' • Whitton Station approximate 18 minute walk, Twickenham Station approximate 13 minute walk • CPZ: WT – West Twickenham	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Mereway Day Centre, Mereway Road, Twickenham, TW2 6RF			
Flood Risk	• Flood Zone 2 • Area Susceptible to Surface Water Flooding (1 in 1000 chance) • Area Susceptible to Groundwater Flooding (>75% risk)	**Trees**	None protected though there are some significant trees on the river bank.
Views	None		
Heritage Assets	Archaeological Priority *Area:* Zone – Crane Valley	**Access to Open Space / Nature**	• River Crane Area of Opportunity (directly north) • Crane Park East (directly north) - Metropolitan Open Land (MOL), Site of Importance for Nature Conservation (SINC) • Mereway Nature Park (directly north) - SINC • Mereway Former Allotments (directly north) - Public Open Space • River Crane (directly west and north) - SINC • Duke of Northumberland River (40m northwest) - SINC • Kneller Gardens (100m west) - Public Open Space
Relevant Planning History	• 20/0726/DEMPN - Demolition of existing building including all floor slabs and foundations. - Prior approval granted 29/09/2020 • An application ~~has been submitted and is awaiting validation~~ for a residential development and associated car parking *was granted planning permission 01/02/2024 (ref.23/0260/FUL)*.		
Description of Current Site Character	The site fronts the Rover Crane to the north. It previously consisted of the Mereway Centre, a single-storey community day centre, which closed in 2007. Following the building's recent demolition, the site is now vacant, comprising of a grassed area and parking/hardstanding. Access to the site is via Mereway Road to the west, and south of the bridge which crosses the River Crane.		
Neighbour Context	The site is located in an ecologically sensitive location, next to the River Crane, adjacent to a wildlife conservation area and part of the Crane Corridor. Directly adjacent to the site is MOL and a number of SINCs. The surrounding context is predominantly two-storey residential dwelling. Mereway Road to the west is main late Victorian and early Edwardian properties, with some recent two-storey with accommodation in the roof development on Barneby Close and flats in Rowntree House to the south and east.		

Vision: Proposed site - Mereway Day Centre, Mereway Road, Twickenham

Social and community infrastructure uses to meet local needs are the most appropriate land uses for this site, given its existing land use and location in a primarily residential area.

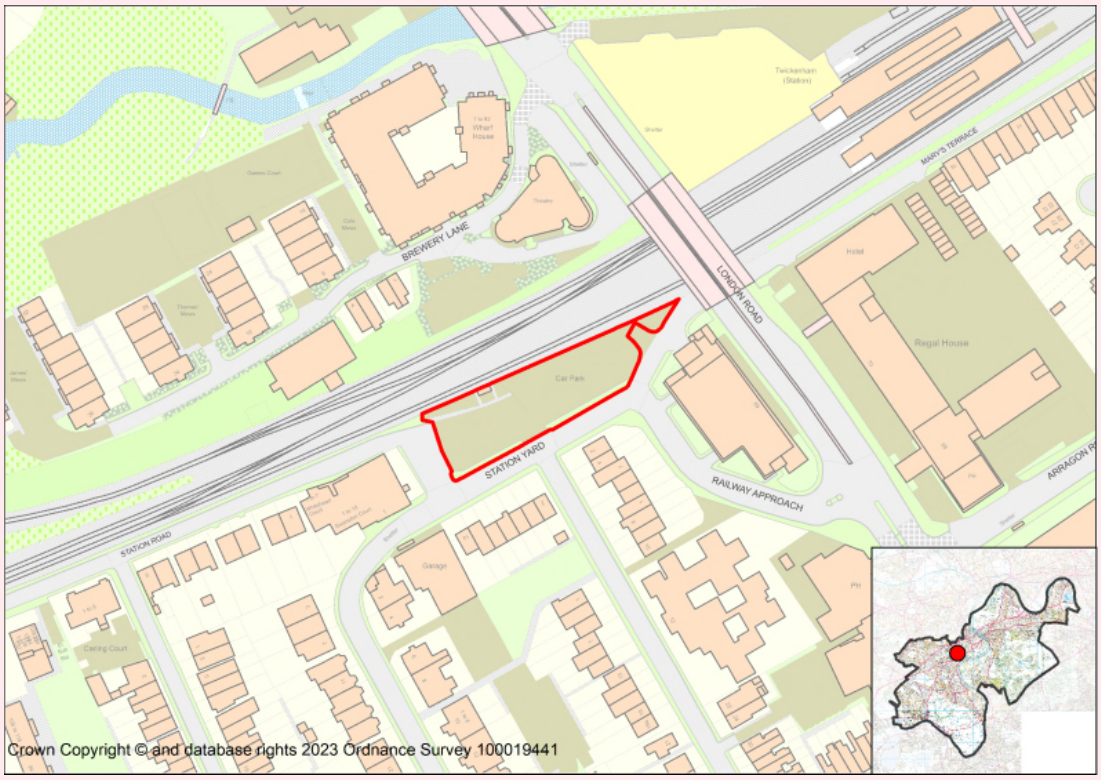
- **Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with policy-compliant levels of affordable housing and on-site car parking provision in line with London Plan standards be considered as a potential redevelopment option.**

- **Policy 49 Social and Community Infrastructure in this Plan proposes that should a scheme come forward for redevelopment or change of use to 100% genuinely affordable housing, in accordance with Policy 11 Affordable Housing in terms of mix, tenure and affordability, then it would not need to be considered for alternative social infrastructure use nor marketing evidence submitted. In those circumstances, a wholly affordable housing scheme would be supported.**
- **Any development proposal is required to protect, and where possible enhance, the River Crane corridor and the character and openness of adjacent designated open land.**
- **Development will be expected to have regard for the design objectives and general guidance set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance for the area.**
- **Given the small size of the site, the Council's preference is for the development of the whole site to fully unlock the site's potential to deliver a viable scheme which meets the requirements above. Were a partial development to come forward, it should be demonstrated that this would not restrict the feasibility of the remainder of the site, and the site as a whole, from meeting the requirements of the Site Allocation.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 15

Station Yard, Twickenham



CONTEXT: Proposed Site – Station Yard, Twickenham, TW1 4LJ			
Ward	Twickenham Riverside	**Site Area**	0.17 ha
Land ownership	Public/private	**CIL Band**	Richmond CIL: Twickenham Riverside – Higher MCIL: Band 1
Existing land uses	Bus waiting stand; station car park (Sui Generis). Permission was granted in 2021 for 46 residential units (Use Class C3) on the eastern side of the site.		
Local Plan Place-Based Strategy	Twickenham, Strawberry Hill & St Margarets	**Urban Design Study Area**	C1 Twickenham Town Centre and Green
Village Plan Guidance	None	**Neighbourhood Plan**	
London Plan Designations	Brownfield Land Register	**Type of Centre**	Twickenham Town Centre Boundary
Transport / Highways	• PTAL 5 'very good' • Twickenham Station approximate 2 minute walk • CPZ: D – Central Twickenham	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Station Yard, Twickenham, TW1 4LJ			
Flood Risk	• Flood Zone 1 • Town Centre Boundary Buffer Zone • Area Susceptible to Surface Water Flooding (1 in 1000 chance) • Area Susceptible to Groundwater Flooding (<25% risk) • Throughflow Catchment Area	**Trees**	None
Views	None		
Heritage Assets	Adjacent to site: • Conservation Area - CA47 Queens Road Twickenham (10m west and 100m south) • Buildings of Townscape Merit (BTMs) - The Albany Public House (10m west), 2&4 Queens Road (30m southwest), 1-4 Railway Cottages Brewery Lane and former industrial building west of cottages (30m north and northwest)	**Access to Open Space / Nature**	• Twickenham Rail Land (directly adjacent north) Site of Importance for Nature Conservation (SINC) • Crane Park East (80m north) - Metropolitan Open Land (MOL)
Relevant Planning History	• 19/3616/FUL - Proposed redevelopment of existing car park to provide a new building of 5 to 6 storeys, comprising 46 no. residential units (Use Class C3), disabled car parking, cycle parking, landscaping, enhancements to public realm and associated works. - Granted 03/03/2021		
Description of Current Site Character	Located in Twickenham town centre close to Twickenham Railway Station, the site has a previous industrial land use (railway land). To the east the site is currently fenced off having previously been in use as a car park for the station and residents of Mary Terrace, whilst the station development works have been ongoing. This land is anticipated to become surplus to requirements once the overall development of Twickenham Station has been completed. The western part of the site is owned by TfL and is used intermittently as bus waiting stands. Its use is particularly important on Twickenham Stadium event days. The former car park on the east of the site was granted planning permission in 2021 for redevelopment for 46 new residential units of 5-6 storeys, disabled car parking, cycle parking and associated works including landscaping and enhanced public realm. This permission has not yet been implemented.		
Neighbour Context	The site directly adjoins the railway line to the north. To the west is the locally listed The Albany public house and the boundary of the Queens Road Twickenham Conservation Area, which contains a number of BTMs in relatively close proximity to the site. The immediately surrounding area south of the railway line is mixed though predominantly residential, comprising mainly of two- to three-storey late Victorian/early Edwardian dwellings. The five-storey office building Bridge House is located to the southwest. To the north of the railway line is the recently completed Brewery Wharf development comprising of a series of 3-5 storey buildings, including The Exchange, a community use building. A three minute walk to the east across the London Road bridge is Twickenham Station, which is currently at an advanced stage of development comprising three buildings ranging between 2-7		

CONTEXT: Proposed Site – Station Yard, Twickenham, TW1 4LJ	
	storeys. The Regal House Travelodge (9 storeys) is located east of the site on the opposite site of London Road.

Vision: Proposed site - Station Yard, Twickenham

The site presents an opportunity for a residential scheme, which would also be expected to improve the public realm/landscaping. The bus stands should be retained, redeveloped or re-sited in a suitable location.

- **The bus stands on the site are important on Twickenham Stadium event days. Any comprehensive development of the site would require their retention, redevelopment or re-siting, in consultation with TfL, as well as adequate standing capacity and drivers' facilities.**
- **A future development is expected to retain and improve the existing cycle route and also the pedestrian link to the station via steps on the other side of the London Road bridge. There are opportunities to improve these existing links in terms of safety and permeability.**
- **Any development should be designed to provide an attractive frontage towards The Albany Public House. Development is expected to improve the public realm through high quality tree planting and other landscaping to improve the quality of the environment, and to complement the Council's own public realm improvements around The Albany.**
- **The site is in a constrained location with the railway line to the north. Any development should make sure that the amenities of future residents is protected.**
- **The Urban Design Study identifies part of Station Yard as a mid-rise building zone (5-6 storeys), with the opportunity for any new development to respond appropriately to the surrounding landscape and scale, in accordance with Local Plan Policy 45 Tall and Mid-Rise Building Zones. The mid-rise zone in this location provides an area of transition to the tall building zone to the north (i.e. Twickenham Station), Bridge House to the east and the more modest buildings to the south as well as the three-storey The Albany Public House. Building heights should step down from Bridge House and act as an intermediary with the smaller-scale surrounding residential properties and The Albany.**
- **The design of any proposal should take into account the setting and character of the adjacent Queens Road Twickenham Conservation Area and locally listed The Albany, as well as the character and openness of adjacent designated open land. Development should have regard for the design objectives and general guidance set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance for the area.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 16

Twickenham Telephone Exchange

CONTEXT: Proposed Site – Twickenham Telephone Exchange, Garfield Road Twickenham, TW1 3JS			
Ward	Twickenham Riverside	**Site Area**	0.18 ha
Land ownership	Private	**CIL Band**	Richmond CIL: Twickenham Riverside – Higher MCIL: Band 1
Existing land uses	Telephone exchange (sui generis) and associated office space		
Local Plan Place-Based Strategy	Twickenham, Strawberry Hill & St Margarets	**Urban Design Study Area**	C1 Twickenham Town Centre and Green
Village Plan Guidance	None	**Neighbourhood Plan**	
London Plan Designations	Brownfield Land Register	**Type of Centre**	Twickenham ~~Main~~ *Town* Centre Boundary
Transport / Highways	• PTAL 5 'very good' • Twickenham Station approximate 4 minute walk • CPZ: D – Central Twickenham	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Twickenham Telephone Exchange, Garfield Road Twickenham, TW1 3JS			
Flood Risk	• Flood Zone 1 • ~~Main~~ *Town* Centre Boundary Buffer Zone • Area Susceptible to Groundwater Flooding (<25% risk) • Throughflow Catchment Area	**Trees**	None
Views	None		
Heritage Assets	Building of Townscape Merit (BTM) - Twickenham Police Station Adjacent to site: • Conservation Area - CA8 Twickenham Riverside (directly south and west) • Listed Buildings – Central Library (Grade II) (14m west) • Buildings of Townscape Merit (BTMs) - 21-31 [odds] York Street (directly south), 3-19 [odds] York Street (17-60, southwest), 27-37 [odds] Arragon Road (20m east), 2-24 [evens] London Road (24-70m east)	**Access to Open Space / Nature**	• Garfield Road Park Open Space (19m northwest) - Other Open Land of Townscape Importance (OOLTI) and Public Open Space
Relevant Planning History	None.		
Description of Current Site Character	The Telephone Exchange is a detached three-storey flat roofed building in Twickenham town centre within the Twickenham Cultural Quarter. The building fronts Greenfield Road though its rear façade fronts Arragon Road. Both these frontages are inactive and currently detract from the streetscene. Access is via the eastern side of Garfield Road where there is also vehicular access to a small servicing yard to the north of the building. The site is subject to an Article 4 Direction restricting change of use from commercial to residential.		
Neighbour Context	The surrounding area is a mix of uses comprising residential, commercial, offices and the Grade II Listed library directly opposite Garfield Road. Immediately north and to the northeast is Sandringham Court, comprising two 3-storey purpose-built blocks of flats with paved courtyard in the centre. Directly east is the locally listed art deco 3-storey shopping parade with residential in upper floors, which fronts York Street and marks the boundary of the CA8 Twickenham Riverside Conservation Area. Next to the library, opposite the site on Garfield Road, is the rear of the locally listed William Webb Ellis public house which fronts London Road. Opposite the rear of the site on the opposite of Arragon Road are Georgian terraces typically 2 and a half to 3 and a half storeys in height, some of which are BTMs. To the northwest of the site is a popular pedestrian cut-through to London Road, via Greenfield Road Park; a small designated area of open land wand through-route to a multi-storey car park on Arragon Road, and shops and restaurants on London Road, including a Waitrose supermarket.		

CONTEXT: Proposed Site – Twickenham Telephone Exchange, Garfield Road Twickenham, TW1 3JS	
	Twickenham Station is located 300m north.

Vision: Proposed site - Twickenham Telephone Exchange

If the Telephone Exchange is declared surplus to requirements, there is an opportunity for the comprehensive redevelopment of the whole site for a mixed-use scheme, comprising commercial / retail and residential.

- **There is an expectation that redevelopment provides employment space in this Town Centre boundary. There is opportunity for a range of commercial and retail uses suitable on the site, such as space for creative industries, an indoor retail/food market, niche retail or a small cinema. The optimum location of these uses would be on the ground floor fronting Garfield Road, to extend the town centre offer and enhance the Twickenham Cultural Quarter.**
- **Residential uses would be suited to the upper floors and the area fronting Arragon Road.**
- **Any redevelopment should create an active and attractive frontage on both Garfield Road and Arragon Road. The frontage of Garfield Road should be designed to enhance the vibrancy of the area. It should be designed to create cohesion with the Grade II Listed Building opposite and the green link through Garfield Road Park. The frontage along Arragon Road, whilst residential, should still be active and provide visual stimulation (such as no large blank facades with small windows) whilst still providing security to future residents.**
- **Careful consideration of the roof treatment and overall design and materials would be required to ensure there is no harm to the adjacent Conservation Area, having regard to the design objectives set out in the relevant character area profile in the Urban Design Study.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 17

Twickenham Riverside and Water Lane/King Street

CONTEXT: Proposed Site – Twickenham Riverside and Water Lane/King Street, Twickenham, TW1 3SD/3DX			
Ward	Twickenham Riverside	**Site Area**	1.06 ha
Land ownership	Mixed including public	**CIL Band**	Richmond CIL: Twickenham Riverside – Higher MCIL: Band 1
Existing land uses	Pontoon; pavilion (café/bar) with community use and associated children's play area and public toilets (Diamond Gardens) (Sui Generis); commercial / retail (Use Class E), gym (Use Class E) and residential (Use Class C3)		
Local Plan Place-Based Strategy	Twickenham, Strawberry Hill & St Margarets	**Urban Design Study Area**	C3 Twickenham Riverside
Village Plan Guidance	None	**Neighbourhood Plan**	
London Plan Designations	Brownfield Land Register	**Type of Centre**	Twickenham ~~Main~~ *Town* Centre Boundary
Transport / Highways	• PTAL 5-6a 'very good to excellent' • Twickenham Station approximate 8 minute walk • CPZ: D – Central Twickenham	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Twickenham Riverside and Water Lane/King Street, Twickenham, TW1 3SD/3DX			
Flood Risk	• Flood Zones 2 and 3a/b (southern boundary); Flood Zone 1 (remainder of site) • ~~Main~~ *Town* Centre Boundary Buffer Zone • Critical Drainage Area • Area Susceptible to Groundwater Flooding (<25% risk) • Throughflow Catchment Area	**Trees**	None subject to TPO though Diamond Jubilee Gardens contains high quality trees protected by the Conservation Area. There are street trees on King Street which provide significant townscape value.
Views	None		
Heritage Assets	CA8 Twickenham Riverside Conservation Area (south and eastern part of site and adjacent immediately north) Archaeological Priority Zone - Twickenham & Marble Hill Building of Townscape Merit (BTM) - Queen Hall rear of 9 King Street Adjacent to site: • Conservation Area - CA47 Queens Road Twickenham (immediately north) • Listed Buildings – Boat House Cross Deep Wharf (Grade II) (15m southwest). 10-12, 28-36 [evens] King Street (Grade II) (immediately north), 2 York Street (Grade II) (25m northeast), 52, 60-62 King Street (Grade II) (40m northwest), telephone kiosk (Grade II) (junction of King Street and Water Lane) • BTMs – 6-8, 16-22, 26-30, 46-52 [evens] King Street (immediately north), 31 Church Street, 9-21 [odds] Water Lane (immediately east)	**Access to Open Space / Nature**	• Diamond Jubilee Gardens (on site) • River Thames (immediately south) - Metropolitan Open Land (MOL) Other Open Land of Townscape Importance (OOLTI) and Public Open and Site of Importance for Nature Conservation (SINC)
Relevant Planning History	• 21/2758/FUL - Demolition of existing buildings and structures and redevelopment of the site comprising 45 residential units (Use Class C3), ground floor commercial/retail/cafe (Use Class E), public house (Sui Generis), boathouse locker storage, floating pontoon and floating ecosystems with associated landscaping, reprovision of Diamond Jubilee Gardens, alterations to highway layout and parking provision and other relevant works. - Resolution to grant planning permission by Planning Committee 24/11/2022		
Description of Current Site Character	The site is located in the centre of Twickenham and occupies frontages to three roads: King Street to the north, Water Lane to the east and The Embankment to the south, which fronts the River Thames. Formerly the Twickenham Lido in the southern section of the site fronting the river is designated brownfield land. It was redeveloped in the 2000s to house a pavilion with café with community uses and associated children's playspace and public toilets. Renamed Diamond Jubilee Gardens, this area is open to the public and is managed by the Twickenham Riverside Trust. To the east on Water Land is a car park, substation and derelict office blocks 2-3 storeys in height. Fronting King Street to the north, at the corner is a post-war commercial/retail parade 2 storeys in height, which adjoins a 3-storey art deco parade. Some of the upper floors are residential.		

CONTEXT: Proposed Site – Twickenham Riverside and Water Lane/King Street, Twickenham, TW1 3SD/3DX	
	Diamond Jubilee Gardens is separated from the commercial units to the north via an access line off Wharf Lane to the west. Onsite rear parking is provided here for the commercial units/flats fronting King Street. Part of the site is in CA8 Twickenham Riverside Conservation Area but not the commercial units. CA47 Queens Road Twickenham Conservation Area is directly adjacent to the north. Queens Hall to the rear of 8 King Street is a BTM. Resolution to grant planning approval was recently given by Planning Committee for redevelopment of the site for 45 new flats, commercial/retail/cafe space, public house, boathouse storage, pontoon and reprovision of Diamond Jubilee Gardens.
Neighbour Context	The surrounding area comprises a mix of commercial, office and residential uses, with Twickenham Station an 8 minute walk to the north. Bounding the site to the south is the Embankment, which is 23-30m in width from the River Thames. Most of this space is a car park though it also forms part of the Thames Path trail. To the southeast is the bridge to Eel Pie Island. The Thames Path trail passes through the south of the site. Modern 2-storey dwellings front Water Lane to the east, with shops at the northern end which adjoin the busy shopping centre on King Street, where there are a number of Listed Buildings and BTMs. Wharf Lane which abounds the site to the west has an inactive and unattractive frontage. On the opposite side of the site, the lane comprises enclosed rear walls of shops/flats fronting King Street to the north; Thames Eyot & Eyot Lodge flats to the south, and an access point to a car park and servicing area. These residential flats are 3-storeys in height and are accessed from Cross Deep, which runs south from King Street.

Vision: Proposed site - Twickenham Riverside & Water Lane/King Street

There is an opportunity for the comprehensive redevelopment of the site to provide residential, including affordable housing, and a range of commercial uses to bring back into use large parts of the area that are currently derelict; either through new-build or converting existing buildings. Development should provide high-quality public realm and improvements to the riverside and open space.

- **There is an opportunity to improve connections between the core of the town centre and the riverside to create a destination.**
- **Due to its town centre location, the site could accommodate a range of commercial uses, including retail, office, cafes, restaurant/public house or hotel. Retail should be maintained at ground-floor ~~of~~*in* the existing *Primary Shopping Area* ~~retail frontage~~ of King Street. As this site is on one of the Borough's town centres, there is an expectation that any proposal provides employment floorspace, particularly offices which could be in the form of flexible shared workspaces.**
- **Residential uses should be located on the upper floors to retain/provide active commercial frontages on the ground floor. Affordable housing should be provided at policy compliant levels.**
- **The Council expects that high-quality public realm is created within the site, with a new public square or civic space that can be used for events and playspace. There is an aspiration to provide public toilets. Any proposal should include open space that is a minimum equivalent as the existing provision, in terms of quantum and quality, and open and accessible to the public. This can be achieved through improvements/enhancements to the Diamond Jubilee Gardens or through reprovision and redistribution within the site.**
- **Hard or soft landscape design should increase the urban greening of the site and provide outdoor space for outdoor activities and uses. It should provide coherent routes through the site to promote active travel such as walking and cycling.**

- **Any proposal should seek to maintain the Embankment as a working quay. Development should provide mooring and landing facilities and show consideration of the character and function of Eel Pie Island.**
- **Given the high PTAL, a reduction in car parking is sought to improve the environment of the Embankment. There should be a comprehensive approach to servicing and delivery.**
- **Owing to the site's location on the banks of the River Thames, flood defences should be upgraded and improved. Works should be informed by discussions with the Environment Agency.**
- **Given the heritage sensitivities, the density of the new development should be optimised in a way appropriate to this immediate context. Overall design, heights and massing would be required to take views into account; ensure there is no harm to the Conservation Areas and settings of listed buildings and BTMs; and have regard to the design objectives set out in the relevant character area profile in the Urban Design Study.**
- **It is recognised that a planning application for redevelopment of the site for a mixed-use scheme comprising residential and commercial has recently received resolve to grant permission by Planning Committee.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 18

Homebase, Twickenham Road, Hanworth

CONTEXT: Proposed Site – Homebase, Twickenham Road, Hanworth, TW13 6EZ			
Ward	West Twickenham	**Site Area**	1.5 ha
Land ownership	Homebase	**CIL Band**	Richmond CIL: West Twickenham – Low MCIL: Band 1
Existing land uses	Retail use hardware store and associated car park (Use Class E); small section of car park in temporary use as windscreen repair service; McDonalds drive-thru (Use Class E)		
Local Plan Place-Based Strategy	Twickenham, Strawberry Hill & St Margarets	**Urban Design Study Area**	C7 Fulwell & West Twickenham Residential
Village Plan Guidance	Character Area 1 'Rivermead and Surrounds', Twickenham Village Planning Guidance	**Neighbourhood Plan**	
London Plan Designations	None specified.	**Type of Centre**	None – out of town centre
Transport / Highways	• PTAL 2 'poor' • Fulwell Station approximate 30 minute walk, Whitton Station approximate 32 minute walk, Feltham Station approximate 36 minute walk, Strawberry Hill	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Homebase, Twickenham Road, Hanworth, TW13 6EZ			
	Station approximate 37 minute walk • No Controlled Parking Zone • Public vehicular access to the site is via Twickenham Road with a second access used for deliveries/loading off Twickenham Road to the east • Total of 150 car-parking spaces on site for Homebase customers • Twickenham Road a TfL-maintained 'red route' (A305) • Site is adjacent to TfL-maintained Great Chertsey Road 'red route' (A316)		
Flood Risk	• Flood Zone 1 • Area Susceptible to Groundwater Flooding (>75% risk) • Parts of southeast of site Area Susceptible to Surface Water Flooding (1 in 1000 chance) and area near site entrance (1 in 100 chance)	**Trees**	• None • Established row of non-protected trees outside site along border with Twickenham Road.
Views	None		
Heritage Assets	None	**Access to Open Space / Nature**	• Fulwell Public Golf Course (60m south) - Metropolitan Open Land (MOL), Site of Important Nature Conservation (SINC) and Public Open Space • Glebe Gardens, Glebe Way (100m east) - Other Open Land of Townscape Importance (OOLTI)
Relevant Planning History	None.		
Description of Current Site Character	Homebase Superstore is a large hardware and retail store with associated car park, accessed north of Twickenham Road. The building is a typical 1990s purpose-built design for its type: single-storey and wide with a pitched roof and front gable. Two temporary use single-storey kiosks occupy the site to the north, which operate as vehicular glass repair services. A McDonalds drive-thru and car park occupy the site to the west. The site adjoins Great Chertsey Road to the north where boundary treatment is meshed wire fencing and concrete poles, with some overgrown greenery of low value. To the south the boundary treatment along Twickenham Road is wooden fencing.		
Neighbour Context	The surrounding area is a mix of commercial, industrial and residential uses. The north of the area is dominated by the busy Chertsey Road which is also the borough boundary with Hounslow. Immediately west of the site is the Apex Corner roundabout connecting Great Chertsey Road (A316), Hampton Road (A305) and Twickenham Road. Directly south off Apex Corner is a tyre-fitting service (134 Twickenham Road) and a retail unit adjacent to this. Neighbouring residential dwellings are two-storey in height and comprise short terraces and semi-detached pairs: Nos. 1a-c Glebe Cottages and 1 & 2 Twickenham Road to the southeast, and 1-17 [odds] Butts Crescent to the east. The rear gardens of properties fronting Butts Crescent and 1a Glebe Cottage directly abut the site. Further two-storey dwellings front Twickenham Road		

CONTEXT: Proposed Site – Homebase, Twickenham Road, Hanworth, TW13 6EZ	
	on the opposite side of the street to the south. Beyond these is Fulwell Golf Course which is designated MOL, a SINC and Public Open Space. Within these grounds is the large two-storey David Lloyd fitness centre. The site is not in a conservation area and there are no Listed Buildings or BTMs.

Vision: Proposed site - Homebase, Twickenham Road, Hanworth

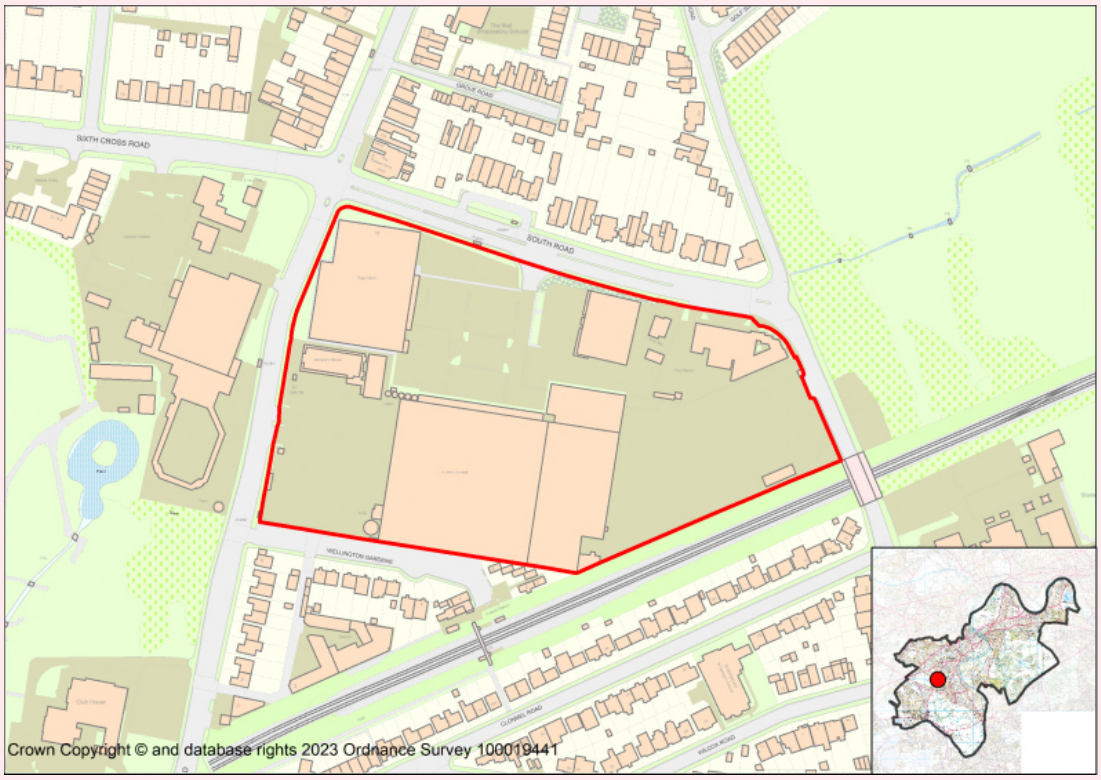
The site presents a significant opportunity to bring forward high-quality residential-led redevelopment with a flexible range of other uses, including retail, office, commercial and community/social. New development will provide improvements to the quality of the public realm with landscape design and trees. Provision of on-site car parking to London Plan standards will be expected, with an opportunity to reconfigure existing delivery/servicing arrangements to improve noise and disturbance-related amenities for neighbouring dwellings.

- **It is recognised that McDonalds is in separate ownership to the remainder of the site. Development is not dependent on the comprehensive redevelopment of the entire site, which may come forward in part, though a comprehensive redevelopment would be supported.**
- **There is a need for housing in the borough and this site is considered suitable for a substantial provision of new housing units (including a policy compliant level of affordable housing).**
- **As the site is located outside of a town centre *and defined Primary Shopping Area* ~~and defined retail frontage~~, the existing retail use is not protected. The Council expects any redevelopment to provide a range of uses, including retail, office, commercial and community/social, to meet local needs.**
- **Residential development should be sited away from Great Chertsey Road, to mitigate impact of air pollution and noise on future residents.**
- **Any redevelopment proposal should create an attractive frontage on Twickenham Road, including protection of street trees, as well as planting of new trees and improved landscaping. There is an expectation that any redevelopment will provide new on-site Public Open Space in addition to any external amenity space requirements; delivering multi-functional benefits including for nature conservation and biodiversity value as well as for health and wellbeing of future occupants and users, including surrounding communities.**
- **There is potential to increase heights and massing towards the north and northwest of the site, stepping down to respect the low-rise urban grain of existing neighbouring dwellings; having regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 19

Fulwell Bus Garage, Wellington Road, Twickenham



CONTEXT: Proposed Site – Fulwell Bus Garage, 82 Wellington Road, Twickenham, TW2 5NX			
Ward	Fulwell and Hampton Hill	**Site Area**	4.4 ha
Land ownership	Public and private	**CIL Band**	Richmond CIL: Fulwell and Hampton Hill – Low MCIL: Band 1
Existing land uses	Bus depot and associated offices (Sui Generis), ambulance station (Sui Generis), fire station (Sui Generis), supermarket, retail and associated car parking (Use Class E), car showroom (Sui Generis)		
Local Plan Place-Based Strategy	Twickenham, Strawberry Hill & St Margarets	**Urban Design Study Area**	C4 Strawberry Hill Residential
Village Plan Guidance	Character Area 5 'Fulwell Triangle', Twickenham Village Planning Guidance	**Neighbourhood Plan**	
London Plan Designations	None specified	**Type of Centre**	None – out of town centre

CONTEXT: Proposed Site – Fulwell Bus Garage, 82 Wellington Road, Twickenham, TW2 5NX			
Transport / Highways	• PTAL 3 'moderate' • Fulwell Station approximate 3 minute walk • No Controlled Parking Zone • Vehicular access via South Road and Stanley Road • Existing car park for retail customers	**Air Quality**	Air Quality Management Area
Flood Risk	• Flood Zone 1 • Area Susceptible to Groundwater Flooding (>75% risk with northern end of site 50-75% risk) • Area Susceptible to Surface Water Flooding (between 1 in 30 and 1000 chance) • Throughflow Catchment Area	**Trees**	TPO Group Area along northwestern corner of site, TPO trees on northern border, TPO tree outside site on southern boundary
Views	None		
Heritage Assets	Fulwell Bus Depot – Building of Townscape Merit (BTM)	**Access to Open Space / Nature**	• Area Poorly Provided with Public Open Space • Fulwell Public Golf Course (15m west) - Metropolitan Open Land (MOL), Site of Important Nature Conservation (SINC) and Public Open Space) • Strawberry Hill Golf Course (15m east) - MOL, SINC • Teddington Cemetery (270m southeast) - SINC, Other Open Land of Townscape Importance (OOLTI)
Relevant Planning History	None.		
Description of Current Site Character	The multi-use site is occupied by an operational TfL bus depot to the south comprising large garage and associated offices (Busways House). A supermarket and retail store are located in the northwestern corner, currently occupied by Lidl and B&Q, with large car park towards the centre. There is also a car sales / servicing & MOT garage (Citygate SEAT and Volkswagen Twickenham). In the northeast of the site are the operational Twickenham Ambulance Station and Twickenham Fire Station. Fulwell Bus Garage was formerly a tram depot built in 1902 for London United Tramways from where London's very first trolleybuses operated. Rebuilt in 1987, it has four gabled and pedimented spans, circular glazed openings at the top of each gable and a large central clock. It is a dominant feature in the area, with original red bricked garages and red bricked wall running along its boundary with Stanley Road. The site is bounded by railway lines to the south, Wellington Road to the east, South Road to the north and Stanley Road to the west. There are a number of protected trees along the northwestern corner and northern border of the site.		
Neighbour Context	The surrounding area has a varied character with a mix of commercial, industrial and residential uses. West of the site is Fulwell Golf course and retail uses, including the large Squire's Garden Centre. To the south are two-storey residential dwellings which front Wellington Gardens and face the site.		

CONTEXT: Proposed Site – Fulwell Bus Garage, 82 Wellington Road, Twickenham, TW2 5NX	
	Fronting the busy South Road to the north are residential dwellings two- to three-storeys in height. West of the site is Strawberry Hill Golf Club which includes some retail development.

Vision: Proposed site - Fulwell Bus Garage

The Council would support a redevelopment of the site which protects the BTM bus garage and its setting; and retains the bus garage operation and social infrastructure use on site. Additional acceptable uses on site include residential with a policy-compliant level of affordable housing (in line with public sector land disposal). Development will provide opportunities for improved permeability through the site, including to Fulwell Station, as well as improved public realm with enhanced biodiversity and landscaping.

- **The existing bus garage use should be retained to safeguard capacity for efficient and sustainable operation of the bus network, unless it is demonstrated that it is operationally no longer needed or enhanced reprovision has been made elsewhere in a convenient and accessible alternative location.**
- **The ambulance and fire station uses will be retained unless surplus to requirements. 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 policy compliant levels of affordable housing and on-site car parking be considered as a potential redevelopment option.**
- **~~As t~~*T*he site is located outside of a town centre *and defined Primary Shopping Area* ~~and defined retail frontage, the existing retail use is not protected~~. The Council expects any redevelopment to provide a range of uses, including retail, office, commercial and community/social, to meet local needs.**
- **There is a need for housing in the borough and this site is suitable for a substantial provision of new housing units, including a policy compliant level of affordable housing~~)~~. In line with the London Plan where there is publicly owned land, the Council expects that grant funding opportunities are explored to increase affordable housing provision above what is expected in policy.**
- **The BTM will need to be retained and its setting protected and enhanced.**
- **There is opportunity to open up the site at the south to improve pedestrian and cycling routes to Fulwell Station. Any proposals for placemaking at this part of the site would need to be designed in a way appropriate to the wider context; including protecting the openness and character of designated open land, and the low-rise urban grain of houses on Wellington Gardens, and protecting the amenities of these occupiers.**
- **Permeability through the site should be improved, in particular for active forms of travel, such as walking and cycling. Development should seek to improve the public realm through enhanced landscaping and biodiversity. There is an expectation that any redevelopment provides new on-site Public Open Space in addition to any external amenity space requirements, delivering multi-functional benefits including for nature conservation and biodiversity value as well as for health and wellbeing of future occupants and users, including surrounding communities.**
- **Development, including heights, design and massing, should have regard to the design objectives set out in the relevant character area profiles in the Urban Design Study and Village Planning Guidance.**
- **It is recognised that the site is of mixed ownership. Any developer would be expected to approach and work in partnership with all landowners as part of a comprehensive redevelopment of the site. However, it is recognised that the site may come forward in**

part, which would also be supported subject to other requirements being met as identified in the Site Allocation above.

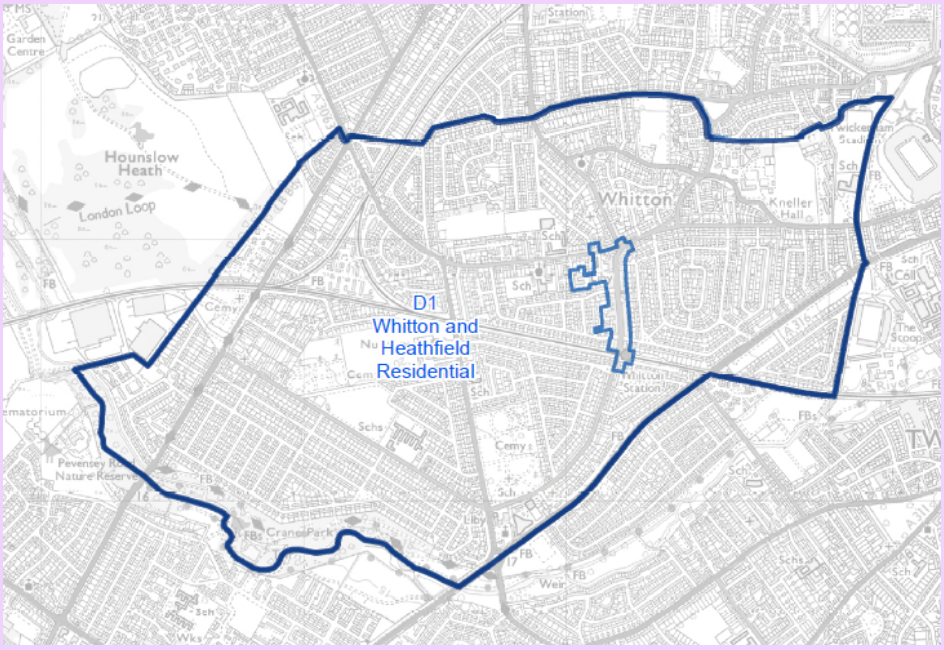
Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

9 Place-based Strategy for Whitton & Heathfield

Policy PBS4 Place-based Strategy for Whitton & Heathfield

Area Profile

The Whitton & Heathfield area encompasses Whitton and Heathfield Residential and Whitton High Street. These are character areas D1 and D2 in the Urban Design Study.



Whitton and Heathfield is slightly isolated from the rest of the borough as a result of heavy traffic on Chertsey Road (A316) and by the River Crane. The residential areas are primarily large estates of inter-war terraced or semi-detached houses set back from the street with hedgerows.

Whitton has a unique 1930s High Street, whilst the Heathfield area has less of a focus with few focal points.

Whitton town centre forms a focus of retail activity and is identified as a district centre in the borough's centre hierarchy and the London Plan (see section 6 of the Plan). However, the London Plan recognises it has low commercial growth potential. There are also three smaller shopping parades, around Hanworth Road, Nelson Road and Powder Mill Lane, serving day-to-day needs. Whitton centre also plays a particular role for visitors to Twickenham Stadium.

The River Crane and Crane Park provide a natural environment, enclosed from the surrounding housing estates by mature vegetation. This is continued through several open spaces including Heathfield Recreation Ground, Murray Park and Twickenham Cemetery. Hounslow Heath separates the area from further development to the west.

A striking contrast to its surrounds is the Grade II listed Kneller Hall and gardens, which was built in the early 18th Century as a large house near to the former village centre and then home to the Royal Military School of Music for over 150 years (until Summer 2021).

Whitton is less accessible by public transport in comparison to Richmond and Twickenham.

As part of the Urban Design Study consultation in 2021, feedback was invited on what people value in their area. Character area D1 Whitton and Heathfield Residential scored poorly across all aspects, with green and open spaces scoring the highest. Character area D2 Whitton High Street was scored highest for shops and restaurants, while valuing heritage, tranquillity, green spaces and vibrancy received slightly lower scores.

Overall strategy

Overall, the Urban Design Study recognises that Whitton and Heathfield Residential D1 has having a medium sensitivity to change, with some areas of high sensitivity, including listed buildings and open spaces. The strategy is to improve the character of this area, with future new development using historic references, as well as taking opportunities to develop new character and sense of place. Overall, Whitton High Street D2 has a medium sensitivity to change, owing to the consistency in built vernacular and scale of buildings along the High Street, and the strategy is to conserve its uniformity and functionality and enhance its strength of character and identity. The Urban Design Study contains design guidance for each character area.

Other initiatives

The Council works with 'Love Whitton', by Whitton Business Association and the Town Centre Manager. Love Whitton actively promote Whitton businesses, and in the community they organise and fund local events that attract people into the High Street, including an annual St Georges Day Parade.

Vision

The vision for Whitton & Heathfield is to retain and reinforce the established character of the area and ensure the provision of community facilities and transport links. This includes protecting the 1930s architecture, within both Whitton High Street and in the surrounding residential areas and encouraging village events such as markets or regular cultural events, in the High Street or in other suitable areas such as parks and open spaces.
There are some development sites that provide the opportunity to develop new character, including ensuring Kneller Hall lies at the heart of the Whitton community, through a viable long-term use protecting its heritage significance and opening up the site to include community uses along with a new public park.

Policy

Future development in this place is expected, where relevant, to:

- **Conserve the consistency and suburban quality of the area, retaining and restoring front gardens and boundary walls as an important characteristic that provides consistency to the streetscene.**

- **Consider opportunities to reduce the dominance of cars and promote active travel; improve permeability and create space for pedestrians; introduce measures to improve cycling safety and air quality.**
- **Embrace the Crane River valley character in adjoining urban spaces by implementing appropriate planting palettes and wayfinding.**
- **Contribute to enhancing the sense of arrival and quality of the public realm at Whitton Station, identifying opportunities for art, wayfinding, and public realm.**
- **Contribute to opportunities to provide space for dwelling and encourage village events such as markets or regular cultural events in the High Street or in other suitable areas such as parks and open spaces; including temporary pedestrianisation of roads to enable "spill-out" from restaurants, cafés and pubs, and restoring and maintaining street trees and planters.**
- **In areas deficient in access to Public Open Space, consider opportunities to improve access to existing spaces; either through design and public realm improvements, or where opportunities arise, provide new publicly accessible open space. Open spaces that are currently not publicly accessible, such as Kneller Hall, will be encouraged to make them available for public access and use.**

Within the town centre boundary, the Telephone Exchange (Site Allocation 20) provides a redevelopment opportunity to provide for employment and social infrastructure use, increasing permeability to the High Street, with some opportunity in the identified mid-rise zone in Whitton Town Centre in accordance with Policy 45 Tall and Mid-Rise Building Zones. There is an opportunity to create a sense of identity through future landmark developments, enhanced public realm, and gateway features at either end of Whitton High Street. Shopfronts, including signage and canopies, should be in keeping with the 1930s character, and original shopfronts should be retained, reinstated and enhanced (in accordance with the shopfront guidance in the Whitton and Heathfield Village Planning Guidance SPD).

At Kneller Hall (Site Allocation 21) there is an opportunity to create a mixed use "quarter" bringing new homes, employment and community uses, including in the identified mid-rise zone in accordance with Policy 45 Tall and Mid-Rise Building Zones. This will be set within the protected landscape and heritage significance of the Grade II listed Hall and MOL, with the opportunity to open up community access, including a new public park offering recreation and leisure as well as informal play and wildlife habitats.

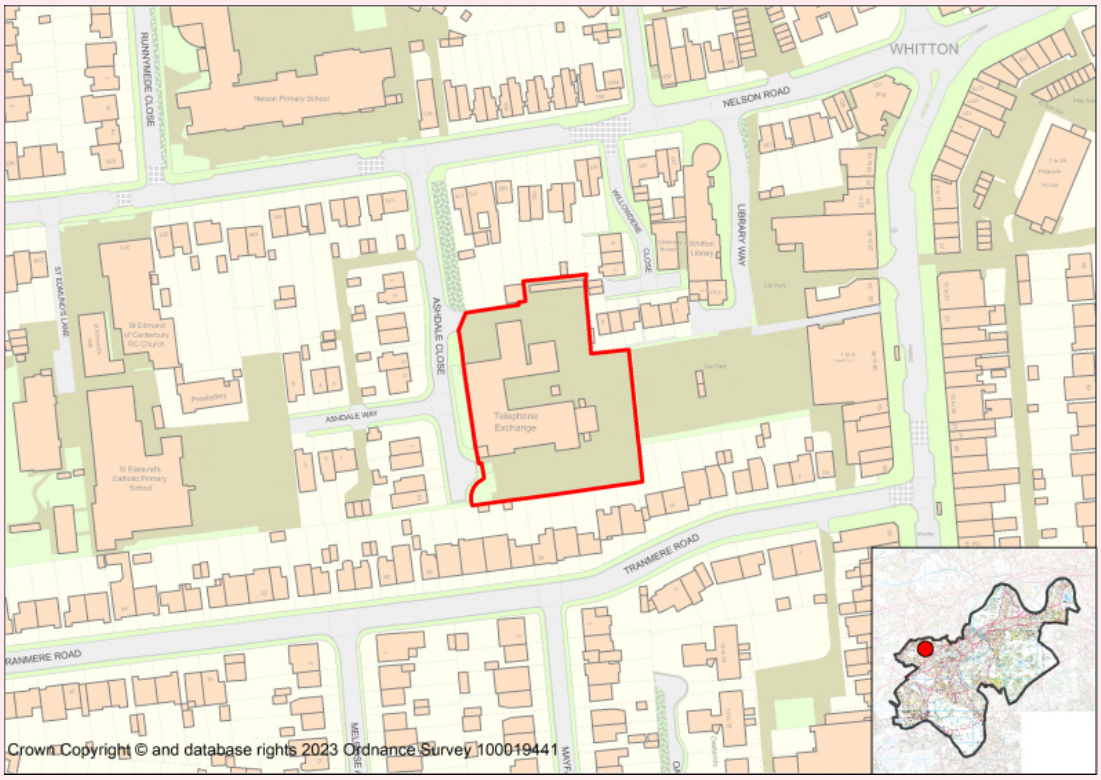
At Whitton Community Centre (Site Allocation 22) there is an opportunity to reprovide community facilities (the existing ~~day~~ *community* centre and pharmacy) with affordable housing above, to provide modern facilities for the elderly and wider local community.

See details in the Site Allocations within this area:

- Telephone Exchange, Ashdale Close, Whitton
- Kneller Hall, Whitton
- Whitton Community Centre, Percy Road, Whitton

Statement Site Allocation 20

Telephone Exchange, Ashdale Close, Whitton



CONTEXT: Proposed Site – Kneller Hall Telephone Exchange, Ashdale Close, Whitton, TW2 7BE			
Ward	Whitton	**Site Area**	0.14ha
Land ownership	Private	**CIL Band**	Richmond CIL: Whitton – Low MCIL: Band 1
Existing land uses	Telephone exchange (sui generis) and associated office use		
Local Plan Place-Based Strategy	Whitton & Heathfield	**Urban Design Study Area**	D2 Whitton High Street
Village Plan Guidance	Character Area 1 'High Street Whitton', Whitton & Heathfield Village Planning Guidance	**Neighbourhood Plan**	
London Plan Designations	Brownfield Site Register	**Type of Centre**	Whitton ~~Main~~ *Town* Centre Boundary
Transport / Highways	• PTAL 2 'poor' • Whitton Station approximate 4 minute walk • No Controlled Parking Zone	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Kneller Hall Telephone Exchange, Ashdale Close, Whitton, TW2 7BE			
Flood Risk	• Flood Zone 1 • Area Susceptible to Groundwater Flooding (>75% risk) • Area Susceptible to Surface Water Flooding (1 in 100 and 1 in 1000 chance)	**Trees**	None
Views	None		
Heritage Assets	None on site Adjacent to site: • Buildings of Townscape Merit (BTMs) - 161-167 [odds] Nelson Road (20m north), 38-48 & 34-36 High Street (65m east)	**Access to Open Space / Nature**	• Area Poorly Provided with Public Open Space • St Edmunds School grounds (150m west) - Other Open Land of Townscape Importance (OOLTI)
Relevant Planning History	None		
Description of Current Site Character	The detached telephone exchange fronts Ashdale Close to the east and is two to four storeys with flat roof. It appears to date from the 1960s/70s. The building is enclosed by hard surfacing and on-site car parking. There is an Article 4 Direction which removed permitted development rights for change of use from Use Class E to residential (C3).		
Neighbour Context	The immediately surrounding area is suburban and predominantly low-rise in nature, comprising two-storey interwar semi-detached dwellings. The site borders the rear gardens of houses fronting Nelson Road to the north, Tranmere Road to the south and Willowdene Close to the east. Directly to the east is a Council car park, accessed via Library Way which runs north to the High Street. Here the area becomes more mixed and commercial in nature, where heights range up to three storeys. Whitton Library fronts the west of Library Way.		

Vision: Proposed site - Telephone Exchange, Ashdale Road, Whitton

If the Telephone Exchange is declared surplus to requirements, there is an opportunity for comprehensive redevelopment of the site. Appropriate land uses include employment and social infrastructure or other appropriate ~~main~~ *town* centre uses. Any development should explore provision of employment space, such as offices or other commercial, uses, before a mixed-use scheme with housing would be considered, including policy compliant affordable housing.

- **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 town centre.**
- **There is an expectation that redevelopment provides employment space in this town centre boundary location, particularly offices which could be in the form of flexible shared workspaces.**
- **Any redevelopment proposal should provide for employment and social infrastructure or other appropriate ~~main~~ *town* centre uses.**
- **Only if other ~~main~~ *town* 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 policy compliant affordable housing, be considered as a potential redevelopment option.**

- **There is opportunity for a comprehensive redevelopment of the site. Development should ensure that the site establishes a positive relationship with the surrounding area, including car park, library and High Street. This should include increased permeability from the site for pedestrians and cyclists through to the car park and to the High Street.**
- **The Urban Design Study identifies a mid-rise building zone (5-6 storeys) in Whitton Town Centre set back from the High Street, which much of this site falls within, with potential for development to improve the character of the town centre, in accordance with Local Plan Policy 45 Tall and Mid-Rise Building Zones.**
- **Design objectives and general guidance relating to the local character of the area, which the redevelopment of this site should have regard to, is set out in the Urban Design Study in the character area profile and design guidance for D2 Whitton High Street and the Whitton and Heathfield Village Planning Guidance SPD.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 21

Kneller Hall, Whitton

CONTEXT: Proposed Site – Kneller Hall, Kneller Rd, Whitton, Twickenham, TW2 7DN			
Ward	Whitton	**Site Area**	9.72 ha
Land ownership	Private (previously in public sector ownership)	**CIL Band**	Richmond CIL: Whitton – Low MCIL: Band 1
Existing land uses	Formerly home of the Royal Military School of Music (Use Class F1). The site has temporary permission for film-making.		
Local Plan Place-Based Strategy	Whitton & Heathfield	**Urban Design Study Area**	D1 Whitton & Heathfield Residential
Village Plan Guidance	Character Area 6 'Kneller Hall', Whitton & Heathfield Village Planning Guidance	**Neighbourhood Plan**	
London Plan Designations	Brownfield Site Register	**Type of Centre**	None – outside town centre
Transport / Highways	• PTAL 2 'poor' • Whitton Station approximate 10 minute walk • Controlled Parking Zone: R – Twickenham Events	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Kneller Hall, Kneller Rd, Whitton, Twickenham, TW2 7DN			
Flood Risk	• Flood Zone 1 • Critical Drainage Area • Area Susceptible to Groundwater Flooding (>75% risk)	**Trees**	Significant number of trees on site subject to TPO including some TPO Area Groups
Views	None		
Heritage Assets	Archaeological Priority Zone – Whitton Listed Building – Kneller Hall (Grade II), boundary walls and gatepier (Grade II), coach house (curtilage Grade II) Buildings of Townscape Merit (BTMs) Adjacent to site: • BTM - Duke of Cambridge Public House, Kneller Road (14m southwest of site)	**Access to Open Space / Nature**	• Area Poorly Provided with Public Open Space • ~~Candidate site for designation as a~~ Site of ~~Important~~ *Importance for* Nature Conservation ~~(subject to Regulation 19 Local Plan consultation)~~ • Kneller Chase Bridge (eastern part of site – Metropolitan Open Land (MOL) • South of Kneller Road (5m south of site) (150m west) - Other Open Land of Townscape Importance (OOLTI)
Relevant Planning History	• 22/0344/LBC - Listed Building consent for internal works at Kneller Hall associated with investigations, opening up and enabling works to inform future development proposals. - Granted 07/07/2022 • 22/1157/FUL & 22/1158/LBC - Temporary use of existing buildings and land for film-making purposes. - Granted 13/06/2022 • There is a live full planning application and Listed Building consent under consideration (22/3004/FUL and 22/3005/LBC) for: demolition of the existing modern buildings; conversion of Kneller Hall and associated buildings to a day school; internal/external alterations to Kneller Hall including demolition and rebuilding of west wing single-storey extension; new purpose-built buildings for teaching space, indoor sports facilities, sporting pavilion and forest school building; alterations to existing playing fields to include an all-weather pitch, flood lighting to existing tennis courts and returfing; new access from Whitton Dene; associated works. The application has been subject to pre-application advice as part of a Planning Performance Agreement with the Local Planning Authority.		
Description of Current Site Character	Formerly a private estate with a large house in the centre, the highly sensitive site was home to the Military School of Music for over 150 years until the Ministry of Defence released it in 2016. The site was sold to Dukes Education Group, who run a Twickenham-based public school and intend to make the Kneller Hall site the new home for their Radnor House School. There is a live planning application under consideration for their plans. The main building is Grade II Listed, largely dating from 1848 and neo-Jacobean in style. Some buildings were added in the grounds over the years in connection with the music school use, including the Band Room which is a BTM. The coach house, now a guard room, is curtilage Grade II listed and the boundary walls are listed in their own right. Kneller Hall has undergone many changes throughout its history, though whilst the interior has been much altered, the exterior has largely retained its 1848 appearance; the west wing is thought to be one of the building's oldest surviving parts and has undergone some alteration to its east elevation. The imposing main front elevation faces Kneller Road and lends considerable character to this part of Whitton. The site includes extensive grounds designated as MOL, which include playing fields, with a significant number of protected trees. *The grounds are also a designated Site of Importance for Nature Conservation, the majority of which is acid grassland, with a proportion towards the south identified as irreplicable.* There are several vehicular access points: two entrances from Whitton Dene and Kneller Road to the west and an additional entrance from the south, also from Kneller Road. On-site parking is provided and has previously provided support for Twickenham Stadium and the Rugby World Cup. A Masterplan Supplementary Planning Document (SPD) for the Kneller Hall site was adopted in 2020.		

CONTEXT: Proposed Site – Kneller Hall, Kneller Rd, Whitton, Twickenham, TW2 7DN	
Neighbour Context	The site is bound by Kneller Road to the south and west, Whitton Dene to the west, Kneller Gardens and Ambleside Close to the north and Duke of Cambridgeshire Close to the east. The Duke of Cambridge pub opposite the side entrance to the site is a BTM and the original village of Whitton lies to the west of the site on Nelson Road; several of the buildings in the road are BTMs. The surrounding is area is predominantly residential and low rise suburban in character, though 180m to the east is Twickenham Station. Immediately east is Chase Bridge Primary School and Twickenham Playing Fields, both of which form part of the Kneller Chase Bridge designated MOL. Immediately north is Whitton Tennis Club.

Vision: Proposed site - Kneller Hall

Appropriate land uses include residential (including affordable housing), educational use, employment and employment-generating uses, including offices, as well as social infrastructure uses, such as health and community facilities. The Council will expect the playing fields to be retained and the provision of high quality public open spaces and public realm, including a new publicly accessible green and open space available to both existing and new communities, together with links through the site to integrate the development into the surrounding area.

- **Future development would be expected to demonstrate how the vision set out in the Kneller Hall Masterplan SPD 2020, and requirements above, are being met.**
- **It is expected that the new site owners will provide educational uses but the Council would also support employment-generating uses including lower-cost units for small businesses, the voluntary sector, creative industries and scientific and technical businesses including green technology.**
- **Social infrastructure and community uses, such as leisure, sport and health uses, should be incorporated and the need for such facilities should be fully explored.**
- **There is potential for a new residential 'quarter' to be created towards the west of the site.**
- **The Council will seek a policy-compliant level of affordable housing as part of any residential scheme, in line with public sector land disposal.**
- **There is opportunity, as set out in the Kneller Hall SPD and Urban Design Study, for the centre of the residential area to accommodate building heights of 4-5 storeys tapered down to 2-3 storeys on the boundaries. Any proposal in the area identified as a mid-rise building zone would be assessed against Local Plan Policy 45 Tall and Mid-Rise Building Zones.**
- **Any redevelopment proposal for the whole site will require the restoration and enhancement of the listed Kneller Hall. The reuse of this historic building offers an excellent opportunity to ensure the site incorporates and promotes a cultural and historical legacy of the 'home of military music'.**
- **Any development should be sensitive to the historic building; respond positively to the setting of the heritage asset and the site's setting within the historic core of Whitton; and ensure that any proposal integrates well within the existing surrounding area and local Whitton community.**
- **The design of any residential area should seek to create active frontages along Whitton Dene and Kneller Road. The layout should be designed to encourage walking and cycling and create a visual and physical link into the existing community.**
- **It is expected that the existing playing fields will be retained and where possible upgraded, such as ancillary facilities including changing facilities, to support the use of the playing**

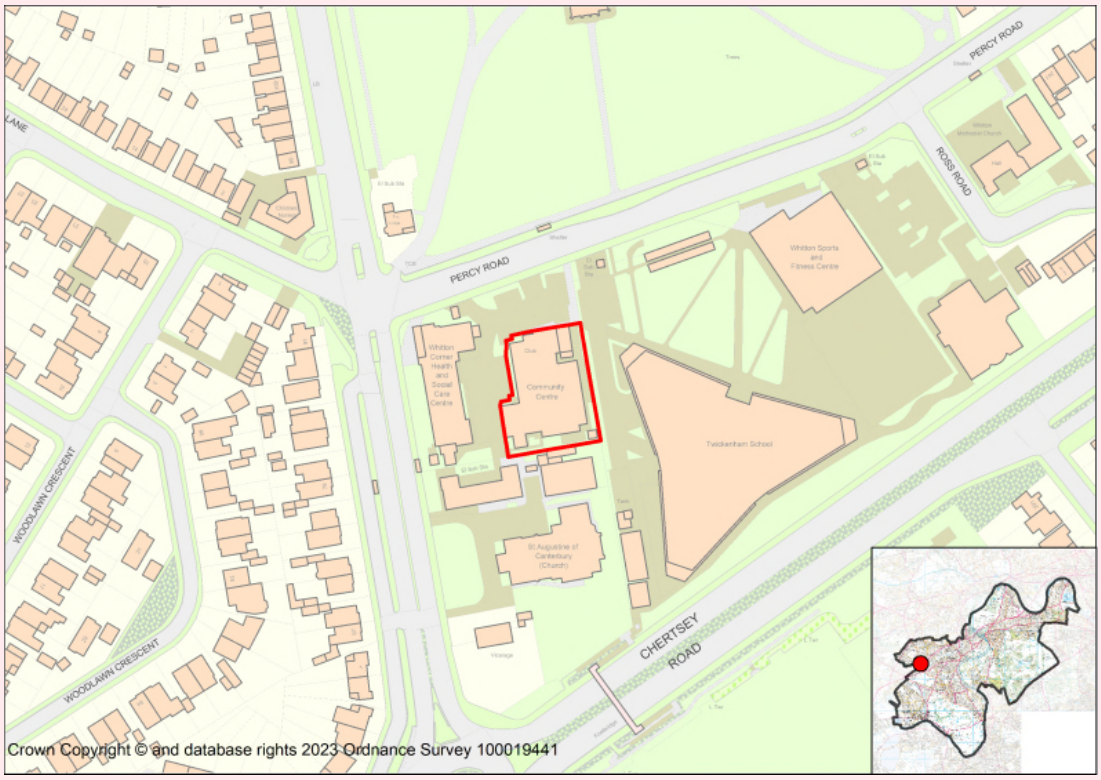
fields~~;~~, provided that any existing ecological benefits and the openness and character of the MOL is ~~retained~~ *protected*, and where possible enhanced. There is an expectation that any redevelopment proposal would improve the character and openness of the designated open land *and protect the ecological value of the SINC in accordance with Policy 39*. Development in the MOL itself ~~would~~ *is* not ~~be~~ supported, though there may be an opportunity to consolidate and re-provide the current built footprint within the MOL in a new building, in compliance with Local Plan Policy 35 and the requirements of the NPPF, subject to scale, massing and impact on character and openness.

- **Any redevelopment of the scheme should provide ecological enhancement through the creation of an east-west habitat corridor.**
- **Design objectives and general guidance relating to the local character of the area, which the redevelopment of this site should have regard to, is set out in the Kneller Hall SPD and accompanying Heritage Assets Assessment and the relevant character area profiles and design guidance in the Whitton and Heathfield Village Planning Guidance SPD and Urban Design Study.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 22

Whitton Community Centre, Percy Road, Whitton



CONTEXT: Proposed Site – Whitton Community Centre, Percy Road, Whitton, Twickenham, TW2 6JL			
Ward	Heathfield	**Site Area**	0.14 ha
Land ownership	Public	**CIL Band**	Richmond CIL: Heathfield – Low MCIL: Band 1
Existing land uses	Community centre (Use Class F2) and local pharmacy (Use Class E(e))		
Local Plan Place-Based Strategy	Whitton & Heathfield	**Urban Design Study Area**	D1 Whitton & Heathfield Residential
Village Plan Guidance	Character Area 9 'Bishop Perrin Primary School', Whitton & Heathfield Village Planning Guidance	**Neighbourhood Plan**	
London Plan Designations	None specified	**Type of Centre**	None – outside town centre
Transport / Highways	• PTAL 2 'poor' • Whitton Station approximate 10 minute walk • No Controlled Parking Zone	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Whitton Community Centre, Percy Road, Whitton, Twickenham, TW2 6JL			
Flood Risk	• Flood Zone 1 • Area Susceptible to Groundwater Flooding (>75% risk)	**Trees**	On-site trees bordering Percy Road. None protected.
Views	None		
Heritage Assets	Adjacent to site: • Building of Townscape Merit – Church of St Augustine of Canterbury, Hospital Bridge Road (20m south of site)	**Access to Open Space / Nature**	• Twickenham Cemetery (35m north of site) ~~(150m west)~~ - Other Open Land of Townscape Importance (OOLTI), Site of Importan~~t~~*ce for* Nature Conservation (SINC) ~~• There is a lively and attractive local shopping centre at Kew Gardens Station… there are also local parades at Kew Green and Sandycombe Road which provide for top-up shopping… the strategy for this area is to conserve the character, whilst enhancing existing features where appropriate (junction of Percy Road) (75m northwest) - OOLTI~~ • Crane Park East and Lincoln Fields sports pitches (100m south) - Metropolitan Open Land (MOL)
Relevant Planning History	• 13/0479/FUL - Part change of use of building from community centre (D1) to pharmacy (A1) and creation of shopfront. - Granted 30/05/2013		
Description of Current Site Character	Whitton Community Centre is a ~~part~~ single~~-, part two-~~storey standalone building accessed from the south side of Percy Road, with a car park to the front of the property. The community centre is run by Whitton Community Association and offers a range of activities and space for the community, such as keep fit, health, dance, English classes, music tuition, arts clubs, support groups and activities/services aimed at women, children and older people. Whitton Corner Pharmacy is co-located on site, which has more recently acted as a NHS Covid-19 vaccination centre. It too is a valued community service that serves the local population.		
Neighbour Context	The site forms one part of a parcel of land east of the junction of Percy Road/Hospital Bridge Road, bordered by Percy Road to the north, Hospital Bridge Road (B358) to the west Chertsey Road (A316) to the south and Ross Road to the east. Within this parcel is a cluster of different uses all serving the local community. To the west of the community centre is Whitton Corner, a three-storey health and social care centre. To the south is the one- to two-storey Homelink Day Respite Care Centre, a substation, a single-storey porta-building whose use is not clear, and the locally listed St Augustine of Canterbury Church and its vicarage. East of the site is the newly-built Twickenham School site, comprising three buildings ranging between one and three storeys modern buildings, one of which also contains the Whitton Sports and Fitness Centre. On the opposite side of Percy Road to the north is Twickenham Cemetery, which is designated OOLTI.		

CONTEXT: Proposed Site – Whitton Community Centre, Percy Road, Whitton, Twickenham, TW2 6JL	
	The wider surrounding area is predominantly residential in nature and is low density two-storey in character.

Vision: Proposed site - Whitton Community Centre

Proposed redevelopment will only be acceptable if the current community use is adequately reprovided, with the reprovision of the pharmacy. Only if reprovision of these uses has been provided then an affordable housing scheme can be explored on the upper levels of any redevelopment.

- ***Given the importance of the community use and the services it provides, any redevelopment of the site would need to ensure the adequate reprovision of this use.*** **Local Plan Policy 49 Social and Community Infrastructure proposes that should a scheme come forward for redevelopment or change of use to 100% genuinely affordable housing, in accordance with Policy 11 Affordable Housing in terms of mix, tenure and affordability, then it would not need to be considered for alternative social infrastructure use nor marketing evidence submitted. In those circumstances, a wholly affordable housing scheme would be supported. However, on this site the Council is seeking affordable housing with community/social infrastructure, due to the need to reprovide the existing use.**
- ***It is recognised that there are a range of social and community uses in operation in the immediate area.*** **Redevelopment of the site should explore opportunities for complementary and greater joined-up services with neighbouring community uses.**
- **Future development should be sympathetic to the adjacent areas of designated open land and protect their openness and character and, where relevant, their ecological value.**
- **Any development proposal should not cause harm to the setting of the BTM St Augustine's Church.**
- **The site is located within a cluster of 'larger' buildings and the Urban Design Study recognises there is potential, as a mid-rise building zone, for a proposal to be assessed against Local Plan Policy 45 Tall and Mid-Rise Building Zones, provided it has regard to the sensitive location adjacent to BTMs, OOLTI and MOL.**
- **Design objectives and general guidance relating to the local character of the area, which the redevelopment of this site should have regard to, is set out in ~~the Kneller Hall SPD and accompanying Heritage Assets Assessment and~~ the relevant character area profiles and design guidance in the Whitton and Heathfield Village Planning Guidance SPD and Urban Design Study.**

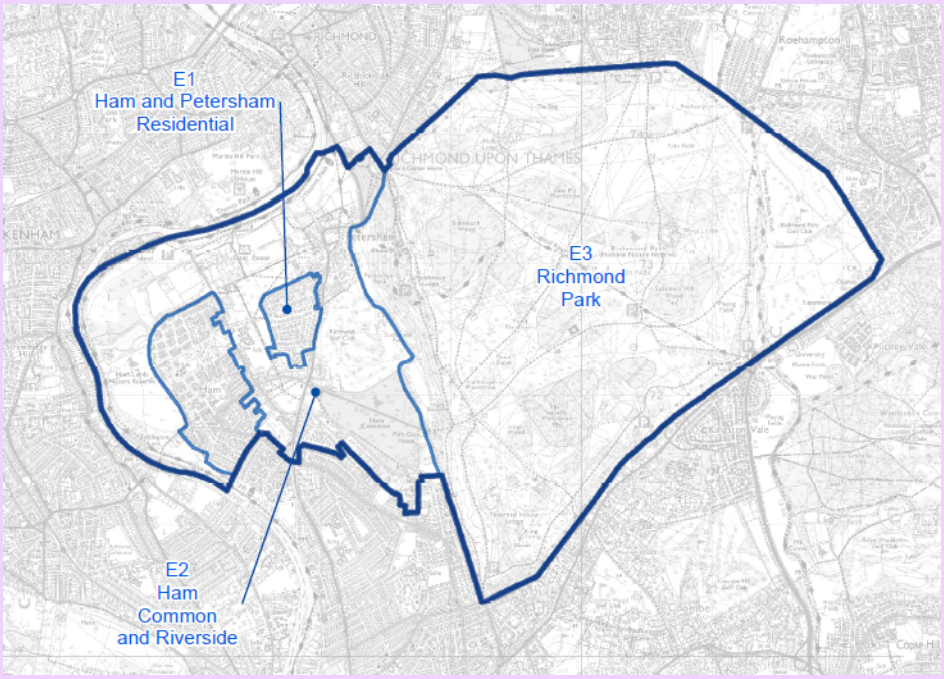
Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

10 Place-based Strategy for Ham, Petersham & Richmond Park

***Policy PBS5* Place-based Strategy for Ham, Petersham & Richmond Park**

Area Profile

The Ham, Petersham & Richmond Park area encompasses Ham and Petersham Residential, Ham Common and Riverside, and Richmond Park. These are character areas E1, E2 and E3 in the Urban Design Study.



The area is defined by its setting on a bend in the River Thames, providing an important element within the Arcadian Thames landscape, and broad belt of open land, including Petersham and Ham Commons. The National Trust-owned Ham House and Richmond Park are national landmarks and visitor attractions. This area includes the designated strategic view from King Henry VIII's Mound to St Paul's Cathedral. In addition, the area contains the only view in England to be protected by an Act of Parliament; The Richmond, Petersham and Ham Open Spaces Act (1902) prevents development of the land on and below Richmond Hill to protect the unique and distinctive foreground views that it provides to the west and south; (see further details in Policy 27 Views and vistas). A key feature of this place is Richmond Park, which has protected status as an important habitat for wildlife; it is a European Special Area of Conservation (SAC) and a National Nature Reserve (NNR) as well as London's largest Site of Special Scientific Interest (SSSI).

Some parts of this place are not well-served in terms of local shopping facilities and parts have been amongst the most relatively disadvantaged in the borough. Ham Parade, identified as a local centre in the borough's centre hierarchy (see section 6 of the Plan), is a well-used parade of shops and local services, along with other local clusters of shops, schools and local services across the area. The majority of residents work outside of the area.

A large part of this place is covered by the Ham & Petersham Neighbourhood Plan was adopted in January 2019, following a successful referendum result. The Neighbourhood Plan sets out the history of the area and its development, how the area physically relates to its neighbours and describes the current character. It recognises the range of social groups living in the area is a distinctive and valued characteristic in terms of different ages and social groups. The description of the neighbourhood area as 'semi- rural' has been used to describe the setting of the settlements of Ham and Petersham within

substantial areas of open and undeveloped land, as a distinctive and valued feature of the area, providing relative isolation from more urban areas of London. It recognises the area is quite isolated, with few vehicular access points and limited bus routes, with more options to access on foot or by cycle.

Relationship of the Neighbourhood Plan with the Local Plan:

Both the Local Plan and Neighbourhood Plan should be read together and used to guide and shape development in the locality. The Neighbourhood Plan was prepared in the context of the then emerging 2018 Local Plan, and all its policies were considered to be compliant with the Local Plan. In essence, the Neighbourhood Plan reflects and responds to the unique characteristics and planning context of the Ham and Petersham Neighbourhood Area, thereby adding an additional level of detail to the Local Plan. There are a number of policy areas within the Neighbourhood Plan that exceed the requirements of the 2018 Local Plan; where this was justified through local evidence, such as the higher levels of cycle storage due to the poor accessibility of this part of Richmond borough. The Policy on Open Spaces also goes beyond Local Plan requiring that any development adjacent to open space should not detrimentally impact on the value of the green space; this is in response to the distinctiveness of the area and the large amounts of high-quality open spaces.

As part of the Urban Design Study consultation in 2021 feedback was invited on what people valued in their area. Character area E1 Ham and Petersham Residential was rated highly for attractiveness, valuing heritage, tranquillity, green spaces and community spirit. For character area E2 Ham Common and Riverside scores varied across the different features, with green spaces receiving the highest score and other highly scored features included tranquillity, attractiveness, and community spirit. C aracter area E3 Richmond Park received the highest possible score for its attractiveness, and it was also scored very highly for valuing heritage, tranquillity, and green and open spaces.

Overall strategy

Overall, the Urban Design Study recognises Ham & Petersham Residential (E1) has townscape of medium quality, with the prevailing sense of spaciousness and “village” character increasing the sensitivity of the area; and Petersham having a high sensitivity to change. It recognises Ham Common and Riverside (E2) as having high sensitivity to change, due to openness and visual aesthetic of the area. Richmond Park (E3) is recognised as having high sensitivity to change, with the high value and susceptibility of the areas meaning that significant change is unlikely to be appropriate.

For Ham and Petersham Residential (E1) the strategy is to improve the character of the area by taking opportunities to create a sense of place, enhancing the existing parades and developing a well-defined neighbourhood centre. The functionality and biodiversity value of the area’s open spaces, and the quality of its public realm, will also be improved. For Ham Common and Riverside (E2) and Richmond Park (E3) the strategy is to conserve. The Urban Design Study contains design guidance for each character area and for Richmond’s Riverside.

Other initiatives

The Neighbourhood Forum comprises a large group of active residents, business representatives and representatives of local community services and voluntary groups, whose purpose is to further the social, economic and environmental well-being of the area, including through preparing and monitoring the Neighbourhood Plan.

Initial feasibility has been carried out for a new pedestrian and cycle bridge in the borough, with the best location found to be connecting Ham to Twickenham; with another suitable location identified as Ham to Radnor Gardens in Strawberry Hill. As set out in the Council's Third Local Implementation Plan, additional studies are required to determine the economic feasibility of the bridge, and funding for the bridge must still be found.

Vision

As set out in the adopted Neighbourhood Plan, the vision for Ham & Petersham is to build on the identity of Ham and Petersham as a distinct and sustainable mixed community, giving great opportunities to live and work within a semi–rural historic landscape.

The vision for a sustainable community is that, whenever viable, residents will have access to education, shopping, working, cultural and other opportunities within Ham and Petersham, to foster a greater sense of belonging and identity; encouraging an increasing proportion of local journeys to be by foot or bicycle by creating a network of cycle/walking routes accessible to a range of ages and good public transport.

The Neighbourhood Plan identifies the key opportunity for redevelopment at Ham Close, to provide modern housing and community facilities in keeping with the character of the area.

Richmond Park, an area of national and international importance for wildlife conservation and rich heritage, will be protected.

Policy

Future development in this place is expected, where relevant, to:

- **Enhance existing local centres and shopping parades, to improve the appearance and attractiveness through appropriate shopfronts and signage, along with directional signage, lighting, seating, public art, space for community events and soft landscaping including at Ham Parade (according with Neighbourhood Plan Policy O1) and St Richard's Square (according with Neighbourhood Plan Policy O2).**
- **Conserve and enhance the network of green spaces and the public realm, improve the riverside environment, and improve legibility to better connect open spaces to the townscape, including around Ham Common/Ham House Estate.**
- **Contribute to improving transport infrastructure, including improvements to support bus use and the accessibility of existing ferry services (according with Neighbourhood Plan Community Proposal 1).**
- **Contribute to reducing the dominance of vehicle traffic along main roads and parades, and provide more space for and improve visibility, accessibility and connectivity for pedestrians and cyclists.**
- **Contribute to enhancement of Ham Village Green through the provision of soft landscaping, planting, seating and appropriate play and exercise equipment (according with Neighbourhood Plan Community Proposal 5).**

At Ham Close (Site Allocation 23, Neighbourhood Plan Policy O3), the regeneration proposed is an opportunity for redevelopment to create a landmark scheme, creating a sense of identity, providing modern homes and community facilities in the identified mid-rise zone, in accordance with Policy 45 Tall and Mid-Rise Building Zones. There is also an opportunity if Cassel Hospital is declared surplus to requirements (Site Allocation 24, Neighbourhood Plan Policy O5) for conversion to community facilities. The Neighbourhood Plan seeks to make the most of small

sites that are currently under-used or redundant and have been previously developed, while protecting back land garden sites from development, as large gardens and low density housing are characteristic of the neighbourhood area.

Other policy initiatives

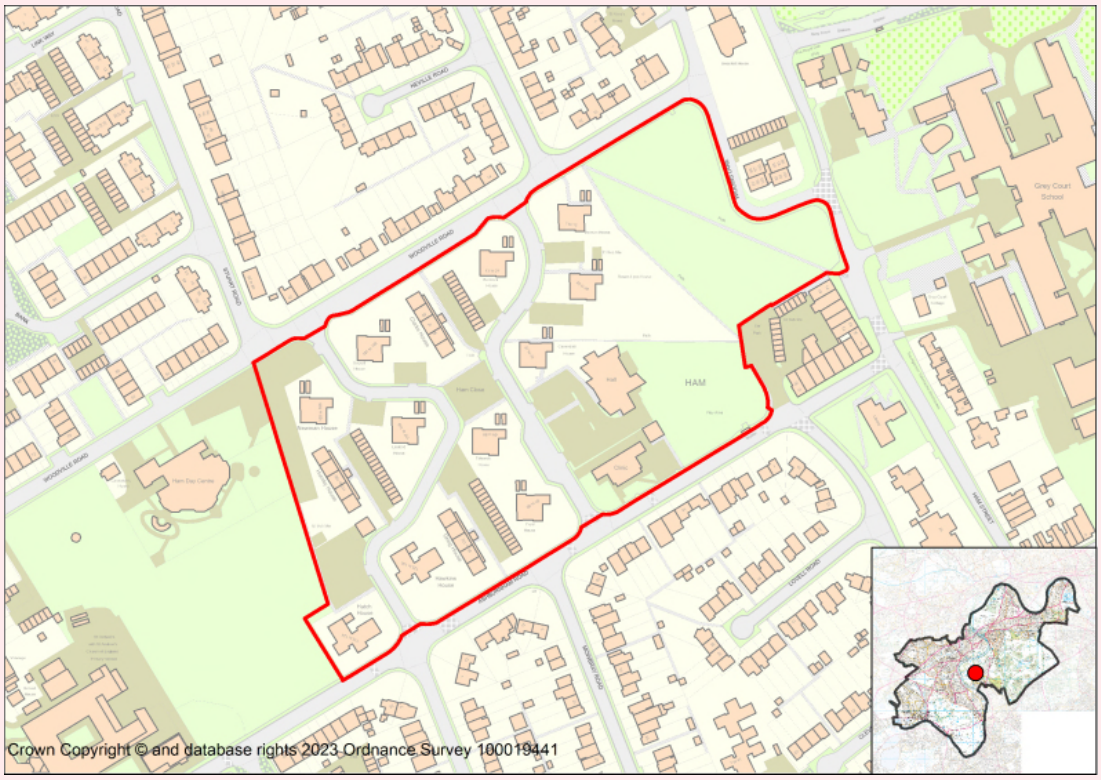
The Council will continue to explore funding opportunities to take forward bridge feasibility for a new foot and cycle bridge linking Ham and Twickenham (according with Neighbourhood Plan Community Proposal 1).

See details in the Site Allocations within this area:

- Ham Close, Ham
- Cassel Hospital, Ham Common, Ham

Statement Site Allocation 23

Ham Close, Ham



CONTEXT: Proposed Site – Ham Close, Ham, Richmond, TW10 7PB			
Ward	Ham, Petersham & Richmond Riverside	**Site Area**	4.31 ha
Land ownership	Private (formerly public)	**CIL Band**	Richmond CIL: Ham Petersham – Low MCIL: Band 1
Existing land uses	192 residential flats (Use Class C3) managed by Richmond Housing Partnership (RHP), youth centre (Use Class F2), health clinic (Use Class E), shops (Use Class E)		
Local Plan Place-Based Strategy	Ham Petersham & Richmond Park	**Urban Design Study Area**	E1 Ham & Petersham Residential
Village Plan Guidance	None	**Neighbourhood Plan**	Ham & Petersham Neighbourhood Area
London Plan Designations	Brownfield Land Register	**Type of Centre**	None – outside town centre
Transport / Highways	• PTAL 1a/b 'very poor' • Teddington Station approximate 30 minute walk • No Controlled Parking Zone	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Ham Close, Ham, Richmond, TW10 7PB			
Flood Risk	• Flood Zone 1 • Area Susceptible to Surface Water Flooding (between 1 in 100 and 1 in 1000 chance) • Area Susceptible to Groundwater Flooding (>75% risk)	**Trees**	• Some well-established high townscape value trees on site. None protected. • Proposed
Views	None		
Heritage Assets	Archaeological Priority *Area:* Zone – Ham Fields Adjacent to the site: • Conservation Area - CA23 Ham House (immediately east) • Listed Buildings – Beaufort House, Ham Street (35m east) (Grade I), Beaufort Cottages, Ham Street (35m east) (Grade II), Newman House, Ham Close (70m east) (Grade I) • Buildings of Townscape Merit (BTMs) - 199 Ham Street (50m east), 1-6 Tollemache Almshouses, Ham Street (18m southeast)	**Access to Open Space / Nature**	• Back Lane Open Space (known as Ham Village Green) (eastern part of site east) - Other Open Land of Townscape Importance (OOLTI), Public Open Space • St Richard & St Andrew C of E Primary School (immediately adjacent west) - OOLTI
Relevant Planning History	• 22/1442/FUL - Demolition of existing buildings on-site and change of use of land within Ham Close, the Woodville Day Centre and St Richards Church of England Primary School and the existing recycling and parking area to the east of Ham Village Green for a phased mixed-use redevelopment comprising: a. 452 residential homes (Class C3) up to 6 storeys (with plant above) b. Community/Leisure Facility (Class F2) of up to 3 storeys in height (with plant above) c. Maker labs (sui generis) of up to 2 storeys d. Basement car park e. Provision of on-site cycle, vehicle and servicing parking f. Provision of amenity space and playspace g. Site wide landscaping and alterations to Ham Village Green, and h. New pedestrian, vehicle and cycle accesses and internal routes and associated highways works. - ~~Committee resolution to approve subject to referral to the GLA at Stage 2 and no adverse direction being received, and conditions/informatives.~~ *Permission granted 22/03/2023.*		
Description of Current Site Character	The Ham Close Estate is a 1960s infill development between Ashburnham Road and Woodville Road, connected via Ham Close, consisting of orthogonal residential tower blocks ranging from 3 to 5 storeys. These are managed by RHP, who is the freeholder. They are poorly constructed by modern standards, with poor insulation and damp; they fail to meet minimum space standards; and none of the units benefit from lifts or private amenity space. The estate also includes the Ham Youth Centre and large car park; Ham Clinic; a block of shops and flats on the corner of Ham Street/Ashburnham Street; and public open space Ham Village Green. The buildings are spaced well apart on the site with a significant amount of grassed areas, lending the estate good permeability. There is also on-site parking, including garages, areas of hard standing and two vehicular routes through the estate (Ham Close). The Hill Group has been working in partnership with RHP for regeneration of the estate and submitted a planning application in June 2022 for demolition of the existing flats and creation of 452 new homes (affordable and private); two new community buildings which will replace the youth centre; and reprovision of open space. In September 2022 the Council approved use of Compulsory Purchase Powers to secure the regeneration. The Council is working in cooperation with RHP including through funding support. Further information can be found on the dedicated Ham Close website.		

CONTEXT: Proposed Site – Ham Close, Ham, Richmond, TW10 7PB	
Neighbour Context	The surrounding area is suburban and low rise in nature. To the north fronting Woodville Road are two-storey interwar short terraces and semi-detached houses. To the east is the boundary of Ham House Conservation Area, where there a number of protected trees and listed buildings. To the east there are flat-roofed three-storey post-war flats fronting Wiggins Lane and the Grey Court School campus and grounds beyond Ham Street. South of the site at the corner of Ham Street and Ashburnham Road is Ham Library. Along Ashburnham Road are two-storey terraces and three-storey flat-roofed blocks of flats further east. East of the site is St Richard's CE Primary School, Ham Children's centre, St Richard's C of E Church and the Richmond Council-run Woodville Residential Care Home.

Vision: Proposed site - Ham Close, Ham

Proposed redevelopment should re-provide the existing affordable housing and any additional housing over and above this level should provide affordable housing in line with Local Plan Policy 11 'Affordable Housing'. Use of the land should be optimised to provide high quality living spaces for both existing and new residents of Ham Close.

- **As the land was originally owned by the Council, the policy expectation on public land disposals is that higher levels of affordable housing should be achieved.**
- **There is a need to retain, and where possible enhance, the landscape and existing green spaces, including Ham Village Green and trees wherever possible.**
- **Servicing, car and cycle parking should be provided as part of the regeneration of the area, in line with London Plan standards, and any development should enhance the quality of the local townscape, thereby creating a more cohesive sense of place.**
- **Any redevelopment proposal should respond positively to the unique and distinctive character of Ham Close and Ham, including the setting of the adjacent Ham House Conservation Area and the listed buildings and Victorian properties that line the frontage. Potential impacts of any development on the views and setting of Ham House should be carefully considered in order to avoid adversely affecting the setting of Ham House.**
- **The Urban Design Study identifies Ham Close as a mid-rise building zone (5-6 storeys) with the opportunity for any new development to respond appropriately to the surrounding landscape and scale, in accordance with Local Plan Policy 45 'Tall and Mid-Rise Building Zones'. Any development should respond appropriately to the surrounding landscape and scale and should demonstrate positive benefits in terms of townscape, local aesthetic quality and relate well to the local context. Redevelopment of the site should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profile and design guidance in the Urban Design Study.**
- **There is also a need to take into account the adopted Ham and Petersham Neighbourhood Plan, which sets out further guidance and policies that any development proposal will be assessed against, including Policy O3 'Ham Close'.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 24

Cassel Hospital, Ham Common, Ham

CONTEXT: Proposed Site – Cassel Hospital, 1 Ham Common, Ham, Richmond, TW10 7JF			
Ward	Ham, Petersham & Richmond Riverside	**Site Area**	3.97 ha
Land ownership	Public	**CIL Band**	Richmond CIL: Ham Petersham – Low MCIL: Band 1
Existing land uses	NHS Hospital (Use Class C2)		
Local Plan Place-Based Strategy	Ham Petersham & Richmond Park	**Urban Design Study Area**	E2 Ham Common & Riverside
Village Plan Guidance	None	**Neighbourhood Plan**	
London Plan Designations	Brownfield Land Register	**Type of Centre**	None- outside town centre
Transport / Highways	• PTAL 1b/2 'very poor/poor' • Teddington, Twickenham and Strawberry Hill	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Cassel Hospital, 1 Ham Common, Ham, Richmond, TW10 7JF			
	• Stations approximate 55 minute walk • No Controlled Parking Zone		
Flood Risk	• Flood Zone 1 • Area Susceptible to Surface Water Flooding (1 in 1000 chance) • Area Susceptible to Groundwater Flooding (>=25% <50%risk)	**Trees**	T1 (TPO T0713) southeast corner of site. All trees on site protected via conservation area. T1 (TPO T1122) outside site on northwest boundary.
Views	None		
Heritage Assets	Archaeological Priority Zone – Ham CA7 Ham Common Conservation Area Listed Building – The Cassel Hospital House (Grade II) Adjacent to the site: • Conservation Area - CA67 Parkleys Estate Ham (immediately east) • Listed Buildings – Langham House estate, Langham House Close (immediately west) (Grade II), Fox House, Upper Ham Road (90m northeast) (Grade II), Ivy House Cottages and Railings, Parkleys Estate (50m east) (Grade II), The Cottages and Garden Walls (40m south) (Grade II) • Buildings of Townscape Merit (BTMs) - 1-9 Upper Ham Road and Gate House (immediately east), The Hand & Flower public house and The Stable (55m east), St Andrews Place (65m east)	**Access to Open Space / Nature**	• Cassel Hospital grounds - Other Open Land of Townscape Importance (OOLTI), Site of Important Nature Conservation (SINC) • Ham Common (immediately north) - Metropolitan Open Land (MOL), OOLTI, SINC
Relevant Planning History	None		
Description of Current Site Character	Cassel Hospital provides treatment for adults and young people with severe and complex personality disorders. Owned by ~~West London Mental Health Trust (WLMHT)~~ *West London NHS Trust*, the hospital is a series of buildings up to 3-storeys in height, some of which are listed, set in extensive grounds to the south. Access is via Ham Common to the north, with some limited on-site car parking at the front of the main hospital.		
Neighbour Context	The surrounding area is very sensitive and comprises a high number of Listed Buildings and BTMs within the Ham Common and Parkleys Estate Conservation Areas. The designated Ham Common to the north lends the area an open character. To the west of the site is Langley House Close which contains the Grade II listed three-storey Langley House estate. South of the site is Malden House School and two-storey semi-detached dwellings fronting Dukes Avenue and two-storey cottage terraces fronting Craig Road. Warners Lane runs along the southeastern part of the site which is also two-storeys in character but is more mixed with some light industrial uses alongside the residential. Upper Ham Common bounds the site to the east which marks the boundary of the Grade II listed Parkleys Estate. Here building		

CONTEXT: Proposed Site – Cassel Hospital, 1 Ham Common, Ham, Richmond, TW10 7JF	
	heights range between 1-3 storeys. Ham Common (road) bounds the site to the north which separates the site from Ham Common. At the northeastern corner of the site is the 3-storey Morgan's House which is flats.

Vision: Proposed site - Cassel Hospital, Ham Common, Ham

If the site and hospital are declared surplus to requirements, social and community infrastructure uses are the most appropriate land uses for any development proposal. Conversion or potential redevelopment for residential uses could be considered if it allows for the protection and restoration of the listed buildings.

- **Development is dependent on the hospital being declared surplus to requirements and ~~WLMHT's~~ *West London NHS Trust's* decision on how much of the site they would need to retain for their own future needs. It is therefore recognised that the site could come forward for development as a whole or in part.**
- **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 policy-compliant affordable housing (in line with a public sector land disposal be considered as a potential redevelopment option.**
- **Local Plan Policy 49 'Social and Community Infrastructure' proposes that should a scheme come forward for redevelopment or change of use to 100% genuinely affordable housing, in accordance with Policy 11 ' Affordable Housing' in terms of mix, tenure and affordability, then it would not need to be considered for alternative social infrastructure use nor marketing evidence submitted. In those circumstances, a wholly affordable housing scheme would be supported.**
- **It is acknowledged that conversion or potential redevelopment for 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.**
- **On-site car and cycle parking in line with London Plan requirements would need to be provided as part of any residential scheme.**
- **Development would not be supported in the parts of site that are designated OOLTI and SINC. Any future proposal would need to protect and where possible enhance the character and openness of the designated open land.**
- **Any restoration and/or conversion would have to respect the significance of the heritage asset; protect and enhance the listed buildings, ensuring their sensitive repair and re-use, and the Ham Conservation Area and setting. The settings of neighbouring listed buildings would also need to be considered as part of any development on this site.**
- **There is also a need to take into account the adopted Ham and Petersham Neighbourhood Plan, which sets out further guidance and policies that any development proposal will be assessed against, including Policy O5 'Cassel Hospital'. Redevelopment of the site should also have regard to the design objectives and general guidance relating to the local character of the area in the relevant character area profile and design guidance set out in the Urban Design Study.**

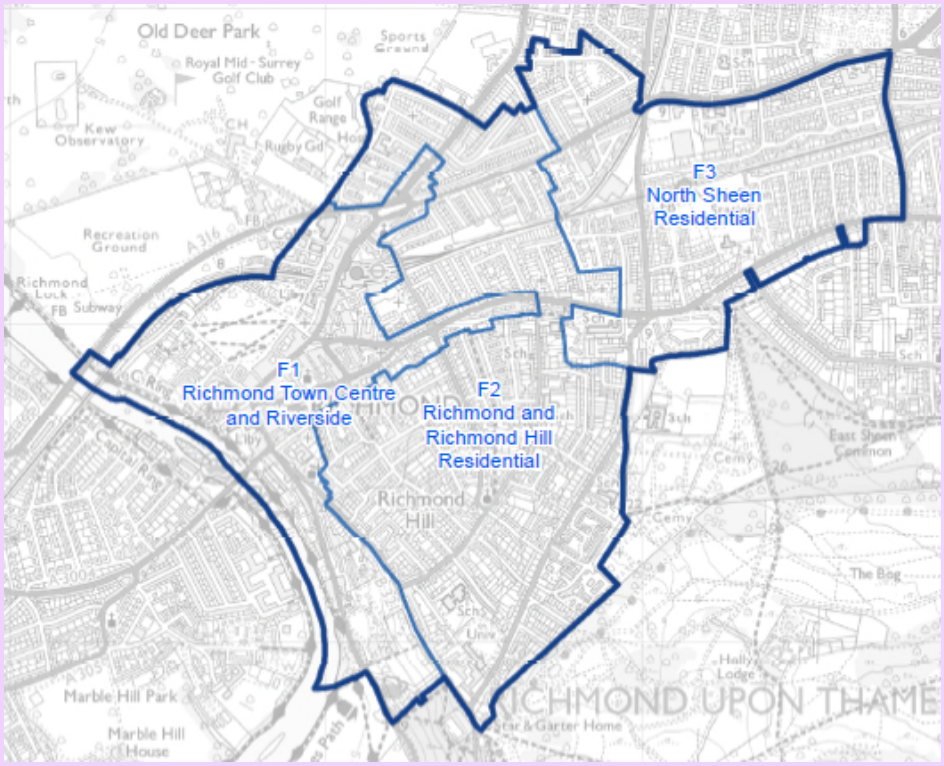
Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

11 Place-based Strategy for Richmond & Richmond Hill

Policy PBS6 Place-based Strategy for Richmond & Richmond Hill

Area Profile

The Richmond & Richmond Hill area encompasses Richmond town centre and riverside, and the residential and mixed use areas into Richmond Hill and North Sheen. These are character areas F1, F2 and F3 in the Urban Design Study.



Richmond's character derives from its location on the River Thames and its historic built environment and landscape, providing a strong setting to the town centre and surrounds. There are four Conservation Areas which are at the core of the town centre character. The wider place includes the historic Green, the open spaces along the riverside, accessed from the centre along characterful, intimate pedestrian lanes, and connectivity to the Thames Path, Old Deer Park and Richmond Park. The Place-based Strategy for Ham, Petersham & Richmond Park recognises Richmond Park faces recreational pressures but has protected status as an important habitat for wildlife and a Site of Special Scientific Interest. The residential areas encompass Richmond Hill in the south-east and the gradual transition towards Kew to the north-east, reflecting much of its historical character and scenic views as a result of the steep topography. There are neighbourhood centres at Sheen Road and Friars Stile Road, and Important Local Parades at Lower Mortlake Road and Kew Road.

Richmond town centre is the most accessible centre by public transport. As major road infrastructure runs through the area, there is a prominence of roads in the centre. The town centre is defined as a 'major' centre in the London Plan's network of town centres. It is the major shopping centre in the borough comprising a range of good multiple and smaller specialised shops within a high quality

environment. Richmond has attracted an impressive cluster of technology and IT companies. It also has a wide range of leisure and entertainment facilities such as theatres, a Curzon cinema, Pools on the Park, the Museum of Richmond and numerous public houses, cafes and restaurants.

As part of the Urban Design Study consultation in 2021 feedback was invited on what people valued in their area. Character area F1 Richmond Town Centre and Riverside scored highly for green and open spaces. F2 Richmond and Richmond Hill Residential was regarded highly for attractiveness, valuing heritage, green spaces, vibrancy, shops and restaurants and culture. F3 North Sheen Residential scored relatively poorly for most features.

Overall strategy

Overall, the Urban Design Study recognises Richmond Town Centre (F1) and Richmond and Richmond Hill (F2) having a high sensitivity to change, with both areas having strong character. Richmond Town Centre has a strong sense of place and heritage and the strategy is to conserve the richness of townscape and historic elements and enhance the identity of specific areas (notably around the station) and the functioning of the area as a town centre. North Sheen Residential (F3) has a medium sensitivity to change overall, with some parts of the urban grain fragmented and with detracting features. Positive change has the potential to enhance character to create a sense of place, and the strategy is to improve the area. The Urban Design Study contains design guidance for each character area and for Richmond's Riverside.

Richmond is the borough's major centre as recognised in the London Plan, drawing in visitors from the borough and beyond, and is considered a town centre with strong commercial growth potential. The area's night time economy is classified as NT2, with regional or sub-regional significance, hosting an array of cafes, restaurants, bars, pubs and cultural activities, including the Richmond Theatre, Orange Tree Theatre and the Curzon Cinema. With demand for leisure uses increasing, there is opportunity to build on this evening and night time culture across the town centre, improve green spaces and along the Riverside, including improved wayfinding from Richmond Station.

The 2020 Centre Land Use Survey reported an increase in vacancies in Richmond town centre due to the impact of the pandemic, with visible vacancies in shopping frontages, such as the closure of House of Fraser. The Retail Study 2023 (phase 2) reports that Richmond is considered to have an upscale market position and forecasts an increase in convenience goods floorspace *by 2039* and additional food/beverage floorspace requirements, resulting in total *requirement (retail and food/beverage)* of c~~a~~. 3,270sq.m (gross) uses for Richmond. *An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study which supersedes earlier forecasting. It suggests that in Richmond there will be a surplus of retail (comparison and convenience) floorspace for both the 2034 (310 sqm) and 2039 (84 sqm) forecasts and a requirement for 2030 sqm of food/beverage floorspace by 2034 rising to 3300 sqm in 2039, resulting in an overall requirement (retail and food/beverage) of c 1720 sqm (gross) rising to 3240 sqm (gross) in 2039.* There is therefore no need to allocate for additional floorspace, but there is expected to be a shift from comparison goods retail space to food/beverage and leisure/cultural uses, with vacant shop premises also converting to these uses. This may utilise the flexibility introduced by Government allowing for changes of use within Use Class E (commercial, business and service uses) which in principle do not require planning permission.

Other initiatives

The Council supports businesses and retailers working with the current Richmond Business Improvement District (RBID), Be Richmond, which has been in place since 2017 and is continuing efforts to ensure Richmond fulfils its potential as a great place to live, work and explore. Be Richmond aims to highlight the town's strengths and focuses on five priorities:

- Supporting Business Growth
- Enhancing the look and feel of the BID area
- Raising the profile of Richmond to all relevant parties
- Implementing key corporate and social responsibility strategies
- Working to address parking and traffic congestion issues

Be Richmond commissioned the preparation of a Place Plan in 2019 and following the production of a baseline report has produced the Future Vision for Richmond (2021). The vision statement is to:

> *Support Richmond become fit for the future: helping it be a resilient, prosperous, vital and healthy place for people, through improvements which help them who live, work, and explore.*
>
> *Strengthen its role as a diverse and exciting cultural destination, drawing energy and focus from its strong heritage and landscape identity.*

There are six themes:

Strength of character: Celebrate Richmond's unique historic character, its longstanding role as a leisure destination, a hub for culture, and as part of the Arcadian Thames.
Open for business: Support flexibility, diversity and growth of businesses, recognising the changing nature of the town centre offer, and also the important role of places outside of the core retail area.
Places to pause: Enhance and supplement Richmond's network of public spaces, supporting diverse public life, and providing a new focal point.
Community wellbeing: Support a healthy and happy community, with spaces for people of all ages, abilities, and all walks of life.
Walk this way: Strengthen pedestrian connections between different parts of the town, making the rich urban structure more legible, giving people the confidence to choose a less well-trodden path and explore the wider area.
Green and pleasant land: Make the most of Richmond's open spaces and riverine landscape, and provide additional green, for amenity, biodiversity, and in response to the climate emergency.

A pilot Clean Air Zone within Richmond Town Centre is being progressed. As the most polluted location in our borough and a hot spot for through traffic, the ambition is to reduce polluting vehicles and dissuade vehicles from unnecessarily using the town centre as a through route. This will help to establish the priorities of the local and wider Richmond Town Centre community with consideration given to air quality, public realm improvements, a balance of both or other measures.

Vision

The vision for Richmond & Richmond Hill is to retain and enhance its unique character and create a community and cultural offer in and around the Old Town Hall and Riverside to enhance its unique visitor attraction.

The aim is that Richmond Town Centre will continue to be a thriving major centre with a diverse mix of retail, employment, service, leisure and arts uses.

Though encouraged, the growth of the evening economy will be carefully managed to ensure the amenity of residents is maintained.

Policy

Future development in this place is expected, where relevant, to:

- **Contribute to a sense of activity and vibrancy in the town and neighbourhood centres, to improve and restore high street frontages and the lanes to encourage a diverse range of uses, including independent shops and businesses, emphasising local makers and artisans.**
- **Encourage the provision of office floorspace and new flexible workspaces within the town centre and intensification of existing employment sites to provide for jobs and support local businesses.**
- **Facilitate the temporary reuse of vacant units to help diversify the town centre offer and activate underutilised frontage.**
- **Enhance the public realm through creating high quality spaces in the town centre; reinforcing a retail circuit by upgrading Eton Street and Red Lion Street; creating a new destination hub at Whittaker Avenue Square; enhancing the triangle of land between Hill Rise, Petersham Road and Compass Hill as publicly accessible green space; enhancing Richmond Hill gateway; improving wayfinding and the sense of arrival at Richmond Station; and enhancements at Richmond Riverside and Richmond Promenade.**
- **Promote routes for active travel and exercise, encouraging healthy activity and exploration of the Richmond area by local workers, visitors and residents via sustainable travel. Contribute to a reduction in car travel in the Richmond area and improve air quality. Support greening through tree-planting on the High Street (including the station) and Whittaker Avenue Square; introducing 'green trails' across the town centre through to the river and Old Deer Park; creating green walls on the lanes where appropriate; and enhancing the riverside environment.**
- **Contribute to measures related to air quality, public realm and transport, to implement priorities informed by work around the pilot Clean Air Zone within Richmond Town Centre.**
- **Ensure that any expansion and management of entertainment and leisure facilities is sensitive to the amenity of people who live in the centre and the wider functioning of the area; promoting the night-time economy through diversifying the range of cultural venues and offers; encouraging on-street al fresco dining and making a welcoming environment for all night-time economy users and workers.**
- **Support the cultural and community offer for both residents and visitors around the Richmond Cultural Quarter, including bringing the reference and lending libraries together and enhancing The Museum of Richmond to create a cultural hub to provide a destination for visitors, and encouraging outdoor temporary and permanent art and theatre interventions.**
- **Maintain and provide new public toilets within the public realm, supplementing the Richmond Community Toilet Scheme, and including provision at Richmond Station and to serve Richmond Riverside and Richmond Green.**
- **Improve North Sheen Residential area by improving the sense of arrival at North Sheen station, along with upgrades to the public realm and greening opportunities.**

Within the town centre boundary, Richmond Station (Site Allocation 25) provides a major redevelopment opportunity, which could provide substantial interchange improvements as well as a range of appropriate town centre uses, with some opportunity to accommodate a landmark tall building within the heritage and other constraints identified, in accordance with Policy 45 Tall and Mid-Rise Building Zones. There is an opportunity to replace, upgrade, or better integrate, the multi-storey car park on Paradise Road, so that it better addresses the streetscape and is less prominent in views. The former House of Fraser site (Site Allocation 26) on George Street is expected to be repurposed to deliver a mix of uses, including retail, offices/workspace, and leisure/community use, with improved active ground floor street frontages including along Paved Court and at Golden Court.

See details in the Site Allocations within this area:

- Richmond Station, Richmond
- Former House of Fraser, Richmond
- Richmond Telephone Exchange, Spring Terrace, Richmond
- American University, Queens Road, Richmond
- Homebase, Manor Road, North Sheen
- Sainsburys, Lower Richmond Road, Richmond

Statement Site Allocation 25

Richmond Station, Richmond

CONTEXT: Proposed Site – Richmond Station, The Quadrant, Richmond, TW9 2NA			
Ward	South Richmond	**Site Area**	1.96 ha
Land ownership	Private	**CIL Band**	Richmond CIL: South Richmond – Higher MCIL: Band 1
Existing land uses	Railway Station (Sui Generis) and associated uses		
Local Plan Place-Based Strategy	Richmond & Richmond Hill	**Urban Design Study Area**	F1 Richmond Town Centre
Village Plan Guidance	Character Area 15 & Conservation Area 17 'Central Richmond', Richmond & Richmond Hill Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	Major town centre Brownfield Land Register	**Type of Centre**	Richmond ~~Main~~ *Town* Centre Boundary
Transport / Highways	• PTAL 6B 'excellent' • Richmond Station provides Southwestern train services and also access to Underground and Overground services.	**Air Quality**	Air Quality Management Area Pilot Clean Air Zone

CONTEXT: Proposed Site – Richmond Station, The Quadrant, Richmond, TW9 2NA			
	• Controlled Parking Zone A1 – Richmond Town • Local distributor road / Crown road		
Flood Risk	• Flood Zone 1 • Critical Drainage Area • Area Susceptible to Surface Water Flooding (between 1 in 30 and 1 in 1000 chance) • Area Susceptible to Groundwater Flooding (<75% risk) Throughflow Catchment Area	**Trees**	None
Views	None		
Heritage Assets	Archaeological Priority Zone – Richmond Town CA17 Central Richmond Conservation Area Building of Townscape Merit (BTM) - Richmond Railway Station Adjacent to the site: • Listed Buildings – Milestone at junction with Church Road/Kew Road (70m north) (Grade II), Church of St John the Divine, Kew Road (50m north) (Grade II), 6-8 Church Road (30m northeast) (Grade II) • BTMs – properties fronting Church Road Church Road (immediately northeast and southeast), properties fronting Sydney Road (nearest 35m to east), properties fronting Kew Road (opposite Kew Road to west), properties fronting The Quadrant (immediately south)	**Access to Open Space / Nature**	• Michels Row Open Space - (150m north) Other Open Land of Townscape Importance (OOLTI), Public Open Space • Old Deer Park Sports (170m northwest and west) - Metropolitan Open Land (MOL) • Little Green Richmond (100m southwest) and Richmond Green (190m southwest) - MOL, Public Open Space
Relevant Planning History	~~None.~~ *Planning permission granted 11/06/2024 under application reference 23/3371/FUL for creation of two additional levels of Class 3 accommodation comprising 7no. units at Westminster House.*		
Description of Current Site Character	The Site Allocation comprises Richmond Station, the railway tracks to the rear, Gateway House and the multi-storey car park to the south, and Westminster House and open car park to the north. Richmond Station lies in the heart of the town centre and is a busy interchange which acts as the gateway into Richmond. Its 1930 Art Deco façade and entrance/booking hall make it worthy of its BTM status, though the side and rear of the building is unattractive and is not considered to contribute to the setting. Late 19th century canopies cover the tracks close to the station. The station building is 2-3 storeys with retail units occupying the ground floor and office space in upper floors. The Urban Design Study identifies the underwhelming sense of arrival at the station and a negative feature. Westminster House is a 5-storey office block with basement gym which is included in the Primary Shopping Area fronting Kew Road. Gateway House adjoins the station to the south, which is a 4 storey office block rising to 6 storeys to the rear where land levels are lower. The site is a Key Office Area and there is an Article 4 Direction which removed permitted development rights for change of use from Class E to residential.		

CONTEXT: Proposed Site – Richmond Station, The Quadrant, Richmond, TW9 2NA	
	The whole of the site is within the Central Richmond Conservation Area.
Neighbour Context	The surrounding area is very sensitive and comprises a high number of Listed Buildings and BTMs within the conservation area. Kew Road which bounds the site to the west forms part of a busy shopping centre comprising a mix of uses, including offices. Building styles vary and range from 2 to 4 storeys. To the south the area is more residential comprising purpose-built flats. Immediately south of the site adjoining the car park is Northumbria Court, 4 storeys in height. Beyond this, dwellings on Litchfield Gardens range from 2 to 3 and a half storey dwellings and purpose-built flats 3 to 6 storeys. Adjoining the site to the north is Thames Link House, a large 5-storey office block. Bounding the site to the east is Church Road which crosses the train track overhead via a bridge. To the east of the site the character is residential comprising dwellings 2 to3 and a half storeys, the majority of which are BTMs.

Vision: Proposed site - Richmond Station, Richmond

There is opportunity for comprehensive redevelopment to provide an improved transport interchange, public realm and an appropriate mix of town centre uses. Appropriate uses include a mix of commercial and community uses, to include retail, offices/workspace and leisure/community use, together with residential on upper floors.

- **There is a need for a comprehensive approach, including transport interchange improvements for National Rail and London Underground, to be considered in partnership with Network Rail and TfL.**
- **The Richmond upon Thames Retail and Leisure Study (Phase 2) forecasts a surplus of retail *(comparison and convenience)* floorspace (118 sqm) and a requirement for 1,956 sqm of food/beverage floorspace by 2034, amounting to a small total requirement *(retail and food/beverage)* of c. 1,750 sqm (gross) uses for Richmond to 2034. *An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study which supersedes earlier forecasting. It suggests that in Richmond there will be a surplus of retail (comparison and convenience) floorspace for both the 2034 (310 sqm) and 2039 (84 sqm) forecasts and a requirement for 2030 sqm of food/beverage floorspace by 2034 rising to 3300 sqm in 2039, resulting in an overall requirement (retail and food/beverage) of c 1720 sqm (gross) rising to 3240 sqm (gross) in 2039.***
- **Any commercial floorspace should enable the centre to grow and diversify in a way that brings vitality and viability and responds to changes in the retail and leisure/entertainment industries, providing commercial, business and service uses to serve the local community, create jobs and provide a destination for visitors, bringing additional benefits to Richmond town centre.**
- **The site is located in the borough's largest centre and therefore there is an expectation that any proposal makes provision for employment floorspace, particularly offices, which could be in the form of flexible shared workspaces (including a proportion of affordable workspace).**
- **Other uses for community, leisure and entertainment, such as for health and fitness or restaurants and cafes, would be appropriate in this highly accessible town centre location. There could be opportunity for publicly-accessible viewing at upper levels as part of a commercial use. Development could contribute to the night-time economy through providing vibrant, active uses that are inclusive and increase surveillance. Development should be designed so that potential amenity impacts are mitigated.**
- **The provision of housing (including policy-compliant affordable housing) in upper floors as part of a mixed-use scheme would be appropriate. Due to its location near a Tube,**

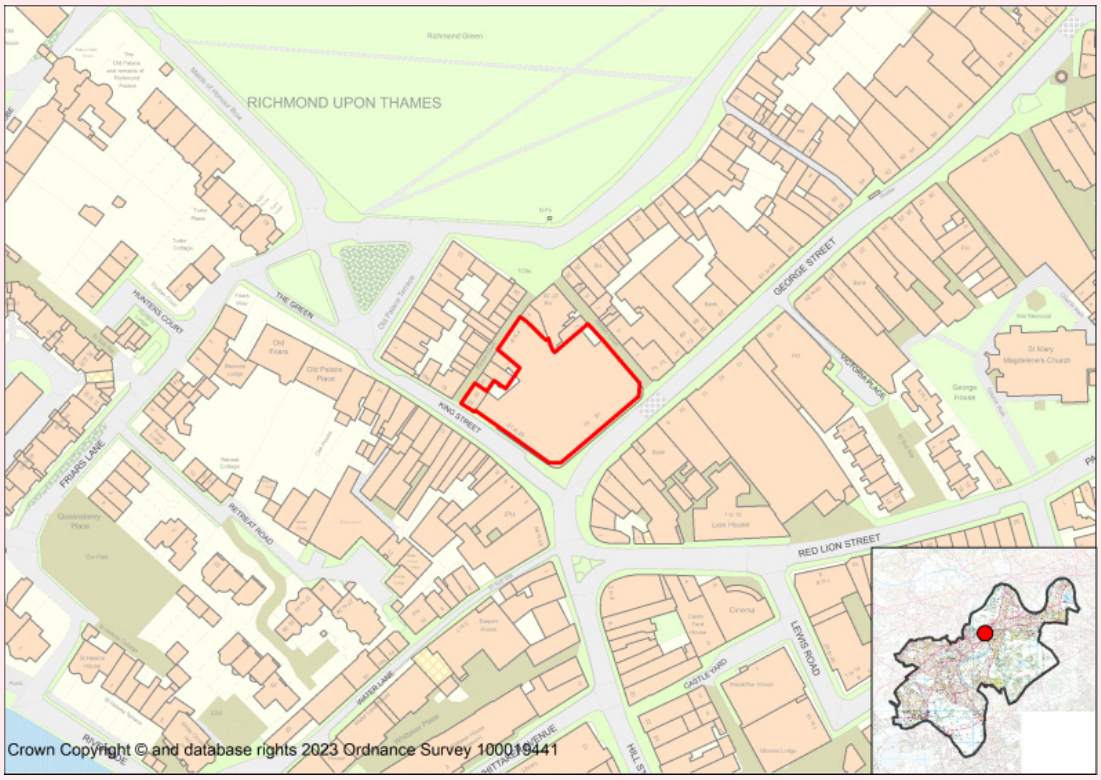
Overground and National Rail Station, the site would lend itself to a Build to Rent scheme (with policy-compliant levels of affordable rented units).

- **There is potential to improve facilities for pedestrians and cyclists (including secure cycle storage), as well as for public transport users, to promote active travel through the opportunity to interchange. This should include future-proofing to consider, for example, e-micromobility, charging and storage, to benefit residents, visitors and businesses (e.g. e-cargo bikes).**
- **Development should ~~demonstrate an understanding of~~ *have due regard to* the station BTM, including its visual character which lies principally in the façade and booking hall. Any redevelopment proposal should be of the highest quality in character and respond positively to the Conservation Area and BTM.**
- **Any redevelopment proposal is expected to contribute to enhancements to the public realm, improving wayfinding and supporting greening, as set out in the Place-Based Strategy for Richmond & Richmond Hill. This should include a high-quality, pedestrian-only amenity space outside the station, to provide a sense of destination that could be used for civic use. There is potential to improve the general environment of the station and crease a sense of arrival.**
- **The Urban Design Study identifies a small area next to the station as a tall building zone (7-8 storeys), with a mid-rise zone buffer (5-6 storeys), with the opportunity for a landmark building that is well designed and sensitive to identified constraints, in accordance with Policy 45 Tall and Mid-Rise Building Zones. It recognises that development is heavily constrained by the scale of the surrounding buildings, the modest scale of The Quadrant, the proximity of the residential area to the south and a number of high value heritage assets.**
- **Redevelopment of the site should have regard to the design objectives and general guidance relating to the local character of the area, set out in the relevant character area profile and design guidance in the Urban Design Study and Village Planning Guidance.**
- **The Council has produced and adopted a development brief for this site and intends to update this SPD.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 26

Former House of Fraser, Richmond



CONTEXT: Proposed Site – Former House of Fraser, 16 Paved Court, 20 King Street, 4-8 & 10 Paved Court and 75-81 George Street, Richmond, TW9 1ND			
Ward	South Richmond	**Site Area**	0.9 ha
Land ownership	Private	**CIL Band**	Richmond CIL: South Richmond – Higher MCIL: Band 1
Existing land uses	Retail (Use Class E(a))		
Local Plan Place-Based Strategy	Richmond & Richmond Hill	**Urban Design Study Area**	F1 Richmond Town Centre
Village Plan Guidance	Character Area 14 & Conservation Area 3 'Richmond Green', Character Area 15 & Conservation Area 17 'Central Richmond', Richmond & Richmond Hill Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	Major town centre None known	**Type of Centre**	Town Centre Boundary - Richmond

CONTEXT: **Proposed Site – Former House of Fraser, 16 Paved Court, 20 King Street, 4-8 & 10 Paved Court and 75-81 George Street, Richmond, TW9 1ND**			
Transport / Highways	• PTAL 6a 'excellent' • Richmond Station approximate 6 minute walk • Controlled Parking Zone A1 – Richmond Town • Local distributor road / Crown road	**Air Quality**	Air Quality Management Area Pilot Clean Air Zone
Flood Risk	• Flood Zone 1 • Area Susceptible to Groundwater Flooding (>=50 <75% risk) • Throughflow Catchment Area	**Trees**	None
Views	None		
Heritage Assets	Archaeological Priority *Area:* Zone – Richmond Town Conservation Areas – CA3 Richmond Green and CA17 Central Richmond Listed Buildings – 20 King Street (Grade II), 6-8 Paved Court (Grade II) Building of Townscape Merit (BTM) - 4 Paved Court Adjacent to the site: • Listed Buildings – 10-14 Paved Court (adjoining site east) (Grade II), buildings fronting Paved Court (opposite Paved Court immediately east) (Grade II), 25 The Green (8m northeast) (Grade II), 3, 6, 7 & 8 King Street (13m south) (Grade II) • BTMs – 27-28 The Green (north corner [outside site]), properties fronting Golden Court (immediately north), properties fronting The Green (immediately north), properties fronting George Street (immediately north and east), properties fronting King Street (immediately south)	**Access to Open Space / Nature**	• Old Palace Terrace Green - (50m east) Other Open Land of Townscape Importance (OOLTI) • Richmond Green (30m north) - Metropolitan Open Land (MOL), Public Open Space
Relevant Planning History	Planning permission granted 23/12/2022 under application ref. 22/2333/FUL for additional storey at 4th floor and basement extension to provide flexible office space and gym.		
Description of Current Site Character	Sitting at the junction of King Street and George Street, the site comprises a large purpose-built department store 4-5 storeys in height, which was formerly a House of Fraser. The entire site is in the Primary Shopping Area and its location in Richmond's town centre meant that the former store was regarded as an anchor in the key shopping area. House of Fraser closed in September 2020 and the site is now vacant. The closed shopfront is part of a wider, lack of active frontages in places along the High Street, which has been identified in the Urban Design Study as a negative feature of the area. The Site Allocation also includes 20 King Street which is a 3-storey later addition to the store at the corner of Paved Court, with a restaurant at ground floor; and 4-8 Paved Court a two-storey row of commercial/retail which adjoins the store to the east. The remainder of the properties on		

CONTEXT: Proposed Site – Former House of Fraser, 16 Paved Court, 20 King Street, 4-8 & 10 Paved Court and 75-81 George Street, Richmond, TW9 1ND	
	Paved Court do not form part of the Site Allocation and neither does the Princes Head public house at the northern corner of the site. There is an Article 4 Direction restricting change of use from Class E to residential. The site is located in a very sensitive location. Whilst the main building has no heritage designations, units within Paved Court are either Grade II Listed or BTM and the site straddles two conservation areas, within which there are numerous Listed Buildings and BTMs nearby. There is no vehicular access to the site or parking.
Neighbour Context	The surrounding area is very sensitive and comprises a high number of Listed Buildings and BTMs within the two conservation areas. Located in Richmond town centre, the character of the area is mixed comprising a range of office, retail, commercial, food and drink and other uses. The majority of the buildings are historical and high quality, though there is some more modern development, such as Water Lane Building opposite the site to the south on Hill Street. Building heights range from 2-3 storeys with accommodation in the roof.

Vision: Proposed site - Former House of Fraser, Richmond

The site is expected to be repurposed to deliver a mix of uses, including retail, offices and leisure/community use, with improved active ground-floor street frontages along Paved Court and at Golden Court to improve the quality and appearance of the town centre.

- **The Richmond upon Thames Retail and Leisure Study (Phase 2) forecasts a surplus of retail *(comparison and convenience)* floorspace (118 sqm) and a requirement for 1,956 sqm of food/beverage floorspace by 2034, amounting to a small total requirement of c. 1,750 sqm (gross) uses for Richmond to 2034. *An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study which supersedes earlier forecasting. It suggests that in Richmond there will be a surplus of retail (comparison and convenience) floorspace of 310 sqm and a requirement for 2030 sqm of food/beverage floorspace by 2034, resulting in an overall requirement (retail and food/beverage) of c 1720 sqm (gross).***
- **In Richmond there is a shortage of units with larger floor plates, although flexible floorspaces that could be adapted to meet the needs for local businesses and small firms will also be supported.**
- **Any commercial floorspace should enable the centre to grow and diversify in a way that brings vitality and viability and responds to changes in the retail and leisure/entertainment industries, providing commercial, business and service uses to serve the local community, create jobs and provide a destination for visitors, bringing additional benefits to Richmond town centre.**
- **The 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 offices, which could be in the form of flexible shared workspaces (included a proportion of affordable workspace).**
- **Any development proposal should be of the highest quality in character, respond positively to the Conservation Areas, protect and where possible enhance the on-site Listed Buildings and BTMs, as well as nearby heritage assets. Development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance in the Urban Design Study and Village Planning Guidance.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 27

Richmond Telephone Exchange, Spring Terrace, Richmond

CONTEXT: Proposed Site – Richmond Telephone Exchange, Spring Terrace, Paradise Road, Richmond, TW9 1LW			
Ward	South Richmond	**Site Area**	0.19 ha
Land ownership	Private	**CIL Band**	Richmond CIL: South Richmond – Higher MCIL: Band 1
Existing land uses	Telephone exchange (sui generis) and associated office use		
Local Plan Place-Based Strategy	Richmond & Richmond Hill	**Urban Design Study Area**	F1 Richmond Town Centre
Village Plan Guidance	Character Area 16 & Conservation Area 31 'Sheen Road', Character Area 11 & Conservation Area 30 'St Matthias', Richmond & Richmond Hill Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	None known	**Type of Centre**	Town Centre Boundary – edge of Richmond town centre

CONTEXT: Proposed Site – Richmond Telephone Exchange, Spring Terrace, Paradise Road, Richmond, TW9 1LW			
Transport / Highways	PTAL 6a 'excellent' Richmond Station approximate 7 minute walk No Controlled Parking Zone Local distributor road / Crown road	**Air Quality**	Air Quality Management Area
Flood Risk	• Flood Zone 1 • Critical Drainage Area • Area Susceptible to Groundwater Flooding (<25% risk) • Throughflow Catchment Area	**Trees**	Significant trees on site protected via location in Conservation Area. Numerous boundary trees outside site protected via TPO.
Views	None		
Heritage Assets	Archaeological Priority *Area:* Zone – Richmond Town Conservation Areas – CA31 Sheen Road Richmond and CA30 St Matthias Richmond Listed Buildings – 20 King Street (Grade II), 6-8 Paved Court (Grade II) Building of Townscape Merit (BTM) - 4 Paved Court Adjacent to the site: • Listed Buildings – Properties fronting Spring Terrace (immediately north) (Grade II) • BTMs – Properties fronting Sheen Road (immediately north and to northeast), properties fronting Church Road (immediately east), properties fronting Dynevor Road (immediately south), properties fronting Mount Ararat Road (55m west)	**Access to Open Space / Nature**	None
Relevant Planning History	None.		
Description of Current Site Character	Richmond Telephone Exchange is a flat-roofed part 3 part 4 storey detached building set back from Sheen Road. It is a purpose-built building dating from the mid-1930s, whose roof is a long-standing communications base system. Access is via Sheen Road to the north and there is a small servicing yard to the west of the building. The site is predominantly hardstanding though there are some significantly sized trees. The site is located in a very sensitive location. Whilst the main building has no heritage designations, it straddles two conservation areas and most nearby buildings are Listed or BTMs.		
Neighbour Context	The site is located to the south of the junction of Sheen Road, Paradise Road and Lichfield Gardens. The surrounding area is predominantly residential and the majority of buildings are either Listed or BTMs. 3-storey dwellings from Sheen Road and Spring Terrace to the north. To the northeast at 37 Sheen Road is The Courtyard comprising 6 residential units converted from office space in		

CONTEXT: Proposed Site – Richmond Telephone Exchange, Spring Terrace, Paradise Road, Richmond, TW9 1LW	
	2021. Rear gardens of dwellings fronting Church Road, Dynevor Road and Mount Ararat Road bound the site to the east, west and south.

Vision: Proposed site - Richmond Telephone Exchange, Richmond

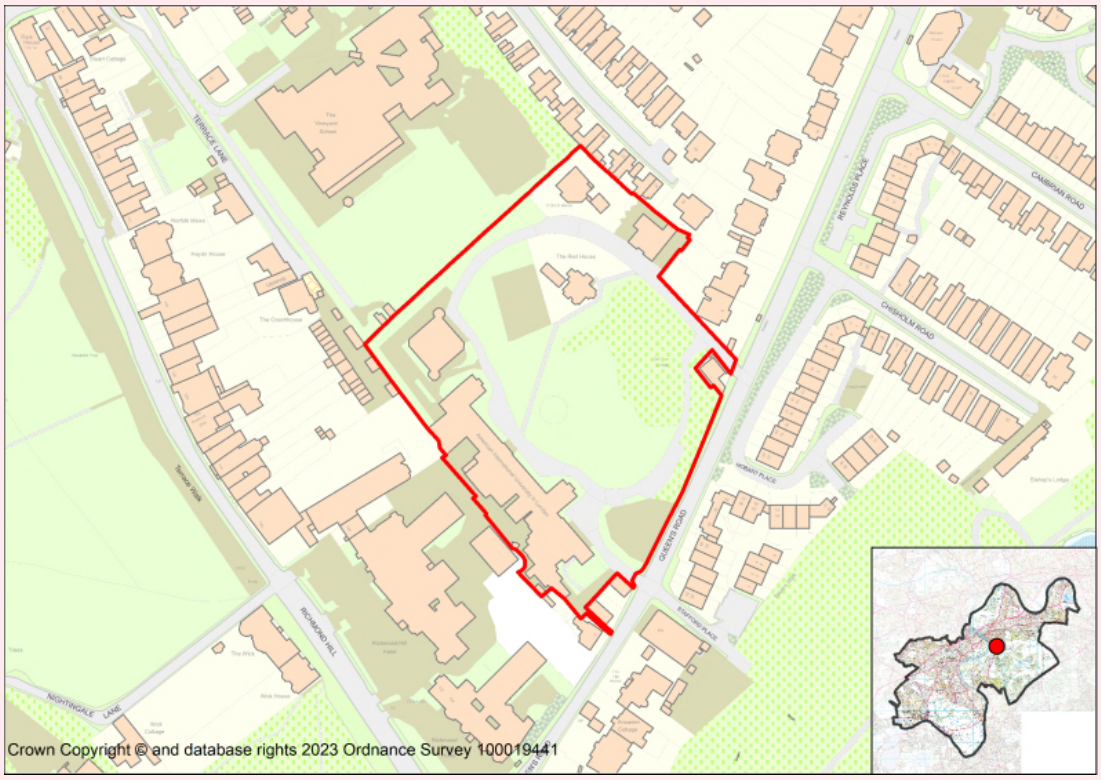
If the Telephone Exchange is declared surplus to requirements by the telecoms landowner, either in whole or part, the Council would support a residential-led scheme, including policy-compliant affordable housing.

- **As the site has an existing employment use, the Council expects that any residential-led scheme that comes forward meets the level of affordable housing set out in Policy 11 Affordable Housing as a minimum, together with evidence that there has been engagement with the GLA and the Council's housing teams to explore grant funding to maximise affordable housing provision.**
- **The Council expects that any proposal demonstrates as a starting-point whether the existing buildings can be converted. If this is not feasible, then a comprehensive redevelopment would be acceptable. If the site is to redeveloped, any height of the new built form should take into account the residential properties which adjoin the site on three sides.**
- **Any development proposal must be of the highest quality in character and protect and where possible enhance the Conservation Areas, as well as nearby heritage assets. Development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance in the Urban Design Study and Village Planning Guidance.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 28

American University, Queens Road, Richmond



CONTEXT: Proposed Site – American International University, Queens Road, Richmond, TW10 6JP			
Ward	South Richmond	**Site Area**	2.01 ha
Land ownership	Private	**CIL Band**	Richmond CIL: South Richmond – Higher MCIL: Band 1
Existing land uses	University and student accommodation – Use Class F1(a) and C2		
Local Plan Place-Based Strategy	Richmond & Richmond Hill	**Urban Design Study Area**	F1 Richmond Town Centre
Village Plan Guidance	Character Area 12 & Conservation Area 5 'Richmond Hill', Richmond & Richmond Hill Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	None known	**Type of Centre**	None – out of centre

CONTEXT: Proposed Site – American International University, Queens Road, Richmond, TW10 6JP			
Transport / Highways	• PTAL 1b 'very poor' • Richmond Station & North Sheen Stations approximate 22 minute walk • No Controlled Parking Zone • Local distributor road / Crown road	**Air Quality**	Air Quality Management Area
Flood Risk	• Flood Zone 1 • Critical Drainage Area • Surface Water Flooding (small area to northeast) (1 in 1000 chance) • Area Susceptible to Groundwater Flooding (<25% risk) • Throughflow Catchment Area	**Trees**	Significant trees on site protected via location in Conservation Area.
Views	None		
Heritage Assets	Conservation Areas – CA5 Richmond Hill Listed Buildings – Main Building (Grade II), 6-8 Paved Court (Grade II) Building of Townscape Merit (BTM) - The Red House Adjacent to the site: • Listed Buildings – Richmond Hill Hotel, Richmond Gate Hotel, Doughty House and properties fronting Richmond Hill (immediately west and south) (Grade II), properties fronting Reynolds Place, Hobart Place, Queens Road, Sayers Walk & Cambrian Road (immediately east) • BTMs – Upper College Lodge (southern corner of site), Porters Lodge (eastern corner of site), 5&7 Queens Road (immediately north), properties fronting Rosemont Road (immediately north), 3 Queens Road, Richmond Gate Hotel (immediately south)	**Access to Open Space / Nature**	• Vineyard School - (immediately northwest) Other Open Land of Townscape Importance (OOLTI) • Richmond Park (60m south and east) - Metropolitan Open Land (MOL), Site of Special Scientific Interest (SSSI) • Petersham Common (100m south and west) - MOL, Site of Importance for Nature Conservation (SINC), Public Open Space
Relevant Planning History	None.		
Description of Current Site Character	The American University Richmond campus has been located on the site since 1972, but now has plans to relocate to a site in a neighbouring borough. Currently the campus provides residential accommodation for its students within three of the buildings on site, via over 200 bedspaces. The site is located in a sensitive area. The main building is Grade II Listed, 3 storeys in neo-Gothic style, with the Red House in the northeast corner a BTM. The site is within a Conservation Area. Access to the site is via Queens Road to the east with some onsite parking. The grounds are predominantly greened and contain a number of trees.		

CONTEXT: Proposed Site – American International University, Queens Road, Richmond, TW10 6JP	
Neighbour Context	The site is located in a very sensitive location; it straddles two conservation areas and very few nearby buildings are not either Listed or BTMs. The site is bounded by Richmond Hill and Richmond Harbour 4* Hotels ranging to 4 storeys in height. To the north of the site is the two-storey Vineyard Primary School set in grounds that are designated open space. This is currently a 3 form entry school with no space for further expansion, according to the School Place Planning Strategy 2019. Rosemont Road bounds the site to the north which comprises houses 2-3 storeys in height. To the east the site is bounded by Queens Road which comprises residential properties in a range of styles ranging up to 3 storeys, beyond which is Richmond Park. Approximately 360m west of the site runs the River Thames, where the area becomes more mixed in nature.

Vision: Proposed site - American University, Queens Road, Richmond

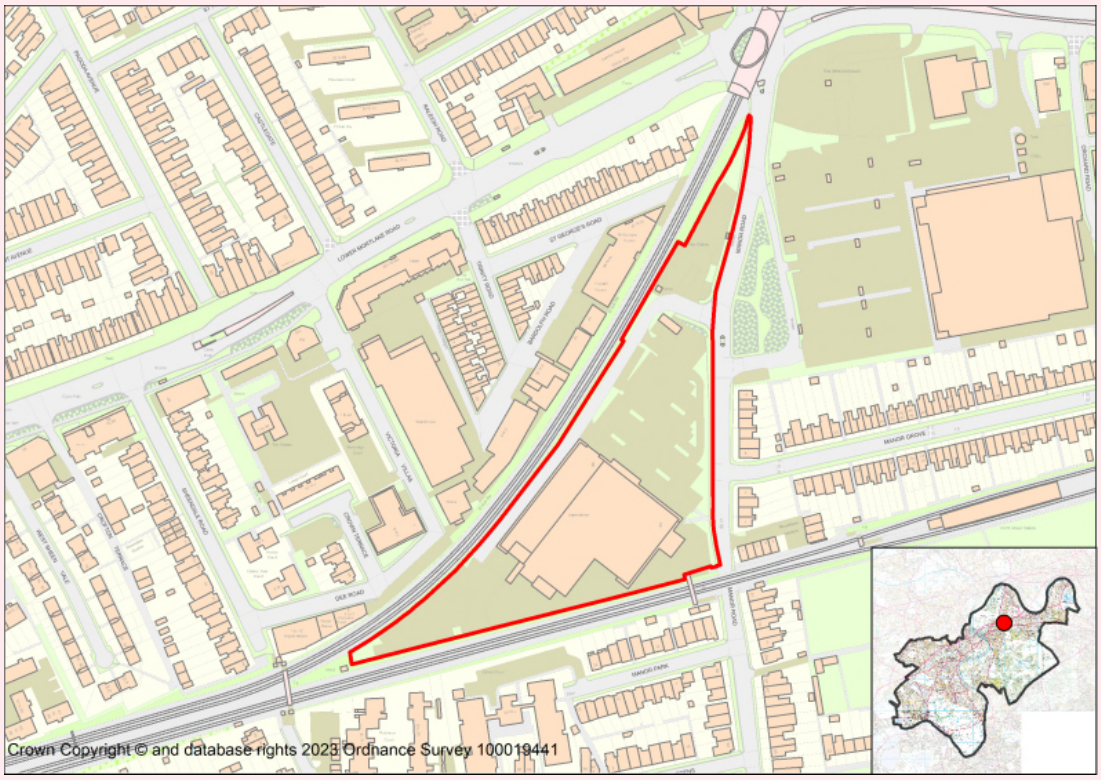
If the site is declared surplus to requirements, then educational uses are the most appropriate land use for the site. If an educational use is not viable on site, then the provision of community/social infrastructure uses would also be appropriate or could be incorporated as part of a mixed-use scheme.

- **If the site is deemed to be surplus to requirement, the Council expects that an educational use is continued on site. A mixed-use proposal incorporating education and social/community infrastructure uses would also be acceptable.**
- **Any development proposal should be of the highest quality in character and protect and where possible enhance the heritage assets on site and the Conservation Area, as well as nearby heritage assets. Development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance in the Urban Design Study and Village Planning Guidance.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 29

Homebase, Manor Road, North Sheen



CONTEXT: Proposed Site – Homebase, 84 Manor Road, Richmond, TW9 1YB			
Ward	North Richmond	**Site Area**	1.84 ha
Land ownership	Private	**CIL Band**	Richmond CIL: North Richmond – Higher MCIL: Band 1
Existing land uses	Retail use hardware store and associated car park (Use Class E)		
Local Plan Place-Based Strategy	Richmond & Richmond Hill	**Urban Design Study Area**	F3 North Sheen Residential
Village Plan Guidance	Character Area 6 'Old Gas Works', Richmond & Richmond Hill Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	Brownfield Land Register	**Type of Centre**	None – out of centre

CONTEXT: Proposed Site – Homebase, 84 Manor Road, Richmond, TW9 1YB			
Transport / Highways	• PTAL 4 'good' • Richmond Station & North Sheen Stations approximate 22minute walk • No Controlled Parking Zone • Local distributer road / Crown road	**Air Quality**	Air Quality Management Area
Flood Risk	• Flood Zone 1 • Critical Drainage Area • Surface Water Flooding (1 in 100 chance) • Area Susceptible to Groundwater Flooding (>=75% risk) • Throughflow Catchment Area	**Trees**	TPO Are Group Wood (T0411) on site to the north and south.
Views	None		
Heritage Assets	None. Adjacent to the site: • Conservation Areas – CA50 Sheendale Road (20m west), CA31 Sheen Road Richmond (50m southwest) • BTMs – properties fronting Manor Grove (opposite Manor Road to east), properties fronting St Georges Road, Trinity Road and Trinity Cottages (opposite railway lines to west and northwest)	**Access to Open Space / Nature**	• Sainsbury's Manor Road - (immediately northeast) Other Open Land of Townscape Importance (OOLTI) • North Sheen STA Allotments (40m east) - OOLTI • Finucane Court, Stanmore Gardens (130m west) - OOLTI
Relevant Planning History	An application (ref. 19/0510/FUL) for redevelopment of the site for a residential-led scheme to provide 385 homes (35% affordable) was refused by Planning Committee in July 2019 on grounds of under-provision of affordable housing, visual impact, residential standards and sustainability. The application was called in by the Mayor of London (ref. GLA/2020/6252/s3) and during the process the scheme was revised to increase the number of homes to 453. The proposal includes buildings up to 11 storeys. ~~The Mayor resolved to grant permission but a decision remains outstanding.~~ *Permission has been granted and the decision notice was issued 23/05/2024.*		
Description of Current Site Character	The site comprises a typical 1990s purpose-built retail store, single-storey with large floorplate and pitched roof with gabled entrance. Formerly a Homebase, the store is now permanently closed and vacant. It comprises a large on-site surface-level car park of approximately 170 spaces to the front and servicing yard to the rear, within which there are two protected tree groups. Access is via Manor Road to the north. There is a TfL bus terminal to the north of the site.		
Neighbour Context	The character of the surrounding area is a mix of residential and commercial. Railway/underground/overground lines bound the site to the south and west/northwest and Manor Road to the east, which further north adjoins the junction roundabout with the A316 Lower Mortlake Road and Lower Richmond Road. Fronting Bardolph Road to the west is a modern 3-storey residential terrace, a 2-storey building materials supplier and Falstaff House, a 4-storey modern block of flats. To the southwest is Dee Road which comprises flats up to 5 storeys in height with some 2-storey dwellings beyond. To the northeast is a large out-of-town retail complex and carpark, which includes a Sainsbury's superstore, which is a Site Allocation in the Local Plan. To the east are 2-storey residential terraces fronting		

CONTEXT: Proposed Site – Homebase, 84 Manor Road, Richmond, TW9 1YB	
	Manor Road, which are BTMs. South of the site beyond the railway tracks the area is more predominantly residential and low rise.

Vision: Proposed site - Homebase, Manor Road, Richmond

There is opportunity for a comprehensive residential-led redevelopment of the site with a flexible range of uses, including retail, office and community/social. This should include the provision of high-quality public realm and improvements to permeability and the Manor Road street frontage, to integrate the development into the surrounding area.

- **The existing bus terminus will need to be retained on site, in consultation with TfL, as well as provision of adequate standing capacity and drivers' facilities.**
- **As the site is located outside of the town centre and Primary Shopping Area, the existing retail use is not protected. The Council does expect that any redevelopment would provide a range of uses on the site, including retail, office and community, to meet local needs.**
- **There is a need for housing in the borough and this site is considered suitable for a substantial provision of new housing units including a policy compliant level of affordable housing).**
- **The Urban Design Study identified part of the site as a tall building zone (7-8 storeys) with a mid-rise buffer zone (5-6 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones. It is recognised that there is currently a planning application with the Mayor which proposes heights up to 11 storeys. However, the Urban Design Study recommends the appropriate heights for the zone are up to 8 storeys to respects the small scale of the surrounding area.**
- **Due to the constraints of the railway lines and built form along Manor Road, including designated BTMs and close proximity to two Conservation Areas, the height of the built form should increase towards the middle of the site and step down to the boundary. Any proposal should assess potential impacts on views and amenity. The Council expects that the street frontage along Manor Road is enhanced.**
- **Proposals should look to provide a high-quality public realm. The Council expects the creation of permeability through the site with sensitive landscape design that can also promote active transport, such as walking and cycling.**
- **There is an expectation that any redevelopment provides new on-site Public Open Space in addition to any external amenity space requirements, delivering multi-functional benefits including for nature conservation and biodiversity value as well as for health and wellbeing of future occupants and users, including surrounding communities.**
- **Any future developer is expected to engage with TfL to ensure development does not lead to unacceptable impacts on the local road network. Any scheme should include pedestrian routes where possible and encourage active travel.**
- **Development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance in the Urban Design Study and Village Planning Guidance.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 30

Sainsburys, Lower Richmond Road, Richmond

CONTEXT: Proposed Site – Sainsbury's Lower Richmond Road, Richmond, TW9 4LT			
Ward	North Richmond	**Site Area**	2.63 ha
Land ownership	Private	**CIL Band**	Richmond CIL: North Richmond – Higher MCIL: Band 1
Existing land uses	Retail and associated car park (Use Class E)		
Local Plan Place-Based Strategy	Richmond & Richmond Hill	**Urban Design Study Area**	F3 North Sheen Residential
Village Plan Guidance	Character Area 6 'Old Gas Works', Richmond & Richmond Hill Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	Brownfield Land Register	**Type of Centre**	None – out of centre

CONTEXT: Proposed Site – Sainsbury's Lower Richmond Road, Richmond, TW9 4LT			
Transport / Highways	• PTAL ~~5~~4 ~~'very~~ good' • North Sheen Station approximate 5minute walk • No Controlled Parking Zone • Local distributer road / Crown road • Adjacent to Transport for London Road Network (TLRN)	**Air Quality**	Air Quality Management Area
Flood Risk	• Flood Zone 1 • Critical Drainage Area • Surface Water Flooding (1 in 1000 chance) • Area Susceptible to Groundwater Flooding (>=75% risk) • Throughflow Catchment Area	**Trees**	Two trees in southwest corner subject to TPO
Views	None		
Heritage Assets	None. Adjacent to the site: • BTMs – properties fronting Manor Grove (immediately south), 1 Shakespeare Terrace, Lower Richmond Road (25m east)	**Access to Open Space / Nature**	• Sainsbury's Manor Road (on site) - Other Open Land of Townscape Importance (OOLTI) • Niton Road/Upper Richmond Road (65m northeast) - OOLTI • North Sheen STA Allotments (95m south) - OOLTI
Relevant Planning History	None.		
Description of Current Site Character	The site comprises a large purpose-built Sainsbury's supermarket, with other complementary uses such as pharmacy, Starbucks coffee shop and car wash, with car park with petrol garage. The supermarket is a well-established and key facility for the local community. There site is accessed from Manor Road. There is also a TfL bus terminus located on the western side of the site.		
Neighbour Context	The surrounding area is a mix of residential, commercial and industrial. The site is bounded by the busy A316 Lower Richmond Road to the north where there is a footbridge to residential terraced streets beyond. To the west the site is bounded by Manor Road, beyond which is the former Homebase site, which is now a Site Allocation in the Local Plan. To the south the site is adjoined by rear gardens of locally listed two-storey terraces fronting Manor Grove. Further east the character becomes more mixed with the Gas Valve Compound, residential flats up to 6 storeys in height and other uses including gym, car wash, Richmond Fire Station and the Market Road Business Park.		

Vision: Proposed site - Sainsburys, Lower Richmond Road, Richmond

The Council will support comprehensive redevelopment of the 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.

- **Any redevelopment proposal will be required to retain and/or reprovide the existing retail floorspace; associated car parking provision is expected to be reprovided in line with London Plan standards.**
- **Redevelopment of the foodstore provides an opportunity to optimise the use of the site and it is acknowledged that any redevelopment proposal may necessitate a period of closure and/or a loss of trade during construction.**

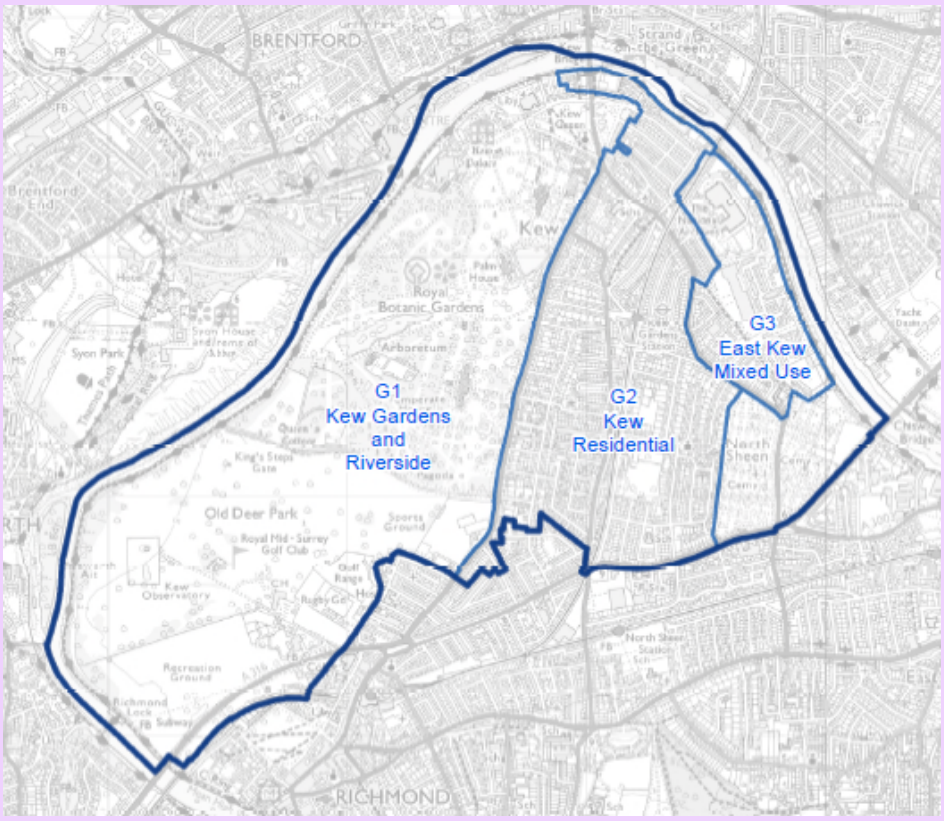
- **There is a need for housing in the borough and this site is considered to be suitable for a substantial provision of new housing units with a policy-compliant level of affordable housing.**
- **There is an expectation that any redevelopment proposal should provide public realm benefits, including improvements to the visual appearance of the area.**
- **There is an expectation that any redevelopment provides new on-site Public Open Space in addition to any external amenity space requirements, delivering multi-functional benefits including for nature conservation and biodiversity value as well as for health and wellbeing of future occupants and users, including surrounding communities.**
- **Any future developer is expected to engage with TfL to ensure development does not lead to unacceptable impacts on the local road network. Any scheme should include pedestrian routes where possible and encourage active travel.**
- **The Urban Design Study identifies part of the site as a tall building zone (7-8 storeys), in accordance with Policy 45 Tall and Mid-Rise Building Zones.**
- **Development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance in the Urban Design Study and Village Planning Guidance.**
- **The site is adjacent to the Gas Valve Compound and any redevelopment proposal needs to take account of its proximity to the gas pipeline.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

12 Place-based Strategy for Kew

Policy PBS7 Place-based Strategy for Kew

Area Profile
The Kew area encompasses Kew Gardens and Riverside, Kew Gardens, and East Kew Mixed Use. These are character areas G1, G2 and G3 in the Urban Design Study.



Kew is enclosed on two sides by a bend in the River Thames. The area's setting is strongly influenced by its scenic meandering river frontage and the significant open spaces of Old Deer Park and the Royal Botanic Gardens, Kew. The open space at Kew Green forms an important gateway to the borough.

The river and related towpaths and open spaces are the defining features of the area. Tree lined streets are a common feature through much of Kew. While Kew Green is fronted by grand Georgian and Victorian homes, to the northeast of the Green are terraced cottages which create a more intimate urban character. Houses are more densely arranged in Kew than many other parts of the borough with shorter set-backs and fewer spaces between properties.

The Royal Botanic Gardens, Kew which was declared a UNESCO World Heritage Site in 2003, is a world-famous and world-leading scientific organisation and botanic garden. It is amongst the most important cultural heritage sites in the world and a key feature of London's identity as a world city. The Government has committed to protecting, conserving, presenting and transmitting to future generations the Outstanding Universal Value of World Heritage Sites and to protecting and conserving their settings.

This area includes Old Deer Park which is a historically important and well used recreational and community area of the borough. The extensive open space supports a range of recreational functions, including the Pools on the Park (Richmond Baths), Richmond Athletic Association and the Royal Mid-Surrey Golf Club.

There is a lively and attractive local shopping centre at Kew Gardens Station, presenting a distinctive gateway for those arriving by rail or underground, and there are also local parades at Kew Green and Sandycombe Road which provide for top-up shopping.

There has been major residential development at East Kew, providing contemporary apartments and houses in a landscaped setting, along with commercial and municipal uses which are in the form of larger scale and less regular development. The Townmead Road Re-use and Recycling Centre provides

for residential and trade waste. There is a well-used out of centre retail park. Visitors also come to the National Archives, which is the official archive and publisher for the UK Government, providing document reading rooms to access the collection as well as events.

As part of the Urban Design Study consultation in 2021 feedback was invited on what people valued in their area. Kew Gardens and Riverside (G1) received very inconsistent scores, but it was scored particularly highly for attractiveness, tranquillity, and green spaces. Kew Residential (G2) scored consistently high for all features, with shops and restaurants, attractiveness and heritage marginally higher. East Kew Mixed Use (G3) features were not scored consistently, showing stark positive views on some aspects mirrored by negative views on other aspects, but in particular attractiveness, tranquillity, and green spaces were considered to be positive features of the area.

Overall strategy

Overall, the Urban Design Study recognises that both Kew Gardens and Riverside (G1) and Kew Residential (G2) have a high sensitivity to change, where the existing character is very strong. It recognises for Kew Gardens and Riverside (G1) that the character area contains a series of unique open spaces and townscape that are in excellent condition, and the strategy for this area is to conserve its character. The Study recognises for Kew Residential (G2) that the characteristic elements and features are largely in good condition, and the strategy for this area is to conserve the character, whilst enhancing existing features where appropriate. For East Kew Mixed Use (G3) it recognises a medium sensitivity to change, as the existing character of the area is disjointed and lacks coherence or identity, with the potential for development to improve the character and address negative qualities, particularly in areas such as around the retail park. It sets out long-term opportunity to transform the character of the area into a coherent and attractive area of mixed-use development and services, looking to improve the sense of place, public access, and townscape legibility. The Urban Design Study contains design guidance for each character area and for Richmond's Riverside.

There is also an adopted SPD for the Old Deer Park area, produced to support the then emerging 2018 Local Plan and the site allocations within this area. This SPD provides an integrated framework which supports the conservation, enhancement and management of the Old Deer Park as a historically important and well-used recreational and community area of the borough. It considers the historic attributes of the site, the relevant planning policy framework, the recreational and community activities, environmental considerations and identifies opportunities to support its maintenance and enhancement.

Other initiatives

The Council works with Kew Traders Network, supporting the range of independent shops, restaurants and cafes in the heart of the village. There are many locally organised events including Kew Village Market.

At the time of writing, there are active travel initiatives, including the implementation in 2021 of a cycle scheme on Kew Road, the potential for a new cycle hub at Kew Gardens and upgrades to the Kew Gardens Station footbridge including improved accessibility.

Vision

The vision for Kew is to maintain its character as a residential area. Kew Gardens Station will continue to provide a lively shopping centre for residents and visitors, with local shops and services at Kew Green and Sandycombe Road.

The setting of the Royal Botanic Gardens, Kew World Heritage Site will be protected and enhanced, to conserve its outstanding universal value. There are opportunities to sustain the significance of the historic landscape of the Old Deer Park and the features it contains, as well as supporting its wildlife, nature conservation and climate change role, whilst also improving the Park for sports, recreation and community use, with enhanced access.

There is an opportunity through new development at Kew Retail Park to improve the character at East Kew and improve green links to the River Thames.

Policy

Future development in this place is expected, where relevant, to:

- **Conserve the high-quality, traditional, frontages along the parade area by Kew Gardens Station, with opportunities for retaining and enhancing the "spill-out" of venues, including restaurants, cafés and pubs, to maintain a sense of activity and vibrancy.**
- **Improve wayfinding at the Station and across the town centre to places of interest such as Sandycombe Road, National Archives and the Royal Botanic Gardens, Kew.**
- **Preserve the openness of the parklands and the riverside, by resisting development which would affect this perception, and restoring historic elements where appropriate.**
- **In areas deficient in access to Public Open Space, consider opportunities to improve access to existing spaces, either through design and public realm improvements, or where opportunities arise, provide new publicly accessible open space. Where open spaces are currently not publicly accessible, their availability for public access and use will be encouraged.**
- **Support greening through conserving and enhancing street trees and planted front gardens with shrubs, small trees and hedges with a focus on biodiversity improvements.**
- **Contribute to conserving and enhancing the Royal Botanic Gardens, Kew World Heritage Site and surrounds in accordance with Policy 32 Royal Botanic Gardens, Kew World Heritage Site.**
- **Contribute to conserving and enhancing the significance of the Old Deer Park historic landscape and its features, as set out in the Old Deer Park SPD, including strengthening the southern boundary to reduce the impact and potential encroachment of sports developments, adjacent townscape, and Twickenham Road, on the registered park and garden and conservation area. Support the continued sporting and complementary uses at Pools on the Park and surroundings and Richmond Athletic Association Ground, Old Deer Park.**
- **Improve and transform parts of East Kew by improving the sense of place, public access and legibility, along with establishing more green infrastructure, particularly street trees.**
- **Enhance the connectedness of the Thames Path route within the wider Kew townscape and to the adjacent open spaces.**
- **Contribute to promoting active travel and reducing the dominance of vehicle traffic, including along Mortlake Road (A205) and Kew Road (A307) to reduce their severing impact.**

There are opportunities in parts of East Kew for development to positively contribute to improving the character and addressing negative qualities, creating a sense of activity with an inviting public realm as part of a coherent strategy, to improve permeability and active travel links. At Kew Retail Park (Site Allocation 31) there is the opportunity for comprehensive residential-led redevelopment to include a range of commercial uses, improve the public realm, active travel and links to the River Thames. There is a tall building zone opportunity (7 storeys), surrounded by a mid-rise buffer to provide for a transition to the more modest surrounding area, in accordance with Policy 45 Tall and Mid-Rise Building Zones. Redevelopment at Kew

Biothane (Site Allocation 32) is expected to deliver a residential use with associated open space provision.The protection and enhancement of sporting uses and facilities is supported at Pools on the Park (Site Allocation 33) and Richmond Athletic Ground (Site Allocation 34) at the Old Deer Park.

See details in the Site Allocations within this area:

- Kew Retail Park, Bessant Drive, Kew
- Kew Biothane Plant, Mellis Avenue, Kew
- Pools on the Park and surroundings, Old Deer Park, Richmond
- Richmond Athletic Association Ground, Old Deer Park, Richmond

Statement Site Allocation 31

Kew Retail Park, Bessant Drive, Kew

CONTEXT: Proposed Site – Kew Retail Park, Bessant Drive, Kew. TW9 4AD			
Ward	Kew	**Site Area**	3.91 ha
Land ownership	3.91 ha	**CIL Band**	Richmond CIL: Kew – Higher MCIL: Band 1
Existing land uses	Retail and associated car park (Use Class E)		
Local Plan Place-Based Strategy	Kew	**Urban Design Study Area**	G3 East Kew Mixed Use
Village Plan Guidance	Character Area 14 'Kew Retail Park', Kew Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	None known	**Type of Centre**	None – out of centre
Transport / Highways	• PTAL 0-*2* 'worst *to poor*' • Kew Gardens Underground & Overground Station approximate 7minute walk, Mortlake Station approximate 22 minute walk • No Controlled Parking Zone	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Kew Retail Park, Bessant Drive, Kew. TW9 4AD			
	• Transport for London Road Network (TLRN) - Mortlake Road		
Flood Risk	• Flood Zones 2/3/3a • Surface Water Flooding (1 in 1000 chance) • Area Susceptible to Groundwater Flooding (>=75% risk) • Area Benefitting from Flood Defence – Environment Agency • Flood Alert Area – Environment Agency • Flood Warning Area – Environment Agency • Tidal Breach Inundation – Environment Agency	**Trees**	Four trees in southwest corner subject to TPO
Views	None		
Heritage Assets	None. Adjacent to site: • Conservation Areas - CA73 Burlington Avenue & West Park Road (150m to west) and CA74 Ruskin Avenue & Defoe Avenue (15m to north) • Listed Building – West Hall. West Hall Road (Grade II) (50m south) • Royal Botanical Gardens World Heritage Site (500m west)	**Access to Open Space / Nature**	• Townmead Kew & Kew Riverside (130m east) - Metropolitan Open Land (MOL), Other Open Land of Townscape Importance (OOLTI) and Public Open Space • Thames Kew East (180 east) - MOL, Site of Importance for Nature Conservation (SINC) • Offices of National Archives (150m north) - OOLTI
Relevant Planning History	None.		
Description of Current Site Character	Kew Retail Park is a large well-used purpose-built two-storey retail building comprising 7 units, together with associated surface-level car park to the west and south. Vehicular access is via Bessant Drive to the west with a servicing along the eastern side, and there is also pedestrian access via a small park off West Hall Road to the south. The site's boundary treatment cuts it off from the surrounding area, creating almost an island effect. JTP Architects have been consulting the public on a new mixed-use residential proposal for the site.		
Neighbour Context	The surrounding area is a mix of residential and other uses. To the east the site directly bounds Kew Riverside, a recent mixed-use residential-led development of townhouses and apartments up to 5 storeys. Richmond Medical Group occupies the ground floor of Rose House. Further east is the former Stag Brewery site which is designated in the Local Plan as a Site Allocation suitable for residential development. Planning permission was granted in 2020 for a 4-6 storey specialist extra care facility for the elderly comprising 88 units. Kew Meadows Path bounds the site to the west, beyond which are interwar 2-storey houses and also the Marlborough Trading Estate. 2-storey houses front the residential streets to the north within the CA74. The South Circular Road runs close to the site to the west. Further north is The National Archives.		

CONTEXT: Proposed Site – Kew Retail Park, Bessant Drive, Kew. TW9 4AD	
	The River Thames is located approximately 180m to the east of the site.

Vision: Proposed site - Kew Retail Park

The Council will support a comprehensive residential-led redevelopment of the site with a range of commercial uses, including retail, offices (with the provision of affordable workspaces), and leisure. The redevelopment should look to improve the public realm, active transport through the site and links to the River Thames.

- **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. The Council expects that a policy-compliant level of affordable housing is provided.**
- **Whilst the site is not located within a town or local centre, it has for many years proved to be a popular retail destination. It is expected that commercial uses will be retained on site. The mix of uses, such as retail, cafes and offices, should be curated so that they add to the vibrancy and vitality of the new community. The proposed office provision should provide affordable workspace for small and medium-sized companies. ~~Any new convenience retail provision should not exceed the floorspace of the existing units, to protect the existing local centre in Kew.~~ *Any mixed use scheme including retail, will require a Retail Impact Assessment where applicable, in accordance with Policy 18 (g).***
- **Any redevelopment proposal needs to take into account the site's proximity to the River Thames and high risk of flooding within a Flood Alert and Warning Area as designated by the Environment Agency.**
- **There is an expectation that any redevelopment provides new on-site Public Open Space in addition to any external amenity space requirements, delivering multi-functional benefits including for nature conservation and biodiversity value as well as for health and well-being of future occupants and users, including surrounding communities. There should be an improvement to the public realm through high-quality landscaping, which can enhance and improve the biodiversity of the site, noting that tree-lined avenues are typical of the area.**
- **Proposals should be designed to improve the connectivity and permeability of the site, creating connections with the Kew Riverside development and the River Thames where feasible.**
- **The Royal Botanic Gardens, Kew World Heritage Site will need to be taken into consideration when designing any future scheme.**
- **Car parking provision is expected to be in line with London Plan standards. The existing site is car orientated and any proposal should look to increase active travel through the site and towards Kew Gardens Station and the surrounding area.**
- **The applicant will be required to submit a full transport assessment completed in accordance with local and London-wi~~s~~*d*e guidance. The applicant is strongly advised to seek pre-application transport and highway safety advice from Council and TfL officers before completing their transport assessment.**
- **The Urban Design Study identifies part of the site as a tall building zone (7 storeys) surrounded by mid-rise buffer zones (5-6 storeys) to provide for an area of transition with the more modest surrounding buildings, in accordance with Policy 45 Tall and Mid-Rise Building Zones.**
- **Development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance in the Urban Design Study and Village Planning Guidance.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 32

Kew Biothane Plant, Melliss Avenue, Kew

CONTEXT: Proposed Site – Kew Biothane Plant, Melliss Avenue, Kew. TW9 4BD			
Ward	Kew	**Site Area**	0.69 ha
Land ownership	Private	**CIL Band**	Richmond CIL: Kew – Higher MCIL: Band 1
Existing land uses	Former biothane plant site (sui generis). Extant planning permission for residential care home (Use Class C2).		
Local Plan Place-Based Strategy	Kew	**Urban Design Study Area**	G3 East Kew Mixed Use
Village Plan Guidance	Character Area 15 'Biothane Plant', Kew Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	• Brownfield Land Register • Metropolitan Open Land • Thames Policy Area	**Type of Centre**	None – out of centre
Transport / Highways	• PTAL 0 'worst' • Kew Gardens Underground & Overground Station approximate 10 minute walk, Mortlake Station approximate 18 minute walk	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Kew Biothane Plant, Melliss Avenue, Kew. TW9 4BD			
	• No Controlled Parking Zone		
Flood Risk	• Flood Zones 2/3/3a • Critical Drainage Area • Surface Water Flooding (1 in 1000 chance) • Area Susceptible to Groundwater Flooding (>=75% risk) • Article 4 Direction – Fluvial and Tidal Hazard • Flood Alert Area – Environment Agency • Flood Warning Area – Environment Agency • Tidal Breach Inundation – Environment Agency	**Trees**	Numerous trees along eastern border subject to TPO
Views	None		
Heritage Assets	None.	**Access to Open Space / Nature**	• Townmead Kew (eastern section of site) - Metropolitan Open Land (MOL) • Kew Riverside (immediately south) - Other Open Land of Townscape Importance (OOLTI) • Thames Kew East (immediately east) - MOL, Site of Importance for Nature Conservation (SINC) • Offices of National Archives (260m northwest) - OOLTI
Relevant Planning History	An application for an 88 unit residential specialist extra care home of 4-6 storeys was granted planning permission at Committee 16/09/2020 (ref. 18/3310/FUL). ~~This permission has not been implemented.~~ *Works commenced on site but have not been completed.*		
Description of Current Site Character	The site was previously owned by Thames Water Utilities and served the Stag Brewery. Brewery operations ceased in 2015 and the site was declared surplus to requirements. The site is fully decommissioned and is now vacant. There is an extant planning permission granted in 2018 for a 88-unit residential specialist extra care home of 6 storeys, including leisure and social facilities. The eastern section of the site is MOL. The Open Land Review 2021 found this area, as part of the wider designation (Parcel 21 Mortlake Cemetery East, Townmead Kew and Thames Kew East), fulfils its role for MOL purposes. The site is accessed via Melliss Avenue to the west and fronts the River Tames and public tow path.		
Neighbour Context	The surrounding area is predominantly residential, with the exception of Kew Retail Park to the west. Scale of development in the immediate areas ranges from 3-5 storeys with taller residential riverside developments to the north of 6-7 storeys. Adjoining to the north of the site is the retained Thames Water facility with its associated structures and single-storey buildings, which remain in use and is fully enclosed by fencing and tree planting along its northern boundary. The 5-storey Terrano House (residential flats) is adjacent to the Thames Water facility to the north. Opposite, to the west of the site is a row of three-storey-storey terraced houses (owned by Metropolitan Thames Valley, formally Thames Valley Housing). 5-storey Maple House and Cedar House (residential flats) are adjacent to the terrace houses to the west. Adjoining to the south of the site		

CONTEXT: Proposed Site – Kew Biothane Plant, Melliss Avenue, Kew. TW9 4BD	
	are 4-storey terraced houses and Saffron House (residential flats) on Woodman Mews. The northeast of the site is approximately 5m from the Thames Water Sewage Pumping Station.

Vision: Proposed site - Kew Biothane Plant

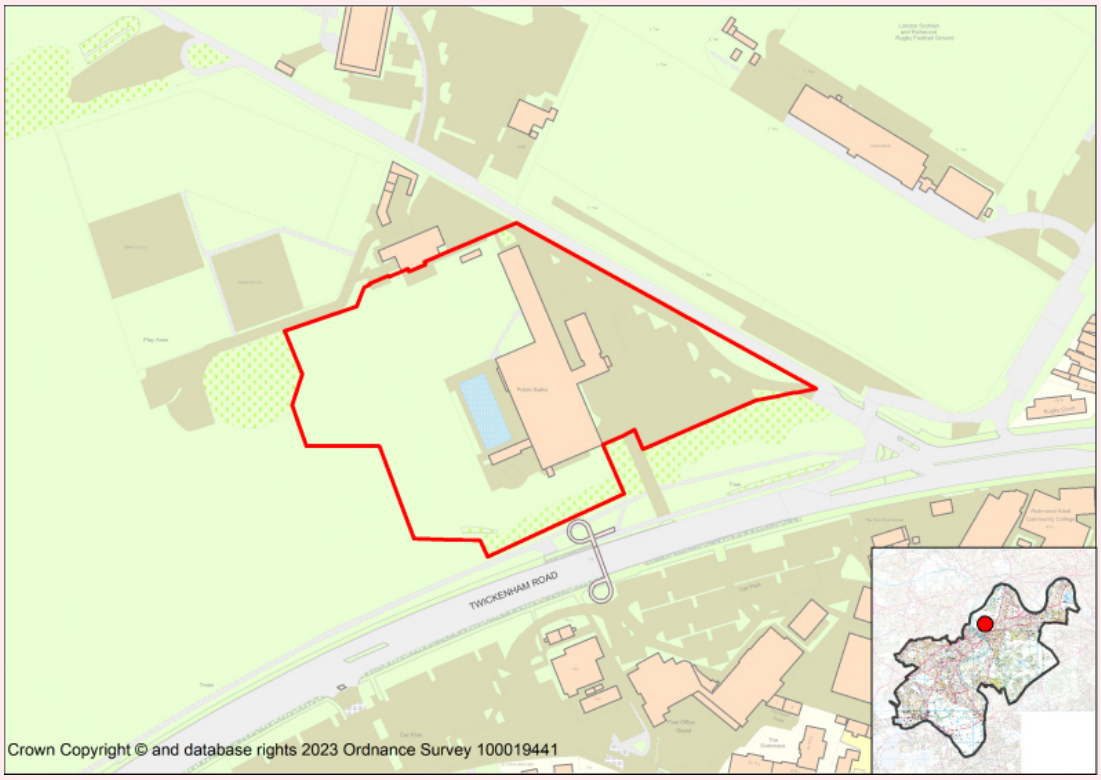
The Council will support redevelopment of this site to provide for residential uses, including affordable housing, and associated open space provision.

- **Due to its location in a largely residential area, redevelopment for housing, including affordable housing, is considered appropriate.**
- **The redevelopment of the site provides an opportunity to enhance the environment whilst meeting housing needs.**
- **A residential scheme would need to take into account the presence of the existing sewage treatment works to the north of the site and impact on residential amenities considered. The submission of an odour impact assessment would be requires*d* upfront.**
- **Parts of the site are designated as MOL and development in this area would not be acceptable. There is an expectation that any redevelopment proposal improves the character and openness of the MOL.**
- **There is an expectation that any redevelopment provides new on-site Public Open Space in addition to any external amenity space requirements, delivering multi-functional benefits including for nature conservation and biodiversity value as well as for health and well-being of future occupants and users, including surrounding communities.**
- **Development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance in the Urban Design Study and Village Planning Guidance.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 33

Pools on the Park and surroundings, Old Deer Park, Richmond



CONTEXT: Proposed Site – Pools on the Park and surroundings, Old Deer Park, Twickenham Road, Richmond. TW9 2SF			
Ward	North Richmond	**Site Area**	1.96 ha
Land ownership	Public	**CIL Band**	Richmond CIL: North Richmond – Higher MCIL: Band 1
Existing land uses	Indoor swimming baths and leisure facility and ancillary café (Use Class F2(d) and E(d)), outdoor swimming pool (Use Class F2(d) and associated grounds and car park		
Local Plan Place-Based Strategy	Kew	**Urban Design Study Area**	G1 Kew Gardens and Riverside
Village Plan Guidance	Character Area 18 and Conservation Area 57 'Old Deer Park', Richmond and Richmond Hill Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	Thames Policy Area	**Type of Centre**	None – out of centre

CONTEXT: Proposed Site – Pools on the Park and surroundings, Old Deer Park, Twickenham Road, Richmond. TW9 2SF			
Transport / Highways	• PTAL 5 'very good' • Richmond Station approximate 5 minute walk • Controlled Parking Zone • Primary Secondary Road – Twickenham Road	**Air Quality**	Air Quality Management Area
Flood Risk	• Flood Zone 1 • Critical Drainage Area • Surface Water Flooding (1 in 1000 chance) • Area Susceptible to Groundwater Flooding (>=75% risk) • Throughflow Catchment Area	**Trees**	Trees along southern boundary which are protected via CA57 though none subject to TPO
Views	• Protected View – View from St Margarets Promenade to Kew Pagoda • Indicative Protected View – View from towpath at Twickenham Bridge to Kings Observatory (indicative 20m buffer)		
Heritage Assets	World Heritage Site – Royal Botanic Gardens, Kew CA57 Old Deer Park Conservation Area Historic Park and Garden – Royal Botanical Gardens & Old Deer Park (Grade I) Archaeological Priority *Area:* Zone – Old Deer Park Listed Building (Grade II) Adjacent to site: • Conservation Areas - CA36 Kew Foot Road (160m east), CA17 Central Richmond (90m southeast), CA3 Richmond Green (160m south)	**Access to Open Space / Nature**	• Old Deer Park Sports (immediately east) - Metropolitan Open Land (MOL), (80m north) Site of Importance for Nature Conservation (SINC) • Old Deer Park Rec and Old Deer Park (immediately south) - MOL and Public Open Space
Relevant Planning History	None.		
Description of Current Site Character	Richmond Public Baths, known as 'Pools on the Park', is a part 2 part 1 storey Grade II Listed Building which houses two indoor swimming pools and health and leisure facilities, set within the Old Deer Park. Outside is an open-air lido, terrace and viewing deck. There is a café on site. To the west are landscaped amenity areas and to the east is a car park, accessed via Twickenham Road (A316) to the south. Section 5 of the Old Deer Park SPD includes details of the significance of the listed status of the Pools complex		
Neighbour Context	Old Deer Park surrounds the site. Behind the site is a nursery school which forms part of the building also containing the Recreation Ground changing facilities. To the northwest are hard and grass tennis courts and children's play areas. Further north is the Royal Mid Surrey Golf Club and course. To the east is the London Scottish and Richmond Rugby Football Ground.		

CONTEXT: Proposed Site – Pools on the Park and surroundings, Old Deer Park, Twickenham Road, Richmond. TW9 2SF	
	Beyond Twickenham Road to the south the area is more built up. The character is mixed and includes Richmond Adult Community College, The Bridge Workspace, Royal Mail Delivery Office Richmond Green other retail and residential properties typically 2 storeys in height.

Vision: Proposed site - Pools on the Park and surroundings, Old Deer Park, 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. Any proposal would need to be fully justified having assessed the significance of the building and its setting, and having taken into account the wider heritage designations that apply to the site.

- **The Council's Indoor Sports Facility Needs Assessment 2015 (due to be updated 2023) states that there is a concern regarding the aging stock on this site and that 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. Further, the future population growth of the borough will place additional 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 standards in other membership facilities.**
- **The SPD for the overall Old Deer Park (aligned to the Conservation Area boundary) sets out (in section 4) that Pools on the Park is an important public facility, for swimming and health and fitness facilities, and recognises the issues relating to the complex and age of the facility.**
- **As the existing Pools complex is Grade II Listed and the site lies within a Grade I Historic Park and Garden, Conservation Area and the Royal Botanic Gardens, Kew World Heritage Site buffer zone, it is important that any proposals are considered within the context of these designations. Any proposal will need to take into account the Old Deer Park SPD, demonstrating how an understanding of the significance of the listed status of the Pools complex has informed any scheme, and ensuring that it respects the significance having regard to the draft Statement of Significance for the site.**
- **Looking at the Park as a whole, the Old Deer Park SPD sets out opportunities to sustain the significance of the historic landscape of the Park and the features it contains, as well as supporting its wildlife and nature conservation role, improving the sports, recreation and community facilities and enhancing access into and around the Park. Any proposal will need to take into account the SPD and ensure that any prospective development is sensitive to the historic landscape of the Park and its features.**
- **Development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance in the Urban Design Study and Village Planning Guidance.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 34

Richmond Athletic Association Ground, Old Deer Park, Richmond

CONTEXT: Proposed Site – Richmond Athletic Association, Old Deer Park, Twickenham Road, Richmond. TW9 2SF			
Ward	North Richmond	**Site Area**	9.93 ha
Land ownership	Public	**CIL Band**	Richmond CIL: North Richmond – Higher MCIL: Band 1
Existing land uses	Outdoor sports grounds (Use Class F2(c)) and associated structures		
Local Plan Place-Based Strategy	Kew	**Urban Design Study Area**	G1 Kew Gardens and Riverside
Village Plan Guidance	Character Area 18 and Conservation Area 57 'Old Deer Park', Richmond and Richmond Hill Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	• Metropolitan Open Land • Thames Policy Area	**Type of Centre**	None – out of centre

CONTEXT: Proposed Site – Richmond Athletic Association, Old Deer Park, Twickenham Road, Richmond. TW9 2SF			
Transport / Highways	• PTAL 5 'very good' • Richmond Station approximate 9 minute walk • Controlled Parking Zone N – Northeast Richmond • Primary Secondary Road – Twickenham Road	**Air Quality**	Air Quality Management Area
Flood Risk	• Flood Zone 1 • Surface Water Flooding (1 in 100 chance) • Area Susceptible to Groundwater Flooding (>=75% risk) • Throughflow Catchment Area	**Trees**	Trees protected via CA57 though none subject to TPO
Views	• Indicative Protected View – View from towpath at Twickenham Bridge to Kings Observatory (indicative 20m buffer)		
Heritage Assets	World Heritage Site – Royal Botanic Gardens, Kew CA57 Old Deer Park Conservation Area Historic Park and Garden – Royal Botanical Gardens & Old Deer Park (Grade I) Archaeological Priority *Area:* Zone – Old Deer Park Listed Building – Pavillion (Grade II) Adjacent to site: • Conservation Area - CA36 Kew Foot Road (immediately east) • Listed Buildings – Richmond Royal Hospital, 12 & 14, 19-23, 39 Kew Foot Road (immediately east) (Grade II), Swimming Baths, Old Deer Park (immediately west) (Grade II) • Buildings of Townscape Merit (BTMs) - various buildings fronting Kew Foot Road (immediately east)	**Access to Open Space / Nature**	• Old Deer Park Sports - Metropolitan Open Land (MOL) and (immediately north) Site of Importance for Nature Conservation (SINC) • Old Deer Park Rec (immediately west) - MOL and Public Open Space • Michels Row (80m east) - Other Open Land of Townscape Importance (OOLTI) and Public Open Space
Relevant Planning History	None.		
Description of Current Site Character	The site is home to the London Scottish Football Club and comprises 7 pitches, a 1950s grandstand and Grade II Listed pavilion, and includes changing facilities and a health and fitness facility. The grandstand is one of few cantilevered grandstands erected in Britain before the 1970s and the only British example of a reinforced concrete grandstand seen more commonly in post-war Continental Europe. The whole site is designated as MOL. The Open Land Review 2021 found this area, as part of the wider designation (Parcel 24 Old Deer Park & Kew Gardens) fulfils its role for MOL purposes. Access is via Twickenham Road (A316) to the south.		

CONTEXT: Proposed Site – Richmond Athletic Association, Old Deer Park, Twickenham Road, Richmond. TW9 2SF	
Neighbour Context	Old Deer Park surrounds the site to the west, north and east. Separated by an access road the west is Pools on the Park indoor pools and lido complex and associated car park. To the northwest is the Royal Mid Surrey Golf Club and golf course to the north. Further east is the Mid-Surrey Bowling Club and grounds. The site is bounded by Kew Foot Road which runs to south to west, beyond which the area is predominantly residential and low rise.

Vision: Proposed site - Richmond Athletic Association, Old Deer Park, 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 could be incorporated provided they have been fully justified as being necessary to support the continued sporting uses on the site, that they demonstrate meeting identified needs, do not detract from the main use of the site as a sports ground, and have been developed to take account of the Metropolitan Open Land (MOL) and historic designations.

- **The evidence as set out in the Council's Playing Pitch *and Outdoor Sports* Strategy (~~2015~~ *2023*) suggests that the sports ground needs to be retained; however, improvements *to pitch quality* are required ~~in relation to the existing facilities~~, including *consideration of additional sports lighting on the seven senior pitches to eradicate 'overplay'* ~~to the changing facilities and the quality of the playing pitches as a result of them currently being 'overplayed'~~. The recent Action Plan updates have not identified any significant change to the situation, although ~~the evidence base is due to be~~ *these are regularly* updated ~~in 2023~~.**
- **The Council supports the principal of improvement and upgrading of facilities to support the sports uses on this site.**
- **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 scheme, any such development would be to be clearly justified, be for associated leisure and/or other complementary uses, and provide for a comprehensive development approach for the whole site. Development must also demonstrate that the character and appearance of the site, as well as its historic significance, is improved and enhanced.**
- **The whole site is designated as MOL and therefore inappropriate development would not be acceptable.**
- **As the pavilion is Grade II Listed and the site lies within a Grade I Historic Park and Garden, Conservation Area and the Royal Botanic Gardens, Kew World Heritage Site buffer zone, it is important that any proposals are considered within the context of these designations. Any proposal will need to take into account the Old Deer Park SPD and demonstrate how an understanding of the significance of the listed status of the pavilion has informed any scheme.**
- **The Old Deer Park SPD sets out (section 4) the existing indoor and outdoor provision at the site, including the pitches and the health and fitness facility. Opportunities for improvement are identified (in section 5) including the details that would need to be addressed in any proposal for redevelopment of the grandstand or any reconfiguration of the pitches.**
- **Looking at the Park as a whole, the Old Deer Park SPD sets out opportunities to sustain the significance of the historic landscape of the Park and the features it contains, as well as supporting its wildlife and nature conservation role, improving the sports, recreation and community facilities and enhancing access into and around the Park.**

Any proposal will need to take into account the SPD and ensure that any prospective development is sensitive to the historic landscape of the Park and its features.

- **Development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance in the Urban Design Study and Village Planning Guidance.**

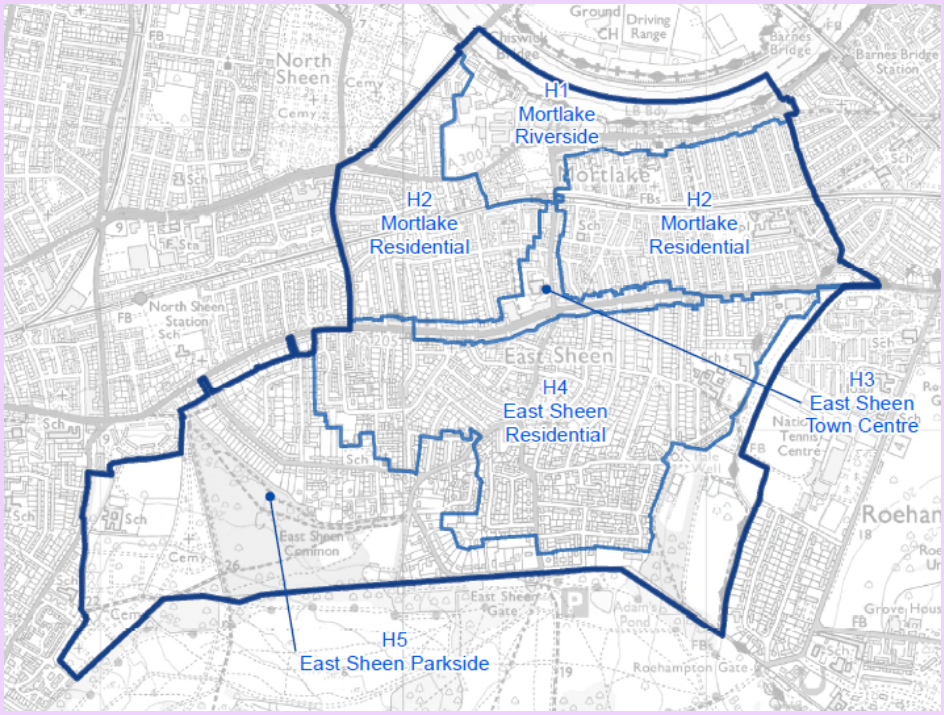
Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

13 Place-based Strategy for Mortlake & East Sheen

Policy PBS8 Place-based Strategy for Mortlake & East Sheen

Area Profile

The Mortlake & East Sheen area encompasses East Sheen Town Centre, with East Sheen Residential and East Sheen Parkside, along with Mortlake Residential and Mortlake Riverside. These are character areas H1, H2, H3, H4 and H5 and in the Urban Design Study.



This area is predominantly residential, between the River Thames and Richmond Park. Towards Richmond Park there are attractive tree-lined streets with large houses, whereas north of Upper Richmond Road West the character is formed by terraced cottages and houses.

Across this area Sheen Common and Palewell Common provide unique open areas for a range of recreational activities and important wildlife habitats, along with Mortlake Common and the open space along the River Thames between Chiswick Bridge and Barnes – with the Varsity Boat Race traditionally ending at Mortlake.

The Mortlake (Stag) Brewery is a prominent part of the area's heritage. It is a significant development opportunity in the borough, since brewing operations ceased at the end of 2015. There are historic assets, the former bottling building, the Maltings building and the former hotel building, along with historic brick boundary structures that survive.

The centre of East Sheen is bisected by Upper Richmond Road West (A205 South Circular) and inevitably this has a major impact on its appearance and character. Identified as a district centre in the borough's centre hierarchy and the London Plan (see section 6 of the Plan), there is a mix of multiple and specialist shops, pubs, restaurants, cafes and a range of community facilities at the Sheen Lane Centre. The London Plan recognises existing office functions, generally within smaller units, should be protected, albeit that the area has medium commercial growth potential.

Mortlake now has limited shops and services on Mortlake High Street. There is a neighbourhood centre at White Hart Lane.

The area as a whole is relatively well-connected, which includes Mortlake Station, although the railway lines and level crossings also form barriers to movement.

As part of the Urban Design Study consultation in 2021 on what local people valued in their area, Mortlake Residential (H2) received moderately high scores for attractiveness, green spaces, shops and restaurants and community spirit. The highest scores received for East Sheen Town Centre (H3) were for its shops and restaurants, green spaces, vibrancy and community spirit. East Sheen Residential (H4) received consistently high scores across most features. East Sheen Common and Residential (H5) received particularly high scores for its attractiveness, tranquillity and shops and restaurants.

Overall strategy

Overall, the Urban Design Study sets out that Mortlake Riverside (H1) has a distinctive sense of place and heritage, with an overall high sensitivity to change, but its character risks being undermined by inconsistent building typologies, the dominating presence of main roads i.e. Lower Richmond Road and Mortlake High Street, and its increasing disconnect from the River Thames. For this area, the strategy aims to conserve and enhance the area's existing valued features and heritage assets, and to restore Mortlake's historical prominence and relationship with the Thames. Mortlake Residential (H2) has an overall high sensitivity to change, with an existing distinctive character and coherent townscape, and the strategy is to conserve and enhance the character. East Sheen Town Centre (H3) is considered to have a fair sense of place and heritage with a high sensitivity to change overall, although the western part of the town centre has relatively lower sensitivity. It is recognised that the quality and functioning of the area as a town centre has been negatively impacted by several unsympathetic developments, the dominance of vehicle traffic along the South Circular and the loss of coherence in shop frontages. The strategy is therefore to restore the historic character and improve its public realm and sense of identity, particularly along Upper Richmond Road to make it a more attractive destination. East Sheen Residential (H4) has a strong existing character and the townscape is well-maintained with a good quality of architecture, with a high sensitivity to change. The strategy is to conserve the character, elements and features, whilst enhancing appropriate areas. East Sheen Parkside (H5) has a strong existing character and a high sensitivity to change. The strategy is to conserve the character, whilst enhancing particular features in order to strengthen the area's future resilience. The Urban Design Study contains design guidance for each character area and for Richmond borough's Riverside.

Other initiatives

The Council works with the East Sheen Business and Retail Association (ESBRA) who work closely with the community dealing with local issues such as parking and funding new projects for all to keep the high street vibrant.
Transport for London's Cycling Action Plan has highlighted opportunities for additional cycle corridors and identified a top potential route through Sheen and Mortlake into the neighbouring borough of Wandsworth.

Vision

The vision for Mortlake is to create a new focus to the village by redevelopment of the Stag Brewery site, creating a recreational and living quarter and a link between the village and the riverside.
The vision for East Sheen is to retain the established character of the area, to maintain and enhance the district centre, providing shops, services and employment for the local communities. There is also the potential to make Milestone Green the centre of East Sheen.

Policy

Future development in this place is expected, where relevant, to:

- **Contribute to a sense of activity and vibrancy in the town and neighbourhood centres, retaining the mix of uses including restaurants, cafes and pubs along Sheen Lane and at the junction of Mortlake High Street and White Hart Lane, to maintain a sense of activity and vibrancy, and encourage independent shops and businesses, emphasising local makers and artisans. Encourage reinstatement of shopfronts' original design to achieve consistency in appearance in East Sheen Town Centre.**
- **Enhance the sense of arrival and quality of the public realm at Mortlake Station, including improved accessibility through opportunities for art and wayfinding.**
- **Incorporate focal points and establish distinctive landmarks, without recourse to tall buildings, including in East Sheen Town Centre to enhance the sense of place and the area's identity as a destination, such as the space around the war memorial.**
- **Contribute to creating a 'centre' for East Sheen at Milestone Green.**
- **Enhance the public realm and create public areas for dwelling and "spill-out", rather than narrow, transient spaces, using high-quality street furniture, and increase greening through tree planting and verges.**
- **Ensure new development along the river contributes to its valued leisure functions as well as positively addressing Mortlake High Street. Enhance local distinctiveness around Mortlake Riverside using its relationship with the river and historic industry, and improve the riverside environment.**
- **Enhance continuity, connectedness and legibility of the Thames Path route, to improve connectivity with the wider area.**
- **At East Sheen Parkside, enhance the quality and biodiversity of East Sheen Common and ensure green infrastructure is physically connected, notably along Fife Road, The Mall and Spencer Gardens, and improve boundary treatments and interface with Christ's School.**
- **Consider opportunities to reduce the perceived dominance of vehicles, promoting active travel with space to create café seating areas and improve pedestrian experience in East Sheen Town Centre and at Mortlake Riverside.**

There are site opportunities for new development in this area. Within the town centre boundary there is some potential where the townscape is less intact for development to restore the historic character. The Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen (Site Allocation 37) is an opportunity - if the telephone exchange is declared surplus to requirements

– to contribute to the vitality and viability of the centre via a mixed-use scheme. Towards Mortlake High Street, there is a similar opportunity - if the Mortlake and Barnes Delivery Office, Mortlake (Site Allocation 36) becomes surplus - for employment or other commercial and retail uses.

At Stag Brewery (Site Allocation 35) there is a significant opportunity to create a new quarter for living, with recreational and commercial uses to generate vibrancy, local employment, community and leisure opportunities. The redevelopment should create vibrant links between the River and the town, enlivening the Riverside frontage and Mortlake High Street, to transform Mortlake while respecting the character and history of the area. There is an opportunity to accommodate tall buildings within the sensitivities of the surrounding context, in accordance with Policy 45 Tall and Mid-Rise Building Zones.

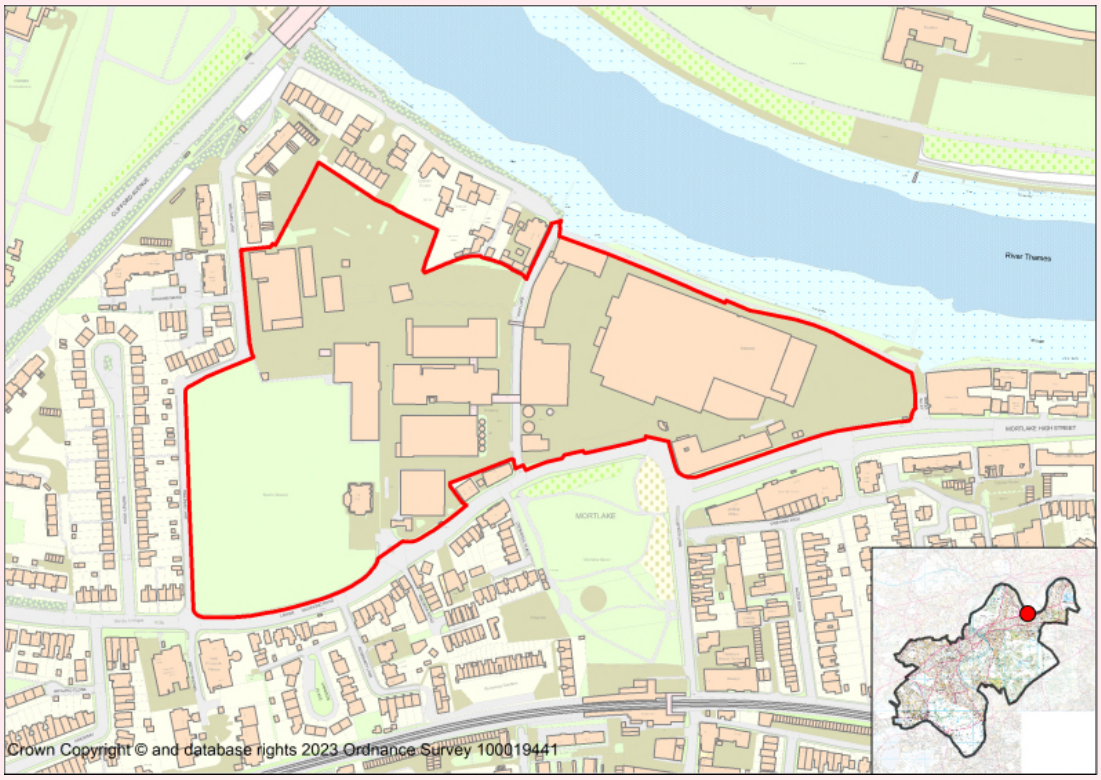
At Barnes Hospital (Site Allocation 38) redevelopment is expected to provide a new Special Educational Needs (SEN) school and health centre, along with residential.

See details in the Site Allocations within this area:

- Stag Brewery, Lower Richmond Road, Mortlake
- Mortlake and Barnes Delivery Office, Mortlake
- Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen
- Barnes Hospital, East Sheen

Statement Site Allocation 35

Stag Brewery, Lower Richmond Road, Mortlake



CONTEXT: Proposed Site – Stag Brewery, Lower Richmond Road, Mortlake. SW14 7ET			
Ward	Mortlake & Barnes Common	**Site Area**	8.77 ha
Land ownership	Private (though includes a public towpath)	**CIL Band**	Richmond CIL: North Mortlake & Barnes Common – Higher MCIL: Band 1
Existing land uses	Former brewery with associated industrial buildings (Use Class B2); outdoor playing field (Use Class F2), Temporary permission for film production and associated uses.		
Local Plan Place-Based Strategy	Mortlake & East Sheen	**Urban Design Study Area**	H1 Mortlake Riverside
Village Plan Guidance	Character Area 7 'Stag (Mortlake) Brewery', Mortlake Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	• Brownfield Land Register • Thames Policy Area (adjacent)	**Type of Centre**	None – out of centre

CONTEXT: Proposed Site – Stag Brewery, Lower Richmond Road, Mortlake. SW14 7ET			
Transport / Highways	• PTAL 2 'poor' • Mortlake Station approximate 5 minute walk • No Controlled Parking Zone N • Local Distributor Road / Crown road • Primary Secondary Road – Williams Lane	**Air Quality**	• Air Quality Management Area • Air Quality Focus Area (adjacent)
Flood Risk	• Flood Zone 2/3a • Surface Water Flooding (1 in 30 chance) • Area Susceptible to Groundwater Flooding (>=50-75 <75% risk) • Area Benefitting from Defences – Environment Agency • Flood Alert Area – Environment Agency • Flood Warning Area – Environment Agency • Tidal Breach Inundation – Environment Agency	**Trees**	Number of trees along southern boundary and to north of site subject to TPO, TPO Area Group Wood (T0880)
Views	• View Protected Indicative Zone – View 2A West Mortlake • View Protected Indicative Zone – View 3 Chiswick Bridge Southeast View		
Heritage Assets	Archaeological Priority *Area:* Zone – Mortlake Conservation Area – CA33 Mortlake (small parts of east of site) Listed Building: • Garden Wall to East of 1-8 Riverside House and Extending Behind 1-24 Reid Court Williams Lane (Grade II) Buildings of Townscape Merit (BTMs): • The Maltings Building • Bottling plant Building • Former Hotel Building Adjacent to site: • Conservation Areas - CA51 Mortlake Green (immediately south), CA33 Mortlake (immediately south) • Listed Buildings – Riverside House, Leyden House, Thames Bank House, Tudor Lodge, Thames Bank Cottages, Thames Bank (Grade II) (immediately north), Gateway Formerly to Cromwell House, Williams Lane (Grade II)	**Access to Open Space / Nature**	• Mortlake Brewery Ground – Other Open Land of Townscape Importance (OOLTI) • Thames Barnes West (immediately north)- Metropolitan Open Land (MOL) and Site of Importance for Nature Conservation (SINC) • Towpath Mortlake, Barnes Bridge (immediately north) - Public Open Space • Mortlake Green (immediately south) - OOLTI and Public Open Space • Mortlake Cemetery East (100m west) - MOL • Kew Meadow Cemetery (100m west) - SINC • Chertsey Court, on Richmond Road (85m west) - OOLTI

CONTEXT: Proposed Site – Stag Brewery, Lower Richmond Road, Mortlake. SW14 7ET			
	(immediately west), Chiswick Bridge and Attached Balustrades, Great Chertsey Road (Grade II) (80m north) • BTMs - various buildings fronting Parliament Mews and Thames Bank (immediately north), 61-69 Mortlake High Street (immediately east), various buildings fronting Lower Richmond Road and Mortlake Training Centre (immediately south)		
Relevant Planning History	• Two planning applications were submitted jointly for: Application A (ref. 18/0547/FUL) - demolition of all buildings except The Maltings and façade of Bottling Plant and former Hotel and comprehensive phased redevelopment for residential flats, flexible-use space for commercial/community/leisure, new hotel, cinema, gym, office floorspace, and nursing/care home with flexible use living accommodation; Application B (ref. 18/0548/FUL) – new secondary school and sixth form, floodlit sports pitch, MUGA and play space. Planning permission granted by Richmond Planning Committee was overturned by the GLA in August 2021 on the following grounds: Height, massing and visual impact; heritage impact; neighbouring amenity impact; overall absence of a legal agreement; open space, transport mitigation, comprehensiveness and place-making. • The site was granted temporary planning permission for 2 years on 12/06/2020 for film-production and associated uses (ref. 19/3870/FUL). An application to extend the permission by 5 years is currently under consideration (ref. 22/1860/FUL). • There are 2 live planning applications for outline and full permission for a phased redevelopment of the site for demolition, extensions and new buildings (3-9 storeys) for a mixed-use scheme comprising residential, flexible-use space (retail, offices), cinema, hotel/pub and secondary school and sixth form college - Livingstone Academy (refs. 22/0900/OUT & 22/0902/FUL).		
Description of Current Site Character	The site sits on the River Thames and was formerly home to Stag Brewery until 2015 when operations ceased, since when the site has been declared surplus to requirements and sold. It comprises a number of industrial buildings associated with the brewery, 3 of which are BTMs and historical – the former Maltings building and former Bottling building and Hotel on Mortlake High Street. The remainder of the buildings are more modern and utilitarian. The site also comprises a private playing field, designated as OOLTI, and associated sports pavilion. The site is separated by Ship Lane which runs north south through the centre. The towpath is the Port of London's ownership and forms part of the Thames Path National Trail and Definitive Public Footpath (PROW55). The site is bound by Williams Lane to the west, Lower Richmond Road and Mortlake High Street to the south, Bulls Alley to the east and the River Thames to the north. Access is ~~boa~~ *via* Lower Richmond Road, Williams Lane and Ship Lane. ~~There are currently 2 live planning applications under consideration for outline and full permission for a phased redevelopment of the site for demolition, extensions and new buildings (3-9 storeys) for a mixed-use scheme comprising residential, flexible-use space (retail, offices), cinema, hotel/pub and secondary school and sixth form college.~~ *Planning Committee resolved to grant full and outline planning permission on 18/07/2023 (application refs. 22/0900/OUT & 22/0902/FUL) for a phased redevelopment of the site for demolition, extension and new buildings (3-9 storeys) for a mixed-use scheme comprising residential, flexible-use space (retail, offices café/restaurant, drinking establishment, non-residential institutions and community use and boathouse), hotel/pub, cinema and secondary school and sixth form. Appeal Lodged on 28/02/2024.*		
Neighbour Context	The site is located in a highly sensitive area with a number of heritage assets and open land and conservation designations nearby. The surrounding area is predominantly residential and low-rise		

CONTEXT: Proposed Site – Stag Brewery, Lower Richmond Road, Mortlake. SW14 7ET	
	with some commercial and retail uses on Lower Richmond Road and Mortlake High Street. West of the site is Chiswick Bridge (A316).

Vision: Proposed site - Stag Brewery

The Council will support the comprehensive redevelopment of the site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new 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 additional to educational, include residential (including affordable housing), employment, commercial such as retail and other employment generating uses, health facilities, community and infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and/or reprovision and upgrading of the playing fields. 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.

- **Any proposed development should have due regard to the adopted Stag Brewery Planning Brief SPD 2011, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities.**
- **There is a need to create a new heart for Mortlake, which should add to the viability and vitality of this area, for 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 the area, as set out in the Council's School Place Planning Strategy. The Council therefore expects any redevelopment proposal to allow for the provision of this school.**
- **~~Whilst this site is not located within a town centre, it falls within the Mortlake Area of Mixed Use.~~ It is ~~therefore~~ expected that this site will provide a substantial mix of employment 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 cafes 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, should contribute to creating an inviting and vibrant new centre.**
- **The provision of residential uses (including policy-compliant affordable housing) will ensure that the new heart of Mortlake becomes a vibrant centre for new communities.**
- **In addition to any future development having to achieve 'Air Quality Positive', strict mitigation measures will be required, both to mitigate any effect on current receptors and highways and on future receptors within the proposed development, particularly for sensitive receptors, such as students at the secondary school.**
- **Links through the site, including a new green space and high-quality public realm link between the River Thames and Mortlake Green, provide the opportunity to integrate the development and new communities within the existing Mortlake community.**
- **The designated playing fields to the southwest corner of the site should be retained and/or reprovided and upgraded. In the event of reprovision and upgrading, where a comprehensive approach to redevelopment can be taken in line with Policy 36. Other Open Land of Townscape Importance, it may be acceptable to re-distribute designated**

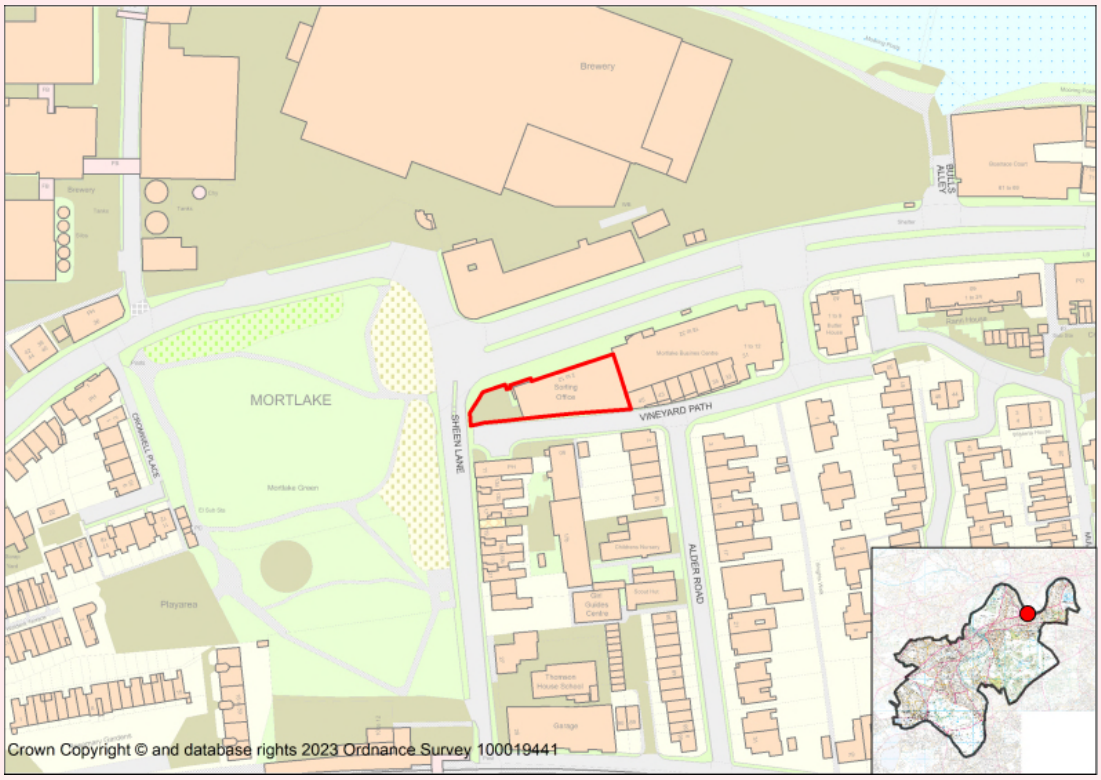
OOLTI within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness. In addition, reprovision and upgrading of the playing fields within the site for sport uses has to be carried out in line with Policy 37. Public Open Space, Play, Sport and Recreation, the NPPF and Sport England policy.

- **The adopted Stag Brewery development brief identifies a number of transportation and highway issues. The Council will expect the developer to work together with relevant partners, including TfL, to ensure that where necessary improvements to sustainable modes of travel, including public transport facilities, are secured as part of any development proposal. The opportunity to relocate the bus stopping/turning facility from Avondale Road bus station to this site should be investigated, if appropriate, as part of a comprehensive redevelopment.**
- **The existing BTMs 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. Any development should respond positively to the Conservation Area, including the setting of the Listed Buildings to the north of the site.**
- **There is potential in the tall building zone (7 storeys), with a mid-rise zone buffer (5-6 storeys), in accordance with Policy 45. Tall and Mid-Rise Building Zones, noting that the Urban Design Study recognises the limits due to the sensitivities of the surrounding context.**
- **Development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance in the Urban Design Study and Village Planning Guidance.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 36

Mortlake and Barnes Delivery Office, Mortlake



CONTEXT: Proposed Site – Mortlake and Barnes Delivery Office, 2-12 Mortlake High Street, Mortlake, SW14 8JB			
Ward	Mortlake & Barnes Common	**Site Area**	0.08 ha
Land ownership	Private	**CIL Band**	Richmond CIL: North Mortlake & Barnes Common – Higher MCIL: Band 1
Existing land uses	Royal Mail delivery office (Use Class Sui Generis)		
Local Plan Place-Based Strategy	Mortlake & East Sheen	**Urban Design Study Area**	H1 Mortlake Riverside
Village Plan Guidance	Character Area 3 'Mortlake High Street', Mortlake Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	Brownfield Land Register	**Type of Centre**	None – out of centre
Transport / Highways	• PTAL 2 'poor' • Mortlake Station approximate 2 minute walk • Controlled Parking Zone M - Mortlake • Local Distributor Road / Crown road	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Mortlake and Barnes Delivery Office, 2-12 Mortlake High Street, Mortlake, SW14 8JB			
Flood Risk	• Flood Zone 2/3a • Critical Drainage Area • Surface Water Flooding (1 in 1000 chance) • Area Susceptible to Groundwater Flooding (>=75% risk) • Area Benefitting from Defences – Environment Agency • Flood Alert Area – Environment Agency • Flood Warning Area – Environment Agency • Tidal Breach Inundation – Environment Agency	**Trees**	None. There are some street trees of high amenity value on Mortlake High Street which are not protected.
Views	None		
Heritage Assets	Archaeological Priority *Area:* Zone – Mortlake Adjacent to site: • Conservation Areas - CA51 Mortlake Green (immediately south and west), CA33 Mortlake (15m north) • Buildings of Townscape Merit (BTMs) – 11 Sheen Lane, 50 Vineyard Path (immediately south), Brewery Building, Ship Lane (25m north)	**Access to Open Space / Nature**	Mortlake Green (immediately west) - Other Open Land of Townscape Importance (OOLTI) and Public Open Space
Relevant Planning History	None.		
Description of Current Site Character	The site comprises a 3-storey flat roofed building fronting Mortlake High Street, which operates as a Royal Mail sorting office. The site is subject to an Article 4 Direction (Site 48) restricting change of use from Use Class E (commercial) to residential. The building itself is not considered to be of any architectural merit. Vehicular access to the site is via Vineyard Path to the rear. As of 2023, Royal Mail has no plans to relocate its operations.		
Neighbour Context	The site is site is adjacent to two Conservation Areas and Mortlake Green to the west. Further north is the former Stag Brewery site. Mortlake Business Centre adjoins the site to the east, with 3-storey apartment blocks adjoining to the rear. To the south of the site the character of the area becomes predominantly residential and more intimate in scale, with the majority of nearby residential dwellings within the Conservation Area being BTMs.		

Vision: Proposed site - Mortlake and Barnes Delivery Office

In the event that the site is declared surplus to requirements by Royal Mail, appropriate land uses include employment or other commercial and retail uses.

- **Evidence suggests there is a need for employment or other commercial and retail uses in this part of Mortlake, within the Council's Class E to residential Article 4 Direction (Site 48). Such provision should create an attractive frontage to the High Street.**
- **The provision of housing (including affordable housing) in upper floors may be considered as part of an employment-led mixed-use scheme where the existing employment use is retained and intensified (to include other commercial or**

employment-generating uses). 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 as part of a mixed-use scheme be considered as a potential redevelopment option.

- **Development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance in the Urban Design Study and Village Planning Guidance.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 37

Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen

CONTEXT: Proposed Site – Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen. SW14 8AW			
Ward	East Sheen	**Site Area**	0.44 ha
Land ownership	Private	**CIL Band**	Richmond CIL: East Sheen – Higher MCIL: Band 1
Existing land uses	Telephone exchange (sui generis); commercial and gym (Use Class E)		
Local Plan Place-Based Strategy	Mortlake & East Sheen	**Urban Design Study Area**	H3 East Sheen Town Centre
Village Plan Guidance	Character Area 6 'Church Avenue / Vernon Road', East Sheen Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	Brownfield Land Register	**Type of Centre**	East Sheen ~~Main~~ *Town* Centre (majority of site)
Transport / Highways	• PTAL 3 'moderate' • Mortlake Station approximate 8 minute walk • Controlled Parking Zone ES – East Sheen • Primary / Secondary Road	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen. SW14 8AW			
Flood Risk	• Flood Zone 1 • Critical Drainage Area • Surface Water Flooding (1 in 100 chance) • Area Susceptible to Groundwater Flooding (>=75% risk)	**Trees**	Some trees to the north – none protected.
Views	None		
Heritage Assets	Adjacent to site: • Conservation Areas - CA52 East Sheen Avenue (50m south), CA35 Queens Road Mortlake (60m northeast) • Buildings of Townscape Merit (BTMs) – 215-309 Upper Richmond Road (50m south)	**Access to Open Space / Nature**	Area Poorly Provided with Public Open Space
Relevant Planning History	• Planning permission granted 21/12/2018 and now implemented for change of use to a gym (formerly Use Class D2) for No. 172-176 (18/0820/FUL)		
Description of Current Site Character	The site comprises of a long, single-storey commercial unit with gym on the western half of the site and a large 3-storey with accommodation in the roof telephone exchange on the eastern side. A small car park for the commercial use is accessed off Upper Richmond Road West to the south and a small servicing yard is located to the north/rear of the telephone exchange, via a narrow access road from Upper Richmond Road West which divides the two buildings. A small non-designated grassed area is located to the north of the site to the rear of the commercial unit.		
Neighbour Context	Upper Richmond Road West is a busy shopping parade with buildings typically 3 storeys with residential in upper floors and shops, restaurants and other commercial at ground floor. On the opposite side of the road to the site the parade is part of East Sheen's designated Primary Shopping Areas and are also BTMs. The remaining surrounding area is predominantly residential mainly comprising 2-storey terraces.		

Vision: Proposed site - Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen

In the event that the Telephone Exchange is declared surplus to requirements by the telecoms landowner, appropriate land uses for the whole site 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.

- **It is acknowledged that the implementation of the 2018 planning permission for change of use to a gym, which is now operational, means that a comprehensive redevelopment of the whole site is unlikely; however, there is still opportunity for the improvement of the area.**
- **The Richmond upon Thames Retail and Leisure Study (Phase 2) forecasts a small requirement for 189 m2 of retail *(comparison and convenience)* floorspace and a requirement for 1,128 sqm of food/beverage floorspace by 2034, amounting to a total requirement *(retail and food/beverage)* of c.1,300 sqm (gross) uses for East Sheen/Barnes to 2034. *An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study which supersedes earlier forecasting. It suggests that for East Sheen/Barnes there will be no requirement for retail (comparison and convenience) floorspace and a requirement for 1,100 sqm of food/beverage floorspace and hence a total requirement (retail and food/beverage) of c 1,100 sqm (gross) to 2034.***

- **As the site is in one of the borough's town centres and given the borough's shortage of supply of employment land and premises, there is an expectation that any proposal provides employment floorspace, particularly offices, which could be in the form of flexible shared workspaces.**
- **Any redevelopment proposal should provide for employment or commercial floorspace as well as community and social infrastructure uses, that will enable the centre to grow and diversify in a way that responds to changes in the retail and leisure industries, providing commercial, business and service uses to serve the local community. 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 policy compliant 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.**
- **Development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance in the Urban Design Study and Village Planning Guidance.**

Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

Statement Site Allocation 38

Barnes Hospital, East Sheen

CONTEXT: Proposed Site – Barnes Hospital, South Worple Way, East Sheen. SW14 8SU			
Ward	Mortlake & Barnes Common	**Site Area**	1.44 ha
Land ownership	Public and private	**CIL Band**	Richmond CIL: Mortlake & Barnes Common – Higher MCIL: Band 1
Existing land uses	Former hospital (Use Class C2); Extant outline planning permission for health centre (Use Class E(e)), Special Educational Needs (SEN) School (Use Class F1(a)) and residential (Use Class C2)		
Local Plan Place-Based Strategy	Mortlake & East Sheen	**Urban Design Study Area**	H2 Mortlake Residential
Village Plan Guidance	Character Area 8 'Grosvenor Avenue / West of Alexandra Road', East Sheen Village Planning Guidance SPD	**Neighbourhood Plan**	
London Plan Designations	Brownfield Land Register	**Type of Centre**	None – out of centre
Transport / Highways	PTAL 2 'poor' Mortlake Station approximate 9 minute walk Controlled Parking Zone B2 – White Hart Lane South	**Air Quality**	Air Quality Management Area

CONTEXT: Proposed Site – Barnes Hospital, South Worple Way, East Sheen. SW14 8SU			
Flood Risk	• Flood Zone 1 • Critical Drainage Area • Surface Water Flooding (1 in 100 chance) • Area Susceptible to Groundwater Flooding (>=75% risk) • Please note that the Environment Agency intends to review its Beverley Brook flood modelling, which could potentially result in a higher flood risk designation on this site; however, at the time of writing no changes have been indicated or confirmed.	**Trees**	Two trees on site protected by TPO (northeastern and southeastern corner); TPO Area Group Wood within site along southern and northwestern boundary
Views	View Protected Indicative Zone – View 7		
Heritage Assets	Buildings of Townscape Merit (BTMs): • Barnes Hospital Buildings 1-8 South Worple Way Adjacent to site: • Conservation Areas - CA35 Queens Road Mortlake (immediately west), CA79 Cowley Road (Immediately north), CA16 Thorne Passage Mortlake (115m northeast), CA53 White Hart Lane Mortlake (130m east) • BTMs – 3-24 North Worple Way (30m north)	**Access to Open Space / Nature**	• Mortlake Cemetery (immediately west) - Other Land of Townscape Importance (OOLTI), Site of Important Nature Conservation (SINC) • Railway Side Allotments (160m northeast) - OOLTI
Relevant Planning History	• Outline planning permission granted 14/09/2020 for mixed-use scheme comprising health centre, SEN school and 80 residential units (18/3642/OUT) - This has not been implemented. • 18/3642/NMA2 - Amendment to conditions in Outline Planning Permission (18/3642/OUT) to remove refence to 'quantums' - Pending consideration. An addition Non Material Amendment was granted (18/3642/NMA1) 20/12/2022 to remove reference to number of residential units. • A live planning application (21/3107/FUL) is currently under consideration which proposes to bring forward the residential element separately with an increase in units up to 106 (with the other two 'sites' being developed separately under application ref. 22/3758/FUL [currently awaiting validation at the time of writing]). • Full planning permission granted at Planning Committee (subject signing of a S106 Legal Agreement) for demolition of existing structures and redevelopment to provide a SEN school and health centre - Resolution to grant planning permission granted 10/05/2023		
Description of Current Site Character	The Barnes Hospital site comprises numerous red brick buildings, ranging between 1-2 storeys, 8 of which are BTMs. The remainder of the site is predominantly hard standing though there is some soft landscaping around the perimeters and a number of protected trees and wood groups. The site was previously occupied by the Southwest London and St George's Mental Health Trust, providing health facilities, but was declared surplus to requirements in 2018. Part of the site was sold in March 2019 to a residential developer, with the remainder retained by the Trust. An outline planning application was granted permission in 2020 for a mixed-use scheme comprising health centre, SEN school and 80 residential units. DfE intend to deliver the school, London River Academy, a 90-place special free school for children and young people with social, emotional and mental health needs (SEMH). The permission has not yet been implemented and the site is vacant.		

CONTEXT: Proposed Site – Barnes Hospital, South Worple Way, East Sheen. SW14 8SU	
Neighbour Context	There are a number of Conservation Areas within close proximity to the site and the cemetery to the west is designated open land. The surrounding area is predominantly residential comprising 2-storey terraces on South Worple Avenue to the east and Grosvenor Avenue to the south. The site is bounded by the railway line to the north which serves Southwestern trains, with further residential houses beyond on North Worple Way, many of which are BTMs.

Vision: Proposed site - Barnes Hospital, East Sheen

Appropriate land uses for the site include social and community infrastructure uses. Any redevelopment proposal will be required to prioritise the provision of a new Special Education Needs (SEN) school.

- **There is a clear need for a new SEN school in this area, as set out in the Council's updated School Place Planning Strategy. The Council therefore expects any redevelopment proposal to prioritise the provision of the educational use.**
- **Appropriate land uses include social and community infrastructure uses (including education). The possibility of locating primary and/or community health services on this site should be investigated.**
- **Only if community and social infrastructure uses have been explored and options discounted in line with other policies in the Plan, would the provision of housing (including affordable housing) and potential for extra-care housing, be considered as a potential redevelopment option.**
- **Policy 49. Social and Community Infrastructure in this Plan proposes that should a scheme come forward for redevelopment or change of use to 100% genuinely affordable housing, in accordance with Policy 11. Affordable Housing in terms of mix, tenure and affordability, then the site would not need to be considered for alternative social infrastructure use or marketing submitted. In those circumstances, a wholly affordable housing scheme would be supported. However, on this site the Council is seeking social infrastructure/community use along with affordable housing, to meet local education and health needs.**
- **The Council expects that the most important existing BTMs are retained. Any proposal should respond positively to the adjoining Queens Road Conservation Area and the relationship with Mortlake cemetery.**
- **There is an expectation that any redevelopment provides new on-site Public Open Space in addition to any external amenity space requirements, delivering multi-functional benefits including for nature conservation and biodiversity value, as well as for health and wellbeing of future occupants and users, including surrounding communities.**
- **Development should have regard to the design objectives and general guidance relating to the local character of the area set out in the relevant character area profiles and design guidance in the Urban Design Study and Village Planning Guidance.**

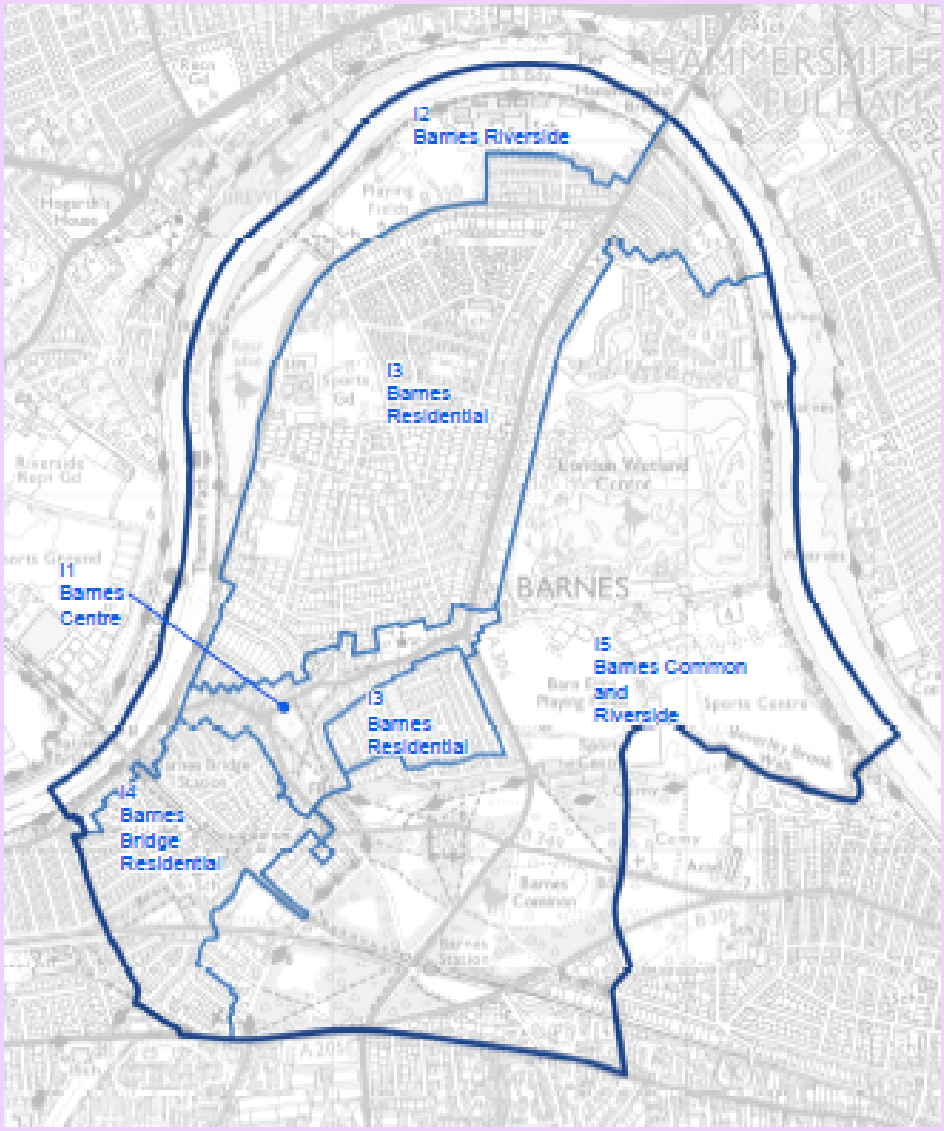
Expected Implementation Timescale		
Short- term (0-5 years)	Medium (5-10 years)	Long (10-15 years)

14 Place-based Strategy for Barnes

Policy PBS9 ***Place-based Strategy for Barnes***

Area Profile

The Barnes area encompasses Barnes Centre and Riverside, the residential areas including Barnes Bridge and Barnes Common. These are character areas I1, I2, I3, I4 and I5 in the Urban Design Study.



The key features of Barnes are the Green; the pond and surrounding buildings and trees which create an outstanding village atmosphere; Castelnau with its fine houses which provide a dramatic approach to Hammersmith Bridge; and the former Harrods depository building (now converted into flats). The Bridge is an important transport link to key destinations for cyclists, pedestrians, vehicles and river traffic, and its closure for repairs in 2020has caused considerable impact.

The River Thames and related towpaths and open spaces are the other defining features of the area. Key open areas include Barnes Common, the Wildlife and Wetlands Trust London Wetland Centre, Leg o' Mutton reservoir and the Barn Elms Playing Fields.

Barnes is identified as a local centre in the borough's centre hierarchy (see section 6 of the Plan). Barnes High Street and Church Road have a good range of local shops and services and there is also an important local shopping area at Castelnau which serves a distinct residential area that has been amongst the most relatively disadvantaged in the borough.

The setting of Barnes is strongly influenced by the River Thames bordering Barnes on three sides, as well as the significant open spaces of Barnes Common and the London Wetland Centre.

As part of the Urban Design Study consultation in 2021 on what people valued in their area, Barnes High Street Local Centre (I1) received the highest score for shops/restaurants, Barnes Riverside (I2) received the highest score for all features, and Barnes Residential (I3) was scored highly with the maximum score given to its green spaces.

Overall strategy

Overall, the Urban Design Study recognises the characterisation of Barnes Centre (I1) has a strong sense of place and is an area of high-quality townscape. The area's character and functionality, however, are negatively impacted by the dominating presence of traffic, especially along the A3003. It recognises the existing character of Barnes Riverside (I2) is strong, with a distinctive sense of identity and an abundance of high-quality open space; the quiet and suburban quality of the area is sensitive to new development. The townscape along The Terrace is a valued feature that forms an important frontage to Barnes. The Barnes Residential Area (I3) has an overarching sense of place from the high quality of the Castelnau and Barnes Green Conservation Areas, the sense of spaciousness, and the prevailing sense of unity across the character area. The existing character of Barnes Bridge Residential (I4) is strong, with a distinctive sense of place and "village" quality. Barnes Common and Riverside (I5) is recognised as very strong due to its extensive network of high-quality open spaces of metropolitan importance and the distinctive townscape elements that border the Common. The Urban Design Study strategy for all of these character areas is conserve, with little change expected overall given the overall high sensitivity to change and enhance the historic functionality around Barnes Centre through better prioritising pedestrian use and accessibility. The Urban Design Study contains design guidance for each character area and for Richmond's Riverside.

Other initiatives

The Council works with the Barnes Town Centre Manager, a role provided as part of the Barnes Community Association, to help attract new, independent shops to Barnes, make local shops more popular with residents, build on the image of Barnes as a tourist destination (as a way of increasing shoppers' footfall) and to work with traders.
The Council is working in partnership with Barnes Common Ltd and the London Wetland Centre WWT on a range of flood projects in the Beverley Brook catchment.

Vision

The vision for Barnes is to maintain and enhance the character of Barnes as an attractive residential area and as a place that people want to live and visit, enhancing community connection to reduce isolation and deprivation.
New development will occur through incremental intensification of small sites, with infill and conversions that are well-designed to respect the character and bring positive benefits to existing communities.

Policy

Future development in this place is expected, where relevant, to:

- **Strengthen the role and function of the area's distinctive Barnes local centre and encourage independent shops, and support the neighbourhood centre of Castelnau to ensure day-to-day facilities are accessible, in accordance with Policy 1 Living Locally.**
- **Enable future pedestrianisation of A3003 in Barnes centre to make the area more permeable and reduce the prominence of traffic. This will present an opportunity to create public realm for dwelling as opposed to the existing, narrow and transient pavements along Barnes High Street.**
- **Consider opportunities to improve connectivity including wayfinding from the station, the High Street to Barnes Green and to the Riverside and Thames Path route.**
- **Improve the public realm to enhance the sense of arrival at Barnes Station, and reanimate streets as a local hub for shops, cafés, and small businesses, including around Priest's Bridge.**
- **Consider opportunities to enhance Barnes Riverside, preserving views along the Thames, opening up for sport and recreational activities and to maintain a sense of activity and vibrancy, with potential for temporary pedestrianisation of The Terrace to create café/restaurant seating or more width to improve pedestrian experience, reduce the perceived dominance of vehicles and better connect the townscape with the Dock Gardens and Thames Path, provided proposals accord with Policy 8 in respect of tidal flood defences and do not encroach on the river.**

Other policy initiatives

The Council will support through partnership working proposals to investigate the feasibility to restore a green walkway along Barnes Bridge with step-free access at Barnes Bridge station. The Council will continue to work with relevant partners to deliver flood projects in the Beverley Brook catchment.

There are no Site Allocations within the Barnes area.

15 Policies

16 Responding to the climate emergency and taking action

Definitions for this section / theme of the Plan

Building Regulations: Part L (conservation and fuel power) of the Building Regulations in England sets the limiting values for all building fabrics, the conservation of fuel and energy. The Government is in the process of consulting on changes to Part L for the Future Homes Standard, anticipated to come into force in 2025. Part F (ventilation) applies to the ventilation requirements and standard required within buildings. Part O (overheating) requires the calculation and minimisation of overheating within commercial and residential buildings. Often known as TM52 and TM59 overheating analysis requires detailed dynamic simulation thermal modelling (DSM).

Building Research Establishment Environmental Assessment Methodology (BREEAM): BREEAM is a sustainability assessment and certification scheme for the built environment and provides a widely recognised and well understood framework for the promotion of sustainable design. It allows for the assessment and rating of the environmental life cycle impacts arising from different types of developments, including energy, pollution, water, materials, health and wellbeing, and waste. Compliance with BREEAM will help to mitigate the life cycle impacts of new and existing buildings on the environment and allow developers to demonstrate to the Council that development is truly sustainable.

Carbon: The word carbon is used in this Plan as shorthand for all greenhouse gases. London's carbon accounting is measured in carbon dioxide equivalent, which includes the conversion of other greenhouse gases into their equivalent carbon dioxide emissions.

Carbon Neutral: The definition of a carbon neutral building is a building where greenhouse gas emissions are minimised at all stages, including the manufacturing processes, during construction and during use of the building. The emissions that occur are balanced by climate-positive initiatives and offsetting so that the net carbon footprint over time is zero, making or resulting in no net release of carbon dioxide into the atmosphere.

Decentralised energy: Decentralised energy includes low- and zero-carbon power and/or heat generated and delivered within London. This includes microgeneration, such as photovoltaics on individual buildings, through to large-scale heat networks.

Low-carbon energy: Low carbon means less carbon dioxide. It is essentially energy that is produced with substantially lower greenhouse gas emissions than conventional fossil fuel power generation. There are four main types of low-carbon energy: wind, solar, hydro and nuclear power.

Renewable energy: This refers to energy collected from renewable resources that are naturally and constantly replenished. It includes sources like sunlight, wind, rain, tides, waves, and geothermal heat. Although most renewable energy is sustainable energy, some is not, for example some biomass is unsustainable.

Zero-carbon (Net-zero carbon): Activity that causes no net release of carbon dioxide and other greenhouse gas emissions into the atmosphere. Zero-carbon therefore refers to both embodied energy and operational energy. Embodied energy refers to the energy which is used in the manufacture of the building materials, while operational energy is that which is used to heat, cool and power your home. The embodied energy of insulation, for example, is the energy which is used to create the insulation itself, while good insulation will help towards lowering a home's operational energy. A building which operates at zero carbon does not burn fossil fuels, has ultra-high energy efficiency and is 100% powered by renewable energy.

Zero-emission: Activity that causes no release of air pollutants and carbon dioxide or other greenhouse gases.

Policy 3

Tackling the Climate Emergency (Strategic Policy)

A. Climate change is now the greatest challenge facing our society. The Council will promote zero carbon development, with the aim that all buildings and infrastructure projects in the borough will be net-zero carbon by 2043, at the latest. This will require substantial reductions in greenhouse gas emissions and will also reduce fuel poverty and improve long term energy security for Richmond's residents and businesses. Development must not exacerbate climate change or its effects. Development should increase local resilience to current and future impacts of climate changes, especially for the most vulnerable people and property.

B. This will be achieved by requiring all development to:

1. reduce greenhouse gas emissions in accordance with the London Plan's Energy Hierarchy and support the transition to a low carbon society by maximising energy efficiency, zero and low carbon heat and local renewable energy generation;
2. follow the principles of the circular economy and support effective resources use to ensure that they are kept in use for as long as possible and thereby minimise waste;
3. reuse and refurbishment in preference to demolition and new construction;
4. demonstrate that they are well designed, fully adaptable and resilient to the impacts of a changing climate;
5. adapt to the changing climate by minimising the effects of overheating, mitigating the urban heat island effect, managing flooding, and minimising energy consumption in accordance with the London Plan's Cooling Hierarchy;
6. enhance and improve the borough's green and blue infrastructure to ensure it delivers multi-functional benefits, such as enhancing micro-climates and natural carbon sinks as well as improving air quality;
7. adopt an integrated approach to water management which considers flood risk and flood storage, sustainable drainage, water efficiency, water quality and biodiversity;
8. reduce water demand and meet best practice water efficiency targets;
9. adopt a circular economy approach and minimise embodied carbon;
10. ensure that the principles of active and sustainable modes of travel are adopted;
11. promote retrofitting of existing buildings, through low-carbon measures;
12. promote healthy, sustainable and low carbon lifestyles in line with the Council's Climate Emergency Strategy.

C. To ensure that Richmond is on the right trajectory to achieve its net-zero carbon target, responding to climate change, including sustainable design and construction, must be considered holistically from the start of the design process. Therefore, all development proposals are required to demonstrate how they will comply with all relevant policies on climate change and sustainable design during design, construction and operation of the development.

D. The Council will work with partners and local communities to improve the energy *and water* efficiency of the existing building stock and wider public realm, with a particular focus on increasing energy efficiency of homes and businesses, especially improved insulation in lofts, walls and floors. The Council's Carbon Offset Fund will be used to implement projects to reduce carbon emissions across the borough.

16.1 Richmond Council is taking robust action to tackle the local and global threat of climate change, both externally, in partnership with local organisations and residents, and internally, minimising the Council's environmental impact by cutting carbon, waste and pollution. This was emphasised when Richmond Council declared a Climate Change Emergency in July 2019. The Council has prepared a Net Zero Carbon Study to support several policies in this Plan which set out ambitious targets for Richmond. Multiple typologies of residential and nonresidential developments, specific to Richmond, were prepared and assessed to understand what net zero carbon standards could be achieved and justifies the policies in the Plan are feasible and deliverable.

16.2 Planning has a significant role to play in minimising the borough's contribution to climate change and ensuring that the impacts of climate change can be effectively mitigated. Climate change impacts are increasingly affecting the day-to-day lives of people who live in, work in and visit Richmond borough. The urban heat island effect, flooding events, and extreme weather will threaten both our health and wellbeing and the physical fabric of the borough.

16.3 The Council's Climate Emergency Strategy sets out five priority areas (air, waste, water, nature and energy efficiency). The strategy outlines how the Council will reduce emissions and the organisation's carbon footprint, including a commitment for the Council to become carbon neutral by the year 2030 and zero carbon by the year 2050. This has since been updated by a commitment, with partners across London, to reach net zero carbon by 2043. The strategy also highlights that we will need to provide community leadership so that residents and businesses are able to get involved in preventing and preparing for climate change. Developers, local businesses and residents bringing forward all types and all sizes of development schemes within the borough as part of planning applications, all have a fundamental role to play in helping to meet this target. Therefore, all new development proposals coming forward within the borough should be zero carbon.

16.4 To achieve this ambitious target, we will need to decarbonise activities across all sectors. This will require a transition to a low carbon and circular economy which promotes the effective use of resources and minimises waste, ensure all journeys are no longer made by petrol and diesel vehicles but instead by zero carbon alternatives such as cycling and walking as well as zero carbon public transport. In addition, emissions from all existing and new buildings will need to be net-zero carbon by minimising energy demand and meeting all our energy needs using renewable and low carbon energy

16.5 To support the transition to a low carbon future in a changing climate, the Council will shape places in ways that contribute to radical reductions in greenhouse gas emissions; minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the reuse and conversion of existing buildings; support renewable and low carbon energy and associated infrastructure; and take full account of flood risks.

16.6 Extensive retrofit will be required to decarbonise Richmond's existing building stock given that low carbon heat solutions require high levels of energy efficiency. The costs of achieving higher standards via retrofit are three to five times higher than for new buildings and the carbon impact of delayed action is significant.

16.7 Policy 2 Spatial Strategy: Managing change in the borough sets out a presumption in favour of refurbishment. Whilst there will be circumstances where demolition may be more appropriate, in general, because of the substantial embodied energy savings made in repurposing existing buildings, compared with the ultra-high embodied energy costs of demolition and rebuild, the reuse and/or refurbishment of existing buildings is preferred. Using the existing capacity of buildings is economically, environmentally and socially responsible. The reuse or retrofit of existing buildings is also generally more cost-effective and less controversial because it conserves and enhances existing places and neighbourhoods.

16.8 Extrapolating the current annual London Plan housing target of 411 per annum for Richmond would mean that around 12,000 new dwellings could be built in Richmond between 2021 and 2050. The Local Plan and its policies must therefore ensure that new development in the borough does not create a legacy of poor performance that will require remedial action in the future and add to Richmond's retrofit burden. There is evidence that all new buildings will need to operate at net-zero carbon by 2030 in order to achieve a zero carbon built environment in the UK by 2050. This means that all new buildings must be designed to operate at net-zero carbon by 2025.

16.9 The climate change policies in this section should be read alongside the relevant policies in the London Plan as well as other sections in this Plan, including the green and blue infrastructure, and the design policies.

Policy 4

Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)

A. To achieve the borough's target of net-zero carbon by 2043 at the latest, all proposed development will be required to demonstrate that the fullest contribution to minimising greenhouse gas emissions has been made on site.

This will be achieved by requiring:

B. All development:

1. to reduce greenhouse gas emissions on-site in accordance with the London Plan's Energy Hierarchy:
    a. Be lean: use less energy and manage demand during operation.
    b. Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.
    c. Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
    d. Be seen: monitor, verify and report on energy performance
2. to make the fullest contribution to supplying energy efficiently and cleanly, and to maximise renewable and low carbon energy generation, storage and use, through the deployment of appropriately selected, sized and sited technologies;
3. to promote a more ambitious use of available roof space to deliver multi-functional benefits (such as the co-location of renewable energy and green infrastructure);
4. to adopt a circular economy approach to building design and construction to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon (see Policy 7 'Waste and the Circular Economy (Strategic Policy)').

C. **All conversions and changes of use that result in the creation of 1 or more dwellings:**

1. to provide an Energy Strategy demonstrating how emissions savings have been maximised on site at each stage of the energy hierarchy;
2. to achieve net-zero carbon with a minimum of 35% on-site reduction beyond Building Regulations (2021) (or any future updating successor to these standards).

D. **New-build residential development of 1 or more dwellings, and major residential development of 10 or more dwellings (including changes of use, conversions and major refurbishments),**

and non-residential development of 100sqm or more (including changes of use, conversions and refurbishments):

1. to achieve net-zero carbon with a minimum of 60% on-site reduction;
2. to provide an Energy Strategy demonstrating how emissions savings have been maximised on site at each stage of the London Plan's Energy Hierarchy;
3. to use low carbon heat and hot water supply; there can be no gas boilers in new dwellings or new non-domestic development in Richmond from 2024;
4. to demonstrate how energy demand, including regulated and unregulated uses (including plant or equipment), has been minimised on site through passive measures and by maximising the efficiency of building form, fabric and systems;
5. to reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the London Plan's Cooling Hierarchy (Policy SI 4 Managing Heat Risk) and meet the requirements of Part O of the Building Regulations (TM5~~9~~2 (domestic) and TM5~~2~~9 (nondomestic));
6. to meet the requirements of Part F of the Building Regulations (Ventilation);
7. to assess viability of on-site renewables and target solar technologies equal to 40% of building footprint area (unless it can be clearly demonstrated that this is not practical);
8. to disclose the anticipated Energy Use Intensity and space heating demand at design and pre-occupation stage, and over at least the first five operational years.

E. **Zero carbon and the Council's Carbon Offset Fund**

1. New development proposals will be required to get as close as possible to zero-carbon on-site, rather than relying on offset fund payments to make up any shortfall in emissions. A cash-in-lieu contribution to meet net-zero carbon will only be considered acceptable in instances where it has been clearly demonstrated with robust and credible evidence that no further savings can be achieved on-site, due to site constraints or limitations. Off-site provision instead of a cash-in-lieu contribution is only acceptable if an alternative proposal is identified, delivery of that proposal is certain and subject to agreement by the Council.
2. The London Plan's carbon offset price is currently set at £95/t. This is generally considered too low to actually deliver equivalent carbon savings and therefore does not incentivise sufficient on-site savings. Therefore, it is a perverse incentive for developers to offset carbon emissions via a cash-in-lieu contribution rather than achieving the actual savings on site.

In order to incentivise developers to implement on-site lower carbon strategies where possible, and to ensure that any remaining carbon shortfall can adequately be addressed off site, the carbon shortfall for the assumed life of a development (e.g. 30 years) will therefore be offset at a rate of **£300/t** as at 2021. The price for offsetting carbon is regularly reviewed. Any changes to Richmond's suggested carbon offset price will be updated in future guidance.

Table 16.1 Summary of net zero carbon and on-site carbon emission reduction requirements:

Development Type	Minimum on-site total reduction in CO2
Major residential development of 10 or more dwellings (including new build, change of use, conversions, and major refurbishments).	**Net-zero** with minimum **60%** on-site reduction; with a maximum of 40% to be offset at a rate of £300/t
Minor new-build residential development of 1 or more dwellings.	**Net-zero** with minimum **60%** on-site reduction; with a maximum of 40% to be offset at a rate of £300/t

Development Type	Minimum on-site total reduction in CO2
Minor residential change of use and conversions resulting in the creation of 1 or more dwellings.	**Net-zero** with minimum **35%** on-site reduction; with a maximum of 60% to be offset at a rate of £300/t
Non-residential development of 100sqm Gross Internal Area (GIA) or more (including new build, change of use and refurbishments).	**Net-zero** with minimum **60%** on-site reduction; with a maximum of 40% to be offset at a rate of £300/t

16.10 The purpose of this policy is to ensure all development in this borough minimises Richmond's contribution to climate change. Therefore, all development proposals should apply the Energy Hierarchy, as set out in the London Plan. The priority is to minimise energy demand, and then address how energy will be supplied and renewable technologies incorporated. An important aspect of managing demand will be to reduce peak energy loadings.

16.11 All development (residential and non-residential) should be net-zero, which means that a certain percentage of regulation carbon emissions has to be achieved on-site (see Table 16.1 above), with the remaining emissions (up to 100%) to be offset through a contribution to the Council's Carbon Offset Fund. The targets are expressed as minimum improvement over the Target Emission Rate (TER) outlined in the national Building Regulations (2021).

16.12 While the London Plan only requires 'major' developments to be zero carbon, the majority of developments in Richmond borough are minor schemes for which the London Plan policy would not apply. In order to achieve our carbon reduction target as cost effectively as possible, all new development must therefore be fit for the future (i.e. be ultra-energy efficient and climate resilient, and maximise low carbon and renewable energy). The cumulative impact of all minor developments represents a large source of carbon emissions, and they will play a significant role in becoming a net-zero carbon borough by 2043 at the latest. Development that takes place now will become part of the existing built stock, and if the borough is not moving towards a net-zero requirement for all developments as part of this Local Plan, it would be inevitable for these developments to be retrofitted at a significant cost in the future. Therefore, all development will need to reduce its greenhouse gas emissions to near zero on site and become net-zero carbon or net-positive buildings. In addition, given that a significant proportion of non-residential schemes in Richmond are less than 1,000sqm GIA, the threshold of 100sqm has been applied to non-residential schemes to ensure that minor developments also achieve the required emission reductions

16.13 The Council will require an Energy Strategy, setting out an assessment of energy demand and carbon emissions from a proposed development, which should demonstrate the expected energy and emissions savings from energy efficiency and renewable energy measures incorporated into the development. Renewable technologies such as photovoltaic (PV) cells, solar thermal panels, ground and air source heat pumps and other forms of renewable energy are likely to be appropriate in many parts of the borough, subject to other policies within this Plan. There could also be opportunities for other and/or more advanced renewable technologies, such as tidal microgeneration on the River Thames. It should be noted that ground or air source heat pumps are powered by electricity, so unless this comes from a renewable source, they still generate carbon emissions, though less than those associated with conventional types of heating, and with no on-site emissions. Ideally solar PV should be used for the heat pumps to be considered renewable energy.

16.14 To ensure that development proposals comply with the policies set out in this Plan, the approach to energy supply on development sites should be clearly set out in an Energy Strategy, which shows how various options have been considered and includes the provision of sufficient and robust detail to demonstrate an achievable strategy. It must demonstrate how the energy requirements will be met in line with the London Plan's Energy Hierarchy. The onus will be on developers to pay for the cost of any independent assessment on behalf of the Council.

16.15 The Council recognises that there may be exceptional circumstances where it is not technically feasible for a development to achieve the required on-site carbon emissions reductions. In such cases, the applicant will have to demonstrate in the Energy Strategy the reasons why the target cannot be met on-site. As part of this exercise, applicants should thoroughly explore all measures and potential options because many renewable energy technologies can still be delivered within constrained development sites where there is very limited outdoor space; for example, roof mounted solar technologies and air source heat pumps; air source heat pumps can be delivered within sites where there is only very limited outdoor space. The renewable energy sector is a rapidly growing sector with continuous scientific technological advancements, meaning that the technology is gradually becoming cheaper, more advanced, more efficient, more space saving, and renewable energy solutions can now be delivered within a range of different development types and sites. Any justifiable shortfall in on-site reductions will need to be met through a cash-in-lieu contribution to the Council's Carbon Offset Fund, agreed through a Section 106 legal agreement in line with the Planning Obligations SPD.

16.16 Developments in conservation areas, or those which could affect other heritage assets including their settings, need to provide careful consideration of how sustainable energy measures may be incorporated without adversely impacting on the character, function and preservation of a specific area or asset, in accordance with other policies set out in this Local Plan. There is no one-size-fits-all approach or solution to accommodating sustainable energy measures in the historic environment; however, applicants should not presume that a viable and sustainable solution cannot be found or be provided, especially as technologies are constantly improving (including their visual impact). Ultimately, the merits of a proposal and any potential harm to a heritage asset will need to be considered and assessed on a case-by case basis, as it will depend on site specific circumstances, such as the details of any proposed sustainable energy measure and the significance of the heritage asset. The Council is considering producing further guidance on energy efficiency in historic buildings.

16.17 Future changes to energy efficiency standards will be kept under review and policy requirements will be updated with the prevailing standards if required. The Government's 2019 Spring Statement includes a commitment to introducing a Future Homes Standard in 2025. This will require new build homes to be future proofed with low carbon heating and much higher levels of energy efficiency. As an achievable steppingstone to the Future Homes Standard, the Government has increased the energy efficiency requirements in Part L of the Building Regulations for new homes. Development proposals will be expected to meet these new standards which are set out in the most current version of the Building Regulations (2021), including transitional arrangements. Whilst Building Regulations have been updated recently and are expected to be updated again in 2025, current proposals for the Future Homes Standard 2025 are not ambitious enough to deliver the savings required to achieve our carbon reduction targets. Therefore, London Plan and in particular Local Plan policy standards will apply until they are superseded by higher national standards

16.18 In line with the current Building Regulations, overheating and ventilation have become important considerations for the Council and accordingly ambitious requirements have been set. Both new build and change of use developments are going to have to consider

these factors in order to ensure that residential properties are sustainable and to avoid the potential excess energy loss from overheating. Additionally, the Council intends for applicants to place greater emphasis on the aspect of buildings to improve the ventilation of them. It will be important that ventilation is considered at the design stage for new build and major change of use development as this is the most cost-effective method to ensure both healthy residential and non-residential developments are brought forward in the borough.

16.19 Where permission is granted, conditions may be included as part of this to ensure the provision of evidence that the approved Energy Strategy is implemented on site. Design stage and post-construction reviews will generally be required by conditions.

16.20 In order to become zero carbon in line with the Council's ambitions, it is essential that the development continues to deliver the energy demand and carbon emission commitments once operational. The GLA's 'Be Seen' Energy monitoring guidance should be used to help developers ensure that London Plan SI 2 has been complied with post construction. Building logbooks that meet the requirements of CIBSE TM31 will be requested of all applicants to ensure a standardised format is used across all developments to demonstrate compliance with Part L and the London Plan as well as demonstrate their Energy Use Intensity and space heating demand. Therefore, the Council may require the developer, through a s106 agreement, to cover the cost of the ongoing (over a period of at least five years) monitoring of the building's energy efficiency through the use of smart meters and a web-based platform. This will require payments to cover the cost of the equipment, as well as officer time to review the outputs. Monitoring will also provide the Council with a robust evidence base against which to set future revised targets as part of a longer-term 'stepped approach' to the realisation of true zero carbon or net-positive buildings.

Policy 5

Energy Infrastructure (Strategic Policy)

A. All development proposals should prepare an Energy Strategy in accordance with the Mayor's Energy Planning Guidance. All developments should maximise opportunities for on-site electricity and heat production from renewable energy sources. This approach will help reduce carbon emissions, reduce energy costs to occupants, reduce fuel poverty and improve the borough's energy resilience.

B. New development will be expected to connect to any existing decentralised energy network (DEN). Where networks do not exist, developments should make provision to connect to any future network that may be developed, having regard to the possibility for this to come forward.

C. Major residential development of 10 or more dwellings (including changes of use, conversions and major refurbishments), and non-residential development of 500sqm (including changes of use, conversions and refurbishments) or more will need:

1. to connect to, and where appropriate extend, existing DENs in the vicinity of the site, unless a robust and credible feasibility assessment demonstrates that connection is not reasonably possible;
2. where a connection is not feasible, provide an assessment of the provision of on-site DEN; there is an expectation that on-site – even if in the form of microgeneration such as solar technologies – are feasible; provision should also be made for future connection to a wider DEN network should one become available;
3. where a connection or provision of new DEN is not immediately available, ensure the development is designed in accordance with the Heating Hierarchy set out in London Plan Policies SI 3 (D) and S1 4 (B).

D. Any new DENs should prioritise non-combustible, non-fossil fuel energy as the primary heat source. Given that the carbon savings from gas engine combined heat and power (CHP) systems are declining due to the decarbonisation of the national electricity grid, and increasing evidence of adverse air quality impacts, developers will be required to use low and zero carbon heat sources and existing heat networks will need to be decarbonised. This is to ensure there is no increase in the amount of NOx emitted in the borough (see Policy 53 'Local Environmental Impacts', Part D Air Quality).

16.21 The use of decentralised energy and local secondary heat sources is expected to play a significant part in reducing emissions from buildings. All major residential development of 10 or more dwellings (including changes of use, conversions and major refurbishments) and non-residential development of 500sqm or more (including changes of use, conversions and refurbishments) will be expected to comply with London Plan policies on decentralised energy networks and decentralised energy.

16.22 The Council will require all proposed major residential development of 10 or more dwellings (including changes of use, conversions and major refurbishments), and non-residential development of 500sqm or more (including changes of use, conversions and refurbishments) within any identified heat network priority areas to fully explore and utilise decentralised energy, subject to technical and financial viability. The Heat Network Priority Areas and clusters with opportunities for DEN are set out in London Plan Policy SI 3 Energy infrastructure and in the boroughwide Heat Mapping Study respectively.

16.23 Any proposals to develop or connect to a site-wide or district heat network will need to demonstrate compliance with all of Richmond's climate change policies, be future-proofed and demonstrate that heat losses have been minimised. New development will be expected to demonstrate through its Energy Strategy that the most sustainable heating and cooling systems have been selected. This should include consideration of the proposed system as a whole, including the impact of its component materials on greenhouse gas emissions.

16.24 Minor new-build developments should be designed to be able to connect to a local DEN wherever reasonably possible. Where networks do not currently exist, developments should make provision to connect to any planned future decentralised energy network in the vicinity of the site, having regard to opportunities identified in the Heat Network Priority Areas of the London Heat Map and in the boroughwide Heat Mapping Study. Major residential development of 10 or more dwellings (including changes of use, conversions and major refurbishments), and non-residential development of 500sqm or more (including changes of use, conversions and refurbishments) that cannot immediately connect to an existing heating network should follow the Heating and Cooling Hierarchies set out in London Plan policies SI 3 (D) and S1 4 (B).

Policy 6

Sustainable Construction Standards

A. Developments will be required to achieve the highest standards of sustainable design and construction. Applicants will be required to complete the following:

Residential development

1. Development of 1 dwelling unit or more will be required to complete the Sustainable Construction Checklist SPD. A completed Checklist must be submitted as part of the planning application.

2. All new-build residential developments must achieve a four-star rating (as a minimum) under the BRE Home Quality Mark scheme.
3. Proposals for conversions or change of use to residential will be required to meet BREEAM Domestic Refurbishment 'Outstanding' standard or equivalent. If a developer can provide evidence from an accredited BREEAM assessor that achieving 'Outstanding' is not technically feasible than 'Excellent' would be acceptable.
4. Development that results in a new residential dwelling, including conversions, change of use, and extensions that result in a new dwelling unit, *must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.* ~~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).~~

Non-residential development

5. Development of 100sqm or more of non-residential floor space (including changes of use, conversions, and extensions) will be required to complete the Sustainable Construction Checklist SPD. A completed Checklist has to be submitted as part of the planning application.
6. New non-residential buildings over 500sqm will be required to meet BREEAM Nondomestic New Construction 'Outstanding' standard or equivalent. A 'verification stage' certification at post occupancy stage must also be achieved, unless it can be demonstrated that this is not feasible. If a developer can provide evidence from an accredited BREEAM assessor that achieving 'Outstanding' is not technically feasible than 'Excellent' would be acceptable.
7. All major non-residential refurbishment of existing buildings and conversions over 500sqm will be required to achieve a final (post-construction) certified rating of 'Outstanding' under BREEAM Non-domestic Refurbishment and Fit-out 'Outstanding' standard or equivalent. The scope of works of the development must include a full fit-out, unless it can be demonstrated that this is not feasible.

Fabric efficiency standards

B. New-build residential development of 1 or more dwellings, and major residential development of 10 or more dwellings (including changes of use, conversions and major refurbishments), and non-residential development of 100sqm or more (including changes of use, conversions and refurbishments) should demonstrate compliance with the following relevant fabric efficiency targets:

Table 16.2 Fabric Efficiency Targets

Type of Development	Zero Carbon Hub Interim FEES until 31 December 2022	Zero Carbon Hub Full FEES from 01 January 2023 to 31 December 2024	Space Heating Demand Target from 01 January 2025
Block of flats and mid-terraced houses	<43 kWh/m2/yr	<39 kWh/m2/yr	<15 kWh/m2/yr
Semi-detached, end of terrace and detached houses	<52 kWh/m2/yr	<46 kWh/m2/yr	<20 kWh/m2/yr

Type of Development	Zero Carbon Hub Interim FEES until 31 December 2022	Zero Carbon Hub Full FEES from 01 January 2023 to 31 December 2024	Space Heating Demand Target from 01 January 2025
Non-residential development	-	-	<15 kWh/m2/yr

16.25 The principles of sustainable design and construction are designed to be holistic and are more wide-ranging than energy performance alone. National sustainable design and construction standards, such as BREEAM, ensure that a development's full impact on the environment, including water use, transport, land use, ecology, as well as energy use and waste are considered and addressed. Using these standards, or any subsequently adopted set of national sustainable construction standards, will assist in the delivery of a number of the policies covered in the Local Plan including in relation to green infrastructure and sustainable transport.

16.26 BREEAM Domestic Refurbishment applies to alterations to existing dwellings, including domestic conversions, change of use projects and extensions; it allows both the extension and the existing dwelling to be included as part of the assessment as necessary. A post-refurbishment stage assessment or review is required in order to confirm the final 'as refurbished' performance of the building; this must be certified after practical completion of the refurbishment works. If a scheme cannot be assessed under BREEAM Domestic Refurbishment (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.

16.27 Achieving a rating under the BRE Home Quality Mark is one way of demonstrating the standard of a new residential dwelling. The Home Quality Mark has been designed to ensure the construction of high quality sustainable homes that will meet the long-term needs of occupants, including measures for carbon emissions, sustainable materials, air quality and natural daylight. This scheme allows the sustainability credentials of new homes to be compared more easily, and, where adhered to alongside Fabric Energy Efficiency Standard (FEES) requirements, will help developers to demonstrate compliance with the relevant policies.

16.28 The BREEAM New Construction Standards 2022 scheme (covered by Part C of this policy) can be used to assess the environmental life cycle impacts of new non-residential buildings at the design and construction stages. 'New construction' is defined as development that results in a new standalone structure, or a new-build extension to an existing structure. A threshold of 500sqm has been applied to ensure that larger minor developments achieve this requirement.

16.29 A fully fitted assessment will ensure that the fit-out of the development meets the sustainable design policy requirements, including those relating to energy efficiency, water efficiency, and sustainable materials. Fully fitted developments assessed under BREEAM New Construction 2022 must achieve a 'verification stage' certification at post occupancy stage, unless it can be demonstrated that this is not feasible. The New Build Verification Stage incentivises project teams to close the gap between the design intent and actual inuse performance of buildings.

16.30 The BREEAM Non-Domestic Refurbishment and Fit-out scheme assesses the environmental life cycle impacts of existing non-domestic buildings at the refurbishment and fit-out stages. The scope of works being assessed must include a full fit-out unless it can be demonstrated to the Council's satisfaction that the end occupier of the

development has particular requirements which necessitate a shell only or shell and core building. The subsequent fitout of the building must upgrade the project to a BREEAM New Construction fully fitted rating and certification; this will be secured via legal agreement or planning condition, as appropriate. It is important to note that the requirement for the final BREEAM rating needs to also be applied to the shell and core or core only developer and not just the final developer as once the final fit out has taken place many of the necessary credits to achieve the required BREEAM rating are no longer available.

16.31 For any BREEAM scheme, if the 'Outstanding' rating is deemed not to be feasible, details must be provided to justify this. Should the relevant BREEAM scheme be replaced or amended during the lifetime of the plan the equivalent replacement requirements will be applied by the Council.

A Fabric First approach

16.32 The need to ensure that a building's energy demand is reduced before seeking to use low carbon energy is widely accepted as one of the key principles of good environmental design. Despite this, there is still considerable progress which can be made to deliver buildings with a truly energy efficient building fabric. This is due to design and compliance methodology issues, as well as construction quality. Material choices are one of the most important considerations for seeking to achieve sustainable homes. The aim is to take a fabric first approach. Essentially, fabric first is about maximising the performance of the building's structure. This will optimise a home's energy efficiency and reduce its dependence on mechanical heating and ventilation systems. It is important therefore, to try to source products with strong sustainable credentials, including those made from recycled or reclaimed materials, and consider those which can help deliver the best thermal performance.

16.33 The Fabric Energy Efficiency Standard (FEES) will be applied to new-build residential developments in order to reduce carbon emissions through fabric energy efficiency.

16.34 The FEES have the potential to assist scheme viability because designers will be able to achieve greater energy efficiency by improving building form, in addition to specification, which is likely to be cost neutral or potentially cost positive. Compliance with the FEES levels recommended by the Zero Carbon Hub not only supports carbon reduction, but also long-term energy security and the reduction of fuel poverty for future residents.

16.35 The FEES does not apply to residential developments involving refurbishment and extension; however, these developments are encouraged to maximise energy efficiency through a focus on building form (e.g. for a proposed new extension) in addition to specification, in accordance with the FEES.

16.36 In addition to compliance with the FEES, all developments are encouraged to adopt recognised and successful fabric first approaches such as Passivhaus and AECB Building Standard (previously known as Silver Standard), which go beyond the policy levels, in order to promote best practice fabric energy efficiency.

16.37 It is evident that greener homes are much cheaper for tenants; lower running costs of homes built to today's environmental standards have the potential to cut bills for occupiers. A family moving from an old, poorly insulated and fossil-fuel heated home into a modern home could save up to £500 per year.

Water efficiency

16.38 According to Waterwise, the UK has less available water per person than most other European countries. London is drier than Istanbul, and the south-east of England has less water available per person than the Sudan and Syria. London has lower rainfall than the national average while having an extremely high population density.

16.39 This combination of limited water resources and high demand has resulted in the Environment Agency designating the Thames Water region to be '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 are 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. New developments, in their design, landscaping, construction and operation, should incorporate measures to avoid water wastage.

16.40 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 2021. All new residential developments including conversions, reversions, change of use and extensions that create one or more new dwellings must meet this target. Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.

16.41 All minor non-residential new build developments and minor non-residential extensions of between 100sqm and 500sqm are required to demonstrate how all credits for Water consumption (Wat 01) would be achieved under the relevant BREEAM scheme. A minimum of 3 credits must be achieved where rainwater and/or greywater recycling is demonstrated not to be feasible, in order to achieve water credits equivalent to an 'Outstanding' standard.

16.42 Where a BREEAM assessment is not technically feasible, this will have to be confirmed in writing by an accredited BREEAM assessor; applicants should incorporate best practice water saving and recycling measures as outlined in the Sustainable Construction Checklist SPD.

16.43 A number of water saving measures and equipment may be incorporated into developments to comply with the maximum water consumption levels set out in this policy:

- 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. 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 should be used as they can significantly reduce demand for water.

Table 16.3 Summary of climate change development requirements

Development Type	Proposed Local Plan Standards
Major residential development of 10 or more dwellings (including new build, change of use, conversions, and major refurbishments).	Submit Sustainable Construction Checklist Net-zero with minimum 60% on-site reduction; with a maximum of 40% to be offset at a rate of £300/t Meet London Plan Energy Hierarchy Provide Energy Strategy in line with GLA Energy Assessment Guidance 2022 No gas boilers after 2024

Development Type	Proposed Local Plan Standards
	Meet Part O, overheating mitigation requirements, and F, ventilation requirements, of Building Regulations. Target of on-site renewable of 40% of building footprint Disclose the anticipated Energy Use Intensity Connect to existing Decentralised Energy Network (DEN) or one in the vicinity of the site. Provide assessment of on-site DEN including microgeneration such as solar technologies Achieve four star rating under BRE Home Quality Mark BREEAM Domestic Refurbishment 'Outstanding' (Domestic refurb only) Part G of National water standards - 110 l/p/d Meet fabric efficiency targets as set out in Table 16.2 of the Local Plan
Minor new-build residential development of 1 or more dwellings.	Submit Sustainable Construction Checklist Net-zero with minimum 60% on-site reduction; with a maximum of 40% to be offset at a rate of £300/t Meet London Plan Energy Hierarchy Provide Energy Strategy in line with GLA Energy Assessment Guidance 2022 No gas boilers after 2024 Meet Part O, overheating mitigation requirements, and F, ventilation requirements, of Building Regulations. Target of on-site renewable of 40% of building footprint Disclose the anticipated Energy Use Intensity Connect to existing Decentralised Energy Network (DEN). Achieve four star rating under BRE Home Quality Mark Part G of National water standards - 110 l/p/d Meet fabric efficiency targets as set out in Table 16.2 of the Local Plan
Minor residential change of use and conversions resulting in the creation of 1 or more dwellings.	Submit Sustainable Construction Checklist Net-zero with minimum 35% on-site reduction; with a maximum of 65% to be offset at a rate of £300/t Meet London Plan Energy Hierarchy

Development Type	Proposed Local Plan Standards
	Provide Energy Strategy in line with GLA Energy Assessment Guidance 2022 Connect to existing Decentralised Energy Network (DEN). BREEAM Domestic Refurbishment 'Outstanding' (Domestic refurb only) Part G of National water standards - 110 l/p/d Meet fabric efficiency targets as set out in Table 16.2 of the Local Plan
Non-residential development of 100sqm Gross Internal Area (GIA) or more (including new build, change of use and refurbishments).	Submit Sustainable Construction Checklist Net-zero with minimum 60% on-site reduction; with a maximum of 40% to be offset at a rate of £300/t Meet London Plan Energy Hierarchy Provide Energy Strategy in line with GLA Energy Assessment Guidance 2022 No gas boilers after 2024 Meet Part O, overheating mitigation requirements, and F, ventilation requirements, of Building Regulations. Target of on-site renewable of 40% of building footprint Disclose the anticipated Energy Use Intensity Meet fabric efficiency targets as set out in Table 16.2 of the Local Plan *Proposals above 500sqm (GIA) must also:* Connect to existing Decentralised Energy Network (DEN) or one in the vicinity of the site. Provide assessment of on-site DEN including microgeneration such as solar technologies BREEAM Non-domestic New Construction 'Outstanding', where applicable BREEAM Non-domestic Refurbishment and Fit-out 'Outstanding', where applicable

Policy 7

Waste and the Circular Economy (Strategic Policy)

Waste

A. The Council will ensure waste is managed in accordance with the principles of the Circular economy.

1. All developments, including conversions and changes of use are required to provide adequate refuse and recycling storage space and facilities for the separate collection of dry recyclables (card, paper, mixed plastics, metals, glass) and food, which allows for ease of collection and which residents and occupiers can easily access, in line with the guidance and advice set out in 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. Where appropriate development proposals should make use of the rail and the waterway network for the transportation of construction, demolition and other waste. Development proposals in close proximity to the river should utilise the river for the transport of construction materials and waste where practicable. Transporting goods by water can mean lower carbon emissions whilst also removing vehicles from the roads, subject to vessels using ideally zero carbon or low carbon technologies.
4. All major developments and engineering works, 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. A Construction Environment Management Plan (CEMP) is required for all development using the river to transport construction materials and waste.

B. The borough's waste sites are safeguarded. 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 and the London Plan.

Circular economy

C. A circular economy is an alternative to a traditional linear economy (make, use, dispose) in which we keep resources in use for as long as possible, extract the maximum value from them while in use, then recover and regenerate products and materials at the end of each service life.

1. All development proposals are required to adopt a circular economy approach to building design and construction to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon. All development should:

a. Prioritise the reuse and retrofit of existing buildings wherever possible before considering the design of new buildings.

b. Be designed for durability and flexibility as well as easy disassembly and reuse to minimise waste during the 'in-use' and 'end of life' phases of the development. Building shape and form should be designed to minimise embodied carbon and limit the need for repair and replacement.

c. Ensure resource efficiency and reduce embodied carbon emissions by sourcing and prioritising materials that can easily be maintained, repaired and renewed across the development lifetime.

d. Minimise the environmental impact of materials by specifying sustainably-sourced, low impact and re-used or recycled materials; this should include identifying opportunities for the retention and reuse of existing materials on site (e.g. re-using demolition material on site). Materials should be locally-sourced wherever possible to minimise transport emissions.

2. All development resulting in the creation of 10 or more dwellings or 500sqm or more non-residential GIA must submit a Circular Economy Statement utilising the guidance and principles set out by the GLA (Conserve resources, increase efficiency and source sustainably, Design to eliminate waste (and for ease of maintenance) and Manage waste sustainably and at the highest value) and undertake a Whole Life-Cycle Carbon assessment proportionate to the scale of development and demonstrate that whole life-cycle carbon savings have been maximised.

Waste

16.44 Boroughs are required to allocate sites and identify waste management facilities in order to provide sufficient capacity to manage the apportioned tonnages of waste, as set out in the London Plan. 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). The Plan sets out how the boroughs will jointly manage their waste apportionment requirements as set out in the London Plan. The WLWP is due for review by 2031.

16.45 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. For example, logistics hubs that support last mile deliveries by electric vans or cargo bikes as set out in Policy 22 could be used to distribute surplus food 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. As set out in more detail in our Refuse and Recycling: Storage and Access Requirements SPD, proposals for new developments should integrate refuse and recycling within the scheme without causing undue noise and odour nuisance or other impacts on amenity and living conditions. Construction Environment Management Plans are required where development is proposed that uses the river to transport construction materials and waste, in addition to site waste management plans.

16.46 Waste sites should only be released to other land uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput of the intended site over the last five years.

16.47 The Council will apply the policies of the WLWP over the lifetime of the Local Plan 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 and the London Plan will be used for assessing proposals for new or additional waste management facilities in the borough.

Circular economy

16.48 The aim of a circular economy is to address the problems of resource use by rejecting the take-make-dispose model of production and consumption that has persisted in the past. Instead, waste is “designed out” and materials are kept at a high value for longer through reuse, repair and recycling.

16.49 A more circular economy will:

1. reduce waste,
2. drive greater resource productivity,
3. deliver a more competitive economy,
4. position the UK to better address emerging resource security/scarcity issues in the future, and
5. help reduce the environmental impacts of production and consumption.

16.50 The construction of a development uses energy and resources, which represent its embodied carbon emissions. As buildings become more energy efficient and energy generation is decarbonised, the proportion of operational emissions will significantly reduce and embodied carbon will represent a higher proportion of whole life-cycle carbon emissions. Addressing these carbon emissions are key to achieving UK, London and Richmond Borough targets on net zero. All new build development will be expected to endeavour to minimise embodied carbon in line with best practice targets contained within the Mayor's Whole Life-Cycle Carbon Assessments London Plan Guidance(2022) and other latest industry guidance.

16.51 Circular economy opportunities in developments might include using materials with a lower embodied carbon (e.g. timber rather than concrete frame), using more recycled content in the materials and finding other ways to enhance recovery and recyclability (e.g. reinforcement free concrete). Mechanical and electrical services should therefore be designed to allow easy repair, recovery, reconditioning and reuse whilst also optimising for performance and carbon emissions. Encouraging a 'fabric first' approach to building design can also minimise mechanical plant and services in favour of natural ventilation.

16.52 Circular Economy Statements are intended to cover the whole life-cycle of a development and to demonstrate how a development will incorporate Circular Economy measures into all aspects of the design, construction and operation process. A Circular Economy Statement should demonstrate:

1. how all materials arising from demolition and remediation works will be re-used and/or recycled
2. how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
3. opportunities for managing as much waste as possible on site
4. adequate and easily accessible storage space and collection systems to support recycling and re-use
5. how much waste the development is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
6. how performance will be monitored and reported.

16.53 The Mayor has published guidance on the production of Circular Economy Statements.

Policy 8

Flood Risk and Sustainable Drainage (Strategic Policy)

A. All developments will need to be made safe for their lifetime and clearly demonstrate that they avoid, ~~minimise~~ or reduce contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers; taking account of climate change and that they do not increase 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. A sequential approach should be taken to the layout of sites, locating development in areas at lowest risk from flooding on a site. Unacceptable developments and land uses will be refused in line with national policy, the requirements set out in the Council's Strategic Flood Risk Assessment (SFRA) and as outlined in the table below.

B. To enable development, proposals must provide mitigation and resilience against flood risk as set out in the Council's SFRA, *including but not limited to adequately raising finished floor levels, providing flood storage compensation and alleviation.* ~~and provide appropriate compensation to existing flood risk levels and volumes, addressing the predicted 1 in 100 year Risk of Flooding from Surface Water (RoFSW) mapped depths as a minimum.~~ Advice should

be sought from the Lead Local Flood Authority (LLFA) and/or the Environment Agency as appropriate.

C. For all proposals on sites of 10 dwellings or more, or 1000sqm of non-residential development or more, in Flood Zones 2 and 3, or in areas at Risk of Flooding from Surface Water in a 1 in 100 year event or greater, or within a Surface Water Management Plan hotspot, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted.

D. Where a Flood Risk Assessment is required, appropriate ~~on-site attenuation~~ measures to alleviate ~~both~~ fluvial*, undefended tidal* and surface water flooding should be provided over and above the minimum ~~fluvial and undefended tidal~~ flood storage compensation and *on-site attenuation* requirements, where feasible *and justified by appropriate evidence*.

E. Where possible, land within major development sites should be safeguarded for potential flood mitigation use through the active consideration of predicted flood mapping from all sources.

Table 16.4 Flood Zones, Restrictions, and Requirements

Zone	Land use and development – restrictions	Sequential Test	Exception Test	Flood Risk Assessment
Zone 3b	The functional floodplain as identified in the Council's Strategic Flood Risk Assessment will be protected by not permitting any form of development on undeveloped sites unless it: • is for Water Compatible development; • 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. Redevelopment of existing developed sites will only be supported if there is no additional built development proposed within the undeveloped functional floodplain, no increase in vulnerability and a net flood risk reduction is proposed; any restoration of the functional floodplain will be supported.	Required for essential utility infrastructure	Required for essential utility infrastructure	Required for all development proposals

Zone	Land use and development – restrictions	Sequential Test	Exception Test	Flood Risk Assessment
	Proposals for the change of use or conversion to a use with a higher vulnerability classification will not be permitted.			
Zone3a and areas at Risk of Flooding from Surface Water in a 1 in 100 year event.	Land uses are restricted to Water Compatible, Less Vulnerable and More Vulnerable development. Highly Vulnerable developments will not be permitted. Self-contained residential basements and bedrooms at basement level will not be permitted.	Required for all developments unless exceptions outlined in the supporting text to this policy apply	Required for more vulnerable development	Required for all development proposals
Zone 2	No land use restrictions Self-contained residential basements and bedrooms at basement level will not be permitted.	Required for all developments unless exceptions outlined in the supporting text to this policy apply	Required for highly vulnerable development	Required for all development proposals unless for change of use from water compatible to less vulnerable
Zone1	No land use restrictions	Not applicable	Not applicable	A Drainage Statement is required for sites all major developments. Required for all other development proposals where there is evidence of a risk from other sources of flooding, including surface water, ground

Zone	Land use and development – restrictions	Sequential Test	Exception Test	Flood Risk Assessment
				water and sewer flooding

Throughflow and groundwater:

F. In line with the Council's SFRA, the following catchment areas have been designated as throughflow and groundwater policy zones:

1. Richmond Hill (Richmond)
2. Strawberry Hill (Twickenham)
3. Marble Hill (Twickenham)
4. St Margarets West

G. Subsurface structure development proposals within these zones need to fulfil site-specific requirements to demonstrate that basements, cellars, and other subsurface structures can be safely developed without increasing throughflow and groundwater related flood risk.

Sustainable Drainage

H. The Council requires the use of Sustainable Drainage Systems (SuDS) in all development proposals to manage surface water runoff as close to its source as possible, using the most sustainable solutions to reduce runoff volumes and rates. Ideally, all surface water should be managed on site. The development must not increase flood risk elsewhere and where possible reduce flood risk overall. 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.~~ a runoff rate of 2 l/s or below~~.~~, ~~or~~

~~b.~~ ~~a~~ *Where this is not possible and justification is provided, applicants should detail how at least* 50% attenuation of the site's surface water runoff at peak times based on the levels existing prior to the development*, will be achieved*.

Flood defences:

I. Applicants will have to demonstrate that their proposals complies with the following:

1. Retain the effectiveness, stability and integrity of flood defences, riverbanks and other formal and informal flood defence infrastructure.
2. Ensure the proposal does not prevent essential maintenance and upgrading from being carried out in the future.
3. Unless exceptional circumstances are demonstrated for not doing so, all development should be set back from riverbanks and existing flood defence infrastructure to allow for any foreseeable future maintenance and upgrades in a sustainable and cost effective way. This must be a minimum of 16 metres from the landward side of any tidal flood defences and 8 metres for other main rivers including culverted main rivers, although a greater set back may be required on some sites. Where the minimum requirements cannot be met, evidence to justify this must be submitted at planning application stage and agreed by the Environment Agency.

4. Take into account the requirements of the Thames Estuary 2100 Plan and the River Thames Scheme, and demonstrate how the current and future requirements for flood defences have been incorporated into the development. This includes ensuring that no new active flood defences are delivered as part of a development and that any developments coming forward that currently use active flood defences replace them with permanent flood defences.
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.

J. In addition, in line with the requirements of the Thames Estuary 2100 Plan, developments adjoining the River Thames must maintain and where necessary enhance or raise *(or demonstrate how they could be raised in the future)* flood defences to the ~~2065~~ statutory level as set out in the TE2100 Plan *(or latest version)* ~~(or show how they could be raised in the future)~~, demonstrating that they will continue to provide adequate flood protection for the lifetime of the development. In alignment with the Council's SFRA, developments on the river should make the most of the opportunities presented by regeneration and redevelopment on river corridors to reduce fluvial flood risk through location, layout and design of development. Opportunities should also look at flood compatibility, flood resilience and maximising open space for flood water.

Basements in areas of Flood Risk:

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

Table 16.5 Basements in Areas of Flood Risk

Flood Zone where the basement is located	Guidance that developments should follow
Flood Zone 3b (Functional Floodplain)	Basements, basement extensions, conversions of basements to a higher vulnerability classification or self-contained units will not be permitted.
Flood Zone 3a (Tidal / Fluvial)	*In areas of Extreme, Significant and Moderate Breach Hazard (as set out in the Council's SFRA):* • **New basements**: • restricted to Less Vulnerable / Water Compatible use only. • More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed. Bedrooms at basement levels will not be permitted. • Highly Vulnerable' such as self-contained basements/bedrooms uses will not be permitted. • **Existing basements**: • No basement extensions, conversions or additions for 'Highly Vulnerable' use • More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed. *In areas of Low or No Breach Hazard (as set out in the Council's SFRA):*

Flood Zone where the basement is located	Guidance that developments should follow
	• **New basements:** if the Exception Test (where applicable) is passed, basements may be permitted for residential use where they are not self-contained or used for bedrooms • **Existing basements:** basement extensions, conversions or additions may be permitted for existing developments where they are not self-contained or used for bedrooms. 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.
Flood Zone 2	*In areas of Extreme, Significant and Moderate Breach Hazard (as set out in the Council's SFRA):* • **New Basements:** if the Exception Test (where applicable) is passed, basements may be permitted for residential use where they are not self-contained or used for bedrooms. • **Existing Basements**: basement extensions, conversions or additions maybe permitted for existing developments where they are not self-contained or used for bedrooms. 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.
Flood Zone 1	No restrictions on new or extensions to existing basements
Through-flow and ground-water policy zones	Basement and cellar developments within these throughflow and groundwater policy zones must be confined to the curtilage of the site. In addition, they should not exceed a maximum of 50 percent of each garden or open space area of the site. A Screening Assessment must be carried out for all basement and cellar proposals in the throughflow and groundwater policy zones. Information provided in the screening assessment should address the following areas: a. Subterranean characteristics b. Land stability (including site slope) c. Flood risk and drainage (including throughflow, groundwater and surface water). If the proposed subsurface development may have an impact on the local environment, or if further investigation work is required, then a Basement Impact Assessment, carried out and signed off by a chartered professional, is required.

Flood Zone where the basement is located	Guidance that developments should follow
Basements and flood defences	New basements must be structurally independent from the flood defences, or sited outside of the zone of structural influence, whichever distance is greater.

Climate Change Allowance:

L. Submitted FRAs should utilise the ~~'central'~~ *appropriate* climate change scenarios when implementing the climate change allowances for surface water and fluvial flood risk. Assessments of tidal flood risk should use the current TE2100 crest levels guidance and breach modelling to account for worst-case scenarios.

16.54 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.

Sequential Test and Exception Test

16.55 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.

16.56 The Sequential Test is required for all developments except for development proposals categorised as 'Highly Vulnerable' – 'Highly Vulnerable' development is not permitted (see 'Land Uses and Development Restrictions' section of this table). Developments categorised as 'Essential Infrastructure' and 'More Vulnerable' can only be considered following application of the Exception Test.

16.57 The Sequential Test is the first stage in addressing flood risk where this is an issue in the determination of a planning application. Following the application of the Sequential Test (where required), the two-part Exception Test as set out within the NPPF and PPG has to be applied, the aim of which is to ensure that wider sustainability benefits and the safety of users of a development are taken into account in the decision-making process. It is strongly recommended that applicants satisfy themselves that their proposals are capable of passing both the Sequential and Exception Tests prior to the submission of an application.

16.58 The Council has adopted its own Sequential Test approach and development requirements for town centres and local centres in the borough. Many of the borough's properties are located in and around town and local centres. Some centres are located in Flood Zones 2 and 3; however, relocating development away from these centres and their immediate surrounding vicinity is not always a realistic option due to the community role these areas play in the borough. 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. Therefore, the Council – in liaison with the Environment Agency – has developed a local Sequential Test approach. The local Sequential Test approach is applicable for town centres, local centres, and areas that fall within the 800m buffer boundary for each centre. An 800m buffer was selected as it is considered a community sustaining walking distance for a person not living with/having a physical disability.

16.59 The Sequential Test will not be required if the development proposal meets at least one of the following:

- It is within a town centre or local centre boundary;
- It is for residential development or a mixed-use scheme and within the 800m buffer area identified within the town centre or local centre.

16.60 The local Sequential Test approach is also applicable for certain development proposals outside of the requirements above. The Sequential Test will not be required if the proposed development:

- Is a site allocation in the Local Plan 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.
- Is for the redevelopment of an existing single residential property.
- Is for a conversion or change of use.

16.61 The Sequential Test will be required in all other cases.

16.62 The onus is on the applicant to demonstrate that the Sequential Test can be passed, and therefore the necessary relevant information needs to be submitted as part of the planning application. It is for the Council to consider the extent to which the Sequential Test considerations have been satisfied. In line with the NPPF and PPG, the Council will refuse applications that fail the Sequential Test even where the Exception Test has been passed. Further guidance and advice can be found in the Council's SFRA, NPPF and PPG.

16.63 In addition, the Council requires the application of a sequential approach to the layout of sites, whereby it is necessary for the applicant to demonstrate how development and more vulnerable uses have been located in areas at lowest risk from flooding on a specific development site.

Functional Floodplain

16.64 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.

16.65 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 by not proposing additional built development within undeveloped functional floodplain, 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 in Table 6-1, 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.

16.66 The borough contains a number of islands in the River Thames. Where the access and egress to and from the island begins 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. *For the River Thames, the functional floodplain is defined as land riverward of the Thames Tidal Flood Defences.* In line with the guidance set out in the Council's SFRA, new developments are restricted to 'Water Compatible' and 'Essential Infrastructure' (subject to an Exception Test) as per the guidance in the Flood Risk and Coastal Change PPG.

Flood Risk Assessments

16.67 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. All new development needs to take account of the latest climate change allowances. This should be included as part of the Flood Risk Assessment process. This will help minimise vulnerability and provide resilience to flooding in the future.

16.68 Flood Risk Assessments need to consider flood risk from all sources. 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 9 '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, sources that need to be assessed and mitigated.

Flood Risk Mitigation and Resilience

16.69 For fluvial flooding, the finished floor levels for all developments of all vulnerability classifications must be set a minimum of 300mm above the 1 in 100 plus appropriate climate change allowance flood level. For developments impacted by defended tidal flooding, as a minimum all sleeping accommodation must be located on finished floor levels above the Thames Tidal Breach 2100 flood level. This is to ensure development is safe for its lifetime for future occupants and users. Further information on flood risk mitigation and resilience is set out in the SFRA at Table 6-1.

16.70 *In relation to surface water flooding in line with the current SFRA, proposals must provide mitigation and resilience against flood risk (taking advice from the LLFA as appropriate) and provide appropriate compensation to existing flood risk levels and volumes (addressing the predicted 1 in 100 year RoFSW mapped depths as a minimum), supported by detailed flood risk modelling if appropriate.*

16.71 In relation to flood storage compensation, all relevant development proposals must ensure appropriate flood storage compensation is provided for the fluvial and undefended tidal floodplain (which is riverward of the flood defences). For the fluvial floodplain, any loss of flood storage within the fluvial 1 in 100 inclusive of climate change flood extent must be compensated for on a level-for-level and volume-for-volume basis. For the undefended tidal floodplain, to ensure there is no loss of flood storage there should be no increase in built footprint or raising of ground levels as level-for-level and volume-for-volume flood storage compensation is not achievable in this location. If water compatible structures, such as pontoons or slipways, are proposed, they should be designed to minimise the loss of flood storage i.e. by being floodable, hollow structures rather than concrete, solid structures.

16.72 *A FRA should contain the evidence for the preferred method of mitigation, including any alternatives it was not possible to provide and detail how any associated risks from the chosen form of mitigation can be minimised.*

Sustainable drainage

16.73 These mimic natural drainage patterns to manage rainfall and surface water runoff close to the source. They manage the transport of water and the speed that it runs off hard surfaces before it enters watercourses. They can be designed to store water and control its infiltration into the ground to allow for evaporation and transpiration.

16.74 Developments should reduce surface water discharge in line with the Sustainable Drainage Hierarchy set out in Policy SI13 of the London Plan, and the actions should also be taken in line with the London Sustainable Drainage Action Plan (LSDAP). *In line with Policy SI13 Part E: Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.*

16.75 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.

16.76 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:

1. ~~Store~~ rainwater ~~for later~~ use as a resource (for example rainwater harvesting, blue roofs for irrigation)
2. ~~Use infiltration techniques, such as porous surfaces in non-clay areas~~ rainwater infiltration to ground at or close to source
3. Rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)
4. Rainwater discharge direct to a watercourse (unless not appropriate)
5. Controlled rainwater discharge to a surface water sewer or drain
6. Controlled rainwater discharge to a combined sewer.

16.77 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 9 Water Resources and Infrastructure.

16.78 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 runoff rate of 2 l/s or below *Where this is not possible and justification is provided, applicants should detail how at least;* ~~or a~~ 50% attenuation of the site's surface water runoff at peak times, based on the site's performance prior to development*, will be achieved*.

16.79 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.

16.80 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. 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

16.81 Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Development should be set back from flood

defences to allow for any foreseeable future maintenance and upgrades in a sustainable and cost-effective way.

16.82 Natural flood management methods, such as those included in the Thames Landscape Strategy's 'Rewilding Arcadia' project, should be employed in development proposals due to their multiple benefits including increasing flood storage and creating leisure areas and habitat. There is the potential to achieve significant improvements when undertaking flood defence work, including improved public spaces, access to the river and the Thames Path, and the creation of new habitats. Development should where possible seek to implement those measures set out in Policy 40 Rivers and Corridors when mitigating flood risk*, in line with the Riverside Strategy Approach set out in the Thames Estuary 2100 Plan*.

16.83 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. The Council encourages the return of currently engineered riverbanks to a more natural state where this is possible. The majority of formal flood defences are privately owned, and it is the flood defence owner's responsibility for maintaining those formal flood defence structures as outlined in the Metropolis Management (Thames River Prevention of Flood) Act 1879 to 1962.

16.84 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.

16.85 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 at least 8 metres on the borough's rivers (including the fluvial Thames and culverted main rivers) and 16 metres for the tidal Thames. For some sites, where they are specifically defended by embankments, development may need to provide more than 16 metres set back to allow for future raisings. In addition, an Environment Agency Flood Risk Activity Permit (FRAP) is required for certain activities that take place within either 8 metres or 16 metres from the main river, flood defence and/or a culvert. Development must be set back to allow for the maintenance and future upgrading of the flood defences as well as for improvements to flood flow and flood storage capabilities. There may be situations where it is not feasible to set back development by the above amounts. Where applicants wish to depart from these standards, full justification must be provided at planning application stage and agreed with the Environment Agency. 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.

16.86 *The Council supports proposals for strategic flood alleviation measures (and associated enabling works), including the emerging flood alleviation measures at Teddington and Molesey weirs, as part of the wider River Thames Scheme. The project is designed to significantly reduce the risk of flooding by creating a new river channel in two sections alongside the Thames in Runnymede and Spelthorne, as well as increasing capacity at Sunbury, Molesey and Teddington weirs. These proposed works will increase the capacity of the Thames through Surrey and south west London, reducing the risk of flooding.*

Basements and subterranean developments in flood affected areas

16.87 While Policy 54 Basements and subterranean developments applies to basement proposals in the whole borough, the focus of this policy

is on basements within flood affected areas of the borough, where they represent a particularly high risk to life, and it is essential that careful consideration is given to their design and use. If proposing a basement in flood affected areas, this policy in addition to Policy 54 applies.

16.88 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. The Council has produced a Basement Assessment User Guide (2021), which provides advice where proposals include a basement, cellar, or other subsurface structure. It is designed to guide users through the basement assessment process and ensure that the correct supporting information is submitted with a planning application. In addition, the Council has produced Guidance on Basement developments, which provides advice on both planning as well as non-planning matters for all basement construction in the borough. It covers permits and requirements and local amenity, construction and design issues.

16.89 This policy restricts basement developments in areas of Extreme, Significant and Moderate Breach Hazard, as set out in the Council's SFRA and 'More Vulnerable' (such as residential) uses will only be considered if a site-specific Flood Risk Assessment can demonstrate that the risk to life can be managed. 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. This includes throughflow and groundwater policy zones (see SFRA), wherein a Screening Assessment must be carried out as part of the planning application submission for all basement and cellar proposals.

16.90 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. By virtue of the low lying nature of basements, they are vulnerable to many types of flooding and in particular sewer flooding. Therefore, all new basements with a waste outlet (such as toilets, bathrooms, utility rooms) will need to be protected from sewer flooding through the installation of a suitable (positively) pumped device, which will need to be shown in drawings submitted with a planning application.

16.91 The Council's SFRA sets out further guidance on basements, including how to assess ground floor level and internal access level requirements for basements. The SFRA also sets out the locations of through-flow and ground-water policy zones. Subsurface structure development proposals within these zones need to fulfil site-specific requirements to demonstrate that basements, cellars, and other subsurface structures can be safely developed without increasing throughflow and groundwater related flood risk.

16.92 A Screening Assessment is required as part of the planning application submission for all basement and cellar proposals within the throughflow and groundwater policy zones. The Screening Assessment should address the impacts of the proposed subsurface development on the area's subterranean characteristics, land stability, and flood risk and drainage. If the Screening Assessment determines that the proposed subsurface development may have an impact on the local environment, or if it determines that further investigation work is required, then a Basement Impact Assessment is required.

16.93 The Basement Impact Assessment, undertaken by an appropriate chartered professional or specialist, must include, but is not limited to, the following details:

1. Detailed borehole information on or from nearby to the development site. At least two data recordings should take place within a period of at least 12 months to demonstrate any potential seasonal variations. These measurements should identify the geological conditions on or close to the development site, the infiltration potential, and the height of any groundwater.
2. Mitigation if the identified potential impacts of the proposed subsurface development are not acceptable. If, for example, the assessment identifies that the proposed development may result in water ingress to the new development and/or to neighbouring properties, then

mitigation measures should be proposed to reduce and/or alleviate the risk of flooding.

16.94 To ensure that such development is feasible and will not adversely impact the site, neighbouring properties, or the wider natural environment, such assessments should be completed prior to any planning permission being granted.

Policy 9

Water Resources and Infrastructure (Strategic Policy)

A. The borough's water resources and supplies will be protected by preventing development that would pose a threat to the borough's rivers, surface water and groundwater quality and quantity. This includes pollution caused by water run-off from developments into waterways

~~**Water quality**~~

B. The development or expansion of water supply or wastewater 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 and that any such impact is minimised as far as possible.

Water quality

C. The Council expects development proposals to:

1. protect the water quality of rivers and groundwater; where rivers have been classified by the Environment Agency as failing to meet 'good' status, any development affecting such rivers is encouraged to improve the water quality in these areas.
2. seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided;
3. take action to minimise the potential for misconnections between foul and surface water networks.
4. demonstrate within a Construction Management Plan that there will be no potential contamination of surface or ground water (see Policy 53 'Local Environmental Impacts').

Water and Sewage Infrastructure

D. New major residential and major non-residential development will need to provide information *as part of a planning application* that shows *early engagement by the applicant with the sewerage and water supply network provider, to demonstrate the provider can meeting their duty to ensure* there is adequate water supply, ~~surface water,~~ foul drainage and sew~~er~~age treatment capacity to serve the development.

E. Planning permission will only be granted for developments which increase demand for water services if there is:

1. sufficient capacity already, or
2. Extra capacity can be provided in time to serve the development, and will not adversely affect the environment and amenities of local residents

F. ~~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.~~

~~G.~~ 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

16.95 Population increase*, coupled with the designation of the Thames Water region as an area of 'seriously water stressed',* means extra demand for water, while climate change simultaneously is putting a strain on water supplies particularly through the increasing frequency of pro-longed summer drought conditions and higher summer temperatures. Development can have significant detrimental impacts on water resources. This may be by placing additional strain on existing water supplies, or by affecting flood patterns through increasing the amount of impermeable land in areas at risk of flooding. The existing sewer system may not have capacity for increases in wastewater and from increases in heavy rainfall events due to climate change.

16.96 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.

16.97 The pollution of water resources through development may also cause significant harmful impacts on the health and wellbeing of sensitive receptors, both directly and indirectly, along with the degradation of the natural environment and local amenity.

16.98 Under the Water Framework Directive (WFD), there are four river water-bodies in this borough, all of which fail to achieve 'good' ecological status. 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. Under the WFD, any deterioration of water bodies (groundwater and surface waters) needs to be prevented; 'good status' or 'good ecological potential' should be achieved by 2027. Therefore, 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. A flood risk activity permit may need to be submitted to the Environment Agency (see Policy 8 and Policy 40 of this Plan).

16.99 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 sensitive in terms of groundwater and surface water receptors, in order to protect the surface water courses and groundwater quality in the borough's aquifers. So that contamination of local surface water and groundwater bodies does not occur, development proposals may require an environmental permit if construction sites are dealing with the discharge of liquid or wastewater (also see Policy 53 in relation to Construction Management Plans).

Water and sewage provision

16.100 Many existing water mains, sewerage systems and treatment works are becoming overloaded. Water companies are responsible for ensuring that water supply, drainage and wastewater infrastructure is in place in advance of new development coming forward. A statutory duty is placed on the water

industry to meet such infrastructure needs, and 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.

16.101 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. Planning conditions will be used to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are strongly encouraged to contact the water/wastewater company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. *This is considered to accord with London Plan Policy SI 5 part E.*

16.102 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. *There may be a requirement for phasing of development where necessary infrastructure upgrades are due to be delivered, to ensure development does not outpace essential network reinforcement.* 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 provision of, or improvements to, infrastructure. Sewers and associated infrastructure will need to be protected from new construction and tree planting.

17 Delivering new homes and an affordable borough for all

Policy 10

New Housing (Strategic Policy)

A. The Borough's ~~ten year~~ *London Plan* housing ~~target~~ *requirement* is 4,110 homes*, with a total Local Plan housing requirement of 5,928 dwellings over the plan period from 2024-2039. Housing delivery will be in accordance with the following stepped trajectory*:~~.~~

- *2021/22 to 2024/25 – 210 dwellings per annum*
- *2025/26 to 2027/28 – 420 dwellings per annum*
- *2028/29 to 2030/31 – 670 dwellings per annum*

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 over the next 10 years:

Table 17.1 Indicative net housing completions by area

Area	Wards [1]	Approximate No of units
Richmond	South Richmond; North Richmond; Kew	1,100 – 1,200
Ham & Petersham Neighbourhood Area	Ham, Petersham and Richmond Riverside[2]	300 - 400
Twickenham	Twickenham Riverside; St Margarets and North Twickenham; South Twickenham; West Twickenham	1,100 – 1,200
Teddington and the Hamptons	Hampton North; Hampton; Fulwell and Hampton Hill; Teddington; Hampton Wick	900 – 1,000
Barnes and East Sheen	East Sheen; Mortlake and Barnes Common; Barnes	800-900
Whiton	Whitton; Heathfield	50-100

17.1 The London Plan sets a ten year target of 4,110 homes for net housing completions, for the borough of Richmond. This is to cover the period 20~~19~~*21*/2~~0~~*2* -20~~28~~*30*/~~29~~*31* although it was finally confirmed on publication of the London Plan in March 2021, and can be rolled forward for future years beyond 2029. The indicative target beyond 20~~29~~*32* is ~~3,639 homes for net housing completions, or~~ 306 homes per annum, based on rolling forward in accordance with the London Plan identified capacity for large sites and the small sites figure, until it is replaced by a revised target in a new London Plan.

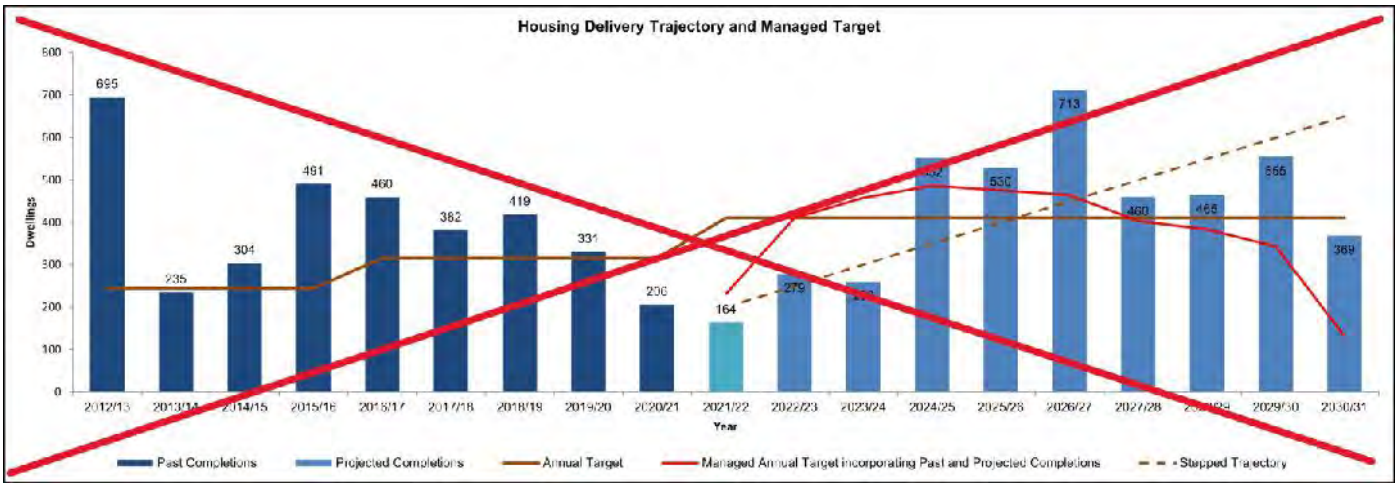
17.2 In accordance with London Plan Policy H1 this target is expected to be achieved, through optimising the potential for housing delivery on all suitable and available brownfield sites. The Local Housing Needs Assessment 2021 analysis considers demographic trends and a scenario to understand the potential population growth associated with the ~~delivery of 411 homes per annum~~ *proposed housing delivery over the Local Plan period*.

17.3 The Government has set out the importance of building the homes that communities need and putting in place measures to supply housing delivery. There is a standard method

1 New ward boundaries come into effect in Richmond at the Council elections in May 2022.
2 The Ham, Petersham and Richmond Riverside ward boundary extends further than the neighbourhood area including Richmond Hill.

for assessing local housing need which provides a starting point in determining the number of homes needed in an area, and Government guidance is clear that the responsibility for the overall distribution of housing need in London lies with the Mayor. In December 2020 the Government published a revised methodology with a 35% uplift applied to London, however the Government is clear this will only be applicable once the next London Plan is being developed.

17.4 A housing trajectory is published and annually updated, in the Council's Authority Monitoring Report (AMR). ~~This~~ *It* is required by the NPPF and identifies a supply of specific deliverable sites sufficient to provide five years supply 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.



17.5 Although the housing target is monitored on an annual basis, the London Plan at paragraph 4.1.10 sets out that the increase in housing delivery required by the target may be achieved gradually and boroughs are encouraged to set a realistic, stepped housing delivery target over a ten-year period. This is considered relevant to the borough, given the shortfall in delivery in ~~2021/22 and the~~ initial ~~future~~ years, balanced against the considerable increase expected in small sites delivery whereby there will be a time lag for the change in the policy context towards incremental intensification to result in proposals coming forward, and given some identified large sites are expected to deliver in years five to ten. Government has also acknowledged the disruption to housing delivery and monitoring caused by restrictions in 2020 in response to the COVID-19 pandemic. *The stepped trajectory based on the Housing AMR 2023/24 is set out within Policy 10 and will form the basis of the monitoring framework and become part of future Housing Delivery Test calculations.*

17.6 The latest housing Authority Monitoring Report (reviewed annually) sets out that the borough is on course to meet and exceed the strategic dwelling requirement over a ~~ten year~~ *the plan* period. This is reflected in the broad expected pattern of future housing land supply set out in Policy 10 part B, which sets out indicative ranges for the broad areas and are not to be regarded as any lower or upper

limit, as the overall target is to be exceeded. The site allocations as set out within this Plan will contribute to this delivery.

17.7 The rationale from Government and the Mayor of London for driving a step change increase in housing delivery is clear. Meeting the higher housing target in the London Plan will be a challenge, given the constraints in the borough and meeting other plan priorities. 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.

17.8 The Urban Design Study has identified capacity for growth in the borough. The Council will encourage higher density development in more sustainable locations, such as ~~main~~ *town* centres and areas better served by public transport, subject to compatibility with established character. Development should optimise site capacity through the design-led approach. This, 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; see Policy 28 Local Character and Design Quality, Policy 44 Design Process, and Policy 45 Tall and Mid-Rise Building Zones. 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. A significant increase is expected in delivery from small sites, as set out in Policy 16 Small Sites.

17.9 There is a need to retain land in employment use, as set out in the theme 'Increasing jobs and helping business to grow and bounce back following the pandemic'. Housing delivery against the borough target is capable of being met without the release of employment land, although there may be limited potential for enabling housing gain on employment land if proposals comply with the requirements of Policies 23 and 24.

17.10 Proposals should optimise the potential of sites. The majority of housing delivery in the borough is expected to be on previously developed land. An updated Brownfield Land Register of sites appropriate for residential development is published each year. 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 based on an up to date evidence base, and thus other policies in this Plan would prevent building on greenfield sites.

17.11 The Government's Housing Delivery Test (HDT) is an annual measurement of housing delivery.~~:~~

- ~~Results of the 2018 HDT showed 1,332 homes delivery 2015/16 to 2017/18 against 945 homes required, a measurement of 141% and therefore no action required.~~
- ~~Results of the 2019 HDT showed 1,147 homes delivery 2016/17 to 2019/20 against 945 homes requirement, a measurement of 121% and therefore no action required.~~
- ~~Results of the 2020 HDT showed 1,024 homes delivery 2017/18 to 2019/20 against 918 homes requirement, a measurement of 112% and therefore no action required.~~
- ~~Results of the 2021 HDT showed 2,019 homes delivery 2018/19 to 2020/21 against 813 homes requirement, a measurement of 248% and therefore no action required. However, due to a change in the GLA methodology for monitoring, a revised housing flow return was submitted by the GLA which confirmed 877 homes delivery in this period, a measurement of 108%, and therefore no action required.~~

17.12 ~~For the 2020 measurement, a reduction in the period for measuring total homes required was applied, using an 11-month period for the 2019/20 monitoring year, to account for disruption to housing delivery and monitoring linked to the COVID-19 pandemic. For the 2021 measurement, Government applied a four-month reduction to account for continued~~

~~fluctuations due to COVID-19 disruptions. In accordance with the Government thresholds, if future delivery falls below 95% of the housing requirement, then an action plan will be produced to assess the causes of under-delivery and identify actions to increase delivery in future years.~~ The stepped ~~requirement~~ *trajectory* set out ~~above~~ *in Policy 10* will be used in future Housing Delivery Tests. See also Policy 55 Delivery and Monitoring.

Definitions for Affordable Housing

Genuinely Affordable Housing- The Council considers the following to be genuinely affordable housing products:

- *Rented Affordable (specifically* Social Rent~~.~~ *and* London Affordable Rent*)*.
- London Living Rent (only when delivered in compliance with the Council's Intermediate Housing Policy Statement 2019 or any further update) *(Intermediate)*.
- Shared Ownership (only when delivered in compliance with the Council's Intermediate Housing Policy Statement 2019 or any further update) *(Intermediate)*.

Policy 11

Affordable Housing (Strategic Policy)

Affordable Housing (Strategic Policy)

A. ~~All new housing developments in the borough should provide at least 50 per cent of the total number of habitable rooms as affordable housing on site. The affordable housing being provided should be genuinely affordable for the majority of residents in the borough.~~

B. ~~A contribution towards affordable housing will be expected on all housing sites. The following requirements apply:~~

1. ~~On 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.~~
2. ~~On all other sites capable of ten or more units gross 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.~~
3. ~~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.~~

Table 17.2 Affordable Housing Contribution Sliding Scale

~~No of units proposed (gross)~~	~~% Affordable Housing~~		
	~~For conversions and reversions (where there is no loss of former employment floorspace and for listed buildings)~~	~~For new build development or redevelopment (where there is no loss of former employment floorspace)~~	~~For any units replacing employment floorspace~~

No of units proposed (gross)	% Affordable Housing		
9	36%	45%	90%
8	32%	40%	80%
7	28%	35%	70%
6	24%	30%	60%
5	20%	25%	50%
4	16%	20%	40%
3	12%	15%	30%
2	8%	10%	20%
1	4%	5%	10%

C. Where on site provision is required, an application should be accompanied by evidence of meaningful discussions with Registered Providers which have informed the proposed tenure, size of units and design to address local priorities and explored funding opportunities, and informed the capital value of the affordable housing.

D. Where on site affordable housing is provided on site, the Council will require an affordable housing tenure split of 70% affordable rented housing and 30% intermediate housing by habitable room. The intermediate housing will be delivered in line with the Council's Intermediate Housing Policy Statement.

E. If the minimum level of affordable housing is not provided in line with Part B (1) and B(2) the application for development will be refused.

F. Site-specific viability information will only be accepted in exceptional cases, determined by the Council. Any proposals where site-specific viability evidence is accepted must provide the maximum amount of affordable housing, informed by detailed viability evidence. The cost of any independent review must be covered by the applicant.

G. If a site proposes a non-compliant level of affordable housing and is granted permission it will be subject to detailed review mechanisms (early, mid and late stage) throughout the period up to full completion of the development, including an advanced stage review mechanism. Sites that meet the 50% target for affordable housing will not be subject to a late stage review, only an early stage review to incentivise implementation.

H. In exceptional circumstances, where affordable housing cannot practically be provided on site, or off-site provision would create a better contribution (in terms of quantity and/or quality), the Council may accept provision of affordable housing off-site in the same area.

I. Developments involving the provision of affordable housing will be expected to achieve the same high quality standards as the private housing element of the scheme in terms of accessibility, internal space requirements, external appearance and design quality and provision of private outdoor space.

J. The Council will not accept the loss of any existing affordable housing, as set out in Policy 14. Loss of Housing, and will expect any estate regeneration to provide the equivalent amount and tenure of affordable housing by habitable room, and where possible, achieve an uplift in provision.

A. *The Council is seeking to deliver 50 per cent of the total number of habitable rooms as affordable housing, on a range of types of sites across the borough. A contribution towards affordable housing will be expected on all housing proposals. The affordable housing being provided should be genuinely affordable for the majority of residents in the borough.*

B. *Where on site affordable housing is provided, the Council will require a minimum affordable housing tenure split of 70% Rented Affordable housing and maximum 30% Intermediate housing by habitable room. The Intermediate housing will be delivered in line with the Council's Intermediate Housing Policy Statement. Where on site provision is required, an application should be accompanied by evidence of meaningful discussions with Registered Providers which have informed the proposed tenure, size of units and design to address local priorities.*

C. *Developments involving the provision of affordable housing will be expected to achieve the same high quality standards as the private housing element of the scheme in terms of accessibility, internal space requirements, external appearance and design quality and provision of private outdoor space.*

D. *The Council will not accept the loss of any existing affordable housing as set out in Policy 14. Loss of Housing, and will expect any estate regeneration to provide the equivalent amount and tenure of affordable housing by habitable room, and where possible, achieve an uplift in provision.*

Major Sites (capable of providing 10 dwellings or more (gross))

E. *For all major developments, applicants can follow the Fast Track Route by providing the relevant threshold level of affordable housing and meeting other Local Plan requirements.*

F. *Schemes that do not meet the threshold level, or require public subsidy to do so, will be required to submit detailed viability information through the Viability Tested Route. This will assess the maximum level of affordable housing (and any other required planning contributions) that a scheme can deliver in cases where the threshold level of affordable housing set out below cannot be met.*

Fast Track Route (FTR)

1. *In line with Policy H5 (Threshold approach to applications) of the London Plan, the threshold approach applies to major development proposals which trigger affordable housing requirements. The threshold level of affordable housing on gross residential development is:*

    a. *a minimum of 35 per cent; or*

    b. *50 per cent for public sector land where there is no portfolio agreement with the Mayor; or*

    c. *50 per cent for Locally Important Land & Business Parks (the borough's Locally significant Industrial Sites (LSIS) as identified in Policy 24) and any non-designated industrial land that comes forward for residential uses in accordance with London Plan Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity.*

2. *To follow the Fast Track Route, applications must meet the criteria set out in London Plan Policy H5(C). The Council considers the tenure mix of 70% Rented Affordable housing as a minimum and 30% Intermediate housing as a maximum, and higher levels of Rented Affordable housing are encouraged. Applicants should ensure they seek all opportunities to secure grant to maximise the number of affordable habitable rooms onsite.*

3. *Fast tracked applications are not required to provide a viability assessment at application stage. To encourage delivery and determine whether additional affordable housing can be provided, the requirement for an early-stage viability review will be triggered if an agreed level of progress on implementation is not made within 18 months of the permission being granted (or a period agreed by the Council).*

Viability Tested Route (VTR)

4. *On all Locally Important Land & Business Parks (the borough's Locally Significant Industrial Sites (LSIS) as identified in Policy 24) and any non-designated industrial land and public land sites at least 50% on-site provision is sought. Where possible, a greater proportion should be achieved.*

5. *On all other sites the Council expect a minimum of 50% affordable housing with a minimum affordable housing tenure split of 70% Rented Affordable housing and maximum 30% Intermediate housing by habitable room.*
6. *Any application triggering affordable housing is expected to be accompanied by evidence of meaningful discussions with Registered Providers as set out in part (B) and explored funding opportunities to maximise the affordable housing to meet local priorities, and informed the capital value of the affordable housing.*
7. *Any proposals submitted through the Viability Tested Route that provide less than 50% affordable housing will be expected to provide detailed site-specific viability evidence in a standardised and accessible format to justify affordable housing has been maximised on-site. The cost of any independent review must be covered by the applicant.*
8. *If an application is following the Viability Tested Route where the site proposes a non-policy compliant level of affordable housing and is granted permission it will be subject to detailed review mechanisms (early, mid and late stage) throughout the period up to full completion of the development, including an advanced stage review mechanism.*
9. *In exceptional circumstances, where affordable housing cannot practically be provided on site, or off-site provision would create a better contribution (in terms of quantity and/or quality), the Council may accept provision of affordable housing off-site in the same area.*

Small Sites (1-9 dwellings (gross))

G. *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. If a site proposes a non-policy compliant level of affordable housing, the cost of any independent review must be covered by the applicant.*

Table 17.3 Affordable Housing Contribution Sliding Scale

No of units proposed (gross)	***% Affordable Housing***		
	For conversions and reversions (where there is no loss of former employment floorspace and for listed buildings)	*For new build development or redevelopment (where there is no loss of former employment floorspace)*	*For any units replacing employment floorspace**
9	*36%*	*45%*	*90%*
8	*32%*	*40%*	*80%*
7	*28%*	*35%*	*70%*
6	*24%*	*30%*	*60%*
5	*20%*	*25%*	*50%*
4	*16%*	*20%*	*40%*
3	*12%*	*15%*	*30%*
2	*8%*	*10%*	*20%*
1	*4%*	*5%*	*10%*

** Use Classes E (g) (i), (ii) (iii), B2, B8 and employment generating Sui Generis uses – this is applicable to all housing proposals in employment land. On sites that are capable of fewer than 10 units gross, by conversion or redevelopment, and it has already been agreed by the Council that on-site affordable housing is not suitable, offsite provision or an offsite contribution will be accepted.*

17.13 Richmond is a borough with a plethora of attributes such as its public parks, the river Thames and thriving centres which make it an attractive place to work and live. This results in people from not just London but all over the world wanting to make Richmond their home. However, due to the scarcity of land in the borough and other factors it is now experiencing an acute affordable housing crisis. Not enough affordable housing is being built to help alleviate the ever-growing need. Therefore, the Council will do everything in its power to make sure over the plan period ~~we hit~~ the 50% target *is achieved*.

17.14 Affordable housing does not just benefit the people who reside in these properties. To have a truly mixed and balanced community we need to provide homes that our teachers, firefighters, police officers, nurses, carers, trades people, mechanics, and retail workers can afford. This is not an exhaustive list but without these workers the borough would be simply worse off. Providing genuinely affordable homes for local key workers will also help towards Policy 1 Living Locally and the 20-minute neighbourhood, meaning key workers are able to live and work locally reducing in-commuting and making a more resilient community in the longer term. In addition having genuinely affordable properties to rent or buy means that residents can have more income to spend in the local economy which benefits local businesses.

17.15 The borough of Richmond has some of the highest house prices in the United Kingdom. To put the values into perspective below is a table of average house prices across all housing types in Richmond compared with London, outer London and the UK (Land Registry HPI June 2021).

Table 17.4 Average House Prices

Area	Average house price
Richmond	£702,846
London	£510,229
Outer London	£458,390
UK	£265,668

17.16 The need for affordable housing in the borough is demonstrable, which has been evidenced by the Council's Local Housing Need Assessment (LHNA). This study looks at the current need in the borough, need from newly-forming households and existing households falling into need, minus the supply of affordable housing which is equal to the net need per annum of affordable housing. The LHNA estimates a net annual need of 1,123 affordable rented and ~~552~~ *284* affordable home ownership products to be provided between 2021-2039. These unconstrained figures do not take account of capacity and land availability and are therefore significantly higher than Richmond's ~~overall annual~~ housing target of 411*0* homes ~~per annum~~ during the current London Plan period (2019-2041), which takes account of the borough's constraints.

17.17 Richmond has a finite amount of large-scale developable sites due to various constraints, including the Thames and the various parks and open spaces. Small sites make a significant contribution to housing supply. The London Plan Policy H2 has set a minimum target of delivering 234 homes per year from small sites in the borough of Richmond, 57% of the overall annual housing target. The cumulative impact of these sites should contribute to affordable housing provision, justified by the evidence base and local circumstances. Without these contributions it would be a significant challenge to deliver the amount of affordable housing this borough needs.

17.18 Contributions from small sites will be secured via a Planning Obligation. Financial contributions made to the ringfenced 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.

17.19 The affordable housing 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. In London the majority of development is brownfield and does not need to be incentivised, as in many cases the building will only have been made vacant for the sole purpose of re-development, therefore the Vacant Building Credit will not apply. A flowchart outlining the policy requirements and the mechanism for assessing the contributions from individual sites is set out in the Affordable Housing SPD; including how each proposal is assessed 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.

17.20 In the context of the Local Plan, genuinely affordable housing is primarily considered to be homes rented at either social rent or London Affordable Rent levels. The Council priority is social rented homes, as this is most affordable product available. Any schemes built through the GLA's current Affordable Homes Programme are expected to be for social rent. London Affordable Rent will be acceptable if evidence is provided that it will be affordable to the majority of residents living in the borough. Intermediate housing (such as Shared Ownership, London Living Rent) on site will only be considered genuinely affordable when delivered in compliance with the Council's Intermediate Housing Policy Statement 2019 (and any further updates to this). The Council's latest affordability criteria and priority allocation for Intermediate Housing includes key workers. At application stage the affordability of the affordable housing products provided will be assessed on the total cost of the home, including service charges. First Homes and Starter Homes are not considered to be affordable in the context of Richmond due to the borough's high house prices. There are areas of the borough where even a 50% discount on open market value would not reduce the price under the £420,000 cap set by National Government for First Homes. These extremely large reductions have the ability to impact the viability of schemes which in turn could jeopardise the provision of ~~affordable~~ *Social ~~r~~R*ented homes, which is the priority need in the borough.

17.21 The threshold (10 units or above) 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.

17.22 London Plan Policy H5 has set out a threshold approach where if a*n* ~~site meets~~ *application is providing at least* 35% affordable housing or 50% in the case of public sector or industrial land, then they will not need to submit a viability assessment at the application stage. This policy is aimed at fast tracking applications through the system that provide the threshold level without being held up by potentially protracted discussions regarding viability. *This approach seeks to embed affordable housing requirements into land values and create consistency and certainty across the Borough.* Richmond's affordable housing need is so great and the

borough has such a limited supply of major sites~~, using the threshold approach would have a detrimental impact on the Council achieving its goal of providing 50% affordable housing across the borough.~~ *that applicants will be expected to maximise affordable housing onsite. Where schemes follow the Fast Track Route and provide the relevant threshold level of affordable housing, applicants should ensure they seek all opportunities to secure grant to maximise the number of affordable housing onsite. Further guidance on the Fast Track Route is set out in the Mayor's Affordable Housing LPG (Consultation Draft 2023).*

17.23 The percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes. Figures should be presented as a percentage of total residential provision in habitable rooms, units and floorspace to enable comparison. The Council's Affordable Housing Enabling Officers will provide guidance and should be involved in the discussions with Registered Providers at an early stage, to determine the appropriate housing mix, including bedsize, to reflect local needs as set out in Policy 13 Housing Mix and Standards, taking into account the site-specifics of the location.

17.24 In the Local Plan 2018, the tenure split is 80/20 in favour of *Rented* ~~a~~*A*ffordable ~~rent~~ *homes* over ~~i~~*I*ntermediate products. The need for *Rented* ~~a~~*A*ffordable ~~rent~~ *homes* has not changed in the borough but there has been a change in policy within the London Plan. London Plan Policy H6 prescribes the affordable housing tenure split that London Boroughs should be applying in their policies. This is 30% low cost rent (social or London Affordable Rent), 30% intermediate (i.e London Living rent or Shared Ownership) and 40% to be determined by the borough. As the overriding need as evidenced by the LHNA in Richmond is for ~~low cost~~ *Social* ~~r~~*R*ented homes the whole of the 40% will be towards ~~that product~~ *Rented Affordable products with a priority to deliver Social Rented housing*. This is the reasoning for the policy's 70/30 split in favour of affordable rented products. The Council will still support (potentially through grant) any development, especially on public sector land, that provides a tenure split of 80/20 *Rented Affordable to Intermediate tenure*.

17.25 The Council has rigorously tested their affordable housing targets to make sure that they are viable through what is called a Whole Plan Viability Study. It is confirmed that the policy compliant level of affordable housing required on sites is viable ~~so the Council will not accept anything less~~. ~~Applications submitted that provide less affordable housing than set out in policy will be rejected.~~ The Council will in extraordinary circumstances and on a case-by case basis, accept viability arguments if it can be demonstrated that the site has abnormal costs that could not be foreseen. For example, infrastructure provision that could not have been foreseen at The Whole Plan Viability stage and need to be considered on a site-specific basis taking into account variations between private sales values, scheme composition and benchmark land value. The Council will only accept viability arguments once it has been confirmed that the applicant has explored with the relevant Council officers the availability and application of grant to increase or provide a better tenure of affordable housing.

17.26 Where *detailed* viability evidence is required *to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be treated transparently and* this will need to follow the guidance set out in RICS Assessing Viability in Planning under the National Planning Policy Framework 2019 for England (2021), National Planning ~~Policy~~ *Practice* Guidance, the Council's Affordable Housing SPD and the GLA's ~~Affordable Housing and~~ *Development* Viability ~~S~~*L*PG *(Consultation Draft 2023)*. 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. To confirm on-site deliverability and/or establish notional values of affordable units which reflect local housing market conditions, evidence should be provided of discussions with a number of Registered Providers (Not for Profit and demonstrating

a high standard of management). 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. If build costs need to be assessed, then developers will also need to pay for these to be reviewed by an independent Quantity Surveyor.

17.27 As evidenced by the LHNA the Council has a substantial need for affordable housing. As small sites which are not in employment use (less than 10 units and/or 1000sqm) aren't required to provide on-site affordable housing, this requires schemes above the threshold to deliver *the level of affordable housing as set out in Policy 11* ~~50%~~ to help achieve our target. Therefore, payments in lieu will be strongly resisted where the policy requirement is for on-site provision. The Council only has a finite number of deliverable sites due to the various constraints in the borough. Offsite delivery or a payment in lieu would mean an opportunity to deliver actual affordable housing would be missed. If in the extraordinary circumstance that off-site provision is acceptable, then the Council will expect that the affordable housing is maximised on both sites. The Council will only accept this arrangement if the total number of affordable habitable rooms over both sites equal 50% of the total number of habitable rooms.

17.28 Affordable housing will be secured on site by way of a legal agreement. To incentivise developers to build out their permissions in a timely manner, an early stage review will be inserted into all legal agreements securing affordable housing with a trigger date of 18 months after the date of the decision. The Council will ~~be~~ resist~~ing~~ any development which provides less than *a policy compliant offer of affordable housing on site, as per Policy 11* ~~50% affordable housing on site~~. If in the extraordinary circumstance that an application is approved providing less than 50% affordable housing *(unless the site qualifies for the Fast Track Route)*, an advanced stage review mechanism will be used to make sure that the scheme provides a policy compliant level ~~(50%)~~ of affordable housing if viability improves over the life cycle of the development. Review mechanisms in line with national policy guidance cannot be used to try and reduce the amount of affordable housing being provided.

17.29 The Council expects all new developments in the borough to be tenure blind. The schemes should be designed and managed so that all residents have equal access to the common areas, open space and not restricted on the use of the site based on the value of their home. The Council will strongly resist the use of gates which separate areas within a development. If this is required due to safety reasons, then evidence will need to be provided which shows all residents will have access to the gated area. Affordable Housing schemes should be designed with the same ethos and attention to detail as a market housing scheme. Policy 44 sets out the design process the Council expects developers to follow where it is open market housing or affordable housing.

Policy 12

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:

1. The accommodation is no longer needed.
2. The existing accommodation will be adequately re-provided to an equivalent or greater standard in a different way or elsewhere.
3. 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. A legal agreement will be necessary to secure the nature of provision, and any necessary future control in terms of eligibility and affordability for future occupiers. The following will be taken into account:

1. All residential uses are expected to contribute to the highest priority affordable housing needs as set out in Policy 11 'Affordable Housing (Strategic Policy) ', and contribute to creating mixed, balanced and inclusive communities. The highest priority is for on-site general needs affordable housing.
2. All residential uses should demonstrate how higher standards of accessible and inclusive design have been met.
3. Proposals which provide adaptations and alterations to enable residents to live independently and safely remaining in their existing property will be supported. Proposals for new specialist older persons' housing will be assessed against London Plan Policy H13, where it meets identified local need as set out in the Council's Local Housing Needs Assessment, housing and commissioning strategies, including how an affordable housing contribution has been maximised. Applicants for specialist older persons' housing should demonstrate how the design will address the needs of people with dementia and other long-term health conditions, and be informed by discussions with providers and demonstrate accordance with the Council's commissioning and housing strategies. An Operational Management Plan will be required to secure minimum levels of care and eligibility restrictions to prioritise local needs.
4. Proposals for supported housing will be supported where they have been designed to meet identified local needs and are in accordance with the Council's housing and commissioning strategies and London Plan Policy H12. Proposals should demonstrate how the design will address the level of support needed for future residents, and be informed by discussions with providers and demonstrate accordance with the Council's commissioning and housing strategies.
5. Proposals for custom, self-build and community-led housing will be supported where it can be demonstrated that the residential density of the site has been optimised and other policy requirements have been met, including those for affordable housing in accordance with Policy 11 'Affordable Housing (Strategic Policy) '.
6. Proposals for student accommodation to meet the needs of local institutions will be supported where the maximum level of accommodation is secured as affordable student accommodation in accordance with London Plan Policy H15.
7. Proposals for Build to Rent of any size will be assessed against London Plan Policy H11 including the need to secure affordable rented provision in perpetuity, along with mechanisms for long-term management.
8. Proposals for purpose-built shared living of any size will be assessed against London Plan Policy H16, which emphasises design, living conditions and the basis to secure tenancies. Proposals will need to address the need for a contribution to affordable housing.

C. The existing Traveller site at Priest Close and Chapter Way previously referred to as 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.

17.30 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.

17.31 The range of housing to meet specific community needs can include sheltered housing with care support, staffed hostels, residential care homes/nursing homes, almshouses, 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. This list is not exhaustive. These can be provided in all types of new housing development, change of use for wholly residential schemes, and mixed use sites incorporating residential use, where planning permission is required.

17.32 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. 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 relation to 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.

17.33 The Local Housing Needs Assessment is a boroughwide assessment providing updated evidence on housing need and detailing the need for different forms of specialist housing. Housing Learning and Improvement Network (LIN) have undertaken an assessment of need for specialised housing and accommodation for older people in Richmond.

17.34 The Richmond Housing and Homelessness Strategy 2021-26 sets out the Council's commitment to supporting the needs of vulnerable residents and how through partnership working there will be appropriate support so that people can access suitable housing. This includes ensuring that appropriate housing and support is available to enable older people and people with disabilities to maintain their independence. It recognises the need for accommodation pathways that meet the needs of people with learning disabilities and mental ill health, and ensuring that care leavers have access to appropriate housing that meets their need.

17.35 The Council has a role in commissioning, working with the market including developers and our other partners to ensure that sufficient and appropriate quality housing and support is available to enable residents to maintain independence, making a strategic shift from traditional residential and nursing care to more independent living and supporting people to live at home or in a home like setting wherever possible. The Council's Market Position Statement 2018/19 contained information on the adult social care and support market, setting out details on supply and demand, planned changes and emerging trends for services. This has been updated and supplementary information on the projected need for accommodation-based care is set out in the Richmond Accommodation-based Care Commissioning Statement 2022.

17.36 It is recognised that Richmond has an ageing population with increasing levels of disability and frailty. As set out in the LHNA, population growth is projected to be concentrated in older age groups (those aged 65 and over), with this age group being projected to increase by 50% from 2021 to 2039. There is a significant increase to 2039 in the projected over-75 population and the

increasing number of older people with dementia related needs. Although some households will seek to downsize, barriers can include financial inequalities, suitability of housing, and social factors, which form a complex picture and a cautious view should be taken about the willingness of households to move to smaller homes. The Housing LIN analysis sets out current anticipated likely need (prevalence rate) and the associated estimated need (units/bedspaces) for each type of specialised housing and accommodation for older people, but assumed that up to 50% of this estimated need could be met through the provision of mainstream housing. It may be possible through minor layout changes or improvements, or enabling works such as ground floor extensions, to enable people to stay in their own homes, or to take-up housing in new development built to higher inclusive access standards. This reduces the indicative London Plan benchmark to circa 75 units per year for specialist older persons housing.

17.37 Government guidance emphasises self-build or custom build to diversify the housing market and increase consumer choice. Since 2016 the Council has been required to keep and have regard to a register of people who are interested in a self-build or custom-build home in the borough. The Council has been granted an exemption by Government from the duty to permit enough serviced plots of land to meet the demand for self-build and custom housebuilding. The reason for this is the demand for self-build and custom housebuilding is greater than 20% of the land identified by the Council as being available for future housing. This calculation is run each year to see if the threshold is still exceeded and if so, the exemption remains.

17.38 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 LHNA does not identify any current need for additional student accommodation. The future strategy for St Mary's University proposes growth in student accommodation will be delivered through a combination of improvements and development on-site alongside the ongoing relationships with external partners.

17.39 The Private Rented Sector (PRS) can assist in meeting a range of needs and be particularly suitable for certain locations. The LHNA modelled the distribution of PRS dwellings in the borough at 24%. Purpose built schemes are referred to as ‘Build to Rent’ and it is recognised these are operated on a different model to build for sale. It can for example offer longer term tenancies/more certainty over long term availability and ensure effective management through single ownership. The London Plan sets out the affordable housing offer can be solely Discounted Market Rent at a genuinely affordable rent secured in perpetuity. Wholly PRS proposals are unlikely to be supported where they do not contribute to the borough’s highest priority need for affordable housing.

17.40 Large-scale purpose-built shared living schemes, often called co-living, are a relatively new form of housing, which can provide a housing option for households who cannot or choose not to live in self-contained homes or HMOs; often targeted at transient younger, high skilled professional households and individuals. The LHNA did not identify a particular need for co-living in the borough, given the borough has a higher proportion of families and older persons. However, there is an opportunity for creating mixed communities in which some people with additional needs (e.g. learning disabilities or physical disabilities) live alongside others from the younger, high-skilled group who provide some support as a condition of their tenancy. This may be a way to secure supported housing on a larger site, to meet a range of needs within a development.

17.41 All proposals for the provision (or loss) of housing to meet specific community needs will be assessed having regard to the Council’s Housing and Homelessness Strategy, Commissioning evidence and

strategies including those for associated client group(s). This will be considered along with the advice of the Council in its housing and commissioning roles, including adult health and social care; the advice of Achieving for Children, where relevant; and the South West London Integrated Care System or any other relevant NHS or health body. Proposals for the development of any specialist housing should demonstrate that there is a local need for such accommodation. Given the scarcity of land, there may be additional benefits that can be recognised where it can be demonstrated proposals will provide pathways through different types of needs that may provide wider opportunities, such as to step down a level of care and support or for transitional move-on accommodation, or enabling in-borough provision.

17.42 Provision is encouraged in accessible locations and integrated within communities, particularly to ensure that provision supports access to existing personal and community networks and can reduce the need for formal care and support. High quality design standards will be required, relevant to client needs and their expected behaviours, including inclusive design and provision of internal and external space. For example, older people's accommodation should address specific needs such as storage of electric buggies in dry locations, increasing wheelchair housing and turning circles for day centre buses. For example, any proposed shared living must provide adequate space to address inclusive access - designing co-living to ADM Volume 2/BS 8300 and taking note of some aspects of ADM Volume 1 M4(3) for the wheelchair adaptable/accessible rooms. The Council's Specialist Housing Occupational Therapist may be able to offer guidance at an early stage to ensure inclusive access is maximised in any housing to meet the needs of different groups. To assist the delivery of supported housing, the Council's informal Specification: Supported Housing Accommodation; as referred to in the supporting text to Policy 13, sets out expectations and requirements for all types of supported housing development for different people groups. The Mayor of London has published a Practice Note on Wheelchair Accessible and Adaptable Student Accommodation (2022).

17.43 Innovative modern methods of construction, such as modular housing partly constructed off-site, are also encouraged where it can assist housing delivery in terms of construction and sustainability. To innovatively address future supported housing needs, the use of flexible layouts and adaptable space that can make use of digital technology and could be altered to meet different needs over time is encouraged. For example there could be flexibility whether providing support for mental health or people with learning disabilities, providing the design allows for the complexity of needs and the care and support that will be needed, and the potential impacts and infrastructure needs can be assessed. There are opportunities for inter-generational and integrated developments, as suggested in paragraph 17.40 above. The Council's housing and commissioning officers should be involved in discussions with providers, at an early stage, to ensure proposals will meet local identified supported housing needs, and evidence of these discussions submitted with an application. Applications are expected to be submitted with details of how the design and management will provide the necessary level of supervision, management, care and support, including in Operational Management Plans (including minimum levels of care). A cascade will be sought to ensure the units will be first offered to eligible persons residing within the borough, for example for a minimum period of 3 or 6 months.

17.44 The Council's identified priorities for new specialist housing development, at the time of writing, include:

- Extra care and supported living provision including developing more specialist provision for service users with complex, high-level needs and challenging behaviour, and accommodation options for move-on pathway;
- Innovative and sustainable dementia friendly accommodation;

- Specialist ‘core and cluster’ schemes of self-contained flats with 24 hours staffing and communal areas for adults with a learning disability;
- Ensuite scheme with high support for adults with mental health needs, including to assist with moving towards independent living;
- Specialist supported housing for adults with physical and sensory needs;
- Supported housing of trainee flats for care leavers to act as a pathway into permanent tenancies;
- Remodelling of older peoples sheltered accommodation for modernisation or replacement to provide self contained units.

17.45 However, as identified in the LHNA, 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 as set out in Policy 11 Affordable Housing will be applicable to all site proposals for accommodation considered under this policy and it is expected that schemes will be designed to accommodate the priority needs for affordable housing alongside other types of housing for specific groups. As set out In Policy 11 Affordable Housing the threshold approach to fast track applications providing lower levels of affordable provision in proposals to meet the needs of different groups, such as affordable student accommodation or specialist older persons housing, is not considered appropriate in the borough context given the significant land constraints and high level of general affordable housing need.

17.46 The Council's research on Gypsies and Travellers in 2013 and 2015 (report published in 2016) suggested 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. The Council’s research has been updated with new surveys in 2022, and the overall position remains similar, even taking into account some recent unauthorised encampments. The London Plan also sets out in the supporting text to Policy H14 that the Mayor will initiate and lead a London-wide gypsy and traveller accommodation needs assessment, with a report due to be published in 202~~3~~5, and will work to support boroughs in finding ways to make provision for gypsy and traveller accommodation.

Policy 13

Housing Mix and Standards

A. Development should generally provide a mix of sizes and types of accommodation. Areas within PTALs 3-6 or within 800m distance of a station or town centre boundary should provide a higher proportion of small units (studios and 1 beds). For market housing, there is highest demand for 2 and 3 beds. The affordable housing mix should be based on discussions with a Registered Provider(s) to reflect local needs, in accordance with Policy 11 'Affordable Housing (Strategic Policy) '. The housing mix should be appropriate to the site-specifics of the location.

B. All new housing development, including conversions, are required to comply with the Nationally Described Space Standard. As also set out in London Plan Policy D6 on private internal space, the minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling. New homes significantly above the minimum standard that do not make efficient use of land will be resisted.

C. All new housing development, including conversions, should provide adequate external space. Purpose built, well designed and positioned balconies or terraces are encouraged where new residential units are on upper floors, if they comply with Policy 46 'Amenity and Living Conditions '. Regard should be had to the Council’s Residential Development Standards SPD as appropriate.

D. Amenity space for all new dwellings, including conversions, should be:

1. private, usable, functional and safe;
2. easily accessible from living areas;
3. orientated to take account of need for sunlight and shading;
4. of a sufficient size to meet the needs of the likely number of occupiers; and
5. accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space.

E. At least 10% of all new build housing (via works to which Approved Document M (ADM) Volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings' and all other new build housing (created via works to which Part M volume 1 of the Building Regulations applies) is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings', in accordance with London Plan Policy D7. Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement as set out in London Plan Policy D5 to demonstrate how the highest standards of accessible and inclusive design have been achieved.

17.47 The Local Housing Needs Assessment analysis considers demographic trends and a scenario to understand the potential population growth associated with the delivery of 411 homes per annum. The boroughwide assessment suggests an appropriate mix for affordable and market homes, taking account of household changes and the ageing population. However, a range of factors influence demand, as well as the mix that will be considered appropriate based on a site-specific assessment. Regard should be had to the nature of the site and character of the area, up-to-date evidence of need, as well as the existing mix and turnover of properties at the local level. A mix is expected to accommodate the needs of both young and old people, including options for downsizing. The appropriate mix for affordable housing should be based on meaningful discussions with a Registered Provider(s) as required by Policy 11 Affordable Housing to inform tenure and size of units, recognising there may be scope to provide smaller units to create a chain of moves which can free up large under occupied affordable homes.

17.48 Housing standards for internal and external space and inclusive access apply to all tenures.

17.49 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. The pandemic has further highlighted the importance of having access to outdoor and indoor space, particularly with the potential for future working patterns in some sectors to retain a high proportion of home working.

17.50 The Council has therefore adopted the Nationally Described Space Standard and the optional higher Building Regulations Part M for inclusive access. The Government has since April 2021 required all new homes created through permitted development rights to comply with the Nationally Described Space Standard.

17.51 The space standards are minimum requirements which applicants are encouraged to exceed. Although as set out in London Plan paragraph 3.6.2 and of particular relevance in the borough due to limited land supply, dwellings with floor areas significantly above the Nationally Described Space Standard will be resisted - due to the level of housing need and the need to make

efficient use of land. If oversized units are proposed, their impact should be assessed assuming greater occupancy as to the potential infrastructure impacts.

17.52 The Nationally Described Space Standard sets a minimum ceiling height of 2.3 metres for at least 75% of the gross internal area of the dwelling. Following the approach set in the London Plan Policy D6 and paragraph 3.6.3 to address the impacts of the unique urban heat island effect and the fact that the majority of housing developments in London are made up of flats, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is required to ensure that new housing is of adequate quality, especially in terms of daylight penetration, ventilation and cooling, and sense of space. The risk of overheating is a particular concern. The provision of dual aspect dwellings should be maximised, in accordance with London Plan Policy D6 and paragraphs 3.6.4 and 3.6.5.

17.53 Private outside space is desirable in all circumstances. For external amenity space, London Plan Policy D6 states a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5 metres. Proposals should demonstrate their capability, to accommodate furniture, access and activities, based on the number of future occupants.

17.54 Unlike the other standards in this policy, part E should apply to all dwellings created via works to which Approved Document M (ADM) Volume 1 applies which at the time of writing generally limits the application to new build dwellings. The London Plan supporting text to Policy D7 sets out guidance including for shared approach routes, application to all tenures, step-free access into dwellings and where there may be flexibility around provision of a lift to all dwelling entrances. There may be the opportunity even where step-free access is not possible, for dwellings at entrance level to meet other requirements for M4(2) and M4(3) to maximise inclusive access. It is acknowledged that homes to M4(3) may need larger floorspace elements than the minimum standard, to deliver compliant wheelchair adaptable / accessible homes.

17.55 Guidance should be sought from the Council's Specialist Housing Occupational Therapist at an early stage in designing wheelchair accessible dwellings and guidance can be provided on meeting requirements (an informal Accessible and Inclusive Housing overview note and guidance applicable to a site proposal is available, which has been approved by the Council). The Council will negotiate through site-specific discussions the most effective way to maximise provision for wheelchair use in affordable housing. This will include having regard to identified local needs through waiting lists of those needing wheelchair accessible accommodation in the borough through the Richmond housing register, which has a separate queue for people seeking specially designed or adapted property (mainly for wheelchair users) suitable for persons with physical disabilities. All new build housing to M4(3) that is affordable housing to which the Council has nomination rights must be built out as fully wheelchair 'accessible' i.e. a home readily useable by a wheelchair user at the point of completion. All new build housing to M4(3) that is for shared ownership or market housing must be easily 'adaptable' to wheelchair housing. The Council's informal Specification: Supported Housing Accommodation sets out expectations and requirements for all types of supported housing development for different people groups, as relevant to proposals considered against Policy 12.

17.56 The Government announced in 2022 they will mandate the M4 (2) requirement in Building Regulations as a minimum standard for all new homes and M4 (1) will apply by exception only where M4 (2) is impractical and unachievable, as part of their commitment to raising accessibility standards for new homes. However, this is subject to a further consultation on the draft technical details and will be implemented with a future change to Building Regulations.

17.57 Guidance in the London Plan details what should be contained in the inclusive design statement included as part of the

Design and Access Statement. These should be proportionate to the scale and type of development.

17.58 Where developments are not able to meet relevant 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 46 Amenity and Living Conditions which also considers the impact on existing occupants) have been considered and incorporated wherever possible.

17.59 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.

17.60 The Housing Design Standards London Plan Guidance ~~being prepared by the Mayor~~ (~~consultation draft February 2022~~ *June 2023*) provides guidance on housing design standards for use when designing or assessing new housing. The Council will consider an update to the Residential Development Standards SPD.

Policy 14

Loss of Housing

A. Existing housing should be retained. The net loss of existing affordable housing units – overall and in terms of social rented housing – will be resisted. Existing larger houses in multiple accommodation (HMOs) will be protected where they are of a reasonable standard. Loss of hostels, staff accommodation, and shared and supported accommodation that meet an identified housing need should be satisfactorily re-provided to an equivalent or better standard. A change of use from housing to short-stay holiday rental accommodation to be used for more than 90 days a year will be resisted.

B. Proposals for reversions and conversions should assess the suitability of the property, environmental and design considerations. Proposals should avoid a detrimental impact on existing housing supply.

C. 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 (considering embodied carbon and the circular economy); and, if this is the case
2. In accordance with London Plan Policy H8, existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace;
3. the proposal will result in demonstrable environmental, transport or parking benefits;
4. the proposal does not have an adverse impact on local character and streetscene, according with Policy 28 'Local Character and Design Quality (Strategic Policy)'; and
5. the proposal provides a satisfactory standard of accommodation, including accessible design, as set out in Policy 13 'Housing Mix and Standards '.

17.61 Existing housing is valued in the borough due to the constraints of limited land supply and high land values. The London Plan housing target for the Council will be challenging to achieve and any loss of existing units exacerbates this. To preserve the supply of housing need, any net loss of housing units will be resisted. The London Plan places an emphasis on optimising use of land, including at Policy H8 that any loss of existing housing should be replaced by new housing at existing or higher densities.

17.62 This policy is aimed at individual smaller sites, rather than large scale remodelling.

17.63 Houses in multiple occupation (HMOs) can provide a valued source of cheaper accommodation, particularly for young and transient groups in the population, who have not reached a stage where they can or want to buy, for people who are unable to gain access to other forms of housing and for people who would otherwise be homeless. HMOs can reduce pressure on other elements of the housing stock. Their quality can, however, give rise to concern. The Council maintain a register of licensed HMOs which need to comply with management regulations and local minimum amenity standards, although it is emphasised the Council's local Minimum Amenity Standards are not the ideal state and amenities should not be deliberately reduced to reach only the minimum standard. Where they are of a reasonable standard they should generally be protected, to accord with London Plan Policy H9. This applies to larger HMOs (for more than six people) which are defined as being a 'sui generis' use.

17.64 It is unlawful for homes in Greater London to be used as short-term holiday rented accommodation for a cumulative period of more than 90 days a year without seeking planning permission. The use of dwellings as short-term holiday rentals can have a detrimental impact on neighbours' residential amenity and community cohesion, especially when concentrated in a particular location. This use also reduces the supply of homes available for people to live in, and given the pressures on housing supply in the borough, the permanent loss of housing stock is therefore resisted.

17.65 There is a presumption for the applicant to first assess the potential for retaining and refurbishing existing buildings. This reflects the climate change emergency and the need to consider the whole life cycle of development, including the existing buildings embodied carbon, given the support for upgrading and reusing existing buildings as set out in Policy 4 Minimising Greenhouse gas emissions and promoting energy efficiency and Policy 28 Local Character and Design Quality. 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 Urban Design Study and the Council's Village Planning Guidance SPDs.

17.66 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. Given the housing needs and emphasis on optimising capacity on sites, proposals should generally not involve the net loss of more than one unit, due to the impact on housing supply.

17.67 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. Any proposals replacing existing affordable housing and for estate redevelopment will need to accord with Policy 11 Affordable Housing and London Plan Policy H8.

17.68 Reversions of houses converted into flats back into a single-family dwelling house will only be considered acceptable if the property was originally built as a single-family dwelling house, and it can be demonstrated the loss of a unit will be outweighed by environmental, streetscene, 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. Reversions should not involve the combining of more than two units due to the borough's housing needs. A stronger justification for an exception needs to be made if there is a greater loss of

existing units, given reversions will be generally resisted due to the loss of existing stock.

17.69 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:

1. the size of the property and its physical characteristics, including layout and size of rooms;
2. on-street parking conditions and on-street parking restrictions; the adequacy of public transport and access to local services and facilities to accord with Policy 1 Living Locally;
3. 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;
4. the location of the property and the need to have regard to the character of existing residential areas, including that of specific roads, as identified in the Urban Design Study and the Council's Village Planning Guidance SPDs, to accord with Policy 28 Local Character and design quality;
5. the effect on the amenities of adjoining premises;
6. the extent to which the property contributes to meeting specific community needs in accordance with Policy 12 Housing Needs of Different Groups.

17.70 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:

1. number of units in relation to size of property and layout in accordance with Policy 13 Housing Mix and Standards;
2. level of daylighting and sunlight and avoidance of overlooking in accordance with Policy 46 Amenity and Living Conditions;
3. 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 13 in Housing Mix and Standards;
4. access to private amenity space in accordance with Policy 13 Housing Mix and Standards.

Policy 15

Infill and Backland Development

A. Proposals are expected to optimise the potential for housing delivery on all suitable and available brownfield sites in accordance with London Plan Policy H1. This includes:

1. sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a tube/rail station or town centre boundary (referred to as Areas for Intensification);
2. mixed-use redevelopment of car parks and low-density retail parks and supermarkets, provided any net loss of parking is assessed in accordance with Policy 47 'Sustainable Travel Choices (Strategic Policy)' and Policy 48 'Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management';

3. housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses, subject to the reprovision of the non-residential uses if required in accordance with other Plan policies;
4. the redevelopment of surplus utilities and public sector owned sites, subject to conformity with other Plan policies;
5. small sites, in accordance with Policy 16 'Small Sites';
6. enabling residential on former employment sites only to enable employment-led intensification, as required by policies in the section on ‘Increasing jobs and helping businesses to grow’

B. Policy 28 'Local Character and Design Quality (Strategic Policy)' and Policy 44 'Design Process' require all proposals to follow a character- and design-led approach to site optimisation. 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 28 'Local Character and Design Quality (Strategic Policy)';
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 28 'Local Character and Design Quality (Strategic Policy)';
7. Retain or re-provide features important to character, appearance or wildlife, in accordance with Policy 42 'Trees, Woodland and Landscape';
8. Result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens, in accordance with Policy 46 'Amenity and Living Conditions ';
9. Provide adequate servicing, recycling and refuse storage as well as cycle parking;
10. Result in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.
11. Result in no significant loss of garden land, unless in some cases a well-designed backgarden development at an intimate scale with appropriate mitigation such as to improve biodiversity, accords with all the factors above and there is no identified harm to the local area.

17.71 Infill development is considered as sites within street frontages including the development of a gap in an otherwise built-up frontage. This policy could apply to a separate unit or units or an extension to an existing unit or outbuildings, including upward extensions, and could include side garden plots. Each site will be assessed as to whether it is considered suitable for development.

17.72 The London Plan expects a fundamental transformation in how new homes are delivered. Infill sites may be small-scale. Further details are set out under Policy 16 Small Sites, in support of London Plan Policy H2 on Small Sites which expects boroughs to pro-actively support new homes on small sites, and the specific nature of proposals on small sites. The London Plan expects incremental intensification to play an important role in contribution towards the housing targets for small sites, and the Areas for Intensification are mapped under that policy.

17.73 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.

17.74 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.

17.75 Character is also determined by materials and architectural details and these should reflect existing materials and predominant styles, in accordance with Policy 28 Local Character and Design Quality; the Design Quality SPD; Conservation Area Appraisals; the Urban Design Study; and the Council's Village Planning Guidance SPDs. As noted in the supporting text to Policy 11, modern methods of construction can assist in housing delivery, particularly off-site modular construction for smaller or awkward sites, provided it achieves the same high-quality design and standards.

17.76 The London Plan Guidance being prepared by the Mayor includes a number of documents that provide guidance on ensuring land is used in the best way to deliver the right quantity of new housing, at the right quality, in the right place, embedding high-quality design at the centre of housing delivery, including 'Optimising site capacity: A design-led approach' (consultation draft February 2022) and 'Small Site Design Codes' (consultation draft February 2022).

17.77 Land in built-up areas such as private residential gardens, parks and allotments are excluded from the definition of previously developed land in the NPPF and the London Plan. Most backland development in the borough involves loss of garden land. The NPPF recognises Plans should consider the case for setting policies to resist inappropriate development of residential gardens; and that the desirability of maintaining an area's prevailing character and setting (including residential gardens) forms part of the consideration of making efficient use of land. There are direct and indirect values of gardens associated with 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.

17.78 In the borough, residential gardens are particularly valued as part of an area's prevailing character and setting, and for the ecological, climate change and general amenity value, and are therefore protected. 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, and that the integrity of habitats should not be harmed as set out in Policy 35 Biodiversity and Geodiversity. Gardens are important in establishing the character of certain parts of the borough and this is recognised in the Urban Design Study, as elements of townscape that are valued or where their decline is a negative quality for example where front gardens are paved over. They are also recognised in the Design Quality SPD, in various Conservation Area Appraisals, and the Council's Village Planning Guidance SPDs. Policy 42 Trees, Woodlands and Landscape' recognises the value of trees in the borough, including for example for wildlife habitats and providing shading. They also contribute to reducing surface water run-off. Some of these qualities may be measurable, some may not be perceived by the visual appearance and upkeep of a site. There could be an opportunity through mitigation to avoid a net loss of garden land and consider whether the proposal brings a net gain in housing units. Overall 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. This is particularly the case while the Council has an identified future housing land supply, as housing delivery from backgarden development is not needed to meet the borough's housing target.

Policy 16

Small Sites

A. The Council will support the delivery of the small sites target of 234 new homes per annum in accordance with London Plan Policy H2.

B. In accordance with the London Plan, intensification is encouraged on small sites with good public transport accessibility (PTAL 3-6) and on sites within 800m of a tube, rail station or Major or District town centre boundary (as defined in the London Plan). Outside of these locations, development will be considered provided no unacceptable impact(s) identified against other policies in this Plan.

C. Proposals for small sites will need to have regard to the existing townscape character, as set out in the Urban Design Study, with proposals reflecting the building typology and demonstrating how they accord with the broad strategy for planning and management set out in the design guidance for each character area.

D. The Council will support proposals for well-designed new homes on small sites (up to 0.25 hectares) to meet local needs, in accordance with environmental, transport, parking and other relevant policies, see Policy 15 'Infill and Backland Development'. Proposals on small sites are expected to:

1. Demonstrate a character- and design-led approach by setting out how the proposed development takes into account the existing context, assessing the site and surrounds for the sensitivity to change, and ensuring that design elements reflect the small sites and relevant character area design guidance in the Urban Design Study and accord with Policy 28 'Local Character and Design Quality (Strategic Policy)'. In particular:

    a. in areas where the strategy is to ‘conserve’, proposals should clearly address how they will reflect and where appropriate, enhance existing character features through positive change;
    b. in areas where the strategy is to ‘enhance’, proposals should clearly address how they will contribute to restoring the existing character;
    c. in areas where the strategy is to ‘improve’, proposals should demonstrate how they will improve the character of the area including any new features which supplement and support the existing essential character of the area; and/or
    d. in areas where the strategy is to ‘transform’, proposals should demonstrate how they will remove detracting features and add new elements to change the character.

2. Provide high quality living environments with good levels of daylight, sunlight and privacy without adversely impacting on amenity of adjoining residential occupiers.
3. Ensure a sensitive integration into the existing streetscene, respecting the proportions and spaces of and between existing buildings that are characteristic of the locality.
4. Demonstrate how the impact on existing infrastructure, such as transport, health and education, has been taken into account.
5. Result in no net loss of existing biodiversity or significant loss of open space or garden land.
6. Ensure the design, layout and materials respect and respond to the historic environment and any relevant heritage assets, responding positively to the local character as identified in the Urban Design Study and Conservation Area Appraisals/Statements.
7. Ensure the scale, height, massing, density, proportions, form, materials and detailing are appropriate to the site and its context, while also exploring opportunities for extensions including additional floors, if in accordance with Policy 28 'Local Character and Design Quality (Strategic Policy)' and the design guidance in the Urban Design Study.

Policies Map designations

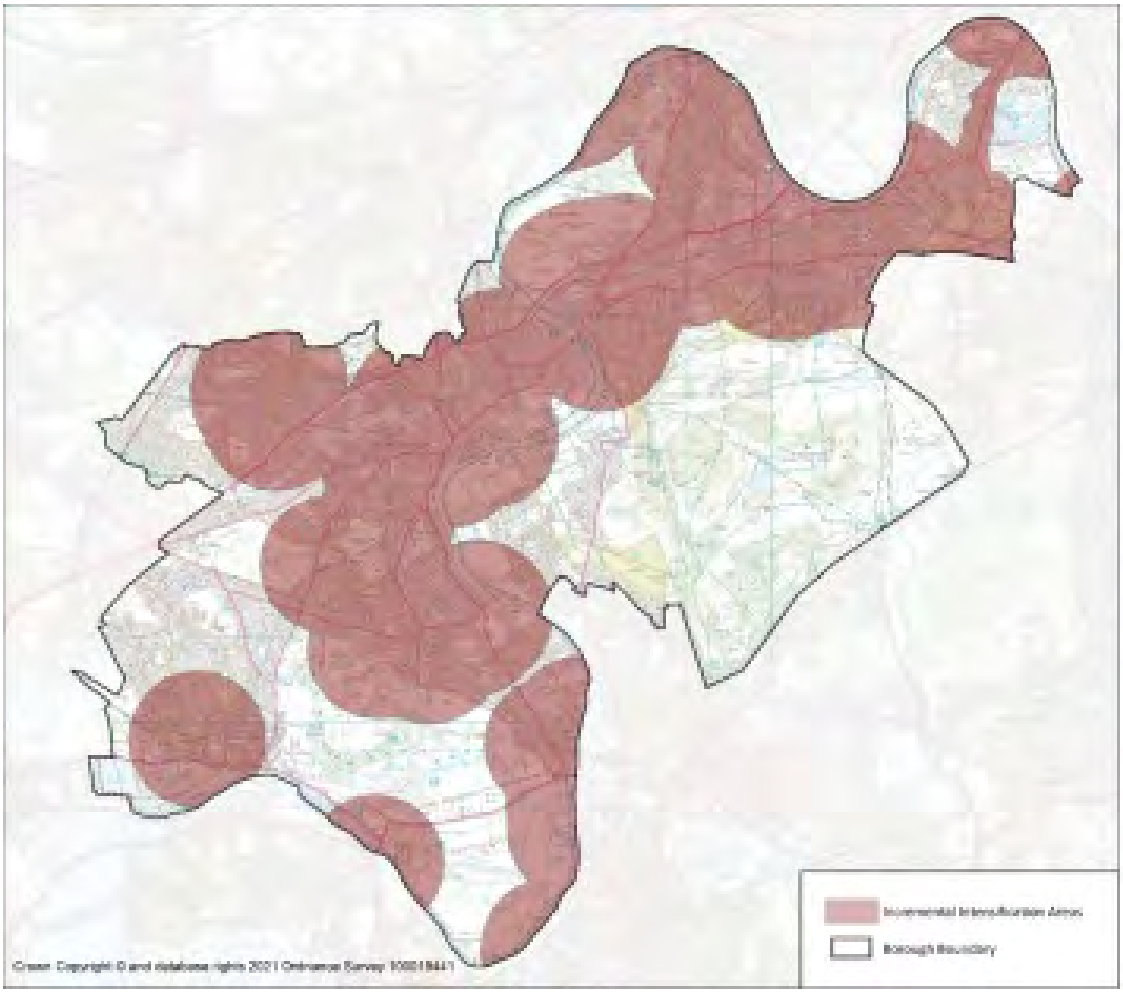
Areas for incremental intensification (as set out in the London Plan) have been added to the Policies Map Key with an advisory to check with the Council for the latest mapping information. This is to articulate the spatial extent of the area where intensification is encouraged. It may be updated by changes to public transport accessibility, any changes to tube or rail stations (if planned) or to the boundaries of Major or District town centres (which could include changes close to the borough boundary). See map below.

17.79 Small sites for residential development are often the most difficult type of residential development to deliver, with fragmented land ownership and high levels of owner occupation in existing residential areas in the borough. There are often concerns raised by existing local communities regarding the impact of new development, such as the detrimental impact on character and amenity and the cumulative impacts on local infrastructure, such as transport, health, education and other community facilities.

17.80 However, the London Plan sets a strategic priority to increase the rate of housing delivery from small sites, particularly in Outer London. It sets small sites targets for each borough, as a component of the overall housing target, based on trends in housing completions on sites of this size and the estimated capacity for net additional housing supply from intensification in existing residential areas, taking into account PTAL, proximity to stations and town centres, and heritage constraints. For Richmond, it expects 2,340 net housing completions on small sites (below 0.25 hectares in size) over the 10 year period from 2019/20 to 2028/29.

17.81 The supply of large sites fluctuates and in some years completions from large sites have fallen as low as 7%, while in other years have risen to 70%. Average net completions on small sites 2013/14 to 2021/22 have already been averaging 156 homes per annum. The relative contribution from large and small sites in each borough may fluctuate across the target period, as recognised in the London Plan. The London Plan supports boroughs in using windfall assumptions in their five-year housing trajectories based on the small sites targets because, in contrast with recent annual trends on small sites, the figures are considered to better reflect a minimum baseline for housing delivery given the new policy focus on developing small sites for housing in the London Plan and the package of measures outlined in the London Housing Strategy. It is therefore considered appropriate to include a windfall of 234 homes per annum from years three to five in the five year housing land supply.

17.82 The London Plan expects incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station (tube or rail in the borough or close to the boundary) or town centre boundary (district and major centres in the borough or those close to the boundary), to play an important role in contributing towards the housing targets for small sites. This currently covers approximately 54% of the borough (see Map 17.1 below). Within these areas incremental intensification is actively encouraged; beyond these areas proposals may still be found acceptable provided no unacceptable impact(s) are identified when assessed against policies in this Plan. This type of intensification can take a number of forms, such as: new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision.



17.83 The London Plan expects this Plan to recognise that local character evolves over time. Small sites provide the opportunity for communities to grow organically while maintaining their original character or evolving it incrementally based on a consensual approach. The Council's Urban Design Study has assessed capacity for growth across the borough, considering the sensitivity to change and simultaneously the probability of change, to understand the potential development capacity of individual character areas across the borough to both tall and mid-rise buildings and small sites. The UDS provides design guidance for small site developments concerning the context, massing, materials, heritage, frontage, and detailing. This is alongside specific design guidance for each character area, which sets out the relevant strategy, an analysis of existing features and where there are opportunities to improve character. In the borough context, as outlined in the section 'Protecting what is special and improving our areas', with large parts of the borough sensitive to change, it is vital that small scale development is sympathetic to the area's valued features and heritage assets. It is critical that development in existing communities on smaller, constrained sites near to existing dwellings is the product of careful design, applying the character- and design-led principles, which adds value.

17.84 The Council will consider producing further supplementary planning document(s) or toolkits to inform small site design expectations on residential-led projects, along with updates to the Design Quality SPD (2006) and Small and Medium Housing Sites SPD (2006). The London Plan Guidance on 'Optimising site capacity: A design-led approach' (consultation draft February 2022) and 'Small Site Design Codes' (consultation draft February 2022) are to support well-designed new housing on small sites. The guidance recognises the common small housing development types of street-facing and backland conditions associated with

terraces and semi-detached houses, which produce different design challenges and opportunities.

17.85 All small sites are expected to make a contribution to affordable housing, in line with Policy 11 Affordable housing.

18 Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic

Definitions for this section / theme of the Plan

'Centres' taken to include all tiers in the centre hierarchy.

Retail is defined as the following for the purposes of policies in this section:

- Shops - Retail sale of goods other than hot food, including pet shops, retail warehouses and showrooms principally to visiting members of the public.
- Retail services -
    - Post Office
    - Hairdresser/barber
    - Travel and ticket agencies
    - Funeral director
    - Dry cleaner
    - Opticians/optometrists
    - Domestic hire shop (hiring out of domestic or personal goods or articles)
    - Sandwich shop (sale of sandwiches or other cold food for consumption off the premises)

Essential shops and services are defined as the following (including those in multiple uses where a significant proportion of floorspace is selling the relevant goods):

Essential shops are defined as:

- Post Office,
- Baker,
- Butcher,
- Newsagent,
- Fishmonger,
- Greengrocer,
- Off licence,

- Chemist,
- Supermarket/general store/delicatessen/health food shop.

Essential services are:

- Hairdresser & barber and other businesses delivering in-person health and beauty services such as nail salons, beauty and tanning salons.
- Bank/building society (not stand alone ATMs not part of a bank/building society)
- Launderettes and dry cleaners
- Other services which are not usually delivered on-line which require an in-person visit including for example, a funeral director, tailor, shoe repairer, MOT centre, car & tyre servicing.

Please note that proposals for change of use from other uses such as social infrastructure uses including provision of health or medical facilities and indoor sport, educational uses and employment uses would be considered under other plan policies.

Policy 17

Supporting our Centres and Promoting Culture (Strategic Policy)

A. The Council will support shopping, leisure and culture uses, providing spaces for businesses and services and promoting community and cultural exchange which contributes to the vitality and viability of our centres, helping to diversify their offer and facilitate adaption to meet changing needs. Development proposals will be supported which:

1. Reflect the centre's role and function within the centre hierarchy and is of a scale appropriate to the size of the centre.
2. Comply with the sequential test set out in the NPPF. Major new development for retail, leisure and business uses is directed to the five designated town centres as set out in Policy 18 'Development in Centres'. New retail development is encouraged to locate within the designated Primary Shopping Areas where defined, in line with Policy 18, or within a Site Allocation which specifies retail, meeting any requirements of that Site Allocation including in terms of scale of retail and complying with other Local Plan policies.
3. Resist the loss of retail floorspace in Primary Shopping Areas.
4. Resist the loss of essential shops and services (as defined above in accordance with Policy 20 'Shops and Services Serving Essential Needs').
5. Support diversification and repurposing of high streets and centres to contribute towards retail, leisure, business, educational, healthcare, community and cultural floorspace, and to encourage hubs with clusters of uses that support the centre hierarchy to become key meeting places and provide opportunities for linked trips, at different times of the day and night, in accordance with Policy 1 'Living Locally and the 20-minute neighbourhood (Strategic Policy)';
6. Maintain existing commercial uses in our centres, including space that can be repurposed and is flexible and can be adapted to reflect modern needs. Uses that provide active frontages are required at ground floor level as set out in Policy 18 'Development in Centres'. Residential use will be supported on upper floors and/or to the rear, provided it does not compromise the ongoing use of existing commercial space;
7. Provide high quality environments which promote local distinctiveness with regard to the character of an individual centre, respecting heritage and townscape character. Enhance the public realm, including with the use of urban greening and mitigation to address climate change, to provide a sense of place and destination in our centres. Event spaces, temporary uses and proposals for 'meanwhile uses' of vacant spaces within the centre hierarchy will be supported

where it can be demonstrated that they can be appropriately managed and their impact on the streetscene does not give rise to adverse environmental impacts.

8. Enhance the connections between uses, improving legibility and wayfinding, and access to digital infrastructure. Provide opportunities for active travel, supporting the Healthy Streets Approach, in accordance with Policy 1 'Living Locally and the 20-minute neighbourhood (Strategic Policy)'; and
9. Enhance the Cultural Quarters in Richmond and Twickenham Town Centres and other existing cultural clusters in smaller centres and can demonstrate suitable management of adverse impacts arising from their proposals.

Policies Map designations

Updated town centre boundaries will be displayed on the Policies Map. Local Centre Boundaries are defined for local centres, neighbourhood centres and Important Local Parades as shown in Appendix 1 and will be displayed on the Policies Map. Both delineate centres in the hierarchy.

The Twickenham Area Action Plan boundary will be removed from the Policies Map.

The centre hierarchy

18.1 The centre hierarchy is shown below:

Table 18.1 The Centre Hierarchy

Type of Centre	Name of Centre
Town Centres	Richmond Twickenham Teddington East Sheen Whitton
Local Centres	Barnes (High Street & Church Road) East Twickenham Hampton Hill Hampton Village Ham Parade Kew Gardens St Margarets

Type of Centre	Name of Centre
Neighbourhood Centres	Castelnau Friars Stile Road Hampton Wick Heathside (Powder Mill Lane) Sheen Road Kingston Road (Teddington) Stanley Road (Teddington) Twickenham Green White Hart Lane (Barnes/Mortlake)
Important Local Parades	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 (parade to the north of A316) Sandycombe Road (Kew) Strawberry Hill Waldegrave Road Whitton Road

The five town centres

18.2 The borough's five ~~main~~ *town* 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.

18.3 The policy develops the approach set out in the overall Spatial Strategy of this Plan by steering major development into the five town centres. Richmond town centre in particular is where the majority of commercial development is expected to be focused.

Local and neighbourhood centres and Important Local Parades

18.4 There are seven local centres (Barnes, East Twickenham, Hampton Hill, Hampton Village, Ham Parade, Kew Gardens and St Margarets), nine neighbourhood centres (Castelnau, Friars Stile Road, Hampton Wick, Heathside (Powder Mill Lane), Sheen Road, Kingston Road, Stanley Road, Twickenham Green and White Hart Lane) and 14 Important Local Parades that provide local services. All are defined with a local centre boundary.

18.5 Local and neighbourhood centres as well as Important Local Parades provide a focus for local communities and opportunities to meet, shop, work, spend leisure time and access services. These have become more important for their contribution to enabling Living Locally, and in response to the COVID-19 pandemic have often thrived as residents rediscovered their local areas. This trend is partly due to their higher proportion of independent, locally based businesses, benefitting from increased numbers of people working from home and from everyone being restricted in their movements during lockdowns. 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 which are convenient and

result in a reduced need to travel. They are easier to access through active travel with a short journey by walking or cycling. This trend also supports local business and retains spending in the local area, 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 so important for wellbeing.

18.6 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.

18.7 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 cultural and tourism potential or specialist shopping offer. The Council will seek to support businesses that are successful and expanding.

Adapting our high streets to future retail needs

18.8 Historically, evidence has identified a need for modest additional retail floorspace, driven primarily by the borough's rising population. Structural changes to the retail sector were already underway and will have been accelerated by the COVID-19 pandemic, including shifts in customer behaviour and growth in online shopping. However, a significant contraction in terms of commercial floorspace needs is not expected. The Richmond upon Thames Retail & Leisure Study (Phase 2) 2023 forecasts that up to 2034, there *is* an over-supply of 2,900 sqm gross of retail *(comparison and convenience)* floorspace, and an undersupply of food/beverage floorspace of approximately 5,400 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,500 sqm gross *(retail and food/beverage)*. *An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study, to test whether the forecasts were sound using the latest inputs where appropriate, following in particular the publication of updated national expenditure information. This reveals that the revised forecasts are similar to the Phase 2 Study: up to 2034, an over-supply of approximately 3,000 sqm gross of retail (comparison and convenience) floorspace is forecast, and an under-supply of food/beverage floorspace of approximately 5,500 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,400 sqm gross (retail and food/beverage).* Put simply, the need for shopping space is forecast to decrease but the need to provide space for the food & beverage sector and potentially the wider leisure sector is increasing.

18.9 Together with a borough-wide centre vacancy rate of ~~7.8~~*8.1*% in all frontages (Town Centre Land Use Retail Survey 202~~2~~*3*), the priority in the short to medium term will be the reoccupation of vacant shop units, potentially for non-retail uses including food/beverage outlets, leisure, entertainment and cultural uses. Based on a reasonable reduction in shop vacancy rates, reoccupied space could in theory accommodate most of the projected need.

18.10 The capacity projections suggest there is currently no pressing requirement to allocate sites for major retail development. Not all vacant units will be suitable for conversion to leisure/cultural uses, therefore new development may be required to accommodate some new uses. However, policies provide enough scope to respond to new investment that cannot be accommodated in vacant units. Some redevelopment, refurbishment and expansion may be required in addition to the reoccupation of vacant units, ideally within town centres to accommodate future investment opportunities.

18.11 The Local Plan no longer includes designated shopping frontages. Instead, Primary Shopping Areas have been defined in the town centres only. Policy also protects

specified essential shops and services which are crucial to facilitate Living Locally – a key theme of the Local Plan.

18.12 Even though the evidence base suggests there is a need to re-purpose vacant shops generally, it is also vital to ensure that the borough's Town Centres, which provide food shopping but also a range of comparison shops, continue to be viable and attractive in this role. Part of the formula for success for these larger centres is to ensure there is a sufficient quantum of comparison shopping floorspace in each town centre. Primary Shopping Areas (PSAs) have been defined, as required by paragraph ~~86~~ *90* of the NPPF, for the five town centres only. Resisting the loss of retail floorspace in PSAs supports these centres' comparison shopping role & fosters a compact retail core which makes browsing easier. New retail development is encouraged to locate within the PSA where one has been defined, in order to consolidate the retail offer within. However, it is recognised that the PSAs are tightly drawn and the Council will apply the sequential test when considering proposals, as set out in the NPPF.

18.13 Each centre in the hierarchy has been individually assessed in the Council's research report "Assessment of Borough Centres 2023". The report draws together research and data from numerous sources and took into account the views of the community, in order to review the centre hierarchy, assist in defining PSAs and review and designate new boundaries.

18.14 A Richmond Partnership Conference in 2021 and a series of virtual Community Conversations within each area of the borough, have supported the Council's approach to unlock the potential of our centres, as becoming destinations beyond shopping to attract and retain visitors, as people-centred places which are appealing to pedestrians, and by using digitalisation creatively. To adapt to meet future needs, it is vital that our centres capitalise on their locally distinctive features, such as the cultural and leisure offer and riverside settings, to provide a sense of place, as set out in relevant place-based strategy in section 5 of this Plan. In particular, Cultural Quarters and clusters are identified in Policy 18 'Development in Centres'. As well as the provision of goods, services and attractions, the public realm within our centres and connections between uses need to encourage people to dwell, with walkable environments. This can be achieved through increased greening, street furniture, public art, event and performance spaces including for temporary and meanwhile uses, as well as infrastructure for visitors such as public toilets and wayfinding. Spaces should be repurposed at different times to serve both the day and night-time economies. As set out in the place-based strategies in section 5 of this Plan, some of these other initiatives may be undertaken by partners that the Council works with to support our centres, including the current Business Improvement Districts and business associations.

New Permitted Development Rights

18.15 The Council made a non-immediate Article 4 Direction to remove permitted development rights for a change of use from Class E to residential, which was confirmed in June 2022. Subsequently, the Direction was modified by the Secretary of State and came into force on 29 July 2022. This covers the extent of the borough's designated centre hierarchy, identified for their contribution to the overall vitality and viability of our centres and recognising the importance of having access to local shops and services to enable Living Locally. It is the Council's intention to continue to enforce its Article 4 Direction to require development involving the loss of retail floorspace to seek planning permission.

Policy 18

Development in Centres

A. Development proposals for town centre, community, healthcare, educational and cultural uses will be supported in the borough's designated centres as delineated by town centre and local centre boundaries where they:

1. are in keeping with the centre's role and function within the hierarchy and are of a scale appropriate to the size of the centre, in line with Policy 2 'Spatial Strategy: Managing change in the borough (Strategic Policy)';
2. retain a ground floor commercial or community use, to maintain and promote the continuity of active frontages at ground floor and / or to provide a direct service to visiting members of the public;
3. incorporate a flexible design such that the site could respond to changing market demand and requirements to effectively accommodate appropriate alternative uses in the future, helping to enhance the long-term resilience of the centre;
4. provide unit(s) of a size and format to accommodate town centre uses that will be fit for purpose and viable in the long term, including being adequate in terms of: width of unit, layout, access to facilities for users and servicing;
5. optimise the potential of the site by contributing a suitable use or mix of uses that enhance the vitality and viability of the centre, particularly where this diversifies the centre's offer;
6. do not adversely impact on the vitality and viability of the centre in which the development is proposed, or another centre;
7. contribute towards employment floorspace, providing suitable provision for small businesses or flexible workspace, where required by policies in '***Increasing jobs and helping business to grow and bounceback following the pandemic***';
8. support the Cultural Quarters in Richmond and Twickenham town centres and other existing clusters of cultural facilities and creative industries in our centres, as supported by Policy 26 'Visitor Economy ';
9. would not result in an over-concentration of similar uses (such as betting shops, public houses, bars and take-aways) in any one area, where this would result in an adverse cumulative impact on the amenity of nearby users, including residents, in accordance with Policy 19 'Managing the Impacts of Development on Surroundings '; and
10. contribute to a safe, secure and inclusive environment.

B. In addition to meeting the criteria set out in Part A of this policy, development proposals for retail [(3)] uses will be supported where:

1. In Primary Shopping Areas (PSAs), which have been designated in Town Centres as shown on the Policies Map, the loss of retail floorspace will be resisted. New retail development is encouraged to locate within the PSA or within a Site Allocation which specifies retail, meeting any requirements of that Site Allocation including scale of retail and complying with other policies in this Plan:
2. the proposal is in accordance with Policy 20 'Shops and Services Serving Essential Needs' in relation to resisting the loss of defined essential shops and services;
3. the proposal retains or provides a shopfront, or where this is not possible, provides a 'shop-like' appearance, to avoid a detrimental visual impact and respect the heritage and character of

3 'Retail' is defined in the Definitions box at the beginning of the chapter.

the centre, in accordance with Policy 28 'Local Character and Design Quality (Strategic Policy)' and shopfronts guidance; and

4. the proposal integrates with and adds to the physical attractiveness of the area within which it is located, avoiding blank walls and façades.

C. Major development and/or developments which generate high levels of trips should be located within a town centre boundary *or Site Allocation meeting the requirements of Policy 17 A2*. Elsewhere development within the local centre boundary should serve as more localised provision, which may include opportunities for retail, recreation, and smaller-scale employment uses.

D. Residential uses will be permitted in centres as follows:

1. High density mixed-use development, including residential, will be supported in appropriate locations, as identified within Site Allocations and Policy 45 'Tall and Mid-Rise Building Zones ', subject to compliance with Policy 28 'Local Character and Design Quality (Strategic Policy)' and other policies in this Plan.
2. Conversion to residential of upper floors, the rear of ground floor occupied by a commercial or community use will be permitted, where this can be designed to provide a high level of residential amenity without compromising the existing or potential operation of uses on the ground floor.

E. Existing markets will be protected. New and extended markets will be supported where any negative impacts on the surrounding area (including the operational requirements of existing businesses in the vicinity) can be mitigated.

F. 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. The applicant will be expected to undertake marketing in line with the requirements set out in Appendix 2.

G. Outside of designated centres proposals should satisfy the Sequential Test as set out in national policy and guidance (including extensions to existing retail and leisure developments of more than 200 sqm gross). When assessing proposals for development outside of existing centres, applicants will comply with the requirements of national policy and guidance in relation to impact assessments. For retail and leisure developments, including extensions, of over 500 sqm gross, the Council will require an Impact Assessment. The scope of such assessments will need to be agreed with the Council before submitting a planning application. Applications that fail the sequential test and/or where the impact assessment (where required) demonstrates significant adverse impact will not be permitted.

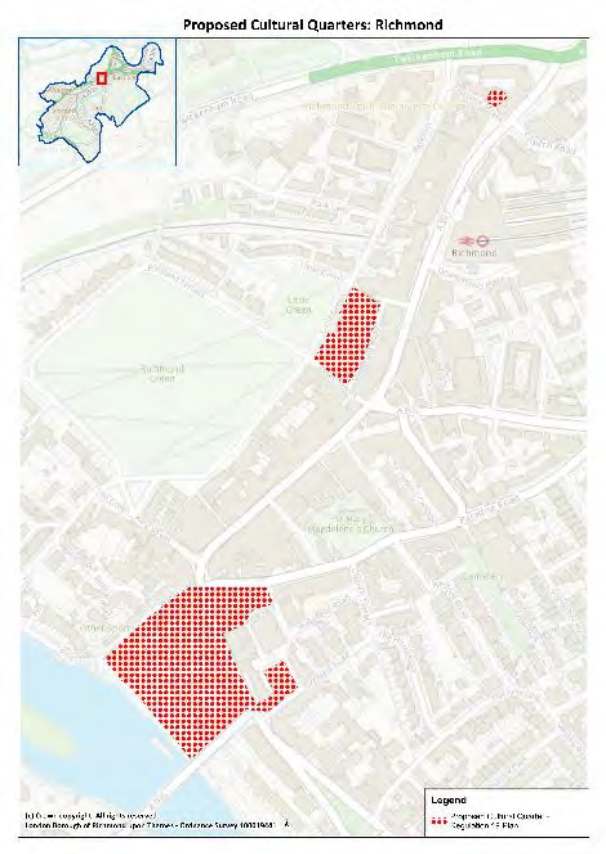
H. Where necessary and justified, the Council will use conditions and/or planning obligations to limit uses consented within Classes E, F1 or F2 in order to achieve the objectives of this policy and to avoid the proliferation of main town centre uses outside of town centres.

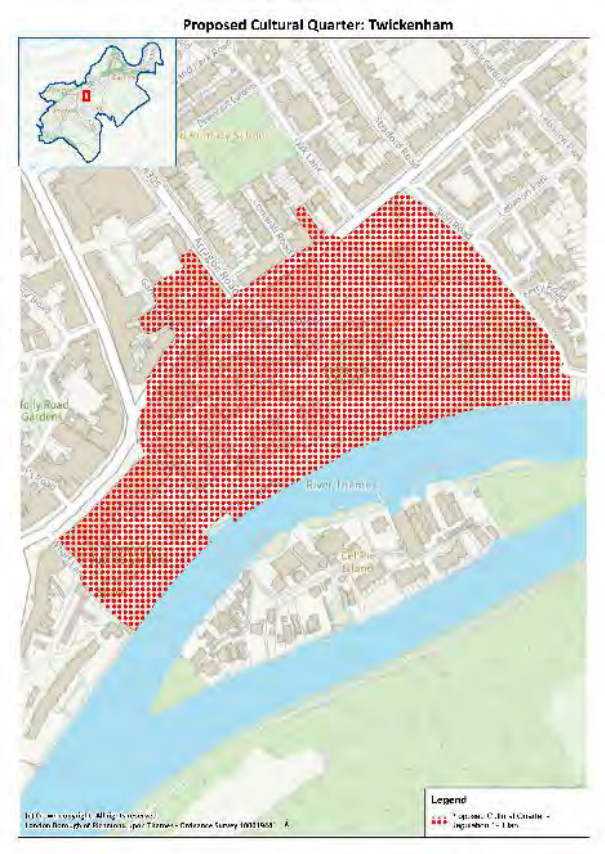
Policies Map designations

Primary Shopping Areas as shown in Appendix 1 will be shown on the Policies Map.

Cultural Quarters are shown on the Policies Map as follows:

- Richmond: the area focused on the reference and lending libraries, Museum of Richmond, Richmond Theatre, Orange Tree Theatre, Duke Street Church, with potential to link with uses in the town centre and along the Riverside.
- Twickenham: the area focused on the Civic Centre, York House and Gardens, the Mary Wallace Theatre, Twickenham Museum and Library, with potential to extend into the town centre and along the Riverside.





18.16 This policy builds on the approach set out in the spatial strategy, and accords with London Plan Policies SD6 and SD7, taking a town centre first approach. The types of development appropriate in the five town 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).

18.17 Focusing development in the town centres will result in sustainability benefits, including a reduction in the need to travel by car. Therefore, major commercial development should be located within the defined town centre boundaries (with the exception of retail uses which are encouraged to locate within Primary Shopping Areas).

18.18 Several centres are designated wholly or in part as Conservation Areas. The place-based strategies in section 5, and Policy 45 Tall and Mid-Rise Building Zones identify where there is potential for growth. The Site Allocations include the following sites within the town centres where there may be future opportunities to provide commercial, business

and service uses to serve the local community that enable the centres to grow and diversify:

- Richmond - Site Allocation 25: Richmond Station, Richmond, and Site Allocation 26: Former House of Fraser, 16 Paved Court 20 King Street 4 To 8 And 10 Paved Court And 75 - 81 George Street, Richmond.
- Twickenham - Site Allocation 15: Station Yard, Twickenham , Site Allocation 16: Twickenham Telephone Exchange, and Site Allocation 17: Twickenham Riverside and Water Lane/King Street.
- East Sheen - Site Allocation 37: Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen.
- Whitton - Site Allocation 20: Telephone Exchange, Ashdale Close, Whitton.
- Teddington - Site Allocation 6: Telephone Exchange, Teddington, Site Allocation 7: Teddington Delivery Office, Teddington, and Site Allocation 9: Teddington Police Station, Park Road, Teddington.

18.19 The local centre boundary delineates the smaller centres and parades in the hierarchy, which has been reviewed and is set out in full in Policy 17.

Adapting to change

18.20 To ensure their long-term stability, it is important that town centres and high streets can adapt to changing consumer demands and behaviours and the challenges posed by the growth in online retail.

18.21 There has been a long established policy approach of limiting the change of use away from retail. The Government introduced a significant change to the Use Classes Order in 2020, which combined several different town centre uses including shops, cafés and restaurants, offices, gyms and health centres into one use class- Class E (commercial, business and service) uses. There is a Class F for community and learning uses. Permission is not required to change between any of the uses within the new Class E. The introduction of Use Class E, in removing the distinction between retail and other non-retail commercial, business and services uses, makes the implementation of this approach challenging in practice; this policy will apply where planning permission is required for a change of use. Notwithstanding this, the Local Plan recognises the benefit of maintaining a concentrated retail core, and therefore has designated Primary Shopping Areas in the larger centres which are the preferred locations for shops on the ground floor of units, and where new retail development is encouraged to locate.

18.22 The NPPF states that, when assessing applications for retail and leisure development outside of town centres which are not in accordance with an up-to-date local plan, local planning authorities should require an impact assessment if the development is over a proportionate locally set threshold. Class E includes a broad range of uses, some of which could have significant detrimental impacts on town centres' vitality, vibrancy and viability. It is therefore necessary to require impact assessments to assess and mitigate potential impacts where appropriate. All retail and leisure developments over 500 sq.m gross (combined) proposed outside or on the edge of designated town, local and neighbourhood centres are required to prepare an impact assessment, including retail and leisure uses which are part of mixed use proposals.

18.23 Applicants will be expected to comply with the sequential test as set out in national and regional guidance. The NPPF states that a sequential test should be applied to planning applications for main town centre uses which are not in an existing centre nor in accordance with an up-to-date plan. In line with the glossary in the NPPF, Important Local Parades in the centre hierarchy are not considered as a centre in relation to the application of this test. For clarity, extensions for retail and leisure developments (which includes mezzanine floors) of more than 200m2 gross should also comply with the test. The locally-set thresholds relating to the impact and sequential tests set out in the policy reflect the type of generally small scale retail applications that come forward in the borough. Sequential test and impact assessments will need to be proportionate to

the scale of the development proposed. Compliance with the sequential and impact tests does not guarantee that permission will be granted; all material considerations, and compliance with the other policies within the development plan, will need to be considered in reaching a decision.

18.24 Where necessary and justified, the Council will use conditions and/or planning obligations to limit uses consented within Class E in order to achieve the objectives of this policy, to meet the scale and type of development needed and maintain the function of the centres, in line with the NPPF and PPG,to ensure the vitality of our town centres.

18.25 The Council's policy approach builds on the Use Class changes to enable flexibility within the centres, recognising the need to re-purpose vacant retail space whilst continuing to maintain a measured amount of comparison and convenience shopping floorspace in the Primary Shopping Areas to ensure continued vitality and viability.

18.26 It is also considered vital, to continue to promote local opportunities for shops and services within 400 metres of most people's homes, in order to meet the principles of "living locally", which is a key theme of the Local Plan. To this end, the Plan seeks to protect a small number of specific shops which are needed for essential top-up shopping or are businesses providing services which generally need to be visited in person, unless there is genuine alternative provision as detailed in Policy 20.

Diversifying our centres

18.27 It is recognised that for our centres to continue to thrive, there is a need for diversification and adaptation, including new innovative forms of retailing, accommodating new space where there is identified demand and managing new development and the transition of any surplus retail floorspace to other uses, such as cultural and business. The Council supports the enhancement of quality leisure and cultural uses that contribute to activities during the day and night and appropriately manage the impacts of such uses, in accordance with Policy 19 Managing impacts.

18.28 The spaces within and around our centres can have an important public function, with high streets, public squares, parks, gardens and other open spaces providing opportunities for people to meet and socialise. When considering the quality of place, key factors to be considered are design of shopfronts, accessibility regardless of ability and safe places. The Council will work with partners to promote a quality urban realm by promoting a Healthy Streets approach in developments, as set out in Policy 1 Living Locally.

18.29 The borough has a rich cultural offer, linked with its heritage assets and opportunities for leisure and recreation, providing for residents and visitors, and attracting tourists. The Council's Culture Richmond 2021 to 2031 sets out the vision for an innovative and sustainable cultural offer, with our arts, library, parks, sport and fitness services more closely aligned to broader culture priorities. Many venues and facilities identified in the place-based strategies in section 5 of this Plan, and on the London Cultural Infrastructure Map. London's Arcadia including Kew Gardens, parks, historic buildings and landscapes between Hampton Court and Kew along the River Thames are referred to in paragraph 7.5.12 in the London Plan.

18.30 The London Plan Policy HC5 sets out that development plans should identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters; especially where they can provide an anchor for town centre renewal, and identify, protect, and enhance strategic clusters of cultural attractions. Although dispersed across the borough, there are clusters of existing facilities in the town centres. In particular, Richmond and Twickenham have been identified in this Plan as Cultural Quarters, and other centres have existing clusters of cultural facilities and creative industries. These create an attractive and vibrant area for residents, workers and visitors, as well as reflecting the local character and distinctiveness of our places. There is the potential to grow this cultural and community offer, to help with diversifying our

centres, and for our centres to act as gateways and hubs connecting places through active travel. Town centres may be the point where visitors arrive at a station and can then access other cultural attractions by walking or cycling or river transport.

18.31 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. 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. Any residential proposed will need to address the requirements of other policies in the Plan including Policy 13 Housing Mix and Standards, Policy 46 Amenity and living conditions.

18.32 Residential development contributes to the overall health of centres and to meeting the Borough's housing target. London Plan Policy SD6 part D sets out the suitability of town centres to accommodate a diverse range of housing, including smaller households, Build to Rent, older people's housing, if in accordance with Policy 12 Housing Needs of Different Groups. 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, with adequate facilities and servicing.

18.33 Existing markets will be protected and new and expanded markets supported in line with the NPPF and the London Plan (Policy E9). The latter must demonstrate how potential negative impacts are to be appropriately mitigated, including impact on the vitality of nearby centres.

Policy 19

Managing the Impacts of Development on Surroundings

A. The Council will support proposals which contribute to cultural and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in our centres, and will manage the impacts by ensuring that:

1. new proposals and extensions to existing uses should be of a type and size appropriate to their location, the hours of use proposed, the nature and character of the area; and
2. where there are proposals for new residential properties and they are located in close proximity to established or planned uses with late night licences *or other existing noise or nuisance-generating businesses or community activities*, the proposed residential use will need to demonstrate that it is capable of mitigating its impact, on established uses and future occupiers.

B. Proposals for evening and food and drink uses should be accompanied by a management plan, including mitigation measures for any negative impacts of these uses. Impacts such as noise and light pollution on local wildlife and biodiversity should be considered through appropriate location, design and scheduling. Applications for food and drink uses where home delivery of food is proposed should include a Delivery and Servicing Plan to enable assessment of impacts.

C. The use of outdoor areas including garden areas, rooftops, forecourts and pavements in association with food and drink uses will be supported only where:

1. this would not cause unacceptable harm to the amenity of adjoining residential property and the area generally, taking into account the size and type of the proposal, the hours of use proposed and the nature and character of the area; and
2. in the case of pavements, the width of the footway is adequate to allow this without obstructing pedestrian flow, and the use is arranged so as not to be a hazard to people with disabilities and older people and families with small children. This may require a suitable means of enclosure or boundary to demarcate the extent of the use. Stopping up of public highway to provide private outdoor seating areas will be resisted, especially in town centres.

D. Over-concentration of uses:

1. The Council will resist proposals that result in an over-concentration of similar uses (~~such as~~ *including for example* betting shops, public houses, bars and take-aways) in any one area and/or that would result in an adverse impact on the amenity of nearby users as well as surrounding residential areas.
2. Proposals for fast food takeaways will be refused within 400m of a school as set out in Policy 51 'Health and Wellbeing (Strategic Policy)'.

18.34 Food and drink uses include cafes and restaurants, public houses, wine bars, drinking establishments and hot food takeaways. Evening economy uses can include food and drink uses, night clubs, live music and/or dance venues and other entertainment activities. Overconcentration of similar uses can have a negative effect on amenity and the general environment, including parking, congestion and safety, and/or affect the vitality and function of a centre. The London Plan encourages boroughs to consider appropriate management strategies and mitigation measures.

18.35 The flexibility introduced by Government through Use Class E (commercial, business and service uses) allows for many changes of use to occur without the need for planning permission. However, some specific uses are classed as Sui Generis, including theatres, pubs and bars, hot food takeaways, cinemas, live music venues, and nightclubs which will require planning permission for new uses or to change to another use. In addition, changes of use to Class E will need to be assessed for the range of potential uses within that class.

18.36 During the COVID-19 pandemic, the Government also introduced temporary measures to boost high streets and hospitality which included flexibility to encourage use of outdoor spaces and markets. The Government has made these freedoms permanent, meaning that hospitality businesses no longer need planning permission to put up marquees and other moveable structures on their land and councils will no longer need planning permission to hold an outdoor market.

18.37 Where necessary and justified, the Council will use conditions and/or planning obligations to limit uses consented within Class E in order to achieve the objectives of this policy, to manage the impact of food and drink uses on amenity and the centre, and to avoid the proliferation of main town centre uses outside of town centres; in line with the NPPF and PPG to ensure assessment of impact on the vitality and viability of town centres.

18.38 The London Plan's Town Centre Network recognises Richmond's Night-time Economy as NT2, an area of regional/sub-regional significance, with Twickenham and Teddington classed as of more than local significance (NT3). As set out above in Policy 18 Development in Centres the focus is on supporting diversity in our town and local centres, and directing development at an appropriate scale in line with the borough's centre hierarchy. The place-based strategies set out the vision for each area in the borough, including the opportunities to diversify the cultural offer, improve the public

realm and positively provide “spill-out” from restaurants, cafés and pubs for al-fresco dining where it will enhance the vitality and viability of centres, providing the impacts can be managed.

Over-concentration of uses and amenity impacts

18.39 *For clarity, Part D1 of this policy provides examples of uses to which the policy can apply, but this is not an exhaustive list.* The impacts of food, drink and entertainment uses on the surrounding area need to be carefully managed as such the main location for food and drink and entertainment uses will be the main town centres. Too many similar uses and concentrations can have a negative effect on amenity and/or the vitality and function of centres. These impacts will also be felt more strongly within smaller commercial areas, given their role and function, as well as the concentration of uses in proximity.

18.40 Such uses can sometimes cause problems to nearby residents and businesses because of noise, fumes, traffic and other disturbances, especially at night. The Council will therefore seek to control the size and location of such premises, particularly where there is residential accommodation adjacent, close to, or above premises. In addition, these amenity problems are exaggerated when groups of these facilities are located close together and their cumulative and combined impact becomes significant. However, there are opportunities with new development to include measures to manage potential amenity impacts, for example through natural surveillance and inclusive access, and to provide an enhanced mix of uses that will contribute to our centres becoming vibrant at different times of the day.

18.41 The Council’s Licensing Policy may also be taken into account, in particular the Special Policy on Cumulative Impact. A revised Statement of Licencing Policy came into effect on 3 January 2022 [(4)] which retains Cumulative Impact Areas in Richmond and Twickenham, for all types of licence. A full review of the special policy was carried out in 2021 to take into account the changes brought about by the Policing and Crime Act 2017 which concluded that there was strong evidence to retain such a policy. The highest concentrations of licensed premises lie within Richmond and Twickenham commercial centres. In adopting the special policy, the authority has set down a strong statement of approach to considering applications for the grant or variation of premises licences in both centres. The Statement of Licencing Policy also considers a range of data from various sources including assaults and anti-social behaviour reported to the police, numbers of alcohol-related ambulance callouts and complaints related to licensed premises.

18.42 Where appropriate, conditions and legal agreements will be applied to protect amenity, such as conditions to control the hours of opening, or crime prevention and safety measures.

Agent of Change

18.43 Proposals will be assessed against the ‘agent of change’ principle, as detailed in Policy D13 in the London Plan. For example, if a town centre use is in place before a residential development, as the ‘agent of change’, the residential development is responsible for mitigating the impacts of the existing use. Such impacts can include noise within the premises, smells, light pollution and the impact of those going to and from the facility, such as traffic, car parking and anti-social behaviour. The agent of change principle works both ways. For example, if a new noise-generating use is proposed close to existing noise-sensitive uses the onus is on the new use to ensure it is designed to protect existing users or residents from noise and other impacts.

Extensions to existing uses

18.44 This policy applies to significant extensions of floorspace as well as changes of use applications, whether an extension is considered significant will depend upon the total amount proposed and the proportionate increase in floorspace compared to the size of the existing unit.

4 Statement of Licensing Policy www.richmond.gov.uk/media/22995/licensing_policy_january_2022.pdf

Fast food takeaways

18.45 The Council will refuse new fast food takeaways within 400 metres of the boundaries of a primary or secondary school, as set out in Policy 51 Health and Wellbeing and reflecting London Plan Policy E9. The map within Policy 51 Health and Wellbeing shows the extent of this restriction (as of April 2023).

Policy 20

Shops and Services Serving Essential Needs

Essential shops and services

A. The Council will support and protect essential shops and services which meet the day to day needs of communities, in line with Policy 1 'Living Locally and the 20-minute neighbourhood (Strategic Policy)'.

B. Applications for planning permission that would result in the loss of essential shops and services as defined, will be permitted only where there is genuine alternative provision within walking distance (defined as 400 metres), unless:

1. the existing use is inappropriate in terms of access or amenity and living conditions
2. it has been demonstrated that there is no demand for the use through the submission of satisfactory marketing evidence in accordance with Appendix 2; and/or
3. the proposed use would provide a social or community service or function which outweighs the loss of the essential shop or service, meeting evidence of a local need.

C. The provision of new shopping and services may be appropriate, including as part of new residential or residential-led development, where the scale of the provision is justified and appropriate to meet a local need, and it can be demonstrated through a sequential test that the proposal would not harm the vitality and viability of the borough's centre hierarchy.

D. Where planning permission is granted, conditions may be used in order to control the type of goods sold or activity permitted, including by restricting to a specific use.

Public houses, wine bars and drinking establishments*

E. The Council will resist the loss of public houses, wine bars or drinking establishments. Such uses which are of historic or architectural interest and/or community value will be protected from demolition and/or change of use, in accordance with London Plan Policy HC7. Before accepting the loss of any public house, wine bar or drinking establishment 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 49 'Social and Community Infrastructure (Strategic Policy)'). The applicant will be expected to undertake marketing in line with the requirements set out in Appendix 2.

***Note Section E of this policy applies to public houses, wine bars and drinking establishments**

Essential Shops and Services

18.46 Nearby shops and services are especially important to elderly or less mobile shoppers, those with young children, those without cars and are also useful to everyone for their top-up and emergency shopping. The Council will support such provision to continue to

provide a vital function for surrounding communities and help avoid unnecessary trips by car.

18.47 Although, there is good coverage across the borough in terms of food shopping provision, with most residential areas within walking distance (400 metres) of existing facilities, in some areas shops and services are less accessible. Some communities may be dependent on one or two businesses to meet essential needs which makes them vulnerable, should those shops or services close.

18.48 There are many services which are vital to wellbeing and functioning of the community including social infrastructure uses such as doctors and medical centres, indoor sport including gyms, pilates and yoga studios and educational facilities which are protected by other policies in the plan, particularly by Policies 49, 50 and 51. The essential services to which this policy relates are those which cannot usually be delivered on-line as they require an in-person visit. These services are very much valued by the community and for many need to be local and convenient. Many of these services are supplied by local, independent businesses.

18.49 The availability of local provision of essential shops and services has a significant role to play in realising a key aim of this Plan – the ability to live locally (Policy 1) and facilitating shorter, regular trips by walking or cycling. The pandemic and associated lockdowns have accelerated changes in the way we shop. However, it has also brought the value of the borough's centres, parades and isolated shops sharply into focus whose strength is, amongst other things, their convenience. As more people spend more time at home and in their local areas, particularly during the working week, local businesses can capitalise on this additional footfall and spending.

18.50 The evidence suggests that there will be less retail floorspace needed in the future. Previously, policies protected shopping floorspace regardless of what the shop sold. The preferred approach is more focused, resisting the loss of specific types of shops and services which are considered particularly important (and only where there is no genuine alternative within walking distance (400 metres)). This more targeted policy is intended to be applied everywhere in the borough. Where essential shops and services are located within centre boundaries, they add to overall vibrancy and provide a reason for visiting which facilitates linked trips and thus spending in other businesses. Where they are located outside of centres they are equally, if not more important, and may well be vital to meeting need.

18.51 Essential shops and services are defined in the definitions box at the beginning of this chapter. This policy will apply to businesses with a significant proportion of floorspace selling goods which can be found in defined essential shops or provides an essential service. *It applies where the existing or last use of the premises was selling essential goods or providing an essential service.* In considering if there is genuine alternative provision available, the Council will take into account whether a similar range of provision and/or type of service is provided elsewhere as per the policy. In implementing this policy the Council will be mindful that the closure of some facilities such as Post Offices and banks may be part of a wider programme of closures. The onus is on the applicant to provide the evidence needed to support an application, including demonstrating that there is no longer any demand for such facilities through a period of robust marketing.

18.52 It is noted that changes of use between uses within Class E of the Use Classes Order do not require planning permission, which limits the scope of this policy's application. Where planning permission is required the Council may impose conditions to restrict further change of use in the future, for example, to uses that could compromise the viability and vitality of the borough's centres. Other uses falling outside of Class E, such as community halls or a pub or bar, may also provide enhanced amenities for the local community, and changes to these uses may be supported, where the scale of the provision is justified and appropriate to meet a local need, and it can be demonstrated through a sequential test that the proposal would not harm the vitality and viability of the borough's

centre hierarchy, and subject to appropriate mitigation of any negative amenity impacts (e.g. noise disturbance from a pub or bar).

Public houses and bars and drinking establishments

18.53 Changes to the Use Classes Order mean public houses are now a Sui Generis use. Public houses (including bars and other drinking establishments for the purposes of this policy) play an important role and social function in the local community, and they add to the local character of an area, and can often be buildings of historical or architectural interest. Many pubs provide a hub for social interaction, cultural identity, heritage and character of an area. Therefore, the Council will resist the loss of public houses. In the supporting text to London Plan Policy HC7, there is guidance on the broad range of characteristics that will be taken into account in assessing whether a pub has heritage, cultural, economic or social value. The listing of a pub as an Asset of Community Value will also be a material planning consideration.

18.54 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 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. The criteria of Policy LP 49 Social and Community Infrastructure will be applied when assessing the loss of a pub.

18.55 Applicants should also have regard to the Campaign for Real Ale's (CAMRA) Public House Viability Test.

19 Increasing jobs and helping business to grow and bounceback following the pandemic

Policy 21

Protecting the Local Economy (Strategic Policy)

A. The Council will seek to retain and attract investment from existing and emerging sectors to support the existing business base and create a diverse and enterprising local economy. New development proposals will be supported which:

1. Protect existing employment floorspace for office use, with a no net loss approach. Take an employment-led approach to any redevelopment for industrial use to meet local economic needs through intensification of the existing employment floorspace.

2. Direct major new employment development to the designated Key Business Areas and Locally Important Industrial Land and Business Parks and to the town centres, as identified on the Policies Map. Other employment floorspace of an appropriate scale may be located elsewhere.
3. Any major new development should explore the opportunity to create ground floor industrial provision to address local needs, particularly in town centres and other locations with high accessibility (PTALs 3-6).
4. Provide a range of commercial unit types, that are flexible and adaptable to changing needs, suitable for subdivision and configuration for new economic uses and activities for a range of occupiers;
5. Ensure there is a supply of affordable workspace that is well-designed, flexible and adaptable, to support small and medium sized enterprises or the voluntary and community sector in the borough, as identified in Policy 25 'Affordable, Flexible and Managed Workspace'; and
6. Strengthen the pathways through education and learning into jobs and careers for residents, supporting employment and training skills to maximise local employment opportunities, as identified in Policy 50 'Education and Training (Strategic Policy)'.

19.1 Richmond borough has been relatively resilient to the economic pressures of recent years however, whilst employment capacity has improved in terms of jobs, there have been significant losses in employment land and premises despite strong restraint policies. The continued loss of office stock and industrial land from the borough at past rates is unsustainable. The policy approach in this Plan therefore provides protection against the loss of existing office floorspace and industrial land, encourages its renewal and modernisation, and seeks additional provision, which is vital in terms of local economic and environmental sustainability objectives to create and maintain a sustainable economy. This approach is supported by the Borough Employment Land & Premises Needs Assessment.

19.2 We want to move towards creating a more self-sustaining borough, where education, training and job opportunities are available and 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.

19.3 The Council is required to plan positively for employment land by providing support for existing and new employment sectors. This policy seeks to protect existing employment land within our designated employment areas. In the borough context it is common for employment to be within mixed use areas, because of historic development patterns, resulting in it being dispersed across the borough in a fragmented way. However, this does not provide justification for a change of use, as mitigation can address impacts and constraints such as narrow access, which have been managed by existing occupiers, and therefore do not prevent any future or continued employment use. This is also supported by the Agent of Change principle set out in the London Plan Policy D13 and Policy 53 'Local Environmental Impacts'. In addition, changes to ways of working, servicing and delivery do mean the ways businesses operate are changing. The policy approach is to make efficient use of land by encouraging employment-led intensification.

Changing work styles

19.4 Structural changes in the way offices are viewed in many growth sectors as places for interaction and collaboration, rather than places to go and work at a fixed desk has resulted in a rise in agile working practices such as working from home, hot desking, and shared workspace models – all of which enable the more efficient use of space. This trend was particularly prevalent during the pandemic and may continue. As such, this may reduce the extent to which new jobs

need additional dedicated office floorspace, however the long-term impacts remain uncertain and there is a need to plan for economic recovery. In Richmond the evidence base highlights that the lack of sufficient employment floorspace provision is a constraint on the future employment and business growth in the borough, but in recognition of work trends, it is felt that significant jobs growth could be delivered through the refurbishment and upgrading of outdated stock, to better facilitate such working practices. A new generation of industrial and workshop style provision could also meet future industrial needs but also work for office uses, and be used flexibly as businesses grow and adapt.

19.5 Proposals for intensification and re-purposing of existing employment land should consider the location and its character. Site proposals should be well designed, readily available and adaptable to meet changing business needs and should have regard to operational requirements (including servicing) and mitigate impacts on the transport network where necessary.

Permitted Development Rights

19.6 The Council has made an Article 4 Direction to remove permitted development rights for a change of use from Class E to residential. This covers large parts of the designated employment locations for offices and industrial land and non- designated employment land and premises, identified for their contribution to the overall employment land. It is the Council's intention to continue to enforce its Article 4 Direction to require development involving the loss of employment floorspace to go through planning permission.

Affordable, Flexible Workspace

19.7 Richmond is an enterprising borough; with one fifth of the working age population self-employed and more businesses surviving three years compared to elsewhere in London. Overall, the borough has been relatively resilient to the economic pressures of recent years; however, there are some economic challenges, particularly as a result of limited land availability for employment purposes, and a shortage of office space across the borough leads to increases in rental values and costs for local businesses. The promotion of flexible and affordable workspaces allows us to respond to changing business needs and create robust, future-proofed places, including successful town centres and the promotion of local supply chains and local employment hubs which support the spatial strategy and the living locally concept. The Council will support provision of small units to accommodate a variety of local businesses and small firms at existing employment locations and to provide the opportunity for residents to set up their own enterprise, enabling them to work closer to home.

Policy 22

Promoting Jobs and our Local Economy

A. Proposals for employment floorspace should support suitable workspace for the borough's locally significant and diverse sectors, in accordance with London Plan Policy E8, including those of particular importance to the borough's local economy:

1. Flexible workspace hubs including co-working space and serviced offices in the borough's suburban town centre locations;
2. Space to accommodate small and micro firms, for start-up, incubation and accelerator with corresponding business support;
3. Voluntary, community and local healthcare organisations;
4. Media and creative industries;
5. Scientific research and laboratory space;
6. Theatre, television and film studio capacity;

7. River-related and river-dependent industries; and
8. Opportunities to develop the low carbon and environmental goods and services sector and support the local circular economy.

B. Proposals must provide opportunities for local employment and training, as required by Policy 50 'Education and Training (Strategic Policy)' part ~~B~~ *D*.

C. Proposals for the provision or re-provision of economic uses must provide for a high standard of workspace which reflects local economic needs and is of a design that enables use by a variety of different occupiers including:

1. Adequate floor-to-ceiling heights which are sufficient for the operation of the intended use as well as the provision of serving requirements such as ventilation, heating, lighting, electricity and cabling;
2. Adequate doorway and corridor widths are provided together with clear and flexible floorplates with few supporting columns, to allow for ease of movement and facilitate the efficient use of the floorspace;
3. Level thresholds and inclusive access throughout the building;
4. Adequate servicing and loading facilities, including access bays and service yards, and goods lifts for multi-story developments, as appropriate;
5. Adequate facilities that promote cycle usage, including workspace showers, changing rooms, and lockers, proportionate to the scale of the development and quantity of cycle parking required (see Policy 48 'Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management');
6. Natural light and ventilation. Windowless and basement economic floorspace will be resisted, unless considerations specific to the use prevent this; and
7. Good telecommunications connectivity, including broadband connections and mobile connectivity (see Policy 27 'Telecommunications and Digital Infrastructure (Strategic Policy) ').

D. The design and layout of the development must ensure that the proposed uses can successfully co-exist with surrounding uses, having regard to the amenity of adjacent occupiers and the operational requirements of existing and future businesses, ensuring that any potential conflicts will be adequately mitigated *in accordance with London Plan Policy D13 Agent of Change*.

19.8 The borough is home to nationally important scientific institutions such as The Royal Botanic Gardens, Kew, 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. As such, scientific, innovation and research, provision of incubator units and laboratories will be supported as well as 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. 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.

19.9 Proposals should capitalise on locational advantages related to clustering, compatibility with the wider area and the provision of appropriate infrastructure. Clusters are important for local economies, provide diverse employment opportunities for local residents, and bring knowledge, competition and support to businesses. London Plan Policy E9 encourages collaboration between businesses, higher education providers and other relevant research and innovation organisations. Opportunities for temporary

meanwhile or pop up uses to support the local economy will be supported. The benefits of meanwhile use also include short-term affordable accommodation for SMEs and individuals, generating a short-term source of revenue for the local economy and can attract longer-term business investment.

19.10 Richmond has a slightly larger share of small and especially micro firms compared to London as a whole and a greater number of home workers. The Borough accommodates several large research institutions but there is no complementary local offer for smaller firms operating in the same sector.

19.11 Recent evidence suggests possible growth options for Richmond in the media and creative and scientific research industries and identifies a demand for creative workshops and small-scale R&D incubator or co-locating space as gaps in the workspace market which operators would be keen to explore. These would benefit from a range of unit types, such as identified in the supporting text to Policy 25 'Affordable, Flexible and Managed Workspace'.

19.12 The promotion of flexible workspaces allows us to respond to changing business needs and create places, including successful town centres and the promotion of local supply chain and local employment hubs, which suit the particular needs of Richmond which is dominated by small businesses. Logistics hubs that provide facilities for last mile deliveries by electric vans or cargo bikes will be supported in sustainable locations. These enable local deliveries to be made more efficient and less polluting.

19.13 A sustainable borough is 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, as set out in Policy 1 'Living Locally and the 20-minute neighbourhood (Strategic Policy)'. 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. There may be an opportunity to grow the local economy in terms of new technologies and the green economy, that will contribute to the circular economy and mitigating the impacts of climate change.

19.14 Any proposal that includes new economic floorspace must ensure that the design of the development is suitable for modern business needs and could provide space for a broad range of potential occupants with minimal intervention to the fabric of the building. This can improve the quality of businesses that will be attracted and the jobs that will be created. Full fit-out of the premises beyond shell and core will be encouraged in order to ensure that new development is fit for purpose, does not remain vacant for extended periods, and provides floorspace to meet the needs of businesses without incurring avoidable delays.

Policy 23

Offices

Retention of offices

A. There is a presumption against the loss of office floorspace in all parts of the borough. Proposals which result in a net loss of office floorspace will be refused. Any refurbishment of existing office floorspace should improve the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) as set out in London Plan Policy E1.

New offices

B. The Council will support appropriate new office development by the following means:

1. Major new office development should be directed within the five town centres
2. Smaller scale office development should be in suitable locations, particularly within the designated Key Business Areas as identified on the Policies Map;
3. Design of office floorspace should enable flexible occupation and modern methods of working such as co-working space, with appropriate servicing and delivery; and
4. The Council will require the provision of affordable workspace within all major developments with over 1,000sqm of employment floorspace proposed (gross) in accordance with Policy 25 'Affordable, Flexible and Managed Workspace'.

Policies Map designations

The existing Key Office Areas will be renamed as Key Business Areas and retained on the Policies Map. The following updates will be made:

- 38-42 Hampton Road has been removed as there is no existing office use.

19.15 The Borough Employment Land & Premises Needs Assessment identifies for the forecast period 2019-39 a shortfall of approximately 23,000 sqm of office floorspace, and the Local Plan should seek to accommodate an additional minimum of 199 jobs per annum. The identified shortfall in the amount of office space in the borough has reduced since the pandemic however there is a positive demand for the Plan period and a limited pipeline of supply.

19.16 London Plan Policy E1 supports diverse office markets in outer London and increases in the current stock of offices in locations such as existing business parks and town centre locations with locally-oriented provision to meet local needs. It also goes on to state that existing viable office floorspace capacity in locations outside these areas should be retained.

19.17 Given the need for office floorspace identified within the borough Employment Land & Premises Needs Assessment, the policy approach to protecting existing office stock will apply where planning permission is required for a change of use, or to extensions and new development.

19.18 The Council will apply this policy to consider the loss of office use, for applications seeking a change of use or redevelopment that requires planning permission (such as to Class F or Class C), if a building has been in an office use (as evidenced in the Town Centre Land Use Survey, business rates or other available evidence).

19.19 Where a proposal involves a change of use not supported by policy, the Council will require satisfactory marketing evidence. An application is expected to set out why it is not suitable for continued commercial, business or service uses, and the site should be marketed both for its existing office use and alternative employment generating uses including 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. A full and proper marketing exercise can be submitted in accordance with the marketing requirements in Appendix 2. Such evidence will be a material consideration, however provision of marketing in itself does not justify an exception to policy.

Article 4 Directions

19.20 Offices are now within Use Class E, rather than the former B1(a), to meet government objectives of increasing flexibility for a wider range of uses. It is recognised that this could potentially compromise the ability of the Council to protect existing office space in line with this policy, as well as with the requirements of paragraphs ~~80~~ *81* and ~~81~~ *82* of the *September 2023* NPPF */ paragraphs 85 and 86 of the December 2023 NPPF*. Changes of use within Class E are not considered to be development and therefore do not require planning permission.

19.21 The flexibility of Class E should improve the prospects of finding an alternative employment generating use when commercial units become vacant. Class E provides applicants with scope to consider if former offices are able to accommodate light industrial uses, which is encouraged given the continuing shortfall in industrial land in the borough identified in Policy 24 'Industrial Land'. Where necessary and justified, the Council will use conditions and/or planning obligations to limit uses consented within Classes E to (g)(i) or (g)(ii) in order to achieve the objectives of this policy and in line with the NPPF and accompanying PPG to support economic growth and to mitigate the impacts of development given the range of uses that need to be fully assessed.

19.22 In March 2021 government published legislation in England to introduce a new and much broader permitted development right (PDR), Class MA which came into effect on 1 August 2021 for the change of use of properties in the Commercial, Business and Service use class (Class E) to residential (C3), subject to a range of conditions and limitations.

19.23 A modified Article 4 Direction (Class E to C3) came into force on 31 July 2022. The Article 4 Direction is limited to those offices that make the most valuable contribution to the employment floorspace needs of the borough.

19.24 It is the Council's intention to continue to enforce its Article 4 Direction to require development involving the loss of office floorspace in specific areas to go through planning permission. This approach accords with London Plan Policy E1 part F, which supports Article 4 Directions for viable strategic and local office clusters such as in town centres and other viable business locations.

19.25 The Key Business Areas are set out below:

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 and LGC Ltd, 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

Twickenham:

- Twickenham centre (part)
- Bridge House, Twickenham
- Hampton Road, Twickenham
- 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, St Margarets
- 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
- London House, 243-253 Lower Mortlake 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

Barnes:

- Prospect Studios, Barnes High Street, Barnes
- 42-46 Glentham Road, Barnes

19.26 Provision of office floorspace remains a priority in our town centres. The changes to the Use Classes Order increase flexibility for offices to form part of the range of uses within town centres, and additional office space will be supported, including through the repurposing of existing commercial floorspace, across the centre hierarchy as they are the focus of commercial activity. With the COVID-19 pandemic and economic recovery, it can be expected that there will be a continued need for local offices/workspace. Companies may choose to have more local and smaller offices, closer

to where people live, to reduce commutes - a multi-site solution, promoting more resilient workplaces.

19.27 Richmond town is the borough's main office market and the borough Employment Land & Premises Needs Assessment recommends it is the prime location, with both demand and viability, to focus and prioritise office growth. London Plan Policy SD7 requires boroughs to assess the need for main town centre uses, taking into account capacity and forecast future need. The London Plan's town centre network also identifies Richmond as a centre with speculative/mixed-use office potential, Twickenham with mixed-use office potential, and for Teddington and East Sheen to protect small office capacity where there is demand for existing office functions, generally within smaller units. This may result in prioritising the borough's town centres as agile workspace locations and help with high street revitalisation, as set out in the section 'Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic'. New developments within the Key Business Areas should encourage active travel modes, particularly where these are located outside of the borough's centres.

Policy 24

Industrial Land

Retention of industrial space

A. There is a presumption against loss of industrial land in all parts of the borough. Proposals which result in a net loss of industrial land will be refused. Any redevelopment proposals are required to contribute to a net increase in industrial floorspace. Any refurbishment of existing industrial floorspace should include traditional formats along with workspace for light industrial, through intensification as set out in London Plan Policy E7 part A.

B. The Council will require the provision of affordable light industrial workspace within all major developments, over 1,000sqm of employment floorspace proposed (gross), in accordance with Policy 25 'Affordable, Flexible and Managed Workspace'.

New industrial space

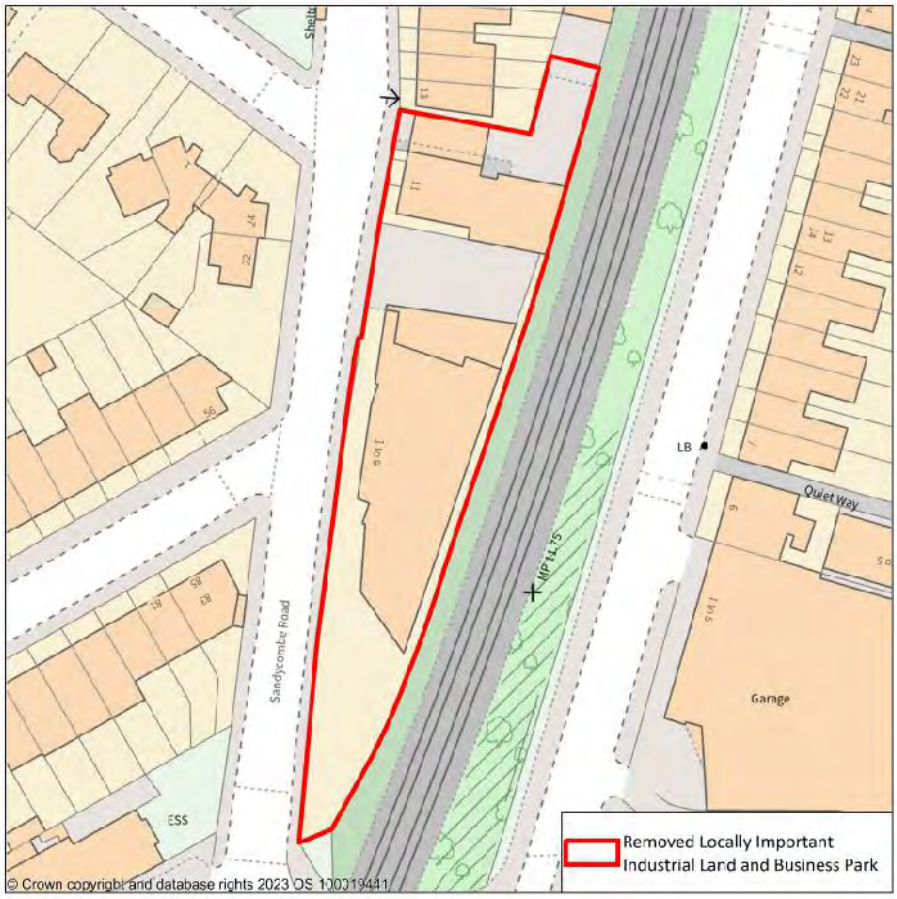
C. The Council will support appropriate new industrial space by the following means:

1. Major new development proposals for industrial space should be directed towards the identified Locally Important Industrial Land and Business Parks as identified on the Policies Map;
2. It can be demonstrated that new proposals would not adversely impact on the continued operation of other established employment uses within that site or on neighbouring sites;
3. New industrial space is flexible and adaptable for different types of activities and suitable to meet the requirements of local businesses; and
4. Extensions to existing employment uses are of an appropriate scale in keeping with the surrounding area, role and function.

Policies Map designations

The existing Locally Important Industrial Land and Business Parks will be retained on the Policies Map. The following updates will be made:

- Sandycombe Centre, Sandycombe Road, Kew has been removed as it has been redeveloped for non-industrial uses.



19.28 Industrial land is defined as land used for industrial and warehouse uses (E (g) (iii), B2 and B8) within Richmond borough. Land which does not fall within these use classes but is considered to contribute to the reservoir of industrial land in the borough, for example uses which support, contribute to, or could be drawn upon to meet the demand for industrial land, will also be protected in line with the policy.

19.29 The Council has designated Locally Important Industrial Land and Business Parks in accordance with the requirements of London Plan Policy E7 to identify Locally significant Industrial Sites (LSIS) which are recognised for their importance locally in providing job opportunities and meeting local business needs. In the borough these 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 LGC Ltd, Hampton Road, Teddington
- Teddington Business Park, Station Road, Teddington
- West Twickenham cluster (including Gregg's Bakery and surroundings), Twickenham
- Heathlands 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, St Margarets
- Market Road, Richmond
- 159 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

19.30 The Employment Land & Premises Needs Assessment identifies a minimum (net additional) requirement for 60,000sqm of industrial floorspace for the forecast period 2019-39 and notes that vacancy rates are now 0.5%, well below the London average for industrial land, which is critical for the borough as this means we do not have available capacity for future industrial demand.

19.31 Richmond has continued to lose industrial stock – with the Valuation Office Agency (VOA) recording a total stock of 163,000 sqm in 2015 falling to 141,000 in March 2022. This corresponds with the London Industrial Land Supply Study 2020 (Executive Summary published in January 2023) which has found the total stock of land in industrial use in London has progressively declined since 2001. The Borough is increasingly reliant on industrial and logistics space outside the Borough to service its population, which will have a negative impact on traffic and associated congestion and air quality, and does not accord with the concept set out in Policy 1 'Living Locally and the 20-minute neighbourhood (Strategic Policy)' and a thriving local economy which minimises travel. The GLA Job growth projections 2016, estimated the requirement for 0.5ha per annum of industrial land, to accommodate 100 industrial jobs per annum, over the period 2016 to 2041, which identifies the need for 60,000 sqm net additional space for industrial uses.

19.32 The policy approach to protecting existing industrial stock will apply where planning permission is required for a change of use, or to extensions and new development.

19.33 Where a proposal involves a change of use not supported by policy, the Council will require satisfactory marketing evidence. An application is expected to set out why it is not suitable for continued commercial, business or service uses, and the site should be marketed both for its existing industrial use and alternative employment generating uses including as flexible, start-up or co-working space. Prices should be based on the local industrial market and on the existing quality of the accommodation. A full and proper marketing exercise can be submitted in accordance with the marketing requirements in Appendix 2. Such evidence will be a material consideration, however provision of marketing in itself does not justify an exception to policy.

19.34 *The Industrial Land and Uses London Plan Guidance (consultation draft December 2023) provides guidance on assessment of development proposals, including expectations for intensification and co-location considerations.*

Light industrial workspaces

19.35 The Council will protect employment uses within the identified key industrial land locations and across the borough as it is important to retain a diverse range of different types and sizes of industrial spaces across the borough. Land in industrial use including local service trades such as builders' yards

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. A truly effective approach to affordable workspace delivery will need to consider all of the factors affecting affordability of space (not just rent) to ensure that a range of spaces are available and affordable to target businesses.

19.36 The evidence sets out the need to deliver a net increase in industrial floorspace with ground floor priority to more traditional formats of space (high ceiling heights and direct loading) with upper floors used for workspace and light industrial (with goods lift) specified space with adequate vehicle servicing space. While a case could be made for small-scale enabling residential to enable employment-led intensification, there should not be reprovision in favour of office employment space, as economic floorspace should be directed to meet the identified economic needs. Where necessary and justified, the Council will use conditions and/or planning obligations to limit uses consented within Classes E to (g)(ii) or (g)(iii) in order to achieve the objectives of this policy and in line with the NPPF and accompanying PPG to support economic growth and to mitigate the impacts of development given the range of uses that need to be fully assessed.

Article 4 Direction

19.37 The former B1(c) use class (light industrial) is now incorporated within the much wider Use Class E, and changes of use within Class E can occur without the need for a planning application. In March 2021 Government published legislation in England to introduce a new and much broader permitted development right (PDR), Class MA which came into effect on 1 August 2021 for the change of use of properties in the Commercial, Business and Service use class (Class E) to residential, subject to a range of conditions and limitations, including a requirement for prior approval of the authority of the impact on intended occupiers of the development of the introduction of residential use in an area the authority considers to be important for general or heavy industry, waste management, storage and distribution, or a mix of such uses .

19.38 A modified Article 4 Direction (Class E to C3) came into force on 31 July 2022. The Article 4 Direction is limited to those industrial sites that make the most valuable contribution to the employment floorspace needs of the borough.

19.39 It is the Council's intention to continue to enforce its Article 4 Direction to require development involving the loss of light industrial floorspace in specific areas to go through planning permission. This approach accords with London Plan Policy E4 part G, which supports Article 4 Directions to retain sufficient industrial and logistics capacity.

Policy 25

Affordable, Flexible and Managed Workspace

A. Existing affordable workspace will be protected. The redevelopment of existing affordable, flexible and managed workspace must re-provide the maximum viable quantum of such employment floorspace in perpetuity, at equivalent rents (taking into account service charges).

B. In accordance with London Plan Policy E3, the Council will require the provision of affordable workspace through:

1. Supporting the provision of affordable space as part of mixed-use schemes, where feasible, in town centres, that can be used for remote working and start-up space;

2. Securing the provision of affordable workspace in commercial developments that is flexible, suitable for subdivision and configuration for new uses and activities, including for occupation by small or independent commercial enterprises;
3. Securing provision in perpetuity or as appropriate through the appointment of managed workspace providers where new business space is provided, by condition and/or a Planning Obligation; and
4. Requiring the provision of affordable workspace within major developments with over 1000sqm of employment floorspace proposed (gross), to be secured through planning obligations.

19.40 Richmond has a significant local economy, with a high proportion of small businesses serving local residents and other local businesses. Provision of affordable, flexible and managed workspace is necessary to support small and new businesses including those operating on a not-for-profit basis. The redevelopment and intensification of the borough's employment sites can offer opportunities for the provision of affordable workspace as part of mixed-use schemes.

Affordable workspace

19.41 London Plan policy E3 defines "affordable workspace" as workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose. It can be provided and/or managed directly by a dedicated workspace provider, a public, private, charitable or other supporting body; through grant and management arrangements; and/or secured in perpetuity or for a period of at least 15 years by planning or other agreements.

19.42 It is important to note that the increasing focus of the Richmond Borough's economy lies within activities that are set to drive growth of the London economy such as activities that cut across creative endeavour, digital technology, software, product and content design and small batch production and professional services. Creative industries are an area of specialisation for the borough's economy. Within this sector the borough stands out in a number of activities: software consultancy, architectural and engineering activities, and advertising. Retail in specialised stores is also significant as are publishing activities, reproduction of video and sound recording and computer media.

19.43 The Borough's economy is characterised by the large proportion of micro-business units both, as a result of businesses employing <10 employees and of the large proportion of self-employed residents. The current split by business size across the borough identifies that most businesses fall within the SMEs category. There are 13,535 businesses in Richmond of which 93.1% employ fewer than 10 people. This proportion of micro businesses is slightly higher than the London average of 90.8%, with 14.6% of Richmond's population being self-employed, which is slightly higher than the London average of 11.1%.

19.44 The limited availability of stock in Richmond has hindered the growth aspirations of the workspace market. The Employment Land & Premises Needs Assessment has found that there are few existing providers of workspace in the borough and that these tend to be clustered around Teddington and Richmond town centres. Within the existing provision, most workspaces offer the format of sub-divided office property and co-working space targeted at professional and business services sectors – these may provide flexible terms and other features that appeal to small firms but are still essentially offices. They are located in serviced office buildings like Spaces Teddington, or within institutional buildings like The Bridge Workspace operating out of Richmond and Hillcroft Adult Community College. Although based on limited data, it was found that the rent levels for co-working spaces in the borough were quite high, as can be the case with serviced offices, with levels more equivalent to co-working markets on the fringe of central London, than those of the outer boroughs.

The result of this may be that there is a segment of users who are priced out of this market in the borough.

19.45 What has been found to be missing from the current stock is provision for firms and sectors that cannot operate in the traditional office and co-working spaces. This includes a lack of affordable, flexible 'studio workroom' units and ground floor light industrial and larger industrial units for creatives, local makers and film-related industries. Demand has been identified for a greater diversity of workspaces beyond the standard office format to support a range of sectors across business stages.

19.46 The following priority sectors for the borough have been identified in the evidence:

- Support micro businesses and small businesses through the provision of flexible office spaces that can accommodate small teams (micro-small businesses), to grow-on premises, and expand to a sizable business within 2-3-5 years. Appropriate property typologies include office units/co-working space and light industrial studio/workroom space.
- Support for the borough's creative and media sector, which is a strong sector in nearby boroughs, but lacking a supply of space in this borough. Employment space needs to be of varying size, adaptable and with a mix of ceiling heights, offering both ground floor and upper floors, with some spaces suitable for accommodating and servicing production/light industrial activities. Appropriate property typologies include SME office units/co-working space, light industrial studio/workroom space and light industrial units.
- Support small scale scientific, innovation and research space with a provision of incubator units and laboratories. While the borough accommodates a number of large universities and research institutions, there is no complementary local offer for smaller firms operating in the same sector. The creation of innovation hubs and R&D incubators can offer opportunities for co-location.

Flexible and managed workspace

19.47 The Mayor of London identifies 'open workspaces' as having affordable rents, flexible terms and shared facilities. They allow entrepreneurs, creatives and small businesses to grow, network and flourish. These workspaces can be designed and managed to support SMEs and will vary depending on the end occupier or sector but must be desirable and support typologies that allow for shared facilities and/or low-cost or managed workspaces, ensuring that they can cater for a range of business needs. Often these include workspace with flexible and/or low-cost rental terms, co-working spaces, incubator spaces, accelerator spaces, creative/artist spaces and makerspaces. Shared facilities could help create workspaces which are more space efficient and more viable as costs can be shared which will promote the collective and efficient use of resources.

19.48 Managed workspaces offer benefits generated by the clustering of a number and range of businesses in one location, as well as the opportunity to incorporate support features that benefit small and new businesses. Features of managed workspaces can vary depending on the provider and sector, but can include business support, networking opportunities, access to financial support, shared spaces and facilities, flexible rent and leasing arrangements and flexible layouts that can be modified as businesses grow. Where managed workspace is being proposed, the details will be secured through a Workspace Management Plan. The Council will expect that a managed workspace provider should be identified at the application stage in order to ensure that it is deliverable, and there should be a long-term commitment to maintaining the managed workspace provision in the development. If an applicant proposes to manage the workspace themselves, they will need to demonstrate how this provision will meet the requirements of the policy through the Workspace Management Plan.

Affordable workspace within major developments

19.49 The Council will require the provision of affordable workspace within major developments, where over 1,000sqm of

employment floorspace is proposed. Affordable workspace should constitute at least 10% of the proposed employment floorspace within major mixed-use schemes and commercial schemes and the workspace must remain affordable for a minimum of 15 years. Affordable workspace is considered to have a rent and service charge of less than 80% of comparable local market rates, however market rates will vary according to a range of factors such as location within the borough, the quality and type of stock. As part of a proposal, there will need to be an assessment of local evidence relating to the specific location of the proposal and its target market, with a focus on rents or charges which are accessible for early-stage businesses, and justifies the discount that is proposed.

19.50 A Workspace Management Plan will be required to set out the details of how the affordable workspace provision will meet the requirements of the policy. This will be secured through a Section 106 Agreement in line with the guidance in the Council's Planning Obligations SPD.

Off-site provision of affordable workspace

19.51 New affordable workspace should normally be provided on-site. This is to ensure that the workspace is provided in a range of locations across the borough, including those higher value areas where certain occupiers may struggle to find suitable, affordable premises. Only in exceptional circumstances, where it can be demonstrated robustly that this is not appropriate or feasible to do so, the Council will consider whether there are alternative interventions that achieve equivalent or higher value and impact through an off-site contribution. This may be through a financial contribution towards existing and/or new similar facilities nearby that is considered to directly mitigate the impact of the development and therefore meet the tests for a Section 106 contribution.

Policy 26

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; either 10% of hotel bedrooms should be wheelchair accessible or 15% of new bedrooms to be accessible rooms as set out in London Plan Policy E10;
4. enhancing the environment in areas leading to, within and around visitor destinations where appropriate;
5. supporting the Cultural Quarters in Richmond and Twickenham and other existing clusters of cultural facilities and creative industries, particularly in town centres, and where ancillary facilities are proposed that are open for public use (such as restaurants, gyms and conference facilities).

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, or short-term accommodation with stays not exceeding 90 days, subject to other Local Plan policies.

19.52 The Council recognises the value of the visitor economy both to the local and London economy. The COVID-19 pandemic has impacted on travel, particularly overseas visitors, and uncertainty has affected the sector. However in the short-term there has been growth in a stronger staycation market, with the Mayor's recovery plans including a 'Let's Do London' campaign in 2021. There could be a flexible approach to enable temporary uses in exceptional circumstances; however the protection of the existing stock of visitor accommodation is considered vital given the borough's rich visitor and cultural infrastructure. The Council's vision for our arts, libraries, parks and sport and fitness services set out in Culture Richmond 2021 – 2031 aims to support the growth of culture and creativity in the borough, while adapting to be resilient. A refreshed Visit Richmond Strategy to support local centres and the visitor economy was agreed to be undertaken by the Council in February 2022, including to invest in a new Visit Richmond marketing campaign.

19.53 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. Parts of both Richmond and Twickenham town centres have existing cultural areas with clusters of existing uses, defined as Cultural Quarters in the theme 'Shaping and supporting our town and local centres' that can be a focus for improving the offer to visitors, bringing opportunities to stimulate vibrancy and viability and promote diversity, through linked trips and providing additional public uses (with access secured through a legal agreement) that form a destination as well as providing local job opportunities. The London Plan sets out that the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted, in Policies E10 and HC5. 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.

19.54 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 town centres in the first instance as in Policy 18 Development in Centres, which also sets out guidance on the appropriate location and scale of hotel development. London Plan Policy E1*0* seeks an additional 58,000 bedrooms of serviced accommodation by 2041, with boroughs in outer London expected to plan proactively for new accommodation and the London-wide evidence base reflects boroughs take a share of the London supply projection. The GLA published a Technical Note in 2022 [5] which updates hotel accommodation projections. It was recognised that although forecasting was difficult, it was nevertheless expected that tourism would return to its pre-crisis levels by the middle of the decade. 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.

19.55 The London Plan also requires visitor infrastructure to contribute to improving the availability of accessible serviced accommodation, as vital to ensure that as many visitors as possible can stay in London and experience its visitor attractions and business offer. London Plan Policy E10 has a policy requirement which allows developers to select between two options based on which

5 GLA Economics, London Visitor Nights Projection Technical Note, January 2022

best fits the scale of development proposed. These requirements aim to recognise the need not only for standard wheelchair accessible rooms, but also rooms suitable for people with ambulant mobility impairments or older people who could benefit from additional access features, as well as rooms suitable for people who require assistance or who require a carer.

19.56 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.

19.57 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.

19.58 In addition, proposals will be assessed in the context of maximising housing delivery, including affordable housing. In existing residential areas, there will need to be consideration whether a proposal for visitor accommodation would compromise capacity to meet the need for conventional dwellings. As set out under Policy 14 Loss of Housing, short-term holiday rented accommodation can be beneficial in providing for short-stays in sustainable locations, such as town centres and areas better served by public transport, however using for more than 90 days a year will be resisted where there is a detrimental impact on the existing housing stock.

Policy 27

Telecommunications and Digital Infrastructure (Strategic Policy)

A. The Council will promote the enhanced connectivity of the borough through supporting infrastructure for high speed broadband and telecommunications including next generation technology such as 5G and full fibre broadband connections. New development is expected to provide for full fibre and mobile connectivity in accordance with London Plan Policy SI 6 part A.

B. 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, including in line with Policy 28 'Local Character and Design Quality (Strategic Policy)', 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.

19.59 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. Digital technology has the ability to transform how businesses operate with flexible working and more web communication expected to continue their popularity particularly due to the increase in home working.

19.60 London Plan Policy SI 6 sets out that the Mayor works with network operators and helps to identify spatial gaps in connectivity.

19.61 High speed broadband technology will also enhance the provision of local community facilities and services, for example in the health sector to enable delivery of new models of care and integrated working, and to support smart technologies in terms of the collection, analysis and sharing of data on the performance of the built and natural environment such as water and energy consumption, waste and, air quality. 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.

19.62 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.

19.63 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.

19.64 *The Digital Connectivity Infrastructure London Plan Guidance (October 2024) provides guidance on key requirements for development to support digital connectivity infrastructure, achieving better design and mitigating any adverse impacts.*

20 Protecting what is special and improving our areas (heritage and culture)

Policy 28

Local Character and Design Quality (Strategic Policy)

A. The Council will require all development to be of high architectural and urban design quality. The character and heritage of the borough has been identified in the borough-wide characterisation work undertaken as part of the Urban Design Study. The 'places' as identified in the Study will need to be maintained and their character 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.

B. To ensure development respects, contributes to and maximises opportunities to enhance the local environment and character, proposals must reflect and demonstrate the following principles:

1. Ensure the proposal is compatible with the local character, including the relationship to existing townscape, development patterns, views, local urban grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;
2. Ensure the development provides a high-quality sustainable design, construction and layout, including adaptability to climate change whilst responding positively to the local character as identified in the Urban Design Study and Conservation Area Appraisals/Statements;
3. Use a design-led approach to optimise the potential of a development site through layout, siting and access arrangements, to ensure the development integrates positively with its surroundings;
4. Ensure the development takes account of the existing urban grain and development patterns, including relationship of heights to widths;
5. Sympathetically upgrading and reusing existing buildings, rather than demolishing and building new, allows a better response to the local character whilst also making substantial energy savings due to the embodied carbon in existing buildings that would otherwise be lost through demolition (see also Policy 4 'Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy) ');
6. Ensure the development responds to and where possible improves existing patterns of movement, permeability and street widths that encourage and promote active travel and well-being;
7. Maximise opportunities for urban greening, and integrate existing and incorporate new natural features into a multifunctional network that supports quality of place and biodiversity, which address climate change and resilience;
8. Ensure public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain (as set out in London Plan Policy D8);
9. Ensure the design, layout and materials respect and respond to the historic environment and any relevant heritage assets;
10. Ensure developments achieve the highest standards of accessible and inclusive design, in accordance with London Plan Policy D5, with the aim of providing connectivity and permeability throughout (as such gated developments will not be permitted);
11. Minimise opportunities for crime and antisocial behaviour, based on an understanding of the locality and site-specific circumstances, utilising principles of natural surveillance and orientation of buildings as well as uses, with all major development expected to meet the standards and objectives of the Secured by Design initiative;
12. Consider the holistic impact on the local suitable microclimate, including as a result of lighting features; and
13. Ensure the development's proposed uses are suitable and compatible for the proposed location, providing a mix of uses including local services and facilities to support daily life and enable

communities to 'live locally' in accordance with Policy 1, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site.

C. All proposals, including extensions, alterations and shopfronts, will be assessed against the policies contained within an adopted neighbourhood plan where applicable, and the advice set out in the Urban Design Study and the relevant Village Planning Guidance and other SPDs relating to character and design.

Shopfronts

D. The Council will resist the removal of shopfronts of architectural or historic interest. Shopfronts, 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 the context within which it is located. External security grilles and large illuminated fascias will only be allowed in exceptional circumstances. In sensitive areas, such as Conservation Areas and relevant Character Areas as identified in the Urban Design Study and the Village Planning Guidance SPDs, rigid and gloss finish blinds will generally be unacceptable.

Advertisements and hoardings

E. 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).

Urban Design Study

20.1 As part of the development of the Local Plan, the Council has carried out an Urban Design Study, which shows a greater understanding and appreciation of the existing character of the different places of the borough. The Urban Design Study divides the borough into high-level 'Places' and lower level 'Character Areas', each with its own distinctive character, evolution and series of neighbourhoods. The identification of places has been informed by a comprehensive process involving the analysis of existing planning designations, built form characteristics and historical evolution of areas. The process has also been informed by the existing Village Planning Guidance SPDs.

20.2 The borough-wide characterisation work in the Urban Design Study considers what makes one area distinctive from another, what qualities are significant and critical to local character, and why is a particular townscape or landscape important, and to whom. The characterisation work creates a background against which new development can be balanced with protecting and enhancing what makes Richmond as a borough so special in line with guidance on delivering good design through the planning process in Local Plan Policy 44. It is expected that applicants and developers follow the guidance and advice set out in the Urban Design Study and the Village Planning Guidance SPDs when considering the design- and character-led approach to development.

~~Village Planning Guidance SPDs and Conservation Area Appraisals~~

20.3 Village Planning Guidance SPDs were developed for all areas of the borough, (with the exception of Ham and Petersham, where there is an adopted Neighbourhood Plan for the area). The SPDs identify the key features and characteristics of the village areas that are valued by local communities. Within the SPDs, each area has been subdivided into Conservation Areas and Character Areas, and for each area the context, character and local features have been analysed and assessed.

20.4 ~~The Council has agreed a two year forward programme for prioritising reviews of the borough's existing Conservation Area Appraisals and developing new Appraisals for those areas that do not yet have an existing one, which commenced in 2021.~~

20.5 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. The Council will consider producing further supplementary planning document(s) or toolkits to inform small site design expectations on residential-led projects, along with updates to the Design Quality SPD (2006) and Small and Medium Housing Sites SPD (2006).

Design quality and character

20.6 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 standard, 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 Urban Design Study, complemented by the Village Planning Guidance SPDs. This locally based approach that is sensitive to an area's character can also contribute to achieving the Council's objectives relating to climate change, biodiversity and living locally.

20.7 Developments should demonstrate an appreciation and understanding of vernacular, local character and architectural precedents in the local area, whilst not preventing or discouraging appropriate innovation and design. 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. Opportunities should be taken to improve the general level of design of an area where appropriate. New development should respect existing street and development patterns.

20.8 Policy D1 of the London Plan addresses the issue of understanding character and context, noting that an understanding of the character of a place helps to ensure an appropriate balance is struck between existing fabric and any proposed change. As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive.

Materials and façade design

20.9 The Council will expect the use of high-quality and sustainable materials, urban greening and biodiversity features as well as planting and landscaping reflecting the local character and distinctiveness of an area in all schemes where this contributes positively to the appearance and character of an area. The degree of symmetry, variety, colours as well as the pattern and proportions of windows and doors, materiality and their details together influence the design quality and character of a building and place.

20.10 The choice of building materials should mitigate the contribution to the urban heat island effect through thermal radiation as well as release of anthropogenic (waste) heat, having regard to Policy 4 Minimising Greenhouse gas emissions and promoting energy efficiency.

Relationship to other buildings

20.11 The 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 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 a development will connect or relate to the wider open space network.

20.12 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.

Public realm

20.13 Developments should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain, as set out in London Plan policy D8. Proposals should ensure that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm. This includes having active frontages at ground floor, with the main access provided along the frontage facing primary streets. Depending on the development and its location, public realm and public spaces should support a wide variety of activities and create places where people want to go to, meet and socialise. Public realm and public places directly contribute to local identity and character. Applicants should refer to the detailed guidance in the Council's Public Space Design Guide.

20.14 For a mixed-use scheme, it is preferred that the ground floor contains commercial or community uses, having regard to the location of the site. Where practicable, buildings with ground floor non-residential use should supplement the existing public realm through the incorporation of public spaces such as plazas at their entrance. In case of tall buildings located close to the street edge, proposals should incorporate measures to soften their edges and provide positive public spaces at their base through the use of generous walkways and mature planting.

Access and layout

20.15 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. Where required, development proposals should maintain through-access for ease of pedestrian movement and permeability.

20.16 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.

Secured by Design

20.17 The Secured by Design scheme has proven results in reducing crime and fear of crime, resulting in significant reductions in burglaries and criminal damage on new build and major refurbishment projects. The scheme is also successful in reducing anti-social behaviour through a wide range of measures including robust communal door standards, access control and careful design and layout of new homes. Applicants are encouraged to consult with the Metropolitan Police designing out crime officers at the earliest opportunity and include details of security and Secured by Design compliance within Design and Access Statements.

Microclimate and lighting

20.18 Consideration should also be given to the local microclimate created by buildings. 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. The design should avoid lighting features that negatively impact on biodiversity or surrounding buildings (particularly residential), as well as on night-time vistas and panoramas. The building façade design and

glazing should consider the building use at night and minimise light spill that can exacerbate light pollution, and should avoid any harsh solar glare onto any public areas as well as surrounding development. Where required, shade analysis should be carried out to ensure that the building shadow does not adversely impact solar gain and thermal comfort in key public spaces during times of busy use.

20.19 The lighting of the public realm needs careful consideration to ensure it is appropriate to address safety and security issues, and make night-time activity areas and access routes welcoming and safe, while also minimising light pollution and thereby impacts on biodiversity, protected species as well as residential amenity.

Co-location and compatibility

20.20 Proposals should demonstrate that the proposed uses and activities are suitable and compatible with each other and surrounding land uses. Providing a mix of uses including local services and facilities that support daily life are important to accord with the Policy 1 on Living Locally and the 20-minute neighbourhood. 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.

Shopfronts and shop signs

20.21 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, shopfronts 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 guidance in the Urban Design Study and Village Planning Guidance SPDs, as well as the Shopfronts SPD.

20.22 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; on biodiversity and protected species, 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

20.23 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;

- 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;
5. proposals for digital advertising displays are encouraged to maximise energy efficiency.

20.24 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.

20.25 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 or public safety.

Policy 29

Designated Heritage Assets

A. The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced 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. Total loss of or substantial harm to a listed building should be wholly exceptional and will therefore be refused unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss in line with national policy requirements.
3. Resist the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place, unless it secures the optimum viable use and/or there are public benefits to outweigh the harm.
4. Resist the removal or modification of features such as original structure, layout, architectural features, materials as well as later features that contribute to the significance of the listed buildings.
5. Demolitions (in whole or in part), alterations, extensions and any other modifications to listed buildings should be based on a proportionate understanding of the significance of the heritage asset.
6. Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within listed buildings, 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.

8. Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.
9. Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.

B. Resist substantial demolition in Conservation Areas and any changes that could harm heritage assets, 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. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.

D. 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.

E. Outline planning applications will not be accepted in Conservation Areas unless it can be demonstrated that the impacts of the development on the significance of the area can be fully assessed including views and vistas. 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.

F. Sympathetic measures to make energy and carbon savings in historic and listed buildings are encouraged, by adopting a 'whole house approach' and understanding all the factors that affect energy use to avoid maladaptation. Any potential damages to the structure or heritage value, or impacting the setting of, historic buildings have to be avoided.

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

20.27 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. The borough has 85 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. The Council has agreed a programme for prioritising reviews of the boroughs existing Conservation Area Appraisals and developing new Appraisals for those areas that do not yet have an existing one, which commenced in 2021. The Urban Design Study also provides a high-level character assessment of the borough, albeit not as fine-grained as other studies.

20.28 The borough has approximately 1,115 listed buildings, including some war memorials, 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 (see Policy 32 of this Plan).

20.29 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.

20.30 Applications for development that affect designated heritage assets or their setting must:

1. 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.
2. 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 and the views and vistas identified in the Policies Map, or in relation to a listed buildings, Scheduled Ancient Monument or Historic Park or Garden.
3. 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.
4. Conserve and retain original or historic garden or landscape features as well as architectural features such as windows, doors, chimney stacks, walls and gates.
5. 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.
6. Demonstrate that the proposal is of exceptional design that integrates with and makes a positive contribution to the historic environment; and
7. Take opportunities to reinstate missing features which are considered important to, or to remove additions or modifications that harm, the significance of the asset.

20.31 Outline planning applications will not be accepted within Conservation Areas because the character, appearance and distinctiveness of those areas can be dependent on the detail of developments*, unless it can be demonstrated that the impacts of the development on the significance of the asset can be fully assessed including views and vistas*.

20.32 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, shopfronts, memorials, other street furniture, walls and boundaries, open land and civic space. Conservation Area Appraisals 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, 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.

20.33 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. Careful and sensitive maintenance, management and reuse of heritage assets also saves embodied carbon and avoids the carbon dioxide of constructing new buildings.

20.34 It is the case that:

1. Substantial harm to, or loss of, a Grade II listed building, Park or Garden should be exceptional.
2. Substantial harm to or loss of designated heritage assets of the highest significance, notably Scheduled Monuments, Grade I and II* listed building, Grade I and II* Registered Parks and Gardens should be wholly exceptional.
3. Insensitive alterations to, or extensions to neighbouring developments of, listed buildings will not be allowed.

20.35 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 harm its significance in relation to heritage interest and character. 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.

20.36 Historic buildings have often survived for many generations; they are inherently sustainable having been, in most cases, well-constructed from high-quality, locally sourced materials. Their embodied energy (i.e. the energy expended and encapsulated within the fabric of a building in its construction) means that it is logical to retain and reuse them with sensitive and careful management. Given the ever-increasing challenges presented by the climate emergency, there is a need to ensure all our buildings, whether historic or modern, are more energy efficient. Applicants are strongly encouraged to consider strategies for saving energy in historic buildings whilst avoiding any potential damages to the structure or heritage value, or impacting the setting of, historic buildings. Each proposal will be assessed on a case-by-case basis, and depending on the significance of an asset, different levels of change may be appropriate in different types of buildings. Any strategies or technologies that don't harm the building's heritage value should be maximised. There are often simple and inexpensive measures to reduce energy consumption, such as reinstating existing and missing shutters and draught-proofing windows and doors through the use of sympathetic secondary glazing. Government regulations, research by Historic England as well as Building Regulations all suggest that substantial energy savings can be achieved without harming the heritage value of a building. For further information and guidance see Historic England's guidance on "Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency 2018" and "Energy Efficiency and Traditional Homes 2020".

20.37 It is acknowledged that some proposals may require residential development to support the restoration and reuse of designated heritage assets; however, such proposals 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.

20.38 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.

Policy 30

Non-designated Heritage Assets

A. 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, locally listed historic parks and gardens and other local historic features.

B. There will be a presumption against the demolition of Buildings of Townscape Merit.

20.39 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), locally listed historic parks and gardens, industrial sites and water courses, 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.

20.40 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 Buildings of Townscape Merit SPD adopted 2015 sets out the criteria that will be taken into account when considering whether a building or structure should be designated as BTM. This policy sets out a presumption against the demolition of BTMs unless structural evidence has been submitted by the applicant, and independently verified at the cost of the applicant. 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 Conservation Area Appraisals, the Urban Design Study and 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.

20.41 In addition to the borough's 14 Historic Park and Gardens that are on the Historic England Register of Historic Parks and Gardens (see Policy 29 on Designated Heritage Assets), there are a number of historic parks and gardens that merit local listing due to their historic interest. The Council will use the London *Historic Parks and* Gardens Trust Inventory as a basis for considering locally listing such parks and gardens in the borough.

20.42 Applicants will be required to:

1. retain the character of Buildings of Townscape Merit, war memorials, locally listed historic parks and gardens, and any other non-designated heritage assets;

2. submit a Heritage Statement to 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.

Policy 31

Views and Vistas

A. The Council will protect the quality of the identified 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. require development to avoid harm to the quality of the views and vistas as identified on the Policies Map, and for any proposal affecting a designated/identified view/vista on the Policies Map demonstrate this through the submission of computer-generated imagery (CGI) and visual impact assessments as required by Policy 44 'Design Process';
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, and reflect the relevant character area design guidance in the Urban Design Study;
4. require development to avoid harm to the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background;
5. seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured;
6. seek improvements to views within Conservation Areas, which:

    a. are identified in Conservation Area Statements and Studies and Village Plans;
    b. are within, into, and out of Conservation Areas;
    c. are affected by development on sites within the setting of, or adjacent to, Conservation Areas and listed buildings.

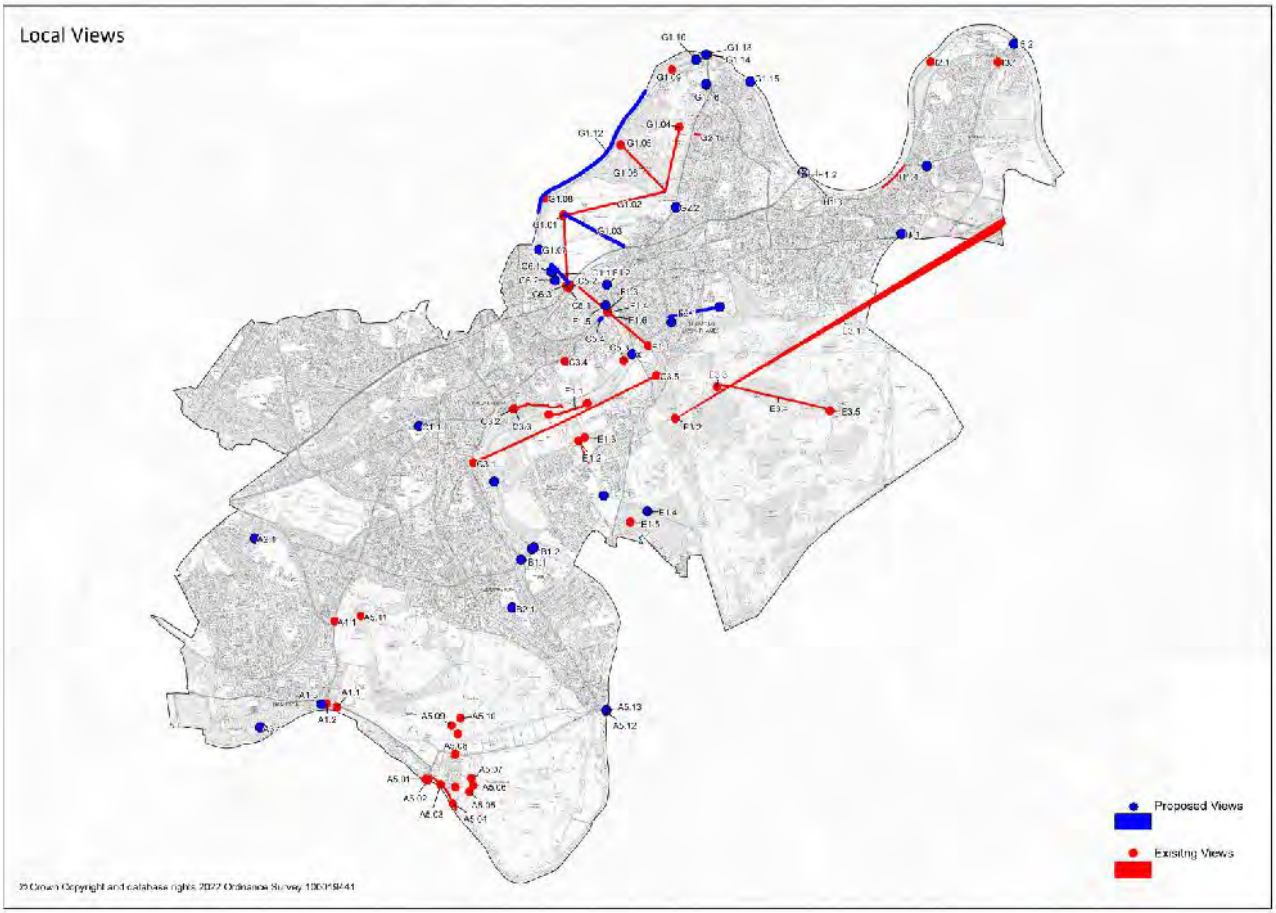
Policies Map designations

The existing views and vistas identified on the Policies Map will be retained. The Urban Design Study and further analysis identified additional local views which were consulted upon in a Local Views SPD. These additional views are listed below, along with those raised in consultation responses which it is considered appropriate to designate, and will be designated through the preparation of this Plan.

- Hampton Court Road/ Thames Street (A308) towards Hurst Park (east) (see draft SPD)
- Longford River (see draft SPD)

- Platt's Eyot pedestrian bridge (see draft SPD)
- Kingston Bridge (north) (see draft SPD)
- Ferry Road (see draft SPD)
- Teddington Lock Footbridge (see draft SPD)
- Udney Park Playing Fields (see draft SPD)
- May Road (see draft SPD)
- Richmond Road, East Twickenham (see draft SPD)
- St Margarets Riverside (see draft SPD)
- Ham War Memorial (see draft SPD)
- Thames Young Mariners
- Ham Common from Ham Avenues
- Richmond Green (see draft SPD)
- Richmond riverside (northern bank) (see draft SPD)
- Church of St Matthias (see draft SPD)
- Buccleuch Gardens towards Richmond Bridge
- King's Observatory towards Richmond Town Centre (see draft SPD)
- Gordon House, St Margarets Road (see draft SPD)
- London Museum of Water and Steam, Brentford (see draft SPD)
- Old Deer Park riverside (see draft SPD)
- Kew Bridge (west) (see draft SPD)
- Strand on the Green (see draft SPD)
- Parish Church of St Anne, Kew Green (see draft SPD)
- Kew Road towards the Great Pagoda (see draft SPD)
- Chiswick Bridge (west) (see draft SPD)
- Church of St Matthias, from Chiswick Bridge (see draft SPD)
- Church of St Matthias, from East Sheen Cemetery
- Hammersmith Bridge from Barnes riverside (see draft SPD)
- Priests Bridge (see draft SPD)
- Barnes Pond from Church Road

Map 20.1 Local Views



20.43 The Council commissioned further analysis work to review the borough's views and vistas, alongside the Urban Design Study. The Urban Design Study sets out details of valued views and vistas, including the range of prospects, linear views, and townscape views, which are highly important including in the borough's riverside and open space settings. These are recognised in each character area profile, along with the design guidance strategy for each area. This further analysis has provided a baseline assessment of existing protected views and vistas, additional new locally important views that have been identified, as well as setting out opportunities to improve these. This forms the basis for a draft Local Views Supplementary Planning Document to clearly identify the protected views *which will be finalised following the adoption of the Local Plan*.

20.44 The quality and character of the views and vistas as shown on the Policies Map will need to be protected.

20.45 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.

20.46 Applicants will be required to provide visualisations of the impact on views of proposals from agreed viewpoints with planning applications for major developments, as set out in Policy 44 Design Process. These

Accurate Visual Representations (AVRs) will form part of the Townscape and Heritage Impact Analysis. The use of 3D modelling such as VUCITY is advocated.

20.47 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 the relevant planning authorities in London, including the Greater London Authority. The London View Management Framework SPG will be used when considering applications affecting protected views. The view will be managed by following the principles of London Plan Policy HC4 London View Management Framework.

20.48 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.

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

20.50 Due to the unique natural and historic environment across the borough, there are many places with cherished local views, which can continually change and unfold, particularly seen in the riverside settings, around Greens and at a townscape level. If a local view is not designated, a development proposal would still be assessed against other relevant policies – such as the setting of designated heritage assets, river corridor and landscape designations, and wider local character and design considerations.

Policy 32

Royal Botanic Gardens, Kew World Heritage Site

A. The Council will protect, conserve, promote and where appropriate enhance the Royal Botanic Gardens, Kew World Heritage Site (WHS), its buffer zone and its wider setting. In doing this, the Council will take into consideration that:

1. The World Heritage Site inscription denotes the highest significance to the site as an internationally important heritage asset.
2. The appreciation of the Outstanding Universal Value of the site, its integrity, authenticity and significance, including its setting (and the setting of individual heritage assets within it) should be protected from any harm.
3. Appropriate weight should be given to the current Royal Botanic Gardens, Kew World Heritage Site Management Plan.

20.51 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.

20.52 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 International Council on Monuments and Sites (ICOMOS) method of Heritage Impact Assessment for World Heritage Sites as well as the London Plan and the Mayor of London's SPG on London's World Heritage Sites will be taken into account when assessing proposals. 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:

1. The designated WHS, as shown in the figure below ('Core Area');
2. The defined buffer zone, as shown in the figure below ('Buffer Zone'); and
3. The wider and more extensive setting of the WHS, including views to and from the site.

Map 20.2 Royal Botanic Gardens, Kew

20.53 The Royal Botanic Gardens, Kew World Heritage Site Management Plan provides 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.

20.54 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. A number of locally important views are identified in Policy 31 Views and vistas and on the Policies Map.

Policy 33

Archaeology

A. 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. This is in accordance with London Plan Policy HC1 Heritage conservation and growth.

B. 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.

20.55 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.

20.56 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 adviser and should be consulted with regard to archaeological matters*, at an early stage of proposals particularly with regard to place-making and public benefit opportunities*.

20.57 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 have been reviewed by GLAAS as part of a rolling programme of reviews across London. This moves to a 'tiered' system which distinguishes those

areas which are most significant and sensitive to change from those which, although still of interest, are not quite so vulnerable. Tier 1 APAs help to identify where undesignated archaeological assets of equivalent significance to a scheduled monument – and which are subject to the same policies as designated heritage assets – are known or likely to be present. A total of 31 Archaeological Priority Areas are identified for Richmond, of which 7 are a Tier 1 APA, 24 are Tier 2 APAs, and 1 is a Tier 3 APA. The report by GLAAS was completed in 2022 and there is a link to the latest Archaeological Priority Areas Appraisal and borough-wide overview maps on the Council's website.

21 Increasing biodiversity and the quality of our green and blue spaces, and greening the borough

Policy 34

Green and Blue Infrastructure (Strategic Policy)

A. Green and blue infrastructure is a network of multi-functional green spaces and green features, green space stepping-stone sites as well as rivers and other watercourses, ponds, floodplains and wetlands, which provides multiple benefits for people, nature and the economy, and which plays a significant role in both mitigating and adapting to climate change.

B. To ensure all development proposals protect and appropriately enhance and restore green infrastructure, the following will be taken into account when assessing development proposals:

1. Protect and enhance the borough's blue and green infrastructure networks, in particular, but not exclusively, the sites designated as Green Belt, Metropolitan Open Land, Local Green Space, Other Open Land of Townscape Importance, other open spaces as well as areas designated for their biodiversity and nature conservation value.
2. Protect and seek improvements to walking and cycling routes to and through the green infrastructure network, such as green spaces, and where opportunities arise create such routes, thereby promoting healthy lifestyles and active travel.
3. Enhance the existing blue and green infrastructure network, including open spaces and green corridors, providing habitats for biodiversity to flourish and expand.
4. Protect and enhance biodiversity within the green and blue infrastructure networks, particularly on sites designated for nature conservation interest, but also recognise the contribution that non-designated sites offer to increase biodiversity in the borough.
5. Increase the provision of green and blue infrastructure in and around development sites through urban greening and other green and blue infrastructure features, ensuring they complement the surroundings and link into existing networks.
6. Expect development to incorporate and maintain appropriate elements of green infrastructure which make a positive contribution to the wider network of open spaces.

7. Enhance accessibility to open spaces as well as to the blue infrastructure network, particularly to the borough's rivers and their banks, for recreational use, while ensuring that the biodiversity value is protected and enhanced in a measurable way.
8. Improve opportunities for local residents and visitors to experience nature and provide educational opportunities, both formal and informal, within the development, to allow the public to embrace their local environment and develop potential stewardship behaviours.
9. Make provision for the long-term sustainable maintenance and management of open space and green and blue infrastructure features on site, including supporting community involvement in stewardship of green and blue infrastructure networks, and ensuring there is space for growing food, including pollination and wildlife-friendly gardening.

21.1 This policy is the overarching strategic policy for the theme "Increasing biodiversity and the quality of our green and blue spaces, and greening the borough" and should be read alongside other policies in this Plan as well as the London Plan, particularly Policy G1 (Green infrastructure) and Policy G4 (Open space), the Mayor of London's All London Green Grid SPG (2012) (including the Frameworks for the Arcadian Thames, and the River Colne and Crane Area) and guidance set out in the Colne and Crane Valleys Green Infrastructure Strategy (2019). Urban greening entails more than just focusing on how the streets, buildings and other public spaces look. Roofs and walls covered in plants, street trees and small pocket parks in between buildings make our borough an even better place to live, work and invest. These green features act as part of the borough's green infrastructure network to help clean our air, reduce the risk of flooding and keep the city cool.

21.2 The borough is characterised by extensive areas of open land, designated as Green Belt and Metropolitan Open Land. The borough's rivers and their corridors link across borough boundaries and have a strategic function in southwest London, Greater London and beyond. The borough also benefits from highly significant historic landscapes, including those on the Historic England's national Register of Parks and Gardens, all of which make a significant contribution to the borough's green infrastructure network. 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, such as residential gardens. Therefore, the green spaces and green and blue features that contribute to and make up the overall green infrastructure network range from borough-wide and strategic features such as parks, watercourses and woodlands to local features such as playgrounds, sports pitches, allotments, public open spaces, trees, woodlands, private gardens and other green spaces used for recreational purposes. There are also other features 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. 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 a green lung for southwest London.

21.3 As set out in the Local Plan's spatial strategy (see Policy 2 'Spatial Strategy: Managing change in the borough (Strategic Policy)'), housing delivery and the infrastructure required to support it, is expected to be met without compromising the green and blue infrastructure network; there is a presumption against the loss of, or building on, greenfield sites. The leisure and recreational pressure on existing green infrastructure, including nationally and internationally designated areas such as Richmond Park and Bushy and Home Park, is acknowledged, and residential development is likely to exacerbate this pressure. There will be challenges in ensuring that the Council reaps all the benefits of having high quality, well maintained open

spaces and green infrastructure. The Council will work in partnership with key local stakeholders and partners (such as the Environment Agency, Mayor of London, neighbouring boroughs, the Royal Parks, major landowners such as the Crown Estates, Thames Water the Richmond Biodiversity Partnership, Habitats & Heritage, the Thames Landscape Strategy, the Thames Strategy and others) to ensure through careful management we achieve our shared aims in respect of the quantity, quality and positive impact of our green and blue assets for both people and wildlife.

21.4 Development which provides a greener environment can be more sustainable and deliver important environmental, social, health and economic benefits. The multifunctional nature of green and blue infrastructure means it contributes significantly to the value of the local area as a place to live, work, do businesses and visit. With the decline of biodiversity across the globe, it is vitally important that new features do not only offer a 'green space' but provide value by forming part of a larger ecosystem, helping to maintain biodiversity. For example, green corridors can be safeguarded for biodiversity by carefully considering any physical infrastructure installed, such as reducing the extent of artificial lighting where possible to protect species of bat present in the borough (see Policy 39 'Biodiversity and Geodiversity' and Policy 43 'Floodlighting and Other External Artificial Lighting '). Policy 8 'Flood Risk and Sustainable Drainage (Strategic Policy) ' also sets out that the Council encourages the return of currently engineered riverbanks to a more natural state where this is possible, which will in turn improve the quantity and quality of natural habitat in these locations. Green and blue infrastructure plays a significant role in both mitigating and adapting to climate change, with the ability for green infrastructure to capture and sequester carbon and pollutants within the vegetation and soils being perhaps the most crucial.

21.5 Green and blue infrastructure networks and features that make up the overall network can also support healthier and more active lifestyles by providing green routes for walking and cycling, green spaces for recreation, exercise and play. Pedestrian and cycle routes across green spaces often form a strategically important part of the borough's cycling and walking. These routes enable active travel choices by connecting key destinations in the borough via convenient shortcuts and quiet routes away from busy roads. The coronavirus (COVID-19) pandemic has highlighted the importance of having access to green spaces within walking distance of homes. Pedestrian and cycle routes through green spaces should be protected and, wherever possible, provided to a high standard in accordance with best practice guidance. During the COVID-19 pandemic, visits to parks and other green spaces increased across London. It is important to protect and enhance the existing areas of open space in the borough, to ensure that as the population grows, there are good quality green spaces for everyone to enjoy.

21.6 The borough's network of green and blue infrastructure is critically important in helping to mitigate and adapt to the effects of climate change within the borough, given that areas of open water within the borough's river corridors, other wetland habitats and green spaces help to reduce the urban heat island effect by promoting urban cooling and reducing localised air temperatures. Green space areas also provide important storm water retention opportunities by minimising surface water run-off rates during severe rainfall storm events, and trees within the borough's green and/or wildlife or ecological corridors help promote urban cooling. Trees also provide increased shade cover during summer heatwaves and reduce levels of particulate urban air pollution. They also play a key role in helping to store carbon. Rising summer temperatures, prolonged summer heatwaves, and flash flooding due to severe extreme storm events are all likely to increase in frequency in London over the coming years as a result of climate change. 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. The appropriate enhancement and protection of the borough's green and blue infrastructure networks is therefore considered critical in tackling the climate emergency.

21.7 Green corridors are linear natural infrastructure, containing trees and plants, that link to other typically larger green and open spaces to form a green infrastructure network. In order to make the borough more resilient to future climate change pressures and at the same time deliver measurable net gains for biodiversity (see Policy 39 'Biodiversity and Geodiversity'), the Council will encourage the creation of multi-functional green space wildlife or ecological corridors within new development site layouts which have a dual function as natural green space areas and also areas which help to mitigate the effects of climate change by promoting both sustainable urban drainage and urban cooling. For example, by encouraging the use of on-site natural green space, linear shaped dry swale Sustainable Urban Drainage Systems (SuDS), wildlife or ecological corridors, which incorporate areas of new tree planting.

21.8 Education about green infrastructure, particularly in urban areas where ecosystem services are intertwined with human development, can include fundamental lessons about systems thinking, sustainability, and resilience. Therefore, developments should provide both formal and informal education opportunities within the site, such as through signage or information boards, or on large-scale developments through space for walks or outdoor education as well as spaces for growing food. This will allow the public to embrace their local environment and promote awareness on the benefits of green infrastructure, growing food and the importance of pollination and wildlife-friendly plants, thereby increasing public support, management, and stewardship of present and future green infrastructure projects.

21.9 Green infrastructure requires long-term management and maintenance, which should be considered at the earliest stages of design and planning. Outreach and education are fundamental to ensuring and preserving long-term benefits, particularly in relation to biodiversity conservation efforts. Management plans need to be flexible to accommodate changing needs of green infrastructure features, and management demands are likely to decrease once green infrastructure features and/or habitats have settled and established.

Policy 35

Green Belt, Metropolitan Open Land and Local Green Space

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

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

C. 'Very special circumstances' must result in the improvement and enhancement of the openness, character and use of the Green Belt and Metropolitan Open Land. Measures could include improvements or enhancements to landscape quality (including visual amenity), biodiversity (including delivering biodiversity net gain) or accessibility.

D. When considering developments on sites in proximity to Green Belt or Metropolitan Open Land, any possible visual impacts on the character, local distinctiveness, and openness of the Green Belt or Metropolitan Open Land will be taken into account.

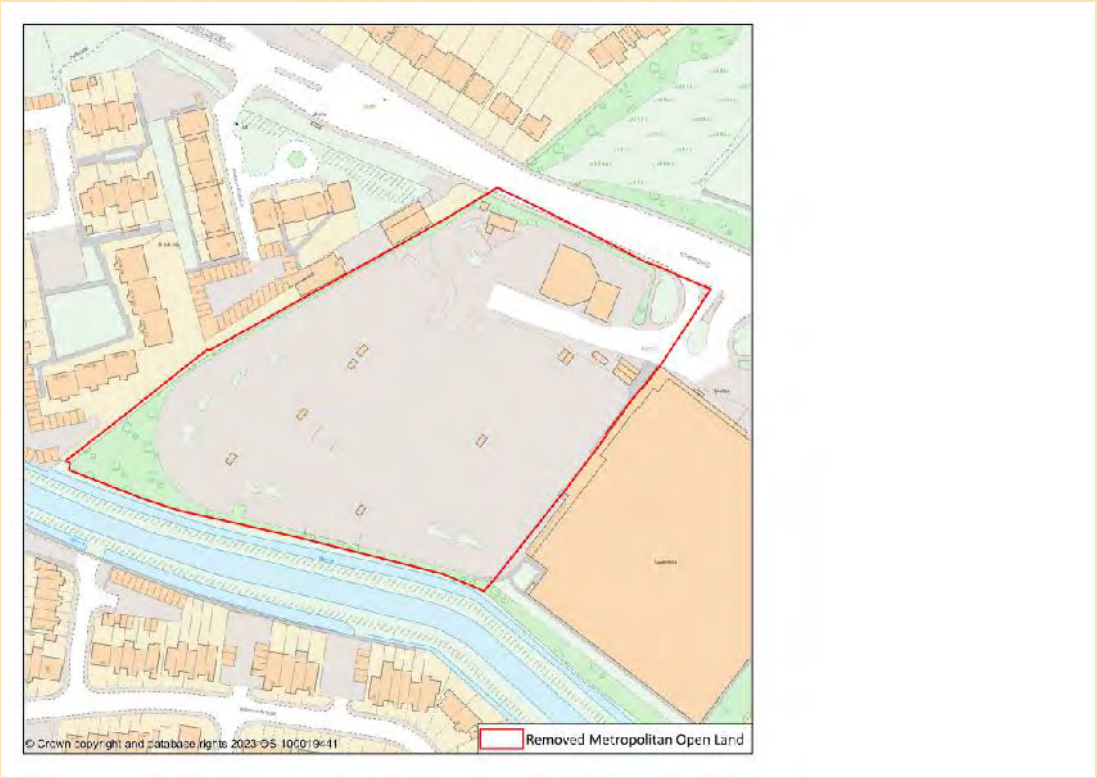
Local Green Space (LGS)

E. Local Green Space, which is demonstrably special to a local community and which holds a particular local significance, will be protected from inappropriate development that could cause harm to its qualities.

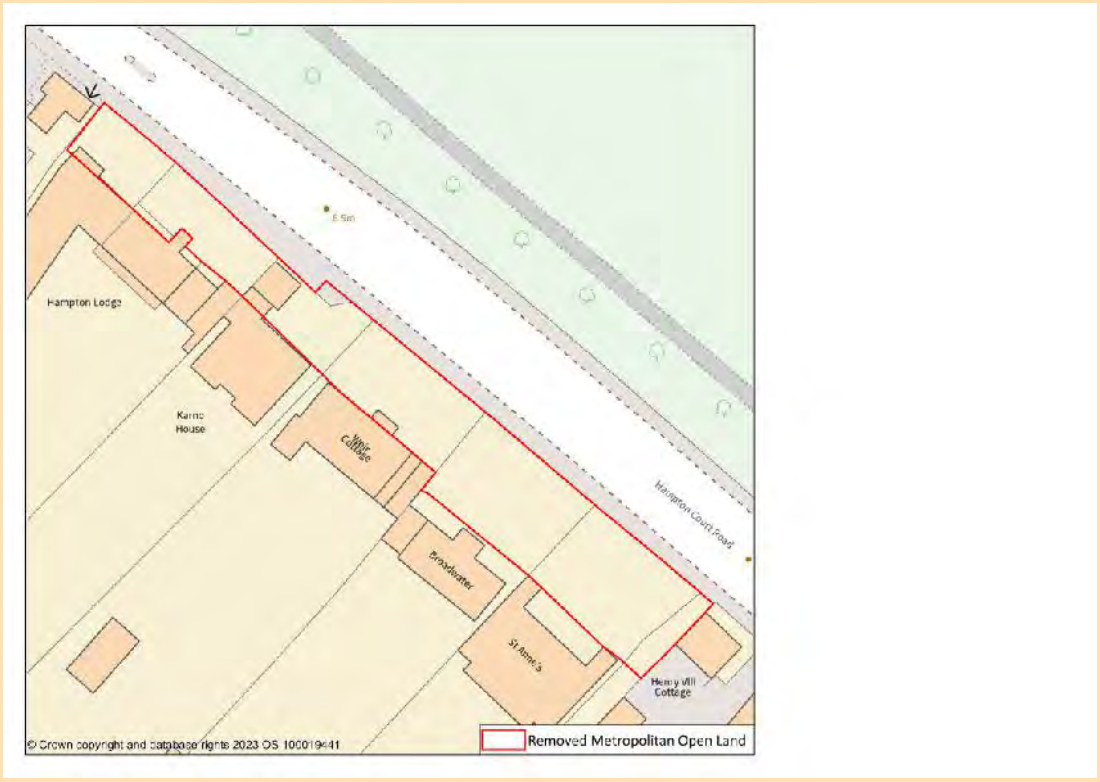
Policies Map designations

A. Further to the recommendations in the Open Land Review (Green Belt, MOL, LGS and OOLTI), on the following sites their MOL designation has been removed.

1. Carpark for Sainsburys, Uxbridge Road, Hampton (see Statement Site Allocation 4 'Car Park for Sainsburys, Uxbridge Road, Hampton')



2. Parcel 48 of the Review: Front Gardens Hampton Court Road (East) - The parcel is a very small linear section comprising front gardens to residential properties along Hampton Court Road.



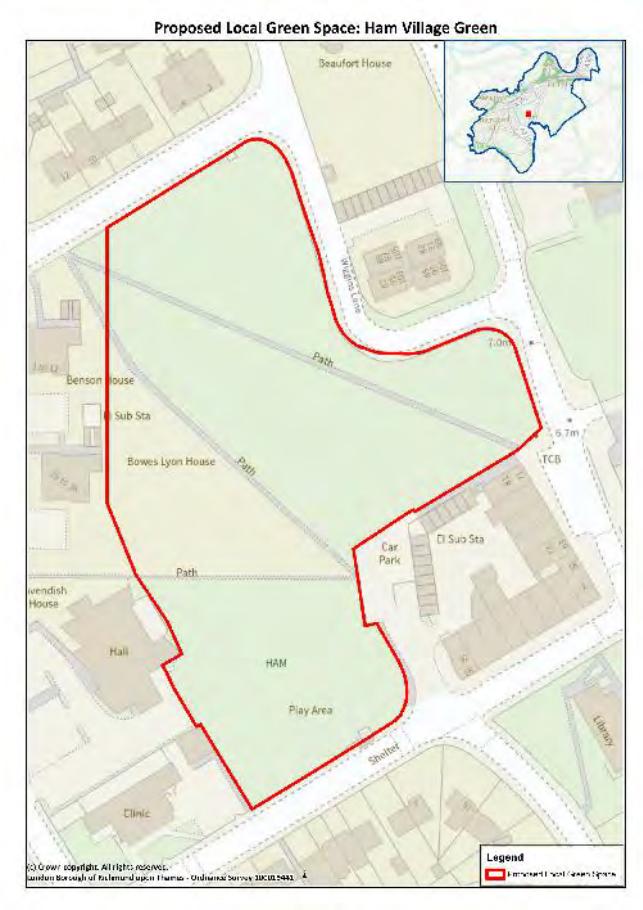
3. Parcel 49 of the Review: Front Gardens Hampton Court Road (West) - The parcel is a very small linear section comprising front gardens to residential properties along Hampton Court Road.

B. Further to the recommendations in the Open Land Review (Green Belt, MOL, LGS and OOLTI), the following site(s) have been added as LGS:

1. North Sheen Recreation Ground

2. Raleigh Road Recreation Ground

3. Ham Village Green



4. Ham Library Gardens

5. Pensford Field Kew

6. Warren Gardens

21.10 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. 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 137 – 151 of the *September 2023* NPPF ~~2021~~ */ paragraphs 142 - 156 of the December 2023 NPPF* and any future amendments on Green Belts applies equally to MOL.

21.11 MOL is open land or water, either publicly or privately owned, with or without public access. MOL, as shown on the Policies Map, plays an important strategic role as part of the borough and London's multi-functional green infrastructure network and improvements in its overall quality and accessibility are encouraged, including for a range of users. Green corridors, 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.

21.12 National and regional policies, including this policy, apply to the borough's areas designated as Green Belt [(6)] as shown on the

6 *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*

Policies Map. National guidance sets out the functions of the Green Belt, its key characteristics and acceptable uses.

21.13 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, it is also recognised that there may be exceptional cases where inappropriate development could be acceptable, such as cycle storage or small scale structures for essential utility infrastructure. Water, wastewater 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.

21.14 A review of all the land designated as Green Belt, MOL, LGS and OOLTI was carried out, providing an up to date, objective and evidence-based assessment of how the currently protected areas contribute to the purposes / criteria set out in the relevant national/regional or local policy guidance. The Open Land Review (Green Belt, MOL, LGS and OOLTI) (2021, and Errata 2023) found that the Green Belt in the borough scored well against the criteria for its designation in the NPPF; therefore, no change is proposed to Green Belt boundaries. The Review demonstrated that eleven MOL sites did not score as highly against the London Plan MOL criteria. Out of these eleven sites, three fulfil an important ecological purpose, acting as green corridor and linking green spaces; due to their value to the borough's green infrastructure network, the MOL designation is retained for these sites. The Review also demonstrated that a small number of sites have been deliberately mismanaged to try and reduce their value and purpose of MOL; however, this is not a reason to amend or remove their designation. The Review identified two relatively small linear parcels comprising front gardens to residential properties along Hampton Court Road; these are recommended to be removed from MOL. In addition, the Review has identified that one site, i.e. Carpark for Sainsburys, Uxbridge Road, Hampton, scored weakly against all the criteria for MOL designation; the Council proposes to release this from MOL and allocate for 100% on-site affordable housing (see Site Allocation 5). In accordance with the NPPF and London Plan, any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL as set out in the London Plan.

21.15 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.

21.16 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

separate from and in addition to any requirements for planning permission. Most of this land is protected in the Borough's Local Plan and London Plan by its designation as Metropolitan Open Land under Policy 35 and Policy G3 respectively. However, it is not covered by any planning policy Green Belt designation in the terms described by the NPPF, London Plan and Local Plan.

demonstrate this as part of the justification that 'very special circumstances' may exist.

21.17 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.

21.18 Local Green Space, identified on the Policies Map, is green or open space which has been demonstrated to have special qualities and hold particular significance and value to the local community which it serves. New areas of Local Green Space can only be designated when a plan is being prepared or reviewed. Udney Park Playing Fields was designated as LGS in 2020. The Open Land Review (Green Belt, MOL, LGS and OOLTI) (2021, and Errata 2023) assessed and identified a number of potential sites for consideration as LGS. Whilst some of the assessed sites may qualify for LGS designation, where there is already an existing MOL designation, there would be little to no additional benefit gained by a LGS designation. The Council has taken forward those sites which have scored strongly overall against the LGS criteria set out in the NPPF, and which do not already benefit from an MOL designation. The sites designated as Local Green Space are as follows:

1. North Sheen Recreation Ground
2. Raleigh Road Recreation Ground
3. Ham Village Green
4. Ham Library Gardens
5. Warren Gardens
6. Pensford Field Kew

21.19 In line with the NPPF, managing development within a Local Green Space should be consistent with policy for Green Belt. Development, which would cause harm to the qualities of the Local Green Space, will be considered inappropriate and will only be acceptable in very special circumstances where benefits can be demonstrated to significantly outweigh the harm.

21.20 The following criteria are taken into account when defining Local Green Space:

1. The site is submitted by the local community;
2. There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;
3. The site is not land allocated for development within the Local Plan;
4. The site is local in character and is not an extensive tract of land.

Policy 36

Other Open Land of Townscape Importance (OOLTI)

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

B. In addition to permitted development rights, 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:

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 of, or minor extension to, existing built facilities; and
3. It does not harm the character or openness of the open land.

C. 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. Where appropriate,

the Council will encourage measures to restore its green space quality and character, and deliver appropriate and positive measurable Biodiversity Net Gain enhancements.

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

Policies Map designations

A. Further to the recommendations in the Open Land Review (Green Belt, MOL, LGS and OOLTI), the following site has been added as OOLTI:

- Triangle of grass at Ellerman Avenue

B. In addition, a duplication of an OOLTI at the following site has been removed, leaving the correct designation in place:

- Harlequins Site, Twickenham

21.21 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. New areas for OOLTI designation can only be identified when a plan is being prepared or reviewed. The existing designated areas are shown on the Policies Map.

21.22 A review of all the land designated as Green Belt, MOL, LGS (see Policy 35 'Green Belt, Metropolitan Open Land and Local Green Space ') and OOLTI was carried out, providing an up to date, objective and evidence-based assessment of how the currently protected areas contribute to the purposes / criteria set out in the relevant national/regional or local policy guidance. The Open Land Review (Green Belt, MOL, LGS and OOLTI) (2021, and Errata 2023) found that most of the OOLTI sites scored moderately or strongly overall, and therefore no changes to existing OOLTI designations are proposed. The Council is however taking forward the designation of one new OOLTI site.

21.23 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, also for their importance and value to biodiversity (see Policy 39 'Biodiversity and Geodiversity').

21.24 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.
- 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 34 Green and Blue Infrastructure.
- Value for biodiversity and nature conservation and meets one of the above criteria.

21.25 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.

21.26 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.

Policy 37

Public Open Space, Play, 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.

B. Existing open space, play space, sports and recreational buildings and land, including playing fields, should not be built on unless:

1. an assessment has been undertaken which has clearly shown the facility, open space, buildings or land to be surplus to requirements; or
2. 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
3. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

C. 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. In addition, green open spaces are especially important for biodiversity and the improvement of wildlife or ecological corridors as well as contribute in reducing the likely effects of climate change. Furthermore, the provision of new open spaces and actively encouraging new users and visitors to utilise these spaces will alleviate recreational pressures on sites designated for biodiversity.

Impacts on existing provision and requiring new provision

D. The Council will require all major development proposals in the borough to meet the Public Open Space, play space, and playing fields and ancillary sport facilities needs arising out of the development by requiring the following:

Public Open Space

1. 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. Major developments will be required to provide new on-site open space in areas of Public Open Space deficiency, as shown in the Policies Map. This will be required in addition to any external amenity space.
3. Major developments outside of areas designated as Public Open Space deficient will need to provide on-site open space where feasible. Should such provision not be feasible, a payment in lieu will be sought as a planning obligation to enable the provision of new off-site open space, or improvements to the accessibility or quality of existing Public Open Space in the vicinity of the development. Planning obligations will also be sought towards management and maintenance of new or improved off-site open space.
4. Any new Public Open Space provided as a result of new development should deliver multi-functional benefits, including for nature conservation and biodiversity value as well as for the health and wellbeing of future occupants and surrounding local communities.

Play space

5. 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 GLA's child yield calculator as advised 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 areas and neighbourhoods. Therefore, new dedicated on-site play space should be made publicly accessible by all.
6. New play space should be well located within a site, away from sources of pollution; be of sustainable construction; and cater for a range of different ages and abilities. The local community and particularly local children should be engaged in the design of the play space.

Playing fields and sport facilities

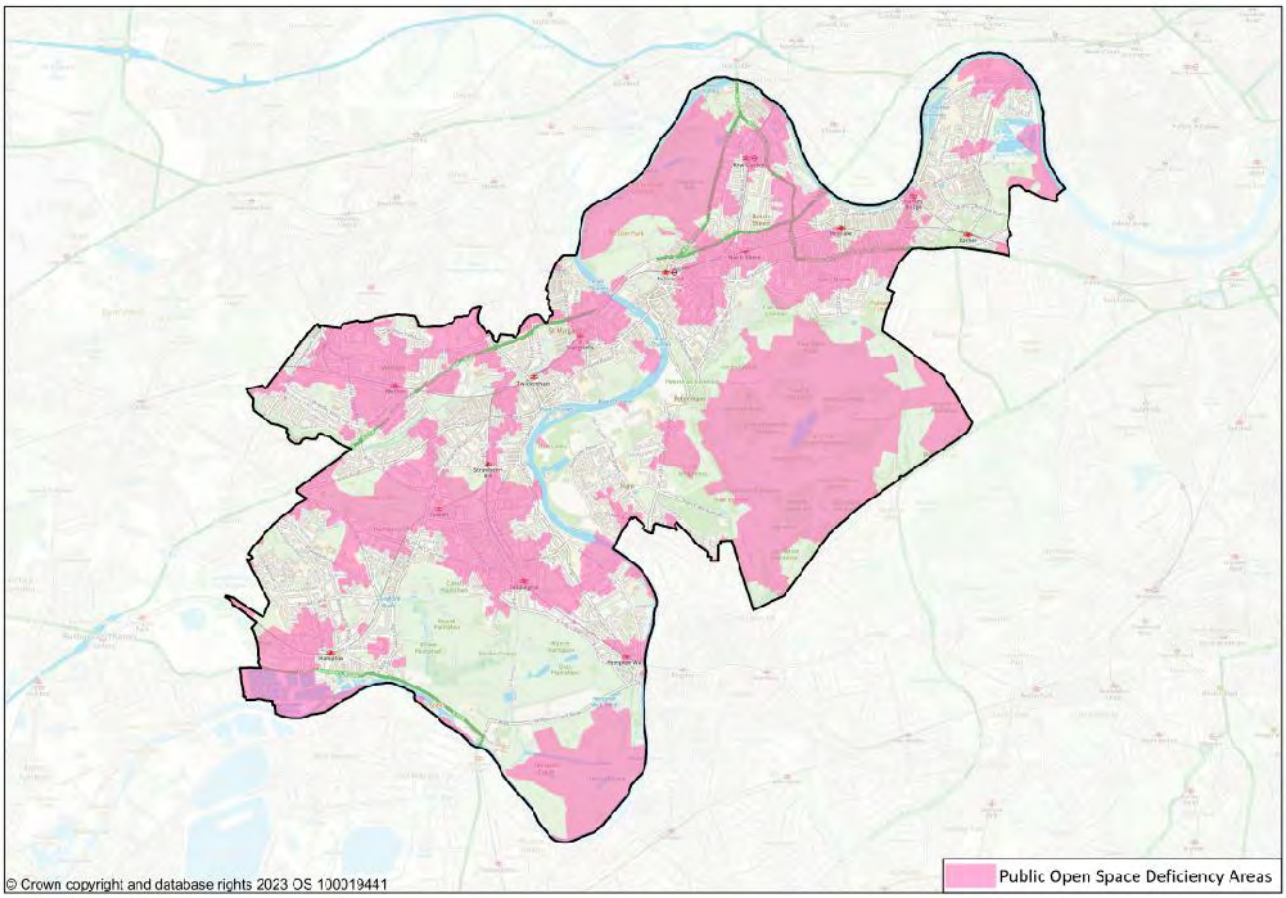
7. Applicants should assess the need and feasibility for on-site provision of new playing fields, artificial grass pitches (AGP), and ancillary sport facilities in line with the borough's Playing Pitch Strategy.
8. Where on-site provision of play space or new playing fields and ancillary facilities is 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 or existing playing fields and associated sport facilities. To address impacts arising, a Community Use Agreement will be required to secure wider community access, where relevant. 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.

Policies Map Designations

Update the Public Open Space deficiency areas to reflect the Open Space Assessment 2023:

(note shading within large sites such as Richmond Park etc should be ignored)

Map 21.1 Public Open Space Deficiency Areas



Amend the Public Open Space designation at Heathfield Recreation Ground to add the eastern strip:

21.27 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. An update to the Open Space Assessment was published in April 2023. The Playing Pitch and Outdoor Sports Assessment and Strategy ~~is being reviewed and will be~~ *has been* updated in 2023. 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.

21.28 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.

21.29 Richmond Public Health has published a Physical Activity Plan 2021-2031, which seeks to increase opportunities for physical activity within the Borough. 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. The emphasis is on enabling people to fit physical activity into their daily lives, including promoting active travel as a form of travel to and from leisure and fitness activities, as part of the approach set out in Policy 1 'Living Locally and the 20-minute neighbourhood (Strategic Policy)'. Parks and open spaces are particularly important in promoting activity in young children, thereby targeting the increasing childhood obesity levels in the borough. Culture Richmond 2021 to 2031 sets out that the Council will work with our borough's wide range of sports clubs and facilities to maintain high levels of participation amongst young people and consider how our partners can help get more residents more active. Easy access for all residents to 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

21.30 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. In areas identified as being deficient in Public Open Space, as shown on the Policies Map, there is a requirement for new major developments to provide new on-site open space to alleviate the recreational pressures arising from future occupants and users on existing open spaces while also providing new space for nature and biodiversity. Providing new open spaces as part of development would mitigate potential impacts of likely increased visitor and user numbers of existing established open spaces and parks designated for biodiversity purposes, such as Richmond Park or Wimbledon Common Special Area of Conservation, thereby retaining their integrity as wildlife sites.

21.31 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. Regardless of the type of open space provision, it should be designed with nature conservation and

biodiversity benefits in mind, thereby delivering biodiversity net gain and addressing the requirements of Policy 39 'Biodiversity and Geodiversity' of this plan.

21.32 While it is acknowledged that this borough has a range of existing public open spaces, due to the increased cumulative recreational pressures from new development and population growth, all new major development in areas of Public Open Space deficiency will be required to provide new on-site open space.

21.33 Areas of Public Open Space deficiency, as identified on the Policies Map, are derived by applying a 400 metre buffer area to designated Public Open Space. Catchment mapping should be treated as an approximation as it does not take account of topography, and it may be appropriate to consider if a distance is on an incline or decline.

21.34 New major developments will lead to increases in usage and are therefore highly likely to 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.

21.35 Major developments in Public Open Space deficiency areas will be required to provide new on-site open space. For all other major developments, 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 2023, and informed by the Fields in Trust guidelines, the following accessibility standards will be applied for assessing travel to open space provision from new development sites:

- 9-minute walk time (710m) - for Parks and Gardens
- 9-minute walk time (710m) - 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)

21.36 It is acknowledged that on-site provision may not be feasible or practicable on occasions, 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

21.37 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 2023, the borough is generally well served with play spaces that are of high quality.

21.38 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 GLA's child yield calculator as advised 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.

21.39 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.

21.40 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.

21.41 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

21.42 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, along with their supporting ancillary facilities such as pavilions providing changing rooms and storage, 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. The Playing Pitch and Outdoor Sports Assessment and Strategy 2023 highlights increasing demand in a number of sports and a need to make better use of new and existing sites. Monitoring the Playing Pitch Strategy is undertaken at least annually in the form of publishing updated Action Plans, usually every 6 months, to monitor the delivery of recommendations and highlight emergent issues and opportunities.

21.43 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.

21.44 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 must 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, as well as, the provision of wider public benefits, including public access, therefore enabling and promoting physical activity and encouraging healthier lifestyles and habits for all ages.

21.45 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, which can bring benefits to both the host creating vibrant community hubs as well as benefits for user groups and individuals. Community use agreements will be sought to secure community access, that is accessible and affordable, particularly where this will address impacts arising out of a development. An agreement will include how opportunities for wider community access will be managed and maintained, as set out in the supporting text to Policy 49 'Social and Community Infrastructure (Strategic Policy)'. This should include details of the facilities available (including ancillary provision e.g. changing rooms) and how access will be managed (for both clubs and/or individuals), the hours and days available/unavailable, any particular needs the proposal will be catering for (e.g. women's or juniors), affordable pricing, and whether provision is floodlit (where applicable to the site). These details will be required as part of an application, to provide certainty and enable a detailed consideration of the benefits of any community use to be assessed as part of the determination of an application. For example,

for clubs to benefit there needs to be regular access throughout the year. There should be early discussions with the Council's Sports and Fitness Services, and as appropriate National Governing Bodies of Sport along with Sport England, to ensure the community use will achieve sporting and public health outcomes. There is a recognition that for both the provider and the Council, needs and priorities can change over time, and the agreement should set out a mechanism for periodic review and monitoring, such as an annual review, to ensure benefits are maintained in future.

21.46 Where a proposal involves the relocation of a playing field, the applicant must detail the exact timing of when the new playing field will be relocated to minimise lost playing time. For larger developments, it is expected that the playing field would be constructed first in the development and the phasing of re-provision will be secured in a legal agreement.

21.47 For some sports, artificial grass pitches (AGP) can assist in making the best use of sites, where they can provide reliable quality to enable intensive play, irrespective of extreme weather. However, an assessment would need to be made of the benefits as well as the potential harmful impacts, such as on surface water drainage, biodiversity and noise. Sports lighting is likely to form part of the justification for investing in an AGP as the viability is enabled by the additional hours of play, and would be assessed against Policy 43 'Floodlighting and Other External Artificial Lighting ' which enables consideration as to whether it will meet an identified need set out in the Council's Playing Pitch Strategy. In line with the Circular Economy requirements of Policy 7 'Waste and the Circular Economy (Strategic Policy)' applications for a new or replacement AGP or 3G pitch must demonstrate that pitches being replaced are managed and materials disposed of in the most environmentally friendly way possible at the point of development, during maintenance, and the end of their lifecycle.

21.48 Indoor sport facilities are covered by Policy 49 'Social and Community Infrastructure (Strategic Policy)'.

Policy 38

Urban Greening

A. All development proposals should integrate green infrastructure and provide for urban greening. It is necessary to consider green infrastructure at an early stage of the design process and incorporate this as part of an integrated design approach.

B. Major developments are required to:

1. Conduct an Urban Greening Factor (UGF) assessment in accordance with the methodology set out in the London Plan;
2. Achieve an UGF of a minimum of 0.4 for developments that are predominantly residential;
3. Achieve an UGF of a minimum of 0.3 for developments that are predominantly commercial.

C. All other developments are required to include urban greening elements, although no UGF calculation has to be submitted. Applicants will be required to provide the following information:

1. Appropriate information which provides sufficient detail on the type(s) of green infrastructure proposed;
2. Justification indicating why the type(s) of green infrastructure have been proposed for the development;
3. The UGF calculation and score (for major developments); and
4. Appropriate information on how the urban greening elements will be maintained and managed over the lifetime of the development.

D. Any new urban greening element should focus on tackling the climate emergency and/or help avoid or mitigate the impacts of the proposed development on biodiversity by providing locally relevant greening that complements the site's existing wildlife value and that will achieve an overall gain in biodiversity.

Green roofs

E. Biodiverse green roofs should be incorporated into developments with roof plate areas of 100sqm or more, where technically feasible. At least 70% of any potential roof plate area should be used as a biodiverse green roof.
F. Developments proposing the installation of roof level solar technologies are required to incorporate the panels over a green roof area to form a 'bio-solar roof', where the overarching biodiversity and drainage functions of the green roof will not be adversely affected. Integrated solutions are available for both new build construction and retrofit projects, which would allow for the entire roof area to qualify as a green roof, and if a biodiversity vegetation finish is elected for, this can further enhance the BREEAM credit rating for the roof element (see Policy 6 'Sustainable Construction Standards ').
G. The onus is on an applicant to provide evidence and justification if a green roof cannot be feasibly incorporated.
H. Developments involving the extension of existing buildings are strongly encouraged to retrofit extensive green roofs on existing roof areas where feasible, in addition to providing green roofs on the extension where technically feasible.
I. The use of green walls is also encouraged and supported.

Urban Greening and Urban Greening Factor

21.49 Urban greening describes the incorporation of green infrastructure elements into a development, such as vegetation, trees, green roofs, green walls, hedgerows and water features. There can be multiple benefits to including these features in new development including tackling the climate emergency by providing carbon storage, improved biodiversity and habitat enhancements, improved physical and mental wellbeing, access to food growing and gardening, improved air quality, water attenuation, improved visual amenity and helping to address the urban heat island effect.

21.50 London Plan Policy G5 requires all major developments to include urban greening as a fundamental element of site and building design. The policy introduces the use of an Urban Greening Factor (UGF) to evaluate the quantity and quality of urban greening provided by a development proposal. It enables major developments to demonstrate how they have included urban greening as a fundamental element of site and building design, in order to meet London Plan Policy G5 Urban greening. A UGF calculator has been prepared to help applicants calculate the UGF score of a scheme and present the relevant information as part of their application.

21.51 The London Borough of Richmond upon Thames has not yet developed its own UGF, and therefore the minimum benchmarks in this policy may be subject to change in the future (such as through the development of an Urban Greening or similar SPD, based on local evidence and need). The benchmarks should be seen as minimum and not the maximum required.

21.52 The provision of urban greening can help to address other London Plan policies. However, the UGF tool should not be used to demonstrate compliance with these other policies as they will also need to be addressed in their own right.

21.53 Given the nature of Richmond borough and that the majority of development will come forward on small sites, it will be important that these sites also contribute to the provision of additional green infrastructure in the borough.

Therefore, planning applications submitted for small sites will need to incorporate urban greening on site and/or within the development. While there are many ways this can be done, three examples include creating greener front gardens, using capillary matting instead of hard standing for car parking areas and increasing the overall amount of vegetation on site.

21.54 Further guidance on the UGF is set out in the London Plan Policy G5 as well as London LPG on Urban Greening Factor (February 2023).

Green roofs

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

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

21.56 Green roofs must be considered at the earliest possible stage of designing a proposal to ensure their effective operation. They must be designed to:

1. maximise benefits for biodiversity, sustainable urban drainage, urban cooling and urban air quality enhancements;
2. promote ecological diversity including planting based on UK native species wildflowers and shrubs to help support native wildlife species, in line with priorities set out in the Richmond Biodiversity Action Plan;
3. achieve maximum biodiversity/climate change benefits by ensuring the depth of substrate/ soil on green roofs is between 80mm to 150mm in depth. Substrate depths below 80mm will only be considered acceptable in very exceptional circumstances where there is robust and credible evidence in place to demonstrate why minimum substrate depths cannot be delivered;
4. deliver measurable net gains for biodiversity and, where appropriate, balance this with the provision of multi-functional roof garden green space areas that may be accessible by occupiers of the building as well as the local community;
5. accommodate surface water storage during severe rainfall storm events to help minimise surface water run-off;
6. provide for long-term maintenance and management, including provisions for inspection and monitoring the quality of the green roof.

21.57 Biodiverse green roofs are the Council's clear priority in terms of green roof provision as these will play a more effective role in helping to tackle the climate emergency and help support biodiversity. The installation of intensive or semi-intensive green roofs to provide amenity space will only be acceptable where it is clearly demonstrated that this is required to meet other policy requirements, and where the primary biodiversity, sustainable drainage and cooling functions of the green roof will not be adversely affected. Dedicated areas of biodiversity-based planting must be maximised on intensive or semi-intensive green roofs and amenity space must not cover the majority of roof space.

21.58 Major developments are encouraged to consider tree planting and food growing opportunities within green roof designs where feasible.

21.59 High quality designs for living green walls incorporating vegetation over a building's vertical surface should also be considered in new developments. Vertical surface areas of proposed living green walls should be included in the UGF calculation but not be added to the site's total area. A green wall's efficacy depends on how it is constructed, operated and maintained, and it has to be ensured they are sustainable, through for example using drought-resistant and local plants as well as recycled water for drip irrigation.

21.60 Living green walls as well as green roofs can help adaption to a changing climate, improve air quality and address biodiversity loss. In addition, a greener urban environment is critical to improving the health and wellbeing of local communities.

Policy 39

Biodiversity and Geodiversity

A. In accordance with London Plan Policy G6 (Biodiversity and access to nature), the Council will protect and enhance the borough's biodiversity and geodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats and stepping-stone sites that connect wildlife or ecological corridors. 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) against inappropriate development; this includes sites of international or national nature conservation importance, such as Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs) or National Nature Reserves (NNRs) as well as those of London- and boroughwide importance, including Local Nature Reserve (LNRs) and Sites of Importance for Nature Conservation (SINCs);
2. protecting and conserving priority species and habitats that sit outside the nature conservation network of designated sites, including protecting other existing habitats and features of biodiversity value on non-designated sites as well as dark spaces that are important for some species, and promoting opportunities for their enhancement by using the Richmond Biodiversity Action Plan's aim and actions;
3. protecting ecological or wildlife corridors from development which may destroy, impair or harm the integrity of the corridor;
4. requiring development to deliver robust and measurable net gains for biodiversity in accordance with good practice principles for Biodiversity Net Gain (BNG) by incorporating and/or creating new habitats or biodiversity features, such as expansion and improvement of habitats, green and blue links or habitat restoration, incorporation of green roofs and walls, tree planting as well as micro-habitat features such as bird and bat bricks and boxes, hedgehog gates or wildlife ponds in line with other policies of this Plan;
5. requiring the following development proposals to provide a *minimum* measurable ~~2~~*1*0% net gain for biodiversity, in line with the latest available version of the DEFRA metric:

    a. ~~small-scale householder applications which increase the footprint and/or floorspace of the existing dwelling;~~
    b. all development proposals, including conversions or changes of use, that result in 1 dwelling unit or more;
    c. non-residential development proposals which increase the footprint and/or floorspace;

6. ensuring development positively contributes and enhances the wildlife value of green and blue infrastructure, particularly of ecological corridors (see Policy 34 'Green and Blue Infrastructure (Strategic Policy) '); the width of new ecological or wildlife corridors will be dependent on-site specific circumstances – the larger the development / application site, the wider the corridor;

7. protecting back gardens from development which may destroy, impair, or harm their integrity,~~:~~ ~~and removing Permitted Development Rights from~~ *where possible, to ensure* new developments, including conversions and changes of use ~~resulting in a new dwelling, for all proposals that require planning permission in order~~ to protect rear and front residential garden spaces as a cumulative key wildlife habitat resource.

B. Where development would impact on species or a habitat, especially where identified in the Richmond Biodiversity Action Plan (BAP) at London or local level, or the Biodiversity Strategy for England, development proposals shall demonstrate that the mitigation hierarchy has been followed sequentially in accordance with the principles of:

1. avoid (i.e. the applicant has to demonstrate that there is no alternative proposal with less harmful impacts);
2. reduce, moderate, minimise;
3. rescue (e.g. translocation);
4. as a last resort, to appropriately compensate for any damage (e.g. deliver off-site compensation or better biodiversity value).

C. In accordance with the London Plan Policy G6 (Biodiversity and access to nature), in addition to the need to follow the above hierarchy approach, the following mitigation hierarchy will also be applied to SINC~~'~~s:

1. avoid damaging the significant ecological features of the SINC site.
2. minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site.
3. deliver off-site compensation of better biodiversity value.

Adequate and sufficiently robust information must be submitted with planning applications for proposals which may affect any designated site or any important habitats, species or geological feature to ensure that the likely impacts of the proposal can be fully assessed.

D. In accordance with the London Plan Policy G6 (Biodiversity and access to nature), development proposals which seek to reduce deficiencies in access to nature and therefore help deliver robust, credible and measurable Net Gains for Biodiversity (by reducing natural green space deficiency) will be considered positively by the local planning authority.

E. Development proposals which would cause harm to a designated site with geodiversity value will not be permitted unless any damaging impacts can be prevented by appropriate mitigation measures. Development proposals which would affect a designated site with geodiversity value should seek to retain, restore and enhance the geological interest where possible.

Policies Map designations

Previous versions of Local Plans and their associated Policies Maps have identified Other Sites of Nature Importance (OSNIs) as those sites which have either been classified as having importance for biodiversity or have the potential to have biodiversity. This site terminology is being updated as part of this Local Plan and brought in line with the London Plan; they will now be identified as Sites of importance for Nature Conservation (SINCs). Those sites with potential for biodiversity, will be known as Candidate Sites and will be retained on a list held by the Council until such time as they are either designated as

a Site of Importance for Nature Conservation or removed from the list due to lack of qualifying criteria. At least every 10 years a review of the Richmond Sites of Importance for Nature Conservation will be carried out and any candidate sites on the list will be assessed against the criteria for designation, those fulfilling the criteria will be recommended for designation.

The Council appointed Salix Ecology to carry out a comprehensive review of sites designated for nature conservation importance in the borough. This includes reviewing existing designations as well as identifying potential new ones to ensure the borough has identified a coherent ecological network. The Nature Conservation Review was completed in 2021 and 2022.

As a result of this Review, all existing designated OSNIs will be renamed / relabelled as Sites of Importance for Nature Conservation (SINCs). In addition, the Review has recommended changes for some sites, such as:

New SINCs

Expansion areas to be added to existing SINCs

Removing areas from an existing SINC

Changing the SINC status (such as upgrades from 'Local' to 'Borough' importance) Amalgamating existing SINCs

Renaming existing SINCs

Further details, including a boroughwide map of the SINC changes, can be found in Appendix 4 of this Plan, and in the Salix Ecology Review of Sites of Importance for Nature Conservation in Richmond upon Thames, available on the Council's website www.richmond.gov.uk/open_land_biodiversity_research.

21.61 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.

21.62 The Richmond Biodiversity Action Plan (BAP) sets out the Sites of Metropolitan, Borough and Local Importance for Nature Conservation (SINC) in the borough. The designated SINC sites as well as Sites of Special Scientific Interest (SSSI) are clearly set out in the Richmond Policies Map. [It should be noted that the current Policies Map refers to SINCs as OSNIs.]

21.63 Sites of Importance for Nature Conservation (SINCs) comprise:

- Sites of Metropolitan Importance – strategically-important conservation sites for London
- Sites of Borough Importance – sites which support habitats or species of value at the borough level
- Sites of Local Importance – sites which are important for the provision of access to nature at the neighbourhood level.

21.64 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.

21.65 All development, particularly for new and replacement buildings and extensions to buildings, should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings at a ratio of one nest brick per dwelling on average are preferred, as these are suitable for multiple bird species. As outlined in the National Planning Practice Guidance, these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications, in line with best practice guidance.

21.66 Where development proposals could affect or harm a European Protected Species or its habitat, the application will be assessed against 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.

21.67 Biodiversity, including the wider ecological and green infrastructure networks, play a crucial role in adapting to the effects of climate change. Biodiversity enhances and enriches the borough's landscapes and wildlife and 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.

21.68 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, swift and bat boxes. Darkness is also important to wildlife, and species that are nocturnal and adapted and/or dependent on dark environments are particularly sensitive to light pollution, for example from security and amenity lighting from adjacent developments (also see Policy 43 'Floodlighting and other external artificial lighting').

21.69 The promotion of nature conservation should be treated as integral to any new development scheme, not as an 'add-on'. Layout, design, buildings, external lighting and landscaping schemes should take account of existing biodiversity features and habitats, and where applicable the need for maintaining dark environments. 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.

21.70 Sites of Importance for Natural Conservation (SINCs), priority habitats and other ecological features outside of the SINCs network will be protected. Developments should achieve biodiversity net gain, wherever feasible and appropriate. Opportunities to enhance existing habitats and create new habitats for priority species should be maximised. Developments within areas of nature deficiency should include features to enhance biodiversity, particularly for priority species and habitats.

21.71 Development will be expected to take all opportunities to improve access to nature - bringing nature to residents' doorstep. Development should aim to create net gains in biodiversity, leaving the natural environment in a better state than before.

Biodiversity Net Gain

21.72 Biodiversity net gain is an approach which aims to leave the natural environment in a better state than it previously was. The Council will require development proposals to maximise biodiversity benefits and ecological connectivity through ensuring that biodiversity is a key consideration early in the design process.

21.73 The Council requires 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:

1. habitat restoration, re-creation and expansion;
2. improved links between existing sites;
3. buffering of existing important sites and features, such as railway lines;
4. new biodiversity features within development; and
5. securing management for long term enhancement.

21.74 The overall priority is to secure the inclusion of on-site Biodiversity Net Gain (BNG) enhancement features. The baseline for establishing ~~20%~~ *the national minimum requirement of 10%* BNG ~~requirements~~ will be identified and achieved by undertaking a walkover survey (undertaken by an accredited ecologist) of the proposed development site. Losses and gains as a result of proposed development will be calculated using the national Biodiversity Metric. Biodiversity net gain complements and works with the biodiversity mitigation hierarchy set out in the NPPF. Any biodiversity net gain delivered as part of a compensation strategy for development should be in addition to the protection for designated sites, protected or priority species and irreplaceable or priority habitats. *Wherever possible, the Council encourages the minimum of 10% to be exceeded, through incorporation of ecological enhancements, as set out in part A of the policy. The importance of biodiversity in the borough is recognised and that due to pressures on species and habitats there is a need to protect and enhance biodiversity on sites in the borough, as well as the potential for delivering multi-functional benefits.*

21.75 In accordance with the Environment Act 2021, development will need to comply with the following principles and guidance:

- The latest and most appropriate Department for Environment Food & Rural Affairs (DEFRA) metric or agreed equivalent should be used to quantify the baseline and post-development biodiversity value of the development site and off-site areas proposed for habitat creation. Natural England's Small Sites Metric will be appropriate for most *small sites* ~~small-scale householder applications as well as other minor development~~, whilst the Biodiversity Metric 3.1 (or later versions) should be used for other applications for development. Development proposals should also follow the good practice principles for development set out by the Chartered Institute of Ecology and Environmental Management (CIEEM).
- Major new developments:
    - should result in no net loss in biodiversity value, as assessed against the DEFRA biodiversity offsetting metric, the Environment Bank Biodiversity Impact Calculator or any metric which the Council subsequently adopts formally;
    - are required to submit a Biodiversity Net Gain plan to set out how the baseline biodiversity value has been calculated and how the net gain target will be achieved; The plan must demonstrate that the 'post-development' biodiversity

value of the development is greater than 'pre-development' biodiversity value by ~~at least 20%~~ *a minimum of 10%*.

- are required to submit a 30-year management plan, detailing how the post-development biodiversity values of the site and any supporting off-site mitigation will be achieved;
- need to ensure that any off-site habitats created are well located to maximise opportunities for local nature recovery; where off-site habitat mitigations solutions are necessary to restore and enhance a nearby designated nature conservation site or provide new replacement habitat, these should be supported by suitable ecological evidence and survey information to ensure that any off-site mitigation is suitably robust and appropriate.

- Small-scale development proposals should avoid encroachment within rear garden spaces. The Council ~~will~~ *may* remove Permitted Development Rights from ~~all~~ proposals that require planning permission to protect residential gardens, which contribute substantially to the total green space in the borough. The mosaic of gardens in the borough provides the space and diversity that organisms need to fulfil their niches. As well as providing a habitat, the mosaic of gardens also assists the movement of species between public green spaces and/or countryside, thus increasing the overall connectivity of the landscape and smoothing the effects of habitat fragmentation.

21.76 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 and connectivity. The implementation of the Richmond BAP is an important vehicle to improving the biodiversity of the borough.

21.77 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 BAP, the Mayor of London's Biodiversity Strategy and the London Tree and Woodland Framework.

21.78 The Council will produce further planning guidance in the form of a SPD on biodiversity, specifically on biodiversity net gain, and set out for applicants and developers how biodiversity net gain can be delivered on a variety of sites, ranging from major to small-scale proposals. *The London Local Nature Recovery Strategy is being prepared and will identify opportunities for nature recovery and strategic biodiversity priorities.*

Geodiversity

21.79 Geodiversity is concerned with the variety of rocks, fossils, minerals, landforms, soils and natural processes, such as weathering, erosion and sedimentation, that underlie and determine the character of our natural landscape and environment.

21.80 Geodiversity is also a key factor in the borough's cultural identity. The geodiversity of any area is an equally important part of its natural heritage as its biodiversity. Conservation, sustainable management, educational use and interpretation of geodiversity are thus as important as that of biodiversity or archaeology.

21.81 National policy requires sites with geological conservation interests to be protected.

21.82 In line with London Plan Policy G9, there are currently no regionally important geological sites identified in Richmond borough, however Richmond Park is designated as a locally important geological site.

Policy 40

Rivers and River Corridors

A. The natural, historic and built environments of the borough's watercourses will be protected. Development adjacent to the river corridors will be expected to contribute to improvements and enhancements to the river environment, including improved public spaces, access to the borough's rivers, especially the Thames Path, the creation of new habitats, and improvements of flood defences and flood storage. *The Council expects development adjacent to rivers to contribute to improvement in water quality where relevant in accordance with Policy 9 Part C.*

Thames Policy Area

B. Development 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 (Kew to Chelsea) and the Council's Conservation Area Statements and Studies.

C. 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. Buildings fronting the river should incorporate uses that enable local communities and the public to enjoy the riverside, especially at ground level in buildings fronting the river.

Public Access

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

1. Retain existing public access to the riverside and alongside the river; and
2. Enhance existing public access to the riverside where improvements are feasible; or
3. Provide new public access to the riverside where possible, which should be accessible at all times, and maintain existing points of access to the foreshore subject to health and safety considerations. All major development proposals adjacent to the borough's rivers are expected to provide public access to the riverside.
4. Provide riparian life-saving equipment where required and necessary; this includes, where relevant, the provision of appropriate drowning prevention measures, such as edge protection and appropriate signage in riverside areas.

River Thames public riverside walk

E. 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. For major developments, applicants will be expected to work with adjoining landowners in case ownership issues would prevent public access.

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

F. 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 unless it can be demonstrated that no other river-dependent or river-related use is feasible or viable;

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 integrate 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.

21.83 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 and Blue Infrastructure network and provide valuable habitats for wildlife including recreational opportunities for local communities.

21.84 The River Thames runs for 34 km through the borough and forms part of the Blue Ribbon Network, which is a network of linked waterways of strategic importance for London. 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.

21.85 The borough's Blue Ribbon network contains the River Thames, and 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.

21.86 The network of linked waterways across the borough and beyond are multifunctional assets. They provide transport and recreation corridors; green infrastructure; a series of diverse and important habitats; a unique backdrop for important heritage assets, including World Heritage Sites, landscapes, views, cultural and community activities; as well as drainage, flood and water management and urban cooling functions. As such, the rivers provide environmental, economic, health and wellbeing benefits for communities and contribute to the special and distinctive character of the borough.

21.87 The Tidal Thames within the London Borough of Richmond is within the Southeast Inshore Marine Plan area. There is an overlap between marine and terrestrial planning. A plan for this area has been prepared by the Marine Management Organisation (MMO) and all authorisation or enforcement decisions must be made in accordance with the Marine Plan for any planning activity below mean high water springs, including sections of a tidal river. Early consultation with the MMO is advised.

21.88 The River Crane is an important river corridor, running for 30 kilometres from Harrow through Twickenham and St Margarets to the Thames at Isleworth, 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 metropolitan park that provides a continuous, accessible link between Hounslow Heath and the River Thames,

incorporating river restoration works along the lower Crane, including a long distance footpath, improved access for surrounding communities and an enhanced wildlife / ecological corridor. This applies in particular to the following development sites that are considered to be within the River Crane and the connecting Duke of Northumberland River corridor: Greggs bakery, The Stoop, Twickenham Stadium, the Depot and Mereway Day Centre.

21.89 Setting back built development from the borough's rivers, including riverbanks and existing flood defences will be required in line with Policy 8 'Flood Risk and Sustainable Drainage (Strategic Policy) '. 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 culverted main rivers) and 16 metres for the tidal Thames. This will not only allow for the maintenance and future upgrading of the flood defences, but provide opportunities to enhance biodiversity, create buffer zones that support the green infrastructure network and reduce light spill into the river (also see Policy 43 'Floodlighting and Other External Artificial Lighting '), as well as increase and open up public access alongside and to the river. *The Council encourages soft-engineering approaches to riverbank protection and the incorporation of an undeveloped buffer zone, where development can contribute to the natural state of the river environment that accords with Policy 39 Biodiversity and Geodiversity.*

21.90 Where barriers to fish movement (such as weirs) are present in a watercourse adjacent to or within a development, the applicant is encouraged to propose a design to include the removal of that barrier, or where not feasible, incorporate measures to allow for the natural movement of fish within the watercourse.

Thames Policy Area

21.91 Development proposals within the Thames Policy Area, where appropriate, should ensure that their use and design establish 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 Appraisals.

21.92 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.

21.93 *The river element of the BNG metric 4.0 (or any superseding version), set out in Policy 39 and the supporting text, will need to be submitted where the BNG guidance advises this is necessary in order to provide increased watercourse connectivity and associated habitat improvements.*

Public access

21.94 There is public access to much of the riverbank in the borough either by towpath or riverside open spaces. New developments adjacent to and alongside the borough's rivers should provide public access to the river, riverside and the foreshore where feasible and appropriate. The Council will require new developments adjacent to the river to consider the need to provide appropriate drowning prevention measures, such as edge protection, appropriate signage and CCTV. 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. The Council will also explore opportunities to improve accessibility between different areas of the borough that are separated by the borough's rivers, such as between Ham and Twickenham (see the Place-based strategy for Ham, Petersham & Richmond Park as well as for Twickenham, Strawberry Hill and St Margarets, which refer to the initial feasibility for a new pedestrian and cycle bridge).

21.95 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. The Council expects developers, particularly on major development sites, to work with adjoining landowners where land ownership issues may prevent the aim of achieving public access; this is to ensure the river and the riverside can be enjoyed by the wider public and local community.

21.96 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.

21.97 The Council will support initiatives to de-culvert rivers where it is feasible and practicable to do so, in line with the Council's Surface Water Management Plan.

21.98 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

21.99 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.

21.100 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 that 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) and the network of Safeguarded Wharves.

21.101 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. There should be a move to reducing carbon emissions and the environmental impact, for example away from diesel engines. River-related uses may also include a garden or park specifically designed to enhance public appreciation and public access to the river.

21.102 The Council will therefore protect the existing river-related industrial and business uses and ensure they are not lost to other uses. 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. The redevelopment of existing river-related industrial and business sites to residential and non river-related business uses will not be permitted unless it can be demonstrated that such uses are not viable or feasible. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for river-dependent and river-related uses over a minimum period of two continuous years in accordance with the approach set out in Appendix 2.

Policy 41

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. Applications for replacement houseboats should demonstrate they would not be materially larger than existing nor harm the character of the river.
C. A new mooring or other floating structure or development of an existing mooring 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. protects and/or enhances the biodiversity of the river;
3. the proposed use is river-dependent or river-related;
4. there is no interference with the recreational use of the river, riverside and navigation; and
5. the proposal is of wider benefit to the community.

21.103 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.

21.104 Whilst the Council has limited powers regarding the appearance of boats not subject to planning controls, planning permission is required for new moorings and change of use of the river bank and river bed for permanent mooring. Permanently moored vessels and development into waterways should only be permitted for water-related uses. The River Thames should not be used as an extension of developable land in London, nor should parts be a continuous line of moored craft. Proposals for development into waterways will protect at a minimum, and where appropriate enhance, the biodiversity of the river.

21.105 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.

Policy 42

Trees, Woodland and Landscape

A. The Council will require the protection of existing trees and the provision of new trees in accordance with London Plan Policy G7 (Trees and Woodlands), as well as shrubs, hedgerows and other vegetation of landscape significance that complement existing, or create new, high quality green elements, which deliver air quality, climate change, amenity and biodiversity benefits.

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

Trees and Woodlands

1. resist the loss of trees, including aged or veteran 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 and it is not possible to retain the tree as part of the development; or felling is for reasons of good arboricultural practice;

2. resist development that would result in the loss or deterioration of irreplaceable habitat such as historic parkland;

3. 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;

4. require all developments to minimise impacts on existing trees, hedges, shrubs and other significant vegetation on site and on adjoining land, and provide sufficient space for the crowns and root systems of existing and proposed trees and their future growth. Developments within proximity of existing trees are required to provide protection from any damage during development;

5. require, where practicable, an appropriate replacement for any tree that is felled; where this is not possible, 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);

6. require new trees to be of a suitable species for the location in terms of height and root spread, taking account of space required for trees to mature; the use of native species as well as large-canopied species are encouraged where appropriate;

7. where appropriate and relevant, require the provision of large-canopied tree lined streets as set out in the NPPF;

8. 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).

Landscape

9. require the retention of important existing landscape features where practicable;

10. require landscape design and materials to be of high quality and compatible with the surrounding landscape and character; and

11. require planting, including new trees, shrubs and other significant vegetation where appropriate, prioritising the use of appropriate native tree and shrub species to help support biodiversity and connect to the wider green infrastructure network.

C. The Council will use Tree Preservation Orders (TPOs) or attach planning conditions to protect any trees considered to be of value to the townscape and amenity in order to secure their retention.

D. The Council will seek long-term maintenance and management plans to accompany tree and landscaping proposals where appropriate.

21.106 The abundance of trees is a great asset to this 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. Trees and other planting, including contiguous gardens and green oases, deliver multiple benefits. They provide an important habitat for wildlife; help improve urban air quality by reducing levels of carbon dioxide and airborne pollutants such as 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. They play an important part in supporting biodiversity by providing wildlife habitats and help deliver net gains for biodiversity by helping to restore, strengthen and create landscape-scale green infrastructure networks and help establish coherent ecological networks (strengthening wildlife and ecological corridors).

21.107 Trees and other landscape features can help areas to adapt to the effects of climate change, particularly due to their ability to capture and store atmospheric carbon dioxide, providing a cooling effect and contributing to the reduction of urban heat islands through shade cover and regulating local temperature extremes; this is important due to projected future increases in temperature as a result of climate change with more frequent and more pro-longed summer heatwaves and higher summer temperatures. In addition, they can assist in reducing surface water run off rates and flash floods during heavy rainfall events through absorption and infiltration.

21.108 The London Plan sets out the Mayor's ambition to increase tree canopy in London by 10% by 2050. The Council's Climate Emergency Strategy and Action Plan commit to increasing tree cover in the borough. Following an extensive survey of trees across the borough on highways, cemeteries, parks and open spaces and property owned by the Council, a programme of extensive planting is being undertaken, including replanting at sites where trees have been removed and where tree planting could mitigate the effects of climate change. There is further work planned to undertake a boroughwide tree assessment, and opportunities for tree planting in strategic locations; this includes identifying veteran and heritage trees that can be celebrated through the creation of educational material and walks.

21.109 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.

21.110 Existing trees, shrubs, and other important vegetation such as hedgerows contribute significantly to the Council's wider biodiversity and their protection and enhancement will be important to achieve the Council's policy to provide a net-gain in biodiversity. In line with

these objectives, development proposals are required to retain and protect existing trees, and minimise any impacts on trees, shrubs and other significant vegetation such as hedgerows, 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).

21.111 In accordance with the overarching adopted London Plan Policy G7 (Trees and woodlands), the planting of trees and new urban woodlands in strategic locations within the borough to help deliver landscape-scale green infrastructure enhancements and contributing to an increase in London's canopy cover will be encouraged, prioritising the use of native tree species. Tree planting should be considered from the design stage of a proposal. The location of new trees should be planned to complement proposed features, have an appropriately sized tree pit and soil volume, be bio-secure so that species are protected from exposure to new pests and diseases, and be appropriate for the intended use, of the development. The Council will request details relating to the planned maintenance for new trees and landscaping on development sites, to ensure planting becomes established, particularly within the first five years, and will support mature specimens. Planning conditions will also be used, as appropriate.

21.112 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 appropriate 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. Various species of tree within the borough are particularly vulnerable to the effects of climate change: this was evidenced in 2018 where a long, hot summer resulted in high mortality rates of trees both native and non-native, including Rowan (Sorbus aucuparia) and the common horse chestnut (Aesculus hippocastanum). 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 addressing the effects of climate change, improving air quality, amenity and ecosystems.

21.113 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. Where a tree has been removed, the location will be reserved for a replacement tree, the Council will not agree to the construction of a vehicular cross over or drop kerb in its place. The Council will encourage, where practical, that replacement trees result in a net increase in tree canopy cover.

21.114 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. Guidance on the retention and planting of trees in new development can be found in the report Residential Development and Trees published by the Woodland Trust.

21.115 The Council plans to publish guidance in the form of a SPD on Trees, which will include guidance on planting. This is intended to provide further details on the information required at pre-application and application

stage, as well as around management, maintenance and monitoring. The Council intends to produce a Tree Planting Strategy that can also include updated advice on the use of native and drought-resistant species in light of climate change.

Policy 43

Floodlighting and Other External Artificial Lighting

A. Floodlighting, including alterations and extensions, of sports pitches, courts and historic and other architectural features will be permitted where it can be demonstrated there will not be unacceptable harm to character, biodiversity or amenity and living conditions.
B. The Council will consider the positive benefits to be gained from other artificial lighting proposals, such as for safety of movement, security of property or extension of working practices.
C. The Council will seek to balance the need for any such proposal against the impact it may have on the environment in terms of obtrusive light.
D. 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.

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

21.116 Floodlighting can enable the full use of outdoor sport and leisure facilities, but consideration must be given to any likely harm to biodiversity, amenity and local character. The borough is rich in wildlife, open spaces and biodiversity. Darkness is important to wildlife, and species that are nocturnal and adapted and/or dependent on dark environments are particularly affected by light pollution. Lighting can also have a visual impact.

21.117 External lighting for sports, security or other purposes, should be installed so that the intensity and direction of light does not cause any demonstrable harm.

21.118 For a planning application for outdoor sports lighting to be successful the lighting should be designed by a specialist lighting designer, lighting contractor or manufacturer who can use specialist software to produce lighting designs which demonstrate the required performance standards, have minimal impact on the local environment and meet the planning regulations. The choice of luminaire with the right optical distribution at the right mounting height is critical to minimising light spill and obtrusive light effects, while providing the right lighting performance for playing sport. A statement should justify why the proposed external lighting is required for its intended use and show that every reasonable effort has been made to minimise harm.

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

1. The benefits: the need for lighting must 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;

2. 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;
3. 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;
4. 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;
5. Energy usage and energy efficiency (the use of low energy lighting will be expected);
6. Any planned mitigation measures such as restriction on lighting levels and hours of use.

21.120 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 and for Bats and Artificial Lighting, as well as the guidance produced by Sport England and the Institution of Lighting Engineers on Artificial Sports Lighting, having regard to any relevant future updates to industry standards and best practice.

21.121 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 the need to maintain correct settings as well as monitoring, both within the site and on adjoining land.

22 Improving design, delivering beautiful buildings and high-quality places

Policy 44

Design Process

Optimising site capacity through the design-led approach

A. In order to make the most efficient use of land by optimising site capacity a design-led approach is required, in accordance with London Plan Policy D3. A design-led approach will include an evaluation of the attributes of a site as well as the surrounding context, character and capacity for growth, as set out in Policy 28 'Local Character and Design Quality (Strategic Policy)'. Good design will be assessed as part of the planning process through use of the following tools.

Design and Access Statements

B. Design and Access Statements must clearly document the design evolution and rationale behind the proposal. They must include an analysis of the site constraints and wider surrounding context, opportunities and an assessment of how the context has influenced the design. Where relevant they must demonstrate how the proposal aligns to the Conservation Area Appraisals as well as the design guidance for the relevant character area as specified within the Urban Design Study and the Village Planning Guidance SPDs.

Pre-application

C. Developers are strongly encouraged to engage with the Council's pre-application service early in their thinking prior to submitting a planning application. Applications for major development should be informed by a detailed and genuine pre-application process. This process involves:

1. engagement in a planning performance agreement (PPA) that sets a framework for the Council's consideration of a proposal; and

2. engagement with the Richmond Design Review Panel (RDRP) as set out in the Council's RDRP Terms of Reference which details the proposals that must be referred to the Panel.

D. All major applications must demonstrate a meaningful and consistent engagement with local communities that gives them genuine power to shape development from the early stages and throughout the process.

E. Applicants will be required to provide 3D digital massing models to enable the Council to assess cumulative impact of development where relevant. This could be in a form that accommodates software, such as VU.City. This is required for Tall Building proposals or those located within the protected views and vistas as designated in Policy 31 'Views and Vistas 'and shown in the Polices Map.

F. The use of design codes is encouraged for large developments especially those that will involve construction over multiple years. Design codes will be essential as part of major development sites which are subject to outline applications. The codes will need to be prescriptive, specifying the height, scale, design rationale, materiality and public realm parameters, and align with the guidance set out in the National Model Design Code.

Planning applications and post-planning

G. Design quality must be maintained through to building completion in accordance with London Plan Policy D4.

H. As much design detail as possible should be provided upfront at planning application stage to avoid the need for later design amendments that negatively impact quality (such as smoke vents, rainwater goods, grilles, signage and other alterations and items to be affixed to the elevations). This is particularly important for major or complex schemes.

I. Developments should achieve the highest standards of fire safety in accordance with London Plan Policy D12. Major applications must be accompanied by a Fire Statement and all other applications require submission of a Fire Safety Strategy. Development that includes a lift core must include at least one evacuation lift.

J. Outline applications will not be accepted for proposals in Conservation Areas, proposals that could impact on the setting of Listed Buildings or proposals that include Tall Buildings. The wording of the planning permission, associated conditions and legal agreements should provide clarity regarding the quality of design.

22.1 The design-led approach together with the processes and tools set out in this policy will help ensure all development delivers good design.

22.2 Nationally, there has been an increased focus on the central role of design to create beautiful places, as reflected in the National Planning Policy Framework (NPPF) and the National Design Guide. The London Plan focuses on a design-led approach to deliver beautiful buildings and high-quality places.

22.3 Through development and change, there is an opportunity to enhance the character of an area to benefit existing communities and future residents and visitors. The borough includes numerous parks, Conservation Areas, listed buildings, well utilised open spaces, and is the only London Borough to lie on both sides of the River Thames. Development will need to recognise the unique circumstances in our borough and it is important that proposals demonstrate how a character-led approach to any proposal, including intensification, has been taken.

22.4 In the London Plan, Policy D3 sets out the details of the design-led approach for development proposals to follow, and Policy D4 details the process and actions that will help ensure development delivers good design whilst also ensuring the most efficient use of land so that development on sites is optimised. The optimum capacity for a site does not mean the maximum capacity. A design-led approach places an emphasis on ensuring developments are sensitive to the existing character, by incorporating positive attributes of an area as well as helping establish character or removing negative attributes (such as unsympathetic building extensions and alterations that undermine the consistency and quality of the townscape).

22.5 The Urban Design Study provides an analysis of character, capacity for growth and what elements of design could be improved across the borough, along with specific design guidance for each character area. Design and Access Statements should set out the consideration of design options, using the principles of the ten characteristics of well-designed place as set out in the National Design Guide; this should be proportionate to the scale and type of development, although the principles can be applied to larger schemes as well as the detailed design of a small space.

22.6 It is important that design quality is maintained throughout the whole process by providing the detailed design of a development early in the planning process and ensuring it is delivered. Landscaping details often constitute the key elements of design via the creation of a desirable environment and improving the public realm, which are instrumental to the subsequent quality of a place. The Council will therefore seek detailed elements such as landscaping upfront, rather than securing relying on planning conditions, to allow for a proper

assessment as part of the planning process. This would also ensure there is permeable surfacing and space to accommodate trees and allow for them to reach maturity and improve visual amenity and biodiversity.

22.7 The London Plan recognises the importance that 3D virtual reality tools and other interactive digital models have in helping understand the options and opportunities for particular sites. Applicants will therefore be required to submit graphic 3D modelling (as provided for example by VU.City) for buildings proposed in the tall building zones or those located within protected views and vistas to visually show the proposed development.

22.8 Community engagement is an integral part of the design process and should provide local communities and local interest groups with an opportunity to have a meaningful say in how their area develops. The Council particularly encourages developers to engage with less frequently heard communities and residents who are typically underrepresented in the planning process. Local interest groups could include, but not exclusively, schools and higher education facilities, local businesses, amenity groups, faith groups, sports organisations, voluntary organisations, charities and outreach organisations.

22.9 Engagement should commence in early development stages and continue throughout the duration of the design and development process. It should not be a 'tick box' exercise for minor elements of the development, but should seek to empower communities by working with them to shape their environment and unlock their knowledge of a place.

22.10 Meaningful engagement results in mutual positive outcomes for the applicant and local community. Adverse impacts on the community and local area can be identified early on and appropriately mitigated, resulting in fewer delays at planning application stage; public benefits from a scheme can also be better tailored for improved outcomes for the community, which can result in greater public 'buy-in' to a development scheme. These measures if meaningful should result in less opposition to a proposal when planning permission is sought.

22.11 The submission of a Community Engagement Statement is required for all major applications at validation stage; all other applicants are strongly encouraged to engage with the local community prior to the submission of an application and all applicants are advised to consult the Council's Statement of Community Involvement. The Council*'s* ~~is also producing~~ further guidance, 'Raising the Bar *- Early Engagement Guidance for Applicants*', *has been adopted* to aid developers with their consultation *process and set out best practice, along with the Council's expectations for achieving high quality engagement*. The Council recognises that the level of community engagement should be proportionate to the scale of development.

22.12 Pre-application discussions are an important tool for achieving the best outcome on a site and ensuring that wider place-making objectives are met. The Council promotes the use of planning performance agreements (PPAs) to provide a framework for handling a development proposal from pre-application stage through to decision, including a target committee date, expectations and programme of meetings. The approach should be proportionate to the nature and scale of a proposed development and complexity of the issues to be addressed.

22.13 The Richmond Design Review Panel (RDRP) has been set up with the aim of raising the standard of design quality in the borough. It is an independent multi-disciplinary body whose members are skilled in architecture, planning, landscape architecture, urban design, engineering, transport planning and heritage conservation. For each design review, the Panel is based on the expertise and specialist skills required for the project(s) being reviewed. The Terms of Reference on the Council's website set out the current thresholds for types of proposals triggering a design review, as well as details of the types of reviews and fees.

22.14 Since the publication of the National Design Guide, and the subsequent publication of the National Model Design Code, there is increased emphasis on the use of Design Codes. Design coding is one tool available to local planning authorities, communities and

developers to define and deliver good design and ensure design quality is upheld throughout the planning process. Design Codes are expected to form a role in the Government's proposed future reforms of the plan-making system and should be developed collaboratively with stakeholders and the community as appropriate. A Design Code is a set of simple, concise, illustrated design requirements that are visual and numerical wherever possible to provide specific, detailed parameters for the physical development of a site or area. The borough-wide Urban Design Study, together with the National Model Design Guide, is intended to be used as a basis for any future Design Codes. Design Codes will be in addition to design guides, planning / site briefs, Conservation Area Appraisals and masterplans as well as guidance set out in the NPPF, National Design Guide, National Model Design Code, planning practice guidance and London Plan.

22.15 It is essential that the fire safety of developments is considered from the outset of the design process. The evolution of a fire safety strategy and associated evacuation strategy should be iterative, progressing alongside the detailed design of the development and understanding how it will be used and occupied. Where development does not meet the threshold for a Fire Statement, the Fire Safety Strategy should be proportionate to the scale of the development. The Fire Statement and/or Fire Safety Strategy must demonstrate how the London Plan fire safety policies are met. The onus will be on developers to pay for the cost of any independent assessment on behalf of the Council.

Policy 45

Tall and Mid-Rise Building Zones

Definitions:

Buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be **tall buildings.**

Buildings which do not trigger the definition of a tall building set out above, but are 5 storeys or over, or 15 metres or more from the ground level to the top of the building (whichever is lower) will be considered to be **mid-rise buildings**.

A. Proposals for tall buildings will only be appropriate in Tall Building Zones identified on the Policies Map and in Appendix 3, where the development would not result in any adverse visual, functional, environmental or cumulative impacts, having regard to all criteria set out in London Plan Policy D9. To take account of the local context, proposals for tall buildings should address the following criteria:

Visual Impacts

1. Tall buildings should ~~respect~~ *avoid harm to* the views and vistas towards heritage assets across the borough and in neighbouring boroughs, including distinctive roof line features.
2. The location of tall buildings should avoid substantial visual interruptions in areas with otherwise very consistent building and/or roof lines.
3. Tall buildings should respond to the analysis of views and vistas (Policy 31 'Views and Vistas ') towards the site to ensure the form and detailing are sympathetic to the wider context.
4. Tall buildings should consider the design of the lower, middle and upper parts of the tall building and how they work together as well as with the surrounding area and mid-range and long-range views.

5. Development proposals should be supported with graphic 3D modelling to assess the individual and cumulative impact of the proposal on both the existing and emerging skyline, and on day-time and night-time views, in line with Policy 44 'Design Process'.
6. Development proposals affecting the setting and approaches of the Kew World Heritage Site, must address all criteria set out in Policy 32 'Royal Botanic Gardens, Kew World Heritage Site '.

Spatial Hierarchy

7. The massing of tall buildings should respect the proportions of their local environment, including the consideration of the width of adjacent streets as well as public open spaces, parks and watercourses, and should be designed so as not to overwhelm the street and adjacent context.
8. In cases of tall buildings located close to the street edge, proposals should incorporate measures to soften their edges and provide positive public spaces at their base through the use of generous walkways and mature planting.
9. Proposals for Tall Buildings will ~~not~~ be ~~permitted~~ *resisted* outside the identified Tall Building Zones (see Appendix 3).
10. Proposals for tall buildings should not exceed the appropriate height range identified for each of the Tall Building Zones in Appendix 3. The height of tall buildings will be required to step down towards the edges of the zone as indicated on the gradient map unless it can be demonstrated that this would not be appropriate in the local context.

Fire Safety

11. Developments should achieve the highest standards of fire safety in accordance with London Plan Policy D12. All residential development over 30m in height must be designed to provide two staircases.

Tall and Mid-Rise Building Near the River Thames Frontage

B. Proposals for tall and mid-rise buildings should address the following criteria:

1. The design of tall buildings and mid-rise buildings fronting the River Thames must respond to views towards them as well as from them.
2. In areas of larger-scale riverfront buildings, landward facing orientation should be considered and stepping down appropriately to provide a transition towards the existing character and scale.
3. The design of tall buildings and mid-rise buildings should maintain the river frontage as a public resource. Developments should be set back to physically and visually ensure the Thames Path acts and feels like a welcoming public route without heavy overlooking from adjacent riverside residences. Ground floor uses should seek to activate the space as far as possible.

Mid-Rise Buildings

C. Proposals for new mid-rise buildings or extensions to existing buildings which increase their height to 5 storeys or over, will usually only be appropriate in Mid-Rise and Tall Building Zones identified on the Policies Map and in Appendix 3. Proposals will be required to meet the requirements of Policy 44 'Design Process' and Policy 28 'Local Character and Design Quality (Strategic Policy)', and should:

1. be carefully located and designed to step down to surrounding existing and proposed buildings;
2. respond positively to and protect the setting of existing buildings in the surrounding area, including heritage assets and their setting;

3. respect the local character, including the scale, width and proportion of adjacent streets and watercourses, and potential effects on key characteristics, valued features and sensitivities as outlined in the character area profiles in Section 3 of the Urban Design Study;
4. deliver a varied and interesting roofline in response to surrounding architectural styles, avoiding long monotonous blocks of development and/or excessive height;
5. where proposals are located within identified Mid-Rise and Tall Building Zones, buildings should not exceed the appropriate height identified in Appendix 3;
6. in cases of mid-rise buildings located close to the street edge, proposals should incorporate measures to soften their edges and provide positive public spaces at their base through the use of generous walkways and mature planting.

D. Proposals for mid-rise buildings may be permitted outside the identified Mid-Rise and Tall Building Zones where they are:

1. located in a town centre (Whitton, Teddington, Twickenham, Richmond and East Sheen); the Character Area Design Guidance in the Urban Design Study should be considered, where relevant, to demonstrate appropriateness to local context; and/or
2. within transitional areas to Tall Building Zones; and/or
3. within or adjacent to areas which include buildings taller than the prevailing height or are subject to substantial redevelopment; and/or
4. a result of land assembly which enables the creation of a comprehensive scheme; and/or
5. close to strategic roads and good public transport accessibility; and
6. able to meet Part C of this policy.

Policies Map designations

The Tall and Mid-Rise Building Zones have been added to the Policies Map, and are shown in Appendix 3.

22.16 Tall buildings can make a crucial, positive contribution to good urban design as well as providing densities which support a scheme's viability, maximising the delivery of affordable housing and optimising the use of land. Height is only one element of a number of factors when considering a development's acceptability and whether it is of good design. Nevertheless, height is a significant factor in terms of increasing the visibility of a development and its potential wider impact on an area's character.

22.17 The text box above sets out the borough's local definition of a tall building. This definition has been developed in response to the low-rise building heights, character and sensitivities within the borough. The use of a single definition of a tall building provides an approach which is simple and easy to understand for residents and developers, and which adds certainty to the implementation of the policy.

22.18 The definition will be applied in the context of Policy D9 of the London Plan, which states that local definitions of a tall building should not be less than 6 storeys or 18 metres measured from ground to the floor level of the storey (i.e. excludes the height of the uppermost storey). For clarity, buildings will be considered tall where they meet the definitions set out above and in Part A of Policy D9 of the London Plan.

22.19 Ground level is defined as the surface of the ground immediately adjacent to the building in question and does not include any additions laid on top of the ground (such as decking). Where the site is not flat, the ground level will be considered as the highest part of the surface which adjoins the building. Definition of the top of the building does not include typical structures and plant found at roof level, such as railings, plant equipment, maintenance cranes or elevator shafts; however, the placement, scale and design of these must follow good practice and the Council requires design details to be submitted early in the planning process, in line with Policy 44 'Design Process'.

22.20 It is recognised that some developments will have differing floor heights, particularly at the ground floor. The definition for a tall or mid-rise building applies to whichever is the lower between the number of the storeys and the metres above ground level. Where applications involve the addition of storeys on a building that would already be classed as 'tall', or the additional storeys would cause the building to be considered 'tall' in accordance with the definition above, an assessment against the criteria of this policy will be carried out.

22.21 The Urban Design Study draws on development capacity, existing tall buildings and consented tall buildings mapping to help inform an overall strategy for potential development and/or increased height across the borough. The Study sets out a strategy for mid-rise and tall building development (see the overall development strategy Map 1 in Section 5 of this Plan) and from this identifies Tall and Mid-Rise Building Zones (see Appendix 3 for zone details).

22.22 ~~Tall buildings will only be an acceptable form of development in Tall Building Zones identified on tall building maps in Appendix 3.~~ *Tall building zones have been informed by the Urban Design Study which identified constraints that are considered unlikely to change over the plan period due to the uniqueness of the character of the borough including the expanse and quality of open landscapes, protected views and heritage assets. As such, and in line with London Plan Policy D9 part B(3), there is a presumption against tall buildings outside the locations identified in Appendix 3.*

22.23 The designation of an area as a Tall Building Zone does not mean the area has capacity to receive tall buildings within the appropriate range across its whole extent. Development proposals will need to consider the specific context of the plot, existing buildings surrounding the plot and any other development proposals in the area, including consented schemes. This designation also does not preclude other forms of development. Locations identified as Tall Building Zones can also accommodate high density mid-rise or mansion-block style development, rather than only standalone high-rise towers. ~~Outside Tall Building Zones, there is no presumption in support of tall buildings.~~

22.24 The identified Tall Building Zones seek to strike a careful balance between maximising the development potential of key areas of growth and protecting the significance of valued historical assets including listed buildings and Conservation Areas (see Policy 29 'Designated Heritage Assets ' for the details of designated heritage assets). The existence of already built tall buildings where their heights and location are deemed to be inappropriate, has not been considered as a sufficient justification for the creation of further Tall Building Zones. The townscape of our borough is not generally appropriate for locating clusters of tall buildings. As such, clustering is discouraged.

22.25 Tall building maps in Appendix 3 identify an appropriate tall building height range for each zone and show how heights should be dispersed across the zone. ~~Darker~~ *Red* colours *show areas appropriate for tall buildings and orange colours show areas appropriate for mid-rise buildings. Darker colours* indicate more potential for height and the lighter colours indicate less potential for height. The maps make it clear that the identified maximum appropriate height does not apply to the entire zone; buildings will be expected to step down towards the edges of the zone as indicated on the gradient tall buildings map unless it can be demonstrated that this would not be appropriate in the local

context. The appropriate height ranges have been informed by a visual impact analysis, taking into account heritage asset settings, views and, where relevant, existing guidance on cluster formation and 3D modelling. Development proposals exceeding the appropriate height will not be supported on design grounds.

22.26 Tall building development must be of such a design quality that it enhances the character of the place within which it is set. London Plan Policy D9 sets out detailed requirements and criteria against which tall building proposals will be assessed. These include consideration of the visual, functional, environmental and cumulative impacts of development. The criteria outlined in the London Plan are complemented by detailed criteria that responds to the local context in this Plan. This policy and London Plan Policy D9 should be read in conjunction with other Local Plan policies, including Policy 28 'Local Character and Design Quality (Strategic Policy)' which sets the requirements for delivering high quality, design-led development across the borough. A design-led approach should follow Policy 44 'Design Process'. Other relevant considerations are provided in Historic England's Advice Note 4 on Tall Buildings 2015.

22.27 Richmond has the longest frontage to the River Thames of all the London boroughs. While the scale of the river presents opportunities for height, any tall structure will still have a major influence due to the long sweeping panoramic views across and along the banks, which extend well beyond the borough and can be prominent and highly visible from several places. Any tall or mid-rise development alongside the River Thames will need to ensure that the river front will not feel private, heavily overlooked or shaded, as detailed in Policy 40 'Rivers and River Corridors '. Moreover, the building design will need to consider its role as an important marker for legibility/identity of the borough and wayfinding, owing to its high visibility along the riverfront. In particular, riverside development viewed from bridges are one of the ways that the greatest number of people experience the borough. Development in areas of larger-scale riverfront buildings, such as Mortlake, should consider their landward facing orientation and step down appropriately to provide a transition towards the typical period terraces and modest housing scale. Materials may also be used to transition from the river frontage, where views are cherished, towards the more traditional natural materials of housing stock within the borough.

22.28 The above text box sets out the borough's definition of a mid-rise building. This additional designation provides a greater degree of control over buildings which seem tall in relation to the proportions of the surrounding townscape context, yet not sufficiently tall to be considered a tall building in line with the London Plan definition. The majority of buildings in the borough are typically 2-3 storeys, as such mid-rise buildings of 5 storeys or more would be substantially taller than their surroundings. Mid-rise building maps contained in Appendix 3 shows that opportunities for mid-rise buildings are generally concentrated within four different types of areas:

1. transition areas to Tall Building Zones;
2. along strategic road corridors;
3. within town centres; and
4. within or adjacent to areas which include buildings taller than the prevailing height or subject to substantial redevelopment.

22.29 Mid-rise buildings will be supported in Tall and Mid-Rise Building Zones identified in Appendix 3, subject to addressing criteria in Part C of the policy. Proposals for mid-rise buildings should not exceed the identified appropriate heights for each Mid-Rise Zone.

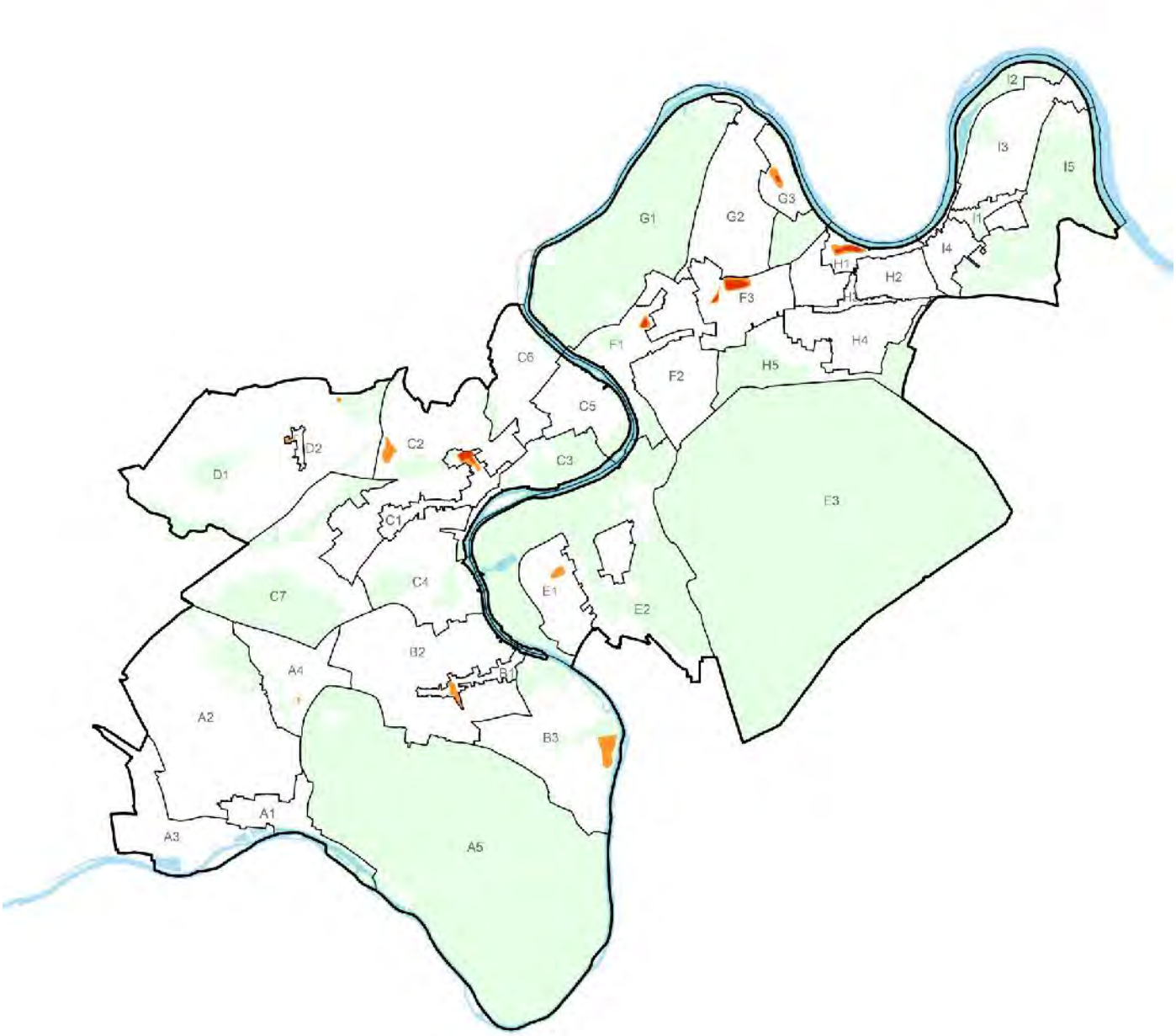
22.30 Proposals for mid-rise buildings may be considered suitable outside Tall and Mid-Rise Building Zones as per Part D of the policy and subject to addressing criteria in Part C. The Urban Design Study, which provides the basis of the locations of the Tall and Mid-Rise Zones, is a snapshot in time with regards to the character of the borough and the sensitivity and probability for change, as well as known sites that may become available for development.

22.31 Given the historic nature of the borough and presence of protected views, there is confidence that all potential sites for tall buildings have been identified through the Urban Design Study. There may, however, be further suitable sites for mid-rise buildings which become available later in the plan period which are not currently known. For example, land assembly could enable the creation of a larger site which allows for a comprehensive scheme with mid-rise at its centre while still integrating well with the locality, with lower height at the periphery to avoid imposing negatively on the surroundings. As such, proposals for mid-rise buildings may be appropriate outside of the defined zones, when a certain set of criteria is met (as listed in part D).

22.32 Applicants will be required to submit technical supporting information and graphic 3D modelling (e.g. enabled by VU.City), as defined within the LBRuT local validation checklist for all tall buildings applications. Through the design-led process all proposals for tall buildings will need to provide a sufficient level of information to demonstrate that potential impacts have been suitably identified and adequately addressed. Proposals will be resisted where they would result in unacceptable visual, functional, environmental and cumulative impacts that cannot be avoided or appropriately mitigated.

22.33 The Mayor of London ~~has advised that all referable residential development over 30m in height must include two staircases as a fire safety requirement. Similar measures are expected to come into force nationally via an amendment to Building Regulations following a~~ *and* Government ~~consultation in 2022~~ *have been introducing new fire safety requirements including a requirement of two staircases for new residential buildings in tall buildings, with this requirement becoming mandatory in all new residential buildings above 18m from 2026 through Building Regulations. Applicants are advised to consult the Government's most recent fire safety and high-rise residential buildings guidance for up-to-date information and requirements*. *Applicants are further advised that these* ~~The~~ measures are in addition to the fire safety requirements set out in London Plan Policy D12, with which all development is expected to comply*, and the Mayor's Fire Safety London Plan Guidance (LPG)*.

Map 22.1 Tall and Mid-rise Building Zones (with Character Areas)



Policy 46

Amenity and Living Conditions

A. All development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties and the visual amenity of the area as a whole. The Council will support development where it:

1. Ensures the design and layout of buildings does not have an unacceptable impact on levels of daylight and sunlight on the host building or neighbouring properties, including gardens and outdoor spaces; where existing daylight and sunlight conditions are already substandard, they should be improved where possible;
2. Ensures that adequate outlooks are provided for new occupants, and that heights, massing and siting of new development retains adequate outlooks for neighbouring occupants, avoiding any undue sense of enclosure;
3. Ensures that acceptable standards of privacy are provided and retained, without a diminution of the design quality; development should not result in unacceptable levels of overlooking (or perceived overlooking); balconies should not cause unacceptable overlooking or noise or disturbance to nearby occupiers;
4. Ensures that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting; visual amenity from adjoining sites and from the public realm should not be unacceptably compromised;
5. Ensures 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-climate effects;
6. Provides adequate outdoor amenity space for new occupiers in accordance with Policy 13 'Housing Mix and Standards ', which is free from excessive noise or disturbance, pollution, odour, sense of enclosure, unacceptable loss of privacy, wind and overshadowing.

B. Applicants are expected to have regard to the guidance set out within the Council's SPDs relating to design, including Village Planning Guidance, House Extensions and External Alterations, and Small and Medium Housing Sites, as well as other Local Plan policies on infill and backland developments and housing mix and standards.

C. Development will be expected to address London Plan Policy D13 on the Agent of Change principle, and accord with Policy 53 'Local Environmental Impacts'.

22.34 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 unreasonable impacts of new development.

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

22.36 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 loss of light (including to solar panels), loss of outlook, sense of enclosure, overlooking and loss of privacy (both actual and perceived), alterations to micro-climates and pollution from noise or light. Impacts 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.

22.37 Particular attention needs to be paid to these matters in order to address public concerns in relation to amenity and living conditions impacts. However, regard must also be had, as part of the assessment of a planning application, to the Council's duty 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 has a reasonable impact on amenity and living conditions.

Daylight, sunlight and solar glare

22.38 In assessing whether sunlight and daylight conditions are acceptable, the Council will have regard to the most recent Building Research Establishment (BRE) guidance, taking into account context and other material considerations. Assessment will apply for new development, and for properties affected by new development, to include inside buildings, gardens and open spaces.

22.39 Solar glare principally occurs when the sun is low in the sky and dazzles the eye either directly or indirectly via a reflected surface. Glare or dazzle can occur when sunlight is reflected from a glazed façade or area of metal cladding. This can affect road users, such as pedestrians, cyclists and drivers, and the occupants of adjoining buildings. The potential impact of glare or dazzle will need to be carefully considered and assessed where relevant to ensure there are no adverse impacts.

Visual intrusion, privacy and outlook

22.40 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 an on-site judgement.

22.41 The policy seeks to strike a balance between how developments are designed to enable a sense of community as well as offering people enough privacy in their homes. Whilst there will be some impact from any new development, the test is degree 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. Development should have regard to the Mayor's Housing Design Standards London Plan Guidance (consultation draft February 2022), which provides guidance on aspect, orientation, daylight and sunlight, including that the main living and eating spaces enjoy reasonable privacy.

22.42 For developments in Richmond, a minimum distance guideline of 20 metres between habitable rooms within existing residential development is usually viewed as appropriate for privacy reasons; a greater distance may be required for other reasons, or a lesser distance may be acceptable in some circumstances. These numerical guidelines should be assessed on a case by case basis, since privacy is only one of many factors in site layout design; the established pattern of development in the area (layout and height) may justify lesser distances. 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.

22.43 So as not to unnecessarily restrict density on certain sites, when designing buildings with regards to its impact on other buildings within the same development, additional measures can be applied to minimise overlooking, such as splays, angles of buildings, obscure glazing etc. The internal layout of buildings can also be coordinated so that residual overlooking is only between rooms of the same type and sensitivity (i.e. living rooms facing living rooms, and bedrooms facing

bedrooms). A Supporting Planning Statement should set out justification for reduced distances.

22.44 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.

22.45 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.

22.46 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 BRE guidance), overshadowing and 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 a material planning consideration.

22.47 The Council's SPDs, including on Householder Extensions and External Alterations, Residential Development Standards, Small and Medium Housing Sites (and any future updates to these SPDs) and the Urban Design Study, provide further guidance and illustrations on how to assess sunlight/daylight, overshadowing, visual intrusion, privacy and space between buildings.

Noise and plant equipment

22.48 Development should be designed to reduce the impact of noise to an acceptable level through the use of attenuation, distance, screening and layout/orientation, having regard to London Plan Policy D14 'Noise' and Policy 53. Local Environmental impacts.

22.49 Service equipment (including lift plant, air handling/extract, boiler flues, meter boxes, gas pipes and fire escapes) should be fully integrated into the building envelope or located in visually inconspicuous locations within effective and robust screening/enclosures, and should not cause disturbance through its operation.

23 Reducing the need to travel and improving the choices for more sustainable travel

Policy 47

Sustainable Travel Choices (Strategic Policy)

A. The Council will work with others to bring about safe, sustainable, accessible transport solutions to reduce the proportion of trips taken by private car, reduce traffic congestion, reduce air pollution, including carbon dioxide emissions, improve public health, and improve access to services and employment in accordance with the policies set out in the London Plan, Mayor's Transport Strategy, and the Council's own Active Travel Strategy. Planning applicants will therefore be expected to:

Location of development

B. Propose major developments (see Table 23.1 for a definition) in areas that ~~either~~ already have a Public Transport Accessibility Level of 4-6 or ~~if not~~ mitigate the impact of their development on the existing passenger transport network in accordance with Para. ~~110d~~ *114d* of the National Planning Policy Framework (NPPF). *The impact of all major developments will be assessed relative to current and forecast capacity and passenger trips on the passenger transport network.* Depending on the impact of the development relative to the capacity of the bus and rail network in its final assessment year, this may include applicants making financial contributions to increase capacity and/or improve infrastructure on the passenger transport network.

Active travel

C. Ensure that their proposed developments provide a high-quality walking and cycling environment both within the curtilage of the development and in its near vicinity so that occupants can make short journeys to local town centres, services, and work, by sustainable modes of travel and can benefit from high quality, safe access to public transport services. This may include paying for and completing off-site works on the adopted highway under S278 of the Highways Act 1980 to mitigate the impact of their development. All proposed pedestrian and cycle improvement works must have regard to the National Design Guide, the London Cycling Design Standards, Local Transport Note 1/20: Cycle Infrastructure Design, and Manual for Streets. All off-site highway works must meet technical standards set out by the Council's Traffic and Engineering team.

Inclusive mobility

D. Ensure that their development proposals provide safe and suitable access to and around their developments for disabled and other vulnerable road users in accordance with guidance set out in Manual for Streets and Inclusive Mobility: making transport accessible for passengers and pedestrians (Department for Transport, 2022).

Assessing the impact of developments

E. Demonstrate that their proposed developments do not a have a severe impact on the operation, safety, or accessibility of the local or strategic road network. Any impact on the local or strategic road network, including the impact of occupants parking vehicles on the carriageway, will need to be mitigated in accordance with para. 110d *of the September 2023 NPPF / paragraph 114d* of the *December 2023* NPPF.

F. All planning applications for major developments will need to include a full transport assessment and travel plan which must be completed in accordance with Transport for London (TfL) guidance. Applications for smaller developments must include a transport statement and travel plan statement, also completed in accordance with TfL guidance (see Table 23.1). Applications under a certain size will be expected to include a chapter about transport and accessibility in their Design and Access Statement.

River transport

G. Where appropriate, enable the River Thames to be used for passenger and freight transport as well as servicing and construction of their development proposals, through the provision, improvement, or retaining of relevant infrastructure including wharves, slipways, and piers.

Safeguarding routes and facilities

H. Where appropriate, ensure that their development proposals safeguard land required for transport schemes and infrastructure set out in the London Plan and/or the Council's Local Implementation Plan.

Taxis, coaches and private hire vehicles

I. Where appropriate, ensure that taxis, minibuses, coaches, and private hire vehicles can safely pick up and drop off their passengers. Where they have to use the highway to do this, applicants will need to pay the Council to implement Traffic Management Orders under the Road Traffic Regulation Act 1984 and/or may need to complete other highway works. Applicants should only propose using the existing highway for this when no on-site provision is possible.

Table 23.1 Transport Impact Assessment Thresholds

Land Use Class (GIA)	Cover as part of design and access statement	Transport statement and travel plan statement	Transport assessment and full travel plan
Food retail (E(a))	Under 250m^2	250m^2 – 800m^2	800m^2 or over
Non-food retail (E(a))	Under 800m^2	800m^2-1,500m^2	1,500m^2 or over
Financial and professional services (E(c i-iii))	1,000m^2	1,000m^2-2,500m^2	2,500m^2 or over
Restaurants and cafes (E(b))	Under 300m^2	300m^2 – 600m^2	600m^2 or over
Drinking establishments (Sui Generis)	Under 300m^2	300m^2 – 600m^2	600m^2 or over
Hot food takeaway (Sui Generis)	Under 250m^2	250m2 – 500m^2	500m^2 or over
Business (E (g i-iii)	Under1,500m^2	1,500m^2 – 2,500m^2	2,500m^2 or over
General industrial (B2)	Under 2,500m^2	2,500m^2 – 4,000m^2	4,000m^2 or over
Storage and distribution (B8)	Under 3,000m^2	3,000m^2 – 5,000m^2	5,000m^2 or over
Hotels (C1)	Under 30 beds	30 – 50 beds	50 beds or over
Residential institutions (Hospitals and Nursing Homes) (C2)	Under 30 bedrooms	30-50 bedrooms	50 bedrooms or over
Residential institutions (Residential education) (C2)	Under 50 students	50-150 students	150 students or over
Residential Institutions (Institutional Hostels) (C2)	Under 250 residents	250 – 400 residents	400 residents or more
Dwelling houses (C3)	Under 10 dwellings	10-80 dwellings	80 dwellings or more

Land Use Class (GIA)	Cover as part of design and access statement	Transport statement and travel plan statement	Transport assessment and full travel plan
Non-residential institutions including higher and further education (F1)	Under 500m^2	500m^2 – 1,500m^2	1,500m^2 or above
Primary and secondary education (F1)	Seek pre-app advice	Seek pre-app advice	Seek pre-app advice
Assembly and leisure (F1/F2)	Under 500m^2	500-1,500m^2	1,500m^2 or above
Sui Generis	Seek pre-app advice	Seek pre-app advice	Seek pre-app advice
Other uses falling within Class E	Seek pre-app advice	Seek pre-app advice	Seek pre-app advice

23.1 The borough is committed to promoting sustainable travel, decreasing car use and improving air quality. Ensuring that walking, cycling and public transport are the natural choice for trips to and from new developments is vital if these goals are to be achieved. The policies on Sustainable Travel Choices and Parking in the Local Plan should be read alongside those in the London Plan and the Mayor of London's Transport Strategy.

23.2 The Council has a Local Implementation Plan (LIP 3) adopted in 2019 detailing its vision for how the transport network will be transformed over the next 20 years. It includes a headline target for 75% of trips to be by sustainable modes (walking, cycling and public transport) by 2041, from a baseline of 61%. The plan also includes targets for expanding the cycle network, improving air quality, reducing road danger and increasing the use of public transport. Planning applicants proposing major developments will need to demonstrate how their proposals help meet these targets.

23.3 The Richmond Active Travel Strategy 2020 has been developed to provide detail on how the Council will support the objectives in the Local Implementation Plan, focusing on walking and cycling. The Local Plan policies seek to prioritise facilities for sustainable travel modes and promotes a Healthy Streets Approach in developments, as set out in Policy 1 'Living Locally and the 20-minute neighbourhood (Strategic Policy)' and in accordance with the London Plan policy T2.

Location of development

23.4 Developments that will generate a large volume of trips should be focused in areas with high Public Transport Accessibility Levels (PTALs) to help create the most sustainable transport environment. PTAL 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 to public transport. 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.

23.5 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 4-6 are considered to be appropriate locations for high trip generating development.

23.6 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.

Active travel

23.7 The Healthy Streets Approach underpins the Mayor's Transport Strategy and seeks to encourage more Londoners to use active travel by improving the quality and experience of being on our streets. The approach puts people, and their health, at the heart of decision-making, resulting in a healthier and more inclusive city where people choose to walk, cycle and use public transport. Policies and strategies are expected to focus on creating streets that are pleasant, safe and attractive, where noise, air pollution, accessibility and lack of seating and shelter are not barriers to prevent people – particularly the most vulnerable people – from getting out and about. These objectives are interlinked with this Local Plan's priorities around living locally and minimising greenhouse gas emissions.

23.8 The Council's Active Travel Strategy aims to increase the number of trips in the borough taken by walking and cycling, as both standalone trips and as part of longer trips involving public transport. Objectives include: to support local walking and cycling trips using the Healthy Streets Approach; create a high-quality core cycle network connecting popular destinations; make improvements to clean-air walking and cycling routes away from roads; and improve awareness of local walking, cycling and running routes.

23.9 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.

23.10 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. Cycle parking should, at least, be provided in accordance with the minimum standards in the London Plan.

23.11 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 28 'Local Character and Design Quality (Strategic Policy)', gated developments will not be permitted.

23.12 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, introducing traffic calming measures where needed, 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 Cycling 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

23.13 The Council will ensure that there is signage and way marking of the three strategic walking routes identified in the London Plan, and of the main cycle routes (see The Council's Active Travel Strategy),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

23.14 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. Reference should be made to the priorities identified in the Local Implementation Plan.

Inclusive mobility

23.15 New development must be accessible and inclusive for a range of users, including disabled people and people with long-term health conditions, by adopting an inclusive design approach. This includes the approach to parking, a wholistic approach to streets, and wider way-finding and legibility. For technical guidance on this subject, applicants are advised to use the latest guidance on Inclusive Mobility. Applicants should also seek advice from Borough Engineers on this subject if they intend to carry out new works on the highway.

Assessing the impact of developments

23.16 All planning applications will be required to demonstrate that their proposed developments do not a have a severe impact on the operation, safety, or accessibility of the local or strategic road network. The method of assessment required will depend on the use(s) being proposed and its size, in accordance with the thresholds in Table 23.1. The assessment requirements for some uses now falling within Class E of the Use Classes Order will need to be considered on a case-by-case basis if the particular Class E use is not specified in Table 23.1 ('Other uses falling in Class E'). Where necessary and justified, the Council will use conditions and/or planning obligations to limit uses consented within Class E in order to achieve the objectives of this policy and in line with the NPPF and accompanying PPG to assess the significant impacts from the development on the transport network or on highway safety, and to mitigate the impacts of development given the range of uses that need to be fully assessed. Matters to be included in Transport Assessments and Transport Statements are set out in the London Plan, the latest Department for Transport as well as Transport for London guidance, and the Council's Local Validation Checklist and Transport SPD.

23.17 *As part of the Healthy Streets Approach, all new developments need to make it safe and attractive to walk, cycle and use public transport. All major developments should include an Active Travel Assessment as part of their transport assessment. In instances where the applicant is required to submit a Transport Statement (see Table 23.1), in line with TfL Guidance this should include an Active Travel Zone (ATZ) Assessment. In instances where the applicant is required to submit a Transport Statement, this should be assessed as part of the baseline profile of existing conditions for pedestrians and cycling and the ease of access to public transport.*

23.18 Planning applicants are strongly advised to seek pre-application planning advice regarding the parameters of any assessment of the transport impacts of their development proposals. For major development proposals, they are also advised to seek pre-application transport advice from Transport for London (TfL) Officers as well as Borough Officers.

23.19 In instances where the applicant is required to assess the transport impacts of their development as part of their design and access statement (see Table 23.1 above) they will need to include:

1. A description of the development proposals
2. A description of the local highway and passenger transport network
3. Trip generation details, using TRICS for residential developments of 10 dwellings or more, or for other land uses that are at or above the threshold at which a transport statement and travel plan statement is required (see Table 23.1).
4. *Details of how the proposed development will provide a high-quality walking and cycling environment that promotes active travel*

5. A vehicular parking stress survey if the required off-street vehicular parking standard cannot be met (see Policy 48 'Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management')
6. Details of how the proposed development will be serviced
7. Details of off-street car and cycle parking (see Policy 48 'Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management')
8. Details of how any significant impacts will be mitigated, including on-street vehicular parking.

23.20 *Proposals for new development will include any necessary mitigation measures required as a result of development to be funded and/or delivered by the developer to ensure the continued safe and efficient operation of the strategic and local road and transport networks. In this regard, the Council will continue joint working with adjoining authorities and TfL to establish the impacts of major development proposals on the local road and transport networks both within and outside the borough and how these might be mitigated and funded, in order to ensure there is no adverse significant impact on these networks and to continue to enable and encourage cross-boundary active and sustainable travel.*

23.21 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

23.22 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 low carbon emissions 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 Policy 34 'Green and Blue Infrastructure (Strategic Policy) ', Policy 40 'Rivers and River Corridors 'and Policy 41 'Moorings and Floating Structures', this policy supports the multi-functional use of the Blue Ribbon Network.

Safeguarding routes and facilities

23.23 The need to ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system is identified in the London Plan. The Council will ensure that development proposals safeguard land required for transport schemes and infrastructure unless alternative facilities are satisfactorily provided. The loss of existing bus garages will be resisted, to safeguard capacity for efficient and sustainable operation of the network, unless it is demonstrated, and confirmed by Transport for London, that it is operationally no longer needed or enhanced reprovision has been made as part of the redevelopment of the site or elsewhere in a convenient and accessible alternative location.

23.24 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

23.25 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. Transport schemes are set out in the Council's Local Implementation Plan and where appropriate in the site allocations of the Local Plan, and/or in planning briefs.

23.26 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 key way that the Council can gain the necessary resources to assist in the delivery of this vital infrastructure.

Taxis and private hire vehicles

23.27 Taxi ranks should be conveniently located close to the venue they serve and accessible for all with adequate space for customers to queue. Taxi ranks should be 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. Transport for London's Taxi and Private Hire Guidance for Developers (2018) should be referred to when planning for taxi provision.

Policy 48

Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management

A. The Council will require new developments to make provision for the accommodation of vehicles to provide for the needs of the development while minimising 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.

Vehicular and Cycle Parking Standards

B. Planning applicants will therefore be expected to provide off-street vehicular and cycle parking, including electric vehicle charging points, in accordance with standards set out in Policies T5 and T6.1 – T6.5 and Tables 10.2 – 10.6 of the London Plan. Electric vehicle charging points must be provided in a way that ensures the development is safe for other road users.

C. Planning applicants need to have regard to the London ~~Cycle~~ *Cycling* Design Standards when proposing off-street cycle parking for their developments, to deliver cycle parking that is fit for purpose, secure and well-located (preferably close to the pedestrian entrance of the main building), and easy to use by people of all ages.

Applications for Dropped Kerb and Crossover Accesses to allow Front Garden/Yard Parking

D. Front yard/garden perpendicular parking reduces the quality and safety of Richmond's footways for pedestrians and road users with disabilities and reduce on-street vehicular parking capacity. Applications for new vehicular crossover or dropped kerb accesses will be assessed strictly in accordance with the guidance set out in the London Borough of Richmond's Transport Supplementary Planning Document (adopted July 2020) *and the latest highways authority guidance*.

Car-Free Developments

~~F~~*E*. Car-free developments may be appropriate where:

1. The public transport accessibility level (PTAL) is 3 or above
2. Off-street disabled vehicular parking can be provided in accordance with standards set out as per part A above.

3. Cycle parking can, at least, be provided in accordance with the minimum standards set out in the London Plan and designed in accordance with the London ~~Cycle~~ *Cycling* Design Standards.
4. The development is in a controlled parking zone and the applicant is prepared to enter into a legal agreement which excludes all occupants from vehicular parking permits within this, including season tickets in Council-managed car parks.
5. In cases where there is no CPZ that occupants can legitimately be excluded from or that operates for only a small number of hours per day, the applicant can demonstrate, through a parking stress survey, that their development will not increase on-street vehicular parking stress above 85% of total on-street vehicular parking capacity. In certain cases, where a development is forecast significant impact on on-street parking stress in an area, mitigation may be sought in the form of financial contributions towards the cost of reviewing and changing an existing CPZ or implementing a new one.
6. Household and commercial refuse and recycling collectors can service the development safely in accordance with the Council's Refuse and Recycling Storage Requirements Supplementary Planning Document (2022).
7. It can be demonstrated that other commercial and emergency service vehicles can service the development in accordance with standards set out in Manual for Streets (see part L of this policy).
8. The applicant is prepared to consider other forms of mitigation such as the provision of free membership of a local car club for occupants, or, in instances of major developments, can provide one or more car club spaces on the site.

The Provision of Vehicular and/or Cycle Parking Infrastructure on the Highway

~~G~~*F*. The Council will not encourage the provision of disabled vehicular parking space on the highway to enable planning applicants to meet the standards for disabled vehicular parking set out above.

~~H~~*G*. Planning applicants will be expected to provide all long and short stay cycle parking off-street. If this is not possible, they will need to contribute to the cost to the Council of installing bike hangars or other cycle stands, including TMOs or other highway works needed to facilitate this.

Car Club Bay and Membership Provision

~~I~~*H*. Applicants proposing developments of 100 dwellings or above will be expected to provide one off-street car club space per 100 dwellings, and 1 space per 200 dwellings thereafter, and to secure an accredited car club operator to operate the car club from the spaces provided, subject to the operator considering it commercially viable, and will also be expected to fund the cost of membership of the car club scheme to which the car belongs to all the first occupants of the site for a minimum of three years.

~~J~~*I*. Where applicants propose developments with fewer than 100 dwellings, planning applicants will be expected to fund the cost membership of a nearby car club scheme to all the first occupants of the site for a minimum of three years. This will be secured through an S106 legal agreement.

Freight and Servicing

~~K~~*J*. Applicants proposing major developments (see Table 23.1 within Policy 47 'Sustainable Travel Choices (Strategic Policy)') will need to demonstrate that all servicing can take place off-street. If this is not possible, they may, depending on the number of servicing trips forecast and the potential impact on highway safety, need to pay for mitigation in the form of Traffic Management Orders and/or S278 highway works that will show their development will not have a severe impact on the safe use of the highway by other road users in accordance with Para. 110b *and d of the September 2023 NPPF / para. 114b* and d of the *December 2023* NPPF.

~~L~~*K*. All developments will need to demonstrate that refuse, recycling, commercial, and emergency service vehicles can service their development safely in accordance with guidance set out in Manual for Streets, Transport for London (TfL)'s guidance on delivery and servicing plans, and the Borough's Supplementary Planning Document Richmond Refuse and Recycling Storage Requirements. They will need to do this through a delivery and servicing management plan.

Construction Traffic/Logistics Management

~~M~~*L*. Planning applicants proposing major developments will be expected to submit a Construction Logistics Plan (Construction Management Plan) with any planning application. This will need to be completed in accordance with TfL guidance and the Council's guidance.

~~N~~*M*. Planning applications proposing developments that are below the size at which a transport statement and travel plan statement are needed (see Table 23.1 within Policy 47 'Sustainable Travel Choices (Strategic Policy)') will be dealt with on a case-by-case basis and may be asked to provide a Construction Logistics Plan. Where works may involve significant impact to the highway, neighbours, or the wider highway network, a Construction Logistics Plan (Construction Management Plan) will be required.

23.28 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 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.

Vehicle and cycle parking standards

23.29 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.

23.30 To mitigate the impact of their proposed development on the level of on-street vehicular parking stress in their local area, planning applicants proposing developments located in an area covered by a controlled parking zone (CPZ) , or proposing developments in areas that might be covered by a CPZ in the future pending a review of the area and a statutory consultation process carried out by the Council's Parking Policy team, may be asked to enter into an S106 legal agreement which will preclude all occupants, with the exception of those holding blue badges for disabled motorists, of that development from purchasing vehicular parking permits within any controlled parking zone (CPZ) or any Council-managed carpark within the Borough of Richmond-Upon-Thames. This will depend on:

1. The size of their development (see Table 23.1 within Policy 47 'Sustainable Travel Choices (Strategic Policy)')
2. The number of off-street vehicular parking spaces proposed, including disabled parking spaces
3. The proposed land uses
4. The level of in or out-commuting by car in the local area
5. The level of household car ownership within the local area
6. The level of on-street vehicular parking stress in that area (see below)
7. The level of existing take-up of CPZ permits within the particular CPZ

23.31 Such restriction would be secured by excluding the address from the schedule of streets in the relevant road traffic order that created or creates the Controlled Parking Zone in which the property is situated, by restricting under section 106 of the Town and Country Planning Act 1990 the disposal of an interest in relevant properties unless a person disposing advises the person acquiring of the non-availability of residents or business on-street parking permits and/or through Section 16 of the Greater London Council (General Powers) Act 1974 (or any statute revoking or re-enacting that Act).

23.32 Depending on the above factors, applicants may be asked to submit an on-street vehicular parking stress survey, completed in accordance with the Council's guidance. Applicants are strongly advised to seek pre-application transport advice regarding the likelihood of occupants of their development being excluded from any CPZ or the need for a vehicular parking stress survey before they submit any planning application.

23.33 Commercial occupants of any development will be limited to no more than five controlled parking zone permits per business. Applicants proposing Use Class F or Class E(e) or (f) and/or sui generis land uses will be excluded from the CPZ their proposed development is located within.

Applications for Dropped Kerb and Crossover Accesses to allow Front Garden/Yard Parking

23.34 New dropped kerb and vehicular crossover accesses reduce the quality and safety of the pedestrian environment, particularly for disabled road users, result in higher road maintenance costs for local taxpayers, and result in the loss of on-street vehicular parking space in a Borough in which household car ownership levels are above the average for London. Applicants should refer to the Council's Transport SPD, including for guidance on selection of materials and landscaping to diminish the negative impacts of additional hard surfaces in front gardens if a new crossover is being proposed*, along with the updated highways authority guidance*.

23.35 The Council will not remove or reposition trees to allow for the implementation of a vehicular crossover or drop kerb. Where a tree has been removed, the location will be reserved for a replacement tree, the Council will not agree to the construction of a vehicular cross over or drop kerb in its place. See Policy 42 'Trees, Woodland and Landscape' which recognises the value of trees in the borough.

Car-free developments

23.36 Car-free developments may be acceptable where they meet the criteria in part C of the policy. Developers should contact the Council's transport planners at an early stage to discuss parking requirements (transportation@richmond.gov.uk). Developers may be required to undertake local street parking surveys to demonstrate the capacity of the highway to accommodate additional parking demand. Development, particularly larger development, is commonly excluded from eligibility for existing or future street parking permits. Applicants might also be asked to make a financial contribution towards the review of on-street parking in the area in which their proposed development is located, and/or the design or res-design of a CPZ which will mitigate the impact of their development on on-street parking stress.

The Provision of Vehicular and/or Cycle Parking Infrastructure on the Highway

23.37 Disabled parking spaces are expected to be provided off-street within developments. This is because household car ownership levels in the Borough are above the London average and, as a result, on-street vehicular parking space is scarce. Also, these spaces may not be able to be reserved for residents of the development.

23.38 Cycle parking facilities on the highway cannot be reserved especially for occupants of for visitors to any development and can be used by any member of the public who wishes to use them. Therefore, all short and long-stay cycle parking is expected to be provided off-street where feasible.

23.39 Where it is not possible to provide off-street short and long stay cycle parking in accordance with the standards set out in part A planning applicants will be expected to contribute towards the cost of installing bicycle hangars or Sheffield stands on the highway where there is local support for the Traffic Management Order required to install them. This will be secured through a S106 legal agreement.

Car Club Bay and Membership Provision

23.40 The Council encourages the use of car clubs as an alternative to private car ownership. Car clubs can help reduce levels of household car ownership, the number of journeys taken by car, and the need for off and on-street vehicular parking space.

23.41 Car club spaces should be provided off-street where possible. If this is not possible, the applicant will be expected to pay for the cost of a Traffic Management Order and, if necessary, S278 highway works, to install any car club bays on the highway.

23.42 Car club vehicles should also be available for use by members of the public for the required fee and the operator should be accredited by CoMoUK or otherwise approved by the Council.

Freight and servicing

23.43 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.

23.44 As stated above, planning applicants are strongly advised to seek pre-application transport advice before submitting their planning application(s). Officer advice in response to this can include advice on servicing and refuse/recycling collection. Regarding refuse and recycling storage and collection, applicants must have regard to LBRuT's Refuse and Recycling: Storage and Access Requirements for New Developments Supplementary Planning Document (2022) which can be accessed at: Refuse and Recycling: Storage and Access Requirements for New Developments Supplementary Planning and regarding the management of deliveries and servicing, need to have regard to Transport for London's Delivery and Servicing Plan Guidance (TfL, 2020) at: London's Delivery and Servicing Plan Guidance

Construction traffic/logistics management

23.45 Construction Logistics Plans are also referred to as Construction Management Plans. Applicants should complete and submit a Construction Management Plan using the Council's latest pro-forma CMP template here: Construction Management Plan Guidance

23.46 Where applications do not require a formal CMP, applicants will be expected to pay for the cost of any works on the highway that will be needed to facilitate safe construction access and egress such as temporary traffic management orders (TTMOs) to close road space, the suspension of on-street vehicular parking bays, the installation of new vehicular crossover accesses, or the reinforcement of existing ones so that they can accommodate construction vehicles safely. The appropriate licences must be applied for prior to commencement.

23.47 As stated above, planning applicants are strongly advised to seek pre-application transport advice before submitting their planning application(s). Officer advice in response to this can include advice on construction traffic management.

23.48 All basement applications require a CMP. Further guidance is contained in Policy 53 'Local Environmental Impacts'. If the retaining walls of any basement are 3m or less from the highway boundary, all basement proposals will, in addition to requiring

planning permission, require an approval in principle from the London Borough of Richmond's Highway Structures Engineer. This is to protect the structural integrity of the highway.

24 Securing new social and community infrastructure to support a growing population

Policy 49

Social and Community Infrastructure (Strategic Policy)

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; and
4. is in accordance with Policy 1 'Living Locally and the 20-minute neighbourhood (Strategic Policy)'.

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 for which there is a local need 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 18 months in line with the requirements set out in Appendix 2.

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 should be considered.

E. Where a scheme proposes 100% genuinely affordable housing and meets the requirements of Policy 11 'Affordable Housing (Strategic Policy) ' in terms of mix, tenure and affordability, the proposal will not be required to satisfy parts C.3 and D of this policy as above.

Impacts on existing infrastructure

F. 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. Development proposals need to fulfil the requirements of Policy 51 'Health and Wellbeing (Strategic Policy)' Section B (1) in relation to the provision of Health Impact Assessments.

24.1 Social and community infrastructure facilities provide for the health, welfare, social, education, spiritual, recreational, leisure and cultural needs of the community. 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. The COVID-19 pandemic has highlighted just how important social and community infrastructure is to the local community. It is important that these facilities and services continue to meet people's needs at all stages of their lives and are accessible to all.

24.2 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. This approach also reflects London Plan Policy S1. 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 whether any facility or service is considered to be a social infrastructure or community use. The pre-application process is encouraged and on specific schemes may clarify which policies and requirements apply. 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.

24.3 Infrastructure provision and needs have been identified with the relevant partner organisations and are set out in the Council's Infrastructure Delivery Plan 2023. There is a need for nursery, education and health provision across the borough. More specific requirements for community facilities may be identified by local communities, such as a Neighbourhood Plan. The London Plan also seeks to conserve cultural infrastructure, as set out in London Plan Policy E10, and the GLA have developed a snapshot mapping the existing cultural infrastructure. The Council will work with partners including public and private infrastructure providers and the community and voluntary sector in ensuring the provision of services.

24.4 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.

24.5 The COVID-19 pandemic has had a widespread impact on how services and support are delivered to local people, and over time the infrastructure needed to deliver them may change. However in many areas, it has brought a focus on having local, community hubs, as part of "Living Locally" and adaptable spaces bringing opportunities for interaction. In addition, the Government's changes to the Use Classes affect social infrastructure and community infrastructure. Class F1 includes learning and non-residential institutions and Class F2 local community uses including halls and community spaces, indoor swimming pools and areas for outdoor sport or recreation. Class E is a wide range of commercial, business and services including gyms, indoor sport, creches, medical and health services. While this Plan supports provision of social and community infrastructure for meeting local needs, the flexibility introduced by Government through Use Class E (commercial, business and service uses) does in principle allow for changes of use both to and from other Class E uses for some types of social and community infrastructure, provided there are no restrictive conditions on a specific property. The policy approach to retaining existing social and community infrastructure and assessing new or improved social and community infrastructure set out above will apply where planning permission is required for a change of use, or to extensions and new development. Where necessary and justified, the Council will use conditions and/or planning obligations to limit uses consented within Classes E and F in order to achieve the objectives of this policy and in line with the NPPF and accompanying PPG to ensure provision of social, recreational and cultural facilities and services to meet community needs and to mitigate the impacts of development given the range of uses that need to be fully assessed.

New social and community infrastructure

24.6 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.

24.7 Need is identified on an evidential basis from the Council and its partners strategies and plans, including:

1. The Council's Infrastructure Delivery Plan
2. The Council's Joint Strategic Needs Assessment (JSNA)
3. The Council's School Place Planning Strategy and Childcare Sufficiency Assessment
4. The Council's Cultural Partnership Strategy and Culture Richmond 2021-2031
5. Estates Strategies produced by health bodies, such as the NHS England and South West London Integrated Care System
6. Government departments' Estates Strategies
7. The Metropolitan Police Authority's Estates Strategy
8. Other local evidence such as community needs identified as part of Neighbourhood Plans.

24.8 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. There may be relevant standards for new social and community infrastructure covering regulatory aspects for the specific type of provision, for example for health and care facilities the Department for Health and Social Care (DHSC)'s Health Building Notes provide guidance on the design and planning of new healthcare buildings and their immediate environment.

24.9 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, voluntary sector groups 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 secured through community use agreements as part of a legal agreement. 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.

24.10 The Council's Indoor Sports Facility Needs Assessment highlights the need for new facilities within the borough and will be updated in 2023~~3~~5. Where possible and feasible, such provision should be provided on-site in line with the Council's Indoor Sports Facility Needs Assessment. The supporting text to Policy 37 deals with the use of Community Use Agreements and artificial pitches, which may also be relevant to indoor facilities.

Loss of social or community infrastructure

24.11 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. As outlined above, the flexibility for change of use within Class E means that a wide range of social and community infrastructure uses can occur without the need for a planning application and should improve the prospects of finding an alternative social and community infrastructure use.

24.12 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, the requirements of Policy 51 Health and Wellbeing will also need to be addressed and written agreement from the Southwest London Integrated Care System, 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 for which there is a local need is assessed. This should include a full and proper marketing exercise ongoing for a period of at least 18 months. 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 2. 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.

24.13 Proposals that could result in the loss of an existing indoor sport facility will also be assessed against the Council's Indoor Sports Facility Needs Assessment and the criteria as set out in the NPPF. Early engagement with Sport England is encouraged where a proposal affects an existing indoor sport facility.

24.14 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 reprovision which confirms that the disposal of assets is necessary to ensure continued delivery of social infrastructure and related services, for example, NHS service transformation and estate strategies, this will be taken into account by the Council when assessing proposals against the criteria set out in this policy.

24.15 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.

24.16 In a Borough which has such high land values and an acute need for affordable housing, the Council will consider an exception to parts C.3 and D of this policy, where a scheme proposes the redevelopment or change of use of the site to 100% genuinely affordable housing, and where such is in accordance with Policy 11 Affordable Housing in terms of mix, tenure and affordability. Part C.1 or C.2 would still need to be addressed first. This is to assist in meeting local priority needs, in recognition of the wider community benefits of delivering affordable housing. If an economic viability case is put forward, at the point of consideration of a planning application or through any subsequent variation, to justify less than 100% affordable housing or a different tenure mix that is not policy compliant, then this exception to parts C.3 and D would not apply.

Impacts on existing social infrastructure

24.17 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. For applications for 10 or more residential units, this should be addressed in a Supporting Planning Statement and a Health Impact Assessment, as required (in accordance with the Local

Validation Checklist and Policy 51 and/or through an Environmental Impact Assessment (EIA) for projects above the threshold. Where necessary, measures will need to be put in place to mitigate 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

24.18 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. The Council manages and displays this list on the Council's website. 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.

24.19 Loss of Assets of Community Value will be strongly resisted in line with the requirements and criteria set out in this policy. Where premises have been registered with the Council as an Asset of Community Value under the Localism Act 2011, this is likely to be a material consideration in the determination of applications for the site for change of use to non-community related use.

Policy 50

Education and Training (Strategic Policy)

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, childcare 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. Early engagement is required with the Council (Achieving for Children) where there is a loss or proposed gain in pre-school, primary and secondary places; evidence of discussions between the Council (Achieving for Children) and providers will be required to demonstrate how needs will be met, and should be submitted with an application.

C. Proposals for education and childcare facilities will be considered against the criteria set out in London Plan Policy S3 Education and childcare facilities parts B and C.

D. The Council will promote local employment opportunities and training programmes in accordance with London Plan Policy E11 Skills and opportunities for all, and seek opportunities to support local procurement of goods and services. 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. This will secure

employment, training/skills development opportunities for local people. If it is accepted it is not possible to deliver this through the development, developers will be required to make a financial contribution to support local employment, education, and skills initiatives.

24.20 London is one of the world's global centres for education and the London Borough of Richmond plays a key role in fulfilling this position. 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.

24.21 The Council takes a proactive, positive and collaborative approach to meeting school place requirements. This includes working with partners, including the Education and Skills Funding Agency as well as educational providers, to provide the quantity and diversity of school places needed within the borough, and childcare. Achieving for Children provide the Council's children's services.

24.22 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.

24.23 Co-location and multi-use of education facilities with other social infrastructure and community uses will be encouraged where practicable, in line with Policy 49 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

24.24 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.)

24.25 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.

24.26 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 and Skills 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, 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.

24.27 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. Although there has been significant progress made in recent times, this has involved the usage of much of the usable space on existing schools' sites. The Strategy 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. The potential medium to longer-term implications on the COVID-19 pandemic in terms of birth rates, migration, and socioeconomic factors which may impact on future demand for school places, will be kept under review. At this stage, all land and buildings in education use are safeguarded, such as the former Strathmore School site in Meadlands Drive, Petersham.

24.28 In addition, the Council is required to plan for an increase in school places for children and young people with special educational needs and disabilities (SEND). There are over 4,000 children and young people aged between 0 and 25 years with SEND living in the borough. About 1,600 of these have an Education Health and Care Plan (EHCP), whilst the remainder may be receiving SEND support at school, additional support in early years or post-16 education provision such as a nursery or college, or following a vocational pathway such as a supported apprenticeship. These needs are forecast to grow in the School Place Planning Strategy.

24.29 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 period. In this context, the Council works closely with the Education and Skills 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. Access by public transport should be a consideration in reducing traffic impacts when identifying locations for new educational facilities.

24.30 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.

24.31 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:

- Stag Brewery, Mortlake: provision of a new 6-form entry secondary school, including sixth form;
- Barnes Hospital, Barnes: provision of a Special Education Needs school.

24.32 The Council will work with the Education and Skills 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.

24.33 In addition, the Council is committed to future working with St Mary's University to address the growth in university places by developing a Masterplan in partnership with the University.

Early years and childcare

24.34 Having sufficient childcare in the borough means that families are able to find childcare that meets their child's learning needs and enables parents to make a real choice about work and training. This applies to all children from birth to age 14, and to children with disabilities. Some children are entitled to free childcare, funded by the government. The Childcare Act 2006 places a duty on the Council to ensure that there are enough childcare places to enable parents to work or train, and there is also a statutory duty to ensure that there are sufficient funded early education places for eligible two, three and four year-olds within the borough.

24.35 The Council's Childcare Sufficiency Assessment (CSA), which is reviewed regularly, uses data about the need for childcare and the amount of childcare available, to plan how to support the local childcare economy. There are private, voluntary, and independent (PVI) providers, and there are different types of provision, including through the use of childminders. The CSA provides a snapshot, and the situation can change rapidly. The medium and longer-term impacts of the COVID-19 pandemic on working patterns, and the locations where childcare is required, are being kept under review.

24.36 Providers are encouraged to have early discussions with the Council / Achieving for Children Early Years Provision, where proposals affect existing or proposed nursery / pre-school places including funded places and spaces for disadvantaged children. Evidence of such discussions should be submitted with an application to assist in establishing how a proposal meets local needs and priorities, which can respond to changes within the local market while aiming to maintain a mix of provision to allow for choice. New childcare facilities, or extensions to existing provision, should be in an accessible location, providing safe, suitable and accessible space including to outdoor space, taking into account Ofsted requirements.

24.37 While this Plan supports provision of nurseries for meeting local needs, the flexibility introduced by Government through Use Class E (commercial, business and service uses) does in principle allow for changes of use both to and from other Class E uses and nurseries, provided there are no restrictive conditions on a specific property. The policy approach to retaining existing nurseries and assessing new or improved nurseries set out above will apply where planning permission is required for a change of use, or to extensions and new development. The Government's permitted development rights for a change of use from Class E to residential also allow for the impact on the adequate supply of nursery services, which will follow the approach set out above. Where necessary and justified, the Council will use conditions and/or planning obligations to limit uses consented within Class E in order to achieve the objectives of this policy and in line with the NPPF and accompanying PPG to ensure provision of required childcare to meet local needs.

Employment and skills training

24.38 The Council will promote local employment opportunities and training programmes, particularly where there are opportunities arising from developments. Securing the skills to support residents into sustainable employment is a key priority for the Council to support the local economy, to raise the bar further for those with higher levels of skills than London averages and make sure some residents with lower skills are not missing out economically. Maximising local labour will also help reduce the need to travel. 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. This may be particularly important where the COVID-19 pandemic has significantly affected specific sectors in the borough.

24.39 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, including how this will be resourced. Such an agreement can make use of existing schemes, such as Richmond Work Match, Way2Work, Construction Training Initiative, schemes run by Registered Providers and developers, provided these manage the development related job opportunities and fulfil the Council's targets and monitoring.

24.40 The number of jobs generated by a development will vary depending on its scale, as well as the end use being proposed. The obligation set out in part ~~B~~ *D* of the policy for an LEA between the developer and the Council will therefore apply to:

- All residential developments providing 50 units or more; and
- All commercial developments consisting of 400 sqm or more of employment space.

24.41 The selection of these thresholds is to ensure that the requirement for an LEA is applied to those major developments where there is likely to be scope to provide a significant contribution on site to employment and training opportunities in the borough. Developers are however also encouraged to enter into an LEA on all development sites expected to be above 20 FTE, even if they fall below the above size thresholds.

24.42 The details of the LEA will be subject to negotiation, tailored to site specific circumstances and proportionate to the scale of development proposed, and require developers to bring about the necessary provision to meet the obligations, using reasonable endeavours to incorporate in their relevant contracts. The delivery of the LEA will be fulfilled through the agreement of an Employment and Skills Plan (ESP). The strategy should set out how the developer will work to address the Council's Employment and Skills Strategy (2021, updated September 2022) and existing employment and skills initiatives, with reference to specific and measurable outputs, key delivery partners, how this will be resourced and details on the delivery timeframes for each output. There should be consideration of areas with higher concentrations of income-deprived people and providing opportunities for refugees and people seeking asylum. The ESP will set out the regular monitoring and review of performances against the targets that will be reported to the Council.

24.43 There should be early discussions, particularly on major developments, with the Council's Economic Development Office (EDO) to agree the terms, and the Planning Obligations SPD (2020) sets out detailed guidance on LEAs. The Council will also seek opportunities to ensure that local businesses benefit from the construction and end use of developments. Developers will be expected to work with the Council to promote and advertise tender opportunities and to achieve the procurement of construction contracts and goods and services from companies and organisations based in the borough.

24.44 A developer can set out justification as to why it may not be possible to deliver any of the requirements highlighted, if there are circumstances specific to the scheme (e.g. specialised labour requirements from the end user) such that direct provision is not operationally feasible, or that an alternative means of delivery would result in a more effective outcome. There should be early engagement with the Council to discuss the specific circumstances of the scheme. If those circumstances are accepted by the Council, then financial contributions via Richmond Work Match towards local employment training schemes, job brokerage services or other business support initiatives will be required – related to the average cost to the Council of supporting and/or placing Richmond residents in jobs, training places and apprenticeships (an update to the Planning Obligations SPD will set out further details).

25 Creating safe, healthy and inclusive communities

Policy 51

Health and Wellbeing (Strategic Policy)

A. The Council will support development that promotes healthy lifestyles and reduces health inequalities, and results in a pattern of land uses and facilities which provide:

1. Access to sustainable modes of travel such as safe cycling routes, safe and attractive walking routes and easy access to public transport to promote active travel and reduce car dependency as well as air pollution, supporting the Healthy Streets approach as set out in Policy 1 'Living Locally and the 20-minute neighbourhood (Strategic Policy)'.
2. Access to green infrastructure, including river corridors, local open spaces as well as leisure, recreation and play facilities to encourage physical activity, as set out in Policy 37 'Public Open Space, Play, Sport and Recreation '.
3. Access to local community facilities, services and shops which encourage opportunities for social interaction and active and healthy living in accordance with Policy 1 'Living Locally and the 20-minute neighbourhood (Strategic Policy)', as well as contributing to dementia-friendly environments.
4. Access to local healthy food, for example, allotments and food growing spaces including rooftop gardens, as set out in Policy 52 'Allotments and Food Growing Spaces' and food growing spaces.
5. Access to free public toilet facilities which are open to all residents and visitors in major developments that are open to the public, and free ‘Changing Places’ toilets where appropriate as set out in London Plan Policy S6 (linked to the Council's Community Toilet scheme); and retain existing public toilet facilities.
6. Access to free drinking water at appropriate locations in new or redeveloped public realm, in accordance with London Plan Policy D8.
7. A safe, inclusive development layout and public realm that considers the needs of all, including the older population and disabled people, in accordance with London Plan Policy D5.
8. Active Design which encourages wellbeing and greater physical movement as part of everyday routines.
9. Access to healthy housing in accordance with Policy 13 'Housing Mix and Standards ' and Policy 28 'Local Character and Design Quality (Strategic Policy)' quality, to create internal environments and associated external spaces that support the health and wellbeing of future occupiers.

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. An Inclusive Design Statement is required as part of the Design and Access Statement.

3. The Council will refuse proposals for new fast food takeaways located within 400 metres of the boundaries of a primary or secondary school in order to restrict the availability of unhealthy foods to reflect London Plan Policy E9.
4. Existing health facilities will need to be retained where these continue to meet, or can be adapted to meet, residents' needs.
5. 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 Policy 49 'Social and Community Infrastructure (Strategic Policy)'.

Healthy Lifestyles

25.1 Health and wellbeing is a cross-cutting theme, which has links with many other parts of the Local Plan. A healthy place is one which encourages, supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing. It is a place which is inclusive and promotes social interaction. Well-designed homes and buildings that are functional, accessible and sustainable, will enable healthy, comfortable and safe internal and external environments. Healthy places meet the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.

25.2 The Richmond Health and Care Plan, developed in partnership with local people, voluntary community groups and health and care partners in the borough of Richmond, sets out a vision for improving the health and wellbeing of local people. This emphasises the whole life course of 'Start Well, Live Well and Age Well', which encompasses residents of all ages and demographics, that is also the basis of the Joint Health and Wellbeing Strategy. The Council's Prevention Framework 2021 to 2025 aims to embed prevention in the Council's wider work, particularly through the environment, to promote positive health and wellbeing and to address health inequalities.

25.3 The London Plan sets out that many determinants of health and wellbeing that can be shaped by the planning system, for example from transport and housing through to air quality and climate change, along with healthcare provision. It seeks an integrated and co-ordinated way to improving the mental and physical health of all Londoners. The London Plan promotes a Healthy Streets Approach to put improving health and reducing health inequalities at the heart of public space, which links with active travel.

Inclusive Design

25.4 An inclusive design approach is intended to ensure the diverse needs of all are integrated into proposals from the outset. This is essential to ensuring that the built environment, both the internal and external parts of buildings and the spaces in between, are safe, accessible, and convenient for all.

25.5 One of the draft priorities for the new Community Safety Strategy, being brought forward in 2023 by the Richmond Community Partnership, is for safer neighbourhoods: crime and anti-social behaviour including volume crime such as burglary and motor vehicle crime, violent crime such as robbery and knife crime – and keeping children and young people safe. The Council has committed to developing an ambitious, long-term strategic approach to ending violence against women and girls, in the Violence Against Women and Girls Strategy 2022- 25, and through planning for example inclusive design can ensure women feel visible and safe in public spaces. The borough has had the lowest crime rate in London for the last three years, although the layout of development and public realm,

encouraging active and continual use of spaces, can reduce opportunities for crime and anti-social behaviour and the fear of crime. Designing out crime is also identified in Policy 28 'Local Character and Design Quality (Strategic Policy)', in Policy 19 'Managing the Impacts of Development on Surroundings ' in considering ways to manage impacts of evening and food and drink uses, and Policy 43 'Floodlighting and Other External Artificial Lighting ' in recognising the benefits of floodlighting for safety of movement.

25.6 Public toilets are a vital facility, and should be provided as part of major development that are open to the public, such as shops, sport, leisure and health care facilities, transport hubs, cultural and civic buildings, and large areas of public realm. The supporting text to London Plan Policy S6 sets out that a range of toilet facilities should be provided, and that provision should be safe, well-lit and clean with ongoing management and cleaning secured at the planning stage. The provision of Changing Places toilets can open up new areas and experiences for people with profound and multiple impairments, and their companions, removing the barrier that the lack of provision can create.

25.7 The supporting text to London Plan Policy D8 also sets out that the provision of accessible free drinking water fountains helps improve public health, and reduces waste supporting the use of reusable water bottles.

Older People

25.8 Life expectancy has been increasing over time and there is a national trend towards an ageing population. There is a projected significant increase to 2039 in the over-75 population 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.

25.9 The Council is committed to creating a dementia-friendly community in the borough, as set out in the Richmond Joint Dementia Strategy, to support people with dementia and their carers. It is recommended that developers have consideration to the Royal Town Planning Institute (RTPI) practice guide 'Creating better environments for people living with dementia' (2020) which provides practical advice on how to incorporate dementia approaches in development proposals.

25.10 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.

25.11 Housing development should consider the needs of the older population. Opportunities to enable older people to downsize is recognised in Policy 13 'Housing Mix and Standards ', along with higher standards for inclusive access, and new accommodation should meet identified local needs as set out in Policy 12 'Housing Needs of Different Groups '.

Young People

25.12 What happens in early life, starting from conception, affects health and wellbeing in later life. However, it is often the environment that makes it difficult for children and young people to stay healthy. Growing up in a healthy and safe neighbourhood is a key part of giving children the best start in life; places where children can play safely and access green spaces, breathe clean air, be active, and enjoy a healthy diet. Prevention is critical to ensuring that children and young people can fulfil their potential.

25.13 Planning can play a role in addressing environmental harms and assets in the places and spaces where young people spend the most time outside of the home, including the school, and the local neighbourhood. This links with the approach to restricting the availability of unhealthy foods set out in this policy. It also links to the wider cross-cutting themes and the details set out in other policies in this Plan, for example there are opportunities to work with schools to

encourage modal shift to sustainable transport and encourage low pollution walking routes, to prioritise active travel and promote the Healthy Streets approach.

Health Impact Assessment

25.14 A Health Impact Assessment (HIA) must be submitted with all major applications. A HIA should assess the health impacts of ~~a~~ *proposed* development*s including consideration of existing health and wellbeing implications.*~~,~~ *It should* identify~~ing~~ mitigation measures for any potential negative impacts as well as measures for enhancing any potential positive impacts. ~~The London Healthy Urban Development Unit (HUDU) have developed a rapid HIA tool to quickly assess the impacts of a development plan or proposal and recommend measures, this tool should be used as early as possible in the planning process and established at pre-application stage.~~ *The HIA should be developed from RIBA Stage 1 to help influence concept and technical design as well as consider health and wellbeing inputs from community consultation processes such as workshops. The development of the HIA should demonstrate input from the lead architects and designers. The level of detail required for HIAs will be determined by the scale and impact of the development, HIA guidance is available online via the Council's website.* As set out in the Planning Obligations SPD, the *London Healthy Urban Development Unit (*HUDU*)* guidance and their Planning Contributions Model should be used to calculate the capital cost of the additional health facilities required to meet the increased demand which arises from new developments.

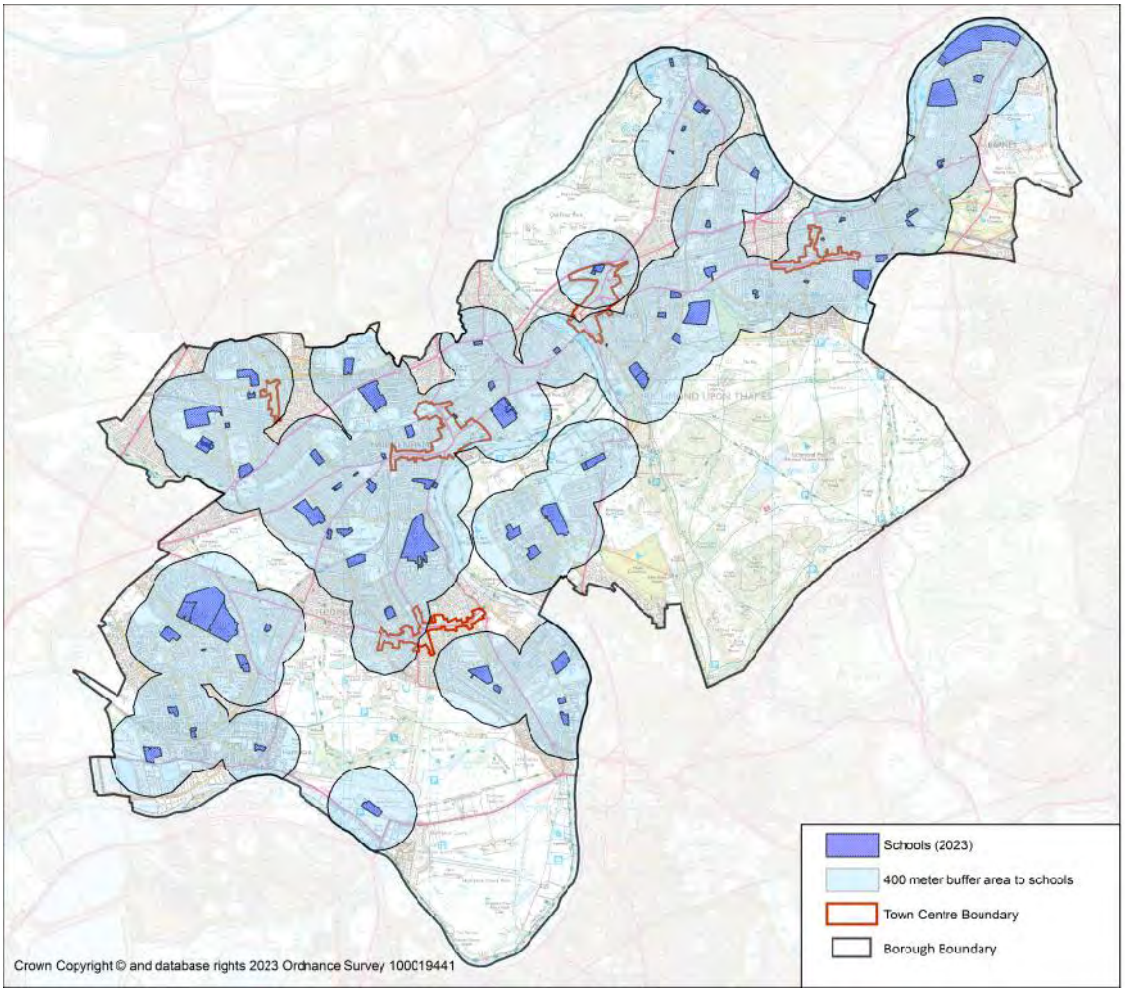
Takeaways

25.15 Planning can influence the built environment to support health and wellbeing, this includes helping to reduce obesity and excess weight in local communities. Obesity is one of the greatest health challenges facing London, and the creation of a healthy food environment is therefore important, as set out in the London Plan. 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 can influence the ability of individuals to adopt healthy lifestyles and have the potential to undermine healthy eating initiatives that may be in place at the school.

25.16 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.

25.17 The following map shows the existing schools within the borough (as of April 2023) and the associated 400 metre buffer area, which are the 'restriction' zones for fast food takeaways:

Map 25.1 Existing schools within the borough (as of April 2023) and the associated 400 metre buffer area



Health Infrastructure

25.18 The National Health Service (NHS) is facing unprecedented challenges and are working to better integrate health and social care. A key aspect of the approach is reviewing estate requirements so that they reflect new clinical and community based recovery and support approaches, changes arising from the COVID-19 pandemic and what may be needed in the future. This includes the challenge of optimising the redevelopment of health sites and other infrastructure to improve provision and, where appropriate, contribute more widely to the area health needs.

25.19 The South West London Integrated Care System is the partnership responsible for planning, commissioning and buying health services for the borough. They work closely with other providers including for mental health - Southwest London and St George's Mental Health NHS Trust, and for community services - Hounslow and Richmond Community Healthcare as well as NHS England in commissioning pharmacy services.

25.20 The NHS has moved to Integrated Care Systems, the ICS for South West London came into effect in July 2022. This is seeking to remove barriers that prevented an integrated system, to remove traditional divisions between hospitals and family doctors, between physical and mental health, and between NHS and council services. In the past, these divisions meant that too many people experienced disjointed care. It has established new partnerships between the organisations that meet health and care needs across an area, to coordinate services and to plan in a way that improves population health and reduces inequalities between different groups. It builds on the NHS Long Term Plan and continues to support the plan's

triple aim: Better Health for Everyone; Better Care for All Patients; and Sustainability of local and national NHS system. Place Leaders on behalf of the NHS work with partners such as the local authority and voluntary sector in an inclusive, transparent and collaborative way.

25.21 A Richmond Health and Care Estates Strategy has been prepared during 2021. Overall, this is to support new models of care and integrated working, developing flexible spaces and optimising use of the estate. With a broader model of health and social care working in a multidisciplinary way, there may be a future focus around health and social care community hubs to bring services to local areas. Flexible spaces could be used for social prescribing, including for community and voluntary groups, as a way that GPs, nurses and other primary care professionals can refer patients to local, non-clinical services to address health concerns and improve a patient's overall wellbeing, while reducing demands on primary (e.g. GPs) and secondary (e.g. hospital and community) care. Digitisation will also be key, and could bring efficiencies for example to access advice or for records storage, provided the digital infrastructure supports these ways of working in the health sector. The South West London Integrated Care System are also preparing an estates strategy.

25.22 There is pressure on health facilities in the borough with currently some shortfall in GP floorspace in parts of 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 49 Social and Community Infrastructure and paragraph 24.12 sets out that written agreement of the relevant health body must be provided to assess the loss of any existing health facilities.

25.23 While this Plan supports health and social care provision for meeting local needs, the flexibility introduced by Government through Use Class E (commercial, business and service uses) does in principle allow for changes of use both to and from other Class E uses and medical / health services, provided there are no restrictive conditions on a specific property. The policy approach to retaining existing health facilities and assessing new or improved health and social care facilities set out above will apply where planning permission is required for a change of use, or to extensions and new development. Where necessary and justified, the Council will use conditions and/or planning obligations to limit uses consented within Class E in order to achieve the objectives of this policy and in line with the NPPF and accompanying PPG to ensure provision of required health infrastructure to meet local needs.

Policy 52

Allotments and Food Growing Spaces

A. 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.

B. 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. In the highly unlikely event of allotments becoming 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.

25.24 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.

25.25 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. There are also two private sites in the borough. 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.

25.26 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.

25.27 The Borough's Open Space Assessment (2023) identifies a sufficient number of allotment plots within the borough due to some plots being split to create smaller, flexible and more manageable plots to meet the needs of a wider array of people. This approach, set out in the borough's Allotment strategy 2019-2029 and supported by the GLA and other organisations, results in 28.7 plots per 2,301 residents against a target of 20 plots per 2,301 residents.

25.28 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. This could include the innovative small-scale use of roofs, walls and balconies, especially where external space is limited.

Policy 53

Local Environmental Impacts

A. The Council will seek to ensure that local environmental impacts of all development proposals do not lead to detrimental effects 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, solar glare and solar dazzle as well as land contamination.

B. 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.

C. In accordance with London Plan Policy D13 Agent of Change, the Council will apply the Agent of Change principle, which places the responsibility for mitigating impacts from existing noise and

other nuisance-generating activities or uses firmly on the proposed new development sensitive to noise and other nuisances.

Air Quality

D. The Council promotes good air quality design and new technologies. All developments must comply with London Plan Policy SI 1 Improving Air Quality.

E. Major developments and large-scale development subject to an Environmental Impact Assessment (EIA) are required to achieve “Air Quality Positive”.

F. All developments must be at least “Air Quality Neutral”. Proposals that would materially increase exceedances of local air pollutants will be resisted unless the development mitigates this impact through physical measures and/or financial contributions to implement proposals in Richmond’s Local Air Quality Management Plan.

G. 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; this also applies to change of use to residential at street level;
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;
5. mitigation measures to reduce the impact of transport from the development upon air quality, including support for active travel, electric vehicles and car club membership.

H. The Council will require financial contributions towards off-site air quality measures where a proposed development is not air quality neutral, or mitigation measures do not reduce the impact upon poor air quality. Specific guidance for air quality in new developments is set out in the Council’s Air Quality SPD (2020).

Noise and Vibration

I. 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 manged;
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.

J. Specific guidance for where noise and/or vibration will be an important consideration is set out in Development Control for Noise Generating and Noise Sensitive Development SPD (2018).

Light Pollution

K. The Council will seek to 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

L. The Council will seek to 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

M. The Council promotes, where necessary, the remediation of contaminated land where development comes forward. Potential contamination risks will need to be properly considered and adequately mitigated before development proceeds. New development must not pose an unacceptable risk to water quality. Development which has the potential to adversely impact water quality will be required to provide appropriate mitigation to alleviate the risk.

Construction and demolition

N. 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 Plans (CMPs) 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.

O. Where applicable and considered necessary, the Council may seek a bespoke charge specific to the proposal to cover the cost of monitoring the Construction Management Plan (CMP). The Council will encourage early connection to electric power in the course of development to avoid nuisance from generators. In addition, CMPs will need to demonstrate how they meet the conditions and adhere to the Environment Agency's regulatory position statements on dewatering where applicable.

25.29 Development has an important role to ensure that the environment is respected and protected for future generations. Climate change is now the greatest challenge facing our society. The Local Plan places the environment at the centre of the Council's consideration of new development proposals.

25.30 Development should not contribute to, be at risk from or adversely affected by, unacceptable levels of air, noise, odour, light, soil and water pollution or land instability. Developers should explore ways to minimise any harmful and 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 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.

25.31 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.

25.32 The Agent of Change principle places the responsibility of mitigating the impact of nuisances (including noise) from existing nuisance-generating uses on proposed new development close by, thereby ensuring that residents and users of the new development are protected from nuisances, and existing uses are protected from nuisance complaints. Applications for new development likely to be impacted by existing noise or other nuisance-generating uses will require the submission of a relevant impact assessment to determine the impact and help inform the necessary mitigation measures to make the development acceptable. The Agent of Change principle works both ways; therefore, any new nuisance-generating development will need to put in place measures to mitigate noise impacts on existing development close by. Further information on the Agent of Change principle is included in the NPPF, PPG and London Plan, which set out how to mitigate the adverse impacts of noise as well as other such as air and light pollution.

Air Quality

25.33 Good air quality is vital to health and wellbeing. 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. 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. Strict mitigation will be required for any developments proposed within or adjacent to 'Air Quality Focus Areas'. An 'Air Quality Focus Area' is a location that has been identified as having high levels of pollution (i.e. exceeding the Government annual mean limit value for nitrogen dioxide) and human exposure. Air Quality Focus Areas are designated by the Greater London Authority. 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.

25.34 To tackle poor air quality, protect health and meet legal obligations, minor developments are required to be at least "Air Quality Neutral" or "Emissions Neutral". Major development proposals must be submitted with an Air Quality Assessment which will be enough to demonstrate that they are in accordance with Part B1 of London Plan Policy SI 1. However, where characteristics of the development or local features raise concerns about air quality, or where there are additional requirements for assessment in local policy, a full Air Quality Assessment may be required. Additional measures may also be needed to address local impacts. The Mayor's Air Quality Neutral LPG (2023) and Air Quality Positive LPG (2023) set out air quality benchmarks for all development, as well as a simplified approach for minor developments.

25.35 'Air Quality Positive' means making an active contribution to improving air quality in and around a development site or masterplan area and minimising exposure to existing sources of poor air quality. The key aim of the Air Quality Positive (AQP) Statement is to demonstrate how all aspects of a development – including the buildings, public spaces, landscaping and infrastructure – have responded to their environment, contributed to improvement and implemented best practice in relation to air quality. Compiling the statement should ideally be a continuous process throughout development design.

25.36 Although developers are expected to use appropriate mitigation measures to avoid adverse impacts, 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 sufficiently reduce the harm to air quality. Developers will be required to contribute to off-site measures by making a financial contribution to the Borough's Air Quality Action Fund (AQAF) secured through a Section 106 Agreement. Further details are set out in the Council's Air Quality SPD including the rates for calculating contributions and how funds will be spent.

25.37 The Council's Air Quality SPD (2020) as well as a Development Control for Noise Generating and Noise Sensitive Development SPD (2018), need to be followed.

25.38 The Council's Air Quality Action Plan 2020–2025 identifies actions and mitigating measures, to be implemented by the Council and partners, to reduce NO2 and PM10 borough wide from main emission sources including road transport and new developments.

Noise and Vibration

25.39 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. This therefore needs to be considered when new developments may create noise and vibration, and also when new developments would be sensitive to existing conditions.

25.40 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. The Council has adopted a SPD for Development Control 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.

25.41 The Agent of Change principle **places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development.** In other words, the person or business responsible for the change must also be responsible for managing the impact of the change. New development must be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). These existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

Light Pollution

25.42 Though a notable part of the urban environment, artificial lighting when poorly designed, positioned incorrectly or poorly controlled, can have a detrimental effect on receptors such as occupiers, residents, wildlife and ecological habitats, including rivers. 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

25.43 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.

25.44 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

25.45 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 occur 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. Where development comes forward potential contamination risks will need to be properly considered and adequately mitigated before development proceeds. Most of the borough is identified as being at risk of groundwater flooding, which can increase the risk of land contamination from development, and there are identified throughflow and groundwater policy zones. Development will be expected to minimise and mitigate this risk, in line with Policy 8 'Flood Risk and Sustainable Drainage (Strategic Policy) ' and Policy 9 'Water Resources and Infrastructure (Strategic Policy) ' of this Plan.

25.46 To deliver this the Council will:

1. require a desk top study and preliminary risk assessment, including an assessment of the site's history, potential contamination sources, pathways and receptors;
2. 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 interpretation of the results, and assessment of risks to groundwater;
3. where necessary, require a remediation strategy that sets out how any identified risks from the reports above are going to be addressed;
4. where necessary, require a validation report once remediation has taken place, including evidence that demonstrates that risks from contamination have been controlled effectively; and
5. require all above reports and investigations to be carried out by an aptly qualified person.

Construction and demolition

25.47 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.

25.48 The Council requires the submission of Construction Management Plans (CMP) 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. To manage the environmental impacts and ensure that the Construction Management Plans are adhered to, the Council will seek a charge to the applicant/developer to cover the cost of monitoring the CMP. Where an applicant/developer uses the Council's Building Control services, a discount may be applied to this charge.

25.49 The Council also requires developers to set out in a mitigation measures statement attached to the CMP how they will monitor dust, noise and vibration, and where necessary take the appropriate action if issues arise. 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. 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 at all times. The CMP needs to

address possible contamination of local surface water and groundwater bodies, and development proposals need to strictly adhere to the Environment Agency's regulatory position statements on dewatering; an environmental permit may be required by the Environment Agency in this regard.

Policy 54

Basements and Subterranean Developments

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. extend to no more than 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 to ensure the health and well-being of its occupants;
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 that the scheme will not increase or otherwise exacerbate flood risk on the site or beyond, in line with Policy 8 'Flood Risk and Sustainable Drainage (Strategic Policy) '; a site specific Screening Assessment, undertaken by a chartered professional, is required to assess likely impacts from subterranean development within throughflow and groundwater policy zones and/or in an area with >=25% susceptibility to groundwater flooding; if the Screening Assessment determines that the proposed subsurface development may have an impact on the local environment, or if it determines that further investigation work is required, then a Basement Impact Assessment is required;
6. where the proposal contains a waste outlet, install a suitable (positively) pumped device to protect the development from sewer flooding, in line withPolicy 8 'Flood Risk and Sustainable Drainage (Strategic Policy) ';
7. demonstrate as part of a Construction Management Plan that the development will be designed and constructed so as to minimise the impact during construction and occupation stages (in line with Policy 53 'Local Environmental Impacts');
8. demonstrate that the proposal does not cause loss, damage or adverse impact to biodiversity, including trees, and amenity value; and
9. externally visible elements such as light wells, roof lights and fire escapes need to be sensitively designed and sited to avoid any harmful visual impact on neighbouring properties or visual amenity.

C. Proposals for subterranean and basement developments, including extensions, as well as lightwells and railings, will be ~~assessed~~ *considered* against the advice set out in the Council's SPDs relating to character and design as well as the relevant Village Planning Guidance and the forthcoming SPD on Basements and Subterranean Developments. Applicants will be expected to follow the Council's Good Practice Guide on Basement Developments. Any sub-surface, basement and cellar proposals within throughflow and groundwater policy zones and/or in an area with >=25% susceptibility to groundwater flooding need to follow the guidance set out in the Council's Basement Assessment User Guide.

25.50 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. The Council has made two Article 4 Directions that came into effect on 1 April 2018, which remove permitted development rights across the whole borough for basement and subterranean developments.

25.51 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

25.52 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.

25.53 Adding basements to existing properties, particularly multiple basements in a residential street or area, can significantly change the character 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 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).

25.54 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.

25.55 In addition, this borough is characterised by low-rise residential areas that benefit from garden areas. Garden areas have multi-functional benefits by contributing significantly to the borough's green infrastructure network, providing biodiversity value and contributing to the special character and uniqueness of this borough, including the character of Conservation Areas and settings of heritage assets. They act as stepping-stone sites for wildlife and improve connectivity between habitats, help reduce flood risk and mitigate the effects of climate change including the heat island effect. They also provide green oases, tranquil areas and amenity space for residents as well as health benefits. 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 15 'Infill and Backland Development' resists the significant loss of 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 biodiversity to flourish, and 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.

25.56 To support appropriate planting and vegetation that supports biodiversity 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.

25.57 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, with further details set out in Policy 8 'Flood Risk and Sustainable Drainage (Strategic Policy) '. Issues of groundwater ingress to basement levels should be addressed by property owners. In areas at risk of flooding, Policy 8 'Flood Risk and Sustainable Drainage (Strategic Policy) ' will be applied, which restricts certain types of basements and uses in accordance with the relevant flood zones, for example, restricted uses include self-contained units and bedrooms at basement level. In addition, any sub-surface, basement and cellar proposals within throughflow and groundwater policy zones and/or in an area with >=25% susceptibility to groundwater flooding are required to carry out a site-specific Screen Assessment, which has to be undertaken by a chartered professional, to assess the likely impacts from subterranean development. It should address:

- the impacts of the proposed subsurface development on the area's subterranean characteristics;
- land stability; and
- flood risk and drainage.

25.58 If the Screening Assessment determines that the proposed subsurface development may have an impact on the local environment, or if it determines that further investigation work is required, then a Basement Impact Assessment is required, which has to be undertaken by a chartered professional. A Site and Assessment Verification Form has to be completed by the chartered professional who undertook the assessment and submitted as part of the application. The Council's Basement Assessment User Guide provides more information and guidance on Screening Assessments and Basement Impact Assessments.

25.59 Basements and subterranean developments can suffer inundation from flood water entering the basement from above. Policy 8 'Flood Risk and Sustainable Drainage (Strategic 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).

25.60 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 Plan (CMP), as set out in the Council's Local Validation Checklist, will be required for all types of basement and subterranean developments.

25.61 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. 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.

25.62 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. Proposals will also need to consider the potential archaeological impacts in Archaeological Priority Areas (APAs) where relevant. 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. In Conservation Areas, basements should conserve or enhance the character and appearance of the Conservation Area. This is particularly relevant in relation to external visible features such as light wells and railings, which may impact on the character of Conservation Areas.

25.63 The environmental impact of basement and subterranean developments is arguably greater than the equivalent above ground development due to the increased energy and resource requirements in their construction and use (e.g. heating and lighting). The Council therefore expects all basement development proposals to demonstrate that they have sought to minimise their environmental impact in accordance with the relevant climate change, sustainable construction standards and circular economy policies of this Plan.

25.64 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 and contractors of basements and subterranean developments are expected to sign up to a Considerate Construction Scheme. The Council strongly recommends for contractors undertaking basement construction to have membership of the Association of Specialist Underpinning Contractors (ASUC) or another suitable body. Applicants, and particularly contractors, should also follow the ASUC ‘Guidelines on safe and efficient basement construction directly below or near to existing structures’ (last updated in August 2016), which has been endorsed by the Health and Safety Executive.

25.65 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.

26 Implementation, Delivery and Monitoring

Policy 55

Delivery and Monitoring

Delivery

A. 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 Council will support various initiatives such as neighbourhood plans, town centre business improvement districts and other networks, which contribute to the aims of the Plan in order to promote our centres, attract investment and manage improvements to the public realm.

Infrastructure

B. We will work in partnership with key bodies that include TfL, the GLA and neighbouring boroughs to secure funding and ensure that transport infrastructure supports the needs of residents by prioritising active travel.
C. We will also work with other infrastructure providers such as utility companies to ensure that adequate infrastructure is in place to support future and existing residents.

Planning Obligations and Community Infrastructure Levy

D. The Council will continue to secure planning obligations through legal agreements (S106 Agreements) for the delivery of on-site affordable housing in line with Policy 11 'Affordable Housing (Strategic Policy) '.
E. The Council will also require planning obligations to mitigate any adverse impact from a development. In the first instance this mitigation should be on-site. If on-site mitigation is not feasible then a financial contribution will need to be secured towards appropriate off-site measures.
F. The Council will continue to secure funding from development through the borough Community Infrastructure Levy (CIL), and collect on behalf of the Mayoral CIL. The borough CIL will be used to fund local strategic infrastructure in the borough.

Enforcement

G. The Council will take enforcement action against unauthorised development where it is found to cause harm in accordance with the priorities and processes for enforcement action as set out in the Council's Planning Enforcement Policy. Such action is discretionary and the Council will seek to exercise these powers in a manner that is proportionate to the severity of a breach.

Monitoring

H. We will continue throughout the Plan period to assess how our planning policies are working and making sure the outcomes are improving our local area.

26.1 As important as setting out the vision, objectives, place-based strategies, policies and Site Allocations in the Plan is the framework for implementation. A critical part is the delivery of infrastructure, to support sustainable growth, and how contributions from development will be secured through planning obligations and financial contributions. It is vital this is based on an understanding of viability and deliverability, with a realistic plan for what can be achieved by infrastructure providers, service delivery organisations, strategic bodies, developers and landowners, given the limitations of the Council's role. This section also covers how the Council can take enforcement action against unauthorised development, and undertakes regular monitoring to ensure the plan is effective and where interventions may be needed to achieve the objectives of the Plan.

Implementation of the Local Plan

26.2 The new Local Plan sets out the strategy and vision of how the borough will accommodate growth which provides enough homes, jobs, school places and health facilities for existing and new residents. Over the course of this plan the Council will be expected to deliver 4110 new homes. This will put pressure on existing infrastructure such as water waste, energy and transport.

26.3 The Local Plan will be implemented and delivered through a combination of private sector investment, the work of other agencies and bodies, and the Councils own strategies and initiatives. The majority of new development identified in the Plan's site allocations, particularly investment in new infrastructure, housing and jobs, will be delivered by the private sector. Physical,

social and green infrastructure is provided and managed by a wide range of organisations in Richmond. This includes Transport for London, Network Rail, statutory undertakers such as Thames Water and other parts of the public sector such as the NHS and their various trusts and educational providers. The community and voluntary sector will play a key role in implementation. The Council will engage with all of the partner organisations throughout the plan period to make sure that delivery of infrastructure is provided at the right time and in the right place.

26.4 The emphasis in this Plan is on the 'Living Locally' concept which requires the provision of infrastructure to create and support 20-minute neighbourhoods. This cuts across all the ten themes and the Plan as a whole, in terms of the locations of homes, places to work and for leisure, and improvements such as towards active travel and green infrastructure. All new development will deliver improvements to support the living locally concept.

26.5 Through **responding to the climate emergency and taking action**, infrastructure will be adapted to become more climate resilient to cope with drought and flooding, along with investment to build a low carbon society, particularly for energy, waste and water. There will be increasing use of low and zero carbon heat sources and decarbonisation of existing heat networks. There will be more efficient use of water resources and supply, and an improvement in water quality in the borough's rivers. There will be use of materials, and provision for storage and collection which minimise waste and enable a circular economy. Buildings and infrastructure will enable residents, businesses and visitors in the borough to contribute to achieving a net-zero carbon borough by 2043.

26.6 At least 4,110 homes will need to be built in the borough over the next 10 years, as envisaged through **delivering new homes and an affordable borough for all.** 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. The Plan emphasises the need for genuinely affordable housing due to the acute affordable housing crisis. 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.

26.7 The spatial strategy highlights that by 2039 there is an under-supply of 6,200 sqm gross of retail and food/beverage floorspace requirements. As set out in **Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic**, the focus will be on the repurposing of retail space to enable our centres to diversify their offer and facilitate adaption to meet changing needs. Repurposing floorspace will be delivered by the private sector through changes of use and mixed use redevelopment schemes within the borough's centres and Site Allocations as identified in this Plan. In particular, Richmond Station and Kew Retail Park are major redevelopment opportunities.

26.8 A key focus is on place-making in our town and local centres, so that by **improving design, delivering beautiful buildings and high-quality places** they will be destinations with places to meet, shop, work and for leisure, acting as hubs and supporting Living Locally. While development from the private sector is expected to follow a design- and character-led approach, funding for public realm improvements can come from the Council, GLA and central Government, as well as through Business Improvement Districts (BIDs) and local schemes. There will be a partnership approach within the Council, such as licensing, working with business associations, and with other agencies such as the Police, to manage impacts and take a holistic approach. All development across the borough will take account of design codes and the Urban Design Study, to recognise the unique and distinctive character and delivers high-quality design.

26.9 The emphasis on **increasing jobs and helping business to grow and bounceback following the pandemic** is on providing a variety of affordable and adaptable workspaces, supporting the borough's locally important sectors and enterprise. The provision of employment space will be delivered by the private sector, this is expected through employment-led intensification and new commercial uses in locations identified in the spatial strategy and employment policies of this Plan. Provision of affordable workspace and support for local employment opportunities and training programmes will be secured through planning obligations in appropriate schemes. Good telecommunications connectivity will be provided, including broadband connections and mobile connectivity, particularly to enable smart technologies and data to support economic growth.

26.10 With the emphasis on **reducing the need to travel and improving the choices for more sustainable travel**, improvements to transport infrastructure particularly for walking, cycling and public transport will be essential to delivery of the Plan. All development will follow the Healthy Streets approach so the design and management of streets will support activities in the public realm and facilitate a shift to active travel, which also encourages improvements in air quality and promotes healthy lifestyles. The Council will support active travel projects and improvements to public transport, including improving interchange and accessibility. Improvements are largely 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 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. There are aspirations for a new foot and cycle bridge across the River Thames and opportunities to support new technology such as the establishment of e-mobility services.

26.11 Through **protecting what is special and improving our areas (heritage and culture)** the importance of heritage assets will be realised. The repair, restoration or maintenance of a heritage asset will be captured in a planning obligation where relevant to development, as well as opportunities to increase public access. Enhancements to the cultural and community offer will be provided by trusts, interest and faith groups, and commercial enterprises, to support the cultural quarters in Richmond and Twickenham and clusters across the borough.

26.12 There will be enhancements to the multi-functional networks through **increasing biodiversity and the quality of our green and blue spaces, and greening the borough**. The emphasis in the Plan is on the benefits for health and well-being, climate change, and connecting with nature. Contributions to open spaces, play and sport facilities, enhancing biodiversity and increasing tree canopy will be secured as part of new development. Major new development will provide on-site green spaces.

26.13 As set out in **Securing new social and community infrastructure to support a growing population**, 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. There is an emphasis on flexible spaces that can adapt to change, particularly to serve "Living Locally". New community and social infrastructure facilities are also expected to be delivered on a variety of sites as identified in this Plan. School place planning is complex, not least as national freedoms and flexibilities enable different providers to come into the market through the free school route. A key challenge will be to ensure provision of sufficient state-funded school places, as 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 land for new educational use at Stag Brewery and Barnes Hospital.

26.14 **Creating safe, healthy and inclusive communities** will also be integral across a range of infrastructure, and ensuring places will genuinely cater for all needs. The activities of other key partner agencies and bodies, such as the South West London Integrated Care System and NHS partner organisations, who are responsible for delivering health services in the borough. There is continuing estate optimisation, with shortfalls in GP floorspace in parts of the borough, and there will be new models for integrating health and care needs, with flexible spaces and community hubs to bring services to local areas. There are pockets of relative disadvantage around Castelnau, Ham, Hampton Nursery Lands, Heathfield, Mortlake and Whitton. The community and voluntary sector will also be a key partner to deliver services and facilities to meet people's needs.

26.15 Further information including a detailed list of projects and infrastructure requirements to support development is set out in the Council's Infrastructure Delivery Plan and Infrastructure Delivery Schedule.

Infrastructure Delivery

26.16 The Infrastructure Delivery Plan (IDP), updated in 2023, is part of the evidence base that has informed the policies contained within this 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'. The IDP provides an infrastructure assessment, identifying future infrastructure and service needs for the borough, specifically by:

- providing an analysis of existing infrastructure provision and identifying how well existing needs are met;
- identifying future infrastructure requirements to support new development and a growing and changing population, housing and employment growth;
- providing an indication of the potential costs and means and sources of funding the required infrastructure, including public funding, developer contributions and other sources; and
- providing a justification for the continued operation of the borough Community Infrastructure Levy (CIL) (introduced in November 2014).

26.17 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.

26.18 The IDP therefore ensures that all infrastructure matters necessary for the achievement of the Local Plan Vision and Spatial Strategy as well as the place-based strategies, policies and site-specific proposals are embraced. *All new infrastructure should be to high design and sustainability standards, as set out in other policies in the*

Plan, for example taking into account existing site constraints including utilities situated within sites, and seeking a creative approach to new development around utilities assets.

26.19 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. 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.

26.20 Both the IDP and IDS provide a snapshot 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 at www.richmond.gov.uk/local_plan, which is also where future updated editions of the IDP and IDS will be published.

Planning Obligations and Financial Contributions

26.21 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, that would not otherwise be acceptable. For planning obligations to be acceptable they must meet three tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) which are:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

26.22 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, the Air Quality SPD, Transport SPD, and any relevant forthcoming SPDs, along with the Borough and Mayoral Community Infrastructure Levy. Further details on these documents can be found on the Council's website at www.richmond.gov.uk/planning_policy

26.23 The Community Infrastructure Levy (CIL) is a charge which is levied by the Council on new developments in the borough to fund infrastructure. Not all developments are liable to pay CIL and the borough Community Infrastructure Levy Charging Schedule sets out the rates and boundaries which apply in accordance with the CIL regulations. The current charging zones include a higher residential rate in the north of the borough and a lower rate to the south. A portion of the borough CIL collected is spent on local priorities, this neighbourhood element is operated through the Community Fund. An Infrastructure Funding Statement (IFS) is published each year setting out the income and expenditure relating to the community infrastructure levy (CIL) and section 106 (S106) agreements. The Council will also continue collecting Mayoral CIL which is used by the Mayor and the GLA to fund strategic projects that impact the whole of London, for example Crossrail.

Enforcement

26.24 The planning system is undermined when unauthorised development is allowed to go unchecked. Unauthorised development can have a negative impact on the borough's residents, heritage assets and local areas. The Council will take proactive measure where it has been identified that an unauthorised development causes harm and will take appropriate enforcement action in accordance with the Council's Planning Enforcement Policy, subject to resources available.

Monitoring the Local Plan

26.25 The Council has a well-established and up-to-date monitoring system in place for a range of indicators and targets which monitor the effectiveness of the polices and strategies over time, set out in the Local Plan Monitoring Framework. Key aspects of monitoring continue to be undertaken on an annual basis and is reported as part of the series of Authority's Monitoring Reports. The GLA also publish monitoring information on the Planning London Datahub which includes interactive tools on development proposals to enable up to date assessment of all planning applications. In addition, the Sustainability Appraisal process, along with other monitoring and research, are used to inform monitoring. The monitoring framework will be revised to reflect the adoption of the new Local Plan policies.

26.26 It is recognised that over the lifetime of the Plan, external circumstances will change. As set out in Policy 10 'New Housing (Strategic Policy) ', the Government annually measures housing delivery and if future delivery falls below certain thresholds then action may be required. Whilst the Plan is overall considered to be flexible, the NPPF allows for Local Plans to be reviewed in whole or in part to respond flexibly to changing circumstances. Therefore, external factors such as changes in national policy, a London Plan review or changes in local evidence and need may trigger a review of this Local Plan. Future reviews may be through a new system of plan-making as proposed by Government through the Levelling-up and Regeneration Bill which may be implemented from late 2024. The programme for the preparation of Development Plan Documents is set out within the Council's Local Development Scheme, which is regularly reviewed and updated.

27 Glossary

Accurate Visual Representations (AVR) – A still image, or animated sequence of images, intended to convey reliable visual information about a proposed development to assist the process of visual assessment.

Active (Building) Frontages – Frontages at ground floor that contain entrance doors and windows, which allow interaction between the public realm and the premises facing the street, adding interest and vitality to the street environment.

Active Travel – All modes of transport that involve physical exertion and can benefit individual health, primarily through walking and cycling.

Active Travel Strategy 2020 - The Richmond Active Travel Strategy aims for more trips to be undertaken to, from and within the Borough by walking and cycling, as both standalone trips and as part of longer trips involving public transport. It replaced the Richmond Cycling Strategy.

Affordable Housing – Social rented and affordable rented housing, as well as intermediate housing when delivered in compliance with the Council's Intermediate Housing Policy Statement 2019 or any further update, 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 must include provisions to remain at an affordable price in perpetuity for future eligible households or in special circumstances for the subsidy to be recycled for alternative affordable housing provision. Policy 11 sets out the types of housing that the Council considers to be genuinely affordable housing, in the context of the Local Plan. The NPPF sets the definition of affordable housing in Appendix 2.

Agent of change principle - The principle places the responsibility of mitigating the impact of nuisances (including noise) from existing nuisance generating uses on proposed new development close by, thereby ensuring that residents and users of the new development are protected from nuisances, and existing uses are protected from nuisance complaints. Similarly, any new nuisance-generating development, for example a music venue, will need to put in place measures to mitigate noise impacts on existing development close by.

Archaeological Priority Area (APA) – APAs are defined areas where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries.

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).

As originally constructed – This refers to the floor area of the property prior to any extensions being carried out. Extensions carried out pre-1948 can be included in the original floor area. Parts of the dwelling that were not originally habitable rooms (for example lofts and cellars) would not be included for the purposes of calculating original floor area.

Association for Environment Conscious Building (AECB) - AECB is a membership network with the aim of promoting green, low energy, sustainable building. The AECB Building Standard was previously known as Silver Standard.

Authority Monitoring Report (AMR) – The AMR reports on the performance of the Council's planning policies as set out in the Local Plan. The requirement for the Local Authority to produce an AMR is set out in Section 113 of the Localism Act 2011.

(BEIS) Department for Business, Energy and Industrial Strategy – Government department leading economy-wide transformation by backing enterprise and long-term growth, generating cheaper, cleaner, homegrown energy and unleashing the UK as a science superpower through innovation.

Biodiversity or biological diversity – 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.

Biodiversity Net Gain (BNG) - Biodiversity net gain (BNG) is an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures.

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.

BREEAM (Building Research Establishment Environmental Assessment Method) – BREEAM is a sustainability assessment and certification scheme for the built environment and provides a widely recognised and well understood framework for the promotion of sustainable design. It allows for the assessment and rating of the environmental life cycle impacts arising from different types of developments, including energy, pollution, water, materials, health and wellbeing, and waste. Compliance with BREEAM will help to mitigate the life cycle impacts of new and existing buildings on the environment and allow developers to demonstrate to the Council that development is truly sustainable.

Building of Townscape Merit (BTM) – BTMs 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.

Building Regulations (Part L) - Part L (conservation and fuel power) of the Building Regulations in England sets the limiting values for all building fabrics, the conservation of fuel and energy. The Government has said that the Future Homes Standard, anticipated to come into force in 2025, will deliver zero-carbon homes. Part F (ventilation) applies to the ventilation requirements and standard required within buildings. Part O (overheating) requires the calculation and minimisation of overheating within commercial and residential buildings. Often known as TM52 and TM59 overheating analysis requires detailed dynamic simulation thermal modelling (DSM).

Business Improvement Districts (BIDs) – A 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.

Canyon like effect – Created when a narrow street is flanked by continuous tall buildings on both sides.

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 realistically reflect the contribution of the tree to public welfare through tangible and intangible benefits. For further information see the London Tree Officers Association website at www.ltoa.org.uk/resources/cavat

Car Club – These are schemes such as city car clubs and carpools, which facilitate vehicle sharing.

Carbon - The word carbon is used in this Plan as shorthand for all greenhouse gases. London's carbon accounting is measured in carbon dioxide equivalent, which includes the conversion of other greenhouse gases into their equivalent carbon dioxide emissions.

Carbon Neutral - The definition of a carbon neutral building is a building where greenhouse gas emissions are minimised at all stages, including the manufacturing processes, during construction and during use of the building. The emissions that occur are balanced by climate-positive initiatives and offsetting so that the net carbon footprint over time is zero, making or resulting in no net release of carbon dioxide into the atmosphere.

Centre Hierarchy – The hierarchy of centres in the borough categorises centres and parades into 4 types – town centres, local centres, neighbourhood centres and Important Local Parades. They range significantly in size and function. Paragraph 86 *of the September 2023 NPPF / Paragraph 90* of the *December 2023* NPPF requires local planning authorities to define such a hierarchy.

Character – The distinctive or typical quality of a building or area; as described by historic fabric; appearance; townscape; and land uses.

Climate Emergency Strategy – A high level strategy intended to provide an overarching framework around climate change, bringing together existing areas of work to provide more clarity and focus, to highlight linkages between approaches being taken across the organisation and to identify additional key future actions and approaches which have not previously been in place.

Combined Heat and Power (also see **Decentralised Energy**) – Involves the production of usable heat and power (electricity), in one single, efficient process. This contrasts with conventional ways of generating electricity where the heat created is wasted.

Collaborative / co-design – Groups and interests come together to develop a process that responds to individual or collective needs and aspirations.

Commercial uses / Floorspace – Uses / floorspace that supports any employment-generating activity, including shops, financial and professional services, cafes, restaurants, pubs or drinking establishments, take aways, office, research and development facilities, light industry, general industry, storage or distribution uses, gymnasiums, indoor recreational facilities, clinics, health centres, creches, nurseries, day centres, schools, non-residential education and training centres, museums, public libraries, public halls, exhibition halls, law courts, cinemas, concert, bingo and dance halls.

Community Infrastructure Levy (CIL) – Levies on development to fund the infrastructure necessary to support the development set out in the Council's Local Plan(s) and Crossrail. Also known as Developer Contributions.

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 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.

Controlled Parking Zone (CPZ) - A Controlled Parking Zone is an area which requires you to have a permit to park in the parking bays or is restricted by a single or double yellow line. The main aim is to discourage commuters and long stay parking by people from outside the area.

Conventional homes – houses and flats (including affordable housing). It excludes non-self-contained accommodation, and non-conventional homes such as student accommodation hostels.

Cultural Quarter - Areas where a critical mass of cultural activities and related uses, usually in historic or interesting environments, are designated as Cultural Quarters.

Culture Richmond 2021 to 2031 – A 10-year strategy setting out how our arts, library, parks and sport & fitness services will enrich the lives of those who live in, work in and visit our borough. The strategy's aim is that by 2031 Richmond has an innovative, diverse and accessible cultural offer which seeks to empower, enable and inspire and contributes to the growth and success of our borough, communities and people.

Decentralised Energy (also see **Combined Heat and Power**) – Decentralised energy include low- and zero-carbon power and/or heat generated and delivered within London. This includes microgeneration, such as photovoltaics on individual buildings, through to large-scale heat networks.

Designated Heritage Asset – 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.

Design code - A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.

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.

District Heating / Cooling Networks – The supply of heat (and/or cooling) from an Energy Centre (or multiple centres) to a number of buildings through a network of pre-insulated underground pipes.

Dual Aspect – A dual aspect dwelling is one with opening windows on two external walls, which may be on opposite sides of the building or on adjacent sides of a dwelling where the external walls of a dwelling wrap around the corner of a building. One aspect may be towards an external access deck or courtyard, although the layout of the dwelling needs to be carefully considered in these cases to maintain privacy. The design of the dual aspect dwelling should enable passive/natural ventilation across the whole dwelling. The provision of bay windows, stepped frontage, shallow recesses, or projecting facades does not constitute dual aspect.

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).

Energy Use Intensity - is a measure of the total energy consumed in a building annually. It includes both regulated (fixed systems for lighting, heating, hot water, air conditioning and mechanical ventilation) and unregulated (cooking and all electrical appliances, and other small power) energy. It does not include energy use from electric vehicle charging or any reduction in EUI due to renewable energy generation on-site.

Environment Agency (EA) – A UK government agency concerned mainly with rivers, flooding, and pollution and providing public information.

Environmental Impact Assessment (EIA) – A procedure to be followed for certain types of projects 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 2017 (as amended).

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.

Fabric Energy Efficiency Standard (FEES) – This standard sets a maximum limit on the amount of energy (in kWh/m2/year) that would normally be needed to maintain comfortable internal temperatures in a home. It was first introduced as part of a strategy for zero carbon homes, in 2016. It is included in the Code for Sustainable Homes, a method for assessing and certifying the sustainable design and construction of new homes.

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.

Flood Risk Assessment (FRA) – In circumstances where the Environment Agency consider there is a risk of flooding, they may require a Flood Risk Assessment to accompany a planning application.

General Permitted Development Order (GPDO) – The Town and Country Planning (General Permitted Development) Order 2015 (as amended) grants rights (known as permitted development rights) to carry out certain limited forms of development without the need to make an application for planning permission.

Greater London Authority (GLA) – The Greater London Authority is a strategic city-wide government for London made up of a directly elected Mayor - the Mayor of London - and a separately elected Assembly - the London Assembly.

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 corridor - Relatively continuous areas of open space leading through the built environment, often consisting of rivers, railway embankments and cuttings, roadside verges, canals, parks, playing fields and extensive areas of private gardens. They allow movement of species between areas. Routes providing walking, cycling or horse riding, whether for leisure purposes or travel may also offer opportunities for wildlife mitigation.

Green and Blue Infrastructure – Comprises the network of parks, rivers, water spaces and green spaces, as well as the green features of the built environment, such as street trees, green roofs and sustainable drainage systems, all of which provide a wide range of benefits and services.

Greenspace Information for Greater London (GiGL) – GiGL is the environmental record centre for Greater London. It collates information about wildlife, parks, nature reserves, gardens and other open spaces. The data helps inform the Council's policies regarding biodiversity and open space.

Green roofs/walls – Planting on roofs or walls to provide climate change, amenity, food growing and recreational benefits.

Gross internal area (GIA) – This is the internal area of the dwelling measured to the internal face of the dwelling's perimeter walls.

Gypsies and Travellers – Persons of nomadic habit of life whatever their race or origin, excluding members of an organised group of travelling show-people or circus people travelling together as such.

Habitable floorspace – All floorspace used for living purposes with a floor to ceiling height of 1.5m or over within a habitable room. Floorspace within habitable rooms with a floor to ceiling height of between 0.9m and 1.5m is counted as 50 per cent of its floor area and any floor area with a floor to ceiling height lower than 0.9m is not counted as habitable floorspace.

Habitable Rooms – Includes all separate living rooms, bedrooms, and kitchens with a floor area of 13sqm or more.

Ham and Petersham Neighbourhood Plan 2018 – 2033 – A neighbourhood plan developed by the Ham and Petersham Neighbourhood Forum. See Neighbourhood (Development) Plan below.

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.'

Healthy Streets approach – Healthy Streets is a human-centred framework for embedding public health in transport, public realm and planning. Measures include improving air quality, safety, and opportunities to walk, cycle and use public transport.

Health Impact Assessment (HIA) – A combination of procedures, methods and tools by which a policy, program or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population.

Heritage Asset – A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets (as defined in the NPPF) and assets identified by the local planning authority during the process of decision-making or through the plan-making process (including local listing).

Heritage Conservation – The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

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. Those elements of the historic environment that hold significance are called heritage assets.

Housing and Homelessness Strategy 2021-26 – The Housing and Homelessness Strategy sets out the Borough's plans for housing and homelessness services for 2021 – 2026. The previous Strategy covered 2018 – 2023; this has been refreshed now to ensure that the Council's housing objectives reflect current challenges and respond to significant developments in the sector including new legislation. The Strategy focuses on four key themes, each of which play an integral part in providing good quality, affordable housing:

- Delivering affordable homes; new supply and redevelopment of existing social housing stock;
- Addressing housing market pressures, preventing homelessness and increasing housing options: Homelessness and Rough Sleeping Strategy 2021-2026;
- Ensuring good quality homes; providing choice, standards and quality for renters;
- Supporting the needs of residents, working with care and support services to provide quality housing options.

Housing Delivery Test (HDT) – The HDT is an annual measurement of housing delivery in the area of relevant plan-making authorities. It is a percentage measurement of the number of net homes delivered against the number of homes required. The HDT is referred to in the NPPF. It uses national statistics and local authority data. The Secretary of State publishes the HDT results for each local authority in England every November.

Housing in Multiple Occupation (HMO) – Dwellings which are shared by three or more tenants who form two or more households and share a kitchen, bathroom or toilet. HMOs for between three and six people are classed as C4 whereas HMOs for more than six people are Sui Generis.

International Council on Monuments and Sites (ICOMOS) – A non-governmental international organisation dedicated to the conservation of the world's monuments and sites.

Inclusive design – Design that creates an environment where everyone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers that create undue effort, separation or special treatment, and enables everyone regardless of disability, age, or gender to participate equally, confidently and independently in mainstream activities with choice and dignity.

Industrial land and business parks – Industrial land and business parks are identified in this Plan (see Policy LP 24) 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 B2 or B8 Use Classes or are Sui Generis (such as vehicle repair garages, scrap yards, petrol filling stations, builders' merchants).

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.

Infrastructure Funding Statement (IFS) – A report detailing revenue from CIL and Section 106 contributions and the infrastructure projects to be funded wholly or in part by this income.

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.

Key worker housing – for workers providing an essential service that is also local to their place of employment. Defined by the Mayor's core list of key workers, classified by occupation, in the Housing Policy Practice Note 'Allocating Intermediate Homes to London's key workers' (2021).

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'.

Living Locally – A concept that underpins the entire Plan and incorporates the 20-minute neighbourhood concept. It seeks to increase convenience for residents by providing essential needs and services within an 800-metre catchment around the different centres. This will coincide with more opportunities to walk, cycle, and use public transport over car use.

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 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. They are defined on the Policies Map by a centre boundary.

Local Green Space (LGS) – Local communities can identify green or open space which is of special quality and holds particular significance and value to the local community which it serves, in line with paragraphs 101 to 102 of the *September 2023 NPPF / paragraphs 105 to 106* of the National Planning Policy Framework (NPPF). Local Green Spaces can only be designated when a local plan or neighbourhood plan is prepared or reviewed. National policy on Green Belt applies to any designated Local Green Space.

Local Housing Need Assessment (LHNA) – The report provides evidence to inform the context for the borough's housing requirement; determines the need for affordable housing specialist forms of housing including for older persons; and informs housing policies in the Local Plan.

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.

Local Plan – A Local Development Document which includes policies encouraging development, allocating sites or including development management policies as set out in Regulation 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Important Local Parades – 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, Waldegrave Road, Whitton Road. These centres are important for meeting mainly local but valued needs for communities. They are defined on the Policies Map by a boundary.

London Development Database – This provides current and historic information about development progress across all London boroughs. It is operated by the GLA.

London Plan – The plan is a spatial development strategy for the Greater London area, to deal with matters of strategic importance to the area. The current London Plan was published by the GLA in 2021.

London Plan Guidance (LPG) – produced by the GLA, provides further information about how the current London Plan should be implemented. Guidance documents can be found online. There is no power for the Mayor to produce SPDs, so guidance is prepared under the Mayor's general powers. For previous London Plans SPGs were prepared, and sixteen SPGs were 'saved' when the London Plan was published in March 2021. Over time the LPG will update and replace the remaining SPG documents.

Low-carbon Energy - Low carbon means less carbon dioxide. It is essentially energy that is produced with substantially lower greenhouse gas emissions than conventional fossil fuel power generation. There are four main types of low-carbon energy: wind, solar, hydro and nuclear power.

Marine Management Organisation (MMO) – The MMO is a delivery body that works closely with DEFRA to manage and regulate England's seas and coasts, to ensure balance between increased economic development and the protection and enhancement of the marine environment.

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.

Mid-rise Building - Buildings which do not trigger the definition of a tall building, but are 5 storeys or over, or 15 metres or more from the ground level to the top of the building (whichever is lower).

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 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. The current edition of the NPPF was published in ~~July 2021~~ *December 2023*, *although in line with transitional arrangement this Plan has been examined against the September 2023 version,* and *further* updates ~~have recently~~ *may* be~~en~~ subject to consultation by the Department for Levelling Up, Housing, and 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), Twickenham Green, 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. They are defined on the Policies Map by a centre boundary.

Neighbourhood (Development) Plan – A community-produced document that sits alongside the Council's Local Plan for the area, which provides policies and guidance at both a borough-wide and a neighbourhood scale.

Offices – A building or premises that previous fell within the B1(a) Use Class Order. Since 1 August 2021, office uses are now included in the new E Use Class Order.

Open Space – 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.

Other Open Land of Townscape Importance (OOLTI) – 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. OOLTI is a local policy and new designations are made by the Council as part of the plan-making process. This is different to 'Local Green Space' (see definition above), which national policy makes provision for.

Passivhaus - a leading international design standard, delivering high standards of comfort and health and slashing energy use from buildings.

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. May form part of Developer Contributions.

Planning Performance Agreement (PPA) – A PPA is a project management tool which local planning authorities and applicants can use to agree timescales, actions and resources for handling particular applications. It should cover the pre-application and application stages but may also extend through to the post-application stage. PPAs can be particularly useful in setting out an efficient and transparent process for determining large and/or complex planning applications. They encourage joint

working between the applicant and local planning authority, and can help to bring together other parties such as statutory consultees. A PPA is agreed voluntarily between the applicant and the local planning authority prior to the application being submitted, and can be a useful focus of pre-application discussions about the issues that will need to be addressed.

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.

Playing Pitch and Outdoor Sport Strategy 2023 – the Strategy builds upon the preceding Playing Pitch and Outdoor Sport Assessment Report. It provides a clear, strategic framework for the maintenance and improvement of existing outdoor sports facilities and accompanying ancillary provision.

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. Also known as Brownfield Site.

Private Rented Sector (PRS) – a classification of housing in the UK, whereby property owned by a landlord is leased to a tenant. A landlord could be an individual, a property company or an institutional investor. Tenants either deal directly with an individual landlord, or alternatively with a management company or estate agency caring for the property on behalf of the landlord.

Primary shopping areas - Defined area in the five town centres where retail development is concentrated.

Policies 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 access~~ibility of buildings and uses by~~ *to the* public transport *network*. *For each point walk time to the public transport network is combined with service wait time (frequency) to give a measure of public transport network density. This provides an overall access index which can be allocated to nine access levels between 0 and 6b.* The higher the PTAL score ~~(between zero to six)~~, the better the access~~ibility~~. *TfL has made pre-calculated PTALs available on WebCAT, its web-based connectivity assessment toolkit (www.tfl.gov.uk/WebCAT).*

Purpose-Built Student Accommodation (PBSA) – A specialised form of housing built for students to live in, generally taking the form of either 'cluster' flats, which have multiple private ensuite bedrooms and shared kitchen/living areas, or private studio flats. See Policy H15 of the London Plan.

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 are regulated by the Regulator of Social Housing.

Renewable Energy – This refers to energy collected from renewable resources that are naturally and constantly replenished. It includes sources like sunlight, wind, rain, tides, waves, and geothermal heat. Although most renewable energy is sustainable energy, some is not, for example some biomass is unsustainable.

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. The plan was most recently published in 2019.

Richmond Design Review Panel (RDRP) – The RDRP was set up in 2018. It is an independent body comprising of architects, urban designers, landscape architects, engineers, transport planners, heritage experts and other design-related professionals with a local interest and recognised expertise in their field. The panel assesses development schemes within the borough, ideally at pre-application and an early stage in the design and planning process, and occasionally post-application schemes with a view to raising the architectural quality of proposals.

Section 106 Agreement (S106) – Refers to Section 106 (S106) of the Town and Country Planning Act 1990 allows a local planning authority to enter into a legally-binding agreement or planning obligation with a landowner in association with the granting of planning permission. The obligation is termed a Section 106 Agreement.

Secured by Design – The official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop and visit.

Short Term Lettings – These can also include holiday lets and require specific planning consent under the Greater London Council (General Powers) Acts 1973 and 1983.

Site of Importance for Nature Conservation (SINC) – Sites of Importance for Nature Conservation (also known as Local Sites outside of London) are non-statutory wildlife sites designated at a local or regional level for their importance for conservation. In London there are three tiers of such sites: Sites of Metropolitan Importance: these are the best examples of wildlife sites in London and are selected by the Mayor of London and his officers at the Greater London Authority. Sites of Borough Importance: selected at a borough level these are important wildlife sites for the Borough. These are graded into Borough grade 1 or grade 2 Sites of Local Importance: selected at a borough level these sites ensure that everyone has easy access to nature close to home.

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.

Social infrastructure – Covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.

Special Area of Conservation (SAC) – Areas designated to protect the species listed in annex I and II of the European Union's Habitats Directive (92/43/EEC) which are considered to be of European interest following criteria given in the directive.

Special Protection Areas (SPA) - Special Protection Areas (SPAs) are designated under the European Commission Directive on the Conservation of Wild Birds (1979). Under this directive, the UK Government must designate SPAs to conserve the habitat of certain rare or vulnerable birds (listed in the directive)

and regularly occurring migratory birds. There is a requirement to protect SPAs from any pollution, disturbance or deterioration. The UK exit from the European Union does not alter the protection of these sites.

Strategic Environmental Assessment (SEA) – An assessment of the effects of certain plans and programmes on the environment, known as the Strategic Environmental Assessment or SEA Directive, required by the European Directive 2001/42/EC.

Strategic Flood Risk Assessment (SFRA) – An assessment of flood risk in the borough based on maps produced by the Environment Agency showing which areas are most likely to be affected by flooding. The maps show three different zones referring to the probability of river and sea flooding, ignoring the presence of flood defences. The Strategic Flood Risk Assessment will also take into account other types of flooding, to produce more detailed flood risk maps that can be used to help guide land use allocations within the borough.

Sui Generis – Uses which do not fall within any Use Class.

Supplementary Planning Documents (SPD) – A document expanding polices set out in Local Plans (Development Plan Documents) or providing additional detail. They can be based on a topic or issue, or for an area such as a master plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making.

Supplementary Planning Guidance (SPG) – As above, produced prior to 2004, being replaced by SPDs at the borough-level.

Sustainability Appraisal (SA) – A Sustainability Appraisal is used by planning authorities to assess whether proposed plans and policies meet sustainable development objectives and is mandatory under the Planning and Compulsory Purchase Act 2004. The aim is to promote sustainable development through the integration of social, environmental, and economic considerations into the preparation of new or revised Development Plan Documents (DPD) and Supplementary Planning Documents (SPD). It is similar to a SEA, but includes assessment of social and economic inputs, in addition to environmental inputs.

Sustainable Drainage Systems (SUDS) – A sequence of management practices and control structures designed to drain surface water from buildings and hardstandings in a sustainable way.

Tall Building – Buildings which are 7 storeys or over, or 21 metres or more from the ground level to the top of the building (whichever is lower).

Thames Policy Area (TPA) – Defined in the London Plan as a special policy area to be defined by boroughs in which detailed appraisals of the riverside will be required.

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 South West London Integrated Care System/NHS. For further information, see the Council's website at 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'. With 3G turf, the pile (the artificial grass ‘blades’) is supported by an infill of rubber crumb. Sports that can use 3G pitches include football, rugby and lacrosse, providing that certain specifications are met for each sport.

Tidal water – The part of the River Thames that is subject to tides.

Town Centres – Centres categorised in the first tier of the borough’s centre hierarchy: Richmond, Twickenham, Teddington, East Sheen, and Whitton. 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 Policies Map by a Town Centre Boundary (TCB).

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 for London (TfL) – A statutory body with a duty to develop and implement policies to promote and encourage safe, integrated, efficient and economic transport facilities and services to, from and within London; to provide or secure the provision of public passenger transport services, to, from or within Greater London; to regulate the way in which the public uses highways and is also the licensing authority for both hackney carriages (taxis) and private hire vehicles (minicabs).

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.

Tree Preservation Order (TPO) – A tree preservation order is an order made by a local planning authority in respect of trees or woodlands. The principal effect of a TPO is to prohibit the cutting down, uprooting, topping, lopping, wilful damage, or wilful destruction of trees without the LPA's consent.

The United Nations Educational, Scientific and Cultural Organization (UNESCO) – The organisation that seeks to encourage the identification, protection and preservation of cultural and natural heritage around the world considered to be of outstanding value to humanity.

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'.

Water Framework Directive (WFD) – The WFD is a European directive which aims to protect and improve the water environment (including rivers, lakes, reservoirs, streams, canals, groundwater, transitional waters or estuaries and coastal waters) through a legislative framework.

Whole life-cycle carbon - Whole life-cycle carbon emissions are the total greenhouse gas emissions arising from a development over its lifetime, from the emissions associated with raw material extraction, the manufacture and transport of building materials, to installation/ construction, operation, maintenance and eventual material disposal.

Zero Carbon (Net-zero Carbon) – Activity that causes no net release of carbon dioxide and other greenhouse gas emissions into the atmosphere. Zero-carbon therefore refers to both embodied energy and operational energy. Embodied energy refers to the energy which is used in the manufacture of the building materials, while operational energy is that which is used to heat, cool and power your home. The embodied energy of insulation, for example, is the energy which is used to create the insulation itself, while good insulation will help towards lowering a home's operational energy. A building which operates at zero carbon does not burn fossil fuels, has ultra-high energy efficiency and is 100% powered by renewable energy.

Zero-emission – Activity that causes no release of air pollutants and carbon dioxide or other greenhouse gases.

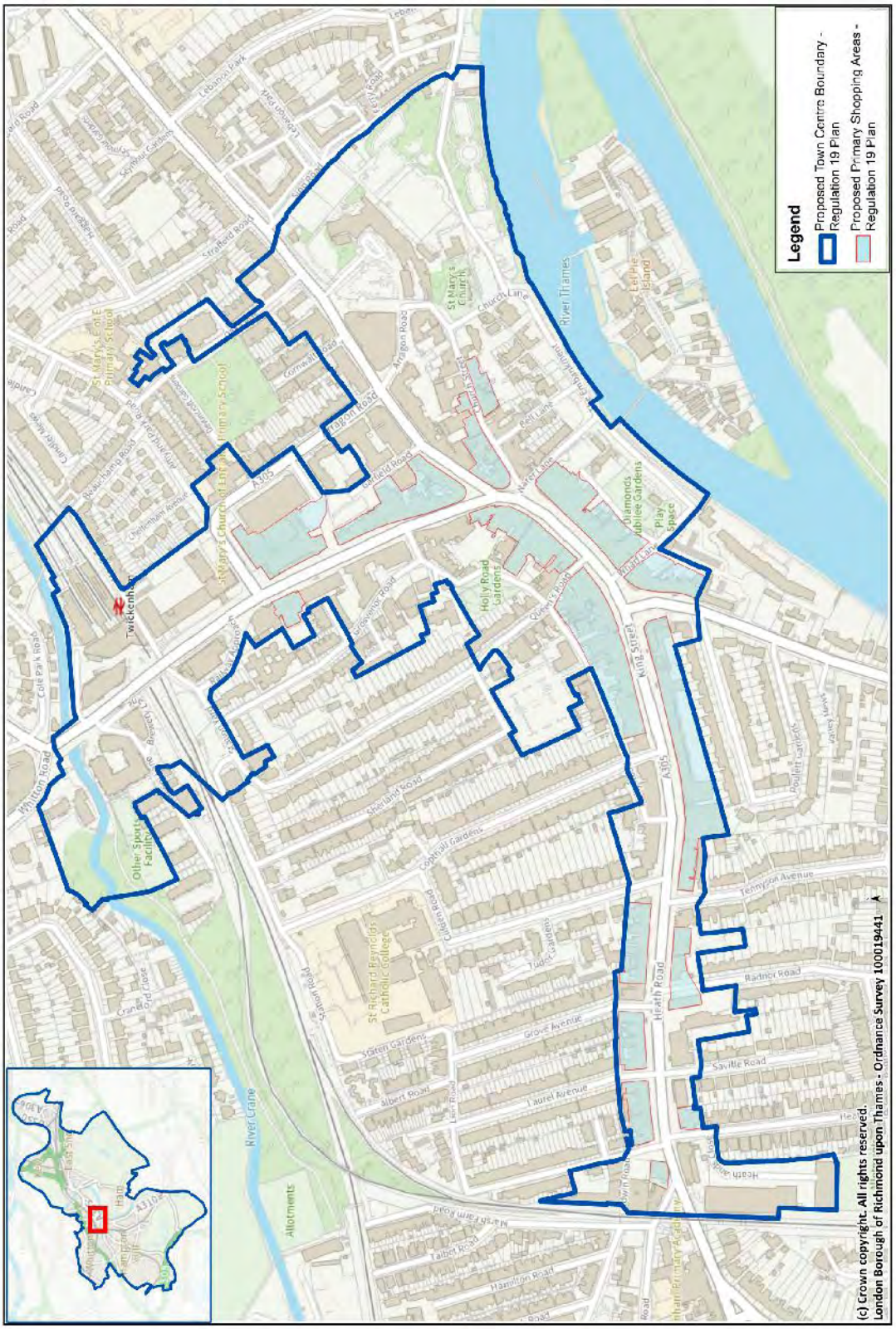
28 Appendices

Appendix 1 Maps of Proposed Town Centre Boundaries and Primary Shopping Areas, and Local Centre Boundaries

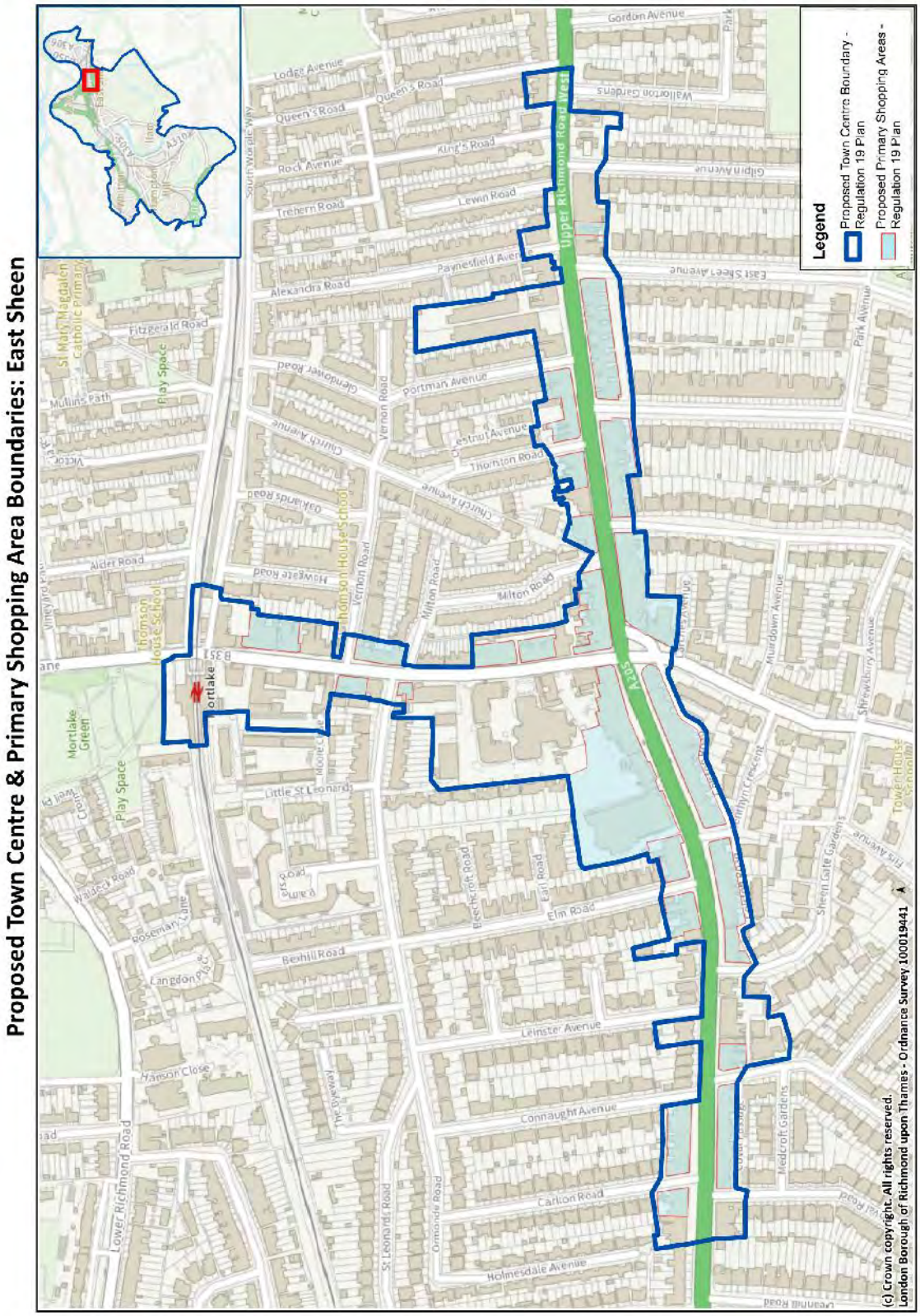
Maps of Proposed Town Centre Boundaries and Primary Shopping Areas

Proposed Town Centre & Primary Shopping Area Boundaries: Richmond

Proposed Town Centre & Primary Shopping Area Boundaries: Twickenham



Proposed Town Centre & Primary Shopping Area Boundaries: Teddington


Proposed Town Centre & Primary Shopping Area Boundaries: East Sheen
Legend
Proposed Town Centre Boundary - Regulation 19 Plan
Proposed Primary Shopping Areas - Regulation 19 Plan
Upper Richmond Road West
A205
Mortlake
Thomson House School
Play Space
Mortlake Green
Gordon Avenue
Lodge Avenue
Queen's Road
Rock Avenue
Trehern Road
King's Road
Lewin Road
Paynesfield Avenue
Alexandra Road
Fitzgerald Road
Glendoster Road
Portman Avenue
Chestnut Avenue
Thornton Road
Milton Road
Vernon Road
Church Avenue
Oakhanks Road
Hawgate Road
Alder Road
Little St Leonards
Elm Road
Bexhill Road
Leinster Avenue
Connaught Avenue
Carlton Road
Holmesdale Avenue
St Leonards Road
Lower Richmond Road
Hamson Close
Langdon Park
Walsh Road
Rosemary Lane
Beechcroft Road
Earl Road
Ormonde Road
The Driveway
Wallington Gardens
Gilpin Avenue
East Sheen Avenue
Park Avenue
Murdoch Avenue
Strawberry Avenue
Tower House School
Sheen Gate Gardens
Medcroft Gardens
Deerhurst Road
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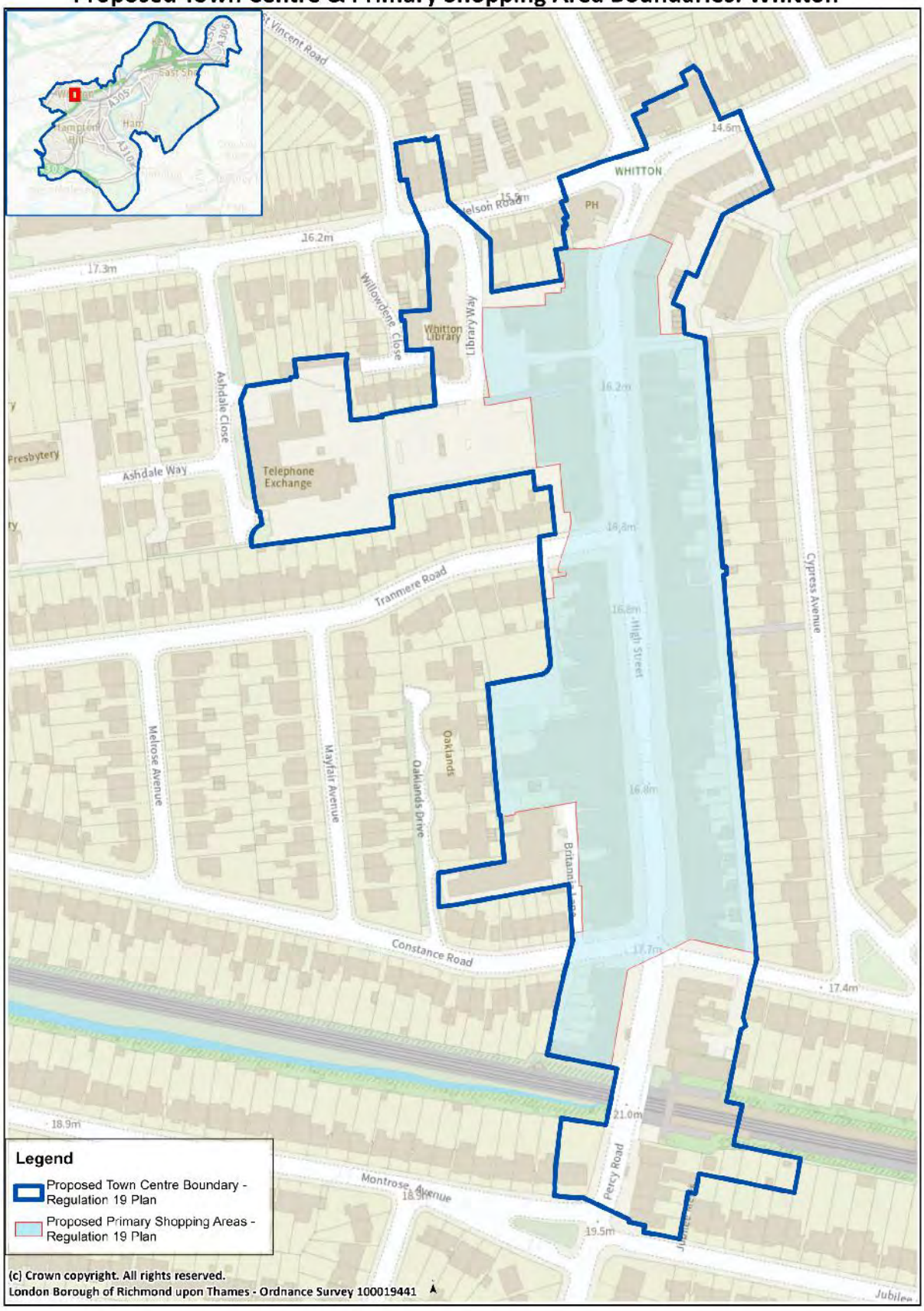
London Borough of Richmond upon Thames - Ordnance Survey 100019441

Proposed Town Centre & Primary Shopping Area Boundaries: Whitton



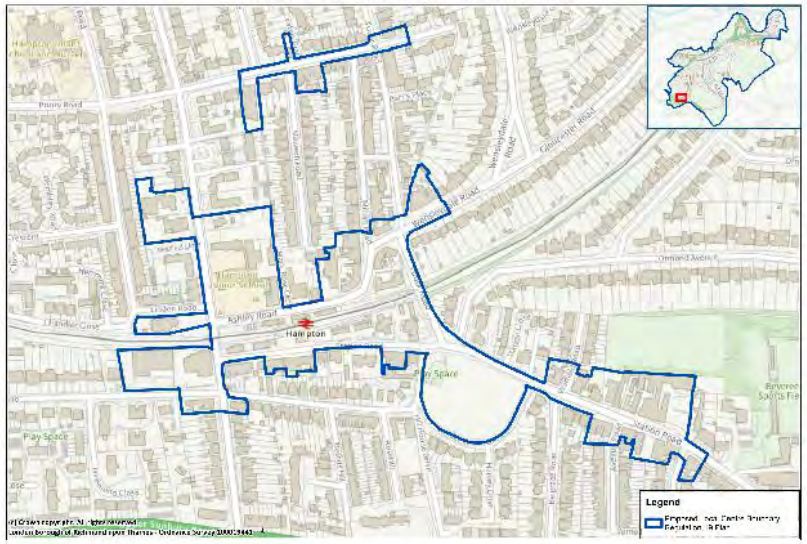
Maps of Proposed Local Centre Boundaries

Local Centres

Proposed Local Centre Boundary: Barnes

Proposed Local Centre Boundary: East Twickenham

Proposed Local Centre Boundary: Hampton Village



Proposed Local Centre Boundary: Hampton Hill

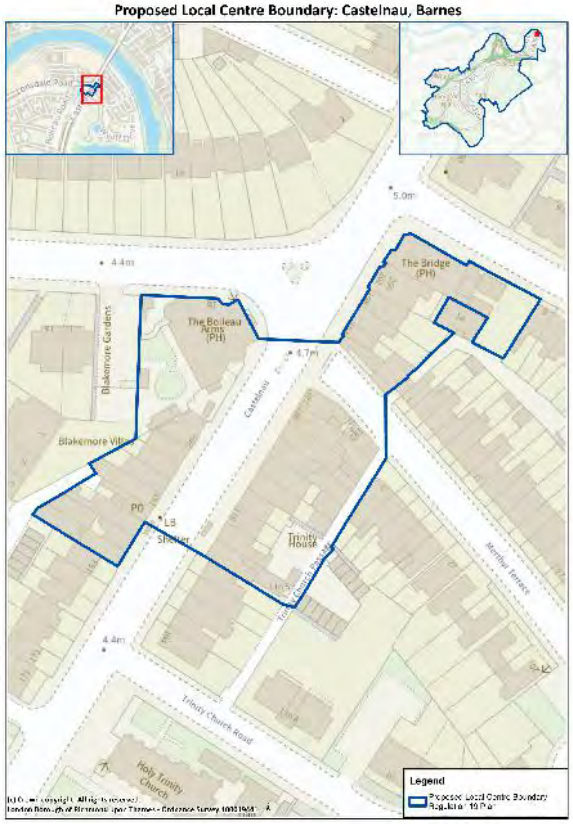
Proposed Local Centre Boundary: St Margarets

Proposed Local Centre Boundary: Kew Gardens

Proposed Local Centre Boundary: Ham Parade

Neighbourhood Centres

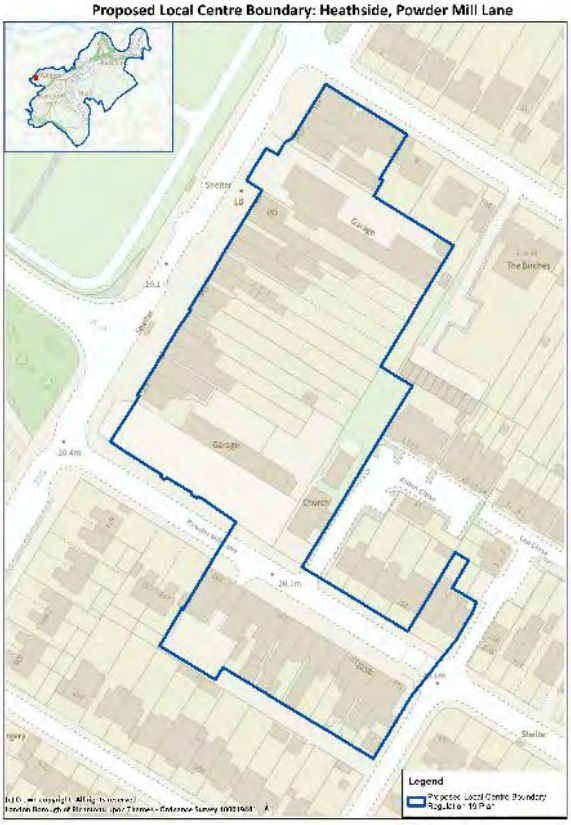
Proposed Local Centre Boundary: Castelnau, Barnes



Proposed Local Centre Boundary: Friars Stile Road

Proposed Local Centre Boundary: Hampton Wick

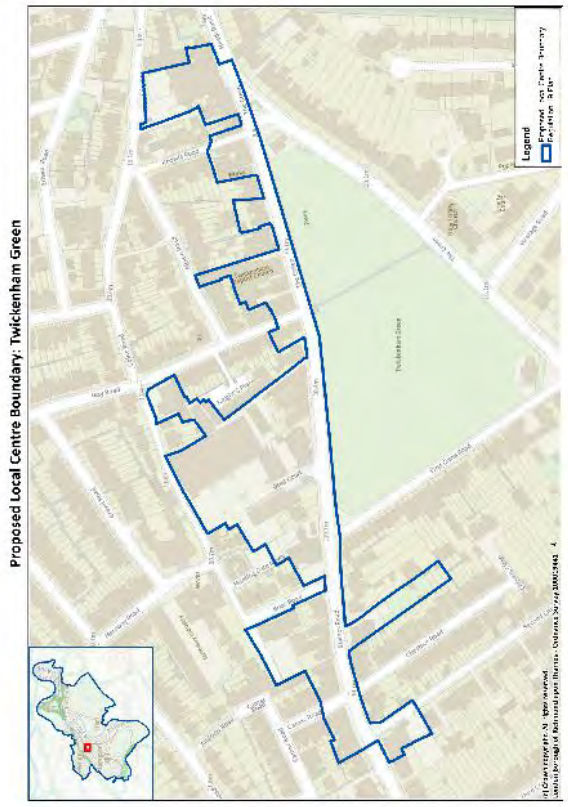
Proposed Local Centre Boundary: Heathside, Powder Mill Lane



Proposed Local Centre Boundary: Kingston Road

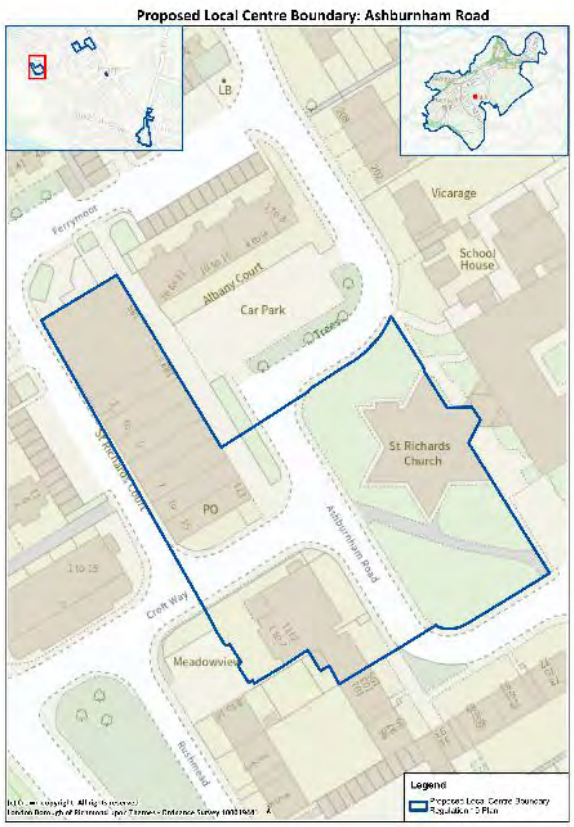
Proposed Local Centre Boundary: Stanley Road

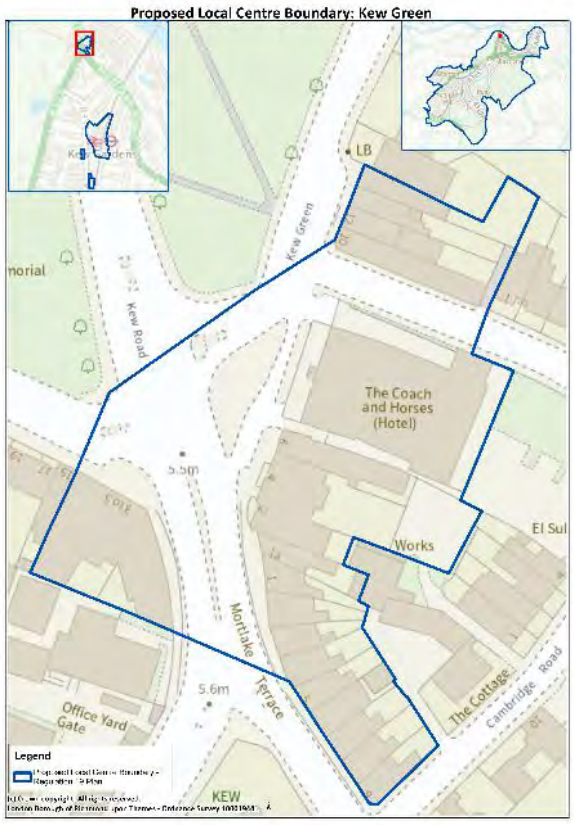
Proposed Local Centre Boundary: White Hart Lane

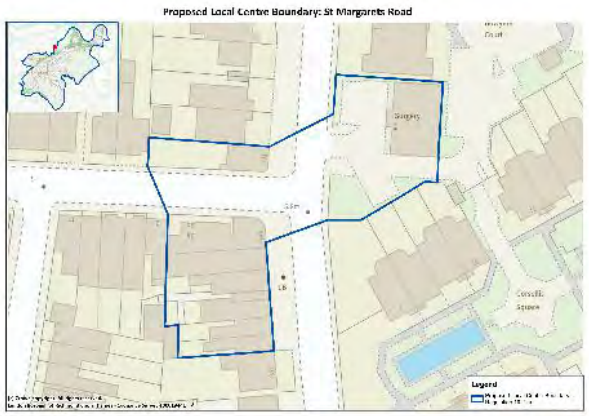

Proposed Local Centre Boundary: Twickenham Green
Legend

Proposed Local Centre Boundary: Sheen Road, Richmond
Legend
Sheen Park
Alton Road
Dunstable Road
Sydney Road
Worple Way
Sheen Road
Ambulance Station

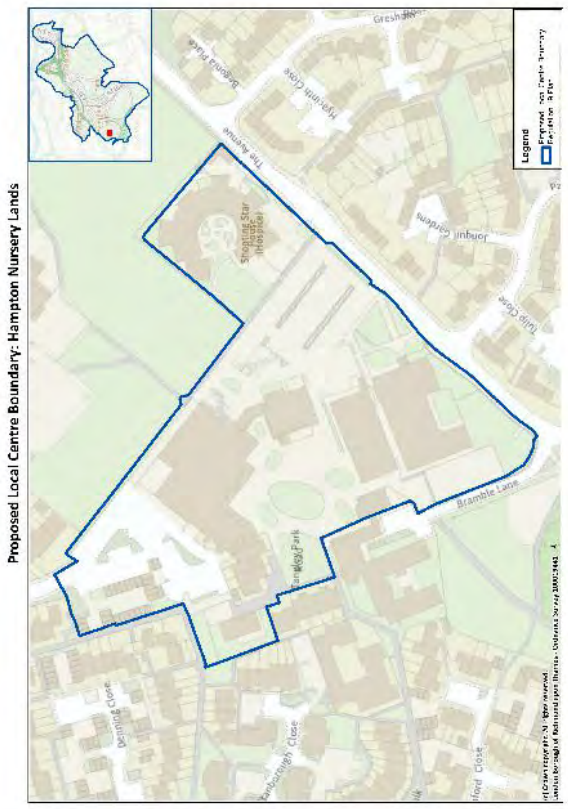
Important Local Parades



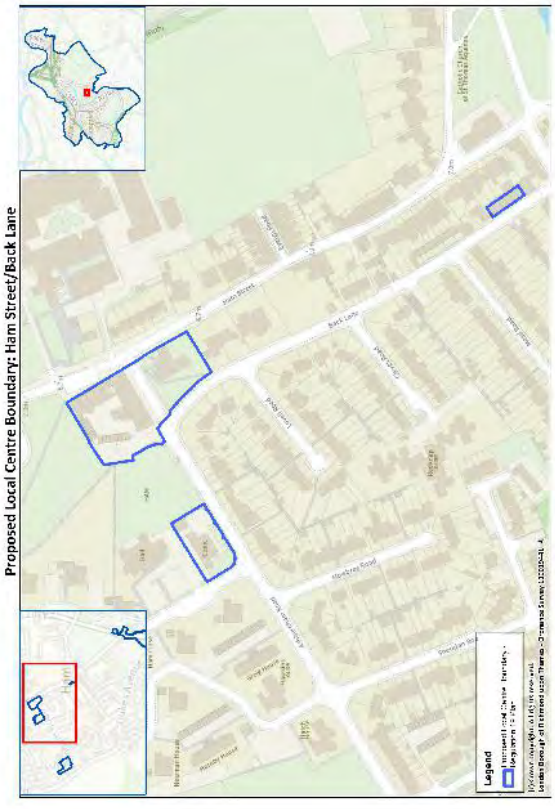


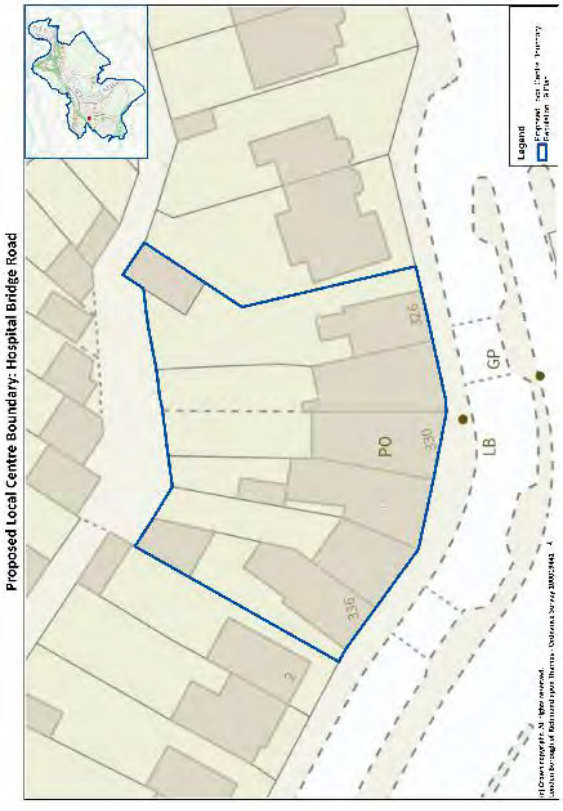


Proposed Local Centre Boundary: Sandycombe Road, Kew
Legend

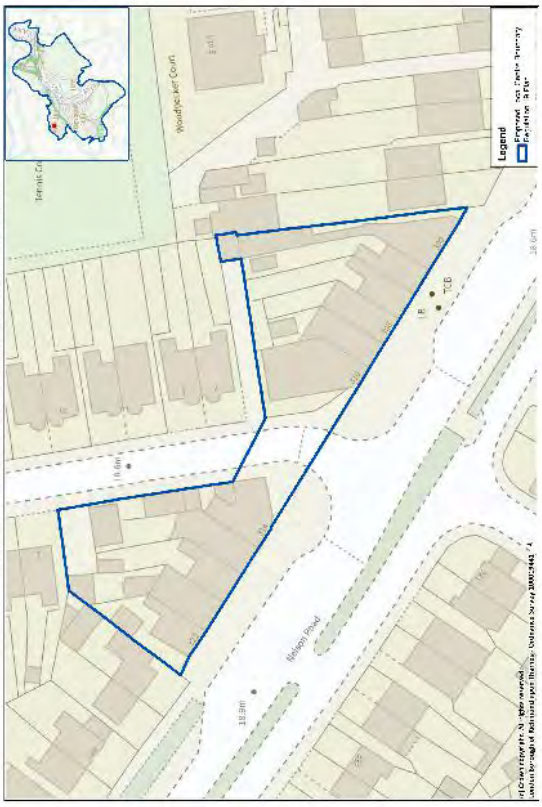

Proposed Local Centre Boundary: Hampton Nursery Lands
Legend
Bramble Lane
Hampton Close
Beverley Park
Hurst Close

Proposed Local Centre Boundary: Kew Road
Legend
Evelyn Gardens
Blue Anchor Alley
Kew Road
Evelyn Road
Shaftesbury Road
The Falcons Preparatory School for Boys
Rosedale Road
Mitchledale Drive

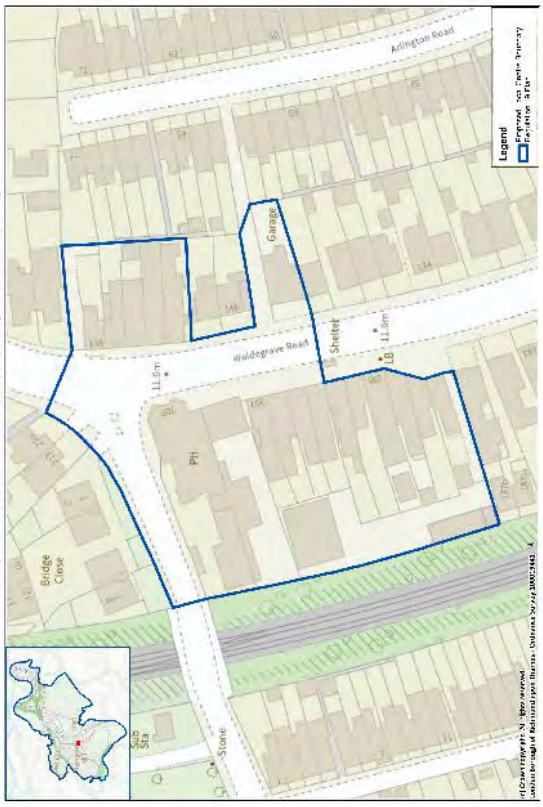

Proposed Local Centre Boundary: Ham Street/Back Lane
Legend
Ham Street
Back Lane
Mortimer Road


Proposed Local Centre Boundary: Hospital Bridge Road
Legend
PO
LB
GP
326
330
336

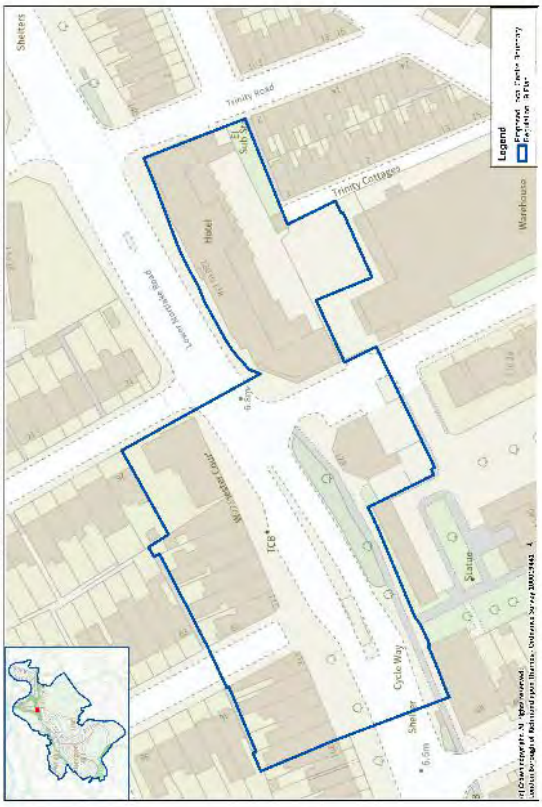
Proposed Local Centre Boundary: Nelson Road, Twickenham



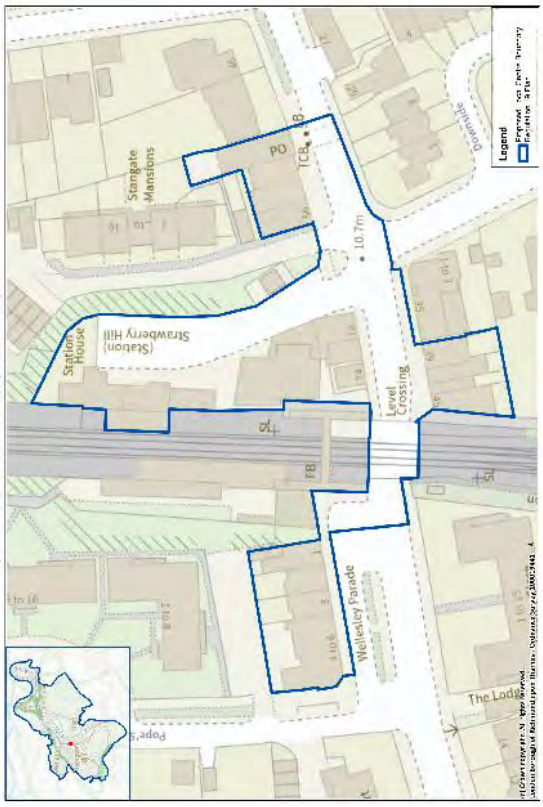
Proposed Local Centre Boundary: Waldegrave Road, Teddington

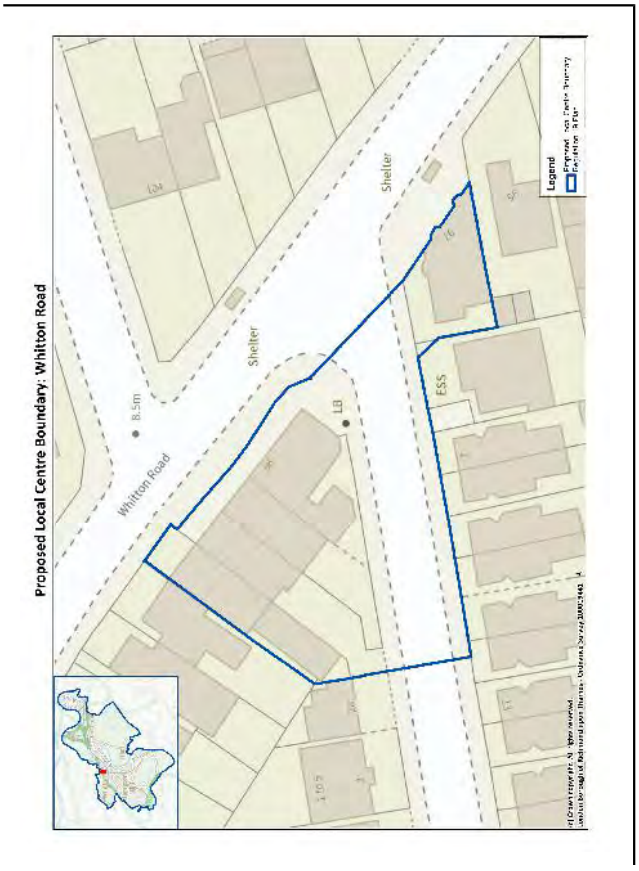


Proposed Local Centre Boundary: Lower Mortlake Road



Proposed Local Centre Boundary: Strawberry Hill




Proposed Local Centre Boundary: Whitton Road
Legend
Shelter
Shelter
Whitton Road
8.5m
LB
ESS

Appendix 2 Marketing Requirements

28.1 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 18 'Development in Centres'
- Policy 20 'Shops and Services Serving Essential Needs'
- Policy 23 'Offices '
- Policy 24 'Industrial Land'
- Policy 40 'Rivers and River Corridors '
- Policy 49 'Social and Community Infrastructure (Strategic Policy)'

28.2 This appendix sets out the details that should be provided to enable officers to assess the acceptability or otherwise of the marketing undertaken. The Council's assessment will consider the overall length, type and quality of the marketing to come to a view, and if the applicant/agent puts forward any justification for any shortcomings in the marketing (e.g. the use of only one specialist website rather than a range of generic websites due to the nature of the existing employment use, or that a marketing board was not used because of advertisement controls) these will be considered, however the expectation is the below requirements should be fully addressed.

28.3 Marketing should always involve a robust and active marketing campaign and should:

- Be ongoing for a minimum period as set out in the table below.
- 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.

Table 28.1 Marketing Requirements

Land Use	Local Plan Policy	Minimum Marketing Period
Commercial or community use (in designated centres)	Policy 18	2 years
Local shops and services (selling essential goods and services)	Policy 20	2 years
Public Houses	Policy 20	2 years
River-dependent or river-related industrial and business uses	Policy 40	2 years
Social and community infrastructure	Policy 49	18 Months
Offices	Policy 23	2 years
Industrial land	Policy 24	2 years

28.4 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.

28.5 All marketing undertaken must meet the requirements as set out above and a marketing report must be submitted which includes the details set out. More specific marketing requirements are required for different types of uses, as set out below.

Retail (E(a) Use Class)

28.6 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 E(a) 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 a retail use or where the loss (including ancillary floorspace) is very substantial.

Pubs (Sui Generis use)

28.7 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 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 49 'Social and Community Infrastructure (Strategic Policy)'and the requirements

set out below under the heading for Social and Community Infrastructure.

28.8 Please note that the Council will take into account the considerations set out in the supporting text to Policy 20 'Shops and Services Serving Essential Needs'including whether there is another public house within 400 metres. Applicants should address this when submitting a planning application.

Offices (E (g) (i) or (g) (ii) Use Class)

28.9 Where a proposal involves a change of use or redevelopment resulting in a loss of office space, 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 workspace requirements should be explored. This may include a viability assessment addressing the feasibility of refurbishing or modernising the existing office space.

28.10 Please note that provision of marketing will not be accepted as justification for an exception to policy; there should be no net loss of office floorspace.

Industrial land and business parks (E (g) (ii) or (g) (iii), B2, B8 Use Class and Sui Generis uses)

28.11 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.

28.12 Please note that provision of marketing will not be accepted as justification for an exception to policy; there should be no net loss of ~~office~~ *industrial* floorspace.

28.13 Where a proposal involves a change of use or redevelopment resulting in a loss of river-dependent or river-related industrial and business uses, marketing must clearly demonstrate that there is no longer any demand for river-dependent or river-related use(s) in this location and that there is not likely to be in the foreseeable future. This should include both traditional and modern industries, including the construction, repair, servicing and sale of river craft and uses related to the function of the River Thames for transportation, communication and recreation. Marketing must be based on a price commensurate with the existing quality or condition of the site, based on the local market by reference to comparables in the locality.

Social and Community Infrastructure (within E, F Use Classes and Sui Generis uses)

28.14 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 49 'Social and Community Infrastructure (Strategic Policy)'. 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 South West London Integrated Care System to discuss their needs for health floorspace in the area.

NEW Appendix 3 Tall and Mid-Rise Building Zones

~~Darker~~ *Red* colours on the Tall and Mid-Rise Building Zone maps *show areas appropriate for tall buildings and orange colours show areas appropriate for mid-rise buildings. Darker colours* indicate more potential for height and the light colours indicate less potential for height. Maps should be read in conjunction with the explanatory text accompanying Section 4.6 'Tall and Mid-Rise Buildings' in the Urban Design Study.

Teddington (railway side): Mid Rise Zone

Appropriate height: 5-6 storeys (15-18m)

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Broom Park (Hampton Wick): Mid Rise Zone

Appropriate height: 5-6 storeys (15-18m)

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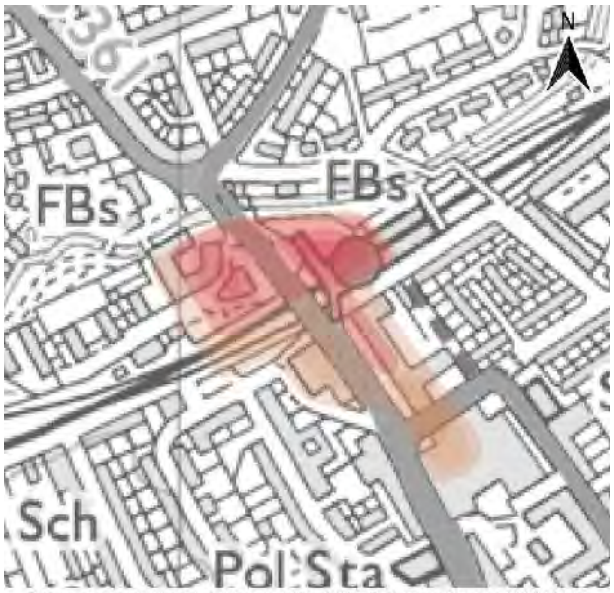
Twickenham Station: Tall Building Zone

Appropriate height: 7-10 storeys (21-30m)



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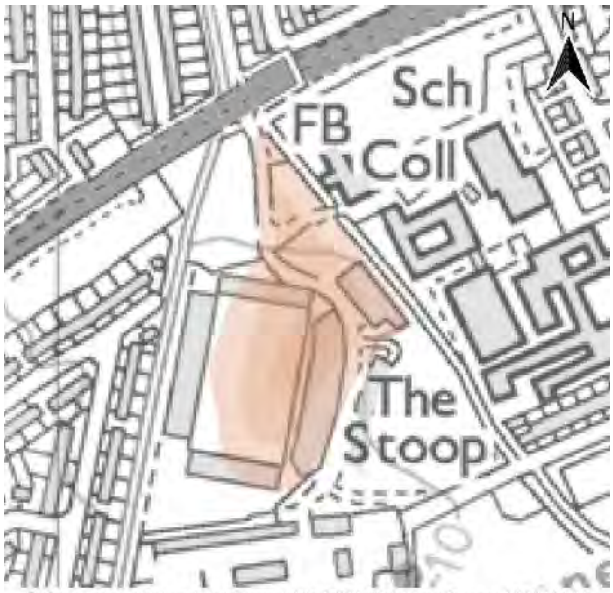
The Stoop (Twickenham): Mid Rise Zone

Appropriate height: 5-6 storeys (15-18m)



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Whitton Town Centre: Mid Rise Zone

Appropriate height: 5-6 storeys (15-18m)

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Ham Close (Ham): Mid Rise Zone

Appropriate height: 5-6 storeys (15-18m)

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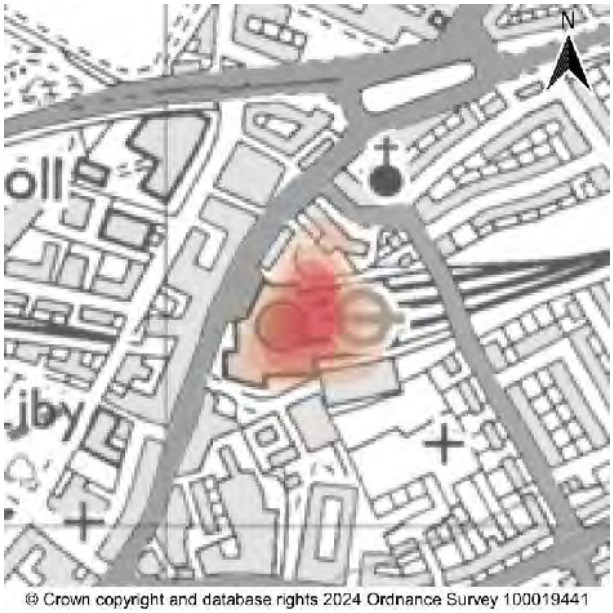
Richmond Station: Tall Building Zone

Appropriate height: 7-8 storeys (21-24m)

Richmond Station: Mid Rise Zone

Appropriate height: 5-6 storeys (15-18m)



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North Sheen (Lower Richmond Road): Tall Building Zone

Appropriate height: 7-8 storeys (21-24m)

North Sheen (Lower Richmond Road): Mid Rise Zone

Appropriate height: 5-6 storeys (15-18m)

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Kew Retail Park: Tall Building Zone

Appropriate height: 7 storeys (21m)

Kew Retail Park: Mid Rise Zone

Appropriate height: 5-6 storeys (15-18m)

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Stag Brewery (Mortlake): Tall Building Zone

Appropriate height: 7 storeys (21m)

Stag Brewery (Mortlake): Mid Rise Zone

Appropriate height: 5-6 storeys (15-18m)

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Kneller Hall (Whitton): Mid Rise Zone

Appropriate Height: 5 storeys (15m)

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Whitton Community Centre: Mid-Rise Building Zone

Appropriate Height: 5 storeys (15m)

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St Clare (Hampton Hill): Mid-Rise Building Zone

Appropriate Height: 5 storeys (15m)

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SUPERSEDED Appendix 3 Tall and Mid-Rise Building Zones

Darker *Red* colours on the Tall and Mid-Rise Building Zone maps *show areas appropriate for tall buildings and orange colours show areas appropriate for mid-rise buildings. Darker colours* indicate more potential for height and the light colours indicate less potential for height. Maps should be read in conjunction with the explanatory text accompanying Section 4.6 'Tall and Mid-Rise Buildings' in the Urban Design Study.

Teddington (railway side): Mid Rise Zone

Appropriate height: 5-6 storeys (15-18m)

Broom Park (Hampton Wick): Mid Rise Zone

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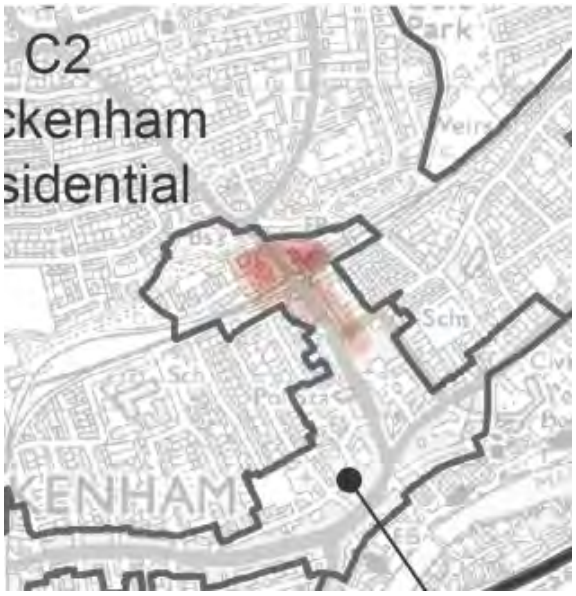
Appropriate height: 7-10 storeys (21-30m)

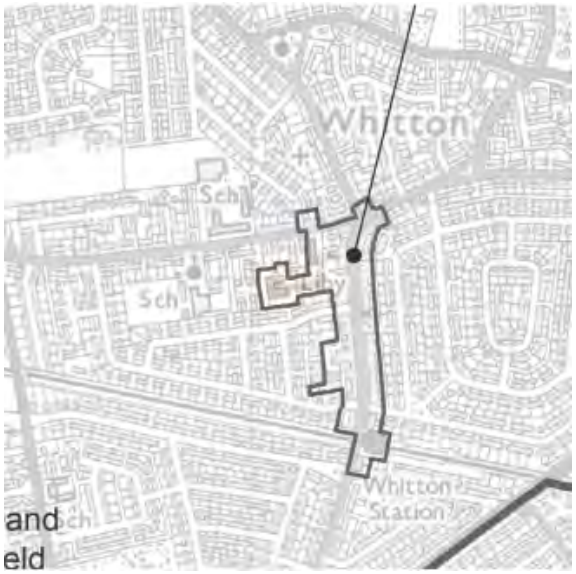


The Stoop (Twickenham): Mid Rise Zone

Appropriate height: 5-6 storeys (15-18m)

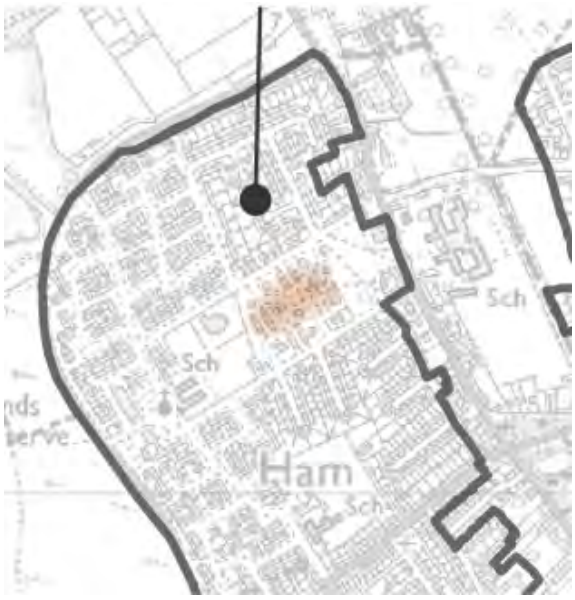
~~Whitton Town Centre:~~ ~~Mid Rise Zone~~

~~*Appropriate height: 5-6 storeys (15-18m)*~~



~~Ham Close (Ham):~~ ~~Mid Rise Zone~~

~~*Appropriate height: 5-6 storeys (15-18m)*~~



~~Richmond Station:~~ ~~Tall Building Zone~~

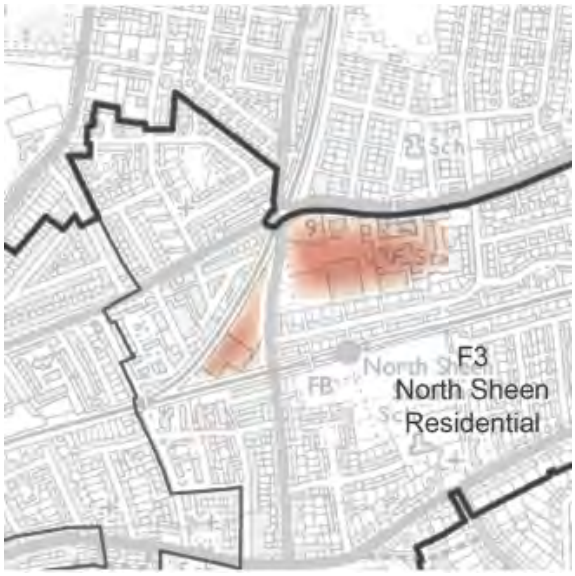
~~*Appropriate height: 7-8 storeys (21-24m)*~~

~~Richmond Station:~~ ~~Mid Rise Zone~~

~~*Appropriate height: 5-6 storeys (15-18m)*~~

~~**North Sheen (Lower Richmond Road):** Tall Building Zone~~
~~*Appropriate height: 7-8 storeys (21-24m)*~~

~~**North Sheen (Lower Richmond Road):** Mid Rise Zone~~
~~*Appropriate height: 5-6 storeys (15-18m)*~~

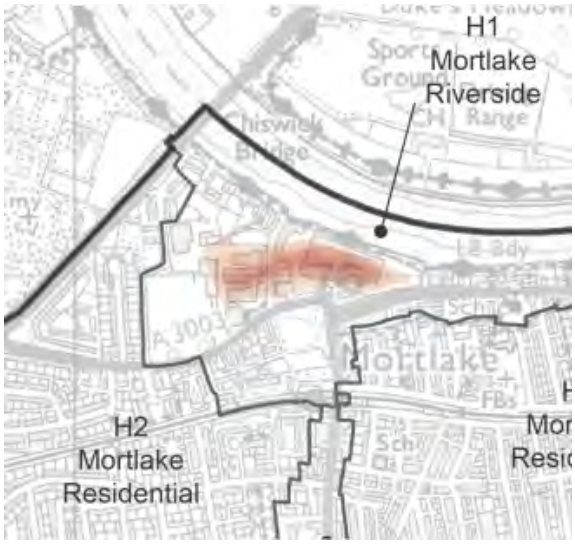


~~**Kew Retail Park:** Tall Building Zone~~
~~*Appropriate height: 7 storeys (21m)*~~

~~**Kew Retail Park:** Mid Rise Zone~~
~~*Appropriate height: 5-6 storeys (15-18m)*~~

~~**Stag Brewery (Mortlake):** Tall Building Zone~~
~~*Appropriate height: 7 storeys (21m)*~~

~~**Stag Brewery (Mortlake):** Mid Rise Zone~~
~~*Appropriate height: 5-6 storeys (15-18m)*~~



~~Kneller Hall (Whitton):~~ ~~Mid Rise Zone~~
~~*Appropriate Height: 5 storeys (15m)*~~

~~Whitton Community Centre:~~ ~~Mid-Rise Building Zone~~
~~*Appropriate Height: 5 storeys (15m)*~~

~~St Clare (Hampton Hill):~~ ~~Mid-Rise Building Zone~~
~~*Appropriate Height: 5 storeys (15m)*~~

NEW Appendix 4: Review of Sites of Importance for Nature Conservation

Richmond SINCs

Map 28.1 Richmond SINCs

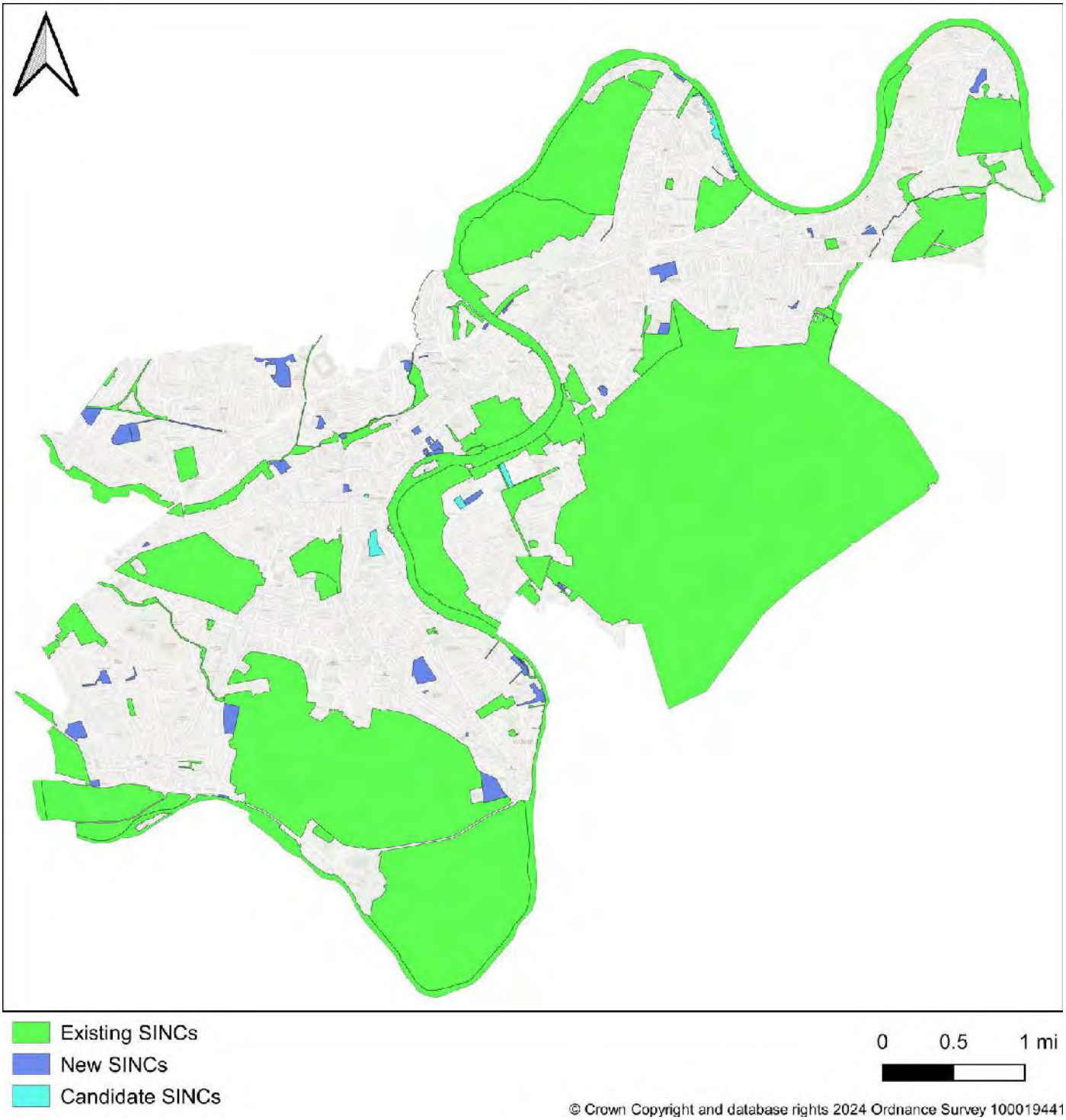


Table 28.2 Richmond SINCS

No.	Site Ref	Site Name	Grade	Area (Ha)	Status
1	RiB27	Cassel Hospital	Borough Grade	3.489	Upgraded
2	RiB23	Kew Pond and Kew Green	Borough Grade	5.398	Upgraded
3	RiL09	Old Mortlake Burial Ground	Local Grade	1.448	Existing
4	RiL30	Kew Meadow Path	Local Grade	0.108	Downgraded
5	RiL15	Churchyard of St Mary with St Alban, Teddington	Local Grade	0.517	Existing
6	RiB12	Barn Elms Playing Fields	Borough Grade	3.469	Existing
7	M084	Bushy Park and Home Park	Metropolitan Grade	650.316	Existing
8	RiB14	The Copse, Holly Hedge Field and Ham Avenues	Borough Grade	12.165	Existing
9	M081	Hounslow Heath	Metropolitan Grade	0.833 *(within LBRuT boundary)*	Existing
10	RiB26	Terrace Field and Terrace Garden	Borough Grade	6.603	Upgraded
11	RiB22	St Margarets Residential Grounds	Borough Grade	5.015	Existing
12	RiL25	Moormead Recreation Ground	Local Grade	4.945	Existing
13	RiB07	Fulwell and Twickenham Golf Courses	Borough Grade	80.432	Existing
14	RiB25	Ham Common west	Borough Grade	8.508	Upgraded
15	RiL27	Townmead Allotments, Kew	Local Grade	0.183	New Site
16	RiL03	Pensford Field	Local Grade	0.825	Existing
17	M087	London Wetland Centre	Metropolitan Grade	42.288	Existing
18	RiB02	Leg 'o' Mutton Reservoir LNR	Borough Grade	8.168	Existing
19	RiL18	Beveree Wildlife Site	Local Grade	0.598	Existing
20	RiB15	Whitton Railsides	Borough Grade	0.868	New Site
21	RiL07	Hampton Court House Grounds	Local Grade	2.305	Existing
22	M082	Richmond Park and Associated Areas	Metropolitan Grade	1081.193	Existing
23	RiL28	The Wilderness	Local Grade	0.518	Existing
24	RiB31	Twickenham Cemetery	Borough Grade	7.769	Upgraded
25	RiB16	Petersham Lodge Wood and Ham House Meadows	Borough Grade	9.818	Existing
26	RiB08	Duke of Northumberland's River south of Kneller Road	Borough Grade	0.625	Existing
27	M031	River Thames and tidal tributaries	Metropolitan Grade	243.37 *(within LBRuT boundary)*	Existing
28	RiL02	Marble Hill Park and Orleans House Gardens	Local Grade	31.257	Existing
29	RiL26	Garricks Lawn	Local Grade	0.319	New Site
30	RiB30	Teddington Cemetery	Borough Grade	5.494	Upgraded
31	RiL19	North Sheen and Mortlake Cemeteries	Local Grade	24.674	Existing
32	RiL01	St James' Churchyard, Hampton Hill	Local Grade	0.72	Existing
33	RiB09	Strawberry Hill Golf Course	Borough Grade	20.362	Existing
34	RiB28	Trowlock Avenue riverside land, Teddington	Borough Grade	1.686	New Site

35	RiB24	Portlane Brook and Meadow	Borough Grade	4.335	Upgraded
36	RiL16	Langdon Park	Local Grade	5.032	Existing
37	M076	Crane Corridor	Metropolitan Grade	34.349 *(within LBRuT boundary)*	Existing
38	RiL17	Twickenham Road Meadow	Local Grade	2.788	Existing
39	RiL29	St Andrews Churchyard	Local Grade	0.379	New Site
40	RiL20	Hampton Cemetery	Local Grade	1.043	Existing
41	M154	Royal Botanic Gardens, Kew	Metropolitan Grade	122.72	Existing
42	M083	Ham Lands	Metropolitan Grade	76.783	Existing
43	RiB19	Hounslow, Feltham and Whitton junctions	Borough Grade	4.638	Existing
44	RiL06	East Sheen and Richmond Cemeteries and Pesthouse Common	Local Grade	16.604	Existing
45	RiB06	Longford River in Richmond	Borough Grade	5.748	Existing
46	RiB20	River Crane at St Margarets	Borough Grade	1.176	Existing
47	RiL23	Hampton Common	Local Grade	13.163	Existing
48	RiB01	Royal Mid-Surrey Golf Course	Borough Grade	81.946	Existing
49	RiB13	Beverley Brook from Richmond Park to the River Thames	Borough Grade	9.757	Existing
50	RiB32	Udney Park	Borough Grade	5.181	New Site
51	RiB04	Duke of Northumberland's River north of Kneller Road	Borough Grade	0.734	Existing
52	RiB17	Oak Avenue Local Nature Reserve	Borough Grade	1.803	Existing
53	RiB29	Twickenham Junction Rough	Borough Grade	4.699	Upgraded
54	M085	Hampton Water Treatment Works and Reservoirs	Metropolitan Grade	65.425	Upgraded
55	RiB03	Hydes Field	Borough Grade	15.687	Existing
56	RiB18	Hatherop Conservation Area	Borough Grade	4.16	Existing
57	RiB10	Petersham Meadows	Borough Grade	14.386	Existing
58	RiB11	Occupation Lane, Kew Embankment & Snail Reserve	Borough Grade	1.823	Existing
59	RiL12	Barnes Green and Pond	Local Grade	3.324	Existing
60	M086	Barnes Common	Metropolitan Grade	51.969	Existing
61	RiB33	American University	Borough Grade	0.767	New Site
62	RiB34	Kneller Hall	Borough Grade	6.7	New Site
63	RiB35	Oak Lane Cemetery	Borough Grade	0.61	New Site
64	RiB36	Hounslow Cemetery	Borough Grade	2.73 *(within LBRuT boundary)*	New Site
65	RiL31	Borough Cemetery, Powder Mill Lane	Local Grade	3.865	New Site
66	RiL32	Broom Road Recreation Ground	Local Grade	2.225	New Site
67	RiL33	Challenge Court open space	Local Grade	0.885	New Site
68	RiL35	Jubilee Meadow (Heathfield Nature Park)	Local Grade	2.19	New Site
69	RiL36	Nursery Green, Linear Walk & Partridge Green	Local Grade	2.077	New Site

70	RiL37	School House Lane Orchard	Local Grade	0.097	New Site
71	RiL38	St Mary Magdalen, RC Churchyard, Mortlake	Local Grade	0.317	New Site
72	RiL39	St Mary The Virgin, Church Street, Twickenham	Local Grade	0.29	New Site
73	RiB21	Orford House (former St Michaels Convent)	Borough Grade	0.722	Existing
74	RiL40	Palewell Park Allotments	Local Grade	0.31	New Site
75	RiL41	Cavendish House Allotments	Local Grade	0.932	New Site
76	RiL42	Ham Lands Allotments (also referred to as Walnut Tree Allotments)	Local Grade	1.351	New Site
77	RiL43	Twickenham Bridge Allotments	Local Grade	0.27	New Site
78	RiL44	Briar Road Allotments	Local Grade	1.946	New Site
79	RiL45	Marsh Farm Allotments	Local Grade	0.37	New Site
80	RiL46	Heath Gardens Allotments	Local Grade	0.518	New Site
81	RiL47	Bushy Park Allotments	Local Grade	4.816	New Site
82	RiL48	Hatherop Road Allotments	Local Grade	3.422	New Site
83	RiL49	Barn Elms Allotments	Local Grade	2.237	New Site
84	RiL50	Royal Paddocks Allotments	Local Grade	5.992	New Site
85	RiL51	Short Lots Allotments	Local Grade	0.495	New Site
86	RiL52	Westfields Allotments	Local Grade	0.698	New Site
87	RiL53	St Anne's Passage Allotments	Local Grade	0.098	New Site
88	RiL54	Manor Road Allotments	Local Grade	3.998	New Site
89	RiL55	Old Palace Lane Allotments	Local Grade	0.363	New Site
90	RiL56	Queens Road Allotments	Local Grade	1.428	New Site
91	RiL57	Brook Road Allotments	Local Grade	0.139	New Site
92	RiL58	South Close Allotments	Local Grade	0.186	New Site
93	RiL59	Collis Primary School	Local Grade	0.105	New Site
94	RiL60	Oldfield Road Meadow	Local Grade	0.644	New Site
95	RiL61	York House Gardens	Local Grade	2.106	New Site

New candidate sites awaiting site survey (pending, subject to access requests)

Table 28.3 Richmond Candidate SINCs

Site Number	Site Name
1	Grotto Road Open Space
2	Ham Polo Club
4	Kew Riverside including Kew Biothane Sewage Treatment Works
5	Riverside Drive Paddocks
6	St Mary's University

New SINCs and changes recommended to existing boundaries

For further information on these changes, please see our website for the November 2021, November 2022 and September 2023 reports produced for the London Borough of Richmond upon Thames, as well as a letter dated October 2023 regarding walk-over surveys.

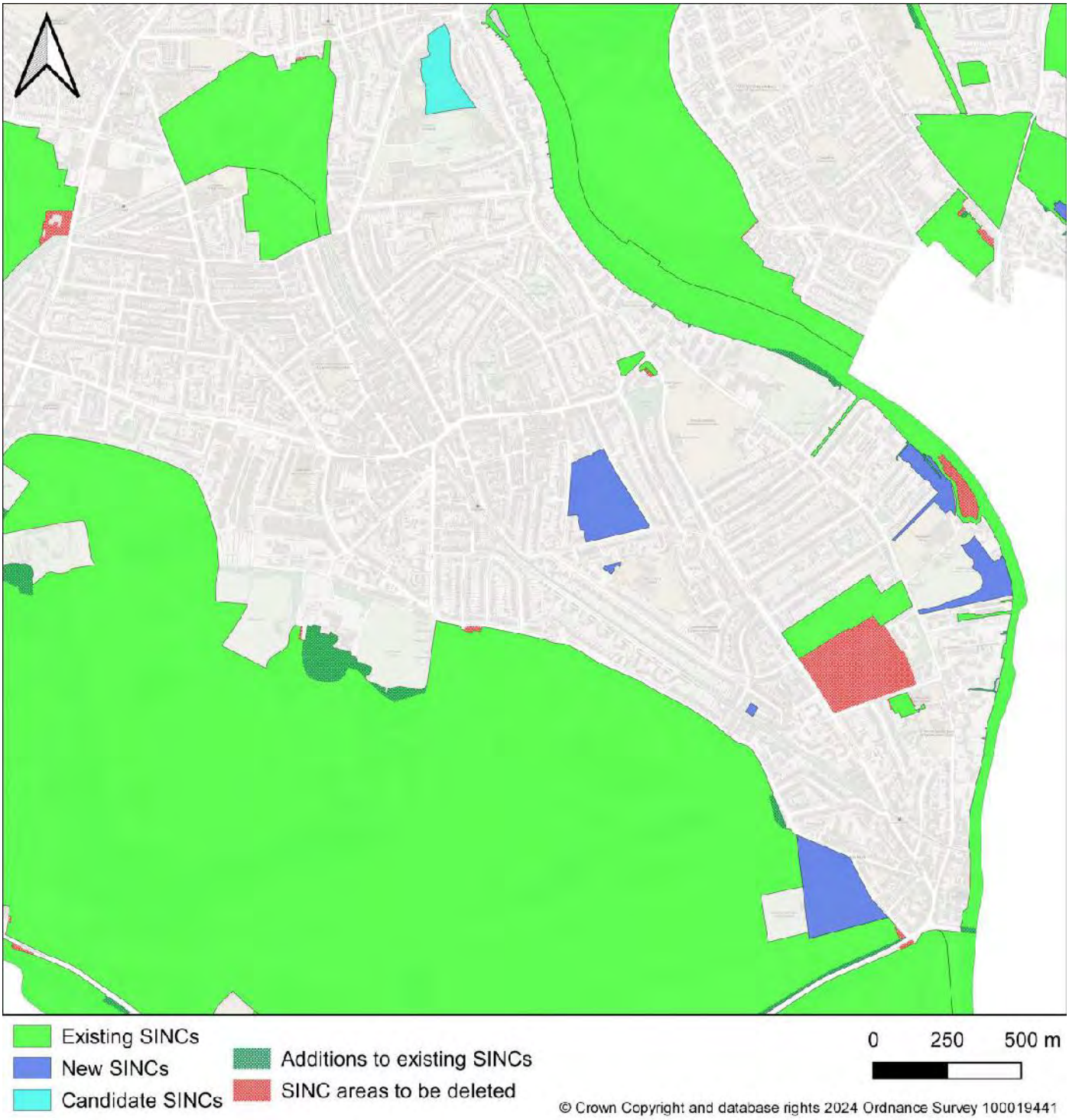
Allotment sites in the borough have been added as sites of local importance due to the nature of their characteristics and their contribution to provision of mixed habitats; individual site surveys were not considered necessary to support this level of designation.

Previous versions of Local Plans and their associated Policies Maps have identified Other Sites of Nature Importance (OSNIs) as those sites which have either been classified as having importance for biodiversity or have the potential to have biodiversity. This site terminology is being updated as part of this Local Plan and brought in line with the London Plan; they will now be identified as Sites of importance for Nature Conservation (SINCs).

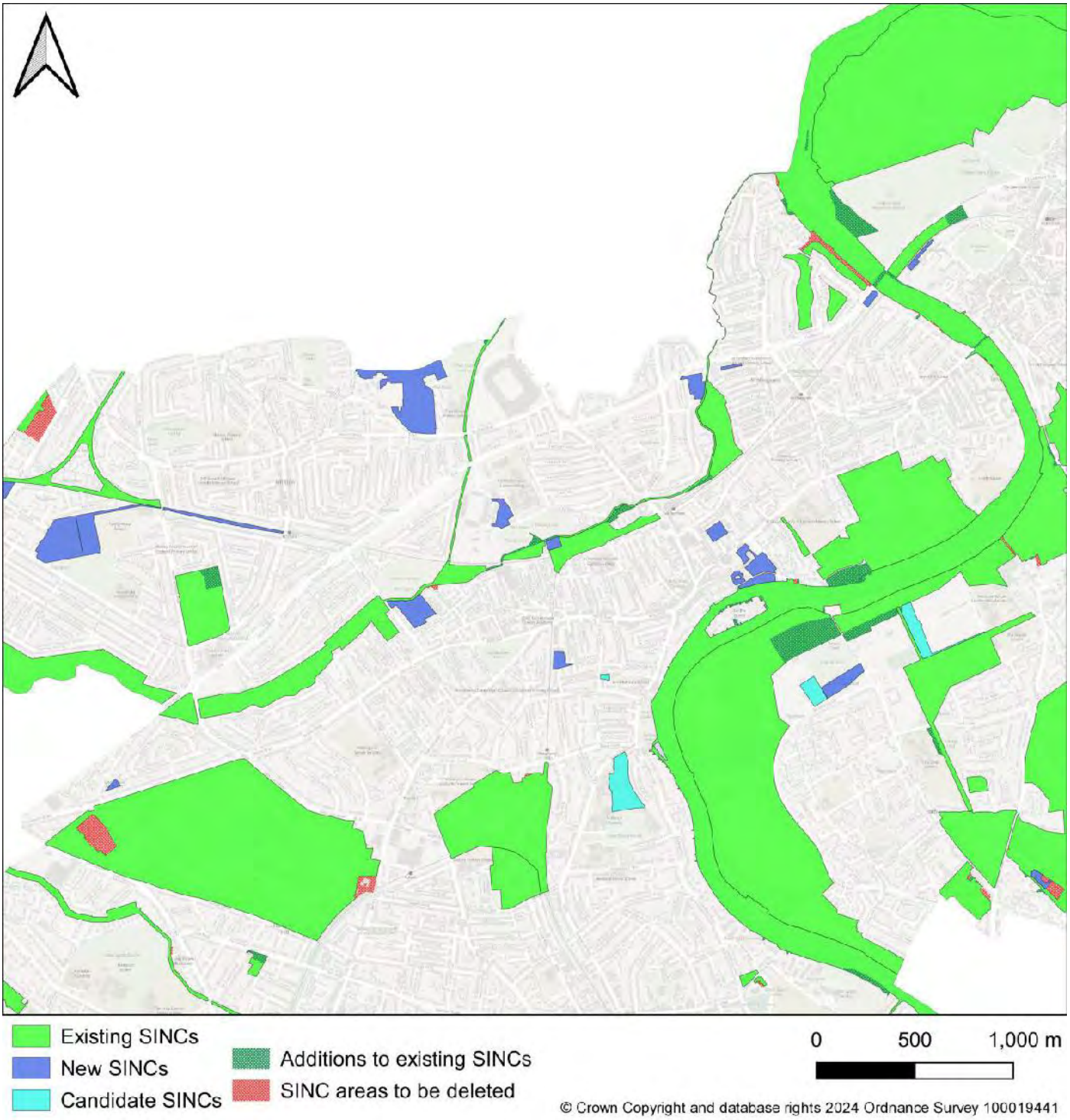
Since the 'Publication' Richmond Local Plan was submitted to the Planning Inspectorate in January 2024, GIS data for SINCs has been reviewed for potential boundary and/or naming discrepancies and amalgamations. This included consideration of adopted OSNI boundaries held by LBRuT, and those held by Greenspace Information for Greater London (GiGL) which were used to support the comprehensive review of SINCs. Maps 28.2 to 28.10 show existing, new, and candidate SINCs, as well as additions and removals from existing SINCs compared to OSNIs as adopted in 2018.

Map 28.2 Changes to existing SINCs and new SINC designations in Hampton & Hampton Hill areas

Map 28.3 Changes to existing SINCs and new SINC designations in Teddington & Hampton Wick areas

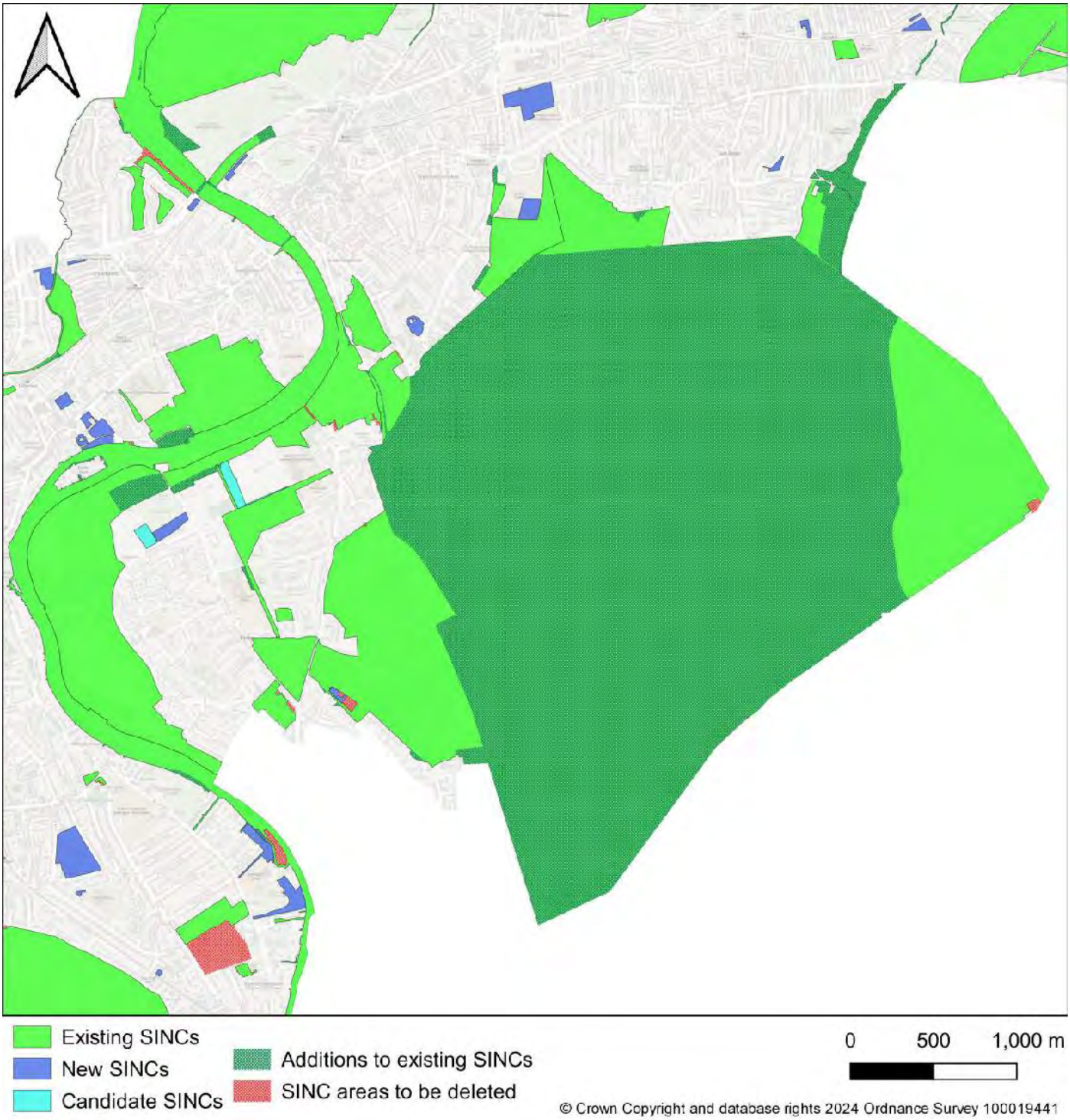


Map 28.4 Changes to existing SINCs and new SINC designations in Twickenham, Strawberry Hill & St Margarets areas



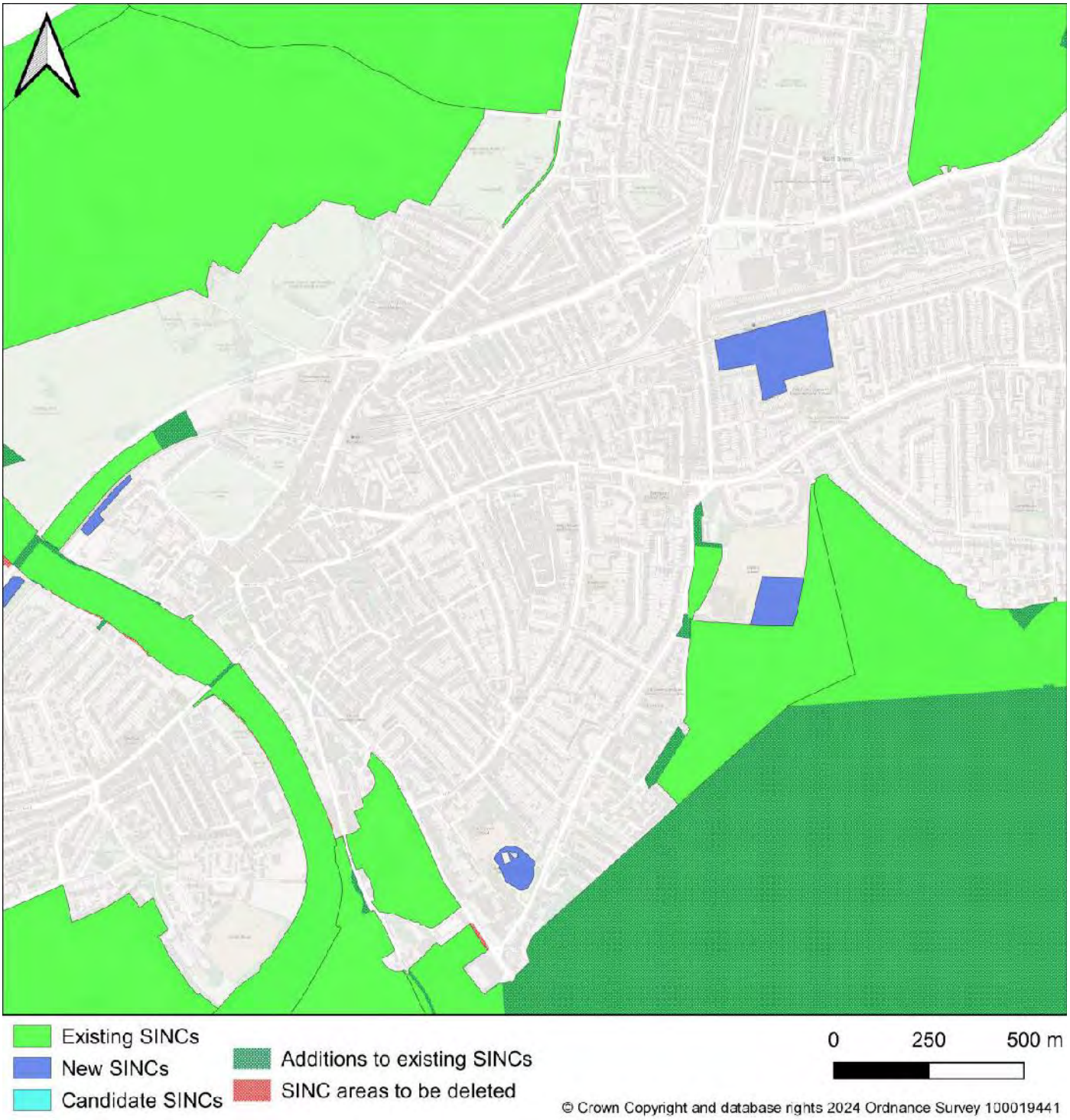
Map 28.5 Changes to existing SINCs and new SINC designations in Whitton & Heathfield areas

Map 28.6 Changes to existing SINCs and new SINC designations in Ham, Petersham & Richmond Park areas

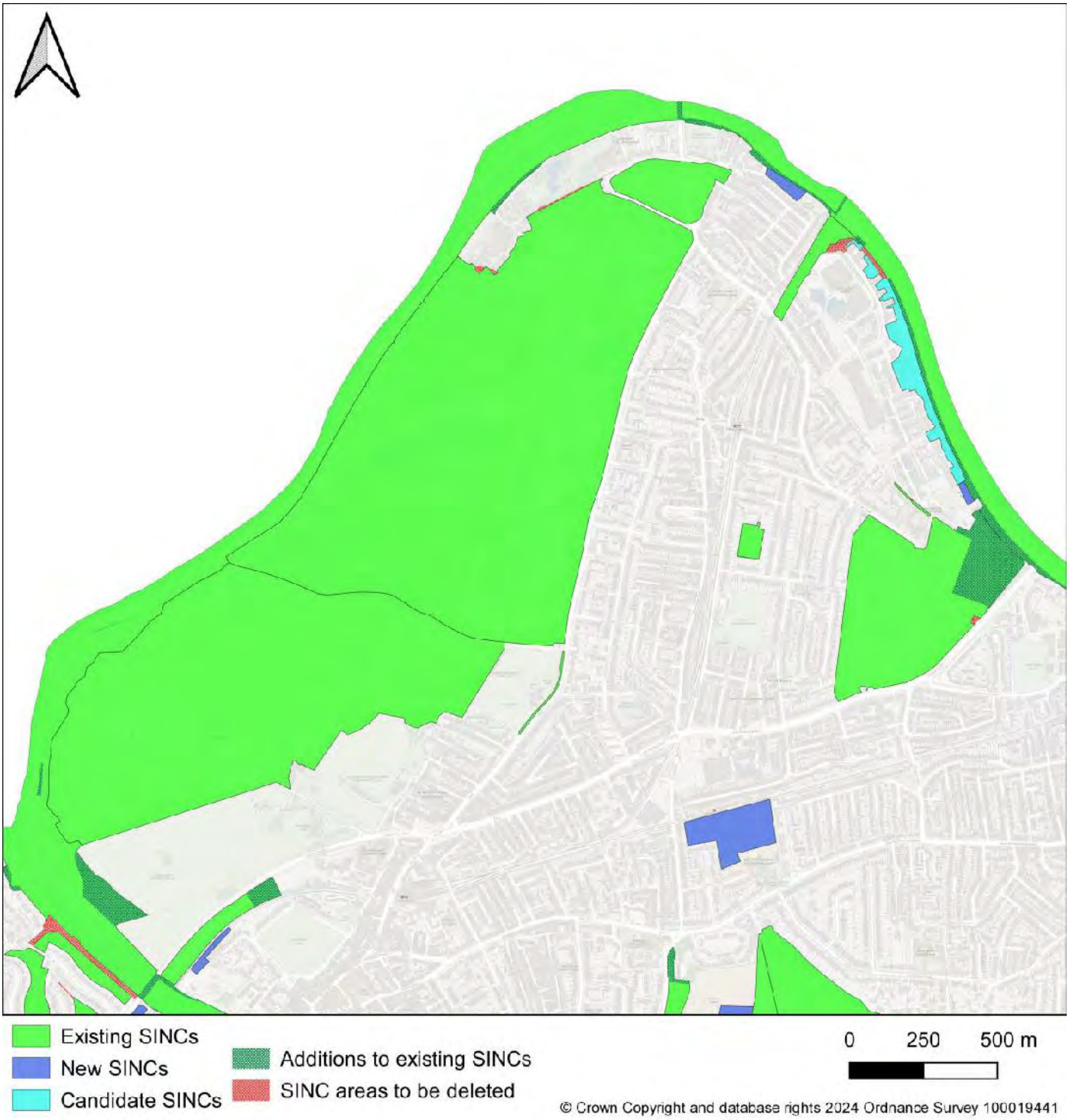


Please note that due to its Site of Special Scientific Interest (SSSI) designation, Richmond Park has historically not been displayed as an OSNI/SINC as well as SSSI on previous versions of Policies Maps. However, it has long been recognised as a SINC.

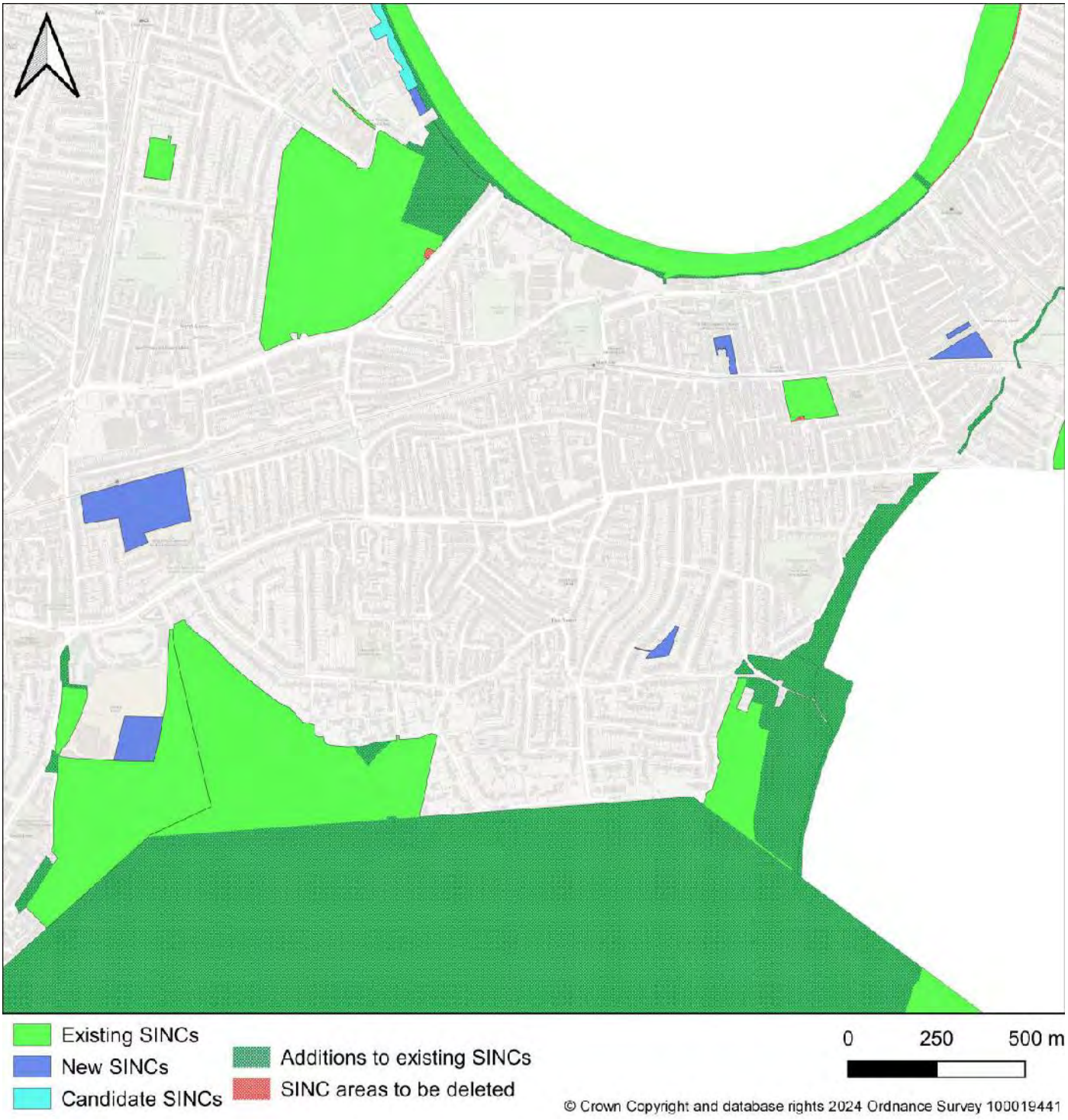
Map 28.7 Changes to existing SINCs and new SINC designations in Richmond & Richmond Hill areas



Map 28.8 Changes to existing SINCs and new SINC designations in the Kew area



Map 28.9 Changes to existing SINCs and new SINC designations in Mortlake & East Sheen areas



Map 28.10 Changes to existing SINCs and new SINC designations in Barnes area

Please note that due to its Site of Special Scientific Interest (SSSI) designation, the London Wetland Centre has historically not been displayed as an OSNI/SINC as well as SSSI on previous versions of Policies Maps. However, it has long been recognised as a SINC.

SUPERSEDED ~~Appendix 4: Review of Sites of Importance for Nature Conservation~~

~~Richmond SINCs~~

Map 28.11 Richmond SINCs

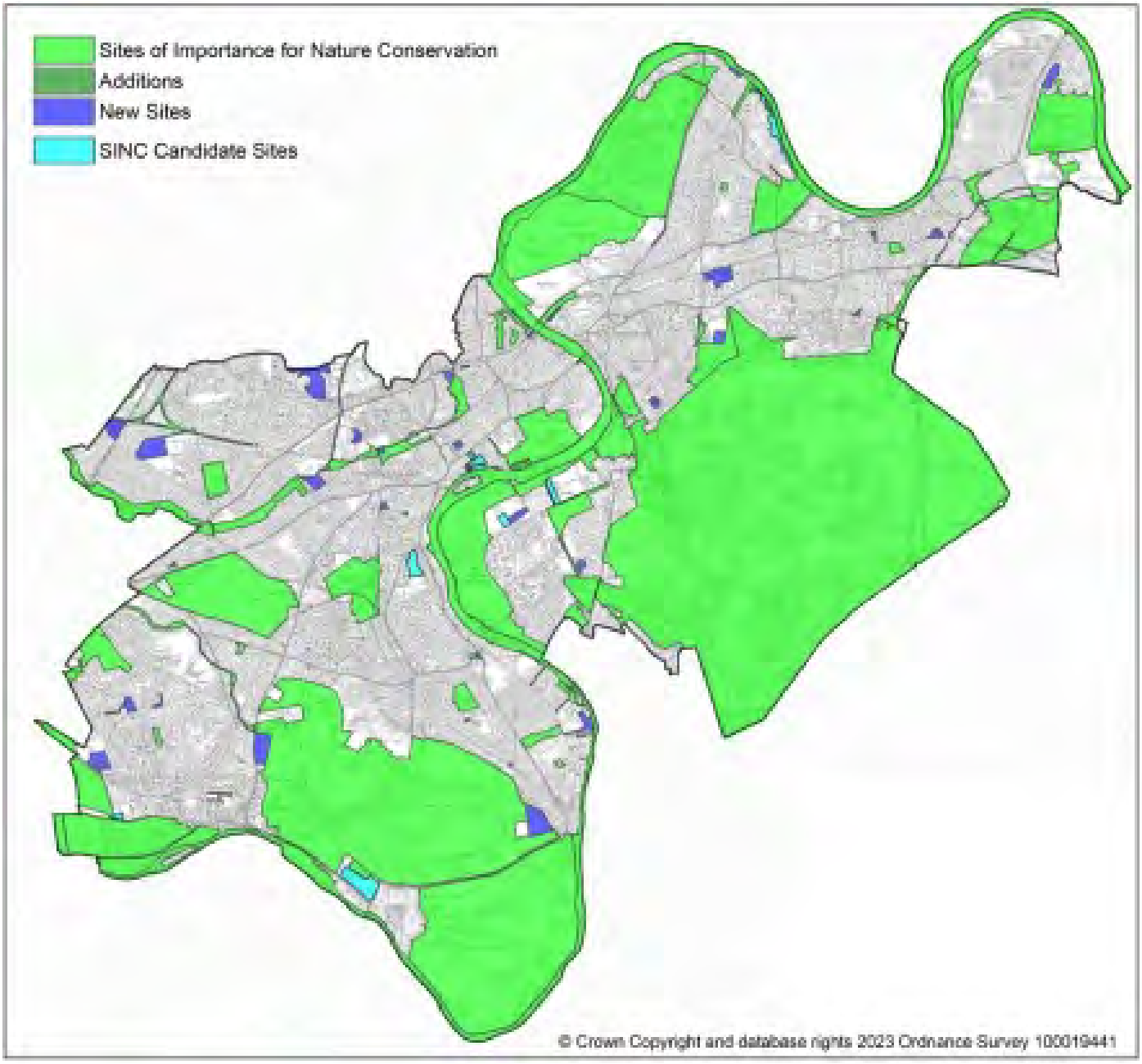


Table 28.4 Richmond SINCs

~~No.~~	~~Site Ref~~	~~Site Name~~	~~Grade~~	~~Area (Ha)~~	~~Status~~
~~1~~	~~RiB27~~	~~Cassel Hospital~~	~~Borough Grade~~	~~3.419~~	~~Upgraded~~
~~2~~	~~RiB23~~	~~Kew Pond and Kew Green~~	~~Local Grade~~	~~5.417~~	~~Upgraded~~
~~3~~	~~RiL09~~	~~Old Mortlake Burial Ground~~	~~Local Grade~~	~~1.453~~	~~Existing site~~

No.	Site Ref	Site Name	Grade	Area (Ha)	Status
4	RiL30	Kew Meadow Path	Borough Grade	0.114	Proposed to be downgraded to Local* *survey pending in 2023*
5	RiL15	Churchyard of St Mary with St Alban, Teddington	Local Grade	0.519	Existing site
6	RiB12	Barn Elms Playing Fields	Borough Grade	3.528	Existing site
7	M084	Bushy Park and Home Park	Metropolitan Grade	652.566	Existing site
8	RiB14	The Copse, Holly Hedge Field and Ham Avenues (note proposed to incorporate part of Grey Court School)	Borough Grade	11.927 (+ 0.28)	Existing site – boundary change due to addition
9	M081	Hounslow Heath	Metropolitan Grade	0.8	Existing site
10	RiB26	Terrace Field and Terrace Garden	Borough Grade	6.626	Upgraded
11	RiB22	St Margarets Residential Grounds	Borough Grade	5.301	Existing site
12	RiL25	Moormead Recreation Ground	Local Grade	4.963	Existing site
13	RiB07	Fulwell and Twickenham Golf Courses	Borough Grade	80.717	Existing site
14	RiB25	Ham Common west	Borough Grade	8.538	Upgraded
15	RiL27	Townmead Allotments, Kew	Local Grade	0.184	New Site
16	RiL03	Pensford Field	Local Grade	0.556	Existing site
17	M087	London Wetland Centre	Metropolitan Grade	42.439	Existing site
18	RiB02	Leg 'o' Mutton Reservoir LNR	Borough Grade	8.196	Existing site
19	RiL18	Beveree Wildlife Site	Local Grade	0.6	Existing site
20	RiB15	Whitton Railsides	Borough Grade	0.871	New Site
21	RiL07	Hampton Court House Grounds (this already includes the proposed RiL34 which is no longer proposed as a new site)	Local Grade	2.312	Existing site
22	M082	Richmond Park and Associated Areas	Metropolitan Grade	1082.175	Existing site
23	RiL28	The Wilderness	Local Grade	0.52	Existing site
24	RiB31	Twickenham Cemetery	Borough Grade	7.796	Upgraded
25	RiB16	Petersham Lodge Woods and Ham House Meadow	Borough Grade	8.818	Existing site
26	RiB08	Duke of Northumberland's River south of Kneller Road	Borough Grade	0.627	Existing site

No.	Site Ref	Site Name	Grade	Area (Ha)	Status
27	M031	River Thames and tidal tributaries (note proposed to incorporate Lensbury Riverside and Barn Elms Riverside)	Metropolitan Grade	2316.542 (+1.55)	Existing site – boundary change due to addition
28	RiL02	Marble Hill Park and Orleans House Gardens (note proposed to incorporate Orleans Gardens)	Local Grade	29.893 (+ 1.48)	Existing site – boundary change due to addition
29	RiL26	Garricks Lawn	Local Grade	0.305	New Site
30	RiB30	Teddington Cemetery	Borough Grade	5.513	Upgraded
31	RiL19	North Sheen and Mortlake Cemeteries	Local Grade	24.762	Existing site
32	RiL01	St James' Churchyard, Hampton Hill	Local Grade	0.722	Existing site
33	RiB09	Strawberry Hill Golf Course	Borough Grade	20.435	Existing site
34	RiB28	Trowlock Avenue riverside land, Teddington	Borough Grade	1.692	New Site* *survey pending in 2023*
35	RiB24	Portlane Brook and Meadow	Borough Grade	4.351	Upgraded
36	RiL16	Langdon Park	Local Grade	3.889	Existing site
37	MO76	Crane Corridor	Metropolitan Grade	61.763	Existing site
38	RiL17	Twickenham Road Meadow	Local Grade	2.797	Existing site
39	RiL29	St Andrews Churchyard	Local Grade	0.872	New Site
40	RiL20	Hampton Cemetery	Local Grade	1.047	Existing site
41	M154	Royal Botanic Gardens, Kew	Metropolitan Grade	123.157	Existing site
42	MO83	Ham Lands	Metropolitan Grade	76.46	Existing site
43	RiB19	Hounslow, Feltham and Whitton junctions	Borough Grade	4.654	Existing site
44	RiL06	East Sheen and Richmond Cemeteries and Pesthouse Common	Local Grade	16.663	Existing site
45	RiB06	Longford River in Richmond	Borough Grade	5.768	Existing site
46	RiB20	River Crane at St Margarets	Borough Grade	1.232	Existing site
47	RiL23	Hampton Common	Local Grade	13.209	Existing site
48	RiBl01	Royal Mid-Surrey Golf Course	Borough Grade	82.247	Existing site* *survey pending in 2023*
49	RiB13	Beverley Brook from Richmond Park to the River Thames	Borough Grade	8.845	Existing site
50	RiB32	Udney Park	Borough Grade	5.199	New Site
51	RiB04	Duke of Northumberland's River north of Kneller Road	Borough Grade	0.824	Existing site

No.	Site Ref	Site Name	Grade	Area (Ha)	Status
52	RiB17	Oak Avenue Local Nature Reserve	Borough Grade	1.809	Existing site
53	RiB29	Twickenham Junction Rough	Borough Grade	4.716	Upgraded
54	M085	Hampton Water Treatment Works and Reservoirs	Metropolitan Grade	65.664	Upgraded
55	RiB03	Hydes Field	Borough Grade	15.743	Existing site
56	RiB18	Hatherop Conservation Area	Borough Grade	4.178	Existing site
57	RiB10	Petersham Meadows	Borough Grade	14.365	Existing site
58	RiB11	Occupation Lane, Kew Embankment & Snail Reserve	Borough Grade	1.761	Existing site
59	RiL12	Barnes Green and Pond	Local Grade	3.336	Existing site
60	M086	Barnes Common	Metropolitan Grade	51.96	Existing site
61	RiB33	American University	Borough Grade	0.77	New Site
62	RiB34	Kneller Hall	Borough Grade	6.73	New Site
63	RiB35	Oak Lane Cemetery	Borough Grade	0.61	New Site
64	RiB36	Hounslow Cemetery	Borough Grade	3.06	New Site
65	RiL31	Borough Cemetery, Powdermill Lane	Local Grade	3.97	New Site
66	RiL32	Broom Road Recreation Ground	Local Grade	2.23	New Site
67	RiL33	Challenge Court open space	Local Grade	0.89	New Site
68	RiL35	Jubilee Meadow (Heathfield Nature Park)	Local Grade	2.2	New Site
69	RiL36	Nursery Green, Linear Walk & Partridge Green	Local Grade	2.11	New Site
70	RiL37	School House Lane Orchard	Local Grade	0.09	New Site
71	RiL38	St Mary Magdalen, RC Churchyard, Mortlake	Local Grade	0.32	New Site
72	RiL39	St Mary The Virgin, Church Street, Twickenham	Local Grade	0.29	New Site
73	RiB21	Orford House (former St Michaels Convent)	Borough Grade	1.82 (- 0.91)	Existing Site – boundary change to reduce site area
74	RiL40	Palewell Park Allotments	Local Grade	0.31	New Site
75	RiL41	Cavendish House Allotments	Local Grade	0.94	New Site
76	RiL42	Ham Lands, Allotments (also referred to as Walnut Tree Allotments)	Local Grade	1.36	New Site
77	RiL43	Twickenham Bridge Allotments	Local Grade	0.27	New Site
78	RiL44	Briar Road Allotments	Local Grade	1.95	New Site

No.	Site Ref	Site Name	Grade	Area (Ha)	Status
79	RiL45	Marsh Farm Allotments	Local Grade	0.37	New Site
80	RiL46	Heath Gardens Allotments	Local Grade	0.52	New Site
81	RiL47	Bushy Park Allotments	Local Grade	4.83	New Site
82	RiL48	Hatherop Road Allotments	Local Grade	3.43	New Site
83	RiL49	Barn Elms Allotments	Local Grade	2.25	New Site
84	RiL50	Royal Paddocks Allotments	Local Grade	6.02	New Site
85	RiL51	Short Lots Allotments	Local Grade	0.5	New Site
86	RiL52	Westfields Allotments	Local Grade	0.7	New Site
87	RiL53	St Anne's Passage Allotments	Local Grade	0.1	New Site
88	RiL54	Manor Road Allotments	Local Grade	4.01	New Site
89	RiL55	Old Palace Lane Allotments	Local Grade	0.36	New Site
90	RiL56	Queens Road Allotments	Local Grade	1.43	New Site
91	RiL57	Brook Road Allotments	Local Grade	0.14	New Site
92	RiL58	South Close Allotments	Local Grade	0.19	New Site

New candidate sites awaiting site survey (planned for 2023, subject to access requests)

Table 28.5 Candidate SINCs

No.	Site Name
1	Collis Primary School
2	Grotto Road Open Space
3	Ham Polo Club
4	Hampton Court Green
5	Kew Riverside (Kew Biotherm Sewage Treatment Works)
6	Riverside Drive Paddocks
7	St Mary's and Oldfield Road land
8	St Mary's University
9	York House Gardens

Existing SINCs – Changes recommended to boundaries

For further information on these changes, please see the November 2021 and November 2022 reports produced for the London Borough of Richmond on our website. Allotment sites in the borough have been added as sites of local importance due to the nature of their characteristics and their contribution to provision of mixed habitats; individual site surveys were not considered necessary to support this level of designation.

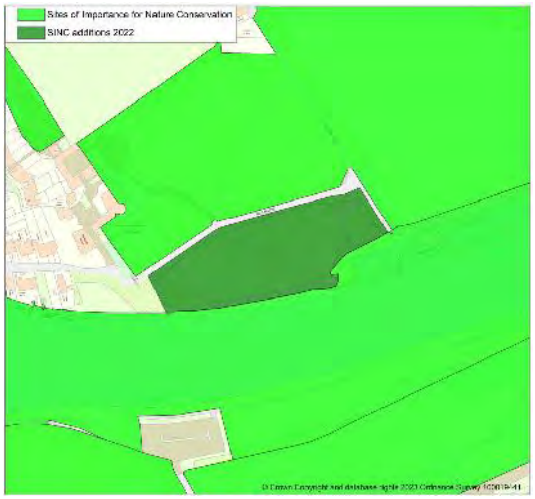
~~Existing SINCs – Changes recommended to boundaries~~

~~M031 River Thames & Tidal Tributaries Site of Metropolitan Importance (note proposed to incorporate Lensbury Riverside and Barn Elms Riverside)~~

~~RiB14 The Copse, Holly Hedge Field and Ham Avenues Site of Borough Importance (proposed to include part of Grey Court School)~~

~~RiB21 Orford House (former St Michaels Convent)~~

~~RiL02 Marble Hill Park and Orleans House Gardens Site of Local Importance (note proposed to incorporate Orleans Gardens)~~

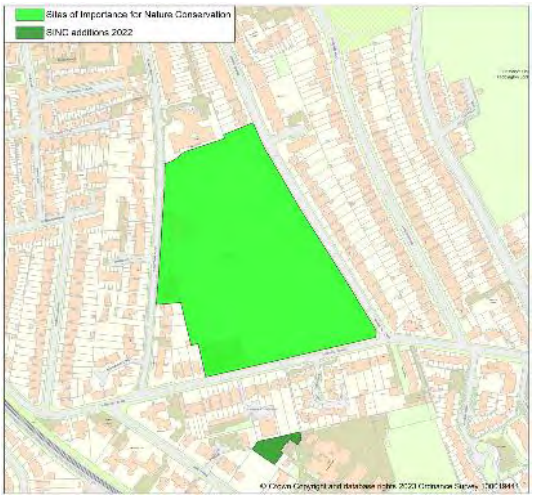


~~New sites proposed as Sites of Borough Importance~~

~~RiB15 Whitton Railsides~~

~~RiB28 Trowlock Avenue riverside land, Teddington~~

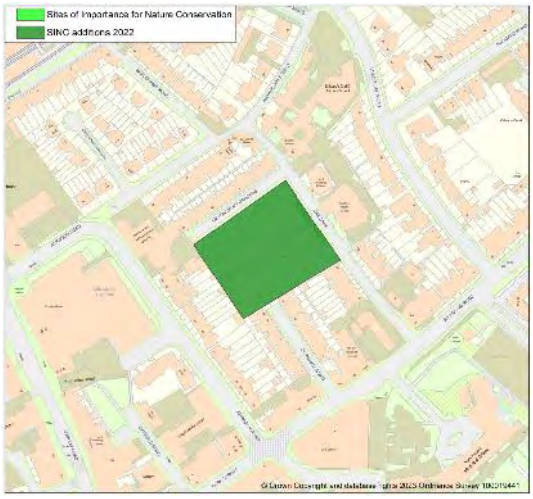
~~RiB32 Udney Park~~



~~RiB33 American University~~

~~RiB34 Kneller Hall~~

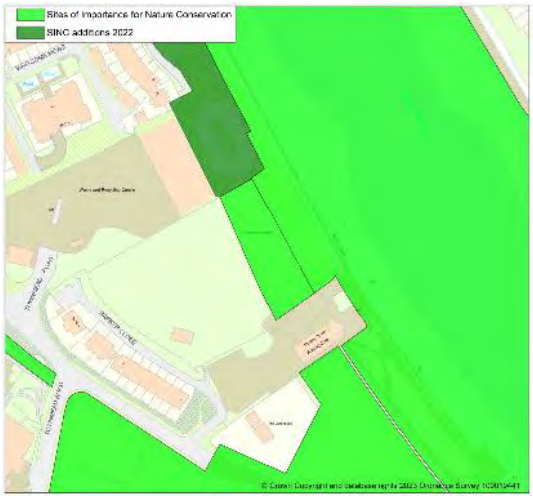
~~RiB35 Oak Lane Cemetery~~



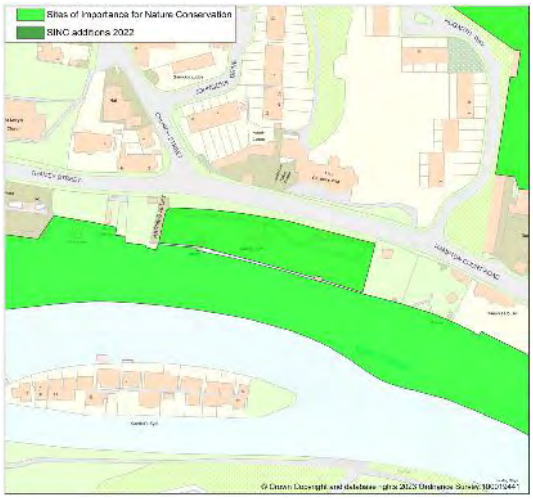
~~RiB36 Hounslow Cemetery~~

~~New sites proposed as Sites of Local Importance~~

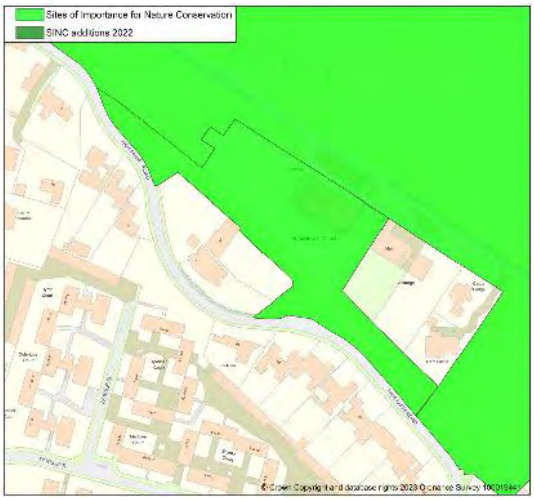
~~RiL27 Townmead Allotments, Kew~~



~~RiL26 Garricks Lawn~~



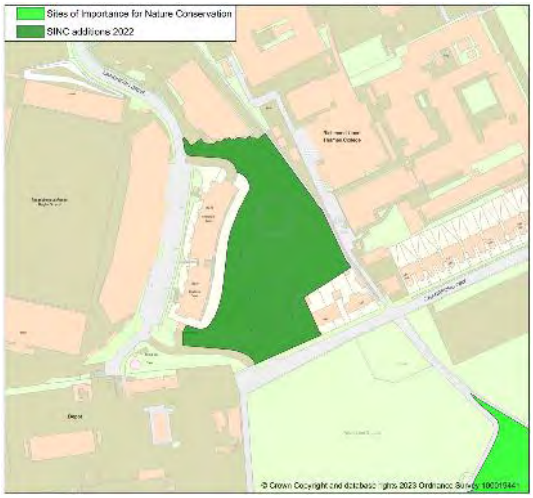
~~RiL29 St Andrews Churchyard~~



~~RiL31 Borough Cemetery, Powdermill Lane~~

~~RiL32 Broom Road Recreation Ground~~

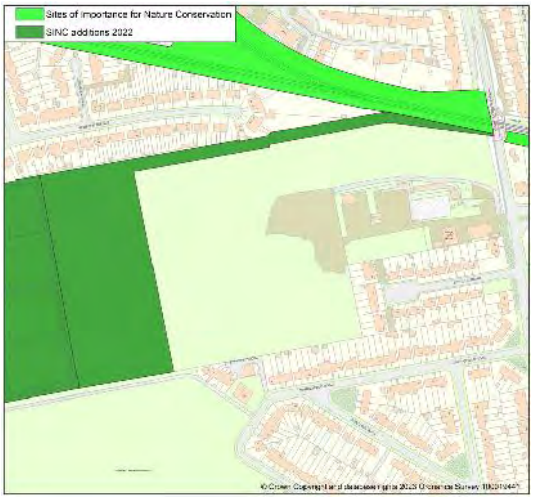
~~RiL33 Challenge Court open space~~



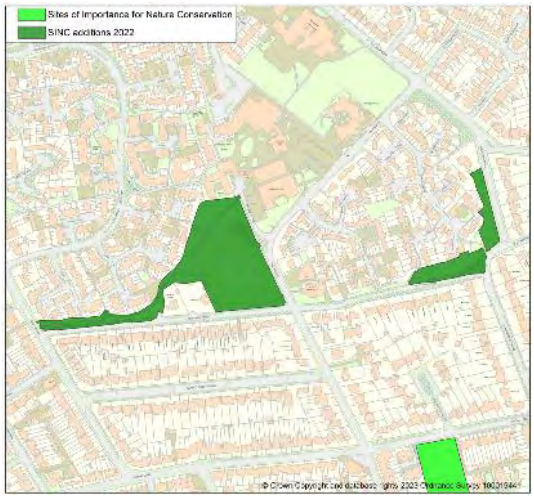
~~RiL34 Hampton Court School~~

~~*The proposed RiL34 is a duplicate of the existing SINC RiL07 (Hampton Court House Gardens), and so can be discounted as a new proposed site.*~~

~~RiL35 Jubilee Meadow (Heathfield Nature Park)~~



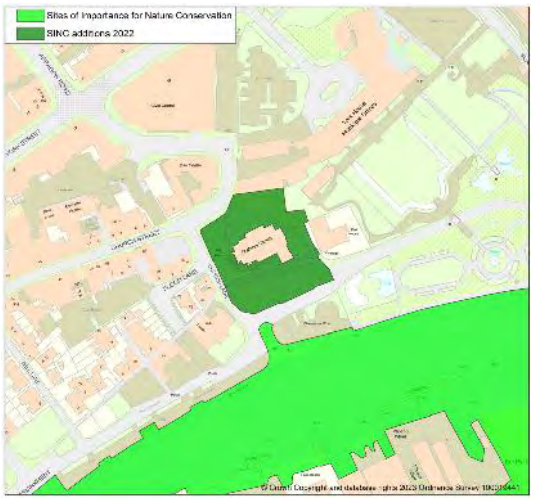
~~RiL36 Nursery Green, Linear Walk & Partridge Green~~



~~RiL37 School House Lane Orchard~~

~~RiL38 St Mary Magdalen, RC Churchyard, Mortlake~~

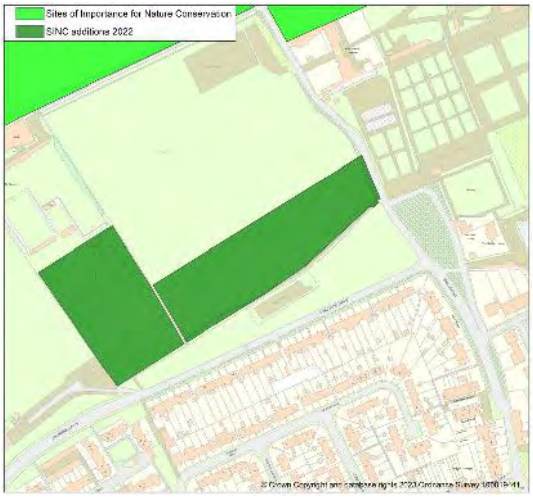
~~RiL39 St Mary the Virgin, Church Street, Twickenham~~



~~Palewell Park Allotments~~

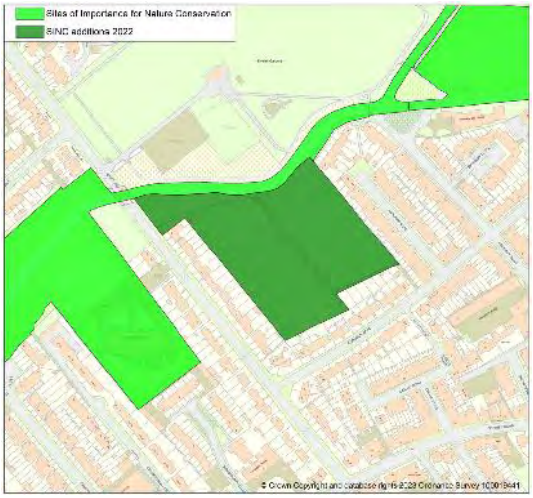
~~Cavendish House Allotments~~

~~Ham Lands, Allotments *(also referred to as Walnut Tree Allotments)*~~



~~Twickenham Bridge Allotments~~

~~Briar Road Allotments~~



~~Marsh Farm Allotments~~

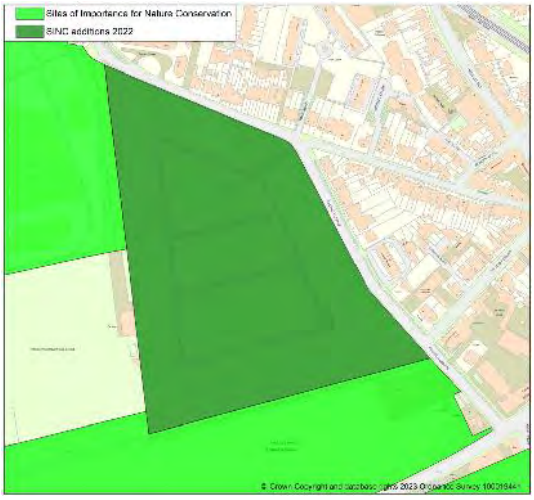
~~Heath Gardens Allotments~~

~~Bushy Park Allotments~~

~~Hatherop Road Allotments~~

~~Barn Elms Allotments~~

~~Royal Paddocks Allotments~~

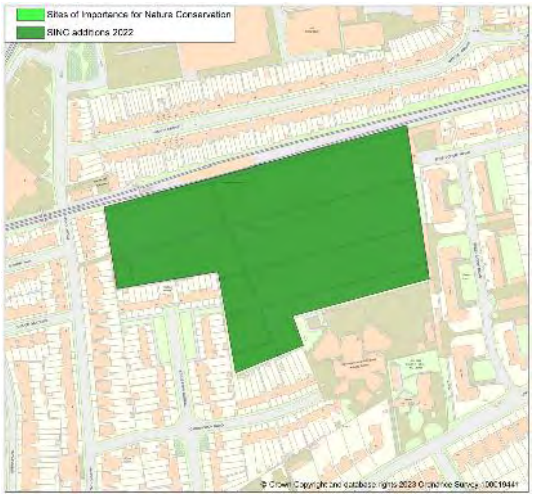


~~Short Lots Allotments~~

~~Westfields Allotments~~

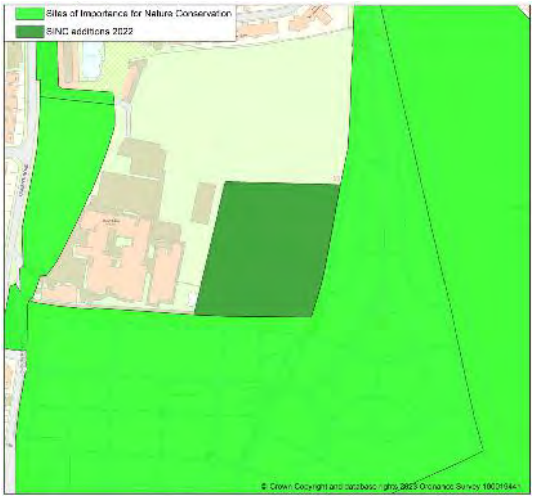
~~St Anne's Passage Allotments~~

~~Manor Road Allotments~~

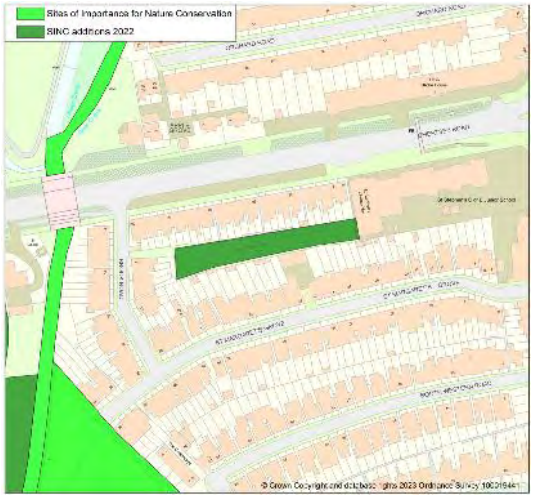


~~Old Palace Lane Allotments~~

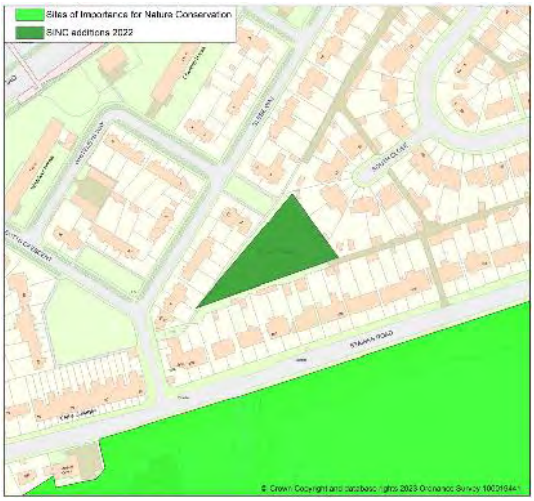
~~Queens Road Allotments~~



~~Brook Road Allotments~~

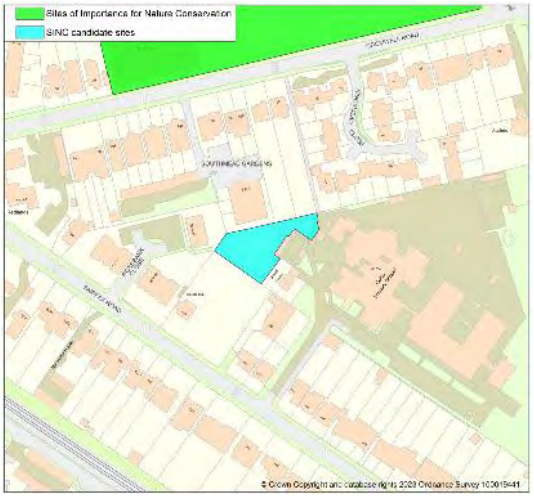


~~South Close Allotments~~



~~**Candidate Sites**~~

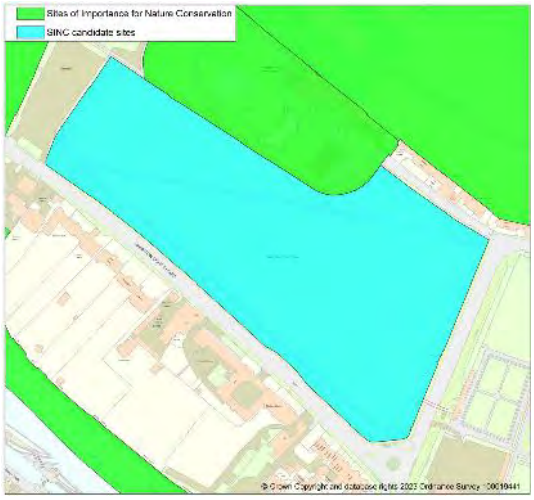
~~Collis Primary School~~



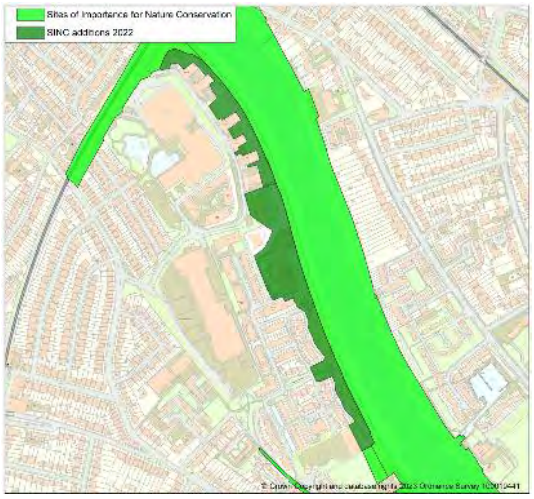
~~Grotto Road Open Space~~

~~Ham Polo Club~~

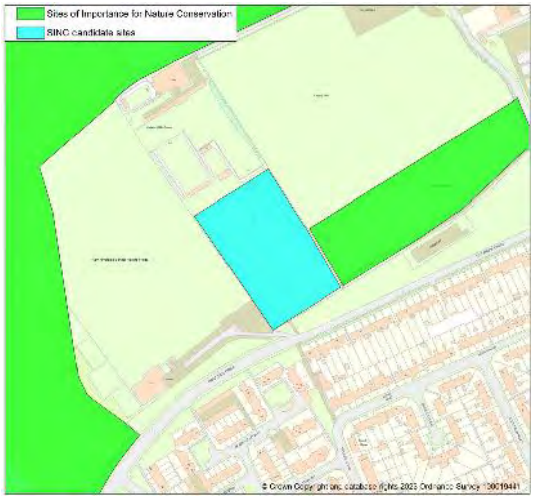
~~Hampton Court Green~~



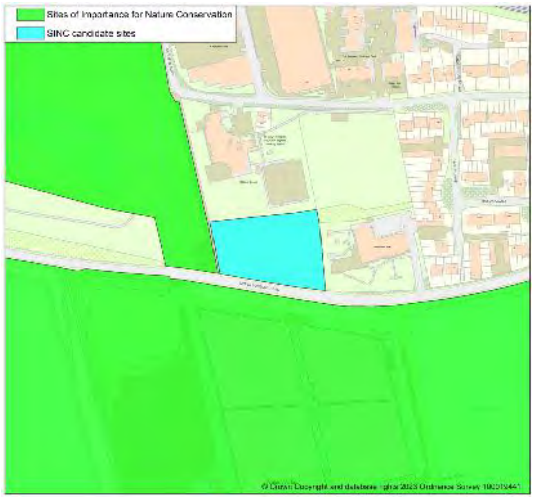
~~Kew Riverside (Kew Biotherm Sewage Treatment Works)~~



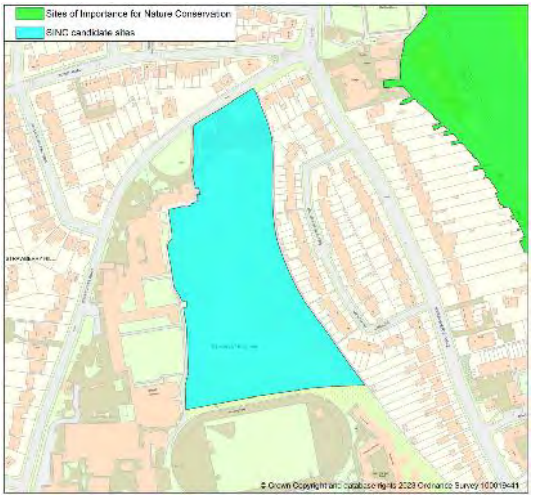
~~Riverside Drive Paddocks~~



~~St Mary's and Oldfield Road land~~



~~St Mary's University~~



~~York House Gardens~~