

# **Report to the Council of the London Borough of Richmond upon Thames**

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Inspectors appointed by the Secretary of State

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Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

## **Report on the Examination of the Richmond upon Thames Local Plan**

The Plan was submitted for examination on 19 January 2024

The examination hearings were held between 25 June and 10 July 2024

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## **Abbreviations used in this report**

DtC	Duty to Co-operate
GLA	Greater London Authority
HDT	Housing Delivery Test
LHNA	Local Housing Needs Assessment
MM	Main Modification
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
PTAL	Public Transport Accessibility Level
RuTLP	Richmond upon Thames Local Plan
SINC	Site of Importance for Nature Conservation
SoCG	Statement of Common Ground
TfL	Transport for London
UDS	Urban Design Study

## **Non-Technical Summary**

This report concludes that the Richmond upon Thames Local Plan provides an appropriate basis for the planning of the London Borough of Richmond upon Thames, provided that a number of main modifications [MMs] are made to it. The Council of the London Borough of Richmond upon Thames has specifically requested that we recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MMs were subject to public consultation over a six-week period. In some cases, we have amended their detailed wording and/or added consequential modifications where necessary. We have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment and all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Amending the housing trajectory within Policy 10 New Housing (Strategic Policy) to reflect the latest evidence and ensure ‘general conformity’ with the requirements of the London Plan;
- Amending Policy 11 Affordable Housing (Strategic Policy) to ensure ‘general conformity’ with the London Plan, including to reflect the 35% threshold for the fast-track route (or 50% on public sector land or employment sites);
- Amending Policy 39 Biodiversity and Geodiversity to align the borough’s minimum Biodiversity Net Gain requirements with national minimum requirements at 10% (rather than 20%);
- Rewording policies to ensure they are positively prepared and consistent with the NPPF;
- Adding or amending policies and explanatory text to guide development;
- Update the Policy requirements in relation to a number of site allocations to ensure the Policy wording is clear, precise, and effective; and
- A number of other modifications to ensure that the Plan is positively prepared, justified, effective and consistent with national policy.

## Introduction

1. This report contains our assessment of the Richmond upon Thames Local Plan (RuTLP) in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan’s preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework 2023<sup>1</sup> (paragraph 35) (NPPF) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound Plan. The RuTLP, submitted in January 2024 is the basis for our examination. It is the same document as was published for consultation during June and July 2023.

## Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that we should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. Our report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MM schedule was subject to public consultation for six weeks. We have taken account of the consultation responses in coming to our conclusions in this report and in this light, we have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal/habitats regulations assessment that has been undertaken. Where necessary we have highlighted these amendments in the report.

## Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development

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<sup>1</sup> The Plan is examined under the transitional arrangements of the NPPF 19 December 2023

plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission Plan highlighted changes to the Policies Map designations, alongside each policy, and a separate submission policies map comprises the set of plans identified as the Richmond Local Plan 'The best for our borough' Regulation 19 Policies Map, December 2023 (SD-10).

6. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map.
7. These further changes to the policies map were published for consultation alongside the MMs [Appendix 4: Review of Sites of Importance for Nature Conservation].
8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in SD-010 Policies Map and the further changes published alongside the MMs.

## **Context of the Plan**

9. The RuTLP is intended to fully replace the policies and site allocations in the adopted Local Plan that comprises of the existing 2018 Local Plan, and the Twickenham Area Action Plan 2013 within a single Local Plan Document. Once adopted the RuTLP will set out the spatial development strategy for the borough, along with strategic policies, detailed area strategies and associated site allocations, and development management policies to contribute towards securing Richmond upon Thames' social, environmental, and economic objectives.
10. Richmond upon Thames is one of the largest London boroughs, in terms of area, covering an area of some 5,095 hectares. The borough is unique in that it straddles both sides of the river Thames and stretches from Richmond Park to the east to Whitton to the west. The borough includes a diverse range of communities and many distinct neighbourhoods. The largest town centre is Richmond, with four other large centres at Twickenham, Teddington, East Sheen and Whitton and many smaller centres and local parades. The borough is interspersed with open space and historic landscapes such as Richmond and Bushy Parks and the Old Deer Park amongst the network of green and blue infrastructure, which provide a green lung for southwest London.

11. In total, more than two thirds of the borough is protected by either open land or conservation designations. The borough is home to the Royal Botanic Gardens, Kew World Heritage Site and the historic environment includes 85 designated Conservation Areas, over 1,100 listed buildings, as well as 14 Historic Park and Gardens all of which contribute to the special character of the borough. These are a major reason for the approximate 4.5 million tourists that visit the borough every year.
12. Many other areas in the borough are relatively dense low-medium rise towns and centres. Whilst a significant benefit the historic environment allied to the green and blue infrastructure are also constraints that mean that land values are high and opportunities for new development are limited. There are limited opportunities for the development of large sites leading to a dependency on small sites to contribute to meeting the borough’s housing need. The scarcity of land means that affordability is a particular concern.

## **Public Sector Equality Duty**

13. The Council carried out an Equality Impact and Needs Analysis of the submitted Plan (SD-003). We have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This, amongst other matters, sets out the need to advance equality of opportunity and foster good relations between people who share a protected characteristic and people who do not share it.
14. We have considered several matters during the examination including housing needs of different groups, social and community infrastructure, and health and wellbeing (Policies 12, 49 and 51), also for those who need accessible housing (Policy 13) along with ensuring there is adequate provision to meet the accommodation needs of Gypsies and Travellers (Policy 12). In this way the disadvantages that they suffer would be minimised and their needs met in so far as they are different to those without a relevant protected characteristic. There is also no compelling evidence that the RuTLP as a whole would bear disproportionately or negatively on them or others in this category.

## **Assessment of Duty to Co-operate**

15. Section 20(5)(c) of the 2004 Act requires that we consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan’s preparation.
16. The submitted Plan was accompanied by a number of statements of common ground (SoCGs) with neighbouring authorities and relevant Duty to Cooperate (DtC) bodies as required by paragraph 27 of the NPPF. Further

commentary can be found within the Duty to Co-operate Statement, 18 January 2024 (SD-015).

17. The evidence demonstrates that the Council has been involved in ongoing and constructive engagement on strategic planning matters during the preparation of the RuTLP. In particular with the neighbouring London Boroughs of Hounslow, Wandsworth, Hammersmith & Fulham, and the Royal Borough of Kingston upon Thames. Meaningful engagement also took place with the neighbouring boroughs of Elmbridge and Spelthorne, and Surrey County Council.
18. The Council has demonstrated meaningful engagement with the following prescribed bodies; the Environment Agency, Historic England, Natural England, the Mayor of London/Greater London Authority, Transport for London as well as other bodies such as the London Healthy Urban Development Unit/NHS South West London Integrated Care Board, and National Highways.
19. We are satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

## **Assessment of Other Aspects of Legal Compliance**

20. The Plan has been prepared in accordance with the Council’s Local Development Scheme 2025 to 2028, last updated 6 March 2025.
21. Consultation on the Plan and the MMs was carried out in compliance with the Council’s Statement of Community Involvement dated 2 December 2019.
22. The Council carried out a sustainability appraisal of the Plan, prepared a report of the findings of the appraisal, and published the report along with the Plan and other submission documents under regulation 19. The appraisal was updated to assess the main modifications.
23. The Habitats Regulations Assessment April 2023 (and updated June 2024) sets out why an Appropriate Assessment is not necessary. The RuTLP is not likely to have adverse effects on the integrity of European sites, either alone or in-combination with other plans or projects, providing that the mitigation set out in the Local Plan is implemented successfully.



24. The Development Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.
25. The Development Plan, taken as a whole, includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.
26. The Plan subject to the Main Modifications contained within our report is in general conformity with the spatial development strategy (The London Plan).
27. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

## **Assessment of Soundness**

### **Main Issues**

28. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, we have identified three main issues upon which the soundness of this Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

### **Issue 1 – Is the Plan's Spatial Development Strategy based on robust evidence, justified, and is it in 'general conformity' with the London Plan, and effective?**

29. The Vision and Strategic Objectives section of the RuTLP sets out the ten themes that inform the vision for growth in the borough. It seeks to respond to the climate emergency, deliver new homes, shape and support its town and local centres, increase jobs and help businesses grow and bounce back following the pandemic. It also seeks to protect what is special and looks to improve its areas, tackling biodiversity loss by retaining and improving existing as well as creating new biodiverse areas, improve design, delivering beautiful buildings, reduce the need to travel and improve choices for more sustainable travel, securing new social and community infrastructure, and creating safe, healthy and inclusive communities. These objectives direct development to the most appropriate locations within the borough and underpin the Plan's spatial strategy.
30. These social, environmental and economic priorities for delivering sustainable development in the borough are consistent with the objectives of

the NPPF. In the interests of effectiveness **MM1** and **MM6** amend the title of the Plan and Policy 2 respectively so that it is clear for the decision maker that the Plan refers to the geographical area of the borough of Richmond upon Thames. These modifications also clearly define the Plan period as 2024 to 2039. For effectiveness **MM2** modifies the strategic vision section of the Plan to ensure that all sections of the community have access to public transport to assist in overcoming barriers to employment and services, especially those with reduced mobility.

31. To ensure consistency with Policy 1 and to reflect the requirements of the Water Framework Directive, **MM3** modifies the final bullet point of Objective 6 on page 17 so that opportunities to use natural flood management techniques for wider local community benefits and habitats improvements are realised. This is considered an effective approach to make the Plan sound.
32. Policy 1 Living Locally and the 20-minute neighbourhood is a strategic policy that seeks to create environments that make it easier to be physically active, enhance opportunities for walking and cycling safety. It also seeks to create high quality public spaces and public realm, improve connectivity and accessibility for all, and create places that people want to go to and use and ‘live locally’ and aims to improve, not restrict, accessibility and movement. To ensure it is effective, **MM4** modifies the policy so it is clear to the decision maker that development proposals should have regard to the Mayor’s Vision Zero which aims to reduce road danger and create a safer transport environment for all.
33. Policy 2 Spatial Strategy: Managing change in the borough seeks to address the needs of the borough, by setting out a strategy to deliver new homes, jobs, and the facilities, services and infrastructure needed to ensure that the Council’s living locally, 20-minute neighbourhood, and placed based strategy ambitions are met.
34. The explanatory text of Policy 2 sets out the housing, retail and employment requirements in the borough for the plan period. These matters are covered in more detail in specific policies later in the Plan. In particular Policy 10 sets out how, the Council will meet the London Plan’s housing requirement of 4,110 new homes or 411 new homes per year for the borough. As the plan period extends beyond the 10-year housing requirement set out by the London Plan the RuTLP carries forwards the housing requirement of 306 new homes per annum beyond 2032 to establish a housing requirement for the 15-year plan period (2024 – 2039) of 5,928 new homes. Policies 17 to 25 set out how the borough’s retail and employment needs will be addressed.

35. To ensure that Policy 2 is effective **MM7** corrects an error in the supporting text and reflects the Local Housing Needs Assessment 2023 update (SD-056) which identifies a need for 284 affordable homes per annum for affordable home ownership. Moreover, to ensure Policy 2 is justified by the available evidence **MM7** inserts updated details to the “Retail Needs” section of the supporting text highlighting an overall undersupply of some 2,400 sqm gross floorspace. This predominantly relates to an imbalance between an oversupply of convenience and comparison retail and a projected shortfall in food/beverage floorspace over the plan period. This projected shortfall was explored during the examination hearings. However, given the dynamic nature of the retail sector we are satisfied that the RuTLP has the necessary flexibility to address the projected shortfall in food/beverage provision through site specific development proposals as they come forward.

## Conclusion

36. Subject to the MMs identified above the Plan’s Spatial Development Strategy is based on robust evidence, justified, and is in 'general conformity' with the London Plan. The proposed strategy provides a positive framework to direct and support the delivery of a minimum of 5,928 new homes in the plan period (2024 – 2039).

## **Issue 2 – Whether the Place-based Strategies and Site Allocations of the Richmond upon Thames Local Plan are justified, in 'general conformity' with the London Plan, and are likely to be effective?**

37. Chapter 5 Places of the Plan divides the borough into nine high-level ‘places’ that are based on categorisation to reflect the ‘sense of place’ as well as identifying areas recognised as ‘places’ by local people as part of the Urban Design Study 2023 (UDS). These form the basis for the place-based strategies with the Plan identifying these as Hampton & Hampton Hill, Teddington & Hampton Wick, Twickenham, Strawberry Hill & St Margarets, Whitton & Heathfield, Ham, Petersham & Richmond Park, Richmond & Richmond Hill, Kew, Mortlake & East Sheen and Barnes.
38. We carefully considered representations about how the plan divides up places and if the plan provided the requisite level of detail. In the interests of effectiveness **MM5** clarifies that the Place-based strategies are Policies and adds a specific Policy reference for each Place-based strategy. This is so that it is clear to the decision maker, ensuring that the Plan is effective.

## Place based strategies and site allocations

39. The RuTLP contains 38 site allocations that are spread across 8 of the 9 high-level 'places' identified within the borough. The vast majority of these are relatively small sites and form places such as former telephone exchanges, supermarket car parks, police stations, community centres and so on, as well as some larger, more strategic sites such as sporting venues, employment and retail land. It is proposed that the site allocations will contribute towards the delivery of a minimum of 5,928 new homes in the plan period, along with contributing to evidenced need for employment, commercial, retail, social and community infrastructure.

### Hampton & Hampton Hill

40. This area contains the Hampton Historic Centre, Hampton Waterworks, Hampton Court and Bushy Park, identified as areas A1 to A5 within the UDS. The setting of the area is largely defined by its river frontage with the Thames and the Longford, with the open spaces of Bushy and Home Parks. The UDS recognises Hampton Historic Centre, Hampton Waterworks, Hampton Court and Bushy Park, and Hampton Hill Residential as having a high sensitivity to change. There are five site allocations within this area.
41. To ensure that the site allocations within Hampton & Hampton Hill are effective, **MM8** modifies Site Allocation 2: Platts Eyot to clarify the existing land uses to include a dwelling (C3). **MM9** modifies the text to Site Allocation 4: Car Park for Sainsbury's so it is clear that parking provision will be expected to be in line with the London Plan. **MM10** also modifies Site Allocation 4 to ensure that it is clear to the decision maker and that the policy is effective by ensuring that a minimum 10% Biodiversity Net Gain is required for any new development at the allocation, as a consequence of MMs to Policy 39.

### Teddington & Hampton Wick

42. This area encompasses Teddington Town Centre and the residential areas of Teddington and Hampton Wick, identified as areas B1 to B3 within the UDS. The area is defined by its setting to Bushy Park and Hampton Court to the south and the Thames to the north and east. The UDS recognises that Teddington Town Centre, Teddington Residential, and Hampton Wick Residential have a high sensitivity to change. There are four site allocations within this area.
43. For effectiveness and to ensure clarity for the decision maker in relation to development proposals on site allocations within Teddington & Hampton

Wick **MM11** modifies Site Allocation 6: Teddington Telephone Exchange and **MM12** modifies Site Allocation 7: Teddington Delivery Office by updating the text to refer to the latest Retail & Leisure Needs Study – Update Addendum (April 2024).

## **Twickenham, Strawberry Hill & St Margarets**

44. This area contains Twickenham Town Centre and Green, Twickenham Residential, and Twickenham Riverside, along with the residential areas of St Margarets and East Twickenham, and Strawberry Hill and Fulwell and West Twickenham Residential. The UDS identifies the areas as C1 to C7. This area has a green, leafy character with many areas of scenic value, including the Thames Path. Twickenham is recognised as a district centre in the London Plan. The UDS recognises that overall large parts of this area have a high sensitivity to change. There are ten site allocations in this area.
45. **MM13** modifies Site Allocation 10: St. Mary’s University by correcting a factual error relating to the Grade of the designated heritage asset which is Grade II and not Grade I. To ensure it is effective, **MM14** modifies Site Allocation 13: Twickenham Stadium to ensure coach parking and servicing facilities are provided in accordance with the London Plan.

## **Whitton & Heathfield**

46. This area contains Whitton and Heathfield Residential and Whitton High Street identified as areas D1 and D2 within the UDS. Whitton and Heathfield are to a limited degree isolated from the rest of the borough as a result of heavy traffic on the A316 and by the River Crane. The UDS recognises that Whitton and Heathfield has a medium sensitivity to change, with some areas having a high sensitivity. Whitton High Street has a medium sensitivity to change. There are three site allocations in this area.
47. To ensure that the site allocations within Whitton & Heathfield are effective, **MM15** modifies Site Allocation 22: Whitton Community Centre within the Place-based Strategy for Whitton & Heathfield to ensure it accurately refers to the existing community centre and pharmacy use. This approach is considered justified so that it is clear to the decision maker what the existing use of the site is, and to ensure that the Plan is effective. **MM16** and **MM17** modify Site Allocation 21: Kneller Hall, to update and reflect Appendix 4 of the Plan which includes Kneller Hall as a Site of Importance for Nature Conservation (SINC). For clarity and consistency throughout the Plan, **MM18** also amends Site Allocation 21 to cross reference Policy 39, and confirming the site’s designation as a SINC and ensures that the character of the Metropolitan Open Land is protected.

48. For effectiveness **MM19** modifies Site Allocation 22: Whitton Community Centre and corrects typographical errors in the text and deletes a paragraph that incorrectly relates to Kew Gardens Station and its environs. **MM20** also modifies Site Allocation 22 by correcting the first sentence which contains inaccuracies in the description of the building whilst **MM21** amends the first bullet point to ensure that the importance of the building’s use as a community centre is recognised and to ensure its reprovision through any redevelopment of the site. **MM22** also clarifies that there are a range of social and community uses in the immediate area of Site Allocation 22. This approach is considered justified so that it is clear to the decision maker what the existing use of the site and immediate area, and to ensure that the Plan is effective.

### **Ham, Petersham & Richmond Park**

49. This area contains Ham and Petersham Residential, Ham Common and Riverside, and Richmond Park identified as areas E1 to E3 within the UDS. The area is defined by its setting on the bend of the river Thames and a broad belt of open land including Petersham and Ham Commons. The UDS recognises that the Ham and Petersham Residential, Ham Common and Riverside, and Richmond Park have a high sensitivity to change. There are two site allocations in this area.

### **Richmond & Richmond Hill**

50. This area contains Richmond town centre and riverside, and the residential and mixed-use areas into Richmond Hill and North Sheen, identified as areas F1 to F3 within the UDS. Richmond’s character is defined by its location on the river Thames and its historic built environment. The UDS recognises that Richmond Town Centre, and Richmond and Richmond Hill have a high sensitivity to change, whilst North Sheen Residential has a medium sensitivity to change. There are six allocations in this area.
51. For clarity, and to ensure that the site allocations within Richmond & Richmond Hill are effective, **MM23**, **MM24**, and **MM25** modify the Place-based Strategy for Richmond & Richmond Hill, Site Allocation 25: Richmond Station, and Site Allocation 26: Former House of Fraser, respectively, by updating the text directing the decision maker to the latest Retail & Leisure Needs Study – Updated Addendum (April 2024). **MM26** corrects the Public Transport Accessibility Level (PTAL) rating for Site Allocation 30: Sainsbury’s, Lower Richmond Road to 4/good.

## Kew

52. Kew is enclosed on two sides by the River Thames and contains large open spaces at Old Deer Park and the Royal Botanical Gardens. This area also contains Kew Residential and East Kew Mixed Use, identified as areas G1 to G3 in the UDS. Kew Gardens and Riverside, and Kew Residential have a high sensitivity to change whilst East Kew Mixed Use has a medium sensitivity to change. There are four allocations in this area.
53. To ensure that it is clear to the decision maker, **MM27** corrects the PTAL rating for Site Allocation 31: Kew Retail Park to include 2/poor in the range. To ensure that it is effective, **MM28** modifies the text to Site Allocation 31 to allow consideration of the impact of additional retail floorspace where a Retail Impact Assessment is required with reference to Policy 18(g).
54. For clarity and to ensure that the Plan is effective, **MM29** modifies Site Allocation 31 by updating the text to reflect the Playing Pitch and Outdoor Sport Strategy 2023.

## Mortlake & East Sheen

55. This area is predominantly residential, sitting between the River Thames and Richmond Park. It contains the areas of East Sheen Town Centre, East Sheen Residential and East Sheen Parkside, along with Mortlake Residential and Mortlake Riverside. These are identified as areas H1 to H5 within the UDS and have a high sensitivity to change. There are four allocations in this area.
56. For effectiveness **MM30** modifies Site Allocation 35: Stag Brewery by updating the text to remove reference to the site being part of an “Area of Mixed Use” which is incorrect as this designation is not being taken forward in the Plan. For effectiveness, **MM31** modifies Site Allocation 37: Telephone Exchange at Upper Richmond Road by updating the explanatory text to direct the decision maker to the latest Retail & Leisure Needs Study – Updated Addendum (April 2024).

## Barnes

57. This area encompasses Barnes Centre and Riverside, the residential areas of Barnes Bridge and Barnes Common, identified as areas I1 to I5 within the UDS. These areas have a high sensitivity to change. There are no specific site allocations within the Barnes area.

## Conclusion

58. Subject to the MMs identified above the Plan's Place Based Strategies and Site Allocation Policies are based on robust evidence, are justified, and in 'general conformity' with the London Plan and as such they are likely to be effective in making a valuable contribution towards the delivery of a minimum of 5,928 new homes in the plan period, along with the evidenced need for employment, commercial, retail, social and community infrastructure.

## Issue 3 – Whether the Policies of the Richmond upon Thames Local Plan are justified, in 'general conformity' with the London Plan, and are likely to be effective?

59. The RuTLP contains 55 Policies that deal with responding to the climate emergency, delivering new homes, supporting town and local centres, increasing jobs and helping business to grow, heritage and culture, biodiversity and the quality of green and blue spaces, design and high-quality places, reducing the need to travel and improving choices for more sustainable travel, securing new social and community infrastructure, and creating safe, healthy and inclusive communities which seek to provide clear direction for the decision maker in relation to development proposals within the borough.

### Responding to the climate emergency and taking action (Policies 3 to 9)

60. There are seven policies that seek to provide clear direction in relation to responding to the climate emergency and taking action within the borough. The policies seek to cut carbon, waste, and pollution and the Council's Climate Emergency Strategy sets out its five priority areas (air, waste reduction, water, nature, and energy efficiency). This sets out how the Council will reduce emissions to reach net-zero carbon by 2043, minimising waste that goes to landfill, and ensuring that developments are resilient to flooding and heat.
61. Policy 3 Tackling the Climate Emergency and Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency are strategic policies that seek to promote zero carbon development with the aim that all buildings and infrastructure will be net-zero carbon by 2043 at the latest.
62. **MM32** modifies Policy 3 and inserts "*and water*" at part D, so that it is clear to the decision maker that improvements to the energy and water efficiency of a building is required to ensure that all building operations respond to climate change. This approach is considered justified and ensures that the Plan is effective. To ensure that it remains effective, **MM33** modifies Policy 4



D.5 so that it refers to the correct requirements of Part O of the Building Regulations.

63. Policy 5 Energy Infrastructure is a strategic policy that requires developments to prepare an Energy Statement in accordance with the Mayor’s Energy Planning Guidance and that new developments connect to any existing decentralised energy network, where feasible. Policy 6 Sustainable Construction Standards requires all developments to achieve the highest standards of sustainable design and construction.
64. **MM34** modifies Policy 6 through the insertion of additional text at part A.4 to clarify the approach to the water consumption target and water efficiency standards, in line with the Building Regulations optional requirement. This approach is considered justified so that it is clear to the decision maker what the targets and standards are and ensures that the Plan is effective.
65. Policy 7 Waste and the Circular Economy seeks to ensure that waste is managed in accordance with the principles of the circular economy. Policy 8 Flood Risk and Sustainable Drainage is a strategic policy which seeks to ensure that developments are made safe for their lifetime and clearly demonstrate that they avoid or reduce contributing to all sources of flooding.
66. **MM35** to **MM44** modify Policy 8 so that it captures the latest technical advice from the Environment Agency and to ensure that it is effective. This includes removing the word “*minimise*” from part A (**MM35**) so that developments avoid or reduce contributing to all sources of flooding, inserting additional text to part B so that it is clear to the decision maker that proposals must provide mitigation and resilience against flood risk (**MM36**), and modifying the text at part D so that the approach to flood storage is effective (**MM37**).
67. **MM38** modifies Policy 8 part H with the insertion of additional text to clarify run-off rates as one of the most important factors in terms of flood risk and **MM39** seeks to modify part J to reference the latest Thames Estuary 2100 Plan and to future-proof the policy against subsequent updates. **MM40** modifies part L by replacing “*central*” with “*appropriate*” in reference to climate change scenarios to allow flexibility in applying the most relevant climate projections based on the flood zone and the vulnerability classification. **MM41** modifies the supporting text to Policy 8 to clarify the drainage hierarchy.
68. **MM42** modifies the supporting text to Policy 8 to reference the Riverside Strategy Approach set out in the Thames Estuary 2100 Plan, **MM43** adds a new paragraph stating that support for strategic flood alleviation measures

(and associated enabling work) will be supported. **MM44** clarifies that the functional floodplain is defined as land riverward of the Thames Tidal Flood Defences. In reaching this conclusion we have carefully considered the representations of local interested parties in relation to their views on the reclassification of islands within the River Thames, including Eel Pie Island, as part of the functional floodplain. However, in line with the PPG the Council has followed the approach that the identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters, which is supported by the Environment Agency. Therefore, the modifications to Policy 8 are necessary to ensure that the Plan is effective.

69. Policy 9 Water Resource and Infrastructure is a strategic policy that seeks to protect the borough’s water resources from development that poses a threat to rivers, surface water and groundwater quality and quantity.
70. **MM45** modifies Policy 9 by moving the subtitle “*Water Quality*” above part B to its correct position above part C, so it is clear to the decision maker which part of Policy 9 the term relates to. **MM46** also modifies Policy 9 for effectiveness and so that it is clear to the decision maker how infrastructure upgrades to water supply and sewerage may be secured. **MM47** modifies Policy 9 to ensure that the decision maker is aware that the Thames Water region, which includes the borough, is a water stressed area. These three modifications ensure that the policy is effective.

## Conclusion

71. For the reasons above, subject to the main modifications we have identified the Plan’s approach to responding to the climate emergency and taking action (Policies 3 to 9) are justified, are in 'general conformity' with the London Plan, and are likely to be effective.

## **Delivering new homes and an affordable borough for all (Policies 10 to 16)**

72. The delivering new homes and an affordable borough for all chapter of the Plan sets out the housing requirement for the borough for the plan period. The chapter also contains another six policies that seek to provide clear direction in relation to the delivery of affordable housing, meeting the needs of different groups, housing mix and standards, the loss of housing, infill and backland development, and small sites.
73. The PPG sets out how a ‘stepped’ housing trajectory may be appropriate where there is to be a significant change in the level of housing proposed

relative to an existing plan, or where phased delivery is required.<sup>2</sup> The London Plan also states that the increase in housing delivery required by the housing targets may be achieved gradually, and boroughs are encouraged to set out a realistic and, where appropriate, stepped housing delivery target over a ten-year period.<sup>3</sup>

74. The Council has set out its approach to housing delivery<sup>4</sup>, fully accepting that there will be shortfalls in initial years which will be balanced against the considerable increase expected in small sites delivery, whereby there will be a time lag for the change in policy context, with some larger sites expected to deliver in later years. This will also allow the Council to progress sites without compromising the priority of delivering affordable housing. The borough has a number of constraints such as large swathes of protected parks, a high quantum of open space designations and conservation areas, and very few large-scale development sites. Consequently, there is a heavy reliance on small sites to provide the level of housing required across the borough.
75. Policy 10 New Housing is a strategic policy that sets out how the Council will meet the London Plan’s 10-year housing requirement of 4,110 net housing completions. The plan period extends beyond the 10-year housing requirement set out by the London Plan and the RuTLP carries forward the housing requirement of 306 new homes per annum beyond 2032 to establish a housing requirement for the 15-year plan period (2024 – 2039) of 5,928 new homes. The policy also identifies in Table 17.1 the locations where housing is likely to come forward to contribute to meeting the identified housing need.
76. For effectiveness and to ensure that it is clear to the decision maker, **MM48** modifies Part A to Policy 10 by setting out the details of the stepped trajectory from 2024-2039. **MM48** also modifies paragraph 17.1 by correcting the years the periods cover, paragraph 17.2 through the removal of the text “*delivery of 411 homes per annum*” and replacing it with “*proposed housing delivery over the plan period*” to ensure that the requirement of Policy H1 of the London Plan is achieved.
77. **MM48** also modifies paragraph 17.4 replacing “This” with “It” in reference to compliance with the NPPF, and paragraph 17.5 by including reference to the stepped trajectory and how it will inform the basis of the monitoring framework and become part of future Housing Delivery Test (HDT) calculations. This is carried through paragraphs 17.11 through the removal

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<sup>2</sup> Paragraph: 012 Reference ID: 68-021-20190722

<sup>3</sup> Paragraph 4.1.10

<sup>4</sup> Background Paper – Housing Delivery, 20 October 2023

of out-of-date HDT results and paragraph 17.12 with explicit reference to the stepped trajectory informing future HDT calculations. These modifications are all considered necessary to make the Plan sound.

78. Having considered the Council’s approach to housing delivery, we are satisfied that the stepped trajectory as set out within the RuTLP is appropriate for the borough in enabling it to deliver the quantum of housing required to meet the targets set out in the London Plan, whilst still achieving adequate levels of affordable housing.
79. Policy 11 Affordable Housing is a strategic policy that sets out how the Council will require all new housing developments within the borough to provide at least 50% of the total number of habitable rooms as affordable housing on site. Richmond upon Thames has some of the highest house prices in the UK and there is an acute need for affordable homes so that balanced communities across the borough can be achieved. Through Policy 11, homes can be provided for teachers, firefighters, nurses, police officers and so on. Providing genuinely affordable homes for key workers will also assist in meeting the aspirations of Policy 1 Living Locally and the 20-minute neighbourhood. This reduces the need to travel and making communities more resilient in the long term, allowing those that live locally to spend locally, which benefits the local economy and businesses.
80. To ensure that it is effective, **MM49** makes several modifications to Policy 11 and its supporting paragraphs. The following is a breakdown of the modifications that are considered necessary to make the Plan sound and to ensure that it is in ‘general conformity’ with the London Plan Policy H5, to give developers certainty and to aid housing delivery, in the context of constrained land supply.
81. The definitions for affordable housing on page 216 are updated to reflect Rented Affordable homes, along with London Living Rent and Shared Ownership as intermediate homes. So that it is clear to the decision maker, the text for Parts A to D of Policy 11 are modified to set out the Council’s position regarding the provision of affordable housing from developments across the borough. It also sets out that the Council will not accept the loss of any existing affordable homes in accordance with Policy 14.
82. We considered the representations about the difficulties in delivering affordable housing in the context of constraints in the borough, alongside the Council’s ambitions. We had fundamental concerns relating to alignment with Policy H5 of the London Plan through reference to both the fast track and viability tested routes. To align with Policy H5 of the London Plan, Part E is modified further by removing reference to the Viability Tested Route when

considering proposals on major sites capable of providing 10 dwellings or more. When considering proposals via the Viability Test Route **MM49** removes reference to “former employment sites” and inserts reference to Locally Significant Industrial Sites and non-designated industrial land so that it is in compliance with the London Plan. This disaggregates large and small sites, so the broader employment definition at the footnote to Table 17.2 only applies to small sites under part G of the policy. It ensures that the 50% threshold applies only to large sites of industrial land where the development would result in the loss of industrial capacity and sites that are not in industrial use (such as offices or retail) are subject to the 35% threshold.

83. There are also various modifications to the supporting text. Paragraph 17.13 is modified so that it is clear that the Council will do everything to ensure that the 50% affordable housing target is achieved over the plan period. Turning to paragraph 17.16, the Council state that the need for affordable home ownership dwellings is 284 per annum whilst the GLA states that this figure should be 552 affordable homes per annum. However, the figure of 284 is taken from the Local Housing Needs Assessment 2023 (LHNA) which states at paragraph 4.6 that,

*“Since the LHMA was published, Icenl have carried out further research into the potential for resales of existing homes to meet the need for affordable home ownership – this research drawing on a number of published research studies. This identified that typically around half of all lower quartile sales are to First-time Buyers. If this conclusion is applied to LB Richmond, then the net need for affordable home ownership would be calculated to be around 284 homes per annum. This is a reasonable refinement of the information in the LHMA”*

84. It is apparent that the Council has sought to rely upon a more up-to-date evidence base through the LHNA which clearly sets out that there is a revised annual need for 284 affordable home ownership dwellings per annum. Consequently, after carefully considering the evidence before us, we have accepted the revised annual need for 284 affordable homes per annum.
85. There are other consequential modifications to Policy 11 to detail the Fast Track Route so that it refers to Policy H5 of the London Plan which sets out the threshold approach - where if an application is providing at least 35% affordable homes, or 50% in the case of public sector or industrial land, then there is no requirement to submit a viability assessment at application stage, also clarified in the supporting text at paragraph 17.22. Moreover, where applicants follow the Fast Track Route, applicants should ensure they

seek all opportunities to secure grant to maximise the number of affordable homes on site.

86. In addition, where detailed viability evidence is required to ascertain the number of affordable homes a scheme can deliver, this should have regard to, amongst other things, the GLA’s Development Viability London Plan Guidance. **MM49** also modifies the term “low cost rented homes” to “social rented homes”.
87. We consider that the modifications to Policy 11 through **MM49** are necessary to ensure that the Plan is in ‘general conformity’ with the London Plan when seeking to deliver affordable homes across the borough. This approach is considered justified so that it is clear to the decision maker and ensures that the Plan is effective.
88. To ensure that it is effective and so that the policy is in ‘general conformity’ with the London Plan, **MM50** modifies Policy 13 Housing Mix Standards so that it refers to the correct Housing Design Standards London Plan Guidance June 2023.
89. Policy 14 Loss of Housing seeks to retain existing housing while setting out how conversions and redevelopment would be assessed, recognising the need to optimise use of land. Policy 15 Infill and Backland Development sets out the approach towards infill, backland and back garden development. Policy 16 Small Sites seeks to support the delivery of housing on small sites, to reflect the emphasis in the London Plan Policy H2. Areas for incremental intensification, as defined in the London Plan, are identified on the Policies Map.

## Conclusion

90. For the reasons above, the Plan’s approach to delivering new homes and an affordable borough for all (Policies 10 to 16) is sound subject to the main modifications we have identified. The Plan will support the delivery of 5,928 new homes to meet the needs of the residents of the London Borough of Richmond upon Thames. Therefore, the policies are justified, are in ‘general conformity’ with the London Plan, and are likely to be effective.

## **Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic (Policies 17 to 20)**

91. There are four policies that seek to provide clear direction in relation to supporting the borough’s centres and promoting culture, development in

centres, managing the impacts of development on surroundings, and shops and servicing essential needs.

92. Policy 17 Supporting our Centres and Promoting Culture is a strategic policy that seeks to support centres and promote culture through shopping, leisure, and culture uses, providing spaces for business and services and promoting community and cultural exchanges which contribute towards the viability and vitality of the centres. The policy directs development to the principal centre of Richmond and the four district centres of Twickenham, Teddington, East Sheen, and Whitton, supporting proposals which contribute to the day and night-time economy, and protecting existing employment land within designated employment areas. Up to date town centre boundaries and local centre boundaries (defined for local centres, neighbourhood centres and Important Local Parades) are identified on the Policies Map. The policy approach has been informed by the evidence base. To ensure that it is effective, **MM51** modifies the supporting text to Policy 17 so that the latest evidence from the Retail & Leisure Needs Study – Update Addendum (April 2024) (PSED-02) is referred to.
93. Policy 18 Development in Centres relates to developments in centres specifically for community, healthcare, educational, and cultural uses which will be supported in the borough’s designated centres. Designated Primary Shopping Areas and Cultural Quarters are identified on the Policies Map. To ensure consistency with Policy 17 and for effectiveness **MM52** modifies Policy 18 part C to include ‘*or site allocation meeting the requirements of Policy 17 A.2*’ which requires compliance with the sequential tests set out within the NPPF for major new development for retail, leisure, and business uses.
94. Policy 19 Managing the Impacts of Developments on Surroundings seeks to manage the impacts of development on surroundings ensuring that proposals that contribute to cultural and creative activities during the day and night-time are appropriate to their location, the hours of operation, and nature of the area.
95. **MM53** modifies Policy 19 through the insertion of additional text at part A.2 to widen the application of the policy to uses beyond those with late licences, and to include other existing noise or nuisance-generating business or community activity when considering proposals for new residential properties. This approach is considered justified so that it is broadly consistent with Policy D13 of the London Plan, therefore ensuring that the Plan is effective.

96. **MM54** also modifies Policy 19 through the insertion of additional text at part D to clarify that the list of uses as detailed therein is not exhaustive when considering the over-concentration of similar uses when managing the impacts of a development on its surroundings. This approach is considered justified so that it is clear to the decision maker and ensures that the Plan is effective.
97. Policy 20 Shops and Services Serving Essential Needs supports shops and services serving essential needs which meet the day-to-day needs of communities.
98. For clarity and to ensure that the Policy is effective, **MM55** modifies the supporting text to Policy 20 so that it is clear that the definition of essential shops and services not only applies to businesses with a significant proportion of floorspace selling goods, but also applies to where the existing or last use of the premises was selling essential goods or providing an essential service.

## Conclusion

99. For the reasons above, subject to the main modifications we have identified the Plan's approach to supporting our town and local centres (Policies 17 to 20) are justified, are in 'general conformity' with the London Plan, and are likely to be effective.

## **Increasing jobs and helping business to grow and bounce back following the pandemic (Policies 21 to 27)**

100. There are seven policies that seek to provide clear direction in relation to protecting the borough's local economy, promoting jobs, for offices and industrial land, affordable, flexible and managed workspaces, the visitor economy, and telecommunication and digital infrastructure.
101. Policy 21 Protecting the Local Economy is a strategic policy that seeks to protect the local economy through the retention and attraction of investment from existing and emerging sectors whilst Policy 22 promotes new jobs through the support of new floorspace that supports suitable workspace for the borough's locally significant and diverse sectors. We considered the representations on the policy approach related to sector and/or site-specific conditions. The RUTLP makes adequate provision to meet economic growth requirements for the plan period, based on the evidence base. For clarity and to ensure that the Policy is effective, **MM56** modifies Policy 22 part D with reference to Policy D13 of the London Plan when considering the design and layout of development and the Agent of Change. This approach is



considered justified so that it is clear to the decision maker and ensures that the Plan is effective.

102. Policy 23 Offices supports a presumption against the loss of office space in all parts of the borough and the creation of appropriate new office spaces. Designated Key Business Areas, as updated, are identified on the Policies Map.
103. Policy 24 Industrial Land supports the retention of industrial space with a presumption against its loss, and the support for appropriate new industrial space across the borough. Locally Important Industrial Land and Business Parks, as updated and identified on the Policies Map, are designated as Locally Significant Industrial Sites (LSIS) to accord with the London Plan Policy E7. For effectiveness **MM57** modifies the supporting text to Policy 24 by adding reference to the Consultation Draft Industrial Land and Uses London Plan Guidance which provides guidance on the assessment of development proposals for intensification and co-location considerations.
104. Policy 25 Affordable, Flexible and Managed Workspace seeks to protect existing affordable workspace with any loss re-provided in perpetuity and requires the provision of new affordable workspace within major developments with over 1000sqm of employment floorspace (gross). Policy 26 Visitor Economy supports the sustainable growth of the visitor economy for the benefit of the local area.
105. Policy 27 Telecommunications and Digital Infrastructure is a strategic policy that promotes the enhanced connectivity of high speed and full fibre broadband, along with the 5G mobile network. So that it is clear to the decision maker and to ensure that the Plan is effective **MM58** modifies the supporting text to Policy 27 to include reference to the Digital Connectivity Infrastructure London Plan Guidance which provides guidance on key requirements for development to support digital connectivity.

## Conclusion

106. For the reasons above, subject to the main modifications we have identified the Plan's approach to increasing jobs and helping businesses grow (Policies 21 to 27) are justified, are in 'general conformity' with the London Plan, and are likely to be effective.

**Protecting what is special and improving our areas (heritage and culture)  
(Policies 28 to 33)**

107. There are six policies that seek to provide clear direction in relation to protecting the Borough’s local character and design quality, designated and non-designated heritage assets, views and vistas, and the Royal Botanic Gardens at Kew World Heritage Site.
108. Policy 28 Local Character and Design Quality is a strategic policy that requires all development to be of a high standard, taking into account the character and heritage of the borough. For clarity and effectiveness, **MM59** modifies the supporting text to Policy 28 by deleting the sub heading to paragraph 20.3 and deleting paragraph 20.4. This is considered justified as the formal programme for prioritising reviews of the borough’s Conservation Areas ended in 2023.
109. Policy 29 Designated Heritage Assets requires all developments to conserve and take opportunities to make a positive contribution to the historic environment of the borough. **MM60** inserts additional text to ensure consistency between Policy 29 E and the supporting text at paragraph 20.31 to reference when outline planning applications in Conservation Areas may be accepted. This approach is considered justified to ensure that it is clear to the decision maker and for effectiveness.
110. Policy 30 Non-designated Heritage Assets seeks to ensure that developments conserve or enhance the significance, character and setting of such assets. For clarity and to ensure it is effective, **MM61** modifies the supporting text to Policy 30 so it is clear that the Council will use the London Historic Parks and Gardens Trust inventory as a basis for considering locally listing parks and gardens.
111. Policy 31 Views and Vistas seeks to protect the quality of identified views, vistas, gaps and the skyline which contribute to the character and distinctiveness of the local and wider area. The views as identified on the Policies Map include a number of new local views that have been identified, based on the Urban Design Study (UDS) as well as responses to public consultation on the draft Local Views Supplementary Planning Document. **MM62** modifies the supporting text to Policy 31 so it is clear to the decision maker that the Council’s Local Views Supplementary Planning Document is not part of the examination and will be finalised following the adoption of the RuTLP.
112. Policy 32 Royal Botanic Gardens, Kew World Heritage Site seeks to protect, conserve, promote and where appropriate, enhance the Royal Botanical Gardens at Kew, whilst Policy 33 Archaeology seeks to protect, enhance and

promote archaeological heritage. For effectiveness **MM63** modifies the supporting text to Policy 33 to specifically reference early involvement of the Greater London Archaeological Advisory Service.

## Conclusion

113. For the reasons above, subject to the main modifications we have identified the Plan's approach to protecting what is special and improving our areas (heritage and culture) (Policies 28 to 33) are justified, are in 'general conformity' with the London Plan, and are likely to be effective.

## **Increasing biodiversity and the quality of our green and blue spaces, and greening the borough (Policies 34 to 42)**

114. There are nine policies that seek to provide clear direction in relation to protecting the borough's Green and Blue infrastructure, its Green Belt and Metropolitan Open Land and Local Green Space, other Open Land of Townscape Importance, public open space, play, sport and recreation. The policies also seek to promote urban greening, protecting and enhancing biodiversity and geodiversity and protecting its rivers and river corridors, moorings and floating structures, trees, woodlands and landscape.
115. Policy 34 Green and Blue Infrastructure is a strategic policy that seeks to protect and appropriately enhance and restore the borough's green and blue infrastructure whilst Policy 35 Green Belt, Metropolitan Open Land and Local Green Space seeks to protect and retain the land designated as such in predominantly open use. Updates to designations for Metropolitan Open Land and Local Green Space are identified on the Policies Map. During the hearing session, concerns were raised about some site-specific designations, however the Council's approach has been based on the evidence base, including to justify the removal of MOL from limited parcels along Hampton Court Road and the Car Park for Sainsburys, Uxbridge Road. For effectiveness, **MM64** modifies the supporting text to Policy 35 by reintroducing a footnote that appeared in the Regulation 18 Plan but was omitted in error from the Regulation 19 submission Plan. The paragraph is required as it makes it clear to the decision maker that the land at Twickenham and Fulwell golf course is held under The Green Belt (London Home Counties) Act 1938.
116. Policy 36 Other Open Land of Townscape Importance seeks to protect in open use, or enhance, land in this designation and Policy 37 Public Open Space, Play, Sport and Recreation seeks to protect, and where possible, enhance public open space, play facilities as well as formal and informal sports grounds. Updated Other Open Land of Townscape Importance designations are identified on the Policies Map. For effectiveness, **MM65** has

been updated in 2023 and modifies the reference to the Playing Pitch and Outdoor Strategy in the supporting text to Policy 37 to reflect the latest version of the evidence base. The Public Open Space deficiency areas identified on the Policies Map reflect the evidence base. Updated Public Open Space designations are identified on the Policies Map.

117. Policy 38 Urban Greening is a positively worded policy that promotes the integration of green infrastructure to provide urban greening within developments.
118. Policy 39 Biodiversity and Geodiversity seeks to protect and enhance the borough’s biodiversity and geodiversity. We have carefully considered the local circumstances and concerns about the impact on feasibility and deliverability of the requirement to provide a minimum 20% Biodiversity Net Gain, alongside other requirements, in the context of the PPG. **MM66** modifies Policy 39 and its supporting text to ensure that it is clear to the decision maker and so that the policy is effective, for the developments listed therein, a minimum 10% Biodiversity Net Gain is required to align with the national requirement in the Environment Act.
119. **MM67** modifies Policy 39 to remove the reference to small scale householder applications and other minor developments that are exempt from Biodiversity Net Gain, as national guidance and regulations now set out exempt categories of development. **MM68** modifies Policy 39 and its supporting text by deleting the reference to removing permitted development rights from new developments. The modification ensures that any proposed removal of permitted development rights will be considered on a case-by-case basis during the development management process rather than a blanket approach through the local plan. These modifications ensure that the Policy 39 is justified and consistent with national policy. For effectiveness **MM89** is a consequential modification to update Appendix 4 to reflect the updated evidence published in 2023 in the Review of Sites of Importance for Nature Conservation, and other updates including to correct discrepancies against the Greenspace Information for Greater London (GiGL) records.
120. Policy 40 Rivers and River Corridors seeks to protect the natural, historic and built environments of the borough’s watercourses. To ensure that Policy 40 is effective, **MM69** adds reference to water quality to ensure that development meets the objectives of the Water Framework Directive. To ensure that it is effective and that it is clear to the decision maker, **MM70** also modifies the supporting text to Policy 40 by adding reference to the preference for naturalised riverbanks when dealing with applications.

121. **MM71** modifies the supporting text to Policy 40 by inserting a new paragraph relating to the river element of the Biodiversity Net Gain metric set out in Policy 39. This is considered justified to ensure the policy is effective and for continuity throughout the Plan.
122. Policy 41 Moorings and Floating Structures states that 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.
123. Policy 42 Trees, Woodland and Landscape requires the protection of existing trees and the provision of new trees in accordance with Policy G7 of the London Plan, as well as other hedgerows, shrubs, and other vegetation of landscape significance that complement existing, or create new, high quality green elements, which deliver air quality, climate change, amenity and biodiversity benefits.

## Conclusion

124. For the reasons above, subject to the main modifications we have identified the Plan's approach to increasing biodiversity and the quality of our green and blue spaces and greening the borough (Policies 34 to 42) are justified, are in 'general conformity' with the London Plan, and are likely to be effective.

## **Improving design, delivering beautiful buildings and high-quality places (Policies 43 to 46)**

125. There are four policies that seek to provide clear direction in relation to the provision of floodlighting and other external lighting, optimising site capacity through the design process, the provision of tall and mid-rise buildings zones within the borough, and the amenity and living conditions of the borough's inhabitants.
126. Policy 43 Floodlighting and other External Artificial Lighting permits such lighting, where it can be demonstrated that there will not be unacceptable harm to character, biodiversity or amenity and living conditions. Policy 44 Design Process seeks to make the most efficient use of land by optimising site capacity through a design-led approach.
127. Policy 45 Tall and Mid-Rise Building Zones sets out the criteria for assessing tall and mid-rise building proposals within the identified Tall and Mid-Rise Building Zones. The policy permits proposals for tall buildings within the Tall Building Zones identified, provided they do not result in any adverse visual,

functional, environmental, or cumulative impacts. It then lists the criteria that should be addressed. The policy also sets out the criteria that should be addressed for mid-rise buildings in identified zones. Mid-rise buildings may be permitted outside of the zones identified, subject to design and context criteria outlined in the policy.

128. The London Plan states that boroughs should determine if there are locations where tall buildings may be an appropriate form of development, which should be identified on maps in Development Plans. Furthermore, tall buildings should only be developed in locations that are identified as suitable in Development Plans.
129. In accordance with Policy D9. A of the London Plan, Policy 45 of the RuTLP sets out what constitutes a tall and mid-rise building within the definitions section of the policy. In accordance with Policy D9. B 2), Policy 45 also clarifies that such buildings will only be appropriate in the tall building zones identified on the diagram provided at Appendix 3 of the RuTLP. Policy 45 also sets out the design criteria such buildings would be assessed against when considering the visual impacts of a proposed tall building, its spatial hierarchy and those tall buildings that would near the river Thames frontage.
130. In assessing the areas where tall buildings would be appropriate, the RuTLP draws upon the Urban Design Study 2023 (UDS) as a benchmark for, amongst other things, setting out where tall and mid-rise buildings will be appropriate. We considered the representations on this policy, including the heights specified for certain sites across the borough. The UDS is a proportionate and robust response to identifying tall building zones and as an overarching policy document; it would be unreasonable to expect it to provide in-depth and specific details for each site across the Borough.
131. Thus, Policy 45 is informed by the UDS which seeks to identify areas that are appropriate for tall buildings, highlighting local context and the importance of heritage constraints such as Conservation Areas. The submission Plan clearly identifies what a tall and mid-rise building is and Appendix 3 sets out the zones where they will be appropriate. The Council will seek to restrict tall buildings outside the identified tall building zones.
132. For effectiveness and clarity, **MM72** modifies Policy 45 by deleting “*respect*” and inserting “*avoid harm to*” when considering the effects of a tall building towards views and vistas of heritage assets across the Borough and neighbouring Boroughs. To ensure that it is effective, and in general conformity with the London Plan, **MM73** modifies Policy 45 which currently states that tall buildings “*will not be permitted outside the identified Tall Building Zones*” so it reads that tall buildings “*will be resisted outside of the*

*Tall Buildings Zones*”. It also inserts a new explanatory paragraph into Policy 45 to clarify that there is a presumption against tall buildings outside of tall building zones identified in Appendix 3.

133. **MM74, MM87 and MM88** modify the supporting text to Policy 45 to clarify that the red areas depicted within Appendix 3 show areas that are appropriate for tall buildings and orange areas show areas suitable for mid-rise buildings. Consequentially, the Council made improvements to the mapping in Appendix 3, which do not change any boundaries of the tall and mid-rise building zones but add clarity. **MM75** modifies the supporting text to Policy 45 to clarify and to ensure that it is clear to the decision maker, along with developers to consult the Government’s latest fire safety advice for high rise residential buildings, and the requirement for two staircases within such buildings.
134. Policy 46 Amenity and Living Conditions requires all developments to protect the amenity and living conditions for occupants of existing, adjoining, and neighbouring properties, and the visual amenity of the area as a whole.

## Conclusion

135. For the reasons above, subject to the main modifications we have identified the Plan’s approach to delivering beautiful buildings and high-quality places (Policies 43 to 46) are justified, are in 'general conformity' with the London Plan, and are likely to be effective.

## Reducing the need to travel and improving the choices for more sustainable travel (Policies 47 and 48)

136. There are two policies that seek to provide clear direction in relation to the Borough’s sustainable travel choices, and vehicular parking standards, cycles parking, servicing and construction logistics.
137. Policy 47 Sustainable Travel Choices is a strategic policy which states that the Council will work with others to bring about safe, sustainable, accessible transport solutions to reduce private car borne trips, reduce congestion and air pollution, improving public health, and improving access to services. We considered representations expressing concern about cumulative impacts and cross-boundary matters, as well as the effectiveness of site-specific mitigation. The thresholds for Transport Impact Assessment are set out clearly in Table 23.1. **MM76** modifies Policy 47 to clarify the requirement for the assessment of major development proposals on the passenger transport network capacity. **MM77** ensures development proposals that impact on the local/strategic road network and parking are evaluated in accordance with

the latest national policy. These modifications ensure that the policy is effective.

138. **MM78** modifies the supporting text to Policy 47 to clarify what is expected in Active Travel Zone Assessments to aid implementation of part C of the policy and to ensure addressed in planning applications. **MM79** also modifies the supporting text to Policy 47 by adding a further paragraph to clarify the potential significant cross-boundary impacts from housing growth on the road and public transport networks will be assessed and any necessary mitigation secured. **MM86** is a consequential modification to the Glossary definition for PTAL so that it consistent with that as set by Transport for London. These modifications will ensure that the Plan is effective.
139. Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management requires new development to make provision for the accommodation of vehicles for the needs of the development whilst minimising the impact of car-based travel on the road network and local environment. For effectiveness and to ensure consistency with national policy and updated guidance, **MM80** and **MM81** modify Policy 48 to refer to latest national and highway authority guidance.

## Conclusion

140. For the reasons above, subject to the main modifications we have identified the Plan’s approach reducing the need to travel and improving the choices for more sustainable travel (Policies 47 and 48) are justified, are in 'general conformity' with the London Plan, and are likely to be effective.

## Securing new social and community infrastructure to support a growing population (Policies 49 and 50)

141. There are two policies that seek to provide clear direction in relation to the borough’s social and community infrastructure, and education and training, to support development.
142. Policy 49 Social and Community Infrastructure is a strategic policy which states that 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. For effectiveness and clarity, **MM82** modifies the supporting text to policy 49 and updates the date for the evidence base on indoor sport to reference the document published in 2025.



143. Policy 50 Education and Training is a strategic policy which states that 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.

## Conclusion

144. For the reasons above, subject to the main modifications we have identified the Plan's approach to securing new social and community infrastructure to support a growing population (Policies 49 and 50) are justified, are in 'general conformity' with the London Plan, and are likely to be effective.

## Creating safe, healthy and inclusive communities (Policies 51 to 54)

145. There are four policies that seek to provide clear direction in relation to the Borough's health and wellbeing, allotments and food growing spaces, local environment impacts, and basements and subterranean developments.
146. Policy 51 Health and Wellbeing is a strategic policy that supports development that promotes healthy lifestyles and reduces health inequalities, including the approach to fast food takeaways. **MM83** modifies the supporting text to Policy 51 for effectiveness and so that it is clear to the decision maker that the London Healthy Urban Development Unit rapid Health Impact Assessment has been superseded in relation to the development of Health Impact Assessments, and suggest that a Health Impact Assessment should be developed early on in the design process from RIBA Stage 1 and community consultation. It provides further direction to the London Healthy Urban Development Unit guidance and their Planning contribution Model in calculating the associated capital costs of additional health facilities.
147. Policy 52 Allotments and Food Growing Spaces seeks to protect existing allotments and supports other potential spaces that could be used for commercial food production or community gardening.
148. Policy 53 Local Environment Impacts seeks to ensure that local environmental impacts of all developments do not lead to detrimental impacts on health, safety of existing and new users or occupiers of a site, and the surrounding land.
149. Policy 54 Basements and Subterranean Developments seeks to resist subterranean and basement development of more than one storey below the existing ground level to residential properties or those that were previously in residential use. **MM84** modifies the wording to Policy 54 part C with the

replacement of the word “assessed” with “considered” to clarify the reference to Supplementary Planning Documents within the policy when considering basements and subterranean developments.

## Conclusion

150. For the reasons above, subject to the main modifications we have identified the Plan’s approach to creating safe, healthy and inclusive communities (Policies 51 to 54) are justified, are in 'general conformity' with the London Plan, and are likely to be effective.

## Implementation, Delivery and Monitoring (Policy 55)

151. There is one policy within the Implementation, Delivery and Monitoring chapter of the RuTLP, it sets out how the Council will ensure delivery, the provision of infrastructure, how it will use planning obligations and Community Infrastructure Levy and a commitment to enforcement against unauthorised development that results in harm.
152. The final section of the policy sets out a monitoring framework for the performance of the Plan and provides most of the necessary evidence on which to assess the success or failure of delivery and what alternatives might reasonably be provided if necessary. The Local Plan Monitoring Framework will be the main mechanism for assessing the Plan’s performance and effect. The Plan contains clear indicators for delivery and the Council’s monitoring regime should ensure that any risks to non-delivery are ‘flagged up’ and interventions made to alleviate risks should this prove necessary.
153. To ensure that the Plan is effective **MM85** modifies the supporting text to Policy 55 so it is clear to the decision maker that all new infrastructure should be to high design standards, taking into account existing site constraints including utilities situated within the site. Therefore, subject to the modification this policy is justified, in ‘general conformity’ with the London Plan, and is likely to be effective.

## Overall Conclusion and Recommendation

154. The Plan has several deficiencies in respect of soundness for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.
155. The Council has requested that we recommend MMs to make the Plan sound and capable of adoption. We conclude that the duty to cooperate has been

met and that with the recommended main modifications set out in the Appendix the Richmond upon Thames Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

*Jameson Bridgwater and Graham Wyatt*

Inspectors

This report is accompanied by Appendix A containing the Main Modifications.

## London Borough of Richmond upon Thames

### Schedule of Main Modifications

The items below are set out in the order of the Local Plan, as identified under the heading ‘Section of the Plan’. The Main Modifications (MM) take the format that proposed additions to the text are recorded in underlined text, and proposed deletions are recorded with a strikethrough.

For example: ‘This text is to be retained and this text is to be added but ~~this text is to be deleted.~~’ All paragraph and policy numbers are referenced according to the submitted version of the Local Plan and will be updated as necessary as part of a final adopted version.

Change Ref.	Section of the Plan	Page	Proposed Modification
MM1	Title page and introduction, paragraph 2.1	1 and 5	<p>Amend title page and add a paragraph in the introduction to make reference to the plan as the Richmond upon Thames Local Plan as follows:</p> <p>On page 1: Richmond <u>upon Thames</u> Local Plan ‘The best for our borough’</p> <p>On page 5: add text following paragraph 2.1: ...<u>This is the plan for the borough of Richmond upon Thames. All subsequent references to the abbreviated ‘Richmond Local Plan’ refer to this boroughwide plan.</u></p>
			<b>Introduction</b>
			<b>Vision and Strategic Objectives</b>

Change Ref.	Section of the Plan	Page	Proposed Modification
MM2	Strategic Vision, second paragraph in the 'vision' box	12	<p>Add additional reference in the strategic vision to reflect Policy 1:</p> <p>Everything a local resident needs can now be reached within 20 minutes by foot or bike. This has been achieved through implementing the 20-minute neighbourhood concept, resulting in a borough with complete, compacted, connected neighbourhoods. Lessons have been learnt from the Covid-19 pandemic, which changed aspects of the way we live, work and connect with each other. Opportunities have been taken to redefine places and retain positive changes, which have increased active travel and use of open spaces, support for local centres and workspaces, and renewed the focus on tackling the climate emergency. All our residents can now 'live locally'; they can easily walk or cycle within 20 minutes to access essential services and fulfil their daily needs, in town and local centres and high streets that provide a range of shops, services, employment opportunities, cultural activities and social connections. <u>Improved access to public transport options aid connections to jobs and places, and have assisted with overcoming barriers for people who experience reduced mobility.</u></p>
MM3	3.3 Strategic Objectives, 6. Increasing biodiversity and the quality of our green and blue spaces, and greening the borough	17	<p>Amend the last bullet point under 'Increasing biodiversity and the quality of our green and blue spaces, and greening the borough':</p> <ul style="list-style-type: none"> <li>• Protect and improve the unique environment of the borough's rivers, especially the River Thames and its tributaries, as wildlife corridors, as flood storage, as opportunities for recreation and river transport; <u>where appropriate</u> increasing access to and alongside the rivers, <u>taking opportunities to use nature flood management techniques</u><del>where appropriate</del>, and gain wider local community benefits and habitat improvements when sites are redeveloped.</li> </ul>
			<b>Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy)</b>

Change Ref.	Section of the Plan	Page	Proposed Modification
MM4	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy), Paragraph 4.8	20	<p>Add reference to the Mayor's Vision Zero Strategy for road safety:</p> <p>The 'living locally' concept relies on inclusive and attractive high streets and public spaces, promoting and encouraging walking, cycling and accessibility for all; this complements the Mayor's Healthy Streets approach as set out in <del>TP2</del> <u>Policy T2</u> of the London Plan. <u>It should also seek to reflect the Mayor's Vision Zero which aims to reduce road danger and create a safer transport environment for all.</u></p>
			<b>Policy 2 Spatial Strategy: Managing change in the borough (Strategic Policy)</b>
MM5	Places/Spatial Strategy, Paragraph 5.2	27, 29, 45, 60, 98, 110, 121, 144, 162, 179	<p>Add policy references for each Place-based policy in the Local Plan:</p> <p>Policy <u>PBS1 Hampton &amp; Hampton Hill</u></p> <p>And each consequential policy to PBS9 (listed here for ease):</p> <p><u>Policy PBS2 Teddington &amp; Hampton Wick</u>  <u>Policy PBS3 Twickenham, Strawberry Hill &amp; St Margarets</u>  <u>Policy PBS4 Whitton &amp; Heathfield</u>  <u>Policy PBS5 Ham, Petersham &amp; Richmond Park</u>  <u>Policy PBS6 Richmond &amp; Richmond Hill</u>  <u>Policy PBS7 Kew</u>  <u>Policy PBS8 Mortlake &amp; East Sheen</u>  <u>Policy PBS9 Barnes</u></p>
MM6	Policy 2 Spatial Strategy Managing change in the borough (Strategic Policy)	22, front cover	<p>Add amendments to the first part of Policy 2:</p> <p><u>The spatial strategy for Richmond upon Thames is for the plan period 2024 to 2039.</u> The overarching aim is to ensure that growth is delivered in a sustainable way...</p> <p>Consider mentioning the plan period of 2024 to 2039 on the front cover produced at adoption.</p>
MM7	Policy 2 Spatial Strategy: Managing change in the	23	Update the supporting text:

Change Ref.	Section of the Plan	Page	Proposed Modification
	borough (Strategic Policy), Paragraph 4.19		<p><i>Housing:</i>... It identifies for affordable rent a need for 1,123 affordable homes per annum across the borough, and a need for <del>552</del> <u>284</u> affordable homes per annum for affordable home ownership ...</p> <p>Update the supporting text:</p> <p><i>Retail needs:</i> Richmond upon Thames Retail &amp; Leisure Study (Phase 2) forecasts that up to 2034, there is an over-supply of 2,900 sqm gross of retail (<u>comparison and convenience</u>) floorspace, and an undersupply of food/beverage floorspace of approximately 5,400 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,500 sqm gross (<u>retail and food/beverage</u>). An Addendum (April 2024) confirms up to 2034 an over-supply of approximately 3,000 sqm gross of retail (<u>comparison and convenience</u>) floorspace is forecast, and an under-supply of food/beverage floorspace of approximately 5,500 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,400 sqm gross (<u>retail and food/beverage</u>). Put simply, the need for shopping space is forecast to decrease but the need to provide space for the food &amp; beverage sector and potentially the wider leisure sector is increasing.</p> <p>And other consequential changes relating to referencing the Update Addendum in place-based strategies, Site Allocations and supporting text across the Plan.</p>
			<b>Site Allocations</b>
			<b>Site Allocation 2 Platts Eyot, Hampton</b>
MM8	Site Allocation 2 Platts Eyot, 'Existing Land Uses' section in Context box	34	<p>Amend the text in the context:</p> <p>Business and employment uses including river-related and river-dependent operations, workshops (Use Class B2/B8), office (Class E(g)), <del>and</del> recording studios (Sui Generis) <u>and dwelling (C3)</u>; carpark</p>
			<b>Site Allocation 4 Car Park for Sainsburys, Hampton</b>
MM9	Site Allocation 4 Carpark for Sainsburys, Uxbridge Road, 5 <sup>th</sup> bullet point	42	<p>Amend the reference to parking in the vision:</p> <p>Parking provision to <del>London Plan standards</del> is expected to be provided including reprovision for the adjacent supermarket <u>in line with London Plan standards</u>.</p>

Change Ref.	Section of the Plan	Page	Proposed Modification
MM10	Site Allocation 4 Car Park for Sainsburys, Hampton, second bullet point	41	Amend the vision:  Any new development would need to provide a minimum of <u>210%</u> measurable Biodiversity Net Gain (BNG) towards restoring and enhancing the ecological habitat quality of the Longford River wildlife corridor running along the southern edge of the site, in order to improve its function and connectivity, in accordance with the Richmond Biodiversity Action Plan.
			<b>Site Allocation 6 Telephone Exchange, Teddington</b>
MM11	Site Allocation 6 Teddington Telephone Exchange, 'Vision' section, first bullet point	51	Update the following text (first bullet point):  There is an expectation that redevelopment provides employment space in this <del>Area of in this</del> town centre <u>boundary location</u> . The Richmond upon Thames Retail & Leisure Study Phase 2 forecasts a surplus of retail <u>(comparison and convenience)</u> floorspace (728 sqm) and a requirement for 839 sqm of food/beverage floorspace by 2034, amounting to a small total requirement <u>(retail and food/beverage)</u> of c. 100sqm (gross) uses for Teddington to 2034. <u>An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study which supersedes earlier forecasting. It suggests that in Teddington there will be a surplus of retail (comparison and convenience) floorspace of 660 sqm and a requirement for 860 sqm of food/beverage floorspace by 2034, resulting in an overall requirement (retail and food/beverage) of only c 200 sqm (gross).</u> Any commercial / retail floorspace should enable the centre to grow and diversify in a way that responds to changes in the retail and leisure industries, providing commercial, business and service uses to serve the local community.
			<b>Site Allocation 7 Teddington Delivery Office, Teddington</b>
MM12	Site Allocation 7 Teddington Delivery Office, 'Vision' section, second bullet point	53	Update the following text (second bullet point):  The Richmond upon Thames Retail and Leisure Study (Phase 2) forecasts a surplus of retail <u>(comparison and convenience)</u> floorspace (728 sqm) and a requirement for 839 sqm of food/beverage floorspace by 2034, amounting to a small total requirement <u>(retail and food/beverage)</u> of c. 100sqm (gross) uses for Teddington to 2034. <u>An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study which supersedes earlier forecasting. It suggests that in Teddington there will be a surplus of retail (comparison and convenience) floorspace of 660 sqm and a requirement for 860 sqm of food/beverage floorspace by 2034, resulting in an overall requirement (retail and food/beverage) of only c 200 sqm (gross).</u> Any commercial / retail floorspace should enable the centre to grow and diversify in a way that responds to changes in the retail and leisure industries, providing commercial, business and service uses to serve the local community.



Change Ref.	Section of the Plan	Page	Proposed Modification
			<b>Site Allocation 10 St Mary's University, Strawberry Hill</b>
MM13	Site Allocation 10 St Mary's University, Strawberry Hill, 'Heritage Assets' section in Context box	66	Correct factual error:  St Mary's College Chapel, Waldegrave Road (Grade II)
			<b>Site Allocation 13 Twickenham Stadium, Twickenham</b>
MM14	Site Allocation 13 Twickenham Stadium, Twickenham, 6 <sup>th</sup> bullet point	77	Amend the reference to parking in the vision:  <del>'There is a need to retain p</del> Parking provision particularly for coaches, servicing facilities and space for spectators and related services, <u>should be</u> in line with London Plan standards <u>and should include coach parking and servicing facilities.</u>
			<b>Place-based Strategy for Whitton &amp; Heathfield</b>
MM15	Place-based Strategy for Whitton & Heathfield	100	Correction:  At Whitton Community Centre (Site Allocation 22) there is an opportunity to reprovide community facilities (the existing <del>day</del> community centre and pharmacy) with affordable housing above, to provide modern facilities for the elderly and wider local community.
			<b>Site Allocation 21 Kneller Hall, Whitton</b>
MM16	Site Allocation 21 Kneller Hall, Whitton 2 <sup>nd</sup> bullet point of 'Access to Open Space/Nature' in 'Context' section	105	Update to reflect Appendix 4 which includes Kneller Hall as a new SINC:  • <del>Candidate site for designation as a Site of Important</del> <u>Importance for Nature Conservation (subject to Regulation 19 Local Plan consultation)</u>
MM17	Site Allocation 21 Kneller Hall, Whitton, 3 <sup>rd</sup> para. in 'Description of Current Site	105	Update the site description:  The site includes extensive grounds designated as MOL, which include playing fields, with a significant number of protected trees. <u>The grounds are also a designated Site of Importance for Nature Conservation, the majority of which is acid grassland, with a proportion towards the south identified as irreplicable.</u>

Change Ref.	Section of the Plan	Page	Proposed Modification
	Character' in 'Context' section		
MM18	Site Allocation 21 Kneller Hall, Whitton, 10 <sup>th</sup> bullet point in 'Vision' section	106 - 107	<p>Amend the text:</p> <ul style="list-style-type: none"> <li>It is expected that the existing playing fields will be retained and where possible upgraded, such as ancillary facilities including changing facilities, to support the use of the playing fields; <del>it is</del> provided that any existing ecological benefits and the openness and character of the MOL is <del>retained</del><u>protected</u>, and where possible enhanced. There is an expectation that any redevelopment proposal would improve the character and openness of the designated open land <u>and protect the ecological value of the SINC in accordance with Policy 39</u>. Development in the MOL itself <del>would</del> <u>is</u> not <del>be</del> supported, though there may be an opportunity to consolidate and re-provide the current built footprint within the MOL in a new building, in compliance with Local Plan Policy 35 and the requirements of the NPPF, subject to scale, massing and impact on character and openness.</li> </ul>
			<b>Site Allocation 22 Whitton Community Centre, Whitton</b>
MM19	Site Allocation 22 Whitton Community Centre, 1 <sup>st</sup> and 2 <sup>nd</sup> bullet points of 'Access to Open Space/Nature'	109	<p>Corrections to the text:</p> <p>Twickenham Cemetery (35m Nature north of site) <del>(150m west)</del> - Other Open Land of Townscape Importance (OOLTI), Site of Importance <u>for</u> Nature Conservation (SINC)</p> <p><del>There is a lively and attractive local shopping centre at Kew Gardens Station... there are also local parades at Kew Green and Sandycombe Road which provide for top-up shopping... the strategy for this area is to conserve the character, whilst enhancing existing features where appropriate (junction of Percy Road) (75m northwest) - OOLTI</del></p>

Change Ref.	Section of the Plan	Page	Proposed Modification
MM20	Site Allocation 22, Whitton Community Centre, Whitton, 'Description of Current Site Character' in 'Context' section	109	Amend first sentence in 'Description of Current Site Character' box:  'Whitton Community Centre is a <del>part single</del> , <del>part two</del> -storey standalone building accessed from the south side of Percy Road, with a car park to the front of the property.'
MM21	Site Allocation 22, Whitton Community Centre, Whitton, 1 <sup>st</sup> bullet point in 'Vision' section	110	Amend first bullet to add additional text: <ul style="list-style-type: none"> <li><u>Given the importance of the community use and the services it provides, any redevelopment of the site would need to ensure the adequate reprovion of this use.</u> Local Plan Policy 49 Social and Community Infrastructure proposes that should a scheme come forward for redevelopment or change of use to 100% genuinely affordable housing, in accordance with Policy 11 Affordable Housing in terms of mix, tenure and affordability, then it would not need to be considered for alternative social infrastructure use nor marketing evidence submitted. In those circumstances, a wholly affordable housing scheme would be supported. However, on this site the Council is seeking affordable housing with community/social infrastructure, due to the need to reprovide the existing use.</li> </ul>
MM22	Site Allocation 22, Whitton Community Centre, Whitton, 2 <sup>nd</sup> bullet point in 'Vision' section	110	Amend second bullet:  <u>It is recognised that there are a range of social and community uses in operation in the immediate area.</u> Redevelopment of the site should explore opportunities for complementary and greater joined-up services with neighbouring uses.
			<b>Place-based Strategy for Richmond &amp; Richmond Hill</b>
MM23	Place-based Strategy for Richmond & Richmond Hill, section entitled Overall strategy	122	Update the following text in the section entitled "Overall strategy":  The 2020 Centre Land Use Survey reported an increase in vacancies in Richmond town centre due to the impact of the pandemic, with visible vacancies in shopping frontages, such as the closure of House of Fraser. The Retail Study 2023 (pPhase 2) reports that Richmond is considered to have an upscale market position and forecasts an increase in convenience goods floorspace <u>by 2039</u> and additional food/beverage floorspace requirements, resulting in total <u>requirement (retail and</u>

Change Ref.	Section of the Plan	Page	Proposed Modification
			<u>food/beverage</u> of ca. 3,270sq.m (gross) uses for Richmond. <u>An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study which supersedes earlier forecasting. It suggests that in Richmond there will be a surplus of retail (comparison and convenience) floorspace for both the 2034 (310 sqm) and 2039 (84 sqm) forecasts and a requirement for 2030 sqm of food/beverage floorspace by 2034 rising to 3300 sqm in 2039, resulting in an overall requirement (retail and food/beverage) of c 1720 sqm (gross) rising to 3240 sqm (gross) in 2039.</u> There is therefore no need to allocate for additional floorspace, but there is expected to be a shift from comparison goods retail space to food/beverage and leisure/cultural uses, with vacant shop premises also converting to these uses. This may utilise the flexibility introduced by Government allowing for changes of use within Use Class E (commercial, business and service uses) which in principle do not require planning permission.
			<b>Site Allocation 25 Richmond Station, Richmond</b>
MM24	Site Allocation 25 Richmond Station, Richmond, 'Vision' section, second and eighth bullet points	128, 129	<p>Update the following text in second bullet point:</p> <p>The Richmond upon Thames Retail and Leisure Study (Phase 2) forecasts a surplus of retail (<u>comparison and convenience</u>) floorspace (118 sqm) and a requirement for 1,956 sqm of food/beverage floorspace by 2034, amounting to a small total requirement (<u>retail and food/beverage</u>) of c. 1,750 sqm (gross) uses for Richmond to 2034. <u>An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study which supersedes earlier forecasting. It suggests that in Richmond there will be a surplus of retail (comparison and convenience) floorspace for both the 2034 (310 sqm) and 2039 (84 sqm) forecasts and a requirement for 2030 sqm of food/beverage floorspace by 2034 rising to 3300 sqm in 2039, resulting in an overall requirement (retail and food/beverage) of c 1720 sqm (gross) rising to 3240 sqm (gross) in 2039.</u></p> <p>Amend the eighth bullet point:</p> <p>Development should <del>demonstrate an understanding of</del> <u>have due regard to</u> the station BTM, including its visual character which lies principally in the façade and booking hall. Any redevelopment proposal should be of the highest quality in character and respond positively to the Conservation Area and BTM.</p>
			<b>Site Allocation 26 Former House of Fraser, Richmond</b>
MM25	Site Allocation 26 Former House of Fraser, 'Vision'	132	Update the following text in first bullet point:

Change Ref.	Section of the Plan	Page	Proposed Modification
	section, first bullet point		The Richmond upon Thames Retail and Leisure Study (Phase 2) forecasts a surplus of retail ( <u>comparison and convenience</u> ) floorspace (118 sqm) and a requirement for 1,956 sqm of food/beverage floorspace by 2034, amounting to a small total requirement ( <u>retail and food/beverage</u> ) of c. 1,750 sqm (gross) uses for Richmond to 2034. <u>An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study which supersedes earlier forecasting. It suggests that in Richmond there will be a surplus of retail (comparison and convenience) floorspace of 310 sqm and a requirement for 2030 sqm of food/beverage floorspace by 2034, resulting in an overall requirement (retail and food/beverage) of c 1720 sqm (gross).</u>
			<b>Site Allocation 30 Sainsburys, Lower Richmond Road, Richmond</b>
MM26	Site Allocation 30, Sainsburys, Lower Richmond Road, 'Transport / Highways' box within 'Context' section	143	Factual change. Amendment to PTAL score :  PTAL <del>54</del> 'very good'
			<b>Site Allocation 31 Kew Retail Park, Kew</b>
MM27	Site Allocation 31 Kew Retail Park, Bessant Drive, Kew. 1st bullet point of 'Transport/Highways' box in 'Context' section	149	Add:  <ul style="list-style-type: none"> <li>PTAL <del>0-2</del> 'worst to poor'</li> </ul>
MM28	Site Allocation 31 Kew Retail Park, Bessant Drive, Kew, Last sentence of 2 <sup>nd</sup> bullet point under Vision	151	Delete the following text within bullet point 2, under the Vision: <del>Any new convenience retail provision should not exceed the floorspace of the existing units, to protect the existing local centre in Kew.</del> And replace with: <u>Any mixed use scheme including retail, will require a Retail Impact Assessment where applicable, in accordance with Policy 18 (g).</u>
			<b>Site Allocation 34 Richmond Athletic Association Ground, Old Deer Park</b>
MM29	Site Allocation 34 Richmond Athletic Association Ground, Old Deer Park,	161	Update the text:  The evidence set out in the Council's Playing Pitch <u>and Outdoor Sports</u> Strategy ( <del>2015</del> <u>2023</u> ) suggests that the sports ground needs to be retained; however, improvements <u>to pitch quality</u> are

Change Ref.	Section of the Plan	Page	Proposed Modification
	Richmond. 1st bullet point under Vision		<del>required in relation to the existing facilities, including consideration of additional sports lighting on the seven senior pitches to eradicate 'overplay' to the changing facilities and the quality of the playing pitches as a result of them currently being 'overplayed'. The recent Action Plan updates have not identified any significant change to the situation, although the evidence base is due to be these are regularly updated in 2023.</del>
			<b>Site Allocation 35 Stag Brewery, Mortlake</b>
MM30	Site Allocation 35 Stag Brewery, Lower Richmond Road, 4 <sup>th</sup> bullet point of 'Vision'	169	Update the text:  <del>Whilst this site is not located within a town centre, it falls within the Mortlake Area of Mixed Use. It is therefore expected that this site will provide a substantial mix of employment 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.</del>
			<b>Site Allocation 37 Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen</b>
MM31	Site Allocation 37 Telephone Exchange and 172 – 176 Upper Richmond Road West, 'Vision' section, second bullet point	175	Update the following text in second bullet point:  The Richmond upon Thames Retail and Leisure Study (Phase 2) forecasts a small requirement for 189 m2 of retail ( <u>comparison and convenience</u> ) floorspace and a requirement for 1,128 sqm of food/beverage floorspace by 2034, amounting to a total requirement ( <u>retail and food/beverage</u> ) of c.1,300 sqm (gross) uses for East Sheen/Barnes to 2034. <u>An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study which supersedes earlier forecasting. It suggests that for East Sheen/Barnes there will be no requirement for retail (comparison and convenience) floorspace and a requirement for 1,100 sqm of food/beverage floorspace and hence a total requirement (retail and food/beverage) of c 1,100 sqm (gross) to 2034.</u>
			<b>Policy 3 Tackling the Climate Emergency (Strategic Policy)</b>
MM32	Policy 3 Tackling the Climate Emergency (Strategic Policy), Part D	184	Amend the text:  The Council will work with partners and local communities to improve the energy and water efficiency of the existing building stock and wider public realm, with a particular focus on increasing energy efficiency of homes and businesses, especially improved insulation in lofts, walls and floors....
			<b>Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)</b>

Change Ref.	Section of the Plan	Page	Proposed Modification
MM33	Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency, Part D 5.	187	Correct the reference at part D.5:  5. to reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the London Plan's Cooling Hierarchy (Policy SI 4 Managing Heat Risk) and meet the requirements of Part O of the Building Regulations (TM5 <del>92</del> (domestic) and TM5 <del>29</del> (nondomestic))
			<b>Policy 6 Sustainable Construction Standards</b>
MM34	Policy 6 Sustainable Construction Standards, Part A 4.	192	Clarify the approach:  Development that results in a new residential dwelling, including conversions, change of use, and extensions that result in a new dwelling unit, <u>must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.</u> <del>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).</del>
			<b>Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy)</b>
MM35	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part A	200	Remove the term minimise:  All developments will need to be made safe for their lifetime and clearly demonstrate that they avoid, <del>minimise</del> or reduce contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers; taking account of climate change and that they do not increase flood risk elsewhere.

Change Ref.	Section of the Plan	Page	Proposed Modification
MM36	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part B, and Paragraph 16.69	200, and 207	<p>Clarify in part B:  B. To enable development, proposals must provide mitigation and resilience against flood risk as set out in the Council's SFRA, <u>including but not limited to adequately raising finished floor levels, providing flood storage compensation and alleviation, and provide appropriate compensation to existing flood risk levels and volumes, addressing the predicted 1 in 100 year Risk of Flooding from Surface Water (RoFSW) mapped depths as a minimum.</u> Advice should be sought from the Lead Local Flood Authority (LLFA) and/or the Environment Agency as appropriate.</p> <p>As a consequence of the above changes to part B, add the following details to supporting text after paragraph 16.69:  <u>In relation to surface water flooding in line with the current SFRA, proposals must provide mitigation and resilience against flood risk (taking advice from the LLFA as appropriate) and provide appropriate compensation to existing flood risk levels and volumes (addressing the predicted 1 in 100 year RoFSW mapped depths as a minimum), supported by detailed flood risk modelling if appropriate.</u></p>
MM37	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part D, and Paragraph 16.70	200, and 208	<p>Clarify in part D:  Where a Flood Risk Assessment is required, appropriate <del>on-site attenuation</del> measures to alleviate <del>both fluvial, undefended tidal</del> and surface water flooding should be provided over and above the minimum <del>fluvial and undefended tidal</del> flood storage compensation and on-site attenuation requirements, <u>where feasible and justified by appropriate evidence.</u></p> <p>As a consequence of the above changes to part D, add the following to supporting text after paragraph 16.70:  <u>A FRA should contain the evidence for the preferred method of mitigation, including any alternatives it was not possible to provide and detail how any associated risks from the chosen form of mitigation can be minimised.</u></p>
MM38	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part H, and Paragraph 16.76	203, and 208	<p>Add clarification:</p> <p>H. The Council requires the use of Sustainable Drainage Systems (SuDS) in all development proposals to manage surface water runoff as close to its source as possible, using the most sustainable solutions to reduce runoff volumes and rates. Ideally, all surface water should be managed on site. The development must not increase flood risk elsewhere and where possible</p>




Change Ref.	Section of the Plan	Page	Proposed Modification
			<p>reduce flood risk overall. Applicants will have to demonstrate that their proposal complies with the following:</p> <ol style="list-style-type: none"> <li>1. A reduction in surface water discharge to greenfield run-off rates wherever feasible.</li> <li>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: <ol style="list-style-type: none"> <li>a. a runoff rate of 2 l/s or below, <del>or</del></li> <li>b. <u>a Where this is not possible and justification is provided, applicants should detail how at least 50% attenuation of the site's surface water runoff at peak times based on the levels existing prior to the development, will be achieved.</u></li> </ol> </li> </ol> <p>The following change is also proposed to paragraph 16.76:</p> <p>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 runoff rate of 2 l/s or below. <u>Where this is not possible and justification is provided, applicants should detail how at least, or a 50% attenuation of the site's surface water runoff at peak times, based on the site's performance prior to development, will be achieved.</u></p>
MM39	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part J	203	<p>Amend as follows:</p> <p>In addition, in line with the requirements of the Thames Estuary 2100 Plan, developments adjoining the River Thames must maintain and where necessary enhance or raise <u>(or demonstrate how they could be raised in the future)</u> flood defences to the 2065-statutory level as set out in the TE2100 Plan <u>(or latest version)</u> <del>(or show how they could be raised in the future)</del>, demonstrating that they will continue to provide adequate flood protection for the lifetime of the development.</p>
MM40	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part L	205	<p>Amend as follows:</p> <p>Submitted FRAs should utilise the <u>'central' appropriate</u> climate change scenarios when implementing the climate change allowances for surface water and fluvial flood risk. Assessments of</p>

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			tidal flood risk should use the current TE2100 crest levels guidance and breach modelling to account for worst-case scenarios.
MM41	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Paragraphs 16.72 and 16.74	208	<p>Amend the drainage hierarchy in paragraph 16.74 to the following:</p> <ol style="list-style-type: none"> <li>1. <del>Store</del> rainwater for later use as a resource (for example rainwater harvesting, blue roofs for irrigation)</li> <li>2. <del>Use infiltration techniques, such as porous surfaces in non-clay areas</del> rainwater infiltration to ground at or close to source</li> </ol> <p>In addition amend paragraph 16.72:</p> <p><u>In line with Policy SI13 Part E: Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.</u></p>
MM42	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Paragraph 16.80	209	<p>Amend as follows:</p> <p>Natural flood management methods, such as those included in the Thames Landscape Strategy's 'Rewilding Arcadia' project, should be employed in development proposals due to their multiple benefits including increasing flood storage and creating leisure areas and habitat. There is the potential to achieve significant improvements when undertaking flood defence work, including improved public spaces, access to the river and the Thames Path, and the creation of new habitats. Development should where possible seek to implement those measures set out in Policy 40 Rivers and Corridors when mitigating flood risk, <u>in line with the Riverside Strategy Approach set out in the Thames Estuary 2100 Plan.</u></p>
MM43	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), new paragraph following 16.83 as an	210	<p>Add a new paragraph as follows:</p> <p><u>The Council supports proposals for strategic flood alleviation measures (and associated enabling works), including the emerging flood alleviation measures at Teddington and Molesey weirs, as part of the wider River Thames Scheme. The project is designed to significantly reduce the risk of flooding by creating a new river channel in two sections alongside the Thames in Runnymede and</u></p>

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	additional paragraph under subtitle 'Flood defences'		<u>Spelthorne, as well as increasing capacity at Sunbury, Molesey and Teddington weirs. These proposed works will increase the capacity of the Thames through Surrey and south west London, reducing the risk of flooding.</u>
MM44	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Paragraph 16.66	207	<p>Amend the reference in the supporting text:</p> <p>The borough contains a number of islands in the River Thames. Where the access and egress to and from the island begins within the functional floodplain, for the purposes of new development, such islands will be considered and treated as functional floodplain (Zone 3b), even if parts of the islands may be within an area of lower probability of flooding. <u>For the River Thames, the functional floodplain is defined as land riverward of the Thames Tidal Flood Defences.</u> In line with the guidance set out in the Council's SFRA, new developments are restricted to 'Water Compatible' and 'Essential Infrastructure' (subject to an Exception Test) as per the guidance in the Flood Risk and Coastal Change PPG.</p>
			<b>Policy 9 Water Resources and Infrastructure (Strategic Policy)</b>
MM45	Policy 9 Water Resources and Infrastructure (Strategic Policy), Part B	211	<p>Move sub title 'Water quality' beneath Part B:</p> <p><del>Water quality</del></p> <p>B. The development or expansion of water supply or wastewater 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 and that any such impact is minimised as far as possible.</p> <p><u>Water quality</u></p> <p>C. The Council expects development proposals to:</p>
MM46	Policy 9 Water Resources and Infrastructure (Strategic Policy), Parts D and F, Paragraphs 16.98, and 16.99	211, 212, 213	<p>Amend the policy:</p> <p>D. New major residential and major non-residential development will need to provide information <u>as part of a planning application that shows early engagement by the applicant with the sewerage and water supply network provider, to demonstrate the provider can meet their duty to ensure</u> there is adequate water supply, <del>surface water</del>, foul drainage and <del>sewerage</del> treatment capacity to serve the development.</p>

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			<p><del>F. 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.</del></p> <p><del>G.</del> 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.</p> <p>Amend the supporting text:</p> <p>16.98 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. Planning conditions will be used to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are strongly encouraged to contact the water/wastewater company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. <u>This is considered to accord with London Plan Policy SI 5 part E.</u></p> <p>16.99 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. <u>There may be a requirement for phasing of development where necessary infrastructure upgrades are due to be delivered, to ensure development does not outpace essential network reinforcement.</u> 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.</p>

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MM47	Policy 9 Water Resources and Infrastructure (Strategic Policy), Paragraph 16.92	212	Add the following modification to 16.92: <u>Population increase, coupled with the designation of the Thames Water region as an area of 'seriously water stressed', means extra demand for water...</u>
			<b>Policy 10 New Housing (Strategic Policy)</b>
MM48	Policy 10 New Housing (Strategic Policy) Part A, Housing Trajectory, Paragraphs 17.1, 17.2, 17.4, 17.5, 17.6, 17.11, 17.12	213 - 215	<p>Add details of the stepped trajectory (to reflect the Housing AMR 2023/24) to part A of the policy:</p> <p>A. The Borough's <del>ten-year</del> <u>London Plan</u> housing <del>target</del> <u>requirement</u> is 4,110 homes, <u>with a total Local Plan housing requirement of 5,928 dwellings over the plan period from 2024-2039.</u>  <u>Housing delivery will be in accordance with the following stepped trajectory:</u></p> <ul style="list-style-type: none"> <li>• <u>2021/22 to 2024/25 – 210 dwellings per annum</u></li> <li>• <u>2025/26 to 2027/28 – 420 dwellings per annum</u></li> <li>• <u>2028/29 to 2030/31 – 670 dwellings per annum</u></li> </ul> <p>The Council will exceed ...</p> <p>Update the housing trajectory (after paragraph 17.4) with the latest version as at 1.4.24 taken from the AMR – Housing 2023/24 (see larger image at Annex A to this schedule):</p>  <p>Update the supporting text:</p> <p>17.1 The London Plan sets a ten year target of 4,110 homes for net housing completions, for the borough of Richmond. This is to cover the period <del>2019/21/202</del> <u>2021/202</u> - <del>202830/2931</del> <u>2030/2931</u> although it was finally confirmed on publication of the London Plan in March 2021, and can be rolled forward for future years beyond 2029. The indicative target beyond <del>202932</del> <u>2032</u> is <del>3,639 homes for net housing completions, or 306 homes per annum</del>, based on rolling forward in accordance with the London</p>

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			<p>Plan identified capacity for large sites and the small sites figure, until it is replaced by a revised target in a new London Plan.</p> <p>17.2 In accordance with London Plan Policy H1 this target is expected to be achieved, through optimising the potential for housing delivery on all suitable and available brownfield sites. The Local Housing Needs Assessment 2021 analysis considers demographic trends and a scenario to understand the potential population growth associated with the <del>delivery of 411 homes per annum</del> <u>proposed housing delivery over the Local Plan period</u>.</p> <p>...</p> <p>17.4 A housing trajectory is published and annually updated, in the Council's Authority Monitoring Report (AMR). <del>This</del> <u>It</u> is required by the NPPF and identifies a supply of specific deliverable sites sufficient to provide five years supply 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.</p> <p>17.5 Although the housing target is monitored on an annual basis, the London Plan at paragraph 4.1.10 sets out that the increase in housing delivery required by the target may be achieved gradually and boroughs are encouraged to set a realistic, stepped housing delivery target over a ten-year period. This is considered relevant to the borough, given the shortfall in delivery in <del>2021/22</del> <u>and the initial future years</u>, balanced against the considerable increase expected in small sites delivery whereby there will be a time lag for the change in the policy context towards incremental intensification to result in proposals coming forward, and given some identified large sites are expected to deliver in years five to ten. Government has also acknowledged the disruption to housing delivery and monitoring caused by restrictions in 2020 in response to the COVID-19 pandemic. <u>The stepped trajectory based on the Housing AMR 2023/24 is set out within Policy 10 and will form the basis of the monitoring framework and become part of future Housing Delivery Test calculations.</u></p> <p>17.6 The latest housing Authority Monitoring Report (reviewed annually) sets out that the borough is on course to meet and exceed the strategic dwelling requirement over <del>a ten-year</del> <u>the plan</u> period. This is reflected in the broad expected pattern of future housing land supply set out in Policy 10 part 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.</p> <p>...</p> <p>17.11 The Government's Housing Delivery Test (HDT) is an annual measurement of housing delivery:</p>

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			<ul style="list-style-type: none"> <li>Results of the 2018 HDT showed 1,332 homes delivery 2015/16 to 2017/18 against 945 homes required, a measurement of 141% and therefore no action required.</li> <li>Results of the 2019 HDT showed 1,147 homes delivery 2016/17 to 2019/20 against 945 homes requirement, a measurement of 121% and therefore no action required.</li> <li>Results of the 2020 HDT showed 1,024 homes delivery 2017/18 to 2019/20 against 918 homes requirement, a measurement of 112% and therefore no action required.</li> <li>Results of the 2021 HDT showed 2,019 homes delivery 2018/19 to 2020/21 against 813 homes requirement, a measurement of 248% and therefore no action required. However, due to a change in the GLA methodology for monitoring, a revised housing flow return was submitted by the GLA which confirmed 877 homes delivery in this period, a measurement of 108%, and therefore no action required</li> </ul> <p>17.12 For the 2020 measurement, a reduction in the period for measuring total homes required was applied, using an 11-month period for the 2019/20 monitoring year, to account for disruption to housing delivery and monitoring linked to the COVID-19 pandemic. For the 2021 measurement, Government applied a four-month reduction to account for continued fluctuations due to COVID-19 disruptions. In accordance with the Government thresholds, if future delivery falls below 95% of the housing requirement, then an action plan will be produced to assess the causes of under delivery and identify actions to increase delivery in future years. The stepped requirement trajectory set out above in <u>Policy 10</u> will be used in future Housing Delivery Tests. See also Policy 55 Delivery and Monitoring.</p>
			<b>Policy 11 Affordable Housing (Strategic Policy)</b>
MM49	Policy 11 Affordable Housing (Strategic Policy), Paragraphs 17.13, 17.16, 17.20, 17.22, 17.24, 17.25, 17.26, 17.27, 17.28	216 to 221	<p>Replace Policy 11 with an amended version as below:</p> <p><b>Definitions for Affordable Housing</b>  Genuinely Affordable Housing- The Council considers the following to be genuinely affordable housing products:  - <u>Rented Affordable (specifically Social Rent- and London Affordable Rent).</u>  - London Living Rent (only when delivered in compliance with the Council's Intermediate Housing Policy Statement 2019 or any further update). <u>(Intermediate)</u>  - Shared Ownership (only when delivered in compliance with the Council's Intermediate Housing Policy Statement 2019 or any further update). <u>(Intermediate)</u></p> <p><b>Policy 11</b>  <b>Affordable Housing (Strategic Policy)</b></p>

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			<p><del>A. All new housing developments in the borough should provide at least 50 per cent of the total number of habitable rooms as affordable housing on site. The affordable housing being provided should be genuinely affordable for the majority of residents in the borough.</del></p> <p><del>B. A contribution towards affordable housing will be expected on all housing sites. The following requirements apply:</del></p> <ol style="list-style-type: none"> <li><del>1. 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.</del></li> <li><del>2. 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.</del></li> <li><del>3. 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.</del></li> </ol> <p>Table 17.2 Affordable Housing Contribution Sliding Scale</p> <table> <tr> <th>No of units proposed (gross)</th><th colspan="3">% Affordable Housing</th></tr> <tr> <th></th><th>For conversions and reversions (where there is no loss of former employment floorspace and for listed buildings)</th><th>For new build development or redevelopment (where there is no loss of former employment floorspace)</th><th>For any units replacing employment floorspace</th></tr> <tr> <td>9</td><td>36%</td><td>45%</td><td>90%</td></tr> <tr> <td>8</td><td>32%</td><td>40%</td><td>80%</td></tr> <tr> <td>7</td><td>28%</td><td>35%</td><td>70%</td></tr> <tr> <td>6</td><td>24%</td><td>30%</td><td>60%</td></tr> <tr> <td>5</td><td>20%</td><td>25%</td><td>50%</td></tr> </table>	No of units proposed (gross)	% Affordable Housing				For conversions and reversions (where there is no loss of former employment floorspace and for listed buildings)	For new build development or redevelopment (where there is no loss of former employment floorspace)	For any units replacing employment floorspace	9	36%	45%	90%	8	32%	40%	80%	7	28%	35%	70%	6	24%	30%	60%	5	20%	25%	50%
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			<p>A. <u>The Council is seeking to deliver 50 per cent of the total number of habitable rooms as affordable housing, on a range of types of sites across the borough. A contribution towards affordable housing will be expected on all housing proposals. The affordable housing being provided should be genuinely affordable for the majority of residents in the borough.</u></p> <p>B. <u>Where on site affordable housing is provided, the Council will require a minimum affordable housing tenure split of 70% Rented Affordable housing and maximum 30% Intermediate housing by habitable room. The Intermediate housing will be delivered in line with the Council's Intermediate Housing Policy Statement. Where on site provision is required, an application should be accompanied by evidence of meaningful discussions with Registered Providers which have informed the proposed tenure, size of units and design to address local priorities.</u></p> <p>C. <u>Developments involving the provision of affordable housing will be expected to achieve the same high quality standards as the private housing element of the scheme in terms of accessibility, internal space requirements, external appearance and design quality and provision of private outdoor space.</u></p> <p>D. <u>The Council will not accept the loss of any existing affordable housing as set out in Policy 14. Loss of Housing, and will expect any estate regeneration to provide the equivalent amount and tenure of affordable housing by habitable room, and where possible, achieve an uplift in provision.</u></p> <p><b><u>Major Sites (capable of providing 10 dwellings or more (gross))</u></b></p> <p>E. <u>For all major developments, applicants can follow the Fast Track Route by providing the relevant threshold level of affordable housing and meeting other Local Plan requirements.</u></p> <p>F. <u>Schemes that do not meet the threshold level, or require public subsidy to do so, will be required to submit detailed viability information through the Viability Tested Route. This will assess the maximum level of affordable housing (and any other required planning contributions) that a scheme can deliver in cases where the threshold level of affordable housing set out below cannot be met.</u></p> <p><b><u>Fast Track Route (FTR)</u></b></p> <p>1. <u>In line with Policy H5 (Threshold approach to applications) of the London Plan, the threshold approach applies to major development proposals which trigger affordable</u></p>

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			<p><u>housing requirements. The threshold level of affordable housing on gross residential development is:</u></p> <p><u>a) a minimum of 35 per cent; or</u></p> <p><u>b) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or</u></p> <p><u>c) 50 per cent for Locally Important Land &amp; Business Parks (the borough's Locally significant Industrial Sites (LSIS) as identified in Policy 24) and any non-designated industrial land that comes forward for residential uses in accordance with London Plan Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity.</u></p> <p><u>2. To follow the Fast Track Route, applications must meet the criteria set out in London Plan Policy H5(C). The Council considers the tenure mix of 70% Rented Affordable housing as a minimum and 30% Intermediate housing as a maximum, and higher levels of Rented Affordable housing are encouraged. Applicants should ensure they seek all opportunities to secure grant to maximise the number of affordable habitable rooms onsite.</u></p> <p><u>3. Fast tracked applications are not required to provide a viability assessment at application stage. To encourage delivery and determine whether additional affordable housing can be provided, the requirement for an early-stage viability review will be triggered if an agreed level of progress on implementation is not made within 18 months of the permission being granted (or a period agreed by the Council).</u></p> <p><b><u>Viability Tested Route (VTR)</u></b></p> <p><u>4. On all Locally Important Land &amp; Business Parks (the borough's Locally significant Industrial Sites (LSIS) as identified in Policy 24) and any non-designated industrial land and public land sites at least 50% on-site provision is sought. Where possible, a greater proportion should be achieved.</u></p> <p><u>5. On all other sites the Council expect a minimum of 50% affordable housing with a minimum affordable housing tenure split of 70% Rented Affordable housing and maximum 30% Intermediate housing by habitable room.</u></p> <p><u>6. Any application triggering affordable housing is expected to be accompanied by evidence of meaningful discussions with Registered Providers as set out in part (B) and explored funding opportunities to maximise the affordable housing to meet local priorities, and informed the capital value of the affordable housing.</u></p> <p><u>7. Any proposals submitted through the Viability Tested Route that provide less than 50% affordable housing will be expected to provide detailed site-specific viability evidence in a</u></p>

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			<p><u>standardised and accessible format to justify affordable housing has been maximised on-site. The cost of any independent review must be covered by the applicant.</u></p> <p>8. <u>If an application is following the Viability Tested Route where the site proposes a non-policy compliant level of affordable housing and is granted permission it will be subject to detailed review mechanisms (early, mid and late stage) throughout the period up to full completion of the development, including an advanced stage review mechanism.</u></p> <p>9. <u>In exceptional circumstances, where affordable housing cannot practically be provided on site, or off-site provision would create a better contribution (in terms of quantity and/or quality), the Council may accept provision of affordable housing off-site in the same area.</u></p> <p><b><u>Small Sites (1-9 dwellings (gross))</u></b></p> <p>G. <u>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. If a site proposes a non-policy compliant level of affordable housing, the cost of any independent review must be covered by the applicant.</u></p> <p><u>Table 17.2 Affordable Housing Contribution Sliding Scale</u></p> <table> <tr> <th><b><u>No of units proposed (gross)</u></b></th><th colspan="3"><b><u>% Affordable Housing</u></b></th></tr> <tr> <th></th><th><u>For conversions and reversions (where there is no loss of former employment floorspace and for listed buildings)</u></th><th><u>For new build development or redevelopment (where there is no loss of former employment floorspace)</u></th><th><u>For any units replacing employment floorspace*</u></th></tr> <tr> <td><u>9</u></td><td><u>36%</u></td><td><u>45%</u></td><td><u>90%</u></td></tr> <tr> <td><u>8</u></td><td><u>32%</u></td><td><u>40%</u></td><td><u>80%</u></td></tr> <tr> <td><u>7</u></td><td><u>28%</u></td><td><u>35%</u></td><td><u>70%</u></td></tr> <tr> <td><u>6</u></td><td><u>24%</u></td><td><u>30%</u></td><td><u>60%</u></td></tr> </table>	<b><u>No of units proposed (gross)</u></b>	<b><u>% Affordable Housing</u></b>				<u>For conversions and reversions (where there is no loss of former employment floorspace and for listed buildings)</u>	<u>For new build development or redevelopment (where there is no loss of former employment floorspace)</u>	<u>For any units replacing employment floorspace*</u>	<u>9</u>	<u>36%</u>	<u>45%</u>	<u>90%</u>	<u>8</u>	<u>32%</u>	<u>40%</u>	<u>80%</u>	<u>7</u>	<u>28%</u>	<u>35%</u>	<u>70%</u>	<u>6</u>	<u>24%</u>	<u>30%</u>	<u>60%</u>
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			<u>5</u>	<u>20%</u>	<u>25%</u>	<u>50%</u>
			<u>4</u>	<u>16%</u>	<u>20%</u>	<u>40%</u>
			<u>3</u>	<u>12%</u>	<u>15%</u>	<u>30%</u>
			<u>2</u>	<u>8%</u>	<u>10%</u>	<u>20%</u>
			<u>1</u>	<u>4%</u>	<u>5%</u>	<u>10%</u>
			<p>* Use Classes E (g) (i), (ii) (iii), B2, B8 and employment generating Sui Generis uses – this is applicable to all housing proposals in employment land. On sites that are capable of fewer than 10 units gross, by conversion or redevelopment, and it has already been agreed by the Council that on-site affordable housing is not suitable, offsite provision or an offsite contribution will be accepted.</p> <p>Amend the supporting text as follows:</p> <p>17.13 Richmond is a borough with a plethora of attributes such as its public parks, the river Thames and thriving centres which make it an attractive place to work and live. This results in people from not just London but all over the world wanting to make Richmond their home. However, due to the scarcity of land in the borough and other factors it is now experiencing an acute affordable housing crisis. Not enough affordable housing is being built to help alleviate the ever-growing need. Therefore, the Council will do everything in its power to make sure over the plan period <del>we hit</del> the 50% target <u>is achieved</u>.</p> <p>...</p> <p>17.16 The need for affordable housing in the borough is demonstrable, which has been evidenced by the Council's Local Housing Need Assessment (LHNA). This study looks at the current need in the borough, need from newly-forming households and existing households falling into need, minus the supply of affordable housing which is equal to the net need per annum of affordable housing. The LHNA estimates a net annual need of 1,123 affordable rented and <del>552</del> <u>284</u> affordable home ownership products to be provided between 2021-2039. These unconstrained figures do not take account of capacity and land availability and are therefore significantly higher than Richmond's <del>overall annual</del> housing target of 4110 homes <del>per annum</del> during the current London Plan period (2019-2041), which takes account of the borough's constraints.</p>			

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			<p>17.17 Richmond has a finite amount of large-scale developable sites due to various constraints, including the Thames and the various parks and open spaces. Small sites make a significant contribution to housing supply. The London Plan Policy H2 has set a minimum target of delivering 234 homes per year from small sites in the borough of Richmond, 57% of the overall annual housing target. The cumulative impact of these sites should contribute to affordable housing provision, justified by the evidence base and local circumstances. Without these contributions it would be a significant challenge to deliver the amount of affordable housing this borough needs.</p> <p>17.18 Contributions from small sites will be secured via a Planning Obligation. Financial contributions made to the ringfenced 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.</p> <p>17.19 The affordable housing 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. 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 outlining the policy requirements and the mechanism for assessing the contributions from individual sites is set out in the Affordable Housing SPD; including how each proposal is assessed 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.</p> <p>17.20 In the context of the Local Plan, genuinely affordable housing is primarily considered to be homes rented at either social rent or London Affordable Rent levels. The Council priority is social rented homes, as this is most affordable product available. Any schemes built through the GLA's current Affordable Homes Programme are expected to be for social rent. London Affordable Rent will be acceptable if evidence is provided that it will be affordable to the majority of residents living in the borough. Intermediate housing (such as Shared Ownership, London Living Rent) on site will only be considered genuinely affordable when delivered in compliance with the Council's Intermediate</p>

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			<p>Housing Policy Statement 2019 (and any further updates to this). The Council's latest affordability criteria and priority allocation for Intermediate Housing includes key workers. At application stage the affordability of the affordable housing products provided will be assessed on the total cost of the home, including service charges. First Homes and Starter Homes are not considered to be affordable in the context of Richmond due to the borough's high house prices. There are areas of the borough where even a 50% discount on open market value would not reduce the price under the £420,000 cap set by National Government for First Homes. These extremely large reductions have the ability to impact the viability of schemes which in turn could jeopardise the provision of <del>affordable</del> <u>Social</u> <del>Rented</del> homes, which is the priority need in the borough.</p> <p>17.21 The threshold (10 units or above) 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.</p> <p>17.22 London Plan Policy H5 has set out a threshold approach where if <u>an site meets application is providing at least 35% affordable housing or 50% in the case of public sector or industrial land, then they will not need to submit a viability assessment at the application stage. This policy is aimed at fast tracking applications through the system that provide the threshold level without being held up by potentially protracted discussions regarding viability. This approach seeks to embed affordable housing requirements into land values and create consistency and certainty across the Borough.</u> Richmond's affordable housing need is so great and the borough has such a limited supply of major sites, <del>using the threshold approach would have a detrimental impact on the Council achieving its goal of providing 50% affordable housing across the borough that applicants will be expected to maximise affordable housing onsite. Where schemes follow the Fast Track Route and provide the relevant threshold level of affordable housing, applicants should ensure they seek all opportunities to secure grant to maximise the number of affordable housing onsite. Further guidance on the Fast Track Route is set out in the Mayor's Affordable Housing LPG (Consultation Draft 2023).</del></p> <p>17.23 The percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes. Figures should be presented as a percentage of total residential provision in habitable rooms, units and floorspace to enable comparison. The Council's Affordable Housing Enabling Officers will provide guidance and should be involved in the discussions with Registered Providers at an early</p>



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			<p>stage, to determine the appropriate housing mix, including bedsize, to reflect local needs as set out in Policy 13 Housing Mix and Standards, taking into account the site-specifics of the location.</p> <p>17.24 In the Local Plan 2018, the tenure split is 80/20 in favour of <u>Rented Affordable rent</u> over <u>Intermediate products</u>. The need for <u>Rented Affordable rent homes</u> has not changed in the borough but there has been a change in policy within the London Plan. London Plan Policy H6 prescribes the affordable housing tenure split that London Boroughs should be applying in their policies. This is 30% low cost rent (social or London Affordable Rent), 30% intermediate (i.e London Living rent or Shared Ownership) and 40% to be determined by the borough. As the overriding need as evidenced by the LHNA in Richmond is for <u>low cost Social Rented homes</u> the whole of the 40% will be towards <del>that product</del> <u>Rented Affordable products with a priority to deliver Social Rented housing</u>. This is the reasoning for the policy's 70/30 split in favour of affordable rented products. The Council will still support (potentially through grant) any development, especially on public sector land, that provides a tenure split of 80/20 <u>Rented Affordable to Intermediate tenure</u>.</p> <p>17.25 The Council has rigorously tested their affordable housing targets to make sure that they are viable through what is called a Whole Plan Viability Study. It is confirmed that the policy compliant level of affordable housing required on sites is viable <del>so the Council will not accept anything less. Applications submitted that provide less affordable housing than set out in policy will be rejected.</del> The Council will in extraordinary circumstances and on a case-by case basis, accept viability arguments if it can be demonstrated that the site has abnormal costs that could not be foreseen. For example, infrastructure provision that could not have been foreseen at The Whole Plan Viability stage and need to be considered on a site-specific basis taking into account variations between private sales values, scheme composition and benchmark land value. The Council will only accept viability arguments once it has been confirmed that the applicant has explored with the relevant Council officers the availability and application of grant to increase or provide a better tenure of affordable housing.</p> <p>17.26 Where <u>detailed viability evidence is required to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be treated transparently and this will need to follow the guidance set out in RICS Assessing Viability in Planning under the National Planning Policy Framework 2019 for England (2021), National Planning Policy Practice Guidance, the Council's Affordable Housing SPD and the GLA's Affordable Housing and Development Viability SLPG (Consultation Draft 2023).</u> 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. To confirm on-site deliverability and/or establish notional values of affordable units which reflect local housing market conditions, evidence</p>



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			<p>should be provided of discussions with a number of Registered Providers (Not for Profit and demonstrating a high standard of management). 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. If build costs need to be assessed, then developers will also need to pay for these to be reviewed by an independent Quantity Surveyor.</p> <p>17.27 As evidenced by the LHNA the Council has a substantial need for affordable housing. As small sites which are not in employment use (less than 10 units and/or 1000sqm) aren't required to provide on-site affordable housing, this requires schemes above the threshold to deliver <u>the level of affordable housing as set out in Policy 11</u> 50% to help achieve our target. Therefore, payments in lieu will be strongly resisted where the policy requirement is for on-site provision. The Council only has a finite number of deliverable sites due to the various constraints in the borough. Offsite delivery or a payment in lieu would mean an opportunity to deliver actual affordable housing would be missed. If in the extraordinary circumstance that off-site provision is acceptable, then the Council will expect that the affordable housing is maximised on both sites. The Council will only accept this arrangement if the total number of affordable habitable rooms over both sites equal 50% of the total number of habitable rooms.</p> <p>17.28 Affordable housing will be secured on site by way of a legal agreement. To incentivise developers to build out their permissions in a timely manner, an early stage review will be inserted into all legal agreements securing affordable housing with a trigger date of 18 months after the date of the decision. The Council will <del>be resisting</del> any development which provides less than <u>a policy compliant offer of affordable housing on site, as per Policy 11</u><del>50% affordable housing on site</del>. If in the extraordinary circumstance that an application is approved providing less than 50% affordable housing <u>(unless the site qualifies for the Fast Track Route)</u>, an advanced stage review mechanism will be used to make sure that the scheme provides a policy compliant level <del>(50%)</del> of affordable housing if viability improves over the life cycle of the development. Review mechanisms in line with national policy guidance cannot be used to try and reduce the amount of affordable housing being provided.</p> <p>17.29 The Council expects all new developments in the borough to be tenure blind. The schemes should be designed and managed so that all residents have equal access to the common areas, open space and not restricted on the use of the site based on the value of their home. The Council will strongly resist the use of gates which separate areas within a development. If this is required due to safety reasons, then evidence will need to be provided which shows all residents will have access to the gated area. Affordable Housing schemes should be designed with the same ethos and</p>

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			attention to detail as a market housing scheme. Policy 44 sets out the design process the Council expects developers to follow where it is open market housing or affordable housing.
			<b>Policy 13 Housing Mix and Standards</b>
MM50	Policy 13 Housing Mix and Standards, Paragraph 17.60	229	Update the supporting text:  The Housing Design Standards London Plan Guidance <del>being prepared by the Mayor (consultation draft February 2022)</del> June 2023) provides guidance....
			<b>Policy 17 Supporting our Centres and Promoting Culture (Strategic Policy)</b>
MM51	Policy 17 Supporting our Centres and Promoting Culture (Strategic Policy), Paragraph 18.8	241	Update the supporting text:  18.8 ... The Richmond upon Thames Retail & Leisure Study (Phase 2) 2023 forecasts that up to 2034, there <u>is</u> an over-supply of 2,900 sqm gross of retail ( <u>comparison and convenience</u> ) floorspace, and an undersupply of food/beverage floorspace of approximately 5,400 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,500 sqm gross ( <u>retail and food/beverage</u> ). <u>An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study, to test whether the forecasts were sound using the latest inputs where appropriate, following in particular the publication of updated national expenditure information. This reveals that the revised forecasts are similar to the Phase 2 Study: up to 2034, an over-supply of approximately 3,000 sqm gross of retail (comparison and convenience) floorspace is forecast, and an under-supply of food/beverage floorspace of approximately 5,500 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,400 sqm gross (retail and food/beverage).</u> Put simply, the need for shopping space is forecast to decrease but the need to provide space for the food & beverage sector and potentially the wider leisure sector is increasing.
			<b>Policy 18 Development in Centres</b>
MM52	Policy 18 Development in Centres, Part C	244	Add at C cross-reference at end of first sentence:  Major development and/or developments which generate high levels of trips should be located within a town centre boundary <u>or Site Allocation meeting the requirements of Policy 17 A 2.</u> ...
			<b>Policy 19 Managing the Impacts of Development on Surroundings</b>
MM53	Policy 19 Managing the Impacts of	248	Amend part A2:  2. where there are proposals for new residential properties and they are located in close proximity

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	Development on Surroundings, Part A		to established or planned uses with late night licences <u>or other existing noise or nuisance-generating business or community activities</u> , the proposed residential use will need to demonstrate that it is capable of mitigating its impact, on established uses and future occupiers.
MM54	Policy 19 Managing the Impacts of Development on Surroundings, Part D and paragraph 18.39	249, 250	<p>Amend Part D. Over-concentration of uses:</p> <p>1. The Council will resist proposals that result in an over-concentration of similar uses (<del>such as</del> <u>including for example</u> betting shops, public houses, bars and take-aways) in any one area and/or that would result in an adverse impact on the amenity of nearby users as well as surrounding residential areas.</p> <p>Add a new sentence at the beginning of paragraph 18.39:  <u>For clarity, Part D1 of this policy provides examples of uses to which the policy can apply, but this is not an exhaustive list.</u> The impacts of food, drink and entertainment uses on the surrounding area need to be ...</p>
			<b>Policy 20 Shops and Services Serving Essential Needs</b>
MM55	Policy 20 Shops and Services Serving Essential Needs, paragraph 18.51	252	<p>After second sentence insert new sentence:</p> <p>This policy will apply to businesses with a significant proportion of floorspace selling goods which can be found in defined essential shops or provides an essential service. <u>It applies where the existing or last use of the premises was selling essential goods or providing an essential service.</u></p>
			<b>Policy 22 Promoting Jobs and our Local Economy</b>
MM56	Policy 22 Promoting Jobs and our Local Economy, Part D	256	<p>Add reference in part D:</p> <p>D. The design and layout of the development must ensure that the proposed uses can successfully co-exist with surrounding uses, having regard to the amenity of adjacent occupiers and the operational requirements of existing and future businesses, ensuring that any potential conflicts will be adequately mitigated <u>in accordance with London Plan Policy D13 Agent of Change.</u></p>
			<b>Policy 24 Industrial Land</b>

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MM57	Policy 24 Industrial Land, Paragraph 19.33	263	Add a new paragraph following 19.33:  <u>The Industrial Land and Uses London Plan Guidance (consultation draft December 2023) provides guidance on assessment of development proposals, including expectations for intensification and co-location considerations.</u>
			<b>Policy 27 Telecommunications and Digital Infrastructure (Strategic Policy)</b>
MM58	Policy 27 Telecommunications and Digital Infrastructure (Strategic Policy), Paragraph 19.62	270	Add a new paragraph following 19.62:  <u>The Digital Connectivity Infrastructure London Plan Guidance (October 2024) provides guidance on key requirements for development to support digital connectivity infrastructure, achieving better design and mitigating any adverse impacts.</u>
			<b>Policy 28 Local Character and Design Quality (Strategic Policy)</b>
MM59	Policy 28 Local Character and Design Quality, Paragraph 20.3, 20.4	272 - 273	Delete sub-heading before 20.3:  <b><del>Village Planning Guidance SPDs and Conservation Area Appraisals</del></b>  Delete paragraph 20.4 from the Plan:  <del>20.4 The Council has agreed a two year forward programme for prioritising reviews of the borough's existing Conservation Area Appraisals and developing new Appraisals for those areas that do not yet have an existing one, which commenced in 2021.</del>
			<b>Policy 29 Designated Heritage Assets</b>
MM60	Policy 29 Designated Heritage Assets, paragraph 20.31	278	Amend paragraph 20.31:  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, <u>unless it can be demonstrated that the impacts of the development on the significance of the asset can be fully assessed including views and vistas.</u>
			<b>Policy 30 Non-designated Heritage Assets</b>
MM61	Policy 30 Non-designated Heritage	280	Amendment to reference.

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	Assets, Paragraph 20.41		The Council will use the London <u>Historic Parks and Gardens</u> Trust Inventory as a basis for considering locally listing such parks and gardens in the borough.
			<b>Policy 31 Views and Vistas</b>
MM62	Policy 31 Views and Vistas, paragraph 20.43	283	<p>Amend paragraph 20.43:</p> <p>The Council commissioned further analysis work to review the borough's views and vistas, alongside the Urban Design Study. The Urban Design Study sets out details of valued views and vistas, including the range of prospects, linear views, and townscape views, which are highly important including in the borough's riverside and open space settings. These are recognised in each character area profile, along with the design guidance strategy for each area. This further analysis has provided a baseline assessment of existing protected views and vistas, additional new locally important views that have been identified, as well as setting out opportunities to improve these. This forms the basis for a draft Local Views Supplementary Planning Document to clearly identify the protected views <u>which will be finalised following the adoption of the Local Plan.</u></p>
			<b>Policy 33 Archaeology</b>
MM63	Policy 33 Archaeology, Paragraph 20.56	286	<p>Amend the supporting text at paragraph 20.56:</p> <p>GLAAS is the borough's archaeological adviser and should be consulted with regard to archaeological matters, <u>at an early stage of proposals particularly with regard to place-making and public benefit opportunities.</u></p>
			<b>Policy 35 Green Belt, Metropolitan Open Land and Local Green Space</b>

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MM64	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space, footnote to supporting text	295	<p>Add following footnote at bottom of page (referred to in first sentence of paragraph 21.12 as (5)-:</p> <p><u>5 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 35 and Policy G3 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.</u></p>
			<b>Policy 37 Public Open Space, Play, Sport and Recreation</b>
MM65	Policy 37 Public Open Space, Play, Sport and Recreation, Paragraph 21.27	303	<p>To update the supporting text:</p> <p>The Playing Pitch and Outdoor Sports Assessment and Strategy <del>is being reviewed and will be</del> <u>has been</u> updated in 2023.</p> <p>And any other consequential updates elsewhere in the Plan.</p>
			<b>Policy 39 Biodiversity and Geodiversity</b>
MM66	Policy 39 Biodiversity and Geodiversity, Part A.5 and paragraphs 21.74, 21.75 and 21.78	309, 313, 314,	<p>Amend part A.5 of the policy as follows: requiring the following development proposals to provide a <u>minimum</u> measurable <del>2</del><u>10</u>% net gain for biodiversity, in line with the latest available version of the DEFRA metric...</p> <p>Amend paragraph 21.74: The overall priority is to secure the inclusion of on-site Biodiversity Net Gain (BNG) enhancement features. The baseline for establishing <del>20% the national minimum requirement of 10% BNG requirements</del> will be identified and achieved by undertaking a walkover survey (undertaken by an accredited ecologist) of the proposed development site. Losses and gains as a result of proposed development will be calculated using the national Biodiversity Metric. Biodiversity net gain complements and works with the biodiversity mitigation hierarchy set out in the NPPF. Any biodiversity net gain delivered as part of a compensation strategy for development should be in addition to the protection for designated sites, protected or priority species and irreplaceable or</p>

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			<p>priority habitats. <u>Wherever possible, the Council encourages the minimum of 10% to be exceeded, through incorporation of ecological enhancements, as set out in part A of the policy. The importance of biodiversity in the borough is recognised and that due to pressures on species and habitats there is a need to protect and enhance biodiversity on sites in the borough, as well as the potential for delivering multi-functional benefits.</u></p> <p>Amend paragraph 21.75 and the indented bullet point under the requirements for major new developments:</p> <ul style="list-style-type: none"> <li>are required to submit a Biodiversity Net Gain plan to set out how the baseline biodiversity value has been calculated and how the net gain target will be achieved; The plan must demonstrate that the 'post-development' biodiversity value of the development is greater than 'pre-development' biodiversity value by <del>at least 20%</del> <u>a minimum of 10%.</u></li> </ul> <p>Amend paragraph 21.78: The Council will produce further planning guidance in the form of a SPD on biodiversity, specifically on biodiversity net gain, and set out for applicants and developers how biodiversity net gain can be delivered on a variety of sites, ranging from major to small-scale proposals. <u>The London Local Nature Recovery Strategy is being prepared and will identify opportunities for nature recovery and strategic biodiversity priorities.</u></p>
MM67	Policy 39 Biodiversity and Geodiversity, Part A.5.a and paragraph 21.75	309, 313	<p>Amendment to remove Policy 39 Part A.5.a:</p> <p>5. requiring the following development proposals to provide a measurable 20% net gain for biodiversity, in line with the latest available version of the DEFRA metric:</p> <p><del>a. small-scale householder applications which increase the footprint and/or floorspace of the existing dwelling;</del></p> <p><del>b. all development proposals, including conversions or changes of use, that result in 1 dwelling unit or more;</del></p> <p><del>be. non-residential development proposals which increase the footprint and/or floorspace;</del></p> <p>Amendment to delete reference in paragraph 21.75:</p> <p>... Natural England's Small Sites Metric will be appropriate for most <del>small sites</del> <u>small-scale householder applications as well as other minor development</u>, whilst the Biodiversity Metric 3.1 (or later versions) should be used for other applications for development. Development proposals should also ...</p>

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MM68	Policy 39 Biodiversity and Geodiversity, Part A.7 and paragraph 21.75	310, 314	<p>Amendment to Policy 39 Part A.7:</p> <p>7. protecting back gardens from development which may destroy, impair, or harm their integrity, <del>and removing Permitted Development Rights from where possible, to ensure new developments, including conversions and changes of use resulting in a new dwelling, for all proposals that require planning permission in order to protect rear and front residential garden spaces as a cumulative key wildlife habitat resource.</del></p> <p>Amendment to paragraph 21.75 (final bullet point):</p> <p>The Council <del>will</del> <u>may</u> remove Permitted Development Rights from <del>all</del> proposals that require planning permission to protect residential gardens, which contribute substantially to the total green space in the borough.</p>
			<b>Policy 40 Rivers and River Corridors</b>
MM69	Policy 40 Rivers and River Corridors, Part A	315	<p>Add reference:</p> <p><u>The Council expects development adjacent to rivers to contribute to improvement in water quality where relevant in accordance with Policy 9 Part C.</u></p>
MM70	Policy 40 Rivers and River Corridors, Paragraph 21.89	317	<p>Add reference at the end of paragraph 21.89:</p> <p><u>The Council encourages soft-engineering approaches to riverbank protection and the incorporation of an undeveloped buffer zone, where development can contribute to the natural state of the river environment that accords with Policy 39 Biodiversity and Geodiversity.</u></p>



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MM71	Policy 40 Rivers and River Corridors, Paragraph 21.92	317	<p>Add a paragraph after the supporting text at 21.92 to read:</p> <p><u>The river element of the BNG metric 4.0 (or any superseding version), set out in Policy 39 and the supporting text, will need to be submitted where the BNG guidance advises this is necessary in order to provide increased watercourse connectivity and associated habitat improvements.</u></p>
			<b>Policy 45 Tall and Mid-Rise Building Zones</b>
MM72	Policy 45 Tall and Mid-Rise Building Zones, Part A (Point 1)	328	<p>Amend the policy text at part A:</p> <ol style="list-style-type: none"> <li>1. Tall buildings should <del>respect</del> <u>avoid harm to</u> the views and vistas towards heritage assets across the borough and in neighbouring boroughs, including distinctive roof line features.</li> </ol>
MM73	Policy 45 Tall and Mid-Rise Building Zones, Part A (Point 9) and Paragraph 22.22	329, 331	<p>Amend part A.9 of the policy as follows:</p> <p>9. Proposals for Tall Buildings will <del>not be permitted</del> <u>resisted</u> outside the identified Tall Building Zones (see Appendix 3).</p> <p>Amend the supporting text:</p> <p><del>22.22 Tall buildings will only be an acceptable form of development in Tall Building Zones identified on tall building maps in Appendix 3. Tall building zones have been informed by the Urban Design Study which identified constraints that are considered unlikely to change over the plan period due to the uniqueness of the character of the borough including the expanse and quality of open landscapes, protected views and heritage assets. As such, and in line with London Plan Policy D9 part B(3), there is a presumption against tall buildings outside the locations identified in Appendix 3.</del></p> <p>New para The designation of an area as a Tall Building Zone does not mean the area has capacity to receive tall buildings within the appropriate range across its whole extent. Development proposals will need to consider the specific context of the plot, existing buildings surrounding the plot and any other development proposals in the area, including consented schemes. This designation also does not preclude other forms of development. Locations identified as Tall Building Zones can also accommodate high density mid-rise or mansion-block style development,</p>

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			rather than only standalone high-rise towers. <del>Outside Tall Building Zones, there is no presumption in support of tall buildings.</del>
MM74	Policy 45 Tall and Mid-Rise Building Zones, Paragraph 22.24	331	See proposed change to text in Appendix 3 which should also be amended at paragraph 22.24:  Tall building maps in Appendix 3 identify an appropriate tall building height range for each zone and show how heights should be dispersed across the zone. <del>Darker</del> <u>Red</u> colours <u>show areas appropriate for tall buildings and orange colours show areas appropriate for mid-rise buildings.</u> <del>Darker</del> <u>colours</u> indicate more potential for height and the lighter colours indicate less potential for height. ...
MM75	Policy 45 Tall and Mid-Rise Building Zones, Paragraph 22.32	333	Update the supporting text:  <del>The Mayor of London has advised that all referable residential development over 30m in height must include two staircases as a fire safety requirement. Similar measures are expected to come into force nationally via an amendment to Building Regulations following a and Government consultation in 2022 have been introducing new fire safety requirements including a requirement of two staircases for new residential buildings in tall buildings, with this requirement becoming mandatory in all new residential buildings above 18m from 2026 through Building Regulations. Applicants are advised to consult the Government's most recent fire safety and high-rise residential buildings guidance for up-to-date information and requirements. Applicants are further advised that these</del> <u>The measures are in addition to the fire safety requirements set out in London Plan Policy D12, with which all development is expected to comply, and the Mayor's Fire Safety London Plan Guidance (LPG).</u>
			<b>Policy 47 Sustainable Travel Choices (Strategic Policy)</b>
MM76	Policy 47 Sustainable Travel Choices (Strategic Policy), Part B	338	Amend the text:  B. Propose major developments (see Table 23.1 for a definition) in areas that <del>either</del> already have a Public Transport Accessibility Level of 4-6 or <del>if not</del> mitigate the impact of their development on the existing passenger transport network in accordance with Para. <del>440d</del> <u>114d</u> of the National Planning Policy Framework (NPPF). <u>The impact of all major developments will be assessed relative to current and forecast capacity and passenger trips on the passenger transport network.</u> Depending on the impact of the development relative to the capacity of the bus and rail network in its final assessment

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			year, this may include applicants making financial contributions to increase capacity and/or improve infrastructure on the passenger transport network.
MM77	Policy 47 Sustainable Travel Choices (Strategic Policy), Part E	338	Update the text:  E. Demonstrate that their proposed developments do not have a severe impact on the operation, safety, or accessibility of the local or strategic road network. Any impact on the local or strategic road network, including the impact of occupants parking vehicles on the carriageway, will need to be mitigated in accordance with para. 110d of the September 2023 NPPF / paragraph 114d of the December 2023 NPPF.
MM78	Policy 47 Sustainable Travel Choices (Strategic Policy), Paragraphs 23.17 and 23.18	342	Add a new paragraph before 23.17:  <u>As part of the Healthy Streets Approach, all new developments need to make it safe and attractive to walk, cycle and use public transport. All major developments should include an Active Travel Assessment as part of their transport assessment. In instances where the applicant is required to submit a Transport Statement (see Table 23.1), in line with TfL Guidance this should include an Active Travel Zone (ATZ) Assessment. In instances where the applicant is required to submit a Transport Statement, this should be assessed as part of the baseline profile of existing conditions for pedestrians and cycling and the ease of access to public transport.</u>  Amend paragraph 23.18 and add a new criterion at (4) (and renumber the subsequent list):  <u>4. Details of how the proposed development will provide a high-quality walking and cycling environment that promotes active travel.</u>
MM79	Policy 47 Sustainable Travel Choices (Strategic Policy), supporting text on Assessing the impact of developments, following paragraph 23.18	342	Add a new paragraph following 23.18:  <u>Proposals for new development will include any necessary mitigation measures required as a result of development to be funded and/or delivered by the developer to ensure the continued safe and efficient operation of the strategic and local road and transport networks. In this regard, the Council will continue joint working with adjoining authorities and TfL to establish the impacts of major development proposals on the local road and transport networks both within and outside the borough and how these might be mitigated and funded, in order to ensure there is no adverse significant impact on these networks and to continue to enable and encourage cross-boundary active and sustainable travel.</u>

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			<b>Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management</b>
MM80	Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management, Part K	345	<p>Update the text:</p> <p>K. Applicants proposing major developments (see Table 23.1 within Policy 47 'Sustainable Travel Choices (Strategic Policy)') will need to demonstrate that all servicing can take place off-street. If this is not possible, they may, depending on the number of servicing trips forecast and the potential impact on highway safety, need to pay for mitigation in the form of Traffic Management Orders and/or S278 highway works that will show their development will not have a severe impact on the safe use of the highway by other road users in accordance with Para. 110b <u>and d of the September 2023 NPPF / Para. 114b</u> and d of the <u>December 2023 NPPF</u>.</p>
MM81	Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management, Part D of policy and paragraph 23.32	347	<p>Amend references:</p> <p>Applications for new vehicular crossover or dropped kerb accesses will be assessed strictly in accordance with the guidance set out in the London Borough of Richmond's Transport Supplementary Planning Document (adopted July 2020) <u>and the latest highways authority guidance</u>.</p> <p>.. Applicants should refer to the Council's Transport SPD, including for guidance on selection of materials and landscaping to diminish the negative impacts of additional hard surfaces in front gardens if a new crossover is being proposed, <u>along with the updated highways authority guidance</u>.</p>
			<b>Policy 49 Social and Community Infrastructure (Strategic Policy)</b>
MM82	Policy 49 Social and Community Infrastructure (Strategic Policy), Paragraph 24.10	352	<p>To update the supporting text:</p> <p>The Council's Indoor Sports Facility Needs Assessment highlights the need for new facilities within the borough and will be updated in 2023<sup>5</sup>.</p>
			<b>Policy 51 Health and Wellbeing (Strategic Policy)</b>
MM83	Policy 51 Health and Wellbeing (Strategic	361	To update the supporting text:

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	Policy), Paragraph 25.14		A Health Impact Assessment (HIA) must be submitted with all major applications. A HIA should assess the health impacts of a <u>proposed</u> developments including consideration of <u>existing health and wellbeing implications</u> . <sup>7</sup> <u>It should identifying mitigation measures for any potential negative impacts as well as measures for enhancing any potential positive impacts.</u> <del>The London Healthy Urban Development Unit (HUDU) have developed a rapid HIA tool to quickly assess the impacts of a development plan or proposal and recommend measures, this tool should be used as early as possible in the planning process and established at pre-application stage.</del> <u>The HIA should be developed from RIBA Stage 1 to help influence concept and technical design as well as consider health and wellbeing inputs from community consultation processes such as workshops. The development of the HIA should demonstrate input from the lead architects and designers. The level of detail required for HIAs will be determined by the scale and impact of the development, HIA guidance is available online via the Council's website.</u> As set out in the Planning Obligations SPD, the <u>London Healthy Urban Development Unit (HUDU)</u> guidance and their Planning Contributions Model should be used to calculate the capital cost of the additional health facilities required to meet the increased demand which arises from new developments.
			<b>Policy 54 Basements and Subterranean Developments</b>
MM84	Policy 54 Basements and Subterranean Developments, Part C	371	Amend the policy wording:  Proposals for subterranean and basement developments, including extensions, as well as lightwells and railings, will be <del>assessed</del> <u>considered</u> against the advice set out in the Council's SPDs ...
			<b>Policy 55 Delivery and Monitoring</b>
MM85	Policy 55 Delivery and Monitoring, Paragraph 26.18	378	Add reference:  26.18 The IDP therefore ensures that all infrastructure matters necessary for the achievement of the Local Plan Vision and Spatial Strategy as well as the place-based strategies, policies and site-specific proposals are embraced. <u>All new infrastructure should be to high design and sustainability standards, as set out in other policies in the Plan, for example taking into account existing site constraints including utilities situated within sites, and seeking a creative approach to new development around utilities assets.</u>
			<b>Glossary</b>

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MM86	Glossary	388	<p>Amend the glossary definition for Public Transport Accessibility Levels (PTAL) as follows:</p> <p><b>Public Transport Accessibility Levels (PTAL)</b> – A measure of the relative accessibility of buildings and uses by to the public transport network. For each point walk time to the public transport network is combined with service wait time (frequency) to give a measure of public transport network density. This provides an overall access index which can be allocated to nine access levels between 0 and 6b. The higher the PTAL score (between zero to six), the better the accessibility. TfL has made pre-calculated PTALs available on WebCAT, its web-based connectivity assessment toolkit (<a href="http://www.tfl.gov.uk/WebCAT">www.tfl.gov.uk/WebCAT</a>).</p>
			<b>Appendices</b>
MM87	Appendix 3: Tall and Mid-Rise Building Zones, First paragraph	413	<p>Amend the text:</p> <p><del>Darker Red</del> colours on the Tall and Mid-Rise Building Zone maps <u>show areas appropriate for tall buildings and orange colours show areas appropriate for mid-rise buildings. Darker colours</u> indicate more potential for height and the light colours indicate less potential for height.</p>
MM88	Appendix 3 Tall and Mid-Rise Building Zones	413 - 416	<p>Update maps in Appendix 3. An updated version of Appendix 3 is attached to this schedule at Annex 1. (Information note: there are no proposed changes to the boundaries of tall and mid-rise building zones).</p>
MM89	Appendix 4: Review of Sites of Importance for Nature Conservation	417-431	<p>Update Appendix 4 including to:</p> <ul style="list-style-type: none"> <li>confirm the candidate site Collis Primary School (Site 1) – change from a candidate site to a new site of local grade importance</li> <li>confirm the candidate site York House Gardens (Site 9) – change from a candidate site to a new site of local grade importance</li> <li>confirm the candidate site Oldfield Road Meadow (Site 7) – change from a candidate site to a new site of local grade importance.</li> </ul> <p>In addition other updates have been identified as necessary to Table 28.2 and the mapping details. In light of the above a comprehensive check on the mapping has been undertaken, including for discrepancies against the Greenspace Information for Greater London (GiGL) records. An updated</p>

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			Appendix 4 including the above amends and any other suggested updates is attached to this schedule at Annex 2.

## List of Annexes

## Annex A:

- Updated housing trajectory as at 1.4.24 (taken from the AMR – Housing 2023/24)

Annex A: Updated housing trajectory as at 1.4.24 (taken from the AMR – Housing 2023/24)

