

**London Borough of Richmond upon Thames**

## **Planning Obligations Strategy**

Adopted as Supplementary Planning Guidance  
by Cabinet on 6<sup>th</sup> June 2005,  
following public consultation

# Planning Obligations Strategy

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# Section 1 Overall Strategy

## Introduction

1. This Strategy has been prepared to outline and clarify the London Borough of Richmond upon Thames' current approach, policies and procedures in respect of planning obligations. They would be taken forward through Section 106 agreements, which are typically agreements negotiated between local authorities and developers in the context of granting planning consent. They provide a means to ensure that a proposed development contributes to the creation of sustainable communities.

2. Obligations can be used to prescribe the nature of a development (e.g. by requiring that a given proportion of new homes are affordable); or to secure a contribution from a developer to compensate for loss or damage created by a development (e.g. loss of open space) or to mitigate a development's impact on the locality (e.g. towards the provision of necessary infrastructure and facilities such as through increased public transport provision). The outcome of all three of these uses of planning obligations should be that the proposed development concerned is made to comply as far as practicable with published local, regional or national planning policies.

3. Used properly, planning obligations can significantly increase the quality of development and secure benefits, which are capable of offsetting the impact of development and so make it acceptable.

4. Planning obligations are set out in legal agreements made under Section 106 of the Town and Country Planning Act 1990 whereby developers agree to undertake actions required by the local authority, or contribute in benefit or in kind towards measures necessary to make a scheme acceptable in planning terms. The role of planning in this regard is set out in PPS1:

"Planning authorities should seek to enhance the environment as part of development proposals. Significant adverse impacts should be avoided and alternative options, which might reduce or eliminate those impacts pursued. Where adverse impacts are unavoidable, planning authorities and developers should consider possible mitigation measures. Where adequate mitigation measures are not possible, compensatory measures may be appropriate. In line with the UK sustainable development strategy, environmental costs should fall on those who impose them - the 'polluter pays' principle." (Para 19.)

5. The government, in the Planning and Compulsory Purchase Act 2004, provides for reserve powers to replace 'planning obligations' with 'planning contributions'. These would operate in a similar way, but with the possibility of an optional fixed charge rather than negotiated agreements and with a requirement for local authorities to produce planning contributions policies on what would be sought and on what money would be spent, and to produce annual monitoring reports.

6. This is the planning obligations strategy for the Borough. It sets out what kinds of planning applications will require planning contributions and in broad terms how moneys will be spent on projects related to the development. Alongside this there are guidance notes on how contributions will be calculated in specific areas. These are:

2. Affordable Housing;
3. School Places;
4. Community Safety;
5. Health
6. The Public Realm, Open Space, and the Thames;
7. Transport.

7. The above priority areas are not exhaustive and the local authority may wish to negotiate other forms of

obligations depending on the individual circumstances of a site and proposal, where obligations are necessary, relevant and related to the proposal in question and meet the aims and requirements of the development plan. Such proposals might include temporary events at major visitor attractions, such as Hampton Court, Kew Gardens or Twickenham Stadium.

8. As Supplementary Planning Guidance adopted by the Council, the Strategy and accompanying subject area notes are material planning considerations to be used in the determination of planning applications. They will form the basis of discussions on individual planning applications with the aim of creating planning obligations, under Section 106 of the Town and Country Planning Act 1990 and the additional provisions of the Planning and Compulsory Purchase Act 2004. This strategy will be subject to regular review and will be developed alongside the Local Development Framework for the Borough with updates published accordingly.

9. The policy is designed to deliver on the three central government objectives for planning contributions of transparency, certainty and speed.

10. Circular 1/97 - Planning Obligations, notes that Planning Obligations have a positive role to play in the planning system and used properly can remedy genuine planning problems and enhance the quality of development. They can provide a means of reconciling the aims and interests of developers with the need to safeguard the local environment or to meet the costs imposed as a result of development, for example the full cost of essential community facilities required as a direct result of a proposed new development. Examples given in the Circular include new access roads, improved public transport accessibility and community facilities such as open space, social, educational or sporting facilities, provided they are related in scale and kind to the development proposed. The guidance suggests that to retain public confidence in the planning system, negotiations on planning obligations should be conducted in a way that is seen to be fair, open and reasonable. By adopting this approach the Council believes that planning obligations can enhance the quality of development and enable proposals to go ahead which might otherwise have been refused. The Courts have confirmed that this circular is guidance to which local planning authorities are required to have regard but that it is not binding upon them. All planning obligations will be negotiated and secured, treating Government policy as a material planning consideration.

11. The Government published in November 2004 a new draft Circular (to eventually replace Circular 1/97) which gives local planning authorities greater flexibility on framing policies, enabling more systematic approaches and pooling of contributions. In the meantime the Government will be working up in parallel proposals for a 'planning gain supplement', effectively a development land tax, arising from the Kate Barker review for the Treasury. This would tax the uplift in land values arising from granting of planning permission and subsequently local contributions would be 'scaled back'. The new tax would be likely to be collected and distributed centrally. In 2005, following the planning contributions pilots, the Government will decide on which system will replace the current Circular 1/97, whether to fully implement the requirements of the new Planning Act and/or to introduce the planning gain supplement.

12. This strategy does not just cover financial contributions but also benefits in kind negotiated as part of planning applications, including those delivered by negative conditions and other means, rather than only those confined to the legal planning obligations mechanism itself. In many cases provision in kind is preferable and suitable, especially where this reduces project management costs and/or where finding land for a facility is an issue. Where provision in kind is made, contributions will be secured for reasonable fitting out costs and to ensure that providers of community services necessitated by the development have facilities suitable for their needs and provided at nominal rents.

### **Richmond upon Thames Unitary Development Plan First Review**

13. The key policy in the Unitary Development Plan First Review is IMP3, which states:

Where it is necessary to make a proposal acceptable in land-use planning terms in accordance with the criteria in paragraph 7 of Circular 1/97, the Council will seek the provision of planning advantages appropriate to the site and commensurate with the scale and nature of the development. Planning advantages can comprise:

- a) improvements to the public transport system and interchanges, the footpath and cycle route network including access to the road system and rear servicing, public car parking and public cycle parking;
- b) provision of special benefits in terms of public buildings, open space and other facilities for public use such as recreation and community uses which help meet site or other Plan objectives;
- c) conservation of buildings (listed buildings and buildings of townscape merit) or places of historic or architectural interest or conservation areas or areas of nature conservation interest;
- d) provision of affordable or special needs housing;
- e) community facilities such as public conveniences (including provision for people with disabilities), childcare facilities or playspace, recycling facilities;
- f) provision of small industrial units;
- g) tourist information points;
- h) street furniture, landscaping and tree planting beyond the site boundary, and public works of art;
- i) provision of employment training schemes which develop the skills of Borough residents thus promoting employment opportunities and improved quality of life for residents;
- j) provision of buildings and/or facilities to satisfy the need for additional educational resources or public open space needs which the development may generate;
- k) contributions to meet the full costs of activity arising from the development and its implications for transportation and infrastructure including the need for parking and highway access, improved public transport and other facilities;
- l) other planning benefits for which there is a local need, for example environmental improvements to local shopping centres, housing and industrial estates, and closed circuit TV (CCTV).

### **London Plan Context**

14. Policy 6A.4 of the published London Plan on priorities in planning obligations states “The Mayor will and boroughs should reflect the policies of this plan and include strategic as well as local needs in their policies for, and negotiation of, planning obligations.” The policy goes on to state “ Affordable housing and public transport improvements should generally be given the highest importance with priority also given to learning and skills and health facilities and services and childcare provisions.”

15. Policy 6A.5 of the London Plan requires that “Boroughs should set out a clear framework for negotiations on planning obligations in UDPs having regard to central Government policy and guidance and local and strategic considerations (see Policy 6A.4) to the effect that:

- it will be a material consideration whether a development makes appropriate provision for, or contribution towards requirements that are made necessary by and are related to, the proposed development
- negotiations should seek a contribution towards the full cost of all such provision that is fairly and reasonably related in scale and in kind to the proposed development and its impact on the wider area
- boroughs should refer to planning obligations that will be sought in the relevant parts of the UDP (such as transport and housing policies).”

## **The Borough's Approach**

16. In the context of legislation, Government guidance and the Richmond upon Thames UDP First Review and the London Plan, the Council's approach to the negotiation of planning obligations is based on the following key principles:

17. The procedures will be operated in accordance with the fundamental principle that planning permission may not be bought or sold.

18. A planning obligation will only be sought when it is material to the planning decision on a proposal and where a particular planning obligation is required to make a development proposal acceptable in planning terms.

19. Planning obligations and national policy on planning obligations are material considerations to be taken into account when deciding planning applications, and it is for the London Borough of Richmond upon Thames, as local planning authority, to decide what weight should be attached to a particular material consideration.

20. Obligations will only be required having regard to national planning policy and the development plan (the Unitary Development Plan First Review and the London Plan) and other material planning considerations.

21. A planning obligation will not be sought to redress existing deficiencies or lack of capacity in existing facilities, services or infrastructures unless a proposal would materially worsen the deficiency to the extent that it would justify refusal of planning permission.

22. Development which is acceptable on land use planning and UDP policy grounds will not be refused because an applicant is unwilling or unable to offer unrelated benefits. Similarly contributions offered will not overcome problems with proposals that have significant design or other shortcomings. Any benefits offered by the developer may be a material planning consideration but this will not make a development to which there is fundamental planning objection.

23. When considering applications, the Council will consider whether planning conditions can adequately control all of the direct and indirect impacts of development and secure the desired planning benefits, before it decides that a planning obligation is necessary. There are many occasions when conditions can deal adequately with the provision of works or facilities outside the application site, by preventing the commencement or occupation of a development until the works or facilities in question have been provided (such conditions are often known as "Grampian conditions"). In those cases where planning obligations do not relate to payment of funds or provision of affordable housing then conditions may be applied requiring the completion of a scheme for mitigation prior to commencement of development (or equivalent arrangements), which could be fulfilled through entering into a planning obligation. In a Borough with a shortage of land, such as Richmond upon Thames, direct on-site provision and individually negotiated obligations should be considered the norm in many circumstances, especially for larger schemes.

24. Planning obligations should be seen as an integral component of securing a successful development. The nature of which planning obligations are likely to be required will be made known as early as possible in the planning process, preferably at pre-application stage, so that planning contributions are factored into the price of land and so do not harm development viability.

25. The overall extent of the planning obligation sought will have regard to what is reasonable in terms of the scale of the development, its impact and the requirements of the development plan.

26. The local planning authority will decide the acceptability of a development proposal on the balance of its planning merits, taking into account the planning application and whether the planning obligation, which has been negotiated as a whole is sufficient to overcome and satisfactorily address any impact arising from that proposal.

27. It is expected that the number and scope of planning obligations in the Borough will increase in part due to the Government's increased emphasis on them and in part due to the Borough's increased awareness, reflected in this strategy, of the impact of development on its area.

28. The Council will regularly monitor and publish results of the levels of contributions and sources of expenditure. Within the terms of the obligation it will return any moneys which in the event were not needed.

### **Qualifying Schemes**

29. Where the Unitary Development Plan First Review sets a threshold for the size of development below which contributions will not be sought this threshold will apply (e.g. on affordable housing) towards contributions towards that category only, otherwise the specific thresholds in the planning obligations strategy apply. For commercial schemes Gross Floor Area is used, as defined and calculated in the RICS code of measures practice.

### **Contributions Formula and Negotiated Schemes**

30. The Government announced to Parliament on the 30th January 2004 that it had changed its previous stance against formula or fixed rate contributions and is now consulting on a proposed revised draft of the Circular, which encourages local planning authorities to operate standard formulae and charges. The Council is setting out a full range of formulae to be applied in appropriate circumstances.

31. A more standardised approach has the advantage of greater transparency and predictability. This potentially could enable faster processing of smaller schemes and act as a starting point for negotiation on larger schemes.

32. In all cases Richmond upon Thames as the local planning authority retains the right to negotiate contributions above or below 'standard' levels where the site and/or scheme specific circumstances dictate this. Standard charges and a negotiated approach are not mutually exclusive choices. Standard charges act as a starting point but site and/or scheme specific circumstances may dictate a negotiated variation from the standard approach in an individual case.

33. Where schemes are subject to formal Environmental Assessment then initial discussions with the local planning authority on the scoping will include the likely impact of the development on existing and proposed social and community infrastructure, and what mitigation measures are proposed by developers to overcome identified deficiencies. The information held by the Borough, and benchmark impacts as set out in this strategy and its associated documents, should be used as a starting point for assessment.

34. Where it is possible to calculate this the costs are based on the capital costs of new provision, less committed Government expenditure, plus associated revenue costs over 10 years (the period until which additional population is reflected in the Borough's Standard Spending Assessment). Where there are access charges to new infrastructure, e.g. new electricity and water facilities, then these will be factored in to any analysis of viability. In those rare cases where new water or electricity facilities need to be created and these are borne by the first of a series of developments, then contribution levels need to be reduced pro rata, with the shortfall in contributions made up pro rata by later developments.

### **Timing of Payments**

35. The standard point of payment will be immediately on commencement of development, or sooner if infrastructure needs to be in place beforehand. This is to ensure that works, such as new open spaces and riverside walks, are available as the first residents move in, so that they are not effectively living on a building site and to ensure that infrastructure and facilities are available when they are needed.

## **How Moneys will be Spent**

36. Where a project is specifically necessary to overcome a planning objection then the planning obligation will tie expenditure, in the first instance, to that project. The theme specific guidance indicates how contributions will be allocated to specific identified schemes, e.g. a school extension. Many of these projects are identified in the Unitary Development Plan First Review, or other corporate documents such as the Open Spaces Strategy, and Conservation Area Studies. There will be need to be some flexibility over time to allow moneys to be spent on other than priority schemes if it is not practical to deliver the preferred scheme. In setting priority schemes regard will be had to relative need across the Borough.

37. It will not be practical to identify specific projects in every case, e.g. where implementation depends on future 'windfall' releases of land for affordable housing. The majority of developments may not, of themselves, warrant major investment in new infrastructure, services or facilities. For example, a development of five houses would be, on its own, of insufficient size to require an extension to a primary school or health centre. However, a series of small developments are likely to have a cumulative impact on existing infrastructure, services and facilities, and those responsible for their provision will find it more cost-effective to make a single improvement after a number of small developments have been built. In these cases the strategy indicates a number of broad priorities for different parts of the Borough, within the overall principle that the project on which moneys are spent is necessary, directly or indirectly, partially or wholly as a result of the scheme for which planning contributions are secured. In order to ensure that the cumulative effects of development are acknowledged, service providers (normally a department of the Council) will, in certain cases, create funds into which moneys sought from planning consents will be paid, which will be defrayed against the cost of additional infrastructure on a phased basis. In relevant cases, specific accounts will be established. These funds will be implemented as part of the Council's capital programme but will be in addition to, not instead of, mainstream funding.

## **Index Linking**

38. In order to maintain the value of contributions from the date of resolution to grant permission until the date that development is commenced, they will be index linked.

39. Building and construction costs do not follow the Retail Price Index (RPI) as they are determined more by the volume of work being carried out or in the pipeline at the time. The two price indices most commonly used to assess these costs are: the Building Cost Information Service (BCIS) published by the Royal Institution of Chartered Surveyors (RICS), and the Building Price & Cost Indices published by the Department of Trade & Industry (DTI). The BCIS gives a cost analysis of various types of buildings as well as forecasts of tender and building costs, and the DTI publication gives a series of indices of historic costs as well as future projections. The DTI Bulletin of Indices covers landscape maintenance costs. The Council will use the most appropriate of these two sets of indices to provide a guide to the construction and other costs of new infrastructure and facilities that are required. The Retail Price Index will be used for non-capital contributions.

## **Project Management and Monitoring Costs**

40. Developers will be expected to incur all legal costs associated with drawing up planning obligations.

41. Where a planning obligation is considered appropriate, the local planning authority will specify the use of contributions to ensure that they are applied towards provision or improvement of specific services, facilities and/or infrastructures. Where the obligation requires compliance checks, monitoring, project management and implementation through the Council and its service areas, then an appropriate project management cost not exceeding 5% (2% compliance and monitoring; 3% project management and implementation work) will be applied in addition to any standard fees incurred in implementation e.g. legal,

design and supervision costs, but no less than an index linked cost of £500 in any case. The project management cost will only be reduced or waived in exceptional circumstances if it can be shown that the monitoring and implementation costs are likely to be significantly less. Where planning obligations require significant public consultation, at application or implementation stage, the costs of this should be borne by the developer.

42. The design costs associated with some contributions, such as traffic schemes and architects fees, can be significant and can typically run at around 15%. These should either be directly undertaken by the developer or be included in the contribution.

### **Maintenance Costs**

43. New capital works, e.g. new children's playgrounds, may include a contribution towards the ongoing maintenance of the facility which reflects the time lag between the provision of the new facility and its inclusion in public sector funding stream in line with the draft revised planning obligations circular Para. 18 (in most cases for a ten year period.)

### **Disagreements between the Local Planning Authority and the Developer**

44. Legal agreements for planning obligations may contain arbitration clauses that set out how disagreements will be resolved.

### **Land Charges**

45. Applicants are reminded that obligations under Section 106 of the Town and Country Planning Act 1990 and Section 278 of the Highways Act 1980 have to be registered as local land charges. They will, therefore, have to deduce title to the site, and third parties, such as mortgagees, may have to be made party to the agreement.

### **Enabling Development and Mixed Use Schemes**

46. In certain cases proposals are justified as 'enabling development', which is development that would not normally be permitted but helps to finance or facilitate related activity, which is in the public interest. A typical case might be a housing project that permits the refurbishment of a listed building that might otherwise fall into permanent disrepair, or mixed use schemes where one land uses subsidises another. The Council will consider proposals of this nature on their merits and in line with guidance such as that issued by English Heritage, but will wish to assure itself through the imposition of a planning obligation that any related works will be carried out and may, in certain cases, seek a bond or other form of security.

### **Relative Priorities**

47. First priority will be given to essential works necessary to prepare the site for development and make it safe and secure essential transport works. Where it is not possible to secure contributions at the desired level across all fields then priority will be given to contributions which would relieve the greatest planning problems and to affordable housing.

### **Development Briefs**

48. In the case of larger sites, development briefs will be used to provide the opportunity to facilitate acceptable schemes and this will enable a clearer picture of facility and infrastructure requirements (and their associated land take, if any) to be identified at an earlier stage. In such cases, involvement of

developers early on is a benefit.

### **Viability Analysis**

49. The aim of this strategy is that the costs of planning obligations can be counted early in the development process, and therefore come off the value of the land rather than affecting the viability of development. In some cases however a development might not be able to meet all of the requirements of planning policy and for mitigation of impact and still remain viable. In such cases there will be a need to consider whether there are overall benefits from the scheme.

50. In the event that a developer feels that the total amount of sought contributions would render a particular scheme unviable then the Council may utilise valuation methodologies such as the GLA '3 Dragons'/NTU model and/or utilise external third party viability advice, the cost to be borne by the developer. Such analysis will be on the basis of land values as set by the proper application of planning policy in determining the permissible scope of development, rather than on the price paid. For this reason valuations will typically be done on a residual basis where the price of land is an output of the process, and thereby commercial confidentiality will, where possible, be maintained. Where a scheme delivers significant social benefits, such as schemes with a level of affordable housing of above 50%, special account will be taken of this in assessing the appropriate level of contribution.

51. If the assessment reveals to the satisfaction of the local planning authority that a scheme would be unviable then an assessment will be made as to whether the scheme would still be acceptable in planning terms with a reduced level of contributions. Priorities are as set out earlier in this strategy.

### **Securing Implementation**

52. The Borough has procedures in place to ensure that obligations are complied with and that moneys accrued from contributions are spent. Projects are listed in an annual monitoring report.

### **Repayment Clauses**

53. The standard period is ten years from receipt of moneys for all unspent contributions, unless otherwise stated. As many projects will require gradual pooling from many smaller sites a period of this length is necessary. Every effort will be made to spend contributions received in a timely manner. If for any reason, it seems unlikely the original terms of the agreement will be met, the Council will seek to negotiate equivalent alternative uses with the developer, but will otherwise repay the contribution.

### **Further Information**

54. All initial inquiries regarding potential developments should be with the relevant area development control teams.

## Section 2 Affordable Housing

### Introduction

1. The London Borough of Richmond upon Thames Council has prepared an overall strategy to outline and clarify its current approach, policies and procedures in respect of planning obligations. These would be taken forward through Section 106 agreements, which are typically agreements negotiated between local authorities and developers in the context of granting planning consent. They provide a means to ensure that a proposed development contributes to the creation of sustainable communities.

### Background

2. The Borough has a pressing need for affordable housing. This is set out in more detail in the Borough's Unitary Development Plan First Review (UDPFR) and in Supplementary Planning Guidance (SPG) as well as the Borough's Housing Strategy. These documents should be read alongside this supplementary planning guidance and provide the policy basis for securing affordable housing.

### Unitary Development Plan First Review Policy

3. Affordable Housing will be secured through application of Policies HSG6 and EMP4 of the Borough's Unitary Development Plan First Review. It sets down a threshold for qualifying schemes, which is set out in para 11 below. Policy HSG 6 states "the Council may consider a financial contribution to its Affordable Housing Fund as an alternative to on-site provision on the basis set out in Para 8.35 below."

Para 8.35 "In exceptional cases, where the Council accepts off-site provision of affordable housing, a Section 106 Agreement would be sought whereby a financial contribution to the Council's Affordable Housing Fund would enable equivalent provision to be made elsewhere. The amount involved should take account of the value-for-money approach and other financial constraints under which RSLs operate and would be the subject of negotiation. The amount would be applied to the same ratio of private:affordable housing as would have been provided on-site, e.g. if one:three of all units on site would have been affordable, then the formula should be applied to one third of the on-site total. All contributions made to the ring-fenced Affordable Housing Fund are re-used...either for new affordable housing or for bringing existing private properties back into use as affordable housing in pursuance of housing and planning objectives. As an alternative to financial contributions it may be possible to match a site for off-site provision, where it is in the ownership or control of the same developer involved in the affordable housing site. In such cases, an agreement would need to be drawn up to ensure that the affordable housing was built before, or in conjunction with, the market housing element. Information on the Fund is available from the Council."

4. The Council's Supplementary Planning Guidance on Affordable Housing sets out the methodology of calculating payments:

"16.1 In line with Circ 6/98 and PPG3, the Council's policy has a strong presumption in favour of on-site provision of affordable housing. In exceptional circumstances, the following alternatives may be considered:

- 1) a linked-site proposal, with private sector housing provided on one site and affordable housing on another, provided that:
  - a) both sites are available for development at an appropriate timescale, and
  - b) the ratio of affordable housing: private housing is the same on both sites as it would have been on a single site, given the greater number of units and floorspace involved in two sites, and

- c) there is a legal agreement to ensure that the affordable housing is provided.
- 2) where a private development of sheltered housing is proposed (see Para 7.4 above) affordable housing would not be required in the form of sheltered units. The affordable housing could be provided either
  - a) through development on linked sites, as in 1) above, or
  - b) on the same site as the sheltered housing, but separate from it, or
  - c) through a financial contribution to the Council's Affordable Housing Fund, as in 3) below
- 3) a financial contribution to the Council's Affordable Housing Fund. This Fund, established in 1993, is ring-fenced to the provision of affordable housing in the Borough. It is used on schemes agreed between the Department of Social Services and Housing, the Department of Environmental Protection and Customer Services, and the Department of Environment, Planning and Review, in accordance with Housing Corporation guidance. The level of contribution is calculated according to the method described in section 17 below."

### **Calculation of financial contributions**

5. Where, in exceptional circumstances, a financial contribution is acceptable as an alternative to on-site provision, a standard method is used.

6. The UDP adopted in 1996 set out the formula for calculating financial contributions as 'the market value of the property less 75% TCI'. In most cases where financial contributions have been accepted, 100% TCI has in practice been found appropriate. The formula was not carried forward into the UDP First Review, partly because of on-going discussions about the adoption of a London-wide formula, and partly because it was considered that a formula is better set out in supplementary planning guidance, which is more responsive to changing circumstances than a long-term plan.

7. The formula to be applied now is:

'the value (unencumbered) on the open market of units of the same size and in the same location, less any Social Housing Grant granted to that scheme.'

8. The formula is applied in such a way that a similar ratio of market: affordable units would be achieved as if they were provided on-site. Thus on a scheme of 10 units involving 40% on-site affordable housing there would be 6 private and 4 affordable housing units; but if the affordable housing were provided elsewhere, there would be 10 units on-site and 6.4 affordable units elsewhere. The formula would therefore be applied to 6.4 units.

N.B. In effect this means that on sites of 40% of units of affordable housing, the proportion of affordable units to be provided off- site is equivalent to 56% of the units on- site.

### **Qualifying Schemes**

9. The Local Planning Authority will, where appropriate, seek to secure the provision of additional affordable housing through planning obligations in conjunction with proposals for residential development.

10. In line with national planning policy and as set out above there is a presumption in favour of on-site provision of affordable housing rather than off-site provision-in-lieu. In most cases therefore provision will be in kind rather than through financial contributions for housing elsewhere.

11. Contributions are required by this strategy on sites which are above the site size threshold in Policy HSG 6, or where the provisions of Policy EMP 4 apply (to which no site size threshold applies). The site size threshold is:

- (a) all sites capable of providing 10 or more units; or
- (b) of 0.3 hectares or more, irrespective of the number of units.

12. The ability of a site to provide for development at or above the threshold will be assessed by its ability to be developed satisfactorily in line with the policies of the UDP and other material considerations. The affordable housing as a proportion of overall housing on site should be reflected in the proportion of floorspace in use as affordable housing, as well as the proportion of units.

13. The threshold is expressed in terms of the capability of the site. This is in order to overcome circumvention of thresholds, either by lowering densities to an unacceptable degree, and/or through providing a mix of units contrary to Policy HSG11, or by phasing development, splitting and/or amalgamating sites and/or by submitting subsequent applications on the same or adjoining sites with the effect of thwarting the policy.

### **Contributions for off-site development**

14. The formula for calculating payments for affordable housing requires the following information.

(A) Number of units of equivalent affordable housing proposed of a specific type (typically 56% of the units of that type e.g. two bedrooms)

X

(B) Market value of a unit of that type in that location.

-

(C) Social Housing Grant that would be secured for a unit of that type in that location (=total cost indicator X grant rate)

15. The calculation is made for each house type and the contributions aggregated. The unknowns in this formula will generally be market value, total cost indicator and grant rate.

16. Market Value: this will be calculated for new units on a site-by-site basis.

17. Total Cost Indicator (TCI): this is taken from the annual total cost indicators for affordable housing which are published on the Housing Corporation website. The Total Cost Indicator tables are based on floor areas rather than number of bedrooms. This system is subject to review and may be replaced. Whatever system is used the mechanism for calculating grant rates will be used in element (C) of the formula. The use of the TCI system will be reviewed if it becomes unrepresentative of construction costs in the Borough.

18. Grant Rate: under the current system of Housing Corporation funding each scheme will be assessed on a case by case basis using value for money criteria. There is no fixed grant rate, although grant rates will be capped at no more than 110% of TCI and only then for the most exceptional schemes. The benchmark for grant rates across London is currently around 80% and there is a tendency to push rates down. In addition in LB Richmond upon Thames there is a gap between the number of schemes, which could be funded, and the funding likely to be available. Therefore for planning contributions from sites which are not subject to negotiation the assumption is made of 60% of TCI grant rate, which is likely to reflect typical grant rates in the Borough. The percentage grant rate would need to be subject to regular review, particularly as the onus is increasingly on the developer to demonstrate why public subsidy is justifiable at all.

### **Use of Funds**

19. The contributions secured by planning obligations will be ring-fenced as part of the Borough's Affordable Housing Fund and will only be used on bringing forward additional units of affordable housing. This is a Borough-wide fund, because the Borough is reliant on small windfall sites and it is difficult to anticipate year on year the location of new housing sites. An acceptable use of funds is to augment the normal proportion of affordable housing provided on site.

## **Section 3 Contributions Towards School Places**

### **Introduction**

1. The London Borough of Richmond upon Thames Council has prepared an overall strategy to outline and clarify its current approach, policies and procedures in respect of planning obligations. These would be taken forward through Section 106 agreements, which are typically agreements negotiated between local authorities and developers in the context of granting planning consent. They provide a means to ensure that a proposed development contributes to the creation of sustainable communities.

### **Background**

2. New housing development is likely to increase the number of children in the Borough and has the potential to place a greater demand for pupil places in local schools. Schools in the Borough are already under great pressure in terms of pupil capacity, and the Council has limited resources with which to undertake capital schemes for expansion. In addition, the Council in its community plan is committed to ensure there are sufficient high quality school places in the Borough for Borough residents, including places for pupils with special educational needs. Government policy aims to ensure that infant class sizes are limited to 30 pupils and provide nursery places for three and four year olds.

3. In the Audit Management Handbook on the supply and allocation of school places, entitled 'Trading Places', sections 5.24 - 5.27 confirm the legitimacy of seeking a contribution towards the costs of school infrastructure where an increase in demand for school places resulting from housing development.

4. UDP First Review Policy CCE8 states that "The Council will ensure that the provision of schools, pre-schools and other education facilities is sufficient in quantity and quality to meet the needs of residents..." and in Para 10.57 "New residential developments may give rise to a need for school places which cannot be met locally. In such circumstances the Council will normally require developers to contribute financially to the provision of the necessary educational facilities."

5. This is also supported in Policy HSG18 "...All schemes will be subject to negotiation as to the appropriate level of contribution towards necessary education provision, provided a need arises directly from the development concerned which cannot be met by existing or planned provision. Contributions sought will be fairly and reasonably related in scale and kind to the proposed development."

### **Schools Organisation**

6. Schooling is compulsory from the age of 5 up to 16 years, and the Council as the Local Education Authority (LEA) has a duty to provide primary and secondary school places for such children.

7. The School Standards & Framework Act 1998 requires each local education authority (LEA) to publish a School Organisation Plan for its area of consultation. This plan covers a five-year period and is reviewed and updated annually on a rolling programme. The detailed methodology for calculating the capacity of schools is set out within this School Organisation Plan, rather than this supplementary planning guidance. In considering the number of places that should be available within the Borough over the next five years, the LEA has taken into account the likely demand for places at all types of maintained school. The LEA will continue to monitor and respond to demand for places in primary schools following the opening in September 2002 of new reception places. The LEA is also undertaking a review of secondary school places in order to meet its commitment to high quality, local provision for pupils.

8. The Borough's School Organisation Plan 2002-2007 adopts the following methods for projecting school places.

9. For primary schools: In-borough pupil intakes are projected by deriving reception pupil numbers from

ward level birth data provided by the Office for National Statistics and the Greater London Authority's projection of live births, rolled forward with take-up and wastage factors applied for year group cohorts. Forecasts have been adjusted to build in the estimated impact of new provision in areas where take-up may have been previously suppressed due to a shortage of permanent places.

10. For secondary schools: Primary school leavers are forecast using the methodology described above. Primary school leavers are then used to estimate demand for secondary school intakes using a replacement ratio. The projection of secondary school pupil demand is based on a forecast of the demand from in-borough resident pupils. An estimate of take-up by in-borough primary school leavers is calculated using data based on the numbers of pupils moving through primary schools. The projected take-up of out-borough pupils is calculated using a rolling average of recent take-up.

11. In the secondary sector, the Borough is planning to fund investment in school infrastructure. This should address acute accommodation deficiencies in a number of secondary schools, in addition to providing extra places. A steady increase in overall pupil numbers in future years will produce a consistent shortage in the region of 120 places per year group. It is worth noting that a number of secondary schools recruit in excess of their assessed capacity, which disguises the level of the shortage.

12. In terms of the geographical distribution of shortages the Borough has been divided into 10 areas for school rolls planning purposes. These areas are currently being reviewed and this work will be completed by the end of July 2005. The area boundaries will be treated with a degree of flexibility in assessing the need for school places. The Borough is considering expansion of places in the secondary sector to meet demand, including the proposal by the Diocese of Westminster for a new Roman Catholic Secondary School.

13. A further 1120 primary school places have been added to capacity through a Private Finance Initiative (PFI) signed in June 2002. The project includes two new community primary schools (one in Kew and one in Richmond), the expansion of two existing voluntary aided (VA) schools in Twickenham, and the expansion of a community infant and community junior school that currently share the same site in West Twickenham.

### **Calculation of School Capacity**

14. The physical capacity of schools is determined through a Net Capacity Assessment, which is the new DfES measure of the capacity available at each school (see DFES Assessing the Capacity of Schools August 2002). However, the statutory requirement for class sizes of 30 places or less for an infant school takes precedence over NCA.

15. The Borough's School Planning Areas will be used to assess the projected deficit of primary places occasioned by new development. The projected deficit in places in secondary schools will be assessed using overall capacity, whilst taking into account local variations where appropriate

### **Qualifying Schemes**

16. The Local Planning Authority will, where appropriate, seek to secure the provision of additional school places through planning obligations in conjunction with proposals for residential development. Such educational provision will be sought where a projected deficit in school capacity is directly related to the proposed development.

17. Where a proposed development will create an increased demand for school places the Council will negotiate with developers to secure contributions via a planning contribution. However, it is recognised that certain types of housing such as specialist housing for the elderly will not directly generate children, and therefore contributions towards educational facilities will not be sought by the Council in respect of such

developments.

18. The payments will apply where a development is within a planning area or areas with no capacity, or where a development within the area / areas would generate sufficient children to use up all spare capacity in that school. Account will also be taken of the need for school places in the adjoining planning areas where the development is likely to increase the pressure for places within that area/s.

19. The LEA, acting under advice from the DfES and OFSTED plans for a permanent 4-8% surplus of places to allow for parental flexibility. An area is deemed to be at capacity once there is 4% or less spare places in schools. This factor may be applied when, for example, reception class places, or other year groups are 'at capacity' whilst some other year groups have capacity. Individual consideration will be given to assess whether an area can actually accommodate the likely pupil yield even when there are places potentially available in some year groups

20. Where shortages of places exist in the primary or secondary sector the Council will apply the relevant parts of the formula (see below).

21. All residential development, including conversions, has the potential to create demand for school places. However, the Local Planning Authority will require a contribution where;

there is a net gain of 3 or more residential units, excluding specialist housing for older people.

22. The specific circumstances of each development will be taken into account in negotiations.

### The Formula

23. The following formula will be used to calculate payments due:

(A) number of school age/nursery children per house type (child yield)

X number of units of each house type x proportion of children likely to attend schools in the Borough (pupil take-up)

= Number of children generated.

(B) number of children generated for each school category (i.e. Primary)

X cost of new school place for that school category

= Cost of providing extra school places.

### Explanation of Each Element of the Formula

24. Child Yield is the average number of children likely to be generated by new housing. From London Research Centre data, the Borough is able to estimate the number of children likely to occupy housing of different sizes. These are set out below:

Number of children per house type

Bedrooms	1	2	3	4+
General Market Housing	0.10	0.49	1.13	1.91
Social Housing	0.08	1.61	1.99	3.29

25. The table is based on London Research Centre 'Child Yield' estimates; based on the typical proportion of children attending each school type.

26. The age range used in relation to child yield in the formula will depend on current shortages of school places in the Borough as the Council will only request contributions from developers when need exists, or is projected to occur within 5 years, in local schools. For example, if need has been identified in local secondary schools only, then the Council will request contributions based on the number of secondary age children per house type.

27. Pupil Yield is how children are distributed amongst the different categories of school, nursery, primary and secondary. The child yield figures relate to children from 0 up to 16 years of age. However, a set of standard distributions produced by the London Research Centre can be used to calculate child yield figures for different age ranges.

28. The resulting age breakdown is as follows.

Nursery	13%
Primary	52%
Secondary	18%

29. Pupil take-up is the proportion of children likely to be educated in maintained schools in the Borough.

30. It is recognised that not all children of school age generated by a development will attend a maintained school in the Borough but may seek alternative education in private schools or in other places. The child yield figures relating to the number of school age children generated by a new development will therefore be multiplied by a take-up factor to take account of this.

31. For social housing 100% of the pupil yield is assumed to require places in local authority schools. However it is recognised that a proportion of these children will already be educated within local schools; where a developer is able to provide evidence that this is the case a proportionately reduced contribution will be negotiated.

32. For private housing, a census derived level of 57% of the secondary and post-16 pupil yield is applied to these sectors and a variable area dependent level in the primary and nursery sectors. The variable area dependent level is reviewed annually and following a review in 2004 is as follows:

Pupil take-up level from birth for 2004/2005:

Hampton	65%
Teddington	70%
West and South Twickenham	100%
Heathfield and Whitton	90%
Central and East Twickenham	42%
Richmond	70%
Kew	85%
East Sheen	57%
Barnes	41%
Ham	67%

33. Capital Costs. The final element in the Council's formula for planning contributions involves calculating

the average cost of providing a school place. The average cost of providing a secondary, primary and nursery place has been calculated using DfES indicators. Construction costs are based on the DfES multiplier: - a set of multipliers published annually by the Department for Education and Skills to enable Local Education Authorities to develop additional school places using credit approvals. On a case-by-case basis therefore costs can be higher. They include the DfES estimate of the increased construction costs of 15% in Richmond upon Thames. The costs for 2005-6 are: -

Primary/Nursery: £10,201 per pupil place

Secondary: £16,018 per pupil place

34. For negotiated schemes construction costs for the provision of a new school, or the significant extension of an existing school, will be based on estimated actual local costs.

35. The figures used in the formula do not represent the full cost of providing a child with a school place. They are based on the costs of construction, and include building costs, architectural fees, basic furnishing costs, feasibility studies, and a nominal figure for the cost of land in relation to the creation of a new school. They do not include the cost of providing teaching staff or any other non-capital school equipment that are not connected with the initial construction and fitting out of the building.

### **Land**

36. Land, if required for a new school or an extension to an existing one, should be provided free of charge by the developer to the Council. The size of the site area required should be agreed with the Local Education Authority, as should the location, shape and orientation of the land, before a plan is produced for the proposed development. This information will be incorporated within a planning obligation.

37. Where the scale of a development is sufficient in itself to justify a new school, then the developer will be expected to provide the site free of charge and pay the full construction costs including all design fees and charges.

38. The use of DfES cost multipliers per pupil place to calculate a developer contribution is not suitable for the development of new schools. The DfES currently funds each place at a level intended to cover the average cost of providing such places; that is, based on the average of new build costs and extension costs, which are lower. It does not, therefore, support the full cost of building whole new schools.

39. If the pupil yield from a development can be accommodated by extending an existing school, or by replacing existing temporary accommodation with permanent accommodation, then the developer will be expected to acquire and provide any land required free of charge. Contingency measures may be appropriate if this subsequently proves impractical.

### **Use of Funds**

40. The contributions secured by planning obligations would be required to part fund the one-off capital costs of provision of new permanent and temporary classroom space in order to meet rising school rolls. Funds will not be used to revenue fund the running of teaching and other costs in schools which is reflected in the government's funding formula for schools. Nor are funds required to make up any existing deficiency, rather the deficiency that will solely arise from the planned new housing.

41. Central Government issues Supplementary Credit Approvals to local authorities (to borrow funds) in order to meet rising school rolls. However these approvals are contingent on local authorities using their best endeavours to secure planning obligations as enabling funding.

42. All payments will be maintained within a fund for expanding places in schools which have, or would have, as a result of the development, no or limited spare capacity.

43. The level or kind of contribution will be considered in the light of local factors. For example, there may be cases where it is not feasible or appropriate for new permanent build to be provided and for other contributions to be sought, e.g. to improve obsolete buildings to replace mobile classrooms at existing schools with extended permanent accommodation.

## **Section 4 Community Safety**

### **Introduction**

1. The London Borough of Richmond upon Thames Council has prepared an overall strategy to outline and clarify its current approach, policies and procedures in respect of planning obligations. These would be taken forward through Section 106 agreements, which are typically agreements negotiated between local authorities and developers in the context of granting planning consent. They provide a means to ensure that a proposed development contributes to the creation of sustainable communities.

### **Background**

2. The Richmond upon Thames Community Safety Partnership has prepared a Community Safety Strategy for the Borough. Its aim is to reduce crime, disorder and substance abuse and to make Richmond upon Thames the safest Borough in London. It is informed by a Crime Audit, which is carried out every three years.

3. The Community Safety Strategy for 2002-2005 identifies the following priorities:

- to make Richmond upon Thames the safest Borough in London by raising the performance of the Community Safety Partnership in preventing and reducing crime and disorder;
- to tackle and protect our communities from anti-social behaviour.
- to improve our support and services to victims of crime.
- to prevent and reduce youth offending.

### **National and Regional Policy**

4. Section 17 of the Crime and Disorder Act 1998 imposes a duty on local authorities to have regard to the likely effect of their decisions and actions on, and the need to do all they reasonably can, to prevent crime and disorder in their areas.

5. Circular 5/94 "Planning Out Crime" states that crime prevention can be a material consideration when planning applications are considered. It underlines the importance of design in removing the opportunity for crime and disorder. It suggests that creating environments that are lively and well used deters criminal activity. Overall, it is proposed that policy should address the deterrent effects of a number of factors, including good design, layout, and lighting, as well as more embracing notions of avoiding single-use developments with low levels of public activity. Where large numbers of people congregate, easy access to transport routes to aid dispersal of crowds is also a consideration.

6. Policy 4B.1 of the London Plan requires developments to be safe for occupants and passers by.

### **Qualifying Schemes**

7. Qualifying schemes will be as follows:

- a) All A4 (pubs and bars) schemes open after 8.0 p.m. and above 100 sqm gross floor area,
- b) A5 (takeaway) schemes open after 8.00pm above 100sqm gross floor area, and
- c) all nightclubs

## **Calculating Payments**

8. Contributions will be negotiated on the basis of the location of the proposal, the factors that are known to increase the risk of crime and disorder in the surrounding area, including current levels of use, size and opening hours of premises, as well as the sensitivity of the area. Contributions will also be linked to the costed programmes of the Community Safety Partnership for that area.

The payments apply to both new developments and to changes of use, to extensions, applications for use of forecourts and for extensions to opening hours.

## **Use of Funds**

9. Funding will be ring-fenced into a fund for expenditure on capital and diversionary/intervention and educational projects prioritised in the Borough's annual community safety strategy, including the CCTV control room.

10. Examples of local community safety needs include:

- provision of improved lighting in the vicinity of the proposal:
- CCTV, whether supplementing existing systems or new schemes, including as appropriate commuted sums for management and maintenance
- environmental improvements that contribute towards safer town centres and other areas affected by a development e.g. landscaping works to improve visibility and remove areas of concealment, works on adjacent waterways and towpaths
- safety improvements to existing or proposed public transport interchanges, facilities and car parks
- enhanced night bus networks or specially created services to provide alternative safe forms of travel to and from major new facilities and leisure uses

## Section 5 Health

### Introduction

1. The London Borough of Richmond upon Thames Council has prepared an overall strategy to outline and clarify its current approach, policies and procedures in respect of planning obligations. These would be taken forward through Section 106 agreements, which are typically agreements negotiated between local authorities and developers in the context of granting planning consent. They provide a means to ensure that a proposed development contributes to the creation of sustainable communities.

### Background

2. Along with all other London boroughs, Richmond upon Thames' services are experiencing pressure from an expansion of population caused in large part by house building. This section of the planning obligations strategy is designed to ensure the planned and co-ordinated provision of services.

### National Policy Context

3. Circular 1/97 notes that planning obligations "can provide a means of reconciling the aims and interests of developers with the need to safeguard the local environment or to meet the costs imposed as a result of development - e.g. the full cost of essential community facilities required as a direct result of a proposed new development. So, for example, where a development will create a need for extra facilities -... - it may be reasonable for developers to meet or contribute towards the cost of providing such facilities." (Para B7).

### London Plan Context

4. Paragraph 3.85 of the London Plan highlights the disparities in list sizes and access to GPs across London. It states that planning can address such disparities by "ensuring the provision of primary care facilities as part of new residential and commercial developments (including through Section 106 agreements)..."

### Qualifying Schemes

5. Will be those above the site size threshold, which is:  
all sites capable of providing 5 or more residential (C3) units

### Calculating Payments

6. The formula is based on the size of the development. The Formula is:

(A) For Primary Health Care - £147 per dwelling unit

X

(B) Occupancy Factor

7. The Occupancy factor is as follows:

Size of Unit	Occupancy Factor
1 bedroom	1.39
2 bedroom	1.66
3 bedroom	2.14
4+ bedroom	2.93

8. The Borough is not in receipt of Government Sustainable Communities Plan funding for population increases generated by development. If this situation changes then contribution levels will be reduced pro-rata.

9. Richmond and Twickenham Primary Care Trust (PCT) is the organisation responsible for the health of the local community. It is allocated £176.3 million per year. Its role and responsibility is to work within this budget and purchase services effectively. However, services are under increasing demand, including local hospitals, community and general practice services, and funding the cost of medicine. 99.95% of the budget is tied up in existing services, leaving only 0.05% for block capital. The PCT contracts with practices for the provision of general medical services. GPs operate in single practices or in group partnerships, operating from the same premises. Recent changes have increased flexibility for the PCT to directly employ professionals e.g. salaried doctors.

10. Contributions are required across the Borough. Within major new developments, on-site facilities for primary care, such as doctors' surgeries, will be required. On smaller residential development sites, and where the new development places demands on community facilities, the need for full provision will be replaced by the requirement for contributions, although in areas where the need for new facilities is acute, where major sites are lacking, and shortages would be exacerbated by development, then on-site provision may also be required on medium sized sites. The Council will consult the appropriate organisations with regard to the need for provision as a direct consequence of development.

11. The capital-cost estimate is based on NHS Annual Schedule of fees and allowances. From the April 2004 guidance it is possible to estimate the average construction cost of a typical three handed GP practice, divided by three to obtain a cost base for a single GP. The cost estimates are based on the national average rolls of 1,833. Therefore a new three-GP practice would serve an additional 5,499 population.

12. Each additional GP would require 150 sq. m. overall on this basis, with the cost of that floorspace equating to £1,800 per sqm. One additional GP will require £270,000 for additional floorspace, a three handed practice would require £810,000. The cost of additional floorspace for a GP for a new patient is  $\text{£}270,000/1,833=\text{£}147$  per person.

## **Section 6 The Public Realm, Open Space, and the Thames**

### **Introduction**

1. The London Borough of Richmond upon Thames Council has prepared an overall strategy to outline and clarify its current approach, policies and procedures in respect of planning obligations. These would be taken forward through Section 106 agreements, which are typically agreements negotiated between local authorities and developers in the context of granting planning consent. They provide a means to ensure that a proposed development contributes to the creation of sustainable communities.

### **Background**

2. Nearly two thirds of the Borough is open space, and most of this is accessible to the public. This includes world-renowned areas such as the Royal Parks of Richmond and Bushy and Kew Gardens as well as extensive areas owned and managed by the Council's Parks and Open Spaces Section.

3. The River Thames runs for 28km in the Borough, with 34km of river bank nearly all of which is accessible to the public. Much of the Borough's open space is of wildlife importance. Richmond Park is a Site of Special Scientific Importance.

4. The public realm comprises all parts of the environment that define the public spaces between buildings. It comprises the public highway and street scene, as well as public spaces. The visual quality of this area is often enhanced by 'semi public' areas such as front garden walls and trees. Attention to and design of this area is as important, if not more important, than the design of buildings themselves.

5. The street is one public service that almost everyone uses yet it is not often given the attention it deserves. If this public realm is difficult to use, is not walkable, and is not inviting, then people will use their cars more than they would wish and public life and activity becomes impoverished.

### **National And London Policy Context**

6. Following the Urban White Paper an Urban Parks Task Force was established to develop proposals to improve urban parks, play areas and green spaces. The Task Force's report, "Green Spaces, Better Places," emphasises the diverse value of urban open spaces. The Task Force recommends that green space planning should be put at the heart of urban regeneration but identified significant obstacles to realising this potential.

7. Circular 1/97 notes that "...the provision of community facilities e.g. reasonable amounts of small areas of open space, social, educational, recreational or sporting facilities, may be acceptable, provided that such facilities are directly related to the development proposal, the need for them arises from its implementation, and they are related in scale and kind".

8. PPG 17: 'Sport, Open Space and Recreation' states "local plan policies should give a clear indication of the types of development for which agreements relating to sports and recreational facilities may be appropriate and that planning agreements might cover:

- the provision of on-site and off-site recreational facilities related to the development;
- in the case of small developments, a contribution to nearby sport and recreation or open space provision;
- alternative provision when recreational land or open space is lost."

9. The London Plan 2004 contains a number of policies to protect, promote and create accessible open spaces.

10. “Places, Cleaner, Safer, Greener”, published by the Office of the Deputy Prime Minister in October 2002, deals with the whole of the “public realm” and recommends a holistic approach and an end to “creeping deterioration”. The authors reiterate the importance of quality open spaces for disadvantaged neighbourhoods and to the need to respond to changing patterns of demography and development. The document represents the Government’s formal response to the Urban Parks Task Force containing a commitment to develop a clearer national framework for urban parks and green spaces and to establish a new unit within the Commission for Architecture and the Built Environment (CABE) for urban space.

11. PPS1 General Policy and Principles states that “High quality and inclusive design should create well-mixed and integrated developments which...have well-planned public spaces that bring people together and provide opportunities for physical activity and recreation. It means ensuring a place will function well and add to the overall character and quality of the area”. (para 35).

12. The London Plan contains a specific policy 4b.4 on enhancing the quality of the public realm. It states, “planning applications will be assessed in terms of their contribution to the enhancement of the public realm.”

13. The Borough endorses ‘Streets for All’ which is a London-wide design guide produced by English Heritage for improvements to the Public Realm in conservation areas.

### **Local Policy Context**

14. A key aim of the Borough’s Community Plan 2003-2006 is to improve the appearance of open spaces, with priority on improving playgrounds.

15. The Unitary Development Plan First Review designates and protects a range of open spaces in the Borough. It protects land designated as public open space and seeks to increase the enjoyment of public open space through site management and enhancement measures. It also protects public and private sports grounds and protects sites of nature conservation importance. It seeks to maintain and improve access to the River Thames and its foreshore.

16. The Borough has produced a draft Open Spaces Strategy, in partnership with a range of groups including the National Trust and the Royal Parks Agency.

17. The amount of open space is generous, and the quality generally high, but unevenly distributed with some areas having limited access to open space. However the infrastructure is beginning to deteriorate and will require substantial investment if that quality is to be maintained and health and safety is not to be compromised. Use of planning obligations to increase investment is one of the draft Open Spaces Strategy recommendations. A vision for Richmond upon Thames’ open spaces is “To provide access to an exciting range of open space experiences for all.”

18. The Borough’s Unitary Development Plan First Review contains policy BLT14 on the design of spaces between buildings.

19. In 1999 the Borough adopted a Tree Strategy, which contains policies and priorities for tree planting in the Borough.

20. In 2002 the Borough produced a Walking Strategy, which lists a number of measures to improve walking in the Borough.

21. The Borough has published a Street Design Guide, which contains design advice for works to the streetscene.

22. Many of the Borough’s Conservation Area studies contain specific recommendations for public realm improvements.

## **Qualifying Schemes**

23. The Council will, where appropriate, seek to secure obligations relating to the matters covered in this supplementary planning guidance.

24. Qualifying Schemes will be those above the threshold, which is:

all sites capable of providing 5 or more residential (C3) units

25. Whether or not a development is required to contribute towards one or more of the specific headings, e.g. children's play, the riverside, is dependent upon its location.

### Open Space

- General Open Space Improvements - All schemes above the threshold.
- Open Space Deficiency - All schemes above the threshold in local open space deficiency areas

### Playing pitch/Sports Development/Indoor Sports

- All residential schemes above the threshold.

### Children's Play

- Towards making up deficiency in local area - all residential schemes other than housing for the elderly outside 400m of a children's play area intended to meet Local Equipped Area for Play (LEAP) standards
- Improvements of children's play facilities - all residential schemes other than housing for the elderly within 400m of a children's play area intended to meet Local Equipped Area for Play (LEAP) standards.

26. Residential schemes that are less likely to contribute towards demands for open space, e.g. some forms of special needs housing, will be exempt from contributions.

27. Where a development includes significant on-site provision, which in many cases will be preferred, contributions will not be sought.

## **Calculating Payments**

28. The Formula is:

(A)

For Open Space and the Public Realm -

Towards general improvements - £20 per dwelling

Towards deficiency (if in an area of deficiency) - £100 per dwelling

For Playing Pitch provision, sports development and improvements to indoor sports. £560 per dwelling -

And

For children's play facilities -

Towards making up deficiency or for improvements (see para 34 below) - £100 per dwelling

X

(B) Occupancy Factor

29. The occupancy factor is as follows:

Size of Unit	Occupancy Factor
1 bedroom	1.39
2 bedroom	1.66
3 bedroom	2.14
4+ bedroom	2.93

### Open Space

30. With the rise in the Borough's population anticipated in the London Plan, the Borough's existing open spaces will come under increased use. Assuming the average dwelling occupancy of 2.3 persons this equates (rounded) to an additional 7,090 persons over 10 years (based on projecting forward the UDP First Review housing trajectory of 303 dwellings per year in the Borough). With this increase in population there will be an increase in usage of parks and public open spaces. On the basis of information from the London parks and open spaces benchmarking club, the average annual cost per person of grounds maintenance is £7.50, equivalent to an increased cost of £53,195 over 10 years at 2004 prices. Divided by the number of dwellings proposed in the UDP in the Borough over this ten-year horizon, this requires a contribution of £20.00 per dwelling.

31. The calculation of contributions for sports development includes an element based on increased demand for playing pitches and a contribution towards improved indoor sports facilities. Development to National Playing Field Association Standards will generate a need for 12 sq. m. of playing pitches per person. With capital costs and revenue contributions for 10 years based on 5% of capital costs this equates to around £320 per dwelling.

32. Although the Borough has generous provision of playing pitches, many of these serve a London-wide function, for example in rugby, and there is a relative lack of provision for public pitches.

### Playing pitch/Sports Development/Indoor Sports

33. The calculation of contributions for sports development includes an element based on a contribution towards improved indoor sports facilities. Using the Sport England model on the basis of additional population generated by housing over the next ten years gives a requirement for an additional £3million for additional indoor sports facilities, or £560 per dwelling.

### Children's Play

34. The calculation for contributions towards children's play is based on two factors. Firstly the cost of increasing the scope of children's play provision in line with increases in population, secondly the costs of bringing up existing children's play areas up to required standards. On the same basis as the calculation of informal play space, the cost per person of new provision is around £100 per person.

### Transfer and Maintenance of Open Space

35. The Council may be prepared to adopt and maintain properly laid out open space, subject to payment of a commuted sum to cover costs in accordance with Circular 1/97. Transfer of open space will normally take place once it has been laid out, fully equipped and maintained for a minimum period of 12 months to the satisfaction of the Council and the payment will be payable on the transfer of the land. The figure will be calculated using the current contract prices for maintaining open space of comparable characteristics and features over at least a 10 year period (to ensure that the open space can become established) and will be index linked from the date the agreement is signed. Commuted payments will not be used for general purposes to cover existing maintenance or running costs of unimproved facilities. If as a result of development new playground equipment or other equipment is provided, a similar commuted maintenance payment based on current costings will be sought. This is to cover the typical costs of repair and replacement of items that would not otherwise have been required were it not for the direct impact of a scheme on local facilities and the increased burden on local authority budgets. If developers do not intend to seek adoption, the Council will still need to be satisfied through the submission of a management plan that adequate alternative arrangements are put in place for long term management and maintenance by, for example, the establishment of a sufficiently resourced management company or trust.

### Use of Funds

36. Funding will be assigned to separate funds for each of the purposes specified above, via the Council's ring-fenced Parks, Public Realm and Open Spaces fund. It is anticipated that voluntary groups, such as the British Trust for Conservation Volunteers, would be able to bid for funds where appropriate.

37. The following open spaces are identified in the draft Open Spaces Strategy as priorities for improvements.

Area	Open Space Name	Category
Hampton/Hampton Hill	Hatherop Park	Recreation Ground
Barnes	Castelnau Recreation Ground	Park
Barnes	Barn Elms	Sports Ground
Whitton/Heathfield	Murray Park	Sports Ground
Twickenham	York House	Park
Ham and Petersham	Beaufort Court Play Area	Open Space
Barnes	Vine Road Recreation Ground	Recreation Ground
Richmond	Terrace Gardens	Park
Whitton/Heathfield	Heathfield Recreation Ground	Recreation Ground
Hampton/Hampton Hill	Buckingham Park	Park

38. Priorities for local tree planting are listed on an area by area basis in the Borough Tree Strategy and shown on the UDP First Review proposals map. Measures to comply with the Disabilities Discrimination Act are also a priority.

39. As well as the public realm projects listed previously, another priority will be to carry out improvements at heavily used key gateways into the Borough, such as the recent Kew Plaza project, as well as proposed areas for environmental improvement on the UDP First Review proposals map.

40. In conjunction with local groups, the Council is keen to carry out area street audits, which look at the whole street environment and propose measures for improvement. A pilot project has been undertaken in Twickenham town centre.

41 Most of the Borough's conservation areas have conservation area statements, which set out the priorities in that particular area. The Arcadia Project provides for a package of improvements to the Riverside supported by the Heritage Lottery Fund subject to the achievement of appropriate matched funding.

42. Public art will be funded as part of this package. On larger schemes art should be commissioned at an early stage of the process as an integral part of the architectural or landscape design.

## **Section 7 Transport**

### **Introduction**

1. The London Borough of Richmond upon Thames Council has prepared an overall strategy to outline and clarify its current approach, policies and procedures in respect of planning obligations. These would be taken forward through Section 106 agreements, which are typically agreements negotiated between local authorities and developers in the context of granting planning consent. They provide a means to ensure that a proposed development contributes to the creation of sustainable communities.

### **Background**

2. The Borough is linked to the underground network via the District Line link to Richmond. There are good rail links into Central London but weaker orbital rail links. Public transport in many parts of the Borough is reliant on the bus and many residents regard car use as essential.

### **National and Regional Policy Context**

3. Government guidance in PPG 13 paras 84-85 states: "Planning obligations may be used to achieve improvements to public transport, walking and cycling, where such measures would be likely to influence travel patterns to the site involved, either on their own or as part of a package of measures... Planning obligations where appropriate in relation to transport should be based around securing improved accessibility to sites by all modes, with the emphasis on achieving the greatest degree of access by public transport, walking and cycling. While the individual circumstances of each site and the nature of the proposal will affect the details of planning obligations in relation to transport, developers will be expected to contribute more to improving access by public transport, walking and cycling for development in locations away from town centres and major transport interchanges, than for development on more central sites. Where development can only take place with improvements to public transport services, a contribution from the developer (payable to the local authority) would be appropriate."

4. PPG13 also provides guidance on traffic assessments and Travel Plans.

5. The London Plan 2004 outlines the GLA's policies in respect of transportation. Policies in section 3C reiterate the need for integrated development and transport and seeking improvements to public transport and capacity. It also includes policies supporting the needs of pedestrians and cyclists. Policy 5.3 identifies public transport improvements as a priority area for planning obligations.

### **Local Transport Policy**

6. Policy TRN2 of the UDP First Review states that new development or changes of use will only be permitted where it can be demonstrated that the transport infrastructure can accommodate it, or be adapted to do so, without creating congestion and hazards on the road network. The policy seeks, in appropriate cases, planning obligations appropriate to the site and commensurate to the scale of development, in accordance with the Council's transportation policies. Mitigating measures, such as contributions to public transport, cycling/walking facilities, junction improvements, and the provision of a company travel plan, will be required where appropriate.

7. The Local Transport Strategy for the Borough is based on a balanced approach, providing freedom of choice for residents. We understand that private transport has very obvious benefits to the individual, in terms of personal safety and security, mobility and liberty and is often essential to groups such as disabled drivers, older people, parents with children and those with jobs that require them to transport heavy or bulky equipment. Therefore, whilst seeking to provide the widest range of viable alternatives, we recognise that

car use is often of the greatest benefit to the individual. Indeed in an outer London borough it is recognised that use of the private car will prevail for the foreseeable future.

8. The Strategy has the following objectives:

- Clear Road Ahead

‘To aim to achieve the safe, unobstructed flow of traffic on the highway network’

- Safety First

‘To improve the safety of all users of the transport network through engineering measures, enforcement and education’

- Civic Pride

‘To protect local residents and businesses from the adverse effects of commuter parking to minimise the harmful environmental effects of road traffic pollution, congestion and noise on the quality of life of the local residents’

- Free Transport Choice

‘To facilitate the free choice of residents in their transportation decisions by providing a range of viable alternatives’  
and

‘To provide an integrated and accessible transport system to ensure the safe, secure and efficient movement of people and goods on the Borough’s road network giving due regard to the local environment’

- Planning for the Future

‘To ensure that land use and transport policies are co-ordinated to minimise the number and length of trips’

9. The Council will require that new development is made accessible by cycle or public transport. Higher density housing developments will be acceptable where they are in character and where they are located in existing town centres or areas which are highly accessible by public transport or where transport can be suitably enhanced. (See UDP First Review Policies TRN1 and HSG11).

10. Residential developments with limited parking may be acceptable in areas of good public transport accessibility, provided a controlled parking zone is in place.

11. All new developments (or changes of use) will only be permitted where it is shown that the transport infrastructure can accommodate trips generated by or attracted to it, or can be adapted to do so without creating congestion and hazards on the road network.

12. Developers will be expected to pay for mitigating measures such as contributions to public transport, cycling/walking facilities, and junction improvements.

### **Transport Assessments**

13. For larger and negotiated schemes the Transport Assessment will be used as the basis for determining the appropriate measures to be secured through a planning obligation. Further guidance on the

preparation of these is attached as Appendix 1.

14. Where the impact of the development is likely to be significant in air quality terms, an air quality assessment will also be undertaken.

### **Travel Plans**

15. Alongside these assessments, Travel Plans will also be required for significant new non-residential developments and events, showing how transport use can be optimised and managed. These will be secured by planning obligations where appropriate. Developers will also be required to pay, via a planning obligation, for carrying forward travel plans and making them effective. Particular consideration will be required for major tourist attractions and rugby and other events attracting large influxes of people. Further guidance on the preparation of these is attached as Appendix 2.

### **Parking**

16. Throughout the Borough, traffic and parking problems are such that the Council will carefully consider the appropriate number of car parking spaces with any development. New developments should provide sufficient parking and whilst the UDP First Review sets maximum parking standards, consideration will only be given to provision of fewer spaces in local areas where there would not be unacceptable overspill of on-street parking in the vicinity or other adverse impacts.

17. Good levels of public transport availability means that such an approach can be taken without detriment or harm to the vitality of town and local centres. Parking provision below maximum standards may be acceptable for residential developments in locations within controlled parking zones but elsewhere, sufficient parking space should be provided to cater for parking needs.

### **Qualifying Schemes**

18. Planning contributions will apply to sites above the following thresholds:

(a) All sites capable of providing 5 or more residential (C3) units

and

(b) all commercial\* schemes with a gross floor area of 100sqm Gross Floor Area (GFA) or more

(\* i.e. B1, and A1, A2, A3, A4, or A5 uses)

### **Calculating Payments**

19. The formula is based on the likely level of trip generation from a development and the costs associated with expanding transport capacity to cope with growth from development.

20. The Formula is:

(A) £1432 per additional C3 dwelling or £500 per additional 100 sqm gross floor area for commercial uses

X

(B) Trip Generation Factor

X

(C) Public Transport Accessibility Factor

21. The Trip Generation Factor is as follows and is based on comparative levels of trips generated for different land uses based on standard trip generation databases:

Land Use	Trip Generation Factor
Residential (per Unit)	
Flats	
1 bedroom	1
2 bedroom	2
3 bedroom	2.5
4+ bedroom	3
Houses	
1 bedroom	2
2 bedroom	4
3 bedroom	5
4+ bedroom	6
Commercial Uses (per 100 sqm.)	
B1 (Business)	2
A1 (Shops)	17
A2 (Financial and Professional Services)	4
A3, A4, A5	7

22. The Public Transport Accessibility Factor is based on the map of public transport accessibility levels for London (see map appended).

PTAL	Public Transport Accessibility Factor
0	4
1a	3
1b	2.5
2	2
3	1
4	0.8
5	0.6
6	0.4

23. The scale of contributions is based on the capital costs of transport investment necessary to pay for the expansions in transport capacity required to cope, to an acceptable level of service, with predicted levels of population growth. The Mayor of London's Transport Plan (2002) is used as the basis of these calculations, which predicts a shortfall between necessary expenditure and government committed expenditure. This shortfall is projected forward from 2010 to 2016 to conform to the planning horizon of the London Plan, which contains housing policies designed to accommodate this rise in population.

24. The projected shortfall was around £2.09 billion London-wide. The 2004 spending review gave TfL £789 Million in additional expenditure. Taking off £950 million a year from expenditure by boroughs from surpluses in the borough's Parking Revenue Accounts the shortfall is £801 million. Dividing by the 299,000 additional homes planned in the London Plan 2004 between 2004 and 2016 produces a necessary expenditure of £2,679 /dwelling, which is then divided by the average dwelling occupancy to produce the final figure. When sub-regional development frameworks is prepared for South London then any more detailed estimates of growth and cost of necessary infrastructure will be used. These strategic figures only relate to highways and public transport expenditure, and therefore may underestimate the costs of additional expenditure on walking and cycling infrastructure.

### **Negotiated Obligations for Schemes subject to Transport Assessments**

25. Where the transport assessment of the impact of the development indicates that the increase in traffic from the development is likely to result in:

- increased delays to public transport; and/or
- deterioration in the ease of use or safety of the highway network for pedestrians, cyclists or public transport users; and/or
- reduction in safety for car and other vehicle users; and/or
- increase in congestion; and/or
- a potential for an increase in the amount of traffic using unsuitable roads (e.g. residential streets),

then the developer will be required to identify specific measures to address these impacts which will be secured through the use of planning obligations.

26. Where the transport impact of development proposals would be unacceptable according to the Borough's policies, the planning and highway authorities will consider what measures, if any, may be possible to mitigate this acceptably. National policy supports the use of such measures – including the use of contributions to improve accessibility through improved public transport or other appropriate forms of infrastructure – not necessarily those immediately confined to the site. These measures will be strictly and proportionally related to the development in question and will not be used to relieve existing problems unless the development would exacerbate an already unacceptable situation. Not every development can be made acceptable in transport terms; sometimes it might just be the wrong use in the wrong location or it might require a thorough redesign or a reduction in scale.

27. In a number of cases alterations to parking provision, improved accessibility by walking or cycling, design changes and/or associated on-site traffic management measures may resolve any concerns over a scheme. In certain cases conditions may be applied to resolve these problems. However some schemes may need wider co-ordinated measures and those required to make a scheme acceptable may lie outside the site and/or require a financial contribution for a related purpose.

28. In some cases schemes of any size may create an identifiable impact requiring a specific measure, e.g.

a new access road. However in others depending on the scale, nature and location of the scheme, it is likely that any proposal which will produce a net increase of vehicles could generate a requirement in terms of the measures outlined in the following sections.

29. Individual contributions that are levied may not in themselves be sufficient to fully fund a specific project but contributions derived from a number of smaller schemes may be pooled to achieve a particular measure.

### **Highway improvements**

30. New development proposals may create a need for off-site access or other improvements, as well as on-site requirements to provide roads, paths, cycle ways, lighting and links to the existing road network, for example to ensure the safe flow of traffic and pedestrian safety. Planning obligations will be used to secure the provision of, or financial contributions towards, off-site works required in connection with residential and non-residential development where they are required to make a scheme acceptable. In very exceptional circumstances major infrastructure works may be required, e.g. construction of a new road, but generally works will tend to include:

- upgrading of roads through reconstruction and resurfacing
- footway/pavement improvements, resurfacing and kerb alignments
- lighting
- junction improvements;
- traffic lights and pedestrian crossings
- bridge strengthening
- parking management zones and associated restrictions on nearby streets
- air quality monitoring
- Improvement of congestion hot spots
- traffic calming, 'Home Zones' and 'Safer Routes to Schools' initiatives

31. If highways are to be adopted for public maintenance on completion, then the Council may also seek to enter into an agreement with developers under Section 278 of the Highways Act 1980, or other appropriate powers, to secure payments towards maintenance and repair of infrastructure works that but for the development would not have been required.

### **On-Street Parking and Car Capping**

32. On new local access roads included as part of a development, parking may be provided on-street providing this does not have an unacceptable impact on road safety, emergency service access, amenity or traffic and so long as sufficient carriageway width remains.

33. Where a scheme will generate on-street parking which will result in these problems, and the introduction or extension of parking or waiting controls is proposed, then contributions to help bring these forward will be secured. If such controls are not practical then the development may be unacceptable or may need to be reduced in scale; or a residential development will only be approved as a 'car capped scheme'

34. In 'car capped' schemes planning obligations will prevent all occupants from being granted residential parking permits or the overall number of permits will be limited.

## **Public Transport**

35. The Council is committed to improving and encouraging the use of public transport, and will seek to ensure that major development proposals are accessible by public transport. Planning obligations may be used to secure the provision of, or improvements to, public transport infrastructure or services. The Council will assess all major developments in terms of their accessibility by public transport and levels of trip generation.

36. Where it is desirable that bus services should be able to pass into or through a development, and there is a realistic prospect of services being provided, then the layout should allow for the access, circulation, stopping and turning requirements of buses as well as including, if appropriate, suitably designed and located passenger shelters provided as part of or adjoining the development.

37. Public transport operates more efficiently and provides a better alternative to the car if it is protected from congestion and there are greater incentives to use it e.g. increased frequencies. Requirements may include:

- provision of new facilities such as bus shelters and stops
- passenger information systems
- contributions towards community transport provision or dedicated bus service, e.g. a works bus
- improvements to a bus service which passes near the site
- bus priority measures
- improvements to transport interchanges
- promotion of public transport

38. Existing bus routes may run close to a site but frequency levels may act as a disincentive to alter travel patterns and encourage modal change. Improved service level/frequency can be achieved by the use of a subsidy. In addition, if such infrastructure is to be managed by the Council (or other public body) then developers may be required to enter into a planning obligation to provide commuted maintenance payments to pay for the upkeep of the facility for a limited short term period. When considering developer contributions towards revenue support of public transport services, it should be borne in mind that any contribution might only be over the short term (e.g. 3 years) but the services provided needs to be viable in the medium term. The main purpose of revenue contributions therefore should be for 'pump priming'. Money is needed because the early stages of a development may not generate enough demand to justify services being provided in their own right. However, it is always necessary to provide public transport early in the life of a development to ensure that people have a choice of transport modes and do not become dependent on car use.

## **Cycling Facilities**

39. All development proposals are required to make appropriate provision for cyclists. The Council will, where necessary, seek to enter into a planning obligation with developers to secure the provision of, or contributions towards the provision or improvement of cycle ways and cycle parking facilities, including linkages to existing cycle and highway networks.

## **Pedestrian facilities**

40. The Council will, where necessary, seek to secure works to ensure acceptable pedestrian access to a site utilising existing routes or providing new ones. Such obligations may be sought in relation to any type

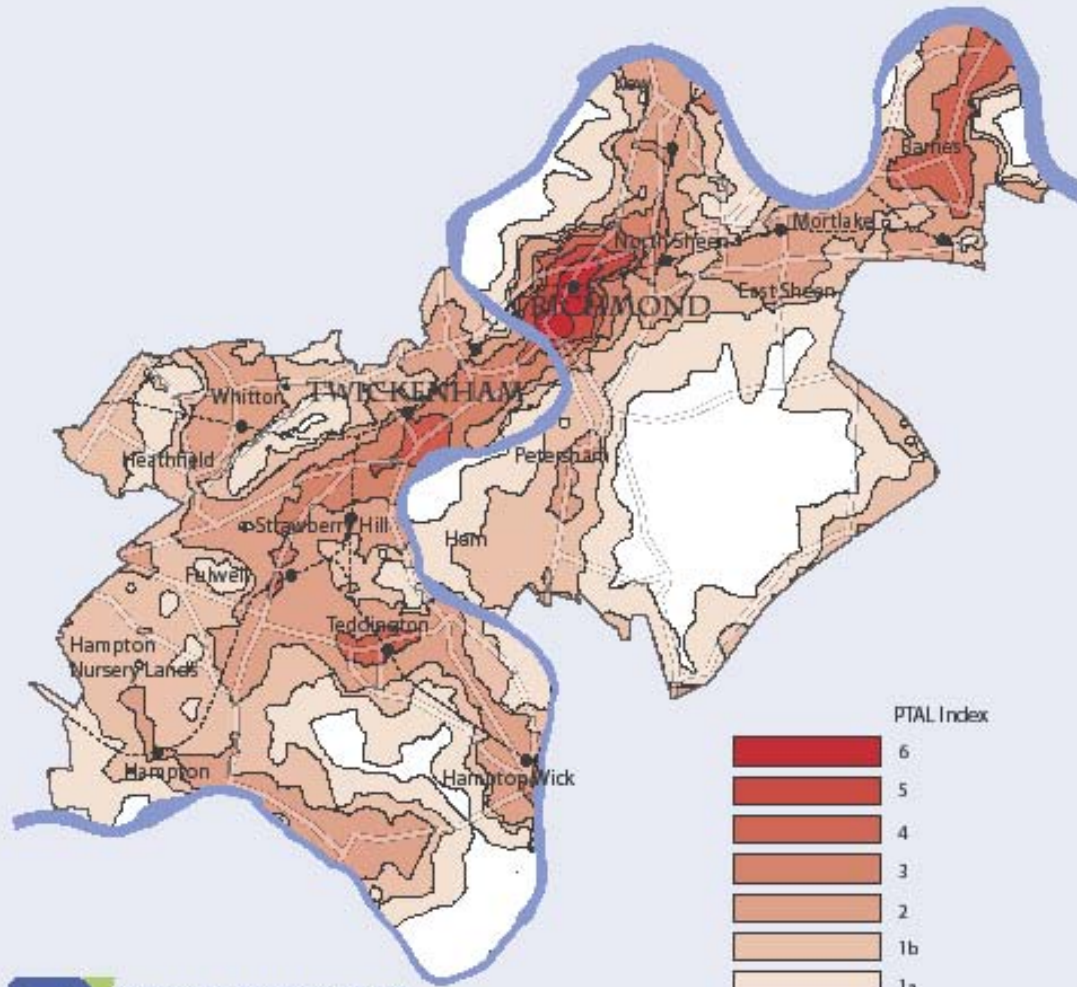
and size of development where people may be expected to arrive or depart on foot.

41. Pedestrian access should not be subservient to roads and vehicular routes and must be legible, safe, direct and convenient. In some instances where sites lie adjacent to, or impact on, public footpaths, towpaths or walks such as the Capital Ring, contributions may be sought to assist and encourage access and usage through signage, promotion and/or enhancement.

### **Use of Funds**

42. Funding will be ring fenced into a fund for expenditure on capital and associated revenue funding of transport related works. For negotiated schemes priorities will be as listed above for measures designed to deal as directly as possible with the transport impact of the proposal. For contributions-based schemes priorities will be as set out in the Borough's annual Local (transportation) Implementation Plan, which is subject to separate public consultation.

# PUBLIC TRANSPORT ACCESSIBILITY



If you need this leaflet in Braille,  
large print, audio tape, or another language,  
please contact us on 020 8891 7322 or minicom 020 8831 6001

Civic Centre, 44 York Street, Twickenham TW1 3BZ

Website: [www.richmond.gov.uk](http://www.richmond.gov.uk)

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

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

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

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

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

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

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