



Report to London Borough of Richmond upon Thames Council

by Ava Wood Dip Arch MRTPI

an Inspector appointed by the Secretary of State for
Communities and Local Government

The Planning
Inspectorate
Temple Quay House
The Square
Temple Quay
Bristol BS1 6PN
☎ 0117 372 8000

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION INTO THE CORE STRATEGY

DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 20 March 2008

Examination hearings held between 25 November and 4 December 2008

File Ref: L5810/429/7

Acronyms used in the Report

AMR	Annual Monitoring Report
CD	Core Document
CS	Core Strategy
DPD	Development Plan Document
GLA	Greater London Authority
GOL	Government Office for London
LDF	Local Development Framework
LDS	Local Development Scheme
LHA	Local Housing Assessment
LHAA	Local Housing Availability Assessment
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Areas

1 Introduction and Overall Conclusion

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
 - (a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document
 - (b) whether it is sound.
- 1.2 This report contains my assessment of the DPD in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act.
- 1.3 I am satisfied that the London Borough of Richmond upon Thames Core Strategy meets the requirements of the Act and Regulations. My role is to consider the soundness of the submitted DPD against the tests of soundness set out in Planning Policy Statement (PPS)12. When the DPD was submitted, PPS12 (2004): Local Development Frameworks was in force, but in June 2008, it was replaced by PPS12 (2008): Local Spatial Planning. Although the tests of soundness are now presented in a different and simpler way, they cover the same matters as before and my report follows the approach recommended in the revised PPS12.
- 1.4 The 2008 PPS12 requires that to be sound, a DPD should be justified, effective and consistent with national policy, along with a continuing requirement for the DPD to satisfy the legal/procedural requirements and be in conformity with regional planning policy. Justified means that a DPD should be founded on a robust and credible evidence base, and the most appropriate strategy when considered against the reasonable alternatives. Effective means that the submitted DPD should be deliverable, flexible and able to be monitored.
- 1.5 The Government intends that spatial planning objectives for local areas, as set out in the LDF, should be aligned not only with national and regional plans, but also with shared local priorities set out in Sustainable Community Strategies where these are consistent with national and regional policy. National policy emphasises the importance of spatial planning, requires local planning authorities to produce a Statement of Community Involvement (SCI) and follow its approach, and to undertake proportionate sustainability appraisal. PPS12 (2008) also confirms that the rigour of the examination process remains unchanged and inspectors will be looking for the same quality of evidence and content as before. Consequently, those reading this binding report must be assured that there is no dilution of the rigour applied to the assessment, nor do I believe the Council or anyone else would be prejudiced by my decision to follow the 2008 PPS12 approach, as the tests essentially remain the same in substance.
- 1.6 In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The changes I have specified in this binding report are made only where there is a clear need to amend the document in the light of the legal requirements and/or the tests of soundness in PPS12. None of these changes should materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes already undertaken.
- 1.7 My report firstly considers the legal requirements, and then deals with the relevant matters and issues considered during the examination. My overall

conclusion is that the **Core Strategy is sound**, provided it is changed in the ways specified. The report considers the changes required to meet the legal requirements and the three tests of soundness. These are summarised in the body of the report and set out in full in Annex A.

- 1.8 During the course of the Examination, and in response to my letter of 25 June 2008 (CD 7/19), the Council issued and consulted upon a set of proposed changes to the CS and the consequential supplementary Sustainability Appraisal. The changes (CD 7/12 and 7/13) are extensive but they are not substantive in their content. The alterations were proposed largely in the interest of completeness, consistency, clarity or brevity. After the end of the hearings part of the Examination, the Council issued a further set of changes (CD 7/24) and these were consulted on between 30 December 2008 and 10 February 2009.
- 1.9 With the exception of Changes J-72 and J-73, the Council proposed the most recent modifications to remove ambiguity in the wording of policies and in response to minor points raised at the hearings or in written submissions. I am satisfied that the combined set of changes proposed do not alter the CS to such a degree as to render it unrecognisable from the document originally consulted on. Furthermore, the changes have been consulted upon and I have read the responses. While I support all of the changes proposed by the Council, this report lists, and comments on, only the specific changes that are essential to render the CS sound.
- 1.10 In reaching my conclusion on soundness, I am conscious of the written and oral representations made in response to the consultation exercises that the CS was subjected to, and further submissions made in response to the matters and issues raised by me. That I do not refer to each individual point in this report does not mean that they have been ignored. A number of issues or concerns raised by respondents have been either addressed satisfactorily in the proposed changes (CDs 7/12 and 7/24) or dealt with adequately by the Council in its position statements. I have concentrated my attentions on issues that go to the heart of the soundness of this DPD.

2 Legal Requirements

- 2.1 The CS is contained within and prepared in accordance with the Council's Local Development Scheme (LDS) of April 2007 (CD7/07). It substantially follows the timescales set out in the LDS.
- 2.2 Alongside the preparation of the DPD it is evident that the Council has carried out a parallel process of sustainability appraisal. The process was updated and consulted upon when changes to the CS were proposed by the Council before and after the hearings took place.
- 2.3 A scoping exercise was carried out by Baker Shepherd Gillespie on the CS Preferred Options Document in August 2007, which concluded that an Appropriate Assessment (Habitats Directive) was not required. The CS was reviewed at submission stage and the consultant's assessment remained valid. Natural England concurred with this view (letter from Natural England CD 8/045). I am satisfied that as a result of the scoping exercise carried out there is no need for an Appropriate Assessment.
- 2.4 I am satisfied that the DPD has regard to national policy
- 2.5 The Greater London Authority (GLA) has indicated that the CS would be in general conformity with the Spatial Development Strategy for Greater London

Consolidated with Alterations since 2004 (The London Plan CD 5/01), provided that certain changes proposed by the Council are included¹.

- 2.6 There is no conflict with the London Plan Blue Network policies, as much of the river environment in the Borough of Richmond is protected by its MOL status which severely limits the regeneration or development options, even for those that are dependent on the river for their livelihood or residence. I have not been persuaded by any of the arguments for altering the MOL boundary, which is well-established and should endure for the long term. The London Plan does not indicate a steer in that direction.
- 2.7 I am satisfied that the CS is in general conformity once the following changes are incorporated²:
- **Change 29: Policy 2.B - the wording change emphasises use of decentralised energy, to accord with London Plan Policies 4A.5 and 4A.6.**
 - **Change 30: Policy 2.C - includes a specific carbon emission target to accord with London Plan Policy 4A.7**
 - **Change 39: Policy 5.B – commits the Council to safeguarding land for transport functions, to allow for provision of sites to co-ordinate with an expanded transport system.**
 - **Change 67: Policy 14.C – protects existing gypsy and traveller sites. (to be subsumed in reworded Policy 14.C as below)**
 - **Change 68: New Policy 14.D- introduces reference to the London Plan Density Matrix.**
 - **J-70 to J-73: Reworded Policy 14.C – gypsy and traveller sites.**
- 2.8 The Core Strategy Background Paper (CD 7/02) adequately demonstrates that each of the Core Policies in the CS can be linked to or provides a land use expression for at least one of the 7 key priorities of the Richmond upon Thames Community Plan 2007-2017. Therefore, I am satisfied that the CS has had regard to the sustainable community strategy for the area.
- 2.9 I am satisfied that the DPD complies with the specific requirements of the 2004 and 2008 Regulations including the requirements in relation to publication of the prescribed documents, availability of them for inspection and local advertisement, notification of DPD bodies and provision of a list of superseded saved policies.
- 2.10 The SCI has been found sound by the Secretary of State and was formally adopted by the Council in June 2006. It is evident from the documents submitted, including the Regulation 28 and 31 Statements and its Self Assessment Paper, that the Council has met the requirements as set out in the Regulations. The documents that I have seen and been referred to, including CDs 7/20-7/23, demonstrate that the Council has been diligent in meeting its statutory and SCI obligations through extensive publicising and consulting at each stage of the LDF process. At the first hearing session, the debate centred on a perceived lack of engagement with the public. However, on close examination of the complaint, the Council's officers were able to point to the manner in which each of the specific SCI requirements were met.

¹ Letter from GLA dated 19 November 2008

² CD 7/12 comprises the CS pre-hearing changes and the numbers referred to derive from that document. CD 7/24 comprises the post-hearings changes which are prefixed by the letter "J".

- 2.11 I recognise that numbers of respondents reduced as the CS advanced to its submitted stage. For instance, 1,000 people responded at the Issues and Options stage while the submitted version of the CS attracted only 30 respondents. I can only surmise on the reasons for the seemingly underwhelming reaction to the CS. It may well be that the front-loading process achieved its intended aim. The early consultation procedures elicited changes to the CS and consultation responses were addressed during progress to the submission stage. Another explanation is the lack of controversial proposals in this DPD. The CS is a vision/objectives/strategy delivery document and, in the constrained context of this Borough, limited in its scope and aspirations. Lacking ambition even, some have suggested. These factors may have contributed to the lack of interest.
- 2.12 I find no evidence to indicate that the Council has fallen short in terms of the specific duties imposed by the Regulations or the SCI. However, I accept that more could be done, if perception from the outside is that wider engagement has to be seen to be done. I was told that a task group has been set up to re-assess engagement and consultation procedures. The findings of the group should feed into a possible future review of the SCI but, for the purposes of the CS currently being examined, the legal requirements have all been satisfied.

3 General comments on presentation and approach

- 3.1 The initial chapters of the CS give a good representation of the Borough, with its strengths and weaknesses that need addressing. Policies are helpfully supported with text which includes clear indications of implementation options. However, a number of policies are poorly worded and in some instances difficult to comprehend. The changes to wording proposed by the Council have by and large overcome those concerns.
- 3.2 Monitoring options in the submitted version of the CS are somewhat limited, due to insufficient indicators and targets. To that extent, I consider that the document does not comply with either the London Plan monitoring approach nor does it follow ODPM Good Practice Guide. Again, pre-hearing changes have largely rectified this matter. The targets and indicators introduced do not comprise new information, but incorporate elements of the Annual Monitoring Reports (AMR) in the CS, which are necessary to demonstrate the measurability of individual policies.

JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY TESTS

4 Issue 1 – Whether the vision, spatial objectives and spatial strategy are clear, appropriate and provide a sound basis for the policies.

- 4.1 The vision for the area is grouped into 3 inter-related themes “A Sustainable Future”, “Protecting Local Character” and “Meeting People’s Needs”. The themes continue into the objectives and spatial strategy which follow on from an analysis of the Borough’s characteristics and its profile, plus an understanding of the key issues facing the area.
- 4.2 Early on in the examination process I questioned whether the CS was focussed enough on Richmond’s local distinctiveness and raised concerns about its place-shaping qualities. The response from the Council (CD 7/19), and a subsequent understanding of the Borough’s context, confirm that Richmond is not an area of great change with major development allocations to be accommodated.
- 4.3 The Borough has extensive areas of protected open space and is fully built up elsewhere. Large parts of the built-up areas have Conservation Area status, and there is a considerable wealth of historic buildings. With protection

accorded to the built-up and open areas and constraints associated with the Rivers Thames and Crane, the Borough is indeed constrained. This is reflected in the housing target, which is the lowest of any London Borough. Twickenham is identified as the area of most change but even this is limited and focussed around individual sites.

- 4.4 Given the circumstances and context of the Borough, I appreciate that there is little scope for the Council to deliver a strategy much beyond the three themes, which form the basis of its policies. The spatial options are limited. As a consequence, the CS appears to lack ambition. This was demonstrated during discussions at the hearings concerning the way in which Twickenham was expected to develop. There is indeed a perception of a less than aspirational direction to the CS. On the other hand, the Borough does not possess conditions for significant change or major place-shaping. The Council's agencies/partners and other bodies have not identified the need for initiatives or actions other than those which feature in the DPD. It would be wrong, therefore, for this Council to proceed unilaterally towards more ambitious projects without the support of the Local Strategic Partnership or those it could not realistically deliver within the timescale of this DPD.
- 4.5 Taken overall, I find that the vision, spatial objectives and spatial strategy are well-founded in identified needs, reflect the distinctive characteristics of the Borough and priorities of the Community Plan, as well as the issues it faces for the next 15 years. Appendix 3 of the CS is a useful indicator of the manner in which the policies have evolved from the vision, spatial objectives and spatial strategy, as well as the evidence base to justify the approach taken. With the pre- and post hearings changes proposed, I am satisfied that they are soundly based, appropriate for the area and a good basis for the core policies.

A SUSTAINABLE FUTURE

5 Issue 2 – Whether the policies will lead to development that meets the area's needs sustainably and in accordance with national policy

- 5.1 Policies CP1 through to CP6 give land use expression to the Council's objectives of minimising impact on climate change and adapting the Borough to the effects of changing climatic conditions. The policies introduce sound, fundamental principles of promoting use of renewable energy, making effective use of land and resources, minimising adverse environmental effects of development, looking to reduce the need to travel and achieving low energy, low carbon dioxide emitting buildings.
- 5.2 The theme of sustainable and accessible locations for developments (Policy CP5) is a feature of the CS and of subsequent policies. It is fundamental to the document's core principles of sustainability. The issues and options exercise demonstrates the lack of alternative spatial strategies for development locations other than the option proposed in the CS that steers major developments to the five main town centres. In addition to which, Policy CP3 provides the basis for guarding against and adapting to the long term effects of climate change, while Policy CP4 recognises the long term benefits of conserving and enhancing the Borough's biodiversity. Sustainable waste management is addressed through the approach outlined in Policy CP6.
- 5.3 The overarching justification for these policies is undisputed. The CS reflects international and national priorities of minimising climate change. The national call for facilitating and promoting sustainable patterns of urban development is expressed in Planning Policy Statement 1 (PPS1) and its supplement, while the London Plan recognises planning as a mechanism to address climate change,

emphasising energy efficient designs and the importance of adaptation and mitigation in sustainable building design, in development patterns and waste management.

- 5.4 Locally, the Community Plan (CD 8/15) notes that the Borough has the second highest domestic carbon footprint per capita in London. The Plan also aims to raise the energy performance of existing buildings, ensure high environmental standards on new buildings and tackle climate change through an integrated approach with partners. The Borough is vulnerable to potential impacts of climate change; in particular, increased likelihood of flooding from the River Thames and its tributaries. While the most recent Climate Change Strategy (CD 8/14) focuses on the Council's own operations and services, the document also pledges to tackle the climate change issue with its stakeholding partners by reducing the Borough's adverse contributions and improving the local environment.
- 5.5 Broadly, I am satisfied that the approach of this part of the CS is justified; it is founded on a credible evidence base and is the most appropriate strategy in the face of few alternatives to combat or adapt to climate change. Effectiveness and delivery of the strategy are best tested through an assessment of individual policies.

Policies CP1 and CP2

- 5.6 With the sets of changes proposed to policy wording and supporting text, I am satisfied that the CS would provide the framework for a sustainable pattern of development. Additionally, it promotes and encourages renewable and low carbon energy generation, within the constrained context of the Borough.
- 5.7 The study by Creative Environmental Networks (CD 8/59) comprises the evidence base and economic endorsement for the carbon reduction targets and sustainable energy measures sought in the policies, which would be applied to all new and, wherever practicable, existing developments. With the changes suggested in CDs 7/12 and 7/24, Policies CP1 and CP2 would contain clear mechanisms for delivering low energy usage, low carbon emitting buildings and a development pattern focussing on accessibility, sustainability and effective use of resources. The wording change to Policy CP1.A seeks sustainability standards as an objective and therefore does not impose a more onerous requirement than PPS1.
- 5.8 The revised sets of extensive targets and indicators demonstrate that the policies can be monitored. Given the global imperative of tackling climate change, flexibility is not a good measure of effectiveness. The policies are worded to leave little room for manoeuvre, which must be the right approach in the context of the need to deliver the sustainable agenda.

Policy CP3

- 5.9 The policy introduces simple but effective measures to combat the effects of climate change. It seeks to apply the principles of water conservation, sustainable drainage and summer cooling to buildings, as well as expecting developments to address the risk of subsidence. With respect to development and flood risk, the policy draws from PPS25 in establishing the need for developments to take account of the Catchment Flood Management Plan and the Borough's Strategic Flood Risk Assessment (SFRA). It would also fall to the developer to determine the risk on an individual site basis. The SFRA (CD 8/12) and the Flood Risk and Development Sequential Test Report (CD 8/39) inform the land allocation exercise, in particular the Local Housing Availability Assessment (LHAA), as advised in PPS25. Change 33 corrects the approach of

a complete embargo to development in areas of high flood risk, which would bring the policy into line with PPS25.

- 5.10 The Catchment Flood Management Plan and the SFRA will be updated on a regular basis and provide the Council with the flexibility to determine applications or re-assess development opportunities in the light of updated flooding risk information. The policy is founded on a strong evidence base, is deliverable, flexible and capable of monitoring, provided the changes in CDs 7/12 and 7/24 are included.

Policies CP4 and CP6

- 5.11 With the sets of indicators and targets introduced through the changes proposed, the policies would contribute to the effective delivery of a greener Borough. The CS correctly recognises the importance and community desire for waste management, and safeguarding or creating biodiversity, as part of the drive to implement the area's sustainability agenda.

Policy CP5

- 5.12 Directing employment, shopping and other day to day facilities to the network of town centres is fundamental to the aim of reducing the need to travel, especially by private car. The thrust of this approach is in line with Planning Policy Guidance (PPG) 13 and London Plan objectives. The policy does not penalise car users or owners, as suggested by one respondent, but focuses on development patterns designed to promote movement by means other than the private car and to encourage modal shift. The balance of the policy towards sustainable forms of transport and seeking development patterns that exploit existing public transport opportunities by focussing on the five town centres, reflects national and regional imperatives. Equally, the provision of car free housing in areas with good public transport accessibility (such as Richmond and Twickenham) accord with the national and London Plan's emphasis on making best use of land. Restrictive parking conditions comply with the Mayor's Parking Strategy and London Plan Policy 3.C.
- 5.13 PPG13 urges local authorities to use parking policies to promote sustainable transport choices. Over-provision is discouraged, as evidenced by the London Plan Policy 3C.23. Policy CP5, in conjunction with Policy CP8, accordingly recognises the need to manage car parking, particularly in town centres. The Council's Parking sub-strategy (CD 8/21) outlines its parking policies and management of parking demand, which are designed to protect the vitality of centres and safeguard residential amenity. Policy CP5 introduces important tools in controlling parking in town centres, commuter parking and elsewhere. Any measures to reduce the balance of these controls would not chime well with the Council's commitment to a sustainable transport strategy.
- 5.14 I recognise the concerns of residents about parking pressures, consequential expansion of Controlled Parking Zones and the effects of parking restrictions on the viability or vitality of the smaller town centres, such as Teddington. However, such matters are more relevant to the Council's operational duties, and the way its parking functions are managed. Detailed standards are best addressed in future DPDs and not in the CS.
- 5.15 Much of Policy CP5 comprises statements of intent or expresses the Council's commitment to various transport initiatives. Following discussions at the hearing, a number of changes to the policy were tabled, which clarified the meaning of much of the core aspects of the policy. I endorse the basic thrust of Policy CP.5 and the way it is expressed in changes to the wording of 5.A, 5.B, 5.C, third bullet point of 5.D and 5.F (CD 7/24). The policy will provide an

effective mechanism for delivering safe, accessible, inclusive travelling conditions and for reducing the need to travel.

- 5.16 I question the usefulness of the remaining areas of the policy, in terms of guidance to potential developers or land use functions. However, the Council is anxious to convey its commitment to the range of transport related initiatives, particularly those scheduled in the Local Implementation Plan (CD 8/21). Policy CP5 does indeed give a comprehensive picture of the strategy pursued to reduce traffic congestion, increase safety and accessibility, with funding in place for implementation. Adding these to policy text does no harm, in my view, particularly as the CS specifies the manner in which the Council expects to monitor each sector of the policy. In the light of these observations, I am reluctant to recommend changes other than those listed in CD 7/12 and 7/24, as the matters do not go to the heart of the soundness of the CS.

Conclusions

- 5.17 With the changes recommended below, I find that the CS will lead to a pattern of development that meets the area's needs sustainably and addresses the effects of climate change. It is supported by an evidence base that is credible and robust, there is flexibility in the approach, wherever appropriate, and it is consistent with national policy.

Recommended Changes:

- 5.18 To make the CS sound the following changes are required:
- **Change 26 – Policy CP1.A: introduction of Council's aim to achieve Code for Sustainable Homes or BREEAM standards.**
 - **Change 27 – Paragraph 9.1.1.2: justification for above standards.**
 - **Change 28 – introduction of LDF indicators and targets to Policy CP1.**
 - **Change 29 – Policy CP2.B: "requiring" in place of "prioritising" evaluation of development and use of decentralised energy.**
 - **Change 30 – Policy CP2.C: introduces the concept of 20% reduction in carbon dioxide emission from onsite renewables.**
 - **Change 32 - introduction of LDF indicators and targets to Policy CP2.**
 - **Change 33 – Policy CP3.B: wording change to restrict development in areas of high flood risk, in place of a complete ban, and introduction of the Catchment Flood Management Plan.**
 - **Change 34 – Paragraph 9.1.3.3: wording to introduce the PPS25 sequential and exceptions testing of individual applications.**
 - **Change 36 - introduction of LDF indicators and targets to Policy CP3.**
 - **Change 38 - introduction of LDF indicators and targets to Policy CP4.**
 - **Change J-21 – Policy CP5.A, B, C: safeguarding land for transport functions plus changes to wording to ensure proper understanding of requirements.**
 - **Change J-32 – Policy 5.F – changes to wording to provide focus and clarity.**

- **Changes 43 and J-35 - introduction of LDF indicators and targets to Policy CP5.**
- **Change 44 - introduction of LDF indicators and targets to Policy CP6.**

PROTECTING LOCAL CHARACTER

6 Issue 3 – Whether the CS policies will promote and maintain quality built and natural environments and protect the distinctive character of the Borough in a sustainable manner and in accordance with national policy

Maintaining and improving the built environment

- 6.1 The Borough's rich heritage and its high quality built environment warrant a protective approach. Conservation area appraisals and statements defining local character provide justification for such an approach, if justification were needed in a Borough known for its exceptional heritage value and distinct character. Changes 45 and J-36 recognise the importance of historic interest and should be adopted.
- 6.2 On the other hand, with the need to accommodate development, the CS correctly provides for high density development to take place in areas of high accessibility. The Sustainable Urban Development Study (CD 8/29) identifies suitable locations for high density development and tall buildings. This is a considered document and a sound evidence base informing the CS on the appropriate locations for tall buildings and high density developments. It accords with the steer given in the London Plan and with advice in the English Heritage/CABE published document "Guidance on Tall Buildings" (CD 4/05). The Study should not be dismissed lightly.
- 6.3 With changes to Policy CP7 (Changes 45, J-37 and J-38), CP8 CP9 and CP14, the CS will provide a sound framework for protecting the uniquely high quality built and historic environment of the Borough, but without undermining the notion of accommodating additional development.
- 6.4 The requirement for applicants to demonstrate an understanding of physical context is an effective tool for delivering development compatible with local circumstances. Concerns about "garden land grabbing" or backland development are adequately addressed, in my view, in the wording of Policy CP7, combined with the control provided by other parts of the CS and saved policies. National policy does not preclude development on gardens. Backland development can be a valuable source of additional housing without necessarily harming an area or its amenities. I am satisfied that the general design principles expressed in the policy provide the necessary framework for delivering the high quality sought. More detailed aspects of design are properly consigned to saved policies or their successors in forthcoming DPDs.
- 6.5 There is sufficient flexibility in the system for realising imaginative schemes but without damaging the character or appearance of the existing environment. I recognise the disquiet among some respondents to the inappropriateness or poor quality of developments permitted by the Council. However, that is not an issue for the CS, but of how the Council chooses to apply or implement what I believe is a sound policy framework for achieving developments to complement their surroundings.
- 6.6 The CS additionally focuses on improvements to areas of poorer environmental quality, thus giving land use expression to the Community Plan objective of reducing relative disadvantage in the five named areas where deprivation is concentrated. Area profiles (CDs 8/47-8/51) illustrate levels of deprivation in

each of the five identified locations and the specific improvements are identified in Policy CP13.

- 6.7 I am satisfied that the CS accords with national policy on achieving developments of high quality, in terms of architectural design, accessibility, open space, inclusiveness and other aspects of good design listed in PPS1 and PPS3. Its approach to recognising local distinctiveness and protection of its valuable heritage assets is consistent with advice in PPG15.

Developing the potential of town and local centres

- 6.8 The CS puts the Borough's towns and local centres into a hierarchy based on size and function, and proposes the most appropriate type of uses within each. This approach is justified on a number of counts. PPS6 advocates the development of a hierarchy which distributes growth among centres and to address gaps in provision. The Borough hierarchy is set within the London Plan's classification of town centres across London, where Richmond is categorised as a Major Centre and the remaining four centres classified as district centres. The London Plan also urges boroughs to include spatial strategies which focus retail, leisure, key commercial activity and services in suburban centres, including district and local centres.
- 6.9 The strategy additionally flows from the key objectives of minimising the need to travel, ensuring communities have a range of shops, services and employment at local levels, while looking to develop the potentials of Richmond and the district centres as places for major and high density developments. I agree that directing high density housing, retail and employment to the five identified centres is preferable to the dispersed approach tested at the issues and options stage, and in keeping with the wider policy framework. The rationale lies in the principles of sustainability running through the DPD.
- 6.10 I endorse the Council's revision to Policy CP8 (Change J-39) which transposes the Table from paragraph 7.1.4 into the policy. This clearly indicates the approach to be applied to the range of town centre uses in each of the five individual centres. It also shows the expected modest growth in retail and employment to be accommodated in each centre, all of which is rooted in an extensive evidence base. I accept that retail requirements could change in the future and the Council is committed to updating the retail assessments with a view to accommodating growth in a review of the CS, should that become necessary.
- 6.11 Expansion of car parking areas in the town centres would not accord with national or regional aims of using parking policies to promote sustainable transport choices and reduce reliance on the car. The Council's evidence base (Local Implementation Plan, CD 8/21) and quarterly monitoring of car parks provide sufficient justification for the approach adopted in Policy CP8. It must fall to the Council to ensure that parking pressures are not exacerbated by inappropriate expansion of controlled parking zones or inappropriately located car free developments. Such matters fall within the scope of the Council's operational duties and do not go to the core of soundness of this DPD.
- 6.12 The strategy for Twickenham is based on a recognition that the centre is not performing to its full potential and that there is scope for revitalisation. This is potentially the area of most change in the Borough. A place-specific policy under such circumstances is therefore justified.
- 6.13 In line with much of the CS, future expectations for Twickenham are not far reaching. Apart from promoting the centre for a variety of normal town centre activities, including leisure and arts related uses, and managing the night time

economy, there is no strong imperative to provide anything that could materially alter the attractiveness or draw of the centre. I understand that for many years there have been repeated calls to replace the ice skating rink which closed in the 1980s. Realistically, this may not be a possibility. On the other hand, I can see that the vision required to truly revitalise Twickenham is lacking. Policy CP9 is uninspiring and limited in what it seeks to deliver. The matter does not render the CS unsound, in my view, but could be regarded as a missed opportunity for pro-active place shaping.

- 6.14 I have neither the means nor the evidence to suggest what it is the centre needs or how it could diversify to achieve more vibrancy and vitality. The task is one for the Council to initiate with the co-operation of its partners in the Local Strategic Partnership and other stakeholders to establish whether there is scope for a more ambitious and pro-active approach to the revitalisation of Twickenham. The findings could feed into a future review of the CS.
- 6.15 Matters concerning consultation or details of the options proposed for the Twickenham Riverside site are not relevant to my consideration of the soundness of the CS. Nevertheless, in the absence of radical ideas on this or any of the other redevelopment sites in Twickenham (allocated in the UDP and saved for the purposes of the development plan), the perception of a less than ambitious approach to shaping the centre will prevail.
- 6.16 I welcome the sets of indicators and targets introduced under Changes 53 and 57, as they demonstrate the monitoring potentials of Policies CP8 and CP9 and meet one of the tests of soundness. Expecting 90% of larger scale retail developments or extensions to locate within primary shopping areas is a challenging target but justified by a restrictive approach in the London Plan and by the Council's prerogative to set its own local targets.
- 6.17 In conclusion, I consider that the five centre approach deployed in the CS is based on sound sustainable principles and justified by national and regional policies. It is the most appropriate strategy for the Borough and would meet its future retail and employment needs sustainably. Policies within this spatial framework are capable of being monitored and would effectively deliver the growth or protect the roles intended for each of the centres, without compromising character or respective functions. While questioning the less than pro-active attitude to shaping the fortunes of Twickenham, the fundamental approach is sound with sufficient flexibility to allow for greater ambition in the way the centre could evolve.

Maintaining and improving the open and river environment of the Borough

- 6.18 Over one third of the land area of the Borough comprises open land, covered by one or more designations and a World Heritage Site. It is apparent that the protection of open land is longstanding and effective and contributes to the inherent character of the area. The strong protection is complemented by saved policies which allow for loss of open land in certain (often exceptional) circumstances.
- 6.19 The Open Land Study (CD8/13) reviewed land covered by protective designations and also identifies land that could be designated in the future. The study concludes that existing protections are justified and land appropriately designated. There is also the potential to designate 88 new sites. Having seen the recommendations in the study, and the nature or extent of land identified for possible future designations, I am satisfied that this could be undertaken without compromising the Borough's ability to accommodate potential growth in housing, employment or community facilities. Furthermore,

there is ample evidence to illustrate that the housing targets for the Borough can be met without removing or altering existing protective designations.

- 6.20 The Assessment of Need for Education Provision 2005/2006 (CD 8/11) shows that limited changes would be needed at school sites to address future capacity. Alterations, where necessary, would follow in subsequent DPDs. The Employment Land and Premises Study (CD 8/04) similarly recommends retention of existing employment land and new provision is to be directed to areas of high accessibility. There is no reason to allocate open land for employment purposes. The Sport and Open Space Needs Assessment 2007 (CD 8/03) indicates that there is sufficient open land in the Borough to meet the recreational needs of residents and visitors. The approach of protecting open land and areas of nature interest is longstanding, necessary and informed by the study. It would comply with national policies similarly concerned with safeguarding open environments.
- 6.21 Equally, the River Thames and Crane corridors are worthy of protection, as recognised in the London Plan Blue Ribbon network policies. Strategies defining the special character of different reaches of the Thames will inform and guide future projects in an effort to protect and enhance the river corridor and address cross-boundary issues. The Crane Valley is subject to change as a result of development sites allocated in the UDP, but Policy CP12 will adequately ensure a level of protection and improvements to the river environment through contributions from development proposals. The change in wording proposed under Change J-64 will bring certainty and clarity to the policy.
- 6.22 Given the particular distinctive circumstances of the Borough, the options for altering its open space and river environments are limited. The approach taken in the CS is the correct one and the attractiveness of the Borough is a testament to the long established, similarly protective, practices. The monitoring approach falls short of specific targets on a number of counts. However, I accept that elements of policy such as provision of open space as part of new schemes are not easily measurable, given the range of variables likely to influence levels of open space forthcoming.

Conclusions

- 6.23 With the changes recommended, I find that the CS will meet the community priorities of protecting and enhancing built and natural environments, new as well as historic. It will give spatial expression to the Community Plan's aims to increase vibrancy and prosperity in the Borough, with policies for town centres continuing the sustainable theme of the Council's strategies.

Recommended Changes

- 6.24 To make the CS sound the following changes are required:
- **Change 45: Policy CP7 – change in wording to emphasise historic interest of buildings in the Borough.**
 - **Change 47: Paragraph 9.2.1.5 – reference to the study identifying areas suitable for higher density and tall buildings developments.**
 - **Change 50: introduction of indicator and targets to Policy CP7.**
 - **Change 52 and J-40 to J-51: Policy CP8 – addition of schedule of preferred approach towards each centre added to policy plus wording change to provide clear guidance.**
 - **Change 53: introduction of indicator and targets to Policy CP8.**

- **Changes 55 and J-54-60: Policy CP9 – identifying suitability of tall buildings in the station area of Twickenham plus wording change to provide a focused and clear policy direction.**
- **Changes J-61-62: Paragraph 9.2.3.2: wording change to bring the reasons for Policy CP9 to the fore and to recognise Twickenham's accessibility by public transport.**
- **Change 57: introduction of indicator and targets to Policy CP9.**
- **Change J-63: Policy CP10 – naming of World Heritage site and assigns the task of identifying additional open land to a future DPD**
- **Change 60: Policy CP10 - identifies pocket parks and their functions.**
- **Change 61: introduction of indicator and targets to Policy CP10.**
- **Change 64: introduction of indicator and targets to Policy CP11.**
- **Change 65: introduction of indicator and targets to Policy CP12.**
- **Changes J-64-67: Policy CP12 and supporting text – change in policy wording to provide direction to future developments in the Crane Valley.**

MEETING PEOPLE'S NEEDS

7 Issue 4 - Whether the CS will provide the means to deliver and improve accessibility to homes, employment, education, health and other community facilities sustainably and in accordance with national policy.

- 7.1 The Community Plan (CD 8/15) articulates the vision for the Borough. Amongst its priorities is to reduce the gap between disadvantaged residents and the Borough average. Others look to create strong cohesive communities, which raises issues of creating an accessible, affordable and balanced housing market, access to local employment opportunities and to a range of day to day health and education facilities. The test for the CS strategy lies in the way it gives spatial expression to and delivery of these important aspects of the Community Plan.

Tackling relative disadvantage

- 7.2 The Council's measures of deprivation (CDs 47-51) form the evidence base for identifying the 5 areas where deprivation is concentrated. Policy CP13 offers opportunities for small physical improvements appropriate to the needs of each of the five areas. The intention is to improve provision of services, facilities and transport as well as the environment of the five areas, in line with the aims of the Community Plan.
- 7.3 I agree that the CS is limited in the way that it can effectively address problems within these areas, as the disadvantages do not necessarily arise from physical deprivation and there are few opportunities in these established built up areas for physical regeneration. While improvements sought in Policy CP13 may not appear ambitious, I am satisfied that, in combination with other strands of the CS, they will go some way to aligning planning in the area with the priorities in the Community Plan. Change 66 introduces targets and indicators to measure the effectiveness of the policy. These should be included.

Recommended Changes

- 7.4 To make the CS sound the following changes are required:

- **Change 66: introduction of indicator and targets to Policy CP13.**

Housing Strategy

- 7.5 PPS3 expects the planning system to deliver high quality housing, a mix of housing (market and affordable), sufficient quantity of housing in suitable locations and a flexible, responsive supply of land. In addition to which, the DPD should take account of the requirements of ODPM Circular 01/2006 "Planning for Gypsy and Traveller Caravan Sites". The soundness of the CS must therefore depend on whether it can deliver these policy objectives.

Level of Housing Provision and Location

- 7.6 Policy CP14 says that the Council will exceed its minimum strategic dwelling requirement which involves an additional 2,700 dwellings between 2007 and 2017 (at 270 dwellings per year) with an indicative capacity of 150-330 dwellings per year in the 10 years after March 2017. The figure for the first 10 years is taken from the London Plan Table 3A.1 and the annual target for the subsequent 10 years features in Appendix 10.
- 7.7 The London Plan targets are based on the Mayor's 2004 London Housing Capacity Study (CD 5/05). The joint statement issued by the Government Office for London (GOL), the Greater London Authority (GLA) and London Councils (CD 8/28) confirms that the capacity study, and therefore individual borough targets, is based on comprehensive and robust evidence. GOL and GLA further advise boroughs (CD 8/40) to roll forward their annual London Plan minimum ten year housing targets to cover the period beyond 2020 rather than undertaking individual Strategic Housing Land Availability Assessments (SHLAA). Policy CP14 correctly, in my view, follows the recommended approach and introduces a level of flexibility in recognising that the target could be altered in the light of the pan-London SHLAA.
- 7.8 Policy CP14 and its supporting text encapsulates and reflects the unique circumstances of London, which itself is predicated on a robust and tested evidence base. I have not been provided with empirical evidence or cogent reasons to depart from what is a modest annual increase in number of dwellings. To do so, would render the CS unsound for its incompatibility with the London Plan.
- 7.9 Expectations of exceeding targets must also be considered in the context of a London-wide demand and need for additional homes. As I conclude later in this report, I am satisfied that policies in this CS allow for the Borough's infrastructure requirements to keep pace with future additional homes and the level of growth anticipated can be accommodated satisfactorily.
- 7.10 Sufficient safeguards exist within Policy CP14, and other sections of the CS, to ensure that individual planning applications are determined on their own merits, in relation to site and locational circumstances and not purely in the interest of meeting annual targets, as suggested by respondents. There is sufficient flexibility in the system to allow schemes to respond to location and degree of accessibility.
- 7.11 The housing trajectory demonstrates the success of the Council's strategy to date in meeting its annual targets. Future supply could well be inhibited by current unfavourable economic circumstances. On the other hand, the Council has indicated the strategies in place to assist with a continuous supply of additional units. Their paper CD 9/06 lists the reasons for the success of its

approach and gives credence to the belief that the development rate could be maintained during periods of recession.

- 7.12 In accordance with PPS3, Policy CP14 provides broad locations and distribution of the housing provision. The February 2008 Local Housing Availability Assessment (LHAA) undertaken by the Council partly provides the basis for the intended distribution. The strategy anticipates accommodating the additional dwellings within the built up areas of the Borough. The amount of provision allocated to individual districts reflects the suitability of the areas concerned, in terms of access to community facilities, to employment opportunities, key services and infrastructure.
- 7.13 The strategy of concentration on the built up areas is at the heart of the CS which envisages no alterations to MOL or GB boundaries. The lists of identified and allocated sites in the LHAA, with permissions granted and historic trends of small sites, demonstrates that there will be no need for the Council to search beyond the urban areas or encroach on Greenfield land.

Sources of Provision

- 7.14 The February 2008 LHAA sets out the availability of known large sites and gives an estimate of where and how much housing is likely to take place. In response to my questions, a further paper was produced to update the position post-adoption, i.e. 2009/2014 (CD 8/63). The recent paper provides more detail and an up to date picture regarding phasing and delivery, and should be reflected in supporting text (paragraph 9.3.2.6). My suggested rewording is taken from the updated position provided to me by the Council.
- 7.15 Essentially, the combined evidence base confirms that the Borough is able to identify land for a potential 1834 additional units over the first five year, post-adoption, which exceeds the required 5 year supply by some 484 units. The sites listed for the first phase of the CS are anticipated to come from a range of sources and the paper demonstrates the key PPS3 requirements of availability, suitability and achievability. The Council's evidence, based on the Jacobs Babbie Flood Risk and Sequential Test Report (CD 8/39), confirms that the likely yield anticipated by the Council on identified sites would be forthcoming.
- 7.16 I explored with the Council the prospect of some of the long standing allocations and large sites coming forward within the first 5 year period. Information provided in their position statement (CD 7A/11), and at the hearing, on the individual circumstances of the sites in question (sites at Star and Garter, Greggs Bakery, Richmond and Twickenham Stations and Twickenham Post Office Sorting Office), convinces me of their likely availability.
- 7.17 The deliverable sites anticipated between the years 2014 and 2019, added to the average of small sites estimated, would give a supply of 1762 additional unit - again exceeding the target of 1350 in years 6-10. The sites for the years 11-15 are less certain. The Council it appears is aware of sites in Richmond, Twickenham and Teddington that form part of the early work on a future DPD. Issues of confidentiality prevent the sites from being identified, but the Council points to discussions with local partnerships looking to maximise use of their existing premises and a review of their estates. The exercise could bring forward land to be allocated in a future DPD. As the residential targets for future years will be led by the emerging pan-London SHLAA, the CS would need to be reviewed and the longer term sites assessed accordingly.
- 7.18 The Council's calculations of total land supply rely heavily on the small unidentified sites. Some 1706 additional units are estimated from this source. The figure is derived from the London-wide Housing Capacity study, which

gives each London borough a small sites allowance. The housing trajectory confirms that housing targets in past years have been met, and exceeded, despite the dependence on such sites. Residential completions data for the last 5 years show that on average 43% of housing has come from this source, with over 60% figures for the 2006-07 and 2007-08 periods (CD7a/11, section 5 – figures taken from Annual Monitoring Reports). The long-standing reliance on small sites reflects the reality and particular circumstances of this Borough.

Quality of Housing and Impact

- 7.19 Policy CP14 does not make reference to nor appear to adopt the residential density ranges set out in the London Plan density matrix. The density matrix takes into account the factors stated in the policy, such as context of place. According undue emphasis to such matters may not maximise the potential of sites. Change 68 to Policy CP14D addresses the issue satisfactorily and would bring the CS into line with the London Plan and PPS3.
- 7.20 That is not to say that the CS focuses on density at all costs; there is flexibility in the policy framework as a whole to ensure compatibility of new development with its surroundings as well as deliver high quality homes, in accordance with PPS3. That designs or schemes of the sort of high quality intended have not been forthcoming is a matter for the Council and the way it interprets its policies as decision maker. For my part, I am satisfied that a sound policy framework exists for delivery of developments that meet the exemplary standards intended.

Housing Choice and Identified Needs

- 7.21 Although the Code for Sustainable Homes is not yet mandatory, the requirement for all housing to be built to Lifetime Homes standards and 10% to wheelchair standards reflects Policy 3A.5 of the London Plan. It is justified on that basis and indeed also on the Government's expectations in the Code. Evidence from the Council shows that the additional costs involved in building Lifetime Homes are not considerable and would be compensated by longer term savings and cost benefits. As with all elements of the CS, the latitude offered by Section 38(6) of the Planning Act allows for individual applications to demonstrate other material considerations.
- 7.22 The rationale for the proportional split in favour of one-bedroom homes lies in the evidence base indicating a projected increase in small households and an existing housing stock dominated by 3-4 bed homes. In the light of the comparatively modest increase in residential development across the Borough, the policy is unlikely to greatly erode its character or social mix but will assist with the objective of creating mixed, balanced communities.
- 7.23 Turning to the issue of delivery of affordable homes. The Community Plan looks to achieve greater provision of affordable homes, taking into account the needs of those on low income, and to ensure that new housing development meets known needs primarily with 2-and 3-bed social rented family and intermediate dwellings.
- 7.24 Policy requirements of 50% affordable homes, the 10 units or more threshold trigger and the 80:20 proportional split between social rented and intermediate housing are driven by high land and house prices and the issue of affordability in the Borough. There is a strong evidence base for this approach which partly reflects the London Plan requirements (Policies 3A.9 and 3A.11) but is wholly supported by the GLA.
- 7.25 In the absence of a Strategic Housing Market Assessment (SHMA), the Local Housing Assessment 2007 (LHA) (CD 8/01) is an appropriate and credible

evidence base for understanding the position in the Borough, and its findings used to formulate the policy on affordable homes.

- 7.26 The LHA estimates a shortfall of some 2723 affordable units in the Borough and concludes that shared ownership is unaffordable and that social rented households are most likely to be over-crowded. It additionally concludes that the Council should maximise supply and supports the provision of a 50% target. The assessment calls for the majority of affordable homes to be provided in the form of social rented accommodation. Furthermore, the Borough's Housing Strategy 2003/2007 (CD 8/32) and draft Housing Strategy 2008-2012 (CD 8/33) identify the need for an increased supply of affordable housing to meet demand and prioritise larger family sized dwellings for social rented housing.
- 7.27 In the face of such incontrovertible evidence, the 50% provision, the 10 units threshold and departure from the London Plan on tenure split is warranted and necessary. The Financial Viability Assessment (CD 8/08) indicates that the target is sustainable but also favours financial viability appraisals on individual sites. Accordingly, there is reference in the CS to demonstrating costs and viability on sites where economic circumstances could not support the level of affordable homes required by Policy CP15.
- 7.28 I recognise the contributions from 100% affordable housing proposals to maximising supply. However, such schemes could themselves introduce pressures that may need to be mitigated through the use of planning obligations. The viability of such schemes should be as much the subject of financial testing as any other development facing economic difficulties. For that reason, I endorse deletion of text to that effect in Policy CP15.B (Change J-81) and the additional wording in supporting text (Change J-83).
- 7.29 The Council's "linked site" strategy, referred to in paragraph 9.3.3.4 of the CS, involves disposal and redevelopment of large Council owned sites, with no on-site affordable units to be provided as part of the new development, but relying on off-site contributions to fund the redevelopment of smaller Council owned sites. The smaller sites are surplus to requirement, generally fall below the size threshold of Policy CP15 and are intended for redevelopment to provide 100% affordable housing.
- 7.30 The strategy is causing some disquiet locally. It raises questions of precedence for sites in private ownership, potential conflict with policy requirements to create mixed/balanced communities and the likelihood of eroding local character through development of small sites that contribute to a neighbourhood and that would otherwise not be developed.
- 7.31 The linked site strategy forms part of the Council's Asset Management Plan. Rightly or wrongly, it is also one of a number of initiatives introduced by the Council to increase supply of affordable homes in the Borough. In the interest of transparency and completeness, the practice warrants a reference in the CS. That is not to say that I agree or disagree with the strategy or the manner in which the Council is treating redevelopment of the two large sites referred to by respondents. It remains for the Council to decide how it manages its assets and to balance conflicts or departures from its own planning policies with the benefits or harm that might occur when assessing applications for planning permission. For my part, while recognising respondents' genuine concerns, my remit is confined to assessing the soundness of this CS and not how the Council controls its assets or applies its policies.

Accommodation for Gypsies and Travellers

- 7.32 Responses from GOL and GLA to Policy CP 14.C elicited Change 67, which commits the Council to protecting existing sites for gypsy and traveller accommodation. However, without setting out criteria for location of gypsy and traveller sites, the CS is not consistent with national policy, as expressed in ODPM Circular 01/2006. Changes J-70 to 73 and J-75 to 77, identify a need for a further 2-11 pitches in the Borough (based on the London wide Gypsy and Traveller Accommodation Assessment (CDs 8/61 and 8/61A) and introduce the concept of a criteria based policy for assessing new sites.
- 7.33 While the changed supporting text recognises that few opportunities will arise for further provision, the Council needs to commit itself to identifying sites in a subsequent DPD. This is necessary to comply with the Circular advice to translate the number of pitches in the RSS (in this case the London Plan) into site specific allocations, and to align the CS with Policy 3A.14 of the London Plan. I recommend accordingly.

Monitoring

- 7.34 The Council introduced new indicators and targets which confirm the monitoring credentials of Policies CP13-15. I endorse inclusion of these changes (Changes 66, 71, 72, J-69 and J-78), as the measurable targets comprise indicators of delivery and effectiveness as well as triggers for action, should that be necessary.

Conclusions

- 7.35 With the changes proposed below, I am satisfied that the housing policies are soundly based, appropriate for the Borough, effective and deliverable. There is flexibility to allow for changes in the Council's actions should the policy aims not be forthcoming. I also find that the CS is consistent with national housing policies.

Recommended Changes

- 7.36 To make the CS sound the following changes are required:

- **Change 67: Policy CP14.C – protection of existing gypsy and traveller site.**
- **Changes J-70 to 71: Policy CP14.C- identifying need for further pitches and limited (in place of few) opportunities for gypsy and traveller accommodation.**
- **In place of Change J-72 include the following text to the end of the first paragraph of Policy CP 14 C:
Site/s will be allocated as part of the Site Allocations Development Plan Document.**
- **Change J-73: Policy CP14.C – new criteria based policies for assessing new gypsy and traveller sites.**
- **Change 68: Policy CP14.D – new policy wording to provide guidance on housing density and introducing reference to the London Plan Density Matrix.**
- **Changes 71 & 72: introduction of indicator and targets to Policies CP14 and CP15, respectively.**
- **Re-word the first sentence of paragraph 9.3.2.6 as follows:
On the basis of current large site commitments and the assumptions made in the London Housing Capacity Study about**

small sites coming forward, the phasing of development is anticipated to be 1714-1834 units in the five years 2009-2014 and 1012 units during the five years 2014-2019.

Changes J-81 and J-83: Policy 15.B – removal of text from policy concerning 100% affordable housing schemes and additional text in supporting paragraph 9.3.3.7.

Delivering infrastructure, health, education and employment facilities

Infrastructure, health and education

- 7.37 In its response to me, the Council indicated that the relatively limited future growth in the Borough will not lead to specific infrastructure requirements. Provision will be met through expansion of existing facilities (CD 7/19). I understand that the need for new facilities is generally driven by existing quantitative or qualitative shortfall rather than future increases in developments. Consultation at the preferred options stage and responses to the submitted CS from service providers and agencies do not imply an urgent need for infrastructure planning or that there are obstacles to accommodating the modest growth anticipated. There is nothing of substance in any of the submissions made to me to indicate long term capacity problems.
- 7.38 The evidence suggests that the CS draws from the strategies/plans of other agencies or partners in the way that policies anticipate future outcomes, such as improvements in the five areas forming the subject of Policy CP13, additional health care and educational facilities identified in changes to Policies CP17 and CP18 respectively. The emphasis is mostly on improvements to existing facilities, protecting existing amenities or modest increases. With the changes set out below, and the saved policy framework, I find that the CS makes adequate provision for delivering the infrastructure and community needs of the Borough sustainably and effectively, in the way required by national policy. The indicators and targets proposed in the changes demonstrate measurability and should be adopted.

Employment

- 7.39 The London Plan promotes opportunities to secure increased self-sufficiency in the South sub-region, and Richmond falls within the borough level grouping of "Restricted transfer of industrial sites" in the Industrial Capacity SPG supporting the London Plan (CD 5/04). The Employment Land Study June 2006 (CD 8/04) confirms that there is very limited amount of employment land in the Borough. The study went on to find increasing demand for office and warehousing uses alongside a shortage of space, and recommends protecting all suitable employment sites. Pressure on local employment land is identified as one of the key issues for the Borough. The CS preferred options evidence base confirms that the Borough has a substantial local economy comprising mainly small businesses serving local residents and local firms.
- 7.40 The approach adopted in the CS is one of caution, insofar as Policy CP19 seeks to retain the majority of existing employment sites and encourage additional workspace to meet the needs of a range of business and small firms. The aim is to ensure survival of local businesses, encourage local employment opportunities and to direct larger commercial operations, or those likely to generate significant journeys, to locations with high accessibility by public transport – namely Richmond and Twickenham. Equally, Policy CP20 is supportive of a sustainable tourist industry and recognises the popularity of the Borough as a tourist destination.
- 7.41 The approach is justified at a number of levels. The Community Plan aims to create and enhance local communities, bring local employment opportunities to

people that cannot afford or are unable to commute distances. The sustainable advantages of the approach are undisputed and it recognises, as does the London Plan SPG, that there are low levels of industrial land relative to demand. In these circumstances, I agree that there is a strong case for the Borough to protect all existing employment sites unless inherently unsuitable for business use. This is recognised in supporting text at paragraph 9.3.7.3 and accords a level of flexibility to the policy.

- 7.42 I agree that businesses providing employment extend beyond the traditional Class B uses classes. Again, paragraph 9.3.7.3 recognises this position and a more detailed approach to employment definition should be included in a development control DPD.
- 7.43 The Council proposes to expand on specific targets and indicators. With the changes, there would be clear measurable targets in relation to Policies CP19 and CP20. I question the value of the two indicators for Policy CP20 but would not cast that as a failure of soundness. The target of loss of employment floorspace of no more than 500 sqm per annum is predicated on the Council's completions and monitoring data (CDs 7/10 and 8/07). While challenging, it has been used for some years and is justified on the basis of shortage of employment land. I endorse the changes proposed, including those that improve clarity and direction of Policy CP19.
- 7.44 With these changes in mind, I am satisfied that the CS contains sound and credible employment and tourist strategies for the particular circumstances of the Borough. They would meet the national policy objectives of supporting economic development by planning effectively and also factoring in environmental and social issues (PPG4 and draft PPS4).

Recommended Changes

- 7.45 To make the CS sound the following changes are required:
- **Change 74: introduction of indicator and targets to Policy CP16.**
 - **Change 75: Policy CP17: additional wording to identify place-specific health care needs in the Borough, to safeguard land for the uses and to focus facilities to sustainable locations.**
 - **Changes J-84 and J-85: Policy CP17 – wording change to remove ambiguity and clarify delivery of policy aims.**
 - **Change 77: introduction of indicator and targets to Policy CP17.**
 - **Changes 78 and 79: Policy CP18 – wording change to clarify direction of policy in terms of specific future educational requirements, safeguarding of land and the manner in which the needs are to be delivered.**
 - **Change 80: introduction of indicator and targets to Policy CP18.**
 - **Changes J-86, 87, 88, 89 and 90: Policy CP19 – wording change to clarify delivery of policy aims.**
 - **Changes 81 and J-91: introduction of indicator and targets to Policy CP19.**
 - **Change 82: introduction of indicator and targets to Policy CP20.**

8 Minor Changes

- 8.1 The Council wishes to make a number of minor changes to the submitted DPD in order to clarify, correct and update various parts of the text. They have also

suggested deleting large areas of background information, which do not add to the CS as a document for developing subsequent DPDS. These changes do not address key aspects of soundness. I endorse them in the interests of clarity, accuracy and brevity. The changes are contained in CDs 7/12 and 7/24.

9 Overall Conclusions

- 9.1 I conclude that, with the amendments I recommend, the London Borough of Richmond upon Thames Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the tests of soundness in PPS12.

Ava Wood
INSPECTOR

Annexe A

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
29, J-15	Policy CP2.B	2.7	Change to: The Council will require the evaluation, development and use of decentralised energy in appropriate development.
30	Policy CP2.C	2.7	Change to: The Council will increase the use of renewable energy by requiring all new development to achieve a reduction in carbon dioxide emissions of 20% from onsite renewable energy generation unless it can be demonstrated that such provision is not feasible, and by promoting its use in existing
39	Policy CP5.B	2.7	after 2 nd sentence add "Land for transport functions will be safeguarded"
67, J-70 to J-73	Policy CP14.C	2.7, 7.32, 7.33, 7.36	Change to: Residential proposals will be assessed for the contribution to meeting housing need for all sections of the community. The London wide Gypsy and Traveller Accommodation Assessment has identified a need for a further 2-11 pitches in the Borough. The shortage and cost of land mean that there will be limited opportunities for gypsy and traveller accommodation in addition to the existing site which will be protected. The Borough will work with partners, RSLs, developers and neighbouring Authorities to seek to meet identified need. Sites will be allocated as part of the Site Allocations Development Plan Document. Sites, for temporary or permanent use should meet the following criteria: 1. The site can provide for a satisfactory arrangement of pitches, permanent buildings and open space; 2. The use of the site would have no significant adverse effect on the amenity of occupiers of adjoining land; 3. The use of the site would be acceptable in terms of the visual amenity; and 4. The use could be supported by adequate social infrastructure in the locality
68	Policy CP14.D	7.19 & 7.20	Add new Policy CP14.D as follows: The density of residential proposals should take into account the need to achieve the maximum intensity of use compatible with local context, while respecting the quality, character and amenity of established neighbourhoods and environmental and ecological policies. The London Plan Density Matrix and other policies will be taken into account to assess the density of proposals.
26, J-03, to J-12	Policy CP1	5.7	Change to: 1.A The policy seeks to maximise the effective use of

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			<p>resources including land, water and energy, and assist in reducing any long term adverse environmental impacts of development. Development will be required to conform to the Sustainable Construction checklist, including the requirement to meet the Code for Sustainable Homes level 3 (for new homes), Ecohomes 'excellent' (for conversions) or BREEAM 'excellent' (for other types of development). This requirement will be adjusted in future years through subsequent DPDs, to take into account prevailing standards in the Code for Sustainable Homes and any other national guidance, and ensure these standards are met or exceeded.</p> <p>The following principles will be promoted: -</p> <p>1.B Appropriate location of land uses.</p> <p>Facilities and services should be provided at the appropriate level locally, taking account of the network of town centres identified in policy CP8.</p> <p>Higher density residential and mixed use developments to be in town centres, near to public transport to reduce the need to travel by car.</p> <p>1.C Making best use of land</p> <p>The use of existing and proposed new facilities should be maximised through management initiatives, such as co-location or dual use.</p> <p>Redevelopment of sites should normally only take place where there can be an increase in the number of housing units and/or quantity of commercial floorspace.</p> <p>1.D Reducing environmental impact</p> <p>The environmental benefits of retaining and, where appropriate, refurbishing existing buildings, should be compared against re-development.</p> <p>Development should seek to minimise the use of open land for development and maintain the natural vegetation, especially trees, where possible.</p> <p>Local environmental impacts of development with respect to factors such as noise, air quality and contamination should be minimised.</p> <p>1.Environmental gain to compensate for any environmental cost of development will be sought.</p>
27	Paragraph 9.1.1.2	5.7	<p>Change to:</p> <p>The Sustainable Construction Checklist SPD was formally adopted by the Council in 2006 and is applied to development that meets relevant size criteria (this will be subject to review). Developers are required to submit a Sustainability Statement with their application to show how the requirements of the 18 themes within the checklist have been met through the proposed new development. This Statement should include Code for Sustainable Homes / Ecohomes / BREEAM certification to ensure that the borough's new developments meet high environmental standards and contribute, particularly through energy efficiency and water</p>

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			<p>conservation, to the Government's targets for carbon reduction (the main target being to achieve zero carbon emissions for all new homes by 2016), and to the Mayor's sustainable construction priorities.</p>
28	Paragraph 9.1.1.7	5.8	<p>Targets and Monitoring Replace with: - LDF Indicator Percentage of all new/converted housing to be built on previously developed land (as a percentage of all new and converted dwellings). Target 95% of all new/converted housing to be built on previously developed land (as a percentage of all new and converted dwellings). Family AMR, DCLG, COI H3, GLA KPI 1, SA <u>Note that this indicator is repeated in CP14</u></p> <p>LDF Indicator Percentage of new dwellings (gross) completed in each of the 3 net density ranges (>30, 30-50 & 50+ dw/ha) as a percentage of total dwellings (gross) completed per annum. Definition of net density is set out in PPS 3. Target Less than 30 dwellings per hectare – no more than 10% of gross units completed. From 30-50 dwellings per hectare – at least 10% of gross units completed Over 50 dwellings per hectare – at least 80% of gross units completed.</p> <p>Family AMR, SA <u>Note that this indicator is repeated in CP14</u></p> <p>LDF Indicator Proportion of new build homes meeting Code for Sustainable Homes level 3, conversions meeting Ecohomes "excellent" standard and commercial buildings meeting BREEAM "excellent" standard (or any subsequent new applicable standards). Target 95% of all development over 5 residential units meeting CSH level 3/ Ecohomes "excellent" standard (for conversions). 95% of all commercial development above 1000 m2 meeting BREEAM "excellent" standard (thresholds under review). Family AMR, SA</p> <p>LDF Indicator Number of contaminated land sites remediated per year Target 5 sites per year Family AMR</p> <p>LDF Indicator Number of days per annum when PM10 (particulate matter of less than 10 microns diameter) exceeds 50 micrograms per cubic metre, measured as a 24 hour mean. Target PM10 level not to exceed 50 micrograms per cubic metre more than 35 times a year at any measuring site. Family</p>

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			AMR, LSDC QOL 14, SA, AC QOL 24 (refers to (all) key pollutants)
32	Paragraph 9.1.2.7	5.8	<p>Targets and Monitoring Replace with: - LDF Indicator Proportion of end user CO2 emissions as a percentage of the per capita CO2 emissions from the 2005 baseline year. Target Per capita reduction in CO2 emissions, exact target to be developed when DEFRA data are available. Family New AMR, NI 186, GLA KPI 22, LSDC QOL 12 (iii) & 15, AC QOL 25, RTPI SPOI 4.1</p> <p>LDF Indicator Amount of CO2 emissions as a result of Local Authority operations. Target Target to be set March 09 – set out in LAA. (Includes buildings, travel, street lighting and eventually to include outsourced services). Family New AMR, NI 185</p> <p>LDF Indicator Percentage of predicted site CO2 emissions offset through the use of on-site renewable energy for new developments subject to energy assessments. Target 15% of predicted site CO2 emissions offset through the use of on-site renewable energy for new developments subject to energy assessments Family GLA KPI 22 (aim similar), New AMR</p> <p>LDF Indicator Number of new developments with renewable energy features, by capacity and type. Target n/a Family London Plan, AMR, DCLG COI E3</p>
33	Policy 3.B	5.9, 5.10	<p>Change to:</p> <p>Development in areas of high flood risk will be restricted, in accordance with PPS 25, and using the Environment Agency's Catchment Flood Management Plan, the Borough's Strategic Flood Risk Assessment and site level assessments to determine risk.</p>
34	Paragraph 9.1.3.3	5.9	<p>Change to:</p> <p>Although there are some localised drainage issues, the main risk in the Borough is from both fluvial and tidal flooding from the River Thames and its tributaries (the River Crane and the Beverley Brook). In accordance with PPS 25 the Council will apply the Sequential Test and Exception test to any Site Allocations and when dealing with applications in areas of flood risk. The Council's Strategic Flood Risk Assessment and advice from the Environment Agency can be used to identify the strategic flood risk which will then need to be assessed at site level when development is proposed. The site level flood risk assessment will need to demonstrate to the satisfaction of the Council that any flood risks to the development, or</p>

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			<p>additional risk arising from the proposal will be successfully managed with the minimum environmental effect, and that necessary flood risk management measures are sufficiently funded to ensure that the site can be developed and occupied safely throughout its proposed lifetime. The Council will in principle support measures proposed by Thames Water, the Environment Agency and the Emergency Services and others to reduce flood risk, including increasing the quality of the floodplain, defend areas at risk and mitigate the effects of flooding through sustainable drainage and other measures.</p>
36	Paragraph 9.1.3.10	5.10	<p>Targets and Monitoring Replace with: - LDF Indicator Proportion of development with surface water run-off rates equivalent to or better than previous rates, as assessed under Code for Sustainable Homes / BREEAM. Target 80% of developments have surface water run-off rates equivalent to or better than previous rates Family New AMR</p> <p>LDF Indicator Percentage of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds. Target No planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds. Family DCLG COI E1</p> <p>LDF Indicator Progress towards flood and coastal risk management. Target 70% of Thames Catchment Flood Management Plan (CFMP) actions by end of 2008/2009, 90% of Thames CFMP actions by end of 2009/2010, 90% of Thames CFMP actions by end of 2010/2011. Engage at appropriate level in partnership taking forward the TE 2100 plan (Thames Estuary). Family New AMR, NI 189</p>
38	Paragraph 9.1.4.5	5.11	<p>Targets and Monitoring Replace with: - LDF Indicator Loss of or inappropriate development on designated SSSIs, and Other Sites of Nature Importance. Target No loss of or inappropriate development on designated SSSIs, and Other Sites of Nature Importance. Family GLA KPI 18 (SINCs), SA, AMR, RTP1 SPOI 3.1, DCLG COI E2</p> <p>LDF Indicator Area of borough deficient in access to Sites of Nature Importance (hectares) (includes SSSIs and Other Sites of Nature importance) Target 10% reduction in area of borough deficient in access to Sites of Nature Importance by 2014, another 10% by 2019, another 10% by 2014 (using 2009 as baseline). Family AMR</p>

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			<p>LDF Indicator Percentage of land designated as a Site of Special Scientific Interest found to be in a favourable condition (as assessed by Natural England).</p> <p>Target 100% of land designated as SSSI found to be in a favourable condition</p> <p>Family AMR, AC QOL 30(a), DCLG COI E2</p> <p>LDF Indicator Proportion of Local Sites (includes SSSIs and Other Sites of Nature importance) where positive conservation management has been or is being implemented.</p> <p>Target 95% of Local Sites where positive conservation management has been or is being implemented.</p> <p>Family NI 197, DCLG COI E2, New AMR</p>
39, J-21 J-32	Policy CP5	5.15, 5.16	<p>Change to:</p> <p>5.A The need for travel will be reduced by the provision of employment, shops and services at the most appropriate level locally, within the network of town centres identified in CP 8. To implement this policy the Council will:</p> <ul style="list-style-type: none"> • protect and enhance local facilities and employment to reduce the need to travel. • require developments which would generate significant amounts of travel to be located on sites well served by public transport. <p>5.B In promoting safe, sustainable and accessible transport modes such as walking, cycling and public transport—in association with its partners, the Council will seek to: -</p> <p>5.C Land for transport</p> <ul style="list-style-type: none"> • safeguard land for existing and proposed transport functions • reflect the above priorities in the allocation of road spaces as part of the Parallel Initiatives Programme. <p>5.D Cycling and Walking</p> <ul style="list-style-type: none"> • give priority to pedestrians, including those with disabilities, particularly in Richmond town centre and the district and local shopping centres. • provide and promote a well designed bicycle and walking network across the Borough (the Strategic Walks Network, Richmond Borough Cycle Network and London Cycle Network Plus), and improve conditions for cyclists and pedestrians elsewhere, • Prioritise the needs of pedestrians and cyclists in the design of new developments including links to existing networks and requiring the provision of adequate cycle parking. • investigate the possibility of a footbridge across the Thames between Ham and Twickenham for pedestrians and cyclists. <p>5.E Public Transport</p> <ul style="list-style-type: none"> • improve provision for buses particularly in Richmond and Twickenham town centres, and seek to improve

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			<p>bus services within River Crane Corridor through the implementation of development proposals.</p> <ul style="list-style-type: none"> • achieve integration and convenient interchange facilities at all the borough's stations. • seek improvements to orbital public transport including rail access to Heathrow. • improve walking, cycling and public transport in areas less well served by public transport including some of the areas of relative deprivation <p>5.E Congestion and Pollution</p> <ul style="list-style-type: none"> • undertake traffic management measures to reduce the impact of traffic particularly in Richmond Town centre, the district and local centres, residential areas and streets unsuitable for through traffic. <p>5.F Car parking and travel</p> <ul style="list-style-type: none"> • require new car free housing in Richmond and Twickenham town centres and in other areas where there is good public transport and elsewhere have regard to maximum parking standards. • Require car share facilities and car clubs in appropriate new developments and encourage the use of low emission motor vehicles in order to reduce congestion and pollution. • discourage commuter parking particularly by giving priority to residents' needs. • limit any further expansion of parking in town and local centres and manage parking controls to help maintain the vitality and viability of the centres, including the evening economy. <p>5.G Sustainable travel</p> <ul style="list-style-type: none"> • encourage major employers and schools to develop Green Travel Plans and require these where appropriate with planning applications. • Require all major developments to submit a Transport Assessment based on TfL's Best Practice Guidance. • Encourage efficient, safe and sustainable freight transport. • Encourage river transport through retention and support for new transport infrastructure. <p>5.H The Council will support measures to minimise the impacts of Heathrow, particularly on traffic and noise on the Borough and will oppose changes that increase local impacts. Specifically it will seek the support of BAA, the Government and relevant statutory authorities for the following measures:</p> <ol style="list-style-type: none"> a) maintenance of the 480,000 limit on total air transport movements; b) maintenance of the current system of segregated mode; c) maintenance of the current noise preferential routes; d) the discontinuation of night flights; e) restrictions of the use of private cars and

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			improvements to public transport including a southern rail link.
43,J-35	Paragraph 9.1.5.15	5.16	<p>Targets and Monitoring</p> <p>LDF Indicator Percentage of completed non-residential development complying with maximum parking standards set out in saved UDP and then DCDPD once adopted.</p> <p>Target All completed non-residential development to comply with maximum parking standards set out in UDP/ LDF Family AMR, Former DCLG COI 3a</p> <p>LDF Indicator Number of workplace travel plans secured per annum</p> <p>Target Fifteen travel plans secured per annum Family AMR</p> <p>LDF Indicator Number of School Travel Plans in place</p> <p>Target All schools to have a travel plan by 2009, thereafter to be annually monitored and reviewed every 3 years Family New AMR, CP</p> <p>LDF Indicator Number of households registered with a car club</p> <p>Target Target to be developed when time series data are available Family New AMR</p> <p>LDF Indicator The percentage of total length of footpaths and other rights of way which were easy to use by members of the public.</p> <p>Target 95% of footpaths easy to use by the public Family AMR, former BVPI</p> <p>LDF Indicator Mode of travel usually used to travel to school</p> <p>Target 50% of schools to meet own targets (schools set their own targets to reduce travel by car). Family NI 198, LSDC QOL 11, New AMR</p> <p>LDF Indicator Working age people with access to employment by public transport (and other specified modes).</p> <p>Target Target to be devised when time series data available. Family NI 176, New AMR</p> <p>LDF Indicator Average journey time per mile during the morning peak.</p> <p>Target Target to be devised when time series data available. Family NI 167, RTPI SPOI 4.3, New AMR</p>

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			<p>LDF Indicator Progress on completion of London Cycle Network Target Borough section of London Cycle Network (LCN+) 53% complete by 2007/2008, 75% complete by 2008/9 and 100% complete by 2009/10 Family CP, New AMR</p> <p>LDF Indicator Percentage of new employment floorspace located within Richmond and the district centre boundaries Target At least 75% of new employment floorspace located within Richmond and the district centre boundaries Family AMR, DCLG, COI BD4 (in part) (currently indicator for CP19)</p> <p>LDF Indicator Loss of land used for transport purposes Target No net loss of land used for transport purposes Indicator Allocation of road space to sustainable modes (Parallel Initiatives Programme) Target To be determined once Programme starts in 2009</p> <p>LDF Indicator Progress on Ham/Twickenham Footbridge Target N/a – at feasibility stage, will include within proposals monitoring if this goes forward as a site allocation</p> <p>LDF Indicator Progress on public transport improvements within Richmond town centre and the district centre boundaries Target N/A Family New AMR (currently indicator for CP 8)</p> <p>LDF Indicator Progress on the development of the four sites in accordance with SPG and assessment of the financial and wider benefits to the River Crane Corridor Target Annual progress to be made, no specific target Family New AMR (currently indicator for CP 11)</p> <p>LDF Indicator Progress on the implementation of parking controls to discourage commuter parking Target Annual review of changes to be carried out, progress to be made, no specific target Family New AMR</p> <p>LDF Indicator Level of parking in town and local centres and parking controls Target Annual review of changes to be carried out, - target to limit</p>

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			<p>any further expansion of parking in town and local centres and manage parking controls to help maintain the vitality and viability of the centres, including at night. Family New AMR</p> <p>LDF Indicator number of pedestrians killed or seriously injured in road accidents Target New regional target set in line with Mayor's targets. LBRuT target of 90 for 2006/7 – to be updated for subsequent years Family BVPI 99 a,</p> <p>LDF Indicator Progress on a) to e) of 5.1 of policy Target Annual Monitoring to review whether a)-e) have been met Family New AMR</p>
44	Paragraph 9.1.6.5	5.11	<p>Targets and Monitoring Replace with: - LDF Indicator Capacity of new waste management facilities by waste planning authority by type Target n/a Family DCLG COI W1, AMR</p> <p>LDF Indicator Amount of municipal waste arising, and managed by waste planning authority, by management type Target Reduce amount of municipal waste arisings by 5% (from 2007/8 base) by 2010 and by 10% (from 2010/11 base) by 2017 Family CP, AMR, DCLG COI W2, LSDC QOL 12(ii), AC QOL 29, NI 191 (per household)</p> <p>LDF Indicator Percentage of municipal waste (i) recycled and (ii) composted Target Increase the percentage of municipal waste recycled and composted to at least 40% by 2010, 50% by 2020 Family CP, NI 192, GLA KPI 19, AMR, re: recycling – LSDC QOL 6, AC QOL 29</p> <p>LDF Indicator Percentage of municipal waste land filled Target</p> <ul style="list-style-type: none"> • At least half of total waste arisings diverted from landfill by 2017 from 2010/2011 base. • Family • DCLG COI W1, AMR, CP, NI 193 •
45,J-36, J-37	Policy CP7 and paragraph 9.2.1.1	6.1	<p>Change to: 7.A Existing buildings and areas in the Borough of</p>

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			<p>recognised high quality and historic interest will be protected from inappropriate development and enhanced sensitively and opportunities will be taken to improve areas of poorer environmental quality, including within the areas of relative disadvantage of Castlenau, Ham, Hampton Nurserylands, Heathfield and Mortlake.</p> <p>7.B All new development should recognise distinctive local character and contribute to creating places of a high architectural and urban design quality that are well used and valued. Proposals will have to illustrate that they:</p> <p>(i) are based on an analysis and understanding of the Borough's development patterns, features and views, public transport accessibility and maintaining appropriate levels of amenity;</p> <p>(ii) connect positively with their surroundings to create safe and inclusive places through the use of good design principles including layout, form, scale, materials, natural surveillance and orientation, and sustainable construction.</p> <p>9.2.1.1 Justification</p> <p>9.2.1.2 The Borough is locally distinctive by virtue of its a very high environmental quality and historic environment which can be defined by: the River Thames which bisects the Borough, numerous conservation areas, listed buildings and buildings of townscape merit (locally listed buildings), scheduled ancient monuments and sites of archaeological interest including Hampton Court Palace, registered parks and gardens of special historic interest and other designated parkland and open space including the Royal Parks, the World Heritage Site at Kew Gardens and important strategic and local views, including the protected vista from Richmond Park towards St Pauls Cathedral. Views and landmarks that are particular important to the Borough's local architectural character will be identified on the Proposals Map and in supplementary planning documents, where appropriate. Areas of poorer environmental quality also exist in the areas of relative disadvantage and a public realm improvement programme is under way.</p>
47	Paragraph 9.2.1.5	6.2	<p>Change to:</p> <p>Large parts of the Borough are sensitive to the impact of taller buildings by virtue of the high environmental quality that currently exists, with heritage and open space constraints and their lower density character and development patterns. However it is recognised that in some instance density can be increased, making better use of land without the need for taller buildings, through good design, layout and mix of uses. In general, a tall building is defined by CABE and English Heritage as one that is substantially taller than its neighbours or significantly changes the skyline. In this Borough large scale development is as buildings of generally 6 storeys in height-</p> <p>A study by Turley Associates has identified those areas most suitable within the borough for higher densities and tall buildings, by mapping various constraints and accessibility levels. This will be used as local guidance when determining applications</p>
50	Paragraph 9.2.1.12	6.22	<p>Targets and Monitoring Replace with : LDF Indicator</p>

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			<p>Number of Listed Buildings or Buildings of Townscape Merit demolished Target No net loss through demolition of Listed Buildings or Buildings of Townscape Merit Family AMR</p> <p>LDF Indicator The level of satisfaction with the design and layout of new housing schemes Target 85% of respondents to the Council's New Housing Survey satisfied with the layout and design of new housing (measured at least every 3 years). Family DCLG COI H6 (similar), New AMR</p> <p>LDF Indicator Number of Environmental Improvement Schemes implemented per annum Target At least 3 schemes implemented per annum Family New AMR</p>
52, J-39 to J-51	Policy CP8	6.10	<p>Replace 8.C with*: * See Table at the end of this Annex</p>
53	Paragraph 9.2.2.10	6.16	<p>Targets and Monitoring Replace with: - LDF Indicator Percentage of larger scale (500m2 gross and above) new retail development/ extensions to be located within the primary shopping areas of Richmond and the district centres or an appropriate site included in the Site Allocations DPD Target 90% of all larger scale (500m2 gross and above) new retail development/extensions to be located within the primary shopping areas of Richmond and the district centres or an appropriate site included in the Site Allocations DPD. Family AMR, SA, DCLG COI BD4 (variation of)</p> <p>LDF Indicator (CP 8 & CP 9.) Proportion of retail (A1) uses in key shopping frontages. Target Maintain proportion of retail uses in key shopping frontages at existing levels. Family AMR</p> <p>LDF Indicator Vacancy rates within designated shopping frontages for Richmond, the district and local centres Target Maintain vacancy levels below the national average within designated shopping frontages for Richmond, the district and local centres. * (UK average as per Map Info Centre Reports) Family New AMR</p>

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			<p>LDF Indicator Percentage of completed floorspace (gross & net) for town centre uses (A1, A2, B1a and D2) within town centre boundaries or within, adjacent to or well-related to designated shopping frontages where town centre boundaries not defined.</p> <p>Target 90% of completed floorspace (gross & net) for town centre uses (A1, A2, B1a and D2) within town centre boundaries and mixed use areas (where town centre boundaries not defined).</p> <p>Family AMR, DCLG COI BD 4</p> <p>LDF Indicator Number of environmental improvement schemes implemented per annum within Richmond town centre and the district centre boundaries</p> <p>Target At least 2 schemes implemented per annum</p> <p>Family New AMR</p> <p>LDF Indicator Progress on public transport improvements within Richmond town centre and the district centre boundaries.</p> <p>Target n/a</p> <p>Family New AMR</p>
57	Paragraph 9.2.3.9	6.16	<p>Targets and Monitoring Replace with: -</p> <p>LDF Indicator Progress on Twickenham Town Centre Management Board's Annual Action Plan</p> <p>Target 75% of actions in TTCM Annual Action Plan to be implemented each year</p> <p>Family New AMR</p> <p>LDF Indicator Number of environmental improvement schemes implemented within Twickenham town centre boundary.</p> <p>Target At least 1 scheme implemented per annum</p> <p>Family New AMR</p>
J-63	Policy CP10A & 10B	6.19	<p>Change to:</p> <p>10.A The Borough's green belt, metropolitan open land and other open land of townscape importance, World Heritage Sites (Royal Botanic Gardens, Kew), land on the Register of Parks and Gardens of Special Historic Interest, green chains and green corridors will be safeguarded and improved for biodiversity, sport recreation and heritage and for visual reasons.</p> <p>10.B A number of additional areas of open land of townscape importance, will be identified and will be brought forward through the Development DPD.</p>
61	Paragraph 9.2.4.8	6.22	Targets and Monitoring

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			<p>Replace with: -</p> <p>LDF Indicator Loss/inappropriate development on designated open spaces (Metropolitan Open Land, Green Belt and Other Open Land of Townscape Importance).</p> <p>Target No loss/inappropriate development on designated open spaces (Metropolitan Open Land, Green Belt and Other Open Land of Townscape Importance).</p> <p>Family AMR, GLA KPI 3</p> <p>LDF Indicator Loss/inappropriate development on designated public open space</p> <p>Target No net loss/inappropriate development on designated public open space</p> <p>Family AMR</p> <p>LDF Indicator Amount of new open space created as part of new development completed</p> <p>Target N/a</p> <p>Family New AMR</p> <p>LDF Indicator Funding raised through developer contributions towards improvements to existing open spaces.</p> <p>Target N/a</p> <p>Family New AMR</p>
64	Paragraph 9.2.5.6	3.2	<p>Targets and Monitoring</p> <p>Replace with: -</p> <p>LDF Indicator Progress on action plans of Thames Landscape Strategy and Thames Strategy</p> <p>Target 75% of actions in Annual Action Plans to be implemented each year</p> <p>Family New AMR</p>
65	Paragraph 9.2.6.8	3.2	<p>Targets and Monitoring</p> <p>Replace with:</p> <p>LDF Indicator Progress on the development of the four sites (Richmond College, Central Depot, Post Office Sorting Office, and Harlequins) in accordance with SPG and assessment of financial and wider benefits to the River Crane Corridor.</p> <p>Target Annual progress to be made, no specific target</p> <p>Family New AMR</p>
J-64	Policy CP12	6.21	<p>Change to:</p> <p>The Council will improve the strategic corridor to provide an attractive open space with improvements to the biodiversity. Developments in and adjacent to the River Crane Corridor will be expected to contribute to improving the environment and acc in line with planning guidance</p>

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
65	Paragraph 9.2.6.8	6.22	<p>Targets and Monitoring Replace with: LDF Indicator Progress on the development of the four sites (Richmond College, Central Depot, Post Office Sorting Office, and Harlequins) in accordance with SPG and assessment of financial and wider benefits to the River Crane Corridor. Target Annual progress to be made, no specific target Family New AMR</p>
66	Paragraph 9.3.1.12	7.3	<p>Targets and Monitoring Replace with: - LDF Indicator Progress on Public transport improvements in Areas of Relative Disadvantage Target N/a Family New AMR</p> <p>LDF Indicator Number of claimants of unemployment benefits in 5 areas of relative disadvantage Target No target as numbers too small to be statistically significant Family CP, New AMR</p> <p>LDF Indicator Specific new community facilities provided within 5 Areas of Relative Disadvantage Target Facilities to be provided as required, no specific target Family New AMR</p> <p>LDF Indicator Progress with implementation of improvement schemes in the 5 areas of relative disadvantage Target At least 1 scheme implemented per annum Family New AMR</p>
67, J-70, J-71, J-73	Policy 14.C	7.32,7.33	<p>Change to:</p> <p>14.C Residential proposals will be assessed for the contribution to meeting housing need for all sections of the community. The London wide Gypsy and Traveller Accommodation Assessment has identified a need for a further 2-11 pitches' in the Borough. The shortage and cost of land mean that there will be limited opportunities for gypsy and traveller accommodation in addition to the existing site which will be protected. The Borough will work with partners, RSLs, developers and neighbouring Authorities to seek to meet identified need. Sites will be allocated as part of the Site Allocations Development Plan Document.</p> <p>Sites for temporary or permanent use should meet the following criteria:</p> <p>1. The site can provide for a satisfactory arrangement of pitches, permanent buildings and open space;</p>

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			<p>2 The use of the site would have no significant adverse effect on the amenity of occupiers of adjoining land;</p> <p>3. The use of the site would be acceptable in terms of the visual amenity; and</p> <p>4. The use could be supported by adequate social infrastructure in the locality.</p>
68	Policy CP14.D	7.19,7.20	<p>Add new Policy CP14.D as follows:</p> <p>The density of residential proposals should take into account the need to achieve the maximum intensity of use compatible with local context, while respecting the quality, character and amenity of established neighbourhoods and environmental and ecological policies. The London Plan Density Matrix and other policies will be taken into account to assess the density of proposals.</p> <p>Policy CP14.D becomes 14.E.</p>
71, J-78,J-79	Paragraph 9.3.2.18	7.34	<p>Targets and Monitoring Replace with: -</p> <p>LDF Indicator Net additional dwellings completed for the reporting year. Target At least 270 net additional residential units per year Family DCLG COI H2c, AMR, NI 154, GLA KPI 4, AC QOL 36, RTP1 SPOI 1.2</p> <p>LDF Indicator Percentage of all new/converted housing to be built on previously developed land (as a percentage of all new and converted dwellings). Target 95% of all new/converted housing to be built on previously developed land (as a percentage of all new and converted dwellings). Family AMR, DCLG COI H3, GLA KPI 1, SA Note that this indicator is repeated in CP1</p> <p>LDF Indicator Proportion of small units* as percentage of all private housing completions *as defined by CP 14.E Target At least 25% small units as percentage of all private housing completions Family AMR</p> <p>LDF Indicator Percentage of new housing built to wheelchair standards Target 10% of new housing built to wheelchair standards on developments Family AMR</p> <p>LDF Indicator Percentage of new dwellings (gross) completed in each of the 3 net density ranges (>35, 35-50 & 50+ dw/ha) as a percentage of total dwellings (gross) completed per annum. Definition of net density is set out in PPS 3.</p>

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			<p>Target Less than 35 dwellings per hectare – no more than 10% of gross units completed From 35-50 dwellings pre hectare – at least 10% of gross units completed Over 50 dwellings per hectare – at least 80% of gross units completed Family AMR, SA Note that this indicator is repeated in CP14</p> <p>LDF Indicator Average density of residential developments in Richmond and district centres as defined by town centre boundaries Target At least 80% of residential developments within Richmond and Twickenham town centres(as defined by town centre boundaries)to be above 70 units per hectare Family AMR, SA</p>
J-81	Policy CP15.B & Paragraph 9.3.3.7	7.28	<p>Delete the following from Policy CP15.B:</p> <p>iii. On sites where 100% affordable housing is being provided consideration will be given to reducing or removing planning obligations.</p> <p>Change paragraph 9.3.3.7 to:</p> <p>9.3.3.7 Where viability is an issue in providing affordable housing, the onus will be on developers to produce a financial assessment showing the maximum amount that could be achieved on the site. On sites where 100% affordable housing is being provided the Council will consider reducing or removing planning obligations if justified through a financial appraisal model or other evidence, Further information will be available on this position in the Affordable Housing Supplementary Planning Document. The GLA's Three Dragons or a similar model should be used in presenting the viability of a scheme. The 8.2 Costs and Viability section of this report gives further details of what will be expected.</p>
72	Paragraph 9.3.3.10	7.34	<p>Targets and Monitoring Replace with: - LDF Indicator Percentage of all new housing completions (gross) which is permanent affordable housing Target At least 50% of all residential completions (gross) to be affordable housing over plan period Family DCLG COI H5, AMR, GLA KPI 5, AC QOL 37, CP, NI 155</p> <p>LDF Indicator Number of households living in temporary accommodation Target To reduce the number of households living in temporary accommodation by 50% (based on 2006 figures) by 2010.</p> <p>Family NI 156, New AMR</p>
	Paragraph 9.3.2.6	7.14	<p>Re-word the first sentence as follows: On the basis of current large site commitments and the</p>

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			assumptions made in the London Housing Capacity Study about small sites coming forward, the phasing of development is anticipated to be 1714-1834 units in the five years 2009-2013 and 1012 units during the five years 2014-2019.
74	Paragraph 9.3.4.11	7.38	<p>Targets and Monitoring Replace with: - LDF Indicator Number of Planning Obligations achieved and money raised for infrastructure projects. Target No target appropriate as obligations should be related to development where necessary Family AMR</p> <p>LDF Indicator Net amount of completed floorspace in community uses lost to other uses. Target No net loss of floorspace in community facilities Family AMR</p> <p>LDF Indicator Progress on implementation of site specific actions in Metropolitan Police Asset Management Plan – Richmond upon Thames 2007, or subsequent updates. Target No specific target, progress to be made at each 3 year review. Family New AMR</p>
75, J-84, J-85	Policy CP17	7.38	<p>Change to:</p> <p>17.A Health and well-being in the Borough is important and all new development should encourage and promote healthier communities and places.</p> <p>17.B The provision of new or improved facilities for health and social care and other facilities will be supported. Such facilities should be in sustainable locations and accessible to all and priority will be given to those in areas of relative deprivation which are identified in Core Policy 13, an immediate need for primary health care facilities (especially doctor's surgeries) has been identified in Kew, Richmond, Whitton and Ham. Sites for larger facilities may be identified in the Site Allocations DPD.</p> <p>17.C A pattern of land use and facilities will be promoted to encourage walking, cycling, and leisure and recreation and play facilities to provide for a healthy lifestyle for all, including provisions for open and play space within new development as appropriate.</p> <p>17.D Existing health, social care, leisure and recreation provision will be retained (J-84) where these continue to meet or can be adapted to meet residents' needs. Land will be safeguarded (J-85) for such uses where available, and maximise the potential of re-using or redeveloping existing sites.</p>
77	Paragraph 9.3.5.18	7.38	<p>Targets and Monitoring Replace with: - LDF Indicator Number of Planning Obligations achieved and money raised</p>

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			<p>for health facilities</p> <p>Target No target appropriate as obligations should be related to development where necessary</p> <p>Family AMR</p> <p>LDF Indicator Amount of completed floorspace in clinic/health centre use</p> <p>Target No net loss in floorspace in clinic/health centre use</p> <p>Family AMR</p> <p>LDF Indicator Progress on implementation of site specific proposals in Richmond and Twickenham NHS Primary Care Trust (PCT): Estates Strategy and Strategic Development Plan (August 2005 or subsequent updates)</p> <p>Target No specific target, progress to be made at each review.</p> <p>Family New AMR</p> <p>LDF Indicator Overall/general satisfaction with local area (Place Survey)</p> <p>Target Good performance typified by a higher percentage but target not yet known (not previously measured)</p> <p>Family NI 5, LSDC QOL 10, RTP1 SPO1 3.2, New AMR</p>
78	Policy CP18	7.38	<p>Change 18.C to:</p> <p>The Council will ensure that the provision of schools, pre-schools and other education and training facilities are sufficient in quantity and quality to meet the needs of residents. Demand for primary places is currently particularly high in Richmond/East Sheen, St Margaret's/East Twickenham and Teddington.</p>
79	Policy CP.18	7.38	<p>Insert new 18.B as follows:</p> <p>18.B Land in educational use will be safeguarded and new sites may be identified in the Site Allocations DPD. The potential of existing educational sites will be maximised through redevelopment, refurbishment or re-use to meet educational needs. <i>Re-number 18.B and 18.C to 18.C and 18.D respectively.</i></p>
80	Paragraph 9.3.6.20	7.38	<p>Targets and Monitoring Replace with: -</p> <p>LDF Indicator Level of Planning Obligations achieved for Education</p> <p>Target No target appropriate as obligations should be related to development where necessary</p> <p>Family New AMR</p> <p>LDF Indicator Progress in meeting site specific elements of the Richmond upon Thames Strategic Plan for Children's Centres and Extended Schools and the Richmond upon Thames Education Development Plan</p> <p>Target</p>

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
			Progress to be measured on an annual basis, no target proposed Family New AMR

Change No.	CS Policy or paragraph No.	Report paragraph	Recommended Changes
J-86 to J-90	Policy CP19	7.43	Change to: 19.A A diverse and strong local economy will be supported by: 19.B Retaining land in employment uses for business, industrial or storage. 19.C Requiring development likely to generate significant amounts of travel to be located in areas highly accessible to public transport, with the largest office developments located in Richmond and Twickenham town centres. 19.D Encouraging the provision of small units. 19.E Requiring mixed use schemes to retain the level of existing employment floorspace. However the inclusion of residential use within mixed used schemes will not be appropriate where it would be incompatible with established employment uses on neighbouring sites and prejudicial to their continued operation. 19.F Encouraging major new development to take account of requirements set out in the Planning Obligations Strategy (or any revision) in relation to training and enterprise.
81, J-91	Paragraph 9.3.7.8	7.43	Targets and Monitoring Replace with:- LDF Indicator Amount and type of completed employment floorspace developed by employment type Target n/a Family AMR, DCLG COI BD1 LDF Indicator Percentage of new employment floorspace located within Richmond and the district centre boundaries Target At least 75% of new employment floorspace to be located within Richmond town centre and the district centre boundaries Family AMR, DCLG COI BD 4 (in part) LDF Indicator Amount of employment floorspace lost to completed non-employment uses Target Loss of employment floor space not to exceed 500m2 per annum Family

			<p>AMR, SA</p> <p>LDF Indicator Number of workers in the borough (employees in employment) Target Maintain total numbers of employees in employment at previous year's level. Family AMR, RTPI SPOI 2.1 (percentage change), NI 151 (rate)</p> <p>LDF Indicator Number of firms per annum registering for VAT Target Net increase of 150 firms per annum registering for VAT Family AMR, SA, CP. Similar to NI 171 & AC QOL 13 (a) (not net increase), RTPI SPOI 2.2 (percentage change).</p> <p>LDF Indicator Percentage of small business in an area showing employment growth Target Good performance typified by a higher percentage but target not yet devised as not previously measured Family NI 172, New AMR</p> <p>LDF Indicator Skills gaps in the current workforce reported by employers Target Target to be devised when time series data are available Family NI 174, New AMR</p> <p>LDF Indicator Completed small business units under 250 sqm Target 75% of all employment floorspace completions to be below 250sqm Family New AMR(J-91)</p>
82	Paragraph 9.3.8.7	7.43	<p>Targets and Monitoring Replace with: -</p> <p>LDF Indicator Number of tourism-related jobs(employees in employment) Target Maintain level of employees in employment in the borough in tourism-related jobs close to 12%. Family New AMR</p> <p>LDF Indicator Number of visitors to major attractions in the borough per annum. Target All 4 to have over 70,000 visitors per annum or all 4 to be in top 10 attractions in London Family New AMR</p> <p>LDF Indicator Number of hotel bed spaces completed per annum Target Minimum 100 bed spaces after 5 years (2014), target to be reviewed thereafter Family New AMR</p>

*Policy CP8.C

Town Centre	Richmond Town Centre	Twickenham, Teddington, Whitton, and East Sheen	Local & neighbourhood centres
Objective	Maintain and reinforce the centre as the location for major offices, retail (particularly comparison goods and specialist retail) and service uses, arts, culture, and leisure and tourism facilities Make use of potential for tall buildings in station area	Maintain and reinforce the centres' retail role (both for convenience and comparison goods to meet weekly shopping requirements) and maintain the level of service uses; encourage other uses of a scale appropriate to district centres Twickenham only - Make use of potential for tall buildings in station area	Strengthen neighbourhood and local centres by encouraging a range of shops, services and other uses consistent with meeting people's day to day needs. Encourage other uses of a scale appropriate to the centre
Business and employment	Suitable for major office development net increase in jobs to 2021 - 3,000	Twickenham: suitable for major office development (See CP09) net increase in jobs to 2021- 2,500 Others: Maintaining level of offices but not significant expansion; net increase in jobs to 2021 Teddington - (includes Hampton) - 1,600 East Sheen - 100 Whitton - 50	Maintain premises for small businesses.
The night time economy	Maintain—rather than expand—capacity of drinking establishments and night clubs	All: Limit drinking establishments and night clubs to a scale compatible to local need Twickenham: Provide range of evening activity to promote a more diverse evening economy attractive to all age groups	Limit drinking establishments and night clubs to a scale compatible to local need.
Car parking	Not provide for an expansion of car parking but manage to maintain vitality and viability of the centre;	Twickenham & Teddington: not provide for an expansion of car parking but manage in order to maintain vitality and viability of the centre; East Sheen & Whitton Additional parking may be considered as part of retail schemes	Not provide additional car parking but manage in order to maintain vitality and viability of the centre
Public transport	Improve public transport and particularly Richmond	Improve public transport and particularly	Improve public transport where necessary

Town Centre	Richmond Town Centre	Twickenham, Teddington, Whitton, and East Sheen	Local & neighbourhood centres
	Station interchange facilities, the bus station and bus stops	Twickenham and Mortlake Station and bus stops.	
Residential	Encourage Higher density, including affordable and small units; and car free development.	Encourage Higher density, including affordable and small units; and, particularly in Twickenham, car free development	Encourage Density suitable for its site including small units.
Retail development	Encourage larger retail development not to adversely impact on the vitality and viability of established shopping areas within the centre or any other existing centre. Indicative increase in retail floorspace to 2017: - 8,000 sq m net	Maintain and reinforce retailing, which should be. concentrated around the main shopping area, and should be of an appropriate scale not to adversely impact on the vitality and viability of established shopping areas within the centre or any other existing centre. Indicative increase in retail floorspace to 2017: Twickenham - 400 sq m net Teddington - 300 sq m net East Sheen – 1,500 sq m net Whitton - 600 sq m net	Local shops to be located within, or well-related to designated shopping frontages and be appropriate for the size and function of the centre in order not to have an adverse effect within the centre or on other neighbouring centres
Visitor and Tourism facilities	Support Provision for visitors including hotels.	Twickenham: support provision for visitors including hotels. Others: Small scale provision may be appropriate	Small scale provision may be appropriate
Leisure, arts and culture	Encourage strategic provision	Encourage provision appropriate to role & function of the centre	Encourage local facilities.