

# Local Plan

As adopted by Council 3 July 2018

Publication Local Plan incorporating Inspector's Final 'Main Modifications' as published May 2018 and ['List of Council's Additional Modifications to Local Plan Publication version'](#) as published December 2017; subject to additional minor modifications to the Plan to cover any necessary updates on adoption.

July 2018

# Foreword by the Cabinet Member for Environment, Planning and Sustainability – *to be added*

## 1 Introduction

### 1.1 Setting the Scene

1.1.1 The Council's Local Plan will set out policies and guidance for the development of the borough over the next 15 years. It looks ahead to 2033 and identifies where the main developments will take place, and how places within the borough will change, or be protected from change, over that period.

1.1.2 The Council's Local Plan forms part of the development plan for the borough. It has to go through an Examination in Public by an independent Government inspector before it can be adopted by the Council. The London Plan, prepared by the Mayor of London, also forms part of the development plan, and the Council's Local Plan has to be in general conformity with it.

1.1.3 The role of the development plan is to guide decision making on planning applications and inform investment in social and physical infrastructure. When planning applications are received, they are assessed against the development plan to see whether planning permission should be granted or not. The Planning and Compulsory Purchase Act 2004 requires that “in making any determination under the planning acts, regard is to be had to the development plan; the determination shall be made in accordance with the plan unless material consideration indicates otherwise”.

1.1.4 The policies as set out in this Local Plan follow the approach of the presumption in favour of sustainable development and show how it is expressed locally. The Council will ensure that planning applications that accord with policies in the adopted Local Plan and the London Plan (and where relevant, with policies in emerging neighbourhood plans, such as the Ham and Petersham Neighbourhood Plan once adopted) will be approved without delay, unless material considerations indicate otherwise.

1.1.5 The Local Plan is prepared within a hierarchical framework of planning policy for England. At the top of the hierarchy are the various Planning Acts, the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). Legislation requires that local authorities must take the NPPF into account when preparing their Local Plan. This means in practical terms that the Council should follow the guidance in national policy unless there is local evidence and circumstances that would justify a different approach.

1.1.6 Below national policy sits the London Plan, which is prepared by the Mayor of London. Legislation requires the Local Plan to be in ‘general conformity’ with the London Plan. This means that the Local Plan should be in line with the London Plan, unless there is local evidence and circumstances that would justify a different approach. The London Plan forms part of the development plan for the borough and provides the spatial development strategy for Greater London.

1.1.7 This Local Plan has been produced in line with the existing Planning Acts, national policy and guidance, including the NPPF and PPG, and the London Plan (including the 2015-16 Minor Alterations). In addition, other legislation, such as the Town and Country Planning General Permitted Development (Amendment) Order 2016, has been referred to. It is acknowledged that during the lifetime of this Plan, national policies, guidance and other legislation as well as a new London Plan will be published. Where this

Plan refers to publications that are subsequently superseded by updated policies, guidance or changes to legislation, the updated context will be regarded as material considerations.

## 1.2 Existing Local Plan

1.2.1 The existing Local Plan for the London Borough of Richmond upon Thames sets out how and where development in the borough will be delivered in the future and is currently made up of a series of documents, as shown in the table below. All existing Local Plan documents are available to view on the [Council's website](http://www.richmond.gov.uk/local_plan) at: [www.richmond.gov.uk/local\\_plan](http://www.richmond.gov.uk/local_plan).

Plan	Function	Status
Core Strategy	Vision and strategic policies	Adopted in April 2009
Development Management Plan	Detailed policies for the management of development	Adopted in November 2011
Twickenham Area Action Plan	Policies and proposals for central Twickenham	Adopted in July 2013
Joint West London Waste Plan	Planning for waste	Adopted in July 2015
Saved Unitary Development Plan	Saved site-specific proposals	Adopted in March 2005

1.2.2 The Core Strategy outlines the Vision and Spatial Strategy for the borough and includes 20 core planning policies on matters including climate change, housing, employment and retailing. It provides the framework for the development of other Development Plan Documents (DPDs) within the Local Plan.

1.2.3 The Development Management Plan (DMP) builds on the objectives and principles of the Core Strategy and includes more detailed policies for the management of development. The DMP was adopted in November 2011.

1.2.4 The Council adopted the Area Action Plan (AAP) for Twickenham centre in 2013, which sets out detailed policies and proposals for Twickenham centre. The NPPF was fully taken into account during the development of the AAP, and due to its relatively recent adoption, the AAP will not be reviewed or amended as part of this Local Plan.

1.2.5 The six west London Boroughs (Brent, Ealing, Harrow, Hounslow, Hillingdon and Richmond upon Thames) and latterly the Old Oak and Park Royal Development Corporation, have jointly prepared the West London Waste Plan (WLWP). It sets out a strategy for the sustainable management of waste and also allocates sites for managing West London's waste over the period up to 2031.

1.2.6 The saved Unitary Development Plan has been largely replaced by the Local Plan (i.e. the Core Strategy, DMP and WLWP). The only parts of the UDP that remain saved and have not been superseded are the site-specific Proposals.

1.2.7 The Council commenced work on a Site Allocations Plan in December 2012 with a 'Call for Sites' consultation. Pre-publication consultations were undertaken in 2013 and 2014. The Council has decided not to pursue a separate Site Allocations DPD but rather take forward site-specific allocations alongside the review of the existing policies, and these have been incorporated into this Local Plan.

1.2.8 The Borough Community Infrastructure Levy (CIL), although not a formal DPD, is of relevance to the Local Plan as it sets out the Council's rates of CIL that apply to certain types of development in the borough.

## 1.3 Preparing the Local Plan

1.3.1 Between 4 January and 1 February 2016, the Council undertook a consultation on the rationale and scope for the review of the Core Strategy and DMP policies as well as the proposed sites to be allocated for development. This was an additional stage of consultation by the Council (not prescribed by the Town and

Country Planning (Local Planning) (England) Regulations 2012) to provide the opportunity for early engagement with interested parties, including Duty to Cooperate bodies.

1.3.2 As part of the early consultation, the Council prepared an assessment of each existing planning policy of the Core Strategy and DMP against relevant national and regional policies and guidance, as well as local evidence and identified needs. This was used to indicate whether there was a need to review the policy and what that scope of the review might involve.

1.3.3 The Council received 80 responses to the scoping consultation. All responses have been analysed and considered as part of the preparation of this Pre-Publication version of the Local Plan. A record of all responses submitted including a full analysis of the consultation responses are available on the Council's website at: [www.richmond.gov.uk/local\\_plan\\_review.htm](http://www.richmond.gov.uk/local_plan_review.htm).

1.3.4 Public consultation on the Pre-Publication version of the Plan took place from 8 July until 19 August 2016 in line with Regulation 18 of the Local Planning Regulations and the Council's Statement of Community Involvement. The Council received 101 responses to the public consultation on the first draft of the Local Plan. All responses have been analysed and duly considered as part of the preparation of the final version of the Local Plan. A record of all responses submitted including a full analysis of the consultation responses are available on the Council's website at: [www.richmond.gov.uk/local\\_plan\\_review.htm](http://www.richmond.gov.uk/local_plan_review.htm).

1.3.5 The indicative timetable for the Local Plan Review is set out in the table below.

What	When
Consultation on scope of review of policies and draft site allocations	4 January - 1 February 2016 (completed)
First consultation on the draft Local Plan ('Pre-Publication')	8 July - 19 August 2016
Second consultation on the draft Local Plan ('Publication') that the Council intends to submit to Secretary of State	Winter 2017 (current stage)
Submission of the draft Local Plan to the Secretary of State	Late Spring/Summer 2017
Independent Examination in Public	Autumn/Winter 2017/18
Adoption of the Local Plan	Spring 2018

## 1.4 Consultation on this Plan and associated Documents

1.4.1 The following documents, which are available on the [Council's website](http://www.richmond.gov.uk/local_plan_review) at [www.richmond.gov.uk/local\\_plan\\_review](http://www.richmond.gov.uk/local_plan_review), are all being consulted on at this stage:

1. Publication Local Plan (this document): this sets out the Council's final version of the planning policies. The policies have been grouped into related policy areas such as Local Character and Design, Housing, Transport. In addition, this document sets out the site allocations that are considered central to the delivery of the strategic policies and the Spatial Strategy.
2. Sustainability Appraisal of the Publication Local Plan: this sets out how the economic, environmental and social effects that may arise from the Local Plan (for both the policies and the site allocations) have been assessed and taken account of. It also sets out what difference the Sustainability Appraisal and its process has made to the final version of the Council's Local Plan.
3. Policies Map changes: this sets out the changes to be made to the accompanying Policies Map. The existing Policies Map (2015) and its designations will be retained unless indicated otherwise within this document. In addition, the site-specific allocations as set out within this Plan will also be incorporated into the Council's final version of the Policies Map.

1.4.2 The following supporting documents and background papers, which are available on the [Council's website](http://www.richmond.gov.uk) at [www.richmond.gov.uk/local\\_plan\\_review](http://www.richmond.gov.uk/local_plan_review), are also made available alongside the main consultation documents:

- Equalities Impact Assessment: this sets out the assessment against nine protected equalities characteristics. The assessment has been undertaken to ensure that any potential equalities consequences of the policies and site allocations have been considered and, where possible, eliminated or minimised so that opportunities for promoting equality and diversity are maximised.
- Health Impact Assessment: this sets out the findings of the assessment of the health and wellbeing impacts of the policies.
- Detailed review of existing policies: this sets out the detailed analysis and assessment of the existing planning policies against national and regional guidance, local evidence and need, together with the original rationale and scope for the review of the policies. This document was first produced for the public consultation in early 2016 on the scope and rationale for the Local Plan Review. It has been kept up-to-date with regard to the assessment against national and regional guidance as well as local evidence and need to take account of any recent changes to the national planning policies and emerging/published local evidence studies.
- Updated local evidence, including the Strategic Housing Market Assessment (SHMA), which has been used to inform the policy approaches on Housing and Affordable Housing. Other relevant Local Plan evidence is published on the Council's website at: [www.richmond.gov.uk/local\\_development\\_framework\\_research.htm](http://www.richmond.gov.uk/local_development_framework_research.htm)

## 2 Strategic Context, Vision and Objectives

### 2.1 Strategic Context

#### The London Borough of Richmond upon Thames Local Plan 2018 - 2033

2.1.1 Our Local Plan sets out the strategic planning framework for the borough for the next 15 years. The Local Plan contains the strategic vision and objectives for the borough as well as the policies and site allocations that will guide the future development of the borough.

2.1.2 The Local Plan takes account of other plans and strategies, and it is the main delivery mechanism for the spatial elements of the borough's Community Plan and the Council's Corporate Plan.

#### The Community Plan 2016 - 2020

2.1.3 The Community Plan sets out The Richmond Partnership's vision for the borough and describes how the Council and its partners will engage and involve the local community.

2.1.4 The overall vision, as set out in the Community Plan, is for a borough where:

- people will lead happy lives and are able to enjoy life, with opportunities to learn, develop and fulfil their potential;
- people can live as independently as possible in the local community and feel empowered to take responsibility for their health and wellbeing, and plan for their future;
- people feel safe, are respected and valued, and able to contribute to their communities and where diversity is celebrated;
- the local character of the environment is protected and new development is high quality and compatible with local character, meets people's needs and provides opportunities for all; and
- our towns and local centres are attractive, viable for businesses and contribute positively to the quality of life for residents and visitors.

2.1.5 The Community Plan is based around three themes:

- 1 Involving and engaging local people and businesses
- 2 Delivering cost effective services to meet local needs
- 3 Being accountable to local people

2.1.6 For each theme, the Partnership has identified a set of priorities, which are designed to help to achieve the Partnership's vision for the communities of this borough. The Plan sets out the vision for a vibrant and sustainable community and voluntary sector to support residents and help them play a full role in community life. Further information can be found on the [Council's website](http://www.richmond.gov.uk/community_plan) at [www.richmond.gov.uk/community\\_plan](http://www.richmond.gov.uk/community_plan).

#### The Corporate Plan 2016 - 2019

2.1.7 The Corporate Plan presents the Council's priorities for residents for the period from 1 April 2016 to March 2019, with an emphasis on the programme activity to be delivered during the next 12 months. It also outlines how the Council will take these forward and defines how it will measure progress.

2.1.8 The Council's Corporate Plan has three overarching aims:

- 1 To transform local public services through partnership and collaboration through its community leadership role;
- 2 To build community capacity to enable residents and communities to take greater control over their lives and to shape and where appropriate deliver local services; and

**3** To act primarily as a strategic commissioning body with a reduced role in service delivery.

2.1.9 The corporate vision is for Richmond upon Thames to be the best borough in London; a borough identified by its green character, historic buildings, high quality appearance, vibrant high streets and outstanding schools and services; one where businesses and the voluntary sector can thrive; where citizens can help change neighbourhoods in which they live; and feel safe being part of one of London's safest boroughs. A borough where the most vulnerable of our residents are supported and where everyone can live as independently as possible with good health and a sense of wellbeing for the better.

2.1.10 The Council's priorities are categorised under the themes of 'People', 'Place', 'Resources' and 'How we work', in order to align our business planning processes with our commissioning intentions. Within these themes, the following service priorities have been identified:

1. People

- Protecting the most vulnerable
- A healthy borough
- The best schools in London

2. Place

- A green borough
- Supporting local business and arts
- A safe borough

3. Resources

- A lower tax borough
- An accountable and open council

4. How we work

- Involving our community
- Community leadership
- Fairness for all

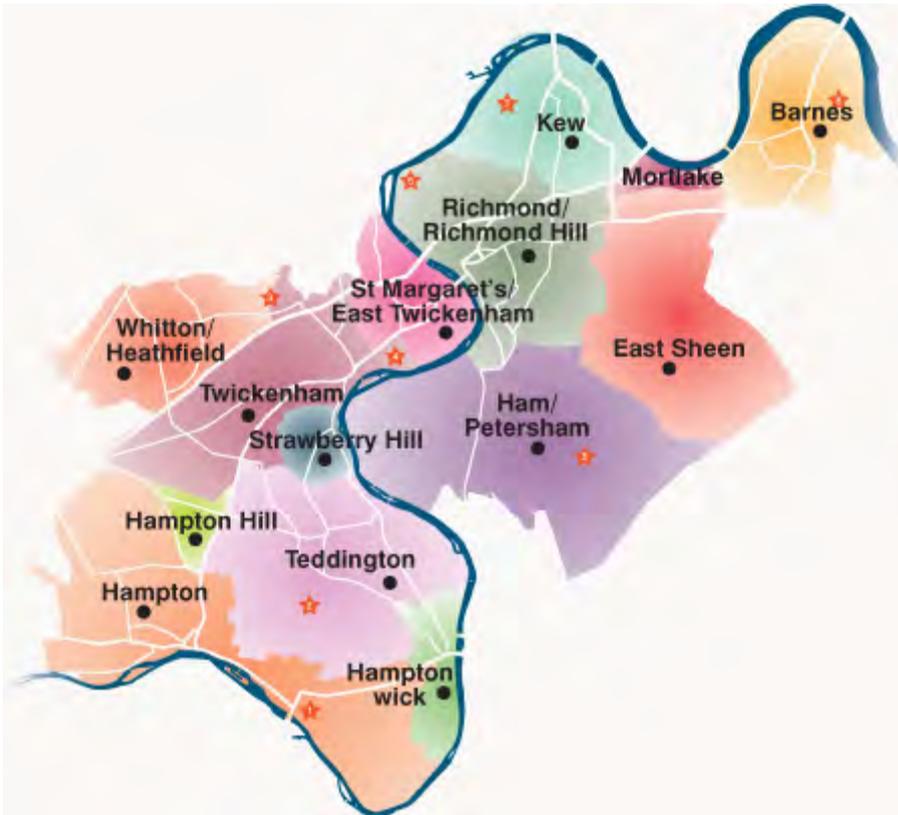
2.1.11 Further information can be found on the [Council's website](http://www.richmond.gov.uk/corporate_plan) at [www.richmond.gov.uk/corporate\\_plan](http://www.richmond.gov.uk/corporate_plan)

### Neighbourhood Planning

[New para] Neighbourhood Planning was introduced by the Localism Act 2011. It allows communities to influence the future of their local areas by preparing a Neighbourhood Development Plan for the area. Neighbourhood plans are led and written by the community, not the Council, and they have to be in general conformity with the strategic policies in the relevant local, regional and national planning policy documents and guidance. A neighbourhood plan that is prepared in line with the legal requirements and supported by a majority in a local referendum must be adopted by the Council. When adopted, a neighbourhood plan becomes part of the statutory development plan and will be taken into account alongside the Council's other plans when making decisions on planning applications in that area. In this borough, the Ham and Petersham Neighbourhood Forum is preparing a Neighbourhood Plan for its area.

### Village Planning

2.1.12 Village Plans have been developed for each of the borough's 14 villages. Each Village Plan describes a vision for the village area and identifies what the Council will do and what people can do to achieve the vision together. They set out the key issues and priorities and provide background information on the village areas.



2.1.13 Each village is distinctive in terms of the community, facilities and local character. The borough's villages are attractive with many listed buildings and Conservation Areas. The local character of each is unique, recognisable and important to the community and to the character of the borough as a whole. In response to the Council's 'All in One' survey, which showed that residents had a desire to shape planning guidance for their local area, the Council is developing Village Planning Guidance in the form of Supplementary Planning Document (SPDs), with the exception of Ham and Petersham, where the designated Neighbourhood Forum is developing its own Neighbourhood Plan for the area. The SPDs identify the key features and characteristics of the village areas, including the most important aspects and features that contribute to local character and that are valued by local communities. The Village Plan SPDs are the main starting point for design guidance to those seeking to make changes to their properties or who wish to develop in the area. Further information on the Council's Village Planning Process can be found on the [Council's website](http://www.richmond.gov.uk/village_plans) at [www.richmond.gov.uk/village\\_plans](http://www.richmond.gov.uk/village_plans)

2.1.14 The 2015 Residents' Survey showed that almost all Richmond residents (97%) are satisfied with their local area as a place to live. The natural environment with its high quality parks and open spaces, the location and convenience as well as the quiet and peaceful nature of the borough are the most important attributes for the borough's residents.

2.1.15 The Council's Uplift programme continues to rejuvenate the Whitton, Hampton North, Barnes, Mortlake, Ham, Fulwell and Hampton Hill areas of the Borough, which local people say are in need of improvement.

#### **The South London Partnership**

2.1.16 The South London Partnership is a sub-regional collaboration of five London boroughs: Croydon, Kingston upon Thames, Merton, Richmond upon Thames and Sutton. The partnership focuses on shaping sustainable growth, securing devolution to unlock opportunities and driving efficiency.

## Heathrow

2.1.17 The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts of Heathrow, particularly on traffic, noise and air quality. The Council's position on Heathrow is set out in the following documents:

- 1 Community Plan 2016 - 2020: This 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 of the airport. As part of achieving the Community Plan's key priority "For a greener borough", the Council will oppose any expansion of Heathrow Airport and any changes to the existing arrangements which will have an adverse impact on the borough.
- 2 Corporate Plan 2016-19: This sets out that the Council will take the lead from the community, who overwhelmingly voted against expansion of Heathrow Airport, and that we will work with other boroughs and influential parties to press the government to reject the 2015 Airport Commission report recommending a third runway at Heathrow.

2.1.18 The Council's Local Plan does not contain a policy on Heathrow as the airport does not lie within the borough boundary. However, in commenting on any planning application in relation to Heathrow Airport, the above statement sets out clearly the Council's position on Heathrow.

## 2.2 Strategic Vision

2.2.1 The Local Plan has 3 inter-related themes of 'Protecting Local Character', 'A Sustainable Future' and 'Meeting People's Needs'. These three themes provide the golden thread that runs through the Local Plan. They form the basis of the Strategic Vision set out below, which describes what the borough will be like in 2033.

## **The Local Plan Strategic Vision**

Our vision for the London Borough of Richmond upon Thames over the next 15 years is to build on the success of maintaining and enhancing the borough's villages, its unique character and developing a strong and varied sense of place, in partnership with local communities and other key stakeholders.

### **1. PROTECTING LOCAL CHARACTER**

#### **Villages and historic environment**

The borough's villages and their special and distinctive characters will have been protected, with each being unique, recognisable and important to the community and to the character of the borough as a whole. They will continue to maintain and enhance their distinctiveness in terms of the community, facilities and local character. Heritage assets including listed buildings and Conservation Areas, historic parks as well as Royal Botanic Gardens, Kew World Heritage Site, which contribute so significantly to the character of this borough, will have been protected and enhanced.

#### **Residential quality of life**

Richmond borough will be the best place in London to live as a result of the quality of the built environment which considers the health and wellbeing of local residents and the high quality design of new development that respects and enhances its distinctive character. The amenity of residents and local neighbourhoods will have been protected and action taken on environmental issues and pollution. The quiet and peaceful nature of the borough, alongside its breathtakingly beautiful parks and open spaces, will continue to ensure that all Richmond borough residents cherish their local area as a place to live.

#### **Natural environment, open spaces and the borough's rivers**

The outstanding natural environment and green infrastructure network, including the borough's parks and open spaces, biodiversity and habitats as well as the unique environment of the borough's rivers and their corridors will have been protected and enhanced where possible. Residents will continue to highly value and cherish the borough's exceptional environmental quality.

### **2. A SUSTAINABLE FUTURE**

#### **Sustainable growth and transport**

The borough's main centres will have accommodated the majority of higher density and larger scale developments, thus enabling people to walk to shops and services or use public transport. New development will be of exceptional design quality and will have respected the borough's environmental capacity and constraints through the optimisation of land. Development opportunities outside of the main centres will have been realised and well integrated within existing communities, the environment and infrastructure. Local communities will enjoy the new village heart in Mortlake and residents will have access to a choice of new and improved homes in Ham Close.

Whilst cars will still be a significant part of our future, the borough's improved transport network and interchanges will encourage many residents as well as those who work and visit the borough to make journeys using high quality public transport and walking and cycling routes. The built environment, spaces and public realm will be attractive and pleasant, and residents will have increasingly adopted active and healthy lifestyles and enjoy the borough's cycling and walking networks.

#### **The borough and its interrelationship with Greater London and the South East**

The borough will continue to relate in a sustainable way to Greater London and the South East in terms of providing homes, jobs, shops and services. Local communities and residents from neighbouring and other London boroughs as well as the wider region will enjoy the borough's exceptional parks, open spaces and recreational and cultural opportunities. The borough's reputation and role in providing the green lung for south west London will be recognised and cherished in Greater London and beyond.

The borough will continue to be an attractive and inviting place, and visitors will come to the borough to enjoy the many tourist attractions, including the unique, historic and cultural assets that are connected by the River Thames.

### **A sustainable and smart borough**

The Council will have played its part in minimising vulnerability of people and property to a changing climate, including mitigating and adapting to the effects of climate change and supporting the move towards zero carbon. The borough will be a place where innovation and Smart City technology is harnessed to enable innovative digital and communications infrastructure, enabling businesses to respond to customer demand, and to support the borough on its path to becoming smarter.

## **3. MEETING PEOPLE'S NEEDS**

### **Facilities to meet needs**

Residents will have a choice of new homes, including affordable homes, as well as the infrastructure required to support their daily needs. They will have access to a range of exceptional educational and training facilities, including a choice of schools and nurseries, community and healthcare facilities, shops and services as well as employment and recreational activities. Residents will have benefited from local training and employment opportunities, and they will continue to enjoy the strong sense of community and inclusiveness as well as social interaction and cohesion.

### **The borough's centres**

The borough's centres, including the main centres as well as local and neighbourhood centres and parades, will continue to perform well and flourish. Central Richmond will continue to thrive and a new and improved station will provide a welcoming and pleasant environment for all those that live, work and visit the borough. Twickenham, including the station and surrounding area as well as the riverside, will have been rejuvenated and developed into a flourishing and vibrant business and cultural centre. Whitton, Teddington and East Sheen will have maintained and enhanced their role in providing shops, services and employment opportunities for local communities.

### **Jobs and the local economy**

The borough's local economy will be successful. Jobs will be readily available and there will be a choice of employment opportunities as the borough's Key Office Areas as well as the industrial land and business parks will have been protected from encroaching residential development. Employment space will have supported new business start-ups and enabled businesses to grow. There will continue to be a high proportion and variety of small local businesses, offering local jobs, and further opportunities for residents to set up their own enterprise.



## 2.3 Strategic Objectives

2.3.1 The strategic objectives for the Local Plan outline what will need to be achieved to deliver the Local Plan's strategic vision. The objectives also set out how the key sustainability issues facing the borough, as identified in the Sustainability Appraisal and its Scoping Report, are addressed.

The following objectives set out how the key issues facing the borough, as set out in the Sustainability Appraisal, the Strategic Vision and the Spatial Strategy, will be delivered:

### **Protecting Local Character**

1. Maintain and enhance the borough's attractive villages, including the unique, distinctive and recognisable local characters of the different village areas and their sub-areas.
2. Protect and, where possible, enhance the environment including the heritage assets, retain and improve the character and appearance of established residential areas, and ensure new development and public spaces are of high quality design.
3. Protect and improve the borough's parks and open spaces to provide a high quality environment for local communities and provide a balance between areas for quiet enjoyment and wildlife and areas to be used for sports, games and recreation.
4. Protect and enhance the borough's network of green infrastructure that performs a wide range of functions for residents, visitors, biodiversity and the economy.
5. Protect and enhance the borough's biodiversity, including trees and landscape, both within open spaces but also within the built environment and along wildlife corridors.
6. Protect and improve the unique environment of the borough's rivers, especially the River Thames and its tributaries as wildlife corridors, as opportunities for recreation and river transport where possible, increasing access to and alongside the rivers where appropriate, and gain wider local community benefits when sites are redeveloped.

### **A Sustainable Future**

1. Minimise and mitigate the effects of climate change by requiring high levels of sustainable design and construction including reductions in carbon dioxide emissions by minimising energy consumption, promoting decentralised energy and the use of renewable energy as well as requiring high standards of water efficiency.
2. Promote and encourage development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property; this includes by risk of flooding, water shortages, subsidence and the effects of overheating.
3. Optimise the use of land and resources by ensuring new development takes place on previously developed land, reusing existing buildings and encouraging remediation and reuse of contaminated land.
4. Reduce or mitigate environmental impacts and pollution levels (such as air, noise, light, odour, fumes water and soil) and encourage improvements in air quality, particularly along major roads and areas that already exceed acceptable air quality standards.
5. Ensure local environmental impacts of development are not detrimental to the health, safety and the amenity of existing and new users or occupiers of a development or the surrounding area.
6. Promote safe and sustainable transport choices, including public transport, cycling and walking, for all people, including those with disabilities.
7. Encourage improvements to public transport, including quality and connectivity of transport interchanges, and support the use of Smart City technology and practices.
8. Promote sustainable waste management through minimising waste and providing sufficient land for the reuse, recycling and treatment of waste, and minimise the amount of waste going to landfill in line with the West London Waste Plan.

9. Support sustainable growth of the visitor economy for the benefit of local communities and promote the borough as an attractive and inviting place to visit and enjoy.
10. Conserve and enhance the borough's unique historic and cultural assets that are connected by the River Thames.
11. Create attractive and pleasant environments and spaces that promote active and healthy lifestyles, including recognising their benefits to residents' social life and their economic benefits to the borough's centres.

### **Meeting People's Needs**

1. Ensure there is adequate provision of facilities for community and social infrastructure that are important for the quality of life of residents and which support the growing population, by protecting existing and, where required, securing new facilities and services that meet people's needs.
2. Ensure there is sufficient provision of facilities and services for education and training for all age groups to help reduce inequalities and support the local economy; this includes school places as well as children's centres and youth provision and promoting local employment opportunities and training programmes.
3. Ensure there is a suitable stock and mix of high quality housing that reflects local needs by providing a choice of housing types and sizes, with higher density development located in more sustainable locations, such as the borough's centres and areas better served by public transport.
4. Pursue all opportunities to maximise affordable housing across the borough through a range of measures, including providing more choice in the different types of affordable housing and different levels of affordability.
5. Ensure there continues to be good provision of, and access to, shopping and other local services and facilities that meet the needs of our communities.
6. Reinforce the role of Richmond, Twickenham, Teddington, Whitton and East Sheen centres, which play an important role in the provision of shops, services, employment and housing as well as being a focus for community and cultural life.
7. Ensure that local and neighbourhood centres as well as parades of local importance provide a focus for local communities to meet, shop, work and spend leisure time.
8. Encourage opportunities for leisure, entertainment, sport, cultural activity and the development of community life.
9. Ensure there continues to be a wide variety of employment and training opportunities available to residents and support for businesses.
10. Protect and encourage land for employment use, particularly for affordable small / medium spaces, start-up and incubator units and flexible employment space, in order to support the borough's current and future economic and employment needs.
11. Facilitate inward investment and support businesses, particularly small and medium-sized enterprises and creative industries to grow the employment base of the borough.
12. Encourage the creation of healthy environments and support healthy and active lifestyles, including through measures to reduce health inequalities. This includes ensuring there is an appropriate range of health facilities that meet local needs, and tackling childhood obesity by restricting access to unhealthy foods, particularly fast food takeaways, in proximity to schools.
13. Promote inclusive and sustainable communities, social interaction, cohesive, healthy and dementia-friendly communities, and enable the older population to remain independent and active for longer.

## 3 Spatial Strategy

### 3.1 Spatial Strategy

#### Introduction

3.1.1 The Local Plan aims to meet the needs of local communities and businesses through the provision of housing, employment, schools, community services, social infrastructure, leisure and other local services, in a sustainable way.

3.1.2 National policy and guidance sets out the concept of 'sustainable development', which has three dimensions: economic, social and environmental. The policies in the Local Plan follow the approach of the presumption in favour of sustainable development as set out in national policy. This Plan defines the local dimensions of sustainable development and shows how this presumption in favour is expressed locally; in particular, the Council places strong emphasis on protecting and, where possible, enhancing the special environment, local character and uniqueness of this borough by recognising the environmental constraints and limits that provide the context for growth in the borough and which need to be respected.

3.1.3 The Spatial Strategy, as set out below, takes forward the existing Spatial Strategy of the Core Strategy. It builds on information from our evidence base, including feedback from public consultations such as through the development of the Village Plans as well as the Sustainability Appraisal, which sets out a detailed and up-to-date analysis of the key sustainability issues, challenges and opportunities for the borough. The Spatial Strategy also sets out how the main elements of the strategic vision and strategic objectives for the borough are to be delivered over the plan period from 2018 to 2033.

#### Spatial Strategy Summary

3.1.4 The Spatial Strategy reinforces the borough's context as an outer London Borough that is characterised by a high quality natural, built and historic environment with highly valued open landscape, parks, green spaces and opportunities for sport, recreation, culture and tourism. The overarching principles are to protect the unique local character (as set out in the Village Planning Guidance SPDs and in neighbourhood plans, such as the emerging Ham and Petersham Neighbourhood Plan), maintain and enhance our open spaces as well as our heritage, achieve high levels of sustainability and ensure all communities have access to housing, employment opportunities, services and facilities.

3.1.5 The unique and locally distinctive historic and cultural environment as well as the protected parks and open spaces limit the opportunities for development and growth within the borough. The borough is constrained by its already developed areas, limited opportunities for redevelopment, large expanses of protected open space and by the River Thames and its floodplain.

3.1.6 The Spatial Strategy emphasises that local community needs, including delivery of housing and the infrastructure required to support it, are expected to be met without compromising the quality of the natural, built and historic environment. This means in particular that the highly valued network of green infrastructure, including its contribution to biodiversity objectives, will be protected, and where possible enhanced. The borough's parks and open spaces provide not only recreational opportunities for those that live and work in this borough, but also for local communities and residents in neighbouring and other London boroughs, by providing a green lung for southwest London. Therefore, there is a presumption against the loss of, or building on, greenfield sites in this borough. The Spatial Strategy and the Local Plan policies, taken as a whole, also set out how development and use of land will contribute to the mitigation of, and adaptation to, climate change.

3.1.7 The Spatial Strategy and supporting evidence demonstrate that the Council can meet its strategic housing target without using greenfield sites. New housing will be provided through redevelopment and maximising the use of brownfield sites. Affordable housing is a key priority of the Plan and all opportunities to maximise affordable housing through a range of measures will be pursued.

3.1.8 Higher density and larger development, including commercial schemes, will as far as possible be concentrated in the borough's five main centres (i.e. Richmond, Twickenham, Teddington, Whitton and East

Sheen), thus enabling people to walk or cycle to shops and services or use public transport. There will continue to be opportunities for development outside these centres and on key development sites, such as Stag Brewery in Mortlake and Ham Close in Ham - these sites are identified for development in this Plan.

3.1.9 Whilst there have been significant structural changes to the retail sector in recent years, particularly in the growth in popularity of internet shopping, research into the health of the centres, including vacancy rates, suggests that the borough's main centres continue to perform well. The Council's Retail Study (2014) estimates that an increase in retail floorspace of 21,700sqm gross will be needed by 2024, comprising of about 4,000sqm gross of convenience goods floorspace, 11,500sqm gross of comparison goods floorspace and 6,500sqm gross of Class A3/A4/A5 floorspace. Some of this need could be met by the re-occupation of existing vacant units in some centres. However, it is unlikely that vacant shops can account for more than a quarter of this additional capacity. Site allocations in the Local Plan are sufficient to meet the remainder of the forecast increase in floorspace.

3.1.10 The Spatial Strategy also reinforces the character of the borough's villages. The local character of each village is unique, recognisable and important to the community and to the aesthetic of the borough as a whole.

### Protecting Local Character

3.1.11 The borough has an outstanding built, historic and natural environment and a key priority of the Spatial Strategy is that this unique local character continues to be protected and enhanced throughout the borough. The different village areas and their special character within the borough, including those along the River Thames and its banks, will be maintained and enhanced, and historic views and the setting of heritage assets will be protected. In established residential areas the historic character as well as local biodiversity and trees will be maintained.

3.1.12 The borough is recognised as having exceptional green and open spaces of great historic significance, including Richmond Park, Bushy and Home Parks and the Royal Botanic Gardens Kew, which is of international significance and is inscribed as a World Heritage Site. The existing areas of designated open land will continue to be protected for their visual amenity, historic biodiversity, sport and recreation.

3.1.13 A hierarchy of open spaces of different sizes and functions will be maintained, and improvements sought in areas of deficiency for open space or biodiversity. Many of the borough's parks and open spaces are of regional or metropolitan importance in providing opportunities for recreation, and many have historic significance, biodiversity value or can be regarded as areas of relative tranquillity. The open space network, including the Blue Ribbon network of the River Thames and River Crane corridors as well as other tributaries, and the links in between provide the natural infrastructure that performs a wide range of functions for residents, visitors, biodiversity and the economy. The borough's parks and open spaces provide not only recreational opportunities for those that live and work in this borough, but also for local communities and residents in neighbouring and other London boroughs, thus providing a green lung for south/west London. The Spatial Strategy demonstrates that the Council can meet its borough's housing needs without releasing open land that is protected by designations such as Green Belt or Metropolitan Open Land.

3.1.14 In order to achieve sustainable growth within the borough, future development is therefore expected to take place on brownfield sites. Improvements, such as enhancing the immediate environment, creating new pedestrian and cycling linkages, especially to and from as well as alongside the rivers, and other environmental enhancement will be sought.

3.1.15 Sites designated for their biodiversity and nature conservation value, including the connectivity between habitats will be protected and enhanced.

### A Sustainable Future

3.1.16 As an Outer London borough there has always been considerable in and out commuting for work, education, shopping and leisure activities and this is likely to continue, even if residents are able to carry out most day to day activities locally. In addition, the borough is an attractive and inviting place to visit and enjoy. Sustainable growth of the visitor economy for the benefit of the local area will be supported and the Council will promote and support the enhancement of the borough's existing tourist attractions, including

the unique, historic and cultural assets that are connected by the River Thames, such as Royal Botanic Gardens Kew, Ham House and Hampton Court Palace.

3.1.17 To reduce environmental impacts, including air pollution and congestion, and to maximise opportunities for health and promoting active lifestyles, the Council will continue to work with its partners to improve and promote safe, sustainable and accessible transport choices, including public transport, cycling and walking. Focusing development in the main centres of the borough (i.e. Richmond and Twickenham as well as Teddington, East Sheen and Whitton) will result in sustainability benefits, including a reduction in the need to travel by car and also mitigate the effects of development pressure on the rest of the borough. A main element of the Spatial Strategy is to promote cycling and walking, which contribute significantly towards creating an attractive and pleasant environment, which has been shown to be not only beneficial to an individual's health and social life, but also to bring economic benefits to the borough's centres.

3.1.18 The Spatial Strategy reinforces the need to improve accessibility, including through the quality and connectivity of transport interchanges, as identified in the London Plan and Outer London Commission. The Council will work with its partners, including the operating companies, and propose improvements to be taken forward through its Local Implementation Plan for Transport.

3.1.19 To play our role in minimising and mitigating the effects of climate change, the Council will continue to require high levels of sustainable design and construction and remains committed to working towards zero carbon standards for all new developments. The Spatial Strategy takes forward the Council's commitment to sustainable design and construction. In particular, it seeks to reduce carbon dioxide emissions from development and standards of water efficiency that are higher than set out in national standards. This approach to mitigating the impacts of climate change, including measures to minimise energy use, encouraging decentralised energy as well as renewable energy, is justified as it is based on local evidence and need.

3.1.20 The Council will promote and encourage development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property. Development will need to be located and designed so it can adapt to and cope with the potential impacts and consequences of climate change such as heat waves. Adapting to the likely effects of climate change also includes ensuring that development is located away from areas considered to be at high risk of flooding, incorporating sustainable drainage wherever possible, ensuring the borough's green infrastructure network is maintained, which also contributes to ensuring that biodiversity can adapt to a changing climate, as well as protecting our water resources and water quality.

3.1.21 The Spatial Strategy seeks to ensure that local environmental impacts of all development proposals do not lead to detrimental impacts on the health, safety and the amenity of existing and new users or occupiers of development or the surrounding area. Consideration will therefore be given to a range of potential impacts, including, but not limited to, air pollution, noise and vibration, light pollution, odours and fumes and land contamination. In addition, the Strategy seeks to ensure that waste is managed in accordance with the waste hierarchy, which is to reduce, reuse or recycle waste, as close as possible to where it is produced.

### Meeting People's Needs

3.1.22 The Council places high priority on the provision of community and social infrastructure, which is essential to support the projected population growth of the borough. Such facilities are often at the heart of local communities and they are important for the quality of life of residents. Community and social infrastructure facilities play an important role in creating more inclusive and sustainable communities and they help to promote social interaction as well as encouraging people to lead more healthy and active lives. Development pressures and high land values in the borough mean there is pressure to redevelop sites. It is therefore vital that existing facilities and services that meet people's needs are protected. Therefore the Council will resist the loss of existing social or community infrastructure.

3.1.23 There is a continuing need for additional school and nursery places across the borough. The Council's School Place Planning Strategy provides evidence that more school places are required to meet longer-term forecast demand, particularly in the primary phase. The Council will work with partners to encourage the provision of facilities and services for education and training for all age groups to help reduce inequalities

and support the local economy. This also includes promoting local employment opportunities and training programmes, particularly where there are opportunities arising from development.

3.1.24 The role of the voluntary and community sector will be essential to meeting people's needs, in terms of their role as employers, in contributing to a sense of place, the development of communities and residents' health and well-being.

3.1.25 The Local Plan plays a crucial role in facilitating the creation of healthy environments and the Council promotes and supports healthy and active lifestyles, including measures to reduce health inequalities. The Spatial Strategy seeks to ensure that development results in patterns of land uses and facilities that make the healthy choice the most convenient and attractive option for residents, helping them to lead healthier lives more easily. The Council also supports the creation of environments and a public realm that are inclusive and accessible for the older population, including for those with dementia, and enable the older population to remain independent and active for longer.

3.1.26 There is an emerging obesity issue in the borough, particularly in children. Access to fast food takeaways detracts from the ability to adopt healthy lifestyles and undermines healthy eating initiatives that may be in place at local schools. Therefore, the Spatial Strategy is to restrict access to unhealthy foods, particularly fast food takeaways, near existing schools, which will assist in tackling childhood obesity.

3.1.27 Access to local community facilities, services, shops and meeting places such as community centres and local pubs is important in facilitating social interaction and general community wellbeing and happiness. The Local Plan will ensure that there continues to be a good balance of uses in the borough's centres and that there are sufficient opportunities for shopping and other local services that meet the needs of communities. In order to ensure all residents have continued access to local shops and services, the Council will seek to protect such facilities, including not just those within the main centres but also in local and neighbourhood centres and parades of local importance as well as those in more isolated locations, where they are especially important to elderly or less mobile shoppers, those with young children and those without access to cars. There is good coverage across the borough in terms of food shopping provision and therefore the Spatial Strategy continues the existing approach of ensuring there are top-up shopping opportunities within 400 metres of residents' homes.

3.1.28 The housing target for the borough is set out in the London Plan, with 315 dwellings per annum to be provided for the period of 2015-2025. The Mayor of London will expect the Council to exceed this target. This Spatial Strategy and the policies of the Local Plan identify opportunities for development to come forward by optimising the use of sites, particularly in centres with good public transport accessibility and mixed use redevelopments.

3.1.29 The Local Plan is informed by an up to date borough-wide Strategic Housing Market Assessment (SHMA). This considers and assesses the local housing needs and has informed the housing policies as set out in this Plan. Affordable housing is a priority in the borough and is key to delivering the Spatial Strategy and the relevant strategic objective. Therefore, the Council will pursue all opportunities to maximise affordable housing through a range of measures, including providing more choice in the different types of affordable housing with the aim to provide for different levels of affordability.

3.1.30 The Council's Monitoring Report on Housing continues to identify a sufficient five year housing land supply in line with the London Plan target. As at 1 April 2015 the housing land supply in the borough potentially provides for 2154 units over the next five years which is 579 units more than the target supply in the London Plan, and another potential 1875 units in years six to ten. The Report also includes a map showing the spatial distribution and expected housing growth, based on the strategic housing land supply. This demonstrates that the Council can continue to meet its strategic housing target without building on or using greenfield sites. New housing will therefore be provided through redevelopment and optimising the use of brownfield sites. Higher density development will be sought in more sustainable locations, such as the borough's centres and areas better served by public transport, subject to compatibility with the surroundings and local context, respecting the quality, local character, including heritage value, and amenity of existing neighbourhoods and villages.

3.1.31 The Local Plan ensures that developments will provide for a choice in housing types and sizes. Generally, the Spatial Strategy is to seek family sized accommodation in the borough, particularly within the residential areas; in the borough's centres, a higher proportion of small units would be appropriate. Opportunities for younger people to get on the housing ladder and downsizing for older people to smaller units were identified in consultations with local communities. Therefore, the Local Plan will ensure that developments provide an appropriate housing mix that reflects local needs and which is appropriate to the location in which the development is proposed.

#### **Strengthening local employment and supporting businesses**

3.1.32 Business and industrial areas are historically dispersed across the borough, and all play an important role in providing business and employment opportunities for the community. The GLA's Employment Projections (2015) estimate that the number of jobs in the borough will be 105,000 by 2031 and 109,000 by 2036. This equates to an increase in 18,000 jobs between 2011 and 2031 and therefore suggests that the borough will experience very strong demand for employment space. The latest employment figures from the Business Register and Employment Survey show that significant growth has taken place between 2012 and 2014, amounting to an additional 4,500 jobs. Therefore, the Local Plan seeks to protect and maintain this employment base, and enhance it through new provision to accommodate the expected job growth. In addition, due to Government changes to the planning system, including the introduction of Permitted Development Rights from offices to residential, the evidence base confirms that there is a clear need to strengthen the Spatial Strategy and approach to protecting and encouraging land for employment use, particularly for affordable small / medium spaces, start-up units and flexible employment space, in order to support the borough's current and future economic and employment needs.

3.1.33 As a result of the Permitted Development Rights which allow the change of use of offices to residential, there has been a potential loss of approximately 80,000sqm of office floorspace (an estimated 26% of overall office floorspace in the borough and potential employment space for 6,400 people based on one person per 12sqm). As a consequence, the Council has already introduced two Article 4 Directions to prevent further changes of use from office to residential without the need for planning permission. In addition, this Local Plan introduces a new designation for 'Key Office Areas', in which a more stringent approach to the loss of offices will apply. The Council will encourage new inward investment and the creation of new offices, including refurbishment of older offices and flexible workspaces, particularly in the 'Key Office Areas'. The increase in office floorspace in redevelopment schemes will be particularly supported.

3.1.34 In relation to the borough's business parks, industrial estates and creative industries, it is acknowledged that the borough has a very limited supply of industrial floorspace and demand for this type of land is high. The London Plan states that a 'restrictive' approach towards the transfer of industrial land to other uses should be adopted in the borough, which means that industrial land should not be released for other uses. Therefore, in order to deliver this key priority and strategic objective, locally important industrial land and business parks, which are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities, are identified in the Local Plan. Any loss of industrial space within these areas will be strongly resisted. This is to ensure that the borough can continue to provide for local business and employment needs.

#### **Spatial Distribution of Development**

3.1.35 Despite the constrained nature of the borough, there is a need to provide more housing, employment, education, retail, leisure and other community and infrastructure services that are needed to support growth within the borough. The traditional village based structure will be maintained and reinforced with a range of housing, local shops and services, employment and recreational activities, at the most local level possible, to reinforce community life, increase accessibility and reduce the need to travel.

3.1.36 Both Richmond and Twickenham, together with the residential areas surrounding them, are expected to deliver the highest number of housing units, with the broad expected pattern of around 1,000 to 1,050 units in each over the period 2015 to 2025. Across Teddington and the Hamptons and the surrounding residential area the broad expected pattern is around 650-700 units over the period 2015 to 2025, around 400-500 in East Sheen and surrounds, and around 100 in Whitton.

3.1.37 Richmond and Twickenham centres, with their accessible locations and established range of services, provide the most sustainable options for development in the borough, especially for major commercial developments, including offices and retail. There is some potential for 'tall' buildings and higher densities close to Richmond and Twickenham train stations. Increased densities of housing, including some 'taller' buildings as well as the provision of smaller units, are appropriate in these centres, to an extent that is compatible with the established character as well as environmental and historic constraints.

3.1.38 **Richmond** main centre is defined as a 'major' centre in the London Plan's network of town centres. The Spatial Strategy is for Richmond to continue to be a thriving major centre with convenience and specialist shops, employment, leisure and tourism, cultural and social facilities. The Council supports the potential growth of the centre to provide opportunities for leisure and tourism. The expansion of retail provision in the centre, particularly to support its comparison goods shopping and specialist shopping role, is encouraged. Richmond Station provides a major redevelopment opportunity, which could provide substantial interchange improvements as well as a range of appropriate uses, including making a substantial contribution to the identified retail floorspace need (Use Classes A1, A3, A4 and A5) of approximately 10,000sqm in the main centre. New office development is encouraged, and businesses and retailers will be supported, including through the forthcoming Business Improvement District.

3.1.39 **Twickenham** is the largest district centre in the borough and has already seen a variety public realm and environmental improvements. Revitalising the centre is a key theme and the main strategy as set out in the adopted Twickenham Area Action Plan (2013), and the benefits from redevelopment opportunities continue to be maximised. The former Post Office Sorting Office, Twickenham Station, Richmond upon Thames College, Harlequins Rugby Football ground, Twickenham Stadium, the Central Depot and Twickenham Riverside provide excellent opportunities for rejuvenating and contributing to the vitality and viability of Twickenham centre. Twickenham centre is suitable for new major commercial development, which attracts both local people and people who live outside the borough, and the Council supports Twickenham's Business Improvement District. The evidence base suggests an indicative need of 3,200sqm (gross) of retail floorspace by 2024. The projections up to 2024 suggest there is scope for about 700sqm gross of convenience goods floorspace, 1,600sqm gross of comparison goods floorspace (both Use Class A1) and 900sqm gross of Use Class A3/A4/A5 floorspace. A reasonable proportion could be accommodated in vacant premises which, along with site allocations included in the Twickenham Area Action Plan will meet the identified need.

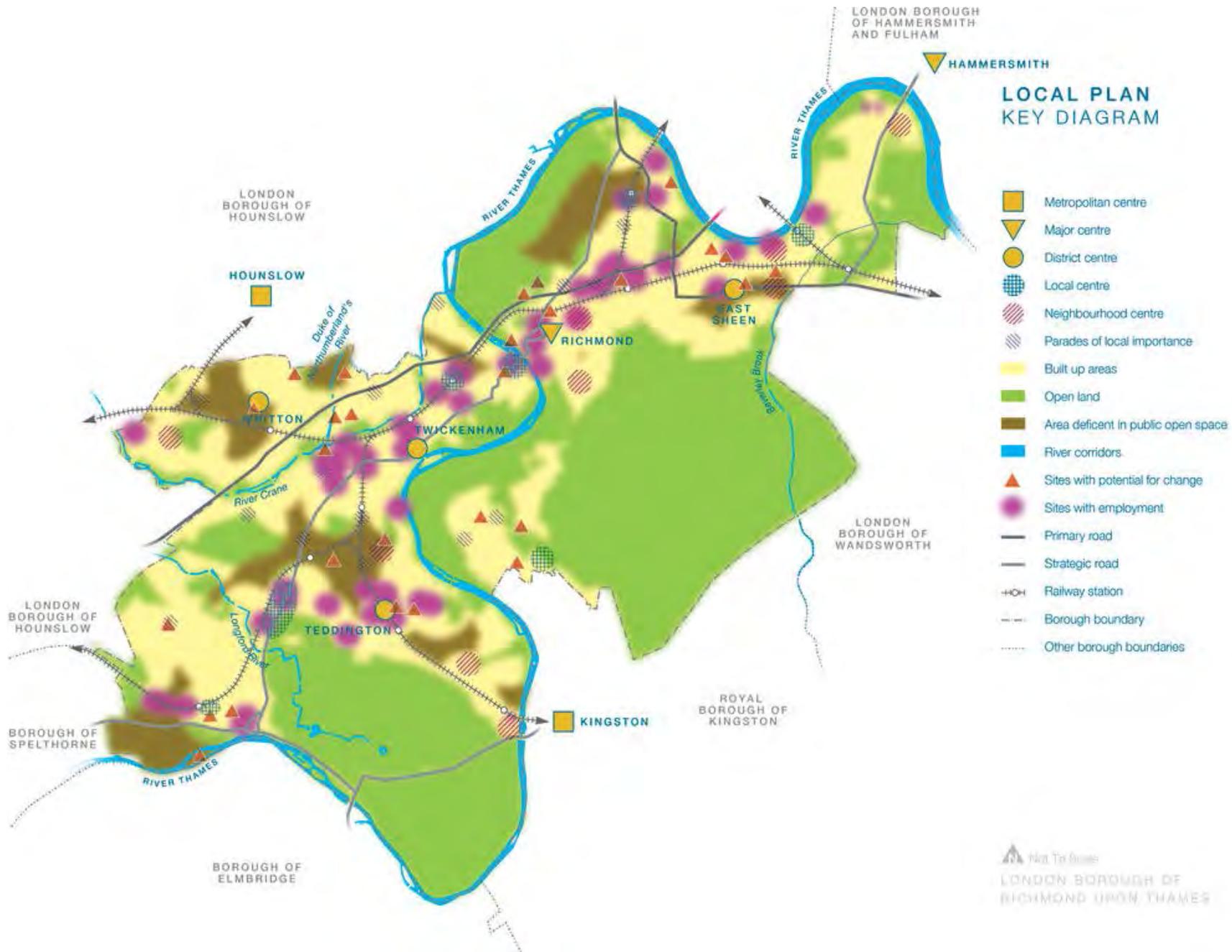
3.1.40 The Strategy for **Teddington, East Sheen and Whitton**, which are defined as district centres in the London Plan, is to maintain and enhance, rather than significantly expand, their role of providing shops, services and employment opportunities for local communities. The Council seeks to maintain and, where appropriate, enhance Teddington's and East Sheen's role in providing office space for businesses, and new offices are encouraged. Teddington has a well-established restaurant sector and the Council supports establishments that serve the local community. For East Sheen, the Council will seek to create a 'centre' for the village at Milestone Green and improve the convenience of shopping for the community including through a range of uses. Whitton centre plays a particular role for visitors to Twickenham Stadium and the Council seeks to maintain and, where appropriate, improve the range and choice of shopping in the centre, including supporting an improved evening offer. Higher densities could be achieved in Teddington, East Sheen and Whitton centres, but as they are predominately low-rise and characterised by 3-storey buildings, 'taller' buildings would not be appropriate. However, higher residential densities could be achieved without recourse to tall or taller buildings within these centres. The evidence base suggests an indicative need of 2,000sqm in Teddington, 1500sqm in East Sheen and 900sqm in Whitton of retail floorspace (Use Classes A1, A3, A4 and A5) by 2024. (All figures referred to are gross). Whereas East Sheen and Whitton could accommodate some of this in existing vacant units, this is less likely in Teddington. Site allocations are sufficient to meet the remainder of the projection.

3.1.41 There are also other significant development areas outside of the above five main centres, such as Stag Brewery in Mortlake, Ham Close in Ham, Richmond upon Thames College in Twickenham and Barnes Hospital in East Sheen. The evidence base suggests an indicative need of 4,250sqm (gross) of Use Class A3/A4/A5 floorspace by 2024 in total for these smaller centres. This projection takes into account commitments. It is estimated that approximately a third of this projection could be accommodated in vacant

premises and along with site allocations, notably the retail allocation at Ryde House, East Twickenham this need can be met.

**3.1.42 Local and neighbourhood centres as well as parades of local importance** provide a focus for local communities and opportunities to meet, shop, work and spend leisure time. The size and function of these centres vary considerably, ranging from larger local centres, such as Barnes and Hampton Hill with a good range of food and comparison shops, independent and specialist shops, community and cultural facilities, through to parades with a small number of shops meeting very local but valued needs.

3.1.43 The successful function of the smaller centres of the borough is of particular importance as the benefits for residents and local communities are significant by providing goods and services that result in a reduced need to travel. The strategy of protecting and reinforcing these smaller centres also supports local businesses and provides local employment opportunities, which in turn benefits the wider community. Local centres in particular can create or foster a sense of community and inclusiveness that adds to the cohesiveness of the surrounding community.



## 4 Local Character and Design

### 4.1 Local Character and Design Quality

#### **Policy LP 1**

##### **Local Character and Design Quality**

A. The Council will require all development to be of high architectural and urban design quality. The high quality character and heritage of the borough and its villages will need to be maintained and enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.

To ensure development respects, contributes to and enhances the local environment and character, the following will be considered when assessing proposals:

1. compatibility with local character including the relationship to existing townscape, development patterns, views, local grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;
2. sustainable design and construction, including adaptability, subject to aesthetic considerations;
3. layout, siting and access, including making best use of land;
4. space between buildings, relationship of heights to widths and relationship to the public realm, heritage assets and natural features;
5. inclusive design, connectivity, permeability (as such gated developments will not be permitted), natural surveillance and orientation; and
6. suitability and compatibility of uses, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site.

All proposals, including extensions, alterations and shopfronts, will be assessed against the policies contained within a neighbourhood plan where applicable, and the advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design.

##### **Shopfronts**

B. The Council will resist the removal of shopfronts of architectural or historic interest. Shopfronts, including signage and illumination, should complement the proportions, character, materials and detailing, surrounding streetscene and the building of which it forms part. Blinds, canopies or shutters, where acceptable in principle, must be appropriate to the character of the shopfront and the context within which it is located. External security grilles and large illuminated fascias will only be allowed in exceptional circumstances. In sensitive areas, such as Conservation Areas and relevant Character Areas as identified in the Village Planning Guidance SPDs, rigid and gloss finish blinds will generally be unacceptable.

##### **Advertisements and hoardings**

C. The Council will exercise strict control over the design and siting of advertisements and hoardings to ensure the character of individual buildings and streets are not materially harmed, having regard to the interests of amenity and public safety (including highway safety).

#### **Village Planning Guidance**

4.1.1 The London Borough of Richmond upon Thames has been divided into a series of smaller village areas. Each village is distinctive in terms of the community, facilities and local character, which together make up

the unique and distinctive character of the borough. The villages are attractive with most containing many listed buildings and Conservation Areas, and the local character of each village is unique, recognisable and important to the community and to the aesthetic of the borough as a whole.

4.1.2 Village Planning Guidance SPDs have been or are being developed for the village areas (with the exception of Ham and Petersham, where the designated Neighbourhood Forum is developing its own Neighbourhood Plan for the area). The SPDs identify the key features and characteristics of the village areas that are valued by local communities. Each village area has been subdivided into Conservation Areas and Character Areas, and for each area the context, character and local features have been analysed and assessed. The Village Planning Guidance SPDs are the main starting point for design guidance to those seeking to make changes to their properties or to develop new properties in the area. The Council has also developed a range of other SPDs, including on Design Quality, House Extensions and External Alterations, Small and Medium Housing Sites, Front Gardens and Shopfronts. These focus on protecting and improving the quality of the local built environment and provide the necessary detail to assess context, local character and design quality.

#### **Design quality and character**

4.1.3 This policy requires developers and applicants to take a sensitive approach to the architectural design of new buildings, extensions and modifications to existing buildings, as well as landscape proposals. The Council does not wish to encourage a particular architectural style or approach but expects each scheme to be to a high quality, with very high quality expected within Conservation Areas. Schemes should be based on a sound understanding of the site and its context, following the locally specific guidance set out in the Village Planning Guidance SPDs.

4.1.4 Given the built up nature of the borough it is anticipated that most new buildings will be as a result of redevelopment where compatibility with the existing urban fabric is a key consideration. The purpose is to maintain, reinforce and where possible enhance the local character and features that give the area its distinctive and clear identity. Opportunities should be taken to improve the general level of design of an area where appropriate. New development should respect existing street and development patterns.

#### **Materials**

4.1.5 The Council will expect the use of high quality materials and planting reflecting the local character and distinctiveness of an area in all schemes where this contributes positively to the appearance and character of an area.

#### **Relationship to other buildings and public realm**

4.1.6 The space between buildings should be respected and development be in harmony with surrounding buildings. Elements such as windows, roofs, shopfronts and doors should relate to one another in such a way as to maintain or complement the proportions of the surroundings, particularly as expressed in the relationship between solids and voids. Landscape design (including hard and soft landscaping) and the intended use of any open spaces must form an integral part of any proposals. Particular attention needs to be given to the interface between the public and private space and how an area will connect or relate to the wider open space network.

4.1.7 Modern shop and office layouts should be integrated with the proportions of surrounding development in order to reduce any potential visual impact. Development should be in scale with the adjoining buildings and in proportion with the average street width as defined by building frontages which reflect the urban grain, as required. Where uniform building heights are part of the character of a street it will not normally be appropriate to permit abrupt variations to the general roof line or eaves line, while in other areas irregular building heights may be appropriate.

#### **Access and layout**

4.1.8 New development, including new routes and access arrangements, should be appropriately integrated with the existing area, street frontage and existing local routes. The applicant will have to demonstrate how

new development relates to the existing public transport, pedestrian and cycle networks and how it fosters social inclusion.

4.1.9 Gated developments, which prevent permeability of sites, will be resisted and pedestrian and cycle links through new development must be publicly accessible at all times.

#### **Co-location and compatibility**

4.1.10 Proposals should demonstrate that the proposed uses and activities are suitable and compatible with each other and surrounding land uses. The Council will give consideration to the mix of uses proposed and how they will support and connect with the local area through the layout, design and management of the site. Suitable uses will depend on the location and could include a combination of residential, retail, office, leisure and entertainment uses. It is not always necessary to include residential within a mixed scheme, and in some circumstances the inclusion of residential might impact on the operation of other uses.

4.1.11 Proposals should maximise the opportunities the site holds to generate a design, which will minimise its environmental impact and take account of micro-climates. Well informed design decisions at an early stage, such as the orientation of a building, can reduce energy consumption through responding positively to climatic conditions.

#### **Shopfronts and shop signs**

4.1.12 Shopfronts of architectural or historic interest make an important contribution to the character and appearance of the borough. Therefore, the Council will resist the removal of shopfronts of architectural or historic interest. The design of new, and alterations to existing, shopfronts is important both to the appearance of the individual property and to the character and appearance of its local area. Any proposal will therefore be assessed against relevant SPDs, including Village Planning Guidance as well as the Shopfronts SPD.

4.1.13 Poorly sited or badly designed shop signs, including projecting signs, and illumination can have a detrimental effect on the amenity (including character and appearance) of an area; on the living conditions of residents; and may raise issues of public safety. Security shutters can impact on the visual appearance of an area and can create a hostile environment. The Council will welcome proposals from groups of shops to add character to the street scene by the use of harmonious high quality design, colours and materials for their shopfronts.

#### **Advertisements and hoardings**

4.1.14 Advertising can enhance the appearance and vitality of a street. However, it can also cause considerable damage to visual amenity by cluttering the built environment and detracting from the quality of the area. Advertisements (defined under the Town and Country Planning Control of Advertisements Regulations) include not only hoardings, but also devices such as blinds and canopies with lettering, flags with logos and balloons. In considering proposals for an advertising hoarding or other advertisement, including blinds and canopies where relevant, or in deciding whether to take action to remove an existing advertisement, the Council will have regard to the following criteria:

- 1 hoardings should be of good design and in scale with their surroundings and be of a temporary nature only;
- 2 any advertisement display must not have an adverse effect upon road traffic conditions and public safety;
- 3 advertising displays will not be permitted where they would have an adverse effect upon:
  - a Conservation Area;
  - listed buildings or Buildings of Townscape Merit;
  - views from or within open spaces or along the Thames riverside and its tributaries;
  - predominantly residential areas;
- 4 high level, brightly illuminated, or flashing advertisements will not normally be permitted, especially where they might disturb residents.

4.1.15 As a general rule, advertisement displays will be restricted to shopping, commercial, industrial or transport locations, where they comply with the above criteria and do not cause excessive visual clutter. It must be borne in mind that the Council's level of control is limited and that a number of advertisements do not require formal consent.

4.1.16 The Council will use its powers to remove any harmful advertisement or hoarding erected without consent and where appropriate and practical, to challenge existing hoardings and advertisements that cause demonstrable harm to amenity or public safety.

## 4.2 Building Heights

### Policy LP 2

#### Building Heights

The Council will require new buildings, including extensions and redevelopment of existing buildings, to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights, by the following means:

1. require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area;
2. preserve and enhance the borough's heritage assets, their significance and their setting;
3. respect the local context, and where possible enhance the character of an area, through appropriate:
  - a. scale
  - b. height
  - c. mass
  - d. urban pattern
  - e. development grain
  - f. materials
  - g. streetscape
  - h. Roofscape and
  - i. wider townscape and landscape;
4. take account of climatic effects, including overshadowing, diversion of wind speeds, heat island and glare;
5. refrain from using height to express and create local landmarks; and
6. require full planning applications for any building that exceeds the prevailing building height within the wider context and setting.

4.2.1 The borough is characterised primarily by low to medium-rise residential development patterns, which has produced very attractive townscapes, which are important to the borough's distinctive character.

4.2.2 The borough-wide Sustainable Urban Development Study demonstrates that higher density development would only be appropriate in the main centres. The conclusions of the study are:

- The potential for 'tall' buildings is generally clustered close to Richmond and Twickenham train stations.
- The centres of Richmond and Twickenham are areas where 'taller' buildings may be appropriate.
- Higher densities could potentially be achieved in Whitton, East Sheen and Teddington centres. However, Whitton High Street is defined by predominately 3-storey terrace buildings and as such 'taller' buildings are unlikely to be appropriate. The majority of East Sheen centre is defined by predominately 3-storey terrace buildings, and in these areas 'taller buildings' would not be appropriate. Teddington centre is generally low-rise (i.e. 3-storeys) and the High Street is within a

designated Conservation Area; therefore, opportunities for 'taller buildings' would be very limited and only considered in locations where there are currently existing 'tall'/'taller' buildings.

- There are only very few sites outside of the above centres with existing 'tall' or 'taller' buildings, including Richmond upon Thames College, Twickenham Rugby Stadium, Teddington Studios and Mortlake Brewery. Within these specific and exceptional sites, 'taller' or 'tall' buildings may be appropriate, subject to the criteria set out in this policy.
- Elsewhere in the borough it is considered that 'taller' or 'tall' buildings are likely to be inappropriate and out of character with its historic context and local distinctiveness.

4.2.3 'Taller' buildings are defined as those being significantly taller than the neighbouring buildings, but less than 18 metres in height (below six storeys); a 'tall' building is defined as a building of 18 metres in height or higher.

4.2.4 There is an expectation that higher residential densities will be delivered without recourse to tall buildings. Where new larger developments are proposed some variation in roofscape and height can provide visual interest to the streetscape and avoid overbearing and bulky building forms. Therefore, in some cases, differentiation in roof forms and roof lines within parameters based on the prevailing building height, in order to break up large blocks and reflect the predominantly domestic scale of the borough, may be acceptable.

4.2.5 Tall or taller buildings can have a greater impact on their environment than other building types, posing problems of overshadowing, overlooking, creation of harmful micro-climates, worsening air quality and harmful effects on residents and amenity spaces. The siting and massing of new buildings will be controlled to avoid harmful intrusions into the skyline and on significant local views. In particular buildings that are higher and bulkier than their surroundings can have a visual impact over a wide area, altering the historic skyline and the character and appearance of Conservation Areas as well as open spaces. They can also dominate, obscure or detract from the setting of listed buildings and Buildings of Townscape Merit, Conservation Areas, Scheduled Monuments, Registered Parks and Gardens and the World Heritage Site at Kew.

4.2.6 Any buildings or features taller or bulkier than the surrounding townscape will only be acceptable where a full design justification based on a comprehensive townscape appraisal and visual assessments (including computer visualisations and photo montages) has demonstrated that no material harm is caused to interests of acknowledged importance. Any proposal for a tall or taller building should make a positive contribution to the existing townscape, character and local distinctiveness of the area. In addition, proposals for tall or taller buildings should be designed to positively contribute to streetscape such as by creating high quality public spaces that deliver wider public realm benefits or incorporating uses that enable local communities and the public to access the ground level of buildings. Design considerations include matters relating to height, scale, massing, alignment, silhouette, crown, style, facing materials and use.

4.2.7 The excessive height of a development can have an intrusive effect on its immediate environment as well as over the whole area from which the building is visible. Where tall / bulky buildings have been erected and which have spoiled the historic skyline as well as the established character of areas, they will be considered as a poor precedent for future development. Therefore, existing tall or taller buildings should not be used as a precedent for allowing further, or replacement, tall or taller buildings where the existing ones are harmful to the townscape or amenity.

4.2.8 The Advice Note on Tall Buildings produced by Historic England should be followed. Appropriate building heights should be determined by an analysis and understanding of the local character of a street/area as set out in Village Planning Guidance SPDs. Policies, including those relating to local character, design quality, views and vistas, design and construction, amenity and living conditions, should also influence the proposed height of any new development.

4.2.9 Applications for tall or taller buildings will be required to express the height of buildings in storeys and metres in order for a robust assessment of their effects to be carried out. Any building services and telecommunications equipment on the roof of the building will need to be taken account of in the overall height of the building and will therefore have to be carefully incorporated into the design.

## 4.3 Designated Heritage Assets

### Policy LP 3

#### Designated Heritage Asset

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

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

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

1. in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;
2. in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or

3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.

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

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

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

4.3.1 The borough is characterised by primarily low to medium-rise residential patterns, which has produced very attractive townscapes and is important to the borough's distinctive character.

4.3.2 The borough's exceptional historic environment is central to its character. Many parts of the borough are covered by Conservation Areas, including the majority of Richmond and Twickenham centres. As at 2017, the borough has 75 designated Conservation Areas and each area is accompanied by a Conservation Area Statement, which explains why and when it was designated, including a short history and a map showing the boundary. The borough's Conservation Area Statements and any other studies or appraisals, including the Village Planning Guidance SPDs, include details of many of the most impressive and important buildings as well as audits of assets within the public realm, which are of heritage or aesthetic value.

4.3.3 The borough has approximately 1,115 listed buildings, including some war memorials, the four Scheduled Ancient Monuments as well as 14 Historic Park and Gardens that are on the Historic England Register of Historic Parks and Gardens, all of which make a significant contribution to the special character of the borough. The borough is also home to the Royal Botanic Gardens Kew World Heritage Site, for which there is a separate policy in this Plan.

4.3.4 New developments of an exceptional design, which respond to their local and historic context, can make a very positive contribution to the historic environment. It is important to retain not only the character, distinctiveness and setting of designated heritage assets within a Conservation Area, but also the interrelationship between buildings, how they relate to surrounding spaces and areas as well as whole or partial street views, including into and out of a designated area, park, garden or landscape.

4.3.5 Applications for development that affects designated heritage assets or their setting must:

- Describe the significance of any heritage assets affected, including any contribution made by their setting; the extent of the setting will be proportionate to the significance of the asset. Appropriate expertise should be used to assess the significance of a heritage asset and its setting.
- Demonstrate how the development protects, and where possible enhances, the setting, including views, gaps and vistas and any other features, as identified in the relevant Conservation Area Statement/Study, or in relation to a listed buildings, Scheduled Ancient Monument or Historic Park or Garden.
- Set out how particular attention has been paid to scale, proportions, height, massing, historic building lines, the pattern of historic development, use, design, detailing and materials.
- Conserve and retain original or historic garden or landscape features as well as architectural features such as windows, doors, chimney stacks, walls and gates.
- Describe how the proposal retains the integrity and significance of the building as a whole, the location and hierarchy of rooms, historic floor levels, the structure of the building including foundations, fabric as well as features such as original staircases, original roof structures and other features identified as being of significance.

- Demonstrate that the proposal is of exceptional design that integrates with and makes a positive contribution to the historic environment; and
- Take opportunities to reinstate missing features which are considered important to, or to remove additions or modifications that harm, the significance of the asset.

4.3.6 Outline planning applications will not be accepted within Conservation Areas because the character, appearance and distinctiveness of those areas can be dependent on the detail of developments.

4.3.7 Conservation Area Statements define and record the features which make each Conservation Area important. Together with the Village Planning Guidance SPDs, they include an analysis of historical development, layout, plot configuration, buildings, shopfronts, memorials, other street furniture, walls and boundaries, open land and civic space. Conservation Area Studies and Management Plans set out proposals for the preservation and enhancement of the character, appearance and distinctiveness of a Conservation Area. Applicants will be expected to demonstrate how the proposal complies with the relevant Conservation Area appraisals, plans and studies, as well as the Village Planning Guidance SPDs, and any other relevant SPDs/SPGs adopted by the Council. These will also be used when assessing proposals within and/or affecting designated heritage assets. The level of detail provided should be proportionate to the importance of the heritage asset.

4.3.8 Heritage assets are irreplaceable and ill-conceived proposals can cause irreversible damage to the character and distinctiveness of the borough's high quality townscape and landscape. Therefore the partial or full demolition of a designated heritage asset, or its alteration, will only be considered acceptable where full justification has been provided to demonstrate that any harm or loss has been carefully weighed up against wider public benefits that might result from the proposal.

- Substantial harm to, or loss of, a Grade II listed building, Park or Garden should be exceptional.
- Substantial harm to or loss of designated heritage assets of the highest significance, notably Scheduled Monuments, Grade I and II\* listed building, Grade I and II\* Registered Parks and Gardens should be wholly exceptional.
- Insensitive alterations to, or extensions to neighbouring developments of, listed buildings will not be allowed.

4.3.9 Listed buildings are best used for their original purpose and therefore the Council will resist the change of use of a listed building where this would harm its significance in relation to heritage interest and character. It is acknowledged that there may be circumstances where the original use has become obsolete and there may be cases where a change of use may be the only viable option to keep the designated heritage asset in active use. In such instances, the Council will take into account the desirability of sustaining and enhancing the significance of the heritage asset and putting it to a viable use consistent with its conservation. Where a change of use may be appropriate, sensitive adaptation of a historic building can be possible but the onus will be on the applicant to justify the new use and to demonstrate how the benefits outweigh the harm of departing from other planning policies if applicable. Any proposed development, additional structures or buildings within the setting of the designated heritage asset, must only be the minimum necessary to secure the asset's long-term future. The applicant will also have to demonstrate that the new use will be compatible with the fabric, exterior, interior and setting of the designated heritage asset, and that it will not detract from other evidential, historic, aesthetic or communal heritage values.

4.3.10 It is acknowledged that some proposals may require residential development to support the restoration and reuse of designated heritage assets; however, such proposals must have benefits that outweigh the disbenefits of departing from other planning policies. The proposed development must be the minimum necessary to secure the designated heritage asset's long-term future.

4.3.11 Legislation places upon those who own or manage listed buildings an obligation to ensure that they are properly maintained. Where appropriate, the Council will use its powers to ensure that this is done, particularly if the asset is on the Heritage at Risk register. Owners are urged to employ specialists to ensure the standard of workmanship in carrying out modifications or additions to designated historic assets is of high quality. A deteriorated state of an asset as a result of deliberate neglect or damage is not taken into

account when making decisions. Where the quality of a Conservation Area has been eroded, the Council will take steps to ensure that new development and other schemes such as works to the public realm enhance the historic environment.

## 4.4 Non-Designated Heritage Assets

### Policy LP 4

#### Non-Designated Heritage Assets

The Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, and other local historic features.

There will be a presumption against the demolition of Buildings of Townscape Merit.

4.4.1 The borough's exceptional historic environment is central to its character. Locally listed buildings, i.e. Buildings of Townscape Merit (BTM), and memorials (particularly war memorials, including those on private land or within buildings) as well as other local historic features such as statues, plaques, horse and cattle troughs, historic bollards, post boxes and historic telephone boxes are historic assets worthy of protection.

4.4.2 Buildings of Townscape Merit are buildings, groups of buildings or structures of historic or architectural interest, which are locally listed due to their considerable local importance. The Council's adopted SPD on BTMs sets out the criteria that will be taken into account when considering whether a building or structure should be designated as BTM. The policy sets out a presumption against the demolition of BTMs unless structural evidence has been submitted by the applicant, and independently verified at the cost of the applicant. Should demolition prove necessary, a high standard of design that complements the surrounding area will be required in any replacement building. Locally specific guidance on design and character is set out in the Council's Village Planning Guidance SPDs, which applicants are expected to follow for any alterations and extensions to existing BTMs, or for any replacement structures.

4.4.3 The Council has recorded all war memorials in the borough on a register. Memorials should be retained in situ, if possible, or sensitively relocated.

4.4.4 Applicants will be required to:

1. retain the character of Buildings of Townscape Merit, war memorials and any other non-designated heritage assets;
2. submit a Heritage Statement to assess the potential harm to, or loss of, the significance of the non-designated heritage asset, including from both direct and indirect effects;
3. describe the significance of the non-designated heritage asset affected, including any contribution made by their setting; the extent of the relevant setting will be proportionate to the significance of the asset. Appropriate expertise should be used to assess a non-designated heritage asset; and
4. retain or restore the structures, features and materials of the asset, which contribute to its architectural integrity and historic interest.

## 4.5 Views and Vistas

### Policy LP 5

#### Views and Vistas

The Council will protect the quality of the views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means:

1. protect the quality of the views and vistas as identified on the Policies Map, and demonstrate such through computer-generated imagery (CGI) and visual impact assessments;
2. resist development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline;
3. require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced;
4. require development to respect the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background;
5. seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured;
6. seek improvements to views within Conservation Areas, which:
  - a. are identified in Conservation Area Statements and Studies and Village Plans;
  - b. are within, into, and out of Conservation Areas;
  - c. are affected by development on sites within the setting of, or adjacent to, Conservation Areas and listed buildings.

4.5.1 The quality and character of the views and vistas as shown on the Policies Map will need to be protected. In addition, the Council will explore opportunities to create attractive new views and vistas.

4.5.2 The presence of a view or vista will influence the design quality, configuration, height and site layout of new development or extensions to existing developments. Views may also need to be considered where the viewpoint is a long way from the development, such as in the case of views from Richmond Hill and numerous vantage points in Richmond Park. Where appropriate, improvements, such as opening up or enhancing views for the benefit of the general public where views have been obscured by fencing, buildings or overgrown trees, will be encouraged.

4.5.3 The Richmond, Petersham and Ham Open Spaces Act (1902) prevents development of the land on and below Richmond Hill in order to protect the unique and distinctive foreground views that it provides to the west and south. This is the only view in England to be protected by an Act of Parliament. In addition, the view from King Henry VIII's Mound to St Paul's Cathedral is the subject of a Direction made by the Secretary of State as part of strategic guidance and is one of eight such strategic views of St Paul's across London. The protection and enhancement of the strategic view from King Henry's Mound to St Paul's will be achieved by consultation between the relevant planning authorities in London, including the Greater London Authority. The London View Management Framework SPG will be used when considering applications affecting protected views.

4.5.4 It is important that the impact of development on views, including in and around Conservation Areas, as well as of landmarks defining points of townscape interest is taken into account. In addition to the strategic view from King Henry's Mount in Richmond Park to St Paul's Cathedral, the borough also has specifically recognised views and vistas that are important to protect.

4.5.5 The Council will work in partnership with neighbouring boroughs where there are cross-boundary views and settings so that these are positively managed.

4.5.6 This policy complements other design and conservation policies. The Council will take account of wider urban design considerations, and the setting of designated heritage assets, in addition to the views and vistas identified on the Policies Map. Locally designated and protected views and vistas will be identified in the forthcoming SPD on Views and Vistas.

## 4.6 Royal Botanic Gardens, Kew World Heritage Site

### Policy LP 6

#### Royal Botanic Gardens, Kew World Heritage Site

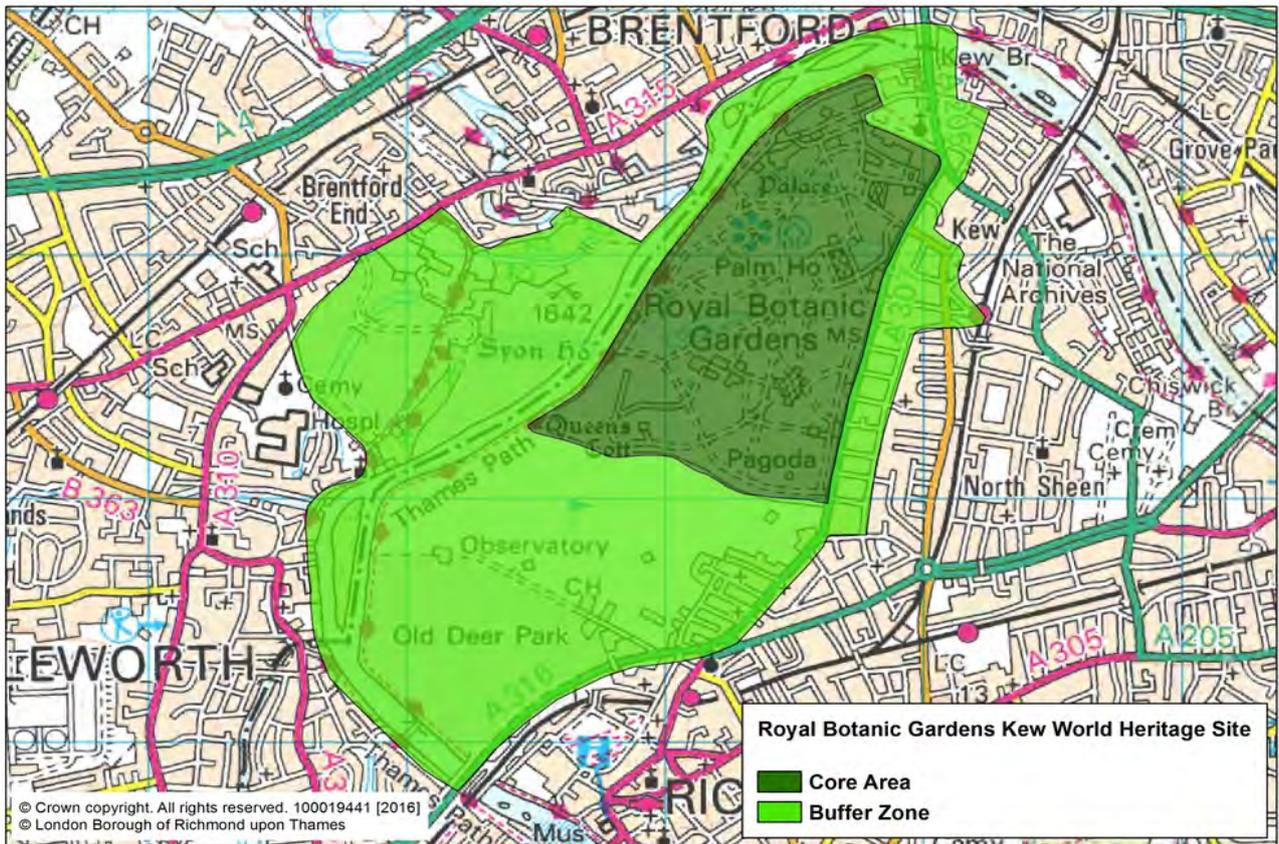
The Council will protect, conserve, promote and where appropriate enhance the Royal Botanic Gardens, Kew World Heritage Site, its buffer zone and its wider setting. In doing this, the Council will take into consideration that:

- The World Heritage Site inscription denotes the highest significance to the site as an internationally important heritage asset.
- The appreciation of the Outstanding Universal Value of the site, its integrity, authenticity and significance, including its setting (and the setting of individual heritage assets within it) should be protected from any harm.
- Appropriate weight should be given to the Royal Botanic Gardens, Kew World Heritage Site Management Plan and the Royal Botanic Gardens, Kew Landscape Master Plan.

4.6.1 The United Nations Educational, Scientific and Cultural Organisation (UNESCO) World Heritage Committee inscribes World Heritage Properties onto its World Heritage List for their Outstanding Universal Value – *cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity*. The Royal Botanic Gardens, Kew was inscribed on the UNESCO World Heritage Site List in 2003, in recognition of its outstanding and internationally significant universal value.

4.6.2 The outstanding international importance of the WHS is a key material consideration to be taken into account by the Council when determining planning applications and listed building consents. The International Council on Monuments and Sites (ICOMOS) method of heritage impact assessment for World Heritage Sites as well as the Mayor of London's SPG on London's World Heritage Sites will be taken into account when assessing proposals. The Council will protect and, where possible, enhance the WHS for the benefit of future generations by carefully scrutinising development proposals for their likely effect on the site or its setting where these occur within:

- a. The designated WHS, as shown in the figure below ('Core Area');
- b. The defined buffer zone, as shown in the figure below ('Buffer Zone'); and
- c. The wider and more extensive setting of the WHS, including views to and from the site.



4.6.3 The Royal Botanic Gardens, Kew World Heritage Site Management Plan and the Landscape Master Plan provide a framework for guiding the activities that take place in the site in order to ensure that these activities do not conflict with the need to protect the qualities, which make the Royal Botanic Gardens, Kew such a special and unique place.

4.6.4 As part of the positive strategy for the conservation and enjoyment of the historic environment, national policy guidance requires the consideration of designated heritage assets most at risk through neglect, decay or other threats. In this context, the Council will work closely with its partners, including Historic England and the London Borough of Hounslow, to ensure that the Royal Botanic Gardens, Kew WHS, including its buffer zone, wider setting and views to and from the site, is given the highest significance as a designated heritage asset, and to prevent any further harmful impacts from development proposals, particularly as a result of inappropriate and unsympathetic tall buildings, in Brentford and Hounslow's wider Great West Corridor.

## 4.7 Archaeology

### Policy LP 7

#### Archaeology

The Council will seek to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public. It will take the necessary measures required to safeguard the archaeological remains found, and refuse planning permission where proposals would adversely affect archaeological remains or their setting.

Desk based assessments and, where necessary, archaeological field evaluation will be required before development proposals are determined, where development is proposed on sites of archaeological significance or potential significance.

4.7.1 Archaeological investigations in the borough to date have revealed evidence of prehistoric, Roman, Saxon, Medieval and post Medieval archaeology. An archaeological site is a place (or group of physical sites) in which evidence of past activity is preserved and can include industrial sites, marine and foreshore deposits/structures, buildings, machinery, roads, artefacts, wartime structures and modest domestic buildings. The preservation of archaeological remains is a material consideration when determining planning applications. As set out in national policy guidance, archaeological remains of national importance should be preserved in situ. While it is desirable to treat all remains in this manner, it is recognised that it is not always practical to do so.

4.7.2 However, regardless of their status, established procedures of consultation and evaluation as set out in national policy guidance and other advice must be followed in preparing development proposals. Prospective applicants should make an initial assessment of the archaeological potential and significance of a site by consulting with the appropriate specialist bodies, Historic England and the Greater London Archaeological Advisory Service (GLAAS). GLAAS is the borough's archaeological advisers and should be consulted with regard to archaeological matters.

4.7.3 Archaeological Priority Areas (APAs) can be identified by local planning authorities under the Town and Country Planning Act 1990 and the borough's APAs are shown on the Archaeological Constraints Map. The borough's APAs are due to be reviewed in 2017 by GLAAS as part of a rolling programme of reviews across London. The Council will therefore provide a link to the latest available APAs constraints map.

## 4.8 Amenity and Living Conditions

### Policy LP 8

#### Amenity and Living Conditions

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

1. ensure the design and layout of buildings enables good standards of daylight and sunlight to be achieved in new development and in existing properties affected by new development; where existing daylight and sunlight conditions are already substandard, they should be improved where possible;
2. ensure balconies do not raise unacceptable overlooking or noise or disturbance to nearby occupiers; height, massing or siting, including through creating a sense of enclosure;

3. ensure that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting, including through creating a sense of enclosure;
4. ensure there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climatic effects.

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

4.8.1 This policy covers all development, including extensions, alterations and changes of use. The aim is to protect the living conditions and amenity of occupants of new, existing, adjoining and neighbouring buildings as far as possible from the unreasonable impacts of new development.

4.8.2 The Council will support proposals for development that protect the amenity of both its future occupiers and the occupiers of adjoining properties. The term 'property' encompasses both the building as well as its curtilage.

4.8.3 New buildings and extensions need to take careful account of the amenity and living conditions of neighbours, with particular regard to natural light, light pollution, privacy, noise and disturbance. Adverse impacts on neighbouring properties and their occupiers, including on the most well used part of residential gardens, can include actual and perceived loss of light (including to solar panels), overlooking, loss of privacy, alterations to micro-climates, pollution from noise or light as well as by creating a sense of enclosure, or through overpowering, overbearing or obtrusive development. This could be from the new development itself or from associated development and uses such as ancillary buildings, parking areas, access ways, gardens, communal open space and hard and soft landscaping.

4.8.4 Particular attention needs to be paid to these matters in order to address public concerns in relation to amenity and living conditions impacts. However, setting fixed standards could undermine the Council's duty ability to maintain, and where appropriate, enhance the character, appearance and distinctiveness of the borough, particularly of Conservation Areas. It is the overall design, taking all factors into account including the area's character, that will be the determinant of whether a proposal provides reasonable amenity and living conditions.

#### **Daylight, sunlight and solar glare**

4.8.5 In assessing whether sunlight and daylight conditions are good, both inside buildings and in gardens and open spaces, the Council will have regard to the most recent Building Research Establishment guidance, both for new development, and for properties affected by new development. In some circumstances, mathematical calculations to assess daylighting and sunlighting may be an inappropriate measure, and an on-site judgement will often be necessary.

4.8.6 Solar glare principally occurs when the sun is low in the sky and dazzles the eye either directly or indirectly via a reflected surface. Glare or dazzle can occur when sunlight is reflected from a glazed façade or area of metal cladding. This can affect road users, such as pedestrians, cyclists and drivers, and the occupants of adjoining buildings. The potential impact of glare or dazzle will need to be carefully considered and assessed where relevant to ensure there are no adverse impacts.

#### **Visual intrusion, privacy and outlook**

4.8.7 An overbearing, overpowering or over-dominant development can significantly reduce the quality of living conditions both inside and outside, in new as well as existing developments. The degree of overlooking depends on the distance and the horizontal and vertical angles of view. The impact on the sense of enclosure will often be dependent on on-site judgement.

4.8.8 Whilst there will be some impact from any new development, the test is one of harm in relation to the impact on habitable rooms, which includes all separate living rooms and bedrooms, plus kitchens with a floor area of 13sqm or more. The minimum distance guideline of 20 metres between habitable rooms within residential development is for privacy reasons; a greater distance may be required for other reasons, or a lesser distance may be acceptable in some circumstances. These numerical guidelines should be assessed on a case by case basis, since privacy is only one of many factors in site layout design; where the established pattern of development in the area (layout and height) may favour lesser distances. The distance of 20 metres is generally accepted as the distance that will not result in unreasonable overlooking. Where principal windows face a wall that contains no windows or those that are occluded (e.g. bathrooms), separation distances can be reduced to 13.5 metres. Where the impact of a building is on another within the same development site, measures can also be applied to minimise overlooking, such as splays, angles of buildings, obscure glazing etc. A Supporting Planning Statement should set out justification for a reduction in these distances.

4.8.9 Privacy of gardens and courtyards is also important. However, public spaces and communal amenity areas will benefit from a degree of overlooking due to the increased level of surveillance it can provide.

4.8.10 Balconies or terraces on roofs of main buildings can be visually intrusive and result in serious intrusion into the privacy and quiet enjoyment of neighbouring residential properties.

4.8.11 Outlook is the visual amenity enjoyed by occupants when looking out of their windows or from their garden; how pleasant an outlook is depends on what is being viewed. Loss of daylight/sunlight (based on Building Research Establishment guidance), overshadowing, loss of outlook to the detriment of residential amenity are material planning considerations; however, the loss of a private view from a property is not protected.

4.8.12 The Council's SPDs, including on Householder Extensions and External Alterations, Residential Development Standards as well as on Small and Medium Housing Sites, provide further guidance and illustrations on how to assess sunlight/daylight, overshadowing, visual intrusion, privacy and space between buildings.

## **Policy LP 9**

### **Floodlighting**

Floodlighting, including alterations and extensions, of sports pitches, courts and historic and other architectural features will be permitted unless there is demonstrable harm to character, biodiversity or amenity and living conditions.

The following criteria will be taken into account when assessing floodlighting:

1. the impacts on local character or historic integrity;
2. the impacts on amenity and living conditions;
3. the impacts on biodiversity and wildlife;
4. the benefits and impacts of the provision of floodlighting on the wider community;
5. the benefits and effects on the use and viability of the facility;
6. that it meets an identified need as set out within the council's playing pitch strategy;

Favourable consideration will be given to the replacement or improvement of existing lighting where it provides improvements to existing adverse impacts.

4.9.1 Floodlighting can enable the full use of outdoor sport and leisure facilities, but consideration must be given to any demonstrable harm to biodiversity, amenity and local character.

4.9.2 Factors which will be taken into account when assessing proposals for floodlighting will be:

- The benefits: the need for lighting has to be demonstrated by the applicant. Issues to consider are: how many people will use or enjoy the facility, for how many hours a week and for what purpose; what would be the wider benefits of the provision; will it affect the viability of the facility; will it create fuller use of the facility; will it create sports development and health activities; will it create coaching or opportunities for youth activities; will it enhance the appreciation of the historic or architectural heritage of the borough; will it enhance security and safety; does it meet an identified need as set out within the Council's Playing Pitch Strategy;
- Effect on biodiversity: is it within or adjacent to an area designated as important for biodiversity (habitats and species); what would be the impacts on species and habitats;
- Effect on the wider area: is it within or adjacent to a designated heritage asset; is it within the Thames Policy Area, Green Belt, Metropolitan Open Land; would it have a significant adverse effect on these designations;
- Effect on amenity and living conditions: effects and impacts when lit in terms of sky glow, glare (including the glare caused by light bouncing off a surface), light trespass, noise and disturbance from users; the appearance of the installation when switched off;
- Energy usage and energy efficiency (the use of low energy lighting will be expected);
- Any planned mitigation measures such as restriction on lighting levels and hours of use.

4.9.3 It is important that floodlights are designed to be as unobtrusive as possible when unlit, in terms of number, height, width, design, colour and siting. Light pollution should be minimised to protect biodiversity as well as occupiers of properties, passers by and vehicle users using best available lighting technologies in terms of impact and energy efficiency. Innovative, smart lighting technologies which create a better spread and focus and have less impact on the environment will be required. Applicants are referred to guidance notes published by the Institution of Lighting Engineers such as the Guidance Notes for the Reduction of Obtrusive Light as well as the guidance produced by Sport England and the Institution of Lighting Engineers on Artificial Sports Lighting.

4.9.4 If permission is granted, conditions or Planning Obligations may be imposed to restrict the lighting levels and times of use, or to implement other measures to minimise possible adverse effects such as post-installation requirements and the need to maintain correct settings as well as monitoring, both within the site and on adjoining land.

## 4.10 Local Environmental Impacts, Pollution and Land Contamination

### Policy LP 10

#### Local Environmental Impacts, Pollution and Land Contamination

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

Developers should follow any guidance provided by the Council on local environmental impacts and pollution as well as on noise generating and noise sensitive development. Where necessary, the Council will set planning conditions to reduce local environmental impacts on adjacent land uses to acceptable levels.

#### Air Quality

B. The Council promotes good air quality design and new technologies. Developers should secure at least 'Emissions Neutral' development. To consider the impact of introducing new developments in areas already subject to poor air quality, the following will be required:

1. an air quality impact assessment, including where necessary, modelled data;
2. mitigation measures to reduce the development's impact upon air quality, including the type of equipment installed, thermal insulation and ducting abatement technology;
3. measures to protect the occupiers of new developments from existing sources;
4. strict mitigation for developments to be used by sensitive receptors such as schools, hospitals and care homes in areas of existing poor air quality; this also applies to proposals close to developments used by sensitive receptors.

#### Noise and Vibration

C. The Council encourages good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected. The following will be required, where necessary:

1. a noise assessment of any new plant and equipment and its impact upon both receptors and the general background noise levels;
2. mitigation measures where noise needs to be controlled and managed;
3. time limits and restrictions for activities where noise cannot be sufficiently mitigated;
4. promotion of good acoustic design and use of new technologies;
5. measures to protect the occupiers of new developments from existing sources.

#### Light Pollution

D. The Council will seek to ensure that artificial lighting in new developments does not lead to unacceptable impacts by requiring the following, where necessary:

1. an assessment of any new lighting and its impact upon any receptors;
2. mitigation measures, including the type and positioning of light sources;
3. promotion of good lighting design and use of new technologies.

### **Odours and Fume Control**

E. The Council will seek to ensure that any potential impacts relating to odour and fumes from commercial activities are adequately mitigated by requiring the following:

1. an impact assessment where necessary;
2. the type and nature of filtration to be used;
3. the height and position of any chimney or outlet;
4. promotion and use of new abatement technologies;

### **Land Contamination**

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

### **Construction and demolition**

G. The Council will seek to manage and limit environmental disturbances during construction and demolition as well as during excavations and construction of basements and subterranean developments. To deliver this the Council requires the submission of Construction Management Statements (CMS) for the following types of developments:

1. all major developments;
2. any basement and subterranean developments;
3. developments of sites in confined locations or near sensitive receptors; or
4. if substantial demolition/excavation works are proposed.

Where applicable and considered necessary, the Council may seek a bespoke charge specific to the proposal to cover the cost of monitoring the CMS.

4.10.1 Developers should explore ways to minimise any harmful and adverse environmental impacts of development, including during construction and demolition. Where possible, development that is likely to generate pollution should be located away from sensitive uses such as hospitals, schools, care homes and wildlife sites. The design and layout of new development should minimise conflict between different land uses, taking account of users and occupiers of new and existing developments. Therefore, any noisy or polluting activities or features such as plant equipment, should be positioned away from sensitive areas where possible to ensure any detrimental impacts on health, living conditions or amenity are kept to acceptable levels.

4.10.2 In addition, where there are already significant adverse effects on the environment, amenity or living conditions due to pollution, sensitive uses should ideally be steered away from those areas. However, given the limited availability of land for development in this borough, this will not always be possible. Therefore, new developments, including changes of use, should mitigate and reduce any adverse impacts resulting from air and light pollution, noise, vibration and dust to acceptable levels.

4.10.3 The Council will be preparing SPDs and/or Advice Notes to provide additional guidance on local environmental impacts, pollution, air quality, noise and construction management, which will contain further guidance and clear requirements, including methodologies, for the various assessments that may need to be submitted as part of certain types of planning applications.

### **Air Quality**

4.10.4 Good air quality is vital to the health and wellbeing of the borough. There are a number of areas in the borough that do not comply with the air quality targets and action must be taken to control, minimise and reduce the contributing factors of poor air quality.

4.10.5 The whole of the borough has been declared as an Air Quality Management Area (AQMA) and as such any new development and its impact upon air quality must be considered very carefully. Strict mitigation will

be required for any developments proposed within or adjacent to 'Air Quality Focus Areas'. An 'Air Quality Focus Area' is a location that has been identified as having high levels of pollution (i.e. exceeding the EU annual mean limit value for nitrogen dioxide) and human exposure. Air Quality Focus Areas are designated by the Greater London Authority. The Council will consider the impact of introducing new developments to areas already subject to poor air quality, and the impact on the new occupiers of that development, especially in sensitive uses such as schools.

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

#### **Noise and Vibration**

4.10.7 Noise and/or vibration arise from a variety of sources, such as major roads, railways and aircraft, as well as industrial and commercial sources. This can have a significant effect on health, quality of life, amenity, living conditions and the environment in general. Therefore this needs to be considered when new developments may create noise and vibration, and also when new developments would be sensitive to existing conditions.

4.10.8 Applicants need to consider acoustic design at an early stage of the planning process to ensure occupiers of new and existing noise sensitive buildings are protected.

4.10.9 The Council is in the process of developing a SPD for Noise Generating and Noise Sensitive Development. This sets out guidance intended to help protect the local occupiers of new or existing noise sensitive buildings from existing or introduced noise sources, and, where possible, improve amenity and living conditions. The SPD will assist applicants, decision makers, agents, occupiers and others to identify issues to be addressed in any planning application in which noise and/or vibration will be an important consideration.

4.10.10 The Council will protect existing businesses and industrial uses in line with the Employment policies set out in this Plan. Businesses should not have unreasonable restrictions put on them because future noise sensitive uses are subsequently permitted adjacent to the business or within the surrounding area; this also includes changes of use. Therefore, proposed new noise sensitive developments should follow good acoustic design principles and incorporate adequate mitigation measures to ensure appropriate acoustic conditions in new developments.

#### **Light Pollution**

4.10.11 Though an important part of the urban environment, artificial lighting when not controlled, is poorly designed or positioned incorrectly can have a detrimental effect upon occupiers and residents. As part of the development process steps must be taken to ensure that the impact of artificial lighting is considered carefully.

#### **Odours and Fume Control**

4.10.12 Some commercial activities can have an impact upon the local environment; these impacts can include such things as odours, fumes, dust and steam. As part of the development process steps must be taken to ensure that any impact is considered carefully and that mitigation is in place to manage these types of emissions.

4.10.13 Applicants will be required to apply the Department for Environment, Food & Rural Affairs' (DEFRA) Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems.

#### **Land Contamination**

4.10.14 A wide range of uses have occurred in the borough throughout its history and there are areas where small scale industrial uses, such as factories, garages, manufacturing works and wharves were once present, and which may have left a legacy of contamination. All new development in the borough is envisaged to take place on previously developed land (i.e. brownfield sites) and therefore remediation is encouraged. The duty to ensure that a safe development is secured on a site that is affected by contamination rests with the developer.

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

4.10.16 To deliver this the Council will:

- require a desk top study and preliminary risk assessment, including an assessment of the site's history, potential contamination sources, pathways and receptors;
- where necessary, require a site investigation and detailed risk assessment in line with current best practice guidance, including where appropriate physical investigations, chemical testing and assessments of ground gas risks and risks to groundwater;
- where necessary, require a remediation strategy that sets out how any identified risks from the reports above are going to be addressed;
- where necessary, require a validation report once remediation has taken place, including evidence that demonstrates that risks from contamination have been controlled effectively; and
- require all above reports and investigations to be carried out by a competent person.

#### **Construction and demolition**

4.10.17 There is a need to ensure that occupiers are protected from environmental disturbances during the construction and demolition phase of major developments, and in particular during excavating and construction of subterranean developments such as basements.

4.10.18 The Council requires the submission of Construction Management Statements (CMS) for the types of developments as set out in the policy. In addition, the Council's Good Practice Guide on Basement Developments sets out guidance to ensure that problems relating to excavation and constructions of basements, such as highway/parking impacts, noise, dust, vibration and disturbance to neighbours, are avoided. Developers of basements are also expected to sign up to a Considerate Construction Scheme. To manage the environmental impacts and ensure that the Construction Management Statements are adhered to, the Council will seek a charge to the applicant/developer to cover the cost of monitoring the CMS. Where an applicant/developer uses the Council's Building Control services, a discount may be applied to this charge.

4.10.19 The Council may also consider requiring a Construction Logistics Plan (CLP) in areas that are subject to high traffic congestion to ensure that vehicles entering the site do not adversely impact on local traffic.

4.10.20 The Council may also require a management plan that sets out how developers monitor dust, noise and vibration, and where necessary take the appropriate action if issues arise.

4.10.21 It will also be necessary to control the hours of operation for noisy site works and the processes that would need to be followed in order to work outside these hours when and if required.

4.10.22 As part of the Council's commitment to better air quality, the Council will also request, through planning conditions, that the GLA Regulation relating to Non Road Mobile Machinery (NRMM) is imposed where necessary.

## 4.11 Subterranean Developments and Basements

### Policy LP 11

#### Subterranean developments and basements

A. The Council will resist subterranean and basement development of more than one storey below the existing ground level to residential properties or those which were previously in residential use.

B. Proposals for subterranean and basement developments will be required to comply with the following:

1. extend to no more than a maximum of 50% of the existing garden land or more than half of any other undeveloped garden area (this excludes the footprint of the original building);
2. Demonstrate the scheme safeguards the structural stability of the existing building, neighbouring buildings and other infrastructure, including related to the highway and transport; a Structural Impact Assessment will be required where a subterranean development or basement is added to, or adjacent to, a listed building.
3. use natural ventilation and lighting where habitable accommodation is provided;
4. include a minimum of 1 metre naturally draining permeable soil above any part of the basement beneath the garden area, together with a minimum 200mm drainage layer, and provide a satisfactory landscaping scheme;
5. demonstrate that the scheme will not increase or otherwise exacerbate flood risk on the site or beyond, in line with policy LP 21 Flood Risk and Sustainable Drainage;
6. demonstrate as part of a Construction Management Statement that the development will be designed and constructed so as to minimise the impact during construction and occupation stages (in line with the Local Environmental Impacts, Pollution and Land Contamination policy of this Plan);

C. Proposals for subterranean and basement developments, including extensions, as well as lightwells and railings, will be assessed against the advice set out in the Council's SPDs relating to character and design as well as the relevant Village Planning Guidance and the forthcoming SPD on Basements and Subterranean Developments. Applicants will be expected to follow the Council's Good Practice Guide on Basement Developments.

4.11.1 This policy applies to all new basement developments, including the construction or extension of one or more storeys below the prevailing ground level of a site or property. Subterranean and other basement developments are considered to be 'development' as defined by the Town and Country Planning Act 1990 as amended. Therefore, planning permission is required for the carrying out of basement developments. The Council has made two Article 4 Directions, which come into effect on 1 April 2018, to remove permitted development rights across the whole borough for basement and subterranean developments.

4.11.2 The development of basements in residential areas is becoming an increasingly popular way of gaining additional space in homes without the need to relocate to larger properties as well as for increasing the value of a property. The shortage of land for development as well as high land values in the borough, coupled with constraints imposed by heritage designations, has led to an increase in the number of applications for basement developments in recent years, whereby the vast majority of these relate to new, or extensions to existing basements, under existing dwellings within established residential areas.

4.11.3 The addition of basements to existing properties is considered to exacerbate the issue of rising residential land and property values in this borough, thus creating even more homes that are not affordable for local communities, and it also contributes to the loss of small family dwellings. Therefore, limiting the size and extent of a basement also ensures that the special character of this borough is preserved and that proposals do not lead to over-development or inappropriate intensification of existing properties.

4.11.4 Adding basements to existing properties, particularly multiple basements in a residential street or area, can significantly change the character as well as the social dynamics of an area, and can cause

significant impacts to living conditions of residents in neighbouring properties. Therefore, this policy restricts the depth of the basement excavation to a single storey where it relates to residential properties or those which were previously in residential use. In this policy, a 'single storey' is one that cannot be subdivided in the future to create additional floors (approximately 2.7 metres floor to ceiling height).

4.11.5 The policy acknowledges that basements and subterranean developments, including potentially those of more than one storey, can be constructed and used without adverse impacts on the living conditions and amenity of neighbours, provided that the proposal is appropriate for the character of the area and the site allows for appropriate access for plant and machinery to enable construction without adverse impacts.

4.11.6 In addition, this borough is characterised by low-rise residential areas that benefit from garden areas. Garden areas contribute significantly to the special character and uniqueness of this borough, including the character of Conservation Areas and settings of heritage assets. They also provide green oases and tranquil areas for residents as well as health benefits, and they contribute to the borough's green infrastructure network due to their biodiversity value. The importance of garden areas in this borough is also established by virtue of some being designated as Other Open Land of Townscape Importance. In addition, policy LP 39 in 9.6 'Infill, Backland and Backgarden Development' sets out a general presumption against backland development, particularly on garden land. While basements may not have a detrimental impact on the openness of an area, they can introduce a degree of artificiality into the garden area and restrict the range of trees and other planting. Therefore, this policy requires the retention of at least half of each garden to enable natural landscapes and the character to be maintained. In addition, this enables the treatment of surface water as close to its source as possible by retaining the infiltration capacity of the un-excavated area of the garden, thus ensuring that proposals do not increase surface water flows onto adjoining properties.

4.11.7 To support appropriate planting and vegetation as well as to allow for sustainable drainage, the Council will require a soil depth over any part of the basement beneath a garden of a minimum of 1 metre, together with a minimum 200mm drainage layer. This will allow for both a reduction in the amount as well as speed of surface water runoff, whereby the surface water drainage regime above the basement should be connected to the unaffected part of the garden area.

4.11.8 All basement and subterranean development should be installed with a pumped sewerage system to prevent flooding from back flow in public sewerage system as recognised in Part H of the Building Regulations. Issues of groundwater ingress to basement levels should be addressed by property owners. In areas at risk of flooding, policy LP 21 in 6.2 'Flood Risk and Sustainable Drainage' will be applied, which restricts certain types of basements and uses in accordance with the relevant flood zones, for example, restricted uses include self-contained units and bedrooms at basement level.

4.11.9 Basements and subterranean developments can suffer inundation from flood water entering the basement from above. The Flood Risk and Sustainable Drainage Policy LP 21 of this Plan sets out restrictions for basement developments in areas at risk of flooding. In addition, basements are vulnerable to groundwater entering through the walls and floors as well as service entries. Applicants should follow the BSI Code of Practice for protection of below ground structures against water from the ground (BS 8102:2009).

4.11.10 The impact of basement and subterranean construction, including issues relating to noise, dust, disturbance and structural stability of surrounding properties as well as the management of traffic, plant and equipment, is a growing concern in the borough, particularly in residential streets. It can affect the quality of life, amenity and living conditions as well as traffic and parking of nearby residents and local communities. In some instances, multiple excavations in a residential street can lead to detrimental impacts during the excavation and construction processes. While Planning has limited powers to control the construction processes, it does have an important role in protecting amenity and living conditions. This policy seeks to ensure that the amenity, living conditions and the health and wellbeing of nearby residents are protected by reducing the impacts from construction works, such as noise, vibration, soil removal and associated plant, machinery and heavy vehicles. Therefore, a Construction Management Statement (CMS), as set out in the Council's Local Validation Checklist, will be required for all types of basement and subterranean developments.

4.11.11 There are concerns over the impacts of basements and subterranean developments on the structural stability of the host building as well as of adjacent and potentially other nearby properties. Careful control is required to manage the detrimental impacts of basement and subterranean developments and to prevent long-term harm to amenity and living conditions of the local community.

4.11.12 Due to the potential irreversible detrimental harm to the historic integrity and risks to structural damage, particular care and attention needs to be taken where a subterranean or basement development could affect a designated heritage asset, such as a listed building or the associated garden land of a listed building. Proposals will also need to consider the potential archaeological impacts in Archaeological Priority Areas (APAs) where relevant. Therefore, where a subterranean development or basement is added to, or adjacent to, a listed building, a Structural Impact Assessment, including written confirmation that the applicant will pay for the structural report to be independently assessed, will be required.

4.11.13 The Council's Good Practice Guide on Basement Developments sets out guidance to ensure that problems relating to excavation and constructions of basements, such as highway/parking impacts, noise, dust, vibration and disturbance to neighbours, are avoided. It is expected that all developers for basement and subterranean works follow this guidance. In addition, developers and contractors of basements and subterranean developments are expected to sign up to a Considerate Construction Scheme. The Council strongly recommends for contractors undertaking basement construction to have membership of the Association of Specialist Underpinning Contractors (ASUC) or another suitable body. Applicants, and particularly contractors, should also follow the ASUC 'Guidelines on safe and efficient basement construction directly below or near to existing structures' (last updated in August 2016), which has been endorsed by the Health and Safety Executive.

4.11.14 Applicants wishing to undertake basement and subterranean developments are strongly advised to discuss their proposal with neighbours and other parties, who may be affected, by commencing Party Wall negotiations and discussing the scheme with the Council prior to the submission of a planning application.

## 5.1 Green Infrastructure

### 5.1 Green Infrastructure

#### Policy LP 12

##### Green Infrastructure

Green infrastructure is a network of multi-functional green spaces and green features, which provides multiple benefits for people, nature and the economy.

A. To ensure all development proposals protect, and where opportunities arise enhance, green infrastructure, the following will be taken into account when assessing development proposals:

- a. the need to protect the integrity of the green spaces and features that are part of the wider green infrastructure network; improvements and enhancements to the green infrastructure network are supported;
- b. its contribution to the wider green infrastructure network by delivering landscape enhancement, restoration or re-creation;
- c. incorporating green infrastructure features, which make a positive contribution to the wider green infrastructure network.

B. The hierarchy of open spaces, as set out in the table below, will be protected and used in accordance with the functions shown.

##### Public Open Space Hierarchy:

Type and size	Main function
<b>Regional Parks (400 ha+)</b>	Large areas, corridors or networks of open space, the majority of which will be publicly accessible and provide a range of facilities and features offering recreational, ecological, landscape, cultural or green infrastructure benefits. Offer a combination of facilities and features that are unique within London, are readily accessible by public transport and are managed to meet best practice quality standards.
<b>Metropolitan parks (60 – 400 ha)</b>	Large areas of open space that provide a similar range of benefits to Regional Parks and offer a combination of facilities at a sub-regional level, are readily accessible by public transport and are managed to meet best practice quality standards.
<b>District parks (20 – 60 ha)</b>	Large areas of open space that provide a landscape setting with a variety of natural features providing a wide range of activities, including outdoor sports facilities and playing fields, children’s play for different age groups and informal recreation pursuits as well as visual amenity.
<b>Local parks (2 – 20 ha)</b>	Providing for court games, children’s play, sitting out areas, visual amenity and nature conservation areas.
<b>Small local parks and open spaces (less than 2 ha)</b>	Gardens, sitting out areas, children’s play spaces or other areas of a specialist nature, including nature conservation areas as well as visual amenity.
<b>Pocket Parks (under 0.4 ha)</b>	Small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and play equipment as well as visual amenity.
<b>Linear open spaces (variable)</b>	Open spaces and towpaths alongside the Thames and other waterways; paths, disused railways; nature conservation areas; and other routes that provide opportunities for informal recreation. Often characterised by features or attractive areas which are not fully accessible to the public but contribute to the enjoyment of the space and visual amenity.

5.1.1 The borough is characterised by extensive areas of open land, designated as Green Belt, Metropolitan Open Land, as well as the borough's rivers and their corridors, which link across borough boundaries and have a strategic function in southwest London, Greater London and beyond. The borough also benefits from highly significant historic landscapes, including those on the Historic England's national Register of Parks and Gardens, all of which make a significant contribution to the borough's green infrastructure network. The need to protect the historic significance of the borough's exceptional landscapes is set out in Chapter 4: Local Character and Design. In addition, there are many smaller pieces of open land, including land designated as Other Open Land of Townscape Importance, as well as non-designated land, all of which are of value to the local area and enhancement of its environment and the wider green infrastructure network to ensure the borough remains an attractive area for people to live, work and visit to enjoy their heritage and leisure time.

5.1.2 The green spaces and green features that contribute to and make up the overall green infrastructure network range from borough-wide and strategic features such as parks, watercourses, woodlands to local features such as playgrounds, sports pitches, allotments, public open spaces, trees, woodlands, private gardens and other green spaces used for recreational purposes. There are also other features such as highway verges, railway embankments as well as site-specific elements such as green roofs and green walls that are considered to be part of the wider green infrastructure network.

5.1.3 Housing delivery, and infrastructure required to support it, is expected to be met without compromising the green infrastructure network and there is a presumption against the loss of, or building on, greenfield sites. It is acknowledged that there is current recreational pressure on existing green infrastructure, including nationally and internationally designated areas such as Richmond Park and Bushy and Home Park, and residential development is likely to exacerbate this pressure.

5.1.4 The provision of multi-functional green infrastructure, including urban greening, green corridors and green roofs have biodiversity as well as social, health, recreational, flood storage and cooling benefits, which can reduce urban heat islands, manage flooding and help species adapt to the likely effects of climate change as well as contributing to a pleasant environment. Green infrastructure can support healthier lifestyles by providing green routes for walking and cycling, and green spaces for recreation, exercise and play.

5.1.5 The presence of a network of green spaces may reduce the likelihood of flooding by allowing water to permeate through the ground. Green infrastructure can also be designed to act as flood storage areas, holding large volumes of water in temporary ponds to protect built up areas from flooding.

5.1.6 The Mayor of London's All London Green Grid SPG seeks to ensure that in and through Local Plan policies, green infrastructure needs are planned and managed to realise the current and potential value of open space to communities and to support delivery of the widest range of linked environmental and social benefits. The two All London Green Grid areas within this borough are the Arcadian Thames, and the River Colne and Crane Area. Each area has its own Framework and list of associated projects. The Council will work with partners to help realise the vision for the Green Grid and the objectives of the relevant area frameworks.

5.1.7 The creation and enhancement of green infrastructure helps to:

- create attractive and accessible places for people to enjoy direct and regular contact with the natural environment;
- strengthen links between urban areas and their surrounding open spaces, and bring the natural world into a neighbourhood, with benefits for both individual and community health and well-being.

5.1.8 Many of the components of green infrastructure, such as parks and play spaces, also relate directly to place-making and enhancing local character. At a wider scale, green infrastructure can contribute to local identity and landscape character.

5.1.9 The public open space hierarchy as set out in the policy follows the categorisation of the London Plan and provides for a range of open spaces for formal and informal recreation. Many of the borough's parks and open spaces are of 'regional' or 'metropolitan' importance in providing opportunities for recreation, and

many have historic significance, biodiversity value or can be regarded as areas of relative tranquillity. The open space network, including the Blue Ribbon network such as the River Thames and River Crane corridors, as well as the links in between provide the natural green infrastructure that performs a wide range of functions for residents, visitors, biodiversity and the economy. It is important to recognise that the borough's parks and open spaces provide not only recreational opportunities for those that live and work in this borough, but also for local communities and residents in neighbouring and other London boroughs, thus providing a green lung for southwest London.

5.1.10 A network that includes parks, playing fields, open spaces, woodlands, trees, allotments and private gardens contributes to ecological connectivity to overcome habitat fragmentation and increases the ability of the natural environment to adapt to climate change.

5.1.11 There may be opportunities to incorporate or retrofit elements of green infrastructure on all development sites. Where appropriate, these can be realised through for example :

- green roof systems and roof gardens,
- green walls to provide insulation or shading and cooling,
- swales integrated as part of streetscape and traffic calming schemes or neighbourhood play areas, and
- new tree planting or altering the management of land associated with transport corridors.

## 5.2 Green Belt, Metropolitan Open Land and Local Green Space

### Policy LP 13

#### Green Belt, Metropolitan Open Land and Local Green Space

##### Green Belt and Metropolitan Open Land

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

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

B. It will be recognised that there may be exceptional cases where inappropriate development, such as small scale structures for essential utility infrastructure, may be acceptable.

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

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

##### Local Green Space

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

5.2.1 The fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence. Metropolitan Open Land (MOL) is unique to London and protects strategically important open spaces within the built environment. This policy applies equally to Green Belt or Metropolitan Open Land. In addition, paragraphs 79-92 of the NPPF on Green Belts applies equally to MOL. 5.2.2 MOL is open land or water, either publicly or privately owned, with or without public access. MOL, as shown on the Policies Map, plays an important strategic role as part of the borough's and London-wide multi-functional green infrastructure network and improvements in its overall quality and accessibility are encouraged. Green chains, including footpaths and open spaces that they link, are important to London's green infrastructure network, providing opportunities for recreation and biodiversity, and are therefore designated as MOL due to their London-wide strategic importance.

5.2.3 National and regional policies, including this policy, apply to the borough's areas designated as Green Belt<sup>1</sup>, as shown on the Policies Map. National guidance sets out the functions of the Green Belt, its key characteristics and acceptable uses.

5.2.4 The purpose of this policy is to safeguard this open land and protect and retain it in predominately open use. There is a presumption against inappropriate development in the Green Belt or MOL, and inappropriate development by definition, is harmful to the Green Belt or MOL and should not be approved except in very special circumstances. However, the policy also recognises that there may be exceptional cases where inappropriate development could be acceptable, such as small scale structures for essential utility infrastructure. Water, waste water treatment and sewage treatment plants, including any associated facilities, are considered to be essential utility infrastructure and facilities. New uses will only be considered if they are by their nature open or depend upon open uses for their enjoyment and if they conserve and enhance the open nature, character and biodiversity interest of MOL.

5.2.5 Where a development proposal affects designated Green Belt or MOL, the applicant is required to submit an assessment that compares the footprint and floorspace of existing structures and buildings with the footprint and floorspace of the proposed development. This will enable the Council to make an informed judgement in relation to the overall impact on, and potential loss of, designated Green Belt or MOL. Any increase in either footprint or floorspace within designated Green Belt or MOL will need to be fully justified by the applicant.

5.2.6 Development that involves the loss of Green Belt or MOL in return for the creation of new open space elsewhere will not be supported. However, where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals that deliver significant wider public benefits, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent to or improved in terms of quantum, quality and openness. The applicant will need to demonstrate this as part of the justification that 'very special circumstances' may exist.

5.2.7 Enhancement to the Green Belt or MOL for example by landscaping, removal or replacement of inappropriate fencing and screening, and reduction of the visual impact of traffic or car parking as well as opening up views into and out of the Green Belt or MOL will be encouraged. Where possible, opportunities to increase the Green Belt's or MOL's potential for wildlife should be maximised.

5.2.8 Local Green Space, to be identified on the Policies Map, is green or open space which has been demonstrated to have special qualities and hold particular significance and value to the local community which it serves. There are no areas designated yet within the borough. New areas of Local Green Space can only be designated when a plan is being prepared or reviewed.

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<sup>1</sup> The land at Twickenham and Fulwell golf courses is held under "The Green Belt (London and Home Counties) Act, 1938. An Act to make provision for the preservation from industrial or building development of areas of land in and around the administrative county of London." Under this Act owners are required to request permission from the Secretary of State to build on or dispose of this land. This requirement is separate from and in addition to any requirements for planning permission. Most of this land is protected in the Borough's Local Plan and London Plan by its designation as Metropolitan Open Land under Policy LP 13 and Policy 7.17 respectively. However, it is not covered by any planning policy Green Belt designation in the terms described by the NPPF, London Plan and Local Plan.

5.2.9 In line with the NPPF, managing development within a Local Green Space should be consistent with policy for Green Belt. Development, which would cause harm to the qualities of the Local Green Space, will be considered inappropriate and will only be acceptable in very special circumstances where benefits can be demonstrated to significantly outweigh the harm.

5.2.10 The following criteria are taken into account when defining Local Green Space:

- The site is submitted by the local community;
- There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;
- The site is not land allocated for development within the Local Plan;
- The site is local in character and is not an extensive tract of land.

### 5.3 Other Open Land of Townscape Importance

#### Policy LP 14

##### Other Open Land of Townscape Importance

Other open areas that are of townscape importance will be protected in open use, and enhanced where possible.

It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria will be taken into account when assessing whether development is appropriate:

- a. it must be linked to the functional use of the Other Open Land of Townscape Importance; or
- b. it can only be a replacement of, or minor extension to, existing built facilities; and
- c. it does not harm the character or openness of the open land.

Improvement and enhancement of the openness or character of other open land and measures to open up views into and out of designated other open land will be encouraged.

When considering developments on sites outside designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account.

5.3.1 The purpose of this policy is to safeguard open land of local importance and ensure that it is not lost to other uses without good cause. Areas designated as Other Open Land of Townscape Importance (OOLTI) form an important part of the multi-functional network of Green Infrastructure and they can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. New areas for OOLTI designation can only be identified when a plan is being prepared or reviewed. The existing designated areas are shown on the Policies Map.

5.3.2 In some parts of the borough, open areas, including larger blocks of back gardens, act as pockets of greenery of local rather than strategic significance. Many of these are of townscape importance, contributing to the local character and are valued by residents as open spaces in the built up area. Green oases are particularly important in areas of higher density development including in the borough's centres.

5.3.3 [deleted]

5.3.4 OOLTI should be predominantly open or natural in character. The following criteria are taken into account when defining OOLTI (note that the criteria are qualitative and not all need to be met):

- Contribution to the local character and/or street scene, by virtue of its size, position and quality.
- Value to local people for its presence and openness.
- Immediate or longer views into and out of the site, including from surrounding properties.

- Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in [5.1 'Green Infrastructure'](#).
- Value for biodiversity and nature conservation and meets one of the above criteria.

5.3.5 [deleted]

5.3.6 Where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals, or for community and social infrastructure including educational uses, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness.

5.3.7 Protecting and opening up views into and out of designated OOLTI is encouraged because of the contribution they can make to the distinctive character of an area and the benefits to all.

## 5.4 Biodiversity

### Policy LP 15

#### Biodiversity

A. The Council will protect and enhance the borough's biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats. Weighted priority in terms of their importance will be afforded to protected species and priority species and habitats including National Nature Reserves, Sites of Special Scientific Interest (SSSI) and Other Sites of Nature Importance as set out in the Biodiversity Strategy for England, and the London and Richmond upon Thames Biodiversity Action Plans. This will be achieved by:

1. protecting biodiversity in, and adjacent to, the borough's designated sites for biodiversity and nature conservation importance (including buffer zones), as well as other existing habitats and features of biodiversity value;
2. supporting enhancements to biodiversity;
3. incorporating and creating new habitats or biodiversity features, including trees, into development sites and into the design of buildings themselves where appropriate; major developments are required to deliver net gain for biodiversity, through incorporation of ecological enhancements, wherever possible;
4. ensuring new biodiversity features or habitats connect to the wider ecological and green infrastructure networks and complement surrounding habitats;
5. enhancing wildlife corridors for the movement of species, including river corridors, where opportunities arise; and
6. maximising the provision of soft landscaping, including trees, shrubs and other vegetation that support the borough-wide Biodiversity Action Plan.

B. Where development would impact on species or a habitat, especially where identified in the relevant Biodiversity Action Plan at London or local level, or the Biodiversity Strategy for England, the potential harm should:

1. firstly be avoided (the applicant has to demonstrate that there is no alternative site with less harmful impacts),
2. secondly be adequately mitigated; or
3. as a last resort, appropriately compensated for.

5.4.1 Biodiversity is promoted through the designation of sites and areas (statutory and non-statutory), including links and corridors, that are of nature conservation and biodiversity value. The aim of this policy is to protect and enhance the biodiversity in, and adjacent to, the borough's designated sites as well as other non-designated existing habitats and features of biodiversity value. The borough's open land and rivers, including the Thames and its islands, the River Crane, Beverley Brook, Duke of Northumberland River, Longford River and Whitton Brook, including the river banks, are vital elements that support the borough's biodiversity. It is important that all these areas, and where possible green linkages between them, are protected.

5.4.2 The Richmond Biodiversity Action Plan (BAP) sets out the Sites of Metropolitan, Borough and Local Importance for Nature Conservation (SINC) in the borough. The level of weight given to protected sites should be commensurate to their importance and the contribution that they make to wider ecological and green infrastructure networks. The highest protection should be given to sites with existing or proposed international designations, (i.e. Special Areas of Conservation, SACs; Special Protection Areas, SPAs; Ramsar Sites) and national designations (Sites of Special Scientific Interest, SSSIs; National Nature Reserves, NNRs). Strong protection should be given to sites of metropolitan and borough-wide importance, and commensurate protection should be given to sites of local importance.

5.4.3 Where development proposals could affect or harm a European Protected Species or its habitat, the application will be assessed on the three tests of the Habitats Regulations, and should planning permission be approved, then the developer is required to independently obtain a licence from Natural England. Where ecological surveys and assessments are undertaken, developers should make all ecological data available to Greenspace Information for Greater London (GiGL) – the capital's environmental records centre.

5.4.4 Biodiversity does not only enhance and enrich the borough's landscapes and wildlife, but it also makes a significant contribution to the distinctiveness of this unique borough, providing a sense of place, cultural heritage, tranquillity as well as opportunities for recreation and a healthier lifestyle. In addition, protecting and enhancing biodiversity, including the provision of new habitats and features, increases the resilience of our ecosystems and helps the physical environment to change and adapt to different stresses. Biodiversity, including the wider ecological and green infrastructure networks, play a crucial role in adapting to the effects of climate change.

5.4.5 This policy recognises that biodiversity interest is not just confined to designated nature conservation areas. Outside designated areas, including on previously developed land or brownfield land, there is an abundance of biodiversity features and habitats, including trees, hedges, wildlife gardens, allotments, ponds, green roofs, living walls, nesting and roosting boxes and bat boxes.

5.4.6 The promotion of nature conservation should be treated as integral to any new development scheme, not as an 'add-on'. Layout, design, buildings, external lighting and landscaping schemes should take account of existing biodiversity features and habitats. New development should include new or enhanced features and habitats, design (such as green roofs) and landscaping (including trees) that promote biodiversity, including provision for their management. These features must also be protected during construction works, and this may be subject to a planning condition as will subsequent maintenance and monitoring.

5.4.7 Therefore, the Council expects developments to incorporate new biodiversity features and habitats into the design of buildings themselves as well as in appropriate design and landscaping schemes of new and/or redevelopments (including surrounding areas where appropriate) with the aim to attract wildlife and promote biodiversity where possible. This is particularly important in areas with less access to areas of nature conservation importance. Therefore, proposals should seek to include:

- habitat restoration, re-creation and expansion;
- improved links between existing sites;
- buffering of existing important sites;
- new biodiversity features within development; and
- securing management for long term enhancement.

5.4.8 The Richmond BAP and other relevant local strategies set out measures to protect and enhance the borough's biodiversity resource by improving the quality of the local environment through practical management, habitat creation and protection of important wildlife sites and connectivity. The implementation of the Richmond BAP is an important vehicle to improving the biodiversity of the borough.

5.4.9 Any schemes for incorporating new biodiversity features or creating new habitats should take account of site constraints (such as utility infrastructure) and consider the use of native species. The species suitability and their adaptability to the likely effects of climate change need to be taken into account. Guidance on the use of native species and climate change can be found in the relevant BAPs, the Mayor of London's Biodiversity Strategy and the London Tree and Woodland Framework.

## 5.5 Trees, Woodlands and Landscape

### Policy LP 16

#### Trees, Woodlands and Landscape

A. The Council will require the protection of existing trees and the provision of new trees, shrubs and other vegetation of landscape significance that complement existing, or create new, high quality green areas, which deliver amenity and biodiversity benefits.

B. To ensure development protects, respects, contributes to and enhances trees and landscapes, the Council, when assessing development proposals, will:

#### Trees and Woodlands

1. resist the loss of trees, including aged or veteran trees, unless the tree is dead, dying or dangerous; or the tree is causing significant damage to adjacent structures; or the tree has little or no amenity value; or felling is for reasons of good arboricultural practice; resist development that would result in the loss or deterioration of irreplaceable habitat such as ancient woodland;
2. resist development which results in the damage or loss of trees that are considered to be of townscape or amenity value; the Council will require that site design or layout ensures a harmonious relationship between trees and their surroundings and will resist development which will be likely to result in pressure to significantly prune or remove trees;
3. require, where practicable, an appropriate replacement for any tree that is felled; a financial contribution to the provision for an off-site tree in line with the monetary value of the existing tree to be felled will be required in line with the 'Capital Asset Value for Amenity Trees' (CAVAT);
4. require new trees to be of a suitable species for the location in terms of height and root spread, taking account of space required for trees to mature; the use of native species is encouraged where appropriate;
5. require that trees are adequately protected throughout the course of development, in accordance with British Standard 5837 (Trees in relation to design, demolition and construction – Recommendations).

The Council may serve Tree Preservation Orders or attach planning conditions to protect trees considered to be of value to the townscape and amenity and which are threatened by development.

#### Landscape

1. require the retention of important existing landscape features where practicable;
2. require landscape design and materials to be of high quality and compatible with the surrounding landscape and character; and
3. encourage planting, including new trees, shrubs and other significant vegetation where appropriate.

5.5.1 The abundance of trees is a great asset to the borough's unique environment. Trees as well as other significant vegetation and landscape are key components of the borough's ecological and Green Infrastructure network. They soften the hardness of buildings and streets, add life, colour and character to the urban landscape and enhance open spaces and the riverside landscape. Trees and other planting, including contiguous gardens and green oases, deliver multiple benefits; they provide an important habitat for wildlife, reduce levels of carbon dioxide and airborne pollutants such as nitrogen dioxide and harmful particulates (such as PM10's and PM2.5's); dampen noise from traffic and congestion; increase the supply of oxygen, provide shade for streets, open areas and parks as well as for buildings. Trees and other landscape features can help areas to adapt to the likely effects of climate change; for example, they have a cooling effect and contribute to the reduction of urban heat islands by regulating local temperature extremes, which is important due to projected future increases in temperature as a result of climate change. In addition, they can assist in reducing surface water run off rates and flash floods during heavy rainfall events through absorption and infiltration.

5.5.2 Many trees in the borough are already protected by Tree Preservation Orders (TPOs) or as a result of their location in Conservation Areas. The Council will consider making further TPOs where trees have been assessed to be of value to the townscape and amenity and which are threatened by development.

5.5.3 Development proposals are required to retain and protect existing trees, and minimise any impacts on trees, shrubs and other significant vegetation, including through the provision of sufficient space for the crowns and root systems of existing and proposed trees and their future growth. Developer contributions towards trees within the public realm may be required where appropriate (see the Council's Planning Obligations SPD).

5.5.4 It is important that species are chosen that are appropriate to the scale of their surroundings and public amenity, and guidance should be sought from relevant experts. The Council encourages the use of native species where appropriate. However, it is acknowledged that native species may not always be the most suitable choice, such as in certain historic landscapes, where there is an existing positive character of distinctive non-native trees. There may also be other particular situations where the use of non-native species may be beneficial. In addition, the Council encourages schemes that include large trees, where appropriate, as evidence suggests that the larger the tree, the greater the benefits to both amenity and ecosystems.

5.5.5 An appropriate replacement for any tree that is felled will be required on-site where practicable. Where this is not possible, the Council will require a financial contribution to provide an off-site street tree. The Council will use the methodology set out in 'Capital Asset Value for Amenity Trees' (CAVAT) for calculating the monetary value and/or compensation where a tree is felled or damaged.

5.5.6 The term 'landscape' is taken to refer to the design of all space between buildings and includes walls and boundaries, paving as well as planting. It refers to both 'soft' as well as 'hard' landscape and materials. These considerations are often vital in creating an appropriate setting to new developments and in integrating new development to its surroundings. Landscape design must form an integral part of any proposal and needs to be considered in relation to the development as a whole at the start of a project. Landscape design and where appropriate tree planting as well as other green infrastructure elements such as green roofs and green walls, will also need to contribute to and complement the existing character of an area as set out in the relevant Village Planning Guidance SPD. Guidance on the retention and planting of trees in new development can be found in the report Residential Development and Trees published by the Woodland Trust.

## 5.6 Green Roofs and Walls

### Policy LP 17

#### Green roofs and walls

Green roofs and/or brown roofs should be incorporated into new major developments with roof plate areas of 100sqm or more where technically feasible and subject to considerations of visual impact. The aim should be to use at least 70% of any potential roof plate area as a green / brown roof.

The onus is on an applicant to provide evidence and justification if a green roof cannot be incorporated. The Council will expect a green wall to be incorporated, where appropriate, if it has been demonstrated that a green / brown roof is not feasible.

The use of green / brown roofs and green walls is encouraged and supported in smaller developments, renovations, conversions and extensions.

5.6.1 Green roofs are an essential sustainable design consideration and can take many forms in order to maximise their benefits in a given location. Vegetated roofs have many benefits, including the following:

- provision of Sustainable Drainage Systems (SuDS) to avoid rapid rain run-off into drains and rivers and improve water quality;
- adaptation to climate change and reduction in urban heat island effects (i.e. aiding cooling);
- mitigation of climate change and carbon savings (i.e. aiding energy efficiency);
- enhancement of biodiversity and provision of important refuges for wildlife in urban areas;
- provision of green space and potentially accessible roof space;
- improvements to visual appearance;
- enhanced roof and sound insulation properties and resilience of the building;
- enhanced roof lifespan by protecting underlying waterproofing systems;
- reduction in air and noise pollution; and
- growing food.

5.6.2 Brown roofs are similar to green roofs in that they share many of the same benefits, but the overriding aim is to encourage biodiversity and to reinstate habitats conducive to local species on the roof. They can maximise the number of species living on the rooftop or provide a habitat for threatened species living on a brownfield site that a building is being constructed on.

5.6.3 Green roofs, as well as brown roofs, are of importance in this borough because of the following:

- The borough is very susceptible to surface water flooding and such roofs can make an important contribution to reducing surface run-off volumes and rates, and reduce flash flooding.
- There may be higher temperatures in the borough in the future due to climate change. The evaporation and evapotranspiration from such roofs cools the air. The combined effect of a cooler surface at roof level coupled with better thermal insulation that reduces the need for air conditioning during periods of higher than normal temperatures reduces and counteracts the urban heat island effect.
- New living roofs, particularly brown roofs, could provide new wildlife habitats in areas which are currently deficient. They could create new links to the borough's and London's network of habitats and green infrastructure and could provide additional habitats for protected, rare or important species, which can in turn help to meet the targets in the UK, Regional and Richmond upon Thames Biodiversity Action Plans.

- Green roofs could contribute to the overall amount of greenness in the borough. In particular, such roof space could also be made accessible, which can be of benefit for residents who do not have access to private gardens. Proposals for accessible green roof space must conform to other policies in this Plan, to ensure they are adequately designed and safe and do not adversely affect amenity and living conditions.

5.6.4 A green roof is defined as having a minimum of 70% soil/vegetation coverage, with a minimum substrate depth of 85mm, and a maximum of 30% hard surface. Green roofs are not roof terraces. Green roofs can be installed on any pitch of roof; however, as the pitch increases, additional specific design measures will be required in order to retain the substrate across the roof surface, which will result in increased costs. The appearance of the green roof also needs to be compatible with the surrounding area. The aim should be to use at least 70% of any potential roof plate area as a green roof; that is, the total roof plate area including space for renewable energy solutions such as photovoltaic panels and solar thermal but excluding non-green roof solutions such as air conditioning units. The Council will take into account relevant viability information.

5.6.5 Green roofs do not preclude the use of renewable energy technologies. Green roofs and photovoltaic panels or solar thermal units can be used together and green roofs may increase the efficiency of solar photovoltaic panels by regulating temperature. An applicant will have to provide evidence and justification if a green roof cannot be incorporated for major development proposals with roof plate areas of 100sqm or more.

5.6.6 A green wall, which is vegetation over a building's vertical surfaces, may be an alternative if green roofs cannot be incorporated, provided they are properly designed and maintained. Green walls, also often referred to as vertical gardens, can have a number of design, ecological and performance benefits, including:

- enhancing a building's appearance, adding a new aesthetic dimension and visual benefits, screening or disguising a visually intrusive structure or building, softening of harsh urban environments, including deterring graffiti where this may be a problem;
- regulating local temperatures, reducing the urban heat island effect and keeping the building cool, thus contributing to a reduction in carbon dioxide emissions;
- prolonging the life of a building's façade by acting as a shield or barrier from the elements and light;
- providing a wildlife habitat in an urban area;
- reducing noise by adding an additional layer of insulation and absorbing sounds such as from traffic;
- contributing to improving air quality both by absorbing carbon dioxide and releasing oxygen as well as trapping dust and other pollutants.

5.6.7 The design and operational needs of a green roof or wall should not place undue stress on water supply and other natural resources. Extensive green roofs, which are suitable for flat and pitched roofs and also for retrofitting, with low maintenance and no requirement for irrigation once established, are particularly encouraged. All green and brown roof systems should use a high percentage of recycled products.

5.6.8 The provision of green roofs does not negate the need to make adequate open space provision on the ground. Any proposals for accessible green roofs need to be designed for security and safety and not adversely affect neighbouring properties.

5.6.9 The use of green roofs and green walls in smaller developments, renovations, conversions, extensions and retrofitting is encouraged and supported, where opportunities arise.

5.6.10 Conditions will be used where appropriate to secure the proper installation, maintenance and responsibility for green roofs and walls.

## 5.7 River Corridors

### Policy LP 18

#### River corridors

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

#### Thames Policy Area

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

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

#### Public Access

C. All development proposals alongside or adjacent to the borough's river corridors should:

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

#### River Thames public riverside walk

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

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

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

This will be achieved by:

1. resisting redevelopment of existing river-dependent or river-related industrial and business uses to non-river related employment uses or residential uses unless it can be demonstrated that no other river-dependent or river-related use is feasible or viable;
2. ensuring development on sites along the river is functionally related to the river and includes river-dependent or river-related uses where possible, including gardens which are designed to embrace and enhance the river, and be sensitive to its ecology;
3. requiring an assessment of the effect of the proposed development on the operation of existing river-dependent uses or riverside gardens on the site and their associated facilities on- and off-site;

or requiring an assessment of the potential of the site for river-dependent uses and facilities if there are none existing;

4. ensuring that any proposed residential uses, where appropriate, along the river are compatible with the operation of the established river-related and river-dependent uses;
5. requiring setting back development from river banks and existing flood defences along the River Thames.

5.7.1 The borough's rivers, their banks and surrounding environments contribute to the special and distinctive character of the borough. The rivers are important components of the wider Green Infrastructure network and provide valuable habitats for wildlife including recreational opportunities for local communities.

5.7.2 The River Thames runs for 34 kilometres through the borough and forms part of the Blue Ribbon Network. This borough is the only one in London that is intersected by the Thames, therefore benefiting from one of the longest river frontages and associated recreational areas, which gives the borough a unique and historic landscape character. The River Thames connects a variety of landscapes and townscapes, including open stretches of woodland, parks and open spaces, wildlife habitats, important heritage assets as well as industrial and urban waterfronts.

5.7.3 The borough's Blue Ribbon network does not only contain the River Thames, but other important rivers and waterbodies, including the River Crane, Duke of Northumberland River, Longford River and Beverley Brook. These are also identified as green grid areas in the Mayor of London's All London Green Grid SPG, highlighting the diversity of the borough's green and blue landscapes and environments.

5.7.4 The River Crane is an important river corridor, which runs for 30 kilometres from Harrow through Twickenham and St Margarets to the Thames at Isleworth, and which has benefited from significant environmental improvements. Where appropriate, developments alongside and adjacent to the River Crane should contribute to the overarching aim of creating a new metropolitan park that provides a continuous, accessible link between Hounslow Heath and the River Thames, incorporating river restoration works along the lower Crane, including a long distance footpath, improved access for surrounding communities and an enhanced wildlife corridor. This applies in particular to the following development sites that are considered to be within the River Crane and the connecting Duke of Northumberland River corridor: Richmond upon Thames College, Twickenham Station, Greggs bakery, The Stoop, Twickenham Stadium, the Depot and Mereway Day Centre.

5.7.5 Setting back built development from the borough's rivers, including riverbanks and existing flood defences will be encouraged and supported. This will not only allow for the maintenance and future upgrading of the flood defences, but provide opportunities to enhance biodiversity as well as increase and open up public access alongside and to the river. The Council, in conjunction with the Environment Agency, will require a buffer zone of 8 metres on the borough's rivers (including the fluvial Thames) and 16 metres for the tidal Thames.

[New para] The Tidal Thames within the London Borough of Richmond is within the South East Inshore Marine Plan area. A plan for this area will be prepared by the Marine Management Organisation at a future date. Until the marine plan is adopted, the Marine Policy Statement takes precedence and requires that all authorisation or enforcement decisions are made in accordance with the said Statement for any planning activity below mean high water springs, including sections of a tidal river.

### **Thames Policy Area**

5.7.6 Development proposals within the Thames Policy Area, where appropriate, should ensure that their use and design establishes a positive relationship with the river. Account should be taken of the special and varied characters of the River Thames as set out in detail in the Thames Landscape Strategy (from Hampton to Kew) and the Thames Strategy (from Kew to Chelsea) as well as the Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans.

5.7.7 Developments alongside and adjacent to the River Thames should:

- protect, and where appropriate enhance, the individuality and character of the reach;
- establish a relationship with the river and address the river as a frontage;
- open up views and vistas to allow the public to appreciate the riverside setting;
- protect and, where opportunities arise, enhance existing access points, including river-dependent structures such as bridges, jetties, piers and slipways;
- allow for public access for pedestrians and cyclists, and where appropriate boats, to enable local communities to gain access to the river and enjoy the riverside;
- ensure appropriate land uses enable the public to enjoy the riverside setting, especially at ground level in buildings fronting the river where possible.

### **Public access**

5.7.8 There is public access to much of the riverbank in the borough either by towpath or riverside open spaces. Public access to the river, riverside and the foreshore should be provided as part of new developments adjacent to and alongside the borough's rivers where feasible and appropriate. Existing public access to the borough's rivers should be retained and opportunities should be taken to improve and enhance access arrangements, including creating inclusive access, where possible.

5.7.9 There are parts of the borough where public access to the rivers, including the River Thames, is limited, such as from Kingston Bridge to Twickenham. There is a long-standing strategy and aim to provide a continuous public riverside walk along both sides of the River Thames. The Council has secured the opportunity to provide considerable sections of public riverside walk by requiring a public path to be provided wherever a development adjoins the River Thames. Therefore, all developments adjacent to the River Thames are required to contribute to the public riverside walk along the River Thames, even if there is currently no public access to the route on either side of the development site. The Council expects developers, particularly on major development sites, to work with adjoining landowners where land ownership issues may prevent the aim of achieving public access; this is to ensure the river and the riverside can be enjoyed by the wider public and local community.

5.7.10 The river corridors, including their associated parks and open spaces, provide important opportunities for recreation and healthy lifestyles. Therefore, all major development proposals adjacent to the borough's rivers should provide through-site links to the riverside to enable the public access to the riverside environment.

5.7.11 Public access to, and alongside, the rivers, for pedestrians, cyclists and boats where appropriate, will be secured through Planning Obligations.

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

5.7.12 River-dependent uses are those whose primary purpose is dependent on the river for siting and function. They are defined as an activity which can only be conducted on, in, over or adjacent to the river because the activity requires direct access to the river and which involves, as an integral part of the activity, the use of the water. River-dependent structures which may in exceptional circumstances be permitted to encroach into the river and its foreshore include tunnels, bridges, jetties, piers, and slipways.

5.7.13 River-dependent facilities, such as boatyards and sheds, public and private wharves, slipways, wet and dry docks and cranes, as well as piers, pontoons, jetties and stairs are essential for the survival of the river-related industry and to support the continued active use of the river. Therefore, they will be protected so they are not lost to other uses. The Council supports in principle the safeguarding of the sites identified in *The Mayor's Assessment of Boatyard Facilities on the River Thames (2007)*.

5.7.14 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 they also play a role in the local economy. This also includes uses and structures that support water-based

passenger, tourism and freight transport as well as water-based sport and leisure activities, including visitor and pleasure craft moorings. River-related uses may also include a garden or park specifically designed to enhance public appreciation and public access to the river.

5.7.15 The Council will therefore protect the existing river-related industrial and business uses and ensure they are not lost to other uses. In addition to their functional roles, river-related uses make an irreplaceable contribution to the character and contrasts of the individual reaches through the activity, distinctive building forms, varied visual interest and historical link they provide. The redevelopment of existing river-related industrial and business sites to residential and non river-related business uses will not be permitted unless it can be demonstrated that such uses are not viable or feasible. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for river-dependent and river-related uses over a minimum period of two continuous years in accordance with the approach set out in Appendix 5.

## 5.8 Moorings and Floating Structures

### Policy LP 19

#### Moorings and Floating Structures

A. There is a presumption against new proposals for houseboats, including extensions to existing houseboats, and other moorings or floating structures designed for permanent residential use.

B. A mooring or other floating structure will be supported if it complies with the following criteria:

1. it does not harm the character, openness and views of the river, by virtue of its design and height;
2. the proposed use is river-dependent or river-related;
3. there is no interference with the recreational use of the river, riverside and navigation; and
4. the proposal is of wider benefit to the community.

5.8.1 The River Thames is designated Metropolitan Open Land and therefore the character and openness of the river will be safeguarded from inappropriate uses. Whilst it is acknowledged that existing houseboats, moorings and other floating structures are an established part of the river scene, houseboats, by definition, are an inappropriate use within Metropolitan Open Land. They can cause problems because of infrastructure provision (such as sewage, waste, water, secure storage and washing), provision of access, servicing and car parking, obstruction to navigation and public access to the river, interference with the recreational use of the river and its foreshores and impacts on the views, local character and amenity of the river. Therefore, new proposals for houseboats, including extensions to existing houseboats and other moorings or floating structures designed for permanent residential uses will be resisted.

5.8.2 Whilst the Council has limited powers regarding the appearance of boats, planning permission is required for new moorings and change of use of the river bank and river bed for permanent mooring. It should be noted that the Council introduced a Moorings Bylaw in 2015. As such, a criminal offence will be committed if any vessel is moored for longer than permitted without the written consent of the Council. The Environment Agency and the Port of London Authority require houseboats to be licensed and can object to them on navigational grounds. The Environment Agency is also able to object to houseboats on flood risk and biodiversity grounds.

## 6 Climate Change and Sustainable Design

### 6.1 Climate Change Adaptation

#### Policy LP 20

##### Climate Change Adaption

A. The Council will promote and encourage development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property.

B. New development, in their layout, design, construction, materials, landscaping and operation, should minimise the effects of overheating as well as minimise energy consumption in accordance with the following cooling hierarchy:

1. minimise internal heat generation through energy efficient design
2. reduce the amount of heat entering a building in summer through shading, reducing solar reflectance, fenestration, insulation and green roofs and walls
3. manage the heat within the building through exposed internal thermal mass and high ceilings
4. passive ventilation
5. mechanical ventilation
6. active cooling systems (ensuring they are the lowest carbon options).

C. Opportunities to adapt existing buildings, places and spaces to the likely effects of climate change should be maximised and will be supported.

6.1.1 Climate change adaptation refers to the ability of a system to adjust to climate change (including climate variability and extremes), to take advantage of the opportunities it presents to cope with the consequences. This relates to the adjustment in natural or human systems to a new or changing environment and the understanding of how individuals, groups and natural systems can prepare for and respond to changes in climate.

6.1.2 Successful adaptation to climate change will depend on how well the issue is recognised and integrated into all decision making processes, and the development industry has a key part to play in this. The purpose of this policy is to ensure that new development is located and designed so it can adapt to and cope with the potential impacts and consequences of climate change such as heat waves. Flood risk, sustainable drainage, green infrastructure, trees, water resources, water conservation and water consumption targets, as well as sustainable design and construction are dealt with in more detail in separate policies within this Plan.

6.1.3 In this policy, 'new development' applies to new build development of 1 dwelling unit or more as well as to new build (including extensions) of 100sqm or more of non-residential floor space. Further guidance and advice is set out in the Sustainable Construction Checklist SPD, which has to be submitted as part of the planning application.

6.1.4 The following climatic changes and likely effects should be taken into account when considering the location, layout and design of new development to ensure they are fully resilient to future climate:

- hotter and drier summers, leading to increased cooling demands and water shortages
- more frequent extreme high temperatures, droughts and increased urban heat island effect (UHI)

- milder and wetter winters, with increases in rainfall, and associated increased fluvial and surface water flooding risks
- more frequent heavy downpours of rain and flash floods
- increases in sea level rise and increases in storm surge height
- decreases in soil moisture content in summer, leading to subsidence and potential effects on tree roots due to drying out of underlying clay
- increase in extreme weather events

6.1.5 It is predicted that London's summers will get progressively warmer, with an increased likelihood of extreme high temperatures. The absorption and retention of heat results in urban areas becoming warmer at night than rural areas (i.e. the 'urban heat island effect'; UHI). Increased densities, such as in main centres, are likely to increase the intensity of the UHI effect locally and efforts will therefore be required to offset the higher temperatures and UHI effect.

6.1.6 The cooling hierarchy seeks to reduce any potential overheating and also the need to cool a building through active cooling measures. Air conditioning systems are an energy intensive form of active cooling, with increased carbon dioxide emissions, and the emission of large amounts of heat into the surrounding area.

6.1.7 Adaptation to higher temperatures should be considered from the outset, not added as an afterthought and new developments should therefore take into account the following:

- Passive design: shading and orientation to reduce excessive solar gain in summer; balancing the need for shade in the summer with the need for light and warmth in the winter. Passive buildings aim to maintain interior thermal comfort throughout the sun's daily and annual cycles whilst reducing the requirement for active heating and cooling systems.
- Orientation of buildings and streets to capture passive ventilation and to reduce excessive solar gain and catch breezes as well as optimising sky view, thus maximising the rate of urban cooling. Reduce the amount of heat entering a building in summer through its windows (e.g. where windows are located; use of double-glazing).
- The use of light coloured materials on the exterior of buildings can help minimise the need for artificial cooling.
- Use of advanced glazing systems to reduce solar heat gain.
- Cool roofs, including white roofs, built from materials with high solar reflectance, absorb and store less solar energy during the day and thus are not major emitters of heat at night.
- Surfacing material with high solar reflectivity and good water permeability can be a very effective way of reducing high urban temperatures.
- Materials to prevent penetration of heat, including use of cool building materials and green roofs and walls.
- Innovative systems to make use of a building's ability to absorb heat during hot periods so that it can be dissipated in cooler periods.
- A network of high quality green spaces has social, health, ecological, recreational and flood storage benefits and can help to manage and reduce high temperatures. It is important to consider subsidence risk, availability of water, longer growing seasons and the species suitability and ability to adapt to a changing climate ("xeriscaping"). Watering and vegetation care needs to be taken into account, particularly during dry seasons, when water resources become limited.
- "Urban Greening" can be a cost effective approach as trees, tree canopies, woodlands and vegetation provide evapotranspirative cooling and shade. Roof top temperatures of green roofs may be up to 20-40°C cooler than a conventional flat dark coloured roof.

## 6.2 Flood Risk and Sustainable Drainage

### Policy LP 21

#### Flood Risk and Sustainable Drainage

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

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

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

	Land uses and developments – restrictions	Sequential Test	Exception Test	Flood Risk Assessment
<b>Zone 3b</b>	<p>The functional floodplain as identified in the Council's Strategic Flood Risk Assessment will be protected by not permitting any form of development on undeveloped sites unless it:</p> <ul style="list-style-type: none"> <li>• is for Water Compatible development;</li> <li>• is for essential utility infrastructure which has to be located in a flood risk area and no alternative locations are available and it can be demonstrated that the development would be safe, without increasing flood risk elsewhere and where possible would reduce flood risk overall.</li> </ul> <p>Redevelopment of existing developed sites will only be supported if there is no intensification of the land use and a net flood risk reduction is proposed; any restoration of the functional floodplain will be supported.</p> <p>Proposals for the change of use or conversion to a use with a higher vulnerability classification will not be permitted.</p>	Required for essential utility infrastructure	Required for essential utility infrastructure	Required for all development proposals
<b>Zone 3a</b>	<p>Land uses are restricted to Water Compatible, Less Vulnerable and More Vulnerable development. Highly Vulnerable developments will not be permitted.</p> <p>Self-contained residential basements and bedrooms at basement level will not be permitted.</p>	Required for all developments unless exceptions outlined in the justification apply	Required for more vulnerable development	Required for all development proposals
<b>Zone 2</b>	<p>No land use restrictions</p> <p>Self-contained residential basements and bedrooms at basement level will not be permitted.</p>	Required for all developments unless exceptions outlined in the justification apply	Required for highly vulnerable development	Required for all development proposals unless for change of use from water compatible to less vulnerable
<b>Zone 1</b>	No land use restrictions	Not applicable	Not applicable	<p>A Drainage Statement is required for sites all major developments.</p> <p>Required for all other development proposals where there is evidence of a risk from other sources of flooding, including surface water, ground water and sewer flooding.</p>

## Basements and subterranean developments

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

<b>Flood Zone 3b (Functional Floodplain)</b>	Basements, basement extensions, conversions of basements to a higher vulnerability classification or self-contained units will <u>not be permitted</u> .
<b>Flood Zone 3a (Tidal / Fluvial)</b>	<p><b>In areas of Extreme, Significant and Moderate Breach Hazard</b> (as set out in the Council's SFRA):</p> <ul style="list-style-type: none"> <li>• <b>New basements:</b> <ul style="list-style-type: none"> <li>○ restricted to Less Vulnerable / Water Compatible use only.</li> <li>○ 'More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed. Bedrooms at basement levels will not be permitted.</li> <li>○ 'Highly Vulnerable' such as self-contained basements/bedrooms uses will not be permitted.</li> </ul> </li> <li>• <b>Existing basements:</b> <ul style="list-style-type: none"> <li>○ No basement extensions, conversions or additions for 'Highly Vulnerable' uses.</li> <li>○ 'More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed.</li> </ul> </li> </ul> <p><b>In areas of Low or No Breach Hazard</b> (as set out in the Council's SFRA):</p> <ul style="list-style-type: none"> <li>• <b>New basements:</b> if the Exception Test (where applicable) is passed, basements may be permitted for residential use where they are <u>not</u> self-contained or used for bedrooms.</li> <li>• <b>Existing basements:</b> basement extensions, conversions or additions may be permitted for existing developments where they are <u>not</u> self-contained or used for bedrooms.</li> </ul> <p>If a basement, basement extension or conversion is acceptable in principle in terms of its location, it must have internal access to a higher floor and flood resistant and resilient design techniques must be adopted.</p>
<b>Flood Zone 2</b>	<p><b>In areas of Extreme, Significant and Moderate Breach Hazard</b> (as set out in the Council's SFRA):</p> <ul style="list-style-type: none"> <li>• <b>New Basements:</b> if the Exception Test (where applicable) is passed, basements may be permitted for residential use where they are <u>not</u> self-contained or used for bedrooms.</li> <li>• <b>Existing Basements:</b> basement extensions, conversions or additions may be permitted for existing developments where they are <u>not</u> self-contained or used for bedrooms.</li> </ul> <p>If a basement, basement extension or conversion is acceptable in principle in terms of its location, it must have internal access to a higher floor and flood resistant and resilient design techniques must be adopted.</p>
<b>Flood Zone 1</b>	No restrictions on new or extensions to existing basements

## Sustainable drainage

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

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

## Flood defences

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

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

5. The removal of formal or informal flood defences is not acceptable unless this is part of an agreed flood risk management strategy by the Environment Agency.

6.2.1 The Environment Agency produces Flood Maps for Planning with a nationally consistent delineation of “high” (Flood Zone 3), “medium” (Flood Zone 2) and “low” (Flood Zone 1) flood zones, which are updated and published on a quarterly basis. In addition, the Council’s Strategic Flood Risk Assessment, which is updated regularly, sub-divides the Environment Agency’s Flood Zone 3 into “high probability” (Zone 3a) and the “functional floodplain” (Zone 3b). Applicants need to use both flood maps to identify the flood risk relevant to their site. Explanations for the flood zones, land uses and their flood risk vulnerability, are set out in national policy and guidance.

### **Sequential Test**

6.2.2 Future development in Zone 3a and Zone 2 will only be considered if the 'Sequential Test' has been applied in accordance with national policy and guidance. However, there will be some exceptions to this. The Sequential Test will not be required if it is not a major development<sup>(2)</sup> and at least one of the following applies:

- It is a Local Plan proposal site that has already been sequentially tested, unless the use of the site being proposed is not in accordance with the allocations in the Local Plan.
- It is within a main centre boundary as identified within this Local Plan (Richmond, Twickenham, Teddington, Whitton and East Sheen).
- It is for residential development or a mixed use scheme and within the 400 metre buffer area identified within the Plan or surrounding the centres referred to above.
- Redevelopment of an existing single residential property.
- Conversions and change of use.

6.2.3 The Sequential Test will be required in all other cases.

6.2.4 The Council's bespoke approach to the Sequential Test recognises that relocating development from and around these centres (400 metres is considered to be walking distance from the centres) is not a realistic option and in order to sustain the continuing role of these centres, development can be used as a way to help manage and reduce flood risk in these areas.

### **Functional Floodplain**

6.2.5 The functional floodplain (Zone 3b), as identified within the Council’s SFRA, has to be preserved, and where possible, increased (such as through redevelopment proposals) and the impedance to the flow of floodwater reduced.

6.2.6 Redevelopment of existing developed sites will only be supported if there is a net flood risk reduction. Net flood risk reduction includes both on- and off-site measures, including reducing the land use vulnerability, raising of floor levels, reduction in run-off, increasing flood storage capacity, reduced impedance to flood water flow and the incorporation of flood resilient and/or resistant measures. Finished floor levels are to be raised to a minimum of 300mm above the 1 in 100 fluvial or 1 in 200 tidal flood level (whichever is greater), including an allowance for climate change, as recommended in the Council's SFRA, or to the maximum acceptable height possible below this, should sufficient justification be provided. Opportunities to restore the functional floodplain to its original state / condition are encouraged and will be supported.

6.2.7 The borough contains a number of islands on the River Thames. Where the access and egress to and from the island is within the functional floodplain, for the purposes of new development, such islands will be

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<sup>2</sup> “Major development is defined in The Town and Country Planning (Flooding) (England) Direction 2007 as: (1) in respect of residential development, a development where the number of dwellings to be provided is 10 or more, or the site area is 0.5 hectares or more; or (2) in respect of non-residential development, a development where the new floorspace to be provided is 1,000 square metres or more, or the site area is 1 hectare or more.”

considered and treated as functional floodplain (Zone 3b), even if parts of the islands may be within an area of lower probability of flooding.

### **Flood Risk Assessments**

6.2.8 Flood risk assessments (FRA) will be required in line with national policy and guidance. National policy and guidance, as well as the BSI Code of Practice on Assessing and managing flood risk in development (BS 8533:2011), provide detailed information on the requirements for assessing and managing flood risk in development and how to produce site-specific Flood Risk Assessments. All new development needs to take account of the latest climate change allowances. This should be included as part of the Flood Risk Assessment process. This will help minimise vulnerability and provide resilience to flooding in the future.

6.2.9 In addition to fluvial and tidal flooding, properties and infrastructure within the borough are also at risk of flooding from other, more localised sources, such as surface / groundwater / sewer flooding due to surcharging of sewers and drains or due to the failure of infrastructure. Flooding can also occur away from the floodplain as a result of development where off-site infrastructure is not in place ahead of development (also see policy LP 23 in [6.4 'Water Resources and Infrastructure'](#)). In addition, a Flood Risk Assessment is also required for smaller development proposals in Flood Zone 1, where there is evidence of a risk from other sources of flooding identified in the SFRA.

### **Basement and subterranean developments**

6.2.10 Basements within flood affected areas of the borough represent a particularly high risk to life, and it is essential that careful consideration is given to their design and use. Basements may be subject to very rapid inundation of floodwater and it is essential that the minimum design requirements as set out in this policy as well as in the Council's SFRA are rigorously adhered to.

6.2.11 This policy restricts basement developments in areas of Extreme, Significant and Moderate Breach Hazard, as set out in the Council's SFRA and 'More Vulnerable' (such as residential) uses will only be considered if a site-specific Flood Risk Assessment can demonstrate that the risk to life can be managed. As the SFRA is updated regularly, the applicant will need to confirm with the Council whether a development proposal is located within a breach hazard area.

6.2.12 No essential services or storage space for key provisions and equipment should be located at basement level where they need to remain operational during a flood event. By virtue of the low lying nature of basements, they are vulnerable to many types of flooding and in particular sewer flooding. Therefore, all new basements with a waste outlet (such as toilets, bathrooms, utility rooms) will need to be protected from sewer flooding through the installation of a suitable (positively) pumped device, which will need to be shown in drawings submitted with a planning application.

6.2.13 The Council's SFRA sets out further guidance on basements, including how to assess ground floor level and internal access level requirements for basements.

### **Flood Emergency Plan**

6.2.14 In addition to a Flood Risk Assessment (FRA), a Flood Emergency Plan will be required as follows:

- for schemes proposing 10 dwellings or more;
- For schemes of 1000sqm of non-residential development or more; and
- Where safe access/egress cannot be achieved and demonstrated as part of the FRA.

6.2.15 The main aims of a Flood Emergency Plan are to reduce the risk to life, mitigate damage, and enable a safe and well organised evacuation of occupants of premises during a flood event.

6.2.16 It is necessary in some instances to identify whether adequate flood warnings would be available and that people using the development will act on them to keep safe. Depending on the nature of a development and the severity of flooding on a site, a flood emergency procedure may entail retreating to a safe place of refuge within the development, leaving the development by a signed safe access route to dry ground beyond the flooded area, or preparing for rescue by the emergency services to safe locations previously identified in

a Flood Emergency Plan. More information is provided in the Council's guidance on producing a Flood Emergency Plan.

### **Flood Risk Management**

6.2.17 The borough is particularly susceptible to surface water flooding and therefore, where a Flood Risk Assessment is required, in addition to the Environment Agency's normal floodplain compensation requirement, on-site attenuation areas to alleviate fluvial and/or surface water flooding should be considered where there is an opportunity.

6.2.18 Flood resilient and resistant measures should be incorporated into the design of development proposals in any area susceptible to flooding to minimise and manage the risk of flooding. All parties involved on the design and development of buildings are expected to apply BS 85500:2015, which provides guidance to developers and designers on how to improve the flood resistance and resilience of buildings to reduce the impacts of flooding from all sources.

6.2.19 Existing developments in areas susceptible to flooding are encouraged to include flood resistant and/or resilient measures to mitigate potential flood risks. Retrofitting properties by integrating flood resilient and resistant measures could help to reduce the consequences of flooding and would ultimately contribute to positively managing flood risk in the borough.

6.2.20 Applicants and developers are encouraged to use the Environment Agency's Flood Risk Standing Advice for planning applicants and their agents, and early pre-application discussions with the Council and the Environment Agency are encouraged.

### **Sustainable Drainage**

6.2.21 The borough is very susceptible to surface water flooding. Surface water flooding happens when the ground and rivers cannot absorb heavy rainfall and when man-made drainage systems have insufficient capacity to deal with the volume of rainfall. Typically this type of flooding is localised and happens very quickly, making it very difficult to predict and give warnings. With climate change predicting more frequent short-duration, high intensity rainfall and more frequent periods of long-duration rainfall, coupled with an ageing Victorian sewer system and increasing pressure from growing populations, surface water flooding is likely to be an increasing problem.

6.2.22 Therefore, to reduce the risk of surface water and sewer flooding, all development proposals in the borough that could lead to changes to, and have impacts on, surface water run-off are required to follow the London Plan drainage hierarchy:

- store rainwater for later use
- use infiltration techniques, such as porous surfaces in non-clay areas
- attenuate rainwater in ponds or open water features for gradual release to a watercourse
- attenuate rainwater by storing in tanks or sealed water features for gradual release to a watercourse
- discharge rainwater direct to a watercourse
- discharge rainwater to a surface water drain
- discharge rainwater to a combined sewer.

6.2.23 If discharging surface water to a public sewer, developers are required to provide evidence that capacity exists in the public sewerage network to serve their development in the form of written confirmation. See also policy LP 23 in [6.4 'Water Resources and Infrastructure'](#).

6.2.24 The Council's SFRA identified reducing the rate of discharge from development sites to greenfield runoff rates as one of the most effective ways of reducing and managing flood risk within the borough. Greenfield run-off is the surface water drainage regime from a site prior to development. To maintain the natural equilibrium of a site, the surface water discharge from a developed site should not exceed the natural greenfield run-off rate. Where greenfield run-off rates are not technically feasible, applicants will be expected to clearly demonstrate how all opportunities to minimise final site runoff, as close to greenfield

rate as practical, have been taken. In such instances, the minimum requirement is to achieve at least a 50% attenuation of the site's surface water runoff at peak times, based on the site's performance prior to development.

6.2.25 Applicants and developers will need to submit evidence, as part of Flood Risk Assessments and/or requirements set out in the Council's Sustainable Construction Checklist SPD, that the above drainage hierarchy has been followed and SuDS have been utilised where feasible.

6.2.26 In addition to the above requirements, under the Flood and Water Management Act 2010, the local planning authority has to consult the Lead Local Flood Authority on SuDS for all major development proposals. Therefore, applicants have to submit drainage and surface water management designs as part of the planning process. The satisfactory performance of SuDS depends not only on good design but also adequate maintenance, and provision for adoption and maintenance must be made from the outset. The Council will use planning conditions or obligations to make sure that arrangements are in place for ongoing maintenance over the lifetime of the development.

6.2.27 Borough-specific guidance on SuDS can be found within the Council's SuDS Guidance Document as well as in the Council's SFRA.

### **Flood defences**

6.2.28 The protection of people, properties and infrastructure from the risk of fluvial and tidal flooding is essential in this borough and the integrity of the flood defence infrastructure must therefore be maintained. Flood defence infrastructure includes formal and informal flood defences and such defences may not always be recognisable and can include mounds, buildings and walls.

6.2.29 There is a statutory requirement for the Council to consult the Environment Agency for any development that could affect flood defence infrastructure; as a guide, this requirement applies to proposals within an area of 20 metres from the top of the bank of a main river. There are also parts of the borough, where the formal flood defence is further than 20 metres away from the top of the bank of the river, particularly in relation to the River Thames, and this needs to be taken account of in any development proposal that could affect the defences.

6.2.30 Proposals for redevelopment should seek opportunities to set back the development from existing flood defences. The Council, in conjunction with the Environment Agency, will require a buffer zone of 8 metres on the borough's rivers (including the fluvial Thames) and 16 metres for the tidal Thames. This is to allow for the maintenance and future upgrading of the flood defences as well as for improvements to flood flow and flood storage capabilities. Applicants are strongly encouraged to liaise with the Environment Agency for any development that could affect flood defence infrastructure as their consent will be required for any works that could affect the flood defences.

6.2.31 Developments should also take into account the requirements of the Thames Estuary 2100 (TE2100) Plan with regard to the implementation of current and future improvements to the River Thames tidal flood defences in order to effectively manage tidal flood risk over the plan period.

6.2.32 The River Thames Scheme (Datchet to Teddington) is a proposed programme of projects and investment to reduce flood risk. This includes improvements to Teddington Weir as well as the installation of property level products for existing homes to make them more resistant or resilient to flooding and working with communities to raise flood awareness by supporting them in flood preparedness, response and recovery.

## 6.3 Sustainable Design and Construction

### Policy LP 22

#### Sustainable Design and Construction

A. Developments will be required to achieve the highest standards of sustainable design and construction to mitigate the likely effects of climate change. Applicants will be required to complete the following:

1. Development of 1 dwelling unit or more, or 100sqm or more of non-residential floor space (including extensions) will be required to complete the Sustainable Construction Checklist SPD. A completed Checklist has to be submitted as part of the planning application.
2. Development that results in a new residential dwelling, including conversions, change of use, and extensions that result in a new dwelling unit, will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption).
3. New non-residential buildings over 100sqm will be required to meet BREEAM 'Excellent' standard.
4. Proposals for change of use to residential will be required to meet BREEAM Domestic Refurbishment 'Excellent' standard (where feasible).

#### Reducing Carbon Dioxide Emissions

B. Developers are required to incorporate measures to improve energy conservation and efficiency as well as contributions to renewable and low carbon energy generation. Proposed developments are required to meet the following minimum reductions in carbon dioxide emissions:

1. All new major residential developments (10 units or more) should achieve zero carbon standards in line with London Plan policy.
2. All other new residential buildings should achieve a 35% reduction.
3. All non-residential buildings over 100sqm should achieve a 35% reduction. From 2019 all major non-residential buildings should achieve zero carbon standards in line with London Plan policy.

Targets are expressed as a percentage improvement over the target emission rate (TER) based on Part L of the 2013 Building Regulations.

C. This should be achieved by following the Energy Hierarchy:

1. Be lean: use less energy
2. Be clean: supply energy efficiently
3. Be green: use renewable energy

#### Decentralised Energy Networks

D. The Council requires developments to contribute towards the Mayor of London target of 25% of heat and power to be generated through localised decentralised energy (DE) systems by 2025. The following will be required:

1. All new development will be required to connect to existing DE networks where feasible. This also applies where a DE network is planned and expected to be operational within 5 years of the development being completed.
2. Development proposals of 50 units or more, or new non-residential development of 1000sqm or more, will need to provide an assessment of the provision of on-site decentralised energy (DE) networks and combined heat and power (CHP).

3. Where feasible, new development of 50 units or more, or new non-residential development of 1000sqm or more, as well as schemes for the Proposal Sites identified in this Plan, will need to provide on-site DE and CHP; this is particularly necessary within the clusters identified for DE opportunities in the borough-wide Heat Mapping Study. Where on-site provision is not feasible, provision should be made for future connection to a local DE network should one become available.

Applicants are required to consider the installation of low, or preferably ultra-low, NOx boilers to reduce the amount of NOx emitted in the borough.

Local opportunities to contribute towards decentralised energy supply from renewable and low-carbon technologies will be encouraged where appropriate.

### **Retrofitting**

E. High standards of energy and water efficiency in existing developments will be supported wherever possible through retrofitting. Householder extensions and other development proposals that do not meet the thresholds set out in this policy are encouraged to complete and submit the Sustainable Construction Checklist SPD as far as possible, and opportunities for micro-generation of renewable energy will be supported in line with other policies in this Plan.

6.3.1 This policy seeks to ensure that all new development and refurbishment is as sustainable as possible in order to mitigate the impact of development on the environment. All new buildings should be built to a standard which minimises the consumption of resources during construction and occupation and the use of recycled or secondary aggregates in construction is encouraged where suitable. The policy takes forward the Council's commitment to sustainable construction and design. Where the policy exceeds national standards, this is based on local evidence and justification.

6.3.2 The Council's Sustainable Construction Checklist SPD will be applied to development which involves the creation of one or more residential units, and commercial or other developments of 100sqm or more (including extensions). Applicants are required to submit an Energy Statement to show how the requirements of the themes within the Checklist have been met within the proposed new development.

### **Water efficiency**

6.3.3 London is classified as 'seriously' water stressed, meaning that more water is taken from the environment than the environment can sustain in the long term. London's water supply and demand is finely balanced and climate change as well as population growth will increase the risk of drought and impacts on the environment. Predicted higher temperatures due to climate change and a growing population mean that the borough's estimated water supply availability (in a dry year) is shown to be in significant deficit. Therefore, high standards of water efficiency will be required in new developments in order to address the fact that drinking water is becoming an increasingly limited resource in this borough. New developments, in their design, landscaping, construction and operation, should incorporate measures to avoid water wastage.

6.3.4 The Council has adopted the 'optional' higher national technical standard for water consumption of 110 litres per person per day (including an allowance of 5 litres or less per person per day for external water consumption) in line with the national technical standard set out in Part G of the Building Regulations 2013. All new residential developments including conversions, reversions, change of use and extensions that create one or more new dwellings must meet this target.

6.3.5 A minimum of 2 credits on water consumption will be required for all other types of developments in order to achieve BREEAM "excellent". Where a BREEAM assessment is not technically feasible, applicants should incorporate best practice water saving and recycling measures as outlined in the Sustainable Construction Checklist SPD.

6.3.6 A number of water saving measures and equipment may be incorporated into developments to comply with the maximum water consumption levels set out in Part A, criterion 2 above:

- There should be full use of water saving devices, water efficient fixtures and fittings.
- Rainwater and grey water recycling (water butts or more complex collection and treatment systems) can significantly reduce water consumption, particular potable water. Grey water recycling will need to be energy efficient.
- Landscaping and gardens should be designed to lower water demand.
- Sustainable Drainage Systems (SuDS), including rainwater harvesting and storage from roofs and other surfaces can significantly reduce demand for water.

## **Reducing carbon dioxide emissions**

6.3.7 The Council requires developments to make a significant contribution towards the Mayor of London target to achieve a 60% reduction in London's carbon dioxide emissions by 2025 against a 1990 baseline (this exceeds the national Government target).

6.3.8 The Council promotes the move towards a low carbon economy and remains committed to working towards zero carbon standards for all new developments. Future changes to energy efficiency standards will be kept under review and policy requirements will be updated with the prevailing standards if required.

6.3.9 All development proposals should apply the following Energy Hierarchy:

1. First, an efficient design to minimise the amount of energy use and developments. Energy use in new development can be reduced by appropriate siting, design, landscaping and energy efficiencies within the building, and these can be retro-fitted to existing buildings. All new developments are required to conform to the Sustainable Construction Checklist. New developments as well as conversions and refurbishments will be expected to achieve high environmental standards. Designing for minimum energy use and reducing predicted site CO<sub>2</sub> emissions should be addressed in an energy statement.
2. Second, the use of low carbon technologies such as decentralised energy networks. Decentralised Energy (DE) systems generate power at the point of use which is more efficient than centralised electricity generation where both heat and energy are wasted in production and transmission. DE will be predominantly based around combined heat and power (CHP), district heating and cooling.
3. Finally, where feasible and viable, a contribution from renewable sources should be included.

6.3.10 The Council will require an assessment of energy demand and carbon dioxide emissions from the proposed development, which should demonstrate the expected energy and emissions savings from energy efficiency and renewable energy measures incorporated into the development. Due to the built up nature of most of the borough, wind turbines are unlikely to be suitable, but other renewable technologies such as photovoltaic cells, solar panels, ground and air source heat pumps and other forms of renewable energy may be appropriate in many parts of the borough, subject to other policies within this Plan.

6.3.11 The Energy Statement must demonstrate how the energy requirements will be met in line with the Energy Hierarchy.

6.3.12 Major residential developments (10 units or more) should achieve zero carbon standards in line with the London Plan. A zero carbon home is one where at least 35% of regulated CO<sub>2</sub> emissions reductions are achieved on-site, with the remaining emissions (up to 100%) to be offset through a contribution into the Council's Carbon Offset Fund. The Council has adopted the London Plan price of carbon which is £60 per tonne x 30 years equalling £1,800 per tonne of carbon. Zero carbon standards will apply to major non-residential schemes from 2019. Where development viability is a concern, affordable housing will be prioritised over zero carbon contributions.

6.3.13 All other new residential schemes should achieve a 35% reduction in carbon dioxide emissions. The target of 35% is expressed as minimum improvement over the Target Emission Rate (TER) outlined in the national Building Regulations (2013).

6.3.14 The Council recognises that there may be instances where it is not technically feasible for a development to achieve a 35% reduction in carbon dioxide emissions over Building Regulations (2013). In such cases an applicant will have to demonstrate and set out clearly in the Energy Statement why the carbon dioxide emissions reduction target cannot be met on-site. Any shortfall in on-site reductions can exceptionally be met through a cash-in-lieu contribution to the Council's Carbon Offset Fund, agreed through a Section 106 legal agreement in line with the Planning Obligations SPD.

6.3.15 Where conflict between climate change objectives and the conservation of heritage assets is unavoidable, the public benefit of mitigating the effects of climate change will be weighed against any harm to the significance of the heritage asset, in accordance with national, London Plan and the council's planning policies. Guidance can also be found in Historic England's advice on 'Energy efficiency and Historic Buildings'.

### **Decentralised Energy Networks**

6.3.16 Decentralised Energy (DE) is a local or sub-regional supply of heat and electricity from a central source (i.e. an Energy Centre). The Energy Centre normally hosts one or more Combined Heat and Power (CHP) units, which co-produce electricity and heat, for which a wide range of technologies and fuels can be used. The heat output of a CHP plant can also be used to provide cooling via absorption chillers; these installations are known as Combined Cooling, Heat and Power (CCHP).

6.3.17 The Mayor has set a target for London to generate 25% of its heat and power requirements through the use of district heating networks and other forms of decentralised energy systems by 2025. There is an expectation that the provision and availability of DE networks for developments to connect to, will increase during the lifetime of this Plan. As such, all new development will be required to connect to existing DE networks where feasible. This also applies where a DE network is planned and expected to be operational within 5 years of the development being completed.

6.3.18 Applicants for development proposals of 50 units or more, or new non-residential development of 1000sqm or more, will be required to provide an assessment of the provision of on-site decentralised energy (DE) networks and combined heat and power (CHP). In addition, all applications for developments of 50 units or more, or new non-residential development of 1000sqm or more, should assess the feasibility of providing Decentralised Energy (DE) and Combined Heat and Power (CHP) on their site.

6.3.19 The borough-wide Heat Mapping Study identified the following 7 clusters with opportunities for DE networks in the borough (maps of these areas are set out in the Study, which is available on the Council's website):

- Richmond Centre
- Teddington
- Mortlake
- Twickenham Centre
- Richmond-Wandsworth
- Richmond-Kingston
- Richmond-Hounslow

6.3.20 Fuel combustion as part of CHPs can potentially give rise to air pollutants, particularly oxides of nitrogen (NOx), which can have a negative impact on health. Therefore, developers are required to consider the installation of low, or preferably ultra-low, NOx boilers to reduce the amount of NOx emitted in the borough. Further details and guidance can be obtained from the Council.

### **Conversions and refurbishment**

6.3.21 Conversions and extensions that can be assessed under the BREEAM Domestic Refurbishment scheme are required to meet the "excellent" standard. If a scheme cannot be assessed under BREEAM (such as where the proposal only relates to minor internal re-modelling work), written confirmation will have to be provided as part of the planning application by an accredited assessor.

6.3.22 Retrofitting existing properties, particularly residential buildings, presents a significant opportunity to help meet the carbon emission reduction target. Adapting and retrofitting existing homes provides the opportunity to make them more comfortable, marketable, resource efficient, and fit for purpose in the present and the future. Compliance with the energy and water saving sections of the Sustainable Construction Checklist SPD is encouraged for all schemes that do not meet the size threshold for the Checklist to be submitted, such as householder extensions.

6.3.23 The sensitivity of existing developments, in particular heritage assets, in terms of their historic fabric and significance, should be considered before developing methods in which to retrofit higher standards of energy and water efficiency.

### Summary of requirements

6.3.24 The table below summarises the sustainable design and construction standards that must be met for different types of developments.

Type of development	Standards to be met
Major residential development (10 units or more)	<ul style="list-style-type: none"> <li>• Zero carbon standards</li> <li>• Submit energy statement</li> <li>• National water standards - 110 l/p/d</li> <li>• Submit Sustainable Construction Checklist</li> </ul>
All development that results in a new residential dwelling or unit including conversions, reversions, change of use and extensions that create one or more new dwellings	<ul style="list-style-type: none"> <li>• 35% reduction in CO2 emissions over Building Regulations (2013)</li> <li>• Submit energy statement</li> <li>• National water standards - 110 l/p/d</li> <li>• Submit Sustainable Construction Checklist</li> </ul>
Change of use or conversion to residential and residential extensions which do not result in a new dwelling	<ul style="list-style-type: none"> <li>• BREEAM Domestic Refurbishment 'Excellent' (where feasible)</li> <li>• Submit Sustainable Construction Checklist</li> </ul>
New non-residential buildings, including extensions, over 100sqm floorspace	<ul style="list-style-type: none"> <li>• BREEAM 'Excellent'</li> <li>• 35% reduction in CO2 emissions over Building Regulations (2013)</li> <li>• Submit energy statement</li> <li>• Submit Sustainable Construction Checklist</li> </ul>
Major new non-residential buildings, including extensions, over 1,000sqm floorspace	<ul style="list-style-type: none"> <li>• Zero carbon standards from 2019</li> <li>• BREEAM 'Excellent'</li> <li>• Submit energy statement</li> <li>• Submit Sustainable Construction Checklist</li> </ul>

## 6.4 Water Resources and Infrastructure

### Policy LP 23

#### Water Resources and Infrastructure

A. The borough's water resources and supplies will be protected by resisting development proposals that would pose an unacceptable threat to the borough's rivers, surface water and groundwater quantity and quality. This includes pollution caused by water run-off from developments into nearby waterways.

#### Water Quality

B. The Council encourages proposals that seek to increase water availability or protect and improve the quality of rivers or groundwater.

The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact.

Where rivers have been classified by the Environment Agency as having 'poor' status, any development affecting such rivers is encouraged to improve the water quality in these areas.

#### Water and sewerage provision

C. New major residential or major non-residential development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development.

Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:

1. sufficient capacity already exists, or
2. extra capacity can be provided in time to serve the development, which will ensure that the environment and the amenities of local residents are not adversely affected.

Applicants for major developments will be required to provide evidence in the form of written confirmation as part of the planning application that capacity exists in the public sewerage and water supply network to serve their development.

Any new water supply, sewerage or waste water treatment infrastructure must be in place prior to occupation of the development. Financial contributions may be required for new developments towards the provision of, or improvements to, such infrastructure.

### Water quality

6.4.1 The Council seeks to protect and improve water quality to ensure that the Blue Ribbon Network is healthy, attractive and offers a valuable series of habitats. Proposals that have the potential to lead to a reduction in water quality will be resisted.

6.4.2 Under the Water Framework Directive (WFD), there are four river water-bodies in this borough, all of which fail to achieve 'good' ecological status under the WFD. The Beverley Brook, the Thames (upstream of Teddington) and the Crane water-bodies have been classified as having 'poor' ecological status and the Longford River has 'moderate' ecological status. Developments adjacent to, or with the potential to affect, these rivers are encouraged to include measures such as managing the run-off or improving surface water outfalls, in order to improve their water quality.

6.4.3 Some local surface water and groundwater bodies in the gravel aquifer are hydraulically connected. Potentially contaminative uses will be directed away from locations that are particularly sensitive in terms of groundwater and surface water receptors in order to protect the surface water courses and the groundwater quality of the borough's aquifers.

## Water and sewerage provision

6.4.4 Many existing water mains, sewerage systems and treatment works are becoming overloaded. It is essential to ensure that such infrastructure is in place ahead of development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low-pressure water supply problems. Consequently, development should only take place where the new demand upon existing infrastructure is taken into account.

6.4.5 Applicants for major development proposals (both residential as well as non-residential) are required to provide evidence that adequate capacity exists in the public sewerage and water supply network to serve their development in the form of written confirmation. This statement should be submitted as part of the planning application.

6.4.6 Where capacity does not exist and to avoid overloading of existing infrastructure, a drainage strategy should be provided to show the required infrastructure and its funding. Where there is a capacity problem and no improvements are programmed by Thames Water Utilities, the developer will be required to contact Thames Water to agree what improvements are required and how they will be funded. If improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements. Any sewerage/waste water treatment infrastructure must be in place prior to first occupation of the development. A financial contribution may be required towards the provision of, or improvements to, infrastructure. Sewers and associated infrastructure will need to be protected from new construction and tree planting.

## 6.5 Waste Management

### Policy LP 24

#### Waste Management

The Council will ensure that waste is managed in accordance with the waste hierarchy, which is to reduce, reuse or recycle waste as close as possible to where it is produced. The Council will require the following:

1. All developments, including conversions and changes of use are required to provide adequate refuse and recycling storage space and facilities, which allows for ease of collection and which residents and occupiers can easily access, in line with the guidance and advice set out in the Council's SPD on Refuse and Recycling Storage Requirements.
2. All developments need to ensure that the management of waste, including the location and design of refuse and recycling facilities, is sensitively integrated within the overall design of the scheme, in accordance with policies on Local Character and Design.
3. Development proposals, where appropriate, should make use of the rail and the waterway network for the transportation of construction, demolition and other waste. Development proposals in close proximity to the river should utilise the river for the transport of construction materials and waste where practicable.
4. All major developments, and where appropriate developments that are likely to generate large amounts of waste, are required to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials.

Proposals affecting existing waste management sites, as well as proposals for new or additional waste management facilities, will be assessed against the policies of the West London Waste Plan (2015).

6.5.1 The Council will ensure that waste collection and disposal arrangements are developed in accordance with the principles of sustainability based on the Waste Management Hierarchy:

1. prevention or reduction;
2. re-use and preparation for reuse;
3. recycling and composting;
4. recovery; and lastly
5. disposal to landfill or incineration without energy recovery.

6.5.2 This policy seeks to minimise the amount of waste going to landfill and contributes towards the borough being more self-sufficient in dealing with its waste. In addition, the Council considers the layout, siting, function and design of recycling and refuse storage facilities to be an integral part of the development process. If considered at the initial stage of the design process, proposals for new developments can integrate refuse and recycling within the scheme without causing undue noise and odour nuisance or other impacts on amenity and living conditions.

6.5.3 This policy ensures that all development proposals provide adequate refuse and recycling storage space and facilities to serve new developments, in line with the guidance and advice set out in the Council's SPD on Refuse and Recycling Storage Requirements.

6.5.4 London is moving towards waste self-sufficiency, and the Mayor of London aims to manage as much of its waste within London as practicable, and sending zero biodegradable and recyclable waste to landfill by 2031. To achieve this, the Council adopted the West London Waste Plan (WLWP) in 2015 in partnership with the West London Waste Authority boroughs of Brent, Ealing, Harrow, Hillingdon and Hounslow (this also includes the Old Oak and Park Royal Development Corporation). This sets out how the boroughs will manage their waste apportionment requirements as set out in the London Plan.

6.5.5 The WLWP identifies a range of suitable sites for the management of all West London's waste up to 2031. It includes policies and guidelines for determining planning applications for waste developments and ensures that facilities are provided to meet the amount of waste allocated to the West London Waste area through the London Plan.

6.5.6 The Council will apply the policies of the WLWP when dealing with applications affecting existing waste sites, such as the Central Depot in Twickenham, the Civic Amenity site in Townmead Road or any other sites with waste management or treatment facilities as identified in the WLWP. In addition, the policies of the WLWP will be used for assessing proposals for new or additional waste management facilities in the borough.

[new para] The existing waste management sites as set out in Appendix 2 of the West London Waste Plan were identified at a snapshot in time. This list can be revised. New waste sites, permissions and licences may be granted by the Council or Environment Agency. The Council carries out regular monitoring of existing waste sites, the results of which, including maps of operational sites, are published as part of the Authority's Monitoring Report.

6.5.7 The Council will work with partners in the West London Waste Authority when dealing with West London's waste, and ensure that the West London Waste Authority boroughs achieve net self-sufficiency and contribute to the Mayor of London's aim of managing the equivalent of 100% of London's waste within London by 2031 and work towards zero biodegradable or recyclable waste to landfill by 2031.

## 7 Borough's Centres

### 7.1 Development in Centres

#### Policy LP 25

##### Development in Centres

A. Development in the borough's centres, as defined in the centre hierarchy, will be acceptable if it:

1. is in keeping with the centre's role and function within the hierarchy and is of a scale appropriate to the size of the centre (also see the Spatial Strategy of this Plan); and

2. is in an appropriate location, as follows:

a. A1 uses should be located within, adjacent to or well-related (or capable of being made so) to designated shopping frontages.

b. For other appropriate uses (see B & C below), major development and/or developments which generate high levels of trips should be located within a Main Centre Boundary. Elsewhere development should be located within the defined Area of Mixed Use (AMU boundary). For centres, or parts of centres where no boundary exists, proposals should be well-related to designated shopping frontages.

Proposals not in the above locations, including extensions to existing retail and leisure developments of more than 200sqm gross, should satisfy the Sequential Test as set out in national policy and guidance.

Out of centre retail development is not considered appropriate in line with the London Plan; and

3. does not adversely impact on the vitality and viability of the centre in which the development is proposed, or another centre. When assessing proposals for development outside of existing centres, applicants will have to comply with the requirements of national policy and guidance in relation to impact assessments. For retail developments, including extensions, of over 500sqm gross, the Council will require a Retail Impact Assessment. The scope of such assessments will need to be agreed with the Council before submitting a planning application; and

4. optimises the potential of sites by contributing towards a suitable mix of uses that enhance the vitality and viability of the centre. Commercial or community uses should be provided on the ground floor fronting the street, subject to other Local Plan policies, including the retail frontages policy LP 26.

B. In addition to A above, the following applies to development proposals in the borough's five main centres:

1. The Council will support appropriate development <sup>(2)</sup> in the five main centres.

2. The Council will encourage proposals for leisure, cultural and tourism facilities which contribute to the diversity of the offer.

3. Proposals for A1 uses should include, where appropriate, units of a size suitable for modern retail needs (particularly in Richmond centre, where there is a shortage of retail units with larger floor-plates) whilst retaining sufficient traditional smaller units that add to the local character and which are important to local businesses.

C. In addition to A above, in the local and neighbourhood centres as well as parades of local importance, the following applies:

1. Appropriate uses could include new retail (including markets), business or employment developments, which maintain suitable provision for small businesses, and other uses, which primarily serve the needs of the local community or attract visitors and develop cultural opportunities.

2. Development should, wherever possible, include overall improvements and enhancements of the small centres where appropriate, and/or modernise outdated premises.

(2) Types of development appropriate in the five main centres comprise retail development (including warehouse clubs, factory outlet centres and markets); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

## The centre hierarchy

7.1.1 The following table sets out the borough's centre hierarchy:

Type of Centre	Name of Centre	Delineated by
Main centres <sup>3</sup>	Richmond Twickenham Teddington East Sheen Whitton	Main Centre Boundaries
Local centres	Barnes (High Street & Church Road) East Twickenham Hampton Hill Hampton Village Ham Parade Kew Gardens St Margarets	Area of Mixed Use Boundary <sup>(4)</sup>
Neighbourhood centres	Castelnau Friars Stile Road Hampton Wick Heathside (Powder Mill Lane) Sheen Road Kingston Road (Teddington) Stanley Road (Teddington) White Hart Lane (Barnes/Mortlake)	Area of Mixed Use Boundary <sup>(4)</sup>
Parades of local importance	Ashburnham Road Fulwell Ham Street/Back Lane Hampton Nursery Lands Hospital Bridge Road Kew Green Kew Road Lower Mortlake Road Nelson Road St Margarets Road (parade to the north of A316) Sandycombe Road (Kew) Strawberry Hill Twickenham Green Waldegrave Road Whitton Road	Area of Mixed Use Boundary <sup>(4)</sup>

(3) Richmond is classified as a 'major centre' and the remaining 4 main centres are classified as 'district centres' in the London Plan's town centre network.

(4) There are a small number of centres which do not have an AMU boundary. In these locations proposals are expected to be located within or near to designated shopping frontages where the majority of commercial development is located.

## The five main centres

7.1.2 The borough's five main centres comprising the principal centre of Richmond and the four district centres of Twickenham, Teddington, East Sheen and Whitton make up the first tier of the borough's centre hierarchy. They have an important role to play, providing shops, services, employment opportunities, housing and being a focus for community and cultural life.

7.1.3 The policy develops the approach set out in the overall Spatial Strategy of this Plan by steering major development into the five main centres. Richmond main centre in particular is where the majority of commercial development is expected to be focused.

7.1.4 The borough is characterised by some of the lowest population densities in London, which adds to the attractiveness of the borough whilst increasing development pressures. Focusing development in the main centres will result in sustainability benefits, including a reduction in the need to travel by car and also mitigate the effects of the increasing development pressure on the rest of the borough. Therefore, major commercial development should be located within the defined Main Centre Boundaries (with the exception of retail uses which must be in, adjacent or well-related to designated frontages).

7.1.5 There have been significant structural changes to the retail sector in recent years, particularly in the growth in popularity of internet shopping, which have put pressure on the borough's high streets. However, research into the health of centres, including vacancy rates, suggests that the borough's main centres continue to perform well. In this context, the Retail Study published in 2014 estimates that a modest increase in retail floorspace will be needed by 2024. The projections suggest there is scope for about 4,000sqm gross of convenience goods floorspace (Use Class A1), 11,500sqm gross of comparison goods floorspace (Use Class A1) and 6,500sqm gross of Class A3/A4/A5 floorspace. Some of this need could be met by the re-occupation of existing vacant units in some centres. However, it is unlikely that vacant shops can accommodate more than a quarter of the additional capacity needed and hence the Local Plan includes site allocations to meet the remainder of the forecast increase in floorspace needed.

7.1.6 To retain and develop the vibrancy and vitality of the borough's centres, they should have an appropriate range of shops and services. This should be at a level appropriate to the centre, and not of a kind that would damage the ability of the surrounding area, or other centres, to function.

7.1.7 The table below sets out the vision and approach for the main centres in the borough:

Name of main centre	Vision and approach
Richmond	<ul style="list-style-type: none"> <li>• Richmond main centre is defined as a 'major' centre in the London Plan's network of town centres.</li> <li>• Richmond main centre is the most accessible centre by public transport and is therefore the most appropriate location for major new commercial development which attracts both local people and those who live outside the borough. This major centre is expected to accommodate much of the borough's forecast retail floorspace. The Spatial Strategy recognises that the centre should be reinforced to an extent compatible with environmental constraints, including recognising the many listed buildings and Conservation Areas in the core of the centre.</li> <li>• The Richmond and Richmond Hill Village Planning Guidance SPD was adopted in June 2016. It sets out the vision for the area which includes: <ul style="list-style-type: none"> <li>○ that Richmond will continue to be a thriving major centre with convenience and specialist shops, employment, leisure and tourism, cultural and social facilities;</li> <li>○ the need to maintain and improve shopfronts and signage; and</li> <li>○ the growth of the evening economy will need to be carefully managed to ensure the amenity of residents is maintained and the possibility of gaining Purple Flag status is to be explored.</li> </ul> </li> </ul>

	<p>In addition:</p> <ul style="list-style-type: none"> <li>• The Council encourages new office development, particularly within the designated Key Office Areas.</li> <li>• The Council supports businesses and retailers, including through the proposed Business Improvement District.</li> <li>• Richmond main centre is suitable for higher density residential development comprising small units; car free development may be appropriate in areas with a PTAL of 5 or 6.</li> <li>• The London Plan identifies Richmond as a potential Outer London Development Centre for leisure/tourism/arts/culture/ sports and notes the special strengths of Richmond centre, including the potential to generate significant growth as a centre of greater than sub-regional importance in the area of leisure and tourism.</li> <li>• The London Plan defines Richmond as providing a cluster of night time activities of sub-regional importance. It should be noted that the Council's Licensing Policy includes a designated Cumulative Impact Zone in Richmond centre to ensure that increases in such uses do not adversely impact on the amenities of local residents.</li> </ul>
Twickenham	<ul style="list-style-type: none"> <li>• Twickenham is defined as a 'district' centre in the London Plan's network of town centres.</li> <li>• Twickenham is highly accessible by public transport and thus suitable for new major commercial development, which attract both local people and people who live outside the borough.</li> <li>• The Twickenham Area Action Plan (AAP) was adopted in 2013 and sets out the framework for developing the centre, including site specific proposals. The AAP is based on five key themes: <ul style="list-style-type: none"> <li>○ revitalising the high street, including improvements to the retail, food and beverage offer of the centre, making the most of the presence of the rugby spectator;</li> <li>○ enhancing the leisure, entertainment and cultural offer, including improving the range and quality of attractions, to attract people into the centre;</li> <li>○ making the centre a more inviting place at all times of the day and evening for people of all ages;</li> <li>○ improving the public realm, reducing the impact of traffic and creating an attractive and safe place to visit and enjoy; and</li> <li>○ protecting, enhancing and making the most of the character of the centre's built and open environment, including the riverside and working waterfront.</li> </ul> </li> </ul> <p>In addition:</p> <ul style="list-style-type: none"> <li>• The Council encourages new office development, particularly within the designated Key Office Areas.</li> <li>• The Council supports Twickenham's Business Improvement District, which was set up in early 2014 to support businesses.</li> <li>• The London Plan identifies Twickenham as a 'night time economy cluster of more than local importance'. It should be noted that the Council's Licensing Policy includes a designated Cumulative Impact Zone in Twickenham centre to ensure that increases in such uses do not adversely impact on the amenities of local residents.</li> </ul>
Teddington	<ul style="list-style-type: none"> <li>• Teddington is defined as a 'district' centre in the London Plan's network of town centres.</li> <li>• Teddington is less accessible by public transport in comparison to Richmond and</li> </ul>

	<p>Twickenham; therefore, the centre is more suited to providing shops, services and employment opportunities for local communities.</p> <ul style="list-style-type: none"> <li>● The Spatial Strategy sets out the need to maintain and enhance, rather than significantly expand, Teddington centre.</li> <li>● The Council seeks to maintain, and where appropriate enhance, Teddington's role in providing office space for businesses. New office development is particularly encouraged in the designated Key Office Areas.</li> <li>● Teddington has a well-established restaurant sector. The Spatial Strategy supports establishments that serve local needs and communities.</li> <li>● The Hampton Wick and Teddington Village Planning Guidance SPD was adopted in June 2017. It sets out the vision for Teddington, including that it will: <ul style="list-style-type: none"> <li>○ continue to be a welcoming community for residents, visitors and businesses;</li> <li>○ provide a wide range of independent and other shops, employment, leisure, cultural, health and social facilities and support a range of community activities;</li> <li>○ manage access, traffic and parking so that the role of the centre and needs of the community are supported; and</li> <li>○ ensure that residential areas will continue to enjoy and use amenities such as Teddington's open spaces, the historic Royal Parks and the River Thames.</li> </ul> </li> </ul>
East Sheen	<ul style="list-style-type: none"> <li>● East Sheen is defined as a 'district' centre in the London Plan's network of town centres.</li> <li>● East Sheen is less accessible by public transport in comparison to Richmond and Twickenham; therefore, the centre is more suited to providing shops, services and employment opportunities for local communities.</li> <li>● The East Sheen Village Planning Guidance SPD was adopted in January 2016. The vision for East Sheen includes to: <ul style="list-style-type: none"> <li>○ retain the established character of the area;</li> <li>○ improve the convenience of the shopping centre for the community including through its range of uses;</li> <li>○ manage the impacts of the Upper Richmond Road West on the environment and its users wherever possible;</li> <li>○ create a 'centre' for the village at Milestone Green;</li> <li>○ utilise pavements to improve and enliven the streetscene in parts of the Upper Richmond Road West; and</li> <li>○ improve Mortlake Station.</li> </ul> </li> <li>● In addition:</li> <li>● The Spatial Strategy sets out the need to maintain and enhance, rather than significantly expand, East Sheen centre.</li> <li>● The Council seeks to maintain, and where appropriate enhance, East Sheen's role in providing office space for businesses. New office development is particularly encouraged in the designated Key Office Areas.</li> <li>● The Spatial Strategy supports establishments, such as drinking establishments, that serve local needs and communities.</li> </ul>
Whitton	<ul style="list-style-type: none"> <li>● Whitton is defined as a 'district' centre in the London Plan's network of town centres.</li> <li>● Whitton is less accessible by public transport in comparison to Richmond and</li> </ul>

	<p>Twickenham; therefore, the centre is more suited to providing shops, services and employment opportunities for local communities as well as recognising the role the centre plays for visitors to Twickenham Stadium.</p> <ul style="list-style-type: none"> <li>• The Whitton and Heathfield Village Planning Guidance SPD was adopted in July 2014. The vision for the area includes to: <ul style="list-style-type: none"> <li>○ retain and reinforce the established character of the area; and</li> <li>○ maintain, and where appropriate enhance, shopping and services, including supporting an improved evening offer.</li> </ul> </li> <li>• In addition:</li> <li>• The Spatial Strategy sets out the need to maintain and enhance, rather than significantly expand, Whitton centre.</li> <li>• The Council seeks to maintain, and where appropriate improve, the range and choice of shopping in the centre.</li> </ul>
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7.1.8 The majority of the borough's main centres fall within London's Arcadia Strategic Cultural Area (as set out in the London Plan). The Council's Cultural Partnership Strategy 2015-2019 provides a framework for developing the arts, culture and sport until 2019, aiming to increase participation and develop services with a community focus.

### Local and neighbourhood centres and parades of local importance

7.1.9 Local and neighbourhood centres as well as parades of local importance provide a focus for local communities and opportunities to meet, shop, work and spend leisure time. The successful function of the smaller centres of the borough is of special importance as the benefits for residents and local communities are significant; they are both quantifiable but can also be more intangible. A successful local centre provides goods and services that result in a reduced need to travel. It also supports local business, which in turn benefits the wider community. Local centres in particular can create or foster a sense of community and inclusiveness that adds to the cohesiveness of the surrounding community.

7.1.10 The size and function of these centres vary considerably, ranging from larger local centres, such as Barnes and Hampton Hill with a good range of food and comparison shops, independent and specialist shops, community and cultural facilities, through to parades with a small number of shops meeting very local but valued needs.

7.1.11 The size of a proposed development should reflect the size and function of the relevant centre (as set out in the table above). For example, a large retail store should not be added to a small parade so that it effectively operates as a stand-alone store. Larger centres (often local centres in the hierarchy) will have a diverse role, in some cases significant leisure offers and have, or are developing, niche roles. Such centres should be able to develop their tourism potential or specialist shopping offer. The Council will seek to support businesses that are successful and expanding.

### Village Planning Guidance SPDs for villages

7.1.12 The Council is currently developing Village Planning Guidance SPDs for village areas across the borough. The SPDs provide guidance on design and local character to support the overall vision for the village area, which will assist in shaping the direction of the local and neighbourhood centres as well as local parades in the borough.

7.1.13 The table below sets out the vision and approach for the local centres, parades and AMUs:

Village Plan SPD	Centres covered by Village Plan area	Village Plan vision & approach for Village Plan area
Barnes	Barnes local centre (Barnes High Street and Church Road)	<ul style="list-style-type: none"> <li>• maintain and enhance the character of Barnes as an attractive residential area and as a place that people want to visit;</li> </ul>

Village Plan SPD	Centres covered by Village Plan area	Village Plan vision & approach for Village Plan area
	<p>Castelnau neighbourhood centre</p> <p>White Hart Lane neighbourhood centre (Barnes/Mortlake)</p>	<ul style="list-style-type: none"> <li>• ensure that Barnes High Street, Church Road and White Hart Lane continue to provide a range of shops and services for residents and visitors within an attractive setting;</li> <li>• improve Castelnau shopping area so it provides a more welcoming environment for shoppers and in its role as an important gateway into both Barnes and the borough;</li> <li>• encourage improvements to facilities for younger and older residents;</li> <li>• improvements to areas including the High Street, the river frontage, river wall and towpath; and</li> <li>• reduce the impact of traffic and improve facilities for pedestrians and cyclists, strengthen public transport connections, particularly where they strengthen links and connectivity between different parts of the village.</li> </ul>
Hampton	<p>Hampton Village</p> <p>Hampton Nursery Lands</p>	<ul style="list-style-type: none"> <li>• bring together the different areas of Hampton as a vibrant, caring community with facilities to meet local needs;</li> <li>• provide a more diverse range of shopping;</li> <li>• improve highway conditions, street furniture and signage in Hampton Village;</li> <li>• retain and improve the quality of shopfronts and advertisements; and</li> <li>• maintain and enhance the small parades of shops in Priory Road.</li> </ul>
Hampton Hill	Hampton Hill	<ul style="list-style-type: none"> <li>• continue to be a thriving local centre with a range of shops and community facilities to meet local needs through a good balance of independent shops (as well as multiples) supported by sufficient convenient car parking;</li> <li>• improve the appearance of buildings, particularly shopfronts, and the public realm;</li> <li>• if possible reduce the impact of through traffic, enhance facilities for pedestrians and cyclists and manage parking;</li> <li>• retain and improve the quality of shopfronts and advertisements; and</li> <li>• improve highway conditions, signage and street furniture in the High Street.</li> </ul>
Hampton Wick and Teddington	<p>Hampton Wick neighbourhood centre</p> <p>Kingston Road neighbourhood centre</p> <p>Stanley Road neighbourhood centre</p> <p>Waldegrave Road local</p>	<ul style="list-style-type: none"> <li>• retain Hampton Wick's sense of identity and ensure its centre thrives with a mix of retail and other facilities;</li> <li>• maintain and enhance Hampton Wick's residential areas, public realm, pedestrian routes and open spaces;</li> <li>• improve public transport in Hampton Wick, manage traffic and parking and reduce through traffic; and</li> <li>• protect and improve local shopping parades at Kingston Road, Stanley Road and Waldegrave Road, enabling them to provide shopping and other services to meet local needs.</li> </ul>

Village Plan SPD	Centres covered by Village Plan area	Village Plan vision & approach for Village Plan area
	parade	
Kew	Kew Gardens local centre  Kew Green local parade Sandycombe Road local parade	<ul style="list-style-type: none"> <li>maintain the character of Kew as an attractive residential area with enhancement of community facilities;</li> <li>ensure Kew Gardens shopping parade continues to thrive and provide a shopping and service centre for residents and visitors; and</li> <li>Kew Green and Sandycombe Road to continue to provide local shops and services.</li> </ul>
Mortlake	Mortlake Area of Mixed Use	<ul style="list-style-type: none"> <li>the vision for Mortlake is based on the redevelopment of the Stag Brewery;</li> <li>provide improved functional and physical links to East Sheen centre; and</li> <li>seek an appropriate mix of uses to generate vibrancy and local employment as well as leisure opportunities, including restaurants, cafés, community uses, a museum, boat houses and lower cost units suitable for small businesses.</li> </ul>
Whitton and Heathfield	Heathside (Powder Mill Lane/ Hanworth Road) neighbourhood centre Nelson Road parade of local importance	<ul style="list-style-type: none"> <li>improve Powder Mill Lane shopping parade, which should continue to serve day to day needs.</li> </ul>
Richmond and Richmond Hill	Sheen Road neighbourhood centre  Friars Stile Road neighbourhood centre  Lower Mortlake Road parade of local importance  Kew Road parade of local importance	<ul style="list-style-type: none"> <li>centres to provide for the day to day needs of local residents, with an increase in specialist shops to attract visitors;</li> <li>maintain and improve the quality of shopfronts and signage in Friars Stile Road and Kew Road; and</li> <li>in Sheen Road local centre: <ul style="list-style-type: none"> <li>mitigate the impact of traffic and improve highways conditions and pedestrian convenience, and rationalise existing signage and street furniture; and</li> <li>improve shopping frontages by encouraging consistency and a return to original signage designs.</li> </ul> </li> </ul>
East Twickenham	East Twickenham local centre	<ul style="list-style-type: none"> <li>maintain the character of the area as an attractive residential area;</li> <li>ensure the centre continues to provide a range of shops and services for residents and visitors;</li> <li>retention of Twickenham Studios;</li> <li>redevelopment of Ryde House for education and retail;</li> <li>seek environmental and highway improvements to provide local distinctiveness along Richmond Road including renewal of paving; and</li> <li>reduce the impact of traffic and manage parking to allow residents access to local facilities.</li> </ul>

Village Plan SPD	Centres covered by Village Plan area	Village Plan vision & approach for Village Plan area
St Margarets	St Margarets local centre  Crown Road local parade (part)  St Margarets Road parade of local importance (parade north of the A316)	<ul style="list-style-type: none"> <li>maintain the character of the area as an attractive residential area;</li> <li>ensure St Margarets centre continues to provide a range of shops and services for residents and visitors, protect and enhance local shopping</li> </ul> <p>in the local parades on St Margarets Road (north of the A316) and Crown Road;</p> <ul style="list-style-type: none"> <li>improve streetscape including the area outside of Twickenham Studios; and</li> <li>opportunities to improve the appearance and accessibility of St Margarets Station.</li> </ul>

7.1.14 Local and neighbourhood centres as well as parades are particularly important for households without a car. It is important to continue to protect the latter in line with the Council's aim of providing local shopping opportunities within 400 metres of most people's homes.

7.1.15 The Retail Study 2014 indicates that there is need to provide an estimated 4,250sqm (gross) of Use Class A3/A4/A5 floorspace by 2024 in total outside of the five main centres. Of this figure approximately 1,100sqm (gross) is convenience, and 2,100sqm (gross) comparison retail floorspace. Site allocations, as set out within this Plan, include retail relevant to this level of the hierarchy, to meet this need. However, should development opportunities arise, new retail developments which are in line with this policy in terms of scale, location and impact may help to support these centres.

### Areas of Mixed Use

7.1.16 The Area of Mixed Use boundary delineates the smaller centres and parades in the hierarchy. There are a small number of centres which do not have such a boundary. In these locations proposals are expected to be located within or near to designated shopping frontages where the majority of commercial development is located.

7.1.17 There are a small number of AMUs which are not in the centre hierarchy as their retail function is limited. These are Mortlake, Thames Street (Hampton), Hampton Road (Twickenham) and Crown Road (St Margarets) AMUs. For these centres parts A and C of this policy will apply.

### Sequential Tests & Impact Assessments

7.1.18 National policy and guidance sets out the approach to assessing planning applications when impact and sequential testing is required, drawing out specific requirements for retail and leisure and providing advice on evidence needed.

7.1.19 Impact assessments and sequential tests will need to be proportionate to the scale of the development proposed. Applicants are required to undertake a Retail Impact Assessment in line with the thresholds set out in this policy, which reflect the type of generally small scale retail applications that come forward in this borough.

### The size of retail units and use of conditions

7.1.20 The size of units is also important; new developments in some centres (particularly Richmond) may include provision for larger retail units. However, smaller units which can enhance a centre's sense of identity and attractiveness, should be retained.

7.1.21 Conditions may be applied where necessary to restrict the size of units, or to subdivide shopfronts to reflect the bay widths in the parade, in line with the Council's SPDs on Shopfronts as well as the Village Planning Guidance SPDs.

## Permitted Development Rights

7.1.22 Several changes to Permitted Development Rights affecting change of use to and from retail have been introduced in recent years. Where prior approval is needed, the Council will interpret key shopping areas referred to in the General Permitted Development Order 2015 as being designated key and secondary shopping frontages.

### Residential development in centres

7.1.23 Whilst residential uses can contribute to the overall vitality of a centre, housing on the ground floor contributes less to vitality than most commercial or community uses. Therefore, commercial or community uses will be expected to front the street. Where a proposal is in a designated shopping frontage, policy LP 26 in 7.2 'Retail Frontages' will apply. There is a growing trend to convert the rear of premises to residential use. Where conversion is acceptable, the access to any residential unit should be from the front rather than the rear where practicable.

7.1.24 Residential development contributes to the overall health of centres and to meeting the Borough's housing target. There is scope to increase housing stock in the centres, such as through increased densities or introducing housing in upper floors, provided that this does not lead to an unacceptable loss of commercial or community space, and that the commercial or community uses on the ground floor remain of a viable size.

### Optimising the use of land

7.1.25 Development should optimise the use of buildings and/or land. This could be achieved by implementing an appropriate density or by ensuring that space above ground floor level is well used. Also, it may be possible for mixed use schemes to achieve this through measures such as shared parking, refuse facilities and servicing, amongst other things. The design and layout as well as amenity are important considerations when proposing a mix of uses.

## 7.2 Retail Frontages

### Policy LP 26

#### Retail Frontages

The Council has designated parts of centres as Key Shopping Frontage or Secondary Shopping Frontage. These frontages are identified on the Policies Map and the relevant addresses listed in Appendix 4.

#### Key Shopping Frontages

A. Proposals that result in a loss of floorspace in Use Class A1 in Key Shopping Frontages will be resisted. Other uses converting to retail will be supported, subject to there being no adverse impact on the centre. The Council will seek to retain key facilities including Post Offices.

#### Secondary Shopping Frontages

B. A non-A1 proposal will be acceptable in the secondary shopping frontages only if it:

1. (a) meets community needs (such as a dentist, clinic or health centre, veterinary surgery, gym, fitness studio and facilities which would enable the public better access to police services) and provides a direct service to visiting members of the public, or
- (b) falls within Use Classes A2 to A5, or
- (c) is another commercial use which provides a direct service to visiting members of the public without appointment.

In addition to (A) or (B) above, the proposal must meet the following criteria:

2. the proposed use should retain a 'shop-like' appearance; it should not have a detrimental visual impact on the shopfront and should respect the heritage and character of the centre, taking into account the Village Planning Guidance SPDs;
3. the proposed use has to be complementary to the area's shopping function and provide a direct service to the public; and
4. it will not create an unbroken run of three or more non-A1 units.

**Over-concentration of uses and impact on amenity**

C. The Council will resist proposals that result in an over-concentration of similar uses (such as betting shops, estate agents, restaurants, public houses, bars and take-aways) in any one area and/or would result in an adverse impact on the amenity of nearby users as well as surrounding residential areas, including an adverse cumulative effect.

There are areas of the borough where certain changes of use (including significant extensions in floorspace) will no longer be allowed due to existing concentrations. These include, but are not limited to, the following frontages and/or areas subject to specific restrictions:

Use Class to be restricted <sup>(7)</sup>	Frontage or area subject to specific restrictions
A3 and A4	112-196 (Even) High Street, Teddington
A3	90 - 112 (Even) Kew Road, Richmond
A3	27 - 32 (Consecutive) The Quadrant, Richmond
A3 and A4	Richmond Riverside - Thameside, south from Richmond Bridge as far as Buccleugh Gardens.
A4 and A5	1 - 59 (Odd) and 2-40 (Even) York Street, Twickenham
A4 and A5	1 - 65 (Odd) and 2-50 (Even) London Road, Twickenham
A5	148 - 182 (Even) 191 - 213 (Odd) Upper Richmond Road West, East Sheen

The above areas will be kept under review. Proposals for mixed A1/A3 uses within the above areas will be assessed on a case by case basis.

**Shops selling essential goods<sup>(8)</sup>/Post Offices**

D. In secondary shopping frontages in smaller centres including local parades, changes of use from shops selling (or whose last occupant sold) essential goods to non-A1 uses will be resisted if there is no similar alternative within 400 metres. This applies even if the proposal is acceptable in terms of criteria B & C above.

**Changes of use in non-designated frontages where policy LP 27 does not apply**

E. The Council will consider favourably applications for change of use to any non-A1 use which is a commercial or community use compatible with the retail function of the centre.

**Marketing requirement for changes of use**

F. Where a proposal involves a change of use not supported by policy, the Council will require satisfactory evidence of full and proper marketing of the site. The applicant will be expected to undertake marketing in line with the requirements set out in Appendix 5.

(7) Restaurants and cafes (A3), Drinking establishments (A4), Hot food take aways (A5)

(8) as defined in the supporting text

7.2.1 This policy builds on the approach set out in the Spatial Strategy of maintaining, reinforcing and strengthening the borough's centres and parades. It assists in consolidating the borough's centres and helps define their function in the borough's hierarchy of centres and parades (as set out in policy LP 25 in 7.1 'Development in Centres'). The policy also sets out the locations where A1 uses are best located and it establishes which types of uses are acceptable in designated frontages. In doing this the policy also seeks to protect the existing A1 uses from inappropriate or insensitive development.

7.2.2 Key Shopping Frontages are located in the most central areas, where retail already predominates. Secondary Shopping Frontages are usually adjacent to them in less core positions. They support the Key Shopping Frontages and are also areas where some degree of diversification should be permitted to provide and support choice and variety, whilst still retaining their primarily retail function.

7.2.3 Key and secondary shopping frontages work in tandem with each other to ensure that there is a good balance of uses in centres and that there is sufficient shopping floorspace available to meet identified needs as set out in the Council's Retail Study. Shopping frontages also prevent agglomerations of non-shop uses, which could result in areas with 'blank' frontages from forming where there may be less activity during the day, disruption to the retail continuity and reduction in the variety of uses.

## **Shopping frontages**

7.2.4 The key frontages have been designated on the parades that form the core of the retail centre, and as such they are predominantly comprised of A1 retail uses. A compact retail core fosters comparison shopping and helps to maintain a critical mass of retailers. The loss of A1 space will be resisted and conversions to A1 generally supported.

7.2.5 In Key Shopping Frontages there will be established non-A1 uses. For clarity, a proposal for a change of use from an existing non-A1 use to another appropriate use will generally be acceptable, provided that the proposed use complies with Section B parts 1-3 and Section C of this policy.

7.2.6 The secondary frontages have been designated in areas that, whilst not core, still play an important supporting role to the retail centre. They are mostly A1 retail. A level of diversification may be allowed or encouraged in some circumstances. Additionally, secondary frontages may be designated where diversification has already taken place. The designation would recognise the existing diversity but it would also prevent any further reduction in the area's retail function and character. In particular the 'unbroken run of three' rule prevents 'clumps' of non-A1 uses forming which may result in areas with blank frontages and potentially reduce the variety of shops and services.

7.2.7 The list of uses suitable in secondary shopping frontages included in the policy is not exhaustive and other suitable uses may include B1 and Sui Generis uses, provided they meet the other criteria set out in this policy.

7.2.8 This policy primarily protects the ground floor. It does not apply to a separate unit located to the rear of a unit fronting the main shopping street. It is acknowledged that there may be scope to convert floorspace (including ancillary space) to other uses, provided that the commercial or community use on the ground floor remains of a viable size and that this does not lead to an unacceptable loss of commercial or community space on upper floors. For retail premises, sufficient ancillary space should be retained.

## **Over-concentration**

7.2.9 The Council is concerned that there are areas in the borough where there are concentrations of similar uses, which have a negative effect on amenity and/or the vitality and function of a centre. This policy seeks to resist further concentrations and to prevent an intensification in areas identified as having an existing concentration (see the table on 'Use Class to be restricted' as set out in the policy above). This policy applies to significant extensions of floorspace as well as changes of use. Whether an extension is considered significant will depend upon the total amount proposed and the proportionate increase in floorspace compared to the size of the existing unit. This policy can apply to designated shopping frontages and also to areas outside of them. When assessing proposals, an appropriate area will be used, which reflects the size and scale of the proposed development. For larger centres this may be part of the centre only. The Council's Licensing policy may also be taken into account, in particular the Cumulative Impact Policy.

7.2.10 In addition to the areas to subject to restrictions listed in the table on 'Use Class to be restricted' as set out in the policy above, the Council will manage new fast food takeaways (A5 uses) located within 400 metres of the boundaries of a primary or secondary school. This is in order to support the promotion of healthy foods to school-age children. Please refer to the map within policy LP 30 in [8.3 'Health and Wellbeing'](#) for the extent of this restriction.

## Shops selling essential goods / Post Offices

7.2.11 Section D of this policy applies to all tiers of the hierarchy as set out in policy LP 25 below main centre level. By giving additional protection to shops, which sell essential goods as well as Post Offices, the Council aims to ensure that residents have access to local food shopping and essential services. The Use Classes Order allows for change between retailers selling different goods. This policy gives greater control to protect local food shopping. It applies where a change of use is sought from a shop to a non-A1 use in a secondary shopping frontage, and the existing or last use of the shop was selling essential goods defined as - a general grocer, newsagent, green grocer, baker, butcher, fishmonger and chemist, or a Post Office.

## Changes of use in non-designated frontages where policy LP 27 does not apply

7.2.12 In areas not covered by designated frontages or by policy LP 27 in 7.3 'Local Shops, Services and Public Houses', vacant shop units can provide employment/business opportunities. This may help to provide premises for small businesses and start-ups, which are particularly important in this borough where the proportion of small businesses is high as are business creation rates.

7.2.13 The Council will consider favourably applications for such uses where the buildings can be satisfactorily converted, the proposed use will not adversely affect the centre's retail function and appearance, or amenity, and there is sufficient off street parking where required. Examples are offices and small workshops, medical and veterinary surgeries, solicitors and insurance brokers.

7.2.14 In these locations, where the proposal results in the loss of commercial or community floorspace (including ancillary space) to other uses, the ground floor unit should remain a viable size and there should be no unacceptable loss of commercial or community space on upper floors.

7.2.15 The Council acknowledges that permitted development rights allow the conversion to residential in some areas outside of designated shopping frontages without the need for planning permission.

## Marketing requirements

7.2.16 The borough needs to retain premises in commercial and community use in order to maintain and support centres, protect their vitality and to meet the need for additional retail floorspace. However, there is a need to prevent an unacceptable increase in vacant premises. Satisfactory marketing evidence, in the form of full and proper marketing should be provided in line with Appendix 5. This requirement will apply in designated and non-designated shopping frontages, and it applies to proposals which result in either the complete loss of a commercial or community use or where the loss is considered substantial and is of concern to the Council.

## 7.3 Local Shops, Services and Public Houses

### Policy LP 27

#### Local shops and services

A. The Council seeks to protect local shops and services by the following means:

1. Change of use from premises falling within Use Classes A1 to A5 will not be permitted unless:
  - a. The unit is within 400 metres of a designated shopping frontage; or
  - b. the existing use is inappropriate in terms of access or amenity and living conditions; or
  - c. the proposed use would provide a social or community service or function which outweighs the loss of the facility meeting evidence of a local need.
2. New retail units to serve new housing development should be provided within existing centres. Where there is no existing centre within reasonable walking distance (400 metres), a new shop or shops may be required as part of a new housing development.

3. The Council will require satisfactory evidence of full and proper marketing where a proposal does not meet the above criteria. The applicant will be expected to undertake marketing in line with the requirements set out in Appendix 5.

#### **Public Houses**

B. The Council will resist the loss of public houses. Before accepting the loss of any public house the Council requires satisfactory evidence of full and proper marketing normally for at least 2 years for a full range of appropriate uses (see policy LP 28 Social Infrastructure). The applicant will be expected to undertake marketing in line with the requirements set out in Appendix 5.

#### **Local shops and services**

7.3.1 This policy is designed to ensure that all residents have a shop and services within reasonable walking distance (defined as 400 metres). Shops and services are especially important to elderly or less mobile shoppers, those with young children, those without cars, and are also useful to all others for their top-up and emergency shopping.

7.3.2 The Council recognises that long-term changes in shopping patterns have reduced the need for the number of shop units that would have been necessary in the past. However, the Council recognises that local shops remain essential to many residents. In addition, they serve an important community function and local top-up shopping is needed and valued. Where a proposal involves the loss of a local shop or service, satisfactory evidence of full and proper marketing in line with the requirements set out in Appendix 5 will be required.

7.3.3 Also note that in line with policy LP 30 in [8.3 'Health and Wellbeing'](#), the Council will not permit development of new fast food takeaways (A5 uses) located within 400 metres of the boundaries of a primary or secondary school.

#### **Public houses**

7.3.4 Public houses play an important role and social function in the local community and they add to the local character of an area. Therefore, the Council will resist the loss of public houses. Any proposal that results in the loss of a pub has to firstly provide satisfactory marketing evidence to establish that the pub is not viable (in line with Appendix 5 of this Plan). The pub's potential to provide a community service or function should be included in any marketing exercise.

7.3.5 When assessing a proposal for the change of use from a public house, the Council will take into account the following:

- whether there is another pub within 400 metres;
- whether the use is inappropriate in terms of access or amenity or living conditions; and
- whether the proposed new use would provide a social or community service or function which outweighs the loss of the facility, meeting evidence of a local need.

7.3.6 This policy applies to public houses including the hybrid A3/A4 use (public house with expanded food provision) introduced by amendment to the Use Classes Order in May 2017 (SI 619), and not wine bars. The criteria of policy LP 28 in [8.1 'Social and Community Infrastructure'](#) will be applied when assessing the loss of a pub.

7.3.7 Applicants should also have regard to the [Campaign for Real Ale's \(CAMRA\) Public House Viability Test](#).

## 8 Community Facilities

### 8.1 Social and Community Infrastructure

#### **Policy LP 28**

##### **Social and Community Infrastructure**

A. The Council will work with service providers and developers to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage.

##### **New social and community infrastructure**

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

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

##### **Loss of social or community infrastructure**

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

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

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

##### **Impacts on existing social infrastructure**

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

8.1.1 Social and community infrastructure facilities provide for the health, welfare, social, education, spiritual, recreational, leisure and cultural needs of the community. The provision of adequate community and social infrastructure is essential to support the projected population growth within the borough. Such facilities are often at the heart of local communities; they are important for the quality of life of residents, in the creation of more inclusive and sustainable communities and in helping to promote social interaction and encouraging people to lead more healthy and active lives. It is important that these facilities and services meet people's needs at all stages of their lives and are accessible to all.

8.1.2 This policy covers any type of social and community infrastructure floorspace that is important to the local community. It encompasses a wide range of services, some of which are statutory services such as health and education and the Council will work with partners to ensure that local communities continue to

have access to such services. Others are non-statutory community services such as cultural, play, recreation, sports and faith facilities including those for voluntary or charitable purposes. The Council considers it important to protect such uses and facilities as they play a key role in maintaining and fostering community and social cohesion. Some examples of social and community infrastructure include public services, GP surgeries, nurseries, community centres, public halls, arts and cultural facilities, policing, fire and ambulance services, youth centres, social clubs, indoor sport and recreation facilities, libraries, laundrettes, places of worship, and public houses. This is not an exhaustive list and the Council will determine whether any facility or service is considered to be a social infrastructure or community use. The pre-application process is encouraged and on specific schemes may clarify which policies and requirements apply. Schools and other education facilities, health and social care facilities as well as leisure and recreation facilities are dealt with in more detail in separate policies within this Plan.

8.1.3 Infrastructure provision and needs have been identified with the relevant partner organisations and are set out in the Council's Infrastructure Delivery Plan. There is an increasing need for nursery, education and health provision across the borough. More specific requirements for community facilities may be identified by local communities, for example as part of the Village Planning process or within a Neighbourhood Plan. The Council will work with partners including public and private infrastructure providers and the community and voluntary sector in ensuring the provision of services.

8.1.4 It is recognised that in some instances there may need to be some additional development to support the cost of retaining or re-providing existing social infrastructure uses. Such development may be acceptable provided that the proposal will result in an overall improvement to the existing social and community facilities and services.

### **New social and community infrastructure**

8.1.5 Provision of good quality social and community infrastructure is critical for social cohesion and contributes to the creation of lifetime neighbourhoods, i.e. places where people are able to live and work in safe, healthy, supportive and inclusive environments with which they are proud to identify. The Council will support the provision of new or extensions to existing social infrastructure where it provides for an identified need.

8.1.6 Need is identified on an evidential basis from the Council and its partners strategies and plans, including:

- The Council's Infrastructure Delivery Plan
- The Council's Joint Strategic Needs Assessment
- The Council's School Place Planning Strategy
- The Council's Cultural Partnership Strategy
- Estates Strategies produced by health bodies, such as the NHS England and Richmond Clinical Commissioning Group
- Government departments' Estates Strategies
- The Metropolitan Police Authority's Estates Strategy
- Other local evidence such as community needs identified as part of the Village Planning process or Neighbourhood Plans.

8.1.7 Access for all is important including for the young, old and disabled. The appropriate level of accessibility to the public will depend on the nature of the scheme and its catchment. The types of larger facilities in multi-use buildings that will be visited regularly and by a greater number of people should be located in the borough's centres or areas of good public transport accessibility. Smaller facilities serving a more local catchment should be accessible by walking or cycling. The Council will encourage high quality and sustainable design of social infrastructure including measures to improve its actual, and perception of, accessibility.

8.1.8 Where practicable, social infrastructure and community facilities should be provided in multi-use, flexible and adaptable buildings or co-located with other social infrastructure uses which can increase public access and help to minimise capital or revenue costs to community groups. Multi-use means, for example, that a school uses the school and playing fields during the school day, during term time and the facilities are available for use by the community outside school hours i.e. evenings, weekends and during school holidays. Community use could be individuals, sports and arts clubs, voluntary sector groups or private groups, and can range from informal/occasional bookings through to planned, professional activity. Multi-use already exists in many forms within the borough. The Council will encourage and promote the multi-use of premises, including in independent and free schools and other private or commercial facilities for sports and community purposes, subject to appropriate management arrangements and community use agreements. The combined impact of multi-use facilities needs to be taken into account, including shared parking, hours of use, and the impact these may have on the character and amenity of the area, the living conditions of local residents, as well as consideration as to how flexible spaces will be used e.g. sufficient storage for different users and security considerations.

[New para] The Council's Indoor Sports Facility Needs Assessment highlights the need for new facilities within the borough. Where possible and feasible, such provision should be provided on-site in line with the Council's Indoor Sports Facility Needs Assessment.

### **Loss of social or community infrastructure**

8.1.9 Development pressures and high land values in the borough mean there is pressure to redevelop sites and it can be difficult to find new sites for community use, especially for use by voluntary groups. The Council will resist the loss or change of use of existing social or community infrastructure. Consequently the potential of re-using, refurbishing or redeveloping existing sites for continued social or community infrastructure use must be assessed in order to preserve a sufficient range and amount of such infrastructure across the borough.

8.1.10 To assess the loss of social infrastructure, the Council will require evidence to justify the loss and demonstrate that it is no longer an essential local facility. The applicant must demonstrate that either

1. there is no longer a community need for the facilities or they no longer meet the needs of users and cannot be adapted in any way. This should be based on evidential need and related to the Council's and its partners strategies and plans and may include evidence of a public disposal process. Where the application relates to the loss of a health facility, the requirements of LP 30 will also need to be addressed and written agreement from the Richmond Clinical Commissioning Group, NHS England or other relevant health body must be provided; or
2. the existing facilities are being adequately re-provided in a different way or elsewhere in a convenient alternative location that is accessible to the current community it supports, or that there are sufficient suitable alternative facilities in the locality. Any redevelopment proposal must not lead to or increase any shortfall in provision. Consideration will be given to whether alternative facilities are accessible to all, well located and sustainable.
3. Alongside either 1 or 2 as set out above, it is essential that the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure use for which there is a local need is assessed. This should include a full and proper marketing exercise ongoing for a period of at least two years. As part of the marketing process space should be offered at a reasonable charge for community groups / voluntary sector organisations reflecting its existing use value and condition. More detailed information on marketing requirements is provided in Appendix 5. Where the site is an existing health facility, consideration should first be given to re-using the site for other health facilities and applicants should contact NHS Property Services to discuss their needs for health floorspace in the area.

[New para] Proposals that could result in the loss of an existing indoor sport facility will also be assessed against the Council's Indoor Sports Facility Needs Assessment and the criteria as set out in the NPPF. Early engagement with Sport England is encouraged where a proposal affects an existing indoor sport facility.

8.1.11 In some cases, change might be inevitable, for example to meet the changing needs of users or through multi-use to make continued provision more economically viable. Any strategies produced by third parties demonstrating local need should have been subject to consultation with appropriate bodies to demonstrate the robustness of the evidence to the Council. If a public disposal process has taken place as part of an agreed programme of social infrastructure re-provision which confirms that the disposal of assets is necessary to ensure continued delivery of social infrastructure and related services, this will be taken into account by the Council when assessing proposals against the criteria set out in this policy.

8.1.12 Where the Council is satisfied that the above evidence has been provided and redevelopment away from a social or community infrastructure use or an educational use may be appropriate, redevelopment or change of use for employment generating uses should be considered. Wholly affordable housing schemes would also be supported by the Council where other policy priorities are met to demonstrate wider benefits to meet community needs.

### **Impacts on existing social infrastructure**

8.1.13 Development proposals for major developments are likely to put an additional burden on existing facilities, particularly on education and health infrastructure. Therefore, the potential impact of development proposals on existing social and community infrastructure must be assessed by the applicant as part of the planning application process, supported by evidence, to ensure that there is capacity within the existing infrastructure. For applications for 10 or more residential units, this should be addressed in a Supporting Planning Statement and a Health Impact Assessment, as required (in accordance with the Local Validation Checklist) and/or through an Environmental Impact Assessment (EIA) for projects above the threshold. Where necessary, measures will need to be put in place to mitigate the impacts of development on existing services. This could include financial contributions and / or Planning Obligations (in line with the Council's Planning Obligations SPD), and / or where appropriate, on-site provision of community facilities.

### **Assets of Community Value**

8.1.14 Community groups have a right to nominate buildings or other land as Assets of Community Value where they believe they are of importance to their community's social well-being. If the asset comes up for sale, then the community will be given six months to make a bid to buy it on the open market. The Assets of Community Value process is helpful in testing the viability of community uses as the bidding process will demonstrate whether there are workable proposals to sustain or reuse the premises.

8.1.15 Loss of Assets of Community Value will be strongly resisted in line with the requirements and criteria set out in this policy.

## 8.2 Education

### Policy LP 29

#### Education and Training

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

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

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

8.2.1 London is one of the world's global centres for education and the London Borough of Richmond plays a key role in fulfilling this position. The borough is home to an excellent range of schools, including outstanding and top-performing primary and secondary schools as well as higher education institutions, including St Mary's University.

8.2.2 The Council takes a proactive, positive and collaborative approach to meeting school place requirements. This includes working with partners, including the Education Funding Agency as well as educational providers, to provide the quantity and diversity of school places needed within the borough.

8.2.3 Priority will be given to providing a high standard of education facilities to meet identified needs in the borough. This policy applies to all ages and abilities, including special education needs, and therefore includes childcare, primary and secondary schools, sixth forms as well as higher and further education.

8.2.4 Co-location and multi-use of education facilities with other social infrastructure and community uses will be encouraged where practicable, in line with policy LP 28 in 8.1 'Social and Community Infrastructure'. Multi-use and co-location of facilities contributes to optimising the use of land and can increase the wider community benefits of educational proposals. It can lead to increased public access, particularly of sports facilities (indoor and outdoor) through, for example, the use of school playing fields by professional sport clubs, other schools and community groups. The Council will seek to ensure multi- / community use of schools, including private schools, through appropriate measures, such as Community Use Agreements.

#### Meeting educational needs and delivery of new schools

8.2.5 Under Section 14 of the Education Act 1996, the Council has a duty to ensure the provision of sufficient state-funded school places for all those residents who want them for their children. In accordance with the Academies Act 2010, any new non-voluntary-aided school must in effect be a free school. (Voluntary-aided schools are generally religious or faith schools.)

8.2.6 The Council's ability to meet its statutory duty to provide the number and range of school places has, in recent years, become more challenging as a result of the national freedoms and flexibilities which enable

different providers to come into the market through the free school route. The role of local authorities has been significantly reduced as a result.

8.2.7 Consequently, the Council has to work with a variety of organisations who could, in theory, regard themselves as more independent than the Council's existing community schools and converter academies. In addition, the Council does not know until quite late in the process whether the Department for Education will accept a free school proposal in order that the required places can be created and if, through the Education Funding Agency, they will then be able to find a suitable site for the school. This challenge is compounded by the choices made by parents as to whether to use private sector establishments as an alternative, and due to the Greenwich Judgement<sup>9</sup>, places in local schools cannot be reserved only for children resident in the borough. As a result of the above factors, the Council's overall ability to forecast demand and plan for school places accurately is challenging.

8.2.8 Notwithstanding the above challenge, the School Place Planning Strategy for the borough, which is reviewed regularly, sets out the anticipated likely demand for school places and how this will be met over the next ten years. This includes the demand for additional primary places within each of the ten school place planning areas and when further secondary phase places will be required.

8.2.9 The Council will assist in identifying and, where appropriate, allocating sites for educational uses to support the provision of sufficient state-funded primary and secondary school places during the Local Plan period. In this context, the Council works closely with the Education Funding Agency and the Department for Education to identify possible sites for new schools and, where appropriate, to indicate its support for free school proposals. Access by public transport should be a consideration in reducing traffic impacts when identifying locations for new educational facilities.

8.2.10 The Council recognises that the independent sector makes a contribution to providing education facilities for the borough's children and young people. The Council is generally supportive of proposals which increase the provision of places within that sector, provided they can evidence that they meet local need.

8.2.11 Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan:

- Richmond upon Thames\_College: provision of a new 5-form entry secondary school, a new special needs school and replacement college
- Stag Brewery, Mortlake: provision of a new 6-form entry secondary school, including sixth form
- Ryde House, East Twickenham: provision of a new 2-form entry primary school
- Barnes Hospital, Barnes: provision of a 2-form entry primary school

8.2.12 The Council will work with the Education Funding Agency, Department for Education, landowners and other partners to identify and, where necessary, allocate sites for the future provision of schools to meet the needs of local communities and enable the Council to meet its duty under the Education Act. Ongoing work is taking place to identify other potential sites for educational uses in the borough.

8.2.13 In addition, the Council is committed to working with St Mary's University to address the growing demand for university places by developing a Masterplan in partnership with the University.

### **Employment and skills trainings**

8.2.14 The Council will promote local employment opportunities and training programmes, particularly where there are opportunities arising from developments. Securing the skills to support residents into sustainable employment is a key priority for the Council to support the local economy, to raise the bar further for those with higher levels of skills than London averages and make sure some residents with lower skills are not missing out economically. The construction phase of new development provides opportunities for local employment, apprenticeships and work experience placements. Commercial developments within the borough also bring new employment, apprenticeship and work-experience opportunities for local residents during the end-use phase. Apprenticeships and work experience placements will enable residents to develop an appropriate skill-set for existing and future employment opportunities within the borough.

8.2.15 Consequently, on all development proposals generating 20 FTE (Full Time Equivalent) jobs or more (this also covers end use jobs and those created within one year of completion of the development), the Council will require Local Employment Agreements (LEA), secured through Section 106 agreements, that set out the skills, employment and training opportunities to be delivered from the development. Such an agreement can make use of existing schemes, such as Way2Work, Construction Training Initiative, schemes run by Registered Providers and developers, provided these manage the development related job opportunities.

[New para] The details of the LEA will be subject to negotiation, tailored to site specific circumstances and proportionate to the scale of development proposed, and require developers to use reasonable endeavours to incorporate in their relevant contracts. The contents are expected to cover:

- Forecasting of job opportunities
- Notification of job vacancies
- Local labour target
- Jobs brokerage and skills training
- Apprenticeships and work experience
- Use of local suppliers
- Delivery of specific LEA targets.

A developer can set out justification as to why it may not be possible to deliver any of the requirements highlighted. Further guidance to assist implementation will be provided in a forthcoming SPD.

## 8.3 Health and Wellbeing

### Policy LP 30

#### Health and Wellbeing

Planning, at all levels, can play a crucial role in creating environments that enhance people's health and wellbeing. The Council promotes and supports healthy and active lifestyles and measures to reduce health inequalities.

- A. The Council will support development that results in a pattern of land uses and facilities that encourage:
1. Sustainable modes of travel such as safe cycling routes, attractive walking routes and easy access to public transport to reduce car dependency.
  2. Access to green infrastructure, including river corridors, local open spaces as well as leisure, recreation and play facilities to encourage physical activity.
  3. Access to local community facilities, services and shops which encourage opportunities for social interaction and active living, as well as contributing to dementia-friendly environments.
  4. Access to local healthy food, for example, allotments and food growing spaces.
  5. Access to toilet facilities which are open to all in major developments where appropriate (linked to the Council's Community Toilet Scheme).
  6. An inclusive development layout and public realm that considers the needs of all, including the older population and disabled people.
  7. Active Design which encourages wellbeing and greater physical movement as part of everyday routines.
- B. This policy will be delivered by requiring developments to comply with the following:
1. A Health Impact Assessment must be submitted with all major development proposals.
  2. The Council will manage proposals for new fast food takeaways (A5 uses) located within 400 metres of the boundaries of a primary or secondary school in order to promote the availability of healthy foods.
  3. Existing health facilities will need to be retained where these continue to meet, or can be adapted to meet, residents' needs.
  4. Applications for new or improved facilities or loss of health and social care facilities will be assessed in line with the criteria set out in the Social and Community Infrastructure policy.

### Healthy Lifestyles

8.3.1 Health and wellbeing is a cross-cutting theme, which has links with many other parts of the Local Plan.

8.3.2 The environment in which we live is a key determinant in people's health and wellbeing. The planning system plays an important role in influencing the built and natural environment and therefore plays a key role in the physical and mental wellbeing of the population. A healthy environment can promote wellbeing and healthy lifestyles for all and can contribute to a reduction in health inequalities.

8.3.3 The Joint Strategic Needs Assessment (JSNA) for the borough identifies that a high proportion of the population have unhealthy lifestyles. Unhealthy lifestyles, influenced by the environments in which we live, are contributing to a rise in preventable illnesses such as diabetes, obesity and cardiovascular and respiratory diseases. Prevention of ill-health by helping people to live healthier lives in order to prevent avoidable illness, is a major focus of the health services. Healthy and active people tend to be less dependent

on health and social care services so there are tangible economic benefits in encouraging and making it easy for the population to lead healthy lifestyles.

8.3.4 Planning can play a part in facilitating the creation of healthy environments. Development should result in a pattern of land uses and facilities that make the healthy choice the most convenient and attractive option for residents, helping them to lead healthier lives more easily.

8.3.5 Policy LP 44 in [11.1 'Sustainable Travel Choices'](#) promotes active travel such as cycling and walking, including easy access to public transport. Policy LP 1 in [4.1 'Local Character and Design Quality'](#) ensures that walking and the public realm should be designed to be safe and accessible for all ages and levels of disabilities. A clearly signposted street network with way-marking for walking (in distance and minutes) to destinations is important in encouraging and facilitating walking as a sustainable mode of travel. The Council will seek inclusion of signage on major development sites.

8.3.6 The borough's extensive provision of parks and open spaces enable local communities to lead lifestyles with greater levels of physical activity, resulting in better physical and mental health improvements, reduced stress levels and increased social interaction. These spaces provide a vital free resource in which people of all ages can play, exercise, relax and enjoy the natural world, so easy access for all residents to high quality open and natural space is important, particularly within identified areas of deficiency (see policy LP 31 in [8.4 'Public Open Space, Play Space, Sport and Recreation'](#)). Parks and open spaces are particularly important in promoting activity in young children thereby targeting the increasing childhood obesity levels in the borough. Children's play space and outdoor 'green gyms' for use by the whole community are encouraged.

8.3.7 Access to local community facilities, services, shops and meeting places such as community centres and local pubs is important in facilitating social interaction and general community wellbeing and happiness. In line with policy LP 28 in [8.1 'Social and Community Infrastructure'](#), co-location of community facilities such as healthcare services and leisure centres is encouraged.

8.3.8 Access to local healthy food is another important part of a healthy community. Allotments and community food growing is important not only in the provision of fresh, healthy and locally produced food, but also in facilitating gentle exercise, fresh air and interaction with the natural environment which is known to have positive effects on mental wellbeing. New development should provide, where possible, opportunities for households to own or have access to space to grow food, for example roof or communal gardens or allotments. Also see policy LP 32 [8.5 'Allotments and Food Growing Spaces'](#).

## **Older people**

8.3.9 Life expectancy has been increasing over time and there is a national trend towards an ageing population. The borough has the highest proportion of people aged over 75 and living alone in London and there are increasing numbers of older people living at home with long term physical and mental conditions such as dementia. Planning can play a role in the creation of environments and a public realm that are inclusive and accessible for the older population, including for those with dementia.

8.3.10 Design of the built environment should specifically consider the needs of the older population such as more seating opportunities and benches. A high quality, inclusive and accessible urban environment will enable the older population to remain independent and active for longer, thereby reducing the need for extensive adaptations to buildings.

8.3.11 Housing development should consider the needs of the older population. Opportunities to enable older people to downsize is recognised in policy LP 35 in [9.2 'Housing Mix and Standards'](#), along with higher standards for inclusive access, and new accommodation should meet identified local needs as set out in policy LP 37 in [9.4 'Housing Needs of Different Groups'](#).

## **Health Impact Assessment**

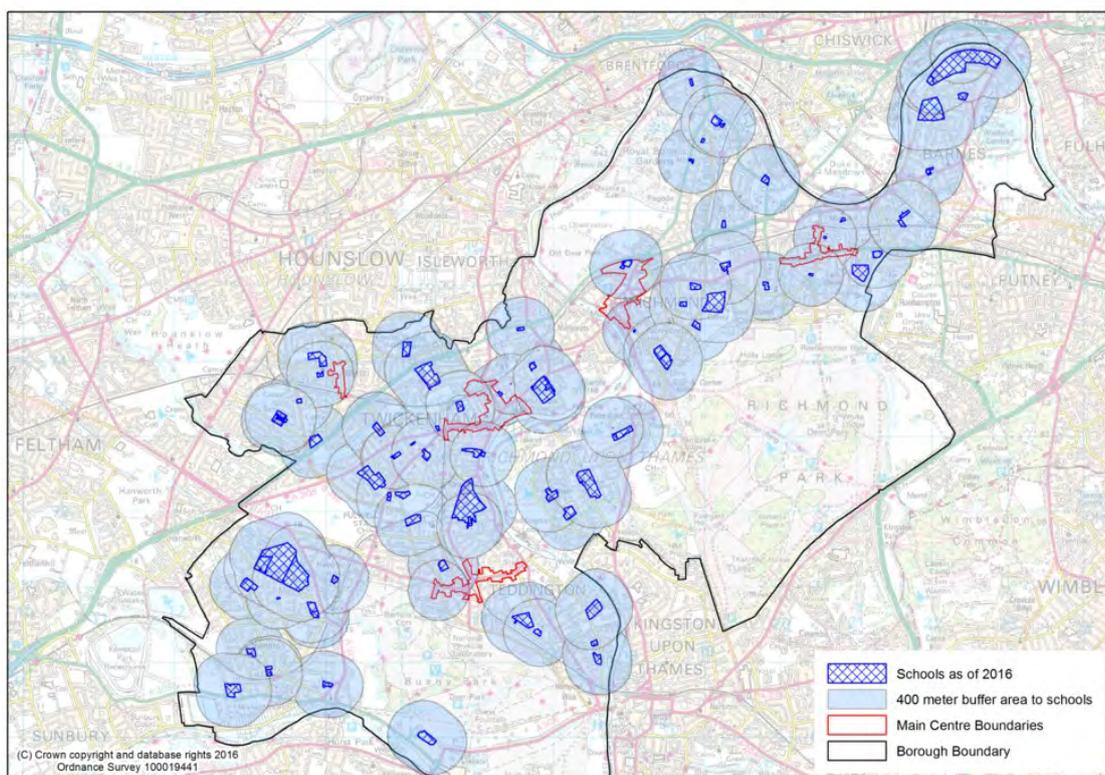
8.3.12 A Health Impact Assessment (HIA) must be submitted with all major applications. A HIA should assess the health impacts of a development, identifying mitigation measures for any potential negative impacts as well as measures for enhancing any potential positive impacts.

## Takeaways

8.3.13 There is an emerging obesity issue in the borough, particularly in children. Childhood obesity amongst school age children is a concern as evidence suggests that obese children are more likely to be obese adults and are at an increased risk of developing further health difficulties. Access to fast food takeaways can influence the ability of individuals to adopt healthy lifestyles and have the potential to undermine healthy eating initiatives that may be in place at the school. Therefore this policy focuses particularly on managing access to fast food takeaways in close proximity to schools.

8.3.14 The Council will consider proposals for fast food takeaways located within 400 metres of the boundaries of a primary or secondary school with regard to the nature of the proposal, its contribution to healthy food availability and its relationship to the existing provision of A5 outlets. 400m is a 5-10 minute walk and it is suggested that this is the maximum distance that students would walk to and back from in their lunch break. Outside of these 400m 'management' zones, applications for fast food takeaways will be considered in line with other policies in the development plan.

8.3.15 The following map shows the existing schools within the borough (as of May 2016) and the associated 400 metre buffer area, which are the 'management' zones for fast food takeaways:



## Health Infrastructure

8.3.16 Health facilities should provide quality care to local communities and be responsive to patient needs. The Richmond Clinical Commissioning Group (CCG) is responsible for the planning and commissioning of health care services for the borough. The CCG works closely with NHS England to deliver primary care services and the Council will work with the CCG and NHS England to support the provision and integration of health and social care facilities in the borough.

8.3.17 There is pressure on health facilities across the borough with some shortfall in GP floorspace in each of the four commissioning clusters in the borough and a need for greater provision of pharmacy services. Existing health facilities should be protected and the provision of new or improved facilities appropriate to

local needs is encouraged. Applications for new or loss of health and social care facilities will be considered in line with the criteria of policy LP 28 in 8.1 'Social and Community Infrastructure' and paragraph 8.1.10 sets out that written agreement of the relevant health body must be provided to assess the loss of any existing health facilities.

## 8.4 Public Open Space, Play Space, Sport and Recreation

### Policy LP 31

#### Public Open Space, Play Space, Sport and Recreation

A. Public Open Space, children's and young people's play facilities as well as formal and informal sports grounds and playing fields will be protected, and where possible enhanced. Improvements of existing facilities and spaces, including their openness and character and their accessibility and linkages, will be encouraged.

New open spaces, play facilities and formal and informal land for sport and recreation should be linked to the wider Green Infrastructure network as they play an important role in creating social cohesion, encouraging and promoting healthier and more active lifestyles.

#### Impacts on existing provision

B. The Council will require all major development proposals in the borough to meet the Public Open Space, play space, and playing fields and ancillary sport facilities needs arising out of the development by requiring the following:

1. **Public Open Space:** applicants should provide an analysis of existing open space provision in line with the Council's accessibility standards for travel to open spaces.  
Where there is inadequate existing provision and limited access to such facilities, publicly accessible facilities will be expected on site to mitigate the impacts of the new development on existing provision.
2. **Play space:** applicants should provide a play and child occupancy assessment to determine whether the proposal will lead to an estimated child occupancy of ten children or more, by using the Council's child yield calculator as set out in the Planning Obligations SPD. In addition, an assessment of existing play facilities within the surrounding area will be required.  
Where the assessment demonstrates an estimated child occupancy of ten children or more, the development proposal should make appropriate and adequate provision of dedicated on-site play space by following the London Plan benchmark standard of 10sqm per child.  
The Council will seek to integrate new major development within existing village areas and neighbourhoods. Therefore, new dedicated on-site play space should be made publicly accessible.
3. **Playing fields and sport facilities:** applicants should assess the need and feasibility for on-site provision of new playing fields and ancillary sport facilities in line with the borough's Playing Pitch Strategy.
4. Where on-site provision of Public Open Space, play space or new playing fields and ancillary facilities is not feasible or practicable, the Council will expect existing surrounding facilities and spaces to be improved and made more accessible to the users and occupiers of the new development through, for example, improved walking and cycling links or enhancements of play space or existing playing fields and associated sport facilities. Financial contributions will be required to either fund off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development.

8.4.1 National policy and guidance states that existing open spaces, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

8.4.2 The Council has produced assessments of need for open space (including play space), sports and recreation facilities, including opportunities for new provision, as well as a borough-wide Playing Pitch Strategy. These, together with the site-specific open space and play space needs assessments for major developments, will provide the starting point for assessing any proposals that could lead to a loss of, or could impact on, existing facilities.

8.4.3 Open spaces, play spaces and sport and recreation facilities are important components of social infrastructure. The Council will not support gated or segregated developments and major development proposals should strike a balance between on-site private amenity space, semi-private and publicly accessible provision. There is an expectation for play spaces to be made publicly accessible, which may also assist in addressing the need for on-site Public Open Space provision. This will also contribute to creating inclusive environments and developments that integrate with existing neighbourhoods and local communities, thus fostering social cohesion.

8.4.4 The extensive provision of parks and open spaces in the borough, including formal and informal land and facilities for sport and recreation, close to homes and places of work, will contribute to encouraging healthier lifestyles as well as increased walking and cycling with consequential health benefits. Parks and open spaces are particularly important in promoting activity in young children, thereby targeting the increasing childhood obesity levels in the borough. Easy access for all residents to high quality Public Open Space, play space and other land for formal or informal recreation is important, particularly within identified areas of deficiency.

### **Public Open Space**

8.4.5 The borough benefits from many open and green spaces that contribute greatly to its unique environment, distinctive character and recreational opportunities. This policy seeks to maintain, and where possible improve, the quality and provision of, Public Open Space in the borough, particularly in areas identified as being deficient in Public Open Space.

8.4.6 There is no formula for calculating the provision of on-site Public Open Space. The aim is to achieve an appropriate balance alongside the provision of private and semi-private spaces. Implementing fixed standards could undermine the ability to achieve development proposals that maintain, and where appropriate enhance, the character of an area. It is the overall design and layout, taking all factors into account, including different uses and occupiers, design quality and inclusiveness, that will determine the appropriate balance between on-site private amenity space, semi-private and publicly accessible provision.

8.4.7 Opportunities to create new Public Open Space will generally be limited in this borough as many areas are already developed or protected open land. However, there are areas of Public Open Space deficiency, as identified on the Policies Map, which are derived by applying a 400 metre buffer area to designated Public Open Space. Adjustments to the 400m buffer area have been made at the following locations to reflect specific circumstances:

- Teddington (along Harrowdene Gardens, Fairfax Road) / Bushy Park: adjustments have been made at this location to take account of the combination of reduced accessibility over the railway line, and limited access points into Bushy Park; and
- Feltham/Hounslow Junction: the triangle of land has been included in the areas of Public Open Space deficiency to take into account reduced access due to the railway lines.

8.4.8 New major developments may lead to increases in usage and may therefore put an additional burden and pressure on the capacity of the existing provision. By using the accessibility standards as set out in the

paragraph below as well as the designated areas of Public Open Space deficiency, applicants should provide an analysis of existing open space provision relevant to the development site.

8.4.9 Where there is inadequate existing provision, or limited access to such facilities, to serve the new development, on-site Public Open Space will be expected in order to mitigate the impacts of the new development on the existing provision. In line with the Council's Open Space Assessment, the following accessibility standards will be applied for assessing travel to open space provision from new development sites:

- 15 minute walk time (1200m) - for Parks and Gardens
- 15 minute walk time (1200m) - for Natural and Semi-natural Greenspace
- minute walk time (400m) - for Amenity Greenspace (including small local parks and open spaces as well as pocket parks)

8.4.10 It is acknowledged that on-site provision may not be feasible or practicable for every major development site, but this will be assessed on a case-by-case basis, taking account of the existing open space provision relevant to the development site. Where it has been accepted by the Council that on-site provision cannot be made, the Council will expect existing surrounding open spaces to be improved, and where appropriate made more accessible to the users and occupiers of the new development. Financial contributions may be required to either fund new off-site provision, or improvements and enhancements of existing facilities, including access arrangements, in order to mitigate the impacts of new development.

### **Play space**

8.4.11 This policy seeks to maintain, and where possible improve, the children's and young people's play facilities in the borough. As set out in the Council's Open Space Assessment, the borough is generally well served with play spaces that are of high quality.

8.4.12 New development, where the estimated child occupancy is ten children or more, could lead to increased usage of, and therefore place additional burdens and strains on, existing facilities. Consequently, developers for major applications will be required to submit a child occupancy assessment in line with the Council's child yield calculator as set out in the Planning Obligations SPD. Where the assessment demonstrates an estimated child occupancy of ten children or more, the development proposal should make appropriate and adequate provision of dedicated on-site play space by following the London Plan benchmark standard of 10sqm per child.

8.4.13 In addition, the applicant should provide an assessment of the existing provision of play space within reasonable walking distance from the site. In line with the London Plan, reasonable walking distances for assessing play space requirements are:

- 100 metres for under 5 year olds,
- 400 metres for 5-11 year olds, and
- 800 metres for 12+ age group.

8.4.14 Where the assessment of existing play facilities within the surrounding area demonstrates sufficient and high quality provision, on-site provision of play facilities may not be necessary, but this will be assessed on a case-by-case basis. Financial contributions may however be required to either fund new off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development.

8.4.15 Further guidance on the appropriate level of provision for play and informal recreational spaces in developments is set out in the Mayor's 'Supplementary Planning Guidance on Shaping Neighbourhoods: Play and Informal Recreation'.

### **Playing fields, playing pitches and sport**

8.4.16 This policy seeks to protect all public and private sports grounds including playing fields, playing pitches, recreational areas, outdoor swimming pools, outdoor 'green gyms', courts and greens as well as

private open space in recreational use. Such facilities and spaces make a significant contribution to the borough's unique character, openness and the wider Green Infrastructure network. Enhancements and improvements to existing facilities, including new, extended or enhanced community use, are encouraged.

8.4.17 Proposals that could affect the loss or the quality of a playing field will be assessed against the borough-wide Playing Pitch Strategy, the criteria as set out in the NPPF as well as the Sport England Policy on planning applications for development on playing fields. Early engagement with Sport England will be required where a proposal affects a playing field or sports pitch.

8.4.18 The Council will resist the loss of a playing field unless the proposal meets the exceptional circumstances test as set out in the Sport England policy. Where a proposal involves the loss, or impact on the size or quality, of a playing pitch, the applicant has to submit a full assessment demonstrating how the relevant guidance, policies and criteria have been addressed. There is also an expectation that overall the development will deliver an increase and enhancement of sports facilities, provision of wider public benefits, including public access, and therefore enabling and promoting physical activity and encouraging healthier lifestyles and habits for all ages.

8.4.19 It is recognised that private sports facilities assist in meeting the wider sports needs of this borough as well as other neighbouring boroughs. Owners of private facilities are encouraged to make them available for public access and use.

8.4.20 Indoor sport facilities are covered by policy LP 28 in [8.1 'Social and Community Infrastructure'](#).

## 8.5 Allotments and Food Growing Spaces

### Policy LP 32

#### Allotments and food growing spaces

The Council will protect existing allotments and support other potential spaces that could be used for commercial food production or for community gardening, where possible.

The value of the allotment space in visual, ecological, biodiversity and historical terms will also be taken into account where there is development pressure on the land. In the highly unlikely event of allotments becoming surplus to requirements, other open space uses will be considered first, particularly where the existing allotment is in an area identified as deficient in Public Open Space provision.

8.5.1 Allotments are an important component of open space and offer a diverse range of benefits for people, communities and environments to build healthier communities and promote healthy living. They provide recreational value, support biodiversity and landscape quality, contribute to physical and mental wellbeing, provide the possibility to grow fresh produce and contribute towards a healthy lifestyle that is active, sustainable and socially inclusive.

8.5.2 There are currently 24 allotment sites in the borough that are managed by the Council, nine of which are designated as statutory allotments. All apart from three sites are on Council owned land and the remainder are on Crown land. Statutory allotments have legal protection and these sites cannot be sold or used for other purposes without the consent of the Secretary of State. Allotments are an open community use and are appropriate within Metropolitan Open Land. Most of the non-statutory allotments are designated as other open land designations such as Green Belt, Metropolitan Open Land and Other Open Land of Townscape Importance and as such are protected from inappropriate development.

8.5.3 Allotments address individual and social well being, by offering physical activity and outdoor exercise, a sense of pride and achievement and the production of good value and nutritional fruit and vegetables. However, they have a wider role as they form a part of the open space resource of the borough and can be a focus of educational interest and public engagement, neighbourliness and social solidarity. Allotment sites also make a contribution to the important areas of biodiversity and sustainability. It is worth noting that family members and friends often join in with activities on the allotments or share in its produce. The value

is therefore not confined to the individual plot holders but spreads outwards in a ripple effect, representing an important opportunity for community interaction.

8.5.4 The Borough's Open Space Assessment identified an unmet demand for allotments and therefore the existing overall area of allotments should be retained. However, it is unlikely that the Council would acquire completely new sites to meet this fluctuating demand, and the Council's Allotment Strategy identified that it is not necessary to consider the expansion onto new sites beyond existing site boundaries.

8.5.5 Where appropriate, the provision of new allotments or other food growing space, alongside the provision of other private, semi-private and public open spaces, will be supported if opportunities arise as part of new developments.

## 8.6 Telecommunications

### Policy LP 33

#### Telecommunications

The Council will promote the enhanced connectivity of the borough through supporting infrastructure for high speed broadband and telecommunications.

Applications for telecommunications development (including for prior approval under Part 16 of the General Permitted Development Order, or any other such future Order) will be considered in accordance with national policy and guidance and the following:

1. The applicant will need to submit evidence to demonstrate that all options for sharing of existing equipment, including with other operators, and erecting masts on existing tall buildings or structures, have been fully explored before considering the erection of new structures or facilities.
2. Visual impacts of telecommunications proposals should be minimised, in line with policies on Local Character and Design, particularly on roof tops.
3. The applicant has demonstrated that the development will operate within the International Commission on Non-Ionizing Radiation Protection Guidelines for public exposure.

8.6.1 National policy sets out guidance on the provision of high quality communications infrastructure, which is essential for sustainable economic growth. Modern telecommunications systems are an essential component in today's economy. It is recognised that there are parts of the borough which have poor mobile phone reception as well as broadband coverage, such as Ham and Petersham. High speed broadband technology will also enhance the provision of local community facilities and services. Therefore, the Council supports telecommunications infrastructure and high speed broadband that ensures the continued economic and social success of the borough, particularly as businesses and local communities rely on access to modern technology. This policy seeks to ensure that new telecommunications infrastructure is sited appropriately and that the number of sites used is minimised where possible.

8.6.2 It is important to keep the number of masts and sites to a minimum as an over-concentration of equipment and installations can have harmful impacts on the borough's unique and distinctive character. Therefore, there is an expectation that existing masts, buildings and other structures are used wherever possible, which includes sharing facilities with other operators, unless the need for a new site has been justified and accepted by the Council. Where new sites or structures are required, equipment should be sympathetically designed and camouflaged where possible. In addition, the Council supports the removal of redundant telecommunications infrastructure.

8.6.3 Applications for telecommunications development (including for prior approval under Part 24 of the General permitted Development Order) should have the necessary evidence to justify the proposed development. This includes:

- The outcome of consultation with organisations with an interest in the proposed development (e.g. if a mast is to be installed near a school);
- For an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure of the development will not exceed International Commission on Non-Ionising Radiation Protection guidelines;
- For a new mast or base station, evidence the applicant has examined erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

## 9 Housing

### 9.1 New Housing

<b>Policy LP 34</b>		
<b>New Housing</b>		
A. The Borough's target is 3,150 homes for the period 2015-2025. This target will be rolled forward until it is replaced by a revised London Plan target. The Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies.		
B. The following amounts of housing are indicative ranges in these broad areas of the borough to 2025:		
Area	Wards	Approx. No of units
<b>Richmond</b>	Ham, Petersham and Richmond Riverside; South Richmond; North Richmond; Kew	1000-1050
<b>Twickenham</b>	Twickenham Riverside; St Margarets and North Twickenham; South Twickenham; West Twickenham	1000-1050
<b>Teddington and the Hamptons</b>	Hampton North; Hampton; Fulwell and Hampton Hill; Teddington; Hampton Wick	650-700
<b>East Sheen</b>	East Sheen; Mortlake and Barnes Common; Barnes	400-500
<b>Whitton</b>	Whitton; Heathfield	100

9.1.1 The Further Alterations to the London Plan (FALP) confirmed in the published London Plan 2015 a target of 3,150 homes for 2015-2025 for the borough equating to 315 homes per annum. Boroughs are required to seek to augment targets to address need. The London Plan states this target will be reviewed by 2019/20 and a full review of the London Plan is expected to commence in 2017. The Council will, as necessary, undertake a full or partial review of the Local Plan in light of the content of any new adopted London Plan which will include an assessment of its identified constraints and opportunities affecting housing delivery.

9.1.2 The strategic dwelling requirement takes account of net housing gain from all sources, including site-specific proposals, large and small sites, conversions and remodelling as well as redevelopment and new build.

9.1.3 A housing trajectory is set out in the annual Authority's Monitoring Report to demonstrate delivery against the London Plan target. This is required by the NPPF and identifies and updates annually a supply of specific deliverable sites sufficient to provide five years worth of housing. This is assessed against the housing requirements together with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.

9.1.4 As at 1 April 2015 the housing land supply in the borough potentially provides for 2154 units over the next five years which is 579 units more than the target supply in the London Plan, and another potential 1875 units in years six to ten. The borough is therefore on course to meet and exceed the strategic dwelling requirement. This is reflected in the broad expected pattern of future housing land supply set out in policy LP 34.B which sets out indicative ranges for the broad areas and are not to be regarded as any lower or upper limit, as the overall target is to be exceeded. The site allocations as set out within this Plan will contribute to this delivery.

9.1.5 The Borough SHMA concludes that the unconstrained demographic-based need for housing in the borough is for around 1,047 dwellings per annum in the 2014 - 2033 period - linked to the GLA projections. This is at the bottom end of the range identified by the demographic projections but is consistent with past trends in population growth. In reality, taking account of limited land supply it is expected growth will be lower. In accordance with national guidance, Local Plans should provide land to

meet those needs in full, insofar as their areas have the sustainable capacity to do so, as defined by other policies and having regard to constraints.

9.1.6 The borough is characterised by large areas of protected open land and constraints such as flood risk, and the remaining area is built up, much of it being within designated Conservation Areas. As such there are few large potential housing sites available and there is pressure on land for other key uses including schools and employment to support the achievement of sustainable communities. The Council will encourage higher density development in more sustainable locations, such as main centres and areas better served by public transport, subject to compatibility with established character. Development should optimise housing provision for different types of location within the relevant density range taking into account the London Plan Density Matrix. This guidance, along with local factors, such as proximity to facilities and to public transport routes, and the character of the surrounding area, will be taken into account in reaching the appropriate density for a particular site. Policy LP 1 in [4.1 'Local Character and Design Quality'](#) and policy LP 2 in [4.2 'Building Heights'](#) provide further guidance on achieving higher densities taking account of local townscapes and landscapes. These are supported by a number of housing and design/character related SPDs. Some additional housing will also be provided through conversions and through change of use to housing from other uses where this would not conflict with other policies.

9.1.7 Proposals should optimise the potential of sites. The majority of housing delivery in the borough is expected to be on previously developed land. Even some cleared sites within the borough generally have a former use, while the majority of open land within the borough that would be regarded as greenfield is covered by protective designations and thus other policies in this Plan would prevent building on greenfield sites.

9.1.8 There is a need to retain land in employment use, as set out in policy LP 40 in [10.1 'Employment and Local Economy'](#), and the Borough SHMA takes into account the likely level of housing need to meet job growth forecasts. Housing delivery against the borough target is capable of being met without the release of employment land, although there is potential for housing gain on employment land through mixed use schemes which retain or enhance the level of existing employment floorspace.

9.1.9 The Housing and Planning Act 2016 introduced a requirement for local authorities to publish a statutory brownfield register and the Government will establish a new delivery test on local authorities. These are intended to maximise the use of brownfield land and ensure delivery against the number of homes set out in Local Plans. These tools are expected to be relevant to the implementation and delivery of this policy.

## 9.2 Housing Mix and Standards

### Policy LP 35

#### Housing Mix and Standards

- A. Development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. The housing mix should be appropriate to the site-specifics of the location.
- B. All new housing development, including conversions, are required to comply with the Nationally Described Space Standard.
- C. All new housing development, including conversions, should provide adequate external space. Purpose built, well designed and positioned balconies or terraces are encouraged where new residential units are on upper floors, if they comply with policy LP8 Amenity and Living Conditions. Regard should be had to the Council's Residential Development Standards SPD as appropriate.
- D. Amenity space for all new dwellings, including conversions, should be:
- private, usable, functional and safe;
  - easily accessible from living areas;
  - orientated to take account of need for sunlight and shading;
  - of a sufficient size to meet the needs of the likely number of occupiers; and
  - accommodation likely to be occupied by families with young children should have direct and easy access to adequate private amenity space.
- E. 90% of all new build housing is required to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings' and 10% of all new build housing is required to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings'.

9.2.1 In order to provide for the needs of the borough's future population whilst retaining the character of established residential areas new development should provide family sized accommodation. This will provide for a range of family needs and single person households who need accommodation for visitors or home-working. There are an increasing proportion of one person households and on appropriate sites an element of small units (1 bedroom or studios) will also be required. A mix is expected to accommodate the needs of both young and old people, including options for downsizing.

9.2.2 The Borough SHMA supports this approach, finding that an overall mix of market housing should be delivered, including family housing and options for older households to downsize (which can then release existing larger family homes for other households). To accord with LP 35.A the appropriate mix should be considered on a site by site basis having regard to its location, the existing stock in the locality and the character of an area and take account of existing infrastructure capacity such as schools and transport.

9.2.3 Housing standards for internal and external space and inclusive access apply to all tenures. The appropriate mix for affordable housing is set out in policy LP 36 in [9.3 'Affordable Housing'](#).

9.2.4 It is recognised that adequate space in the home has an effect on health, diversity and community cohesion and that insufficient space provision in the housing stock will therefore impact on local services. It is an important issue in the borough given the scarcity of housing land supply and particularly to prevent sub-standard accommodation in small units. It is important to make efficient use of land and cater for changing lifestyles, including home working, and accord with requirements for inclusive access.

9.2.5 The Council has therefore adopted the Nationally Described Space Standard and the optional higher Building Regulations Part M for inclusive access.

9.2.6 The Nationally Described Space Standard sets a minimum ceiling height of 2.3 meters for at least 75% of the gross internal area of the dwelling. Following the approach set in the London Plan to address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.

9.2.7 Unlike the other standards in this policy, Part M of the Building Regulations generally does not apply to dwellings resulting from a conversion or a change of use.

9.2.8 The Building Regulations M4 (2) and M4 (3) require step free access. In non-lift serviced multi-storey development where step free access is not viable, assessments should be submitted to demonstrate that the inclusion of a lift would make the scheme unviable or mean that service charges are not affordable for intended residents. If this is satisfactorily evidenced, then the units above or below the ground floor that cannot provide step free access would only need to satisfy the requirements of M4(1) of the Building Regulations.

9.2.9 Part M4 (3) of the Building Regulations regarding 'wheelchair user dwellings' distinguishes between 'wheelchair accessible' (a home readily useable by a wheelchair user at the point of completion) and 'wheelchair adaptable' (a home that can be easily adapted to meet the needs of a household including wheelchair users). M4 (3) wheelchair 'accessible' should only be applied where the local authority is responsible for allocating or nominating a person to live in that dwelling.

9.2.10 Where developments are not able to meet policy requirements for housing mix and standards, the applicant should identify the shortcomings and demonstrate reasons why, including that suitable alternative layouts or provision such as alternative amenity space in the form of roof terraces, roof gardens and balconies (in accordance with policy LP 8 in [4.8 'Amenity and Living Conditions'](#) which also considers the impact on existing occupants) have been considered and incorporated wherever possible.

9.2.11 For amenity space, while front garden or courtyard space can contribute to the overall quantum, this should generally not form a significant proportion of the provision unless it can be demonstrated that it meets the tests set out in the above policy particularly that it can be considered functional and safe.

9.2.12 The Residential Development Standards SPD will be updated to provide further guidance.

## 9.3 Affordable Housing

### Policy LP 36

#### Affordable Housing

A. The Council expects:

- a. 50% of all housing units will be affordable housing, this 50% will comprise a tenure mix of 40% of the affordable housing for rent and 10% of the affordable intermediate housing.
- b. the affordable housing mix should reflect the need for larger rented family units and the Council's guidance on tenure and affordability, based on engagement with a Registered Provider to maximise delivery.

Where on-site provision is required, an application should be accompanied by evidence of meaningful discussions with a Registered Provider which have informed the proposed tenure, size of units and design to address local priorities and explored funding opportunities.

B. A contribution towards affordable housing will be expected on all housing sites. The following requirements apply:

- a. on all former employment sites *at least* 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.
- b. on all other sites capable of ten or more units gross 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.
- c. on sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out below and in the Affordable Housing SPD.

No. of units proposed (gross)	% Affordable Housing		
	For conversions and reversions (where there is no loss of former employment floorspace.	For new build development or redevelopment (where there is no loss of former employment floorspace)	For any units replacing employment floorspace
9 units	36%	45%	90%
8 units	32%	40%	80%
7 units	28%	35%	70%
6 units	24%	30%	60%
5 units	20%	25%	50%
4 units	16%	20%	40%
3 units	12%	15%	30%
2 units	8%	10%	20%
1 unit	4%	5%	10%

C. In accordance with A and B, the Council will seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. The Council will have regard to:

- a. economic viability;
- b. individual site costs;
- c. the availability of public subsidy; and
- d. the overall mix of uses and other planning benefits.

D. Where a reduction to an affordable housing contribution is sought from the requirements in A and B on economic viability grounds, developers should provide a development appraisal to demonstrate that schemes are maximising affordable housing. The developer will be required to underwrite the costs of a Council commissioned economic viability assessment. The Council will rigorously evaluate such appraisals and:

- a. assess if the maximum reasonable amount of affordable housing is based on delivering the appropriate tenure, unit sizes and types that address local needs.
- b. consider whether it is necessary to secure provision for re-appraising the viability of a scheme prior to implementation to secure contingent obligations.
- c. in most circumstances the Existing Use Value plus a premium (EUV+) approach to assessing benchmark land value in development appraisals and viability assessments should form the primary basis for determining the benchmark land value.

9.3.1 The borough has one of the highest average house prices in the UK, and a continuing need for affordable housing, particularly for family homes. In the period from 2014 to 2033 a net deficit of 964 affordable homes per annum is identified in the Borough SHMA, demonstrating the need for affordable homes remains substantial and justifies the continued policy approach. In the context of the borough small sites make a significant contribution to housing supply and the cumulative impact of these sites should contribute to affordable housing provision, justified by the evidence base and local circumstances.

9.3.2 The policy applies to all new housing development, including changes of use for wholly residential and mixed use sites incorporating residential use, where planning permission is required. The affordable housing provision (on-site or off-site) or any financial contribution should be calculated in relation to gross rather than net development i.e. it should be based on the total number of units proposed in the final development. In London the majority of development is brownfield and does not need to be incentivised, as in many cases the building will only have been made vacant for the sole purpose of re-development, therefore the Vacant Building Credit will not apply. A flowchart to follow, setting out the policy requirements and the mechanism for assessing the contributions from individual sites is set out in the Affordable Housing SPD, for each proposal to make an adequate contribution towards affordable housing which is directly, fairly and reasonably related in scale and kind to the development proposed. It is considered necessary to make it acceptable in planning terms, and the absence of an obligation will be considered as undermining the Council's housing strategy and harm the provision of affordable housing in the area.

9.3.3 The Council's Housing Strategy 2013-17 sets out the Council's housing priorities, recognising the commitment to ensure the more vulnerable people of the borough are protected. This demonstrates local needs and recognises the importance of delivering houses for rent in the borough and working within the challenges specific to the borough with particular concerns over affordability. There is a national definition of affordable housing (see Glossary) and the Council will consider different products, such as for intermediate rent or low-cost home ownership, to ensure delivery at a local level is affordable and relevant to the housing needs in the borough. The Council's Tenancy Strategy and Intermediate Housing Policy Statement set out guidance which should inform the provision of a range of affordable housing. Affordable housing should be designed to the same high quality and sustainability standards as private housing (see policy LP 35 in [9.2 'Housing Mix and Standards'](#)).

9.3.4 The Council will expect all developers to ensure that they identify and get the Council's approval of a Registered Provider to support the delivery of affordable housing on site at the time of submission of a planning application and any associated financial appraisal. In this way negotiations on viability will include the resources available to the Registered Provider to be taken into account early in the planning process. It is expected that any viability appraisal will need to demonstrate how affordable housing is being maximised (on all large sites and all former employment sites) with Registered Providers optimising their use of all resources including borrowing and grant as and when it is available and being included in design discussions. Evidence of these discussions with Registered Providers is required to be submitted with an application, as set out in the Local Validation Checklist.

9.3.5 The GLA's Affordable Housing Development Control Toolkit or a similar model should be used in presenting any viability evidence for a scheme involving affordable housing, if it is not in accordance with the Council's policy. Full public disclosure of financial information should be expected to inform transparent decision-making, as set out in the Local Validation Checklist.

9.3.6 Where affordable housing involves dwellings with larger numbers of habitable rooms per dwelling, or different sizes of habitable rooms with different tenures, it may be more appropriate for the calculation of the affordable housing proportion to be in terms of habitable rooms or floor space.

9.3.7 The threshold is expressed in terms of the capability of the site, in order to overcome attempts to evade thresholds. For example, these could be by lowering densities, providing unit sizes significantly above the Nationally Described Space Standards, failing to provide the required mix of units, phasing development, submitting subsequent applications on the same site or adjoining sites, or by incremental acquisition of sites. In these circumstances the Council would apply the affordable housing policy requirements.

9.3.8 The Affordable Housing SPD sets out further details of the methodology for calculating the financial contribution from small sites. The amount is proportionate to the strategic borough-wide target but applies a sliding scale that decreases with a decrease in total number of units proposed (for small site conversions below normal policy requirements and for former employment small sites above normal policy requirements). This has been set out to clearly suggest a reasonable starting point for negotiations. The amount reflects local values and takes account of other development costs. The focus is on achieving financial neutrality in terms of on or off-site provision and contributions will only be spent on affordable housing that would be in addition to affordable housing that would be provided anyway. The principle is to capture the difference which the developer would have put in, had the scheme been entirely for affordable housing, applied to the sliding scale of contributions sought related to the size and type of the scheme.

9.3.9 Policy LP 40 in [10.1 'Employment and Local Economy'](#) seeks to retain employment floorspace and does not wish to encourage the change of use of employment sites to potentially higher value residential uses. In those exceptional circumstances where the Council agrees a change of use, the lower Existing Use Value of employment land means that any residential development involving a loss of employment floorspace is required to increase affordable housing above the normal policy requirements for new build development or redevelopment. As a public benefit this would compensate for the loss of employment where it has already been agreed by the Council that on-site affordable housing is not suitable. The rate for conversion/reversions is adjusted to acknowledge the difference between new-build and conversion/reversion schemes.

9.3.10 Contributions will be secured via a Planning Obligation. Financial contributions made to the ring-fenced Affordable Housing Fund are allocated to the Council's Housing Capital Programme and used to help fund new affordable housing, or to fund acquisition of land and private properties for this purpose, or for enhanced provision through re-modelling existing affordable units or supported schemes, in pursuance of housing and planning objectives. The financial contribution will not be converted into the actual delivery of units on an identified linked site, unless suitable, as it is vital that affordable housing is delivered in the most effective way.

9.3.11 The cost of affordable housing policy requirements should be factored into negotiations on land values. The onus will be on developers to pay for any viability assessment if the proposal is not policy compliant and any cost of independent assessment. The Council will only consider reducing planning obligations if fully justified through a financial appraisal model or evidence, informed by engagement with a Registered Provider. This will be the exception rather than the rule. The Council will expect this contribution in addition to any other requirements under CIL and as set out in the Planning Obligations Strategy SPD. Recent viability testing for the borough CIL took account of affordable housing policy requirements and a whole plan viability assessment for the Local Plan Review accompanies this Plan.

9.3.12 In respect of schemes presently anticipated to deliver low levels of affordable housing below policy requirements, where there is dispute about values and to take account of economic uncertainties, mechanisms will be sought to allow for a future review to take account of the values of the site at key stages in the development and when completed (as appropriate). This could result in a higher affordable housing contribution, first assessing in the form of additional units on-site or an off-site financial contribution where it is demonstrated this is not practicable.

[New para] The Mayor's Affordable Housing and Viability Supplementary Planning Guidance (2017), which provides useful guidance alongside the Local Plan, particularly in respect of viability considerations, will need to be applied for all schemes providing 10 or more homes.

### **Starter Homes**

9.3.13 The Housing and Planning Act 2016 introduced a duty on local planning authorities to promote Starter Homes and proposed changes to the NPPF are likely to include Starter Homes within the definition of affordable housing. In large parts of the borough homes at 80% of the market price are unlikely to be below the indicated threshold of £450,000 (at 80% of market value) applicable to Greater London and therefore undeliverable. Furthermore, Starter Homes at 80% of market price would not be affordable for low income households in the borough. An approach to Starter Homes in London needs to take account of affordability and viability. Further details are awaited from Government. The local evidence from the Richmond Housing Register is that the income and/or deposit needed to access a Starter Home would render it unaffordable for the vast majority of people with an interest in securing low cost home ownership housing. Low cost home ownership options would only be acceptable as part of a mix with rented affordable homes, having regard to local needs and involvement of Registered Providers to secure products in perpetuity.

## **9.4 Housing Needs of Different Groups**

### **Policy LP 37**

#### **Housing Needs of Different Groups**

A. The loss of existing housing will be resisted where it meets identified specific community needs, unless it can be shown that:

- the accommodation is no longer needed, or
- that the existing accommodation will be adequately re-provided to an equivalent or greater standard in a different way or elsewhere, or
- the new accommodation will instead meet another identified priority local need.

B. Planning permission will be granted for new accommodation where housing is providing for an identified local need, across a range of tenures, providing they are on a site and in a location suitable for that particular use, and in accordance with environmental, transport, parking and other relevant policies.

C. The existing Traveller site at Priest Close and Chapter Way previously referred to as Bishops Grove, Hampton will be protected. Sites for temporary or permanent use for Gypsies and Travellers should meet the following criteria:

1. The site can provide for a satisfactory arrangement of pitches, permanent buildings and open space;
2. The use of the site would have no significant adverse effect on the amenity of occupiers of adjoining land;
3. The use of the site would be acceptable in terms of visual amenity and;
4. The use could be supported by adequate social infrastructure in the locality, including access to education and health services.

9.4.1 Different types of accommodation are recognised as important in the borough, particularly to provide affordable options and meet the needs of residents who may otherwise have difficulty finding alternative accommodation. Existing accommodation needs to be protected given the constraints of land supply and new accommodation encouraged recognising affordability issues in the borough. The limited land supply means that new developments must be directed at identified priority local needs.

9.4.2 The range of housing to meet specific community needs can include sheltered housing with care support, staffed hostels, residential care homes/nursing homes, extra-care housing, provision by local

colleges, hotels and other institutions for their students and/or staff. These include supported housing provision for children, older persons and other client groups.

9.4.3 Local need should be identified on the basis of up to date evidence and related to the Council's housing and associated strategies, including specific reviews concerning supported housing for specific client groups, or other relevant strategies.

9.4.4 The Housing Strategy 2013-17 sets out the key role of supported housing. The Council undertook a Supported Accommodation review in 2010 which recognised the need to increase the in-borough provision for those who require supported accommodation across a range of service areas. In alignment with the Valuing People guidance and the Council's own Commissioning Strategy there is an identified need to remodel some existing residential care services and expand the range of supported living options that are available in the borough.

9.4.5 The Older Peoples Supported Accommodation Review (2008) identified: no additional requirements for 'residential care' in the borough; there are adequate premises with nursing care; and adequate affordable social sheltered accommodation.

9.4.6 'Extra Care' housing provides self-contained accommodation with care available on site. The Council's Extra Care Housing Evidence Base (2015) suggests there is an estimated need for at least an additional 81 extra care units in the borough provided across two to three areas in the period 2015 to 2020.

9.4.7 The Council's Retirement Housing Review (2016) recommends that 145 additional units (76 should be sold at market rates, 35 units for intermediate sale and 34 social rented units) are delivered across 3 or 4 schemes in the borough and sets a timeframe of 2020 for the delivery of these units. These figures include remodelling of existing stock. It identifies potential gaps in provision in Kew, Whitton and Heathfield. It states developers of retirement housing should engage with the Council to ensure that they bring forward retirement housing products which are viable and meet local needs in relation to housing and infrastructure.

[new paragraph] The Market Position Statement 2015-16 sets out the current and potential future demand and supply for adult social care services and outlines the investment that the Council and its partners have made in local services, to inform evidence based commissioning.

9.4.8 Further work on the strategic approach to future commissioning and delivery of accommodation options for older people is underway.

9.4.9 Current housing priorities include:

- remodelling of older peoples sheltered accommodation to provide self contained units;
- extra care housing which in some cases can be created from remodelling existing sheltered accommodation;
- private sheltered and extra care accommodation (but this would be a lower priority than affordable housing);
- supporting the PLD valuing people agenda to provide greater choice in supported housing options;
- student accommodation to meet needs of institutions within the borough (but this would be a lower priority than affordable and supported housing priorities).

9.4.10 However as identified in the Borough SHMA the need for affordable homes remains substantial and is therefore a higher priority to those identified above. Where proposed residential provision does not itself meet the NPPF definition of affordable housing, affordable housing policy requirements will be applicable to site proposals for accommodation considered under this policy and it is expected that schemes will be designed to accommodate affordable housing alongside other types of housing for specific groups.

9.4.11 The initial outcome of the Council's research on Gypsies and Travellers in 2013 and 2015 (report published in 2016) suggests that there is no demonstrated need for additional pitches; although there is a need to protect the existing site. There may be opportunities for other innovative solutions to improve

support to address needs such as providing floating support to those in bricks and mortar to address issues of isolation, managing a home and maintaining a tenancy.

9.4.12 The Private Rented Sector (PRS) can assist in meeting a range of needs and be particularly suitable for certain locations. It can for example offer longer term tenancies/more certainty over long term availability and ensure effective management through single ownership. Any PRS schemes are strongly encouraged to sign up to the London Rental Standard. Wholly PRS proposals are unlikely to be supported where they do not contribute to the higher priority need for affordable housing.

9.4.13 Student housing will only be supported where it meets demonstrable local need and does not compromise capacity for conventional homes or undermine policies to secure mixed and balanced communities. It must not prejudice the supply of affordable housing and other priority supported housing. It should be brought forward in conjunction with an existing local institution and demonstrate that the proposed design will meet their needs, including details on affordability. The future strategy for St Mary's University proposes growth to increase the number of students and any residential uses proposed should form part of a wider accommodation strategy taking account of capacity and infrastructure.

9.4.14 Strategies produced by third parties demonstrating local need should have been subject to consultation with appropriate bodies or verification to demonstrate the robustness of the evidence to the Council. The type of accommodation proposed for any site must be kept under regular review and not assumed to have stayed the same, as communities needs can change within a short time period. Evidence will be considered in light of the Council's research and strategic priorities. If there is no evidential need arising within the borough, other priorities should be addressed and the capacity for conventional housing should not be compromised. Limited land means that development to accommodate needs arising from outside the borough will not generally be supported.

9.4.15 Provision is encouraged in accessible locations and integrated within communities.

9.4.16 High quality design standards, relevant to client needs, will be expected, including inclusive design and provision of internal and external space. For example older peoples accommodation should address specific needs such as storage of electric buggies in dry locations, increasing wheelchair housing and turning circles for day centre buses.

### **Custom and Self Build**

9.4.17 The Government wants to enable more people to build or commission their own home and wants to make this form of housing a mainstream housing option. The requirement for the Council to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in their area came into effect in April 2016 and while the Council's Register is live there is not yet comprehensive information on demand. Other sources suggest a level of demand in the borough, and while they could form part of the overall housing mix there is limited land supply, high land values and other priority land uses which may need to be considered in particular to optimise overall housing delivery. Demand will be a consideration in the Council's planning, housing, land disposal and regeneration functions. Further details for setting local eligibility criteria and for local authorities seeking exemption of the duty to grant sufficient development permissions to meet demand for self-building were announced in October 2016.

## 9.5 Loss of Housing

### Policy LP 38

#### Loss of Housing

- A. Existing housing should be retained.
- B. Proposals for reversions and conversions should assess the suitability of the property and design considerations.
- C. Redevelopment of existing housing should normally only take place where:
  - a. it has first been demonstrated that the existing housing is incapable of improvement or conversion to a satisfactory standard to provide an equivalent scheme; and, if this is the case
  - b. the proposal does not have an adverse impact on local character; and
  - c. the proposal provides a reasonable standard of accommodation, including accessible design, as set out in LP 35 Housing Mix and Standards.

9.5.1 Existing housing is valued in the borough due to the constraints of limited land supply and high land values. The housing targets for the Council will be challenging to achieve and any loss of existing units exacerbates this.

9.5.2 The policy is aimed at individual smaller sites, rather than large scale remodelling.

9.5.3 There is a presumption for the applicant to first assess the potential for retaining and refurbishing existing buildings. There should be full consideration as to whether existing housing can be improved or converted to a satisfactory standard. Proposals for redevelopment will be assessed for benefits on the balance of the quality of housing provision particularly in respect of design and amenity considerations and the impact on character and the streetscene, informed by the Council's Village Planning Guidance SPDs.

9.5.4 There is a presumption against the loss of housing units but exceptions may be considered if other policy priorities are met and wider benefits provided such as an increase in employment uses, affordable housing or housing to meet identified community needs, provision of health facilities, or infrastructure.

9.5.5 It is recognised that Registered Providers are subject to complex financial regulations and have to address specific needs. Therefore exceptions to policy will be considered in cases where conversions, reversions or redevelopment will result in affordable units being retained and managed as affordable housing by a Registered Provider or similar body, in furtherance of the Council's Housing and related Strategies.

9.5.6 Reversions of houses converted into flats back into a single family dwelling house may be considered acceptable if the property was originally a single family dwelling house and it can be demonstrated the loss of units will be outweighed by environmental, street scene, transport or parking benefits which could not be easily achieved without the reversion. Evidence of tangible benefits is required from an applicant to justify an exception on this basis. This can include assessments of sustainability or the poor standards of existing units. A stronger justification for an exception needs to be made where there is a greater loss of existing units.

9.5.7 The conversion of larger types of houses to flats can make a contribution to meeting certain housing needs and provides the opportunity to meet the need for small units. However, it must be recognised that only certain types of property are suitable for conversion, and that there are some areas where conversions would be incompatible with the existing character of the area, or lead to unacceptable parking conditions. In considering in principle the suitability of a property for conversion the Council will take into account:

- the size of the property and its physical characteristics, including layout and size of rooms;

- on-street parking conditions and on-street parking restrictions; the adequacy of bus and rail transport;
- the amount of off-street parking which would be appropriate and its location, which must not unduly affect the amenities of adjoining premises or the character of the area;
- the location of the property and the need to protect the established character of existing residential areas, including that of specific roads, as identified in the Council's Village Planning Guidance SPDs;
- the effect on the amenities of adjoining premises;
- the extent to which the property contributes to meeting specific community needs in accordance with policy LP 37 in [9.4 'Housing Needs of Different Groups'](#).

9.5.8 In cases where the Council accepts that in principle a property may be suitable for conversion, the design of the conversion will be required to provide a satisfactory standard of accommodation and contribute positively to its surroundings. If a property is considered suitable for conversion, the Council will take account of the following design considerations in assessing the proposal:

- number of units in relation to size of property and layout in accordance with policy LP 35 in [9.2 'Housing Mix and Standards'](#) and the Residential Development Standards SPD;
- level of daylighting and sunlight and avoidance of overlooking in accordance with policy LP 8 in [4.8 'Amenity and Living Conditions'](#);
- mix of unit sizes, and particularly the need to increase the supply of small low cost units for rent and owner-occupation in accordance with policy LP 35 in [9.2 'Housing Mix and Standards'](#);
- access to private amenity space in accordance with policy LP 35 in [9.2 'Housing Mix and Standards'](#) and the Residential Development Standards SPD.

## 9.6 Infill, Backland and Backgarden Development

### Policy LP 39

#### Infill, Backland and Backgarden Development

##### Infill and Backland Development

A. All infill and backland development must reflect the character of the surrounding area and protect the amenity and living conditions of neighbours. In considering applications for infill and backland development the following factors should be addressed:

1. Retain plots of sufficient width for adequate separation between dwellings;
2. Retain similar spacing between new buildings to any established spacing;
3. Retain appropriate garden space for adjacent dwellings;
4. Respect the local context, in accordance with policy LP 2 Building Heights;
5. Enhance the street frontage (where applicable) taking account of local character;
6. Incorporate or reflect materials and detailing on existing dwellings, in accordance with policy LP 1 Local Character and Design Quality;
7. Retain or re-provide features important to character, appearance or wildlife, in accordance with policy LP 16 Trees and Landscape;
8. Result in no unacceptable adverse impact on neighbours, including loss of privacy to existing homes or gardens, in accordance with policy LP 8 Amenity and Living Conditions;
9. Provide adequate servicing, recycling and refuse storage as well as cycle parking;
10. Result in no unacceptable impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking.

##### Backgarden Development

B. There is a presumption against loss of back gardens due to the need to maintain local character, amenity space and biodiversity. Back garden land which contributes either individually or as part of a larger swathe of green space to amenity of residents or provides wildlife habitats must be retained. In some cases a limited scale of backgarden development may be considered acceptable if it complies with the factors set out in A above. Development on backgarden sites must be more intimate in scale and lower than frontage properties.

9.6.1 Infill development is considered as sites within street frontages including the development of a small gap in an otherwise built up frontage. This policy could apply to a separate unit or units or an extension to an existing unit or outbuildings, and could include side garden plots. Each site will be assessed as to whether it is considered suitable for development. There is now no automatic presumption that this land is suitable for housing development.

9.6.2 It is important that infill development reinforces the character of streets by reflecting the scale, mass, height, form, fenestration and architectural details of its neighbours.

9.6.3 The character of streets has often been weakened by infilling space between dwellings. In considering new infill development the width of the remaining and the new plot should be similar to that prevailing in the immediate area and the established spacing between dwellings, building line and height should be maintained.

9.6.4 Character is also determined by materials and architectural details and these should reflect existing materials and predominant styles, in accordance with policy LP 1 in [4.1 'Local Character and Design Quality'](#),

in the Design Quality Supplementary Planning Document, in various Conservation Area Statements and, where available, studies and the Council's Village Planning Guidance SPDs.

9.6.5 Most backland development in the borough involves loss of garden land. In general the Council will not accept proposals for developments on backgarden land but proposals for development of backland sites in other uses will be considered subject to the criteria above and other relevant policies.

9.6.6 The restrictive approach reflects the direct and indirect value of gardens contributing to local character, providing safe and secure amenity and play space, supporting biodiversity, helping to reduce flood risk and mitigating the effects of climate change including the heat island effect.

9.6.7 Housing delivery from backgarden land is not needed to meet the borough's strategic housing targets. The Council will restrict garden development where gardens make a significant contribution to local character, ecology and/or the general environment. In assessing local ecological value the Council will take into account the length and overall size of the gardens and value of adjacent land as larger areas support a wider range and number of species. Gardens are also important in establishing the character of certain parts of the borough and this is recognised in the Design Quality SPD, in various Conservation Area Statements and, where available, studies and the Council's Village Planning Guidance SPDs. Policy LP 16 in [5.5 'Trees, Woodlands and Landscape'](#) recognises the value of trees in the borough. However, this consideration will need to be made on a case by case basis. These factors mean that developments that involve a significant loss of garden land will normally be unacceptable.

# 10 Employment and Local Economy

## 10.1 Employment and Local Economy

### Policy LP 40

#### Employment and local economy

The Council will support a diverse and strong local economy in line with the following principles:

1. Land in employment use should be retained in employment use for business, industrial or storage purposes.
2. Major new employment development should be directed towards Richmond and Twickenham centres. Other employment floorspace of an appropriate scale may be located elsewhere.
3. The provision of small units, affordable units and flexible workspace such as co-working space is encouraged.
4. In exceptional circumstances, mixed use development proposals which come forward for specific employment sites should retain, and where possible enhance, the level of existing employment floorspace. The inclusion of residential use within mixed use schemes will not be appropriate where it would adversely impact on the continued operation of other established employment uses within that site or on neighbouring sites.

10.1.1 This policy is concerned with uses within the B Use Classes and other sites which are Sui Generis use with a significant employment generating floorspace. Specific policies for offices and industrial land and business parks are set out separately in this Plan.

10.1.2 The borough has a significant local economy, with a high proportion of small businesses serving local residents and other local businesses. It is therefore vital in terms of local economic and environmental sustainability objectives to protect and enhance this provision. However, the Council's updated Employment Land Study indicates that a lack of sufficient employment floorspace provision is a constraint on future employment and business growth in the borough. Therefore there is a presumption against the release of any employment land or stock (office, industrial and storage floorspace) in the borough to other uses. It is imperative that sufficient well-located employment land is retained or redeveloped to meet modern business needs and support a strong sustainable economy.

10.1.3 A sustainable borough is also one that has a large range of local employment opportunities for its residents and where all residents have access to those opportunities and other services without the need to travel far, or which are accessible by sustainable forms of transport. Therefore, it is important that employment land is retained close to residential areas to provide a choice of employment opportunities within the borough now and in the future to help to maintain Richmond upon Thames as a borough where both economic and social wellbeing is high.

10.1.4 The borough is home to nationally important scientific institutions such as The Royal Botanic Gardens, the National Physical Laboratory (NPL) and head office of the Laboratory of the Government Chemist (LGC), as well as academic institutions such as St Mary's University. Scientific, innovation and research, provision of incubator units and laboratories will be supported. Other uses important to the local economy such as education, sports and leisure, arts, culture, entertainment, creative, historic and river related uses that add to the overall economic diversity of the borough will also be supported. Various leisure, cultural and historic sites including Hampton Court Palace and Marble Hill House, the River Thames and its tributaries, and Richmond Park and Bushy Park offer opportunities for economic spin offs as well as contributing to supporting a high quality and unique environment.

## 10.2 Offices

### Policy LP 41

#### Offices

The Council will support a strong local economy and ensure there is a range of office premises within the borough, particularly for small and medium size business activities within the borough's centres, to allow businesses to grow and thrive.

#### Retention of offices

A. There is a presumption against the loss of office floorspace in all parts of the borough.

Any loss of office space (on sites outside the designated Key Office Areas) will only be permitted where:

1. Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an office based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing office use or an alternative office-based use completed over a minimum period of two continuous years in accordance with the approach set out in Appendix 5; and then
2. A sequential approach to redevelopment or change of use is applied as follows:
  - a. Redevelopment for alternative employment uses including social or community infrastructure uses; followed by
  - b. Mixed use including other employment generating or community uses and residential which maximises the amount of affordable housing provided as part of the mix; followed by
  - c. Residential with maximum provision of affordable housing in accordance with policy LP 36 Affordable Housing.

B. Low cost office spaces should be retained to meet the requirements of small businesses, start-ups and the voluntary sector. Utilising premises above shops in the borough's centres for office occupation is encouraged as a source of lower cost office provision.

#### Key Office Areas

C. In the designated Key Office Areas, as shown on the Policies Map, net loss of office floorspace will not be permitted. Any development proposals for new employment or mixed use floorspace should contribute to a net increase in office floorspace where feasible. Criteria 1 and 2 in A (above) do not apply to the Key Office Areas.

#### New offices

D. The Council will support appropriate new office development by the following means:

1. Major new office development should generally be within the five main borough centres.
2. Smaller scale office development will be encouraged in suitable locations, particularly within the designated Key Office Areas.
3. New office accommodation should be suitable to meet future needs, especially to provide for the requirements of local businesses and small firms.
4. Design of office floorspace for flexible occupation and modern methods of working such as co-working space is encouraged.
5. The Council will require the provision of affordable office space within all major developments with over 1000sqm of office space; this will be secured through Planning Obligations.

10.2.1 This policy is concerned with uses within the B1 Use Class. The borough has limited office floor space which is often found on small sites scattered across mixed-use and residential areas. A substantial quantity of office space has been lost in the borough as a result of the introduction of permitted development rights for change of use from B1 office to C3 residential. In order to secure the long term future of office sites in the borough there is a presumption against loss of any office space.

10.2.2 The Council has made two Article 4 Directions to remove permitted development rights in key areas of the borough. These have been used as a basis for the designation of Key Office Areas where net loss of office floorspace will not be permitted.

### **Retention of offices**

10.2.3 Loss of office floorspace has an adverse effect on business, employment and the character of the borough and will therefore be strongly resisted in all parts of the borough. Net loss of office floorspace will not be permitted in designated Key Office Areas.

10.2.4 In development proposals that could result in loss of office floorspace outside of designated Key Office Areas, the applicant must provide robust and compelling evidence which clearly demonstrates that there is no longer demand for an office based use in this location and that there is not likely to be in the foreseeable future. This must include a marketing exercise. Given the length of economic and development cycles, an employment site should be marketed for a minimum of two consecutive years. A site should be marketed either for its existing office use or alternative office uses such as flexible, start-up or co-working space. Prices should be based on the local office market and on the existing quality of the accommodation. Refer to Appendix 5 of this Plan for further details on marketing requirements.

10.2.5 If the Council is satisfied that a full and proper marketing exercise has been undertaken and that there is evidence that there is no demand for continued office-based use on the site, then redevelopment or change of use away from office use may be appropriate, provided that the following sequential approach to redevelopment is applied:

1. The first step in the sequential test is consideration of alternative employment generating uses. These uses should include in the first instance B Use Classes and if these are not practicable then social infrastructure or community uses such as health clinics, nurseries, crèches, leisure facilities or other uses identified for community purposes.
2. The second step in the sequential test is for mixed use development including other employment generating or community uses. Proposals for mixed use schemes should maintain or improve the amount of employment floorspace on site. Such sites should maximise the amount of affordable housing provided as part of the mix (if residential is proposed).
3. If the Council deems that the retention of the site for employment use is not practicable and proposals for alternative employment generating or community uses are also not appropriate following marketing, then exceptionally the Council may permit residential development with maximum provision of affordable housing. High residential land values across the borough mean that employment land at Existing Use Value may present a source of affordable land that would be financially viable for affordable housing provision.

10.2.6 The types of office buildings most at risk from conversion have relatively small floorplates. In order to maximise the choice of lower cost office stock to provide cheaper accommodation to the borough's high percentage of Small and Medium Enterprises (SMEs), the Council seeks to discourage the unnecessary redevelopment of these premises. This will not only allow firms to remain and expand within the borough but also help to ensure that a variety and choice of employment opportunities and services are maintained. In addition, use of premises above shops in centres for office occupation is encouraged as a source of lower cost office provision.

## **Key Office Areas**

10.2.7 The Key Office Areas have been designated because of their particular importance for office employment space. These areas align with the areas subject to Article 4 Directions where permitted development rights for change of use from office to residential have been removed. In addition, London House (243-253 Lower Mortlake Road, Richmond) has been identified as a Key Office Area subsequent to the making of the Article 4 Directions. Maps of the Article 4 Direction areas can be viewed on the Council's website.

10.2.8 In the Key Office Areas there is a presumption that the quantum of existing office floorspace will be retained or enhanced. The Council will not permit loss of office space in these areas and development of new office space is encouraged. Proposals for redevelopment of employment sites or mixed use schemes will be required to contribute to a net increase in office floorspace. Specific details would be discussed on a case by case basis.

10.2.9 Designated Key Office Areas are shown on the Policies Map, and listed below:

Hampton:

- Thames Street, Hampton
- Kingsway Business Park, Hampton
- Castle Business Village, Station Road and Mount Mews, High Street, Hampton

Hampton Wick:

- High Street and Lower Teddington Road, Hampton Wick

Hampton Hill:

- Hampton Hill Business Park, Hampton Hill
- Northern part of High Street, Hampton Hill

Teddington:

- Teddington centre and Waldegrave Road
- National Physical Laboratory, Teddington
- 127-133 High Street, and 1 & 2A Cambridge Road, Teddington
- 180 High Street, Teddington
- 43-67 Broad Street, Teddington
- 90-120 Church Road, Teddington
- 38-42 Hampton Road, Teddington

Twickenham:

- Twickenham centre (part)
- Bridge House, Twickenham
- Hampton Road, Twickenham
- 5-11 Briar Road, Twickenham
- West Twickenham, south of River Crane
- St George's Industrial Estate, Twickenham

East Twickenham and St Margarets:

- 417-435 Richmond Road, East Twickenham

- St George's House, 76 Crown Road, St Margarets
- Old Lodge Place, St Margarets

Richmond:

- Richmond centre
- Petersham Road, Richmond
- Brook House and Sandal House, Richmond
- Sheen Road, Richmond
- 72-84 Lower Mortlake Road, Richmond
- Falstaff House and St George's House, Bardolph Road, Richmond
- London House, 243-253 Lower Mortlake Road, Richmond

Kew:

- The National Archives, Ruskin Avenue, Kew
- Blake Mews, Station Avenue, Kew

East Sheen and Mortlake:

- Sheen Lane (part), Upper Richmond Road West (part), East Sheen
- Mortlake High Street, Mortlake
- Tideway Yard and The Old Power Station, Mortlake

Barnes:

- Prospect Studios, Barnes High Street, Barnes
- 42-46 Glenthams Road, Barnes

## **New offices**

10.2.10 A shortage of office space across the borough leads to increases in rental values and costs for local businesses. Therefore, the Council encourages new office development in appropriate locations to meet local needs.

10.2.11 The borough's economy is characterised by many small businesses working out of relatively small-scale premises (250sqm or less) and there is an increasing proportion of business start-ups and growing numbers of people running part-time or full-time businesses from home. In support of this, the Council seeks provision of small units to accommodate a variety of local businesses and small firms and to provide the opportunity for residents to set up their own enterprise, enabling them to work closer to home.

10.2.12 Provision of affordable workspace is necessary to support small and new businesses including those operating on a not-for-profit basis. The council will require the provision of affordable office space within major developments, where over 1,000sqm of office floorspace is proposed. Affordable floorspace should constitute at least 10% of the proposed office floor space and the workspace must remain affordable for a minimum of 10 years. Affordable workspace is considered to have a rent and service charge of less than 80% of comparable local market rates. It is acknowledged that market rates will vary according to a range of factors such as location within the borough, the quality and type of office stock. Affordable office provision will be agreed and secured through Planning Obligations in line with the Council's Planning Obligations SPD. A revised Planning Obligations SPD will contain guidance to assist in the implementation of policy requirements on affordable employment space, including guidance on design and financial arrangements.

10.2.13 The Council supports new ways of working such as home working, serviced office accommodation, flexible and co-working space. B1 office space, which is compatible with residential areas, should be flexible

enough to be used for research, studio, light industrial and office purposes and adaptable enough to meet future needs including for the expansion of local firms. Typical features of flexible office space include:

- clear and flexible floor plate space with few supporting columns;
- large amounts of natural light (windowless and basement offices should be avoided);
- availability of a range of unit sizes ranging from 50sqm up to 1,000sqm;
- realistic rents;
- flexible leasing arrangements taking account of the Code for Leasing and Business Premises in England and Wales 2007; and
- building management - applicants are encouraged to come forward with development partners for the management of flexible employment floorspace prior to submitting an application

10.2.14 Live-work units are encouraged on suitable sites but they are not normally appropriate on existing employment land where there is an expectation that dedicated workspace is required.

## 10.3 Industrial Land and Business Parks

### Policy LP 42

#### Industrial Land and Business Parks

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

#### Retention of industrial space

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

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

1. Robust and compelling evidence is provided which clearly demonstrates that there is no longer demand for an industrial based use in this location and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing use or an alternative industrial use completed over a minimum period of two continuous years in accordance with the approach set out in Appendix 5; and then
2. A sequential approach to redevelopment or change of use is applied as follows:
  - a. Redevelopment for office or alternative employment uses.
  - b. Mixed use including other employment generating or community uses, and residential providing it does not adversely impact on the other uses and maximises the amount of affordable housing delivered as part of the mix.

#### Locally important industrial land and business parks

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

- a. loss of industrial floorspace will be resisted unless appropriate replacement floorspace is provided;
- b. development of new industrial floorspace and improvement and expansion of existing premises is encouraged; and
- c. proposals for non-industrial uses will be resisted where the introduction of such uses would impact unacceptably on industrial activities (which may include waste sites).

#### New industrial space

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

10.3.1 The term 'industrial land' referred to throughout this policy covers land used for general industry, light industry, warehouses, open storage, self storage, distribution and logistics and other similar types of employment, as well as any other uses which fall within the B1c, B2 or B8 Use Classes or are considered to be Sui Generis. Land which does not fall within these use classes but is considered to contribute to the reservoir of industrial land in the borough, for example uses which support, contribute to, or could be drawn upon to meet the demand for industrial land, will also be protected in line with the policy.

10.3.2 The Mayor of London's Land for Industry and Transport SPG (2012) states that the Council should ensure a 'restrictive' approach towards the transfer of industrial land to other uses until 2031, which means that industrial land should not be released for other uses. Further to this, the GLA's Industrial Land Supply and Economy Study (2015) demonstrates that the borough has a very limited supply of industrial land, with only 17.3 hectares of general and light industrial space (B2 and B1(c)), and 8.1 hectares of warehousing and storage (B8) facilities; this is amongst the lowest of all the London boroughs. It is expected that the 'restrictive transfer' approach will be retained within the next London Plan. Therefore there is a presumption against loss of any industrial or other such employment space in all parts of the borough, and any loss will be particularly strongly resisted in the listed important industrial land and business parks.

### **Retention of industrial space**

10.3.3 There is a presumption against loss of industrial land in all parts of the borough as this space provides valuable employment opportunities and can encourage creativity and entrepreneurialism. Local service trades such as builders or car repair garages provide useful services to residents and other businesses in the borough as well as a source of local employment opportunities. Small firms such as these and start-up businesses require cheaper accommodation and small incubator units but often find it difficult to acquire suitable affordable premises as the higher value of land for other uses creates pressure for redevelopment for higher quality and priced accommodation. It is therefore important to retain a diverse range of different types and sizes of industrial spaces across the borough.

10.3.4 Any loss of industrial space will only be permitted if the applicant can demonstrate that there is no demand for such space and that there is not likely to be in the foreseeable future. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for the existing use or an alternative industrial or other such employment use completed over a minimum period of two continuous years. Appendix 5 of this Plan provides further details on marketing requirements.

10.3.5 If the Council is satisfied that a full and proper marketing exercise has been undertaken and that there is no demand for continued industrial use on the site then redevelopment or change of use away from industrial use may be appropriate provided the following sequential approach to redevelopment is adhered to:

- The first step in the sequential test is consideration of alternative employment generating uses. These uses should include in the first instance B Use Classes such as offices and if these are not practicable then social infrastructure and community uses such as health clinics, nurseries and crèches, leisure facilities or other uses identified for community purposes.
- The second step in the sequential test is for mixed use development including other employment generating or community uses. Proposals for mixed use schemes should maintain or improve the amount of employment floorspace on site.

[new para] In the borough context it is common for employment, particularly industrial sites to be within established mixed use or residential areas, because of historic development patterns. This does not provide justification for a change of use, as mitigation can address impacts and constraints such as narrow access, which have been managed by existing occupiers, and therefore do not prevent any future or continued employment use.

### **Locally important industrial land and business parks**

10.3.6 The locally important industrial land and business parks, listed below, are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities:

- Kempton Gate Business Park, Oldfield Road, Hampton
- Kingsway Business Park, Oldfield Road, Hampton
- St Clare Business Park, Holly Road, Hampton
- 74 Oldfield Road, Hampton

- 50-56 Waldegrave Road, Teddington
- National Physical Laboratory and LGC Ltd, Hampton Road, Teddington
- Teddington Business Park, Station Road, Teddington
- West Twickenham cluster (including Gregg's Bakery and surroundings), Twickenham
- Heathlands Industrial Estate, Twickenham
- St George's Industrial Estate, The Green, Twickenham
- Mereway Road Industrial Estate, Twickenham
- Swan Island Industrial Estate, Strawberry Vale, Twickenham
- Electroline House and surrounds, Twickenham
- St Margarets Business Centre, Winchester Road, St Margarets
- Twickenham Film Studios, St Margarets
- Market Road, Richmond
- Sandycombe Centre, Sandycombe Road, Kew
- Marlborough Trading Estate, Mortlake Road, Kew
- Mill Farm Business Park, Whitton
- Big Yellow Self Storage, Lower Mortlake Road, Richmond
- Big Yellow Self Storage, Lower Richmond Road, Richmond
- Currie Easy Self Storage, Market Road, Richmond

10.3.7 Maps of the above areas can be found in Appendix 6 of this Plan.

10.3.8 In the locally important industrial land and business parks loss of industrial space will be strongly resisted unless appropriate replacement provision is provided. Appropriateness will be determined with particular regard to site circumstances and the industrial/employment needs of the Borough; it should not be interpreted as a like for like replacement in the nature of the use or its scale. New appropriate industrial, storage and distribution development, as well as improvement and expansion of such premises, is encouraged in these areas, particularly new B2, B8 and B1(c) floorspace. Proposals for non-industrial uses will be resisted unless the proposed uses are ancillary to the principal industrial use on the site.

### **New Industrial space**

10.3.9 The Council encourages and supports new industrial uses and business parks in appropriate locations that meet local needs. New industrial space should be flexible, modern and adaptable for different users. When considering proposals for rebuilding or expansion of existing industrial and storage premises, the Council will encourage improvements to the physical environment within and adjacent to industrial areas.

## 10.4 Visitor Economy

### Policy LP 43

#### Visitor Economy

A. The Council will support the sustainable growth of the visitor economy for the benefit of the local area by:

1. supporting proposals which promote and enhance the borough's existing tourist attractions, including the unique, historic and cultural assets that are connected via the River Thames, such as The Royal Botanic Gardens, Kew, Ham House and Hampton Court Palace;
2. proposals that lead to increased visitors and tourists need to be of an appropriate scale for the size of the centre and will be assessed against the transport policies of this Plan;
3. requiring accommodation and facilities to be accessible to all; at least 10% of hotel bedrooms should be wheelchair accessible;
4. enhancing the environment in areas leading to, within and around visitor destinations where appropriate.

B. In relation to visitor accommodation:

1. proposals which result in the loss of bedspaces will be resisted;
2. proposals which increase the number of bedspaces will be supported subject to other Local Plan policies;
3. proposals will be supported which contribute towards providing a range of visitor accommodation, including small independent hotels and bed and breakfast accommodation, subject to other Local Plan policies.

10.4.1 The Council recognises the value of the visitor economy both to the local and London economy. The borough is a popular destination for visitors to traditional attractions such as the historic houses and gardens, the River Thames as well as the rugby-related attractions and associated facilities such as restaurants and shops. Much of the borough is designated as a Strategic Cultural Area in the London Plan. The Council will expect the major attractions including Twickenham Stadium and the Stoop (Harlequins) to be developed in accordance with the Site Allocations set out in this plan.

10.4.2 The Council will encourage the provision of accommodation to enable visitors to stay longer and spend more. Major new hotel development will be expected to be located within main centre boundaries in the first instance as in policy LP 25 in 7.1 'Development in Centres', which also sets out guidance on the appropriate location and scale of hotel development. The London Plan includes a target of 40,000 net additional hotel bedrooms by 2036. The 2012 Hotel Study by Roger Tym PBA, which will be kept under review, estimates a potential requirement of approximately 900 new bedrooms in the borough by 2026. The London Tourism Action Plan 2009-2013 identifies a potential additional room requirement for the borough of 300 serviced rooms (hotels, B&Bs and hostels), and a further 100 rooms of non-serviced accommodation (which include serviced apartments because they do not provide the same level of service as a hotel) by 2036. Therefore, proposals which increase the number of bedspaces will be supported, subject to other Local Plan policies, where they contribute to meeting the London Plan target, which has been met in part.

10.4.3 In determining applications for hotel development the Council will be mindful of the impact of the development on amenity, living conditions, parking, servicing and transport. It will be taken into account whether any ancillary facilities within the hotel, such as a gym, are open for public use.

10.4.4 The Council will work with its partners to promote the borough as a tourist destination. It is also recognised that major events held within the borough attract very large numbers of people, and the Council

will continue to work with partners, including public transport operators and event organisers, to promote sustainable travel choices and minimise disruption to residents and local businesses where possible.

# 11 Transport

## 11.1 Sustainable Travel Choices

### Policy LP 44

#### Sustainable Travel Choices

The Council will work in partnership to promote safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities including for health benefits and providing access to services, facilities and employment. The Council will:

##### A. Location of development

Encourage high trip generating development to be located in areas with good public transport with sufficient capacity, or which are capable of supporting improvements to provide good public transport accessibility and capacity, taking account of local character and context.

##### B. Walking and cycling

Ensure that new development is designed to maximise permeability within and to the immediate vicinity of the development site through the provision of safe and convenient walking and cycling routes, and to provide opportunities for walking and cycling, including through the provision of links and enhancements to existing networks.

##### C. Public transport

Ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services. Proposals will be expected to support improvements to existing services and infrastructure where no capacity currently exists or is planned to be provided.

Protect existing public transport interchange facilities unless suitable alternative facilities can be provided which ensure the maintenance of the existing public transport operations. Applications will need to include details setting out how such re-provision will be secured and provided in a timely manner.

##### D. The road network

Ensure that new development does not have a severe impact on the operation, safety or accessibility to the local or strategic highway networks. Any impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development, including in relation to on-street parking, should be mitigated through the provision of, or contributions towards, necessary and relevant transport improvements.

In assessing planning applications the cumulative impacts of development on the transport network will be taken into account. Planning applications will need to be supported by the provision of a Transport Assessment if it is a major development, and a Transport Statement if it is a minor development.

##### E. River transport

Encourage the use of the River Thames for passenger and freight transport through the protection of, improvement to, and provision of new relevant infrastructure including wharves, slipways and piers.

##### F. Safeguarding of routes and facilities

Land required for proposed transport schemes as identified in the London Plan and the Council's Local Implementation Plan for Transport will be protected from developments which would prevent their proper implementation.

Local filling stations and supporting services such as car repair facilities will be protected from redevelopment for alternative uses unless exceptional circumstances can be demonstrated that warrant their loss.

## **G. Taxis and private hire vehicles**

Ensure that taxis and private hire vehicles are adequately catered for in appropriate locations.

The Council's aim is to minimise the impacts of development, including in relation to congestion and air pollution. Transport has a significant impact on air quality in the borough, with many areas experiencing levels of pollution above national set target levels. Consequently the entire borough is designated an Air Quality Management Area. This policy, together with the policy on Parking Standards and Servicing, support the achievement of the Air Quality Management Objectives.

### **Location of development**

11.1.1 The usual measure of accessibility is the Public Transport Accessibility Level (PTAL), which takes account of the accessibility of a location to public transport, in six broad bands, with level 6 being the most accessible. Whilst in general higher PTALs are achieved in areas with good rail/tube connections, in this borough it is recognised that bus links also contribute to levels of accessibility. Future improvements to accessibility will also be relevant. These include planned changes by Transport for London (TfL), the Council, rail or bus companies or improvements which could be either provided as part of a new development or funded by developer contributions. To be taken into account there will need to be certainty that future improvements will be implemented in time to serve the development and would be sustainable in the longer-term.

11.1.2 High trip generating development includes larger offices, shopping and leisure facilities as well as mixed use and higher density residential schemes, where a large number of trips are generated each day. As a starting point, areas with a PTAL score of 5 or higher are considered to be appropriate locations for high trip generating development.

11.1.3 The Council will use a site's current PTAL as a starting point, but also consider the highway capacity, the proximity of cycle and walking routes as well as future improvements when evaluating development proposals.

### **Walking, cycling and public transport**

11.1.4 Developments should encourage the use of modes other than the car by making it as easy as possible through provision of good pedestrian facilities, clear layout and signage, provision of cycling facilities and improving access to public transport interchanges. Civic spaces and public realm should be accessible and inclusive. A good walking environment has been shown to be not only beneficial to an individual's health and social life, but also to bring economic benefits to the borough's centres.

11.1.5 Cycling and walking contributes significantly towards creating an attractive and pleasant environment. New development should include all the facilities needed to encourage a safe walking and cycling environment from first occupation. The minimum cycle parking standards are set out in policy LP 45 in [11.2 'Parking Standards and Servicing'](#).

11.1.6 Developments should be integrated into the surrounding community and existing local routes, and provide for improvements to accessibility for all. There are many footpaths, Public Rights of Way and cycle routes in the borough that new development should not compromise, and opportunities to improve them should be taken wherever possible. For this reason, in line with policy LP 1 in [4.1 'Local Character and Design Quality'](#), gated developments will not be permitted.

11.1.7 The Council promotes the creation of a safe network for pedestrians and cyclists. Management of other users including speed restrictions, sufficient widths, segregation where appropriate and well designed and positioned crossing facilities can reduce conflict between users. Well designed paths, natural surveillance, appropriate levels of lighting and other security measures and good levels of maintenance can improve actual and perceived security. The Council's Public Space Design Guide includes advice with respect to the amenity of the pedestrian environment. The London Cycle Design Standards sets out requirements and advice for cycle network planning and for the design of dedicated cycle infrastructure, cycle-friendly streets and cycle parking.

11.1.8 The Council will ensure that there is signage and way marking of the three strategic walking routes identified in the London Plan, which run through the borough – the Thames Path National Trail, the Capital

Ring and the London Loop, and other promoted route, such as the River Crane Walk and Beverley Brook Walk, which together form a network of leisure routes which most residents can reach.

11.1.9 Proposals that improve transport links within or between the borough and other areas will be encouraged. This could refer to physical proposals and improvements such as a new bridge or path; improving existing links such as creating a new gate into a park; or increasing the use of an existing link such as the promotion of a route as a travel option.

#### **The road network**

11.1.10 All planning applications for major developments must be accompanied by a Transport Assessment, or for minor developments a Transport Statement. This may include Travel Plans, Delivery and Servicing Plans and Construction and Logistic Plans. Matters to be included are set out in the London Plan, the latest Department for Transport as well as Transport for London guidance, the Council's Local Validation Checklist and will also be included in a forthcoming SPD on Sustainable Transport Choices, which is being developed by the Council.

11.1.11 Developments will be expected to continue travel planning after occupation to maximise travel by sustainable transport, including personalised travel planning. Existing schools and large employers will also be encouraged to produce travel plans for their sites to help encourage sustainable travel.

#### **River transport**

11.1.12 The Council encourages the use of the River Thames for passenger and freight transport through the protection of, and improvement to, the relevant infrastructure including wharves and slipways. By reducing demand for other forms of surface transport, particularly on roads, the benefits of water transport link through to other key aspects of this Plan, such as reducing traffic and congestion, improving the local environment and quality of life. Together with other policies in this Plan, including LP 12 in 5.1 'Green Infrastructure', LP 18 in 5.7 'River Corridors' as well as LP 19 in 5.8 'Moorings and Floating Structures', this policy supports the multi-functional use of the Blue Ribbon Network.

#### **Safeguarding of routes and facilities**

11.1.13 To discourage vehicles having to make longer trips in order to reach refuelling stations, the Council is seeking to protect existing facilities. Any new facilities should be located on strategic or distributor road networks to minimise disruption and to protect residential amenity. The provision of refuelling facilities for alternative types of fuel e.g. electric or hydrogen will also be encouraged.

11.1.14 The need for improved quality and connectivity of transport interchanges to improve movement in Outer London was identified in both the London Plan and by the Outer London Commission. In the local context 'transport interchanges' refers to anywhere where more than one type of transport mode meets, from train and bus stations to bus stops. The Council will be examining main transport interchanges in consultation with the operating companies and proposing improvements to be taken forward in the Council's Local Implementation Plan for Transport and where appropriate in the site allocations of the Local Plan, and/or in planning briefs.

11.1.15 Delivery of transport infrastructure, including the relevant proposed transport schemes as set out in the London Plan, is critical to the delivery of the strategic objectives of the Local Plan. Planning, through the use of developers' contributions such as through the use of planning obligations (including Section 106 and Community Infrastructure Levy) is a key way that the Council can gain the necessary resources to assist in the delivery of this vital infrastructure.

#### **Taxis and private hire vehicles**

11.1.16 Taxi ranks should be conveniently located close to the venue they serve and accessible for all with adequate space for customers to queue. Taxi ranks should be well-lit and with good CCTV facilities. Ranks must not adversely impact on pedestrian movement or road safety. The Council will consider applications for offices for private hire vehicles against relevant policies of the plan, and subject to them not having an adverse impact on other types of transport including walking and cycling, on-street parking and highway

safety or causing disturbance to residents. The Transport for London's Ranks Action Plan (2015) should be referred to when planning for taxi provision.

## 11.2 Parking Standards and Servicing

### Policy LP 45

#### Parking Standards and Servicing

##### Parking standards

The Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment, and ensuring making the best use of land. It will achieve this by:

1. Requiring new development to provide for car, cycle, 2 wheel and, where applicable, lorry parking and electric vehicle charging points, in accordance with the standards set out in Appendix 3. Opportunities to minimise car parking through its shared use will be encouraged.
2. Resisting the provision of front garden car parking unless it can be demonstrated that:
  - a. there would be no material impact on road or pedestrian safety;
  - b. there would be no harmful impact on the character of the area, including the streetscape or setting of the property, in line with the policies on Local Character and Design; and
  - c. the existing on-street demand is less than available capacity.
3. Car free housing developments may be appropriate in locations with high public transport accessibility, such as areas with a PTAL of 5 or 6, subject to:
  - a. the provision of disabled parking;
  - b. appropriate servicing arrangements; and
  - c. demonstrating that proper controls can be put in place to ensure that the proposal will not contribute to on-street parking stress in the locality.

All proposals for car free housing will need to be supported by the submission of a Travel Plan.

4. Managing the level of publicly available car parking to support the vitality and viability of town and local centres within the borough whilst limiting its impacts on the road network.

##### Freight and Servicing

New major development which involves freight movements and has servicing needs will be required to demonstrate through the submission of a Delivery and Servicing Plan and Construction and Logistics Plan that it creates no severe impacts on the efficient and safe operation of the road network and no material harm to the living conditions of nearby residents.

11.2.1 The borough has high levels of car ownership and use within fairly densely developed residential areas with some narrow streets and many older houses without off-street parking. This has led to high levels of on-street parking, worsened in areas where there is a demand for commuter parking. The standards set are maximum parking levels and car parking provision should not be at a level less than these standards, unless an exceptional circumstance is demonstrated. The approach aims to ensure that sufficient on-site car parking is provided to meet the needs of the occupiers of the new development, but also to ensure that excessive on-street parking demand is not created which could have an adverse impact on local highway/traffic conditions, street scene and impacts on making the best use of land.

11.2.2 This policy covers the parking standards for new developments of all types. Parking must be sensitively located and designed and suitably landscaped to minimise visual intrusion and disturbance. To maintain sufficient parking space within new developments, the parking provision will be expected to be legally tied to the development that it serves. In areas controlled by a Community Parking Zone, occupiers of new residential developments may not be eligible for resident or visitor on-street parking permits where existing levels of on-street parking are very high. This restriction would be secured by excluding the address from the schedule of streets in the relevant road traffic order that created or creates the Controlled Parking Zone in which the property is situated, by restricting under section 106 of the Town and Country Planning Act 1990 the disposal of an interest in relevant properties unless a person disposing advises the person acquiring of the non-availability of residents or business on-street parking permits and/or through Section 16 of the Greater London Council (General Powers) Act 1974 (or any statute revoking or re-enacting that Act).

11.2.3 Developers may only provide fewer parking spaces, including car free schemes, if they can demonstrate as part of a Transport Statement or Transport Assessment with supporting survey information and technical assessment that there would be no unacceptable adverse impact on on-street parking availability, amenity, street scene, road safety or emergency access in the surrounding area, as a result of the generation of unacceptable overspill of on-street parking in the vicinity. In general it is expected that in PTAL areas of 0-3 the standards should be met. In PTAL areas of 4-6, parking provision at a level lower than the standard may be appropriate where this can be demonstrated as acceptable, taking account of local characteristics, availability of sustainable modes of travel and public transport provision, and availability of on-street parking spaces.

11.2.4 Within the main centres, further expansion of car parking (particularly within Richmond and Twickenham) will be limited and other policies will be used to help maintain viability and vitality of the centres. In East Sheen and Whitton, where public parking is relatively limited, the loss of off street parking will be resisted, especially in relation to large supermarkets and pub or hotel developments.

11.2.5 Car share facilities and car clubs will be encouraged, but these may not obviate the need for adequate off street parking provision. Charging facilities for electric vehicles will have to be provided in line with the standards set out in the London Plan, which requires 20% active provision (i.e. fully installed from the outset) plus 20% passive provision (i.e. cabling provided for easier future installation of charging equipment) in residential developments, and 10% active provision plus 10% passive provision in all other developments.

11.2.6 The majority of the borough's businesses and other organisations require regular servicing and deliveries to their site(s). However, it must be recognised that whilst these vehicles provide a vital service, they can also be a cause of congestion, safety and environmental concerns if not properly managed through a variety of mechanisms. Such premises often neighbour residential properties and a balance needs to be achieved between enabling businesses to receive the goods and services they need and protecting residential amenity. A range of techniques and facilities can be used as tools in minimising any negative impacts from freight and servicing.

11.2.7 Delivery and Servicing Plans and Construction and Logistics Plans will be required for all major developments. Details regarding the requirements for these plans will be set out in a forthcoming Sustainable Transport Choices SPD.

11.2.8 The Council's SPD on Parking in Front Gardens discourages the parking of vehicles in existing front gardens. Further guidance is also contained policy LP 1 in [4.1 'Local Character and Design Quality'](#) and in the Village Planning Guidance SPDs.

## 12 Site Allocations

### 12.1 Site Allocations

12.1.1 The Council has identified key sites that are considered to assist with the delivery of the Spatial Strategy of this Plan. This is of particular importance for ensuring there is sufficient land for employment, retail, housing and social infrastructure.

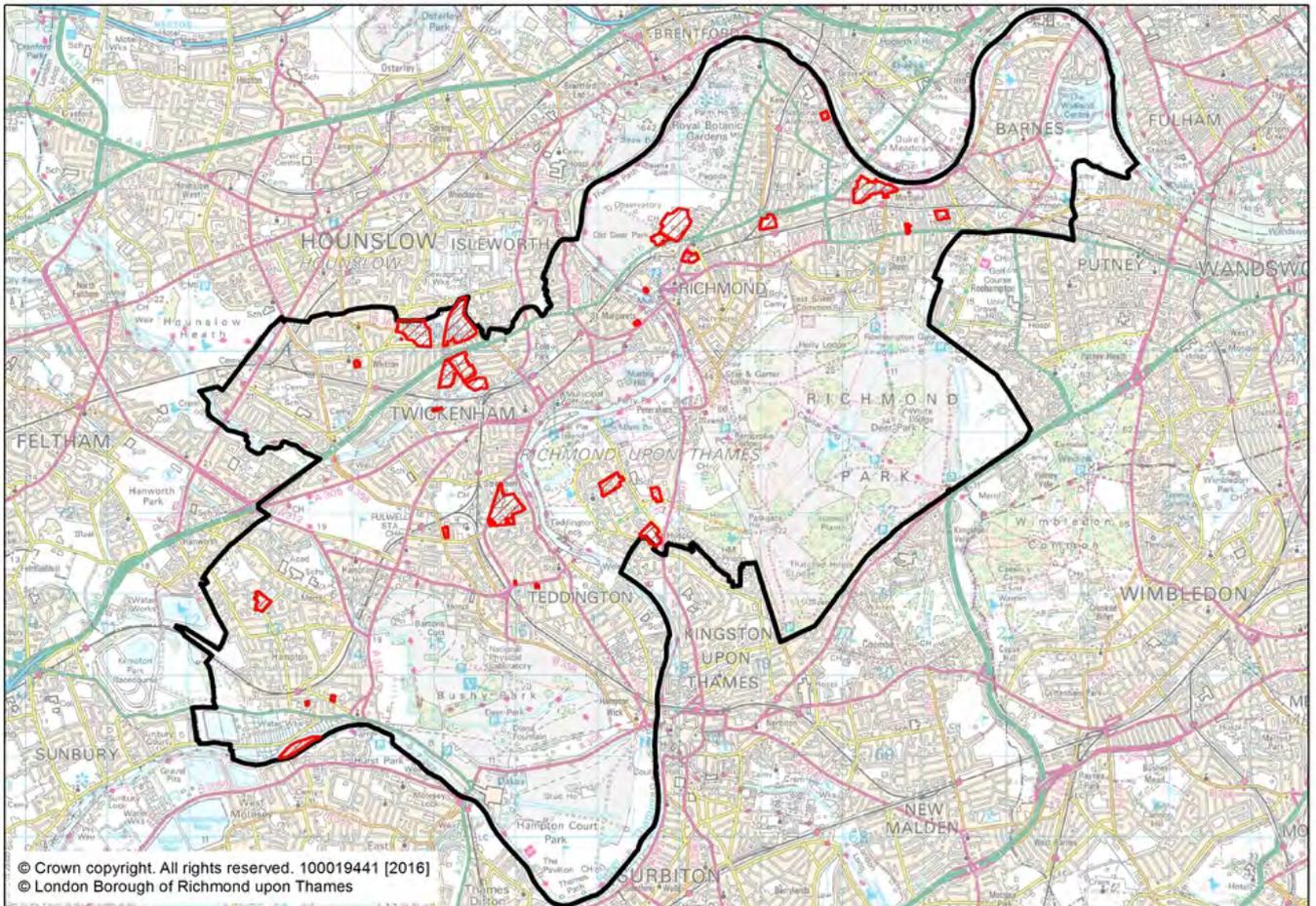
12.1.2 In order to support the borough's demand and need for employment taking into account job and growth forecasts, the site allocations should be considered alongside the designation for the 'Key Office Areas' (in line with policy LP 41 in [10.2 'Offices'](#) of this Plan), which have been designated because of their particular importance for providing space for businesses and firms that support local employment. In addition, the Council has identified locally important industrial land and business parks, as set out in policy LP 42 in [10.3 'Industrial Land and Business Parks'](#) of this Plan, which are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities.

12.1.3 Not all present and future needs will be met by allocating new sites; needs will also be met through:

- better and more efficient use of existing premises and sites;
- new development opportunities emerging throughout this Plan's period; and
- development opportunities at smaller sites that have not been included in the Plan and where planning applications can be considered in the light of other policies in this Plan.

#### **Overview and summary of allocated sites**

12.1.4 The following provides a borough-wide overview and list of all sites that have been identified for development as part of the Local Plan.



- SA 1 Hampton Square, Hampton
- SA 2 Platts Eyot, Hampton
- SA 3 Hampton Traffic Unit, 60-68 Station Road, Hampton
- SA 4 Hampton Delivery Office, Rosehill, Hampton
- SA 5 Telephone Exchange, Teddington
- SA 6 Teddington Delivery Office, Teddington
- SA 7 Strathmore Centre, Strathmore Road, Teddington
- SA 8 St Mary's University, Strawberry Hill
- SA 9 Richmond upon Thames College, Twickenham
- SA 10 The Stoop (Harlequins Rugby Football Club), Twickenham
- SA 11 Twickenham Stadium, Twickenham
- SA 12 Mereway Day Centre, Mereway Road, Twickenham
- SA 13 Telephone Exchange, Whitton
- SA 14 Kneller Hall, Whitton
- SA 15 Ham Close, Ham
- SA 16 Cassel Hospital, Ham Common, Ham
- SA 17 St Michael's Convent, Ham Common, including new OOLTI designation
- SA 18 Ryde House, East Twickenham
- SA 19 Richmond Station, Richmond
- SA 20 Friars Lane Car Park, Richmond
- SA 21 Sainsbury's, Lower Richmond Road, Richmond
- SA 22 Pools on the Park and surroundings, Old Deer Park, Richmond
- SA 23 Richmond Athletic Association Ground, Old Deer Park, Richmond
- SA 24 Stag Brewery, Lower Richmond Road, Mortlake
- SA 25 Mortlake and Barnes Delivery Office, Mortlake
- SA 26 Kew Biothane Plant, Mellis Avenue, Kew

- SA 27 Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen
- SA 28 Barnes Hospital, East Sheen

12.1.5 The following section provides details for the borough's key site allocations. Each proposal site is supported by a site map with a red line depicting the boundary as well as a description of key features, land uses and where relevant the link to the local evidence and need.

12.1.6 Policies within this Plan and any other relevant adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of this Plan.

12.1.7 The Council adopted the Area Action Plan (AAP) for Twickenham centre in 2013, which sets out detailed policies and site-specific proposals for Twickenham centre. The AAP including its site-specific proposals remain as existing and they are not superseded once the Local Plan has been adopted.

## SA 1 Hampton Square, Hampton

Partial redevelopment and improvement for community, retail and local services, employment and residential uses, including affordable units and car parking.

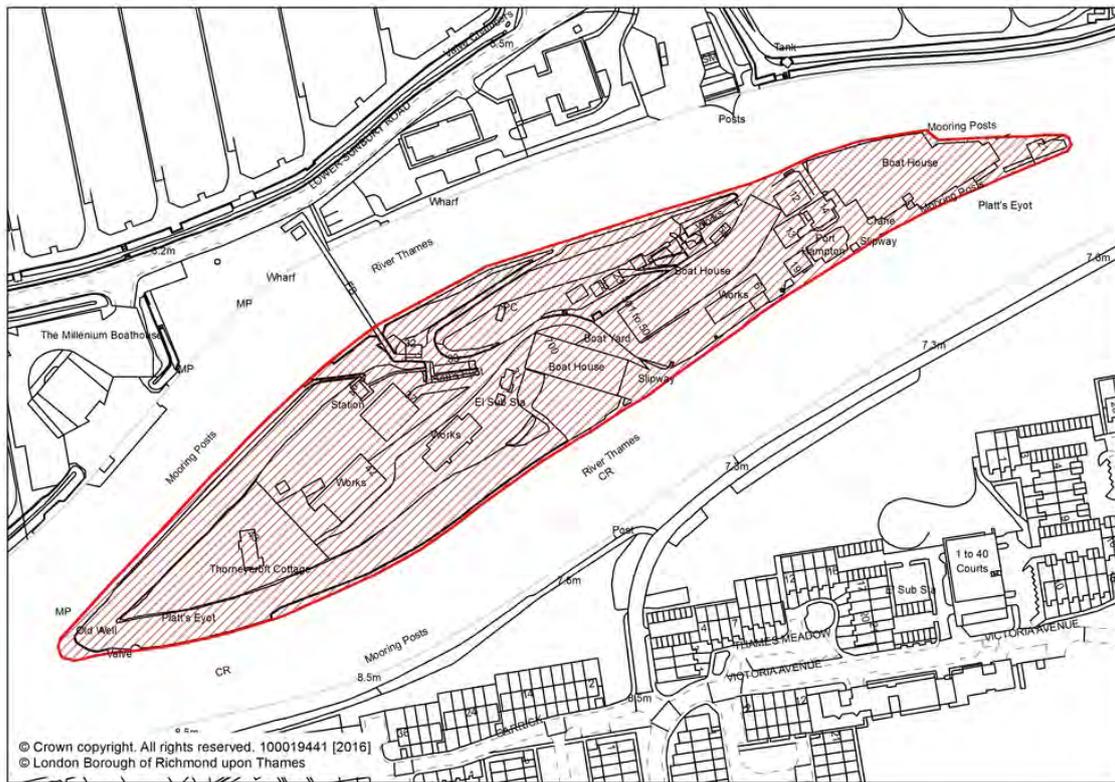
- The Council has already rejuvenated Hampton Square through an £800,000 investment project. The Square now provides a modern and welcoming focal point for Hampton North, including an impressive illuminated water feature, seating, landscaping and space for a whole range of community activities.
- There is still a need for partial redevelopment and improvement of the related buildings to provide for community, retail, service, local business uses and residential uses, including affordable housing, which will complement the new Hampton Square.
- Any scheme should include improvements to pedestrian routes where possible and adequate car parking needs to be retained to meet the needs of the community centre and new uses.
- The redevelopment should ensure that it creates an attractive setting for the rejuvenated Square and that it contributes to creating an active and lively local centre.
- The green open space to the south of the site is designated Public Open Space and Other Open Land of Townscape Importance. Any proposal for redevelopment of this site should ensure that it establishes a positive relationship with the adjoining green space, and where possible enhance its setting.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Village Planning Guidance SPD for Hampton.



## SA 2 Platts Eyot, Hampton

Regeneration of the island by maintaining, and where possible enhancing, existing river-dependent and river-related uses. New business and industrial uses (B1, B2 and B8) that respect and contribute to the island's special and unique character are encouraged. Residential development to allow for the restoration of the listed buildings, especially those on the Heritage at Risk Register, may be appropriate.

- There is a need to retain and protect the island's unique employment and business uses, particularly the river-related uses, including the docks, wharves and slipways.
- Of the five listed buildings on Platts Eyot, four are on the Heritage at Risk Register, as well as the Conservation Area covering the island. There is a need to ensure that these designated heritage assets, and the wider character of the island, are improved and enhanced.
- It is acknowledged that some residential development may be needed to support the restoration of the listed buildings; this should be limited to the minimum necessary to achieve viability.
- Residential uses should complement the existing character of the island as well as maintain and where possible improve the appearance. They should not prejudice the continued operation of existing river-dependent and river-related uses.
- There is restricted access to the island and any proposed scheme will need to address the issue of providing safe access and egress in the event of flooding; this is also likely to limit the amount of residential development on the island. Very limited vehicular access may be appropriate, provided that this would not adversely impact on the character and appearance of the island.
- The Council will work closely with the Environment Agency to understand the issues relating to the provision of safe access / egress to and from the island.
- The Council is committed to working in partnership with the site owners to develop a Masterplan or development brief for the island.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Village Planning Guidance SPD for Hampton.



### SA 3 Hampton Traffic Unit, 60-68 Station Road, Hampton

Appropriate land uses include business (B1), employment generating and other commercial or social and community infrastructure uses. The Building of Townscape Merit should be retained and a pedestrian link should be provided through the site.

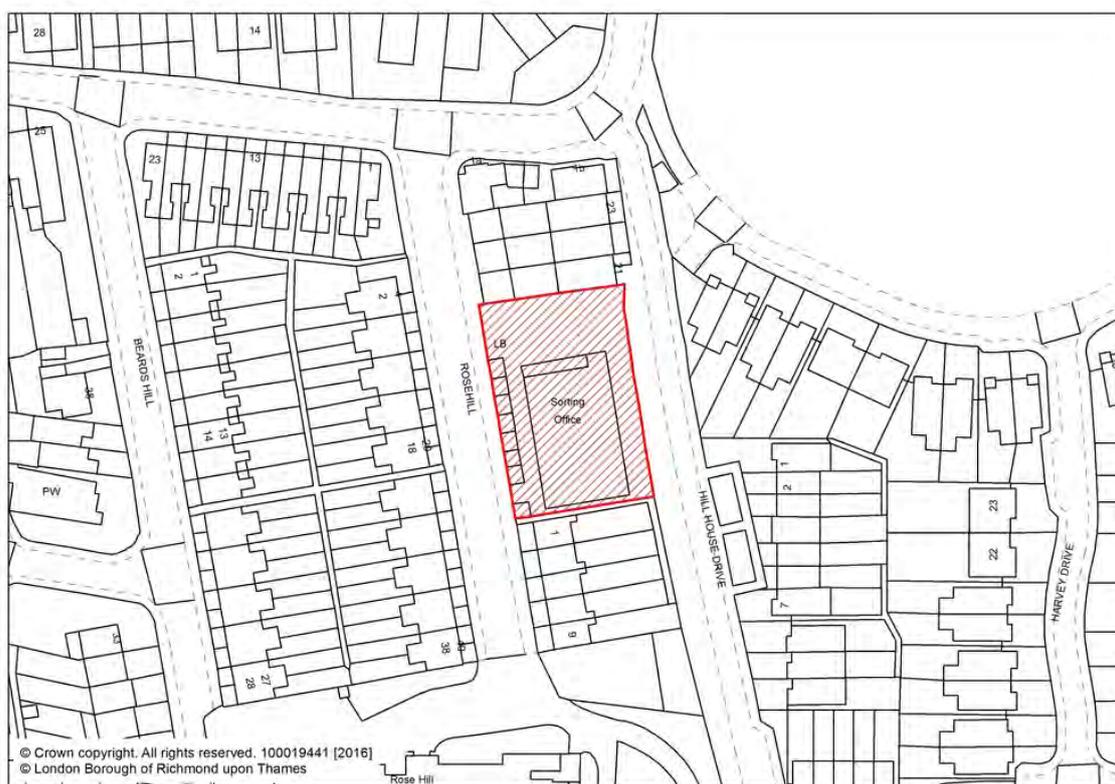
- The site is within the designated Hampton Village local centre.
- The site is within the Hampton Village Conservation Area and the whole building is a Building of Townscape Merit and should be retained.
- The site was declared surplus to requirements by the Metropolitan Police in 2015 and is now in private ownership. It is recognised that a planning application for 28 residential units has been granted permission.
- The evidence suggests there is a need for employment generating and other commercial or social infrastructure uses in this area.
- Only if other employment generating, commercial and social infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with affordable housing and on-site car parking be considered as a potential redevelopment option.
- Any proposed scheme should create a pedestrian link through the site between Station Avenue and Beveree Sports Ground.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Village Planning Guidance SPD for Hampton.



## SA 4 Hampton Delivery Office, Rosehill, Hampton

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

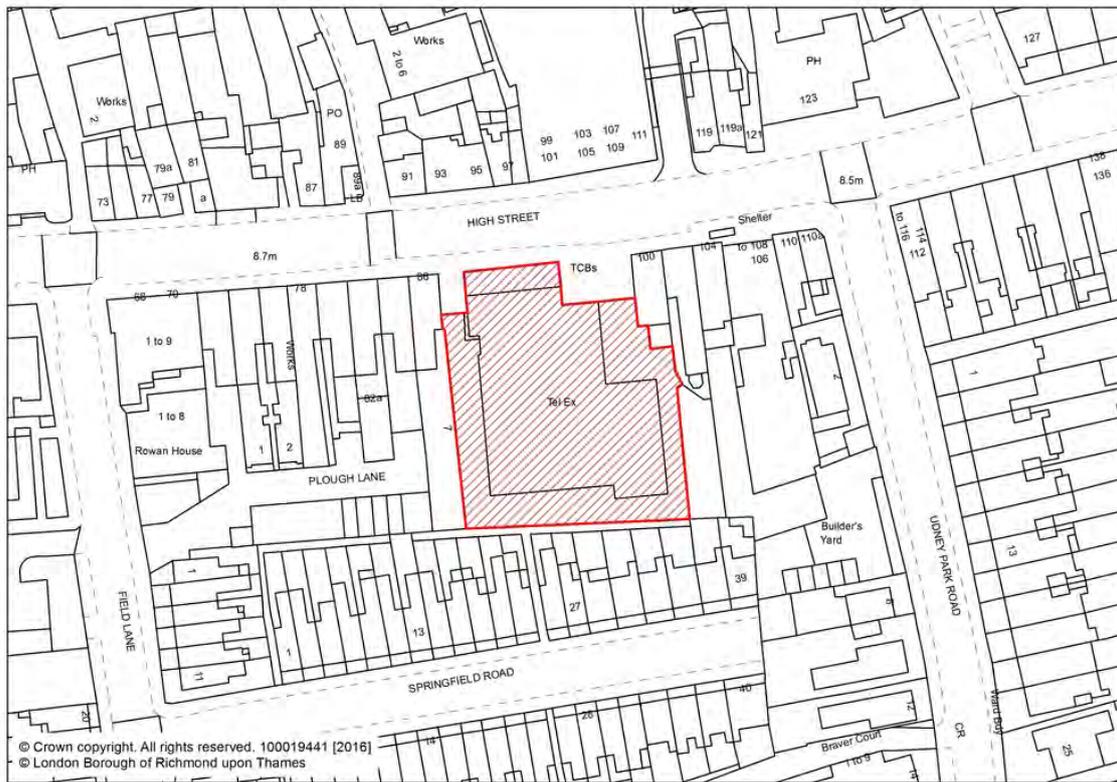
- As of 2016, Royal Mail has no plans to relocate operations from this delivery office. However, if the site is declared surplus to requirements by the Royal Mail in the longer term, the evidence suggests there is a need for employment generating and social infrastructure uses in this area.
- Residential uses may also be appropriate as part of a mixed use scheme.
- Only if other employment generating, commercial and social infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with affordable housing and on-site car parking be considered as a potential redevelopment option.
- The site is located within the Hampton Village Conservation Area, and any proposed scheme has to be compatible with, and complement, the surrounding residential area.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Village Planning Guidance SPD for Hampton.



## SA 5 Telephone Exchange, Teddington

If the site is declared surplus to requirements, appropriate land uses include commercial / retail on the ground floor, especially in the designated key shopping frontage facing the High Street. Any proposal should provide for employment floorspace, such as B1 offices. A mixed use scheme with housing (including affordable housing) in upper floors and to the rear of the site could be considered.

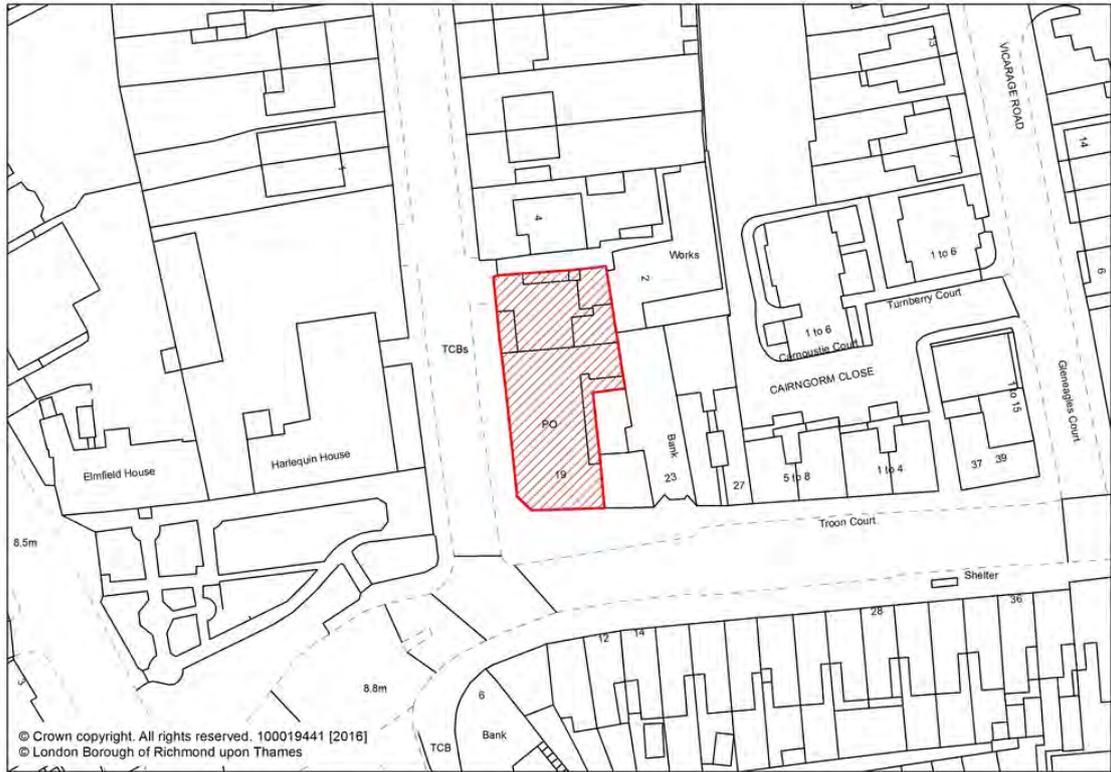
- The site is located within Teddington's main centre boundary and partly designated as a key shopping frontage.
- The site is subject to being declared surplus to requirements by British Telecom.
- The Council's Retail Study forecasts a requirement for ca. 2000sqm (gross) of A1 to A5 uses for Teddington, of which approximately half of this requirement is for comparison retail (A1).
- This site could accommodate around two thirds of Teddington's retail need at ground floor level.
- Any redevelopment proposal should provide for commercial / retail floorspace on the ground floor and create an attractive frontage, including retaining the open area fronting the High Street.
- As this is a site in one of the borough's main centres, there is an expectation that any proposal provides employment floorspace, particularly B1 offices.
- The site is within the High Street Teddington Conservation Area, and any redevelopment proposal will need to respect its character and the settings of the listed buildings on the opposite side of the High Street.
- Only if other commercial or employment generating uses have been explored and options discounted in line with other policies in this Plan, would the provision of housing, including affordable housing, in upper floors and to the rear of the site as part of a mixed use scheme, be considered as a potential redevelopment option.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Village Planning Guidance SPD for Hampton Wick and Teddington.



## SA 6 Teddington Delivery Office, Teddington

If the site is declared surplus to requirements, appropriate land uses include commercial / retail on the ground floor, especially in the designated key shopping frontage facing the High Street. Any proposal should provide for employment floorspace, including B1 offices. A mixed use scheme with housing (including affordable housing) in upper floors and to the rear of the site could be considered.

- The site is located within Teddington's main centre boundary and partly designated as a key shopping frontage.
- The site is within the High Street Teddington Conservation Area and the building is partly designated as Building of Townscape Merit. Any redevelopment proposal should be modest, and conserve and, where appropriate, enhance the Conservation Area, and retain the Building of Townscape Merit.
- As of 2016, Royal Mail has no plans to relocate operations from this delivery office. However, if the site is declared surplus to requirements by the Royal Mail in the longer term, the evidence suggests there is a need for commercial / retail as well as employment use.
- The Council's Retail Study forecasts a requirement for ca. 2000sqm (gross) of A1 to A5 uses for Teddington, of which approximately half of this requirement is for comparison retail.
- This site could accommodate around 400sqm of retail at ground floor.
- Any redevelopment proposal should provide for commercial / retail on the ground floor, particularly facing the High Street (taking account of the Building of Townscape Merit designation and subject to feasibility and viability of altering the elevations).
- As this is a site in one of the borough's main centres, there is an expectation that any proposal provides employment floorspace, particularly B1 offices.
- Only if other commercial or employment generating uses have been explored and options discounted in line with other policies in this Plan, would the provision of housing, including affordable housing, in upper floors and to the rear of the site as part of a mixed use scheme, be considered as a potential redevelopment option.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Village Planning Guidance SPD for Hampton Wick and Teddington.



## SA 7 Strathmore Centre, Strathmore Road, Teddington

Social and community infrastructure uses and/or an affordable housing scheme with on-site car parking are the most appropriate land uses for this site.

- This site has an existing social infrastructure use, which provides a complete range of child-care services for children up to and including Year 6, as well as acting as a nursery to pre-school aged children.
- It is acknowledged that the site has currently poor access provision; it is also located in a low Public Transport Accessibility Level (PTAL) area
- There is an increasing need for the provision for childcare facilities and nurseries in the borough.
- This site, due to its location in a primarily residential area and its proximity to Stanley School and St James's school, makes it ideal for the provision of nurseries and other child-care services.
- Proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way, including the provision of appropriate outside space and parking related to the childcare services, or elsewhere in a convenient alternative location accessible to the current community it supports.
- Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would an affordable housing scheme with on-site car parking be considered as a potential redevelopment option.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Village Planning Guidance SPD for Hampton Wick and Teddington.

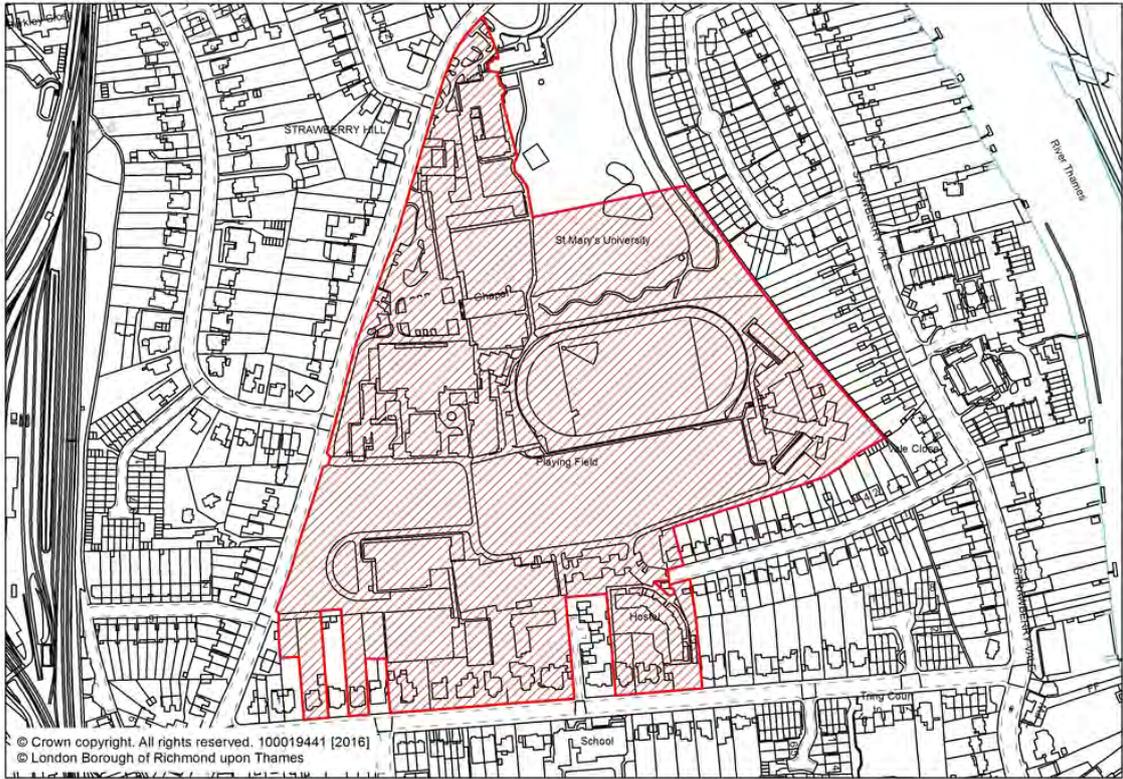


## SA 8 St Mary's University, Strawberry Hill

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

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

- There is a need to take account of the growing demand for university places.
- There is a need to improve and upgrade the existing facilities at St Mary's University as well as a need to provide additional educational floorspace, student residential accommodation and other associated facilities.
- The Council will support and work with St Mary's University to ensure it remains a highly regarded, competitive and viable higher education facility in the future and to assist in meeting the future educational needs of students.
- It is acknowledged that this is a constrained site, with the majority of land not built on designated as Metropolitan Open Land.
- There are also listed buildings, Buildings of Townscape Merit as well as sports playing fields. Any development proposal has to take account of the highly significant heritage assets and respect the special and unique location and setting of St Mary's University, including the Grade I listed Chapel, the adjoining Grade I listed building (Strawberry Hill House) and the associated Historic Park and Garden (II\*) as well as the high quality Edwardian villas within the Waldegrave Park Conservation Area.
- The existing playing fields and sports facilities should be retained and/or re-provided, and if necessary, replacement facilities will have to be provided on or off site.
- The Council will work with the University on a Masterplan and/or site development brief (SPD) for the longer term upgrading of their sites (main campus at Strawberry Hill and Teddington Lock) to meet the demand for additional teaching, sport and student residential accommodation, taking account of existing site constraints and with the aim to improve and enhance the Metropolitan Open Land, including views and vistas.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out within the Strawberry Hill Village Planning Guidance SPD, and where relevant within the Masterplan / site development brief.



## SA 9 Richmond upon Thames College, Twickenham

Redevelopment to provide a new replacement college, science / technology / engineering / maths centre, technical hub (B1), a new secondary school and special education needs school, sports centre as well as residential including affordable housing. Protection and upgrading of the playing field to the south of the college, including the installation of a new artificial grass (3G) playing pitch.

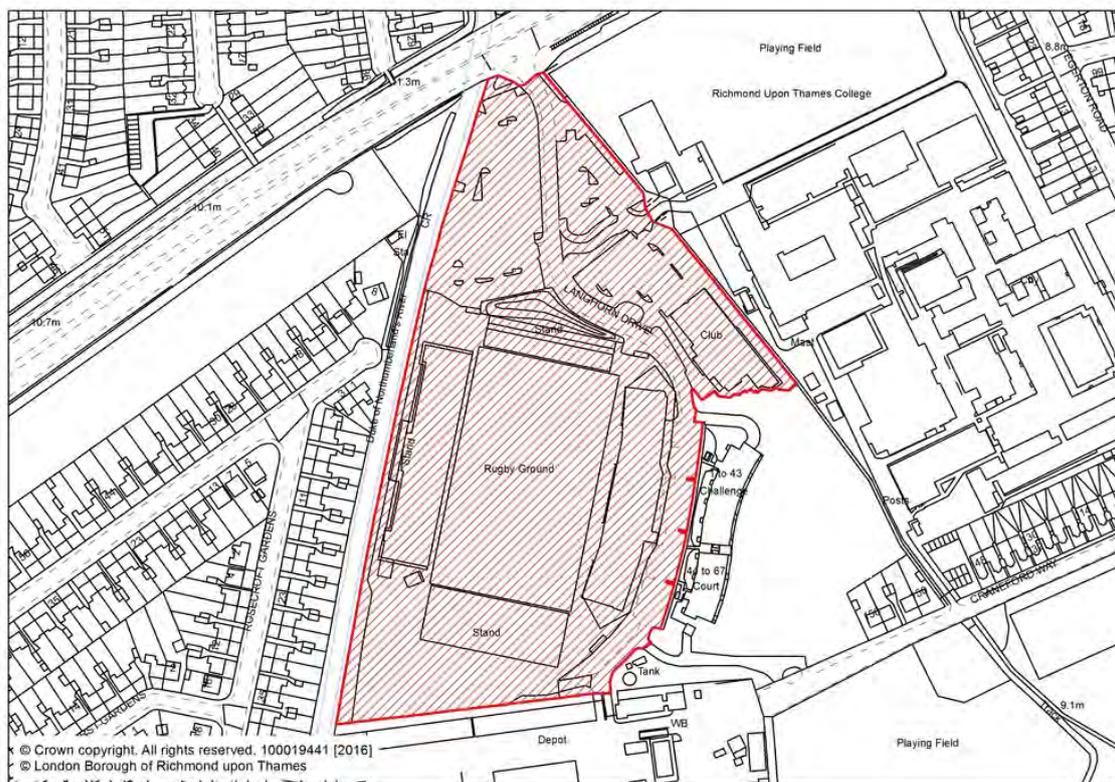
- There is a clear identified need for a new campus for education and enterprise, including in particular a new secondary school.
- A comprehensive redevelopment scheme is supported on this site, providing for a variety of educational needs in the borough, together with associated supporting residential development.
- Multi-use is sought for the educational and sports facilities, in line with other policies in this Plan.
- The Council will work closely with partners, including Transport for London and Harlequins Rugby Football Club, to ensure the development does not lead to harmful impacts on the local road network.
- Any development proposal is required to protect and, where possible, enhance, the River Crane corridor.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Twickenham Village Planning Guidance SPD.



## SA 10 The Stoop (Harlequins Rugby Football Club), Twickenham

The Council supports the continued use of the grounds for sports uses. Appropriate additional facilities including a new north stand, indoor leisure, hotel or business uses, may be supported provided that they are complementary to the main use of the site as a sports ground.

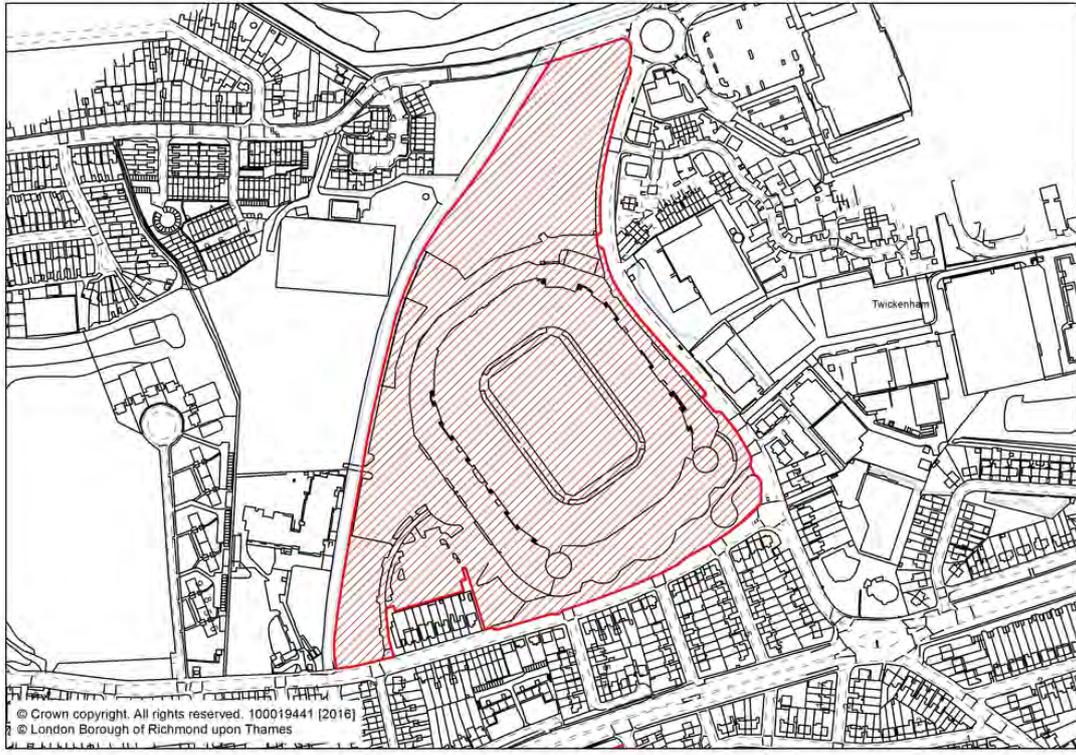
- There is a need to retain, and where possible enhance, the continued use of this site as a sports ground.
- The Council will work in partnership with Harlequins RFC to understand the potential need for associated new facilities, such as a new north stand, indoor leisure (gym/training facilities), business uses or potentially a hotel.
- Any additional uses need to be complementary to the main use of the site as a sports ground; new uses should therefore be associated with, and not detract from, the main sports use of this site.
- Multi-use is sought for the sports and associated facilities, in line with other policies in this Plan.
- The Council will work closely with partners, including Transport for London and Harlequins RFC, to ensure the development does not lead to harmful impacts on the local road network.
- Any development proposal is required to protect and, where possible, enhance, the River Crane corridor as well as the Duke of Northumberland River, as well as the setting of the Rosecroft Conservation Area.
- The Council is committed to working in partnership with Harlequins RFC to develop a Masterplan, which should set out the long-term strategy for development of this site.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Twickenham Village Planning Guidance SPD.



## SA 11 Twickenham Stadium, Twickenham

The Council supports the continued use and improvement of the grounds for sports uses. Appropriate additional facilities including a new east and north stand, indoor leisure, hotel or business uses, as well as hospitality and conference facilities, may be supported provided that they are complementary to the main use of the site as a sports ground.

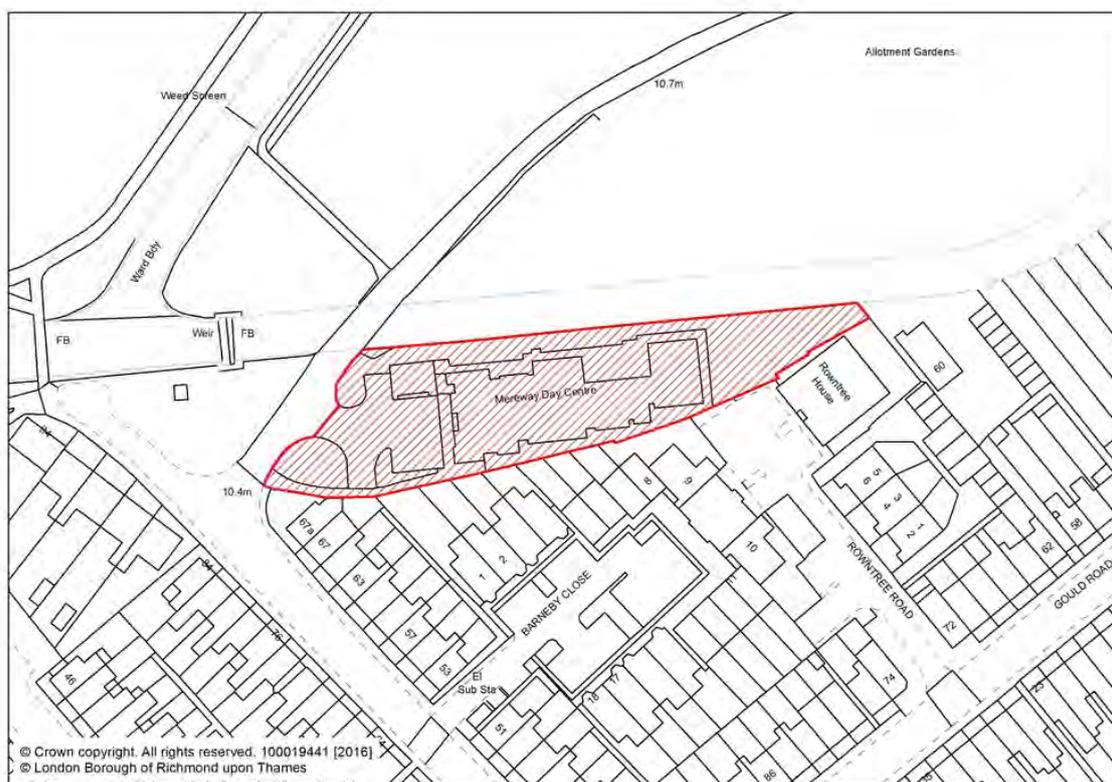
- There is a need to retain, and where possible enhance, this nationally important sporting venue with its associated facilities to ensure it remains a world class standard of facilities and visitor experience.
- The Council will work in partnership with the Rugby Football Union (RFU) to understand the potential need for associated new and complementary facilities such as a hotel, leisure centre, training facilities as well as hospitality and conference facilities. The applicant will have to demonstrate that additional facilities do not lead to harmful impacts on the vitality and viability of Twickenham centre.
- Multi-use is sought for the sports and associated facilities, in line with other policies in this Plan.
- There is a general need for new office floorspace in the borough and in the event of an area of the site being declared surplus to requirements, the opportunity to provide for employment floorspace, such as offices or a business park, should be firstly explored. A mixed use scheme, which may include residential including affordable housing, may also be considered appropriate provided that other sporting and associated uses, including employment, have been fully investigated and that the mixed / residential use is compatible with the main use of the site, i.e. a national stadium, also taking into account the presence of the existing sewerage treatment works to the north of the site and residential amenity.
- There is a need to retain sufficient parking, particularly for coaches, servicing facilities and space for spectators and related services. Any further development should not lead to harmful impacts on parking, congestion and the wider local road network.
- Any development proposal is required to protect and, where possible, enhance, the Duke of Northumberland River, including access to it, and the associated Metropolitan Open Land.
- The Council is committed to working in partnership with the RFU to develop a Masterplan, which should set out the long-term strategy for development of this site.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Twickenham Village Planning Guidance SPD.



## SA 12 Mereway Day Centre, Mereway Road, Twickenham

Social and community infrastructure uses are the most appropriate land uses for this site.

- There is a disused day centre on this site.
- There is an increasing need for the provision of childcare facilities and nurseries in the borough.
- This is an existing social infrastructure site and due to its location in a primarily residential area, it could provide an ideal location for the provision of nurseries and other child-care services.
- It is acknowledged that the site has currently poor access provision; it is also located in a low Public Transport Accessibility Level (PTAL) area.
- Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with affordable housing and on-site car parking be considered as a potential redevelopment option.
- Any development proposal is required to protect and, where possible, enhance the River Crane corridor.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the relevant Village Planning Guidance SPD.



## SA 13 Telephone Exchange, Whitton

If the site is declared surplus to requirements, appropriate land uses include employment and social infrastructure or other appropriate main centre uses. Any proposal should provide for employment floorspace, including B1 offices. A mixed use scheme with housing, including affordable housing, could be considered.

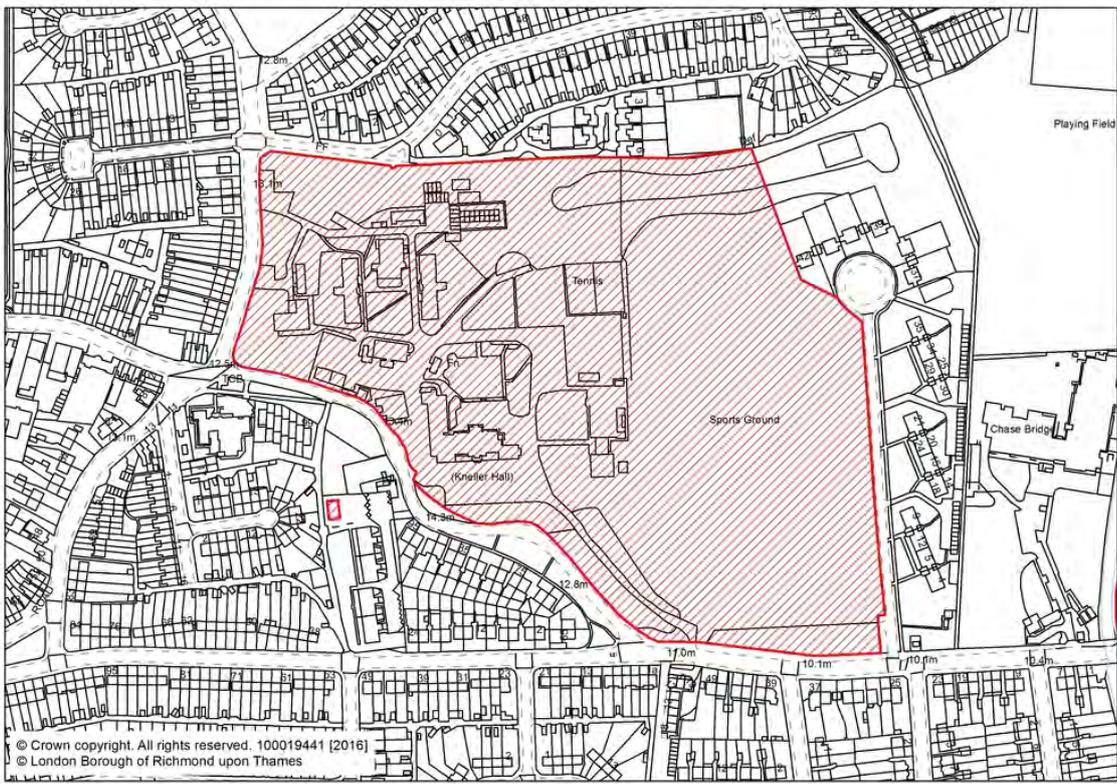
- The site is located within Whitton's main centre boundary.
- The site is subject to being declared surplus to requirements by British Telecom.
- As this is a site in one of the borough's main centres, there is an expectation that any proposal provides employment floorspace, particularly B1 offices.
- Any redevelopment proposal should provide for employment and social infrastructure or other appropriate main centre uses.
- Only if other main centre uses as well as social infrastructure or community uses have been explored and options discounted in line with other policies in this Plan, would a mixed use scheme with housing, including affordable housing, be considered as a potential redevelopment option.
- The opportunity should be taken for a comprehensive redevelopment of the area and ensure that the site establishes a positive relationship with the surrounding area, including the car park, library and high street. This should include increased permeability for pedestrians and cyclists from this site through the car park to the High Street.
- The applicant/owner will be expected to work together with the Council and adjoining landowners to bring forward a scheme that contributes to the vitality and viability of Whitton centre.
- Design objectives and general guidance relating to the local character of the area, which the redevelopment of this site should have regard to, is set out in the Whitton and Heathfield Village Planning Guidance SPD.



## SA 14 Kneller Hall, Whitton

It has been announced that Kneller Hall will be released for disposal. Appropriate land uses include residential (including affordable housing), employment (B uses) and employment generating uses as well as social infrastructure uses, such as health and community facilities. Any proposal should provide for some employment floorspace, including B1 offices. The Council will expect the playing fields to be retained, and the provision of high quality public open spaces and public realm, including links through the site to integrate the development into the surrounding area as well as a new publicly accessible green and open space, available to both existing and new communities.

- Kneller Hall, the ‘home of military music’, is currently occupied by the Royal Military School of Music.
- Defence Minister Mark Lancaster announced the release of Kneller Hall on 18 January 2016. This was confirmed in the document 'A Better Defence Estate', Nov 2016, where it was stated that there was an intention to release Kneller Hall for disposal in 2020.
- It is acknowledged that conversion or potential redevelopment for residential uses may be needed to support the protection and restoration of the listed building. The provision of residential uses (including affordable housing), will need to respect the site’s setting within the historic core of Whitton and ensure that any proposal integrates well within the existing surrounding area and existing Whitton community.
- It is expected that this site will provide some employment uses (B uses), including lower cost units suitable for small businesses, the voluntary sector, creative industries and scientific and technical businesses including green technology. Other employment generating uses, such as a hotel, may also be supported.
- Social infrastructure and community uses, such as leisure, sport and health uses, should be incorporated and the need for such facilities should be fully explored.
- It is expected that the existing playing fields will be retained and where possible upgraded, such as with ancillary facilities, including changing provided to support the use of the playing fields, provided that any existing ecological benefits and the openness and character of the Metropolitan Open Land is retained and, where possible enhanced.
- Any redevelopment proposal for the whole site will require the restoration and enhancement of the existing Grade II listed building (Kneller Hall). The reuse of this historic building offers an excellent opportunity to ensure the site incorporates and promotes a cultural and historic legacy of the ‘home of military music’. Any development should be sensitive to the significance of the historic building and respond positively to the setting of the listed building.
- Parts of the site are designated as Metropolitan Open Land and development in this area would not be acceptable. There is an expectation that any redevelopment proposal improves the character and openness of the Metropolitan Open Land.
- Any scheme will need to ensure that the site establishes a positive relationship with the surrounding area. This should also include increased permeability for pedestrians and cyclists through the site.
- A Masterplan / site development brief will be prepared in conjunction with the Council and in cooperation with local communities. This will guide future development and land uses for this site, and determine the appropriate scale, form and design of development, ensuring that the scheme also contributes to the vitality and viability of Whitton as a whole.
- Design objectives and general guidance relating to the local character of the area, which the redevelopment of this site should have regard to, is set out in the Whitton and Heathfield Village Planning Guidance SPD.

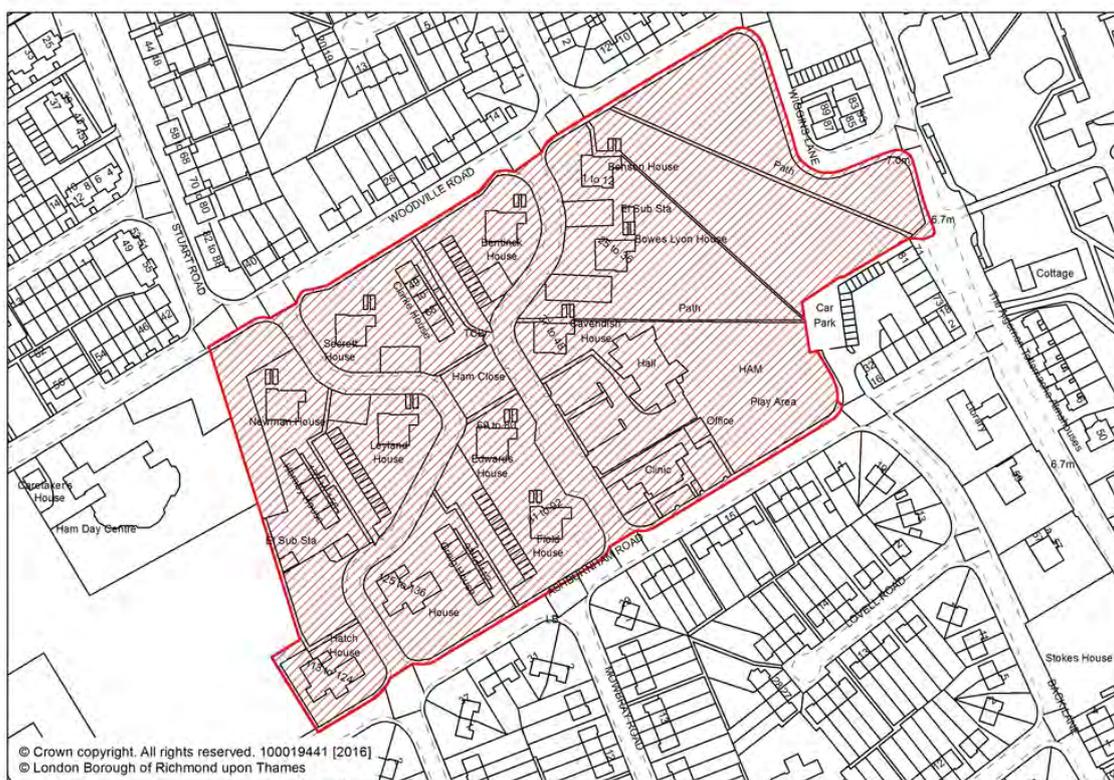


## SA 15 Ham Close, Ham

The Council supports the regeneration of Ham Close and will work in cooperation with Richmond Housing Partnership in order to rejuvenate Ham Close and its surrounding area.

A comprehensive redevelopment of this site, including demolition of the existing buildings and new build re-provision of all residential and non-residential buildings, plus the provision of additional new residential accommodation, will be supported.

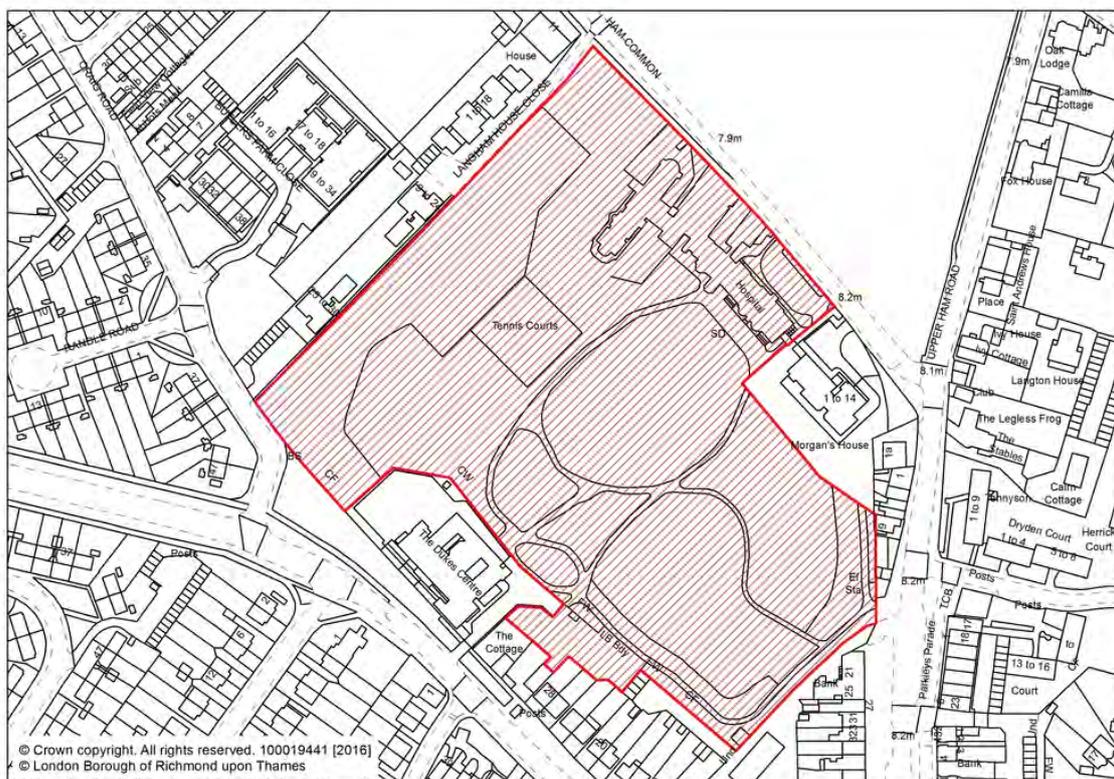
- Richmond Housing Partnership is the freeholder of the 192 flats at Ham Close.
- The flats are generally of poor construction, with poor insulation by modern standards, and many have condensation and damp issues. The blocks of flats do not have lifts, thus leaving a number of flats inaccessible to people with disabilities.
- Any redevelopment proposal has to respond positively to the unique and distinctive character of Ham Close and Ham, including the setting of the adjacent Ham House Conservation Area and the many listed buildings and Victorian properties that line the frontage.
- There is a need to retain, and where possible enhance, the landscape and existing green spaces, including the Green, which is designated Public Open Space and Other Open Land of Townscape Importance, as well as trees wherever possible.
- Optimising the use of the land by providing high quality living spaces for both existing as well as new residents of Ham Close.
- Servicing, car and cycle parking should be provided as part of the regeneration of the area and any development should enhance the quality of the local townscape, thereby creating a more cohesive sense of place.
- The Council will work in cooperation with Richmond Housing Partnership to develop a Masterplan for this site, which will set out the principles and parameters for redevelopment.
- Further information can be found on the dedicated [Ham Close website](#).
- There is also a need to take account of the emerging Ham and Petersham Neighbourhood Plan, which may set out further guidance on the design and appearance of any development proposal.



## SA 16 Cassel Hospital, Ham Common, Ham

If the site and the Grade II listed Cassel Hospital are declared surplus to requirements, social and community infrastructure uses are the most appropriate land uses for this site. Conversion or potential redevelopment for residential uses could be considered if it allows for the protection and restoration of the listed buildings.

- The site is owned by the West London Mental Health Trust and provides national specialist assessment and treatment services for young people and adults with complex personality disorders.
- It is acknowledged that any proposal would be subject to the hospital being declared surplus to requirements by the NHS Trust and will be dependent on their decision on how much of the site they need to retain for their own future needs.
- If the site is declared surplus to requirements, in whole or part, appropriate land uses include social and community infrastructure uses.
- Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with affordable housing and on-site car parking be considered as a potential redevelopment option.
- It is acknowledged that conversion or potential redevelopment for residential uses may be needed to support the protection and restoration of the listed buildings; residential uses should however be limited to the minimum necessary to achieve viability.
- The grounds to the rear and to the side are designated as both Other Site of Nature Importance and Other Open Land of Townscape Importance and development in this area would not be acceptable.
- The restoration and conversion has to respect the significance of the heritage asset, protect and enhance the listed buildings, ensuring their sensitive repair and re-use, and the Ham Common Conservation Area and their settings. The settings of neighbouring listed buildings including the Grade II\* listed properties, will also need to be considered as part of any development on this site.
- There is also a need to take account of the emerging Ham and Petersham Neighbourhood Plan, which may set out further guidance on the design and appearance of any development proposal.



## SA 17 St Michael's Convent, Ham Common

The Grade II listed St Michael's Convent and The Cottage have been declared surplus to requirements, social and community infrastructure uses are the most appropriate land uses for this site. Conversion or potential redevelopment for residential uses could be considered if it allows for the protection and restoration of the listed buildings.

- The site has been declared surplus to requirements by the Sisters of the Convent, who have vacated the site in 2017.
- Appropriate land uses include social and community infrastructure uses.
- Only if other alternative social or community infrastructure uses have been explored and options discounted in line with other policies in this Plan, would a residential-led scheme with affordable housing and on-site car parking be considered as a potential redevelopment option.
- It is acknowledged that conversion or potential redevelopment for residential uses may be needed to support the protection and restoration of the listed buildings; residential uses should however be limited to the minimum necessary to achieve viability.
- Parts of the gardens (as shown on the corresponding map) are designated as Other Open Land of Townscape Importance and Other Site of Nature Importance (OSNI), and therefore development in this area would not be acceptable.
- The settings of neighbouring heritage assets including Grade II\* registered Ham House Historic Park and Garden of special historic interest, including other adjacent Grade II listed properties will also need to be considered as part of any development on this site.
- There is also a need to take account of the emerging Ham and Petersham Neighbourhood Plan, which may set out further guidance on the design and appearance of any development proposal.



## SA 18 Ryde House, East Twickenham

Any redevelopment proposal for this site will be required to prioritise the provision of a new 2-form entry primary school. In conjunction with the educational use, the provision of retail is considered appropriate in this location.

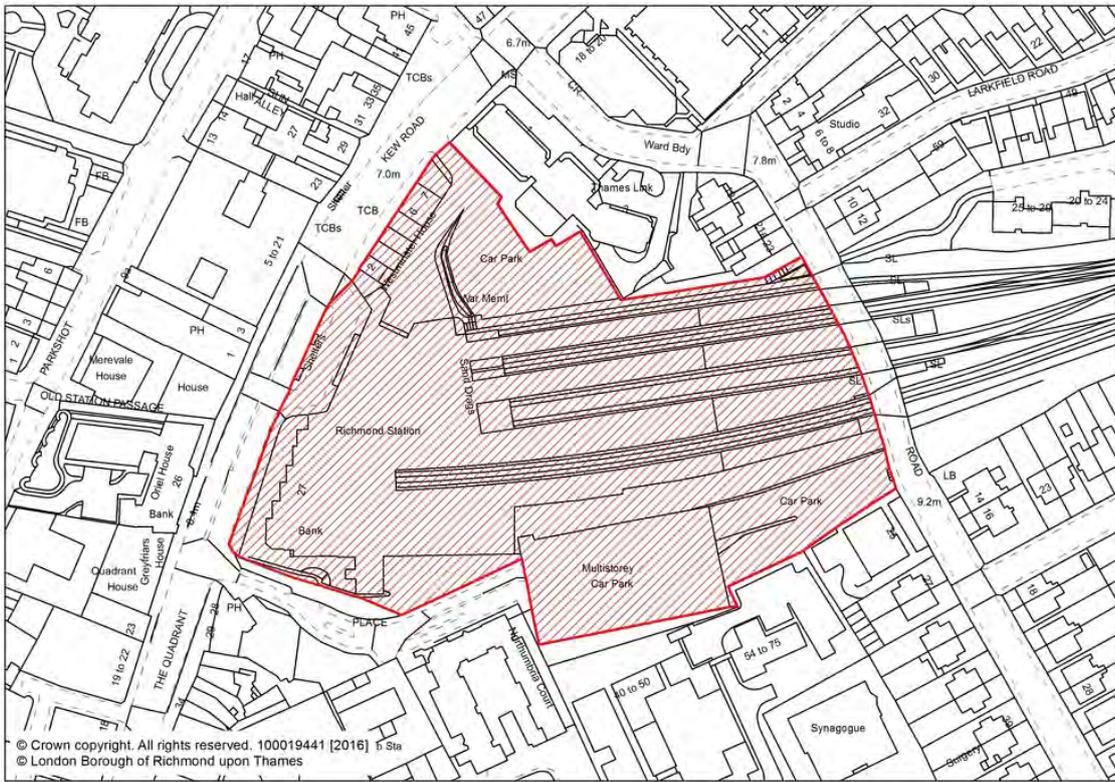
- The site is located within the East Twickenham local centre.
- There is a clear need for a new 2-form of entry primary school in the East Twickenham area as set out in the Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to prioritise the provision of education facilities.
- The site is owned by a supermarket and lies within a local centre. Therefore, a mixed use scheme, consisting of retail and a primary school, is appropriate.
- The Council's Retail Study suggests this site could provide approximately 1,000sqm gross of retail space at ground floor level.
- The introduction of a retail use on the ground floor facing Richmond Road should add to the viability and vitality of this centre.
- The site is within the Richmond Road (East Twickenham) Conservation Area, and any redevelopment proposal needs to have special regard to the setting of the Grade II listed adjoining Ryde House.
- Design objectives and general guidance relating to the local character of the area, which the redevelopment of this site should have regard to, is set out in the East Twickenham Village Planning Guidance SPD.



## SA 19 Richmond Station, Richmond

Comprehensive redevelopment to provide an improved transport interchange and an appropriate mix of main centre uses. This includes as a priority the provision of retail floorspace as well as employment floorspace. Appropriate main centre uses, such as other employment generating uses as well as social infrastructure and community uses should also be provided. The provision of housing (including affordable housing) in upper floors as part of a mixed use scheme would be appropriate.

- This is a key development site and gateway into Richmond main centre, set within the Richmond Central Conservation Area.
- There is a need for comprehensive redevelopment, including transport interchange improvements (both National Rail and London Underground).
- The station is a designated Building of Townscape Merit, although the visual character lies principally in the façade and booking hall, with the side and rear of the buildings being unattractive and not contributing to the setting.
- Any redevelopment proposal must be of the highest quality in character and respond positively to the Conservation Area.
- The Council's Retail Study forecasts a requirement for approximately 10,000sqm (gross) of retail floorspace. This site plays a key role in delivering this requirement.
- This site is located in the borough's largest centre and therefore there is an expectation that any proposal makes a substantial provision of employment floorspace, particularly B1 offices.
- An appropriate mix of main centre uses should bring additional benefits to Richmond centre and enhance its vitality and viability by complementing and linking well with the surrounding areas. Therefore, other uses, such as for community, leisure and entertainment, would also be appropriate.
- The provision of housing (including affordable housing) in upper floors as part of a mixed use scheme would be appropriate.
- The Council has produced and adopted a [development brief](#) for this site, which provides further guidance on the site's characteristics, constraints, land use and development opportunities. The Council intends to update this SPD.
- Design objectives and general guidance relating to the local character of the area, which the redevelopment of this site should have regard to, is also set out in the Richmond Village Planning Guidance SPD.



## SA 20 Friars Lane Car Park, Richmond

The Council supports the redevelopment of the existing under-utilised car park to provide housing, including affordable housing.

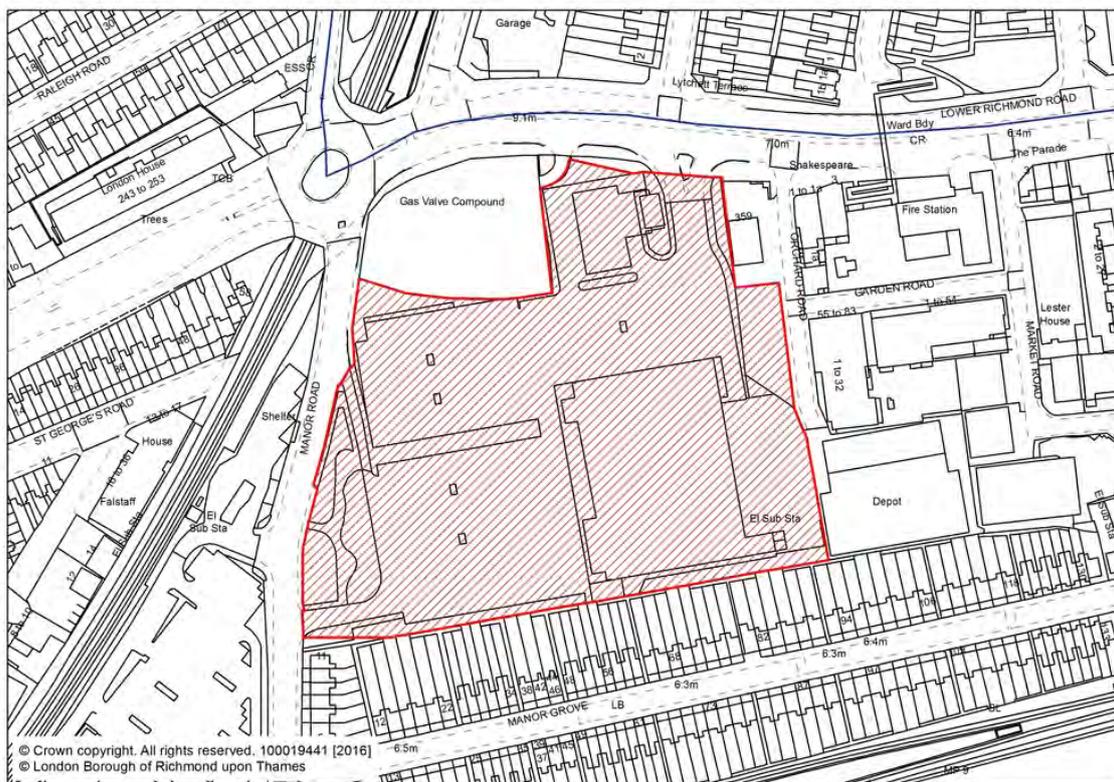
- The evidence suggests that this is an under-utilised existing car park and that there is sufficient space in other Richmond car parks.
- The principal for the redevelopment of this site for residential use was established in 2005 as part of the Unitary Development Plan.
- The Council considers that the provision of housing would optimise the use of this site.
- Any redevelopment scheme should enhance the setting of the Richmond Riverside Conservation Area as well and the surrounding Grade II listed buildings.
- The Council has produced and adopted a [development brief](#) for this site, which provides further guidance on the site's characteristics, constraints, land use and development opportunities.
- Design objectives and general guidance relating to the local character of the area, which the redevelopment of this site should have regard to, is also set out in the Richmond Village Planning Guidance SPD.



## SA 21 Sainsbury's, Lower Richmond Road, Richmond

The Council will support comprehensive redevelopment of this site to provide for retail and residential uses. The continued use of the site as a foodstore and the re-provision of the existing retail floorspace is required.

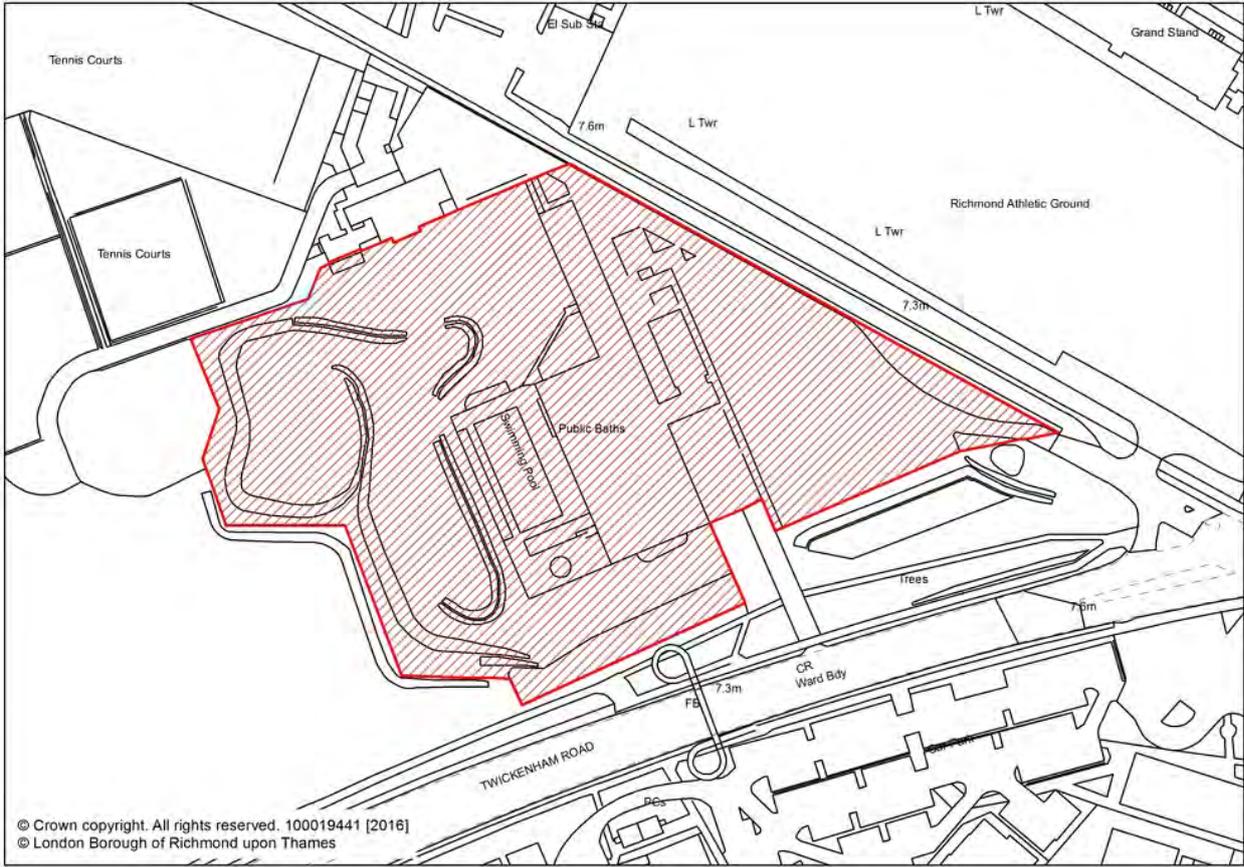
- The existing foodstore is well established and a key facility for the local community.
- The site is located adjacent to the Gas Valve Compound and any redevelopment proposal needs to take account of its proximity to the gas pipeline.
- Redevelopment of this foodstore provides an opportunity to optimise the use of the site and it is acknowledged that any redevelopment proposal may necessitate a period of closure and / or a loss of trade during construction.
- Any redevelopment proposal will be required to retain and/or re-provide the existing retail floorspace.
- There is a need for housing in the borough and this site is considered to be suitable for a substantial provision of new housing units.
- There is an expectation that any redevelopment proposal should provide public realm benefits, including improvements to the visual appearance of the area.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is set out in the Richmond Village Planning Guidance SPD.



## SA 22 Pools on the Park and surroundings, Old Deer Park, Richmond

The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional leisure facilities, community and other complementary uses will be supported provided they meet identified needs and do not detract from the main use of the site as a publicly accessible swimming facility. Any proposal would need to be fully justified having assessed the significance of the building and its setting, and having taken into account the wider heritage designations that apply to the site.

- The Council's Indoor Sports Facility Needs Assessment states that there is a concern regarding the ageing stock on this site and this facility needs substantial works and upgrading. A particular concern raised in the Assessment is the cost of maintaining and running the facility due to its age. Furthermore the future population growth of the borough will place further pressure on capacity.
- The Indoor Sports Facility Needs Assessment also suggests that ideally the building should be rebuilt to offer residents a modern swimming experience. In addition, the gym facilities require investment to match the standards in other membership facilities.
- As the existing pools complex is listed as Grade II and the site lies within a Grade I Historic Park and Garden and Conservation Area as well as within the Royal Botanic Gardens, Kew World Heritage Site buffer zone, any proposals will be considered within the context of these designations.
- The significance of the listed status of the Pools complex needs to be understood to inform any scheme on this site and to ensure it respects this significance.
- Comments in relation to the Pools on the Park site were received in relation to consultations undertaken by the Council in 2015 in relation to the Village Plans including:
  - the Pools are seen as a valued asset in the community;
  - the complex looks 'tired' and is seen as unattractive by some local residents;
  - the internal layout is poorly configured and impacts on the attractiveness of the facilities for members; the changing rooms and toddler paddling pool need upgrading; and
  - some residents questioned the Listed status of the building – its design was not considered suitable for its location having a harsh concrete and rigid office block appearance.
- A SPD for the overall Old Deer Park Conservation Area is currently being developed by the Council.



## SA 23 Richmond Athletic Association Ground, Old Deer Park, Richmond

The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional associated leisure facilities and other complementary uses could be incorporated provided they have been fully justified as being necessary to support the continued sporting uses on the site, that they demonstrate meeting identified needs, do not detract from the main use of the site as a sports ground, and have been developed to take account of the Metropolitan Open Land (MOL) and historic designations.

- The evidence as set out in the Council's Playing Pitch Strategy suggests that the sports ground needs to be retained; however, improvements are required in relation to the existing facilities including to the changing facilities and the quality of the playing pitches as a result of them currently being 'overplayed'.
- The Council supports the principle of improvement and upgrading of facilities to support the sports uses on this site.
- The whole site is designated as MOL and therefore inappropriate development would not be acceptable. As the pavilion is listed as Grade II and the site lies within a Grade I Historic Park and Garden and Conservation Area as well as within the Royal Botanic Gardens, Kew World Heritage Site buffer zone, any proposals will be considered within the context of these designations.
- It is acknowledged that any improvement and upgrading of the existing sports facilities may require additional development to support the costs of improving/replacing existing facilities. Recognising the historic and policy designations relating to the site any such development would need to be clearly justified, be for associated leisure and other complementary uses and provide for a comprehensive development approach for the whole site, and demonstrate that the character and appearance of the site as well as its historic significance is improved and enhanced.
- Comments in respect of the Richmond Athletic Ground site were received during consultations undertaken by the Council in 2015 relation to the Village Plans including:
  - residents enjoy using the facilities;
  - landscaping improvements are needed;
  - the main grandstand, and the Cannons Health Club and Old Golf Driving Range buildings and surroundings are in a poor state, with some suggesting they need to be demolished and rebuilt; and
  - the desire to see the rugby clubs stay in Richmond.
- A SPD for the overall Old Deer Park Conservation Area is currently being developed by the Council.

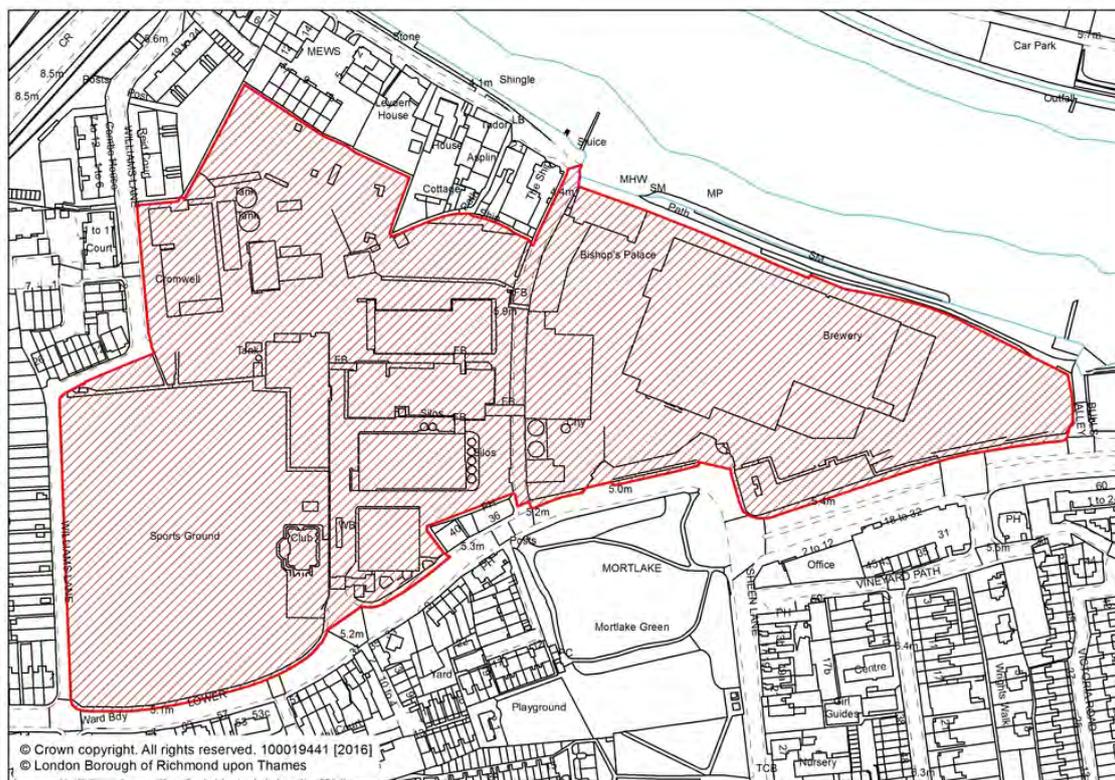


## SA 24 Stag Brewery, Lower Richmond Road, Mortlake

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

- The Council has produced and adopted a [development brief](#) in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities. Any proposed development should have due regard to the adopted brief.
- The brewery operations on this site have ceased at the end of 2015; the site has been marketed and sold.
- There is a need to create a new village heart and centre for Mortlake, which should add to the viability and vitality of this area, for both existing as well as new communities.
- There is a clear need for a new 6-form of entry secondary school, plus a sixth form, in this area, as set out in the Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to allow for the provision of this school.
- Whilst this site is not located within a main centre, it falls within the Mortlake Area of Mixed Use. Therefore, it is expected that this site will provide a substantial mix of employment uses (B uses), including lower cost units suitable for small businesses, creative industries and scientific and technical businesses including green technology. Other employment generating uses will also be supported.
- Retail and other commercial uses, such as cafés and restaurants, will add to the vibrancy of the new centre as well as contributing to the provision of important local employment opportunities.
- Incorporating a mix of uses, including social infrastructure and community as well as leisure, sport and health uses, and attractive frontages should contribute to creating an inviting and vibrant new centre.
- The provision of residential uses (including affordable housing), will ensure that the new village heart becomes a vibrant centre for new communities.
- The site is within an Archaeological Priority Area and partially within the Mortlake Conservation Area. The existing Buildings of Townscape Merit should be retained; the reuse of these historic buildings offers an excellent opportunity to ensure the site incorporates and promotes a cultural and historic legacy, for example by providing an on-site museum. Any development should respond positively to the Conservation Area, including the setting of the listed buildings (Grade II) to the north of the site.
- The site is very close to an Air Quality Focus Area. Therefore strict mitigation measures will be required, both to mitigate any effect on current receptors and highways and on future receptors within the proposed development, particularly for sensitive receptors, such as pupils at the secondary school.

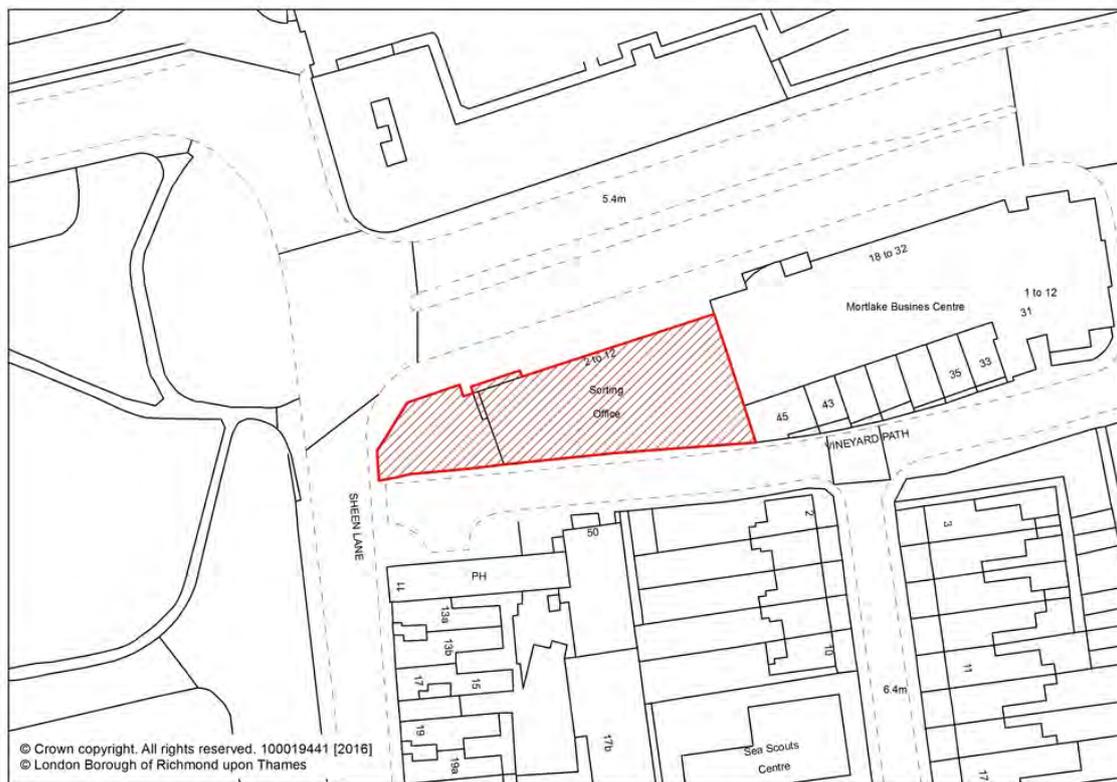
- Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community.
- The playing fields in the south west corner of the site, which are designated Other Open Land of Townscape Importance (OOLTI), should be retained and/or reprovided and upgraded. In the event of reprovion and upgrading, where a comprehensive approach to redevelopment can be taken in line with policy LP 14, it may be acceptable to re-distribute designated OOLTI within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness. In addition, reprovion and upgrading of the playing fields within the site for sport uses has to be carried out in line with policy LP 31, the NPPF and Sport England Policy.
- The adopted development brief (2011) identifies a number of transportation and highway issues. The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where necessary improvements to sustainable modes of travel, including public transport facilities, are secured as part of any development proposal. The opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site should be investigated as part of the comprehensive redevelopment.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Mortlake Village Planning Guidance SPD.



## SA 25 Mortlake and Barnes Delivery Office, Mortlake

If the site is declared surplus to requirements, appropriate land uses include employment or other commercial and retail uses.

- The site is located within the Mortlake Area of Mixed Use.
- As of 2016, Royal Mail has no plans to relocate operations from this delivery office. However, if the site is declared surplus to requirements by the Royal Mail in the longer term, the evidence suggests there is a need for employment or other commercial and retail uses in this area. Such provision should create an attractive frontage to the High Street.
- Only if employment and other commercial or employment generating uses have been explored and options discounted in line with other policies in this Plan, would the provision of housing (including affordable housing) in upper floors as part of a mixed use scheme be considered as a potential redevelopment option.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal on this site should have regard to, is also set out in the Mortlake Village Planning Guidance SPD.



## SA 26 Kew Biothane Plant, Mellis Avenue, Kew

The Council supports the redevelopment of this site to provide for residential uses, including affordable housing, and associated open space provision.

- This site is owned by Thames Water Utilities and its main use was the processing of effluent from the brewing operations on the Stag Brewery site.
- The site has been declared surplus to requirements since the brewery operations ceased.
- Due to its location in a largely residential area, redevelopment for housing, including affordable housing, is considered appropriate.
- The redevelopment of this site provides an opportunity to enhance the environment whilst meeting housing needs.
- Parts of the site are designated as Metropolitan Open Land and development in this area would not be acceptable. There is an expectation that any redevelopment proposal improves the character and openness of the Metropolitan Open Land.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the Kew Village Planning Guidance SPD.



## SA 27 Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen

If the Telephone Exchange is declared surplus to requirements, appropriate land uses for the whole area include employment and commercial uses as well as community and social infrastructure uses. A mixed use scheme with housing (including affordable housing) in upper floors and to the rear could be considered.

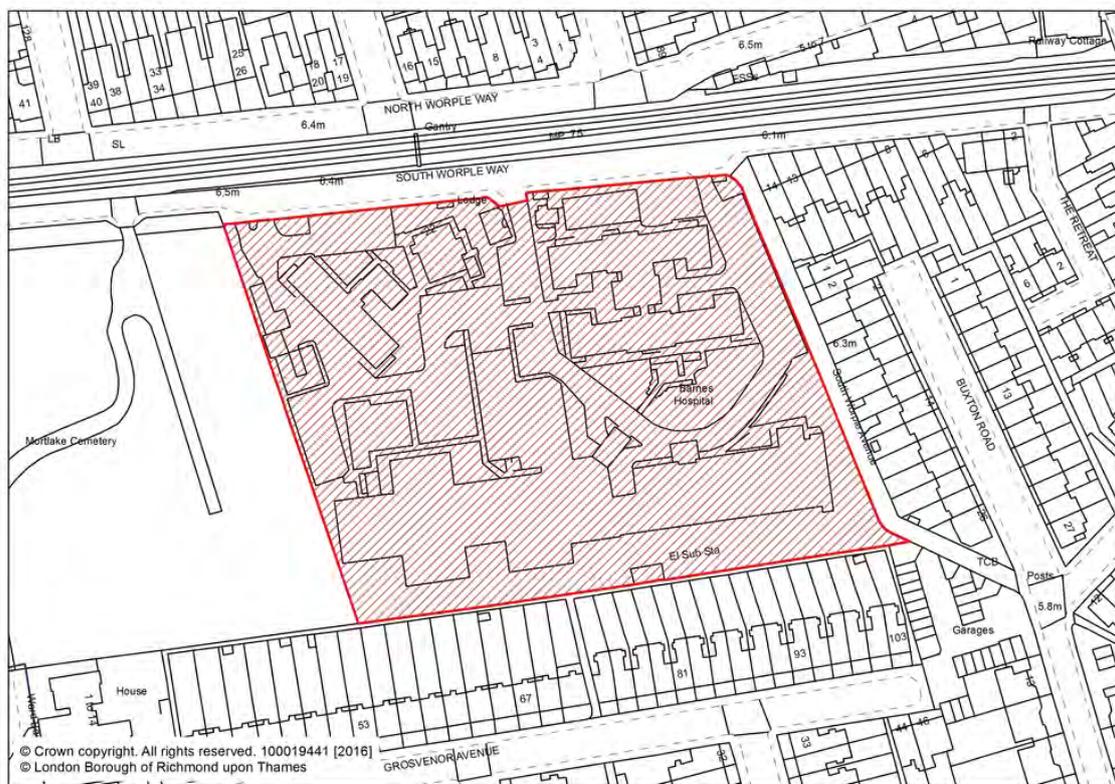
- The majority of the site is within East Sheen's main centre boundary.
- The Telephone Exchange is subject to being declared surplus to requirements by British Telecom.
- 172-176 is in commercial use and opposite to a designated secondary shopping frontage.
- If the Telephone Exchange becomes surplus to requirements, the opportunity should be taken for a comprehensive redevelopment of the whole area.
- As this is a site in one of the borough's main centres, there is an expectation that any proposal provides employment floorspace, particularly B1 offices.
- Any redevelopment proposal should provide for employment or commercial floorspace as well as community and social infrastructure uses. Such provision should create an attractive frontage along Upper Richmond Road West.
- Only if employment and other commercial as well as social infrastructure uses have been explored and options discounted in line with other policies in this Plan, would the provision of housing (including affordable housing) in upper floors and to the rear of the site as part of a mixed use scheme be considered as a potential redevelopment option.
- The Council acknowledges that the area encompasses two different sites in different ownership; however, the Council will expect the landowners to work together to bring forward a scheme that contributes to the vitality and viability of East Sheen centre.
- Design objectives and general guidance relating to the local character of the area, which any redevelopment proposal should have regard to, is also set out in the East Sheen Village Planning Guidance SPD.



## SA 28 Barnes Hospital, East Sheen

If the site is declared surplus to requirements, appropriate land uses include social and community infrastructure uses. Any redevelopment proposal for this site will be required to prioritise the provision of a new Special Education Needs school.

- The site is owned by the South West London and St George's Mental Health NHS Trust.
- It is acknowledged that the mix of uses on this site will depend on the Mental Health Trust's decision on how much of the site they need to retain for their own future needs.
- There is a clear need for a new Special Education Needs school in this area as set out in the Council's updated School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to prioritise the provision of the educational use.
- Appropriate land uses include social and community infrastructure uses (including education). The possibility of locating primary and/or community health services on this site should be investigated.
- Only if community and social infrastructure uses have been explored and options discounted in line with other policies in this Plan, would the provision of housing (including affordable housing) and potential for extra-care housing, be considered as a potential redevelopment option.
- The Council expects that the most important existing Buildings of Townscape Merit are retained. Any proposal should respond positively to the adjoining Queens Road Conservation Area and the relationship with Mortlake cemetery.
- Design objectives and general guidance relating to the local character of the area, which the redevelopment of this site should have regard to, is set out in the East Sheen Village Planning Guidance SPD.



## 13 Implementation

### 13.1 Implementation of the Local Plan

13.1.1 The Local Plan will be implemented and delivered through a combination of private sector investment, the work of other agencies and bodies and the Council's own strategies and initiatives. The majority of new development identified in the Plan's site allocations, particularly investments in new infrastructure, housing and jobs, will be delivered by the private sector. The Infrastructure Delivery Plan and Infrastructure Delivery Schedule (see section 13.2 'Infrastructure Delivery' of this Plan), set out the range of plans, programmes and strategies, including those of partner organisations and agencies. The implementation of the Council's own strategies and plans as well as those of key partner organisations will be essential to the delivery of the Strategic Vision.

13.1.2 In addition, other public bodies and agencies, such as Transport for London, have a key role to play in delivering the required transport improvements that are necessary to accommodate the anticipated growth in the borough and to implement the Spatial Strategy. The community and voluntary sector will play a key role in implementation. The Council will therefore continue to work with all its partners and use all its relevant powers and programmes to ensure that essential infrastructure will be delivered.

13.1.3 At least 3,150 homes will need to be built in the borough during the period of 2015-2025. These new homes will largely be delivered by the private sector in residential-led as well as mixed use schemes. The main locations for new housing across the borough are identified in the Spatial Strategy and the relevant Housing policies of this Plan. Affordable housing will be secured through Planning Obligations, by private developers and Registered Providers (RPs) of affordable housing. The Council will support the delivery of further affordable housing that will be provided by RPs' own schemes. The Council's approach to securing affordable housing through Planning Obligations is set out in its Affordable Housing SPD. Detailed monitoring of the overall housing provision and the delivery of affordable housing takes place as part of the Council's annual Authority's Monitoring Report - visit the [Council's website](http://www.richmond.gov.uk/authority_monitoring_report.htm) for further information at [www.richmond.gov.uk/authority\\_monitoring\\_report.htm](http://www.richmond.gov.uk/authority_monitoring_report.htm). Evidence and needs is also reflected in the Council's Strategic Housing Market Assessment.

13.1.4 The provision of employment space to meet the anticipated growth in the local economy will be delivered by the private sector as part of employment-only or mixed use schemes in locations identified in the Spatial Strategy and Employment policies of this Plan. The provision of flexible, small units to serve the particular needs of the borough's local economy will be secured through Planning Obligations in appropriate locations.

13.1.5 The Spatial Strategy highlights the need for 21,700sqm (gross) of retail floorspace in the borough by 2024. This figure already takes account of past and emerging structural changes within the retail sector, such as the growth in internet shopping. New and additional retail floorspace will be delivered by the private sector as part of mixed use redevelopment schemes within the borough's centres and site allocations as identified in this Plan. In particular, Richmond Station is expected to make a substantial contribution to the identified retail floorspace need of approximately 10,000sqm.

13.1.6 Improvements to transport infrastructure, particularly to public transport as well as cycling and walking, will be essential to the delivery of the Spatial Strategy. The London Plan sets out strategic schemes and proposals for London, a number of which are of relevance to the borough, such as Crossrail 2, London Overground improvements and Southwest Rail ten car capacity. The Council will support improvements to

public transport, including enhanced capacity as well as improved bus and rail services and accessibility opportunities. These improvements will largely be delivered by Government, Transport for London and other public transport operating companies. Funding for improvements will be provided in part through the Community Infrastructure Levy, and where appropriate, developer contributions through Planning Obligations will also be sought from relevant development sites. A detailed list of transport projects and infrastructure requirements is set out in the Council's Infrastructure Delivery Plan and Infrastructure Delivery Schedule (see Section [13.2 'Infrastructure Delivery'](#) of this Plan).

13.1.7 A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population. Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses:

- Richmond upon Thames College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college
- Stag Brewery, Mortlake: provision of a new 6-form of entry secondary school, including sixth form
- Ryde House, East Twickenham: provision of a new 2-form of entry primary school
- Barnes Hospital, Barnes: provision of 2-form of entry primary school

13.1.8 In addition, the Council is undertaking a further review of potential site opportunities for educational uses.

13.1.9 The Council will work with service providers and developers to ensure the adequate provision of community services and facilities, especially in areas where there is an identified need or shortage. New community and social infrastructure facilities are also expected to be delivered on a variety of sites as identified in this Plan. Improvements to open spaces as well as play facilities will be required in line with policy LP 31 in [8.4 'Public Open Space, Play Space, Sport and Recreation'](#). A detailed list of projects and infrastructure requirements in relation to social infrastructure and community uses is set out in the Council's Infrastructure Delivery Plan and Infrastructure Delivery Schedule (see Section [13.2 'Infrastructure Delivery'](#)).

13.1.10 The activities of other key partner agencies and bodies, such as the Richmond Clinical Commissioning Group (CCG) and NHS partner organisations, who are responsible for delivering health services in the borough, will also contribute to delivering the Strategic Vision and Spatial Strategy.

13.1.11 The Local Plan will take into account the work emerging from the NHS South West London Sustainability and Transformation Plan (STP). The STP will tackle the four biggest challenges in health - money, workforce, estates and consistent quality of care - and deliver proactive, preventative care. This work has been jointly carried out by local clinical commissioning groups (CCGs), hospitals, community health services and mental health trusts, with the support of local councils and members of the public.

13.1.12 The community and voluntary sector will be a key partner to deliver services and facilities to meet people's needs as set out in the Spatial Strategy.

13.1.13 The Council, as part of its Uplift programme, will continue to rejuvenate the areas of Whitton, Hampton North, Barnes, Mortlake, Ham, Fulwell and Hampton Hill, which local people say are in need of improvement.

13.1.14 Further information on the infrastructure required to support a growing population and development in this borough is set out in the following section [13.2 'Infrastructure Delivery'](#).

## 13.2 Infrastructure Delivery

### Introduction

13.2.1 Delivery of infrastructure is critical to the delivery of the Strategic Objectives, Vision and Spatial Strategy of the Local Plan. Future development, as set out in this Local Plan, will need to be enabled and supported by the timely delivery of infrastructure. Infrastructure planning ensures that physical and non-physical requirements for an area or development can be delivered in a timely manner. This includes working in partnership with physical, social and green infrastructure providers to establish what infrastructure provision there is in the borough, and identifying any gaps or capacity issues within the existing provision, in order to support sustainable growth in the borough.

13.2.2 The NPPF sets out that planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. In addition, local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. The NPPF in paragraph 162 states that local planning authorities should work with other authorities and providers to:

- assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and
- take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.

### Infrastructure to support sustainable growth

13.2.3 Changes in the population and in particular any population increases and growth as well as changes in needs and demands will influence what community infrastructure is required in the borough. In addition, new development and population growth will require an appropriate level of additional infrastructure to ensure that existing as well as new communities and businesses have the necessary infrastructure, such as school places, health centres and leisure facilities.

13.2.4 To enable sustainable growth in the borough, the infrastructure requirements of new development will need to be established, and the need for any new infrastructure should be planned in conjunction with new development; this includes for example transport or utilities infrastructure requirements.

13.2.5 Planning, through the use of the Community Infrastructure Levy and Planning Obligations, is a prime way that the Council can gain the necessary resources to assist in the delivery of this vital infrastructure.

### Infrastructure Delivery Plan

13.2.6 The Council's Infrastructure Delivery Plan (IDP) is part of the evidence base that has informed the review of the policies contained within this Plan. The IDP provides an infrastructure assessment for the borough and it has direct links with both the Local Plan as well as the Community Plan. For the purpose of the Local Plan and the IDP, 'essential community infrastructure' is defined as 'any physical structure, facility or service, whether privately or publicly funded, that supports or enables growing communities'.

13.2.7 The Community Plan highlights that one of the challenges is the delivery of quality public services within the context of deepening public financial restraints. The Council's IDP supports the production and delivery of the Local Plan as it identifies the future infrastructure and service needs for the borough. More specifically, the IDP:

- provides an analysis of existing infrastructure provision and identifies how well existing needs are met;
- identifies future infrastructure requirements to support new development and a growing population, housing and employment growth
- provides an indication of the potential costs and means and sources of funding the required infrastructure, including public funding, developer contributions and other sources; and
- it provided the basis for setting a well-balanced and reasonable charge for the Community Infrastructure Levy (CIL). The Council's CIL was introduced in November 2014.

13.2.8 The scope of facilities that have been investigated as part of the IDP includes the following:

- Social and community infrastructure including early years education, primary and secondary as well as special needs education, further/higher/adult education, health care (including hospitals and GPs), adult social care, sport facilities including leisure facilities such as sports halls and indoor, community centres, youth centres, libraries, affordable housing as well as arts and culture;
- Emergency services including police, ambulance and fire service;
- Green infrastructure including parks, open spaces, trees and woodlands, allotments, cemeteries and crematoria, play facilities and rivers;
- Utilities and physical infrastructure including electricity, gas, low and zero carbon energy infrastructure, water resources and supply, surface and foul water infrastructure and waste water treatment, flood risk and flood defence infrastructure, waste management and disposal and telecommunications;
- Transport infrastructure including roads and highways, overground and underground railways, buses, cycle facilities, pedestrian facilities, including towpath, river transport (along and across the River Thames), car parking, travel choice, community transport and taxis; and
- Heritage assets.

13.2.9 The IDP therefore ensures that all infrastructure matters necessary for the achievement of Local Plan Vision and Spatial Strategy as well as the policies and site-specific proposals are embraced.

### **Infrastructure Delivery Schedule**

13.2.10 The Local Plan and IDP is supported by the Council's Infrastructure Delivery Schedule (IDS), which sets out the where, what, why, who, and when key infrastructure is required in the borough.

13.2.11 Whilst the IDP provides the baseline for infrastructure required to support the sustainable growth of the borough, the IDS provides a detailed analysis of the specific infrastructure projects, including where a need/future demand has been identified. It identifies the costs of new required infrastructure/facilities as well as sources of funding. In addition, it details whether the infrastructure project will be needed in the short-/medium-/long-term, and whether it will need to be delivered in phases. Where applicable, it identifies and includes the location of new infrastructure. The IDS also identifies the relevant delivery partners and any other critical elements that need to be taken account of to ensure the delivery of the necessary infrastructure.

13.2.12 Both the IDP and IDS provide a snap-shot in time and are based on best available information at the time of their production. Needs and demands for infrastructure can change significantly due to unexpected events, for example the opening of a new school may change the demand for school places in a specific area. In addition, they do not provide a definitive or exhaustive list of available funding sources and infrastructure costs as these can also change significantly within a short period of time. Thus, the IDP and IDS are treated as living documents and are therefore monitored and regularly updated. To access the latest IDP and IDS, visit the [Council's website](http://www.richmond.gov.uk/local_plan) at [www.richmond.gov.uk/local\\_plan](http://www.richmond.gov.uk/local_plan), which is also where future updated editions of the IDP and IDS will be published.

### 13.3 Planning Obligations and Financial Contributions

13.3.1 Planning Obligations under Section 106 of the Town and Country Planning Act 1990 (as amended), commonly known as S106 agreements, are a mechanism which make a development proposal acceptable in planning terms, which would otherwise be unacceptable. The common uses of Planning Obligations are to secure affordable housing and financial contributions to provide infrastructure or affordable housing. However these are not the only uses for a Planning Obligation. It can also

- restrict the development or use of the land in any specified way;
- require specified operations or activities to be carried out in, on, under or over the land;
- require the land to be used in any specified way; or
- require a sum or sums to be paid to the authority on a specified date or dates or periodically.

13.3.2 Planning Obligations will be sought as appropriate to mitigate the impact of development. The following three statutory tests for the use of Planning Obligations will be applied (in line with the Community Infrastructure Levy Regulations 2010 as amended), and it will have to be demonstrated that that the obligation is:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

13.3.3 Therefore, development will be expected to contribute to any additional infrastructure and community needs generated by the development, taking account of the requirements set out in this Plan, the Council's Planning Obligations SPD, Affordable Housing SPD, and the Borough and Mayoral Community Infrastructure Levy. Further details on these documents can be found on the [Council's website](http://www.richmond.gov.uk/local_plan) at [www.richmond.gov.uk/local\\_plan](http://www.richmond.gov.uk/local_plan)

13.3.4 The Community Infrastructure Levy (CIL) will provide the main means of addressing the infrastructure requirements arising out of developments. However, where policies in the Local Plan require consideration of direct assessment for infrastructure provision, such as for transport, utilities and green infrastructure, the impact on existing infrastructure and the infrastructure requirements arising from new development will need to be clearly established within an application. Mechanisms will need to be secured to ensure delivery in conjunction with the timetable expected for development (also see [13.2 'Infrastructure Delivery'](#)).

13.3.5 The Council's CIL will be spent on local strategic infrastructure in accordance with the Council's adopted Community Infrastructure Levy (CIL) Regulation 123 List, and a proportion of the CIL will be allocated for spending in consultation with the local community. In line with the CIL Regulations, the Council is not able to use CIL contributions for affordable housing. This is why affordable housing is secured through Planning Obligations. In addition, Planning Obligations for site-specific mitigation measures that are necessary to make a development acceptable in planning terms will be used alongside the CIL. Other policy requirements allow for a financial contribution, which will need to be secured by a Planning Obligation. It should be noted that Planning Obligation monies will not be secured for projects or items already on the Council's Regulation 123 List, and will be subject to the pooling restrictions as set out in the CIL regulations.

13.3.6 The Council reports annually on Planning Obligation and Council CIL monies received. These are published on the [Council's website](http://www.richmond.gov.uk/local_plan) at [www.richmond.gov.uk/local\\_plan](http://www.richmond.gov.uk/local_plan)

13.3.7 Viability will be taken into account in accordance with section [13.4 'Ensuring viability and deliverability'](#) of this Plan.

## 13.4 Ensuring viability and deliverability

13.4.1 The NPPF at paragraph 173 states 'To ensure viability, the costs of any requirements likely to be applied to the development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.'

13.4.2 The NPPF therefore allows for a profit for the developer, which reflects the risks in developing and funding the scheme.

13.4.3 The NPPF also allows for a 'return' to encourage the land owner to bring the site forward for development. This 'return' or premium is generally dependent on three factors:

1. The planning status of the site and the lawful alternative uses it can be used for
2. The aspirations and needs of the landowner
3. The need of the local authority to see the scheme developed

13.4.4 The NPPG provides further guidance on viability and plan making, and viability and decision taking with regard to site specifics. The guidance states that 'In making decisions, the local planning authority will need to understand the impact of Planning Obligations on the proposal. Where an applicant is able to demonstrate to the satisfaction of the local planning authority that the planning obligation would cause the development to be unviable, the local planning authority should be flexible in seeking Planning Obligations. This is particularly relevant for affordable housing contributions which are often the largest single item sought on housing developments. These contributions should not be sought without regard to individual scheme viability. The financial viability of the individual scheme should be carefully considered in line with the principles in this guidance.' The guidance then continues to set out some general principles on how the key factors of gross development value, costs, land value and the competitive return to developers and land owners should be calculated and evidenced.

13.4.5 As set out in section [13.3 'Planning Obligations and Financial Contributions'](#), the Planning Obligations SPD sets out the Council's policies and procedures for securing site-specific developer contributions alongside the Borough's CIL. Further details regarding affordable housing contributions and viability are set out in policy LP 36 in [9.3 'Affordable Housing'](#) and the Affordable Housing SPD. Recent viability testing for the Borough CIL took account of affordable housing policy requirements and a whole plan viability assessment for the Local Plan Review accompanies this Plan, to continue to ensure policies are underpinned by a broad understanding of viability.

## 13.5 Monitoring

13.5.1 Since the adoption of the Core Strategy and Development Management Plan in 2009 and 2011 respectively, the Council has well-established and up-to-date monitoring systems in place for a range of key planning indicators. These monitor the effectiveness of the policies and strategies over time, including against set targets where appropriate. They are essential to ensure that the objectives and ultimately the Spatial Strategy and Strategic Vision are being delivered.

13.5.2 Indicators for the Council's Core Strategy originally derived from the accompanying Sustainability Appraisal and were set out against each policy area. Additional indicators and targets where appropriate were added to the monitoring framework following the adoption of the Development Management Plan.

13.5.3 Indicators, and where required targets, are reviewed regularly and where necessary have been amended to ensure the monitoring framework reflects national and regional requirements, and to ensure that the adopted policies continue to be monitored in the most meaningful way.

13.5.4 Key aspects of monitoring continues to be undertaken on an annual basis and is reported as part of the Authority's Monitoring Reports. The data collected as part of the preparation of the Monitoring Reports also feed into monitoring systems set up by the Greater London Authority (i.e. the London Development Database).

13.5.5 The monitoring framework will be revised to reflect the adoption of the new Local Plan policies. This revised monitoring framework will be informed by the Sustainability Appraisal process.

13.5.6 Note that existing indicators, and where applicable targets, in relation to the Twickenham Area Action Plan will not be amended as part of this Local Plan Review.

[New para] It is recognised that over the lifetime of the Plan, external circumstances will change. Whilst the Plan is overall considered to be flexible, the NPPF allows for Local Plans to be reviewed in whole or in part to respond flexibly to changing circumstances. Therefore, external factors such as changes in national policy, a London Plan review or changes in local evidence and need may trigger a review of this Local Plan. The programme for the preparation of Development Plan Documents is set out within the Council's Local Development Scheme, which is regularly reviewed and updated.

## 14 Appendix 1 - List of all Local Plan policies

14.0.1 This Appendix provides a summary of all new policies contained within this Local Plan.

### Policies

- Policy LP 1 Local Character and Design Quality
- Policy LP 2 Building Heights
- Policy LP 3 Designated Heritage Assets
- Policy LP 4 Non-Designated Heritage Assets
- Policy LP 5 Views and Vistas
- Policy LP 6 Royal Botanic Gardens, Kew World Heritage Site
- Policy LP 7 Archaeology
- Policy LP 8 Amenity and Living Conditions
- Policy LP 9 Floodlighting
- Policy LP 10 Local Environmental Impacts, Pollution and Land Contamination
- Policy LP 11 Subterranean developments and basements
- Policy LP 12 Green Infrastructure
- Policy LP 13 Green Belt, Metropolitan Open Land and Local Green Space
- Policy LP 14 Other Open Land of Townscape Importance
- Policy LP 15 Biodiversity
- Policy LP 16 Trees, Woodlands and Landscape
- Policy LP 17 Green Roofs and Walls
- Policy LP 18 River corridors
- Policy LP 19 Moorings and Floating Structures
- Policy LP 20 Climate Change Adaptation
- Policy LP 21 Flood Risk and Sustainable Drainage
- Policy LP 22 Sustainable Design and Construction
- Policy LP 23 Water Resources and Infrastructure
- Policy LP 24 Waste Management
- Policy LP 25 Development in centres
- Policy LP 26 Retail Frontages
- Policy LP 27 Local Shops, Services and Public Houses
- Policy LP 28 Social and Community Infrastructure
- Policy LP 29 Education and Training
- Policy LP 30 Health and Wellbeing
- Policy LP 31 Public Open Space, Play Space, Sport and Recreation
- Policy LP 32 Allotments and food growing spaces
- Policy LP 33 Telecommunications
- Policy LP 34 New Housing
- Policy LP 35 Housing Mix and Standards
- Policy LP 36 Affordable Housing
- Policy LP 37 Housing Needs of Different Groups
- Policy LP 38 Loss of Housing
- Policy LP 39 Infill, Backland and Backgarden Development
- Policy LP 40 Employment and local economy
- Policy LP 41 Offices
- Policy LP 42 Industrial Land and Business Parks
- Policy LP 43 Visitor Economy
- Policy LP 44 Sustainable Travel Choices
- Policy LP 45 Parking standards and servicing

## Site Allocations

- SA 1 Hampton Square, Hampton
- SA 2 Platts Eyot, Hampton
- SA 3 Hampton Traffic Unit, 60-68 Station Road, Hampton
- SA 4 Hampton Delivery Office, Rosehill, Hampton
- SA 5 Telephone Exchange, Teddington
- SA 6 Teddington Delivery Office, Teddington
- SA 7 Strathmore Centre, Strathmore Road, Teddington
- SA 8 St Mary's University, Strawberry Hill
- SA 9 Richmond upon Thames College, Twickenham
- SA 10 The Stoop (Harlequins Rugby Football Club), Twickenham
- SA 11 Twickenham Stadium, Twickenham
- SA 12 Mereway Day Centre, Mereway Road, Twickenham
- SA 13 Telephone Exchange, Whitton
- SA 14 Kneller Hall, Whitton
- SA 15 Ham Close, Ham
- SA 16 Cassel Hospital, Ham Common, Ham
- SA 17 St Michael's Convent, Ham Common, including new OOLTI designation
- SA 18 Ryde House, East Twickenham
- SA 19 Richmond Station, Richmond
- SA 20 Friars Lane Car Park, Richmond
- SA 21 Sainsbury's, Lower Richmond Road, Richmond
- SA 22 Pools on the Park and surroundings, Old Deer Park, Richmond
- SA 23 Richmond Athletic Association Ground, Old Deer Park, Richmond
- SA 24 Stag Brewery, Lower Richmond Road, Mortlake
- SA 25 Mortlake and Barnes Delivery Office, Mortlake
- SA 26 Kew Biothane Plant, Mellis Avenue, Kew
- SA 27 Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen
- SA 28 Barnes Hospital, East Sheen

## 15 Appendix 2 - Policies to be superseded

### Core Strategy policies to be superseded by the Local Plan

- CP1 Sustainable Development
- CP2 Reducing Carbon Emissions
- CP3 Climate Change - Adapting to the Effects
- CP4 Biodiversity
- CP5 Sustainable Travel
- *CP6 Waste (this has already been superseded by the West London Waste Plan)*
- CP7 Maintaining and Improving the Local Environment
- CP8 Town and Local Centres
- CP9 Twickenham Town Centre
- CP10 Open Land and Parks
- CP11 River Thames Corridor
- CP12 River Crane Corridor
- CP13 Opportunities for All (Tackling Relative Disadvantage)
- CP14 Housing
- CP15 Affordable Housing
- CP16 Local Services/Infrastructure
- CP17 Health and Well-being
- CP18 Education and Training
- CP19 Local Business
- CP20 Visitors and Tourism

### Development Management policies to be superseded by the Local Plan

- Policy DM SD 1 Sustainable Construction
- Policy DM SD 2 Renewable Energy and Decentralised Energy Networks
- Policy DM SD 3 Retrofitting
- Policy DM SD 4 Adapting to Higher Temperatures and Need for Cooling
- Policy DM SD 5 Living Roofs
- Policy DM SD 6 Flood Risk
- Policy DM SD 7 Sustainable Drainage
- Policy DM SD 8 Flood Defences
- Policy DM SD 9 Protecting Water Resources and Infrastructure
- Policy DM SD 10 Water and Sewerage Provision
- Policy DM OS 1 Major Developed Site in the Green Belt
- Policy DM OS 2 Metropolitan Open Land
- Policy DM OS 3 Other Open Land of Townscape Importance
- Policy DM OS 4 Historic Parks, Gardens and Landscapes
- Policy DM OS 5 Biodiversity and new development
- Policy DM OS 6 Public Open Space
- Policy DM OS 7 Children's and Young People's Play Facilities
- Policy DM OS 8 Sport and Recreation Facilities
- Policy DM OS 9 Floodlighting
- Policy DM OS 10 Allotments and other food growing spaces
- Policy DM OS 11 Thames Policy Area
- Policy DM OS 12 Riverside Uses
- Policy DM OS 13 Moorings and Floating Structures
- Policy DM TC 1 Larger Town Centres
- Policy DM TC 2 Local and Neighbourhood Centres and Areas of Mixed Use
- Policy DM TC 3 Retail Frontages
- Policy DM TC 4 Local Shops, Services and Public Houses
- Policy DM TC 5 The Evening Economy

- Policy DM HD 1 Conservation Areas - designation, protection and enhancement
- Policy DM HD 2 Conservation of listed buildings and Scheduled Ancient Monuments
- Policy DM HD 3 Buildings of Townscape Merit
- Policy DM HD 4 Archaeological Sites
- Policy DM HD 5 World Heritage Site
- Policy DM HD 6 War Memorials
- Policy DM HD 7 Views and Vistas
- Policy DM HO 1 Existing Housing (including conversions, reversions and non self-contained accommodation)
- Policy DM HO 2 Infill Development
- Policy DM HO 3 Backland Development
- Policy DM HO 4 Housing Mix and Standards
- Policy DM HO 5 Housing to Meet Specific Community Needs
- Policy DM HO 6 Delivering Affordable Housing
- Policy DM SI 1 Encouraging New Social Infrastructure Provision
- Policy DM SI 2 Loss of Existing Social Infrastructure Provision
- Policy DM EM 1 Development for Offices, Industrial, Storage and Distribution uses
- Policy DM EM 2 Retention of Employment
- Policy DM TP 1 Matching Development to Transport Capacity
- Policy DM TP 2 Transport and New Development
- Policy DM TP 3 Enhancing Transport Links
- Policy DM TP 4 Integration of different types of Transport and Interchange Facilities
- Policy DM TP 5 Taxis and Private Hire Vehicles
- Policy DM TP 6 Walking and the Pedestrian Environment
- Policy DM TP 7 Cycling
- Policy DM TP 8 Off Street Parking - Retention and New Provision
- Policy DM TP 9 Forecourt Parking
- Policy DM DC 1 Design Quality
- Policy DM DC 2 Layout and Design of Mixed Use Schemes
- Policy DM DC 3 Taller Buildings
- Policy DM DC 4 Trees and Landscape
- Policy DM DC 5 Neighbourliness, Sunlighting and Daylighting
- Policy DM DC 6 Balconies and Upper Floor Terraces
- Policy DM DC 7 Shop fronts and shop signs
- Policy DM DC 8 Advertisements and Hoardings
- Policy DM DC 9 Planning Application Checklist

### **Saved Unitary Development Plan proposal sites to be superseded by the Local Plan**

- B1 Westfields School: use of playground out of school hours
- B2 Barnes Station and former goods yard: car park, public open space, possible enabling development
- B4 Mill Hill/Rocks Lane: junction improvement & highway maintenance
- B5 Barn Elms Sports Ground: rationalisation of sports use including provision of public indoor sports hall & upgrading sports pitches, enhancement of landscape
- B6 Beverley Brook: pedestrian access to Richmond Park
- S1 East Sheen Primary School, Upper Richmond Road West: use of playground out of school hours
- S2 Sheen Mount Primary School: use of playground out of school hours
- S3 Holy Trinity C of E Primary School, Carrington Road: use of playground out of school hours
- S4 Budweiser Stag Brewery: conversion and part redevelopment
- S5 Post Office Sorting Office/Signal House/Public House: reducing width of High Street, bringing forward of building line
- S6 Mortlake Station: interchange improvements
- S7 North Sheen Station: interchange improvements
- P1 Meadlands School: use of playground out of school hours

- P3 Grey Court School: improvement of school premises, increased public use of school facilities including school hall
- P4 King George's Pavilion: housing/employment/community use.
- H1 Land and Buildings at Hampton Water Treatment Works: Conversion of redundant Thames Water buildings for business, residential and other compatible uses together with re-use of the associated filter beds and surrounding land.
- H2 Sunnyside Reservoir, Lower Sunbury Road: use for water-based sport, recreational uses.
- H3 Hydes Field, Upper Sunbury Road: short stay camping and caravanning
- H5 Hampton Station: interchange improvements
- H6 North end of Oak Avenue, Hampton: recreation use
- H7 Open space, north end of Oak Avenue: bridle path
- H8 Buckingham JM/I School: increased community use
- H9 Beveree, Beaver Close: children's playground
- H10 Hampton Infants School, Ripley Road: use of playground out of school hours
- H11 Hampton Junior School, Percy Road: school extension, use of playground out of school hours
- H14 Hatherop Recreation Ground: public open space improvement
- H15 Platts Eyot, Lower Sunbury Road: mixed use development suitable uses include business or industrial (B1 or B2), leisure and residential.
- H16 Church Street/High Street: road closure, environmental improvement
- H17 Church Street: reduction in carriageway width
- H18 Station Road/Ormond Avenue/Tudor Road/Oldfield Road: junction improvement
- H19 High Street/Thames Street: junction improvement
- H20 Thames Street/Church Street: traffic signals
- H21 Hampton Court Road/Chestnut Avenue: junction realignment and improvement
- H22 Fulwell Bus Garage/BR Station: interchange improvements
- H23 Hampton Water Works: Operational water works development.
- H24 Former Council Depot, Oldfield Road: Housing
- K3 Queens C of E Primary Schools: use of playground out of school hours
- K4 Kew Gardens Station: interchange improvements
- R1 George Street: improved conditions for pedestrian, feasibility of pedestrianisation
- R2 The Quadrant: service road extension and other uses
- R4 Friars Lane car park: Housing
- R6 Richmond Station and air track rights: transport inter-change, railtrack concourse, comprehensive retail/ business use/community/entertainment/residential/ parking
- R7 Land at rear of 10 Kings Road: housing
- R8 Pools on the Park: intensification of sports use
- R9 New Vineyard School: use of playground out of schools hours
- R11 Terrace Yard, Petersham Road: Housing
- D1 Normansfield: institution use/hotel/training centre, leisure, open space, nature conservation, housing
- D2 Hampton Wick Station: station redevelopment, business use
- D3 Teddington Library: library extension
- D4 Teddington Station: station car park and environmental improvements
- D5 Queens Road Clinic: rebuild clinic to modern day standards to include GP surgery.
- D6 The Causeway, Teddington: pedestrian enhancement
- D7 Former playingfield, School House Lane: children's playground
- D9 Sacred Heart RC Primary School: use of playground out of school hours
- D10 St John the Baptist C of E School: possible extension of school, use of playground out of school hours
- D11 Stanley Primary Schools: use of playground out of school hours
- D12 Teddington School/Broom Road Recreation Ground: Rebuild school, increased public use of school facilities including sports hall and all weather pitches and joint public/school use of recreation ground.
- D13 From Kingston Bridge, via Bushy Park, Hampton Hill, Fulwell Golf Course and Crane Park towards Hounslow Heath: London Loop Outer Orbital Walking Route.
- T2 Stable block, Orleans House: art gallery extension, local studies museum
- T4 Oak Lane Cemetery: public open space

- T7 Waldegrave School: extension and improvement to school premises, increased public use of school facilities
- T8 Archdeacon Cambridge C of E Primary Schools: use of playground out of school hours
- T9 Trafalgar Primary Schools, Elmsleigh Road: use of playground out of school hours
- T10 St James' RC Primary School: use of playing fields out of school hours
- T12 Orleans Park School: increased public use of school facilities including sports hall and playing fields
- T13 Meadway: use of playground out of school hours
- T14 Craneford Way Depot: depot facilities/ residential use
- T16 Fountain Public House: hotel
- T18 Marble Hill Park: landscaping improvements
- T19 Chertsey Road/London Road: junction improvement
- T20 Whitton Road/Rugby Road: roundabout improvement
- T21 St Margarets Road/Richmond Road/Rosslyn Road: junction improvement
- T22 Chertsey Road/Hospital Bridge Road: junction improvement
- T24 Brunel University College, Twickenham: redevelopment for a mixed use scheme, including housing, some community/ education/ employment use, retention of listed buildings and some open areas, improved links through site.
- T25 St Margarets Station: interchange improvements
- T26 Strawberry Hill Station: interchange improvements
- T27 St Mary's Junior C of E School Rear of Orleans Park School: use of playground out of school hours.
- T28 Harlequins Rugby Ground: Continued use as sports ground with associated facilities, enabling development, new access road.
- T29 Redevelopment to provide college & enabling residential development. Retention & upgrading of Craneford Way East Playing Field.
- W2 Chase Bridge Primary School: possible extension of schools, use of playground out of school hours
- W3 Nelson Primary School: school rebuilding, affordable housing, use of playground out of school hours
- W4 St Edmunds RC Primary School: use of playground out of school hours
- W5 Bishop Perrin's C of E Primary School: use of playground out of school hours
- W6 Hospital Bridge Road north of Montrose Avenue: highway widening
- W7 Hanworth Road: railway bridge reconstruction with footways
- W8 Powder Mill Lane: heavy goods vehicles restriction
- W9 Whitton School: increased public use of school facilities and playing fields
- W10 High Street: environmental improvements
- W11 A316 near Hospital Bridge Road: footbridge extensions
- W12 Hanworth Road/Powdermill Lane: junction improvement
- W14 Whitton Station: interchange improvements
- W15 Heathfield Schools & Heathfield Rec (part): Rebuild existing schools and add new secondary school

## 16 Appendix 3 - Parking Standards

LAND USE	PARKING STANDARD	CYCLE PARKING STANDARD
USE CLASS A1- SHOPS	Servicing for shops outside town and district centres to be off street	
General Retail	As per <a href="#">London Plan</a>	As per <a href="#">London Plan</a>
Superstores	As per <a href="#">London Plan</a>	As per <a href="#">London Plan</a>
NON FOOD RETAIL WAREHOUSES	As per <a href="#">London Plan</a>	As per <a href="#">London Plan</a>
USE CLASS A2-A4	As per <a href="#">London Plan</a>	As per <a href="#">London Plan</a>
USE CLASS A5	As per <a href="#">London Plan</a> for parking; delivery vehicles/motorcycles/scooters if proposed must be provided for off street within the site.	As per <a href="#">London Plan</a>
USE CLASS B1- BUSINESS	As per <a href="#">London Plan</a> . Servicing to be provided off street unless in town or district centre	As per <a href="#">London Plan</a>
USE CLASS B2	As per <a href="#">London Plan</a>	As per <a href="#">London Plan</a>
GENERAL/SPECIAL INDUSTRIAL	Parking and servicing requirement to be demonstrated and provided off street but not below <a href="#">London Plan</a> maximum	As per <a href="#">London Plan</a>
USE CLASS B8	As per <a href="#">London Plan</a> . Servicing to be provided off street	As per <a href="#">London Plan</a>
USE CLASS C1		
Hotels	As per <a href="#">London Plan</a> although locality and on-street parking conditions will need to be assessed including parking stress surveys if appropriate. Servicing and coach parking to be provided off street.	As per <a href="#">London Plan</a>
Residential Hostels	Depending on type of hostel, assessed on individual circumstances	As per <a href="#">London Plan</a>
USE CLASS C2	As per <a href="#">London Plan</a>	As per <a href="#">London Plan</a>
	In CPZs occupiers of new residential developments will not be eligible for on-street parking permits where existing levels of on-street parking are very high (Blue Badge holders exempt). Garages will be treated as parking spaces.	
STANDARD		

LAND USE	PARKING STANDARD	CYCLE PARKING STANDARD
RESIDENTIAL (including conversion/extension of existing)		
	PTALs 0-3: 1- 2 bedrooms, 1 space	As per <a href="#">London Plan</a>
	PTALs 0-3: 3+ bedrooms, 2 spaces	As per <a href="#">London Plan</a>
	PTALs 4-6: as per <a href="#">London Plan</a> although local circumstances, CPZ times and on-street parking conditions will need to be assessed.	As per <a href="#">London Plan</a>
RETIREMENT HOUSING	Case by case basis but expected to meet standards for standard residential	As per <a href="#">London Plan</a>
SHELTERED HOUSING	Case by case basis, the future tenure and age of prospective occupants to be taken into account.	As per <a href="#">London Plan</a>
REGISTERED PROVIDER		
	PTALs 0-3: 1 space per dwelling, unassigned	As per <a href="#">London Plan</a>
	PTALs 4-6: as per C3	
USE CLASS D1		
Non Residential Institutions	Each application will be judged on its merits	As per <a href="#">London Plan</a>
Clinics, Health Centres, Dentists/Doctors Surgeries	PTALs 0-3: 1 space per consulting room PTALs 4-6: case by case basis	As per <a href="#">London Plan</a>
Parent and toddler groups Play groups and day nurseries	PTALs 0-3: 1 per 2 staff PTALs 4-6: case by case basis	As per <a href="#">London Plan</a>
Public Halls	1 space per 10 persons/seats. 1 coach space per 50 persons/seats. Off street servicing.	As per <a href="#">London Plan</a>
Places of Worship	1 space per 10 persons/seats	As per <a href="#">London Plan</a>
Schools	1 space per 2 staff. Arrangements must also be made for visitor and disabled parking spaces as per London Plan. Facilities for the setting down of coaches off street required.	As per <a href="#">London Plan</a>
USE CLASS D2 ASSEMBLY AND LEISURE		

<b>LAND USE</b>	<b>PARKING STANDARD</b>	<b>CYCLE PARKING STANDARD</b>
Places of entertainment, Theatres, Cinemas, Bingo Clubs, Dance Halls	1 space per 5 persons	As per <a href="#">London Plan</a>
Conference Centres, exhibition halls	1 space per 5 persons ,1 coach space per 150 seats	As per <a href="#">London Plan</a>
Sports and Leisure Complexes	1 space per 25 sq m, parking facilities for coaches, off street servicing and drop off area	As per <a href="#">London Plan</a>
OTHER USES	Case by case basis	As per <a href="#">London Plan</a> where available

## 17 Appendix 4 - List of Key and Secondary Shopping Frontages

Key Frontage	Secondary Frontage
<b>ASHBURNHAM ROAD</b>	
<b>Ashburnham Road</b> Nos. 171-185 (odd)	
<b>BARNES</b>	
<b>Barnes High Street</b> Nos. 3- 25 (consecutive) Nos. 51-64 (consecutive) <b>Church Road</b> Nos. 125-145 (odd) Nos. 54-102 (even) Nos. 49-85 (odd)	<b>Barnes High Street</b> Nos. 1,1a,1b,1c,2, (consecutive) Nos. 65-69 (consecutive) Nos. 33-36a (consecutive) <b>Church Road</b> Nos. 145a-175 (odd) <b>Rocks Lane</b> Nos. 1-9
<b>CASTELNAU</b>	
<b>Castelnau</b> Nos.174-202 (even) Nos.185-201 (odd)	
<b>EAST SHEEN</b>	
<b>Sheen Lane</b> Nos. 137-141 (odd) Parkway House <b>Upper Richmond Road West</b> Nos. 220-254 (even) Nos. 256-296 (even) Nos. 341-361 (odd) Nos. 363-445 (odd)	<b>Sheen Lane</b> Nos. 105-135 (odd) Nos. 28-40 (even) Nos. 31-63 (odd) Nos. 65A-77 (odd) <b>Upper Richmond Road West</b> Nos. 184-218 (even) Nos. 215-339 (odd) Nos. 298-318 (even) Nos. 447-501 (odd) Nos. 1- 10 Grand Parade (consecutive)
<b>EAST TWICKENHAM</b>	
<b>Richmond Road</b> Nos. 344-380 (even)	<b>Richmond Road</b> Nos. 359-387 (odd) Nos. 417-447 (odd) not including 439 Nos. 332-342 (even) Nos. 382-428 (even)
<b>FRIARS STILE ROAD</b>	
<b>Friars Stile Road</b> Nos. 19-23A (odd) Nos. 36-56 (even)	
<b>FULWELL</b>	
<b>Hampton Road</b> Nos. 206-224 (even)	

Key Frontage	Secondary Frontage
<b>HAM STREET / BACK LANE</b>	
<b>Ashburnham Road</b> Nos. 2-16 (even) <b>Ham Street</b> Nos. 63-71 (odd)	<b>Back Lane</b> Nos. 4-14 (even)
<b>HAM PARADE</b>	
<b>Upper Ham Road</b> Parkleys Parade 1-6 (consecutive) Nos. 21-31 (odd) <b>Richmond Road</b> Nos. 299-323 (odd) Nos. 414-432 (even)	<b>Richmond Road</b> Nos. 406-414a (even)
<b>HAMPTON HILL</b>	
<b>High Street</b> Nos. 50-78 (even) Nos. 169-183 (odd)	<b>High Street</b> Nos. 73-83;101-111;131-143 Nos. 185-201; 203-217(odd) Nos. 10-48; 118a-118e Nos. 120-122 (even)
<b>HAMPTON NURSERY LANDS</b>	
<b>Tangley Park Road</b> Nos. 26-30 (consecutive)	
<b>HAMPTON VILLAGE</b>	
<b>Milton Road</b> Nos. 70-76 (even)  <b>Station Road</b> Nos. 70-82 (even) Nos. 92-100 (even)  <b>Station Approach</b> Nos. 1-3 (consecutive)  <b>Wensleydale Road</b> Nos. 1-13 (odd)  <b>Priory Road</b> Nos. 33-41 (odd)	<b>Milton Road</b> Nos. 78-82 (even)  <b>Ashley Road</b> Nos. 27-37 (odd) <b>Station Approach</b> Nos. 4-9 <b>Oldfield Road</b> Nos. 55-63 (odd) <b>Percy Road</b> No. 31
<b>HAMPTON WICK</b>	
<b>High Street</b> Nos.32-48 (even) No. 56-58 (even)	
<b>HEATHSIDE</b>	
<b>Powder Mill Lane</b> Nos.222-226 (even) Nos.221-247 (odd)	<b>Hanworth Road</b> Nos.646-670 (even)

Key Frontage	Secondary Frontage
<b>HOSPITAL BRIDGE ROAD</b>	
<b>Staines Road</b> Nos.326-336 (even)	
<b>KEW GARDENS STATION</b>	
<b>Station Approach</b> Nos. 1-9 (consecutive) <b>Station Parade</b> Nos. 1-17 (odd) Nos. 2-18 (even)	<b>North Road</b> Nos. 102-109 (consecutive) <b>Royal Parade</b> Nos. 1-9 (consecutive)
<b>KEW GREEN</b>	
<b>Mortlake Terrace</b> Nos. 1-9 (consecutive)	
<b>KEW ROAD</b>	
	<b>Kew Road</b> Nos. 101-145 (odd) Nos. 84-112 (even)
<b>KINGSTON ROAD</b>	
<b>Kingston Road</b> Nos. 149-161 (odd) Nos. 190-208 (even)	<b>Kingston Road</b> Nos. 210-216 (even) <b>Bushy Park Road</b> Nos. 1-5 The Pavement (consecutive)
<b>LOWER MORTLAKE ROAD</b>	
<b>Lower Mortlake Road</b> Nos. 203-223 (odd)	<b>Lower Mortlake Road</b> Nos. 225-231 (odd)
<b>NELSON ROAD</b>	
<b>Nelson Road</b> Nos.300-310 (even) Nos.314-322 (even)	
<b>RICHMOND MAIN CENTRE</b>	
<b>Brewers Lane</b> Nos. 2-18 (even) Nos. 3-13 (odd) <b>Bridge Street</b> Nos. 1-2 (consecutive) <b>Dome Buildings</b> Nos. 1-6 (consecutive) <b>George Street</b> Nos. 1-84 (consecutive) <b>Lower George Street</b> Nos. 1-8 (consecutive) <b>Church Court</b> Nos. 1-6 (even) <b>Golden Court Parade</b>	<b>Duke Street</b> Nos. 1-6 (consecutive) No. 8 <b>Eton Street</b> Nos. 1-3 (odd) Nos. 2-18 (even) <b>Hill Rise</b> Nos. 1-17 (odd) <b>Kew Road</b> Nos.1-61 (odd) <b>Petersham Road</b> Nos. 1-13 (odd) <b>The Quadrant</b> Nos. 19-32 (consecutive)

Key Frontage	Secondary Frontage
<p>Nos. 1-9 (odd) premises adj. to 27-28 The Green &amp; fronting Golden Court</p> <p><b>The Green</b> Nos. 13, 26-29 (consecutive)</p> <p><b>Hill Rise</b> Nos. 2-32 (even) Nos. 40-86 (even)</p> <p><b>Hill Street</b> Nos. 1-23 (odd) Nos. 2-74 (even)</p> <p><b>King Street</b> Nos. 4-16 (consecutive) Nos. 19-19a, 20-26 (consecutive)</p> <p><b>Lichfield Court Parade, Sheen Road</b> Nos. 1-16 (consecutive)</p> <p><b>The Passage</b></p> <p><b>Paved Court</b> Nos. 2-16 (even) Nos. 1-17 (odd)</p> <p><b>The Quadrant</b> Nos. 1-18 (consecutive) Nos. 33-50 (consecutive)</p> <p><b>Red Lion Street</b> Nos. 1-3 (odd) Nos. 2-4(even)</p> <p><b>Sheen Road</b> Nos. 1-13 (odd) Nos. 2-4 (even)</p> <p><b>The Square</b> Nos. 1-4 (consecutive) Former public convenience</p>	<p><b>Richmond Hill</b> Nos. 6-26 (even)</p> <p><b>Red Lion Street</b> Nos. 10-32 (even)</p> <p><b>Sheen Road</b> Nos. 15-21 (odd)</p> <p><b>Westminster House</b> Nos. 1-7 (consecutive)</p>
<b>ST MARGARETS</b>	
<p><b>Crown Road</b> Nos. 2-24 (even)</p> <p><b>St. Margarets Road</b> Nos. 125-155 (odd) Nos. 109-119 (odd)</p>	<p><b>Amyand Park Road</b> Nos. 208, 210</p> <p><b>Crown Road</b> Nos. 26-32 (even) Nos. 35-43 (odd) Nos. 34-48 (even)</p> <p><b>St Margarets Road</b> No. 123 Station Kiosks Nos. 116-126A (even) Nos. 157-165 (odd)</p>
<b>ST MARGARETS ROAD (parade to the north of A316)</b>	
	<p><b>St Margarets Road</b> Nos. 379-391 (odd)</p>
<b>SANDYCOMBE ROAD</b>	
<b>Sandycombe Road</b>	<b>Sandycombe Road</b>

Key Frontage	Secondary Frontage
Nos. 293-303 (odd)	Nos. 296-308 (even)
<b>SHEEN ROAD</b>	
<b>Sheen Road</b> Nos. 106-124 (even)	<b>Sheen Road</b> Nos. 80-94
<b>STANLEY ROAD</b>	
<b>Stanley Road</b> Nos. 176-184 (even) Nos. 91-121 (odd)	<b>Stanley Road</b> Nos. 186-192 (even) Nos. 139-147 (odd)
<b>STRAWBERRY HILL</b>	
<b>Tower Road</b> Nos.50-56 (even) Nos.70-74 (even) Nos.39-45 (odd)  <b>Wellesley Parade</b> Nos.1-6 (consecutive)	
<b>TEDDINGTON</b>	
<b>Broad Street</b> Nos. 17-67 (odd) Nos. 8-72 (even) <b>High Street</b> Nos. 6-42 (even) Nos. 70-98 (even) Nos. 19-67 (odd) Nos. 73-121 (odd)  <b>Station Road</b> No. 1	<b>Broad Street</b> Nos. 1-15 (odd) [including Oval Court] Nos. 2-6 (even) Nos. 74-86 (even)  <b>Church Road</b> Nos. 1-13 (odd) Nos. 6-16 (even) <b>High Street</b> Nos. 100-160 (even) <b>The Causeway</b> Nos. 2-28 (even) Nos. 1-13 (odd)
<b>TWICKENHAM GREEN</b>	
<b>Staines Road</b> Nos. 8-38a (even)	
<b>TWICKENHAM</b>	
<b>Church Street</b> Nos. 9-28 (consecutive) Nos. 31-58 (consecutive) <b>Heath Road</b> Nos. 2-44 (even) <b>King Street</b> Nos. 1-39 (odd) Nos. 2-62 (even) <b>London Road</b> Nos. 1-9 (odd) Nos. 2-50 (even) <b>York Street</b>	<b>Heath Road</b> Nos. 46-164 (even) Nos. 1-85 (odd) Nos. 149-157 (odd) <b>King Street</b> Nos. 41-59 (odd) <b>London Road</b> Nos. 11-65 (odd) <b>York Street</b> Nos. 4-18 (even)

Key Frontage	Secondary Frontage
Nos. 1-19 (odd) No. 2	
<b>WALDEGRAVE ROAD</b>	
<b>Waldegrave Road</b> Nos. 150-158 (even) Nos. 197-207 (odd)	<b>Waldegrave Road</b> No. 189-195 (odd)
<b>WHITE HART LANE</b>	
<b>White Hart Lane</b> Nos. 36-78 (even) Nos. 147-153 (odd)	<b>The Broadway</b> Nos. 1-10 (consecutive) <b>White Hart Lane</b> Nos. 1-7 (odd) <b>Upper Richmond Road West</b> Nos. 42-48 (even)
<b>WHITTON</b>	
<b>High Street</b> Nos. 24-58 (even) Nos. 60-106 (even) Nos. 37-103 (odd)	<b>High Street</b> Nos. 1-35 (including 35a) (odd) Nos. 105-113 (odd) Nos. 115-123 (odd) Nos. 16-22 (even) Nos. 108-114 (even) Nos. 120-136 (even) <b>Bridge Way</b> Bridge Way House <b>Nelson Road</b> Nos. 109-121 (odd)
<b>WHITTON ROAD</b>	
<b>Whitton Road</b> Nos. 97-105 (odd)	

## 18 Appendix 5 - Marketing Requirements

18.0.1 A number of policies in this Local Plan require marketing evidence to be submitted for applications involving the loss of certain uses in order to provide justification that those sites are no longer required for their existing uses, including:

- Policy LP 26 in 7.2 'Retail Frontages'
- Policy LP 27 in 7.3 'Local Shops, Services and Public Houses'
- Policy LP 28 in 8.1 'Social and Community Infrastructure'
- Policy LP 41 in 10.2 'Offices'
- Policy LP 42 in 10.3 'Industrial Land and Business Parks'

18.0.2 This appendix sets out the details that should be provided to enable officers to assess the acceptability or otherwise of the marketing undertaken. The Council's assessment will consider the overall length, type and quality of the marketing to come to a view, and if the applicant/agent puts forward any justification for any shortcomings in the marketing (e.g. the use of only one specialist website rather than a range of generic websites due to the nature of the existing employment use, or that a marketing board was not used because of advertisement controls) these will be considered, however the expectation is the below requirements should be fully addressed.

18.0.3 Marketing should always involve a robust and active marketing campaign and should:

- Be ongoing for a minimum period of two continuous years.
- Be through a commercial agent.
- The property should be marketed on property databases, search engines and other relevant websites which focus on the sale or letting of commercial premises, which are free to view and easily accessible by prospective purchasers / tenants.
- Prices should be commensurate with the existing quality and location of the premises.

18.0.4 A marketing report must be submitted and include the following details:

- Identify the last occupier including name, address, nature of business and floorspace. If the land / buildings are vacant, state the date they were last occupied.
- The date when marketing began and ceased (if relevant) for each agent, if more than one used.
- It should be clearly stated which land uses the property/site is being marketed for, identifying the dates of marketing for each land use.
- Identify the agents used for marketing and a copy of the agents particulars, including any amended particulars to be supplied.
- Details of the price the site has been marketed at and whether the price was reduced, stating the date that it was reduced if this was the case. Marketing should always be at a price that genuinely reflects the market value of the property in its current use and current quality.
- Details of the marketing methods used must be provided. The report should include:
  - The marketing particulars.
  - Which websites or press the property/site was advertised on, identifying dates when freely available to be viewed, and in the case of websites, the number of 'hits'.
  - Details of direct marketing used including a copy of the marketing brochure, details of who the marketing particulars were circulated to including the size of the database, whether the database used is mainly aimed at potential occupiers based locally or nationally. Distribution of marketing material should be on a quarterly basis.

- Whether a marketing board has been used and the dates it was displayed. Use of a marketing board is advised wherever possible.
- Details of the marketing outcomes should include any (a) expressions of interest; and (b) offers made. In both cases the interested parties should be identified and where the premises were rejected the reasons for doing so should be stated.

18.0.5 All marketing undertaken must meet the requirements set out in paragraph 18.0.3 and a marketing report must be submitted which includes the details set out in paragraph 18.0.4. More specific marketing requirements may be requested for different types of uses, as set out below.

### **Retail (A1 use class)**

18.0.6 Where a proposal involves a change of use away from retail that is not supported by policy within designated and non-designated shopping frontages, marketing must also include the following:

- A comparison of rents achieved for other comparable A1 uses relevant to the application site, taking into account the size of the unit and other matters such as location and servicing.
- Marketing evidence will be needed where there is a total loss of an A1 use or where the loss (including ancillary floorspace) is very substantial.

### **Pubs**

18.0.7 The Council will resist the loss of public houses, which are considered to be a valuable community facility. Where the loss of a public house, or substantial reduction in floorspace is proposed marketing must also include the following:

- Details should be provided about the operation of the public house (including at the time of closure if vacant) such as the turnover of the public house, the percentage split between wet sales and food and whether the premises is used as a music venue etc;
- It is expected that public houses will be marketed via an estate agent specialising in the leisure industry, where this is not the case the applicant should explain why
- Applicants should also have regard to the Campaign for Real Ale's (CAMRA) Public House Viability Test.
- Consideration should be given to a full range of other social and community infrastructure uses in line with policy LP 28 and the requirements set out in paragraph 18.0.13 below.

18.0.8 Please note that the Council will take into account the considerations set out in the supporting text to policy LP 27 including whether there is another public house within 400 metres. Applicants should address this when submitting a planning application.

### **Offices (B1 use class)**

18.0.9 Where a proposal involves a change of use or redevelopment resulting in a loss of office space (outside of the designated Key Office Areas), marketing must clearly demonstrate that there is no longer demand for an office based use in this location and that there is not likely to be in the foreseeable future. Marketing must also include the following:

- Evidence that the site has been marketed for the existing office use and other types of office-based uses such as flexible, start-up or co-working space.
- Offices should be marketed at a price commensurate with their existing quality or condition based on the local office market, by reference to comparables in the locality.
- The lease term should not be unduly restrictive and should include the potential for a short-term lease in appropriate cases. Details of the lease terms offered should be included in the marketing report

- Alternatively, the potential of upgrading the building or adapting the building to meet modern office requirements should be explored. This may include a viability assessment addressing the feasibility of refurbishing or modernising the existing office space.

18.0.10 If officers are satisfied that a full and proper marketing exercise has been completed, redevelopment or change of use away from office space should follow the sequential test outlined in policy LP 41.

18.0.11 Please note that marketing will not be accepted as justification for loss of office floorspace in designated Key Office Areas. There will be no net loss of office floorspace in these areas.

Industrial land and business parks (B1c, B2, B8 and Sui Generis use classes)

18.0.12 Where a proposal involves a change of use or redevelopment resulting in a loss of industrial space marketing must clearly demonstrate that there is no longer demand for an industrial based use in this location and that there is not likely to be in the foreseeable future. Marketing must also include the following:

- Attempts to market poorer quality premises should be on the basis of their present condition, and not on their potential for redevelopment in other employment uses, or proposing housing as the only viable option.
- In line with the sequential test outlined in policy LP 42, if marketing for an alternative industrial use is not forthcoming then consideration should be given to alternative employment generating uses including, in the first instance, B use classes such as offices and if these are not practicable then social infrastructure and community uses.

### **Social and Community Infrastructure (D Use Classes and Sui Generis uses)**

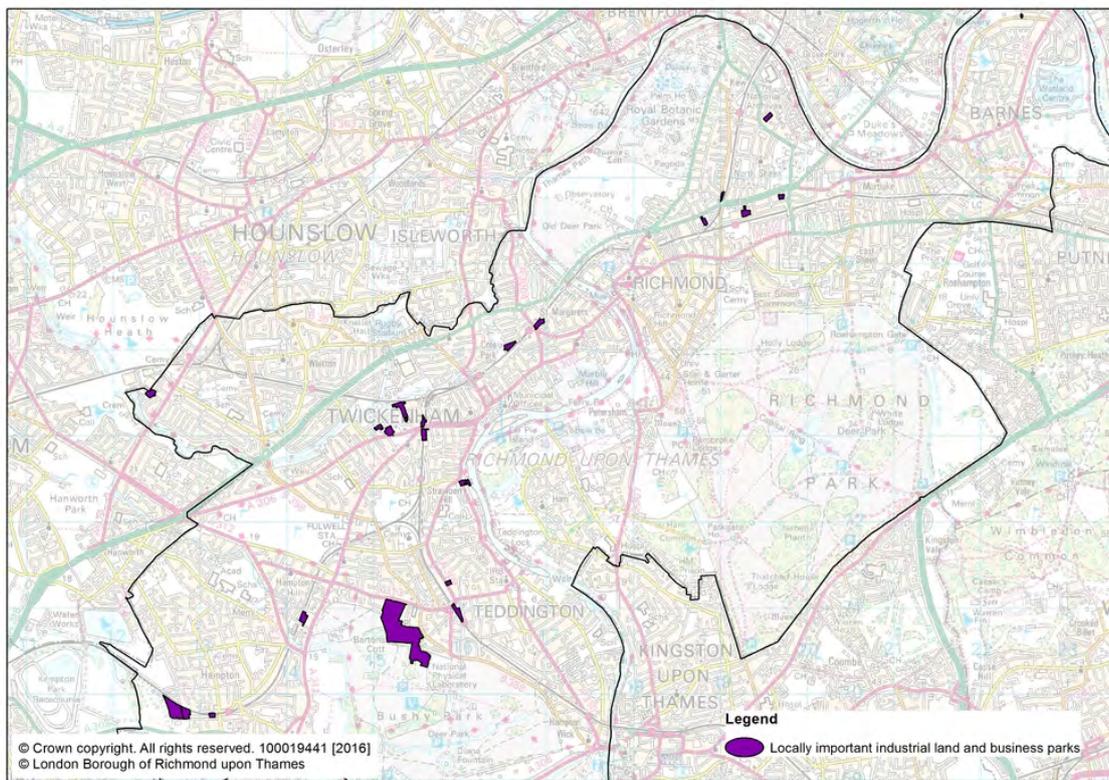
18.0.13 For applications involving any loss of a social and community infrastructure, it is very important that the potential of re-using or redeveloping the existing site for the same or an alternative social infrastructure is fully considered in line with policy LP 28. Marketing must also include the following:

- Evidence that the facility is no longer needed. Evidence of meaningful engagement with service providers or a public disposal process would be required to demonstrate this.
- Evidence that the loss of the facility would not have a detrimental impact on social and community service provision. For example, a marketing report could provide details of alternative facilities in close proximity and provide evidence that existing users have all been successfully relocated and that this has not resulted in any shortfall in provision.
- Consideration should be given to the potential for adapting the site / premises to meet community needs either now or in the future.
- Evidence should be provided to show that premises have been offered at a reasonable charge to appropriate user groups, e.g. at a discounted rate to community groups or voluntary organisations.
- Where the site is an existing health facility, consideration should first be given to re-using the site for other health facilities before other social infrastructure uses. Applicants should contact NHS Property Services and Richmond CCG to discuss their needs for health floorspace in the area.

## 19 Appendix 6 - Locally important industrial land and business parks

19.0.1 The following locally important industrial land and business parks, as set out in policy 42 in '10.3 'Industrial Land and Business Parks', are of particular importance for warehousing, distribution, storage and other industrial employment as well as locally important creative industries and other key employment facilities.

### Overview of locally important industrial land and business parks



### Kempton Gate Business Park, Oldfield Road, Hampton



### Kingsway Business Park, Oldfield Road, Hampton



### St Clare Business Park, Holly Road, Hampton



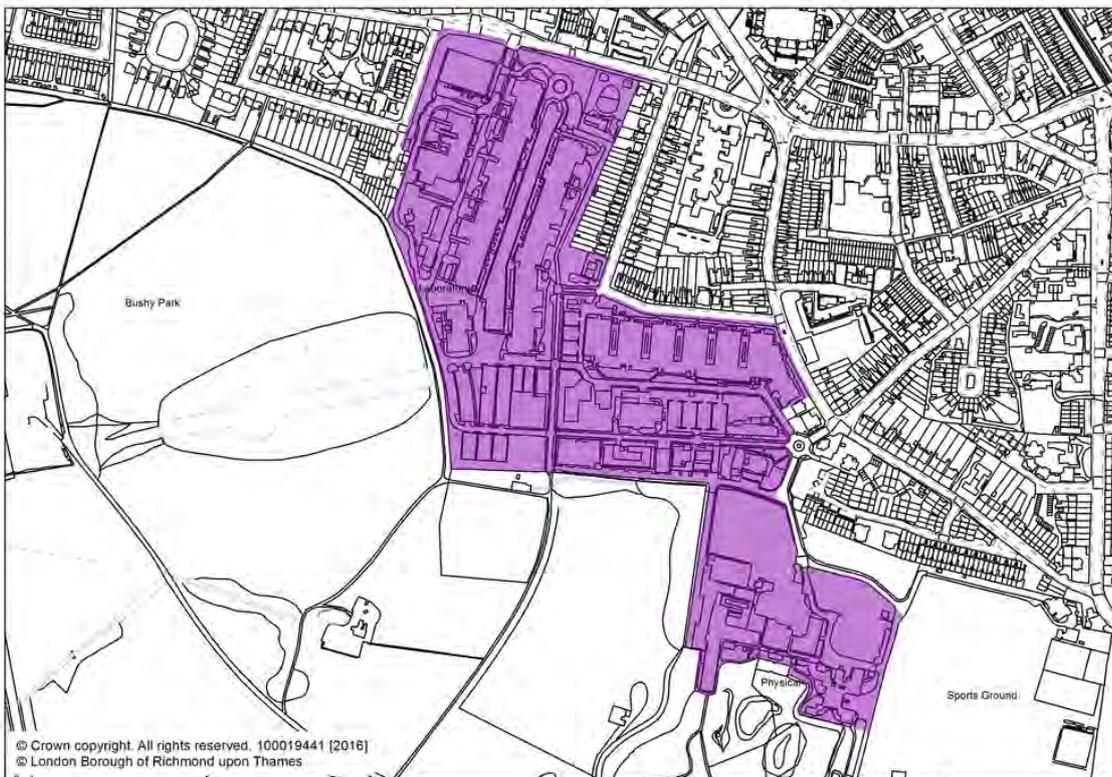
### 74 Oldfield Road, Hampton



### 50-56 Waldegrave Road, Teddington



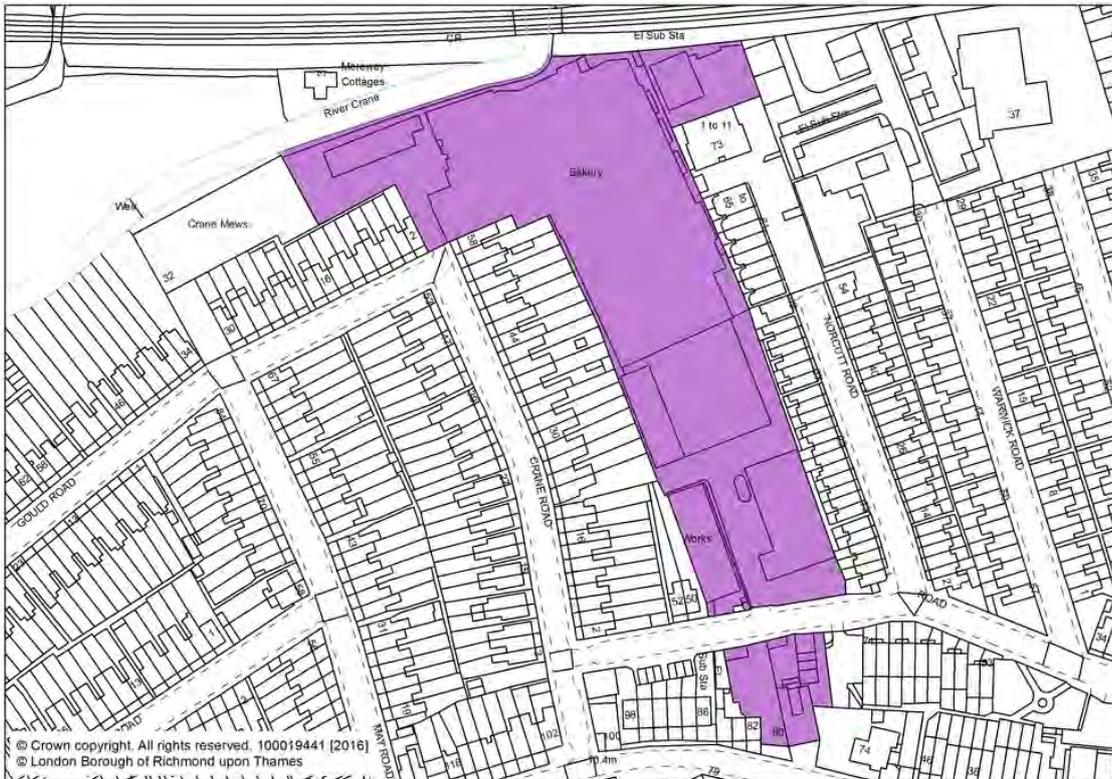
### National Physical Laboratory and LGC Ltd, Hampton Road, Teddington



### Teddington Business Park, Station Road, Teddington



### West Twickenham cluster (including Gregg's Bakery and surroundings), Twickenham



### Heathlands Industrial Estate, Twickenham



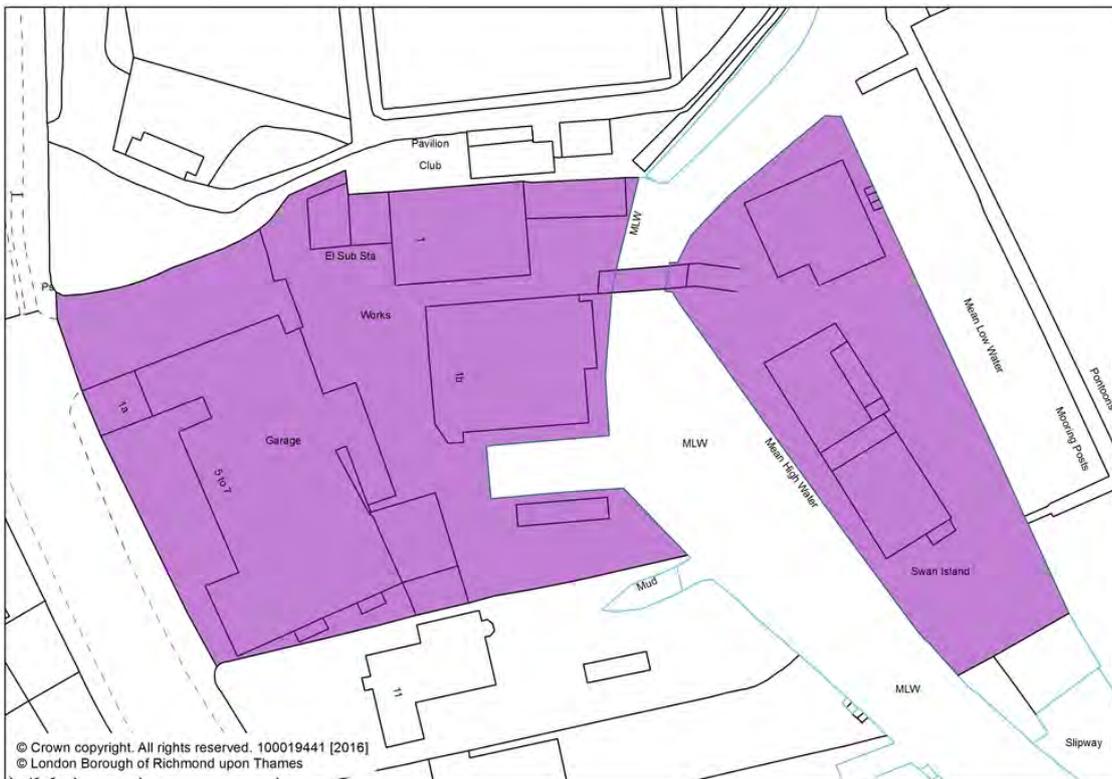
### St George's Industrial Estate, The Green, Twickenham



### Mereway Road Industrial Estate, Twickenham



### Swan Island Industrial Estate, Strawberry Vale, Twickenham



## Electroline House and surrounds, Twickenham



## St Margarets Business Centre, Winchester Road, St Margarets



## Twickenham Film Studios, St Margarets



## Market Road, Richmond



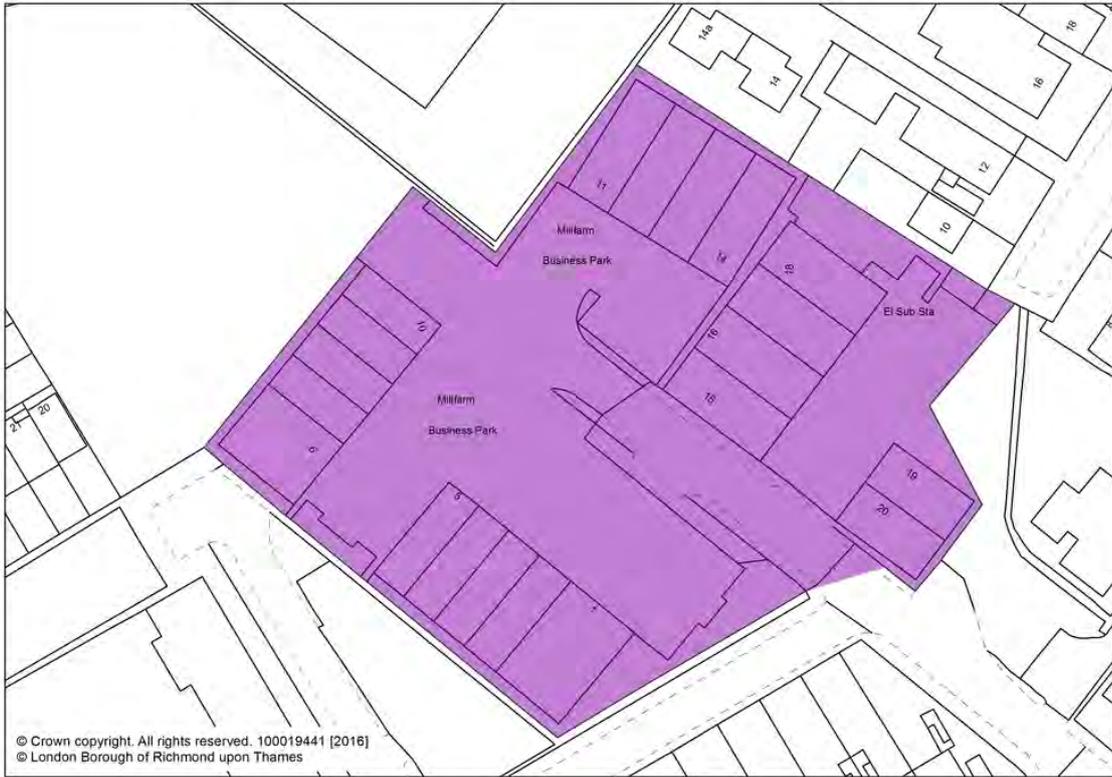
Sandycombe Centre, Sandycombe Road, Kew



Marlborough Trading Estate, Mortlake Road, Kew



Mill Farm Business Park, Whitton



Big Yellow Self Storage, Lower Mortlake Road, Richmond



**Big Yellow Self Storage, Lower Richmond Road, Richmond**



**Currie Easy Self Storage, Market Road, Richmond**



## 20 Appendix 7 – Glossary

### **Affordable Housing**

Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. The NPPF sets out further the definition of affordable housing.

### **Archaeological Resources**

This includes artefacts, archaeological features and deposits.

### **Article 4 Direction**

A direction which withdraws automatic planning permission granted under Article 4(1) of the Town and Country Planning (General Permitted Development) Order 2015 (as amended).

### **Biodiversity**

This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.

### **Blue Ribbon Network**

A spatial policy element of the London Plan covering London's waterways and water spaces, including land alongside them. Aside from the River Thames, the other major components of the network within the borough are the River Crane, Beverley Brook, Duke of Northumberland River and Longford River.

### **Building of Townscape Merit (BTM)**

Buildings of Townscape Merit are buildings, groups of buildings or structures of historic or architectural interest, which are locally listed due to their considerable local importance. Buildings of Townscape Merits are non-designated heritage assets.

### **BREEAM**

BREEAM (Building Research Establishment Environmental Assessment Method) sets standards for best practice in sustainable building design, construction and operation and has become one of the most comprehensive and widely recognised measures of a building's environmental performance. A BREEAM assessment uses recognised measures of performance, which are set against established benchmarks, to evaluate a building's specification, design, construction and use. The measures used represent a broad range of categories and criteria from energy to ecology. They include aspects related to energy and water use, the internal environment (health and wellbeing), pollution, transport, materials, waste, ecology and management processes.

### **Brownfield Site (see Previously Developed Land)**

### **Business Improvement Districts (BIDs)**

A Business Improvement District (BID) is a defined area within which businesses are required to pay an additional tax (or levy) in order to fund projects within the BID's boundaries.

### **Car Club**

These are schemes such as city car clubs and car pools, which facilitate vehicle sharing.

### **Capital Asset Value for Amenity Trees (CAVAT)**

CAVAT provides a methodology for calculating the monetary value and/or compensation where a tree is felled or damaged. It works by calculating a unit value for each square centimetre of tree stem, by extrapolation from the average cost of a range of newly planted trees. This basic value is adjusted to reflect the degree of benefit that the tree provides to the local population. The adjustment is designed to allow the

final value to reflect realistically the contribution of the tree to public welfare through tangible and intangible benefits. For further information see the [London Tree Officers Association](http://www.ltoa.org.uk/resources/cavat) website at [www.ltoa.org.uk/resources/cavat](http://www.ltoa.org.uk/resources/cavat)

### **Centre Hierarchy**

The hierarchy of centres in the borough categorises centres and parades into 4 types – main centres, local centres, neighbourhood centres and parades of local importance. They range significantly in size and function. Paragraph 23 of the NPPF requires local planning authorities to define such a hierarchy.

### **Combined Heat and Power (also see Decentralised Energy)**

The combined production of electricity and usable heat is known as Combined Heat and Power (CHP). Steam or hot water, which would otherwise be rejected when electricity alone is produced, is used for space or process heating.

### **Community Infrastructure Levy (CIL)**

The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008, as a tool for local authorities to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010. It allows local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

### **Community Plan**

The Community Plan 2016 - 2020 is the Richmond Partnership's overall vision for the borough and describes how the Council and its partners will work together with the local community to inform everything they do and put people first. Further information can be found on the [Council's website](http://www.richmond.gov.uk/community_plan) at [www.richmond.gov.uk/community\\_plan](http://www.richmond.gov.uk/community_plan)

### **Comparison Retail / Shopping**

These refer to shopping for items such as clothes, electrical, furniture and leisure goods, which are not bought on a regular basis.

### **Conservation (Heritage)**

The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

### **Conservation Area**

An area declared by a local planning authority in accordance with the Town and Country Planning Act 1990 (as amended), as being of special architectural, historical or landscape interest, the character or appearance of which it is desirable to preserve or enhance.

### **Construction and Demolition Waste**

This is waste arising from the construction, repair, maintenance and demolition of buildings and structures, including roads. It consists mostly of brick, concrete, hardcore, subsoil and topsoil, but it can contain quantities of timber, metal, plastics and occasionally special (hazardous) waste materials.

### **Decentralised Energy (also see Combined Heat and Power)**

Decentralised energy generation can be described as the generation of energy in the form of heat and electrical power at or near the point of use, delivered to users via distribution pipes. This is in contrast to the traditional (and more inefficient) centralised concept, where energy is transported, in some cases, many hundreds of miles from a centralised power station to the point of energy use. Schemes can vary in size from a few dwellings to wider networks.

### **Designated Heritage Asset**

A World Heritage Site, Scheduled Monument, listed building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

## **Designated Shopping Frontage**

Key shopping frontages are designated where retail uses already predominate and where retail use is to be retained. They are generally located in the core part of a centre and can be designated in parades of local importance.

Secondary shopping frontages are usually adjacent to key shopping frontages in less core positions, but are still important to supporting the retail function of the centre or parade. There is scope to increase other valued and complementary non-retail uses such as cafés, financial and professional services and community uses.

## **Developer Contributions (see Planning Obligations or Community Infrastructure Levy)**

### **Development**

This refers to development in its widest sense, including buildings, and in streets, spaces and places. It also refers to both redevelopment, including refurbishment, as well as new development and changes of use. The full definition is set out in Section 55 of the Town and Country Planning Act 1990.

### **Development Brief**

A brief that sets out the vision and parameters for a development site. Apart from its aspirational qualities, a brief includes site constraints and opportunities, infrastructure requirements such as energy and transport, access and planning policies. It also sets out the proposed uses and key design principles and requirements.

## **Employment Land - See 'Offices' and 'Industrial Land and Business Parks'**

### **Energy Efficiency**

This is about making the best or most efficient use of energy in order to achieve a given output of goods or services, and of comfort and convenience. This does not necessitate the use of less energy, in which respect it differs from the concept of energy conservation.

### **Energy Hierarchy**

The Mayor of London's approach to reducing carbon dioxide emissions in the built environment. The first step is to reduce energy demand (be lean), the second step is to supply energy efficiently (be clean) and the third step is use renewable energy (be green).

### **Environmental Impact Assessment (EIA)**

A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment. The process of Environmental Impact Assessment is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended).

### **Evaporation**

The physical process by which a liquid such as water is transformed to the gaseous state/vapour.

### **Evapotranspiration**

The sum of evaporation and transpiration, which means the discharge of water from the earth's surface to the atmosphere by evaporation from surface water and soil surfaces and by transpiration from plants (plants emitting water vapour from their leaves).

### **Examination**

Undertaken on the 'soundness' of the Submission Local Plan, namely that it is positively prepared, justified, effective and consistent with national policy. The examination is held by an independent inspector appointed by the Secretary of State.

### **Extra Care**

Extra Care is housing with care primarily for older people where occupants have specific tenure rights to occupy self-contained dwellings and where they have agreements that cover the provision of care, support, domestic, social, community or other services. This helps people to live independently, avoiding the need to move into a residential care setting. Schemes vary in scale and nature so an assessment will be made on a scheme by scheme basis if a proposal is considered as 'extra care', depending on the nature of the housing

and its design features, the support services available including how care is bought and provided, and any eligibility criteria for tenants or owners.

### **Family housing**

Family housing is generally defined as having three or more bedrooms, however if of a suitable size (meeting the Nationally Described Space Standard and the external amenity standards) a two bedroom property can be designed for 3 or 4 persons and would be considered as family housing.

### **Fluvial water**

Water in the River Thames and other rivers.

### **Green Belt**

Green Belt is a national policy designation and there is a general presumption against inappropriate development in the Green Belt. In line with the NPPF, the Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

### **Green Infrastructure**

The multi-functional, interdependent network of open and green spaces – and green features such as street trees and green roofs – including the Blue Ribbon Network, which is capable of delivering a wide range of environmental and quality of life benefits for local communities (people and wildlife), including flood management; urban cooling; improving physical and mental health; green transport links (walking and cycling routes); ecological connectivity; and food growing. Green and open spaces of all sizes can be part of green infrastructure provided they contribute to the functioning of the network as a whole.

### **Green roofs/walls**

Planting on roofs or walls to provide climate change, amenity, food growing and recreational benefits.

### **Habitable Rooms**

Includes all separate living rooms and bedrooms, plus kitchens with a floor area of 13sqm or more.

### **Health Inequalities**

Health inequalities are defined by the UK Government as ‘inequalities in respect of life expectancy or general state of health which are wholly or partly a result of differences in respect of general health determinants.’

### **Health Impact Assessment (HIA)**

HIAs are a method of estimating the potential health effects of the implementation of a plan or programme where there are likely to be significant impacts.

### **Historic Environment**

All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

### **Inclusive design**

Design that creates an environment where everyone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers that create undue effort, separation or special treatment, and enables everyone regardless of disability, age, or gender to participate equally, confidently and independently in mainstream activities with choice and dignity.

## **Industrial land and business parks**

Industrial land and business parks are identified in this Plan (see Policy LP 42) and refer to land used for general industry, light industry, warehouses, open storage, self storage, distribution and logistics and other similar types of employment, as well as any other uses which fall within the B1(c), B2, B8 Use Classes or are Sui Generis (such as vehicle repair garages, scrap yards, petrol filling stations, builders' merchants).

## **Infrastructure Delivery Plan (IDP)**

The IDP sets out the borough's infrastructure requirements over the lifetime of the Local Plan. It covers a range of social and community infrastructure, emergency services, green infrastructure, utilities and physical infrastructure, transport infrastructure as well as heritage assets.

## **Infrastructure Delivery Schedule (IDS)**

The IDS sets out the where, what, why, who and when key infrastructure that is required in the borough will be delivered.

## **International, national and locally designated sites of importance for biodiversity**

All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

## **Listed building**

A building of special architectural or historic interest included on a statutory list. Permission is required for their demolition or alteration. Listed buildings are 'Designated Heritage Assets'.

## **Local Centre**

Centres categorised in the second tier of the borough's centre hierarchy: Barnes (High Street & Church Road), East Twickenham, Hampton Hill, Hampton Village, Ham Parade, Kew Gardens and St Margarets. These centres have a range of shops and services and provide cultural and community facilities and places to meet, work and live. Most are defined on the Policies Map by an Area of Mixed Use boundary (AMU).

## **Local Development Framework - see Local Plan and Local Development Document**

## **Local Green Space (LGS)**

Local communities can identify green or open space which is of special quality and holds particular significance and value to the local community which it serves, in line with paragraphs 76 to 78 of the National Planning Policy Framework (NPPF). Local Green Spaces can only be designated when a local plan or neighbourhood plan is prepared or reviewed. National policy on Green Belt applies to any designated Local Green Space.

## **Local Implementation Plan (LIP) for Transport**

Statutory transport plans produced by London boroughs bringing together transport proposals to implement the Mayor's Transport Strategy at the local level.

## **London Development Database**

This provides current and historic information about development progress across all London boroughs. It is operated by the Greater London Authority.

## **London Plan**

The London Plan is the spatial development strategy for the Greater London area and the Mayor of London is responsible for producing this planning strategy. The London Plan deals with matters of strategic importance to the area and forms part of the Development Plan for the borough. The plan was first published by the Greater London Authority in 2004 and has been amended in 2008, 2011, 2013, 2015 and most recently the 2015-16 Minor Alterations.

## **Main centre**

There are five main centres in the borough: the principal centre of Richmond, and Twickenham, East Sheen, Teddington and Whitton. These centres are the largest in the borough and they have an important role to play, providing shops, services, employment opportunities, housing and being a focus for community and cultural life. They are defined on the Policies Map by a Main Centre Boundary (MCB).

## **Metropolitan Open Land (MOL)**

Strategic open land within the urban area that contributes to the structure of London. MOL is predominantly open land or water which is of significance to London as a whole, or to a part of London.

## **Mixed Use Development**

Development for a variety of activities on single sites or across wider areas such as within centres.

## **National Planning Policy Framework (NPPF)**

The NPPF, published in March 2012, sets out the Government's planning policies for England and how these are expected to be applied, alongside other national planning policies. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

## **Nature Conservation**

Protection, management and promotion for the benefit of wild species and habitats, as well as the human communities that use and enjoy them. This also covers the creation and re-creation of wildlife habitats and the techniques that protect genetic diversity and can be used to include geological conservation.

## **Neighbourhood Centre**

Centres categorised in the third tier of the borough's centre hierarchy: Castelnau, Friars Stile Road, Hampton Wick, Heathside (Powder Mill Lane), Sheen Road, Kingston Road (Teddington), Stanley Road (Teddington), White Hart Lane (Barnes/Mortlake). Not as large as 'local centres', neighbourhood centres also provide a focus for local communities and opportunities to meet, shop, work and spend leisure time. Most are defined on the Policies Map by an Area of Mixed Use boundary (AMU).

## **Neighbourhood (Development) Plan - also see Village Planning**

Neighbourhood Plans can establish a vision for an area, include general planning policies for the development and use of land in a designated neighbourhood area and they can allocate sites for development. These are plans on a much smaller scale than the Local Plan and should therefore be about local rather than strategic issues. Neighbourhood planning is optional and a Neighbourhood Plan can only be written by a designated Neighbourhood Forum for a designated Neighbourhood Area. Neighbourhood Plans, once made, form part of the borough's Development Plan. In this borough, the Ham and Petersham Neighbourhood Forum is preparing a Neighbourhood Plan for its area.

## **Office**

A building or premises falling within the B1(a) Use Class Order.

## **Other Open Land of Townscape Importance (OOLTI)**

Open areas, which are not extensive enough to be defined as Metropolitan Open Land, but act as pockets of greenery of local significance, contribute to the local character, and are valued by residents as open spaces in the built up area. These areas can include public and private sports grounds, some school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. OOLTI is a local policy and new designations are made by the Council as part of the plan-making process. This is different to 'Local Green Space' (see definition above), which national policy makes provision for.

## **Open Space**

All land that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers a broad range of types of open spaces, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

## **Other Sites of Nature Importance (OSNI's)**

Other Sites of Nature Importance, as identified on the Policies Map, are sites which have either been classified as having importance for biodiversity (regionally known as Sites of Importance for Nature Conservation) or the potential to have biodiversity.

## **Sites of Importance for Nature Conservation (SiNC's)**

Sites of Importance for Nature Conservation (also known as Local Sites outside of London) are non-statutory wildlife sites designated at a local or regional level for their importance for conservation. In London there are three tiers of such sites:

**Sites of Metropolitan Importance:** these are the best examples of wildlife sites in London and are selected by the Mayor of London and his officers at the Greater London Authority.

**Sites of Borough Importance:** selected at a borough level these are important wildlife sites for the Borough. These are graded into Borough grade 1 or grade 2

**Sites of Local Importance:** selected at a borough level these sites ensure that everyone has easy access to nature close to home.

Within the London Borough of Richmond upon Thames, relevant SiNC's are identified as Other Sites of Nature Importance (OSNI's) on the Policies Map.

## **Parade of Local Importance**

Centres categorised in the fourth tier of the borough's centre hierarchy: Ashburnham Road, Fulwell, Ham Street/Back Lane, Hampton Nursery Lands, Hospital Bridge Road, Kew Green, Kew Road, Lower Mortlake Road, Nelson Road, St Margarets Road (north of the A316), Sandycombe Road (Kew), Strawberry Hill, Twickenham Green, Waldegrave Road, Whitton Road. These centres are important for meeting mainly local but valued needs for communities. Many are defined on the Policies Map by an Area of Mixed Use boundary (AMU).

## **Permitted Development Rights**

Permitted Development Rights are a national grant of planning permission, which allow certain building works and changes of use to be carried out without having to make a planning application. Permitted Development Rights are subject to conditions and limitations to control impact and to protect local amenity.

## **Planning Condition**

A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990).

## **Planning Obligation**

A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. A Planning Obligation places a charge on the land to which it relates.

## **Planning Practice Guidance (PPG)**

The national Planning Practice Guidance was published by Government as a web-based resource in March 2014 (and as amended), adds further context to the NPPF. Local planning authorities should have regard to advice contained in the PPG when developing their plans. The PPG is also a 'material consideration' when taking decisions on planning applications.

## **Playing Field**

The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010.

## **Previously Developed Land**

Previously-developed land is that which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. This excludes land in built-up areas such as private residential gardens, parks, recreation grounds and allotments and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

## **Policies Map**

A supporting document illustrating the spatial policies of the adopted plans.

## **Public Open Space**

Parks and similar land for public use, whether provided by the Council, or privately, where access for the public is secured by virtue of legal arrangements.

## **Public Realm**

This is the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces.

## **Public Transport Accessibility Levels (PTAL)**

A measure of the relative accessibility of a point to the public transport network, taking into account walk access time and service availability (the higher the PTAL score, the better the accessibility).

## **Registered Providers**

These are normally approved housing associations, who provide social housing for the Council, previously known as Registered Social Landlords. The Registered Providers share the Richmond Housing Register and must be approved by the Homes and Communities Agency.

## **Renewable Energy**

Energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy. Although not strictly renewable, geothermal energy is generally included.

## **Residential Care**

Residential care homes are residential developments where a number of older people live, usually in single rooms, and have access to on-site care services. A home registered simply as a care home will provide personal care only – help with washing, dressing and giving medication. Care homes with nursing provide the same personal care, but also have a qualified nurse on duty twenty-four hours a day to carry out nursing tasks. These homes are for people who are physically or mentally frail or people who need regular attention for a nurse. Homes registered for nursing care may accept people who just have personal care needs but who may need nursing care in the future. Residential care homes are regulated by the Care Quality Commission.

## **Retrofitting**

The addition of new technology or features to existing buildings in order to make them more efficient and to reduce their environmental impacts.

## **Richmond Biodiversity Action Plan**

A plan that sets objectives and actions for the conservation of biodiversity in the borough. The action plan also identifies priority species and habitats for conservation.

## **Scoping Report (Sustainability Appraisal)**

This includes baseline information and identifies key environmental and sustainability issues for the borough. It sets out the framework for conducting a Sustainability Appraisal of the policies and sites as set out in this Plan.

## **Site of Special Scientific Interest (SSSI)**

Protected area of land considered worthy of protection and of special interest by reasons of its flora, fauna or geological features. SSSIs are designated by Natural England under the Wildlife and Countryside Act 1981.

## **Significance (Heritage)**

The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

## **Smart City**

There is no absolute definition of a Smart City, no end point, but rather a process, or series of steps, by which cities become more "liveable" and resilient and, hence, able to respond quicker to new challenges.

Thus, a Smart City should enable every citizen to engage with all the services on offer, public as well as private, in a way best suited to his or her needs. It brings together hard infrastructure, social capital including local skills and community institutions, and (digital) technologies to fuel sustainable economic development and provide an attractive environment for all.

### **Social Inclusion**

The position from where someone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers for people or for areas that experience a combination of linked problems such as unemployment, poor skills, low incomes, poor housing, high crime environments, bad health and family breakdown.

### **Social infrastructure**

Covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.

### **Statutory Development Plan**

The statutory development plan is the plan for the future development of an area. It consists of:

- Local Plans: development plan documents adopted by local planning authorities, including any 'saved' policies from the Unitary Development Plan
- The London Plan: the spatial development strategy prepared by the Mayor of London
- Neighbourhood plans: where these have been supported by the local community at referendum and subsequently made by the local planning authority.

### **Strategic Environmental Assessment (SEA)**

Required by European and UK law, SEA is a way of systematically identifying and evaluating the impacts that a plan is likely to have on the environment. The aim is to provide information in the form of an Environmental Report that can be used to enable decision makers to take account of the environment and minimise the risk of the plan causing significant environmental damage. Government guidance advises that where a plan requires both strategic environmental assessment and sustainability appraisal, that the former process should be integrated into the latter one.

### **Strategic Flood Risk Assessment (SFRA)**

A Strategic Flood Risk Assessment is a study carried out by one or more local planning authorities to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the impact that land use changes and development in the area will have on flood risk.

### **Sui Generis**

Uses which do not fall within any Use Class. Such uses include betting offices / shops, theatres, larger houses in multiple occupation, scrap yards, launderettes, night clubs and pay day loan shops.

### **Supplementary Planning Documents (SPD)**

Documents which add further detail to the policies in the Local Plan. SPDs can be used to provide further guidance for development on specific sites, or on particular issues, such as design. SPDs are material considerations in planning decisions but are not part of the statutory development plan.

### **Supplementary Planning Guidance (SPG)**

SPGs have been produced by the Council to provide greater detail on policies. Since 2004, the Council has no longer produced SPGs as they have been replaced by SPDs. However, the Council's SPGs remain material considerations in planning decisions unless withdrawn.

The Mayor of London produces SPGs to provide further guidance on policies in the London Plan that cannot be addressed in sufficient detail in the plan itself.

### **Sustainability Appraisal (SA)**

The Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development. Sustainability Appraisal is a systematic appraisal process. The purpose of Sustainability Appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document from the outset of the preparation process. This will ensure that decisions are made that accord with sustainable development.

### **Sustainable Drainage Systems (SuDS)**

A sequence of management practices and control structures designed to drain surface water in a sustainable way. SuDS aims to control surface water runoff as close to its origin as possible, which involves moving away from traditional piped drainage systems to schemes that mimic natural drainage regimes.

### **Tall Building**

A building defined as 18 metres in height or higher (approximately six storeys or above).

### **Taller Building**

A building defined as being significantly taller than the neighbouring buildings, but less than 18 metres in height (below six storeys).

### **The Richmond upon Thames Partnership**

The Richmond upon Thames Partnership brings together the public, private and voluntary and community sectors. It has representatives from the public sector, business, community, voluntary and faith sectors who harness joint resources to improve the quality of life for everyone who lives in, works in or visits the borough. The Richmond Partnership has an Executive Group which draws together senior members of the Council, Richmond Adult Community College, Richmond Voluntary Services, Police, Fire Brigade, Richmond upon Thames College, Achieving for Children and the Clinical Commissioning Group. For further information, see the [Council's website](http://www.richmond.gov.uk/richmond_upon_thames_partnership) at [www.richmond.gov.uk/richmond\\_upon\\_thames\\_partnership](http://www.richmond.gov.uk/richmond_upon_thames_partnership)

### **Third Generation (3G) playing pitch**

A type of artificial grass pitch (AGP) known as 'third generation turf'. With 3G turf, the pile (the artificial grass 'blades') is supported by an infill of rubber crumb. Sports that can use 3G pitches include football, rugby and lacrosse, providing that certain specifications are met for each sport.

### **Transport Assessment (TA)**

A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.

### **Transport Statement (TS)**

A simplified version of a Transport Assessment where it is agreed the transport issues arising out of development proposals are limited and a full Transport Assessment is not required.

### **Travel Plan**

A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action and is articulated in a document that is regularly reviewed.

### **Tidal water**

The part of the River Thames that is subject to tides.

### **Urban Heat Island Effect**

The absorption and retention of heat that results in urban areas becoming warmer at night than rural areas.

### **Use Classes Order**

The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'.

## **Village**

A term applied to define the distinct and local areas in this borough as determined by local communities.

## **Village Plans / Village Planning**

Village Plans have been developed for each of the borough's 14 villages. Each Village Plan describes a vision for the village area and identifies what the Council will do and what people can do to achieve the vision together. It sets out the key issues and priorities and provides background information on the village areas. The Village Plans are maintained on the Council's website and are updated on a regular basis. They cover a wide range of topics, including matters not within the remit of the Village Planning Guidance SPDs. See the [Council's website](http://www.richmond.gov.uk/village_plans) at [www.richmond.gov.uk/village\\_plans](http://www.richmond.gov.uk/village_plans) for further information.

## **Village Planning Guidance SPDs**

SPDs that are being developed for the borough's villages (with the exception of Ham and Petersham, where the designated Neighbourhood Forum is developing its own Neighbourhood Plan for the area), which identify the key features and characteristics of the area, including the most important aspects and features that contribute to local character and that are valued by local communities. They form part of the Village Plan for area.

## **Zero Carbon**

The Mayor of London defines 'Zero carbon' homes as homes forming part of major development applications where the residential element of the application achieves at least a 35% reduction in regulated carbon dioxide emissions (beyond Part L Building Regulations 2013) on-site . The remaining regulated carbon dioxide emissions, to 100%, are to be off-set through a cash in lieu contribution to the Council's Carbon Offset Fund, which is ring fenced to secure delivery of carbon dioxide savings elsewhere in the borough.