



London Borough of Richmond upon Thames

Local Plan

Review of existing Core Strategy and Development Management policies, including assessment against national and regional guidance, local evidence and need, including the policy approach in the Local Plan

To support the Local Plan Publication consultation from 4 January to 15 February 2017

Please note this document is set up to be printed in A3.

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(Note that the original rationale and scope for review can be found within the earlier versions – see below)

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Review of Core Strategy and Development Management Plan policies, including assessment against national and regional guidance, local evidence and need, including justification for policy approach in Local Plan

Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Policy approach in Publication Local Plan
CP1 Sustainable Development	Sustainable development is the theme running throughout the NPPF, incorporating the three dimensions: economic, environmental and social. The NPPF contains a presumption in favour of sustainable development. Paras 95 and 96 relate to sustainable construction.	London Plan policy 5.3 states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.	<ul style="list-style-type: none"> • Sustainable Construction Checklist SPD (2016) • Authority's Monitoring Report • There is no specific requirement for an overarching sustainable development policy. 	<ul style="list-style-type: none"> • Sustainable development and how this is applied locally is set out within the Spatial Strategy of the Local Plan. • Relevant and more specific parts of this policy have been incorporated into new Policy LP 22 Sustainable Design and Construction as well as other policies within the Local Plan, such as LP 10 Local Environmental Impacts, Pollution and Land Contamination.
DM SD 1 Sustainable Construction	NPPF para 95 sets out the actions that should be taken by LPAs to support the move to a low carbon future.	London Plan policy 5.3 sets out a series of sustainable design principles. Also policy 5.2 minimising carbon dioxide emissions detailed below. The Mayor's Sustainable Design and Construction SPG (2014)	<ul style="list-style-type: none"> • The Council's Sustainable Construction Checklist SPD (adopted January 2016) sets out the Council's requirements for sustainable design and construction including the Council's requirements for carbon dioxide reductions. • The Council seeks a 35% reduction in CO2 emissions beyond Building Regulations 2013 in line with the London Plan policy 5.2. This is expressed in existing policy DM SD 1 as a 40% improvement on Building Regulations 2010, which is the equivalent. Zero carbon standards in major residential schemes 	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 22 Sustainable Design and Construction.
CP2 Reducing Carbon Emissions	NPPF para 97: LPAs should have a positive strategy to promote energy from renewable and low carbon sources; design their policies to maximise renewable and low carbon energy development.	London Plan policy 5.2: Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy. The policy sets out the targets for carbon dioxide emissions reduction in resi and non-domestic buildings in relation to improvement on Building Regulations Policy 5.8 innovative energy technologies GLA Guidance on Energy Planning (March 2016) sets out the Mayor Of London's intention to implement zero carbon policy from 1 st October 2016. The MALP Viability Evidence tests the requirement for zero carbon homes, concluding that it would not affect overall viability and deliverability of housing (i.e. the estimated cost impact of zero carbon would represent circa an additional 1-1.4% of base build cost).	<ul style="list-style-type: none"> • The Council's Sustainable Construction Checklist SPD (2016) includes details of the Council's carbon dioxide reduction targets at 35% below Building Regulations as per London Plan policy 5.2. • The requirement for zero carbon standards in major residential schemes is an adopted policy within the London Plan and in effect since October 2016. Zero carbon standards will apply to major non-residential schemes from 2019. The Council has set up a Carbon Offset Fund to allow the implementation of zero carbon standards. • Evidence to support the zero carbon approach is set out in the MALP viability evidence produced by the Greater London Authority. • Evidence base for carbon emissions reductions policies (2008) • Authority's Monitoring Report 	<ul style="list-style-type: none"> • The requirement for zero carbon standards has been incorporated into new Policy LP 22 Sustainable Design and Construction. • Policy LP 22 now references the Energy Hierarchy and provides commentary on how this should be followed to achieve the energy and carbon dioxide emission reduction targets.
DM SD 2 Renewable Energy and Decentralised Energy Networks	NPPF para 96: new development should comply with adopted Local Plan policies on decentralised energy supply unless it can be demonstrated by the applicant,	London Plan policies 5.5 and 5.6: The Mayor expects 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. Development proposals	<ul style="list-style-type: none"> • Sustainable Construction Checklist SPD (2016) • Heat Mapping Study (2012) identifies opportunities for decentralised energy networks in Richmond; the following 7 clusters were identified: 1. Richmond Centre 2. Teddington 	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 22 Sustainable Design and Construction.

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	<p>having regard to the type of development involved and its design, that this is not feasible or viable.</p> <p>NPPF para 97 (above) encourages renewable and decentralised energy.</p>	<p>should evaluate the feasibility of Combined Heat and Power (CHP) systems.</p> <p>Also Policy 5.7 on renewable energy</p> <p>Delivering London's Energy Future: the Mayor's climate change mitigation and energy strategy (2011)</p>	<p>3. Mortlake 4. Twickenham Centre 5. Richmond-Wandsworth 6. Richmond-Kingston 7. Richmond-Hounslow</p> <p>Of these identified clusters, the Mortlake opportunity is perhaps the best for a cluster within the borough alone, and would benefit from further feasibility work (e.g. as part of the Stag Brewery redevelopment)</p> <p>For maps of the above mentioned clusters, please refer to the Heat Mapping Study.</p> <ul style="list-style-type: none"> • Climate Change Strategy (2009) • Evidence Base for Carbon Emissions Reduction Policies (2008) summarises the feasibility of different types of renewable energy technologies across the borough including wind, solar, ground source heating and cooling, biomass heating and CHP 	
DM SD 3 Retrofitting	No specific guidance although implicit in the NPPF paras 93-104	London Plan policy 5.4: Boroughs should identify opportunities for reducing carbon dioxide emissions from the existing building stock by identifying potential synergies between new developments and existing buildings through the retrofitting of energy efficiency measures, decentralised energy and renewable energy opportunities (see Policies 5.5 and 5.7).	<ul style="list-style-type: none"> • Sustainable Construction Checklist SPD (2016) <p>It is not compulsory to complete the SCC for retrofits, conversions, internal alterations etc., however, the Council strongly encourages it.</p>	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 22 Sustainable Design and Construction.
CP3 Climate Change - Adapting to the Effects	NPPF paras 93-104, specifically para 99 states that 'Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change'. Planning Practice Guidance, Flood Risk and Coastal Change, which Advises on how planning can take account of the risks associated with flooding and coastal change in plan-making and the application process	<p>London Plan Chapter 5</p> <p>The Mayor's Climate Change Adaptation Strategy (2011)</p> <p>River Thames Scheme (RTS) for managing fluvial flood risk between Datchet and Teddington (Environment Agency)</p> <p>Thames Estuary 2100 (TE2100) Scheme for managing tidal flood risk in the Thames estuary (Environment Agency).</p>	<ul style="list-style-type: none"> • Council's Strategic Flood Risk Assessment (2016): • Local Flood Risk Management Strategy 2015-2020 • Climate Change Strategy (2009) • Surface Water Management Plan (2011) • Preliminary Flood Risk Assessment (2011) • Infrastructure Delivery Plan (2012) assesses the impact of climate change on future infrastructure requirements. 	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 20 Climate Change Adaptation
DM SD 4 Adapting to Higher Temperatures and Need for Cooling	No specific guidance in NPPF	London Plan policy 5.9: Local Plans should develop more detailed policies to support the avoidance of overheating and to support the cooling hierarchy. Policy 5.10 Urban Greening	<ul style="list-style-type: none"> • Sustainable Construction Checklist SPD (2016) 	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 20 Climate Change Adaptation
DM SD 5 Living Roofs	No specific guidance in NPPF	London Plan policy 5.11: Boroughs may wish to develop more detailed policies and proposals to support the development of green roofs and the greening of development sites. Boroughs should also promote the use of green roofs in smaller developments, renovations and extensions where feasible.	The borough is likely to be affected by climate change effects in the medium- and long-term; therefore, living roofs may help to adapt to a changing climate by for example absorbing rainfall and alleviating surface water flooding events, as well as helping to reduce air temperatures through evaporation and evapotranspiration processes therefore counteracting the urban heat island effect.	<ul style="list-style-type: none"> • This policy has been incorporated into New Policy LP 17 Green Roofs and Walls. In addition, it has been expanded to incorporate green walls.

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DM SD 6 Flood Risk	<p>Paras 99 -104 of NPPF and PPG on flood risk.</p> <p>The Environment Agency's standing advice and "Flood Map for Planning" is the main source of advice for applicants and developers</p>	<p>Policy 5.12 Flood Risk Management</p> <p>London FRMP and Regional Flood Risk Appraisal</p> <p>Thames Estuary 2100 (TE2100) Scheme for managing tidal flood risk in the Thames estuary (Environment Agency).</p> <p>River Thames Scheme (RTS) for managing fluvial flood risk between Datchet and Teddington (Environment Agency)</p>	<p>The borough is at risk of both tidal and fluvial flooding as well as surface water and groundwater flooding.</p> <p>The Council is a designated Lead Local Flood Authority (LLFA), and under the Flood and Water Management Act (2010), the Council is responsible for managing local flood risk across the borough, including surface water.</p> <p>Local evidence on flood risk is set out in the following Council documents:</p> <ul style="list-style-type: none"> • Council's Strategic Flood Risk Assessment (2016) • Local Flood Risk Management Strategy 2015-2020 • Preliminary Flood Risk Assessment (2011) • Surface Water Management Plan (2011): Richmond borough is susceptible to surface water flooding (high likelihood of heavy rainfall and storms overloading the drainage system). • LBRuT SuDS Guidance Document (2015) • Authority's Monitoring Report <p>In addition, the Council adopted a Local Validation Checklist in April 2015, with amendments made in December 2016, which sets out minimum requirements for Flood Risk Assessments.</p>	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 21 Flood Risk and Sustainable Drainage
DM SD 7 Sustainable Drainage	<p>NPPF para 103: gives priority to the use of sustainable drainage systems.</p> <p>The Flood and Water Management Act (2010)</p>	<p>London Plan policy 5.13 sets out the drainage hierarchy</p> <p>Drain London</p> <p>London Sustainable Drainage Action Plan (Oct 2015 - draft for Consultation)</p>	<p>The London Borough of Richmond is a designated Lead Local Flood Authority (LLFA), under the Flood and Water Management Act (2010), and is responsible for managing local flood risk across the borough, including surface water.</p> <p>Surface Water Management Plan (2011): Richmond borough is susceptible to surface water flooding (high likelihood of heavy rainfall and storms overloading the drainage system).</p> <p>LBRuT SuDS Guidance Document (2015)</p> <p>The Council adopted a Local Validation Checklist in April 2015, with amendments made in September 2015, which requires a Statement on Sustainable Drainage Systems for all major developments; all others are encouraged (as part of the Flood Risk Assessment, Sustainable Construction Checklist or separate statement)</p>	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 21 Flood Risk and Sustainable Drainage
DM SD 8 Flood Defences	<p>No specific national guidance on flood defences.</p> <p>Other legislation</p> <ul style="list-style-type: none"> • Water Resources Act 1991 • Flood Defence (Land Drainage) Byelaws/Sea Defence Byelaws • Environment Act 1995 • Flood and Water Management Act 2010 	<p>See London Plan policy 5.12</p>	<ul style="list-style-type: none"> • Council's Strategic Flood Risk Assessment (2016) • Thames Estuary 2100 (TE2100) scheme for managing tidal flood risk in the Thames estuary (Environment Agency) will allow water levels to rise and there is a requirement to raise the height of flood defences. • Separate consent from the Environment Agency is required for any works within 16 metres of the tidal Thames flood defences; and for any works within 8 metres on a fluvial river (including River Crane, Beverley Brook, fluvial River Thames, which is upstream of Teddington Lock); this is irrespective of planning permission 	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 21 Flood Risk and Sustainable Drainage. • The policy has been updated to include further details around the TE2100 Scheme.
DM SD 9 Protecting Water Resources and Infrastructure	<p>NPPF para 94: Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations.</p> <p>Para 100: Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape.</p>	<p>London Plan policy 5.14: Boroughs should identify wastewater infrastructure requirements</p> <p>Policy 5.15: Residential development should minimise the use of mains water. Sets out a target of 105 litres or less per head per day</p> <p>Thames River Basin Management Plan (2009)</p>	<p>Changing patterns of rainfall will impact on water resources and water quality. Less water will be available during summers due to lower rainfall while at the same time the demand will increase.</p> <p>All water companies that serve London are located in areas classified as seriously water stressed.</p> <p>Sustainable Construction checklist SPD (2015) sets out the requirement for residential developments to minimise the use of mains water by incorporating water saving measures and equipment, and designing dwellings so that mains water consumption would meet a target of 105 litres or less per head per day (excluding an allowance of 5 litres or less per head per day for external water consumption) as set out in Part G of the Building regulations – this is in line with the London Plan as well as national optional higher standard that can be applied in water stressed</p>	<ul style="list-style-type: none"> • Elements of this policy on water efficiency have been incorporated into new Policy LP 22 Sustainable Design and Construction. The optional 'higher' maximum water consumption standard of 110 litres per person per day for homes has been adopted. • Elements of this policy that cover water quality and sewerage provision have been incorporated into new Policy LP 23.

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	Building Regulations Part G		areas.	
DM SD 10 Water and Sewerage Provision	No specific guidance in NPPF	London Plan policy 5.14 : developments must ensure that adequate wastewater capacity is available.	Need to address potential sewer flooding and ensuring capacity exists in the existing public sewerage and water supply networks to serve new developments. Infrastructure Delivery Plan (2012) assesses the impact of climate change on future infrastructure requirements. Thames Water Assessment Management Plan (2015-2020)	<ul style="list-style-type: none"> This policy has been incorporated into new Policy LP 23.
CP6 Waste	National Planning Policy for Waste (2014) National Waste Management Plan for England (2013) National policy statements for waste water and hazardous waste	London Plan policy 5.16 on waste net self-sufficiency states that the Mayor wishes to manage the equivalent of 100% of London's waste within London by 2026 and work towards zero biodegradable or recyclable waste to landfill by 2026. This policy also sets a target of 95 per cent for recycling / reuse of construction and demolition waste by 2020. Policy 5.17 states that boroughs must allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in this Plan. If there is a loss of an existing waste management site to non-waste use, additional compensatory site provision will be required. Policy 5.18 states that local plans should require developers to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials. Policy 5.20 requires local plans to support the development of aggregate recycling facilities, subject to local amenity conditions.	The Council is required to meet the London Plan apportionment requirements and comply with national policy and the national waste management plan. Due to the adoption of the West London Waste Plan (WLWP) (2015), local Core Strategy policy CP6 and UDP policy CCE22 have been superseded. There is an adopted SPD on Refuse and Recycling Storage Requirements (2015) that needs to be referred to by a policy Local Validation Checklist (2015)	<ul style="list-style-type: none"> This policy has been incorporated into new Policy LP 24 Waste Management.
CP4 Biodiversity	This policy is in accordance with the NPPF, which states that the planning system should contribute to and enhance the natural and local environment and that Local Plans should plan positively for the creation, protecting and enhancement and management of networks of biodiversity and green infrastructure. See NPPF paras 109, 113, 114 and 117, and PPG in relation to biodiversity, ecosystems and green infrastructure.	This policy is in general conformity with the London Plan, which requires local policies to protect priority species and habitats, ensure sites of European and national importance are clearly identified, and identify, protect and enhance corridors of movement, such as green corridors that are of strategic importance. See London Plan policy 7.19 All London Green Grid SPG (2012) Mayor's Biodiversity Strategy (2002) Development plan policies for biodiversity - Best Practice Guidance of The London Plan Draft update (2012)	<ul style="list-style-type: none"> All public authorities in England and Wales have a duty to have regard to the purpose of conserving biodiversity in the exercise of their functions. There is a need to identify, protect and enhance biodiversity including the sites of importance for nature conservation in the borough, taking account of the relevant Biodiversity Action Plans for London and the borough as well as 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' (which replaced the UK Biodiversity Action Plan, including the sites of importance for nature conservation in the borough Need to require new biodiversity features to be incorporated into new developments to provide net gains in biodiversity where possible. Richmond Biodiversity Action Plan (2005) Authority's Monitoring Report 	<ul style="list-style-type: none"> This policy has been taken forward as part of new Policy LP 15 Biodiversity. Greater emphasis is given to connecting biodiversity features and habitats to the wider ecological and green infrastructure networks.
Policy DM OS 5 Biodiversity and	This policy is in accordance with the NPPF, which states that the planning	This policy is in general conformity with the London Plan, which requires local policies	<ul style="list-style-type: none"> Need to identify, protect and enhance biodiversity including the sites of importance for nature conservation in the borough 	<ul style="list-style-type: none"> This policy has been incorporated into new Policy

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new development	<p>system should contribute to and enhance the natural environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible.</p> <p>See NPPF para 109 and PPG in relation to biodiversity, ecosystems and green infrastructure.</p>	<p>to protect priority species and habitats, ensure sites of European and national importance are clearly identified, and identify, protect and enhance corridors of movement, such as green corridors that are of strategic importance.</p> <p>See London Plan policy 7.19</p> <p>All London Green Grid SPG (2012)</p> <p>Mayor's Biodiversity Strategy (2002)</p> <p>Development plan policies for biodiversity - Best Practice Guidance of The London Plan (2005)</p> <p>Biodiversity Action Reporting</p>	<ul style="list-style-type: none"> • Need to require new biodiversity features to be incorporated into new developments to provide net gains in biodiversity where possible. • Richmond Biodiversity Action Plan (2005) 	LP 15 Biodiversity.
CP7 Maintaining and Improving the Local Environment	<p>This policy is considered to be in general conformity with NPPF and PPG, which focus on high quality design and conserving heritage assets.</p> <p>See NPPF core planning principles as well as paras 17, 58-61, 126, 137, 141,156 and 157(7) (8) as well as the PPG relating to the historic environment. In addition, paras 126 and 157(8) refer to the overarching requirement for a positive strategy for the historic environment.</p>	<p>The London Plan and its supporting portfolio of Shaping Neighbourhoods SPGs highlight the importance of good design and local character. This local policy complements the regional and national guidance and sets out how the differing local characters should be sustained, protected and enhanced.</p> <p>See London Plan policies 7.1, 7.4, 7.5 and the Shaping Neighbourhoods – Character and Context SPG (2014).</p>	<ul style="list-style-type: none"> • The Council has developed a range of SPDs, including Village Planning Guidance for some areas of the borough, Design Quality, House Extensions and External Alterations, Small and Medium Housing Sites, Front Gardens and Shop Fronts. These focus on maintaining and enhancing the quality of the local built environment and provide the necessary detail to assess context, local character and design quality. In particular, the Council's Village Planning Guidance SPDs identify the key features and characteristics of the borough's village areas that contribute to local character and that are valued by local communities. The SPDs are the main starting point for design guidance for those seeking to make changes to their properties or to develop new properties in the area. • Village Planning Guidance (SPDs): locally specific guidance on design, character and local features / assets; to be established for all village areas of the borough; Adopted SPDs include: Kew (2014), Whitton and Heathfield (2014), Mortlake (2015), Barnes (2015), East Sheen (2015), St Margarets (2016), Richmond and Richmond Hill (2016) and East Twickenham (2016); In progress: Hampton, Hampton Hill, Teddington and Hampton Wick; Rolling programme to be continued into 2017, including for Twickenham and Strawberry Hill • Design Quality SPD (2006) • Public Space Design Guide (2006) • Town Centre Health Checks (2013) • Town Centre Environmental Quality Assessment (December 2012) • LBRuT Community Plan (2016-2020) • Whilst it is not proposed to develop a borough-wide characterisation study, we will consider producing an overarching paper that addresses how the borough's Village Planning Guidance SPDs provide borough-wide coverage and evidence on the individual characters of the area; it could also address any strategic character and heritage issues. • The Council's Uplift programme continues to rejuvenate the Whitton, Hampton North, Barnes, Mortlake, Ham, Fulwell and Hampton Hill areas of the Borough, which local people say are in need of improvement. 	<ul style="list-style-type: none"> • This policy has been taken forward as part of the policies within the Local Character and Design section of the Plan, and in particular new Policy LP 1 on Local Character and Design Quality.
DM HD 1 Conservation Areas - designation,	Whilst the policy is overall in accordance with national policy, there is a need to reflect the guidance on designated heritage	This policy complements the London Plan, which states that heritage assets, including their settings, should be identified, protected, enhanced, and access improved	<ul style="list-style-type: none"> • The borough's exceptional historic environment needs to be sustained and, where possible, enhanced. New development in particular should conserve and, where appropriate, make a positive contribution to the character, appearance and distinctiveness of Conservation Areas, Listed Buildings, Scheduled Monuments and Historic Parks and Gardens and their setting. 	<ul style="list-style-type: none"> • This policy has been incorporated into an overarching policy relating to designated heritage assets,

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protection and enhancement	<p>assets and how to assess substantial harm.</p> <p>See NPPF core planning principles as well as paras 17, 127, 128, 129, 132, 133 and 137 as well as the PPG relating to designated heritage assets.</p>	<p>where appropriate.</p> <p>See London Plan policy 7.8, which applies to both designated and non-designated assets</p>	<ul style="list-style-type: none"> The Council has developed a variety of Conservation Area Statements and studies, as well as Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPD) relating to Conservation Areas and Listed Buildings. These provide detailed and locally specific guidance on the implementation of heritage policies. The review and consolidation of the policies provides the opportunity to ensure that the protection of a designated heritage asset is consistent with its significance and that the assessment of harm and substantial harm relates to its significance. It is also important to ensure that a deteriorated state of an asset as a result of deliberate neglect or damage is not taken into account when making decisions. The Council's positive strategy for the historic environment, as required by national guidance, is made up of the following (this list is not exhaustive): <ul style="list-style-type: none"> the Local Plan policies relating to heritage assets; Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPDs) on heritage assets, including on locally listed buildings, and Village Planning Guidance; maintaining and, if required reviewing, Conservation Area boundaries as well as Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans; ensuring Listed Buildings (including locally listed buildings) are maintained and contribute to the character of the place; Article 4 Directions; Site briefs / Masterplans for sensitive sites. There is a continued need to protect the borough's Conservation Areas New development should conserve and where appropriate enhance the character and appearance of the Conservation Areas Conservation Area studies and Conservation Statements Conservation Area SPG (2005) Design Quality SPD (2006) 	<p>i.e. new Policy LP 3 Designated Heritage Assets.</p>
DM HD 2 Conservation of Listed Buildings and Scheduled Ancient Monuments	<p>Whilst the policy is overall in accordance with national policy, there is a need to reflect the guidance on designated heritage assets and how to assess substantial harm.</p> <p>See NPPF core planning principles as well as paras 17, 127, 128, 129, 132, 133 and 137 as well as the PPG relating to designated heritage assets.</p> <p>Historic England guidance on 'Enabling Development and the Conservation of Significant Places' (2008)</p>	<p>This policy complements the London Plan, which states that heritage assets (applicable to both designated and non-designated assets), including their settings, should be identified, protected, enhanced, and access improved where appropriate.</p> <p>See London Plan policy 7.8, which applies to both designated and non-designated assets</p>	<ul style="list-style-type: none"> See evidence and need above under DM HD 1 Need to preserve and where possible enhance Listed Buildings Need to preserve and where possible enhance Scheduled Ancient Monuments Listed Buildings SPG (2005) Historic Buildings – Maintenance and Repair SPG (2005) 	<ul style="list-style-type: none"> This policy has been incorporated into an overarching policy relating to designated heritage assets, i.e. new Policy LP 3 Designated Heritage Assets.
DM HD 3 Buildings of Townscape Merit	<p>Whilst the policy is overall in accordance with national policy, there is a need to reflect the guidance on non-designated heritage assets and how to achieve a balanced judgement with regard to any potential harm and the</p>	<p>This policy complements the London Plan, which states that heritage assets, including their settings, should be identified, protected, enhanced, and access improved where appropriate.</p>	<ul style="list-style-type: none"> Non-designated heritage assets make an important contribution to the borough's unique and distinctive character. They have been identified as having a degree of significance and thus meriting consideration in planning decisions. The Council has developed a range of SPDs, including on Buildings of Townscape Merit as well as Village Planning Guidance, which provide detailed and locally specific guidance on the implementation of the heritage and conservation policies. 	<ul style="list-style-type: none"> This policy has been incorporated into an overarching policy relating to non-designated heritage assets, i.e. new Policy LP 4 Non-Designated Heritage Assets.

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	<p>significance of the asset.</p> <p>See NPPF core planning principles as well as paras 17, 135 and the PPG on non-designated heritage assets.</p>	<p>See London Plan policy 7.8, which applies to both designated and non-designated assets</p>	<ul style="list-style-type: none"> The review and consolidation of the policies provides the opportunity to ensure that the protection of a non-designated heritage asset is consistent with its significance and that the assessment of harm relates to its significance. Need to preserve Buildings of Townscape Merit Need to set out criteria for the designation of locally listed buildings Buildings of Townscape Merit SPD (May 2015) 	
DM HD 4 Archaeological Sites	<p>Whilst the policy is overall in accordance with national policy, there is a need to reflect the guidance on non-designated heritage assets and how to assess substantial harm. In addition, there is a need to reflect the two categories of non-designated sites of archaeological interest as set out in the NPPF and PPG.</p> <p>See NPPF core planning principles (para 17) and PPG.</p>	<p>This policy complements the London Plan, which states that heritage assets and archaeology should be identified and protected.</p> <p>The Greater London Archaeological Priority Areas (APAs) are areas where there is significant known archaeological interest or potential for new discoveries. APAs are used to help highlight where development might affect heritage assets.</p> <p>See London Plan policies 7.8, which applies to both designated and non-designated assets, and policy 7.9 as well as London's Foundations SPG (2012)</p>	<ul style="list-style-type: none"> Need to protect, enhance and promote borough's archaeological heritage Need to reflect the Greater London Archaeological Priority Areas (APAs) in the borough National policy guidance identifies two categories of sites that are of archaeological interest: <ol style="list-style-type: none"> Those that are demonstrably of equivalent significance to Scheduled Monuments and are therefore considered subject to the same policies as those for designated heritage assets; and Other non-designated heritage assets of archaeological interest, which are of lesser heritage significance, but should be subject to heritage policies. On occasion the understanding of a site may change following assessment and evaluation prior to a planning decision and move it from this category to the first. The borough's Archaeological Priority Areas (APAs) are due to be reviewed in 2018 by GLAAS as part of a rolling programme of reviews across London. Whilst there may be a benefit of including the APA map within the Local Plan, as the current APAs are out of date and no longer contain a reliable data set, the Local Plan will provide a link to the latest available information. 	<ul style="list-style-type: none"> This policy has been taken forward as new Policy LP 7 Archaeology.
DM HD 5 World Heritage Site	<p>Whilst the policy is overall in accordance with national policy, there is a need to reflect the guidance on designated heritage assets and how to assess substantial harm.</p> <p>See NPPF core planning principles as well as paras 17, 127, 128, 129, 132, 133 and 137 and the PPG on World Heritage Sites.</p>	<p>This policy complements the London Plan policy 7.10, which states that new development in and within the buffer zone of the World Heritage Sites should conserve, promote, make sustainable use of and enhance their significance.</p> <p>London's World Heritage Sites - Guidance on Settings SPG (2012)</p>	<ul style="list-style-type: none"> Royal Botanic Gardens Kew Landscape Master Plan (2010) Royal Botanic Gardens Kew World Heritage Site Management Plan (2014) There is a need to protect, promote, conserve and where appropriate enhance the Royal Botanic Gardens Kew, World Heritage Site (WHS). It is recognised that the policy could expand on the outstanding universal value of the WHS. There is also a need to include a map of the designated WHS, and its buffer zone, to ensure that development proposals take account of and comply with the Royal Botanic Gardens, Kew Landscape Master Plan (2010) and the Royal Botanic Gardens, Kew World Heritage Site Management Plan (2014). As part of a positive strategy for the historic environment, it is important to ensure that known and potential threats to the borough's heritage designated assets are addressed. In this context, the protection of the setting of the WHS, including the cross-boundary issues in relation to tall building proposals in Brentford and Hounslow's Great West Corridor, will be of importance. There is a need to ensure there is an understanding that the setting of the WHS is more extensive than the defined buffer zone, and this should be defined within the policy. 	<ul style="list-style-type: none"> This policy has been taken forward as new Policy LP 6 Royal Botanic Gardens, Kew World Heritage Site.
DM OS 4 Historic Parks, Gardens and Landscapes	<p>Whilst the policy is overall in accordance with national policy, there is a need to reflect the guidance on designated heritage assets and how to assess substantial harm.</p> <p>See NPPF core planning principles as well as paras 17, 127, 128, 129, 132 and 133 as well as the PPG relating to designated heritage assets.</p>	<p>This policy complements the London Plan, which states that heritage assets, including their settings, should be identified, protected, enhanced, and access improved where appropriate.</p> <p>See London Plan policy 7.8.</p>	<ul style="list-style-type: none"> Historic England 'Register of Historic Parks and Gardens' Need to preserve and where possible enhance registered historic parks and gardens. Authority's Monitoring Report Also see above under DM HD 1. 	<ul style="list-style-type: none"> This policy has been incorporated into an overarching policy relating to designated heritage assets, i.e. new Policy LP 3 Designated Heritage Assets.

Review of Core Strategy and Development Management Plan policies, including assessment against national and regional guidance, local evidence and need, including justification for policy approach in Local Plan

Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Policy approach in Publication Local Plan
DM HD 6 War Memorials	<p>Whilst there is no specific guidance in the NPPF and PPG relating to war memorials, overall the policy is in accordance with national policy, although there is a need to reflect the guidance on non-designated heritage assets.</p> <p>See NPPF core planning principles as well as paras 17, 135 and the PPG on non-designated heritage assets.</p>	<p>This policy complements the London Plan, which states that heritage assets, including their settings, should be identified, protected, enhanced, and access improved where appropriate.</p> <p>See London Plan policy 7.8.</p>	<p>The Council is keen to continue the protection and conservation of the borough's war memorials</p>	<ul style="list-style-type: none"> This policy has been incorporated into an overarching policy relating to non-designated heritage assets, i.e. new Policy LP 4 Non-Designated Heritage Assets.
DM HD 7 Views and Vistas	<p>Overall this policy is in accordance with the NPPF and the PPG Design guidance</p>	<p>This policy complements the London Plan policies in relation to the Mayor's identified strategic views that have to be protected, whereby the only strategic view in this borough is the view from King Henry VIII's Mound to St Paul's Cathedral.</p> <p>See London Plan policies 7.11 and 7.12 and the London View Management Framework SPG (2012)</p>	<ul style="list-style-type: none"> The overall landscape, views and vistas, particularly the views protected in law, including those portrayed in art and literature, contribute to the unique character of the borough. Need to protect and where appropriate enhance the quality of views and vistas, including those identified in the Local Plan Proposals Map Need to ensure that new developments do not negatively impact on designated views and vistas in terms of their design quality, configuration, height and layout Whilst the London Plan policies and accompanying SPG provides detailed guidance on the strategic views, there is a need to describe the locally designated views and vistas in more detail Need to clearly set out in policy what views and vistas are and ensure they can be clearly identified on the Local Plan Proposals Map There is an opportunity to take account of local views, vistas and gaps that contribute to the special character of the borough. 	<ul style="list-style-type: none"> This policy has been incorporated into an overarching policy relating to non-designated heritage assets, i.e. new Policy LP 5 Views and Vistas.
DM DC 1 Design Quality	<p>The NPPF puts great weight and importance on high quality design and good standard of amenity for all. Design policies should however avoid unnecessary prescription or detail and should not impose architectural styles or particular tastes, nor stifle innovation, originality or initiative; instead policies should promote and reinforce local distinctiveness.</p> <p>See NPPF para 17, 56, 58, 59, 60, 61 and 62</p> <p>PPG design guidance on:</p> <ul style="list-style-type: none"> layout – the way in which buildings and spaces relate to each other form – the shape of buildings scale – the size of buildings detailing – the important smaller elements of building and spaces materials – what a building is made from 	<p>London Plan policies focus on good quality environment, high architectural quality and ensuring that the design of new buildings and spaces reinforces or enhances the character of the neighbourhood; appropriate scale, proportion, detailing and materials should complement local character.</p> <p>See policies 7.1 and 7.6</p>	<ul style="list-style-type: none"> The Council has developed a range of SPDs, including Village Planning Guidance for some areas of the borough, Design Quality, House Extensions and External Alterations, Small and Medium Housing Sites, Front Gardens and Shop Fronts. These focus on maintaining and enhancing the quality of the local built environment and provide the necessary detail to assess context, local character and design quality. In particular, the Council's Village Planning Guidance SPDs identify the key features and characteristics of the borough's village areas that contribute to local character and that are valued by local communities. The SPDs are the main starting point for design guidance for those seeking to make changes to their properties or to develop new properties in the area. Need for new developments to be of high quality design and high architectural quality. The Council is developing Village Planning Guidance in the form of SPDs for all the village areas of the borough. Village Planning Guidance SPDs provide locally specific guidance on design, character and local features or assets that the communities have identified as being important to their local area. Village Planning Guidance SPDs enable the Council to look in more detail at the individuality and local character of the villages and clusters of streets. <p>Adopted SPDs include:</p> <ul style="list-style-type: none"> Kew (2014) Whitton and Heathfield (2014) Mortlake (2015) Barnes (2015) East Sheen (2015) St Margarets (2016) 	<ul style="list-style-type: none"> This policy has been taken forward as part of the policies within the Local Character and Design section of the Plan, and in particular new Policy LP 1 on Local Character and Design Quality.

Review of Core Strategy and Development Management Plan policies, including assessment against national and regional guidance, local evidence and need, including justification for policy approach in Local Plan

Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Policy approach in Publication Local Plan
			<ul style="list-style-type: none"> • Richmond and Richmond Hill (2016) • East Twickenham (2016) <p>Village Planning Guidance SPDs in progress: Hampton, Hampton Hill, Teddington and Hampton Wick; Rolling programme to be continued into 2017, including for Twickenham and Strawberry Hill</p> <ul style="list-style-type: none"> • Design Quality SPD (2006) • Small and Medium Housing Sites SPD (2006) • House Extensions and External Alterations SPD (2015) • Public Space Design Guide (2006) 	
DM DC 2 Layout and Design of Mixed Use Schemes	<p>The NPPF states that the potential of sites should be optimised by creating and sustaining an appropriate mix of uses.</p> <p>See NPPF paras 57 and 58 as well as the PPG design guidance</p>	London Plan policy 4.3 relates to mixed use development and offices and policy 7.1 to lifetime neighbourhoods.	Need to ensure that different mix of uses on a site are suitable and compatible	<ul style="list-style-type: none"> • This policy has been taken forward as part of the policies within the Local Character and Design section of the Plan, and in particular new Policy LP 1 on Local Character and Design Quality. • In particular, para 4.1.10 relates to issues of co-location and compatibility of uses.
DM DC 3 Taller Buildings	<p>PPG Design guidance applies, which states that buildings can be formed in many ways, for example tall towers, individual standalone units, long and low blocks, terraces. They can all be successful, or unsuccessful, depending on where they are placed, how they relate to their surroundings, their use and their architectural and design quality.</p> <p>Historic England Advice Note on Tall Buildings (Dec 2015)</p>	London Plan Policy 7.7 deals with the location and design of tall and large buildings. This policy requires boroughs to identify in their plans 'appropriate', 'sensitive' and 'inappropriate' locations for tall buildings. In addition, the policy sets out criteria for assessing when proposals would be unacceptable.	<ul style="list-style-type: none"> • Within Richmond Borough the character is predominantly low rise and even in Richmond and Twickenham taller buildings are of modest height compared to areas in Central London and other parts of London, such as Wandsworth or Croydon. • Borough's evidence base to address London Plan policy 7.7 is set out in the Borough-wide Sustainable Urban Development Study (2008); the study identifies: <ul style="list-style-type: none"> - taller' as being significantly taller than the neighbouring buildings, but less than 18 metres in height (below six storeys); - a 'tall' building as a building of 18 metres in height or higher; - The potential for 'tall' buildings is generally clustered close to Richmond and Twickenham train stations. - The centres of Richmond and Twickenham are areas where 'taller' buildings may be appropriate. - Higher densities could potentially be achieved in Whitton, East Sheen and Teddington centres. However, Whitton High Street is defined by predominately 3-storey terrace buildings and as such 'taller' buildings are unlikely to be appropriate. The majority of East Sheen centre is defined by predominately 3-storey terrace buildings, and in these areas 'taller buildings' would not be appropriate. Teddington centre is generally low-rise (i.e. 3-storeys) and the High Street is within a designated Conservation Area; therefore, opportunities for 'taller buildings' would be very limited and only considered in locations where there are currently existing 'tall'/'taller' buildings. - There are only very few sites outside of the above centres with existing 'tall' or 'taller' buildings, including Richmond College, Twickenham Rugby Stadium, Teddington Studios and Mortlake Brewery. Within these specific and exceptional sites, 'taller' or 'tall' buildings may be appropriate, subject to the criteria set out in this policy. - Elsewhere in the borough it is considered that 'taller' or 'tall' buildings are likely to be inappropriate and out of character with its historic context and local distinctiveness. 	<ul style="list-style-type: none"> • This policy has been taken forward as new Local Plan policy LP 2 Building Heights.

Review of Core Strategy and Development Management Plan policies, including assessment against national and regional guidance, local evidence and need, including justification for policy approach in Local Plan

Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Policy approach in Publication Local Plan
DM DC 4 Trees and Landscape	NPPF para 118 states that permission should be refused if development results in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.	London Plan policy 7.21 states that trees and woodlands should be protected, maintained, and enhanced. Existing trees of value should be retained and any loss as the result of development should be replaced. Wherever appropriate the planting of additional trees, should be included in new developments, particularly large-canopied species. Boroughs should develop appropriate policies to implement their borough tree strategy. Guidance for boroughs to prepare their own tree strategies is contained within the Borough Tree and Woodland Strategies SPG (2013) .	<ul style="list-style-type: none"> Trees are a valuable asset within our landscape, enhancing the borough's character and appearance, supporting a rich biodiversity and providing multiple ecosystem services and contributing to improving air quality. There is a need to consider specific requirements for relevant development proposals in areas of deficiencies in the number of trees, including using Planning Obligations to provide for trees off-site where appropriate. Need to ensure multiple benefits of trees are realised and therefore linked with other policy areas including air quality, climate change (reducing the urban heat island effect, carbon sequestration etc.), flood risk management, traffic calming, health and wellbeing. There is also a need to retain large canopy trees wherever possible and ensure development is designed and constructed in a way that is not detrimental to the health and longevity of retained specimens. Although, a balance is needed when considering residential properties and the reasonable enjoyment of outdoor space. Richmond Council's Tree Management Policy 	<ul style="list-style-type: none"> This policy has been taken forward as part of new Policy LP 16 Trees, Woodlands and Landscape.
DM DC 5 Neighbourliness, Sunlighting and Daylighting	NPPF (para 17) refers to securing a good standard of amenity for existing and future occupants. PPG <ul style="list-style-type: none"> Design guidance Guidance on light pollution 	London Plan policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing. The Mayor of London Housing SPG (2016) sets out standards for privacy, daylight and sunlight.	<ul style="list-style-type: none"> Need to protect adjoining properties from unreasonable loss of privacy, visual intrusion, pollution, noise, disturbance and overshadowing, and enable sufficient sunlight and daylight to penetrate into and between buildings. Need to define unneighbourly, overbearing, overlooking, habitable rooms, outlook, private view and other common terminology that is used to describe potential impacts on amenity and living conditions. There is a need to manage residents' expectations and set out clearly on what grounds an application may be refused. Policy refers to Building Research Establishment (BRE) tests in relation to site layout planning for daylight and sunlight – these should be clarified. Adding balconies retrospectively is usually unacceptable on grounds of unneighbourliness and loss of privacy. Residential Development Standards SPD (2010) Housing Optional Technical Standards update (2015) 	<ul style="list-style-type: none"> This policy has been taken forward as part of new Policy LP 8 Amenity and Living Conditions.
DM DC 6 Balconies and Upper Floor Terraces	No specific national guidance although para 17 refers to securing a good standard of amenity for existing and future occupants.	The Mayor of London Housing SPG (2016) provides details on requirements for private open space, including minimum depth and width for all balconies.	Adding balconies to existing developments is generally unacceptable on neighbourliness and privacy grounds, whereas new builds with purpose built, well designed and positioned balconies or terraces can add valuable private open space to residential units are on upper floors.	<ul style="list-style-type: none"> This policy has been incorporated into new Policy LP 8 Amenity and Living Conditions.
DM DC 7 Shop fronts and shop signs	No specific national guidance although some guidance on design quality may apply	No specific regional guidance	<ul style="list-style-type: none"> Need to ensure shop fronts are of high architectural quality that contribute to the character and appearance of the local area Need to retain shop fronts that have an important historic interest Shopfronts SPD (2010) <p>Shop-front guidance is also contained within the Village Planning Guidance SPDs:</p> <ul style="list-style-type: none"> Kew (2014) Whitton and Heathfield (2014) Mortlake (2015) Barnes (2015) East Sheen (2015) St Margarets (2016) Richmond and Richmond Hill (2016) East Twickenham (2016) <p>Village Planning Guidance SPDs in progress: Hampton, Hampton Hill, Teddington and Hampton Wick; Rolling programme to be continued into 2017, including for Twickenham and Strawberry Hill</p>	<ul style="list-style-type: none"> This policy has been incorporated into new Policy LP 1 on Local Character and Design Quality.

Review of Core Strategy and Development Management Plan policies, including assessment against national and regional guidance, local evidence and need, including justification for policy approach in Local Plan

Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Policy approach in Publication Local Plan
DM DC 8 Advertisements and Hoardings	<p>The Town and Country Planning (Control of Advertisements) (England) Regulations 2007</p> <p>The NPPF (para 67) states that control over outdoor advertisements should be efficient, effective and simple in concept and operation. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.</p> <p>The PPG contains detailed guidance on advertisements:</p> <ol style="list-style-type: none"> 1. Definition of an advertisement 2. Requirements for consent 3. Applications for express consent – procedure 4. Applications for express consent – determination, appeals, modification and revocation 5. Additional restrictions on the display of advertisements 6. Enforcement against specific unauthorised advertisements 7. Considerations affecting public safety 8. Considerations affecting amenity 	No specific regional guidance	<ul style="list-style-type: none"> • Need to protect character of buildings, streets and local areas from hoardings and other advertisements that could demonstrably harm the local amenity, public and highway safety. <p>Design guidance is also contained within the Village Planning Guidance SPDs:</p> <ul style="list-style-type: none"> • Kew (2014) • Whitton and Heathfield (2014) • Mortlake (2015) • Barnes (2015) • East Sheen (2015) • St Margarets (2016) • Richmond and Richmond Hill (2016) • East Twickenham (2016) <p>Village Planning Guidance SPDs in progress: Hampton, Hampton Hill, Teddington and Hampton Wick; Rolling programme to be continued into 2017, including for Twickenham and Strawberry Hill</p> <ul style="list-style-type: none"> • Shopfronts SPD (2010) 	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 1 on Local Character and Design Quality.
DM DC 9 Planning Application Checklist	<p>Para 193 of the NPPF states that local planning authorities should publish a list of their information requirements for applications, which should be proportionate to the nature and scale of development proposals and reviewed on a frequent basis.</p> <p>The PPG sets out guidance on local validation requirements. Information requested with a particular planning application must meet the statutory tests as set out in section 62 (4A) of the Town and Country Planning Act 1990 (inserted by the Growth and Infrastructure Act) and article 11(3)(c) of the Town and Country Planning (Development Management Procedure) (England) (Order) 2015.</p>	No specific regional guidance	The Council adopted a Local Validation Checklist in April 2015, with amendments made in September 2015.	No policy guidance required.
Tele-communications	Chapter 5 of the NPPF (i.e. paras 42-46) relates to supporting high quality communications infrastructure; Local Plans should support the expansion of electronic communication networks, including	No specific regional guidance	The majority of works relating to the installation, alteration or replacement of telecommunications infrastructure in this borough is carried out under permitted development rights. However, the provision of new infrastructure, including masts and road side cabinets, could be harmful to the character of an area and they have the potential to contribute to street clutter and impact visual amenity.	<ul style="list-style-type: none"> • Specific policy guidance has been developed and is taken forward as new Local Plan policy LP 33 Telecommunications.

Review of Core Strategy and Development Management Plan policies, including assessment against national and regional guidance, local evidence and need, including justification for policy approach in Local Plan

Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Policy approach in Publication Local Plan
	<p>telecommunications and high speed broadband.</p> <p>General Permitted Development Order 2015 (as amended)</p> <p>International Commission on Non-ionising Radiation Protection guidelines</p>		<p>Telecommunications SPD (2006)</p>	
CP8 Town and Local Centres	<p>This policy is considered to be in general conformity with the NPPF.</p> <p>See NPPF core planning principles (paras 17 – 19) as well as paras 23-27. In particular para 26 relates to impact assessments and allows for the introduction of a locally set floorspace threshold.</p> <p>NPPG includes details on impact and sequential tests</p>	<p>London Plan key policies 2.15 & 2.16, including para 2.75 & Annex 2 relating to the network of centres with designations for 5 main centres in the borough, and identifies Richmond as potential Outer London Development Centre for leisure, tourism, arts, culture and sports .</p> <p>Policy 4.6 relates to the support for and enhancement of arts, culture, sport and entertainment.</p> <p>Policy 4.7 covers retail and town centre development; it states that the scale of development should relate to size and function of the centre and includes guidance on sequential and impact tests.</p> <p>Policy 4.8 relates to supporting the retail sector.</p> <p>Town Centre's SPG (2014)</p> <p>London-wide evidence and research:</p> <ul style="list-style-type: none"> Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (2013) 2013 London Town Centre Health Check Analysis Report (2014) Accommodating Growth in Town Centres (2014) London Small Shops Study and Addendum (2010) 	<ul style="list-style-type: none"> Consultants Nathaniel Lichfield and Partners were commissioned by the Council to produce a retail study, which was published in 2014. The Study estimates a modest need to increase floorspace for retail (Use Class A1) and the food and drink sector (Use Classes A3, A4 and A5) over the plan period, much of which will be focused in Richmond main centre. The Study also took account of anticipated changes in patterns in retail and shopping, including the rise of online shopping. See NLP Retail Study (and Appendices) (2014). The Council published town centre health checks in 2013, and land uses in all centres are surveyed annually. The data suggests that centres in the borough are generally healthy with vacancy rates well below the national average. In establishing the hierarchy the Council took into account the Mayor's Town Centre Network, analysis of the health of centres and the forecasts of retail need. See Town Centre Health Checks (2013). <p>Authority's Monitoring Report:</p> <ul style="list-style-type: none"> Council's Annual Town Centre Land Use Survey <p>Other research:</p> <ul style="list-style-type: none"> Distribution of Convenience Provision (good spread of food shopping across the borough and most residents have access to it within walking distance) Analysis of town & Local Centres <p>The spatial strategy whose aim is to steer major development into the 5 main centres remains relevant. Development elsewhere in the centres will be appropriate to the scale and function of the centre.</p> <p>There is an ability to consider a locally set threshold (in line with guidance set out in the NPPF) that is appropriate for this borough to be able to assess the impacts of a proposal on existing, committed and planned investments in a centre/centres within the catchment area and to ensure the impacts of a proposal on a centre's vitality and viability are understood.</p> <p>There is a need to expand the hierarchy of centres table by including a list of the local parades of importance (it should be noted that these are local parades of importance to the local people and communities; they are not small parades of shops of purely neighbourhood significance, which are, in line with the NPPF Annex 2, excluded from the main centres definition).</p> <p>The Village Planning process has highlighted the importance of centres and parades to borough residents. This should be incorporated into new policy guidance.</p>	<ul style="list-style-type: none"> The main elements of the existing policy have been incorporated into the new overarching Policy on the borough centres, i.e. LP 25 Development in Centres.
DM TC 1 Larger Town Centres	<p>This policy is considered to be in general conformity with the NPPF.</p> <p>See NPPF core planning principles (paras 17 – 19) as well as paras 23-27.</p>	<p>London Plan policy 2.15 sets out the role of centres in hierarchy.</p>	<p>There is a need to implement the spatial strategy by steering major development into main centres.</p> <p>See local evidence and research under CP8 above.</p>	<ul style="list-style-type: none"> The main elements of the existing policy have been incorporated into the new overarching Policy on the borough centres, i.e. LP 25 Development in Centres.

Review of Core Strategy and Development Management Plan policies, including assessment against national and regional guidance, local evidence and need, including justification for policy approach in Local Plan

Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Policy approach in Publication Local Plan
	PPG on ensuring the Vitality of Town Centres includes details on impact and sequential tests			
DM TC 2 Local and Neighbourhood Centres and Areas of Mixed Use	This policy is considered to be in general conformity with the NPPF (paras 17-19). In particular, para 70 states that policies should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community.	London Plan policy 2.15 sets out the role of centres in hierarchy.	There is a need to manage development in smaller centres below district level. See local evidence and research under CP8 above.	<ul style="list-style-type: none"> The main elements of the existing policy have been incorporated into the new overarching Policy on the borough centres, i.e. LP 25 Development in Centres.
DM TC 3 Retail Frontages	This policy is considered to be in general conformity with the NPPF. Para 23 relates to defining the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and sets out policies that make clear which uses will be permitted in such locations. Para 70 requires the protection of valuable local services including shops. Para 157 states that Local Plans should identify areas where it may be necessary to limit freedom to change the use of buildings (supported by clear explanation)	London Plan policy 2.15 states that local authorities should include primary and secondary shopping frontages; specifically criterion d (c) of the policy states where there is surplus retail floorspace, consider scope for consolidating them, promote diversification particularly through high density, residential-led / mixed-use development and/or flexibility for non-A1 uses in secondary shopping frontage policies. In addition, para 2.72H states that when considering 'prior approvals' for conversion of individual retail units to housing, boroughs should ensure that housing provision does not compromise comprehensive town centre redevelopment; this requires consistent interpretation of 'key shopping areas' as meaning those parts of town centres defined in Local Plans as primary shopping areas, primary and secondary frontages, and neighbourhood and more local centres. <u>Town Centre's SPG</u> (2014), of particular relevance are: <ul style="list-style-type: none"> para 2.2.4-5 relating to active frontages paras 2.2.21 and 2.2.22 relating to ground floor residential uses in town centres Para 3.2.8 relating to support for essential shopping (including fresh food) 	<u>NLP Retail Study (and Appendices)</u> (2014): <ul style="list-style-type: none"> need for modest growth in retail floorspace over the plan period, much of which is to be focussed in Richmond main centre anticipated growth in floorspace in the food & drink sector <u>Town Centre Health Checks</u> (2013): <ul style="list-style-type: none"> generally healthy town centres Richmond in particular retains a strong demand for retail <u>Authority's Monitoring Report:</u> <ul style="list-style-type: none"> Council's Annual Town Centre Land Use Survey Other research: <ul style="list-style-type: none"> <u>Distribution of Convenience Provision</u> (good spread of food shopping across the borough and most residents have access to it within walking distance) <u>Analysis of town & Local Centres</u> <u>Authority's Monitoring Report</u> An Article 4 Direction was made in March 2016 to remove the permitted development rights for change of use from shops (Use Class A1) to financial and professional services (Use Class A2). This will come into effect on 1 April 2017.	<ul style="list-style-type: none"> This policy has been taken forward as new Policy LP 26 Retail Frontages.
DM TC 4 Local Shops, Services and Public Houses	This policy is considered to be in general conformity with the NPPF, specifically, para 70 requires the protection of valuable local services including shops.	London Plan policy 4.8 specifically states boroughs should maintain, manage and enhance local and neighbourhood shopping and facilities which provide local goods and services; boroughs should develop policies to prevent the loss of retail and related facilities that provide essential convenience and specialist shopping or valued local community assets,	Need to protect isolated facilities and public houses within reasonable walking distance. Research into access to local food shopping has been published. It concluded that there is generally a good spread of food shopping across the borough. Some of this essentially top-up shopping provision is located in small centres and local parades and is both vital to and valued by local residents. However, it identified that there are some areas which are more than 400 metres from local food shops. Pubs are valued community facilities. Each year there are new	<ul style="list-style-type: none"> This policy has been taken forward as new Policy LP 27 Local Shops, Services and Public Houses.

Review of Core Strategy and Development Management Plan policies, including assessment against national and regional guidance, local evidence and need, including justification for policy approach in Local Plan

Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Policy approach in Publication Local Plan
		including public houses, justified by robust evidence. 2013 Town Centre's SPG (2014), in particular paras 1.2.19-1.2.21 in relation to protecting pubs	applications for change of uses from pubs to other uses, mostly residential use. Also see local evidence and research under CP8 above.	
DM TC 5 The Evening Economy	This policy is considered to be in general conformity with the NPPF, specifically, para 70 requires the protection of valuable local services including shops. No national guidance on evening economy re over-concentration or mitigation measures.	London Plan policy 4.6 supports the enhancement of arts, culture, sport and entertainment. It states that boroughs should identify, manage and co-ordinate strategic and more local clusters of evening and night time entertainment activities to (1) address need, (2) provide public transport, policing and environmental services; and (3) minimise impact on other land uses taking account of the cumulative effects of night time uses and saturation levels beyond which they have unacceptable impacts on the environmental standards befitting a world city and quality of life for local residents. In addition, boroughs should manage cumulative impacts and encourage a diverse range of night time activities. 2013 Town Centre's SPG (2014), Section 1.2 and Appendix A	<ul style="list-style-type: none"> • Town Centre Health Checks (2013) covered diversity of uses and analysis of anti-social behaviour • Approach of restricting uses in areas where over-concentration is already established in policy (TC 3, subsection D) • Richmond Council's Licensing Policy and the designated cumulative impact zones (CIZs) for Richmond and Twickenham centres does not fully align with planning designations 	<ul style="list-style-type: none"> • Elements of this policy have been incorporated into the overarching Policy on the borough centres, i.e. LP 25 Development in Centres, as well as new Policy LP 26 Retail Frontages. • In addition, new Policy LP 8 Amenity and Living Conditions is also relevant.
CP9 Twickenham Town Centre	Twickenham Town Centre AAP will not be reviewed.	N/A	N/A	NA
Green Belt Statement	Statement to say that the Council relies on CP10, London Plan and national policy guidance with regard to Green Belt.	London Plan Policy 7.16 Green Belt	N/A	<ul style="list-style-type: none"> • The new Policy LP 13 is titled Green Belt, Metropolitan Open Land and Local Green space, and it emphasises that the same level of protection is applied in all the designations.
DM OS 2 Metropolitan Open Land	The policy guidance of paragraphs 79-92 of the NPPF on Green Belts applies equally to Metropolitan Open Land (MOL).	London Plan policy 7.17: The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.	<ul style="list-style-type: none"> • Richmond has extensive designated MOL which makes up around 60% (3054 ha) of the borough's area including Richmond Park, Bushy Park, Hampton Court Palace and Kew Gardens. • LBRuT Open Space Assessment Report (April 2015) • Open Land Review (2006) • LBRUT Infrastructure Delivery Plan (2012) • Authority's Monitoring Report 	<ul style="list-style-type: none"> • The new Policy LP 13 is titled Green Belt, Metropolitan Open Land and Local Green space, and it emphasises that the same level of protection is applied in these designations. It sets out appropriate uses and exceptions that may be considered in these areas of strong protection.
DM OS 3 Other Open Land of Townscape Importance	Planning Practice Guidance on Local Green Space Designation - a way to provide special protection against development for green areas of particular importance to local communities	Policy 7.18 Protecting Open Space and addressing deficiency	<ul style="list-style-type: none"> • There are just over 160 sites designated as OOLTI in the borough. • LBRuT Open Space Assessment Report (April 2015) • Open Land Review (2006) • LBRUT Infrastructure Delivery Plan (2012) • Authority's Monitoring Report 	<ul style="list-style-type: none"> • This policy has been taken forward as part of the new Policy LP 14.
DM OS 6 Public Open Space	NPPF paras 73 and 74: Access to high quality open spaces and opportunities for sport and recreation	London Plan policy 7.18: The Mayor supports the creation of new open space in London to ensure satisfactory levels of local	LBRuT Open Space Assessment Report (April 2015): There are 200 sites (527 hectares) identified in the Borough as open space provision.	<ul style="list-style-type: none"> • This policy has been taken forward as part of the new Policy LP 31 Public Open

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Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Policy approach in Publication Local Plan
	can make an important contribution to the health and well-being of communities. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless certain criteria are met.	provision to address areas of deficiency. Table 7.2 categorises types of public open space by size.	83% of all open spaces score above the thresholds set for quality, reflecting the generally excellent standard of sites. 98% of all open spaces are assessed as being above the threshold for value, a reflection towards the importance of open space provision in providing social, environmental and health benefits. Anecdotal evidence suggests that requirements for open space sometimes overlap with requirements for play space. Authority's Monitoring Report	Space, Play Space, Sport and Recreation, which also incorporates children's and young people's play facilities.
DM OS 7 Children's and Young People's Play Facilities	Para 73: high quality open spaces and opportunities for sport and recreation make important contribution to health and well-being of communities.	Policy 7.1: Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people's lives, and should meet the principles of lifetime neighbourhoods Shaping Neighbourhoods: Play and Informal Recreation SPG (2012) - provides guidance on the appropriate level of provision for play and informal recreational space in developments based on updated child yield calculations.	The LBRuT Open Space Assessment Report April 2015 demonstrates that there is generally a very good spread of provision across the borough, and the majority of sites (95%) have been assessed as being of very high quality. There are no gaps in play provision in the borough as there are 44 dedicated sites with play areas, of which 42 sites rate above quality threshold. Planning Obligations SPD (2014) Appendix 1 sets out the methodology for calculating and assessing the child occupancy and subsequent place space requirements for a development site in this borough.	<ul style="list-style-type: none"> This policy has been taken forward as part of the new Policy LP 31 Public Open Space, Play Space, Sport and Recreation, which also incorporates children's and young people's play facilities.
DM OS 8 Sport and Recreation Facilities	NPPF paras 73 and 74: opportunities for sport and recreation make important contribution to health and well-being of communities. Existing sports and recreational buildings and land, including playing fields, should not be built on unless certain criteria are met. PPG: Local planning authorities are required to consult Sport England where development affects the use of land as playing fields.	London Plan policy 3.19: no net loss of sports and recreation facilities, including playing fields; temporary facilities may provide the means of mitigating any loss as part of proposals for permanent re-provision. Encourage multi-use public facilities. Provision of sports lighting where there is identified need and subject to criteria.	Need to protect public and private sports grounds including playing fields and recreational areas, courts and greens as well as private open space in recreational use. The Borough Open Space, Sport and Recreation Needs and Opportunities Assessments set out the strategy for the borough's sport facilities, open spaces, recreational facilities, playing pitches, playing fields and play space up to 2025: <ul style="list-style-type: none"> Playing Pitch Strategy May 2015 Playing Pitch Strategy Assessment Report May 2015 LBRuT Indoor Sports Facility Needs Assessment May 2015 LBRuT Open Space Assessment Report April 2015 LBRUT Infrastructure Delivery Plan (2012) assesses future need for different types of infrastructure, including sport and recreation facilities. IDP will need to be updated to take account of Playing Pitch Strategy and Indoor Sports Facility Needs Assessment. The Planning Obligations SPD (2014) sets out requirements for provision of open space	<ul style="list-style-type: none"> This policy has been taken forward as part of the new Policy LP 31 Public Open Space, Play Space, Sport and Recreation, which also incorporates children's and young people's play facilities.
DM OS 9 Floodlighting	No specific national guidance	London Plan policy 3.19: Provision of sports lighting should be supported in areas where there is an identified need for sports facilities to increase sports participation opportunities, unless the sports lighting gives rise to demonstrable harm to local community or biodiversity.	Need to ensure there is no demonstrable harm to biodiversity, residential amenity or local character; need for policy criteria to enable applicants/officers to consider the benefits and impacts of floodlighting provision. The LBRuT Playing Pitch Strategy May 2015 identifies the need for floodlighting to maximise winter play for tennis and to meet demand for training provision for rugby, in appropriate locations and in accordance with DMP policies.	<ul style="list-style-type: none"> This policy has been taken forward as part of the new Policy LP 9 Floodlighting.
DM OS 10 Allotments and	No specific national guidance	London Plan policy 7.22: Boroughs should protect existing allotments and identify other	LBRuT Open Space Assessment Report (April 2015) - There are 24 allotment sites in the Borough (28.22 hectares). This meets the recommended standard of The	<ul style="list-style-type: none"> This policy has been incorporated into new Policy

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other food growing spaces		potential spaces that could be used for commercial food production or for community gardening.	National Society of Allotment and Leisure Gardeners (NSALG). However long waiting lists (approx. 5 years) and much unmet demand for allotment spaces remain across the borough.	LP 18, and it recognises that allotments would be highly unlikely to become surplus to requirements.
CP11 River Thames Corridor	Policy is considered to be in line with national guidance although it is noted that there is no specific guidance or policies that would apply to the river corridors.	Policy is in general conformity with London Plan Blue Ribbon Network policies 7.24 – 7.30; in particular policy 7.29 River Thames. All London Green Grid SPG (2012) Arcadian Thames Area Framework – All London Green Grid (2012)	<ul style="list-style-type: none"> • Need to protect and enhance the natural and built environment and unique historic landscape of the River Thames corridor (as designated in the Proposals Map as Thames Policy Area), including its biodiversity and access to the river. • Need to protect and encourage river related industries. • Need to take account of the relevant strategies relating to the River Thames: <ul style="list-style-type: none"> - Thames Landscape Strategy (2012) - Thames Strategy – Kew to Chelsea • Need to ensure that the aims and guidance from the Water Framework Directive is reflected in the policy. • Need to balance the requirements to provide access to and alongside the river whilst at the same time protecting its biodiversity. • Need to ensure that Environment Agency’s buffer zones are clearly reflected in the policy. • Need to be specific in relation to the provision of access to and alongside the river, and make it clear whether access is required for the general public or for the Environment Agency for maintenance. • Need to ensure that the requirement for a public footpath alongside the River Thames, including access to it, is clearly set out in the policy. 	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 18 River Corridors.
DM OS 11 Thames Policy Area	No specific national guidance	Policy is in general conformity with London Plan Blue Ribbon Network policies 7.24 – 7.30, in particular policy 7.29 relating to the River Thames and the Thames Policy Area, which states that development within this area should be consistent with the published Thames Strategy for the particular stretch of river concerned. Actions and planning priorities as identified in the Thames Strategies should be reflected in the borough’s plans.	<ul style="list-style-type: none"> • Need to identify the Thames Policy Area in line with regional policy guidance. • Need to ensure development protects and enhance the special character of the River Thames as set out in the: <ul style="list-style-type: none"> - Thames Landscape Strategy (2012) - Thames Strategy – Kew to Chelsea • There is no specific need to provide detailed design guidance for the Thames Policy Area. 	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 18 River Corridors.
DM OS 12 Riverside Uses	No specific national guidance	Policy is in general conformity with London Plan Policy 7.27 Blue Ribbon Network – supporting infrastructure and recreational use, which states that development proposals that result in the loss of existing facilities for waterborne sport and leisure should be refused, unless suitable replacement facilities are provided.	<ul style="list-style-type: none"> • Assessment of Boatyard Facilities on the River Thames (2007, GLA) • Need to protect river-dependent and river-related uses, including river-related industry (B2) and locally important wharves, boat building sheds and boatyards and other riverside facilities such as slipways, docks, jetties, piers and stairs. 	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 18 River Corridors.
DM OS 13 Moorings and Floating Structures	No specific national guidance	Policy is in general conformity with London Plan Blue Ribbon Network policies 7.24 – 7.30, in particular with Policy 7.27 Blue Ribbon Network – supporting infrastructure and recreational use, which states that the Blue Ribbon Network should not be used as an extension of the developable land in London nor should parts of it be a continuous line of moored craft.	<ul style="list-style-type: none"> • Assessment of Boatyard Facilities on the River Thames (2007, GLA) report by Adams Hendry Consulting Ltd • Need to ensure any proposals for houseboats, moorings and other floating structures safeguard the character and openness of the River Thames. • Note that the London Borough of Richmond has introduced a new Moorings Byelaw that came into effect on 13 March 2015 	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 19 Moorings and Floating Structures.
CP12 River Crane Corridor	Policy is considered to be in line with national guidance although it is noted that there is no specific guidance or policies that would apply	Policy is in general conformity with London Plan Blue Ribbon Network policies 7.24 – 7.30; in particular policy 7.29 River Thames.	<ul style="list-style-type: none"> • Need to protect and improve the Crane corridor, including its biodiversity and access to the river. • Need to balance the requirement to provide access to the river whilst protecting its biodiversity at the same time. 	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 18, which is the overarching policy on River

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	to the river corridors.	All London Green Grid SPG (2012) River Colne and Crane Area Framework – All London Green Grid (2012)	<ul style="list-style-type: none"> • Need to be specific in relation to the provision of access to and alongside the river, and make it clear whether access is required for the general public or for the Environment Agency for maintenance. • Need to ensure that developments adjacent to the River Crane to contribute to environmental improvements. • Need to ensure that the aims and guidance from the Water Framework Directive is reflected in the policy. • Need to ensure that Environment Agency’s buffer zones are clearly reflected in the policy. • Crane Valley Planning Guidelines SPG (2005) – the SPG specifically relates to the following four development sites in Twickenham: <ul style="list-style-type: none"> • Former Post Office Sorting Office • Richmond College, including the playing fields • Harlequins Rugby Ground (the Stoop) • Central Depot, Craneford Way <p>The main purpose of the SPG is to provide guidance for developers on these sites. The SPG was produced in support of the Unitary Development Plan (2005), which is now largely superseded by other Local Plan documents. The UDP established the 'River Crane Area of Opportunity', and this was taken forward into the Core Strategy (2009). In light of the terminology used in the London Plan relating to 'opportunity areas', and given the All London Green Grid SPG and Framework for the River Colne and Crane Area, the River Crane Area of Opportunity designation should not be taken forward as part of the Local Plan review.</p>	<p>Corridors.</p> <ul style="list-style-type: none"> • It was carefully considered to retain a separate policy for the River Crane, but this was not thought to be appropriate as otherwise there would have been a need to include separate policies for all other rivers in the borough. • The River Crane corridor policy has been successfully applied over the years and development sites are still underway. The policy specifically refers and lists the various developments, which are expected to continue making contributions to improving the river corridor.
<p>CP5 – Sustainable Travel 5.A Reduce the need for travel and focus on network of town centres</p>	<p>The policy is considered to be in line with national guidance (NPPF, para 38), which states that high transport generating development should be in sustainable locations.</p>	<p>The policy is considered to be in line with the London Plan (Policy 6.1), which encourages patterns and nodes of development that reduce the need to travel, especially by car, and which supports development that generates high levels of trips at locations with high PTAL.</p>	<ul style="list-style-type: none"> • LBRuT Local Implementation Plan for Transport (LIP) sets out local and borough wide programme of measures and schemes, and provides transport context for borough • LBRUT Infrastructure Delivery Plan (2012) (IDP) provides an analysis of existing infrastructure provision and identifies any existing shortfalls, future requirements and an indication of potential costs and funding sources • Need for higher trip generating development to be located within areas easily accessible to transport opportunities other than the private car. • Authority’s Monitoring Report • The Council will produce a SPD on Sustainable Transport Choices. 	<ul style="list-style-type: none"> • Overarching and combined policy guidance has been developed as part of new Policy LP 44 Sustainable Travel Choices
<p>DM TP 1 Matching Development to Transport Capacity</p>	<p>The policy is considered to be in line with national guidance (NPPF, para 38), which states that high transport generating development should be in sustainable locations, where the need to travel will be minimised.</p>	<p>The Policy is considered to be in line with the London Plan (Policy 6.1), which supports development that generates high level of trips at locations with high levels of public transport accessibility and/or capacity. In addition, policy 6.3 requires developments to be phased where there are no firm plans for an increase in capacity to cater for the development. The cumulative impacts of development on transport requirements must be taken into account.</p>	<ul style="list-style-type: none"> • LBRuT Local Implementation Plan for Transport (LIP) sets out local and borough wide programme of measures and schemes, and provides transport context for borough • LBRUT Infrastructure Delivery Plan (2012) (IDP) provides an analysis of existing infrastructure provision and identifies any existing shortfalls, future requirements and an indication of potential costs and funding sources • Need for higher trip generating development to be located within areas easily accessible transport other than the private car. • The Council will produce a SPD on Sustainable Transport Choices. 	<ul style="list-style-type: none"> • Overarching and combined policy guidance has been developed as part of new Policy LP 44 Sustainable Travel Choices; this includes guidance previously contained in DM TP 1.
<p>DM TP 2 Transport and New Development</p>	<p>The policy is considered to be in line with national guidance (NPPF, paras 32 and 36), which states that developments should be supported by a Transport Assessment or Statement, and that a Travel Plan is required for developments who generate a significant amount of</p>	<p>The policy is in line with London Plan Policy 6.3 which states that development proposals should ensure that impacts on transport capacity and the transport network, at both corridor and local level, are fully assessed.</p>	<ul style="list-style-type: none"> • LBRuT Local Implementation Plan for Transport (LIP) sets out local and borough wide programme of measures and schemes, and provides transport context for borough • LBRUT Infrastructure Delivery Plan (2012) (IDP) provides an analysis of existing infrastructure provision and identifies any existing shortfalls, future requirements and an indication of potential costs and funding sources <p>There is a need to set out requirements for assessing potential impacts of new</p>	<ul style="list-style-type: none"> • Overarching and combined policy guidance has been developed as part of new Policy LP 44 Sustainable Travel Choices; this includes guidance previously contained in DM TP 2.

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	movement.		development on the transport network by requiring: <ul style="list-style-type: none"> • Transport Assessments for major developments • Transport Statements for smaller developments These requirements are also set out in the Local Validation Checklist (2015). The Council will produce a SPD on Sustainable Transport Choices, which will set out detailed requirements for the production of Transport Assessments and Transport Statements.	
CP5 – Sustainable Travel 5.B Land for transport	This policy is in line with the NPPF (paras 31 and 41), which state that routes that are critical in developing infrastructure to widen transport choice should be protected, and authorities should work with neighbouring boroughs on infrastructure such as rail freight interchanges.	London Plan (Policy 6.1) sets out strategic schemes and proposals for London; of relevance to Richmond Borough are: <ul style="list-style-type: none"> • Crossrail 2, London Overground, Southwest London Ten-car capability • Bus network development and bus stop accessibility programme • Cycling: Quietways, Greenways, Biking Boroughs, Mini-Hollands, Cycle Superhubs at rail and tube stations, Cycle to School partnerships, Cycle Parking • Enhanced urban realm and pedestrian environment • Enhanced safety features improving safety for all road users including the implementation of Dutch style roundabouts, early start traffic signal technology etc. London Plan (Policy 6.2) requires the provision of sufficient land for the development of an expanded transport system and development proposals that do not provide adequate safeguarding should be refused.	<ul style="list-style-type: none"> • LBRuT Local Implementation Plan for Transport (LIP) sets out local and borough wide programme of measures and schemes, and provides transport context for borough • LBRUT Infrastructure Delivery Plan (2012) (IDP) provides an analysis of existing infrastructure provision and identifies any existing shortfalls, future requirements and an indication of potential costs and funding sources. • The Council will produce a SPD on Sustainable Transport Choices. 	<ul style="list-style-type: none"> • Overarching and combined policy guidance has been developed as part of new Policy LP 44 Sustainable Travel Choices; this includes guidance policy guidance on safeguarding of routes and facilities, which states that land required for proposed transport schemes as identified in the London Plan and the Council's Local Implementation Plan for Transport will be protected from developments which would prevent their proper implementation.
CP5 – Sustainable Travel 5.C Cycling and Walking	The NPPF (para 35) states that plans should protect and exploit opportunities for the use of sustainable modes of transport, including giving priority to pedestrian and cycle movements.	London Plan policy 6.9 (Cycling) sets out specific requirements for developments to provide secure, convenient and accessible cycle parking facilities in line with London Plan standards or higher, provide on-site changing facilities and showers for cyclists, contribute positively to an integrated cycling network through infrastructure provision and facilitate the Mayor's Cycle Hire scheme; this also includes identifying, promoting and facilitating the completion of cycle routes. London Plan policy 6.10 (Walking) requires boroughs to maintain and promote the Walk London Network, identify / implement routes to town centres, transport nodes, promote Legible London, ensure developments improve pedestrian amenity and encourage a higher quality pedestrian environment, including use of shared spare principles.	Richmond borough has one of the highest modal shares for cycling in outer London, so it is important that borough policy continues to support cycling A Richmond Cycling Strategy is being drafted, which will include the proposed network of cycle routes. The Borough's current cycle parking standards vary in comparison to the London Plan standards – some exceed, some fall below so there is a need to rationalise these. The London Cycle Hire Scheme has not yet reached Richmond, but this may be expanded in future, so the policy needs to be sufficiently flexible in this regard. There are three Walk London routes running through the borough – the Thames Path, the Capital Ring and the London Outer Orbital Path (LOOP). Where appropriate, improvements and contributions from developments could be sought. LBRuT Local Implementation Plan for Transport (LIP) LBRUT Infrastructure Delivery Plan (2012) (IDP) The Council will produce a SPD on Sustainable Transport Choices.	<ul style="list-style-type: none"> • Overarching and combined policy guidance has been developed as part of new Policy LP 44 Sustainable Travel Choices; this includes specific guidance on cycling and walking.

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Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Policy approach in Publication Local Plan
DM TP 6 Walking and the Pedestrian Environment	The NPPF (para 35) states that plans should protect and exploit opportunities for the use of sustainable modes of transport, including giving priority to pedestrian and cycle movements.	London Plan policy 6.10 (Walking) requires boroughs to maintain and promote the Walk London Network, identify / implement routes to town centres, transport nodes, promote Legible London, ensure developments improve pedestrian amenity and encourage a higher quality pedestrian environment, including use of shared space principles.	There are three Walk London routes running through the borough – the Thames Path, the Capital Ring and the London Outer Orbital Path (LOOP). Where appropriate, improvements and contributions from developments could be sought. LBRuT Local Implementation Plan for Transport (LIP) LBRUT Infrastructure Delivery Plan (2012) (IDP) The Council will produce a SPD on Sustainable Transport Choices.	<ul style="list-style-type: none"> Overarching and combined policy guidance has been developed as part of new Policy LP 44 Sustainable Travel Choices; this includes specific guidance on walking.
DM TP 7 Cycling	The NPPF (para 35) states that plans should protect and exploit opportunities for the use of sustainable modes of transport, including giving priority to pedestrian and cycle movements.	London Plan policy 6.9 (Cycling) sets out specific requirements for developments to provide secure, convenient and accessible cycle parking facilities in line with London Plan standards or higher, provide on-site changing facilities and showers for cyclists, contribute positively to an integrated cycling network through infrastructure provision and facilitate the Mayor's Cycle Hire scheme; this also includes identifying, promoting and facilitating the completion of cycle routes.	Richmond borough has one of the highest modal shares for cycling in outer London, so it is important that borough policy continues to support cycling A Richmond Cycling Strategy is being drafted, which will include the proposed network of cycle routes. The Borough's current cycle parking standards vary in comparison to the London Plan standards – some exceed, some fall below so there is a need to rationalise these. The London Cycle Hire Scheme has not yet reached Richmond, but this may be expanded in future, so the policy needs to be sufficiently flexible in this regard. LBRuT Local Implementation Plan for Transport (LIP) LBRUT Infrastructure Delivery Plan (2012) (IDP) The Council will produce a SPD on Sustainable Transport Choices.	<ul style="list-style-type: none"> Overarching and combined policy guidance has been developed as part of new Policy LP 44 Sustainable Travel Choices; this includes specific guidance on cycling.
CP5 – Sustainable Travel 5.D Public Transport	The NPPF (para 35) states that plans should protect and exploit opportunities for the use of sustainable modes of transport.	London Plan policy 6.7 promotes public transport, other sustainable means of transport and step-free access; boroughs should also promote bus and bus transit networks	There is a need to encourage and support the provision and use of sustainable modes of transport where possible. LBRuT Local Implementation Plan for Transport (LIP) LBRUT Infrastructure Delivery Plan (2012) (IDP) The Council will produce a SPD on Sustainable Transport Choices.	<ul style="list-style-type: none"> Overarching and combined policy guidance has been developed as part of new Policy LP 44 Sustainable Travel Choices; this includes specific guidance on public transport.
DM TP 3 Enhancing Transport Links	This policy is in line with the NPPF (paras 29, 32 and 35), which states that transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how to travel; giving general support to developments that encourage sustainable transport modes, and ensuring plans protect and exploit opportunities for the use of sustainable modes of transport.	London Plan policy 6.4 focuses on efficient and effective cross-boundary transport services, orbital rail links to support future development and regeneration, including strategic schemes such as High Speed, Crossrail, London Overground, Southwest Trains), improved access to Heathrow Airport from south London of relevance. It also states that local plans should identify development opportunities related to locations which will benefit from increased public transport accessibility.	There is a need for new developments to create or improve links to the wider transport network where appropriate as well as permeability through a site. Need to refer to the requirement for developments adjoining the River Thames to provide a public riverside walk (see River Thames policies). Need to ensure that new developments are not gated (also see Design policies). LBRuT Local Implementation Plan for Transport (LIP) LBRUT Infrastructure Delivery Plan (2012) (IDP) The Council will produce a SPD on Sustainable Transport Choices.	<ul style="list-style-type: none"> Overarching and combined policy guidance has been developed as part of new Policy LP 44 Sustainable Travel Choices; this includes specific guidance on enhancing transport links and public transport.
DM TP 4 Integration of different types of Transport and Interchange Facilities	No specific national guidance	London Plan policy 6.1 focuses on improving interchange, particularly around major rail and underground stations, especially enhancing connectivity in Outer London.	Need to ensure that developments improve the quality and connectivity of transport interchanges. LBRuT Local Implementation Plan for Transport (LIP) LBRUT Infrastructure Delivery Plan (2012) (IDP)	<ul style="list-style-type: none"> Overarching and combined policy guidance has been developed as part of new Policy LP 44 Sustainable Travel Choices; this includes specific guidance on

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				safeguarding of routes and facilities.
DM TP 5 Taxis and Private Hire Vehicles	No specific national guidance	No specific guidance in London Plan. The Mayor's Transport Strategy (2010) states that the Mayor will work with boroughs to support improvements to the taxi service.	The current policy largely focuses on the design, location and accessibility of taxi ranks including impacts on pedestrian movement and road safety.	<ul style="list-style-type: none"> Overarching and combined policy guidance has been developed as part of new Policy LP 44 Sustainable Travel Choices; this includes specific guidance on taxis and private hire vehicles.
CP5 – Sustainable Travel 5.E Congestion and Pollution	This policy is in line with para 30 of the NPPF, which encourages solutions that support reductions in greenhouse gas emissions and reductions in congestion.	London Plan policy 6.11 states that local plans and Local Implementation Plans (Transport) should take a coordinated approach to smoothing traffic flow and tackling congestion through implementation of the recommendations of the Roads Task Force report and a range of measures such as improvements to walking, cycling and public transport, travel planning advice, car sharing, more efficient freight movements.	<p>There is a need to manage traffic impacts that could lead to congestion and pollution, particularly as the whole of the borough is a designated Air Quality Management Area (AQMA), with a number of areas with particularly high levels of pollutants including in main centres and along key transport corridors.</p> <p>The Council will produce a SPD on Sustainable Transport Choices.</p>	<ul style="list-style-type: none"> Overarching and combined policy guidance has been developed as part of new Policy LP 44 Sustainable Travel Choices. In addition, new Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination sets out policy guidance on pollution.
CP5 – Sustainable Travel CP5.F Car Parking and travel	National guidance states that boroughs should only impose local parking standards where there is a clear and compelling justification to manage the local road network (see NPPF paras 39 and 40, including the Ministerial statement (March 2015).	<p>London Plan policy 6.13.</p> <p>Outer London Commission (4th Report) (2015): Residential Parking Standards recommendations:</p> <ul style="list-style-type: none"> greater flexibility to outer London PTALs 0-1 greater flexibility for limited parts of PTAL 2 based on criteria <p>Minor Alterations to the London Plan (2016) on parking standards; took forward and implemented the OLC recommendations</p>	<p>There is a need to maintain the borough's current parking standards as set out in Appendix 4 of the Development Management Plan to minimise the impacts on the local road network, street congestion and amenity.</p> <p>In reviewing the policy, account has to be taken of the:</p> <ul style="list-style-type: none"> Outer London Commission's report on Residential Parking Standards Minor Alterations to the London Plan in relation to parking standards, i.e. introducing more flexibility in PTALs 0-1 and in limited parts in PTAL 2 	<ul style="list-style-type: none"> This has been incorporated within new Policy LP 45 on Parking Standards and Services. Appendix 3 sets out the Council's parking standards, including cycle parking standards.
DM TP 8 Off Street Parking - Retention and New Provision	National guidance states that boroughs should only impose local parking standards where there is a clear and compelling justification to manage the local road network (see NPPF paras 39 and 40, including the Ministerial statement (March 2015).	<p>London Plan policy 6.13 sets out the London-wide maximum parking standards, promotes and encourages car sharing and car clubs, including disabled parking. It expects an appropriate balance to be struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use</p> <p>Outer London Commission (4th Report) (2015): Residential Parking Standards recommendations:</p> <ul style="list-style-type: none"> greater flexibility to outer London PTALs 0-1 greater flexibility for limited parts of PTAL 2 based on criteria <p>Minor Alterations to the London Plan (2016) on parking standards; took forward and implemented the OLC recommendations</p>	<p>There is a need to maintain the borough's current parking standards as set out in Appendix 4 of the Development Management Plan to minimise the impacts on the local road network, street congestion and amenity.</p> <p>In reviewing the policy, account has to be taken of the:</p> <ul style="list-style-type: none"> the fact that the Borough standards, although in general conformity, differ from the London Plan standards. Evidence will need to be prepared to justify the continuation of the Borough's parking standards. Outer London Commission's report on Residential Parking Standards. Minor Alterations to the London Plan in relation to parking standards, which introduced greater flexibility for residential parking standards in outer London in PTALs 0-1, and in limited parts in PTAL2. <p>The Council is in the process of developing research to inform the review of the local parking standards policy, which will be based on the following options:</p> <ul style="list-style-type: none"> the adopted London Plan standards, including the flexible approach in areas of PTALs 0-1, with limited parts in PTAL 2; the Council's current parking standards, as set out in the Development Management Plan; and new borough-wide parking standards, as informed by the research and analysis of options 	<ul style="list-style-type: none"> This has been incorporated within new Policy LP 45 on Parking Standards and Services. This also includes specific policy guidance on resisting the provision of front garden car parking.
DM TP 9 Forecourt	No specific national guidance	No specific guidance on forecourt parking,	<ul style="list-style-type: none"> The policy focuses largely on design of forecourt parking. 	<ul style="list-style-type: none"> This has been incorporated

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Parking	(general guidance on parking standards in NPPF paras 39 and 40, including within the Ministerial statement (March 2015).	although London Plan policy 6.13 expects an appropriate balance to be struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.	<ul style="list-style-type: none"> Front Garden and Other Off-Street Parking Standards SPD (2006) Village Planning Guidance (SPDs) also contain relevant guidance; adopted SPDs include: Kew (2014), Whitton and Heathfield (2014), Mortlake (2015), Barnes (2015), East Sheen (2015), St Margarets (2016), Richmond and Richmond Hill (2016) and East Twickenham (2016); In progress: Hampton, Hampton Hill, Teddington and Hampton Wick; Rolling programme to be continued into 2017, including for Twickenham and Strawberry Hill 	within new Policy LP 45 on Parking Standards and Services. This also includes specific policy guidance on resisting the provision of front garden car parking.
CP5 – Sustainable Travel 5.G Sustainable travel	The NPPF puts great importance on a transport system that balances in favour of sustainable transport modes, giving people a real choice about how to travel (para 29). It also sets out (para 35) that developments should accommodate the need for deliveries, prioritise pedestrians and cyclists and access to public transport, reduce conflicts, incorporate facilities for charging plug-in and other ultra-low emission vehicles and consider the needs of those with disabilities. Requirements for Transport Assessments, Statements and Travel plans are also set out in the NPPF (paras 32 and 36).	The Policy is considered to be in line with the London Plan (Policy 6.1), which encourages patterns and nodes of development that reduce the need to travel, especially by car, seeks to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand. The Blue Ribbon Network policies, particularly 7.25 and 7.26 encourage the increasing use of the Blue Ribbon Network for passengers, tourism and for freight transport.	<p>Need to ensure impacts of developments on the local road network are considered.</p> <p>LBRuT Local Implementation Plan for Transport (LIP)</p> <p>LBRUT Infrastructure Delivery Plan (2012) (IDP)</p> <p>The Council will produce a SPD on Sustainable Transport Choices.</p>	<ul style="list-style-type: none"> Overarching and combined policy guidance has been developed as part of new Policy LP 44 Sustainable Travel Choices. This includes a range of sustainable travel measures that were previously covered under CP 5, part G.
CP5 – Sustainable Travel 5.H Measures to minimise the impacts of Heathrow	<p>Generic national guidance on aviation and supporting infrastructure within paras 31 and 33 of the NPPF, including the guidance within the PPG on aviation as well as the Aviation Policy Framework (2013)</p> <p>A decision on airport expansion in south-eastern England is to be delayed until "at least October 2016", according to Transport Secretary Patrick McLoughlin (30 June 2016)</p>	The London Plan contains policy 6.6 on aviation, which also sets out that the Mayor strongly opposes any further expansion at Heathrow (mainly due to the adverse noise and air quality impacts).	<p>The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the following documents:</p> <ul style="list-style-type: none"> Community Plan 2016 - 2020: This recognises that air-craft noise is a very significant issue for many residents, having an impact on quality of life, health and education. Night flights are particularly intrusive. The Council is leading the local resistance to proposals to expand Heathrow airport and would like to see a permanent block on any expansion of the airport. As part of achieving the Community Plan's key priority "For a greener borough", the Council will oppose any expansion of Heathrow Airport and any changes to the existing arrangements which will have an adverse impact on the borough. Corporate Plan 2016-19: This sets out that the Council will take the lead from the community, who overwhelmingly voted against expansion of Heathrow Airport, and that we will work with other boroughs and influential parties to press the government to reject the 2015 Airport Commission report recommending a third runway at Heathrow. 	<ul style="list-style-type: none"> The introductory section to the Local Plan, paragraphs 2.1.16 and 2.1.17 specifically deal with Heathrow. There is no specific policy within the Local Plan that contains guidance 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 statement set out in paragraph 2.1.16 clearly set out the Council's position on Heathrow.
CP13 Opportunities for all (Tackling relative disadvantage)	<p>Policy considered to be in accordance with the NPPF which sets out requirement for using evidence base to assess locations of deprivation which may benefit from planned remedial action.</p> <p>NPPF para 161.</p>	<p>Policy considered to be in general conformity with the London Plan, as while there are no identified areas of regeneration in the borough, policies seek to tackle spatial concentrations of deprivation.</p> <p>Policies 3.1, 3.9 and 4.12.</p>	<p>The Areas of Disadvantage in the Core Strategy were identified from the Index of Multiple Deprivation 2004. This evidence was updated in 2010 and 2015. The areas identified remain fairly static, and while there are no areas in the borough ranked in the 10% most deprived areas, there are small pockets of deprivation across the borough.</p> <p>The Council's Uplift programme continues, to rejuvenate the Whitton, Hampton North, Barnes, Mortlake, Ham and Fulwell and Hampton Hill areas of the Borough, which local people say are in need of improvement. Heathfield is covered in Phase 2.</p>	<ul style="list-style-type: none"> The theme of the Core Strategy in terms of 'Opportunities for all' has been incorporated throughout the Plan. However, no specific policy guidance required.
CP14 Housing	Although delivering against London Plan target and identified five year	Delivering against London Plan (2015) target, which needs to be reflected in policy.	Authority's Monitoring Report AMR 2013/14 continued to identify sufficient five year housing land supply (a	<ul style="list-style-type: none"> This policy has been incorporated into new Policy

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	<p>supply, there is a need for an up to date SHMA to provide evidence in support of local policies.</p> <p>NPPF requires meeting full, objectively assessed needs for market and affordable housing in the housing market area, and to plan for a mix based on current and future demographic projections and the needs of different groups in the community.</p> <p>NPPF paras 47 to 49 and 50.</p> <p>Self-build and Custom Housebuilding (Register) Regulations 2016 - from 1 April 2016 the statutory duty under the 2015 Act to keep a register and to have regard to it came into force.</p> <p>The Housing & Planning Act introduces new duties in relation to Starter Homes and Custom and self-Build, awaiting subsequent Regulations that the Government need to bring into effect to set out further requirements for local authorities, which will clarify further details such as eligibility and exemptions. Proposed amendments to the NPPF on housing delivery. Further Custom and Self Build Regulations from 31 October 2016 include setting local eligibility criteria and for local authorities seeking exemption of the duty to grant sufficient development permissions to meet demand for self-building.</p> <p>The Housing & Planning Act removes the requirement in the Housing Act for a separate Gypsy and Traveller assessment, which can now be part of the general assessment of needs to include all people residing in or resorting to the district in caravans or houseboats.</p>	<p>Sets higher annual average housing supply monitoring targets 2015 – 2025 for the borough of 315 but with an expectation that this will be exceeded. Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets in order to close the gap between identified need and capacity, including in centres with good public transport accessibility and mixed use redevelopment. Informed by London-wide SHMA and SHLAA, the development of which the Council input into.</p> <p>Policies 3.3 and 3.4.</p> <p>Inspector's Report into the Further Alterations to the London Plan found other than fine tuning regarding local need relating to the size and type of property and tenure, there is no need for each Borough to duplicate the work done by the GLA and produce their own individual assessment of overall need. However, the Inspector found that that overall the Plan's strategy will not deliver sufficient homes to meet London's objectively assessed need and recommended an immediate review of the London Plan. The Review of the London Plan is scheduled to commence in 2016, with a draft Plan expected Autumn 2017 and adoption is anticipated in Autumn 2019.</p> <p>Mayor's Housing SPG (2016).</p>	<p>potential 1849 units over the 5 year period, which is 274 units more than the new London Plan target).</p> <p>AMR 2014/15 continued to identify sufficient five year housing land supply (a potential 2154 units over the next five years which is 579 units more than the new London Plan target.</p> <p>AMR 2015/16 (yet to be published) early analysis indicates in excess of 500 units have been completed which is well above the current London Plan target of 315 homes per annum.</p> <p>The London Plan and the London-wide SHMA treat London as a single housing market area for planning purposes. The SHMA (in context of London-wide SHMA and following the NPPG guidance) recognises that the borough's housing market is closely integrated with those in other West and South West London Boroughs, and also forms part of a wider London housing market that extends across the Capital and has strong links and inter-relationships into the Home Counties.</p> <p>The SHMA concludes that the unconstrained demographic-based need for housing in the borough is for around 1,047 dwellings per annum in the 2014 - 2033 period - linked to the GLA 12-year migration projection. This is at the bottom end of the range identified by the demographic projections but is consistent with past trends in population growth.</p> <p>The context of the borough and the needs of different groups in the community will have to be taken into account, including family housing, older people, students, international investment and foreign buyers. The SHMA provides evidence on needs for different types of homes. <i>Also as set out above under DMHO5.</i></p> <p>The Council's Self-build and Custom Housebuilding Register was set up in May 2016 and as at 31 October 2016 there were 319 individuals listed on the register and 2 associations. The SHMA provides evidence in relation to need for different types of homes.</p> <p>Village Plan consultation feedback raised in relation to options for housing choice, including opportunities for younger people to get on the housing ladder and downsizing for older people to smaller units.</p>	<p>LP 34 New Housing on overall new housing delivery.</p> <ul style="list-style-type: none"> The Council is in the process of assessing the implications of the Housing and Planning Act 2016 and forthcoming Regulations and guidance which is still awaited. New Policy LP 35 Housing Mix and Standards address unit mix and housing standards (internal and external space and inclusive access) for all housing types. New Policy LP 37 Housing Needs of Different Groups also addresses Gypsies & Travellers.
DM HO 1 Existing Housing (including conversions, reversions and non self-contained)	No specific national guidance.	<p>Policy considered to be in accordance with resisting the loss of existing housing.</p> <p>Policy 3.14.</p> <p>Mayor's Housing SPG (2016)</p>	<p>No specific local evidence, implementation through planning applications. The AMR identifies that in some parts of the borough the loss of existing dwellings has been increasing. Although the strategic dwelling requirement is being met there is a need to prevent losses which have a cumulative impact from even small sites.</p>	<ul style="list-style-type: none"> This policy has been incorporated into new Policy LP 38 Loss of Housing which includes a presumption against the loss of housing. The supporting text provides

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accommodation)				further guidance on the approach to reversions.
DM HO 2 Infill Development	No specific national guidance.	Policy considered to be in accordance with taking into account local context and character, design principles and public transport capacity, development should optimise housing output for different types of location within the relevant density range. Policies 3.3, 3.4 and 3.5. Mayor's Housing SPG (2016) .	No specific local evidence, implementation through planning applications.	<ul style="list-style-type: none"> This policy has been incorporated into new Policy LP 39 Infill, Backland and Backgarden Development which deals with infill and backland development.
DM HO 3 Backland Development	Policy considered to be in accordance with the NPPF which states policies can resist inappropriate development of residential gardens. NPPF para 53.	Policy considered to be in accordance, as states Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified. Policy 3.5. Mayor's Housing SPG (2016) .	No specific local evidence, implementation through planning applications. The AMR 2014/15 shows that proposals that represent garden development in recent years averages less than 5% of housing completions. Some larger back gardens have already been identified as Other Open Land of Townscape Importance to ensure they are protected.	<ul style="list-style-type: none"> This policy has been incorporated into new Policy LP 39 Infill, Backland and Backgarden Development which deals with infill and backland development.
DM HO 4 Housing Mix and Standards	Overall approach in accordance with NPPF, although needs updating to reflect national approach to space standards and inclusive access. NPPF para 17 fourth bullet secure good standard of amenity for existing and future occupants. NPPF para 57 plan for inclusive design. Optional nationally described space standard (March 2015). Part M Building Regulations updated 2015.	Policy overall approach in accordance with approach to quality and design of housing developments, although needs updating to reflect approach to national space standards and inclusive access in London. Policy 3.5 Housing Standards Minor Alterations to the London Plan (published March 2016) include updates to reflect nationally described space standard + encouraging minimum ceiling height, and inclusive access. Supported by London-wide need and viability evidence. Mayor's Housing SPG (2016) .	The SHMA identifies a need for a mix of unit sizes. Population change evidence points in particular to demand from families for housing in the borough. The SHMA identifies households with mobility problems and/or a physical disability can be expected to grow, in particular driven by the growing older population.	<ul style="list-style-type: none"> New Policy LP 35 Housing Mix and Standards address unit mix and housing standards (internal and external space and inclusive access) for all housing types.
DM HO 5 Housing to Meet Specific Community Needs	Planning policy for traveller sites (2015) requires up to date assessment of needs. Other national changes significantly affecting housing sector and funding for Registered Providers and potential impacts e.g. on homelessness. Further details in Housing & Planning Act.	Policy overall approach in accordance with promoting housing choice, including affordable housing, families, supported housing, older people, Private Rented Sector, student housing. The accommodation requirements of gypsies and travellers (including travelling show people) should be identified and addressed, with sites identified in line with national policy, in coordination with neighbouring boroughs and districts as appropriate. Policy 3.8	The SHMA provides evidence in relation to the housing needs of particular groups, including older people and students, which identifies the need to plan for a mix of housing to address local needs. Take account of housing strategies and evidence base, and Public Health and Commissioning information, including Extra Care Housing Evidence Base (2015) and Retirement Housing Review (2016) . Initial outcome of research on Gypsies and Travellers in 2013 and 2015 (published 2016) suggests that there is no demonstrated need for additional pitches; although there is a need to protect existing pitches. Anticipated impact on homelessness due to changes in funding for Registered Providers which may increase needs including for temporary accommodation, hostels.	<ul style="list-style-type: none"> This policy has been incorporated into new Policy LP 37 Housing Needs of Different Groups which also addresses Gypsies & Travellers.

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CP15 Affordable Housing	<p>Policy considered to be in accordance with overall approach to affordable housing.</p> <p>See also CP14 regarding NPPF requirement to for up to date assessment of affordable housing needs and plan for a mix.</p> <p>NPPF para 50 set policies for meeting affordable housing need on site, unless off-site provision or a financial contribution can be justified. Flexible to take account of changing market conditions.</p> <p>NPPF para 173 to ensure viability the costs of requirements such as affordable housing should provide competitive returns to a willing land owner and willing developer.</p> <p>NPPF definition of Affordable rented housing. Proposed amendments to the NPPF on housing delivery.</p> <p>Other national changes significantly affecting housing sector and funding for Registered Providers and potential impacts e.g. on homelessness. Further details in Housing & Planning Act.</p> <p>Secretary of State's Written Ministerial Statement (WMS) of 28 November 2014 and NPPG state contributions for affordable housing and tariff-style planning obligations should not be sought from small scale and self-build development, and Vacant Building Credit should be applied. Paragraph 10 of the NPPF states that Local Plans and decisions need to take local circumstances into account.</p>	<p>Mayor's Housing SPG (2016).</p> <p>Policy considered to be in accordance with overall approach to affordable housing, which seeks mixed and balanced communities and sets a numeric London-wide target for affordable housing delivery. The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use scheme</p> <p>Policies 3.9, 3.10, 3.11, 3.12 and 3.13.</p> <p>Mayor's Housing SPG (2016). An update is expected to be published late 2016 on Affordable Housing and Viability SPG to ensure effective policy implementation and increase affordable housing delivery.</p>	<p>In the period from 2014 to 2033 a net deficit of 964 affordable homes per annum is identified in the SHMA, demonstrating the need for affordable homes remains substantial and justifies the continued policy approach.</p> <p>The Council's 80/20 tenure split has been justified previously (i.e. 80% rented, 20% intermediate). The SHMA identifies this remains appropriate.</p> <p>Council's Tenancy Strategy (2013) (and DTZ report) sets guideline rent levels. University of Cambridge research on the private rented sector (2012) identifies strong PRS need.</p> <p>Intermediate Housing Policy Statement sets out approach to affordability of shared ownership.</p> <p>Affordable Housing Investment Framework for South West London (last updated 2010) covers borough tenure mix, unit size, supported housing needs.</p> <p>Analysis from the Housing Register e.g. current needs, affordability, is set out in the SHMA.</p> <p>Anticipated impact due to changes in funding for Registered Providers which may increase need for different intermediate type products for residents.</p> <p>AMR 2013/14 only 14% of units were delivered as affordable housing on-site against a target/aspiration of 50% as set out in the Core Strategy. Tenure split of 76% rented / 24% intermediate, which is only slightly below policy requirements.</p> <p>AMR 2014/15 only 2% of units were delivered as affordable, all rented units, overall a dramatic reduction from the improvement in recent years. Of the identified five year housing land supply, 904 units are from small sites and the supply of large sites fluctuates, in some years completions from large sites have fallen as low as 7%, therefore small site contributions are relied upon to meet affordable housing policy objectives. Identifies on average 147 net completions on small sites per annum.</p> <p>Financial contributions in lieu of on-site affordable housing are reported separately – see the Council's Authority Monitoring Report website.</p> <p>Local Validation Checklist (2016) requires information to satisfy affordable housing policy requirements to be submitted with an application.</p> <p>A report to the Council's Cabinet on 23 June 2016 (item 10, paragraphs 3.15 to 3.19) sets out the Council's exceptional local need and evidence base to require affordable housing contributions from all sites.</p> <p>Need to ensure continued viability of policy approach and a whole plan viability assessment for the Local Plan Review has been undertaken.</p>	<ul style="list-style-type: none"> This policy has been incorporated into new Policy LP 36 Affordable Housing. The Council is in the process of assessing the implications of the Housing and Planning Act 2016 and forthcoming Regulations and guidance which is still awaited. On seeking affordable housing contributions from small sites, recent appeal decisions have had regard to the WMS and NPPG as material considerations and given them great weight. However Inspectors have recognised the Councils local circumstances and reliance on contributions from small sites to meet local affordable housing need and given significant and substantial weight to the local evidence of affordable housing need. Viability is addressed within new Policy LP 36 Affordable Housing. A whole plan viability assessment for the Local Plan Review has been undertaken.
DM HO 6 Delivering Affordable Housing	As set out above under CP15.	As set out above under CP15.	As set out above under CP15.	<ul style="list-style-type: none"> This policy has been incorporated into new Policy LP 36 Affordable Housing as set out above under CP15.
CP16 Local Services / Infrastructure	Provision of social infrastructure is a key part of the 'social' dimension of sustainable development in the	London Plan policy 3.16: additional and enhanced social infrastructure provision is required to meet the needs of London's	LBRUT Infrastructure Delivery Plan (2012) assesses future need for different types of social infrastructure and potential funding sources.	<ul style="list-style-type: none"> The majority of this policy has been incorporated into new Policy LP 28 Social and

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	<p>NPPF which is about supporting strong, vibrant and healthy communities.</p> <p>One of the core planning principles of the NPPF is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs'</p> <p>Other relevant sections of NPPF:</p> <ul style="list-style-type: none"> - Section 8 Promoting Healthy Communities - Para 72 on school provision - Para 73 on recreation 	<p>growing and diverse population.</p> <p>Policy 3.18 and the Mayor's Social Infrastructure SPG (2015) advocate co-location across all social infrastructure types and particularly in relation to schools.</p> <p>HUDU Guidance on Community Infrastructure Planning</p> <p>Also London Plan policies 3.17 Health and Social Care facilities, 3.18 Education facilities and 3.19 Sports facilities.</p>	<p>Evidence from service providers indicates that there is an increasing need for schools and nurseries across the borough and that there is also pressure on health facilities.</p> <p>CIL Regulation 123 list prioritises funding for strategic transport, education facilities, community facilities, parks and open spaces projects, waste facilities, and sport and leisure provision.</p> <p>Planning obligations SPD (2014)</p> <p>Richmond upon Thames Community Plan 2016 - 2020.</p> <p>Council School Place Planning Strategy (2015) provides evidence that more school places are required to meet longer-term forecast demand, particularly in the primary phase.</p> <p>The pressure on nursery places is likely to be intensified by the Government's recent provision of 30 hours of free childcare for 3 and 4 year olds with working parents, which will come into effect from September 2017. It is very important that all existing community facilities are protected and that if a community use ceases on a particular site, every opportunity is taken to re-use that site for an alternative social or community infrastructure use.</p> <p>The Borough Open Space, Sport and Recreation Needs and Opportunities Assessments set out the strategy for the borough's sport facilities, open spaces, recreational facilities, playing pitches, playing fields and play space up to 2025:</p> <ul style="list-style-type: none"> • Playing Pitch Strategy May 2015 • Playing Pitch Strategy Assessment Report May 2015 • LBRuT Indoor Sports Facility Needs Assessment May 2015 • LBRuT Open Space Assessment Report April 2015 	<p>Community Infrastructure.</p>
<p>DM SI 1 Encouraging New Social Infrastructure Provision</p>	<p>As above (CP16); in addition NPPF para 70: plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.</p>	<p>London Plan policy 3.16: Development proposals which provide high quality social infrastructure will be supported; Facilities should be accessible to all sections of the community; The multiple uses of premises should be encouraged.</p> <p>Mayor's Social Infrastructure SPG (2015)</p> <p>Also relevant: LP Policies 3.17, 3.18 and 3.19.</p>	<p>As above (CP16)</p>	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 28 Social and Community Infrastructure. • Because major developments will impact on existing social infrastructure provision, a requirement has been introduced for applications for 10 units or more to assess the potential impacts on existing social infrastructure.
<p>DM SI 2 Loss of Existing Social Infrastructure Provision</p>	<p>As above (CP16); in addition NPPF para 70: guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.</p>	<p>London Plan policy 3.16: Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted.</p> <p>Policy 3.16 para 3.87A and the Mayor's Social Infrastructure SPG (2015) explain that loss of social infrastructure in areas of defined need may be acceptable if it can be demonstrated that the disposal of assets is part of an agreed programme of social</p>	<p>As above (CP16)</p> <p>The Council has a (statutory) duty to provide for certain social infrastructure uses (e.g. education, nursery provision etc.). This includes considering the impact of the additional 15 hours free nursery care (i.e. rising to 30 hours in total from September 2017) as set out in the Childcare Act 2016.</p>	<ul style="list-style-type: none"> • This policy has been incorporated into new Policy LP 28 Social and Community Infrastructure. • In recognition of the vital importance of social and community infrastructure facilities for local communities and the pressure on these sites, the requirement for reusing or redeveloping a site for alternative social

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		<p>infrastructure re-provision to ensure continued delivery of social infrastructure and related services, and in doing so responds to the need to rationalise property portfolios across the public estate. Also relevant: LP Policies 3.17, 3.18 and 3.19.</p>		<p>infrastructure provision has been strengthened by introducing a requirement for completion of a marketing exercise.</p>
<p>CP17 Health and well being</p>	<p>NPPF Section 8 'Promoting healthy communities' and PPG Section 8 as well as NPPF core planning principle (take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs)</p> <p>Other relevant NPPF sections include 4, 7 and 11.</p> <p>Marmot Review 'Fair Society, Healthy Lives' (2010) report – major study into tackling health inequalities.</p> <p>TCPA Guidance 'Reuniting health with planning' (2012) report and checklist and 'Planning healthy weight environments' (2014) report</p> <p>RTPI Planning Horizons Paper 'Promoting Healthy Cities' (2014)</p> <p>Dementia Friendly Environments Checklist</p> <p>Health and Social Care Act 2012: gives boroughs an enhanced role in improving public health in their areas, i.e. Health and Wellbeing Boards, JSNA and Joint Health and Wellbeing Strategies should inform plan-making.</p> <p>NHS England and Public Health England: Healthy New Towns initiative</p>	<p>London Plan policy 3.2: New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities</p> <p>Also relevant: Policies 3.1, 3.17 and 7.1</p> <p>Mayor's Social Infrastructure SPG (2015) particularly Ch5</p> <p>The London Health Inequalities Strategy (2010)</p> <p>Mayor's Best Practice Guidance on Health issues in Planning (2007)</p> <p>HUDU (London Healthy urban development unit) Guidance on 'Healthy Places and Communities' and HIA Tool</p> <p>GLA Takeaways Toolkit (2012) sets out the evidence that fast food takeaways are a contributing factor in the growth of the obesogenic environment and the rise of childhood obesity and other health problems.</p>	<p>LBRUT Joint Strategic Needs Assessment (JSNA) 2015/16 and Joint Health and Wellbeing Strategy 2013-16 suggest that there are clear health inequalities across the borough with life expectancy about 5 years lower for men and 4 years lower for women in the most deprived than in the least deprived areas of the borough; the estimated numbers of people in the borough with unhealthy lifestyles are substantial, for example, only 23% of residents use outdoor space for exercise or health reasons; and there are increasing numbers of people with multiple long term conditions. For example, nearly one in three people registered with a GP in the borough has one or more long-term condition(s) and nearly one in ten has three or more.</p> <p>The Borough Open Space, Sport and Recreation Needs and Opportunities Assessments set out the strategy for the borough's sport facilities, open spaces, recreational facilities, playing pitches, playing fields and play space up to 2025:</p> <ul style="list-style-type: none"> • Playing Pitch Strategy May 2015 • Playing Pitch Strategy Assessment Report May 2015 • LBRuT Indoor Sports Facility Needs Assessment May 2015 • LBRuT Open Space Assessment Report April 2015 <p>In terms of health infrastructure, there is a shortage of GP premises / floorspace across all areas of the borough. HUDU evidence showing capacity, shortfall and needs of GP Premises across the borough (not currently publicly available):</p> <ul style="list-style-type: none"> • Teddington & Hampton: 1,220m² GIA floorspace deficiency • Richmond, Ham & Kew: 1,105m² GIA floorspace deficiency • East Sheen & Barnes: 885m² GIA floorspace deficiency • Twickenham & Whitton: 750m² GIA floorspace deficiency <p>Mapping of health and social care facilities will be undertaken as part of the Council's Infrastructure Delivery Plan.</p> <p>The Richmond Clinical Commissioning Group (CCG) and NHS Property Services have produced an Estates Strategy which details the primary care, community care and office space owned by NHS Richmond.</p> <p>The Council's Local Validation Checklist (2016) requires Health Impact Assessments to be submitted for all major development proposals.</p> <p>Richmond upon Thames Community Plan 2016 - 2020. One of the key priorities is delivering a healthy borough.</p> <p><u>Takeaways and tackling obesity</u> The Richmond Joint Strategic Needs Assessment shows:</p> <ul style="list-style-type: none"> • 45% adults in the borough (approximately 65,000) are obese or overweight; • 18.1% of children in Reception year are obese or overweight; • 24.4% in Year 6 are obese or overweight; <p>To address this concern, The evidence therefore clearly suggests there is an emerging obesity issue in the</p>	<ul style="list-style-type: none"> • The detail from this policy about provision of health and social care facilities is now addressed under new Policy LP 28 Social Infrastructure. • The parts of this policy which promote a healthy built environment which encourages healthy lifestyles are included within new Policy LP 30 Health and Wellbeing and greater explanation is provided. • The requirement for a Health Impact Assessment to be submitted with major development proposals is now included within new Policy LP 30 Health and Wellbeing. • New policy LP 30 now considers specifically the needs of older people. • The restriction on development of new fast food takeaways within 400m of a primary or secondary school is now included within new Policy LP 30. A map showing the restriction zones is also included.

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			borough. In order to contribute towards tackling this issue, a restriction on the development of further fast food takeaways (A5 uses) in close proximity (i.e. within 400m walking distance) to schools is considered to be justified and based on local evidence and need. This policy approach has already been adopted in other London boroughs as well.	
CP18 Education and Training	NPPF para 72 refers to the need to make sufficient provision for a choice of school places to meet existing and new communities' needs. Great weight should be given to the need to create, expand or alter schools; and LPAs should work with schools promoters to identify and resolve key planning issues before applications are submitted.	London Plan policy 3.18: Local Plan to provide the framework for the regular assessment of need for pre-school, school, higher and further educations institutions and community learning facilities at local and sub-regional levels and secure sites for future provision recognising local needs and specific requirements. Support free schools and development proposals that address current and projected shortage of primary and secondary school places.	<ul style="list-style-type: none"> The Council's School Place Planning Strategy (2015) provides evidence that more school places are required to meet longer-term forecast demand, particularly in the primary phase. The most difficult school place planning area is St Margarets and North Twickenham / Twickenham Riverside where there is a need for up to three forms of entry at primary level. The Office of National Statistics predicts that the school age population within the borough will increase from 46,000 to 55,000 by 2024. A number of school expansion proposals are identified in the School Place Planning Strategy, which are also reflected and referred to in the Local Plan. The Richmond Children and Young People's Needs Assessment (September 2015) provides a useful summary of existing education provision in the borough. LBRUT Infrastructure Delivery Plan (2012) – assesses future need including education and potential funding sources. The IDP will need to be updated to reflect changes in education needs and priorities. <p><u>Early years and nurseries</u></p> <ul style="list-style-type: none"> Demand for free Early Years places in the borough is very high. Each of the maintained nurseries is oversubscribed. Richmond Childcare Sufficiency Assessment (2014) - The key areas of under-provision of nurseries and childcare in the borough are in Kew, Mortlake, Barnes and East Sheen where there is only 10% access to full day childcare. The extended free childcare entitlement for working parents of 3- and 4-year-olds, which provides eligible parents with a total of 30 hours of free childcare per week, will be a challenge for the Council. <p><u>Young People NEET</u> (Not in Education, Employment, or Training)</p> <ul style="list-style-type: none"> In 2014, 4.3% of 16-18 years olds were NEET which was slightly lower than the national average of 4.67% though greater than the London average of 3.4%. <p><u>Multi-use</u></p> <ul style="list-style-type: none"> Council's aspiration for multi-use / community use of school sites outside of term times / school hours 	<ul style="list-style-type: none"> This policy has been incorporated into new Policy LP 29. A new requirement has been introduced into Policy LP 29 stating that a Local Employment Agreement should be secured where more than 20 FTE jobs are created by a development. The Council has been working closely with the Education Funding Agency to deliver new schools. The policy now includes reference to the impacts of the changes to the way schools are developed and funded.
CP19 Local business	Policy considered to be in accordance with the NPPF, which prioritises economic growth and requires local planning authorities to proactively meet the development needs of businesses. See NPPF core planning principle as well as paras 19, 20 and 21	<p>Policy considered to be in general conformity with the London Plan, which promotes the development of a strong, diverse sustainable economy across all parts of London.</p> <p>See London Plan Policy 4.1, 4.2, 4.3 and 4.4, as well as GLA's London Office Policy Review (2012)</p> <p>The GLA's Industrial Land Supply and Economy Study (2015) demonstrates that the borough has a very limited supply of industrial land, with only 17.3 hectares of general and light industrial space (B2 and B1(c)), and 8.1 hectares of warehousing</p>	<ul style="list-style-type: none"> Limited employment land in the borough (see Employment Sites and Premises Study (2013)) Employment growth in the borough is expected, whereby demand for office space in the Borough is for 62,000sqm over the period 2011 to 2031 – note that this figure does not take account of losses due to prior approvals Lack of high quality offices as well as shortage of 'low-cost and simple space' Authority's Monitoring Report Loss of office space due to Permitted Development Rights (see Employment AMR 2014) is a major concern. Between May 2013 and October 2016, prior approvals for B1a to C3 PD rights could, if implemented, result in a total loss of 88,301m² of office floorspace, resulting in a potential 1,059 new dwellings. We have a high number of small business / self-employed / home workers in the borough There is also demand for space for businesses which are currently in serviced offices who want to expand Growth in the media sector is anticipated. 	<ul style="list-style-type: none"> This policy has been incorporated into new Policy LP 40 Employment and Local Economy. Separate policies for office and industrial land have also been introduced – LP 41 and LP 42. An update to the Council's Employment Land Study has been undertaken, which supports the stronger policy approaches to the protection of office space and industrial land.

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		<p>and storage (B8) facilities; this is amongst the lowest of all the London boroughs.</p> <p>The Mayor of London's Land for Industry and Transport SPG (2012) states that the London Borough of Richmond upon Thames should ensure a 'restrictive' approach towards the transfer of industrial land to other uses until 2031.</p>	<ul style="list-style-type: none"> All industrial land in the borough should be protected against release to non-employment uses (also consider against release to B1(a) office use) The Council's Assessment of Office Stock (2015) in the borough demonstrates the need for establishing and protecting Key Office Areas. The Council has identified existing industrial land and business parks, based on thorough evidence and research, as set out within the Council's borough-wide Assessment of Light Industrial and Storage Stock and Appendices. There is a need to introduce separate policies for office and industrial land, with stronger protection for both. The Employment Land Study update (2016) has been undertaken, which supports the policy approaches in the Local Plan. 	
DM EM 1 Development for Offices, Industrial, Storage and Distribution uses Policy	<p>Policy considered to be in accordance with the NPPF, which places significant weight on the need to support economic growth through the planning system and requires local planning authorities to support existing businesses and plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries.</p> <p>See NPPF paras 19, 20 and 21.</p>	<p>Policy considered to be in general conformity with the London Plan, which promotes the development of a strong, diverse sustainable economy across all parts of London, and enhances the environment and offer of London's offices.</p> <p>See London Plan Policy 4.1 and 4.2.</p> <p>GLA's Industrial Land Supply and Economy Study (2015)</p> <p>Mayor of London's Land for Industry and Transport SPG (2012)</p>	<ul style="list-style-type: none"> There were 74,200 employee jobs in the Borough (ONS 2013) which is 4.3% growth on the previous year Over 16% of the Borough's working-age residents are self-employed; approximately 60% higher than the self-employment rates for GB as a whole and 4% higher than London During the last financial year, almost a third of companies in Richmond have experienced growth in their turnover and almost a quarter have increased their headcount Employment floorspace provision may be the single most important constraint on future business and employment growth in Richmond borough Employment growth in the borough is expected; demand for office space in the Borough is for 62,000sqm over the period 2011 to 2031 – note that this figure does not take account of losses due to prior approvals Evidence suggests we need additional 'medium sized' offices. The 250sqm floorspace cited in policy text is still relevant. Also demand for 'studio' space and anticipated growth in the media sector. The Council's Assessment of Office Stock (2015) in the borough demonstrates the need for establishing and protecting Key Office Areas. The borough has a very limited supply of industrial floorspace and demand for this type of land is high in the borough. We have experienced pressure to redevelop industrial sites in recent years so stronger protection of these sites is required; this approach is supported by the Council's borough-wide Assessment of Light Industrial and Storage Stock and Appendices. Also see local evidence and research under CP 19 (above) 	<ul style="list-style-type: none"> Elements of this policy related to development of new office space have been incorporated into new policy LP 41 Offices. LP 41 encourages development of new flexible and co-working space to meet the needs in the borough and introduces a new requirement whereby affordable office space must be provided within all major developments with over 1000sqm of office space to address affordability issues, particularly for small business and the voluntary sector. Elements of this policy related to development of new industrial employment land have been incorporated into new policy LP 42 Industrial Land and Business Parks. LP 42 identifies 'locally important industrial land and business parks' where development of new industrial floorspace is encouraged. An update to the Council's Employment Land Study has been undertaken, which supports the stronger policy approaches to the protection of office space and industrial land.
DM EM 2 Retention of Employment	<p>Policy considered to be in accordance with the NPPF, which prioritises economic growth and requires local planning authorities to proactively meet the development needs of businesses. See NPPF core planning principle as well as paras 19, 20 and 21.</p>	<p>Policy considered to be in general conformity with the London Plan, which promotes the development of a strong, diverse sustainable economy across all parts of London, and enhances the environment and offer of London's offices.</p> <p>See London Plan Policy 4.2 and 4.4.</p>	<ul style="list-style-type: none"> Impacts of Permitted Development Rights (B1 offices to C3 residential): between May 2013 and October 2016, loss of 88,301m² of office floorspace has been approved which could, if implemented, result in a potential 1,059 new dwellings. Also see the Council's Employment AMR 2014, which demonstrates loss of employment/offices Authority's Monitoring Report To address the impacts of the Permitted Development Right, two sets of Article 4 Directions have been made and are in effect in various town centres and other parts of the borough to remove permitted development rights in order to 	<ul style="list-style-type: none"> Elements of this policy related to retention of office space have been incorporated into new policy LP 41 Offices. This policy introduces a presumption against loss of office floorspace in all parts of the borough and maintains the requirement for marketing

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	<p>British Council for Offices research demonstrates significant loss of office stock since May 2013.</p>	<p>The Mayor of London's Land for Industry and Transport SPG (2012) states that Richmond Borough should ensure a 'restrictive' approach towards the transfer of industrial land to other uses until 2031.</p> <p>The GLA's Industrial Land Supply and Economy Study (2015) demonstrates that the borough has a very limited supply of industrial land with only 17.3 hectares of general and light industrial space (B2 and B1(c) Use Classes) and 8.1 hectares of warehousing and storage facilities (B8 Use Class), amongst the lowest of all the London boroughs. The 'restrictive transfer' approach is unlikely to change within the next London Plan.</p>	<p>protect against further loss of this important resource. These Article 4 Directions have been supported by the Secretary of State as the Council produced strong evidence to justify their introduction, most recently the Council's Assessment of Office Stock (2015).</p> <ul style="list-style-type: none"> • Council's business survey (2015) shows that 1/5 of businesses have found it difficult to find the right premises; and during the last financial year (2014/15), almost a third of companies in Richmond borough have experienced growth in their turnover and almost a quarter have increased their headcount • All research confirms that there is limited employment land in the borough (see Employment Sites and Premises Study, 2013 and a high demand for quality office space as well as a shortage of 'low-cost and simple space'. • Borough-wide Employment Sites and Premises Study (2013) recommends that all industrial land in the borough is protected against release to non-employment uses • The borough has a very limited supply of industrial floorspace and demand for this type of land is high in the borough. We have experienced pressure to redevelop industrial sites in recent years so stronger protection of these sites is required, and this approach is supported in the update of the Council's Employment Land Study...There is an absolute requirement for strong protection and provision of new office and industrial space if the borough is to continue to offer local employment and opportunity to residents and businesses in the Borough. • The loss of floorspace could impact on greater commuting pressures, including out of the borough. 	<p>evidence and the sequential approach to redevelopment.</p> <ul style="list-style-type: none"> • Policy LP 41 also introduces a new designation for Key Office Areas. In these areas no net loss of office space is permitted. • Elements of this policy related to retention of industrial employment land have been incorporated into new policy LP 42 Industrial Land and Business Parks. This policy introduces a presumption against loss of industrial floorspace in all parts of the borough and a requirement for marketing evidence and a sequential approach. • Policy LP 42 also identifies 'locally important industrial land and business parks' where industrial land is given enhanced protection. In these areas loss of industrial floorspace will be resisted and introduction of non-industrial uses will also be resisted. • An update to the Council's Employment Land Study has been undertaken, which supports the stronger policy approaches to the protection of office space and industrial land.
<p>CP20 Visitors and Tourism</p>	<p>No specific national guidance</p> <p>Hotels are considered a town centre use. Therefore the NPPF requires that the needs for hotels are met in full in para 23.</p>	<p>London Plan policies 4.5 and 4.6</p> <p>London's Arcadia (identified on Map 4.2 of the London Plan and covering the majority of the borough) is identified as a strategic cultural area. London Plan identifies Richmond as potential Outer London Development Centre for leisure, tourism, arts, culture and sports.</p> <p>Richmond & Twickenham are identified as a night time cluster of strategic importance. Working Paper 58, GLA Economics, Understanding the demand for and supply of visitor accommodation in London to 2036 (2013)</p> <p>GLA 'An A-Z of Planning and Culture' (October 2015): a large area of Richmond borough is identified as a Strategic Cultural Area.</p>	<ul style="list-style-type: none"> • The London Tourism Action Plan 2009-2013 produced by the GLA identifies a potential additional room requirement for the borough of 300 serviced rooms (hotels, B&Bs and hostels), and a further 100 rooms of non-serviced accommodation. • Regional data on the supply of visitor accommodation was updated in 2012 showing that although the amount of accommodation has been increasing there will be a need for 42,900 serviced visitor rooms across the capital by 2036 • Richmond Borough Hotel Study (2012) by Roger Tym PBA, which will be kept under review, estimates a potential requirement of approximately 900 new bedrooms in the borough by 2026. • Tourist and visitor economy are important to London and to the Borough. • Cultural Partnership Strategy 2015-19 – A strategy developed to provide a framework for arts, culture and sport. 	<ul style="list-style-type: none"> • This has been taken forward as part of new LP 43 Visitor Economy.

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Other issues / requirements / new policy areas	NPPF and other relevant guidance	London Plan	Local evidence and need	Justification for policy approach in Publication Local Plan
Basements	<p>No national policy or guidance</p> <p>Other national legislation may apply such as:</p> <ul style="list-style-type: none"> • The Party Wall Act • The Highways Act • The Building Regulations • Environmental Pollution and Control legislation 	<p>No specific London Plan guidance, but Mayor's Sustainable Design and Construction SPG (2014) contains some guidance on basements and lightwells and The Control of Dust and Emissions during Construction and Demolition SPG (2014) may also be relevant</p>	<ul style="list-style-type: none"> • Residents' concerns particularly in Barnes but also some other areas such as Kew and Richmond • Council commissioned consultants in 2014 to undertake an independent review of the planning implications of basement developments and the options for the Council • Council's Good Practice Guide on Basement Developments: advice on planning as well as non-planning matters for developers/applicants and for neighbours/residents • New Local Validation Checklist (2015) with specific requirement for a Construction Management Statement for all basement applications and Structural Impact Assessments under or adjacent to listed buildings. • Updated House Extensions and External Alterations SPD, which now includes new sections on basements and lightwells. • New webpage on Basements providing guidance and advice for applicants and residents. 	<ul style="list-style-type: none"> • New policy guidance has been developed; see Policy LP 11 Subterranean developments and basements
Air quality	<p>The NPPF, para 124, states that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.</p> <p>The PPG states that Local Plans may need to consider:</p> <ul style="list-style-type: none"> • the potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments; • the impact of point sources of air pollution (pollution that originates from one place); and, • ways in which new development would be appropriate in locations where air quality is or is likely to be a concern and not give rise to unacceptable risks from pollution. 	<p>The London Plan, Policy 7.14 Improving Air Quality, states that boroughs should have policies that seek reductions in levels of pollutants and take account of the findings of their Air Quality Review and Assessments and Action Plans, in particular where Air Quality Management Areas have been designated.</p> <p>The Mayor's Sustainable Design and Construction SPG (2014) requires 'air quality neutral' developments, and exposure to poor air quality should be minimised and mitigated.</p> <p>The Mayor's Air Quality Strategy (2010) states that new developments should contribute to achievement of air quality objectives, minimise increased exposure to existing poor air quality, ensure air quality benefits are realised through developer contributions and mitigation measures are secured through planning conditions.</p>	<ul style="list-style-type: none"> • National policy guidance states that planning policies should comply with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. • Regional policy guidance states that boroughs should have policies that seek reductions in levels of pollutants and address the requirements of Air Quality Action Plans and Management Areas. • At a local level, there is a need to ensure development supports the borough's Air Quality Action Plan and address exceedances of poor air quality in relevant parts of the borough. • Need to assist in addressing exceedances of poor air quality in parts of the borough • Ensure development supports the borough's Air Quality Action Plan • Need to address local concerns and protect sensitive receptors, specifically around schools • Need local guidance in relation to commercial odours and fume control. • Need to ensure development supports the borough's Air Quality Action Plan and address exceedances of poor air quality in relevant parts of the borough. 	<ul style="list-style-type: none"> • A new overarching policy that deals with construction and pollution matters has been incorporated into the Local Plan. See new Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination, which sets out policy guidance on air pollution.
Noise pollution	<p>The NPPF states (para 109) that the planning system should contribute to and enhance environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.</p> <p>Policies should aim to (para 123):</p> <ul style="list-style-type: none"> • avoid noise from giving rise to <i>significant adverse impacts</i> on health and quality of life as a result of new 	<p>The London Plan policy 7.15 on reducing and managing noise states that boroughs should have policies to manage the impact of noise through the spatial distribution of noise making and noise sensitive uses.</p> <p>Some guidance is also contained within the Mayor's Sustainable Design and Construction SPG (2014)</p>	<ul style="list-style-type: none"> • National policy guidance states that policies should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; guidance also states that the Local Plan can include specific local noise standards to apply to various forms of proposed development and locations in their area. • Regional policy guidance states that boroughs should have policies to manage the impact of noise through the spatial distribution of noise making and noise sensitive uses. • At a local level, there is a need for policy guidance that provides more detail and clarity with regard to noise pollution (this relates to existing and future residents' living conditions as well as sensitive receptors such as hospitals and schools). The Council is also in the process of developing a specific SPD on Noise. 	<ul style="list-style-type: none"> • A new overarching policy that deals with construction and pollution matters has been incorporated into the Local Plan. See new Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination, which sets out policy guidance on noise pollution.

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	<p>development;</p> <ul style="list-style-type: none"> mitigate and reduce to minimum adverse impacts on health and quality of life arising from noise from new development, recognise that development will often create some noise existing businesses should not have unreasonable restrictions because of changes in nearby land uses identify and protect areas of tranquillity <p>Other national guidance:</p> <ul style="list-style-type: none"> PPG – the Local Plan can include specific local noise standards to apply to various forms of proposed development and locations in their area. Noise Policy Statement for England (NPSE), 2010 Noise Action Plan: Agglomerations, Defra, 2014 BS4142 Environmental Noise Directive (2002/49/EC) 		<ul style="list-style-type: none"> There is therefore a need for policy guidance that provides more detail and clarity with regard to noise pollution (this relates to existing and future residents' living conditions as well as sensitive receptors such as hospitals and schools). The Council is in the process of developing a specific SPD on Noise, which was subject to public consultation in the autumn 2016. 	
Light pollution	<p>No specific guidance on light pollution within the NPPF (except para 120 in relation to the effects of pollution on health, the natural environment or general amenity). The PPG contains light pollution guidance, including advice on how to consider the impact of artificial light within the planning agenda to avoid nuisance and ensure amenity.</p>	<p>No specific London Plan policy but some guidance within the Mayor's Sustainable Design and Construction SPG (2014):</p> <ul style="list-style-type: none"> types of light pollution; the potential harmful effects; and how to design lighting appropriately to minimise nuisance. 	<ul style="list-style-type: none"> There is no specific national policy on light pollution; however, there is national guidance on light pollution (as set out in the PPG), including advice on how to consider the impact of artificial light to avoid nuisance. There is no specific London Plan policy on light pollution although some guidance is contained within the Mayor's Sustainable Design and Construction SPG, including on types of light pollution, the potential harmful effects, and how to design lighting appropriately to minimise nuisance. At a local level, there is a need to specifically address light pollution in policy as this is now considered part of the statutory nuisance agenda relating to both existing and future residents' living conditions. There is therefore a need to specifically address light pollution in policy as this is now considered part of the statutory nuisance agenda relating to both existing and future residents' living conditions. 	<ul style="list-style-type: none"> A new overarching policy that deals with construction and pollution matters has been incorporated into the Local Plan. See new Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination, which sets out policy guidance on light pollution.
Land Contamination	<p>The NPPF (para 120) states that the effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.</p> <p>Detailed guidance is also contained</p>	<p>London Plan Policy 5.21 Contaminated Land states that boroughs should encourage the remediation of contaminated sites and set out policy to deal with contamination.</p> <p>Mayor's Sustainable Design and Construction SPG (2014) states that developers should set out how existing land contamination will be addressed prior to the commencement of their development. Potentially polluting uses are to incorporate suitable mitigation measures.</p>	<ul style="list-style-type: none"> National policy guidance states that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the applicant/developer and/or landowner. There is detailed national guidance on contamination (as set out in the PPG), which requires investigations of land potentially affected by contamination to be carried out in accordance with established procedures (such as BS10175 (2001) Code of Practice for the Investigation of Potentially Contaminated Sites). The minimum information that should be provided by an applicant is the report of a desk study and site reconnaissance. Regional policy guidance states that boroughs should encourage the remediation of contaminated sites and sets out policies to deal with contamination. In addition, the Mayor's Sustainable Design and Construction SPG states that applicants should set out how existing land 	<ul style="list-style-type: none"> A new overarching policy that deals with construction and pollution matters has been incorporated into the Local Plan. See new Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination, which sets out policy guidance on land contamination.

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Other issues / requirements / new policy areas	NPPF and other relevant guidance	London Plan	Local evidence and need	Justification for policy approach in Publication Local Plan
	<p>within the PPG, which states that site investigation information includes a risk assessment of land potentially affected by contamination, or ground stability and slope stability reports, as appropriate. All investigations of land potentially affected by contamination should be carried out in accordance with established procedures (such as BS10175 (2001) Code of Practice for the Investigation of Potentially Contaminated Sites). The minimum information that should be provided by an applicant is the report of a desk study and site reconnaissance. Part 2A of the Environmental Protection Act 1990, imposes responsibilities upon local authorities to deal with contaminated land.</p>		<p>contamination will be addressed prior to the commencement of development.</p> <ul style="list-style-type: none"> • At a local level, there is a need for a policy that provides more detail and clarity in relation to land contamination. • There is therefore a need for a policy that provides more detail and clarity in relation to land contamination. 	
Construction management	<p>No specific national guidance or policy but other national legislation may apply such as:</p> <ul style="list-style-type: none"> • The Highways Act • The Building Regulations • Environmental Pollution and Control legislation • BS5228 Control of Noise from Construction and Demolition Sites • Control of Pollution Act 1974 • Directive 97/68/EC • Non Road Mobile Machinery Regulations 2015 	<p>No specific London Plan policy but the The Control of Dust and Emissions during Construction and Demolition SPG (2014) outlines good practice for construction sites and controlling emissions including noise.</p>	<ul style="list-style-type: none"> • There is no specific national policy or guidance; however, other legislation does apply such as The Highways Act, The Building Regulations, Environmental Pollution and Control legislation, BS5228 Control of Noise from Construction and Demolition Sites, Control of Pollution Act 1974 etc. • There is no specific London Plan policy but the Control of Dust and Emissions during Construction and Demolition SPG outlines good practice for construction sites and controlling emissions including noise. • Issues of construction management are usually dealt with as part of a planning condition. • The Council adopted a Local Validation Checklist in April 2015, with amendments made in September 2015. This requires that all major applications as well as all applications for basement developments need to be supported by a Construction Management Statement. • There is a need to address the development stage and the impact upon local residents from noise, dust and fumes • Need to consider the impact upon congestion, road safety and vulnerable road users for larger developments • Need to consider the Construction Logistics' Agenda for certain road sensitive developments to deal with congestion and reduce impacts on air quality 	<ul style="list-style-type: none"> • A new overarching policy that deals with construction and pollution matters has been incorporated into the Local Plan. See new Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination, which sets out policy guidance on construction matters.
Minerals planning and aggregates	<p>NPPF, para 142 states that minerals “are essential to support sustainable economic growth and our quality of life”. Para 143 states that Local Plans should:</p> <ul style="list-style-type: none"> • identify and include policies for extraction of mineral resources • set out environmental criteria against which planning applications will be assessed <p>PPG includes extensive guidance on the planning for mineral extraction in plan making and the application process</p>	<p>London Plan policy 5.20 Aggregates states that mineral planning authorities in London should identify and safeguard aggregate resources in their local plans, and support the development of aggregate recycling facilities, subject to local amenity conditions.</p>	<p>Whilst the London Borough of Richmond upon Thames is the mineral planning authority for its area, there are no areas in the borough identified or expected to be identified for mineral extraction.</p> <p>LBRuT belongs to the London Aggregates Working Party. The London Plan only gives a minerals apportionment to four boroughs (which produce their own Local Aggregates Assessment (LAA)). The LAA 2014 has been produced by the Mayor, on behalf of the 29 boroughs that do not have land won minerals sites. No sites or wharves are identified within Richmond upon Thames.</p> <p>Policies DM OS 12 and DM TP 3 ensure that wharfs and railways sites respectively are safeguarded.</p>	<ul style="list-style-type: none"> • Whilst there is no specific policy in relation to minerals and aggregates, the Local Plan contains new Policy LP 24 Waste Management. • In addition, Policy LP 22 Sustainable Design and Construction seeks to ensure that all new development and refurbishment is as sustainable as possible; this includes minimising the consumption of resources during construction and occupation, and the policy encourages use of recycled or secondary aggregates in construction.