

List of Proposed Minor Changes – Local Plan Publication version

Last Updated: 31 October 2017

A number of post submission changes have been put forward by the Council. **(PE = during hearing preparation)** before the Examination Hearings, and subsequently **EH = changes made during the Examination.**

These changes will be reviewed by the Examiner for significance, and if there are any Examination Hearing changes which in his view alter the thrust of, or otherwise change a policy in the Local Plan, they will require community engagement and sustainability appraisal.

This schedule contains the changes, set out in plan order.

Any changes identified by the Examiner that are required to make the Plan sound will be identified as main modifications later in the Examination. Main modifications will be set out in a separate Main Modifications Schedule, and subject to formal consultation, which along with an Addendum to the Sustainability Appraisal and all other information relating to the Examination will be available on the Council's website www.richmond.gov.uk/local_plan_examination

Schedule of proposed minor changes to the LB Richmond upon Thames Local Plan

Text proposed to be inserted in bold blue underlined

Pre-Hearing Examination change = PE

Text proposed to be removed in ~~red strikethrough~~

EH = changes made during the Examination

Change Ref.	Policy Section or heading	Page /Paragraph	Proposed change	Reason for the change
PE/Intro/1	Introduction	p.4 paragraph 1.1.4	In the paragraph 1.1.4 of the Introduction, (Setting the Scene) amend the last sentence to read: “The Council will ensure that planning applications that accord with the policies in the adopted Local Plan and the London Plan (and where relevant, with policies in <u>emerging neighbourhood plans, such as</u> the Ham and Petersham Neighbourhood Plan once adopted) will be approved without delay, unless material considerations indicate otherwise.”	For clarification
EH/SC/1	Strategic Context	p.10-11	New paragraph and sub-heading after 2.1.11 and before “Village Planning” <u>“Neighbourhood Planning</u> <u>Neighbourhood Planning was introduced by the Localism Act 2011. It allows communities to influence the future of their local areas by preparing a Neighbourhood Development Plan for the area.</u> <u>Neighbourhood plans are led and written by the community, not the Council, and they have to be in general conformity with the strategic policies in the relevant local, regional and national planning policy documents and guidance. A neighbourhood plan that is prepared in line with the legal requirements and supported by a majority in a local referendum must be adopted by the Council. When adopted, a neighbourhood plan becomes part of the statutory development plan and will be taken into account alongside the Council’s other plans when making decisions on planning applications in that area. In this borough, the Ham and Petersham Neighbourhood Forum is preparing a Neighbourhood Plan for its area.”</u>	Further to discussions in Hearing Session 1, to provide clarity on Neighbourhood Planning and Village Plan process and SPDs.

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		paragraph 3.1.4	Change to paragraph 3.1.4: 3.1.4 The Spatial Strategy reinforces the borough's context as an outer London Borough that is characterised by a high quality natural, built and historic environment with highly valued open landscape, parks, green spaces and opportunities for sport, recreation, culture and tourism. The overarching principles are to protect the unique local character (as set out in the Village Planning Guidance SPDs and in neighbourhood plans, such as in the emerging Ham and Petersham Neighbourhood Plan), maintain and enhance our open spaces as well as our heritage, achieve high levels of sustainability and ensure all communities have access to housing, employment opportunities, services and facilities.	
PE/SV/1	Strategic Vision	p.12	Change first sentence of "Residential Quality of Life" paragraph (Local Plan Strategic Vision) Page 12, to read as follows: "Richmond borough will be the best place in London to live as a result of the quality of the built environment which considers the health and wellbeing of local residents and the high quality design of new development that respects and enhances its distinctive character."	Minor amendment to enhance the importance of health and wellbeing in the borough
PE/SV/2	Strategic Vision	p.12 paragraph: 2.2.1	The following minor change is proposed to Section 1 of the Local Plan Strategic Vision (Page 12, paragraph 2.2.1) to read as follows: " Heritage assets including listed buildings and Conservation Areas , historic parks , as well as Royal Botanic Gardens, Kew World Heritage Site ..."	It is considered that the suggested minor change will help to clarify the important role that heritage assets play in defining the character of the borough and ensure that this is captured within the Strategic Vision, as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
PE/SV/3	Strategic Vision	p.14	Change second sentence of "Facilities to Meet Needs" paragraph (Local Plan Strategic Vision) Pages 13-14, to read as follows: "They will have	To stress the importance of health and wellbeing in the

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			access to a range of exceptional educational and training facilities, including a choice of schools and nurseries, community and healthcare facilities, shops and services as well as employment and recreational activities."	borough.
PE/SS/1	Spatial Distribution of Development	p.24 paragraph 3.1.39	Under Twickenham, 2 nd sentence, on 4 th line alter to read: "The former Post Office Sorting office, Twickenham Station, Richmond upon Thames College, Harlequins Rugby... "	A minor change is proposed to ensure it is clear that " <i>Richmond College</i> " refers to Richmond upon Thames College. This reference will be updated in all other areas of the Plan, including paras 3.1.39, 3.1.41, 5.7.4, 8.2.11 and 13.1.7.
PE/SS/2	Spatial Distribution of Development	p.25 paragraph 3.1.41	Under Teddington, East Sheen and Whitton add "Upon Thames" into the first sentence of para. 3.1.41 to read : "There are also other significant development areas outside of the above five main centres, such as Stag Brewery in Mortlake, Ham Close in Ham, Richmond upon Thames College in Twickenham and Barnes Hospital in East Sheen."	A minor change is proposed to ensure it is clear that " <i>Richmond College</i> " refers to Richmond upon Thames College. This reference will be updated in all other areas of the Plan, including paras 3.1.39, 3.1.41, 5.7.4, 8.2.11 and 13.1.7.
PE/LP1/1	Local Character and Design Quality	p.28 Policy LP1	Amend the last paragraph of part A. of the policy LP1 to read: "All proposals, including extensions, alterations and shop fronts, will be assessed against the policies contained within a neighbourhood plan where applicable , and the advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design."	For clarification
EH/LP1/2	Local Character and Design Quality	p.28 Policy LP 1	Change last sentence of LP 1 Part B as follows: "In sensitive areas, such as Conversation Areas and relevant Character Areas as identified in the Village Planning Guidance SPDs , rigid and gloss finish blinds will generally be unacceptable."	Further to discussions in Hearing Session 5, to clarify reference to sensitive areas.
EH/LP1/3	Local Character	p.29	Amend para 4.1.2 as follows:	Further to discussions in

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	and Design Quality	Paragraph 4.1.2	4.1.2 Village Planning Guidance SPDs have been or are being developed for the village areas (with the exception of Ham and Petersham, where the designated Neighbourhood Forum is developing its own Neighbourhood Plan for the area). The SPDs identify the key features and characteristics of the village areas that are valued by local communities. <u>Each village area has been subdivided into Conservation Areas and Character Areas, and for each area the context, character and local features have been analysed and assessed.</u> The Village Planning Guidance SPDs are the main starting point for design guidance to those seeking to make changes to their properties or to develop new properties in the area. The Council has also developed a range of other SPDs, including on Design Quality, House Extensions and External Alterations, Small and Medium Housing Sites, Front Gardens and Shopfronts. These focus on protecting and improving the quality of the local built environment and provide the necessary detail to assess context, local character and design quality.	Hearing Session 5, to clarify reference to sensitive areas.
PE/LP2/1	Building Heights	p.31/ paragraph: 4.2.2	Bullet point 4, 2nd line: "... including Richmond <u>upon Thames</u> College, Twickenham Rugby Stadium, ... etc."	A minor change is proposed to ensure it is clear that " <i>Richmond College</i> " refers to Richmond <u>upon Thames</u> College. This reference will be updated in all other areas of the Plan, including paras 3.1.39, 3.1.41, 5.7.4, 8.2.11 and 13.1.7.
PE/LP2/2	Building Heights	p.31 Policy LP 2	"The Council will require new buildings, <u>including extensions and redevelopment of existing buildings</u> , to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights, by the following means..."	To clarify that that if a redevelopment were proposed, improvements to the existing architectural design quality would be sought, as well as public realm benefits and the impact on the character and

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				quality of the area would be assessed.
EH/LP2/3	Building Heights	p.31 Policy LP 2	<p>Amend criterion 1 as follows:</p> <p>1. require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; <u>proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area;</u></p> <p>Delete criterion 6:</p> <p>5. refrain from using height to express and create local landmarks; <u>and</u> 6. resist buildings that are taller than the surrounding townscape other than in exceptional circumstances, such as where the development is of high architectural design quality and standards, delivers public realm benefits and has a wholly positive impact on the character and quality of the area; and 7.6. require full planning applications for any building that exceeds the prevailing building height within the wider context and setting.</p>	Further to discussions in Hearing Session 5, to clarify relationship between criteria 1 and 6.
PE/LP3/1	Designated Heritage Assets	p.33 Policy LP 3	<p>Paragraph A. "The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. <u>Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal.</u> The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, Listed Buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens will be conserved and enhanced by the following means:"</p>	Whilst the Council considers policy LP 3 to be in general conformity with the NPPF, the Council would be amenable to the following minor change suggested by Heritage England within the Introductory paragraph (A) if the Inspector considers this necessary to make the Plan 'sound', on LP3 as set out in Statement of Common Ground with Historic

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				England (7 September 2017) (LBR-LP-008).
PE/LP3/2	Designated Heritage Assets	p.33 Policy LP 3	<i>Point 2.</i> "Consent for demolition of Grade II Listed Buildings will only be granted in exceptional circumstances and for Grade II* and Grade I Listed Buildings in wholly exceptional circumstances following a thorough assessment of their <u>the justification for the proposal and the significance of the asset.</u> "	To provide a useful clarification in relation to the level of justification required for the Consent for demolition of a Listed Building and to reflect paras 132 and 133 of the NPPF
PE/LP3/3	Designated Heritage Assets	p.34 Policy LP 3	-Insert 2 further points under Section A of Policy LP 3 <u>"8. Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.</u> <u>9. Protect Scheduled Ancient Monuments, including their settings, by ensuring proposals do not have an adverse impact on their significance."</u>	Whilst the Council considers that these categories are already explicitly referred to under Designated Heritage Assets (Section A) of Policy LP 3, it is considered that additional criteria could be added to this section of the policy to provide greater clarity in relation to the Historic Parks and Gardens as well as the Scheduled Ancient Monuments, as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
EH/LP3/4	Designated Heritage Assets	p.34 Paragraph 4.3.2	Amend paragraph 4.3.2, 3 rd sentence as follows: "As at 2017 2016 , the borough has 75 72 designated Conservation Areas.	Factual updates
EH/LP3/5	Designated Heritage Assets	p.34 Policy LP 3	Amend criterion agreed as part of Statement of Common Ground as follows and update previous change PE/LP3/3: <u>9. Protect Scheduled Ancient Monuments, including their settings, by ensuring proposals do not have an adverse impact on their significance.</u>	Further to discussions in Hearing Session 5, to correct reference to Scheduled Monuments and reflect that

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				setting is part of significance, as agreed with Historic England.
EH/LP3/6	Designated Heritage Assets	p.33 Policy LP 3 Paragraph 4.3.9	<p>Minor amendments to Part A as follows:</p> <p>3. Resist the change of use of <u>L</u>isted <u>B</u>uildings where <u>their significance would be harmed</u>this would materially harm their character and distinctiveness, particularly where the current use contributes to the character of the surrounding area and to its sense of place.</p> <p>Amend the first sentence of paragraph 4.3.9 of the supporting text as follows:</p> <p>4.3.9 Listed <u>B</u>uildings are best used for their original purpose and therefore the Council will resist the change of use of a <u>L</u>isted <u>B</u>uilding where this would <u>materially</u> harm its <u>significance in relation to heritage interest and</u> character <u>and distinctiveness</u>.</p>	Further to discussions in Hearing Session 5, to clarify the relationship between use and heritage interest/significance, using NPPF and NPPG terminology; the amendment has been agreed with Historic England.
EH/LP4/1	Non-Designated Heritage Assets	p.36 Policy LP 4	<p>Move the following policy text into the supporting text at a new paragraph after paragraph 4.4.3:</p> <p>4.4.4 Applicants will be required to:</p> <ol style="list-style-type: none"> 1) retain the character of Buildings of Townscape Merit, war memorials and any other non-designated heritage assets; 2) submit a Heritage Statement to assess the potential harm to, or loss of, the significance of the non-designated heritage asset, including from both direct and indirect effects; 3) describe the significance of the non-designated heritage asset affected, including any contribution made by their setting; the extent of the relevant setting will be proportionate to the significance of the asset. Appropriate expertise should be used to assess a non-designated heritage asset; and 4) retain or restore the structures, features and materials of the asset, which contribute to its architectural integrity and historic interest. 	Further to discussions in Hearing Session 5, to take a consistent approach in LP3 and LP4.
PE/LP5/1	Views and	p.37	In criterion 5., change as follows:	To provide clarification, as

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	Vistas	Policy LP 5	“ <u>Seek</u> improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured will be encouraged where appropriate. ”	agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
PE/LP5/2	Views and Vistas	p.37 Policy LP 5	Amend criterion 6. c. of policy LP 5 as follows: “ <u>are affected by development on sites within the setting of, or adjacent to, conservation areas and listed buildings</u> ” “affect the setting of and from development on sites adjacent to Conservation Areas and Listed Buildings.”	For clarification purposes, part 6 (c) relates to the wider setting of the Conservation Area and the impact of developments adjacent to Conservation Areas, as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
EH/LP5/3	Views and Vistas	p.38 Paragraph 4.5.3	Change to 4.5.3, penultimate sentence: “The protection and enhancement of the strategic view from King Henry's Mound to St Paul's will be achieved by consultation between boroughs <u>the relevant planning authorities in London, including the Greater London Authority.</u> ”	Further to discussions in Hearing Session 5, to clarify that the requirement to protect the strategic view is done in co-operation by all decision-making authorities.
PE/LP7/1	Archaeology	p.40 paragraph: 4.7.3	Amend 3 rd line, 2 nd sentence as follows: "The borough's APAs are due to be reviewed in 2018 <u>2017</u> by GLAAS as part of a rolling programme of reviews across London."	A minor change is proposed to paragraph 4.7.3 as GLAAS have confirmed that the APA review will now take place in 2017 rather than 2018.
PE/LP8/1	Amenity and Living Conditions	p.41 Policy LP 8	Final paragraph in Policy LP 8 states that “Applicants are expected to comply with the Council's SPDs relating to design, including Village Planning Guidance, SPDs on extensions, infill and backland developments, housing mix and standards as well as residential development standards.” Replace “ expected to comply with... ” with “ <u>expected to follow the guidance set out within</u> the Council’s...”	To signpost to the further advice and guidance set out in SPD, as envisaged by national policy
EH/LP8/2	Amenity and	p.41	Amend LP 8 criterion 2 to read:	Further to discussions in

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	Living Conditions	Policy LP 8 p.42 Paragraph 4.8.8	2. ensure there is <u>seek</u> a minimum distance of 20 metres... Amend paragraph 4.8.8 to read: Whilst there will be some impact from any new development, the test is one of harm in relation to the impact on habitable rooms, which includes all separate living rooms and bedrooms, plus kitchens with a floor area of 13sqm or more. The minimum distance of 20 metres between habitable rooms within residential development is for privacy reasons; a greater distance may be required for other reasons, or a lesser distance may be acceptable in some circumstances. <u>These numerical guidelines should be assessed on a case by case basis, since privacy is only one of many factors in site layout design; where the established pattern of development in the area (layout and height) may favour lesser distances.</u> The distance of 20 metres is generally accepted as the distance that will not result in unreasonable overlooking. Where principal windows face a wall that contains no windows or those that are occluded (e.g. bathrooms), separation distances can be reduced to 13.5 metres. <u>Where the impact of a building is on another within the same development site, measures can also be applied to minimise overlooking, such as splays, angles of buildings, obscure glazing etc. A Supporting Planning Statement should set out justification for a reduction in these distances.</u>	Hearing Session 5, to reflect the Council's flexibility in policy implementation. To clarify the references to minimum distances are a reasonable starting point in the borough context, to provide clear guidance for developers and existing occupants, while recognising an assessment will be made on a case by case basis.
EH/LP10/1	Local Environmental Impacts, Pollution and Land Contamination	p. 44 Policy LP 10	Delete 'where practicable' from LP 10, Part B, and insert 'at least': "Developers should commit to <u>at least</u> 'Emissions Neutral' development where practicable. "	Further to discussions in Hearing Session 5, to bring the policy requirement in line with Policy 7.14 of the London Plan, which states that development proposals should "be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality...".

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EH/LP10/2	Local Environmental Impacts, Pollution and Land Contamination	p.45 Paragraph 4.10.3	Amend paragraph 4.10.3 as follows: The Council will be preparing SPDs <u>and/or Advice Notes to provide additional guidance</u> on local environmental impacts, pollution, <u>air quality</u> , and noise <u>and construction management</u> , which will contain further guidance and clear requirements, including methodologies, for the various assessments that may need to be submitted as part of certain types of planning applications.	Further to discussions in Hearing Session 5, to provide clarification in relation to emerging and forthcoming SPDs and guidance.
EH/LP10/3	Local Environmental Impacts, Pollution and Land Contamination	p.45 Paragraph 4.10.5	Insert within paragraph 4.10.5 the following: “The whole of the borough has been declared as an Air Quality Management Area (AQMA) and as such any new development and its impact upon air quality must be considered very carefully. <u>Strict mitigation will be required for any developments proposed within or adjacent to ‘Air Quality Focus Areas’.</u> <u>An ‘Air Quality Focus Area’ is a location that has been identified as having high levels of pollution (i.e. exceeding the EU annual mean limit value for nitrogen dioxide) and human exposure. Air Quality Focus Areas are designated by the Greater London Authority.</u> The Council will consider the impact of introducing new developments to areas already subject to poor air quality, and the impact on the new occupiers of that development, especially in sensitive uses such as schools.”	Further to discussions in Hearing Session 5, to ensure that the Air Quality Focus Areas, as designated by the Greater London Authority, and updated on a regular basis, are referred to within the supporting text.
EH/LP10/4	Local Environmental Impacts, Pollution and Land Contamination	p.45 Policy LP 10	Amend last sentence of LP 10 as follows: <u>Where applicable and considered necessary,</u> t he Council will seek a <u>bespoke</u> charge <u>specific to the proposal</u> to cover the cost of monitoring the CMS; a discount may be applied if the applicant/developer uses the Council’s Building Control services.	Further to discussions in Hearing Session 5, to ensure that monitoring fees are specific to a proposal and in line with CIL regulations.
PE/LP11/1	Subterranean developments and basements	P.47 Policy LP 11	Re-word Criterion 1 in basement policy from: ‘not extend beneath...’ To: <u>‘extend to no more than...’</u>	To provide clarification
PE/LP11/2	Subterranean developments	p.47 Policy LP11	Re-word Point C. in the basement policy to read: “Proposals for subterranean and basement developments, including	As recommended by the Council’s Scrutiny Panel

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	and basements		extensions, as well as lightwells and railings, will be assessed against the advice set out in the Council's SPDs relating to character and design as well as the relevant Village Planning Guidance and the forthcoming SPD on Basements and Subterranean Developments .	
PE/LP11/3	Subterranean developments and basements	p.47 paragraph 4.11.1	Add a sentence at the end of paragraph 4.11.1 of LP11 that reads: “The Council has made two Article 4 Directions, which come into effect on 1 April 2018, to remove permitted development rights across the whole borough for basement and subterranean developments.”	A minor change is proposed to reflect the emerging Article 4 Direction
PE/LP11/4	Subterranean developments and basements	P.49 paragraph: 4.11.12	4 th line, insert new 2 nd sentence after “Listed Building.” “Due to the potential irreversible detrimental harm to the historic integrity and risks to structural damage, particular care and attention needs to be taken where a subterranean or basement could affect a designated heritage asset, such as a Listed Building or the associated garden land of a Listed Building. Proposals will also need to consider the potential archaeological impacts in Archaeological Priority Areas (APAs) where relevant. Therefore, where a subterranean development or basement is added...”	To provide clarity in relation to proposals for subterranean developments within APAs, as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
PE/LP12/1	Green Infrastructure	p.52 paragraph 5.1.1	Add a cross reference to Chapter 4 after the 2 nd sentence of paragraph 5.1.1 as follows: “The need to protect the historic significance of the borough’s exceptional landscapes is set out in Chapter 4: Local Character and Design.”	For clarification purposes, as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
EH/LP12/2	Green Infrastructure	p.52 Policy LP 12	Minor amendments for clarification: LP 12, 1 st sentence: “Green infrastructure is a network of multi-functional green spaces and natural green features elements , which provides multiple benefits for people, nature and the economy. LP 12, Part A, criterion a: “the need to protect the integrity of the green spaces and features assets that are part of the wider green	Further to discussions in Hearing Session 5, to clarify Green Infrastructure terminology for consistency.

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			infrastructure network..."	
			LP12, Part A, criterion c: "incorporating green infrastructure features assets , which make a"	
EH/LP12/3		p.53 Paragraph 5.1.2	Para 5.1.2 of LP 12: The assets green spaces and green features that contribute to and make up the overall green infrastructure network range from borough-wide and strategic features such as parks, watercourses, woodlands to local features such as playgrounds, sports pitches, allotments, public open spaces, trees, woodlands, private gardens and other green spaces used for recreational purposes. There are also other features assets such as highway verges, railway embankments as well as site-specific elements such as green roofs and green walls that are considered to be part of the wider green infrastructure network.	Further to discussions in Hearing Session 5, to clarify Green Infrastructure terminology for consistency.
EH/LP13/1	Green Belt	p.55	Add footnote to LP 13: <u>The land at Twickenham and Fulwell golf courses is held under "The Green Belt (London and Home Counties) Act, 1938. An Act to make provision for the preservation from industrial or building development of areas of land in and around the administrative county of London." Under this Act owners are required to request permission from the Secretary of State to build on or dispose of this land. This requirement is separate from and in addition to any requirements for planning permission. Most of this land is protected in the Borough's Local Plan and London Plan by its designation as Metropolitan Open Land under Policy LP 13 and Policy 7.17 respectively. However, it is not covered by any planning policy Green Belt designation in the terms described by the NPPF, London Plan and Local Plan.</u>	Minor modification regarding the Green Belt Act.
EH/LP14/1	Other Open Land of Townscape Importance	p.57 Paragraph 5.3.1	Amend paragraph 5.3.1 as follows: "The purpose of this policy is to safeguard open land of local importance and ensure that it is not lost to other uses without good cause. Areas designated as Other Open Land of Townscape Importance (OOLTI) form	Further to discussions in Hearing Session 5, to confirm the process for new OOLTI designations is through the

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			an important part of the multi-functional network of Green Infrastructure and they can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. <u>New areas for OOLTI designation can only be identified when a plan is being prepared or reviewed.</u> The <u>existing</u> designated areas are shown on the <u>Proposals Policies</u> Map.”	Local Plan process.
EH/LP14/2	Other Open Land of Townscape Importance	p.57 Paragraphs 5.3.3 and 5.3.5	Delete paragraphs 5.3.3 and 5.3.5 of the supporting text of the OOLTI policy as follows: 5.3.3 This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value, and therefore merit protection. 5.3.5 This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value, and therefore merit protection.	Further to discussions in Hearing Session 5, to confirm the process for new OOLTI designations is through the Local Plan process.
EH/LP14/3	Other Open Land of Townscape Importance	p.57 Paragraph 5.3.4	Add to the last bullet point the following: <ul style="list-style-type: none"> Value for biodiversity and nature conservation <u>and meets one of the above criteria.</u> 	Further to discussions in Hearing Session 5, to clarify the criteria in relation to biodiversity and nature conservation is not a sole criterion in defining OOLTI.
PE/LP15/1	Biodiversity	p.59 Paragraph: 5.4.6	- in paragraph 5.4.6, add the phrase <u>“external lighting”</u> into the second sentence after “buildings”	For clarity
PE/LP15/2	Biodiversity	p.60 Paragraph: 5.4.8	- in paragraph 5.4.8, add the phrase <u>“and connectivity”</u> . after “important wildlife sites” at the end of the first sentence	For clarity
PE/LP17/1	Green Roofs and Walls	p.63 Paragraph 5.6.5	Insert into 2nd sentence: "Green roofs and photovoltaic panels or solar thermal units can be used together and green roofs <u>may</u> increase the efficiency of solar photovoltaic panels by regulating temperature."	As theoretically true but not necessarily always the case.

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PE/LP18/1	River Corridors	p.64 Policy LP 18	The following change is proposed to LP18: - Public Access C. c. to read as follows: "Provide new public access to the riverside and the foreshore where possible, <u>and maintain existing points of access to the foreshore subject to health and safety considerations.</u> There is an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside and foreshore. "	To address the PLA's concern in relation to safety, as agreed in Statement of Common Ground with Port of London Authority (31 August 2017) (LBR-LP-007).
PE/LP18/2	River Corridors	p.64 Policy LP 18	The Council to consider adding a new criterion C.d. to read as follows: <u>"Provide riparian life-saving equipment where required and necessary."</u>	To address the PLA's concern in relation to safety, as agreed in Statement of Common Ground with Port of London Authority (31 August 2017) (LBR-LP-007).
PE/LP18/3	River Corridors	p.65 paragraph 5.7.4	2 nd sentence, alter to read: "Where appropriate, developments alongside and adjacent to the River Crane should contribute to the overarching aim of creating a new metropolitan park that provides a continuous, accessible link between Hounslow Heath <u>and the River Thames</u> , and Twickenham Station (which is now largely realised) , <u>incorporating river restoration works along the lower Crane</u> , including a long distance footpath, improved access for surrounding communities and an enhanced wildlife corridor."	To correct a factual error
PE/LP18/4	River Corridors	p.65 paragraph 5.7.4	Last sentence change to read : "This applies in particular to the following development sites that are considered to be within the River Crane and the connecting Duke of Northumberland River corridor: Richmond <u>upon Thames</u> College, Twickenham Station, Greggs Bakery, The Stoop, Twickenham Stadium, the Depot and Mereway Day Centre."	A minor change is proposed to ensure it is clear that "Richmond College" refers to Richmond <u>upon Thames</u> College. This reference will be updated in all other areas of the Plan, including paras 3.1.39, 3.1.41, 5.7.4, 8.2.11 and 13.1.7.
PE/LP18/5	River Corridors	p.65	<u>"The Tidal Thames within the London Borough Of Richmond is within</u>	To reflect the emerging marine

Change Ref.	Policy Section or heading	Page /Paragraph	Proposed change	Reason for the change
		insert new paragraph after 5.7.5	<u>the South East Inshore Marine Plan area. A plan for this area will be prepared by the Marine Management Organisation at a future date. Until the marine plan is adopted, the Marine Policy Statement takes precedence and requires that all authorisation or enforcement decisions are made in accordance with the said Statement for any planning activity below mean high water springs, including sections of a tidal river.</u>	planning regime
EH/LP20/1	Climate Change Adaptation	p.70 Paragraph 6.1.3	Add to paragraph 6.1.3 the following: “In this policy, 'new development' applies to new build development of 1 dwelling unit or more as well as to new build (including extensions) of 100sqm or more of non-residential floor space. <u>Further guidance and advice is set out in the Sustainable Construction Checklist SPD, which has to be submitted as part of the planning application.</u> ”	Further to discussions in Hearing Session 5, to clarify the relationship with the SPD.
PE/LP21/1	Flood Risk and Sustainable Drainage	p.73 Policy LP21	Section B Basements and subterranean developments, 2 nd row of table “ In areas of Extreme, Significant and Moderate Breach Hazard (as set out in the Council's SFRA): New basements: restricted to Less Vulnerable / Water Compatible use only.” add after – “ ‘More Vulnerable’ uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed. <u>Bedrooms at basement level will not be permitted.</u> ” - add after “ ‘Highly Vulnerable’ <u>such as self-contained basements/bedrooms</u> uses will not be permitted.”	To ensure the policy clearly reflects the evidence and recommendations as set out in the Council's SFRA and/or in national planning policy and guidance
PE/LP21/2	Flood Risk and Sustainable Drainage	P.73 Policy LP21	Section B. Basements and subterranean developments, 2 nd row of table, amend as follows: “ In areas of Low or No breach Hazard (as set out in the Council’s SFRA): • New basements: if the Exception Test (<u>where applicable</u>) is passed, basements may be permitted for residential use where they are <u>not</u> self-contained or used for bedrooms.	To ensure the policy clearly reflects the evidence and recommendations as set out in the Council's SFRA and/or in national planning policy and guidance
PE/LP21/3	Flood Risk and Sustainable	p.73 Policy LP21	Section B. Basements and subterranean developments , 3 rd row of table concerning Flood Zone 2, amend as follows:	For clarity and to reflect national policy guidance.

Change Ref.	Policy Section or heading	Page /Paragraph	Proposed change	Reason for the change
	Drainage		<ul style="list-style-type: none"> New basements: if the Exception Test (<u>where applicable</u>) is passed, basements may be permitted for residential use where they are <u>not</u> self-contained or used for bedrooms. 	
PE/LP21/4	Flood Risk and Sustainable Drainage	p.75 Flood Risk Assessments paragraph: 6.2.8	Add after paragraph 6.2.8: <u>“All new development needs to take account of the latest climate change allowances. This should be included as part of the Flood Risk Assessment process. This will help minimise vulnerability and provide resilience to flooding in the future.”</u>	To ensure the policy clearly reflects the evidence and recommendations as set out in the Council's SFRA and/or in national planning policy and guidance
EH/LP21/5	Flood Risk and Sustainable Drainage	p.72 Policy LP 21	Amend second paragraph of LP 21 as follows: In <u>Flood Zones 2 and 3</u> areas at risk of flooding , all proposals on sites of 10 dwellings or more or 1000sqm of non-residential development or more, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted.”	Further to discussions in Hearing Session 5, to clarify that this requirement applies in Flood Zones 2 and 3.
EH/LP21/6	Flood Risk and Sustainable Drainage	p.75 Paragraph 6.2.4	Amend paragraph 6.2.4 of LP 21 as follows: “The Council's unique <u>bespoke</u> approach to the Sequential Test recognises that...”	Further to discussions in Hearing Session 5, to clarify that this is a Richmond-specific and bespoke approach.
PE/LP22/1	Sustainable design and construction	p.78 Policy LP22	A. Developments will be required to achieve the highest standards of sustainable design and construction in order to mitigate against the <u>likely effects of</u> climate change.	For clarification and to correct a grammatical error
PE/LP22/2	Sustainable design and construction	p.78 Policy LP22	Replace “to comply with...” with <u>“to complete...”</u> in Policy LP 22 Part A. point 1 to read: “Development of 1 dwelling unit or more, or 100sqm or more of non-residential floor space (including extensions) will be required to comply with <u>to complete</u> the Sustainable Construction Checklist SPD. A completed Checklist has to be submitted as part of the planning application.”	For clarity and to reflect S38(6) of the Town and Country Planning Act 1990 (as amended)
PE/LP22/3	Sustainable design and construction	p.79 Policy LP22	Replace “to comply with...” with <u>“to complete and submit...”</u> in Policy LP 22 Part E. 2 nd sentence to read: “Householder extensions and other development proposals that do not meet the thresholds set out in this	For clarity and to reflect S38(6) of the Town and Country Planning Act 1990 (as amended)

Change Ref.	Policy Section or heading	Page /Paragraph	Proposed change	Reason for the change
			policy are encouraged to comply with to complete and submit the Sustainable Construction Checklist SPD as far as possible, and opportunities for micro-generation of renewable energy will be supported in line with other policies in this Plan.”	
PE/LP22/4	Water efficiency	p.80 paragraph 6.3.6	Amend first sentence to read: “A number of water saving measures and equipment may be incorporated into development to achieve comply with the maximum water consumption levels set out in Part A, criterion 2 above: ”	For clarity
EH/LP22/5	Sustainable design and construction	p.79 Policy LP22	Amend Part B criterion 3 to read: 3. All major non-residential buildings over 100sqm should achieve a 35% reduction. From 2019 all major non-residential buildings should achieve zero carbon standards in line with London Plan policy.	For clarity and consistency, to reflect the requirements set out in the table of paragraph 6.3.24.
PE/LP24/1	Waste management	p.85 Policy LP 24	Amend Policy LP24 point 1 as follows: “All developments, including conversions and changes of use are required to provide adequate refuse and recycling storage space and facilities, which allows for ease of collection and which residents and occupiers can easily access, in line with the guidance and advice set out in the Council’s SPD on Refuse and Recycling Storage Requirements.”	For clarity and to reflect S38(6) of the Town and Country Planning Act 1990 (as amended)
PE/LP24/2	Waste management	p.86 Paragraph 6.5.3	Amend paragraph 6.5.3 to read: “ This policy ensures that all development proposals provide adequate refuse and recycling storage space and facilities to serve new developments, in line with the guidance and advice set out in the Council’s SPD on Refuse and Recycling Storage Requirements	For clarity and to reflect S38(6) of the Town and Country Planning Act 1990 (as amended)
EH/LP24/3	Waste management	p.86	Add new paragraph after paragraph 6.5.6 as follows: <u>The existing waste management sites as set out in Appendix 2 of the West London Waste Plan were identified at a snapshot in time. This list can be revised with new waste sites, permissions and licences granted by the Council or Environment Agency. The Council carries out regular monitoring of existing waste sites, the results of which, including maps of operational sites, are published as part of the Authority’s Monitoring Report.</u>	Further to discussions in Hearing Session 5, to clarify the approach to existing waste sites. Note to Inspector: The Council has considered the inclusion of the existing waste management

Change Ref.	Policy Section or heading	Page /Paragraph	Proposed change	Reason for the change
				<p>sites as set out in the West London Waste Plan (WLWP) within the Policies Map. However, as existing operations may cease and new waste sites may be permitted, it has been agreed with the other WLWP authorities to include updates to existing waste management sites within the Authority's Monitoring Report (AMR), which is available at https://www.richmond.gov.uk/authority_monitoring_report, and which identifies on a regular basis if any site is no longer in operational use for waste management purposes. In addition, the AMR includes maps to clarify the current extent of each operational site where this is known.</p>
EH/LP25/1	Development in Centres	p.88 LP 25	Add comma to LP 25.A.3 to read: For retail developments, including extensions, of over 500sqm gross, the Council will require a Retail Impact Assessment. ...	For clarity that all developments over 500sqm will need a RIA, not just extensions.
EH/LP25/2	Development in Centres	p.93 Paragraph 7.1.13	Amend in paragraph 7.1.13 under Mortlake to read: provide improved functional and physical links to East Sheen centre ...	Further to discussions in Hearing Session 6, to clarify the reference to the links set out in the Mortlake Village Plan Guidance SPD.
EH/LP25/3	Development in	p.91	In table in paragraph 7.1.7	To update the vision and

Change Ref.	Policy Section or heading	Page /Paragraph	Proposed change	Reason for the change			
	Centres	paragraph 7.1.7 Table	<p>Under “Teddington”</p> <p>Delete the last bullet point beginning “Village Planning SPD is being developed...” and replace with:</p> <ul style="list-style-type: none"> • The Hampton Wick and Teddington Village Planning Guidance SPD was adopted in June 2017. It sets out the vision for Teddington, including that it will: <ul style="list-style-type: none"> ○ continue to be a welcoming community for residents, visitors and businesses; ○ provide a wide range of independent and other shops, employment, leisure, cultural, health and social facilities and support a range of community activities; ○ manage access, traffic and parking so that the role of the centre and needs of the community are supported; and ○ ensure that residential areas will continue to enjoy and use amenities such as Teddington’s open spaces, the historic Royal Parks and the River Thames. 	<p>approach for Teddington main centre following the adoption of the “Hampton Wick and Teddington Village Planning Guidance SPD” in 2017.</p>			
EH/LP25/4	Development in Centres	p.93 paragraph 7.1.13 Table	<p>In Table 7.1.13, insert new row under Barnes, and add the following text:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">Hampton</td> <td style="width: 25%;">Hampton Village Hampton Nursery Lands</td> <td style="width: 60%;"> <ul style="list-style-type: none"> • bring together the different areas of Hampton as a vibrant, caring community with facilities to meet local needs; • provide a more diverse range of shopping; • improve highway conditions, street furniture and signage in Hampton Village; • retain and improve the quality of shopfronts and advertisements; and • maintain and enhance the small parades of shops in Priory </td> </tr> </table>	Hampton	Hampton Village Hampton Nursery Lands	<ul style="list-style-type: none"> • bring together the different areas of Hampton as a vibrant, caring community with facilities to meet local needs; • provide a more diverse range of shopping; • improve highway conditions, street furniture and signage in Hampton Village; • retain and improve the quality of shopfronts and advertisements; and • maintain and enhance the small parades of shops in Priory 	<p>To update the vision and approach for Hampton following the adoption of the “Hampton Village Planning Guidance SPD” in 2017.</p>
Hampton	Hampton Village Hampton Nursery Lands	<ul style="list-style-type: none"> • bring together the different areas of Hampton as a vibrant, caring community with facilities to meet local needs; • provide a more diverse range of shopping; • improve highway conditions, street furniture and signage in Hampton Village; • retain and improve the quality of shopfronts and advertisements; and • maintain and enhance the small parades of shops in Priory 					

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					Road.				
EH/LP25/5	Development in Centres	p.93 paragraph 7.1.13 Table	<p>In Table 7.1.13, insert new row under Hampton Village (see above), and add the following text:</p> <table border="1"> <tr> <td>Hampton Hill</td> <td>Hampton Hill</td> <td> <ul style="list-style-type: none"> • continue to be a thriving local centre with a range of shops and community facilities to meet local needs through a good balance of independent shops (as well as multiples) supported by sufficient convenient car parking; • improve the appearance of buildings, particularly shopfronts, and the public realm; • if possible reduce the impact of through traffic, enhance facilities for pedestrians and cyclists and manage parking; • retain and improve the quality of shopfronts and advertisements; and • improve highway conditions, signage and street furniture in the High Street. </td> </tr> </table>			Hampton Hill	Hampton Hill	<ul style="list-style-type: none"> • continue to be a thriving local centre with a range of shops and community facilities to meet local needs through a good balance of independent shops (as well as multiples) supported by sufficient convenient car parking; • improve the appearance of buildings, particularly shopfronts, and the public realm; • if possible reduce the impact of through traffic, enhance facilities for pedestrians and cyclists and manage parking; • retain and improve the quality of shopfronts and advertisements; and • improve highway conditions, signage and street furniture in the High Street. 	To update the vision and approach for Hampton Hill following the adoption of the “Hampton Hill Village Planning Guidance SPD” in 2017.
Hampton Hill	Hampton Hill	<ul style="list-style-type: none"> • continue to be a thriving local centre with a range of shops and community facilities to meet local needs through a good balance of independent shops (as well as multiples) supported by sufficient convenient car parking; • improve the appearance of buildings, particularly shopfronts, and the public realm; • if possible reduce the impact of through traffic, enhance facilities for pedestrians and cyclists and manage parking; • retain and improve the quality of shopfronts and advertisements; and • improve highway conditions, signage and street furniture in the High Street. 							
EH/LP25/6	Development in Centres	p.93 paragraph 7.1.13 Table	<p>In Table 7.1.13, insert new row above Kew, and add the following text:</p> <table border="1"> <tr> <td>Hampton Wick and Teddington</td> <td>Hampton Wick neighbourhood centre</td> <td> <ul style="list-style-type: none"> • retain Hampton Wick’s sense of identity and ensure its centre thrives with a mix of retail and other facilities; </td> </tr> </table>			Hampton Wick and Teddington	Hampton Wick neighbourhood centre	<ul style="list-style-type: none"> • retain Hampton Wick’s sense of identity and ensure its centre thrives with a mix of retail and other facilities; 	To update the vision and approach for Hampton Wick and Teddington following the adoption of the “Hampton Wick and Teddington Village Planning Guidance SPD” in 2017.
Hampton Wick and Teddington	Hampton Wick neighbourhood centre	<ul style="list-style-type: none"> • retain Hampton Wick’s sense of identity and ensure its centre thrives with a mix of retail and other facilities; 							

Change Ref.	Policy Section or heading	Page /Paragraph	Proposed change	Reason for the change
			<p>Kingston Road neighbourhood centre</p> <p>Stanley Road neighbourhood centre</p> <p>Waldegrave Road local parade</p> <ul style="list-style-type: none"> • maintain and enhance Hampton Wick’s residential areas, public realm, pedestrian routes and open spaces; • improve public transport in Hampton Wick, manage traffic and parking and reduce through traffic; and • protect and improve local shopping parades at Kingston Road, Stanley Road and Waldegrave Road, enabling them to provide shopping and other services to meet local needs. 	
PE/LP26/1	Shopping frontages	p.97 paragraph 7.2.8	<p>Add final sentence to para. 7.2.8</p> <p>“This policy primarily protects the ground floor. It does not apply to a separate unit located to the rear of a unit fronting the main shopping street. It is acknowledged that there may be scope to convert floorspace (including ancillary space) to other uses, provided that the commercial or community use on the ground floor remains of a viable size and that this does not lead to an unacceptable loss of commercial or community space on upper floors. For retail premises, sufficient ancillary space should be retained.”</p>	For clarity
PE/LP27/1	Public Houses	p.100 paragraph 7.3.6	<p>In para 7.3.6:</p> <p>In first sentence delete “and not the A4 use class in its entirety” and replace with “including the hybrid A3/A4 use (public house with expanded food provision) introduced by amendment to the Use Classes Order in May 2017 (SI 619), and not wine bars. The criteria of policy LP 28 in 8.1 'Social and Community Infrastructure' will be applied when</p>	To reflect changes in the Use Classes Order (2017)

Change Ref.	Policy Section or heading	Page /Paragraph	Proposed change	Reason for the change
			assessing the loss of a pub”	
EH/LP28/1	Social and Community Infrastructure	p.103 LP 28 Paragraph 8.1.2	This is not an exhaustive list and the Council will determine, as part of the pre-application process , whether any facility or service is considered to be a social infrastructure or community use. The pre-application process is encouraged and on specific schemes may clarify which policies and requirements apply.	Further to discussions in Hearing 2, to clarify that the pre-application process is optional.
EH/LP28/2	Social and Community Infrastructure	p.105 LP 28 Paragraph 8.1.13	Add to paragraph 8.1.13 new sentence (after second sentence): ... For applications for 10 or more residential units, this should be addressed in a Supporting Planning Statement and a Health Impact Assessment, as required (in accordance with the Local Validation Checklist) and/or through an Environmental Impact Assessment (EIA) for projects above the threshold. ...	Further to discussions in Hearing 2, to clarify this assessment can be made within the standard supporting documents to a planning application; there is no requirement for a separate assessment.
EH/LP28/3	Social and Community Infrastructure	p. 104	Add a new paragraph after 8.1.8 to read: The Council’s Indoor Sports Facility Needs Assessment highlights the need for new facilities within the borough. Where possible and feasible, such provision should be provided on-site in line with the Council’s Indoor Sports Facility Needs Assessment. Add a new paragraph after 8.1.10 to read: Proposals that could result in the loss of an existing indoor sport facility will also be assessed against the Council’s Indoor Sports Facility Needs Assessment and the criteria as set out in the NPPF. Early engagement with Sport England is encouraged where a proposal affects an existing indoor sport facility.	Further to discussions in Hearing 2, suggested to address Sport England’s comments to deal specifically with new indoor sports facilities and the Needs Assessment, and specifically with the potential loss of such facilities.
EH/LP28 and LP30/1	Social and Community Infrastructure and Health and Wellbeing	p.104 LP 28 Paragraph 8.1.10	Amend paragraph 8.1.10 point (1): ... Where the application relates to the loss of a health facility, the requirements of LP 30 will also need to be addressed and written agreement from the Richmond Clinical Commissioning Group, NHS England or other relevant health body must be provided...	Further to discussions in Hearing 2, to signpost clearly that Policies LP28 and LP30 will be considered for proposals involving the loss of any health

		p.111 LP 30 Paragraph 8.3.17	Add to end of paragraph 8.3.17 to read: Applications for new or loss of health and social care facilities will be considered in line with the criteria of policy LP 28 in 8.1 'Social and Community Infrastructure' <u>and paragraph 8.1.10 sets out that written agreement of the relevant health body must be provided to assess the loss of any existing health facilities.</u>	facilities.
PE/LP29/1	Education and Training	p.107 paragraph: 8.2.9	Include an additional sentence at end of paragraph 8.2.9 to read: <u>"Access by public transport should be a consideration in reducing traffic impacts when identifying locations for new educational facilities."</u>	To reflect regional guidance & reduce traffic impacts, as agreed in Statement of Common Ground with Transport for London / GLA on behalf of the Mayor of London (8 September 2017) (LBR-LP-010).
PE/LP29/2	Meeting educational needs and delivery of new schools	p.107 paragraph 8.2.11	Make an addition after "Richmond" to read: "Adequately sized sites for new schools within the areas of the borough where additional places are needed are extremely rare. The following sites are identified for educational uses as part of this Local Plan: • Richmond <u>upon Thames</u> College: provision of a new 5-form entry secondary school, a new special needs school and replacement college..."	A minor change is proposed to ensure it is clear that "Richmond College" refers to Richmond <u>upon Thames</u> College. This reference will be updated in all other areas of the Plan, including paras 3.1.39, 3.1.41, 5.7.4, 8.2.11 and 13.1.7.
EH/LP29/3	Education and Training – Local Employment Agreements	p.107 LP 29 Paragraph 8.2.14	Add after first sentence: ... <u>Securing the skills to support residents into sustainable employment is a key priority for the Council to support the local economy, to raise the bar further for those with higher levels of skills than London averages and make sure some residents with lower skills are not missing out economically.</u> ...	Further to discussions in Hearing 2, to clarify the requirement for LEAs is considered necessary, directly related, and fairly related in scale and kind to the development. A LEA provides the means to manage the development related job opportunities arising from the

				<p>proposal, and will cover how the applicant will work with the Council in order to maximise employment and training opportunities for local people and businesses.</p> <p>Examples of previous agreements within Richmond: - 12/3650/FUL Twickenham Sorting Office. Legal Agreement secured a LEA - (page 33 in the PDF) - 16/2777/FUL Ryde House, Twickenham. Legal Agreement secured for Employment and Skills Plan (about to be uploaded to website).</p>
EH/LP29/4	Education and Training – Local Employment Agreements	p.107 LP 29 Paragraph 8.2.15	<p>Add to end of paragraph 8.2.15: ... Such an agreement can make use of existing schemes, such as Way2Work, Construction Training Initiative, schemes run by Registered Providers and developers, provided these manage the development related job opportunities. The details of the LEA will be subject to negotiation, tailored to site specific circumstances and proportionate to the scale of development proposed, and require developers to use reasonable endeavours to incorporate in their relevant contracts. The contents are expected to cover:</p> <ul style="list-style-type: none"> • Forecasting of job opportunities • Notification of job vacancies • Local labour target • Jobs brokerage and skills training • Apprenticeships and work experience • Use of local suppliers 	<p>Further to discussions in Hearing 2, to guide the practicalities for implementation of the requirement for LEAs, ahead of further SPG guidance.</p> <p>Further SPD guidance will, amongst other areas, clarify the thresholds to aid implementation, such as: Retail, leisure or office dev. (1,000 m² +) Industrial dev. (2,000 m² +) Warehouse dev. (4,000 m² +)</p>

			<ul style="list-style-type: none"> <u>Delivery of specific LEA targets.</u> <u>A developer can set out justification as to why it may not be possible to deliver any of the requirements highlighted. Further guidance to assist implementation will be provided in a forthcoming SPD.</u> 	Mixed use dev. (1,000 m ² +)
PE/LP30/1	Health and Wellbeing	p.108 Policy LP30	add new point 7. within main policy section A under point 6. to read as follows: " <u>7. Active Design which encourages wellbeing and greater physical movement as part of everyday routines.</u> "	To be consistent with the health and wellbeing objectives of the NPPF
PE/LP30/2	Health and Wellbeing	p.108 paragraph: 8.3.2	Include extra text in 3 rd sentence, so whole paragraph reads : "The environment in which we live is a key determinant in people's health and wellbeing. The planning system plays an important role in influencing the built and natural environment and therefore plays a key role in the physical and mental wellbeing of the population. A healthy environment can promote <u>wellbeing and</u> healthy lifestyles for all and can contribute to a reduction in health inequalities."	To add clarity
PE/LP31/1	Public Open Space, Play Space, Sport and Recreation	p. 111 Policy LP31	Amend first sentence of Part B as follows: "B. The Council will require all major development proposals in the borough to meet the Public Open Space, and play space, <u>and playing fields and ancillary sport facilities</u> needs arising out of the development by requiring the following:"	To ensure the needs as set out in the borough's Playing Pitch Strategy are addressed as agreed in Statement of Common Ground with Sport England (21 September 2017) (LBR-LP-024).
PE/LP31/2	Public Open Space, Play Space, Sport and Recreation	p. 111 Policy LP31	Add new criterion 3 of Part B as follows: <u>"3. Playing fields and sport facilities: Applicants should assess the need and feasibility for on-site provision of new playing fields and ancillary sport facilities in line with the borough's Playing Pitch Strategy."</u>	To ensure the needs as set out in the borough's Playing Pitch Strategy are addressed as agreed in Statement of Common Ground with Sport England (21 September 2017) (LBR-LP-024).
PE/LP/31/3	Public Open Space, Play Space, Sport and Recreation	p. 111 Policy LP31	Amend criterion 3 of Part B as follows: 3-4. Where on-site provision of Public Open Space, or play space <u>or new playing fields and ancillary facilities</u> is not feasible or practicable, the Council will expect existing surrounding facilities and spaces to be improved and made more accessible to the users and occupiers of the	To ensure the needs as set out in the borough's Playing Pitch Strategy are addressed as agreed in Statement of Common Ground with Sport

			new development through, for example, improved walking and cycling links or enhancements of play space or existing playing fields and associated sport facilities. Financial contributions will be required to either fund off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development.”	England (21 September 2017) (LBR-LP-024).
EH/LP34/1	New Housing	p.118 LP 34 Paragraph 9.1.4	This is reflected in the broad expected pattern of future housing land supply set out in the policy LP34.B which sets out indicative ranges for the broad areas and are not to be regarded as any lower or upper limit, as the overall target is to be exceeded.	Further to discussions in Hearing 3, to clarify that the approx. no. of units set out for the broad areas in LP34.B does not set any upper limit.
EH/LP35/1	Housing Mix and Standards	p.119 LP 35 Paragraph 9.2.2	Amend the last sentence in Part A to read: ... The housing mix should be appropriate to the site-specifics of the location. Amend the last sentence in paragraph 9.2.2 to read: ... To accord with LP35.A t he appropriate mix should be considered on a site by site basis having regard to...	Further to discussions in Hearing 3, to clarify the assessment of housing mix is considered on a site by site basis, and signpost this sentence in the supporting text which provides clarification on the assessment of mix to the location.
EH/LP35/2	Housing Mix and Standards	p.121 Paragraph 9.2.10	Amend paragraph 9.2.10 to read: ... (in accordance with policy LP 8 in 4.8 ‘Amenity and Living Conditions’ which also considers the impact on existing occupants) ...	Further to discussions in Hearing Session 3, to emphasise the different purposes of assessments under LP35 and LP8 regarding balconies and terraces, and the flexibility for a case by case assessment as set out in paragraphs 9.2.10 and 9.2.11.
EH/LP36/1	Affordable Housing	p.121 LP 36	Amend Part A.a to read: a. 50% of all housing units will be affordable housing, with this 50% will comprise a tenure mix of 40% of the affordable housing for rent and 10% of the affordable intermediate housing.	Further to discussions in Hearing Session 2, to provide clarity to LP36 A.a additional wording to specify the

				application of the tenure split.
EH/LP36/2	Affordable Housing	p.123 LP 36 Paragraph 9.3.3	Amend after second sentence to read: ... There is a national definition of affordable housing (see Glossary) and the Council will consider different products, such as for intermediate rent or low-cost home ownership, to ensure delivery at a local level is affordable and relevant to the housing needs in the borough. The Council's Tenancy Strategy and Intermediate Housing Policy Statement set out guidance which should inform the provision of a range of affordable housing. ...	Further to discussions in Hearing Session 2, additional sentence added to paragraph 9.3.3 to refer to the Glossary definition in the Plan of affordable housing (as set out in the NPPF) and the Richmond context for consideration of local needs and affordability, while retaining flexibility in the Plan period to allow for consideration of a range of new products as they come forward from the GLA, RPs or other delivery partners.
EH/LP36/3	Affordable Housing	p.123 LP 36 Paragraph 9.3.2	Amend Part B to read: B. A contribution towards affordable housing will be expected on all housing sites. The following requirements apply: a. on all former employment sites at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved. b. _____ on all other sites capable of ten or more units gross and all former employment sites, at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved. b.c. _____ on sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out below and in the Affordable Housing SPD. Amend fourth sentence in paragraph 9.3.2 to read: A flowchart to follow setting out the policy requirements and t The	Further to discussions in Hearing Session 2, clarification to provide distinction in BP36.B.a the exact percentage sites are expected to deliver and requirements for on-site provision, along with a reference to the flowchart in the Affordable Housing SPD at paragraph 9.3.2.

			mechanism for assessing the contributions from individual sites, is set out in the Affordable Housing SPD	
EH/LP36/4	Affordable Housing	p.122 LP 36	Amend Part C to read: C. In accordance with A and B , the Council will seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. Amend Part D to read: D. Where a reduction to an affordable housing contribution is sought from the requirements in A and B on economic viability grounds	Further to discussions in Hearing Session 2, clarification added that C is offering additional guidance to assist in the implementation of Parts A and B and does not set any different policy requirement, and when D would apply. This is in accordance with London Plan Policy 3.12.
EH/LP36/5	Affordable Housing	p.124 LP 36	New paragraph after 9.3.12: The Mayor's Affordable Housing and Viability Supplementary Planning Guidance (2017), which provides useful guidance alongside the Local Plan, particularly in respect of viability considerations, will need to be applied for all schemes providing 10 or more homes.	Further to discussions in Hearing Session 2, added reference to the Mayor's Affordable Housing and Viability SPG.
PE/LP37/1	Housing Needs of Different Groups	p.126 paragraph 9.4.7	Add new paragraph following 9.4.7: "The Market Position Statement 2015-16 sets out the current and potential future demand and supply for adult social care services and outlines the investment that the Council and its partners have made in local services, to inform evidence based commissioning."	To add the Market Position Statement to update the supporting text
EH/LP39/1	Infill, Backland and Backgarden Development	p.129 LP 39	Amend Part A criteria (10) to read: 10. Result in no unacceptable adverse impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking. Amend Part B third sentence to read: In exceptional cases where it is considered that a limited scale of backgarden development may be considered acceptable it should not have a significantly adverse impact upon if it complies with the factors set out in A above. Development on backgarden sites must be more intimate in scale and lower than frontage properties.	Further to discussions in Hearing Session 3, to clarify how Part B is applied on backgarden developments (along with Part A) and the potential impacts assessed.

EH/LP40/1	Employment and local economy	p.132 LP 40	Rewording of criterion 4 to read as follows: 4. <u>In exceptional circumstances</u> , M mixed use development proposals <u>which come forward for specific employment sites</u> should retain, and where possible enhance, the level of existing employment floorspace. The inclusion of residential use within mixed use schemes will not be appropriate where it would be incompatible with, <u>or adversely</u> impact on, the continued operation of other established employment uses within that site or on neighbouring sites.	Further to discussions in Hearing Session 6, the Council considers that criterion 4 should be retained, with further clarity to explain that this relates to specific employment sites where under exceptional circumstances mixed use development may be required for viability purposes.
EH/LP41/1	Offices	p.133 LP 41	Amend 2b of Part A to read as follows: 2b) Mixed use including other employment generating or community uses. Such sites should <u>and residential which</u> maximises the amount of affordable housing provided as part of the mix;	Further to discussions in Hearing Session 6, to clarify the implementation in relation to mixed use development.
EH/LP41/2	Offices	p.134 LP 41	Amend criterion 5 of Part D to read as follows: 5. The Council will require the provision of affordable office space within all major developments with over 1000sqm of office space; this will be secured through Planning Obligations in line with the Planning Obligations SPD.	Further to discussions in Hearing Session 6.
EH/LP41/3	Offices	p.135 paragraph 10.2.6	Add a first sentence and amend the supporting text at paragraph 10.2.6 to read as follows: “ <u>The types of office buildings most at risk from conversion have relatively small floorplates.</u> In order to maximise the choice of resources and maintain a stock of cheaper accommodation <u>lower cost office stock to provide cheaper accommodation to the borough’s high percentage of Small and Medium Enterprises (SMEs),</u> the Council seeks to discourage the unnecessary redevelopment of <u>these</u> premises. “	Further to discussions in Hearing Session 6, to provide further clarity on low cost office space.
EH/LP41/4	Offices	p.136 paragraph 10.2.12	Amend from penultimate sentence of paragraph 10.2.12 onwards to read as follows: “... Affordable workspace is considered to have a rent and service charge of less than 80% of comparable <u>local</u> market rates. <u>It is acknowledged that market rates will vary according to a range of factors such as</u>	Further to discussions in Hearing Session 6, to provide further clarity on affordable workspace.

			<p><u>location within the borough, the quality and type of office stock.</u> Affordable office provision, including appropriate rental values, will be agreed and secured through Planning Obligations in line with the Council's Planning Obligations SPD. <u>A revised Planning Obligations SPD will contain guidance to assist in the implementation of policy requirements on affordable employment space, including guidance on design and financial arrangements.</u></p>	<p>Note for Inspector: The Council is cautious with regard to the inclusion of values taken from marketing in the supporting text, because prices fluctuate and figures will soon become out of date. The Revised Planning Obligations SPD will include further clarification as to how market rates are established for a particular site.</p>
EH/LP42/1	Industrial Land and Business Parks	p.137 LP 42	<p>Amend Part A criterion 2b to read: 2b) Mixed use including other employment generating or community uses, <u>and residential providing it does not adversely impact on the other uses and maximises the amount of affordable housing delivered as part of the mix.</u></p>	<p>Further to discussions in Hearing Session 6, to clarify the implementation in relation to mixed use development.</p>
EH/LP42/2	Industrial Land and Business Parks	p.138 new paragraph after 10.3.5	<p>Add after paragraph 10.3.5 a new paragraph as follows: <u>In the borough context it is common for employment, particularly industrial sites to be within established mixed use or residential areas, because of historic development patterns. This does not provide justification for a change of use, as mitigation can address impacts and constraints such as narrow access, which have been managed by existing occupiers, and therefore do not prevent any future or continued employment use.</u></p>	<p>Further to discussions in Hearing Session 6, to clarify that in light of the Council's robust evidence and the need to retain existing employment floorspace, constraints such as restricted access or the proximity to residential uses are not considered a reason for an exemption to policy requirements set out in LP 42.</p>
EH/LP42/3	Industrial Land and Business Parks	p. 138 LP 42	<p>Change wording in Part B criterion c to read: c. proposals for non-industrial uses will be resisted where the introduction of such uses would have an adverse impact on the continued operation of the existing services <u>adversely impact on</u></p>	<p>Further to discussions in Hearing Session 6, to clarify the implementation in relation to mixed use development.</p>

			industrial activities.	
EH/LP42/4	Industrial Land and Business Parks	p. 138 LP 42	Amend Part C to read: New Industrial space C. Development of appropriate scale industrial uses, and improvement and expansion of such premises, is encouraged. New industrial space should be flexible and adaptable for different types of uses activities and suitable to meet future needs, especially to provide for the requirements of local businesses.	For clarity
PE/LP44/1	Sustainable Travel choices	P.146 Taxis and private hire vehicles Paragraph: 11.1.16	Add text to first sentence to read thus: Taxi ranks should be conveniently located close to the venue they serve and accessible for all with adequate space for customers to queue."	To add clarity and to reflect the Mayor of London's aspirations, as agreed in Statement of Common Ground with Transport for London / GLA on behalf of the Mayor of London (8 September 2017) (LBR-LP-010).
EH/LP45/1	Parking Standards and Servicing	p. 147 Paragraph 11.2.3	Modifications to paragraph 11.2.3: 11.2.3 Developers may only provide fewer parking spaces, including car free schemes, if they can show demonstrate as part of a Transport Statement or Transport Assessment with supporting survey information and technical assessment that there would be no unacceptable adverse impact on on-street parking availability , amenity, street scene, road safety or emergency access in the vicinity surrounding area, as a result of the generation of unacceptable overspill of on-street parking in the vicinity. In general it is expected that in PTAL areas of 0-3 1-4 the standards should be met, but in In PTAL areas of 5-4-6, such as Richmond and Twickenham centres, parking provision at a level lower than the standard or a car-free development, supported for example by a car club, may be appropriate where this can be demonstrated as acceptable, taking	Further to discussions in Hearing Session 7, to clarify how the flexibility in the parking standards is being applied.

			<u>account of local characteristics, availability of sustainable modes of travel and public transport provision, and availability of on-street parking spaces in exceptional circumstances.</u>	
EH/LP45/2	Parking Standards and Servicing	p. 147 Paragraph 11.2.2	Amend last paragraph of 11.2.2 as follows: 11.2.2 This restriction would be secured by a Planning Obligation <u>excluding the address from the schedule of streets in the relevant road traffic order that created or creates the Controlled Parking Zone in which the property is situated, by restricting under section 106 of the Town and Country Planning Act 1990 the disposal of an interest in relevant properties unless a person disposing advises the person acquiring of the non-availability of residents or business on-street parking permits and/or through Section 16 of the Greater London Council (General Powers) Act 1974 (or any statute revoking or re-enacting that Act).</u>	Further to discussions in Hearing Session 7, to clarify the legal mechanisms for securing a limitation of parking permits.
EH/SA/1	Site Allocations	p.153 - 191 Final Bullet point for SA 1-14, 18-21, 24-28	Replace final bullet point for all listed site allocations to read: <u>“Design objectives and general Detailed guidance on design and relating to the local character of the area, which for any redevelopment proposal should have regard to,</u> is/will (also) (be) set out in the Village Planning Guidance SPD for XXX.” (Where XXX is the relevant Village Plan area.) (Please note: there is some minor variance in the specific amendment required depending on the existing text. This is clearly set out in LBR-LP-023.)	Further to discussions in Hearing 4, to clarify references to Village Planning Guidance SPDs and the guidance they provide.
PE/SA2/1	Site Allocations	p.154 SA 2 Platts Eyot, Hampton	Re-word bullet point 2 to read: <u>“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</u>	For greater clarity, as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).

			the wider character of the island, are improved and enhanced. A number of listed boathouses on the island are on the Heritage at Risk Register. There is a need to ensure that properties on the Heritage at Risk Register as well as the five Listed Buildings, together with the Platts Eyot Conservation Area and the wider character of the island, are improved and enhanced.	
PE/SA3/1	Site Allocations	p.156 SA 3 Hampton Traffic Unit	Add a sentence to the end of 3rd bullet point that states: <u>"It is recognised that a planning application for 28 residential units has been granted permission."</u>	For clarification.
EH/SA3/2	Site Allocations	p.156 SA 3 Hampton Traffic Unit	Amend third bullet to read: The site was declared surplus to requirements by the Metropolitan Police in 2015 <u>and is now in private ownership.</u>	Further to discussions in Hearing Session 4, to clarify the Council's expectation for housing delivery on this site.
PE/SA5/1	Site Allocations	p.158 SA 5 Teddington Telephone Exchange	Add text to bullet point 7 to read: "The site is within the High Street Teddington Conservation Area, and any redevelopment proposal will need to respect <u>its character and</u> the settings of the listed buildings on the opposite side of the High Street."	To preserve the Conservation Area and protect the settings of the listed buildings, as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
PE/SA7/1	Site Allocations	p.161 SA 7 Strathmore Centre	Include text in bullet point 5 with regard to the provision of outdoor space and parking to read as follows: "Proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way, <u>including the provision of appropriate outside space and parking related to the childcare services</u> , or elsewhere in a convenient alternative location accessible to the current community it supports."	For greater clarity
PE/SA 8/1	Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	At the beginning of the 2 nd paragraph of Policy SA 8 add "and/or" to the 1 st sentence: "A Masterplan <u>and / or</u> site development brief, ..."	To provide greater clarity, as agreed in Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).

PE/SA 8/2	Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Delete " very " from the 4 th bullet point: "It is acknowledged that this is a very constrained site, with the majority of the land not built on designated as Metropolitan Open Land."	To provide clarity, as agreed in Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).
PE/SA 8/3	Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Delete the last sentence of bullet point 4 as follows: "There are also Listed Buildings, Buildings of Townscape Merit as well as sports playing fields."	For clarity as the 4th bullet point seeks to address issues and constraints in relation to MOL, whereas the 5th bullet point is in relation to heritage assets, as agreed in Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).
PE/SA 8/4	Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Insert at beginning of 5 th bullet point: " <u>There are also Listed Buildings, Buildings of Townscape Merit as well as sports playing fields.</u> "	For clarity as the 4th bullet point seeks to address issues and constraints in relation to MOL, whereas the 5th bullet point is in relation to heritage assets, as agreed in Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).
PE/SA 8/6	Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Amend bullet point 5 (in addition to change PE/SA8/4 above) to stress the significance of the heritage assets to read: "Any development proposal has <u>to take account of the highly significant heritage assets</u> and respect the special and unique location and setting of St Mary's University, <u>including the Grade I Listed Chapel</u> , the adjoining Grade I Listed Building (Strawberry Hill House) and the associated Historic Park and Garden (<u>II*</u>) as well as ..."	To further emphasise the sensitivity of the site as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).

PE/SA 8/7	Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Insert new bullet point within the supporting text (after the 5th bullet point) as follows: <u>"The existing playing fields and sports facilities should be retained and/or re-provided, and if necessary, replacement facilities will have to be provided on or off site."</u>	For clarification as agreed in Statement of Common Ground with Sport England (21 September 2017) (LBR-LP-024).
PE/SA 8/8	Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Amend the 6 th bullet point: "The Council will work with the University on a Masterplan <u>and / or</u> site <u>development</u> brief (SPD) for the longer term upgrading of their sites, ..."	To provide greater clarity as agreed in Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).
PE/SA 8/9	Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Amend the 7 th bullet point: "Detailed guidance on design and local character for any redevelopment proposal will also be set out within the site brief (SPD) as well as in the relevant Village Planning Guidance SPD, <u>and where relevant within the Masterplan / site development brief.</u> "	To provide greater clarity as agreed in Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).
EH/SA 8/10	Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Amend the 1st paragraph of Policy SA 8 to read: Retention and upgrading of St Mary's University and its associated teaching, sport and student residential accommodation. Upgrade works to include refurbishment, adaptation, <u>intensification</u> , extensions and new build elements on site where appropriate <u>justified fully with regard to national policy and the policies of the development plan.</u>	Further to discussions in Hearing Session 4 and to the Inspector's note (ID-009). The use of the word 'justified' is considered to be a more suitable reference point for the need to demonstrate very special circumstances against the development plan and national policy in the event a planning application arose to be determined that affected Metropolitan Open Land and which was otherwise 'inappropriate development' by

				definition. The modification has been agreed by the Council and the GLA on behalf of the Mayor of London.
PE/SA 9/1	Site Allocations	p.164 SA 9 Richmond upon Thames College, Twickenham	Amend the policy text to read: "Redevelopment to provide a new replacement college, science / technology / engineering / maths centre, technical hub (B1), a new secondary school and special education needs school, sports centre as well as residential including affordable housing. Protection and Upgrading of the playing field to the south of the college, including the installation of a new artificial grass (3G) playing pitch."	To provide clarity regarding the need to protect and upgrade the playing field to the south as agreed in Statement of Common Ground with Sport England (21 September 2017) (LBR-LP-024).
PE/SA 11/1	Site Allocations	p.166 SA 11 Twickenham Stadium	Amend the last sentence of bullet point 4 as follows: "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."	For greater clarity.
EH/SA 12/1	Site Allocations	p.168 SA 12 Mereway Day Centre	Add new penultimate bullet point: <u>"Any development proposal is required to protect and, where possible, enhance the River Crane corridor."</u>	Further to discussions in Hearing Session 5, to reflect approach as in other Site Allocations adjacent to the River Crane corridor.
PE/SA 14/1	Site Allocations	P.170 SA 14 Kneller Hall	Delete the existing bullet point 2: "The site is subject to being declared surplus to requirements by the Defence Infrastructure Organisation." And replace with the following wording: <u>"Defence Minister Mark Lancaster announced the release of Kneller Hall on 18 January 2016. This was confirmed in the document 'A Better Defence Estate', Nov 2016, where it was stated that there was an</u>	To recognise that the updated position with regard to the availability of the site as agreed in Statement of Common Ground with Defence Infrastructure Organisation (25 September 2017) (LBR-LP-025).

			intention to release Kneller Hall for disposal in 2020.	
PE/SA 14/2	Site Allocations	P.170 SA 14 Kneller Hall	Amend bullet point 6 as follows: “It is expected that the existing playing field will be retained and where possible upgraded, such as with ancillary facilities, including changing provided to support the use of the playing fields , provided that any existing ecological benefits and the openness and character of the Metropolitan Open Land is retained and, where possible enhanced.”	For clarity and to address Sport England’s comments in relation to ancillary facilities as agreed in Statement of Common Ground with Sport England (21 September 2017) (LBR-LP-024).
PE/SA 14/3	Site Allocations	P.170 SA 14 Kneller Hall	Amend the last sentence of bullet point 7 to read: “Any development should be sensitive to the significance of the historic building and respond positively to the setting of the Listed Building.”	To stress the significant heritage assets as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
EH/SA 14/4	Site Allocations	P.170 SA 14 Kneller Hall	Change to the first sentence of main policy text: “If the site is declared surplus to requirements, It has been announced that Kneller Hall will be released for disposal. Appropriate land uses include...”	Further to discussions in Hearing Session 4, to clarify status of disposal, as agreed with the Defence Infrastructure Organisation (3 October 2017).
PE/SA16/1	Site Allocations	p.174 SA 16 Cassel Hospital	Amend to read : “If the site and the Grade II listed Cassel Hospital be are declared surplus to requirements, social and community infrastructure uses are the most appropriate land uses for this site. Conversion or potential redevelopment for residential uses could be considered if it allows for the protection and restoration of the Listed Buildings.”	To correct a grammatical error.
PE/SA 16/2		p.174 SA 16 Cassel Hospital	Amend 7 th bullet point to read: “The restoration and conversion would need has to respect the significance of the heritage asset , protect and enhance the listed buildings, ensuring their sensitive repair and re-use , and the Ham Common Conservation Area and their settings. The settings of neighbouring listed buildings including the Grade II* listed properties, will also need to be considered as part of any development on this site.”	To emphasise the sensitivity of the site and heritage assets, as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
EH/SA 17/1	Site Allocations	p.176 SA 17 St	Proposed amendment to bullet point 1 of supporting text as follows: The site has been declared surplus to requirements by the Sisters of the	Further to discussions in Hearing Session 4, for clarity to

		Michael's Convent	Convent, <u>who have vacated the site in 2017.</u>	confirm that the Sisters of the Convent have left.
EH/SA 19/1	Site Allocations	p.178 SA 19 Richmond Station	Add to ninth bullet point: "The Council has produced and adopted a development brief for this site, which provides further guidance on the site's characteristics, constraints, land use and development opportunities. <u>The Council intends to update this SPD.</u> "	Further to discussions in Hearing Session 8, to clarify the Council intends to update the Richmond Station Site Brief.
PE/SA 22/1	Site Allocations	p.182 SA 22 Pools on the Park	Add a third sentence to the end of Policy SA 22 thus: <u>"Any proposal would need to be fully justified having assessed the significance of the building and its setting, and having taken into account the wider heritage designations that apply to the site."</u>	To give greater recognition to the heritage assets and MOL setting of the site, as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
PE/SA 23/1	Site Allocations	p.184 SA 23 Richmond Athletic Association Ground	Modify the 2 nd sentence of the policy so that Policy SA 23 reads: "The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional associated leisure facilities and other complementary uses could be incorporated provided they <u>have been fully justified as being necessary to support the continued sporting uses on the site, that they demonstrate</u> meeting identified needs, do not detract from the main use of the site as a sports ground, and <u>have been developed to</u> take into account of the Metropolitan Open Land (MOL) and historic designations."	For greater clarity
PE/SA24/1	Site Allocations	p.186 SA 24 Stag Brewery	In 7 th bullet point change text to read: "Incorporating a mix of uses, including social infrastructure and community as well as leisure, sport and health uses, and attractive frontages would <u>should</u> contribute to creating an inviting and vibrant new centre."	For greater clarity
PE/SA 24/2 see EH/SA 24/6	Site Allocations	p.186 SA 24: Stag	Amend the 10th bullet point of the supporting text as follows: "Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the	To avoid confusion and to add clarity. Also as agreed in Statement of Common Ground

below		Brewery	opportunity to integrate the development and new communities with the existing Mortlake community. <u>This includes the retention and/or re-provision and upgrading of the playing field within the site.</u>	with Sport England (21 September 2017) (LBR-LP-024)
EH/SA 24/3	Site Allocations	p.186 SA 24 Stag Brewery	Proposed modification as new additional bullet point – new 10 th bullet point (after the one referring to Mortlake Conservation Area): <u>“The site is very close to an Air Quality Focus Area. Therefore strict mitigation measures will be required, both to mitigate any effect on current receptors and highways and on future receptors within the proposed development, particularly for sensitive receptors, such as pupils at the secondary school.”</u>	Further to discussions at Hearing Session 8, to recognise that the air quality evidence has changed since the adoption of the site development brief in 2011.
EH/SA 24/4	Site Allocations	p.186 SA 24 Stag Brewery	Amend penultimate bullet point as follows: “There may be an opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site. The adopted <u>development brief (2011) identifies a number of transportation and highways issues.</u> The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where possible <u>necessary</u> improvements to <u>sustainable modes of travel, including</u> public transport facilities, can be <u>are</u> secured as part of any development proposal. <u>The opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site should be investigated as part of the comprehensive redevelopment.”</u>	Further to discussions at Hearing Session 8, to recognise existing constraints and strengthen the need for improvements to sustainable travel modes where necessary.
EH/SA 24/5	Site Allocations	p.186	Amend first bullet point as follows: “The Council has produced and adopted a development brief in 2011 for	Further to discussions at Hearing Session 8, to clarify that

		SA 24 Stag Brewery	this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities. <u>Any proposed development should have regard to the adopted brief.</u> "	any development scheme coming forward has to have regard to the adopted SPD.
EH/SA 24/6	Site Allocations	p.186 SA 24 Stag Brewery	Keep the original 10 th bullet point of the supporting text as existing and remove previous change PE/SA 24/2. Insert after the original 10 th bullet point the following: <u>The playing fields in the south west corner of the site, which are designated Other Open Land of Townscape Importance (OOLTI), should be retained and/or reprovided and upgraded. In the event of reprovision and upgrading, where a comprehensive approach to redevelopment can be taken in line with policy LP 14, it may be acceptable to re-distribute designated OOLTI within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness. In addition, reprovision and upgrading of the playing fields within the site for sport uses has to be carried out in line with policy LP 31, the NPPF and Sport England Policy.</u>	Further to discussions at Hearing Session 8, to set out the context for 'reprovision'.
EH/SA 24/7	Site Allocations	p.186 SA 24 Stag Brewery	Amend the original 9 th bullet point as follows: "The site is <u>within an Archaeological Priority Area and</u> partially within the Mortlake Conservation Area..."	Further to discussions at Hearing Session 8, for clarification.
PE/SA 28/1	Site Allocations	p.191 SA 28 Barnes Hospital	Modify the 2 nd sentence of policy SA 28 to read: "Any redevelopment proposal for this site will be required to prioritise the provision of a new <u>Special Education Needs 2-form-entry primary</u> school."	To reflect a change in educational need
PE/SA 28/2	Site Allocations	p.191 SA28 Barnes Hospital	In 3 rd bullet point change text to read: "There is a clear need for a new <u>Special Education Needs 2-form-entry primary</u> school in this area as set out in the <u>updated</u> Council's School	To reflect the change in educational need.

			Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to prioritise the provision of the educational use.”	
PE/I/1	Implementation	p.194 paragraph 13.1.7	Add wording in para. 13.1.7 to read: “A key challenge for this borough over the lifetime of this Plan will be the delivery of sufficient school places to meet the needs of the existing and growing population. Adequately sized sites for new schools within the borough are extremely rare. The Council will work with partners, including the Education Funding Agency as well as educational providers, to ensure the provision of the quantity and diversity of school places needed within the borough. The Local Plan identifies the following sites for educational uses: <ul style="list-style-type: none"> • Richmond upon Thames College, Twickenham: provision of a new 5-form entry secondary school, a new special needs school and replacement college...” 	A minor change is proposed to ensure it is clear that “Richmond College” refers to Richmond upon Thames College. This reference will be updated in all other areas of the Plan, including paras 3.1.39, 3.1.41, 5.7.4, 8.2.11 and 13.1.7.
EH/I/2	Implementation	p.199 13.5 Monitoring	Add new paragraph following 13.5.6: It is recognised that over the lifetime of the Plan, external circumstances will change. Whilst the Plan is overall considered to be flexible, the NPPF allows for Local Plans to be reviewed in whole or in part to respond flexibly to changing circumstances. Therefore, external factors such as changes in national policy, a London Plan review or changes in local evidence and need may trigger a review of this Local Plan. The programme for the preparation of Development Plan Documents is set out within the Council’s Local Development Scheme, which is regularly reviewed and updated.	Further to discussions in Hearing Sessions 1 and 3, to clarify review in the Plan triggers and review mechanisms.
EH/I/3	Implementation	p.197 Paragraph 13.3.5	Amend paragraph 13.3.5: ... It should be noted that Planning Obligation monies will not be secured for projects or items already on the Council’s Regulation 123 List, and will be subject to the pooling restrictions as set out in the CIL regulations.	Further to discussions in Hearing Session 7, to refer to the pooling restrictions for clarity.
PE/A5/1	Appendix 5 –	p.221	After section header “Pubs” delete the following:	To reflect amended Use Classes

	Marketing Requirements	paragraph 18.0.7	“(A4 use class)”. In second sentence of para 18.0.7 After “substantial reduction in” delete the following: “A4 floorspace...”	Order (2017)
EH/A5/2	Appendix 5 – Marketing Requirements	p.220 paragraph 18.0.2	Amend paragraph 18.0.2 in Appendix 5 to read: This appendix sets out the details that should be provided to enable officers to assess the acceptability or otherwise of the marketing undertaken. <u>The Council’s assessment will consider the overall length, type and quality of the marketing to come to a view, and if the applicant/agent puts forward any justification for any shortcomings in the marketing (e.g. the use of only one specialist website rather than a range of generic websites due to the nature of the existing employment use, or that a marketing board was not used because of advertisement controls) these will be considered, however the expectation is the below requirements should be fully addressed.</u>	Reason: Further to discussions in Hearing Session 6, to clarify the expectations of the Council’s marketing requirements.
PE/A7/1	Appendix 7 - Glossary	p.233 Industrial Land and Business Parks	Add to the list of Sui Generis uses classed as Employment Land within the Industrial Land and Business Parks definition in the Glossary. The final part to read as follows: “...as well as any other uses which fall within the B1 (c), B2, B8 Use Classes or are Sui Generis (such as vehicle repair garages, scrap yards, petrol filling stations, <u>builders' merchants</u>).”	To provide clarity
EH/A7/2	Appendix 7 - Glossary		Add to Glossary: <u>Inclusive design Design that creates an environment where everyone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers that create undue effort, separation or special treatment, and enables everyone regardless of disability, age, or gender to participate equally, confidently and independently in mainstream activities with choice and dignity.</u>	Further to discussions in Hearing 1, to clarify the Plan approach seeking inclusive communities and inclusive design. Add to Glossary definition of ‘Inclusive Design’ from the London Plan and the Mayor’s Accessible London: Achieving An Inclusive Environment SPG, to assist with the implementation of policies LP 1, LP 18, LP28, LP 30, LP 31

				and LP 44 in particular. This will, in conjunction with the existing Glossary definition of ‘Social Inclusion’, clarify the wider Plan’s aspiration for inclusiveness, and also assist with the implementation of policies LP 25 and LP 37.
EH/A7/3	Appendix 7 - Glossary		Add to Glossary: <u>Social infrastructure</u> <u>Covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people’s play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.</u>	Further to discussions in Hearing 2, additional guidance to assist implementation, reflecting the Mayor’s Social Infrastructure SPG and London Plan definition.
EH/A7/4	Appendix 7 - Glossary		Amend existing definition in Glossary as follows to clarify what constitutes Green Infrastructure: “Green Infrastructure The multi-functional, interdependent network of open and green spaces – and green features <u>such as street trees and green roofs</u> – including the Blue Ribbon Network, which is capable of delivering a wide range of environmental and quality of life benefits for local communities (people and wildlife), including flood management; urban cooling; improving physical and mental health; green transport links (walking and cycling routes); ecological connectivity; and food growing. Green and open spaces of all sizes can be part of green infrastructure provided they contribute to the functioning of the network as a whole.”	Further to discussions in Hearing Session 5, to clarify Green Infrastructure terminology for consistency.
EH/A7/5	Appendix 7 - Glossary		Amend the existing OOLTI definition in the glossary as follows: “Other Open Land of Townscape Importance (<u>OOLTI</u>) Open areas, which are not extensive enough to be defined as Metropolitan Open Land, but act as pockets of greenery of local significance, contribute to the local character, and are valued by residents as open spaces in the built up area. These areas can include	Further to discussions in Hearing Session 5, to clarify the distinction between OOLTI and LGS.

			<p>public and private sports grounds, some school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. <u>OOLTI is a local policy and new designations are made by the Council as part of the plan-making process. This is different to ‘Local Green Space’ (see definition above), which national policy makes provision for.”</u></p> <p>Add new definition to glossary for ‘Local Green Space’ as follows: <u>“Local Green Space (LGS)</u> <u>Local communities can identify green or open space which is of special quality and holds particular significance and value to the local community which it serves, in line with paragraphs 76 to 78 of the National Planning Policy Framework (NPPF). Local Green Spaces can only be designated when a local plan or neighbourhood plan is prepared or reviewed. National policy on Green Belt applies to any designated Local Green Space.”</u></p>	
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Schedule of proposed minor changes to the LB Richmond upon Thames Local Plan - Typos and minor errors

Text proposed to be inserted in **bold blue underlined**

Pre-Hearing Examination change = PE

Text proposed to be removed in ~~red strikethrough~~

EH = changes made during the Examination.

Change Ref.	Policy Section	Page /Paragraph	Proposed change	Reason for the change
PE/TE/1	Throughout the Plan	Op.cit.	Amend all existing references within the Local Plan to " shop fronts " into (one word) " <u>shopfronts</u> "	To ensure consistency.
PE/TE/2	Throughout the Plan	Op.cit.	Change the title of the "Proposal Map" to "Policies Map" and amend all existing references in the Plan from " Proposals Map" to " <u>Policies</u> Map"	For accuracy and consistency
PE/TE/3	Setting the Scene	p.4 paragraph 1.1.3	5 th line, remove comma and insert semi colon "..regard is to be had to the development plan , <u>;</u> the determination shall be made ..."	Punctuation correction
PE/TE/4	Detailed review of existing policies	p. 7 paragraph 1.4.2	Remove capitalisation in the 3 rd bullet point to read: " Detailed review of existing policies: T <u>t</u> his sets out the detailed analysis..."	To ensure consistency
PE/TE/5	Strategic Context, Vision and Objectives	p. 9 paragraph 2.1.4	Insert a comma after "vision" and delete the comma after "is" to read: "The overall vision , <u>,</u> as set out in the Community Plan is , <u>;</u> for a borough where:"	Punctuation correction
PE/TE/6	Village Planning	p.10 paragraph 2.1.12	3 rd sentence delete " s " after "provide"	Improve grammar
PE/TE/7	Meeting People's Needs	p.22 paragraph 3.1.26	2 nd sentence reword thus:	Spelling correction

			“Access to fast food takeways <u>takeaways</u> detracts from the ...”	
PE/TE/7a	Local Character and Design Quality	p.28 Policy LP 1	Part B amend third sentence to read: ...Blinds, canopies or shutters, where acceptable in principle, must be appropriate to the character of the shopfront and its <u>the</u> context within which it is located.	For clarity
PE/TE/8	Access and layout	P.30 Paragraph 4.1.8	2 nd line of first sentence, insert gap between “with“ and “the” to read: “...integrated with <u>the</u> <u>with the</u> existing area, street frontage and existing local routes.”	Typo
PE/TE/9	Archaeology	p.40 paragraph 4.7.2	However, regardless of their status, established procedures of consultation and evaluation as set out in national policy guidance and other advice must be followed in preparing development proposals. Prospective applicants should make an initial assessment of the archaeological potential and significance of a site by consultating <u>consulting</u> with the appropriate specialist bodies, Historic England and the Greater London Archaeological Advisory Service (GLAAS). GLAAS is the borough’s archaeological advisers and should be consulted with regard to archaeological matters.	Spelling correction
EH/TE/9a	Amenity and Living Conditions	p.41 Policy LP 8	Amend to read: 3. ensure balconies does not raise unacceptable overlooking or noise...	Typo
PE/TE/10	Construction and Demolition	p.47 paragraph 4.10.18	Delete: “ 4.10.18 ” at beginning of 1st sentence.	Duplication
PE/TE/11	Retail frontages	P.96 Policy LP26	In Secondary Shopping Frontages (B) after point 1.(c) delete “the” to read: “In addition to (a) and (b) above, the proposal must the meet the following criteria: 2. the proposed use”	To correct accidental repetition
PE/TE/12	New social and community	p.103 paragraph	Insert an italic in 6 th bullet point to read: “Government departments’ <u>Estates Strategies</u> ”	Correct an omission

	infrastructure	8.1.6		
PE/TE/12b	New social and community infrastructure	p.105 paragraph 8.1.13	Where necessary, measures will need to be put in place to mitigate against the impacts of development on existing services.	To correct a grammatical error
PE/TE/13	Meeting educational needs and delivery of new schools	p.107 paragraph 8.2.11	Delete/add word “of” Richmond College: provision of a new 5-form entry secondary school, a new special needs school and replacement college Stag Brewery, Mortlake: provision of a new 6-form ef entry secondary school, including sixth form Ryde House, East Twickenham: provision of a new 2-form ef entry primary school Barnes Hospital, Barnes: provision of 2-form ef entry primary school	To correct a typographical error.
PE/TE/14	New housing	p.119 paragraph 9.1.5	add word “do” in the final sentence: “In accordance with national guidance, Local Plans should provide land to meet those needs in full, insofar as their areas have the sustainable capacity to do so, as defined by other policies and having regard to constraints.”	To correct a typographical error.
PE/TE/15	Infill, Backland and Backgarden Development	p.129 paragraph 9.6 Policy LP 39	Part B. Backgarden Development , insert a space between “the” and “factors” in the 3 rd sentence to read: “In exceptional cases where it is considered that a limited scale of backgarden development may be acceptable it should not have a significantly adverse impact upon thefactors <u>the factors</u> set out above”	Typo
PE/TE/16	Employment and the Local Economy	P.133 Policy LP 41 Retention of offices	In point A, 2 nd line amend to read: “Any loss of office space (on sites outside ef the designated Key Office Areas) will only be permitted where:”	typo
PE/TE/17	Key Office Areas	p.135 paragraph 10.2.9	under “Twickenham”, fourth bullet point, delete words “Briar House” to read: “ Briar House , 5-11 Briar Road, Twickenham”	To clarify the address (correctly shown in the related map).

PE/TE/18	Visitor Economy	p. 141 paragraph 10.4.4	4 th line, 2 nd sentence insert a space between the words “to” and “residents”, to read “...to promote sustainable travel choices and minimise disruption to residents <u>to residents</u> and local businesses where possible.”	Typographic error
PE/TE/18a	Parking Standards and Servicing	LP 45 and throughout Local Plan	Amend all references to ‘on street’ parking with a dash in the middle, i.e. ‘on-street’ parking	For clarity
PE/TE/18b	Site Allocations	SA 28 Barnes Hospital, East Sheen	Add to sixth bullet: “The Council expects that the most important existing Buildings of Townscape <u>Merit</u> are retained. ...”	To correct a typographical error.
PE/TE/19	Appendix 4 List of key and Secondary Shopping Frontages	p.216 Richmond Main Centre	In the Key Frontage Column: Under “ Paved Court ” delete Nos. 1-17 (consecutive) insert “ <u>Nos. 2-16 (even)</u> ” and “ <u>Nos. 1-17 (odd)</u> ”	For clarity
PE/TE/20	Appendix 4 List of key and Secondary Shopping Frontages	p.216 Richmond Main Centre	In the Key Frontage Column: Under “Red Lion Street” delete “ Nos. 2-8 (even) ”. Replace with “ <u>Nos. 2-4 (even)</u> ” .	Typographical correction to align addresses with Proposals Map.
EH/TE/21	Glossary	Under “Third Generation (3G) playing pitch	Amend the definition as follows: A type of artificial grass pitch (AGP) known as 'third generation turf'. <u>With 3G turf, the pile (the artificial grass ‘blades’) is supported by an infill made of rubber crumb. Sports that can use 3G pitches include that can be used for football, and rugby and lacrosse, providing that certain specifications are met for each sport matches.</u>	To ensure the definition is up-to-date with recent specification requirements for different sport uses.