



London Borough of Richmond upon Thames

Local Development Framework

Twickenham Area Action Plan

Sustainability Appraisal

Adoption Statement

July 2013

London Borough of Richmond upon Thames –
Twickenham Area Action Plan

Sustainable Appraisal (SA) / Strategic Environmental Assessment (SEA)
Adoption Statement

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1 Introduction

The London Borough of Richmond upon Thames adopted its Twickenham Area Action Plan (AAP) on 2 July 2013. In accordance with Regulation 16 (3) and (4) of the Environmental Assessment of Plans and Programmes Regulations 2004, this statement of the Council summarises:

- (a) how environmental considerations have been integrated into the Twickenham AAP;
- (b) how the environmental report has been taken into account;
- (c) how opinions expressed in relation to the consultation on the Sustainability Appraisals / environmental reports have been taken into account;
- (d) how the results of any consultations have been taken into account;
- (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the Twickenham AAP.

2 How environmental considerations have been integrated into the Twickenham Area Action Plan

The Twickenham Area Action Plan (AAP) forms part of the Local Plan (previously referred to as Local Development Framework, LDF) and sets out the overall strategy for the future of Twickenham town centre. The Plan covers the period up to 2027 and is vital to the promotion of a prosperous local economy and investment.

The Sustainability Appraisal (SA) incorporates the requirements of the SEA Directive but broadens them to include social, economic and environmental effects in order to ensure that decisions are made that accord with sustainable development principles. Throughout this statement, reference to SA encompasses the requirements of a merged SA/SEA. Full details of the SA process are set out in the Final SA Report submitted with the AAP (Publication version, July 2012; including amendments made in October and November 2012 as well as in February 2013).

The key criteria against which the policies and proposals of the AAP have been appraised are contained in the SA framework. The SA framework was originally set out in the Scoping Report, which has been reviewed several times since its first publication in June 2005 to reflect new/emerging policies, programmes, legislative changes and updated background data. The SA framework, which was used to inform the preparation of the Core Strategy, was first reviewed in March 2007. In addition, with the commencement of the Development Management Plan (DMP), the Council considered that the objectives set out in the March 2007 Scoping Report remained relevant to the DMP. The last review of the SA framework took place in May 2011 for the purpose of developing the Twickenham AAP. The latest version of the SA Scoping Report can be found on the [Council's website](http://www.richmond.gov.uk/sustainability_appraisal_ldf): http://www.richmond.gov.uk/sustainability_appraisal_ldf.

An essential part of the preparation process of the AAP has been to undertake SA to ensure the integration of social, environmental and economic considerations into the development of the policies and proposals for sites within the Twickenham AAP boundary; this has been carried out for each key stage of the AAP production including: issues & options, pre-publication, publication and submission stages.

In addition, the Council proposed a number of changes before the Examination Hearings of the AAP. These changes were prompted by a number of national and regional policy

changes and representations received on the submitted AAP. Some further changes to the Plan were required by the Inspector during the Examination in order to make the plan sound (see the Inspector's report for the Main Modifications to the Plan); these required public consultation and were fully informed by Sustainability Appraisal. Therefore, an Addendum Report to the Sustainability Appraisal as a result of the proposed Main Modifications was produced in February 2013, which replaced parts of the Sustainability Appraisal Publication Version, July 2012; parts of the revised Sustainability Appraisal published in October 2012; and the revised Sustainability Appraisal for TW2 Station Yard published in November 2012. Further information can be found via the following links:

- [Twickenham AAP Examination in Public:](http://www.richmond.gov.uk/examination_in_public.htm)
http://www.richmond.gov.uk/examination_in_public.htm
- [Twickenham AAP proposed main modifications:](http://www.richmond.gov.uk/proposed_main_modifications.htm)
http://www.richmond.gov.uk/proposed_main_modifications.htm

The Inspector found that with the changes proposed the AAP met the criteria for soundness and concluded in her final report to the Council that the “SA has been carried out and is adequate”.

3 How the environmental report has been taken into account

At each stage of the development of the AAP, the findings of the SA were taken into account to inform the development of policies and site-specific proposals. Each policy and proposal site option was assessed in terms of its overall balance of impacts on the SA objectives.

The development and appraisal of the proposals and policies contained within the final Plan was an iterative process. This process started with appraising the options and scenarios, which were fully informed by Sustainability Appraisal (see SA Progress Report, June 2011). The options and scenarios were then refined to take account of the appraisal and consultation process. The pre-publication AAP and accompanying SA progress report were publicly consulted on from December 2011 to February 2012. Following the SA of the pre-publication version of the AAP, changes have been made as a result of the SA. This was followed by a final public consultation from 6 July until 31 August 2012 on the Publication version of the Twickenham Area Action Plan (AAP), including on the accompanying Sustainability Appraisal Report, prior to the Plan being formally submitted to the Secretary of State in October 2012. The Council proposed some further changes following the submission of the Plan, which were all subject to Sustainability Appraisal. In addition, the Inspector proposed some modifications to the Plan, which were also subject to consultation and Sustainability Appraisal.

The final assessment matrices of the chosen policy options and proposals for sites are set out in the following documents:

- [Sustainability Appraisal report for the Publication version of the AAP](http://www.richmond.gov.uk/sustainability_appraisal_publication_twickenham_aap.pdf) (July 2012):
http://www.richmond.gov.uk/sustainability_appraisal_publication_twickenham_aap.pdf
- [Revised SA for Former Sorting Office, Station Yard, York House and Twickenham riverside](http://www.richmond.gov.uk/taap_submission_revised_sa_replacement_pages_17_october_2012.pdf) (17 October 2010):
http://www.richmond.gov.uk/taap_submission_revised_sa_replacement_pages_17_october_2012.pdf
- [Revised SA report for TW2 Station Yard](http://www.richmond.gov.uk/sa_station_yard.pdf) (November 2012):
http://www.richmond.gov.uk/sa_station_yard.pdf
- [SA addendum report for proposed Main Modifications](http://www.richmond.gov.uk/addendum_to_sustainability_appraisal_february_2013.pdf) (February 2013):
http://www.richmond.gov.uk/addendum_to_sustainability_appraisal_february_2013.pdf

To summarise the final Sustainability Appraisal assessment, the Plan is likely to have overall positive sustainability impacts, particularly in relation to social and economic objectives, but also some potentially negative impacts on the environment (transport, pollution, biodiversity, and waste) unless mitigation measures are taken. Any improvements to the pedestrian environment such as better pedestrian links, crossing and shared surfaces are considered to result in positive impacts. Any potentially negative impacts in relation to new development, such as an increase in traffic, waste, pollution and potential impacts on the environment can be mitigated when considering detailed options for the redevelopment of sites in the town centre. New developments in particular may increase the need for travel; however, the overall strategy is to reduce the dominance of traffic in the town, which will result in positive impacts for pedestrians, but there could potentially be an increase in air and noise pollution as well as an increase in traffic and congestion in the wider area. It should be noted that since the pre-publication version of the Plan, more emphasis has been given to green infrastructure and in particular the creation of a new walk/cycle route along the River Crane corridor, including linkages with the town centre, which will have positive benefits for the community and environment, and may also encourage more sustainable modes of transport. Redevelopment of existing sites also provides the opportunity for more energy efficient buildings as well as sustainable energy use such as renewable technologies and decentralised energy networks. The enhanced use of heritage assets along the Thames, in particular York House and its Gardens, needs to be carefully managed in order to mitigate any potential adverse impacts and to ensure opportunities and benefits are extended to the assets and the wider river landscape.

4 How opinions expressed through public consultation have been taken into account

Consultations throughout the SA process have been undertaken in accordance with Article 6 (3) of the SEA Directive, the SEA regulations and LB Richmond upon Thames's Statement of Community Involvement (2005; incl. addendum in 2009). There are three key bodies that must be consulted: the Environment Agency (EA), English Heritage (EH) and Natural England (NE). The guidance also states that it is desirable to consult other bodies with social and economic responsibilities as the Council deems appropriate.

Formal consultation on the SA Scoping Report and subsequent SA reports was carried out with the environmental consultation bodies, community groups, social and economic bodies at each stage of the AAP. In particular comments from the statutory bodies helped shape the SA and inform policy development and proposals for specific sites. These bodies, stakeholders and also the public were able to comment on the SA accompanying the documents. The table below provides a summary of the consultations at each stage of the SA and AAP process.

4.1. Summary of consultation stages and Sustainability Appraisal (SA)

Date	Plan -making Stage	SA Document	Details
2010 and early 2011	Evidence gathering and Issues	SA Scoping Report	Commencement of the Twickenham AAP through consultation on the scope and content of a draft SA Scoping Report for the Twickenham AAP (February 2011) with the relevant statutory bodies, key stakeholders and the public. The consultation was carried out from 18 February to 1 April 2011. Following the consideration of all the submitted responses, a revised SA Scoping Report was published (May 2011).

Date	Plan -making Stage	SA Document	Details
10 June to 22 July 2011	Options consultation	SA Progress Report, June 2011	Public and stakeholder consultation was carried out in the summer 2011 on the AAP following the issues analysis. This included a consultation on the SA Progress Report. The options took into account the results of the earlier consultations, local evidence studies and SA Scoping Report.
16 December 2011 to 10 February 2012	Pre-publication consultation	SA Report of the pre-publication version of the AAP, November 2011	Consultation on the pre-publication version of the AAP, supported by the SA report, after consideration of comments made at the Options stage. The SA report assessed and outlined the potential positive and negative impacts of the policies and proposals, including all other reasonably policy/proposal alternatives.
6 July to 31 August 2012	Publication Consultation	Sustainability Appraisal Report (Publication Version), July 2012	The AAP has been informed by a comprehensive SA process to ensure the Plan is in line with the Government's objectives on sustainable development. The SA report demonstrated that the social, environmental and economic impacts of the AAP have been assessed. This was the final public consultation stage prior to submitting the Plan, which enabled representations to be made based on the document's "soundness" and legal compliance.
5 October 2012	Submission of AAP, including SA report, to the Secretary of State	Sustainability Appraisal Report (Publication Version), July 2012, including SA amendment report, October 2012	Submission of statement of consultation (Regulation 28 Statement). In addition to the original SA report, a revised SA (dated 17 October 2012) was submitted for: 1) Former Sorting Office and Open Land South of River Crane 2) Station Yard 3) York House, York House Gardens, Civic Centre and environs 4) Twickenham riverside (Former Pool Site) and south of King Street, including approaches
23 November 2012 to 7 January 2013	Further proposed changes consultation	Revised Sustainability Appraisal for TW2 Station Yard, November 2012	Twickenham AAP Further Proposed Changes consultation in relation to Station Yard consultation; this included the production of a revised Sustainability Appraisal for TW2 – Station Yard, which replaced the relevant pages of the TW2 proposal site of the July 2012 Publication SA report and the subsequent revisions made to the SA in October 2012

Date	Plan -making Stage	SA Document	Details
12 and 19 February 2013	Examination in Public of the AAP	The final SA of the Plan consists of the main SA report including amendments	Examination in Public: an independent Inspector considered the “soundness” of the AAP. The final SA consists of the following: <ul style="list-style-type: none"> • SA Publication Version, July 2012; • SA Amendment, October 2012 • Revised SA for TW2 Station Yard, November 2012 • SA Addendum Report, February 2013
28 May 2013	Inspector’s report received	Inspector’s conclusion: “SA has been carried out and is adequate”.	The Inspector’s overall conclusion is that the AAP is sound.
2 July 2013	Adoption	SA Adoption Statement	This report/statement.

At each stage of the AAP process, the comments received and actions taken have been recorded and have been made available to the public. All of the consultation was in conformity with the Council’s Statement of Community Involvement (SCI), adopted in June 2006 (amended in April 2009).

Full details on the comprehensive consultation processes of each stage of the AAP up to submission, including how responses were taken into account, can be found in the [Regulation 28 Statement of Consultation](#) (October 2012); this also includes the schedule of responses following the publication consultation:

http://www.richmond.gov.uk/009_statement_of_consultation_regulation_28_statement_-_october_2012_op.pdf

Below is a summary of the key points of the consultations undertaken at each stage of the AAP process:

4.2 Issues consultation and evidence gathering

Early consultation with the community and stakeholders identified a number of issues for Twickenham town centre and what the AAP needs to address. This was an ongoing process that started with the Twickenham issues workshop in September 2009, continued with the [Barefoot Consultation](#): http://www.richmond.gov.uk/twickenham_barefoot_consultation.htm in July 2010, the [Twickenham Conference](#): http://www.richmond.gov.uk/twickenham_conference.htm in October 2010, the [All in One householder survey](#): http://www.richmond.gov.uk/all_in_one.htm undertaken in November/December 2010 and the [All in One business survey](#): http://www.richmond.gov.uk/business_survey_2011.htm undertaken in January/February 2011.

The Twickenham AAP commenced with a review of the existing Scoping Report, which set out the findings of the first stage of the SA process and described what happens next in the process. The SA framework for the Richmond Local Plan, which was first used to inform the preparation of the Core Strategy, was reviewed in March 2007 as well as for the commencement of the Development Management Plan (DMP) in 2009. The three statutory consultation bodies (English Heritage, Natural England and Environment Agency) were consulted on the updated Scoping Report and invited to comment on it from 18 February to 1

April 2011. In addition, the Council also consulted other bodies with environmental, social and economic responsibilities to ensure a wider engagement on the SA framework. Specific consultation questions were included within the SA Scoping Report and on a separate form to assist consultees with their responses. In total, the Council received 7 responses on the Scoping Report, including from the three statutory bodies, all of which have been taken into account, and a [Revised SA Scoping Report for the Twickenham AAP](http://www.richmond.gov.uk/revised_twickenham_sa_scoping_report_may_2011.pdf) was published in May 2011: http://www.richmond.gov.uk/revised_twickenham_sa_scoping_report_may_2011.pdf.

4.3 Options consultation

Public consultation on the options and scenarios took place for a six week period from Friday 10 June to Friday 22 July 2011. This consultation was in conformity with the Borough's adopted Statement of Community Involvement (2006, amended in 2009).

In addition to the formal 6 week consultation period, the Options consultation also included a series of events and meetings over a few weeks. The main consultation document consisted of a consultation leaflet, setting out the vision, objectives and strategic options and scenarios. This was accompanied by a Sustainability Appraisal Report, which assessed the environmental, social and economic impacts of the options and scenarios. See the [Twickenham AAP Options consultation](http://www.richmond.gov.uk/twickenham_area_action_plan_issues_options_consultation.htm) page for further information: http://www.richmond.gov.uk/twickenham_area_action_plan_issues_options_consultation.htm

Whilst many of the responses were in the form of questionnaires received (in total 344 questionnaire responses), the results of general and specific meetings were recorded and taken into account, together with initial feasibility work, in the final analysis. In addition, 16 stakeholders submitted their responses in the form of letters rather than questionnaires. Whilst many of the responses were in the form of questionnaires, the results of general and specific meetings were recorded and taken into account, together with initial feasibility work, in the final analysis. The results of the options consultation can be viewed in a [Summary of all consultation on the options stage](http://www.richmond.gov.uk/summary_of_options_consultation_report.pdf): http://www.richmond.gov.uk/summary_of_options_consultation_report.pdf, or in the [Full report of options consultation](http://www.richmond.gov.uk/final_full_report_of_all_consultation_on_options_stage.pdf): http://www.richmond.gov.uk/final_full_report_of_all_consultation_on_options_stage.pdf.

4.4 Pre-publication consultation

The comments made during the consultation on both the options and scenarios for the AAP as well as on the Sustainability Appraisal report, in conjunction with other research and feasibility, determined the way forward. The Pre-publication version of the AAP was prepared and fully informed by the Sustainability Appraisal. The proposals and policies of the Twickenham AAP were publicly consulted on from 16 December 2011 until 10 February 2012. Further information, including the SA report and consultation responses, are available on the [Pre-Publication AAP webpage](http://www.richmond.gov.uk/twickenham_area_action_plan_pre-publication.htm): http://www.richmond.gov.uk/twickenham_area_action_plan_pre-publication.htm

Following the SA of the pre-publication version of the AAP, changes have been made as a result of the SA. This includes more emphasis on heritage assets and their settings in the wider context, enhancement of biodiversity and green infrastructure. The addition of the walk/cycle way along the River Crane as part of the green infrastructure, including linkages with the town centre, has positive benefits for the community and environment, and encourages sustainable modes of transport. The previous SA also identified some potential negative sustainability impacts as a result of some of the measures proposed under transport, such as the possible removal of some bus lanes and changes to cycle provision. These details have been removed from the AAP and have been covered within a detailed traffic scheme for the town centre, which was put forward for public consultation in 2012 at

the same time as the Publication consultation of the AAP. The detailed traffic scheme was subject to SEA, modelling and discussion with Transport for London to optimise positive and minimise negative impacts. Measures were put forward to reduce and/or minimise any possible negative impacts of some of the proposals and these were adjusted accordingly in the final version of the Plan (Publication Twickenham AAP).

4.5 Publication consultation

There was a final 8 week public consultation from 6 July until 31 August 2012 on the Publication version of the Twickenham Area Action Plan (AAP), including on the accompanying Sustainability Appraisal Report, which took account of the comments made during the pre-publication consultation (also see above). The publication stage of the AAP enabled representations to be made based on the Plan's 'legal compliance' and 'soundness' before it was submitted to the Secretary of State for independent examination by a planning inspector.

The Sustainability Appraisal report for the Publication version of the AAP can be found on the [Council's website](#):

http://www.richmond.gov.uk/sustainability_appraisal_publication_twickenham_aap.pdf

Responses could be made and submitted by completing a questionnaire (either online, electronic or in hard copy). The questionnaire required respondents to comment on specific sections of the Plan and to suggest alternative wording where appropriate. In total, there were 153 responses on the Publication version of AAP, which came from a total of 36 respondents.

The next stage was to submit the AAP to the Secretary of State for examination by an independent Planning Inspector on Friday 5 October 2012. The submission included:

- The Publication documents (including the Sustainability Appraisal report)
- The comments received during the Publication Consultation
- Minor changes proposed by the Council before submission in response to the comments received during the Publication Consultation

In addition, a number of supporting documents were also submitted. These included the comments received during all previous consultations and other evidence base studies and documents. All submission documents can be viewed on the [Council's AAP Submission website](#): http://www.richmond.gov.uk/twickenham_area_action_plan_submission.htm

It should also be noted that as a result of the Council's proposed pre-submission changes, a revised Sustainability Appraisal was produced and published on 17 October 2012 for the following areas, which replaced the relevant parts of the July 2012 Sustainability Appraisal:

- 1) Former Sorting Office and Open Land South of River Crane
- 2) Station Yard
- 3) York House, York House Gardens, Civic Centre and environs
- 4) Twickenham riverside (Former Pool Site) and south of King Street, including approaches

4.6 Further proposed changes consultation

Following submission, the Council consulted from 23 November 2012 to 7 January 2013 on two further changes, which altered Proposal TW2 (Station Yard) from a 3-4 storey car park to a mixed development of 3-4 storeys to include multi-storey parking and residential uses.

This consultation was also informed by and accompanied with a revised Sustainability Appraisal, which replaced some pages of the existing July 2012 SA Report of the Publication Version and the subsequent revisions made to the SA in October 2012.

The Revised Sustainability Appraisal TW2 – Station Yard (residential development, increased public car parking and landscaping) can be found on the [Council's website](http://www.richmond.gov.uk/sa_station_yard.pdf):
http://www.richmond.gov.uk/sa_station_yard.pdf

The responses received on the further proposed changes consultation can also be viewed on the [Council's website](http://www.richmond.gov.uk/responses_to_further_proposed_changes_to_station_yard_consultation.pdf):
http://www.richmond.gov.uk/responses_to_further_proposed_changes_to_station_yard_consultation.pdf

4.7 Examination

Following submission of the Plan and accompanying documents to the Secretary of State on 5 October 2012, the Examination Hearing Sessions took place on 12 and 19 February. The independent Planning Inspector, Wendy Burden, proposed a list of Main Modifications to the Plan, which were publicly consulted on from 6 March to 17 April 2013. These proposed Main Modifications have been subject to Sustainability Appraisal and an Addendum report to the Sustainability Appraisal has been produced. The main modifications including the SA report in relation to these modifications can be viewed on the [Council's website](http://www.richmond.gov.uk/proposed_main_modifications.htm):
http://www.richmond.gov.uk/proposed_main_modifications.htm

The Addendum considered the potential sustainability implications of each of the proposed main modifications, and presents an assessment of any potential sustainability implications which arise.

The Council received the Inspector's report into the AAP on 28 May 2013 and the Inspector's overall conclusion is that the AAP is sound. The Inspector also concluded in her final report to the Council that the "SA has been carried out and is adequate".

5 The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with

The final version of the AAP, including all its chosen options/policies and proposals, were examined against the national and regional policy framework, the community plan and other local policies, including the required consultation procedures and the requirements of SA/SEA. The following documents demonstrate that all reasonable options and alternatives were generated, appraised, selected or rejected and the role that Sustainability Appraisal and community engagement have played in this process:

- The Twickenham AAP [Regulation 28 Statement of Consultation](http://www.richmond.gov.uk/009_statement_of_consultation_regulation_28_statement_-_october_2012_op.pdf), including the schedule of responses following the publication consultation (October 2012):
http://www.richmond.gov.uk/009_statement_of_consultation_regulation_28_statement_-_october_2012_op.pdf
- [SA report for the Publication version of the AAP](http://www.richmond.gov.uk/sustainability_appraisal_publication_twickenham_aap.pdf) (July 2012):
http://www.richmond.gov.uk/sustainability_appraisal_publication_twickenham_aap.pdf
- [Revised SA for Former Sorting Office, Station Yard, York House and Twickenham riverside](http://www.richmond.gov.uk/taap_submission_revised_sa_replacement_pages_17_october_2012.pdf) (17 October 2010):
http://www.richmond.gov.uk/taap_submission_revised_sa_replacement_pages_17_october_2012.pdf
- [Revised SA report for TW2 Station Yard](http://www.richmond.gov.uk/sa_station_yard.pdf) (November 2012):
http://www.richmond.gov.uk/sa_station_yard.pdf
- [SA addendum report for proposed Main Modifications](http://www.richmond.gov.uk/addendum_to_sustainability_appraisal_february_2013.pdf) (February 2013):
http://www.richmond.gov.uk/addendum_to_sustainability_appraisal_february_2013.pdf

The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan

Monitoring indicators and targets have been identified for each of the policies as set out in the AAP. The information monitored will be published in the Authority's Monitoring Report (AMR) as required by current and future planning regulations. The AAP policies and proposals will be reviewed in the light of the results of monitoring and any other significant changes in circumstances.

The success and effectiveness of the SA/SEA process will be monitored by the continued collection of baseline data according to identified indicators. These indicators and their relevant targets are set out in the AMR. The indicators monitor the significant effects of the Plan and identify remedial action required if the trends or targets are not met.

The latest version of the SA objectives is set out in Appendix 1. Note that the Council is currently in the early stages of preparing its next Plan – the Site Allocations Plan. As part of this, the SA Scoping Report will be reviewed and updated. There is therefore a possibility that the SA objectives may change.

The overall proposed SA monitoring framework, which now reports on the adopted Core Strategy, Development Management Plan and Twickenham Area Action Plan is included in Appendix 2 of this Statement; the results of the monitoring will be reported in the AMR.

6 Further information

The Sustainability Appraisal of the Twickenham Area Action Plan and other related documents are available on the [Council's website](http://www.richmond.gov.uk/sustainability_appraisal_ldf.htm):
http://www.richmond.gov.uk/sustainability_appraisal_ldf.htm

Appendix 1 – SA Objectives

Table 3: SA objectives for the Twickenham Area Action Plan

		Env	Econ	Soc
E N V I R O N M E N T A L	1) To promote sustainable waste management, including prevention, reducing waste and waste disposal, preparing for reuse, recycling and recovery before disposal.	✓		
	2) To make the most efficient use of land, remediate and reuse contaminated land and safeguard soil quantity and quality.	✓		
	3) Reduce air and noise pollution, including reducing emissions of greenhouse gases, and ensure air quality improves.	✓		
	4) Minimise congestion and pollution by reducing the need to travel, encourage alternatives to the car and making best use of existing transport infrastructure.	✓		✓
	5) To maintain groundwater and surface water quality, conserve water and reduce the risk of flooding.	✓		✓
	6) To promote sustainable energy use through reducing energy use by maximising energy efficiency, use of zero- and low carbon technologies and reduce carbon dioxide emissions through the increased use of renewable energy.	✓		
	7) Conserve and enhance biodiversity, avoiding irreversible losses, through responsible management of all wildlife sites and species, and through the enhancement of wildlife corridors.	✓		
	8) Promote high quality places, spaces and buildings and conserve and enhance the borough's landscape and townscape character and its heritage assets.	✓	✓	✓
	9) To make best use of previously developed land and existing buildings, encouraging sustainable construction practices.	✓		
S O C I A L	10) To provide new housing opportunities and sufficient affordable housing that meets local needs.		✓	✓
	11) To create and maintain safer and more secure communities.	✓	✓	✓
	12) To facilitate the improved health and well being of the population, including enabling people to stay independent and ensuring access to those health, education, environment, sport, leisure and recreation facilities and services that are required.		✓	✓
E C O N O M I C	13) To increase the vitality and viability of existing town centres, local centres and parades.		✓	✓
	14) To promote and encourage a buoyant and diverse economy that will provide sustainable economic growth.		✓	✓
	15) Provide appropriate commercial development and training opportunities to meet the needs of the local and sub-regional economy.		✓	✓

Appendix 2 – SA Monitoring Framework

SA Objective	Monitoring indicator	Monitored by	Timeframe	Comments
1) To promote sustainable waste management, including prevention, reducing waste and waste disposal, preparing for reuse, recycling and recovery before disposal.	Capacity of new waste management facilities by type	www.capitalwastefacts.com and any Reporting by (LBRuT) Street Scene performance	3 year programme	Data will be reported elsewhere (WLWP) and therefore need to be reported only every 3 years.
	Quantity of household waste arising, and managed, by management type	Reporting by (LBRuT) Street Scene performance	3 year programme	Data will be reported elsewhere (WLWP) and therefore need to be reported only every 3 years.
	Quantity of household waste reused, recycled and composted	Reporting by (LBRuT) Street Scene performance	Annually	
	Quantity of municipal waste land filled	Reporting by (LBRuT) Street Scene performance	3 year programme	Data will be reported elsewhere (WLWP) and therefore need to be reported only every 3 years.
2) To make the most efficient use of land, remediate and reuse contaminated land and safeguard soil quantity and quality.	Number of contaminated land sites, remediated or investigated with no further requirement for remediation	(LBRuT) Special Projects team	3 year programme	
3) Reduce air and noise pollution, including reducing emissions of greenhouse gases,	Number of days p.a. when air pollution is moderate or high for PM10*	(LBRuT) Special Projects team LBRuT	3 year programme	*Daily mean particles (PM10) not to exceed 50 micrograms per cubic metre, more than 35 times a year, at any measuring site

SA Objective	Monitoring indicator	Monitored by	Timeframe	Comments
and ensure air quality improves.	Percentage of regulated CO ₂ emissions saved below Building Regulations 2010 target level through all low carbon measures (for developments subject to Sustainable Construction Checklist – SCC).	LBRuT monitoring*	Annually through monitoring of Sustainable Construction Checklist	
	Number of new developments (subject to SCC) that incorporate measures to reduce noise.	LBRuT monitoring	Annually through monitoring of Sustainable Construction Checklist	
4) Minimise congestion and pollution by reducing the need to travel, encourage alternatives to the car and making best use of existing transport infrastructure.	Percentage of completed non residential development complying with maximum parking standards set out in the LDF.	LBRuT monitoring	Annually	
	No of households registered with a car club	LBRuT monitoring	3 year programme	
	Percentage of trips by main mode: walking and cycling	LBRuT monitoring	3 year programme	
	Level of parking occupancy in town and local centre car parks.	LBRuT monitoring	Annually	
5) To maintain groundwater and surface water quality, conserve water and	Planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.	Environment Agency and LBRuT	Annually	

SA Objective	Monitoring indicator	Monitored by	Timeframe	Comments
reduce the risk of flooding.	Proportion of residential developments subject to the Sustainable Construction Checklist with a maximum water consumption target of 105 litres/person/day.	LBRuT monitoring	Reported on 3-yearly basis through monitoring of Sustainable Construction Checklist	
	Number of new developments subject to the Sustainable Construction Checklist that have incorporated sustainable drainage in their development; by type of sustainable drainage technique	LBRuT monitoring	Reported on 3-yearly basis through monitoring of Sustainable Construction Checklist	
	Change in area of permeable surfacing (net gains and net losses in sqm) as a result of new developments subject to the Sustainable Construction Checklist.	LBRuT monitoring	Reported on 3-yearly basis through monitoring of Sustainable Construction Checklist	
6) To promote sustainable energy use through reducing energy use by maximising energy efficiency, use of zero- and low carbon technologies and	Number of new developments subject to the Sustainable Construction Checklist that have incorporated energy efficient design with a specific heat demand of less than equal to 15kWh/sqm	LBRuT monitoring	Reported on 3-yearly basis through monitoring of Sustainable Construction Checklist	

SA Objective	Monitoring indicator	Monitored by	Timeframe	Comments
reduce carbon dioxide emissions through the increased use of renewable energy.	Energy trends data at LA level	DECC data	Annually	
7) Conserve and enhance biodiversity, avoiding irreversible losses, through responsible management of all wildlife sites and species, and through the enhancement of wildlife corridors.	Loss of or inappropriate development on designated SSSIs, and Other Sites of Nature Importance.	LBRuT monitoring	annually	
	River water bodies classified under the Water Framework Directive to achieve good ecological status	Environment Agency monitoring	3 year programme	
	No of developments subject to the SCC which improve on-site biodiversity by incorporating new features and/or habitats, by type of features.	LBRuT monitoring	Reported on 3-yearly basis through monitoring of Sustainable Construction Checklist	
	No of developments subject to the SCC incorporating green roofs, by type	LBRuT monitoring	Annually through monitoring of Sustainable Construction Checklist	
	Area of borough deficient in access to Sites of Nature Importance (hectares) (includes SSSIs and Other Sites of Nature Importance)	LBRuT monitoring	3 year programme	

SA Objective	Monitoring indicator	Monitored by	Timeframe	Comments
8) Promote high quality places, spaces and buildings and conserve and enhance the borough's landscape and townscape character and its heritage assets.	Number of Listed Buildings or Buildings of Townscape Merit demolished	LBRuT monitoring	annual	
	Number of buildings on/added/removed from the English Heritage "At Risk" Register p.a.	LBRuT monitoring	3 year programme	
	Loss/inappropriate development on designated open spaces e.g MOL, River Thames, Green Belt, OOLTI and public open space	LBRuT monitoring	annual	
	The level of satisfaction with the design and layout of new housing schemes	LBRuT monitoring	3 year programme	
9) To make best use of previously developed land and existing buildings, encouraging sustainable construction practices.	Percentage of new homes built to Lifetimes Homes standards (see also 11 below)	LBRuT monitoring	3 year programme	
	Proportion of new residential developments that meet Code for Sustainable Homes Level 3	LBRuT monitoring	Annually through monitoring of Sustainable Construction Checklist	
	Proportion of new non residential buildings over 100sqm to meet the relevant BREEAM "excellent" standard.	LBRuT monitoring	Annually through monitoring of Sustainable Construction Checklist	

SA Objective	Monitoring indicator	Monitored by	Timeframe	Comments
	Proportion of residential conversions that can be assessed under EcoHomes (or any subsequent new applicable standard) that meet the “excellent” rating.	LBRuT monitoring	Annually through monitoring of Sustainable Construction Checklist	
10) To provide new housing opportunities and sufficient affordable housing that meets local needs.	Net additional dwellings for reporting year, over previous, years and in future	LBRuT monitoring	Annually	
	Percentage of all new housing completions which is affordable housing	LBRuT monitoring	Annually	
	Completions by dwelling size	LBRuT monitoring	3 year programme	
	Conversion of office space to residential on upper floors (amount in m2) where planning permission is needed.	LBRuT monitoring	TBC	Specific Twickenham AAP monitoring indicator
11) To create and maintain safer and more secure communities.	Percentage of new homes built to wheelchair standards on developments	LBRuT monitoring	3 year programme	
	Percentage of new homes built to Lifetimes Homes standards (also see 9 above)	LBRuT monitoring	3 year programme	

SA Objective	Monitoring indicator	Monitored by	Timeframe	Comments
	Number of recorded crimes pa. Retain position in top 3 for lowest crime figures in Met Police area.	Metropolitan Police Service figures	Annually	
	Progress on Public Transport improvements in 5 areas of relative disadvantage	LBRuT monitoring	3 year programme	
12) To facilitate the improved health and well being of the population, including enabling people to stay independent and ensuring access to those health, education, environment, sport, leisure and recreation facilities and services that are required.	Amount of completed floorspace in clinic/health centre use	LBRuT monitoring	3 year programme	
	Number of planning Obligations achieved and money raised for community uses by type (health, sport, education, etc).	LBRuT monitoring	Annually	
	Improving public health profile. Ranking in the top 3 within the SHA for the range of indicators used in the Local Health Profiles.	Department of Health	Annually	

SA Objective	Monitoring indicator	Monitored by	Timeframe	Comments
	Percentage of completed floorspace (new development & net additional floorspace) for town centre uses (A2, B1a and D2) within town centre boundaries/mixed use areas. For A1, % of completed floorspace within, adjacent to or well-related to designated frontages.	LBRuT monitoring	Annually	
	Vacancy rates within designated shopping frontages for Richmond, the district and smaller centres.	LBRuT monitoring	Annually	
	Proportion of retail A1 uses in key shopping frontages	LBRuT monitoring	3 year programme	
	Percentage of new retail completions less than 100m ²	LBRuT monitoring	TBC	Specific Twickenham AAP monitoring indicator
	Completions for appropriate expansion to existing retail units in m ² .	LBRuT monitoring	TBC	Specific Twickenham AAP monitoring indicator
	Investigation of potential for BID completed by 2013	LBRuT monitoring	TBC	Specific Twickenham AAP monitoring indicator

SA Objective	Monitoring indicator	Monitored by	Timeframe	Comments
	Progress on promotion of visitor destinations in Twickenham (St Mary's Church, Twickenham Museum, Twickenham Library and the Mary Wallace Theatre)	LBRuT monitoring	TBC	Specific Twickenham AAP monitoring indicator
	Progress on promotion of markets and events in Twickenham.	LBRuT monitoring	Annually	Specific Twickenham AAP monitoring indicator
14) To promote and encourage a buoyant and diverse economy that will provide sustainable economic growth.	Amount and type of completed employment floorspace developed by employment type.	LBRuT monitoring	Annually	
	Employment land for which planning permission has been granted by UCO for the monitoring year (ha)	LBRuT monitoring	Annually	
	Number of new businesses in Twickenham town centre compared to previous year (report on retailers separately, report on net figure)	LBRuT monitoring	Annually	Specific Twickenham AAP monitoring indicator
	Overall number of businesses in town centre (TCLUS or other reliable annual source).	LBRuT monitoring	TBC	Specific Twickenham AAP monitoring indicator

SA Objective	Monitoring indicator	Monitored by	Timeframe	Comments
15) Provide appropriate commercial development and training opportunities to meet the needs of the local and sub-regional economy.	Amount of employment floorspace lost to completed non-employment uses (identifying use classes)	LBRuT monitoring	Annually	
	Completed small business units under 250sqm	LBRuT monitoring	3 year programme	
	No of workers in the borough (employees in employment)	LBRuT monitoring	3 year programme	
	Number of unemployed (claimant count) and estimated rate (GLA estimates)	LBRuT monitoring	3 year programme	