London Borough of Richmond upon Thames Response to Draft London Plan Consultation

The Council welcomes the opportunity to comment on the Mayor of London's consultation on his Draft new London Plan. Please find comments to those policies the Council wishes to comment on set out below.

Analysis of Key Policies

1. **Chapter 1 Planning London's Future (Good Growth Policies)**
   1.1. **Policy GG1 Building strong and inclusive communities – Support**
   Welcome the overall positive approach of Policy GG1 to help build strong and inclusive communities.

   1.2. **Policy GG2 Making the best use of land – Object**
   The principle of the overarching objective to making the best use of land and the approach to developing on brownfield land first is supported. The Council is concerned however, as set out under other policies that the approach will lead to the creation of higher densities in inappropriate locations in outer London. A thorough review of brownfield sites and unimplemented permissions should be the principal concern rather than destroying the existing character and liveability of London. For example, developing on backgarden land or putting increased pressure on land and open spaces that have been designated as being of local importance. Focus should be on understanding why homes are not built despite having planning permission and the Council urges the GLA to work with Sir Oliver Letwin to review and explain the gap between the high number of planning permissions being granted in London against those built. This comment relates to the Council's overall comment that it makes about the lack of infrastructure to accommodate growth and considers both areas should be reviewed to fit with the Mayors approach to 'good growth'. The Council questions the level of growth set out in paragraphs 1.0.5 and 1.2.1 particularly as we are seeing increasing reports of people leaving London and will explore the level of growth further for consideration at the next stage of the London Plan process.

   1.3. **Policy GG3 Creating a healthy city – Support**
   The Council supports the overarching policy statement as it explicitly makes reference to planning playing a critical role in helping to improve Londoners' health and reduce health inequalities. It also acknowledges the impact that areas of deprivation have on peoples' health outcomes. The Council requests that the Plan explains what 'wider determinants of health' as non-health professionals may not beware of what it means. In Section E, where it mentions "improved access to green spaces and the provision of new green infrastructure" we would suggest the addition of "access to good quality green spaces". Green space on its own will not deliver benefits if such spaces are not attractive or useable.

   Involvement in arts and culture is proven to improve health outcomes, especially for the growing isolated elderly population and people with mental health issues. We recommend that culture should be specifically included in Policy GG3 as green space is.

1.4. Policy GG4 Delivering the homes Londoners need – Object

The Council supports the strategic principle to deliver the homes that Londoners need, including the strategic target of 50%, creating mixed and balanced communities across a range of sites. However, the Council strongly objects to new housing target which is considered overly ambitious and undeliverable. See comments to Policy 4.1 for detail. The Council is disappointed at the lack of collaboration with the GLA regarding the small sites element of the housing target and considers it to be unrealistic.

It should be noted that Part E is an aspiration which in reality local planning authorities have limited influence upon, aside from through conditions and legal agreements such as for review mechanisms, with limited resources for monitoring, and this is a point more applicable to lobby Government to ensure developers and landowners take an active role in implementation. The Council is concerned that there could be a risk of more blighted sites with more unfinished buildings given the limited powers Councils have to ensure developments are built out.

The London Plan's ambitions for housing growth would lead to a radical change in the nature of Outer London with far greater densities. There are three key issues which will have effects across the south London sub-region are address collectively below:

The first is that it is crucial that all plans for housing recognise not just the numbers of homes needed but the types. Homes need to be delivered that also meet the needs of parts of London with ageing populations and limited numbers of young graduates. It must ensure that there are sufficient levels of family housing that do not expect families to manage with two bedrooms.

The second is that housing targets presume that a large proportion of the new homes will be built on small sites. We acknowledge that small sites have provided more new housing over the time period since the last London Plan than had been anticipated. But much of this has been from Permitted Development, which we oppose due to its impact on local economic growth, and which has diminishing returns for housing numbers.

Small sites, whether from permitted development, or not present huge challenges for local authorities. It will require significant resources and expertise required to ensure that all small site developments meet the strong design requirements which we are pleased to see the London Plan contains.

Small sites also create challenges for ensuring sufficient amounts of affordable housing. We acknowledge that the GLA is encouraging boroughs to demand more contributions for affordable housing from smaller sites. However a careful balance will need to be struck as greater requirements for affordable housing is likely to decrease the numbers coming forward particularly while small site specialists are limited.

The small site criteria also fail to recognise the vast difference in the transport provision of different stations. South London has few tube stations, indeed there are twice as many

outside London as in the South London sub-region. Instead it relies on overground services. Some stations are very well served with a turn up and go service. However the vast majority are much more poorly served with many having a train only every half an hour. Metroisation is a shared objective of the South London Partnership, GLA and TfL but there are no guarantees that it will be delivered soon and to what extent development is suitable for the character of the surrounding area. Until it has been delivered small sites policy must distinguish between stations with vastly different levels of service.

Our third and most significant concern about good housing growth is infrastructure. There are parts of South London that are already struggling with a growth in housing numbers that hasn't led to the necessary increase in infrastructure whether that's public transport provision or social infrastructure such as schools and surgeries. The London Plan acknowledges that this infrastructure is essential but does not provide the plans or resources to tackle what will be an enormous challenge. It must be remembered that in order to win support from current residents for housing growth it will be important to show that new infrastructure will improve their experience as well as provide for new residents.

We are pleased that TfL and GLA are working with The Council and the SLP to produce a sub-regional strategy that will identify the infrastructure required for growth. But it is crucial that the London Plan is more specific about how it will provide this infrastructure given the scarcity of land and funding.

1.5. Policy GG5 Growing a good economy – Support.
The Council supports the overall policy, which is reflective of the Publication Local Plan Employment Policies. However, it is considered that further clarity could be provided within the Policy at Criterion C which states "Plan for sufficient employment and industrial land in the right locations to support economic development and regeneration"

The policy wording "right locations" is vague and could usefully more accurately reflect the supporting text at paragraph 1.4.10 which states:

"The CAZ and Northern Isle of Dogs will remain vital to London's economic success, but growth in town centres across London will be equally important, supporting local regeneration."

The Council emphases the importance of using a local evidence base to enable the protection of its key employment sites and making sure any residential development that is proposed is not to the detriment of industrial and office locations.

The Council and the South London Partnership welcomes the GLA's commitment to protecting employment floorspace and placing equal importance on employment as well as housing growth. London's capacity to generate new high quality employment is important not just locally but nationally. It is also vital to the future funding of public

services in London as the city becomes more reliant on its own business rates revenue for its budgets.

It is critical that growth is distributed not just in the Central Activities Zone but increasingly in our town and local centres. This will help produce additional business rate revenue, provide a more efficient use of our existing transport infrastructure by encouraging counter commuting, and produce a better quality of life by allowing more residents to live close to work.

Therefore we are committed to both improving and growing office stock in our town centres and maximising the use of our existing industrial land. The SLP have commissioned an Industrial and Business Land Study that is identifying the industrial and commercial land requirements and potential across the sub-region. This work has already shown the enormous demand for industrial land in the sub-region and the renaissance in demand for office space. The SLP will be publishing conclusions from the study in spring 2018 and it is hoped to work with the GLA on delivering.

1.6. Policy GG6 Increasing efficiency and resilience - Support.
Welcome the policy to deliver a zero carbon city by 2050.

2. Chapter 2 Spatial Development Patterns
2.1. Policy SD1 Opportunity Areas - Neutral.
There are no identified Opportunity Areas within Richmond. However, there is a section in chapter 2 on Crossrail 2 and references under Policies D6, T3, and T9. The need to reference this, given transport infrastructure needs, is recognised, however the references to supporting delivery of development are considered premature, given the route and benefits are not yet confirmed (see also comments under D6). It is understood this will be a matter for a future London Plan review. The implications of the context shown for Figure 2.5 as it affects this borough is therefore uncertain – the map and it's legend are unclear; it should take a much simpler approach to focus on the Opportunity Areas.

2.2. Policy SD2 Collaboration in the Wider South East & Policy SD3 Growth locations in the Wider South East and beyond – Neutral
The South London Partnership (SLP) is a sub-regional collaboration of five London boroughs: Croydon, Kingston upon Thames, Merton, Richmond upon Thames and Sutton. Through collaboration – between boroughs and with local public, private and voluntary and community sector partners – the South London Partnership is committed to accelerating and increasing the potential for economic growth in this area, beyond what can achieved individually. South London has a critical role to play in the capital's economic future. It currently houses a £28billion economy (larger than the cities of Manchester or Birmingham) with great opportunities for growth which can support and alleviate pressure on central London.

The SLP are committed to a vision of an increasingly polycentric London and have explained in the SLP's responses to both the Mayor's Transport Strategy and the London

Housing Strategy why this is crucial to delivering both the Mayor's and the SLP's vision for the sub-region. As New London Architecture said in its recent report London's Towns: Shaping the Polycentric City: "London's towns are the essential fabric of its everyday life: the multitude of 'stars' in the capital's 'constellation' that act as focal points for local communities, giving places distinctive identities."

The Council and the SLP are therefore very pleased to read in the foreword to the London Plan of the Mayor's vision for 'a city where people can spend less time commuting because we have so many thriving parts of London, with good affordable housing, combined with exciting, cutting-edge career opportunities.' This is a shared vision which we look forward to working with you to ensure that the London Plan delivers.

The SLP's commitment to delivering this can be shown in the work done with the GLA to agree four different Opportunity Areas within the sub-region. The SLP is delighted that it will soon be co-producing, with GLA and TfL, a Sub-regional Strategy to identify the infrastructure required for growth. This response should therefore be understood as support for this vision and a focus on those issues which must be addressed to deliver it.

The Council welcomes the recognition of the need for collaboration in the Wider South East and the Mayor's role. As an outer London borough, this is a strategic issue particularly with regard to housing and infrastructure needs. However there is no real evidence on joint working with Wider South East and assumptions continue to be made that all of London's housing need should be accommodated within Greater London; the Mayor should continue lobbying Government on accommodating some of London's need outside London, and letting London 'grow out'. The Plan should recognise and support the commuter corridors and supporting infrastructure needed to allow for growth outside of London. A detailed strategy should be developed to further support the potential of growth in the wider South East region which the Plan currently lacks. The Council urges the Mayor of London to further collaborate with the wider South East Councils.

2.3. Policy SD4 The Central Activities Zone (CAZ) & Policy SD5 Offices, other strategic functions and residential development in the CAZ – Neutral
No comment.

2.4. Policy SD6 Town centres – Part Object, part support
The overall policy is generally supported. There should be greater recognition that where there remains demand for additional retail floorspace, there are limited sites available and centres are generally buoyant, that policies should continue to encourage an appropriate level of diversification for that borough - there is not a one size fits all solution across the capital. Equally, where boroughs which do not have surplus retail or office space, as is the case in Richmond, it should be acknowledged that conversion to residential will not be appropriate in all locations.

2.5. Policy SD7 Town centre network - Neutral

The new Draft London Plan does not propose changes to the designation of centres in the Mayor's town centre network in Richmond upon Thames. Therefore, the Council's hierarchy as set out in the Local Plan is in alignment with it. It introduces some new, and revises existing policy guidelines for each centre in the network. In terms of commercial growth potential Teddington is classified as "Low" and East Sheen as "Medium". However, the evidence base suggests that Teddington is expected to accommodate a greater amount of the additional A1 to A5 floorspace required than East Sheen and has less vacant space to absorb the projection.

In terms of office guidelines, the borough could lose approaching a third of its office stock should all prior approvals be implemented, since the introduction of permitted development rights allowing change of use to residential. Local Plan policies for offices are aimed at increasing available office supply. There is some concern that a designation of "B" for Twickenham could jeopardise the ability of the centre to increase its supply.

2.6. Policy SD8 Town centres: development principles and Development Plan Documents - Support

Support for the policy's firm stance on out of centre development. Support for B 3) which recognises that diversification should be encouraged where there is surplus floorspace and the need to take account of local circumstances.

2.7. Policy SD9 Town centres: Local partnerships and implementation - Support

The proposal for active planning with town centre stakeholders is supported – but this does have resource implications which the Plan does not adequately address. And whilst BIDs, town centre partnerships etc are important, the local authority should be the principal agency for doing this.

2.8. Policy SD10 Strategic and local regeneration – Neutral

Generally supportive of such a policy as it seeks to tackle spatial inequalities by ensuring Local Plans identify Local Areas for Regeneration taking into account local circumstances, the demographic make-up of communities and local needs.

3. Chapter 3 Design

3.1. Policy D1 London's form and characteristics - Support

Policy D1 is generally supported. The greater emphasis on the need for development proposals and designs to respect, enhance and utilise heritage assets and architectural features of merit (see D1 B4) is particularly welcomed in the context of Richmond's historic and high-quality environment. However, it is considered that this would be further strengthened from adding the word 'conserve'.

The additional text (paragraph 3.1.1 to 3.1.12) is considered to helpfully explicate different aspect of the policy, however it lacks reference to a vision for London as a World City. While its inclusion is welcomed, the reference to London's circular economy route map would also be more appropriate in 'Policy D2 Delivering good growth by design'.

3.2. Policy D2 Delivering good design – Object

Policy D2 includes a number of aspects and mechanisms that promote good design and is supported in principle. However, the requirement for boroughs to use design review (Parts F and G) is considered to be overly prescriptive and potentially onerous in the context of boroughs where these are not currently operated, such as Richmond. Local Authorities are well placed to make decisions on their requirements for development applications, and should be allowed to set up their own processes and management to best suit local circumstances. It is proposed that, as in Part C, that the text 'Where appropriate' is added to Part F.

Whilst the importance of maintaining design quality from application to build out stage is recognised, clarification is sought as to how legally robust it would be for Local Authorities to include architect retention clauses in S106 legal agreements as is ought in the Plan (Part H4). An alternative option would be to seek a developer contribution for the assessment of details required under a condition of consent, and for the inspection of the work on site to ensure compliance.

In Policy D2 C whilst the use of 3D modelling to support proposals is welcomed, the GLA should take the lead in prescribing the parameters for their use. It would seem practical for each London Borough to be using compatible systems so that analysing applications for tall buildings can be shared with adjacent boroughs as well as with the public as part of consultations. Cumulative development considerations are very important to consider when assessing schemes. Appropriate weighting should be given to the assessment of environmental conditions and the impact of clusters of large scale/tall buildings.

It is recognised that reference is made in the following text (paragraph 3.2.6) to the role that the Mayor's Design Advocates will have in supporting the operation of the policy (including in the use of design review), however this is very general. Further clarify on the role and extent of the help that local authorities might reasonably expect would be useful.

3.3. Policy D3 Inclusive design - Support

Support continued cross cutting approach to inclusive design. Pick up references to emergency evacuation under Policy D11).

3.4. Policy D4 Housing quality and standards – Part Support.

Support the general approach to housing standards, including minimum internal space standards.

There should be reference in the supporting text to exceptions to units below the space standards, with assessment on a case by case basis whether these will still provide a satisfactory standard of accommodation for future occupiers and meet local needs e.g. by Registered Providers in light of affordability concerns, or where a conversion in a Conservation Area may not provide any external amenity space.

There should be clarification with regard to paragraph 3.4.2 and how an assessment will be made as to whether proposals are significantly above the internal space standards – the need for efficient use of land is recognised, however in Richmond there is also a need for family dwellings to provide sufficient spaces, and recognise that for conversions and on awkward sites other factors will influence the proposed layout of units.

3.5. Policy D5 Accessible housing - Support

The Council supports the policy, and the supporting text which advocates the use of planning conditions and sets out what they should contain to ensure building control compliance with the M4(2) and M4(3) dwelling standards.

3.6. Policy D6 Optimising housing density - Part support / Part Object

Support in principle for removal of the density matrix. The Council considers that the London Plan density matrix is too crude to apply on a site-level basis and therefore applicants/developers should fully consider all other characteristics. The approach is welcomed as setting, context and character have always informed what can be delivered on sites in Richmond borough. Decision making regarding density should never be led by a blunt density tool which is what the Council considers the Matrix to be. The matrix has never been an effective tool in which to assess sites as the important consideration is what harm a development does to the local character of the area, its residents and businesses. As a general guide, density should be an output and not an input consideration when designing development schemes. Rather than being guided by the density matrix, the Richmond Local Plan requires full consideration of the site's characteristics, surrounding and wider area including their settings, proposed mix of uses, green spaces, landscaping and public realm, play space requirements, servicing and access arrangements etc. Once all these have been fully considered and an appropriate scheme drawn up, then density can be measured - however, it should not inform the design of a scheme.

We strongly object to para 3.6.1. which refers to 'developing at densities above those of the surrounding area on most sites'. The Council's evidence base establishes that the scope for higher densities is limited by the distinctive local character of the borough, its heritage assets and views. There needs to be greater reference to the sensitivity of the local environment.

The policy is prescriptive in tone, with regard to 'optimising' housing density, however appears rather weak in relation to the relationship of density to the sensitivity of settings-although at the end of the policy it says '…built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development.' Higher densities will have implications for integrating new developments successfully with existing sensitive settings, and relating to the prevailing balance of built form to landscape, for example.

Concern that the implication in criteria C, that the higher the density of a development the greater level of scrutiny of its design is required, is misleading. All development proposals should be capable of scrutiny, as in sensitive locations even lesser density can have a significant impact.

Support for assessing infrastructure capacity as a key element in determining potential density that can be supported. However this will be critical to infrastructure delivery and will depend on whether criteria B can be successfully implemented with inputs from providers and the ability to assess tipping points and needs in advance of development proposals coming forward. This needs further clarity. The reference to development contingent on future infrastructure with regard to Crossrail 2 in paragraph 3.6.4 should be clarified (see also comments under SD1).

3.7. Policy D7 Public realm – Support
The policy identifies a broad range of considerations that should be taken into account in the design and delivery of the public realm, and is generally supported.

The recognition that the public realm consists of a network of spaces (potentially serving different uses at different times) is welcome. However, the policy takes a broad definition of what constitutes London's public realm, including shopping malls, sky gardens, and viewing platforms (see paragraph 3.7.1). This is broader than the definition of the public realm in Richmond's Local Plan. In instances where improvements to the public realm are sought at a local level as part of a development scheme, it is not intended that these should be provided in the form of the above amenities, particularly where they might be inaccessible from street level (e.g. sky gardens) or support a specialist function (e.g. shopping malls). Instead, the policy should recognise the strategic urban design importance of more traditional and accessible forms of public space – such as streets, squares, parks and open spaces.

The importance of creating pedestrian and cycle friendly spaces in identified areas (such as town centres) should be emphasised in Part D.

The inclusion of appropriate management and maintenance arrangements to protect the open use of the public realm, as established through the forthcoming Public London Charter, is welcomed. The document should be prepared in conjunction with London Boroughs and other organisations concerned with public realm matters.

3.8. Policy D8 Tall buildings - Object
The Council welcomes the plan-led approach to defining what is considered to be a tall building, based on local context – local judgement regarding the location, impacts and heights of taller buildings is essential to good decision making. However, there has been a shift of emphasis in this draft policy, which the Council believe could result in inappropriate development in boroughs – such as Richmond – that have a high-quality and historic built environment that is particularly sensitive to the impacts of tall buildings.

The policy is considered to be more promotional of tall buildings than in the adopted London Plan, and it is not explicit in its consideration of local character and setting, particularly where these design considerations would mean that the siting of a tall building is inappropriate. Wording in the adopted Policy 7.7 which encourages boroughs to identify

areas that are 'sensitive' to or 'inappropriate for' tall buildings has been removed from the draft policy, and is instead briefly identified in paragraph 3.8.1. Richmond Council carefully plans its tall buildings to take into account local character and setting, and would not wish to see these design considerations diminish. The draft policy could therefore benefit from a more direct statement that tall buildings should not be considered where they would adversely affect existing character in sensitive locations (see, for example, adopted Policy 7.7 C b & c).

The draft policy also emphasises the role of tall buildings – and specifically the height of the building (see Part B2) – in contributing to the increased housing figures identified elsewhere in the Plan. While the Council acknowledges the necessity and challenge of accommodating London's expected growth, this emphasis on additional height to support new housing should not weaken other policy objectives and careful design and place-making considerations, which could risk undermining the support new housing.

Under Part 2C (Functional Impact), there is scope to include reference to 'active design' to encourage and provide opportunities for physical activity in tall buildings to promote good health and wellbeing.

3.9. Policy D9 Basement development – Neutral

The London Plan just requires LPAs to have a policy to address the negative impacts of large-scale basement development beneath existing buildings. This we have, along with an Article 4 Direction to remove the permitted development rights for subterranean developments in flood hazard areas and across the whole borough. It means that once it comes into force on 1 April 2018, planning permission will be required for basement and subterranean developments.   The text following the London Plan Policy D9 details problems that the construction of basements can cause in high density residential environments but the Policy does not contain any wording in recognition of the problem or how to deal with issues that arise.

3.10. Policy D10 Safety, security and resilience to emergency – Neutral

The Council supports the maintenance of safe and secure buildings and environment and collaborates with the various emergency Authorities in London. Technical mandatory requirements as set out in Part Q Building Regulations (e.g. secure doorsets and windows) are set out in SPG related to Designing out Crime.

3.11. Policy D11 Fire safety –Neutral/Object

The rationale for the new policy on Fire safety standards is understood and the Council wouldn't disagree with importance of fire safety; but this goes beyond the remit of planning and is already dealt with via Building Regulations; there is a danger that new fire safety requirements within planning will require new skills by case officers and could potentially delay the planning application process, particularly if Fire Statements have to be verified. The policy creates legal uncertainty via refusing an application without a Fire Statement, as this is considered under a different legislative framework.

The Policy is already covered under the Building Regulations part B - B1 Means of Warning and Escape, B2 Internal Fire Spread (Linings), B3 Internal Fire Spread (Structure), B4

External Fire Spread and B5 Access and Facilities for the fire service. Additionally, the Regulatory Reform Fire Safety Order (2005) requires premises to have a fire risk assessment provided by a competent person which can be produced on demand for the fire authority and relates to the occupation of the premises which can also address the fire strategy, specific design details and operating factors presented by the occupation of the premises. Part B1 will also address (along with the RRO) specific evacuation plans for the disabled in addition to the facilities for evacuation required in the design under part B1.

The Building Regulations and allied legislation already addresses these issues in depth and the inclusion as a policy is unnecessary as it is covered by the Building Control Body.

3.12. Policy D12 Agent of Change – Support
This accords with the Council's attempts to ensure that the inclusion of new residential use within mixed-use schemes should not adversely impact upon the continued operation of nearby established employment uses. Placing the onus of noise mitigation on the new noise-sensitive development is welcomed and further guidance is sought as to appropriate mitigation measures and how these can be secured through planning agreements if required.

3.13. Policy D13 Noise – Support
No comment

4.   Chapter 4 Housing
4.1. Policy H1 Increasing housing supply – Object
New housing targets are unrealistic (see further comments below on small sites, although the large sites figures can be achieved and is more realistic).

GLA officers have suggested a different housing delivery test is sought for London, however there is no confirmation that Government's proposed methodology will not be applicable to London Boroughs in the future. The serious implications of the higher housing target will put the borough is a position where, even working with the Mayor, it cannot be foreseen how identified shortfalls can be overcome to identify a robust future housing land supply (such a high reliance on unidentified windfalls will not be a sustainable position). To offer some flexibility, the policy wording should accommodate the scenario of looking at the overall delivery target and include a mechanism to incorporate the small sites figure into the large sites target. The Council welcomes further discussions with the GLA to work on the mechanism and to develop this option further.

Given the significant environmental constraints across the borough and the scale of intensification required, concern that the identified HRA and IIA mitigation and monitoring methods to reduce any significant adverse environmental effects will offer sufficient protections.

The London Plan policy H1 (Increasing housing supply) may result in increased urbanisation and demand for recreational greenspace, and on the basis of the precautionary principle we

believe has the potential to impact adversely on the integrity of the Richmond Park SAC. We are concerned about the plans for significant housing growth, some 811 new homes p.a., or 634 annualised average completions which will come from small sites, intensification, densification and windfall sites. The primary habitat for stag beetle sightings is suburban gardens and the most obvious problem for the beetles, apart from predation by domestic cats and others, is a significant loss of habitat. London's surviving open spaces have sadly been developed, including many types of woodland. Development will continue to reduce stag beetle habitats and amounts of dead or rotting wood, which is the stag beetle's food source, will have been tidied away. Incremental intensification is likely to reduce the amount of gardens and natural habitats such as woodlands. The plan does not identify any specific housing allocations but the quantum of growth has the potential for likely significant effects upon Richmond Park SAC.

4.2. Policy H2 Small sites – Object

The Council raises serious concerns over intensification and assumptions made in existing residential stock, and the new policy on the presumption in favour of small developments.

The approach fails to understand the constraints and opportunities affecting small sites in the borough. The Council's comments regarding the small sites methodology are further detailed in the attached Appendix. The methodology for this part of the assessment was undertaken by the GLA with no involvement of boroughs.

The policy is based on a fundamental transformation in how new homes are delivered, including the Mayor's Housing Strategy, however aside from a general presumption in favour of small housing development (when there already exists a presumption in favour of sustainable development as set out in the NPPF) there are no real mechanisms that will increase delivery to the extent of the borough target. Redevelopment and conversions cannot be viable where there are such existing high value land uses across many parts of the borough.

The Council already provides guidance in a Small and Medium Housing Sites SPD and Village Planning SPDs covering the whole borough, to understand the context of local character. Given the significant coverage of conservation areas in the borough and the duty to preserve or enhance, it would be unrealistic to promote increased housing and densities by means of area-wide design codes.

With relation to Part H, the Council already applies affordable housing policy requirements to all small sites. In some circumstances, on former employment sites, there is an expectation to explore on-site affordable housing; for other types of sites the requirement is for a financial contribution. The Policy should recognise that local needs and evidence should determine the thresholds. In the context of national guidance, the policy should support this unequivocally if it forms part of London's local circumstances and aids the implementation of the Mayor's strategy to meet affordable housing needs.

4.3. Policy H3 Monitoring housing targets – Neutral

No comment.

4.4. Policy H4 Meanwhile use – Support
Support general approach, where opportunities arise. There may however need to be flexibility for example on residential standards (see comments under Policy D4) given the temporary nature of the use and bearing in mind viability.

4.5. Policy H5 Delivering affordable housing – Support
Support the strategic target of 50%. It should be recognised that local needs and evidence will determine borough thresholds, to address priority needs.

The Council does, however, insist that all sites delivering less than 50% affordable housing submit a viability appraisal to support the level of affordable housing being proposed. The Council also seeks on-site provision of affordable housing on all former employment sites.

Support the emphasis in part B on on-site provision to deliver mixed and inclusive communities, and that off-site or cash in lieu must only be provided in exceptional circumstances. Given the borough's affordable housing needs and limited land opportunities, the guidance in paragraphs 4.5.6 to 4.5.10 is considered helpful.

4.6. Policy H6 Threshold approach to applications - Neutral
While the Council broadly welcomes this approach to increase delivery, the Council's Local Plan (and previously adopted Core Strategy and Development Management Plan) seek 50% affordable housing of which 40% will be rented and 10% intermediate. This is slightly different to the Mayor's proposals of 30% LAR, 30% Intermediate and 40% LA discretion (assumption LAR). LBR also seeks to maximise delivery of affordable homes so how would this policy be tested if a 35% level was offered and yet the LPA felt more was achievable. The Council's policy requirements on former employment sites seek on site provision of affordable housing, a 50% minimum. The Council may also wish to test the viability of providing other planning obligations as well as affordable housing.

4.7. Policy H7 Affordable housing tenure – Neutral
The Council broadly supports the tenure split although this does not completely match local policy on rented intermediate tenure splits. However, the Council does not support the SHMA findings for the percentage of one bedroom homes that is indicated. This is excessive for the borough and is not supported by the Richmond SHMA (2016) that provided the evidence for the Council's Local Plan. On balance the Council would prefer to see the tenure mix determined by the local planning authority and consult with GLA Officers as appropriate.

The Council would also measure the percentage of affordable housing in habitable rooms or floor space in order to ensure that where possible the Council could secure family sized rented homes, which is a priority. There could be a number of ways in which the delivery of affordable housing could be measured in order to demonstrate that delivery has been maximised.

4.8. Policy H8 Monitoring of affordable housing – Neutral.

The Council supports the policy but flexibility should be offered on the level of monitoring detail required in the short term to give the opportunity for the Council to adapt its monitoring process to ensure more detailed reporting in the longer term.

4.9. Policy H9 Vacant building credit –Support.

Welcome the stricter assessment of when VBC is applied and the evidential test required.

4.10. Policy H10 Redevelopment of existing housing and estate regeneration - Neutral.

The Councils is supportive of the principles, subject to viability.

4.11. Policy H11 Ensuring the best use of stock - Support

Whilst welcoming this principle of reducing the levels of empty homes, the Council would like to see clarification that older residents who may temporarily leave their homes, to assess residential or other types of accommodation offers, are not penalised by this approach.

4.12. Policy H12 Housing size mix - Part Object

The Council raises concerns around the loss of family housing, for which there continues to be an evidenced need in the borough (2016 SHMA). London Plan policies still need to allow Boroughs to develop their own evidence base on housing needs, mix and tenure.

The criteria in part A provides useful criteria to determine appropriate mix, having regard to the nature and location of the site.

The Council is concerned in relation to Part C in so far as the Council has an Intermediate Housing Policy statement that seeks to ensure a range of accommodation at different price points to meet the needs of residents and local workforces. Therefore some control needs to be recognised in relation to the intermediate units provided as well as the social rented homes.

4.13. Policy H13 Build to Rent - Part Object

The Council recognises that the PRS can assist in meeting a range of needs and be particularly suitable for certain locations, however wholly PRS proposals are unlikely to be supported by the Council where they do not contribute to the higher priority need for affordable housing, given the limited opportunities for sites of 50 units and above.

The Council is concerned in relation to the affordability and usefulness of this product given that it is the highest valued Outer London Borough and in some parts of it LLR would not help to meet evidential housing need for single and couple households. Analysis of the proposed LLR rent levels suggest that for one bedroom homes these would either significantly exceed or be equivalent to market rents. For 2 bed homes in 8 wards these levels are equivalent to 88% market rents, suggesting that the product will not help to meet housing need. Existing evidence from the recently published SHMA, shows the

priority is for lower rented affordable homes, having the fourth lowest stock in London. The SHMA demonstrated that 38% of households have incomes below £40,000, with 19.5% between £40 and £60,000. In only 5 wards in the borough (for two bedroom homes) would the LLR household incomes be below £40000, this would therefore not meet the needs of households aspiring to form a family and move towards home ownership. The principle of supporting an increased supply of private rented homes with greater security of tenure would be welcomed.

4.14. Policy H14 Supported and specialised accommodation – Support

The Council welcomes a strong statement on the need for supported accommodation. This must be adequately financed given it is often small scale and therefore difficult to financially stack up. Furthermore this is also reliant on adequate revenue funding streams that are currently the subject of national consultation. In terms of pan London delivery, this has always been challenging when people with high level support needs are moved away from family and support networks. Furthermore, when public bodies seek to disinvest from one area without fully addressing the social infrastructure needs of that area in terms of replacement provision this will cause local difficulties. Whilst the Council may broadly support and acknowledge that there is a level of modernisation required in the sector (moving away from conversion properties in some instance to more bespoke and adaptable housing) this should not be at the expense of local provision.

4.15. Policy H15 Specialist older persons housing - Part support /part object

As the population ages it is important that there is specialist accommodation available in particular residential nursing care including end of life/hospice care and dementia care. However it is critical that such supply are linked to identified need in the boroughs. Further such accommodation should not be hidden away but need to be well connected to localised facilities to enable residents to have access to social infrastructure, shopping, health care and public transport facilities.

In relation to H15 A1 the Council disagrees with the methodology behind the benchmarks for older people's housing detailed in table 4.4. The GLA Plan fails to address migration and the housing available in adjacent areas, some of which are not in the GLA boundary. The Council's local evidence, developed with housing, public health and commissioning colleagues, should be used to inform priorities. For this borough there is evidence on Retirement housing and Extra Care Accommodation, and the Richmond SHMA, which recognises the context among other housing priorities. Any C2 applications should only be considered in the light of local housing evidence for them. They should be strongly resisted where there is no proven need for the accommodation and the application is merely a vehicle to by-pass affordable housing obligations. There should always be an assessment of the relevance of the accommodation offered by social care and health services. Support part B (i) as an affordable housing requirement is considered necessary from all types of housing.

Support the clarification in paragraph 4.15.3 of the definitions for C2 and C3.

4.16. Policy H16 Gypsy and Traveller accommodation - Object.

There is no rationale for the London Plan adopting a new definition, different to the national definition, particularly as the Plan leaves to boroughs to undertake local assessments. The change in the Government definition was on the basis that it is fair that if someone has given up travelling permanently then applications for planning permission should be considered as they are for the settled community. This is particularly important in London given land constraints.

Without new burdens funding to carry out a review of the Councils Gypsy and Traveller needs assessment, there will not be the capacity to undertake this level of newly defined extensive assessment. The change in definition will require far more intensive work to assess.

4.17. Policy H17 Purpose-built student accommodation - Part Support / Part Object

Support a specific policy to address PBSA. The Council recognises the importance of student accommodation to support educational establishments, however we would expect these institutions to demonstrate how they have researched the local market to identify local accommodation and to evidence the need for new build. The London SHMA may have identified an overall strategic requirement for PBSA in London however as in previous London Plans it should be recognised there remains uncertainty over future growth in the London student population and its specialist accommodation needs. The work of the Mayor's Academic Forum has recognised for example it is unknown how the UK leaving the EU will affect London's student population. It should not be assumed for needs to have stayed the same, as needs can change within a short time period, and particularly in the university sector it is understood there appears to be levelling off in student numbers (except for the Russell Universities Group) due to changes in population and international flows. The HESA figures for institutions within this borough revealed in 2015/16 approximately a 5% drop in student numbers compared with 2014/15.

It is recognised that the strategic need is not broken down into borough level targets, however the concern that the policy lacks any recognition of priority local housing needs - where boroughs land supply is so constrained, it should be assessed within the overall context of borough SHMAs. Any student accommodation developed must be linked to an educational establishment so any application bought forward must meet very specific requirements – locally evidenced for local institutions and not at the expense of mainstream provision to meet identified housing needs. The requirement for strategic need to be addressed across London could otherwise create unsustainable travel patterns for example accommodation being built in parts of the borough on the basis it will support institutions in say central and east London. There should be further clarification in paragraph 4.17.3 as to how local needs will be assessed.

The Council supports the introduction of 35% affordable student rents in principle, however object to paragraph 4.17.13 as on large sites, where affordable housing provision could be accommodated alongside student housing, this restricts boroughs abilities to secure AH in accordance with local priority needs.

5. Chapter 5 Social Infrastructure

5.1. Policy S1 Developing London's social infrastructure – Support

Support the overall approach to social infrastructure and its protection through policies. However, would benefit from further clarify clarification about evidence base to ensure other forms of social infrastructure are explored, such as through realistic marketing. There is a need to ensure that public sector land disposals have regard to development plan policies; wider infrastructure investment beyond the borough cannot override local priorities.

5.2. Policy S2 Health and social care facilities

The Council supports the policy as it provides continuity from the previous London Plan. Under Section B of the policy we would recommend that development proposals should consider flexibility in context of design to facilitate new models of care which may emerge over time.

5.3. Policy S3 Education and childcare facilities – Part object

General concern about increase in housing population without a coherent strategy on increase in social infrastructure, including physical infrastructure particularly schools. Careful consideration should be given to assess whether such facilities should be located away from areas of high air pollution including busy roads. Air pollution has negative impacts on the health and wellbeing of children including lung development as well as onset of asthma. The Mayor cannot influence the Education and Skills Funding Agency's decisions.

The Council supports the added level of criteria to take into consideration for education development proposals. Support the requirement for local authorities to consider demand, and plan for need.

5.4. Policy S4 Play and informal recreation - Support

Support – overall approach to play and informal recreation closely reflects the approach taken in Richmond's Local Plan. The broadening of the definition to place greater emphasis on children's accessibility of play space mirrors the networked approach to access that the Council encourage.

The policy would benefit from greater clarity, however – phases such as "Development proposals for schemes that are likely to be used by children" is unclear, and could prove difficult to implement. Would for example, a dedicated indoor sports facility still be required to form and integral part of the surrounding neighbourhood or incorporate trees and/or other forms of greenery (e.g. Part B2d)?

Similarly, the policy would benefit from a clearer concept of 'incidental play' in order to support the delivery of this requirement (B4). While it is welcomed that the draft Plan recognises that 'play' is an activity that is not just confined to playgrounds and play areas, and can occur in a wide variety of locations and environments, it should be clear that this does not provide the opportunity for developers to avoid the provision of dedicated play space.

As per the comments by Public Health, the policy would benefit from consideration of mitigating air pollution and implementing road severance in the design of play space.

5.5. Policy S5 Sports and recreation facilities – Support

Support – the draft policy carries forward many of the requirements of the existing policy, and is generally aligned with LB Richmond's commitment to protecting and enhancing the borough's sports and recreational provision.

It could benefit, however, from a greater distinction between the provision of dedicated sports facilities and more informal recreational provision. The requirement to provide both formal and informal provision (para 5.5.1) is worthwhile and can be seen to introduce greater flexibility, while also mirroring the approach and requirements of LP 31. However, this should not enable opportunities for developments to forego the provision of dedicated sports facilities, where these are appropriate, that meet the standards required by the NGBs and Sport England (see, in particular para. 5.5.1: "Many activities require minimal facilities, and often an open space or community hall can be sufficient"). This should also be considered in light of Policy S4, on 'Play and informal recreation', which is targeted at young people's recreational opportunities.

The inclusion of specific provision shortfalls in para 5.5.2 (swimming pools, artificial grass pitches, sports halls) could become out of date and is not considered necessary, as the broader point that 'unmet demand is projected to increase' remains relevant even without these sport-specific references. The draft policy could be strengthened if reference were made to the availability of local and contemporary data in identifying shortfalls. I note, for example, that the current London Plan stated "Demand and supply for swimming pools will be broadly in balance London wide" – an aspect which has now been changed. More local specificity would improve this as a strategic policy.

5.6. Policy S6 Public toilets – Support

The principle of the policy is supported as there has been significant closures of accessible public toilets across London this has had detrimental impacts on the elderly, those with disabilities and parents with young children. However, the Council questions the strategic nature of this policy.

Provision of public toilets in 'large scale commercial development' is considered to be overly prescriptive. Richmond has successfully implemented a voluntary Community Toilet Scheme, and it is not necessary to set out planning requirements in a strategic plan for London. Ultimately, the provision of public toilets should be a matter for Local Authorities.

5.7. Policy S7 Burial space – Support

The proposed draft London Plan policies align with the protection afforded to cemeteries allocated as Green Belt, MOL, or OOLTI within LB Richmond.

The policy's additional requirement that new provision of cemeteries should account for broader green infrastructure and natural environment goals and/or requirements is welcomed.

6. Chapter 6 Economy

6.1. Policy E1 Offices – Support

The Council is supportive of Policy E1, noting in particular the impact of Permitted Development Rights and how this has led to significant supply issues for companies seeking space in this area which has historically been a source of affordable space.

There are potential implementation issues around the Policy's reliance on table 6.1 (Projected demand for Office Floorspace to 2041), which doesn't define this by borough, rather it just refers to Outer London @0.3-1.5 million sq.m. It is considered that this table could more accurately reflect requirements set out on a borough by borough basis relating to the need established within the London Office Policy Review 2017. It could become difficult to implement or an issue for discussion under Duty to Co-operate/Statement Of Common Ground (SOCG) requirements under proposed changes to NPPF. Further clarity is required as to how this will be agreed and taken forward in practice in order for the policy to be implementable

The development of a blended portfolio to include start-up/affordable/accessible space is an approach the Council supports in the light of much historic small scale stock being lost to Permitted Development Rights. The Plan's support for Councils to be able to introduce Article 4 protections in such areas is welcome. However the Council questions the significance of this policy given local authorities already have the power to introduce Article 4 directions. The Council has already introduced an Article 4 Direction to remove the permitted development rights for a change of use from offices to residential and has not relied on a Mayoral stance to justify.

The Council's emerging Local Plan supports and encourages the provision for start-up businesses and other SMEs within the borough through economic development providing managed and affordable workspace.

6.2. Policy E2 Low-cost business space - Neutral

Strong support for policy E2, which is consistent with Local Plan Policies LP40, 41 and 42. However, it is considered that it should incorporate flexibility for more stringent marketing requirements on a borough specific basis depending on local evidence.
Wording should be included at paragraph 6.2.6 which links the length of the marketing period to the discretion of each borough depending on local circumstances/evidence.

Given the supply issues generated by Permitted Development Rights, high relative residential values and other reasons, the Council welcomes the Plan's support to encourage a range of business space in terms of affordability and flexibility. We note that the market is responding to this in many ways but it remains important for Local Plans to

establish a strong policy position on this in order to meeting growing and changing business needs.

6.3. Policy E3 Affordable workspace – Support

Strong support for Policy E3 Affordable Workspace. This is to be welcomed within Richmond borough where there is a strong prevalence of SMEs and high demand for affordable workspace.

6.4. Policy E4 Land for industry, logistics and services to support London's economic function - Neutral

Support the provision, protection and/or suitable adaptation/intensification of industrial sites. However, the policy is not very helpful to those boroughs outside the Central Services Area.   There is no surplus industrial capacity in this borough. Intensification and co-location with residential is likely to lead to waste and industrial type uses being squeezed out by the higher value uses. We would seek removal of support for mixed-use or residential on industrial sites, except in exceptional circumstances.

The Council supports flexibility in types of activity permitted reflecting modern occupation of industrial buildings, including flexibility in how different uses – storage, workshops, offices, etc. – might be incorporated within a single building.   Research has shown that In Richmond upon Thames there are no designated industrial sites that should be released at the present time for other non-employment based uses. Research has confirmed that there is a considerable shortfall, and demand substantially exceeds supply. The Council supports the principle of no net loss of industrial floor space capacity including operational yard space.

6.5. Policy E5 Strategic Industrial Locations (SIL) – Neutral

There are no SILs in LB Richmond upon Thames.

6.6. Policy E6 Locally Significant Industrial Sites - Support

Support the continued approach to identifying Locally Significant Industrial Sites in Local Plans and the range of uses acceptable.

6.7. Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function – Object

In Richmond upon Thames, the continued demand for industrial premises, and the limitations on supply of industrial land, requires protection of smaller industrial areas and premises, including businesses located within railway arches or dotted among residential and mixed use areas.   The Council would prefer a local evidence based approach to be applied. The London Plan is too accommodating in paragraph 6.7.3 by allowing housing provision, outside designated SILs and LSIS where a mix of residential and industrial on the same site may occur. In spite of the Agent for Change principle, there is likely to be conflict between employment and residential uses and there is no suitable available land to which to relocate any affected business /operations. Mixed- use and residential development

should not be supported on existing industrial sites, except in exceptional cases and where they meet the criteria in D. and E.2 to E.4 of Policy E7.

6.8. Policy E8 Sector growth opportunities and clusters – Neutral

Supportive of the sector/clustering concept as a means of labelling development of key employment/industrial locations. This could perhaps be framed as an overall concept that can be applied to local areas rather than limited to the geographic locations or the Strategic Outer London Development Centre (SOLDC) concept as the chapter implies. For example, Richmond borough's cultural, creative, visitor, scientific and heritage offer is strong and its economic strength derives from its heritage and environmental quality. Harmful impacts of new development will need to be carefully balanced.

6.9. Policy E9 Retail, markets and hot food takeaways – Support/Neutral

Welcome reference to consolidating retail where there is a surplus in B. Continued recognition and support for markets is noted and welcomed.

Strong support for the principle of controlling hot food take-aways as the Council already has a similar policy.

6.10. Policy E10 Visitor infrastructure – Support

No comments.

6.11. Policy E11 Skills and opportunities for all - Support

General support for Policy E11, although some concerns are raised with regard to the implementation and monitoring of this policy, which could have significant resource implications for the boroughs.

The problem of short term projects versus longer-term commitment to the completion of apprenticeships seems fundamental and there would be merit in clarifying what is meant by 'completions' in this context. Apprenticeships are usually a single qualification based on a single period of learning and this proposition would support more modular apprenticeships which could be delivered by multiple employers, with the trainee addressing a range of core skills with different employers on different projects and still reach a completion.

The proposals are limited in scope, not recognising the increased influence the Mayor will have with devolution of the Adult Education Budget from 2019 and the joined up working that is happening with the Council and RHACC and Richmond upon Thames College in particular, and the sub-regional work.

7. Chapter 7 Heritage and Culture

7.1. Policy HC1 Heritage conservation and growth - Support

Welcome the recognition of the importance of the historic environment by keeping an evidence base. The Council has used its evidence base on heritage assets to inform the guidance in its Historic Environment SPD which is now adopted following public consultation.

7.2. Policy HC2 World Heritage Sites - Support

Richmond is partner borough in managing the Westminster World Heritage Site. Policy HC 2 is supported however, reference could be made to thee of 3D modelling to support protection of views which is set out in Policy D2 C and discussed in paragraph 7.2.3. The use of 3D modelling was a Recommendation No. 13 of the UNESCO mission report 2017.

7.3. Policy HC3 Strategic and Local Views – Support

Policy HC 3 is supported including a review of the London View Management Framework in HC 3 E.

7.4. Policy HC4 London View Management Framework – Support

General support for Policy HC 4. However, it will be necessary to ensure that the consultation area reflects the more extensive zone which has already impacted on the view from King Henry VIII's Mound to St Paul's Cathedral in future.

7.5. Policy HC5 Supporting London's culture and creative industries - Neutral

This sets the context to support and enhance arts, culture, sport and entertainment, the areas that contribute to the tourist and visitor economy which are important in the borough. London's Arcadia (the parks, gardens, historic buildings and landscape scenes covering the stretch of the Thames running from Teddington beneath Richmond Bridge to Kew) is recognised at paragraph 7.5.11.

7.6. Policy HC6 Supporting the night-time economy - Support

The recognition of the night time economy and some of the means of managing its impact is generally welcomed. However, the policy is mainly concerned with promotion of the night time economy and the Council considers that the possible negative impacts could be further addressed particularly where centres have a high residential population. Local Plan policies support the night-time economy, and particularly its diversification. However, the Local Plan also includes policies to limit certain uses classes where there are significant agglomerations in centres and the Council has introduced a Cumulative Impact Policy for Licensing in parts of Richmond and Twickenham.

7.7. Policy HC7 Protecting public houses - Support

The policy for protection of London's public houses is welcomed.

8. Chapter 8 Green Infrastructure and Natural Environment

8.1. Policy G1 Green infrastructure - Support

Welcome but to accord with the NPPF para 109 suggest the addition of 3) identify opportunities to provide biodiversity net gain through green infrastructure interventions.

8.2. Policy G2 London's Green Belt – Support

The Council welcomes the protection of green belt land. A thorough review of brownfield sites and unimplemented permissions should be the principal concern in addressing housing need rather than destroying the existing character and liveability of London, and

particularly its suburbs, by for example developing on backgarden land or putting increased pressure on land and open spaces that have been designated as being of local importance. Focus should be on understanding why homes are not built despite having planning permission and the Council urges the GLA to work with Sir Oliver Letwin to review and explain the gap between the high number of planning permissions being granted in London against those built. This comment relates to the Council's overall comment that it makes about the lack of infrastructure to accommodate growth and considers both areas should be reviewed to fit with the Mayors approach to 'good growth'.

8.3. Policy G3 Metropolitan Open Land – Object

The Council welcomes the protection of MOL. However, we would not support the principle of land swaps as this may weaken the policy. Designated MOL should meet the criteria and protect strategically important open spaces.

8.4. Policy G4 Local green and open space – Support

No comment

8.5. Policy G5 Urban greening - Neutral

Supportive, however the functionality of Urban Greening Factor would need to be trialled and assessed to see if it suitable for Richmond upon Thames. The wording in paragraph 8.5.1 is stronger than the policy wording. The policy wording should be strengthened to reflect this e.g. "G5A Major development proposals should ensure GI is integral to site planning and building design as it is fundamental to the greening of London. This can be achieved by incorporating measures such as high-quality landscaping (including trees), living roofs, living walls and nature-based sustainable drainage."

The Mayor recommends a target score of 0.4 for predominantly residential developments and 0.3 for commercial developments. The greening of new development is to be welcomed and this Council has policy to incorporate new biodiversity features into new and/or redevelopments where possible. There is a concern that a generic model will not take account of local circumstances and could impact on the viability of commercial developments in particular?

8.6. Policy G6 Biodiversity and access to nature - Neutral

The Council is concerned that Policy G6 is weaker than current Local Plan Policy LP15 and wording. It is also considered that the wording would benefit from including text on management and maintenance in perpetuity.

Regarding paragraph 8.6.3, corridors include Green, blue and dark and should also refer to creating/enhancing/protecting corridors between sites to help movement of species and genetic diversity of populations. Dark corridors are important for bats and these should be identified and protected. Explicit reference should be made to "cumulative impacts" on sites of biodiversity and nature conservation importance. Biodiversity, including the wider ecological and green infrastructure networks, play a crucial role in adapting to the effects of climate change.

8.7. Policy G7 Trees and woodlands - Support

The Council supports the protection, replacement and planting of trees. Trees and other landscape features can help areas to adapt to the likely effects of climate change: such as their cooling and shading effects; and reducing surface water runoff rates and flash flooding during heavy rainfall through absorption and infiltration.

8.8. Policy G8 Food growing – Support

Food growing is both good for the environment, mental health and education (e.g. teaching children about how food is produced as well as healthy eating. As a consequence it is important that existing allotments are protected and expanded as well as ensure that there are opportunities for community gardens in new developments.
Policy G8A does not make a distinction between community food growing spaces and allotments. These are different things and come with different long term security over their tenure and purpose. This distinction should be further considered and wording changed if necessary. Para 8.8.2 needs to draw a clearer distinction / better define a green roof for food growing as distinct from a living roof for biodiversity.

In the Richmond context of limited land availability, provision of space for food growing is likely to be led through the protection of existing allotments and private amenity space. The Council is working through Public Health with other agencies to support sustainable food initiatives. Beyond planning, there are other initiatives such as the Food Growing Schools London Project which schools in the borough participate in, and the policy could recognise this will be met through partnership working.

8.9. Policy G9 Geodiversity – Support

No comment

9. Chapter 9 Sustainable Infrastructure

9.1. Policy SI1 Improving air quality – Support

The Council supports the draft policy. The whole borough is a AQMA and there are several AQFAs. Air pollution is of significant concern for health and wellbeing for all Londoners particularly for those who are more vulnerable; this includes children, the elderly and those with illness such as asthma and Chronic Obstructive Pulmonary Disease.

The Mayor should be mindful that policy SI1 A6 may throw a large responsibility back on the Council to demonstrate "equivalent air quality benefits". If the developer can't deliver emissions reductions on site, some other AQ benefits will be required off site. In reality this will usually mean that the LA will be required to provide equivalent AQ benefits nearby through S106. This sets the bar very/unnecessarily high, may be unachievable and may result in S106 being repaid to the developer if challenged. The Mayor should consider revising the wording deleting "equivalent" to read: 6) Development proposals should ensure that where emissions need to be reduced, this is done on-site. Where it can be demonstrated that on-site provision is impractical or inappropriate, off-site measures to improve local air quality may be acceptable, provided that air quality benefits can be

demonstrated. This will permit the Local Authority to provide useful Air Quality benefits without the threat of any monies having to be repaid.

Para 9.1.2 - The Council applauds the Mayors intention to "ensure that new developments are designed and built, as far as is possible, to improve local air quality and reduce the extent to which the public are exposed to poor air quality. This means that new developments, as a minimum, must not cause new exceedances of legal air quality standards, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits". This is an admirable intention but is difficult to implement in practice. It will be difficult, unless in an AQFA, to require that emissions from buildings are reduced to zero; it will be even more challenging to not "delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits " as this is generally the local road network. Unless the new development is car free, (and sometimes even if it is), major developments will almost always add to local transport emissions and thereby add to local NO2 exceedances.

Achieving car free developments for family accommodation in outer London is still considered unacceptable to developers and unrealistic by the Council (further comments on this issue are in the response to chapter 10. A good example in LBRuT is the Stag Brewery which will add around 850 new residents, 1,200 pupils, a health centre, retail etc. to a road network which already exceeds capacity. The Council believes this policy should stand, but the Mayor should be mindful of its limitations.

9.2. Policy SI2 Minimising greenhouse gas emissions & Policy SI3 Energy infrastructure – Support
The Council supports Policies SI2 and SI3 which are in accordance with the Council's Local Plan Policy LP22.

9.3. Policy SI4 Managing heat risk – Support
The Council supports the draft policy. The Local Plan contains policy to encourage development and adaptation resilient to future impacts of climate change in order to minimise vulnerability of people and property.

9.4. Policy SI5 Water infrastructure – Support
The Council supports Policy SI5 which is in accordance with the Council's Local Plan.

9.5. Policy SI6 Digital connectivity infrastructure – Neutral
This is of relevance to the borough as a business location. However, it is unclear what this policy will achieve in practice. It would like current Building Regs to be exceeded but offers no basis for actually implementing this. Achieving this objective will require industry rather than the planning system to implement and there should be more on what the Mayor will do to align Plan exhortations and delivery.

There is concern that the policy may have adverse impacts on the viability of new employment and community developments in the future.

9.6. Policy SI7 Reducing waste and supporting the circular economy & Policy SI10 Aggregates – Support/Neutral

Support the circular economy and waste reduction measures. Point 3 regarding the target of zero biodegradable or recyclable waste to landfill by 2026 should be qualified & clarified. Presumably this applies to all waste, not just household or local authority collected waste. How is "recyclable waste" defined? Does "zero" really mean "none whatsoever"? How would this be applied and enforced? How would any of London's Waste Collection Authorities (WCA's) still relying on landfill for residual waste, establish whether it contains any biodegradable or recyclable waste? In practice this could amount to the same thing as a complete ban on landfill for household and similar wastes as there is always likely to be at least some bio or recyclable waste remaining within it. There would always need to be a contingency permitted to deal with events such as plant/incinerator breakdown.

Regarding criteria 4a there is a risk that the Mayor may seek to amend proposed borough contracts if he thinks they are not in conformity with the 65% recycling target by 2030. This could potentially increase contract costs. 65% recycling of household waste would be very difficult to achieve in London. (Previous target was 60% by 2031).

It isn't clear how much each borough would be expected to contribute towards the achievement of this target but it could be expected to increase external to reduce the frequency of residual waste collections, to switch to small capacity wheeled bins for low-rise refuse and to introduce separate food waste collections for high-rise. Improved regulation of commercial waste management to improve compliance with pre-treatment, waste hierarchy & rules against mixing hazardous & non-hazardous wastes has the potential to greatly improve recycling rates achieved for other similar wastes.

Regarding criteria 4b WCA's have no duty to collect construction, demolition and excavation waste but the Council collects some via fly-tip clearance & some via the chargeable DIY waste service; as we deal with such a small part of the overall tonnage I doubt this target would really affect the Councils directly. However rules relating to charging for DIY waste might need clarification in order that it is clear that the disposal of such waste is chargeable.

Design criteria 5 is supported in principle with the possible exception of separate food waste storage provision in high-rise as the consistency agenda only goes as far as extending this to all low-rise. The plan could perhaps push high-rise to having food waste macerators instead (subject to water company support) which could result in significant disposal savings. The understanding is that this policy could have a real impact on the determination of planning decisions and therefore on developers' willingness to propose adequate arrangements. This may need to link to the consistency agenda so that developments are designed to cope with likely future collection service configurations. There are many new residential units that are very limited in terms of space and therefore

the pressure to build in space for recycling may conflict directly with pressure to accommodate more living units.

Criteria B1 aiming for zero waste is not consistent with the 95% target stated in 4B for demolition waste.

In Criteria B3, opportunities for managing as much waste as possible on site Food waste macerators could be encouraged as could home composting provision in gardens and small scale Anaerobic Digestion in larger developments to deal with food waste on site.

Criteria B4 on adequate recycling storage space is supported but it should also recognise storage for general waste collection.

Regarding criteria B5, clarification is sought on whether this requirement is for the project from conception and thereafter throughout it operational life. Both are important however the longer term servicing requirements will have the most impact for the Council.

9.7. Policy SI8 Waste capacity and net waste self-sufficiency & Policy SI9 Safeguarded waste sites – Neutral /Support
The outer London Boroughs have the greatest increase in waste apportionment i.e. in the West London Waste area it is an extra 700,000 tonnes but the outer areas have also to find the greatest number of new homes. This Borough already has a shortage of industrial land, so there is a tension in identifying space for new or intensifying waste uses on industrial land.

The Council is currently part of the West London Waste Authority boroughs that plan for the waste authority area's waste apportionment, and welcomes the positive wording as set out in criteria B2.

Richmond Borough strongly supports safeguarding waste sites. The pressure for redevelopment on waste sites can lead to the running down of existing operations e.g. Arlington Works, in the Borough. The Council suggests that the policy text in para. 9.9.2 is reworded to "assess the maximum throughput achieved over at least three active years" to counteract the lessening of throughput from those seeking to make a case for cessation of waste activities on site.

9.8. Policy SI11 Hydraulic fracturing (Fracking) – Support
No comment

9.9. Policy SI12 Flood risk management & Policy SI13 Sustainable drainage – Support
The Council supports the principles of the policy and the Drainage Hierarchy which are broadly in line with the Council's own Flood Risk and Sustainable Drainage Policy, LP21. However funding would be welcome to update surface water management plans in collaboration with neighbouring boroughs.

9.10. Policy SI14 Waterways – strategic role – Part Support/part object

Agree that the waterways are multifunctional assets. The Council continues to liaise with the Marine Management Organisation in the drafting of its Local Plan Policies. The council will continue to work with the relevant river agencies, PLA and EA, and support the Thames Strategies for the various reaches within the Borough.

Richmond objects to the paragraph 9.14.8, as the whole of the River Thames within the Borough is designated as MOL. This paragraph may apply to potential new designations but the Council would not wish this existing MOL designation within the borough to be weakened or under threat. We would prefer wording to make it clear that existing river MOL should remain so. In this borough the Thames meanders through a connected landscape of parks, palaces and small towns known as the Arcadian Thames. Thames Strategy Hampton –Kew is in place. Of the seven main bends in the river, 6 are dominated by open spaces associated with local palaces and villas. The bends, islands and open green spaces help define the distinct village communities along both banks of the river. There are numerous views, vistas, landmarks and historic landscapes along the river and it is an important component of the Borough's green infrastructure network providing opportunities for recreation and linkages for biodiversity and habitat of ecological importance. This part of the Thames is less suited to transport infrastructure related uses but is appropriate to be protected as a strategically important permanently open space within the built environment.

9.11. Policy SI15 Water transport – Neutral

The Council is strongly supportive of the stance that boatyards should be protected. However, increased freight, wharves and passenger transport may not be appropriate along the Arcadian Thames, which should be protected as a strategically important permanently open space within the built environment.

9.12. Policy SI16 Waterways – use and enjoyment - Object

The main aim of the Council is to ensure that the river is accessible to all, for pleasure and recreation as well as navigational purposes, and as such, of wider benefit to the community and residents that it serves. The Council supports the Policy point A. The Council would suggest that extra criteria be added so that river-related and river dependent industrial and business uses be more strongly protected. River-related industrial and business uses, especially those supporting river dependent uses involving the construction, repair, sale and servicing of river craft, make a vital contribution to the continuation of the historic tradition and function of the River Thames for transportation, communication and recreation and play a role in the local economy. Boat builders, boat yards, and chandlers are under potential threat from development for luxury riverside homes.

Object - the Council seeks to protect the character, openness and views of the Arcadian Thames from unauthorised moorings and would not support D. and E. the provision of new moorings. Whilst it is acknowledged that existing houseboats, moorings and other floating structures are an established part of the river scene, without restriction there would be a concern that there could be an increase in planning applications for residential and private

permanent moorings. The Local Plan policy is in conformity with existing London Plan Blue Ribbon Network policies 7.24 - 7.30, in particular Policy 7.27 point c., which states that proposals should protect and enhance waterway support infrastructure such as boatyards, moorings, jetties and safety equipment etc. It also states that new mooring facilities should normally be off line from main navigation routes, i.e. in basins or docks. The supporting text goes on to say consents for and the use of new moorings should be managed in a way that respects the character of the waterways and the needs of its users. Importantly, it also states that the rivers should not be used as an extension of the developable land in London nor should parts of it be a continuous line of moored craft. We would not wish for this policy to be dropped in the new London Plan. The Council has in place a Local Byelaw (2015) (see www.richmond.gov.uk/byelaws_and_local_legislation for further information) whereby it is a criminal offence to moor for longer than permitted without the written consent of the Council.

Object - The character of the reaches in central London is more suited to water freight and transport

9.13. Policy SI17 Protecting London's waterways – Support

River Thames runs for 34 km through the Borough. This borough is the only 1 in London that is intersected by the Thames, giving long river recreational areas, and a unique and historic landscape character.

10. Chapter 10 Transport

10.1. Policy T1 Strategic approach to transport – Support/neutral

T1 A1: Qualified support; the direction of travel is laudable but there does not appear to be enough tangible action/investment in the draft Mayors Transport Strategy (MTS) to achieve this level of mode share for walking, cycling and public transport.
T1 A2: neutral. Table 10.1 includes numerous vague and unfunded schemes. It may be simpler just to say that Development Plans and development proposals should support the delivery of the MTS. Alternatively, Table 10.1 should be restricted to a list of specific proposals rather than including many broad-brush descriptions of schemes. If Table 10.1 is retained it should include more schemes of benefit to Richmond, as otherwise T1 A2 would be meaningless in this borough.

T1 B: Support with modification. This is a continuation of existing land use policies, but ideally there should be a reference to capacity as well as connectivity and accessibility. Some locations are well connected and accessible but there is not sufficient capacity to allow for more trips. Para 10.3.2 seems to acknowledge the capacity issue so it should be mentioned in the policy.

In general, given the plan is intended to cover the period to 2041, there is little on the potential impact of new technologies including autonomous or semi-autonomous vehicles for private, shared or freight uses. The plan should consider these issues.

10.2. Policy T2 Healthy Streets – Support

Support, the policy is largely the same as previous about encouraging sustainable transport. It would be useful to define the "essential" vehicles mentioned in T2 B2

Healthy Streets is critical to ensure that people enjoy their environment and are active within it. It also benefits people in terms of health and wellbeing.

10.3. Policy T3 Transport capacity, connectivity and safeguarding – Support
Support, with modifications as follows:

T3 C states that "Development proposals that do not provide adequate protection for the schemes outlined in Table 10.1… should be refused". Given that Table 10.1 is an unfunded wish list, with many elements not even pro-actively led by the Mayor in the draft MTS (e.g. workplace parking levies), this requirement seems too strong. The policy would be acceptable without this section, i.e. "Development proposals that seek to remove vital transport functions or prevent necessary expansion of these, without suitable alternative provision being made to the satisfaction of transport authorities and service providers, should be refused. "Local authorities" should also be added to the final sentence.

T3 D talks of prioritising several TfL-promoted transport schemes in development plans and decisions, but some upgrades outsides the Mayor's remit (e.g. non-TfL rail) should also be prioritised. This should be explicit in the policy.

10.4. Policy T4 Assessing and mitigating transport impacts - Support
Essentially a continuation of existing policy.

10.5. Policy T5 Cycling – Support with modifications
Generally support with modifications as follows:

T5 B and C offer developers an easy way out of meeting their obligations on site, with the result that space would be required from local authorities, potentially to the detriment of other road users. Developments that are served only by off-site cycle parking are also less likely to succeed in getting people to cycle to/from the development. It would be better for off-site cycle parking to be a last resort and only in exceptional circumstances.

Would like to see much stronger evidence to justify the increase in minimum cycle parking standards for short stay (class A uses) and long stay (office use) described in para 10.5.3. The doubling of provision from the existing London Plan appears to be based on cycle mode share to destinations in selected boroughs (including Richmond) being more than double that elsewhere in London; but there does not appear to be evidence showing whether the existing London Plan standards for cycle parking are currently inadequate in these boroughs, i.e. is cycle parking at capacity given current standards? Without this evidence it may be that this policy leads to space being given to cycle parking that is not actually needed and will not be used. In combination with T5 B and C (above) as written, this may lead to pressure on local authority land/highway space, to the detriment of other road users.

10.6. Policy T6 Car parking 6.1 – Object

Strongly Object to Policy T6.1 as it is considered to be a blanket led approach that does not allow for any interpretation of the borough specific local circumstances. This Policy could have adverse implications for the borough with particular regard to areas which fall within PTAL Level s 2-4, where demand for kerbside space is high but parking controls are not in place.

The Council has provided evidence to the inspector for its Local Plan inquiry supporting the use of minimum parking standards in the borough for lower PTAL areas. In these locations, it is unrealistic to expect car-free or low-car housing. This evidence, produced by transport consultant AECOM, is appended to this response to support the case for continued use of minimum parking standards in the borough. The document can also be accessed on our website: http://www.richmond.gov.uk/media/14420/ldf_parking_standards_research.pdf

A consequence of policy T6.1 as written is that it would increase the risk of off-street parking for residential development in outer London boroughs being inadequate to cater for parking demand. This would lead to overspill parking on-street in areas which are not covered by controlled parking zones (which is the case for much of outer London, including much of Richmond). Additional vehicles being parked on-street runs counter to the Mayor's concept of turning residential areas into "Healthy Streets" as envisaged under the draft Mayor's Transport Strategy. In reality a PTAL in Outer London can mean significantly different travel choices to that in inner London and there is also a discrepancy between stations.

Without a step-change in the provision of other transport options in Richmond – none of which is suggested by the proposals in Table 10.1 - the maximum parking standards suggested by Table 10.3 would inevitably lead to overspill parking outside CPZs. This policy is therefore opposed.

Maximum residential car parking standards are in some cases contradictory, e.g. according to Table 10.3 all residential development in PTAL 5-6 must be car free; yet at the same time all residential developments must provide car parking spaces for disabled people (Policy T6.1 G) which counts towards the maximum parking provision for the development (Policy T6.1 H4). This can't happen if the development is car free. This contradiction needs to be addressed.

10.7. Policy T6.2 Office parking – Support

General support as consistent with Local Plan approach

10.8. Policy T6.3 Retail parking – Support

General support for Policy T6.3. However, it is considered that Table 10.5 could more usefully read "Outer London Retail above 500sqm up to 1 space per 50 sq.m gia", for clarification purposes as the current wording is not consistent.

10.9. Policy T6.4 Hotel and leisure uses parking – Support

General support for Policy T6.4, although it is considered to be inflexible with regard to PTAL 4 areas.

10.10. Policy T6.5 Non-residential disabled persons parking - Support
General support for Policy T6.5

10.11. Policy T7 Freight and servicing – support
The Council generally supports Policy T7.There are no new issues/challenges arising from Policy T7. Part E of Local Plan Policy LP 44 and paragraph 11.1.10 are consistent.

10.12. Policy T8 Aviation
The Council supports Policy T8 – the Council strongly opposes any further expansion at Heathrow airport. The Community Plan 2016-2020, recognises that aircraft noise is a very significant issue for many residents, having an impact on quality of life, health and education. Night flights are particularly intrusive. The Council is leading the local resistance to proposals to expand Heathrow airport and would like to see a permanent block on any expansion. The Council will oppose any expansion of Heathrow Airport and any changes to the existing arrangements which will have an adverse impact on the borough.

The Council would like to see the word "strongly" carried forward from existing London Plan Policy 6.6 into Policy T8.

10.13. Policy T9 Funding transport infrastructure through planning –Support/Neutral.
The Council is generally supportive of Policy T9. It is basically a continuation of existing policy, with a new emphasis on funding Crossrail 2 which is supported by this borough. However, we would suggest that it should be better considered in light of the housing growth policies. The Council requests that further work is carried out on a detailed infrastructure plan if it is to realistically achieve growth targets.

The Council does have concerns about the application of MCIL2 and comments have been made separately to the consultation on the draft Charging Schedule.

The Council continues to strongly object to the Mayor's proposals for MCIL2 as the evidence base presented by the Mayor does not meet Examination requirements. Mayoral CIL is not negotiable and has the potential to increase viability risk on some developments and cumulatively divert developer contributions away from local infrastructure provision, including affordable housing. It is therefore essential that the Mayor considers local variations in viability, rather than retaining his current broad brush approach and introducing differential charging without due consideration of site specific development viability on sites across London.

11. **Chapter 11 Funding the London Plan**
    11.1. **Policy DF1 Delivery of the Plan and Planning Obligations - Neutral**
    The Council has already responded to the Mayors Homes for Londoner's Affordable Housing and viability SPG consultation. Since then the Council is still concerned with the potential unknown quantum of affordable housing proposed where an applicant aims to use the Mayors fast track approach and would therefore not require a viability appraisal for above 35%. The Council require any scheme delivering less than 50% affordable homes to submit a viability appraisal to support the quantum of affordable housing being proposed. It is unclear from the SPG how a council would know whether a scheme providing 35% affordable housing that was policy compliant could in fact deliver more than 35% affordable housing, as there will be no requirement for an applicant to provide a viability appraisal with such an offer.

    Furthermore it is not clear how a council would be able to test the viability of providing other planning obligations as well as affordable housing. As at present 35% affordable housing is rarely achieved as is evidenced for London by the Mayor's AMR, In reality if negotiations seek to secure other planning obligations such as education or community facilities, the affordable housing offer is reduced below 35% and the overall viability of planning obligations sought by the council can be tested. Related to this point, the emerging Local Plan policy approach requires an increase in industrial land on site but the increased level of affordable housing required in industrial areas may pressurise the design of a site and undermine the an overall design of a scheme as competing policy requirements are balanced. This approach causes uncertainty and the Council seeks clarification of how competing policy requirements are balanced in redesignated industrial areas.

12. **Chapter 12 Monitoring**
    12.1. **Policy M1 Monitoring – Neutral**
    The Council suggests monitoring net increases in both office and industrial land in accordance with Policies E5, E6 and E7 which aim to intensify employment uses.

Summary

The greatest threat to the London Plan delivering against its ambitions for Good Growth is that there are not the resources available to make delivery achievable.

Some of this is scarcity of available land which will create major challenges in identifying locations of the 5 year land supply, not just for housing but for the schools, healthcare provision and transport infrastructure these new homes will need. If the 5 year land supply is quickly exhausted, then councils will need to manage a substantial number of appeals.

The Council and the SLP welcome the focus in the London Plan on the importance of local engagement and inclusivity, but this poses a particular challenge given the decision to produce a document that is often quite prescriptive. Policy is proposed on a range of non-strategic subjects from public toilets to takeaway food outlets to water fountains. This interferes with the ability of councils and communities to find local solutions that truly engage existing residents and allow them

to feel that they have been able to influence plans. A prescriptive tone reduces the credibility of planners, whether at GLA or council level, when they insist that residents are included in decisions. The Council and the SLP propose that the level of prescription across the plan is scaled back to allow greater scope to deliver its aims around inclusivity and engagement.

Beyond councils we are concerned that the London Plan does not address the fact that these homes need to be delivered at a point where TfL need to make substantial savings. This makes delivering the transport infrastructure required very challenging and the London Plan does not currently adequately address this. Nor is there sufficient funding to deliver the numbers of affordable homes that are needed. We hope the GLA will work with central government to address this.

There is also a very serious concern about whether there will be a large enough construction workforce to deliver the ambitions of the London Plan. Over a third of London's construction workforce is from other countries in the EU and only a very small percentage of them would have been able to work here without freedom of movement. At a point when we should be looking to increase our workforce we risk losing a very significant proportion of it. The London Plan will need to plan for a scenario where the resources are not available due to Central Government decisions on leaving the EU.

We believe that there is much in the London Plan that can help deliver the vision we share with the Mayor for a more polycentric London. We acknowledge that London is going to need to change in the next 20 years and that our major Outer London town centres will be the focus of much of that change. However, the issues we have raised provide real concerns about the ability to deliver that change in a way that meets the plans for good growth taking into account the character of the surrounding area.

We look forward to working with you to help address those concerns.