



## **LB Richmond upon Thames Local Plan**

### **Sustainability Appraisal Addendum of the Proposed Main Modifications**

***Consultation 22 December 2017 to 2 February 2018***

**December 2017**

## Introduction

1.1 The Publication Local Plan was submitted to the Secretary of State on 19 May 2017. Following the Hearing Sessions as part of the Examination in Public, which took place between 26<sup>th</sup> September and 12<sup>th</sup> October 2017, the Planning Inspector, has proposed some Main Modifications to the Plan.

Copies of the proposed Main Modifications are available as follows:

- On the Council's website at [www.richmond.gov.uk/local\\_plan\\_examination](http://www.richmond.gov.uk/local_plan_examination)
- In the Borough's main libraries
- At the Civic Centre reception, 44 York Street, Twickenham, TW1 3BZ

## Methodology

2.1 The Council is legally required under both European and UK law to prepare a Sustainability Appraisal (SA) of the Local Plan in order to help ensure that sustainability objectives including social, environmental and economic considerations are taken into account during all stages of the Plan preparation.

2.2 The process of the SA has been integral to the development of the LB of Richmond upon Thames (LBRuT) Publication Local Plan, with findings published and consulted upon alongside the Local Plan at each stage of its preparation. This has included the preparation of a series of SA documents including the Revised SA Scoping Report (PS-007)<sup>1</sup>, the Publication Local Plan SA (SD-003)<sup>2</sup> and the Council document (LBR-LP-005)<sup>3</sup> summarising the SA stages and iterations that informed the Local Plan that have been submitted to the [examination documents list](#). The SA is an iterative process and has been used to assess policy options and site selection to ensure that the plan contributes to the achievement of sustainable development, and any potential negative impacts on sustainability are minimised or effectively mitigated.

## Purpose of the Addendum Report to the Sustainability Appraisal

3.1 This note is an Addendum to the Sustainability Appraisal / Strategic Environmental Assessment Report submitted as part of the Local Plan examination. During the Local Plan examination hearings which took place in Sept/Oct. 2017, a number of main modifications to the Local Plan have been proposed by the Inspector. These main modifications are likely to be required to make the Local Plan "sound". This addendum to the SA provides an assessment as to whether the proposed main modifications to the Local Plan are likely to have significant effects on the sustainability objectives.

3.2 The proposed Main Modifications will be published for a six week period of consultation from 22 December 2017 to 2 February 2018. This Addendum considers the potential sustainability implications of each of the proposed

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<sup>1</sup> PS-007 Local Plan REVISED Sustainability Appraisal Scoping Report (May 2016)

<sup>2</sup> SD-003) Sustainability Appraisal Local Plan Publication version for consultation 4 January - 15 February 2017

<sup>3</sup> (LBR-LP-005) Appendix A - Summary of SA stages and iterations that have informed the Local Plan

changes/main modifications and presents an assessment of any potential sustainability implications which might arise.

## Results

The main modifications below are expressed by specifying the modification whereby additions are underlined and removals are ~~strikethrough~~. The page numbers and paragraph numbering below refer to the publication local plan (as [submitted](#)), and do not take account of the deletion or addition of text.

Change Ref. (Where given)	Policy Section or heading	Page/Paragraph	Proposed change	Sustainability Appraisal
MM1 Neighbourhood Planning				Reason for the change is in shaded text
	Introduction	p.4 paragraph 1.1.4	In the paragraph 1.1.4 of the Introduction, (Setting the Scene) amend the last sentence to read: "The Council will ensure that planning applications that accord with the policies in the adopted Local Plan and the London Plan (and where relevant, with policies in <u>emerging neighbourhood plans, such as</u> the Ham and Petersham Neighbourhood Plan once adopted) will be approved without delay, unless material considerations indicate otherwise."	Added for clarification and consistency with national policy. No need for further SA.
	Strategic Context	p.10-11	New paragraph and sub-heading after 2.1.11 and before "Village Planning" " <u>Neighbourhood Planning</u> <u>Neighbourhood Planning was introduced by the Localism Act 2011. It allows communities to influence the future of their local areas by preparing a Neighbourhood Development Plan for the area. Neighbourhood plans are led and written by the community, not the Council, and they have to be in general conformity with the strategic policies in the relevant local, regional and national planning policy documents and guidance. A neighbourhood plan that is prepared in line with the legal requirements and supported by a majority in a local referendum must be adopted by the Council. When adopted, a neighbourhood plan becomes part of the statutory development plan and will be taken into account alongside the Council's other plans when making decisions on planning</u>	To provide clarity on Neighbourhood Planning and Village Plan process and SPDs. This explanatory text does not necessitate altering the SA.

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		paragraph 3.1.4	<p>applications in that area. In this borough, the Ham and Petersham Neighbourhood Forum is preparing a <u>Neighbourhood Plan for its area.</u>"</p> <p>3.1.4 The Spatial Strategy reinforces the borough's context as an outer London Borough that is characterised by a high quality natural, built and historic environment with highly valued open landscape, parks, green spaces and opportunities for sport, recreation, culture and tourism. The overarching principles are to protect the unique local character (as set out in the Village Planning Guidance SPDs and in <u>neighbourhood plans, such as</u> in the emerging Ham and Petersham Neighbourhood Plan), maintain and enhance our open spaces as well as our heritage, achieve high levels of sustainability and ensure all communities have access to housing, employment opportunities, services and facilities.</p>	
	Local Character and Design Quality	p.28 Policy LP1	Amend the last paragraph of part A. of the policy LP1 to read: "All proposals, including extensions, alterations and shop fronts, will be assessed against <u>the policies contained within a neighbourhood plan where applicable, and</u> the advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design."	For clarification and consistency with national policy. This explanatory text does not necessitate altering the SA.
MM 2 Heritage Matters				
	Strategic Vision	p.12 paragraph: 2.2.1	Section 1 of the Local Plan Strategic Vision (Page 12, paragraph 2.2.1) to read as follows: " <u>Heritage assets including listed buildings and Conservation Areas , historic parks,</u> as well as Royal Botanic Gardens, Kew World Heritage Site ..."	The change will establish the important role that heritage assets play in defining the character of the borough and ensure that this is captured within the Strategic Vision, as agreed

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				in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008). This explanatory text does not necessitate altering the SA.
	Local Character and Design Quality	p.28 Policy LP 1	Change last sentence of LP 1 Part B as follows: "In sensitive areas, <u>such as Conversation Areas and relevant Character Areas as identified in the Village Planning Guidance SPDs</u> , rigid and gloss finish blinds will generally be unacceptable."	To clarify reference to sensitive areas. This explanatory text does not necessitate altering the SA.
	Designated Heritage Assets	p.33 Policy LP 3	Paragraph A. "The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. <u>Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal.</u> The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, Listed Buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens will be conserved and enhanced by the following means:"	The modifications reflect changes as set out in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008), and paras 132 and 133 of the NPPF. The strengthening of the policy will continue to have a very positive impact on borough centres, townscape and some possible benefits to the visitor economy.
	Designated Heritage Assets	p.33 Policy LP 3	<i>Point 2.</i> "Consent for demolition of Grade II Listed Buildings will only be granted in exceptional circumstances and for Grade II* and Grade I Listed Buildings in wholly exceptional circumstances following a thorough assessment of <del>their</del> <u>the justification for the proposal and the significance of the asset.</u> "	The modifications will not lead to a change in the S.A. as Heritage Assets, landscape and townscape, Sustainability Objective 7, are already strongly upheld.
	Designated Heritage Assets	p.34 Policy LP 3	Insert 2 further points under Section A of Policy LP 3 <u>"8. Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.</u> <u>9. Protect Scheduled Ancient Monuments, including their</u>	

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			<u>settings, by ensuring proposals do not have an adverse impact on their significance."</u>	
	Designated Heritage Assets	p.34 Policy LP 3	Amend criterion agreed as part of Statement of Common Ground as follows and update previous change in row above (formerly referred to as PE/LP3/3): <u>9. Protect Scheduled Ancient Monuments, including their settings, by ensuring proposals do not have an adverse impact on their significance.</u>	
	Designated Heritage Assets	p.33 Policy LP 3  Paragraph 4.3.9	Minor amendments to Part A as follows: 3. Resist the change of use of <del>L</del> isted <del>B</del> uildings where <u>their significance would be harmed</u> <del>this would materially harm their character and distinctiveness</del> , particularly where the current use contributes to the character of the surrounding area and to its sense of place.  Amend the first sentence of paragraph 4.3.9 of the supporting text as follows: 4.3.9 Listed <del>B</del> uildings are best used for their original purpose and therefore the Council will resist the change of use of a <del>L</del> isted <del>B</del> uilding where this would <del>materially</del> harm its <u>significance in relation to heritage interest and character and distinctiveness</u> . ....	
	Non- Designated Heritage Assets	p.36 Policy LP 4	Move the following policy text into the supporting text at a new paragraph after paragraph 4.4.3:  4.4.4 Applicants will be required to: 1) retain the character of Buildings of Townscape Merit, war memorials and any other non-designated heritage assets; 2) submit a Heritage Statement to assess the potential harm to, or loss of, the significance of the non-designated heritage asset, including from both direct and indirect effects; 3) describe the significance of the non-designated heritage	To take a consistent approach in LP3 and LP4. This advisory text does not necessitate altering the SA.

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			asset affected, including any contribution made by their setting; the extent of the relevant setting will be proportionate to the significance of the asset. Appropriate expertise should be used to assess a non-designated heritage asset; and 4) retain or restore the structures, features and materials of the asset, which contribute to its architectural integrity and historic interest.	
	Views and Vistas	p.37 Policy LP 5	In criterion 5., change as follows: " <u>Seek</u> improvements to views, vistas, gaps and the skyline; particularly where views or vistas have been obscured <del>will be encouraged where appropriate.</del> "  Amend criterion 6. c. of policy LP 5 as follows: " <u>are affected by development on sites within the setting of, or adjacent to, conservation areas and listed buildings.</u> " <del>"affect the setting of and from development on sites adjacent to Conservation Areas and Listed Buildings."</del>	As agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008). This amended text does not necessitate altering the SA.
MM3 Housing				
	New Housing	p.118 LP 34 Paragraph 9.1.4	Amend para as follows: This is reflected in the broad expected pattern of future housing land supply set out in <del>the</del> policy LP34.B which sets out <u>indicative ranges for the broad areas and are not to be regarded as any lower or upper limit, as the overall target is to be exceeded.</u>	To clarify that the approx. no. of units set out for the broad areas in LP34.B does not set any upper limit. This advisory text does not necessitate altering the SA.
		9.1.1	Add to para as follows: <u>The Council will, as necessary, undertake a full or partial review of the Local Plan in light of the content of any new adopted London Plan which will include an assessment of its identified constraints and opportunities affecting housing delivery.</u>	To clarify the approach to future circumstances. This advisory text does not necessitate altering the SA.
	Housing Mix	p.119	Amend the last sentence in Part A to read:	To clarify the assessment of



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	and Standards	LP 35 Paragraph 9.2.2	<p>... The housing mix should be appropriate to the <u>site-specifics of the location</u>.</p> <p>Amend the last sentence in paragraph 9.2.2 to read:            ... <u>To accord with LP35.A</u> the appropriate mix should be considered on a site by site basis having regard to...</p>	housing mix is considered on a site-by-site basis, and signpost this sentence in the supporting text which provides clarification on the assessment of mix to the location. This advisory text does not necessitate altering the SA.
	Housing Mix and Standards	LP 35	<p>Amend Part C:</p> <p>C. All new housing development, including conversions, <del>are required to comply with the Council's-</del> <u>should provide adequate external space standards. For houses a minimum total private space of 70sqm for 3 or more beds and 40sqm for 2 beds should be provided. To provide adequate private amenity space for flats, a minimum of 5sqm of private outdoor space for 1-2 person dwellings should be provided and an extra 1sqm should be provided for each additional occupant.</u> Purpose built, well designed and positioned balconies or terraces are encouraged where new residential units are on upper floors, if they comply with policy LP8 Amenity and Living Conditions. <u>Regard should be had to the Council's Residential Development Standards SPD as appropriate.</u></p>	<p>To ensure flexibility in implementation.</p> <p>The modified policy LP35 has been SA'd (see below). The re-appraisal shows a balance of impacts between that of providing greater numbers of housing and providing amenity or green space. The residential standards are set out in the SPD, to which developers should have regard.</p>
	Affordable Housing	p.121 LP 36	<p>Amend Part A.a to read:</p> <p>a. 50% of all housing units will be affordable housing, <del>with this 50% will comprise</del> a tenure mix of 40% <u>of the affordable</u> housing for rent and 10% <u>of the affordable</u> intermediate housing.</p>	<p>To provide clarity to LP36 A.a additional wording to specify the application of the tenure split.</p> <p>This advisory policy text does not necessitate a further SA</p>
	Affordable Housing	p.123 LP 36 Paragraph	<p>Amend Part B to read:</p> <p>B. A contribution towards affordable housing will be expected on all housing sites. <u>The following requirements apply:</u></p>	<p>To provide distinction in LP36.B.a the exact percentage sites are</p>

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		9.3.2	<p>a. <u>on all former employment sites at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.</u></p> <p>b. <del>_____ on all other sites capable of ten or more units gross and all former employment sites, at least 50% on-site provision.</del> Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.</p> <p><del>bc.</del> on sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out below and in the Affordable Housing SPD.</p> <p>Amend fourth sentence in paragraph 9.3.2 to read:  <u>A flowchart to follow, setting out the policy requirements and</u>  <del>†</del>The mechanism for assessing the contributions from individual sites, is set out in the Affordable Housing SPD</p>	<p>expected to deliver and requirements for on-site provision, along with a reference to the flowchart in the Affordable Housing SPD at paragraph 9.3.2.</p> <p>This advisory policy text does not necessitate a further SA</p>
	Affordable Housing	p.122 LP 36	<p>Amend Part C to read:  C. <u>In accordance with A and B, †the Council will seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes.</u></p> <p>Amend Part D to read:  D. Where a reduction to an affordable housing contribution is sought <u>from the requirements in A and B</u> on economic viability grounds</p>	<p>To demonstrate that C is offering additional guidance to assist in the implementation of Parts A and B and does not set any different policy requirement, and when D would apply. This is in accordance with London Plan Policy 3.12. This advisory policy text does not necessitate a further SA.</p>
	Infill, Backland and Backgarden Development	p.129 LP 39	<p>Amend Part A criteria (10) to read:  10. Result in no <u>unacceptable</u> adverse impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.</p>	<p>To clarify how Part B is applied on backgarden developments (along with Part A) and the potential</p>

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			<p>Amend Part B third sentence to read:            In <del>exceptional</del> <u>some</u> cases <del>where it is considered that</del> a limited scale of backgarden development may be <u>considered</u> acceptable <del>it should not have a significantly adverse impact upon</del> <u>if it complies with</u> the factors set out in A above.            Development on backgarden sites must be more intimate in scale and lower than frontage properties.</p>	<p>impacts assessed.            This reconsidered policy text does not necessitate a further SA.</p>
MM4 Building Heights				
	Building Heights	p.31 Policy LP 2	<p>"The Council will require new buildings, <u>including extensions and redevelopment of existing buildings</u>, to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights, by the following means..."</p>	<p>To clarify that if a redevelopment were proposed, improvements to the existing architectural design quality would be sought, as well as public realm benefits and the impact on the character and quality of the area would be assessed. This amended policy text does not necessitate altering the SA</p>
	Building Heights	p.31 Policy LP 2	<p>Amend criterion 1 as follows:            1. require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; <u>proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area;</u></p> <p>Delete criterion 6:</p>	<p>To clarify relationship between criteria 1 and 6.            This amended policy text does not necessitate altering the SA.</p>

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			5. refrain from using height to express and create local landmarks; <u>and</u> <del>6. resist buildings that are taller than the surrounding townscape other than in exceptional circumstances, such as where the development is of high architectural design quality and standards, delivers public realm benefits and has a wholly positive impact on the character and quality of the area; and</del> <del>7-6.</del> require full planning applications for any building that exceeds the prevailing building height within the wider context and setting.	
MM5 Amenity				
	Amenity and Living Conditions	P41. Policy LP 8	Delete the following text from policy:  <del>ensure there is a minimum distance of 20 metres between main facing windows of habitable rooms (this includes living rooms, bedrooms and kitchens with a floor area of 13sqm or more) to preserve the privacy of existing properties affected by the new development;</del>	To ensure flexibility and effectiveness.  A further SA of LP8 has been conducted (see below)
	Amenity and Living Conditions	p.41 Policy LP 8	Replace " <del>expected to comply with...</del> " with " <u>expected to have regard to the guidance set out within the Council's...</u> "	To indicate appropriately advice and guidance set out in SPD, as envisaged by national policy.
	Amenity and Living Conditions	Policy LP 8  p.42 Paragraph 4.8.8	Amend paragraph 4.8.8 to read:  Whilst there will be some impact from any new development, the test is one of harm in relation to the impact on habitable rooms, which includes all separate living rooms and bedrooms, plus kitchens with a floor area of 13sqm or more. The minimum distance <u>guideline</u> of 20 metres between habitable rooms within residential development is for privacy reasons; a greater distance may be required for other reasons, or a lesser	To clarify the references to minimum distances are a reasonable starting point in the borough context, to provide clear guidance for developers and existing occupants, while recognising an assessment will be made

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			<p>distance may be acceptable in some circumstances. <u>These numerical guidelines should be assessed on a case by case basis, since privacy is only one of many factors in site layout design; where the established pattern of development in the area (layout and height) may favour lesser distances.</u> The distance of 20 metres is generally accepted as the distance that will not result in unreasonable overlooking. Where principal windows face a wall that contains no windows or those that are occluded (e.g. bathrooms), separation distances can be reduced to 13.5 metres. <u>Where the impact of a building is on another within the same development site, measures can also be applied to minimise overlooking, such as splays, angles of buildings, obscure glazing etc.</u> A Supporting Planning Statement should set out justification for a reduction in these distances.</p>	<p>on a case by case basis.</p> <p>The further SA of the modified Policy LP8 shows many positive benefits for well-being, cohesive communities and neighbourliness.</p>
MM6 Environmental Matters				
	Local Environmental Impacts, Pollution and Land Contamination	p.44 Policy LP 10	<p>Delete 'where practicable' from LP 10, Part B, and insert secure'at least':</p> <p>"Developers should <del>commit to secure at least</del> 'Emissions Neutral' development <del>where practicable.</del>"</p> <p><i>Further to discussions in Hearing Session 5, to bring the policy requirement in line with Policy 7.14 of the London Plan, which states that development proposals should "be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality..."</i></p>	<p>This change indicates the importance of maintaining air quality. It reflects a requirement for development to be emissions neutral.</p> <p>It does not have any significant impacts on the findings of the previous SA Report (Publication Version); however, the commentary on the SA matrix on the assessment of the effect of LP10 has been</p>

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				slightly amended.
	Local Environmental Impacts, Pollution and Land Contamination	p.45 Para 4.10.5	<p>Insert within paragraph 4.10.5 the following:</p> <p>“The whole of the borough has been declared as an Air Quality Management Area (AQMA) and as such any new development and its impact upon air quality must be considered very carefully. <u>Strict mitigation will be required for any developments proposed within or adjacent to ‘Air Quality Focus Areas’.</u> An ‘Air Quality Focus Area’ is a location that has been identified as having high levels of pollution (i.e. exceeding the EU annual mean limit value for nitrogen dioxide) and human exposure. Air Quality Focus Areas are designated by the Greater London Authority. The Council will consider the impact of introducing new developments to areas already subject to poor air quality, and the impact on the new occupiers of that development, especially in sensitive uses such as schools.”</p> <p><i>Further to discussions in Hearing Session 5, to ensure that the Air Quality Focus Areas, as designated by the Greater London Authority, and updated on a regular basis, are referred to within the supporting text.</i></p>	<p>This refers to the GLA designated Air Quality Focus Areas in the supporting text and reinforces the requirements for strict mitigation in or adjacent to them.</p> <p>It does not have any significant impacts on the findings of the previous SA Report (Publication Version); <b>no amendment</b> will be required.</p>
	Local Environmental Impacts, Pollution and Land Contamination	p.45 Policy LP10	<p>Amend last sentence of LP 10 as follows:</p> <p><u>Where applicable and considered necessary, the Council will may seek a bespoke charge specific to the proposal to cover the cost of monitoring the CMS; a discount may be applied if the applicant/developer uses the Council’s Building Control services.</u></p> <p><i>This was added further to discussions in Hearing Session 5, to ensure that monitoring fees are specific to a proposal and in line with CIL regulations.</i></p>	<p>It does not have any significant impacts on the findings of the previous SA Report (Publication Version); <b>no amendment</b> will be required.</p>
MM7 Green Infrastructure				
	Green	p.52	Add a cross reference to Chapter 4 after the 2 <sup>nd</sup> sentence of	As agreed in Statement of

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	Infrastructure	paragraph 5.1.1	<p>paragraph 5.1.1 as follows:</p> <p><u>"The need to protect the historic significance of the borough's exceptional landscapes is set out in Chapter 4: Local Character and Design."</u></p>	<p>Common Ground with Historic England (7 September 2017) (LBR-LP-008). This explanatory text does not necessitate a further SA.</p>
	Green Infrastructure	p.55 Policy LP13	<p>Omit the criteria of Part B of LP13.</p> <p>B. It will be recognised that there may be exceptional cases where inappropriate development, such as small scale structures <u>for essential utility infrastructure</u>, may be acceptable, <del>but only if it:</del></p> <ol style="list-style-type: none"> <li><del>1. Does not harm the character and openness of the Green Belt or Metropolitan Open Land;</del></li> <li><del>and</del></li> <li><del>2. Is linked to the functional use of the Green Belt or Metropolitan Open Land, or supports outdoor open space uses;</del></li> <li><del>or</del></li> <li><del>3. Is for essential utility infrastructure and facilities for which it needs to be demonstrated that no alternative locations are available and that they do not have any adverse impacts on the character and openness of the Green Belt or Metropolitan Open Land.</del></li> </ol> <p>Amend supporting text as required at para 5.2.4</p>	<p>To clarify the policy and to ensure consistency with national policy.</p> <p>A further SA of LP13 has been conducted in light of the amended wording. The policy remains favourably sustainable with mostly positive environmental and social impacts.</p>
		p.56 Para 5.2.8	<p>Amend para to read:</p> <p>5.2.8 Local Green Space, <u>as to be</u> identified on the Policies Map, is green or open space which has been demonstrated to have special qualities and hold particular significance and value to the local community which it serves. <u>New areas of Local Green Space designation can only be identified when a plan is being prepared or reviewed.</u></p>	<p>To ensure clarity and effectiveness consistent with national policy.</p> <p>This explanatory text does not necessitate a further SA.</p>

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		5.2.10	Delete last three bullet points of para 5.2.10	
MM 8 Open Space				
	Other Open Land of Townscape Importance	p.57 Paragraph 5.3.1	Amend paragraph 5.3.1 as follows: "The purpose of this policy is to safeguard open land of local importance and ensure that it is not lost to other uses without good cause. Areas designated as Other Open Land of Townscape Importance (OOLTI) form an important part of the multi-functional network of Green Infrastructure and they can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. <u>New areas for OOLTI designation can only be identified when a plan is being prepared or reviewed.</u> The <u>existing</u> designated areas are shown on the <u>Proposals Policies Map.</u> "	To confirm the process for new OOLTI designations is through the Local Plan process.  This explanatory text does not necessitate a further SA
	Other Open Land of Townscape Importance	p.57 Paragraphs 5.3.3 and 5.3.5	Delete paragraphs 5.3.3 and 5.3.5 of the supporting text of the OOLTI policy as follows: <del>5.3.3 This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value, and therefore merit protection.</del> <del>5.3.5 This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value, and therefore merit protection.</del>	To confirm the process for new OOLTI designations is through the Local Plan process.  This explanatory text does not necessitate a further SA.
	Other Open Land of Townscape Importance	p.57 Paragraph 5.3.4	Add to the last bullet point the following: <ul style="list-style-type: none"> <li>Value for biodiversity and nature conservation <u>and meets one of the above criteria.</u></li> </ul>	To clarify the criteria in relation to biodiversity and nature conservation is not a sole criterion in defining OOLTI. This explanatory text does not necessitate a further SA.



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MM9 River Corridors				
	River Corridors	p.64 Policy LP 18	The following change is proposed to LP18:  - Public Access C. c. to read as follows: "Provide new public access to the riverside <del>and the foreshore</del> where possible, <u>and maintain existing points of access to the foreshore subject to health and safety considerations</u> . There is an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside <del>and foreshore</del> ."	To address the PLA's concern in relation to safety, as agreed in Statement of Common Ground with Port of London Authority (31 August 2017) (LBR-LP-007). The SA of the amended Policy LP18, has more positive impacts on sustainability and is beneficial in all areas; environmental social and economic.
	River Corridors	p.64 Policy LP 18	The Council to consider adding a new criterion C.d. to read as follows: " <u>Provide riparian life-saving equipment where required and necessary.</u> "	
MM10 Climate Change				
	Flood Risk and Sustainable Drainage	p.73 Policy LP21	Section B Basements and subterranean developments, 2 <sup>nd</sup> row of table: "In areas of Extreme, Significant and Moderate Breach Hazard (as set out in the Council's SFRA): New basements: restricted to Less Vulnerable / Water Compatible use only." add after – " 'More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed. <u>Bedrooms at basement level will not be permitted.</u> " - add after "'Highly Vulnerable' <u>such as self-contained basements/bedrooms</u> uses will not be permitted."	To ensure the policy clearly reflects the evidence and recommendations as set out in the Council's SFRA and/or in national planning policy and guidance  A further SA of LP21 has been conducted (see below).
	Flood Risk and Sustainable Drainage	P.73 Policy LP21	Section B. Basements and subterranean developments, 2 <sup>nd</sup> row of table, amend as follows: "In areas of Low or No breach Hazard (as set out in the	

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			Council's SFRA): <ul style="list-style-type: none"> <li>New basements: if the Exception Test (<u>where applicable</u>) is passed, basements may be permitted for residential use where they are <u>not</u> self-contained or used for bedrooms.</li> </ul>	
	Flood Risk and Sustainable Drainage	p.73 Policy LP21	Section B. Basements and subterranean developments , 3 <sup>rd</sup> row of table concerning Flood Zone 2, amend as follows: <ul style="list-style-type: none"> <li>New basements: if the Exception Test (<u>where applicable</u>) is passed, basements may be permitted for residential use where they are <u>not</u> self-contained or used for bedrooms.</li> </ul>	For clarity and to reflect national policy guidance.
	Flood Risk and Sustainable Drainage	p.75 Flood Risk Assessments paragraph: 6.2.8	Add after paragraph 6.2.8: <u>"All new development needs to take account of the latest climate change allowances. This should be included as part of the Flood Risk Assessment process. This will help minimise vulnerability and provide resilience to flooding in the future."</u>	To ensure the policy clearly reflects the evidence and recommendations as set out in the Council's SFRA and/or in national planning policy and guidance.
	Flood Risk and Sustainable Drainage	p.72 Policy LP 21	Amend second paragraph of LP 21 as follows:  In <u>Flood Zones 2 and 3</u> <del>areas at risk of flooding</del> , all proposals on sites of 10 dwellings or more or 1000sqm of non-residential development or more, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted."	To clarify that this requirement applies in Flood Zones 2 and 3. The further SA of the modified policy LP21 shows that this policy should make homes and communities more resistant &/or resilient to flooding now and in the future taking into account the effects of climate change.
MM11 Sustainable design and construction				
	Sustainable design and construction	p.78 Policy LP22	Replace " <del>to comply with...</del> " with "to complete..." in Policy LP 22 Part A. point 1 to read: "Development of 1 dwelling unit or more, or 100sqm or more of non-residential floor space	For clarity and to reflect S38(6) of the Town and Country Planning Act 1990

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			(including extensions) will be required <del>to comply with</del> <u>to complete</u> the Sustainable Construction Checklist SPD. A completed Checklist has to be submitted as part of the planning application.	(as amended).  The modifications add clarity and consistency, and reflect the requirements set out in the table of paragraph 6.3.24. Consequently the amendments do not necessitate a further SA.
	Sustainable design and construction	p.79 Policy LP22	Replace " <del>to comply with...</del> " with " <u>to complete and submit...</u> " in Policy LP 22 Part E. 2 <sup>nd</sup> sentence to read: "Householder extensions and other development proposals that do not meet the thresholds set out in this policy are encouraged <del>to comply with</del> <u>to complete and submit</u> the Sustainable Construction Checklist SPD as far as possible, and opportunities for micro-generation of renewable energy will be supported in line with other policies in this Plan."	
	Sustainable design and construction	p.79 Policy LP22	Amend Part B criterion 3 to read: 3. All <del>major</del> non-residential buildings <u>over 100sqm</u> should achieve a 35% reduction. From 2019 all major non-residential buildings should achieve zero carbon standards in line with London Plan policy.	
MM12 Waste Management				
	Waste management	p.85 Policy LP24	Amend Policy LP24 point 1 as follows: "All developments, including conversions and changes of use are required to provide adequate refuse and recycling storage space and facilities, which allows for ease of collection and which residents and occupiers can easily access, in line with the <u>guidance and advice set out in</u> the Council's SPD on Refuse and Recycling Storage Requirements."	For clarity and to reflect S38(6) of the Town and Country Planning Act 1990 (as amended)  To clarify the approach to existing waste sites.
	Waste management	p.86 Paragraph 6.5.3	Amend paragraph 6.5.3 to read: " This policy ensures that all development proposals provide adequate refuse and recycling storage space and facilities to serve new developments, in line with <u>the guidance and advice set out in</u> the Council's SPD on Refuse and Recycling Storage Requirements	As existing operations may cease and new waste sites may be permitted, it has been agreed with the other WLWP authorities to include

Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
	Waste management	p.86	Add new paragraph after paragraph 6.5.6 as follows: <u>The existing waste management sites as set out in Appendix 2 of the West London Waste Plan were identified at a snapshot in time. This list can be revised with new waste sites, permissions and licences granted by the Council or Environment Agency. The Council carries out regular monitoring of existing waste sites, the results of which, including maps of operational sites, are published as part of the Authority's Monitoring Report.</u>	updates to existing waste management sites within the Authority's Monitoring Report (AMR), which is available at <a href="https://www.richmond.gov.uk/authority_monitoring_report">https://www.richmond.gov.uk/authority_monitoring_report</a> , and which identifies on a regular basis if any site is no longer in operational use for waste management purposes. In addition, the AMR includes maps to clarify the current extent of each operational site where this is known. This explanatory text does not necessitate altering the SA
MM13 Borough Centres				
	Development in Centres	p.88 Policy LP25	Add comma to LP 25.A.3 to read: .... For retail developments, including extensions, of over 500sqm gross, the Council will require a Retail Impact Assessment. ...	To clarify that all developments over 500sqm will need a RIA, not just extensions. This advisory text does not necessitate altering the SA
	Retail Frontages	p.97 Policy LP 26 F	F. Where a proposal involves a change of use not supported by policy, the Council will require satisfactory evidence of full and proper marketing of the site for <del>at least 2 years</del> . The applicant will be <u>expected</u> <del>need</del> to undertake marketing in line with the requirements set out in Appendix 5.  3. The Council will require satisfactory evidence of full and	To ensure effective implementation.  The Council has considered the modifications and referral to Appendix 5 in LP26 and LP27 and

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		P. 99 Policy LP 27 A.3	proper marketing <del>for a minimum of 2 years</del> where a proposal does not meet the above criteria. The applicant will <u>be expected</u> <del>need</del> to undertake marketing in line with the requirements set out in Appendix 5.	concluded that no further SA of the policies is required.
		Policy LP 27 B	B. The Council will resist the loss of public houses. Before accepting the loss of any public house the Council requires satisfactory evidence of full and proper marketing normally for at least 2 years for a full range of appropriate uses (see policy LP 28 Social Infrastructure). The applicant will <u>be expected</u> <del>need</del> to undertake marketing in line with the requirements set out in Appendix 5.	
MM14 Community Facilities				
	Social and Community Infrastructure	p. 104 Policy LP28	Add a new paragraph after 8.1.8 to read: <u>The Council's Indoor Sports Facility Needs Assessment highlights the need for new facilities within the borough. Where possible and feasible, such provision should be provided on-site in line with the Council's Indoor Sports Facility Needs Assessment.</u>  Add a new paragraph after 8.1.10 to read: <u>Proposals that could result in the loss of an existing indoor sport facility will also be assessed against the Council's Indoor Sports Facility Needs Assessment and the criteria as set out in the NPPF. Early engagement with Sport England is encouraged where a proposal affects an existing indoor sport facility.</u>	To address Sport England's comments to deal specifically with new indoor sports facilities and the Needs Assessment, and specifically with the potential loss of such facilities.  A further SA of LP28 (see below) has been conducted showing largely positive impacts through protecting existing uses and considering alternative sporting, social or community uses.
MM15 Education and Training				
	Education and	p.107	Add after first sentence:	To clarify the requirement

Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
	Training – Local Employment Agreements	LP 29 Paragraph 8.2.14	... <u>Securing the skills to support residents into sustainable employment is a key priority for the Council to support the local economy, to raise the bar further for those with higher levels of skills than London averages and make sure some residents with lower skills are not missing out economically.</u> ...	for LEAs is considered necessary, directly related, and fairly related in scale and kind to the development. A LEA provides the means to manage the development related job opportunities arising from the proposal, and will cover how the applicant will work with the Council in order to maximise employment and training opportunities for local people and businesses.
	Education and Training – Local Employment Agreements	p.107 LP 29 Paragraph 8.2.15	<p>Add to end of paragraph 8.2.15:  <u>... Such an agreement can make use of existing schemes, such as Way2Work, Construction Training Initiative, schemes run by Registered Providers and developers, provided these manage the development related job opportunities.</u></p> <p><u>The details of the LEA will be subject to negotiation, tailored to site specific circumstances and proportionate to the scale of development proposed, and require developers to use reasonable endeavours to incorporate in their relevant contracts. The contents are expected to cover:</u></p> <ul style="list-style-type: none"> <li>• <u>Forecasting of job opportunities</u></li> <li>• <u>Notification of job vacancies</u></li> <li>• <u>Local labour target</u></li> <li>• <u>Jobs brokerage and skills training</u></li> <li>• <u>Apprenticeships and work experience</u></li> <li>• <u>Use of local suppliers</u></li> <li>• <u>Delivery of specific LEA targets.</u></li> </ul> <p><u>A developer can set out justification as to why it may not be possible to deliver any of the requirements highlighted. Further guidance to assist implementation will be provided in a forthcoming SPD.</u></p>	<p>To guide the practicalities for implementation of the requirement for LEAs, ahead of further SPG guidance.</p> <p>The advisory text changes have led to a further SA of the policy (see below), which shows added social benefits to residents from the use of LEAs and a more positive policy in terms of SA objectives.</p>
MM16 Health and Well Being				
	Social and Community	p.104 LP 28	Amend paragraph 8.1.10 point (1): ... Where the application relates to the loss of a health facility,	To clarify clearly that Policies LP28 and LP30 will

Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
	Infrastructure and Health and Wellbeing	Paragraph 8.1.10  p.111 LP 30 Paragraph 8.3.17	<p>the requirements of LP 30 will also need to be addressed and written agreement from the Richmond Clinical Commissioning Group, NHS England or other relevant health body must be provided...</p> <p>Add to end of paragraph 8.3.17 to read: .... Applications for new or loss of health and social care facilities will be considered in line with the criteria of policy LP 28 in 8.1 'Social and Community Infrastructure' <u>and paragraph 8.1.10 sets out that written agreement of the relevant health body must be provided to assess the loss of any existing health facilities.</u></p>	<p>be considered for proposals involving the loss of any health facilities.</p> <p>This clarification in the text does not necessitate further SA of LP30.</p>
	Health and Wellbeing	p.108 Policy LP30	add new point 7. within main policy section A under point 6. to read as follows: " <u>7. Active Design which encourages wellbeing and greater physical movement as part of everyday routines.</u> "	To be consistent with the health and wellbeing objectives of the NPPF. No further SA of the Policy is required.
	Health and Wellbeing	P.108 Policy LP 30  8.3.13/14/15	<p>Amend LP 30 B. bullet point 2:</p> <p>The Council will <u>manage</u> <del>refuse</del> proposals for new fast food takeaways (A5 uses) located within 400 metres of the boundaries of a primary or secondary school in order to <u>promote the availability of healthy</u> <del>restrict the availability of unhealthy</del> foods.</p> <p>Amend para 8.3.13/14/15</p> <p>8.3.13 There is an emerging obesity issue in the borough, particularly in children. <del>One established method of addressing obesity is by restricting access to unhealthy foods, particularly fast food takeaways.</del> Childhood obesity amongst school age children is a concern as evidence suggests that obese children are more likely to be obese adults and are at an increased risk of developing</p>	<p>To clarify the objectives of the Council and to be justified with regard to the available evidence.</p> <p>The changes concern access to fast food takeaways, one item within a cross-cutting, comprehensive policy for health and well-being. The policy continues to promote a pattern of land uses and development that supports a healthy lifestyle. No further SA of the Policy is required.</p>

Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
			<p>further health difficulties. Access to fast food takeaways <del>detracts from</del> <u>can influence</u> the ability <u>of individuals</u> to adopt healthy lifestyles and <u>have the potential to undermine</u> <del>undermines</del> healthy eating initiatives that may be in place at the school. Therefore this policy focuses particularly on <u>managing</u> <del>restricting</del> access to fast food takeaways in close proximity to schools.</p> <p>8.3.14 The Council will <del>refuse</del> <u>consider</u> proposals for fast food takeaways located within 400 metres of the boundaries of a primary or secondary school <u>with regard to the nature of the proposal, its contribution to healthy food availability and its relationship to the existing provision of A5 outlets.</u> 400m is a 5-10 minute walk and it is suggested that this is the maximum distance that students would walk to and back from in their lunch break. Outside of these 400m '<del>restriction</del> management' zones, applications for fast food takeaways will be considered in line with other policies in <del>this</del> <u>the development</u> plan.</p> <p>8.3.15 The following map shows the existing schools within the borough (as of May 2016) and the associated 400 metre buffer area, which are the '<del>restriction</del> management' zones for fast food takeaways: [Map]</p>	
		7.2.10	<p>Amend para 7.2.10 In addition to the areas to subject to restrictions listed in the table on 'Use Class to be restricted' as set out in the policy above, the Council will <u>manage</u> <del>not permit development of</del> new fast food takeaways (A5 uses) located within 400 metres of the boundaries of a primary or secondary school. This is in order to <del>restrict</del> <u>support the promotion</u> <del>the availability of</del> unhealthy foods to school-age children...</p>	<p>To clarify the objectives of the Council and to be justified with regard to the available evidence. This is a cross reference found in the text of Retail Frontages Policy LP26. No further SA is necessary.</p>
MM17 Open				



Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
Space and Recreation				
	Public Open Space, Play Space, Sport and Recreation	p. 111 Policy LP31	Amend first sentence of Part B as follows: "B. The Council will require all major development proposals in the borough to meet the Public Open Space, <del>and</del> play space, <del>and playing fields and ancillary sport facilities</del> needs arising out of the development by requiring the following:"	To ensure the needs as set out in the borough's Playing Pitch Strategy are addressed as agreed in Statement of Common Ground with Sport England (21 September 2017) (LBR-LP-024).  This policy seeks to protect all public and private sports grounds including playing fields, playing pitches, recreational areas, courts and greens as well as private open space in recreational use. It also seeks to maintain, and where possible improve, the children's and young people's play facilities in the borough and the quality and provision of Public Open Space, particularly in areas identified as being deficient. The amended policy text emphasises the borough's playing pitch strategy but does not add to the already positive impacts on health & well-being objectives in the sustainability appraisal. Therefore no further SA was carried out.
	Public Open Space, Play Space, Sport and Recreation	p. 111 Policy LP31	Add new criterion 3 of Part B as follows: <u>"3. Playing fields and sport facilities: Applicants should assess the need and feasibility for on-site provision of new playing fields and ancillary sport facilities in line with the borough's Playing Pitch Strategy."</u>	
	Public Open Space, Play Space, Sport and Recreation	p. 111 Policy LP31	Amend criterion 3 of Part B as follows: <del>3.</del> <u>4. Where on-site provision of Public Open Space, or play space or new playing fields and ancillary facilities is not feasible or practicable, the Council will expect existing surrounding facilities and spaces to be improved and made more accessible to the users and occupiers of the new development through, for example, improved walking and cycling links or enhancements of play space or existing playing fields and associated sport facilities. Financial contributions will be required to either fund off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development."</u>	
MM 18 Employment				

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	Employment and local economy	p.132 LP 40	Rewording of criterion 4 to read as follows: 4. <u>In exceptional circumstances, Mixed use development proposals which come forward for specific employment sites</u> should retain, and where possible enhance, the level of existing employment floorspace. The inclusion of residential use within mixed use schemes will not be appropriate where it would <del>be incompatible with, or adversely impact on,</del> the continued operation of other established employment uses within that site or on neighbouring sites.	To provide clarity that this relates to specific employment sites where under exceptional circumstances mixed use development may be required for viability purposes. This clarification in the policy text does not necessitate altering the SA.
MM 19 Offices				
	Offices	p.133 Policy LP41	Amend 2b of Part A to read as follows: 2b) Mixed use including other employment generating or community uses. <del>Such sites should</del> and residential which maximises the amount of affordable housing provided as part of the mix; ....	To clarify the implementation in relation to mixed use development and affordable office space and for reasons of effectiveness.
		P. 133 LP 41	C. In the designated Key Office Areas, as shown on the <del>Proposals</del> Policies Map, net loss of office floorspace will not be permitted. Any development proposals for new employment or mixed use floorspace <del>should will be required to</del> contribute to a net increase in office floorspace <u>where feasible</u> . Criteria 1 and 2 in A (above) do not apply to the Key Office Areas.	This clarification in the policy text does not necessitate altering the SA.
	Offices	p.134 LP 41	Amend criterion 5 of Part D to read as follows: 5. The Council will require the provision of affordable office space within all major developments with over 1000sqm of office space; this will be secured through Planning Obligations <del>in line with the Planning Obligations SPD.</del>	
	Offices	p.135 paragraph 10.2.6	Add a first sentence and amend the supporting text at paragraph 10.2.6 to read as follows: <u>"The types of office buildings most at risk from conversion have relatively small floorplates.</u> In order to maximise the choice of resources and maintain a stock of cheaper	To provide further necessary clarity on low cost office space and on affordable workspace in the written justification.

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			<del>accommodation</del> lower cost office stock to provide cheaper accommodation to the borough's high percentage of Small and Medium Enterprises (SMEs), the Council seeks to discourage the unnecessary redevelopment of <del>these</del> premises. "	This clarification in the text does not necessitate altering the SA.
	Offices	p.136 paragraph 10.2.12	Amend from penultimate sentence of paragraph 10.2.12 onwards to read as follows: "... Affordable workspace is considered to have a rent and service charge of less than 80% of comparable <u>local</u> market rates. <u>It is acknowledged that market rates will vary according to a range of factors such as location within the borough, the quality and type of office stock.</u> Affordable office provision, <del>including appropriate rental values,</del> will be agreed and secured through Planning Obligations in line with the Council's Planning Obligations SPD. <u>A revised Planning Obligations SPD will contain guidance to assist in the implementation of policy requirements on affordable employment space, including guidance on design and financial arrangements.</u>	
MM 20 Industrial Land				
	Industrial Land and Business Parks	p.137 LP 42	Amend Part A criterion 2b to read: 2b) Mixed use including other employment generating or community uses, <u>and residential providing it does not adversely impact on the other uses and maximises the amount of affordable housing delivered as part of the mix.</u>	To clarify the implementation in relation to mixed use development. This clarification in the policy text does not necessitate altering the SA.
	Industrial Land and Business Parks	p. 137-138 LP 42	Change wording in Part B criterion a to read: a) loss of industrial floorspace will be resisted unless <u>appropriate full, on-site</u> replacement floorspace is provided;  Change wording in Part B criterion c to read:	To clarify the implementation in relation to mixed use development in LILBPs A further SA of Policy LP42 was

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		P.139 Paragraph 10.3.8	<p>c.) proposals for non-industrial uses will be resisted where the introduction of such uses would <del>have an adverse impact on the continued operation of the existing services</del> <u>adversely impact on industrial activities.</u></p> <p>Amend text to read:</p> <p>10.3.8 In the locally important industrial land and business parks loss of industrial space will be strongly resisted unless <u>appropriate full, on-site</u> replacement provision is provided. <u>Appropriateness will be determined with particular regard to site circumstances and the industrial/employment needs of the Borough.</u></p>	<p>carried out. The policy has an overall positive impact in terms of the local economy and business opportunities and services for local residents. Environmental and amenity impacts of industrial proposals should be reduced to acceptable levels and significant loss of industrial provision should be unlikely as it is not appropriate given the needs of the borough.</p>
	Industrial Land and Business Parks	p. 138 Policy LP 42	<p>Amend Part C to read: New Industrial space C. Development of appropriate scale industrial uses, and improvement and expansion of such premises, is encouraged. New industrial space should be flexible and adaptable for different types of <del>uses</del> <u>activities</u> and suitable to meet future needs, especially to provide for the requirements of local businesses.</p>	<p>For clarity and effectiveness</p> <p>This clarification in the policy text does not necessitate altering the SA.</p>
MM 21 Parking				
	Parking Standards and Servicing	p. 147 Paragraph 11.2.3	<p>Modifications to paragraph 11.2.3:</p> <p>11.2.3 Developers may only provide fewer parking spaces, including car free schemes, if they can <del>show</del> <u>demonstrate as part of a Transport Statement or Transport Assessment with supporting survey information and technical assessment</u> that there would be no <u>unacceptable</u> adverse impact on <u>on-street parking availability</u>, amenity, street scene, road safety or emergency access in the <del>vicinity</del> <u>surrounding area, as a result of the generation of unacceptable overspill of on-street parking</u></p>	<p>To clarify how the flexibility in the parking standards is being applied.</p> <p>This clarification in the explanatory text does not necessitate altering the SA.</p>

Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
			<u>in the vicinity.</u> In general it is expected that in PTAL areas of <u>0-3</u> <del>1-4</del> the standards should be met, <del>but in</del> <u>In</u> PTAL areas of <u>5-4-6</u> , such as Richmond and Twickenham centres, parking provision at a level lower than the standard <del>or a car-free development, supported for example by a car club,</del> may be appropriate where this can be demonstrated as acceptable, <u>taking account of local characteristics, availability of sustainable modes of travel and public transport provision, and availability of on-street parking spaces in exceptional circumstances.</u>	
	Parking Standards and Servicing	p. 147 Paragraph 11.2.2	Amend last paragraph of 11.2.2 as follows: 11.2.2 This restriction would be secured by <del>a Planning Obligation</del> <u>excluding the address from the schedule of streets in the relevant road traffic order that created or creates the Controlled Parking Zone in which the property is situated, by restricting under section 106 of the Town and Country Planning Act 1990 the disposal of an interest in relevant properties unless a person disposing advises the person acquiring of the non-availability of residents or business on-street parking permits and/or through Section 16 of the Greater London Council (General Powers) Act 1974 (or any statute revoking or re-enacting that Act).</u>	To clarify the legal mechanisms for securing a limitation of parking permits.  This clarification in the explanatory text does not necessitate altering the SA.
MM 22 Monitoring and Appendices				Changes are for clarity. No requirements for SA
	Implementation	P.199 13.5 Monitoring	Add new paragraph following 13.5.6:  <u>It is recognised that over the lifetime of the Plan, external circumstances will change. Whilst the Plan is overall considered to be flexible, the NPPF allows for Local Plans to be reviewed in whole or in part to respond flexibly to changing circumstances. Therefore, external factors such as changes in national policy,</u>	To clarify review in the Plan triggers and review mechanisms.

Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
			<u>a London Plan review or changes in local evidence and need may trigger a review of this Local Plan. The programme for the preparation of Development Plan Documents is set out within the Council's Local Development Scheme, which is regularly reviewed and updated.</u>	
	Implementation	P.197 Paragraph 13.3.5	Amend paragraph 13.3.5:  ... It should be noted that Planning Obligation monies will not be secured for projects or items already on the Council's Regulation 123 List, <u>and will be subject to the pooling restrictions as set out in the CIL regulations.</u>	To refer appropriately to the pooling restrictions for clarity.
	Appendix 5 – Marketing Requirements	p.220 paragraph 18.0.2	Amend paragraph 18.0.2 in Appendix 5 to read: This appendix sets out the details that should be provided to enable officers to assess the acceptability or otherwise of the marketing undertaken. <u>The Council's assessment will consider the overall length, type and quality of the marketing to come to a view, and if the applicant/agent puts forward any justification for any shortcomings in the marketing (e.g. the use of only one specialist website rather than a range of generic websites due to the nature of the existing employment use, or that a marketing board was not used because of advertisement controls) these will be considered, however the expectation is the below requirements should be fully addressed.</u>	To clarify the expectations of the Council's marketing requirements.
	Appendix 7 - Glossary		Amend the existing OOLTI definition in the glossary as follows:  "Other Open Land of Townscape Importance ( <u>OOLTI</u> ) Open areas, which are not extensive enough to be defined as Metropolitan Open Land, but act as pockets of greenery of local significance, contribute to the local character, and are valued by residents as open spaces in the built up area. These areas can include public and private sports grounds, some school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. <u>OOLTI is a</u>	To clarify the distinction between OOLTI and LGS.

Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
			<p><u>local policy and new designations are made by the Council as part of the plan-making process. This is different to ‘Local Green Space’ (see definition above), which national policy makes provision for.”</u></p> <p>Add new definition to glossary for ‘Local Green Space’ as follows:  <u>“Local Green Space (LGS)</u>  <u>Local communities can identify green or open space which is of special quality and holds particular significance and value to the local community which it serves, in line with paragraphs 76 to 78 of the National Planning Policy Framework (NPPF). Local Green Spaces can only be designated when a local plan or neighbourhood plan is prepared or reviewed. National policy on Green Belt applies to any designated Local Green Space.”</u></p>	
MM 23 Site Allocations				
	Site Allocations	p.161 SA 7 Strathmore Centre	<p>Include text in bullet point 5 with regard to the provision of outdoor space and parking to read as follows:  “Proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way, <u>including the provision of appropriate outside space and parking related to the childcare services</u>, or elsewhere in a convenient alternative location accessible to the current community it supports.”</p>	<p>To ensure justification and clarity of approach.</p> <p>This clarification in the explanatory text does not necessitate altering the SA.</p>
	Site Allocations	p.162 SA 8 St. Mary’s University, Strawberry Hill	<p>At the beginning of the 2<sup>nd</sup> paragraph of Policy SA 8 add “and/or” to the 1<sup>st</sup> sentence:  “A Masterplan <u>and / or</u> site development brief, ...”</p>	<p>To provide greater clarity, as agreed in Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).</p>
	Site	p.162	Delete “ <del>very</del> ” from the 4 <sup>th</sup> bullet point:	

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	Allocations	SA 8 St. Mary's University, Strawberry Hill	"It is acknowledged that this is a very constrained site, with the majority of the land not built on designated as Metropolitan Open Land."	<p>A further SA on the amended proposal and in light of the SOCG with GLA was carried out.</p> <p>Broadly speaking there should be no new buildings on designated, MOL land. This sensitive site is also adjacent to a Listed Chapel, and Strawberry Hill House and Gardens (Grade I Listed Buildings).</p> <p>There is very limited potential for development without encroaching into MOL or Historic Park &amp; Garden and works will need to be "justified" i.e. demonstrate very special circumstances if affecting MOL. Impacts will depend on the scale of and detailed design of any future scheme. New or rebuild presents opportunities to incorporate sustainable construction and low energy measures subject to the preservation of heritage assets.</p>
	Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Delete the last sentence of bullet point 4 as follows: <del>"There are also Listed Buildings, Buildings of Townscape Merit as well as sports playing fields."</del>	For clarity as the 4th bullet point seeks to address issues and constraints in relation to MOL, whereas the 5th bullet point is in relation to heritage assets, as agreed in Statement of
	Site	p.162	Insert at beginning of 5 <sup>th</sup> bullet point: <u>"There are also Listed</u>	



Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
	Allocations	SA 8 St. Mary's University, Strawberry Hill	<u>Buildings, Buildings of Townscape Merit as well as sports playing fields.</u>	Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).
	Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Amend bullet point 5 (in addition to change PE/SA8/4 above) to stress the significance of the heritage assets to read: "Any development proposal has <u>to take account of the highly significant heritage assets</u> and respect the special and unique location and setting of St Mary's University, <u>including the Grade I Listed Chapel</u> , the adjoining Grade I Listed Building (Strawberry Hill House) and the associated Historic Park and Garden (II*) as well as ..."	To further emphasise the sensitivity of the site as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
	Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Insert new bullet point within the supporting text (after the 5th bullet point) as follows: <u>"The existing playing fields and sports facilities should be retained and/or re-provided, and if necessary, replacement facilities will have to be provided on or off site."</u>	For clarification as agreed in Statement of Common Ground with Sport England (21 September 2017) (LBR-LP-024).
	Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Amend the 6 <sup>th</sup> bullet point: "The Council will work with the University on a Masterplan <u>and / or site development</u> brief (SPD) for the longer term upgrading of their sites, ..."	To provide greater clarity as agreed in Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).
	Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Amend the 7 <sup>th</sup> bullet point: "Detailed guidance on design and local character for any redevelopment proposal will also be set out within <del>the site brief (SPD) as well as in</del> the relevant Village Planning Guidance SPD, <u>and where relevant within the Masterplan / site development brief.</u> "	
	Site Allocations	p.162	Amend the 1st paragraph of Policy SA 8 to read:	The use of the word 'justified' is considered to be

Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
		SA 8  St. Mary's University, Strawberry Hill	Retention and upgrading of St Mary's University and its associated teaching, sport and student residential accommodation. Upgrade works to include refurbishment, adaptation, <u>intensification, extensions</u> and new build elements on site where <del>appropriate</del> <u>justified fully with regard to national policy and the policies of the development plan.</u>	a more suitable reference point for the need to demonstrate very special circumstances against the development plan and national policy in the event a planning application arose to be determined that affected Metropolitan Open Land and which was otherwise 'inappropriate development' by definition. The modification has been agreed by the Council and the GLA on behalf of the Mayor of London.
	Site Allocations	P.170 SA 14 Kneller Hall	Amend bullet point 6 as follows: "It is expected that the existing playing field will be retained and where possible upgraded, <u>such as with ancillary facilities, including changing provided to support the use of the playing fields</u> , provided that any existing ecological benefits and the openness and character of the Metropolitan Open Land is retained and, where possible enhanced."	For clarity and to address Sport England's comments in relation to ancillary facilities as agreed in Statement of Common Ground with Sport England (21 September 2017) (LBR-LP-024). This explanatory text does not necessitate altering the SA.
	Site Allocations	P.170 SA 14 Kneller Hall	Amend the last sentence of bullet point 7 to read: "Any development should <u>be sensitive to the significance of the historic building and</u> respond positively to the setting of the Listed Building."	To stress the significant heritage assets as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008). The amended text does not

Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
				necessitate further SA
	Site Allocations	P.170 SA 14 Kneller Hall	Change to the first sentence of main policy text: <del>"If the site is declared surplus to requirements, It has been announced that Kneller Hall will be released for disposal.</del> <u>Appropriate land uses include..."</u>	To clarify status of disposal, as agreed with the Defence Infrastructure Organisation (3 October 2017). The amended text does not necessitate further SA
	Site Allocations	p. 176 SA 17 St Michael's Convent	Amend the OSNI area on the map to that lying to the north of the lawn area and its delineating path.	To clarify. A further SA of SA 17 was carried out. Overall there are positive as well as some negative impacts but also uncertainties, which will depend on the details of any scheme. Although it would lead to a loss of social infrastructure, it should provide for some new homes and some community use. The proposal should contribute to the preservation and enhancement of the Conservation Area and the Listed Building by taking account of the sensitive local character. OOLTI should protect the gardens as green space and preserve the setting of the Listed Building. The amended boundary of the OSNI causes some protected acid grassland to be vulnerable and a carefully prepared management plan should help protect the site's numerous biodiversity and ecological assets.
	Site Allocations	p.182 SA 22 Pools	Add a third sentence to the end of Policy SA 22 thus: <u>"Any proposal would need to be fully justified having assessed</u>	To give greater recognition to the heritage assets and

Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
		on the Park	<u>the significance of the building and its setting, and having taken into account the wider heritage designations that apply to the site.</u>	MOL setting of the site, as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008). The amended text does not necessitate further SA as the potential impacts are identified under SA objective 7.
	Site Allocations	p.184 SA 23 Richmond Athletic Association Ground	Modify the 2 <sup>nd</sup> sentence of the policy so that Policy SA 23 reads: "The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional associated leisure facilities and other complementary uses could be incorporated provided they <u>have been fully justified as being necessary to support the continued sporting uses on the site, that they demonstrate meeting identified needs, do not detract from the main use of the site as a sports ground, and have been developed to take into account of the Metropolitan Open Land (MOL) and historic designations.</u> "	For greater clarity  The amended text does not necessitate further SA as potential impacts are identified under SA objective 7 and 8.
	Site Allocations	p.186 SA 24 Stag Brewery	In 7 <sup>th</sup> bullet point change text to read: "Incorporating a mix of uses, including social infrastructure and community as well as leisure, sport and health uses, and attractive frontages <del>would</del> <u>should</u> contribute to creating an inviting and vibrant new centre."	For greater clarity The amended text does not necessitate further SA.
	Site Allocations	p.186 SA 24  Stag Brewery	Proposed modification as new additional bullet point – new 10 <sup>th</sup> bullet point (after the one referring to Mortlake Conservation Area): <u>"The site is very close to an Air Quality Focus Area. Therefore strict mitigation measures will be required, both to mitigate any effect on current receptors and highways and on future receptors within the proposed development, particularly for</u>	To recognise that the air quality evidence has changed since the adoption of the site development brief in 2011. A further SA on the amended proposal was

Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
			<u>sensitive receptors, such as pupils at the secondary school."</u>	carried out to reflect the AQFA and the strengthened requirements on the Stag Brewery proposal site.
	Site Allocations	p.186 SA 24 Stag Brewery	Amend penultimate bullet point as follows: <del>"There may be an opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site. The adopted development brief (2011) identifies a number of transportation and highways issues.</del> The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where <del>possible</del> <u>necessary</u> improvements to <u>sustainable modes of travel, including public transport facilities, can be</u> <del>are</del> secured as part of any development proposal. <u>The opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site should be investigated as part of the comprehensive redevelopment."</u>	To recognise existing constraints and strengthen the need for improvements to sustainable travel modes where necessary.
	Site Allocations	p.186 SA 24 Stag Brewery	Amend first bullet point as follows: "The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities. <u>Any proposed development should have regard to the adopted brief."</u>	To clarify that any development scheme coming forward has to have regard to the adopted SPD.
	Site Allocations	p.186 SA 24 Stag Brewery	Insert after the original 10 <sup>th</sup> bullet point the following: <u>The playing fields in the south west corner of the site, which are designated Other Open Land of Townscape Importance (OOLTI), should be retained and/or reprovided and upgraded. In the event of reprovision and upgrading, where a</u>	To set out the context for 'reprovision'.

Change Ref. (Where given)	Policy Section or heading	Page/Para- graph	Proposed change	Sustainability Appraisal
			<u>comprehensive approach to redevelopment can be taken in line with policy LP 14, it may be acceptable to re-distribute designated OOLTI within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness. In addition, re-provision and upgrading of the playing fields within the site for sport uses has to be carried out in line with policy LP 31, the NPPF and Sport England Policy.</u>	
	Site Allocations	p.186 SA 24 Stag Brewery	Amend the original 9 <sup>th</sup> bullet point as follows: "The site is <u>within an Archaeological Priority Area</u> and partially within the Mortlake Conservation Area..."	For clarification.
	Site Allocations	p.191 SA 28 Barnes Hospital	Modify the 2 <sup>nd</sup> sentence of policy SA 28 to read: "Any redevelopment proposal for this site will be required to prioritise the provision of a new <u>Special Education Needs 2-</u> <del>form entry primary</del> school."	To reflect a change in educational need A further SA was carried out reflecting the improved impacts on travel due to the change in type of educational establishment.
	Site Allocations	p.191 SA28 Barnes Hospital	In 3 <sup>rd</sup> bullet point change text to read: "There is a clear need for a new <u>Special Education Needs 2-</u> <del>form entry primary</del> school in this area as set out in the <u>updated</u> Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to prioritise the provision of the educational use."	

## **2. Conclusion**

2.1 Overall, the assessment of the proposed main modifications found that there would be no significant negative effects against the sustainability objectives in the SA, with many neutral or positive effects being identified. The modifications therefore do not significantly alter the overall findings of the SA of the Publication Plan [Report](#) (January 2017) in terms of delivering positive sustainability outcomes, with a number amendments to give greater clarity and improvements provided.

Sustainability Appraisal Framework for the Local Plan

SA objectives for the London Borough of Richmond upon Thames Local Plan			
	Env	Econ	Soc
1) To prevent and reduce the amount of waste that is produced and increase the proportion that is reused, recycled and composted, recovered (including energy recovery) before lastly disposal.	✓		
2) To reduce pollution (such as air, noise, light, water and soil) from any source and ensure air and water quality improves and safeguard soil quality and quantity.	✓		
3) To reduce the need for travel, encourage alternatives to the car, make best use of existing transport infrastructure and improve public transport integration.	✓		✓
4) To mitigate climate change by reducing greenhouse gas emissions and promoting sustainable energy use through maximising energy efficiency, use of zero- and low carbon technologies and renewable energy, and provide satisfactory water and sewerage infrastructure.	✓		✓
5) To ensure resilience to the effects of climate change through effective adaptation, in particular avoiding or reducing flood risk from all sources and conserving water.	✓	✓	✓
6) To conserve and enhance biodiversity, avoid damage and irreversible losses to designated sites and protected species, adding to the abundance of non-designated biodiversity features and habitats (such as trees, gardens, green roofs and other features).	✓		
7) To promote high quality places, spaces and buildings and conserve and enhance the borough's landscape and townscape character and its heritage assets and their settings..	✓	✓	✓
8) To protect and enhance the quality and range of parks and open spaces and plan positively for the creation, protection and enhancement of the green infrastructure network.	✓		✓
9) To make best and efficient use of previously developed land and existing buildings, implement sustainable design and construction practices and remediate and reuse contaminated land.	✓	✓	✓
10) To provide new housing opportunities and sufficient affordable housing that meets local needs.		✓	✓



11) To facilitate and improve the health and well-being of the population, reduce health inequalities and deliver safer and more secure communities.			✓
12) To promote the independence of people and communities by improving the quality, range and accessibility of services and facilities, such as health, transport, education, training, employment, environment, leisure, sport and recreation opportunities.		✓	✓
13) To increase the vitality and viability of existing town centres, local centres and parades.		✓	✓
14) To promote and strengthen a buoyant, diverse and resilient local economy and facilitate inward investment that will secure sustainable economic growth.		✓	✓
15) To increase the amount and quality of commercial development opportunities to meet the needs of the local and sub-regional economy.		✓	✓

## Appendix 1 – Sustainability Appraisal of Modifications

### Modified Policy followed by original version

#### Policy LP3 Designated Heritage Assets (with modifications)

A. The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, Listed Buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced by the following means:

1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset.
2. Resist the demolition in whole, or in part, of Listed Buildings. Consent for demolition of Grade II Listed Buildings will only be granted in exceptional circumstances and for Grade II\* and Grade I Listed Buildings in wholly exceptional circumstances following a thorough assessment of their the justification for the proposal and the significance of the asset.
3. Resist the change of use of Listed Buildings where their significance would be harmed ~~this would materially harm their character and distinctiveness~~, particularly where the current use contributes to the character of the surrounding area and to its sense of place.
4. Require the retention and preservation of the original structure, layout, architectural features, materials as well as later features of interest within Listed Buildings, and resist the removal or modification of features that are both internally and externally of architectural importance or that contribute to the significance of the asset.
5. Demolitions (in whole or in part), alterations, extensions and any other modifications to Listed Buildings should be based on an accurate understanding of the significance of the heritage asset.
6. Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within Listed Buildings, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development.
7. Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists.
8. Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.

**9. Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.**

B. Resist substantial demolition in Conservation Areas and any changes that could harm heritage assets, unless it can be demonstrated that:

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

C. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.

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

E. Outline planning applications will not be accepted in Conservation Areas. The Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans, will be used as a basis for assessing development proposals within, or where it would affect the setting of, Conservation Areas, together with other policy guidance, such as Village Planning Guidance SPDs.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel							Neutral
4. Water							Neutral
5. Energy							Neutral
6. Biodiversity							Neutral

7. Landscape & townscape			++	++	++	++	Policy will have a very positive impact on townscape. The significance (including the setting) of the asset is to be assessed before development is allowed
8. Green spaces							Neutral
9. Best use of land & sustainable construction							Neutral
10. Housing							Neutral
11. Safer and cohesive communities							Neutral
12. Health & well-being							Neutral
13. Town centres							Neutral
14. Economy							Neutral
15. Commercial development opportunities							Neutral
<p><b>Summary of assessment: <i>(likely sustainability impact of the option)</i></b>  Policy will protect the borough's Listed Buildings, some war memorials, four scheduled Ancient Monuments as well as 14 Historic Park and Gardens that are on Historic England's Register, Conservation Areas and the exceptional historic environment that make a significant contribution to the special character of the borough.</p>							
<p><b>Comments on assessment: <i>(additional comments on individual objectives and cumulative effects)</i></b>  Policy is strongly protective of the character and settings of the borough's historic assets and monuments.</p>							
<p><b>Possible mitigation: <i>(measures to mitigate likely negative effects and enhance positive effects )</i></b>  Applicants will be expected to demonstrate how a development proposal complies with the relevant Conservation Area appraisals, plans and studies, as well as the Village Planning Guidance SPDs, including any other relevant SPDs/SPGs adopted by the Council.</p>							

Policy LP3 Designated Heritage Assets <b>original version</b>							
A policy to conserve, protect, and where possible take opportunities to make a positive contribution to the historic environment of the borough.							
SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel							Neutral
4. Water							Neutral
5. Energy							Neutral
6. Biodiversity							Neutral
7. Landscape & townscape			++	++	++	++	Policy will have a very positive impact on townscape
8. Green spaces							Neutral
9. Best use of land & sustainable construction							Neutral
10. Housing							Neutral
11. Safer and cohesive communities							Neutral
12. Health & well-being							Neutral
13. Borough centres			++	++	++	++	Policy will have a positive impact on town centres
14. Economy				+	+	+	Policy may well support the visitor economy as visitors enjoy the heritage assets of the borough
15. Commercial development							Neutral

opportunities							
<p><b>Summary of assessment: (likely sustainability impact of the option)</b>  Policy will protect the borough's Listed Buildings, some war memorials, four scheduled Ancient Monuments as well as 14 Historic Park and Gardens that are on Historic England's Register, Conservation Areas and the exceptional historic environment that make a significant contribution to the special character of the borough.</p>							
<p><b>Comments on assessment: (additional comments on individual objectives and cumulative effects)</b>  The policy is strongly protective of the heritage assets and character of the borough.</p>							
<p><b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b></p> <p>Applicants will be expected to demonstrate how a development proposal complies with the relevant Conservation Area appraisals, plans and studies, as well as the Village Planning Guidance SPDs, including any other relevant SPDs/SPGs adopted by the Council.</p>							

<p><b>Policy LP35 Housing Mix and Standards (incorporating modifications)</b></p> <p>A. Development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the <u>site-specifics of the</u> location.</p> <p>B. All new housing development, including conversions, are required to comply with the Nationally Described Space Standard.</p> <p>C. All new housing development, including conversions, <del>are required to comply with the Council's</del> <u>should provide adequate</u> external space <del>standards.</del> <u>For houses a minimum total private space of 70sqm for 3 or more beds and 40sqm for 2 beds should be provided. To provide adequate private amenity space for flats, a minimum of 5sqm of private outdoor space for 1-2 person dwellings should be provided and an extra 1sqm should be provided for each additional occupant.</u> Purpose built, well designed and positioned balconies or terraces are encouraged where new residential units are on upper floors, if they comply with policy LP8 Amenity and Living Conditions. <u>Regard should be had to the Council's Residential Development Standards SPD as appropriate.</u></p> <p>D. Amenity space for all new dwellings, including conversions, should be:</p> <ol style="list-style-type: none"> <li>private, usable, functional and safe;</li> <li>easily accessible from living areas;</li> <li>orientated to take account of need for sunlight and shading;</li> <li>of a sufficient size to meet the needs of the likely number of occupiers; and</li> <li>accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space.</li> </ol> <p>E. 90% of all new build housing is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% of all new build</p>
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housing is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings'.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel							Neutral
4. Water							Neutral
5. Energy							Neutral
6. Biodiversity					-	-	Fewer opportunities for tree planting and communal green space.
7. Landscape & townscape							Neutral
8. Green spaces					-	-	Less opportunity for green infrastructure and open spaces
9. Best use of land & sustainable construction					+	+	Should lead to a more efficient use of previously developed land
10. Housing				+	+	+	Offers the potential to develop sites at higher densities.
11. Safer and cohesive communities						-	May harm community cohesion if not designed with care.
12. Health & well-being					-	-	Less space and privacy between dwellings, though this can be mitigated through careful design.
13. Town centres							Neutral
14. Economy							Neutral

15. Commercial development opportunities							Neutral
<p>Summary of assessment: <i>(likely sustainability impact of the option)</i>  This policy is very strong on housing provision and the efficient use of the land, but may reduce the opportunities for provision of private amenity space, green infrastructure and habitat creation.</p>							
<p>Possible mitigation: <i>(measures to mitigate likely negative effects and enhance positive effects )</i>  Ensure that developments take account of residential design SPDs, Village Plans, Conservation Area statements, etc.</p>							

**Policy LP35** Housing Mix and Standards **original version**

Policy sets out guidance on housing mix and Standards, which should reflect current national and regional guidance.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel							Neutral
4. Water							Neutral
5. Energy							Neutral
6. Biodiversity					+		Tree planting opportunities & communal and amenity green space
7. Landscape & townscape							Neutral



8. Green spaces							Neutral
9. Best use of land & sustainable construction							Neutral
10. Housing						-	Likely that there will be less opportunity for smaller and higher density units.
11. Safer and cohesive communities				+	+	+	It is recognised that adequate space in the home has an effect on community cohesion.
12. Health & well-being			+	+	+	+	It is recognised that adequate space in that home has an effect on health, especially in terms of light ventilation and sense of space
13. Town centres							Neutral
14. Economy							Neutral
15. Commercial development opportunities							Neutral
<p><b>Summary of assessment: (likely sustainability impact of the option)</b>  Policy will protect the borough's Listed Buildings, some war memorials, four scheduled Ancient Monuments as well as 14 Historic Park and Gardens that are on Historic England's Register, Conservation Areas and the exceptional historic environment that make a significant contribution to the special character of the borough.</p>							
<p><b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b>   Applicants will be expected to demonstrate how a development proposal complies with the relevant Conservation Area appraisals, plans and studies, as well as the Village Planning Guidance SPDs, including any other relevant SPDs/SPGs adopted by the Council.</p>							

**Policy LP8 Amenity and Living Conditions (incorporating modifications)**

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

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

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

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution							This policy should ensure new development does not cause air, noise or light pollution
3. Travel							Neutral
4. Water							Neutral
5. Energy							Neutral
6. Biodiversity							Neutral

7. Landscape & townscape			+	++	++	++	This policy should ensure that new development take account of neighbouring properties, which would be beneficial for the character of the area and townscape.
8. Green spaces							Neutral
9. Best use of land & sustainable construction							Neutral
10. Housing							Neutral
11. Safer and cohesive communities			+	+	++	++	By ensuring new development takes account of the neighbouring properties should provide benefits for the community
12. Health & well-being			+	+	++	++	This policy should ensure that new development take account of neighbouring properties, which would be beneficial for health and well-being
13. Borough centres							Neutral
14. Economy							Neutral
15. Commercial development opportunities							Neutral
<p><b>Summary of assessment: (likely sustainability impact of the option)</b>  This policy has many benefits for amenity and living conditions of neighbours: health, well-being, cohesive communities and neighbourliness. It also may support the established pattern of development</p>							
<p><b>Comments on assessment: (additional comments on individual objectives and cumulative effects)</b>  This policy has many social and environmental benefits.</p>							
<p><b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b>  New buildings and extensions need to take careful account of the living conditions of neighbours, with particular regard to natural light, light pollution, privacy, noise and disturbance. The Council's SPDs, including on Householder Extensions and External Alterations, Residential Development Standards and on Small and Medium Housing Sites, provide further guidance and illustrations on how to assess sunlight/daylight, overshadowing, visual intrusion, privacy and space between buildings. An assessment will be made on a site by site basis and a supporting planning statement should set out justification for reducing distances between habitable rooms, if necessary.</p>							

**Policy LP8 Amenity and Living Conditions original version**

A policy that requires new buildings and extensions to take careful account of the living conditions of neighbours, with particular regard to natural light, light pollution, privacy, noise and disturbance.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution			+	++	++	++	This policy should ensure new development does not cause air, noise or light pollution
3. Travel							Neutral
4. Water							Neutral
5. Energy							Neutral
6. Biodiversity							Neutral
7. Landscape & townscape			+	++	++	++	This policy should ensure that new development take account of neighbouring properties, which would be beneficial for the townscape.
8. Green spaces							Neutral
9. Best use of land & sustainable construction							Neutral
10. Housing						-	Likely that there will be less opportunity for smaller and higher density units.
11. Safer and cohesive communities			++	++	++	++	This policy should ensure that new development take account of neighbouring properties, which would be

							beneficial for cohesive communities
12. Health & well-being			+	++	++	++	This policy should ensure that new development take account of neighbouring properties, which should be beneficial for health and well-being.
13. Town centres							Neutral
14. Economy							Neutral
15. Commercial development opportunities							Neutral
<b>Summary of assessment: (likely sustainability impact of the option)</b> This policy has many benefits for health, well-being, cohesive communities and neighbourliness							
<b>Comments on assessment: (additional comments on individual objectives and cumulative effects)</b> The policy has a series of benefits both environmental and social.							
<b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b> New buildings and extensions need to take careful account of the living conditions of neighbours, with particular regard to natural light, light pollution, privacy, noise and disturbance. The Council's SPDs, including on Householder Extensions and External Alterations, Residential Development Standards and on Small and Medium Housing Sites, provide further guidance and illustrations on how to assess sunlight/daylight, overshadowing, visual intrusion, privacy and space between buildings.							

**Policy LP10 Local Environmental Impacts, Pollution and Land Contamination (with Modifications)**

A. The Council will seek to ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land. These potential impacts can include, but are not limited to, air pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle as well as land contamination. Developers should follow any guidance provided by the Council on local environmental impacts and pollution as well as on noise generating and noise sensitive development. Where necessary, the Council will set planning conditions to reduce local environmental impacts on adjacent land uses to acceptable levels.

*Air Quality*

B. The Council promotes good air quality design and new technologies. Developers should **commit to secure at least** 'Emissions Neutral' development **where practicable**. To consider the impact of introducing new developments in areas already subject to poor air quality, the following will be required: 1. an air quality impact assessment, including where necessary, modelled data; 2. mitigation measures to reduce the development's impact upon air quality, including the type of equipment installed, thermal insulation and ducting abatement technology; 3. measures to protect the occupiers of new developments from existing sources; 4. strict mitigation for developments to be used by sensitive receptors such as schools, hospitals and care homes in

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

*Noise and Vibration*

C. The Council encourages good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected. The following will be required, where necessary: 1. a noise assessment of any new plant and equipment and its impact upon both receptors and the general background noise levels; 2. mitigation measures where noise needs to be controlled and managed; 3. time limits and restrictions for activities where noise cannot be sufficiently mitigated; 4. promotion of good acoustic design and use of new technologies; 5. measures to protect the occupiers of new developments from existing sources.

*Light Pollution*

D. The Council will seek to ensure that artificial lighting in new developments does not lead to unacceptable impacts by requiring the following, where necessary: 1. an assessment of any new lighting and its impact upon any receptors; 2. mitigation measures, including the type and positioning of light sources; 3. promotion of good lighting design and use of new technologies.

*Odours and Fume Control*

E. The Council will seek to ensure that any potential impacts relating to odour and fumes from commercial activities are adequately mitigated by requiring the following: 1. an impact assessment where necessary; 2. the type and nature of filtration to be used; 3. the height and position of any chimney or outlet; 4. promotion and use of new abatement technologies;

*Land Contamination*

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

*Construction and demolition*

G. The Council will seek to manage and limit environmental disturbances during construction and demolition as well as during excavations and construction of basements and subterranean developments. To deliver this the Council requires the submission of Construction Management Statements (CMS) for the following types of developments: 1. all major developments; 2. any basement and subterranean developments; 3. developments of sites in confined locations or near sensitive receptors; or 4. if substantial demolition/excavation works are proposed. Where applicable and considered necessary, the Council will may seek a bespoke charge specific to the proposal to cover the cost of monitoring the CMS; a discount may be applied if the applicant/developer uses the Council's Building Control services.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light,		+	++	++	++	++	The whole borough is an AQMA. Strict mitigation will be

water and soil pollution							required for any new development in or adjacent to Air Quality Focus Areas, which are designated by the Greater London Authority
3. Travel							Neutral
4. Water							Neutral
5. Energy							Neutral
6. Biodiversity							Neutral
7. Landscape & townscape							Neutral
8. Green spaces							Neutral
9. Best use of land & sustainable construction			+	++	++	++	
10. Housing							Neutral
11. Safer and cohesive communities							
12. Health & well-being			+	++	++	++	
13. Town centres							Neutral
14. Economy							Neutral
15. Commercial development opportunities							Neutral

Summary Comments on assessment: *(additional comments on individual objectives and cumulative effects)*

Strict mitigation will be required for any developments proposed within or adjacent to 'Air Quality Focus Areas'. An 'Air Quality Focus Area' is a location that has been identified as having high levels of pollution (i.e. exceeding the EU annual mean limit value for nitrogen dioxide) and human exposure. Air Quality Focus Areas are designated by the Greater London Authority.

Possible mitigation: *(measures to mitigate likely negative effects and enhance positive effects )*

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

**Policy LP10 Local Environmental Impacts, Pollution and Land Contamination (original )**

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

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution			++	++	++	++	Policy attempts to reduce air pollution, noise and vibration, light pollution, odours and fumes as well as land contamination impacts of all developments on users and occupiers of a site and its surroundings.
3. Travel							Neutral
4. Water							Neutral
5. Energy							Neutral
6. Biodiversity							Neutral
7. Landscape & townscape							Neutral
8. Green spaces							Neutral
9. Best use of land & sustainable construction			+	+	++	++	The policy will have a positive impact on making the best use of land



10. Housing							Neutral
11. Safer and cohesive communities							Neutral
12. Health & well-being			+	++	++	++	Policy attempts to reduce health, safety and amenity impacts of development on users and occupiers of a site and its surroundings
13. Town centres							Neutral
14. Economy							Neutral
15. Commercial development opportunities							Neutral
<p>Summary of assessment: <i>(likely sustainability impact of the option)</i></p> <p>Highly sustainable option in the area of pollution and health</p>							
<p>Comments on assessment: <i>(additional comments on individual objectives and cumulative effects)</i></p> <p>A remediation strategy that sets out how any identified risks from the development are going to be addressed is required</p>							
<p>Possible mitigation: <i>(measures to mitigate likely negative effects and enhance positive effects )</i></p> <p>This policy is considered to afford occupiers and neighbouring properties protection from noise, nuisance, disturbance, highway obstruction, vibration, dust and other pollutants.</p>							

**Policy LP13 Green Belt, Metropolitan Open Land and Local Green Space (modified )**

**Green Belt and Metropolitan Open Land**

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

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

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

~~1. Does not harm the character and openness of the Green Belt or Metropolitan Open Land; and~~

~~2. Is linked to the functional use of the Green Belt or Metropolitan Open Land, or supports outdoor open space uses; or~~

~~3. Is for essential utility infrastructure and facilities for which it needs to be demonstrated that no alternative locations are available and that they do not have any adverse impacts on the character and openness of the Green Belt or Metropolitan Open Land.~~

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

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

#### Local Green Space

D. Local Green Space, which has been demonstrated to be special to a local community and which holds a particular local significance, will be protected from inappropriate development that could cause harm to its qualities.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution			+	+	+	+	As only small-scale and minor development is allowed pollution and contamination impacts are likely to be low
3. Travel							Neutral
4. Energy							Neutral
5. Water			+	+	+	+	Rivers and water bodies within the borough are included within MOL.
6. Biodiversity			+	+	+	+	Safeguarded open land will be beneficial to wildlife.

7. Landscape & townscape			+	+	+	+	The borough's landscape assets will be preserved
8. Green spaces				+	+	+	The protection and enhancement of these spaces will also improve the green infrastructure network and range of open spaces.
9. Best use of land & sustainable construction							Neutral
10. Housing				-	-	-	Will reduce the available opportunities for housing development
11. Safer and cohesive communities					+	+	Positive impacts in the longer-term and cumulatively if sites are protected and retained in open uses. Local Green Space is by definition special to the local community it serves.
12. Health & well-being			+	+	++	++	A positive effect for health and well-being, as it allows sports, leisure and recreation. It allows appropriate open uses for community users such as allotments and contributes to the green infrastructure network, thereby creating opportunities for recreation and contact with the natural environment.
13. Town centres							Neutral
14. Economy							Neutral
15. Commercial development opportunities				-	-	-	Will limit the scope for commercial development opportunities.
<p><b>Summary of assessment: <i>(likely sustainability impact of the option)</i></b>  A highly sustainable policy in terms of the environment and social well-being.</p>							
<p><b>Comments on assessment: <i>(additional comments on individual objectives and cumulative effects)</i></b>  Green Belt, MOL and Local Green Space are protected open land. The higher level policies go into detail and stipulate what might be appropriate uses, and require justification of "very special circumstances" that would allow exceptional small scale development, subject to strict criteria. Local Green Spaces designation offers additional protection to space special to a local community.</p>							
<p><b>Possible mitigation: <i>(measures to mitigate likely negative effects and enhance positive effects )</i></b>  The likely negative effects of the policy are that it restricts opportunities for housing and commercial development. Green Belt, MOL and Local Green Space are protected by higher level national and regional policy, which set out the exceptional cases where inappropriate development may be permitted.</p>							

**Policy LP13 Green Belt, Metropolitan Open Land and Local Green Space (original)**

A policy that sets out objectives to protect the designated areas, appropriate uses, exceptional cases and encouragement to improve or enhance the character and openness of the designations.

The Proposals Map changes document sets out a new Local Green Space designation at Udney Park Playing Fields and a MOL boundary change at Harrodian School.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution			+	+	+	+	Only minor development is allowed so soil quality and quantity will be protected
3. Travel							Neutral
4. Energy							Neutral
5. Water			+	+	+	+	Rivers and bodies of water are included in MOL
6. Biodiversity			+	+	+	+	Policy protects open land and biodiversity is an appropriate use.
7. Landscape & townscape			+	+	+	+	Policy protects the landscape, including the Udney Park Playing Fields.
8. Green spaces				+	+	+	Policy protects the landscape and open spaces, some of which will be part of the green infrastructure network, including the Udney Park Playing Fields. It is noted that the MOL boundary change at Harrodian School in Barnes only seeks to remove the cluster of buildings in the south-western corner of the site, which is already predominately built on and no longer considered as open space. The remainder of the site continues to be protected.
9. Best use of land & sustainable construction							Neutral. This also applies to the MOL boundary change at Harrodian School in Barnes.
10. Housing				-	-	-	Negative effects for housing as it restricts housing opportunities, including at the Udney Park Playing Fields site.
11. Safer and cohesive communities					+	+	Neutral

12. Health & well-being			+	+	++	++	A positive effect for health and well-being, as it allows sports, leisure and recreation. Positive effects as a result of the new Local Green Space designation at Udney Park Playing Fields.
13. Borough centres							Neutral
14. Economy							Neutral
15. Commercial development opportunities				-	-	-	A negative effect for commercial development as it restricts opportunities.
<b>Summary of assessment: <i>(likely sustainability impact of the option)</i></b> This policy has overall a positive impact, particularly in terms of environmental and social perspectives.							
<b>Comments on assessment: <i>(additional comments on individual objectives and cumulative effects)</i></b> Green Belt, MOL and Local Green Space are protected open land. The policy goes into detail and stipulates what are appropriate uses. It requires justification of "very special circumstances" but would allow exceptional small scale development, subject to strict criteria. Local Green Spaces designation offers additional protection to space special to a local community. Changes to the MOL boundary at Harrodian School, Barnes should help to preserve the openness of the remaining open and undeveloped MOL.							
<b>Possible mitigation: <i>(measures to mitigate likely negative effects and enhance positive effects)</i></b> The likely negative effects of the policy are that it restricts opportunities for housing and commercial development. However, the Green Belt, MOL and Local Green Space continue to be protected by national and regional policy. This policy sets out that there may be exceptional cases where appropriate development is acceptable.							

**Policy LP18 River Corridors (modified policy)**

**River corridors**

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

**Thames Policy Area**

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

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

**Public Access**

- C. All development proposals alongside or adjacent to the borough's river corridors should:
- Retain existing public access to the riverside and alongside the river; and
  - Enhance existing public access to the riverside where improvements are feasible; or
  - Provide new public access to the riverside **and the foreshore** where possible, **and maintain existing points of access to the foreshore subject to health and safety considerations**. There is an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside **and foreshore**.
  - Provide riparian life-saving equipment where required and necessary.**

**River Thames public riverside walk**

D. All development proposals adjoining the River Thames are required to provide a public riverside walk, including for pedestrians and cyclists, which will contribute to the overarching aim of providing a continuous publicly accessible riverside walk. For major developments, applicants will be expected to work with adjoining landowners in case ownership issues would prevent public access.

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

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

This will be achieved by:

- resisting redevelopment of existing river-dependent or river-related industrial and business uses to non-river related employment uses or residential uses unless it can be demonstrated that no other river-dependent or river-related use is feasible or viable;
- ensuring development on sites along the river is functionally related to the river and includes river-dependent or river-related uses where possible, including gardens which are designed to embrace and enhance the river, and be sensitive to its ecology;
- requiring an assessment of the effect of the proposed development on the operation of existing river-dependent uses or riverside gardens on the site and their associated facilities on- and off-site;  
or requiring an assessment of the potential of the site for river-dependent uses and facilities if there are none existing;
- ensuring that any proposed residential uses, where appropriate, along the river are compatible with the operation of the established river-related and river-dependent uses;
- requiring setting back development from river banks and existing flood defences along the River Thames.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		

1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel							Neutral
4. Energy							Neutral
5. Water				+	+	+	Setting back built development from the borough's rivers, riverbanks and existing flood defences will allow for the maintenance and future upgrading of the flood defences.
6. Biodiversity			+	+	+	+	The rivers and their corridors provide valuable habitats for wildlife
7. Landscape & townscape			+	+	+	+	The borough's rivers contribute to the special and distinctive character of this borough.
8. Green spaces				+	+	+	The rivers are important components of the wider Green Infrastructure network
9. Best use of land & sustainable construction					+	+	Best use of land as policy ensures river-related businesses are in the right location and cannot be displaced by other uses
10. Housing				-	-	-	Restricts housing redevelopment opportunities on existing built up land by the river. (All the borough's rivers are in designated MOL & are protected for openness)
11. Safer and cohesive communities			+	+	+	++	Potential to maintain and improve flood defences by setting back development. Addresses concerns over danger on the foreshore and adds life-saving equipment, which benefits public safety
12. Health & well-being			+	+	+	++	A positive effect for health and well-being, as it seeks access to the riverbank for leisure and recreational opportunities
13. Borough centres							Neutral
14. Economy			+	+	+	+	Seeks to protect river- related industries and river-dependent uses in the river corridors and helps maintain a diverse economy
15. Commercial development			+	+	+	+	River-related commercial and recreational opportunities are

opportunities							encouraged
<p>Summary of assessment: <i>(likely sustainability impact of the option)</i>  The policy has a series of benefits; environmental, economic and social.</p>							
<p>Comments on assessment: <i>(additional comments on individual objectives and cumulative effects)</i></p> <p>The policy goes into detail and stipulates what are appropriate uses at the riverside. It would allow development of river-dependent structures such as moorings and jetties and protects river-related uses that make an irreplaceable contribution to the character of the individual reaches. It also seeks safer access to the foreshore and the installation of life-saving equipment where necessary.</p>							
<p>Possible mitigation: <i>(measures to mitigate likely negative effects and enhance positive effects )</i>  The likely negative effects of the policy are that it restricts opportunities for housing at the waterside.</p>							

<p><b>Policy LP18 River Corridors Original</b>  A policy that protects the natural, historic and built environment of river corridors and watercourses. Enhance and improve the river environment, provide public access to the river corridors and foreshore and maintain river-related and river dependent uses.</p>							
SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel							Neutral
4. Energy							Neutral
5. Water				+	+	+	Setting back built development from the borough's rivers, riverbanks and existing flood defences will allow for the maintenance and future upgrading of the flood defences.
6. Biodiversity			+	+	+	+	The rivers and their corridors provide valuable habitats for



							wildlife
7. Landscape & townscape			+	+	+	+	The borough's rivers contribute to the special and distinctive character of this borough.
8. Green spaces				+	+	+	The rivers are important components of the wider Green Infrastructure network
9. Best use of land & sustainable construction					+	+	Best use of land as policy ensures river-related businesses are in the right location and cannot be displaced by other uses
10. Housing				-	-	-	Restricts housing redevelopment opportunities on existing built up land by the river. (All the borough's rivers are in designated MOL & are protected for openness)
11. Safer and cohesive communities					+	+	Potential to maintain and improve flood defences by setting back development.
12. Health & well-being			+	+	+	++	A positive effect for health and well-being, as it seeks access to the riverbank for leisure and recreational opportunities
13. Borough centres							Neutral
14. Economy			+	+	+	+	Seeks to protect river- related industries and river-dependent uses in the river corridors and helps maintain a diverse economy
15. Commercial development opportunities			+	+	+	+	River-related commercial and recreational opportunities are Encouraged
<b>Summary of assessment: (likely sustainability impact of the option)</b>							
This policy has overall a positive impact, in particular in terms of environmental and social perspectives.							
<b>Conclusion: (additional comments on individual objectives and cumulative effects)</b>							
The policy goes into detail and stipulates what are appropriate uses at the riverside. It would allow development of river-dependent structures such as moorings and jetties and protects river-related uses that make an irreplaceable contribution to the character of the individual reaches.							
<b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b>							
The likely negative effects of the policy are that it restricts opportunities for housing at the waterside. New buildings and extensions need to take careful account of the living conditions of neighbours, with particular regard to natural light, light pollution, privacy, noise and disturbance. The Council's SPDs, including on Householder Extensions and External Alterations, Residential Development Standards and on Small and Medium Housing Sites, provide further guidance and illustrations on how to assess sunlight/daylight, overshadowing, visual intrusion, privacy and space between buildings.							

**Policy LP21 Flood Risk and Sustainable Drainage (Incorporating Modifications)**

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

In **Flood Zones 2 and 3** areas at risk of flooding, all proposals on sites of 10 dwellings or more or 1000sqm of non-residential development or more, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted.

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

	Land uses and developments- restrictions	Sequential Test	Exception Test	Flood Risk Assessment
Zone 3b	<p>The functional floodplain as identified in the Council's Strategic Flood Risk Assessment will be protected by not permitting any form of development on undeveloped sites unless it:</p> <ul style="list-style-type: none"> <li>• is for Water Compatible development;</li> <li>• is for essential utility infrastructure which has to be located in a flood risk area and no alternative locations are available and it can be demonstrated that the development would be safe, without increasing flood risk elsewhere and where possible would reduce flood risk overall.</li> </ul> <p>Redevelopment of existing developed sites will only be supported if there is no intensification of the land use and a net flood risk reduction is proposed; any restoration of the functional floodplain will be supported.</p> <p>Proposals for the change of use or conversion to a use with a higher vulnerability</p>	Required for essential utility infrastructure	Required for essential utility infrastructure	Required for all development proposals

Zone 3a	Land uses are restricted to Water Compatible, Less Vulnerable and More Vulnerable development. Highly Vulnerable developments will not be permitted. Self-contained residential basements and bedrooms at basement level will not be permitted.	Required for all developments unless exceptions outlined in the justification apply	Required for more vulnerable development	Required for all development proposals
Zone 2	No land use restrictions Self-contained residential basements and bedrooms at basement level will not be permitted.	Required for all developments unless exceptions outlined in the justification apply	Required for highly vulnerable development	Required for all development proposals unless for change of use from water compatible to less vulnerable
Zone 1	No land use restrictions	Not applicable	Not applicable	A Drainage Statement is required for sites all major developments. Required for all other development proposals where there is evidence of a risk from other sources of flooding, including surface water, ground water and sewer flooding.

### Basements and subterranean developments

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

<b>Flood Zone 3b (Functional Floodplain)</b>	Basements, basement extensions, conversions of basements to a higher vulnerability classification or self-contained units will not be permitted.
<b>Flood Zone 3a (Tidal / Fluvial)</b>	<p><b>In areas of Extreme, Significant and Moderate Breach Hazard</b> (as set out in the Council's SFRA):</p> <ul style="list-style-type: none"> <li>• <b>New basements:</b> <ul style="list-style-type: none"> <li>○ restricted to Less Vulnerable / Water Compatible use only.</li> <li>○ 'More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed.</li> </ul> </li> <li>• <b>Existing basements:</b> <ul style="list-style-type: none"> <li>○ No basement extensions, conversions or additions for 'Highly Vulnerable' uses.</li> <li>○ 'More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed.</li> </ul> </li> </ul> <p><b>In areas of Low or No Breach Hazard</b> (as set out in the Council's SFRA):</p> <ul style="list-style-type: none"> <li>• <b>New basements:</b> if the Exception Test (where applicable) is passed, basements may be permitted for residential use where they are not self-contained or used for bedrooms.</li> <li>• <b>Existing basements:</b> basement extensions, conversions or additions may be permitted for existing developments where they are not self-contained or used for bedrooms.</li> </ul>

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

### Sustainable drainage

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

1. A reduction in surface water discharge to greenfield run-off rates wherever feasible.
2. Where greenfield run-off rates are not feasible, this will need to be demonstrated by the applicant, and in such instances, the minimum requirement is to achieve at least a 50% attenuation of the site's surface water runoff at peak times based on the levels existing prior to the development.

### Flood defences

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

1. Retain the effectiveness, stability and integrity of flood defences, river banks and other formal and informal flood defence infrastructure.
2. Ensure the proposal does not prevent essential maintenance and upgrading to be carried out in the future.
3. Set back developments from river banks and existing flood defence infrastructure where possible (16 metres for the tidal Thames and 8 metres for other rivers).
4. Take into account the requirements of the Thames Estuary 2100 Plan and the River Thames Scheme, and demonstrate how the current and future requirements for flood defences have been incorporated into the development.
5. The removal of formal or informal flood defences is not acceptable unless this is part of an agreed flood risk management strategy by the Environment Agency.

SA objectives	Geographic scale	Assessment / Length of effect	Commentary/explanation, uncertainties, proposed mitigation
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	Local	Trans-boundary	Short term	Medium term	Long term	Cumulative	
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel							Neutral
4. Energy							Neutral
5. Water	+		+	+	+	+	Promotes SUDS which should have positive impacts
6. Biodiversity							Neutral
7. Landscape & townscape							Neutral
8. Green spaces		+		+	+	+	Policy encourages creating spaces that will become part of the Green Infrastructure network
9. Best use of land & sustainable construction							Neutral
10. Housing				-/?	-	-	May reduce opportunities for new housing
11. Safer and cohesive communities	+		+	+	++	++	Sequential test should help reduce risk to humans from flooding and inundation. Taking account of latest climate change allowances should help to minimise vulnerability and provide resilience to flooding.
12. Health & well-being	+		+	+	++	++	A positive effect for health and well-being, as it should reduce flooding now and in the future.
13. Borough centres							Neutral
14. Economy		+	+	+	+	+	Flood defences and Sequential test should help reduce risk to humans and property from flooding and inundation
15. Commercial development opportunities							Neutral
<p>Summary of assessment: <i>(likely sustainability impact of the option)</i>  This policy has overall a positive impact in terms of environmental and social perspectives.</p>							

**Conclusion: (additional comments on individual objectives and cumulative effects)**

New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change, such as increased risk of flooding. The policy sets out the Sequential Test to guide development to less risky locations and the Exception Test to allow redevelopment of existing developed sites in the higher risk flood zones. Development of basements in flood inundation zones are discouraged, and proposals should not prevent essential maintenance and upgrading of flood defences to be carried out in the future. Developments should also take into account the requirements of the Thames Estuary 2100 (TE2100) Plan in regards to the implementation of current and future improvements to the River Thames tidal flood defences. The River Thames Scheme (Datchet to Teddington) is a proposed programme of projects and investment to reduce flood risk. SUDS will help reduce surface water flooding. This policy should make homes and communities more resistant &/or resilient to flooding now and in the future taking into account the effects of climate change.

**Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )**

In areas at risk of flooding, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted.

**Policy LP21 Flood Risk and Sustainable Drainage (original)**

A policy that guides development to areas of lower flood risk, sets out where basements will be acceptable given their potential vulnerability, promotes sustainable drainage and sets out the drainage hierarchy, and protects flood defences.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel							Neutral
4. Energy							Neutral
5. Water	+		+	+	+	+	Promotes SUDS which should have positive impacts
6. Biodiversity							Neutral
7. Landscape & townscape							Neutral
8. Green spaces		+		+	+	+	Policy encourages creating spaces that will become part of the Green Infrastructure network

9. Best use of land & sustainable construction							Neutral
10. Housing				-/?	-	-	May reduce opportunities for new housing
11. Safer and cohesive communities	+		+	+	+	++	Sequential test should help reduce risk to humans from flooding and inundation
12. Health & well-being	+		+	+	++	++	A positive effect for health and well-being, as it should reduce flooding.
13. Borough centres							Neutral
14. Economy		+	+	+	+	+	Flood defences and Sequential test should help reduce risk to humans and property from flooding and inundation
15. Commercial development opportunities							Neutral
<p><b>Summary of assessment: (likely sustainability impact of the option)</b>  This policy has overall a positive impact, in particular in terms of environmental and social perspectives.</p>							
<p><b>Conclusion: (additional comments on individual objectives and cumulative effects)</b>  New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change, such as increased risk of flooding. The policy sets out the Sequential Test to guide development to less risky locations and the Exception Test to allow redevelopment of existing developed sites in the higher risk flood zones. Development of basements in flood inundation zones are discouraged, and proposals should not prevent essential maintenance and upgrading of flood defences to be carried out in the future. Developments should also take into account the requirements of the Thames Estuary 2100 (TE2100) Plan in regards to the implementation of current and future improvements to the River Thames tidal flood defences. The River Thames Scheme (Datchet to Teddington) is a proposed programme of projects and investment to reduce flood risk. SUDS will help reduce surface water flooding. This policy should make homes and communities more resistant &amp;/or resilient to flooding.</p>							
<p><b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b>  In areas at risk of flooding, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted</p>							

**Policy LP28 Social and Community Infrastructure (modified)**  
A. The Council will work with service providers and developers to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage.

**New social and community infrastructure**

B. Proposals for new or extensions to existing social and community infrastructure will be supported where:

1. it provides for an identified need;
2. is of a high quality and inclusive design providing access for all; and
3. where practicable is provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which increases public access.

**Loss of social or community infrastructure**

C. Loss of social or community infrastructure will be resisted. Proposals involving the loss of such infrastructure will need to demonstrate clearly:

1. that there is no longer an identified community need for the facilities or they no longer meet the needs of users and cannot be adapted; or
2. that the existing facilities are being adequately re-provided in a different way or elsewhere in a convenient alternative location accessible to the current community it supports, or that there are sufficient suitable alternative facilities in the locality; and
3. the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need has been fully assessed. This should include evidence of completion of a full and proper marketing exercise of the site for a period of at least two consecutive years in line with the requirements set out in Appendix 5.

D. Where the Council is satisfied that the above evidence has been provided and the change of use away from social and community infrastructure use has been justified, redevelopment for other employment generating uses or affordable housing should be considered.

**Impacts on existing social infrastructure**

E. Development proposals for 10 or more residential units should assess the potential impacts on existing social and community infrastructure in order to demonstrate to the Council that there is sufficient capacity within the existing infrastructure to accommodate the needs arising from the new development.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel			+	+	+	+	Should reduce the need to travel far for services.
4. Energy							Neutral



5. Water							Neutral
6. Biodiversity							Neutral
7. Landscape & townscape							Neutral
8. Green spaces							Neutral
9. Best use of land & sustainable construction			+	+	+	+	Co-location, dual use & flexible buildings will be a better and more efficient use of land
10. Housing							Neutral
11. Safer and cohesive communities			+	+	+	+	Providing services in suitable places, to meet various needs at the heart of local communities should improve cohesion
12. Health & well-being			+	+	++	++	A positive effect for health and well-being, as it should address sports needs and prevent the loss of existing indoor sports facilities.
13. Borough centres				?	?		Depends on locations, but if located in town centres will add to vitality
14. Economy					+		Such facilities may add to well-being of the area and to employment opportunities
15. Commercial development opportunities				+	+		New buildings may have to be built

**Summary of assessment: (likely sustainability impact of the option)**  
This policy has overall a positive impact, in particular in terms of society and the economy.

**Conclusion: (additional comments on individual objectives and cumulative effects)**  
Largely positive impacts by protecting existing uses and considering alternative sporting, social or community uses.

**Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )**  
To mitigate the impacts of development on existing services, financial contributions and / or planning obligations (also see the Planning Obligations SPD), and / or where appropriate, on-site provision of community facilities could be required.

A policy sets out to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage. It resists loss, and the demise of Assets of Community Value will be strongly resisted

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel			+	+	+	+	Should reduce the need to travel far for services.
4. Energy							Neutral
5. Water							Neutral
6. Biodiversity							Neutral
7. Landscape & townscape							Neutral
8. Green spaces							Neutral
9. Best use of land & sustainable construction			+	+	+	+	Co-location, dual use & flexible buildings, very positive
10. Housing							Neutral
11. Safer and cohesive communities			+	+	+	+	Providing services in suitable places, to meet needs at the heart of local communities should improve cohesion.
12. Health & well-being			+	+	++	++	Inclusive access allows people to stay independent.
13. Borough centres				?	?		Depends on locations; if located in town centres will add to vitality
14. Economy					+		Such facilities add to well-being of the area and employment

							opportunities
15. Commercial development opportunities				+	+		New buildings have to be built
<p>Summary of assessment: <i>(likely sustainability impact of the option)</i>  This policy has overall a positive impact, in particular in terms of society and the economy</p>							
<p>Conclusion: <i>(additional comments on individual objectives and cumulative effects)</i>  Largely positive impacts by protecting existing uses and considering alternative social uses</p>							
<p>Possible mitigation: <i>(measures to mitigate likely negative effects and enhance positive effects )</i>  To mitigate the impacts of development on existing services, financial contributions and / or planning obligations (also see the Planning Obligations SPD), and / or where appropriate, on-site provision of community facilities could be required.</p>							

**Policy LP29 Education and Training (Modified version)**

A. The Council will work with partners to encourage the provision of facilities and services for education and training of all age groups to help reduce inequalities and support the local economy, by the following means:

1. supporting the provision of facilities to meet the needs for primary and secondary school places as well as pre-school and other education and training facilities;
2. safeguarding land and buildings in educational use;
3. identifying new sites for educational uses as part of this Plan; the Council will work with landowners and developers to secure sites for pre-schools, primary and secondary schools as well as sixth forms to ensure sufficient spaces can be provided for children aged 2-18;
4. encouraging the potential to maximise existing educational sites through extensions, redevelopment or refurbishment to meet identified educational needs;
5. encouraging flexible and adaptable buildings, multi-use and co-location with other social infrastructure.

B. The Council will promote local employment opportunities and training programmes. Where the employment opportunities generated by construction as well as the end use of the development create more than 20 (Full Time Equivalent) jobs, a Local Employment Agreement, secured through a Section 106 agreement, will be required.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel			+	+	+	+	Should reduce the distance people need to travel for services.
4. Energy							Neutral
5. Water							Neutral
6. Biodiversity							Neutral
7. Landscape & townscape							Neutral
8. Green spaces							Neutral
9. Best use of land & sustainable construction			+	+	+		Co-location, dual use & flexible buildings, should be an efficient use of land
10. Housing							Neutral
11. Safer and cohesive communities			+	+	+	+	Providing schools and training within local communities should improve cohesion.
12. Health & well-being	+		+	++	++	+	Local Employment Agreements should provide opportunities for local employment, apprenticeships and work experience placements to enable residents to develop an appropriate skill-set for existing and future employment opportunities within the borough.
13. Borough centres				?	?		Depends on locations; if located in town centres will add to vitality
14. Economy					+		Such facilities add to well-being of the area and employment

							opportunities
15. Commercial development opportunities				+	+		New buildings have to be built
<p><b>Summary of assessment: (likely sustainability impact of the option)</b>  This policy has overall a positive impact, in particular if new development is located in accessible locations.</p>							
<p><b>Conclusion: (additional comments on individual objectives and cumulative effects)</b>  The policy has positive social and economic impacts</p>							
<p><b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b>  Multi-use and co-location of facilities contributes to optimising the use of land and can increase the wider community benefits of educational proposals. It might lead to increased public access, particularly of sports facilities (indoor and outdoor) through for example the use of school playing fields, sport clubs, other schools and community groups.</p>							

<p><b>Policy LP29 Education and Training (original)</b></p> <p>A policy that sets out how the Council will provide a sufficiency and diversity of school places needed within the borough, including promoting local employment opportunities and training programmes, and requiring Local Employment Agreements (LEA) in certain cases</p>							
SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel			+	+	+	+	Should reduce how far people need to travel
4. Energy							Neutral

5. Water							Neutral
6. Biodiversity							Neutral
7. Landscape & townscape							Neutral
8. Green spaces							Neutral
9. Best use of land & sustainable construction			+	+	+		Dual use & flexible buildings should be an efficient use of the land
10. Housing							Neutral
11. Safer and cohesive communities			+	+	+	+	Providing schools and training within local communities should improve cohesion.
12. Health & well-being			+	+	+	+	Skills, employment and training opportunities to be delivered. Multi-use of premises could increase sports provision.
13. Borough centres				+/?	+/?		If located in town centres could add to vitality
14. Economy	+		+	+	+		Could add to employment opportunities for local people
15. Commercial development opportunities	+			+	+		Providing new buildings
<p><b>Summary of assessment: (likely sustainability impact of the option)</b>  This policy has overall a positive impact, in particular, if located in accessible locations</p>							
<p><b>Conclusion: (additional comments on individual objectives and cumulative effects)</b>  The policy has positive social and economic impacts</p>							
<p><b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b>  Multi-use and co-location of facilities contributes to optimising the use of land and can increase the wider community benefits of educational proposals. It might lead to increased public access, particularly of sports facilities (indoor and outdoor) through for example the use of school playing fields, sport clubs, other schools and community groups.</p>							

**Policy: LP 42 Industrial Land and Business Parks (after modifications)**

The borough has a very limited supply of industrial floor space and demand for this type of land is high. Therefore the Council will protect, and where possible enhance, the existing stock of industrial premises to meet local needs.

**Retention of Industrial Space**

A. There is a presumption against the loss of industrial land in all parts of the borough.

Loss of industrial space (outside the locally important industrial land and business parks) will only be permitted where:

1. Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an industrial based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing use or an alternative industrial use completed over a minimum period of two continuous years in accordance with the approach set out in Appendix 5; and then

2. A sequential approach to redevelopment or change of use is applied as follows:

a. Redevelopment for office or alternative employment uses.

b. Mixed use including other employment generating or community uses, and residential providing it does not adversely impact on the other uses and maximises the amount of affordable housing delivered as part of the mix.

**Locally important industrial land and business parks**

B. The Council has identified locally important land and business parks (as set out in the supporting text and Appendix 6). In these areas:

a. loss of industrial floor space will be resisted unless appropriate full, on-site replacement floor space is provided;

b. development of new industrial floor space and improvement and expansion of existing premises is encouraged; and

c. proposals for non-industrial space will be resisted where the introduction of such uses would have an adverse impact on the continued operation of the existing services adversely impact on industrial activities.

**New industrial space**

C. Development of appropriate scale industrial uses, and improvement and expansion of such premises, is encouraged. New industrial space should be flexible and adaptable for different types of uses activities and suitable to meet future needs, especially to provide for the requirements of local businesses.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution						-/?	Possible concentration of uses likely to cause adverse impacts is balanced by less need to travel far.
3. Travel	+		+	+	+	+	Should reduce how far people need to travel
4. Energy							Neutral

5. Water							Neutral
6. Biodiversity							Neutral
7. Landscape & townscape							Neutral
8. Green spaces							Neutral
9. Best use of land & sustainable construction			+	+	+	+	Intensive use & flexible buildings should be an efficient use of the land
10. Housing	+/?				?	+/?	Some housing to meet local demand is allowed as part of mixed-use schemes
11. Safer and cohesive communities	+		+	+	+	+	Providing jobs and services within local communities should improve cohesion.
12. Health & well-being					+	+	Employment and training opportunities may be delivered locally
13. Borough centres							Neutral
14. Economy	+		+	+	+	+	Could add to employment opportunities for local businesses and people and promote local sustainable economic growth
15. Commercial development opportunities	+			+	+		Providing new flexible workspace and buildings
<p><b>Summary of assessment: (likely sustainability impact of the option)</b>  This policy has overall a positive impact, in particular, if development is located in accessible locations and supports the needs of the borough.</p> <p><b>Conclusion: (additional comments on individual objectives and cumulative effects)</b>  The Council policy will support the local economy and help to retain the reservoir of industrial-type services such as vehicle repair garages, which serve the local communities</p> <p><b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b>  The other Plan policies, such as LP10, Local environmental impacts, pollution and land contamination, will help to ameliorate visual, pollution and amenity impacts of industrial proposals. The replacement provision should be appropriate with regard to the site circumstances and the needs of the borough.</p>							

**Policy: LP 42 Industrial Land and Business Parks (original)**

A policy that seeks to protect existing and encourage new provision of industrial space. It also identifies locally important industrial land and business parks.



SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste							Neutral
2. Pollution: air, noise, light, water and soil pollution						-/?	Possible concentration of uses but less need to travel.
3. Travel			+	+	+	+	Less need to travel
4. Energy							Neutral
5. Water							Neutral
6. Biodiversity							Neutral
7. Landscape & townscape							Neutral
8. Green spaces							Neutral
9. Best use of land & sustainable construction							Neutral
10. Housing					-/?	?	-
11. Safer and cohesive communities			+	+	+	+	Provision of local community facilities and services
12. Health & well-being					+	+	Local job and service opportunities.
13. Borough centres							Neutral
14. Economy			++	++	++	++	High quality industrial space is one essential for sustainable economic growth
15. Commercial development			+	+	+	+	Development opportunities

opportunities							
<p>Summary of assessment: <i>(likely sustainability impact of the option)</i>  This policy has overall a positive impact, as it ensures the continued economic success of the borough.</p>							
<p>Conclusion: <i>(additional comments on individual objectives and cumulative effects)</i>  The Council policy will support the local economy and help to retain those industrial-type services such as vehicle repair garages for local communities.</p>							
<p>Possible mitigation: <i>(measures to mitigate likely negative effects and enhance positive effects )</i>  Visual, pollution and amenity impacts of industrial proposals should be minimised, in line with policies on Local Character and Design.</p>							

## Site Allocations

### SA 8 St Mary's University, Strawberry Hill (modified version)

Retention and upgrading of St Mary's University and its associated teaching, sport and student residential accommodation. Upgrade works to include refurbishment, adaptation, intensification, extensions and new build elements on site where appropriate justified with regard to national policy and the policies of the development plan.

A Masterplan and/or site development brief, which encompasses the main campus in Strawberry Hill as well as Teddington Lock, together with new estates and student accommodation strategies, will be prepared in conjunction with the Council. This will guide future development for St Mary's University, both on and off site.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste	-		-			-	With intensification of uses and new build on the site. Operation of The waste hierarchy should minimise/mitigate any potential negative impacts
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel	-			-		-	intensification of uses on the site may generate more trips

4. Energy	+		+	+		+	Opportunity to incorporate some low/zero carbon and renewable energy technologies, subject to the preservation of historic assets
5. Climate change adaptation, flood risk and Water	+		+	+			Potential to rebuild facilities with climate change adaptation measures; potential for green roofs
6. Biodiversity							Neutral
7. Landscape & townscape	?/-		?	?	?	?/-	adjacent to Strawberry Hill House and Gardens (Grade I Listed Building); it will depend on the detailed design scheme whether it will have positive or negative impacts on the heritage assets
8. parks and open spaces	?		?	?	?	?	partly within and adjacent to Strawberry Hill Historic Park & Garden; large majority of site is designated as MOL; there should be no new buildings on designated land
9. Best use of land & sustainable construction	-/+		?	?	?	?	Very limited potential for development without encroaching into MOL or Historic Park & Garden as the majority of the site is designated; some potential for incorporating sustainable construction techniques
10. Housing							Neutral
11. Health, well-being, secure communities							Neutral
12. Accessible local services	+		+			+	Potential for dual use and making some services accessible to the local community, but this will depend on the details of the scheme.
13. Borough centres							Neutral
14. Economy							Neutral
15. Commercial development opportunities							Neutral
<p><b>Summary of assessment: (likely sustainability impact of the option)</b>  Overall some impacts but also a number of uncertainties, which will depend on the details of any scheme and scale of new build and intensification.</p>							
<p><b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b>  In MOL&amp; Historic Park &amp; Garden – no new development is allowed. It is important to ensure no harm to the setting of the Grade I Listed Building and Gardens.</p>							

**SA 8 St Mary's University, Strawberry Hill (original)**

Retention and upgrading of St Mary's University and its associated teaching, sport and student residential accommodation. Upgrade works to include refurbishment, adaptation, extensions and new build elements on site where appropriate. A Masterplan site development brief, which encompasses the main campus in Strawberry Hill as well as Teddington Lock, together with new estates and student accommodation strategies, will be prepared in conjunction with the Council. This will guide future development for St Mary's University, both on and off site.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste	-		-			-	Subject to no intensification of uses on the site. Operation of waste hierarchy should minimise/mitigate any potential negative impacts
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel							Neutral subject to no intensification of uses on the site
4. Climate change mitigation/ Energy	+		+	+		+	Opportunity to incorporate some low/zero carbon and renewable energy technologies, subject to the preservation of historic assets
5. Climate change adaptation / flood risk & water	+		+	+			Potential to rebuild facilities with climate change adaptation measures; potential for green roofs
6. Biodiversity							Neutral
7. Landscape & townscape	?		?	?	?	?	adjacent to Strawberry Hill House and Gardens (Grade I Listed Building); it will depend on the detailed design scheme whether it will have positive or negative impacts
8. Parks and open spaces	?		?	?	?	?	partly within and adjacent to Strawberry Hill Historic Park & Garden; large majority of site designated as MOL; there should be no new buildings on designated land
9. Best use of land & sustainable construction	?		?	?	?	?	Very limited potential for development without encroaching into MOL or Historic Park & Garden
10. Housing							Neutral
11. Health & well-being, secure communities							Neutral
12. Accessible local	+		+			++	Sports facilities and playing fields are to be retained or re-provided.

services							Potential for dual use and making some services accessible to the local community, but this will depend on the details of the scheme.
13. Borough centres							Neutral
14. Economy							Neutral
15. Commercial development opportunities							Neutral
<b>Summary of assessment: (likely sustainability impact of the option)</b> Overall some positive impacts but also some uncertainties, which will depend on the details of any scheme and scale of new build.							
<b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b> MOL, Historic Park & Garden – no new development and ensure no harm to the setting of the Grade I Listed Building and Gardens							

<b>SA 17 St Michael's Convent, Ham Common (OSNI area as modified)</b>							
The Grade II listed St Michael's Convent and The Cottage have been declared surplus to requirements. Social and community infrastructure uses are the most appropriate land uses for this site. Conversion or potential redevelopment for residential uses could be considered if it allows for the protection and restoration of the Listed Buildings. The Proposals Map changes document sets out that the gardens are to be designated as OSNI and OOLTI.							
SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste	-		-	-	-	-	New and intensified uses are likely to increase the waste stream from this site
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel	-		-	-/?	-/?	-/?	Converting the existing buildings and intensifying the use of this site is likely to lead to an increase in traffic, particularly as the site has a "very poor" PTAL rating and therefore very limited public transport accessibility
4. Climate change mitigation/ Energy	-/+		-/?	-/?	-/?	-/?	Although there may be an opportunity to incorporate low/zero carbon and renewable energy technologies, this is likely to be limited due to

							historic building constraints. An increase in traffic would also lead to an increase in CO <sub>2</sub> emissions.
5. Climate change adaptation / flood risk & water							Neutral
6. Biodiversity	-		-	-	-/?	-/?	An intensification in uses and development on site will impact on the biodiversity. As a whole the OSNI designation protects a significant part of the site. However, the amended OSNI boundary removes acid grassland from the protected area. There are: an old orchard and lowland acid grassland present – habitats of principal importance in England. In addition are badgers and bat species including Daubenton's, a 300 year old Mulberry tree, and this site is an important part of the River Thames to Richmond Park Green Corridor. Great care is needed to prevent fragmentation of the Green Corridor. A careful management plan is needed to protect biodiversity. +/-
7. Landscape & townscape	+/?		+/?	+/?	+/?	+/?	A proposal for residential / community use, provided it is sensitively carried out is likely to contribute to the preservation of the Conservation Area, Listed Building and general character of the local area.
8. Parks and open spaces	?		+	+	+/?	+	This site is located opposite Ham Common, which is designated MOL, Public Open Space, and which also includes a Historic Park and Garden. There should be no new buildings on any designated land and no harmful impacts from the conversion onto the character of the area. The new designation as OOLTI has therefore positive effects upon the natural environment.
9. Best use of land & sustainable construction	+/?		+/?				If the site is declared surplus it could be considered that it would make better use of land.
10. Housing	+		+	+			Opportunity for more new homes, including a possibility for affordable homes
11. Health & well-being, secure communities	?		?	?	?	?	Potential loss of social infrastructure, although it is expected that some community provision will be re-provided on this site.
12. Accessible local services	-		-	-	-	-	This area is poorly provided with local services as it is outside a town centre (including outside 400m) of town centres and areas of mixed use.
13. Borough centres							Neutral

14. Economy							Neutral
15. Commercial development opportunities							Neutral

**Summary of assessment: (likely sustainability impact of the option)**  
Overall some positive as well as some negative impacts but also some uncertainties, which will depend on the details of any scheme. Although it would lead to a loss of social infrastructure, it should provide for some new homes and some community use. The proposal should contribute to the preservation and enhancement of the Conservation Area and the Listed Building by taking account of the sensitive local character. The designation as OSNI and OOLTI should protect the gardens as green space and preserve the setting of the Listed Building. A carefully prepared management plan may help protect its biodiversity and ecological assets

**Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )**  
To mitigate the loss of the social infrastructure, there should be some re-provision on this site, possibly in the form of community use. There should be no new development on designated OOLTI. Biodiversity – this is a very sensitive site and merits to be designated OSNI; any proposal needs to ensure that it will conserve and enhance the on-site biodiversity, including the acid grassland. Travel – ensure any proposal would have no added impacts on local traffic and parking provision.  
Waste – more activity and intensification on this site will inevitably generate more waste but this can be mitigated through the application of waste hierarchy and reuse of demolition waste. The Ham and Petersham Neighbourhood Plan may set out further guidance on design and appearance of any development proposal.

**SA 17 St Michael’s Convent, Ham Common (original)**  
The Grade II listed St Michael’s Convent and The Cottage have been declared surplus to requirements. Social and community infrastructure uses are the most appropriate land uses for this site. Conversion or potential redevelopment for residential uses could be considered if it allows for the protection and restoration of the Listed Buildings. The Proposals Map changes document sets out that the gardens are to be designated as OSNI and OOLTI.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste	–		–	–	–	–	New and intensified uses would be likely to increase the waste stream from this site
2. Pollution: air, noise, light, water and soil pollution							Neutral
3. Travel	-/?		-/?	-/?	-/?	-/?	Converting the existing buildings and intensifying the use of this site is likely to lead to an increase in traffic, particularly as the site has a “very poor” PTAL rating and therefore very limited public transport accessibility

4. Climate change mitigation/ Energy	-/?		-/?	-/?	-/?	-/?	Although there may be an opportunity to incorporate low/zero carbon and renewable energy technologies, this is likely to be limited due to historic building constraints. An increase in traffic would also lead to an increase in CO <sub>2</sub> emissions.
5. Climate change adaptation / flood risk & water							Neutral
6. Biodiversity	?		?	?	?/+	+	An intensification in uses could impact on the biodiversity. The new designation as OSNI has positive effects upon the natural environment.
7. Landscape & townscape	+/?		+/?	+/?	+/?	+/?	A proposal for residential / community use is likely to contribute to the preservation of the Conservation Area, Listed Building and general character of the local area.
8. Parks and open spaces	+/?		+	+	+/?	+	This site is located opposite Ham Common, which is designated MOL, Public Open Space, and which also includes a Historic Park and Garden. There should be no new buildings on any designated land and no harmful impacts from the conversion onto the character of the area. The new designation as OOLTI has therefore positive effects upon the natural environment.
9. Best use of land & sustainable construction	+/?		+/?				If the site is declared surplus, it could be considered that it would make better use of land
10. Housing	+		+	+			Opportunity for more new homes, possibly affordable homes
11. Health & well-being, secure communities	?		?	?	?	?	Potential loss of social infrastructure, although it is expected that some community provision will be re-provided on this site.
12. Accessible local services	-		-	-	-	-	This area is poorly provided with local services as it is outside of (including outside the 400m of) town centres and areas of mixed use.
13. Borough centres							Neutral
14. Economy							Neutral
15. Commercial development opportunities							Neutral
<p><b>Summary of assessment: (likely sustainability impact of the option)</b>  Overall some positive as well as some negative impacts but also some uncertainties, which will depend on the details of any scheme. Although it would lead to a loss of a social infrastructure, it would provide for some new homes and for community use. The proposal should contribute to the preservation and enhancement of the Conservation Area and the Listed Building, including taking account of the sensitive local character. The designation as OSNI and OOLTI should protect the gardens as green space and preserve the setting of the Listed Building</p>							
<p><b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b></p>							



To mitigate the loss of the social infrastructure, there should be some re-provision on this site, possibly in the form of community use. There should be no new development on designated OOLTI. Biodiversity – this is a very sensitive site and designated OSNI; any proposal needs to ensure that it will conserve and enhance the on-site biodiversity. Travel – ensure any proposal would have no impacts on local traffic and parking provision. Waste – more activity and intensification on this site will inevitably generate more waste but this can be mitigated through the application of waste hierarchy and reuse of demolition waste. The Ham and Petersham Neighbourhood Plan may set out further guidance on design and appearance of any development proposal.

**SA 24 Stag Brewery, Lower Richmond Road, Mortlake (modified)**

The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and/or re-provision and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste	–		–	–	–	–	Additional new and intensified uses are proposed on the site. Operation of the waste hierarchy should minimise/mitigate potential negative impacts
2. Pollution: air, noise, light, water and soil pollution	+		+		+/?	+/?	The soil quality may improve due to remediation of site. Strict air quality mitigation measures will be required due to the proximity of an Air Quality Focus Area
3. Travel	+/-		+/-	+/-		?	Reduction in use of larger lorries due to relocation of brewery but possible increase in smaller car/van traffic due to additional new school, sports/ leisure, residences and small businesses. Securing of transport improvements and sustainable modes of travel as part of a development proposal is expected.
4. Climate change mitigation/ Energy	+		+	+		+	Opportunity to incorporate some low/zero carbon and renewable energy technologies, including site wide decentralised energy subject to the preservation of the existing historic assets
5. Climate change adaptation /	+/-		+/-	+/-			Potential to rebuild facilities with climate change adaptation measures;

flood risk & water							i.e. potential for green roofs. Would increase number of people in a flood risk area, which needs to be mitigated.
6. Biodiversity	+			+	+		A number of TPOs on site. Will be opportunities to enhance biodiversity on site
7. Landscape & townscape	+		+	+	+	+	Potential for improved buildings, including restoration of the BTM on site, that enhance and make a positive contribution to the local character and conservation area. This will depend on the overall development/design and intensification on this site. To the north are grade II Listed Buildings whose setting should be enhanced. The OOLTI designated playing fields are to be retained and /or re-provided and upgraded within the site.
8. Parks and open spaces	+		++	+		+	Should take account of the adjacent River Thames designated MOL. Next to POS, Mortlake Green. Creates links between the river and the town and enlivens the riverside frontage. Creation of a new green/open space. Retention, and upgrading of the playing fields within the site.
9. Best use of land & sustainable construction	+		+				The proposal is likely to include sustainable design and construction Techniques.
10. Housing	++		++	+			An opportunities for many new homes including family housing and affordable units
11. Health & well-being, secure communities	+		+	+		+	New leisure uses will contribute to healthier lifestyles. Creates a new village heart for Mortlake
12. Accessible local services	+		+	+			Will provide new homes within the Mortlake AMU and provide access to employment, a new secondary school, health facilities, community and social infrastructure facilities, river-related uses and sport and leisure uses.
13. Borough centres	+		+			+	Is an established employment location close to East Sheen centre and AMU. Will reinforce the centre's role and add to the vitality of the area
14. Economy	++		++	++	++	++	Provision of new small scale hybrid business space, river related uses, and scientific and technical business would make a very positive contribution to the local economy & provide new jobs
15. Commercial development opportunities	+		+	+	+	+	Proposal would provide land for commercial development. Although it is not in a town centre location, it is very close to Mortlake Station, and will increase the variety of types of employment in the area.
<p><b>Summary of assessment: (likely sustainability impact of the option)</b>  Overall has many positive impacts; would make good use of previously developed land. There would however be some impacts on local transport provision and the strategic road network as well as potential impacts, depending on the detailed design of the scheme, on biodiversity, landscape, townscape, and parks &amp; open spaces, particularly with intensified and new uses, which would require mitigation, improvement and enhancement. Any proposed development should have regard to the adopted Site Brief.</p>							
<p><b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b>  Need to take account of cumulative impacts on the local area, local amenity and neighbouring properties due to a large increase in uses on this site. Improvements to highways and</p>							

sustainable modes of travel should be secured. Open spaces should be retained &/or reprovided and upgraded. More activity and development on this site will inevitably generate more waste but this can be mitigated through the application of waste hierarchy and reuse of demolition waste. To mitigate flood risk a FRA and Flood Emergency Plan should be required to ensure that development and its users/residents are safe. Guidance on design and local character for the area is set out in the Mortlake Village Planning Guidance SPD.

**SA 24 Stag Brewery, Lower Richmond Road, Mortlake (original)**

The Council will support the comprehensive redevelopment of this site. An appropriate mix of uses, particularly at ground floor levels, should deliver a new village heart and centre for Mortlake. The provision of an on-site new 6-form entry secondary school, plus sixth form, will be required. Appropriate uses, in addition to educational, include residential (including affordable housing), employment (B uses), commercial such as retail and other employment generating uses, health facilities, community and social infrastructure facilities (such as a museum), river-related uses as well as sport and leisure uses, including the retention and/or re-provision and upgrading of the playing field. The Council will expect the provision of high quality open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green space link to the riverside.

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste	–		–	–	–	–	Additional and intensified uses would increase the waste stream.
2. Pollution: air, noise, light, water and soil pollution	?		?				Uncertain but there might be a improvement in soil quality due to remediation on the site
3. Travel	+/-		+/-	+/-			Reduction in use of larger lorries due to relocation of brewery but possible increase in smaller car/van traffic due additional new school, sports/ leisure, residences and small businesses.
4. Climate change mitigation/ Energy	+		+	+			Potential to incorporate zero-/low carbon and renewable energy technologies including site wide heating network
5. Climate change adaptation / flood risk & water	+/-		+/-	+/-			Potential to rebuild facilities with climate change adaptation measures; potential for green roofs. Would increase number of people in a flood risk area, which needs to be mitigated
6. Biodiversity	+		+	+			A number of TPOs on site. Opportunities to enhance biodiversity on site
7. Landscape & townscape	+		+	+			Potential for improved buildings, including restoration of the BTM on site, that enhance and make a positive contribution to the local character and conservation area, but this will depend on the overall development/design and intensification on this site. To the north are grade II Listed Buildings whose setting should be enhanced

8. Parks and open spaces	+		+	+		+	Should take account of adjacent River Thames designated MOL. Next to POS, Mortlake Green. Creates links between the river and the town and enlivens the riverside frontage. Creation of a new green/open space. Retention of playing fields in their present location.
9. Best use of land & sustainable construction	+		+				The proposal is likely to include sustainable design and construction techniques
10. Housing	++		++	+			Opportunities for many new homes including family housing and affordable units
11. Health & well-being, secure communities	+		+	+		+	New leisure uses will contribute to healthier lifestyles. Creates a new village heart for Mortlake
12. Accessible local services	+		+	+			Will provide new homes within the Mortlake AMU and access to employment and a new secondary school, health facilities, community and social infrastructure facilities, river-related uses and sport and leisure uses.
13. Borough centres	+		+			+	Established employment location close to East Sheen centre and AMU . Reinforce the centre's role and add to vitality of the area.
14. Economy	++		++	++	++	++	Provision of new small scale hybrid business space, river related uses, and scientific and technical business would make a very positive contribution to the local economy & provide new jobs;
15. Commercial development opportunities	+		+	+	+	+	Proposal would provide land for commercial development, not in a town centre location although close to Mortlake Station, and will increase the variety of types of employment
<p><b>Summary of assessment: <i>(likely sustainability impact of the option)</i></b>  Overall positive impacts; would make good use of previously developed land. There would however be some impacts on local transport provision and the strategic road network as well as potential impacts, depending on the detailed design of the scheme, on biodiversity, landscape, townscape, and parks &amp; open spaces, particularly with intensified uses including a variety of new uses, which would require mitigation, improvement and enhancements. The existing Site Brief for this site should be taken into account</p>							
<p><b>Possible mitigation: <i>(measures to mitigate likely negative effects and enhance positive effects )</i></b>  Need to take account of cumulative impacts on local area, amenity and neighbouring properties due to a large increase in uses on this site. More activity and development on this site will inevitably generate more waste but this can be mitigated through the application of waste hierarchy and reuse of demolition waste. To mitigate flood risk a FRA and Flood Emergency Plan should be required to ensure that development and its users/residents are safe. Guidance on design and local character for the area is set out in the Mortlake Village Planning Guidance SPD.</p>							

If the site is declared surplus to requirements, appropriate land uses include social and community infrastructure uses.

Any redevelopment proposal for this site will be required to prioritise the provision of a new **Special Educational Needs 2 form entry primary school**

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste	-		-	-	-		Amount of waste is likely to increase; operation of waste hierarchy should minimise/mitigate any potential negative impacts.
2. Pollution: air, noise, light, water and soil pollution	+		+				Potential to improve soil quality by remediating potentially contaminated land
3. Travel	-/?		-/?				The development of a SEN school is regarded as being significantly less traffic generating than a primary school as there would not be individual drop offs and children are likely to travel by minibus.
4. Climate change mitigation/ Energy	+		+	+			Opportunity to incorporate low- & zero carbon technologies and renewable energy; buildings should be more energy efficient
5. Climate change adaptation / flood risk & water	+		+				Potential to include climate change adaptation measures, such as green roofs and walls.
6. Biodiversity	?		?				Potential impacts on Mortlake Cemetery which is designated OSNI. Opportunity to incorporate biodiversity features into the hospital site
7. Landscape & townscape	?		?				Redevelopment of this site could impact upon existing BTMs and adjacent Conservation Area (i.e. Queens Road, Mortlake Conservation Area)
8. Parks and open spaces							Neutral; the adjacent Mortlake Cemetery is designated OOLTI
9. Best use of land & sustainable construction	+		+	+	+		Providing a mix of social and community uses would maximise the potential of previously developed land if the site is declared surplus to requirements; potential for incorporation of sustainable construction measures
10. Housing				-	-		Not considered as appropriate for new housing development
11. Health & well-being, secure communities	-		-			-	Would lead to a loss of a health facility unless service is re-provided elsewhere
12. Accessible local services	+/-		+/-			-/+	Would lead to a loss of a health facility which could be considered an essential service/community facility unless service is re-provided

							elsewhere. However, a SEN school and other community facilities would be considered positive.
13. Borough centres							Neutral
14. Economy							Neutral
15. Commercial development opportunities							Neutral

**Summary of assessment: (likely sustainability impact of the option)**

Positive provided that there will be a new community use on the site and that there won't be a gap in health service provision. Provision of a special educational needs school, community and other educational facilities, may be considered an appropriate replacement for a hospital for older people. Impacts on biodiversity, landscape and the adjacent Conservation Area and Mortlake Cemetery will depend on the detailed design for the redevelopment for this site.

**Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )**

Redevelopment proposal would need to ensure that BTMs, boundary wall and existing character of the site are preserved and enhanced, and that the potential impacts on the adjacent Queens Road, Mortlake Conservation Area are taken into account. Important trees need to be retained and protected; impacts on adjacent OSNI need to be minimised. Minimisation of waste through implementation of waste hierarchy. Travel – the proposal will need to be subject to a satisfactory transport impact assessment. It is understood that the Council will be preparing a Site Brief at an appropriate time in partnership with the owners.

**SA 28 Barnes Hospital, East Sheen (original)**

**If the site is declared surplus to requirements, appropriate land uses include social and community infrastructure uses.**

**Any redevelopment proposal for this site will be required to prioritise the provision of a new 2-form entry primary school**

SA objectives	Geographic scale		Assessment / Length of effect			Cumulative	Commentary/explanation, uncertainties, proposed mitigation
	Local	Trans-boundary	Short term	Medium term	Long term		
1. Waste	–		–	–	–		Amount of waste is likely to increase; operation of waste hierarchy should minimise/mitigate any potential negative impacts
2. Pollution: air, noise, light, water and soil pollution	+		+				Potential to improve soil quality by remediating potentially contaminated land
3. Travel	-/?		-/?	-/?	-/?	-/?	Depending on the development proposal and given the existing access constraints, it may lead to an increase in traffic and congestion in the local area, which would need to be mitigated

4. Climate change mitigation	+		+	+			Opportunity to incorporate low- & zero carbon technologies and renewable energy; buildings should be more energy efficient
5. Climate change adaptation / flood risk & water	+		+				Potential to include climate change adaptation measures, such as green roofs and walls
6. Biodiversity	?		?				Potential impacts on Mortlake Cemetery which is designated OSNI
7. Landscape & townscape	?		?				Redevelopment of this site could impact upon existing BTMs and adjacent Conservation Area (i.e. Queens Road, Mortlake Conservation Area)
8. Parks and open spaces							Neutral; the adjacent Mortlake Cemetery is designated OOLTI
9. Best use of land & sustainable construction	+		+	+	+		Providing a mix of social and community uses would maximise construction the potential of previously developed land if the site is declared surplus to requirements; potential for incorporation of sustainable construction measures
10. Housing				-	-		Not considered as appropriate for new housing development
11. Health & well-being, secure communities	-		-			-	Would lead to a loss of a health facility unless service is re-provided elsewhere
12. Accessible local services	-/++		-/++	-/++		-/+	Would lead to a loss of a health facility which could be considered an essential service/community facility unless service is re-provided elsewhere; However, a primary school and other community facilities would be considered positive
13. Borough centres							Neutral
14. Economy							Neutral
15. Commercial development opportunities							Neutral
<p><b>Summary of assessment: (likely sustainability impact of the option)</b>  Largely positive, provided that there will be a new community use on the site and that there won't be a gap in health service provision. Provision of a primary school, community and other educational facilities, may be considered an appropriate replacement for a hospital for older people. Impacts on biodiversity, landscape and the adjacent Conservation Area and Mortlake Cemetery will depend on the detailed design for the redevelopment for this site.</p> <p><b>Possible mitigation: (measures to mitigate likely negative effects and enhance positive effects )</b>  Redevelopment proposal would need to ensure that BTMs, boundary wall and existing character of the site are preserved and enhanced, and that the potential impacts on the adjacent Queens Road, Mortlake Conservation Area are taken into account. Important trees need to be retained and protected; impacts on adjacent OSNI need to be minimised. Minimisation of waste through implementation of waste hierarchy. Travel – the proposal will need to be subject to a satisfactory transport impact assessment. It is understood that the Council will be preparing a Site Brief at an appropriate time in partnership with the owners.</p>							