

LONDON BOROUGH OF RICHMOND UPON THAMES
LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC
WRITTEN STATEMENT

HEARING 4: SITE ALLOCATIONS (PART); SA 1 - 16

THURSDAY 28 SEPTEMBER, MORNING

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1. Are the Site Allocations justified by the evidence base and of sufficient detail so as to be effective in delivery? Are heritage assets referenced adequately?

In relation to whether the Site Allocations are justified by the evidence base, it should be noted that the Council commenced work on a Site Allocations Plan towards the end of 2012. Various rounds of public consultation were carried out as part of the development of this Plan before it was agreed by Cabinet at its meeting in July 2015 that the site specific allocations would be taken forward alongside the review of the existing policies rather than as a separate DPD. At that stage it was made clear that all the work undertaken to prepare the Site Allocations Plan was used as a basis for considering the allocations in the review of the Local Plan. This was specifically set out at paragraphs 1.2.1-1.3.2 of the consultation on the Scope and Rationale for Review of Planning Policies together with the emerging Site Allocations (Jan/Feb 2016) (PS-005).

It is therefore clear that the then existing draft Site Allocations Plan, which had been fully informed by and subject to Sustainability Appraisal (SA), was used as a basis for reviewing the Local Plan and for consultation purposes. In particular, the 2013 Sustainability Appraisal of the Pre-Publication Site Allocations Plan (PS-013, PS-014, PS-015) assessed and compared reasonable and realistic alternatives for the sites in order to derive at 'the most appropriate strategy' for the relevant sites. The Sustainability Appraisal Progress Report (PS-011) of September 2013 specifically focused on Stage B in terms of developing and refining the options and alternatives for the various sites and proposals, which are set out in detail in Appendix 4 of this SA Progress Report.

Appendix 1 of this Statement sets out the options and reasonable alternatives considered for the Site Allocations to be discussed within Hearing 4. This also includes how the SA has informed the Plan and the relevant Site Allocations.

The preparation of the Site Allocations Plan and the Local Plan has continued to assess the latest evidence and research on local needs so that the Site Allocations play an important role in addressing needs, particularly for social infrastructure needs, and identifying land to contribute to employment, retail and housing needs.

In relation to whether the Site Allocations are of sufficient detail so as to be effective in delivery, the following should be noted. Due to the nature of Richmond borough, which is characterised by large swathes of protected parks and open spaces with the remaining areas being relatively dense low-medium rise towns and villages, the capacity for significant development and increases in housing supply and commercial development is generally very limited. With the exception of very few larger/large sites, which are being taken forward

as Site Allocations within this Plan, the majority of developments take place on smaller brownfield sites (also see the Council's Statement for Hearing 3 on Housing, which sets out the significant reliance on small sites). In addition, the very few larger/large sites are all brownfield sites, which require a site-specific approach to redevelopment. On the majority of the Site Allocations, the Council is already in discussion with the landowners, and it would be considered inappropriate to be more prescriptive within the Site Allocations, such as setting out a range of residential units or commercial floorspace to be delivered, as these discussions need to take place with the relevant landowners on a site-by-site basis, informed by discussions such as on site specific circumstances, local needs and viability, to ensure flexibility and effective delivery. Some of the sites represent longer-term opportunities, for key sites due to their siting or size, where the Plan seeks to influence development should they come forward through planning, and it would be unrealistic to specify content at this early stage. To demonstrate that all the Site Allocations are effective in delivery, a more detailed analysis of the 28 Site Allocations is set out in Appendix 2 to this Statement.

Are heritage assets referenced adequately?

The Council has agreed a Statement of Common Ground (SOCG) with Historic England (LBR-LP-008). Some minor changes and modifications are proposed to various site allocations to address Historic England's comments on heritage assets. Therefore, taking into account the proposed minor modifications, the Council can confirm that the heritage assets are adequately referenced in the Plan.

2. SA 2 – does the allocation recognise the heritage assets potentially affected?

The Council and Historic England have produced jointly a SOCG, and a minor change is proposed by the Council to address Historic England’s representations as follows “**Of the five listed buildings on Platts Eyot, four are on the Heritage at Risk Register, as well as the conservation area covering the island. There is a need to ensure that these designated heritage assets, and the wider character of the island, are improved and enhanced.**” This change is supported by Historic England and therefore SA 2, with the proposed minor change, adequately recognises the heritage assets.

The SOCG sets out why the Council does not consider it necessary to include cross-references to policy LP 7, as the assumption is that all policies set out in the Plan and other adopted guidance applies, and because the Archaeological Priority Areas (APAs) are currently under review and could change prior to the adoption of the Plan.

How does the allocation reconcile flood risk?

The supporting text (bullet point 6) recognises the issue of the provision of safe access and egress to and from the island. The Environment Agency (EA) did not provide any specific comments on SA 2. It should be noted that the Council has previously agreed with the EA the Council’s Flood Risk Sequential Test report (SD-042). This report acknowledges that despite the site being located within an area of high probability of flooding, the Sequential Test is passed because the site allocation relates largely to the regeneration of the existing historic and industrial uses, and residential development would be limited to the minimum necessary to achieve the regeneration of the island overall, thus providing wider sustainability benefits to the community. In line with policy LP 21 of the Plan, a site-specific FRA will be required, and safe access/egress to and from the site will be a key consideration as part of any future development proposal. It is therefore considered that the flood risk issue and particular safe access/egress can be dealt with at planning application stage and that it would not hinder or prevent this site from coming forward for development. It is also noted that the landowner (Representor ID 222, see page 208 of LBR-LP-002) is supportive of SA 2.

3. Is SA 3 justified by the evidence base and should it recognise the planning permission resolved to be granted by the Council?

Yes. The allocation of Hampton Traffic Unit is justified by the evidence base and has been subject to Sustainability Appraisal (see Appendix 1). There is a general need for employment, employment generating and other commercial as well as social infrastructure facilities in the borough and in this area. This is because there are generally limited development sites in the borough and due to the high residential land values, it is important to fully explore the provision of non-residential uses on sites that have existing non-residential uses prior to consideration of residential uses, in line with the relevant policies set out in the Plan. The site allocation does therefore not preclude the provision of residential development per se; however, relevant policies as set out in the Local Plan need to be addressed first.

It is recognised that [16/0606/FUL](#) was approved by the Council's Planning Committee on 5 April 2017, subject to completion of a S106 agreement, for 28 residential units, after due consideration of the relevant policies. A legal agreement to provide environmental and highway improvements and an exemption from parking permit eligibility and a review of affordable housing viability has been signed and permission granted on 5 September 2017. There are pre-commencement conditions to be discharged prior to any development.

Development has not yet commenced on this site, although there is a reasonable prospect of delivery by the landowner. Although permission has been granted, the Council cannot guarantee implementation of this particular scheme. It would therefore be considered too premature to amend or remove this site allocation from the Plan at this time. However, for clarification purposes, a minor change is proposed as follows at the end of bullet point 3 of the site allocation: "The site was declared surplus to requirements by the Metropolitan Police in 2015. **It is recognised that a planning application for 28 residential units has been granted permission.**"

4. Are the provisions of SA 7 sufficiently clear and justified? Should the allocation include specific reference to the provision of appropriate outside space and parking provision?

Yes. The Council considers SA 7 to be sufficiently clear and justified by the evidence base and has been subject to Sustainability Appraisal (see Appendix 1).

. This is an existing social infrastructure site and the policy requires compliance with social infrastructure policies prior to consideration of residential uses.

This is a Council owned site and liaison and co-operation with the current child-care provider is ongoing to explore the options for the site. The current intention is to re-provide a nursery as part of the wider development of this site, and negotiations in this regard are underway.

The policy is sufficiently clear and provides flexibility. It states that if the current child-care provision can be adequately re-provided in a different way (e.g. by making more efficient use of land) or elsewhere, and if other alternative social infrastructure uses have been discounted, then the policy supports the provision of an affordable housing scheme. The policy would also support a mixed use scheme (i.e. social infrastructure, such as child-care provision, and affordable housing).

With regard to the provision of outside space and parking, a minor change is proposed in relation to bullet point 5 as follows: "Proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way, **including the provision of appropriate outside space and parking related to the child-care services,** or elsewhere in a convenient alternative location accessible to the current community it supports."

5. SA 8 – is the site allocation, particularly in relation to the extent of MoL, justified and consistent with the London Plan?

Yes, the Council considers SA 8 to be in general conformity and consistent with the London Plan; it is also justified by the evidence base and has been subject to Sustainability Appraisal (see Appendix 1).

The supporting text of SA 8 recognises that St Mary's University is a constrained site (bullet point 4), particularly due to the majority of land not built on being designated as MOL. Both the London Plan and the Council's Local Plan set out strong policies on the protection of Metropolitan Open Land (MOL), i.e. London Plan policy 7.17 and LP 13 of the Local Plan. LP 13 is in general conformity with London Plan policy 7.17, and it is clear that these policies seek to protect designated MOL from 'inappropriate development', and that such development in MOL should be refused except in 'very special circumstances'.

The purpose of SA 8 is to allow for the improvement and upgrading of existing facilities and new additional educational / teaching and other associated facilities as well as student residential accommodation to ensure the University remains a competitive and viable higher education facility in the future.

The Statement of Common Ground (SOCG) with the Mayor of London (LBR-LP-009) confirms that both parties support growth and new development by maximising opportunities on land not designated as MOL, whilst recognising that there may be some impact on MOL due to the constrained nature of the site. Both parties consider that there is considerable scope to increase densities and efficiencies in land not within designated MOL, through for example optimising the use of existing buildings and already built-up land / areas on the site.

Any proposals for development coming forward on this site will be considered against all policies set out in the 'development plan' for the borough, including those relating to MOL. If there were a proposal for 'inappropriate development' in MOL, this would need to demonstrate that 'very special circumstances' would outweigh the potential harm to MOL.

The SOCG sets out some changes and modifications that have been agreed with the Mayor of London. Whilst there remains a minor point of disagreement, the Council considers that overall, the proposed changes ensure that this Site Allocation is in 'general conformity' with the London Plan.

Note that a minor change is proposed to bullet point 5 of the supporting text, as set out in the SOCG with Historic England: "Any development proposal has to **take account of the highly significant heritage assets** and respect the special and unique location and setting of St

Mary's University, **including the Grade I listed Chapel**, the adjoining Grade I Listed Building (Strawberry Hill House) and the associated Historic Park and Garden **(II*)** as well as the high quality Edwardian villas within the Waldegrave Park Conservation Area.”

6. SA 11 – is the allocation justified adequately and should it reference clearly the approach to growth of facilities at the site?

Yes. The Site Allocation for Twickenham Stadium is fully justified (it has been subject to Sustainability Appraisal, see Appendix 1) and it is noted that the landowner (Representor ID 247, see page 219 of LBR-LP-002) overall supports the policy.

The Council considers that the current policy wording allows for some growth on the site, i.e. appropriate additional facilities, including a new east and north stand, indoor leisure, hotel or business uses, as well as hospitality and conference facilities. SA 11 also sets out that the Council will require any proposals and additional uses to be complementary to the main use of the site as a sports ground. The supporting text clarifies that the Council would also consider a mixed use scheme appropriate, which may include residential, provided that other sporting and associated uses have been explored first.

The policy seeks to address improvements and growth in relation to physical structures and new built development or redevelopment of existing facilities for sports uses, and/or uses that are complementary to it. It is acknowledged that the site allocation does not specifically deal with growth in terms of the diversity in the operation of the stadium (e.g. for non-sporting purposes such as for concerts, events and other leisure uses).

Whilst use of the Stadium for non-sporting events also requires planning permission, such use can lead to significant local impacts that need to be fully considered and which may necessitate mitigation measures. Whilst the Council has generally supported such applications in the past, such proposals will need to be fully assessed and considered against other Local Plan policies (e.g. in relation to highway, residential amenity impacts etc.) as well as other regulations and licenses. It is therefore considered to be inappropriate for the Site Allocation to specifically support growth in the stadium for multiple purposes and non-sporting events.

A minor change is proposed in relation to bullet point 4 (last sentence), as follows, to address the comments received by the landowner: “A mixed use scheme, **with which may include** residential including affordable housing, may also be considered appropriate provided that other sporting and associated uses, including employment, have been fully investigated and that the mixed / residential use is compatible with the main use of the site, i.e. a national stadium, also taking into account the presence of the existing sewerage treatment works to the north of the site and residential amenity.”

7. SA 14 – is the allocation justified and up to date? Is it sufficiently flexible to be effective in delivery?

The Council considers that Policy SA 14 is justified (also see Appendix 1) and reflects the current position with regard to the Ministry of Defence's Footprint Strategy (PS-064), in which the site has a forecasted vacation date of 2020. The Defence Infrastructure Organisation (DIO), Representor ID 59 (see page 100 of LBR-LP-002), overall supports the site allocation, and the Council is aware that the DIO has commissioned an Assessment Study to look at options for re-provision of the Royal Military School of Music.

The Council is liaising and co-operating with the DIO over its future aspirations for the site. Both parties have agreed to progress a Masterplan, Planning and Development Brief (SPD) for the site in consultation with the local community. Policy SA 14 provides the strategic planning context for the detailed Masterplan work, and it identifies appropriate land uses for the site as residential, employment, and social infrastructure uses, such as health and community facilities. Kneller Hall itself is Grade 2 listed. It provides a cultural and historic legacy for the surrounding area and presents a unique opportunity for regeneration with benefits for the local community.

The Council considers the policy to be sufficiently flexible to allow the range of uses that may be appropriate for this site to be fully considered and explored as part of the development of the Masterplan (SPD), in consultation with the local community. Therefore, SA 14 is considered to be deliverable as it incorporates a degree of flexibility by providing for a mix of uses whilst allowing the forthcoming detailed Masterplan work to identify and refine the details. The supporting text also sets out that residential is an appropriate land use and recognises that this will assist with the site's delivery, whilst at the same time retaining an emphasis on community and employment/employment generating uses to deliver benefits for the local area. There is also wider flexibility for the type of potential employment use included in the policy with reference to employment generating uses rather than the policy specifically referring to B1, B2 or B8 uses. SA 14 is therefore sufficiently clear as well as detailed and flexible in relation to the nature and scale of development.

The Council is committed to developing a Masterplan (SPD) in conjunction with the DIO, which will guide and set out appropriate land uses as well as the appropriate scale, form and design of development. It should be noted that in August 2017 an Expression of Interest has been submitted to the Local Government Association for One Public Estate (OPE) funding for the development of a Masterplan (SPD). The DIO has been privy to the bid for OPE funding and supports this approach.

Are heritage assets referenced appropriately?

Yes, see the SOCG with Historic England (LBR-LP-008). Whilst the Council considers that bullet point 7 of the supporting text appropriately references the heritage assets including their significance, a minor change is proposed as follows: “Any development should **be sensitive to the significance of the historic building and** respond positively to the setting of the Listed Building.” This has been agreed by Historic England.

See the SOCG with Historic England as to why the Council does not consider it necessary to include cross-references to policy LP 7, as the assumption is that all policies set out in the Plan and other adopted guidance applies, and because the Archaeological Priority Areas (APAs) are currently under review and could change prior to the adoption of the Plan.

8. SA 15 – is the allocation justified by the evidence base with due regard to reasonable alternatives? Should the allocation be more flexibly worded to accommodate the potential for residential provision?

Yes, the allocation is justified by the evidence base and has been subject to Sustainability Appraisal (see Appendix 1).

Ham Close is a very unique site by being the only larger scale housing estate within Richmond borough. Richmond Housing Partnership (RHP) is the freeholder of the 192 flats at Ham Close and together with the Council they own much of the land in the area. The flats are of poor construction, with poor insulation by today's standards; many have condensation/damp issues and there are no lifts.

In 2013, The Prince's Foundation for Building Communities, was invited by the Council and RHP to work with residents, businesses and local organisations to consider the future of Ham Close. During December 2013 and January 2014, the Council, RHP, and The Prince's Foundation carried out a public consultation and produced a report which highlighted the principles on which any future vision for the area should be based. Following the Government change in 2015 on the funding and operation of social housing providers, the Council and RHP carried out a high level viability appraisal and a public consultation on two options, i.e. total redevelopment or retaining the status quo. There were some strong messages from this consultation: not to relocate the library to the Close, not to build on or relocate the green and more generally that there should be more engagement with the community to shape any proposal for development. Throughout the summer of 2016, a series of design workshops was held to provide residents the opportunity to give feedback to the Council and RHP on the best possible design solutions for redevelopment. This was followed by a further consultation in the autumn of 2016 on a revised redevelopment scheme, this consultation was successful in gaining the support of the community and estates' residents and further to this RHP Board and LBRuT Cabinet committed to progressing to the next stage of the project.

The Council and RHP are now in the process of preparing detailed designs and studies to inform the submission of a planning application by summer 2018. Financial viability as well as past feedback from the local community are key considerations in developing the final scheme. The current masterplan as consulted on in the autumn 2016 delivers a significant number of additional residential units (approximately 200+ net).

To conclude, the Council has been working in close co-operation with RHP for several years to consider realistic and achievable options for redevelopment that would support the

regeneration of the housing estate and rejuvenate the site as well as its surrounding area. Key to identifying, developing and refining options has always been the need to strike an appropriate balance between achieving financial viability and maximising land for development whilst at the same time respecting the local character and its surrounding area. The policy supports the demolition of existing buildings to allow more effective use of land and re-provision for all existing residential buildings as well as provision of additional new residential accommodation. It is therefore considered that the policy is worded sufficiently flexibly to accommodate a significant increase in residential provision. It should also be noted that the Ham Close project has received both Government and GLA funding / grants for the regeneration of the site, for which a pre-requisite is a certain level of commitment both in terms of delivery of the redevelopment as well as provision in additional residential units.

9. SA 17¹ – is the allocation justified by the evidence base, particularly in relation to the identified land uses and the garden designation as OOLTI (Other Open Land of Townscape Importance) and OSNI (Other Site of Nature Importance)? Will the allocation be capable of effective implementation?

Yes, the Site Allocation for St Michael's Convent is justified by the evidence base and has been subject to Sustainability Appraisal (see Appendix 1).

The site has been declared surplus to requirements and due to the existing land use, the Council considers that social and community infrastructure uses are the most appropriate land uses. In addition, the policy recognises the need to protect and restore the Listed Buildings and that therefore residential uses could be considered.

It is acknowledged that the landowners, Beechcroft Developments Ltd (Representor ID 26), do not consider that the site should be treated as a social infrastructure use. Whilst the Council has stated on numerous occasions (as part of the Local Plan process as well as during pre-application and application discussions) that this site is to be treated as social infrastructure use, the policy acknowledges that conversion or potential redevelopment for residential uses could be considered provided that this supports the protection and restoration of the Listed Buildings. The policy is justified by the evidence base as there is a general need for social infrastructure facilities in the borough and in this area, as set out within the Council's Infrastructure Delivery Plan (SD-021A). Therefore, the policy is considered to be sufficiently flexible to allow for viability considerations and the provision of residential uses whilst also complying with Local Plan policies relating to social infrastructure. It will be for the applicant/developer to demonstrate that there are no other viable social infrastructure / community uses as part of the planning application process.

There are two current planning applications as well as an application for listed building consent under consideration (see [16/3552/FUL](#) and [16/3554/FUL](#) as well as [16/3553/LBC](#)). The applicant has already considered some alternative social infrastructure uses for the site, and the Council has set out its expectation that there will be a proportion of community space within the site, alongside the proposed retirement accommodation. It should be noted that the application now proposes the inclusion of meeting rooms, which are proposed for community use; should the application be recommended for approval, it is expected that a Community Use Agreement would be secured by S106.

¹ This question originally referred to SA16 in error. A discussion upon SA16 may be held at the Inspector's discretion following submission of additional statements.

It is also worth noting that only 16/3554/FUL proposes development in the gardens, which the Local Plan seeks to designate as OOLTI and OSNI, proposed under 16/3554/FUL. There is therefore a willing landowner who is pursuing planning applications for this site, which demonstrates that this allocation is capable of being delivered.

Policy LP 14 (OOLTI) sets out the criteria for OOLTI designation, which have been fully examined and accepted by the Inspector as part of his Report into the Examination in Public of the Development Management Plan in 2011 (PS-079). Whilst the OOLTI designation has been assessed as positively within the Sustainability Appraisal, the test as to whether an OOLTI designation should apply to a site is by considering each criterion set out in paragraph 5.3.4 in turn. See Appendix 3 to this Statement for a detailed assessment against each OOLTI criterion. It should be noted that Policy LP 14 can also apply to other open or natural areas that are not designated within the Proposals Map, but which would meet the criteria for designation (see paragraph 5.3.5). As can be seen from the Regulation 19 responses, there is substantive community and local resident support for the designation of the gardens as OOLTI.

Policy LP 15 states that the borough's biodiversity will be protected and enhanced. This relates to both designated (such as OSNI) as well as non-designated sites within the borough. See Appendix 4 to this Statement for the detailed evidence base and justification for the OSNI designation. As can be seen from the Regulation 19 responses, there is substantive community and local resident support for the designation of the gardens as OSNI.

Appendix 1 – Sustainability Appraisal (SA): options and reasonable alternatives considered, including how the SA informed the Site Allocations

As set out within the SA Scoping Report for the Site Allocations Plan (PS-010), the SA objectives have been supplemented with a detailed SA Assessment Framework and Decision Making Criteria (section 5.3). This was subsequently used to assess the options and reasonable alternatives for each site, a summary of which is set out in the table below. The SA Progress Reports that supported the Site Allocations Plan (PS-011, PS-013 and PS-015) specifically focused on developing and refining the options and alternatives for the various sites and proposals.

When the Council commenced the review of the existing Local Plan, the SA of the Pre-Publication Local Plan (PS-008) made it clear that the appraisal of options and alternatives for the Site Allocations was considered and carried out as part of the work on the Site Allocations Plan (see above). The options and alternatives, including reasons for rejecting alternatives remain relevant.

The following table provides a summary of the options and reasonable alternatives considered, and how the SA has informed the various Site Allocations (*this is in order of the Inspector's questions within this Statement*):

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
SA 2 Platts Eyot, Hampton	<p>Option A: Retain status quo</p> <p>Option B: Refurbish and redevelop existing buildings on the island to provide river-dependent and river-related uses, including boatyards, industry and manufacturing as well as café and leisure uses and enabling small-scale residential.</p> <p>Option C: Residential development on the whole island</p>	<p>Option A is considered to have significant negative impacts on heritage and conservation due to the entries in the Heritage at Risk Register. Retaining the status quo is unlikely to reverse the decline of river-related and other industries.</p> <p>Option B has positive and negative impacts. Flooding would need to be addressed due to access/egress arrangements. Intensification of uses on the island would lead to more traffic and parking on the mainland. Would need to ensure no harmful impacts on biodiversity and open space designations, and sensitive redevelopment to take account of character and heritage at risk. Would benefit the local economy.</p> <p>Option C has identified a large number of negative impacts, which cannot be mitigated.</p>	<p>Following the assessment of options, Option B has been further refined as follows: Regeneration of the island by maintaining, and where possible enhancing, existing river-dependent and river related uses. New businesses and industrial uses (B1, B2 and B8) that respect and contribute to the island's special and unique character are encouraged. Residential development to allow for the restoration of the Listed Buildings, especially those on the Heritage at Risk Register, may be appropriate.</p> <p>This option is considered the most sustainable as it would retain river-related uses and light industry, with only very small scale residential development. It would also preserve the setting of historic buildings, and complement the existing character and Conservation Area of the island.</p>	<p>The preferred option is overall considered the most sustainable, but it is acknowledged that it has both positive and negative impacts. Potential negative impacts relate to flooding due to the island not having safe access/egress, but this can be mitigated through a site-specific Flood Risk Assessment, Flood Emergency Plan and working with the Environment Agency. Intensification of uses could result in more traffic and parking issues on the mainland, but this could be mitigated through encouraging means of access other than by car and through the submission of a Transport Assessment / Travel Plan if required. Any redevelopment scheme would need to take account of the biodiversity value, trees and designated open land, ensuring that these designations are not impacted upon. The preferred option provides significant opportunities to address the Heritage at Risk and very positive impacts for the local economy.</p>

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
<p>SA 3 Hampton Traffic Unit, 60-68 Station Road, Hampton</p>	<p>Option A: Retain status quo</p> <p>Option B: Residential, including affordable housing and pedestrian link through the site</p>	<p>Option A is not considered to make the most efficient use of land if the site is declared surplus to requirements by the Metropolitan Police (<i>which it has been since the original assessment</i>).</p> <p>Option B is considered to have positive as well as negative sustainability impacts, whereby the positive impacts were mainly in relation to the provision of housing. It also outlined some uncertainties in relation to biodiversity, OOLTI and OSNI, which would need to be addressed in a redevelopment proposal. The SA also identified the loss of community infrastructure (particularly the loss of a social/police service) and the loss of an opportunity for commercial development as negative impacts.</p>	<p>As part of the Local Plan Review process, updated information on need and evidence for employment, commercial or social and community infrastructure uses became available. The new evidence, together with the SA findings of the assessment of Option B at the previous stage, has informed the content of the Site Allocation within the Local Plan, which is as follows:</p> <p>Appropriate land uses include business (B1), employment generating and other commercial or social and community infrastructure uses. The Building of Townscape Merit has to be retained and a pedestrian link should be provided through the site.</p> <p>Potential mitigation measures, particularly in relation to a potential loss of social infrastructure, have been identified in the SA.</p>	<p>Overall, the preferred option is considered to have many positive sustainability impacts, by re-providing local social infrastructure/employment (generating) uses. This option is also considered to contribute to improving the townscape and the BTM. It also identified some positive impacts for the provision of housing, which could be considered if other options have been explored and discounted. (It is noted that since the SA was undertaken, approval was granted for a residential scheme, having considered social infrastructure policies.)</p>

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
<p>SA 7 Strathmore Centre, Strathmore Road, Teddington</p>	<p>Option A: Retain status quo</p> <p>Option B: Redevelop for residential including affordable (subject to relocation and alternative provision of existing nursery)</p>	<p>Overall, retaining the status quo is considered to be largely neutral. However, it is not considered to make the best use of previously developed land. In addition, the existing facilities are considered outdated and do not make a positive contribution to the local character/landscape.</p> <p>Option B is considered to be positive in terms of the provision of new, including affordable, homes. It would also replace a partly vacant/derelict site, thus making better use of previously developed land and contributing to the local character and area. Traffic and congestion could lead to some negative impacts but these could be mitigated through appropriate measures.</p>	<p>As part of the Local Plan Review process, updated information on need and evidence for social and community infrastructure uses became available. The new evidence, together with the earlier SA findings, has informed the content of the Site Allocation within the Local Plan, which is as follows:</p> <p>Social and community infrastructure uses and/or an affordable housing scheme with on-site car parking are the most appropriate land uses for this site.</p> <p>Potential mitigation measures, such as in relation to transport, have been identified in the SA.</p>	<p>Overall, the outcome of the SA revealed that the site could (continue to) provide space for community facilities, for which there is an identified need in the area. The preferred option would also allow for the provision of affordable housing as part of a mixed use scheme, which has been identified as a positive impact. An entirely residential-led scheme would only be acceptable if the social infrastructure policies can be addressed first.</p> <p>Given the low PTAL of the site, onsite parking is considered to be essential to mitigate local parking impacts and congestion.</p>

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
SA 8 St Mary's University, Strawberry Hill	<p>Option A: Retain status quo</p> <p>Option B: Retention and upgrading of university facilities, retention of playing field and some upgrading/rebuilding of out-dated facilities</p>	<p>Option A is considered to be largely neutral.</p> <p>Option B has identified some positive impacts but also some uncertainties as this is a constrained and sensitive site, with limited opportunities for new development. It identifies that renovations or refurbishments would need to be very sensitively designed and take account of MOL and the historic environment.</p>	<p>The Plan has taken Option B further and refined it as follows: Retention and upgrading of St Mary's University and its associated teaching, sport and student residential accommodation. Upgrade works to include refurbishment, adaptation, extensions and new build elements on site where appropriate. A Masterplan development brief, which encompasses the main campus in Strawberry Hill as well as Teddington Lock, together with new estates and student accommodation strategies, will be prepared in conjunction with the Council. This will guide future development for St Mary's University, both on and off site.</p>	<p>Overall, the SA identified some positive impacts, such as in relation to climate change adaptation and mitigation, but it also identifies a number of uncertainties, where the potential positive and negative impacts would depend on the final scheme. This is a constrained site and therefore any development proposal must respect the special character, location and setting of the site including the adjoining Grade I Listed buildings, the Historic Park and Garden, the BTMs the MOL and the surrounding Edwardian Villas within the Conservation Area.</p> <p>It is noted that a Masterplan and/or site development brief SPD will be prepared, and that some minor modifications are being proposed. The forthcoming Strawberry Hill Village Planning Guidance will also provide guidance and advice on design and local character.</p>

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
SA 11 Twickenham Stadium, Twickenham	<p>Option A: Retain status quo</p> <p>Option B: Continue to use as rugby sports ground, including leisure, mixed uses and residential.</p>	<p>Option A is considered to be largely neutral, although it could make better use of land, particularly in relation to the large car park to the north.</p> <p>Option B was overall considered to have positive impacts by making better use of previously developed land, particularly on the large car park to the north. There would however be significant impacts on local transport provision and road network, particularly with intensified uses including new housing, which would require mitigation. Uncertain impacts have also been identified in relation to biodiversity, landscape, townscape, and parks and open spaces, including the protected MOL on this site.</p>	<p>Following the assessment of options, as well as taking account of emerging evidence in relation to employment needs, Option B has been further refined as follows: Continued use and improvement of the grounds for sports uses. Appropriate additional facilities including a new east and north stand, indoor leisure, hotel or business uses, as well as hospitality and conference facilities, may be supported provided that they are complementary to the main use of the site as a sports ground.</p> <p>Possible mitigation measures have been identified in relation to parking and congestion as well as impacts on local amenity and biodiversity, including protected open land. The SA also identified some opportunities, such as in relation to improving connectivity between public open space.</p>	<p>Overall, the SA identified some positive impacts, such as in relation to making best use of land. However, the SA identified that there could be significant impacts on local transport provision and road network, particularly with intensified uses, which would require mitigation. Uncertain impacts have also been identified in relation to biodiversity, landscape, townscape, and parks & open spaces, although it is acknowledged that some of these would depend on the detailed design of a scheme and how it would impact upon sensitive receptors. Due to the potential impacts, it is considered more sustainable and preferable to focus on the continuation of the site for sports uses including associated and complementary facilities. It also considered preferable to require employment and employment generating uses first prior to consideration of housing.</p>

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
<p>SA 14 Kneller Hall, Whitton</p>	<p>The Council only became aware of the potential disposal of this site as part of the Local Plan Scoping consultation (SD-004) carried out in early 2016, to which the Defence Infrastructure Organisation (DIO) responded, following the announcement made by Mark Lancaster (Minister for Defence Personnel and Veterans) on 18 January 2016. When the Council prepared the Pre-Publication Local Plan (PS-009) for consultation, there were still very limited details available, and therefore it was decided not to allocate this site at that stage.</p>	<p>Following the Pre-publication consultation (PS-009), to which the DIO responded with further details, the Council decided to include an allocation for this site in the Publication version of the Plan, acknowledging that this site is soon to be vacant and to include a positively worded policy that supports mixed use development.</p> <p>Since summer/autumn 2016, the Council has been working in partnership with the DIO to consider this site. At that stage, it was also agreed that a Masterplan (SPD) would be prepared in collaboration.</p> <p>The policy wording of SA 14 is considered to provide sufficient flexibility to consider a variety of uses and options for the site, and the DIO (Representor ID 5), overall supports this Site Allocation. The DIO has commissioned an assessment to look at options for re-provision of the Royal Military School of Music.</p>	<p>The SA option assessed and considered the most sustainable, bearing in mind that a SPD, which will consider more detailed options, will be prepared in due course, is as follows: If the site is declared surplus to requirements, appropriate land uses include residential (including affordable housing), employment (B uses) and employment generating uses as well as social infrastructure uses, such as health and community facilities. Any proposal should provide for some employment floorspace, including B1 offices. The Council will expect the playing fields to be retained, and the provision of high quality public open spaces and public realm. This will include links through the site to integrate the development into the surrounding area as well as a new publicly accessible green and open space, available to both existing and new communities.</p>	<p>This option has been assessed as largely positive, provided that there will be new affordable homes and community uses on the site. Positive impacts and benefits should be realised as part of the redevelopment, such as in relation to preserving and retaining the heritage assets, biodiversity, open space and public access.</p> <p>As the Council, together with the DIO, is committed to developing a Masterplan (SPD), the SA to be carried out as part of the development of this SPD will inform the final preferred option. The SA process of the SPD will include a detailed analysis and consideration of options and alternatives for this site.</p> <p>Note that in August 2017 an Expression of Interest has been submitted to the Local Government Association by the Council with support from the DIO for One Public Estate (OPE) funding for this work.</p>

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
SA 15 Ham Close, Ham	<p>At the time the original SA for the Site Allocations Plan was carried out, Richmond Council and Richmond Housing Partnership (RHP) were in discussion about the rejuvenation of this site.</p> <p>The Council and RHP considered a range of options, from refurbishment of existing buildings through to possible redevelopment of the whole estate.</p>	<p>As this site was subject to very detailed consultation processes (e.g. with leaseholders and occupiers), which were separate to the plan-making process, it was agreed that the results would then be fed into the Site Allocations / Local Plan.</p> <p>Overall, as this is an existing housing estate, managed by a Registered Provider (RHP), and as the estate would continue to be in residential use, it is not considered appropriate or reasonable for the SA to assess alternatives other than for housing. It should also be noted that the number of units to be provided will be determined by other factors, including consultation with existing occupiers / leaseholders, consultation with the wider community, financial considerations and viability etc.</p>	<p>The consultation exercises carried out by RHP and the Council, including in particular financial considerations of the various options, the following has been identified as the most appropriate option:</p> <p>The Council supports the regeneration of Ham Close and will work in cooperation with Richmond Housing Partnership in order to rejuvenate Ham Close and its surrounding area.</p> <p>A comprehensive redevelopment of this site, including demolition of the existing building and new build re-provision of all residential and non-residential buildings, plus the provision of additional new residential accommodation, will be supported.</p> <p>The SA of the above option identified some positive as well as negative impacts, and it set out some potential mitigation measures that could be incorporated.</p>	<p>Overall, the SA identified some positive as well as some negative impacts but also some uncertainties, which will depend on the details of the final scheme.</p> <p>Positive impacts have been identified in relation to the provision of new housing, including affordable homes. The SA also identifies that a proposal may improve the general character and appearance of the local area.</p> <p>Some negative impacts identified in relation to travel and parking can be mitigated through ensuring sustainable modes of transport are encouraged and implemented, as well as through consideration of a Transport Assessment and submission of a Travel Plan, and likely to require an Environmental Impact Assessment.</p>

Site Allocation	Options and reasonable alternatives considered	Assessment of options and reasonable alternatives	How the SA has informed the content of the Plan / Site Allocation	SA findings of the preferred and final option within the Plan
SA 17 St Michael's Convent, Ham	<p>Option A: Retain status quo</p> <p>Option B: Conversion of buildings to residential (including affordable units) and education and/or community uses</p>	<p>Option A is considered to be largely neutral.</p> <p>Option B is considered to have positive sustainability impacts as well as some negative ones and uncertainties. The conversion of the existing buildings would provide new homes, community / education uses. The option is also likely to contribute to the preservation and enhancement of the Conservation Area and the Listed Building. The SA also identified that it should be investigated whether the open land and gardens to the rear should be protected as OOLTI.</p>	<p>Following the assessment of options, as well as taking account of emerging evidence in relation to social infrastructure needs, Option B has been further refined as follows: The Grade II listed St Michael's Convent and The Cottage have been declared surplus to requirements. Social and community infrastructure uses are the most appropriate land uses for this site. Conversion or potential redevelopment for residential uses could be considered if it allows for the protection and restoration of the Listed Buildings.</p> <p>The SA of the above option identified some positive as well as negative impacts, and it set out some potential mitigation measures that could be incorporated.</p>	<p>Overall, the SA identified some positive as well as some negative impacts but also some uncertainties, which will depend on the details of the final scheme.</p> <p>Positive impacts are related to the retention / reprovision of social and community infrastructure uses, and together with the possibility of some residential uses, this would also allow for the continued preservation of the Listed Building.</p> <p>The rear gardens are proposed to be designated as OOLTI and OSNI, which is considered to be positive in terms of protecting biodiversity and townscape.</p> <p>Some potential negative impacts have been identified due to the location of the site in a poor PTAL area.</p> <p>It is also noted that the emerging Ham and Petersham Neighbourhood Plan may set out further guidance for the design of this site.</p>

Appendix 2 – Analysis of site allocations to demonstrate that they are of sufficient detail so as to be effective in delivery:

Out of the 28 Site Allocations:

- 5 are Council owned sites that are considered to be effective in delivery as discussions for redevelopment are underway (i.e. SA 1 Hampton Square, SA 7 Strathmore Centre, SA 12 Mereway Day Centre, SA 20 Friars Lane Car Park, SA 22 Pools on the Park and surroundings)
- 1 site has already commenced and construction is underway (i.e. SA 9 Richmond upon Thames College)
- 1 site has already been subject to detailed consultations with the public and Richmond Council is working closely with Richmond Housing Partnership to on the regeneration of this housing estate (i.e. SA 15 Ham Close)
- 2 sites have had approval granted by Planning Committee (i.e. SA 18 Ryde House and SA 3 Hampton Traffic Unit, although the former has an outstanding S106 agreement to be signed)
- 1 site is subject to (a) live planning application(s) (i.e. SA 17 St Michael's Convent)
- 3 sites have already current and ongoing pre-application discussions (i.e. SA 24 Stag Brewery, SA 26 Kew Biothane Plant, SA 28 Barnes Hospital)
- 2 sites are subject to detailed Masterplan work, where the Council is working with the landowner to establish and define the development parameters and detailed land use requirements (i.e. SA 8 St Mary's University and SA 14 Kneller Hall)
- 3 sites are for allocations for sporting venues, some of which are of national significance, (i.e. SA 10 The Stoop, SA 11 Twickenham Stadium, SA 23 Richmond Athletic Association Ground). The Council has established effective working relationships with these landowners and key stakeholders, and is working closely in developing and refining options for redevelopment and / or facilities that complement existing sporting uses.
- 2 site allocations are specifically supported by the landowner and have been brought forward during the call for sites and subject rounds of public consultation (i.e. SA 2 Platts Eyot and SA 21 Sainsbury's, Lower Richmond Road). It can therefore be considered that they are sufficiently flexible and of sufficient details as to be deliverable.
- 2 sites have been subject to various discussions with the relevant landowners (i.e. SA 16 Cassel Hospital and SA 19 Richmond Station) and it is expected that these will come forward for development later during the Plan period.
- 6 sites relate to either BT Telephone Exchanges or Royal Mail Delivery Offices (i.e. SA 4 Hampton Delivery Office, SA 5 Telephone Exchange Teddington, SA 6 Teddington Delivery Office, SA 13 Telephone Exchange Whitton, SA 25 Mortlake and Barnes Delivery Office, SA 27 Telephone Exchange East Sheen). The Council has liaised with the landowners and received no objections to these allocations as it is anticipated that these could come forward for development during the Plan period.

In addition, it should be noted that the Council is liaising closely with the Education and Skills Funding Agency (ESFA) as well as the relevant landowners/developers to deliver the necessary educational infrastructure in the borough. This includes the ESFA's commitment for enabling the delivery of relevant school infrastructure projects on sites SA 9, SA 18, SA 24 and SA 28.

Appendix 3 – Justification and evidence base for OOLTI designation of gardens for SA 17 (St Michael’s Convent)

The following provides a detailed analysis of the St Michael’s Convent’s gardens against the OOLTI criteria as set out in paragraph 5.3.4 of Policy LP 14 (OOLTI). Taking each criterion in turn, it can be demonstrated that the OOLTI designation is justified and based on robust evidence:

- Contribution to the local character and/or street scene, by virtue of its size, position and quality – The area covered by these gardens is of significant size and not only contributes to, but largely defines the local character of this part of Ham Common. The site is valued by local people as evidenced by its recommendation for OOLTI protection by local Councillors and a large number of local residents. In addition, the designation of the gardens as OOLTI will also contribute to preserving and/or enhancing the setting of the Listed Building.
- Value to local people for its presence and openness – The substantial local support received throughout the development of this Plan for the designation of this site as OOLTI demonstrates that the gardens are of value to local people for its presence and openness. It should be noted that the Council has first published its intention to designate the gardens as OOLTI in August 2014, and strong local community support has been received ever since then.
- Immediate or longer views into and out of the site, including from surrounding properties – this is particularly relevant for the residents of Martingales Close, because its houses are on one side of the road only, the other side adjoining the Convent garden.
- Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure' – The garden lies in the Great South Avenue of Ham House, at the heart of the wildlife corridor. The gardens provide an important link as part of the green corridor in Ham, which runs between Richmond Park to the River Thames via Ham Common, St Michael's Convent and Avenue Lodge gardens, Grey Court School playing fields, Ham House avenues and gardens, and the Ham Lands.
- Value for biodiversity and nature conservation – The Council proposes to designate the gardens as Other Site of Nature Importance (OSNI) as part of the Local Plan due to its great environmental importance and biodiversity value (*see Appendix 4 below*).

The above demonstrates that this site meets all the criteria for OOLTI and can be soundly designated as such. The Council does not consider that the criteria for OOLTI designation are ‘open-ended’ as suggested by Beechcroft Developments Ltd (Representor ID 26, see page 234-237 of LBR-LP-002) as these have been duly considered and agreed by the Inspector who conducted the Development Management Plan examination in 2011 (PS-079).

Appendix 4 – Justification and evidence base for OSNI designation of gardens for SA 17 (St Michael’s Convent)

The Local Plan’s glossary sets out that OSNI have either been classified as having importance for biodiversity (regionally known as Sites of Importance for Nature Conservation) or the potential to have biodiversity.

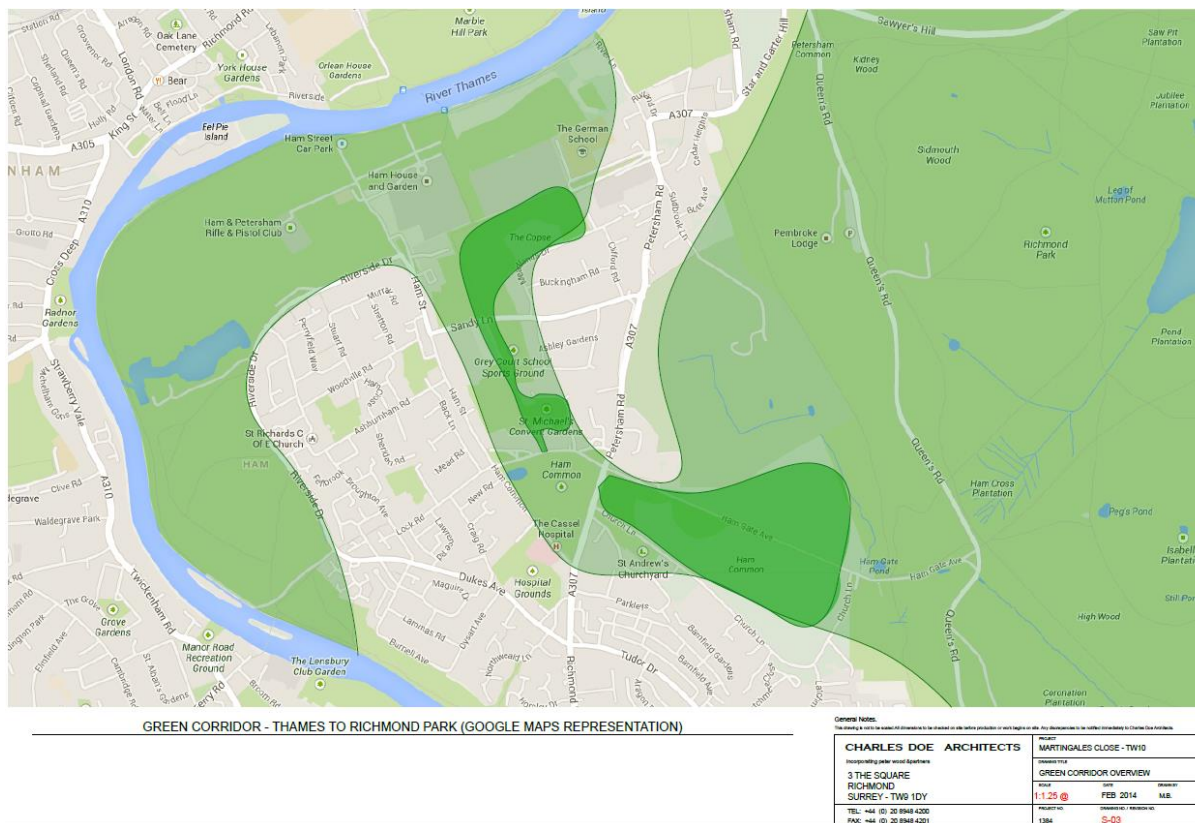
The evidence and justification for the designation of the gardens of St Michael’s Convent as OSNI are set out in the report produced on behalf of the Council by Salix Ecology in September 2016 (PS-065). Salix Ecology undertook the habitat surveys at a number of sites across the borough. The habitat surveys were undertaken in August 2016 by Paul Losse BSc (Hons), MSc, MCIEEM. Paul has extensive experience in carrying out vegetation surveys including using GLA protocol. The assessment of sites comprised of a desktop study involving the retrieval of species records (from Greenspace Information for Greater London) and site related information from associated organisations, including habitat surveys of each site employing GLA methodology.

In relation to the gardens of St Michael’s Convent, the ecology consultants considered that this site is an important part of the River Thames to Richmond Park Green Corridor. It contains a wide variety of native and non-native tree species – most notably a 300 year old black mulberry. 45 species of birds have been recorded including a number of Red 2 List species. Bats also commute across the area including Daubenton’s bat. The report also identifies the presence of an old orchard, which could qualify as a habitat of principal importance in England.

More specifically, the ecologist’s report states that there are three individual plants which particularly deserve to be preserved: (a) an aged mulberry tree said to be 300 years old (the same age as Orford House, the listed part of the convent building); this tree is very much alive but would benefit from specialist care to reduce the amount of dead wood; (b) a vine also said to be 300 years old (thought to have come from a cutting from Hampton Court); and (c) a fine Holm Oak *Quercus ilex* on the convent forecourt. The most environmentally significant feature of the flora of the garden is the number of mature trees, particularly concentrated in a belt on the convent side of the Martingales Close wall. The following species have been identified in this belt: *Cupressus* sp.; Holly; Honey Locust *Gleditsia triacanthos*; Oak; Lombardy Poplar; Golden poplar *Populus x canadensis* ‘Serotina aurea’; Sweet chestnut...’

The Inspector should note that the Council’s Ecologist spoke to the landowner Beechcroft Developments Ltd (Representor ID 26, see page 234-237 of LBR-LP-002) to ask permission for access to the site. At that point it was made clear that a habitat survey could indicate that the site is not worthy of a designation, but no response was received despite requests by telephone and email, and therefore access could not be gained. As per the correct process, Salix Ecology carried out a desk based survey, analysed local records (collated by local residents), aerial views and considered the site in a landscape context. It was the professional view and opinion of Salix Ecology that, despite not having an up to date habitat survey, due to the landscape setting and the 3 notable records (see above), the site warrants a designated status. The OSNI designation is not just important for species protection but also for providing wildlife corridors; the wildlife corridor from Richmond Park to

the River Thames is a very important corridor within the borough – see below a copy of the map showing this corridor.



To conclude, whilst it is acknowledged that access to the site could not be gained to carry out a detailed habitat survey, the site's ecological value was assessed via a data search and carried out by a professional independent consultant. It is therefore considered that the OSNI designation is sound and based on robust evidence.