LONDON BOROUGH OF
RICHMOND UPON THAMES

Local Plan Direction of Travel Consultation
The best for our borough

Foreword

It is less than 2 years since the Council adopted the present Local Plan but much has happened since. In response to the accelerating pace of climate change the Council has adopted a Climate Emergency Strategy with a range of actions some of which have a direct bearing on Local Plan policies. There has also been a revision of the National Planning Policy Framework and a new London Plan is in its final stages before adoption with, amongst other things, increased housing targets albeit not at the unrealistic levels first mooted. Within those targets the achievement of the desired proportion of affordable accommodation remains elusive. Another major issue is that although our town centres have so far proved more resilient than most to changes in shopping habits we need to consider whether greater policy flexibility is desirable.

These and many other issues are set out in this Direction of Travel document. We are anxious to have the views upon it of our residents and those who work or study in the borough.

Councillor Martin Elengorn

Chair of the Environment, Sustainability, Culture and Sports Committee

Introduction

What is a Local Plan?

We are now starting to prepare a new Local Plan for Richmond borough. This consultation document sets out our initial thoughts about what the scope of the new Plan should be and the planning issues that should be addressed.

The Local Plan is the key planning document for the borough. It will set out policies and guidance to shape our places, plan and manage growth and guide development across the borough over a 15-year period. We will use the Local Plan to guide our decisions on the location, amount and type of development the borough needs to accommodate growth. It will also set out which places will be protected, and which places will change. Ultimately, the Local Plan[i] will be the main document against which we assess planning applications.

Why do we want to hear from you?

This Direction of Travel document is the first stage in our engagement process with residents, businesses and other stakeholders. We want to hear your views as to how the borough should accommodate growth and what our future strategic vision should be for the borough. The borough is facing a number of key challenges, opportunities and critical planning issues. This document sets out what we think they are, and how they could be included in a new Local Plan.

We want to know your views. Please tell us if you agree, or if we have missed any opportunities or issues you think need to be addressed in the new Local Plan.

Why do we need a new Local Plan?

Reason 1: In summer 2019, we declared a climate emergency[ii]. We are committed to taking robust action to tackle the local and global threat of climate change, both internally and in partnership with local organisations and residents[iii]. We want to minimise our environmental impact by cutting carbon emissions, waste and pollution. Our Climate Emergency Strategy sets out the actions and the approaches we will take in dealing with climate change, and the Air Quality Action Plan pledges us to be a leading borough in tackling pollution[iv]. This necessitates a new strategic vision for the future of the borough and a new place making strategy for how this will be achieved.

Reason 2: Our borough is changing and our population is growing. Like the rest of London, we face the challenge of accommodating new growth and development. We need to carefully plan for this growth to ensure the infrastructure is there to support our existing and new communities. Our ambition is to become a greener, safer and fairer borough[v]. We want to ensure better connectivity within the borough and encourage a change in the way people choose to move around the borough by focusing on walking and cycling. We want the borough's residents, workers and visitors to be able to travel more sustainably by improving travel choice and connecting communities to destinations, such as shops, health services and parks. We also need to respond to changes and trends, for example in

the way we shop and use our high streets, which will continue to develop further over the next 15 years.

Reason 3: The Mayor of London has produced a new London Plan, which is likely to be published in March 2020. Our Plan has to be in general conformity with the Mayor's London Plan. The Mayor's Plan seeks to prioritise building the homes, particularly the genuinely affordable homes, that Londoners need. The new London Plan will provide us with a new housing target which will be substantially higher than the current target. We need to be ready to show how new housing and other new requirements emerging from the London Plan can be delivered whilst maintaining the special character of the borough.

Reason 4: The Government is constantly changing planning policy, guidance and legislation. Since the adoption of our last Local Plan in 2018, significant changes have already been made by the Government. Further planning reforms are underway. We need to make sure that we can implement these changes in Richmond through a new Local Plan.

Involving communities

The documents can be viewed:

- online on the Council's Local Plan website (www. richmond.gov.uk/new_local_plan_direction_of_ travel_engagement)
- at all Borough's libraries[vi] and at the Civic Centre in Twickenham.

Any comments should be received by the Council no later than Sunday 22 March 11:45pm. You can respond:

- By completing the online questionnaire (www. haveyoursay.citizenspace.com/richmondecs/local-plan-20)
- By email to LocalPlan@richmond.gov.uk, or
- By post to Policy and Design, London Borough of Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, TW1 3BZ
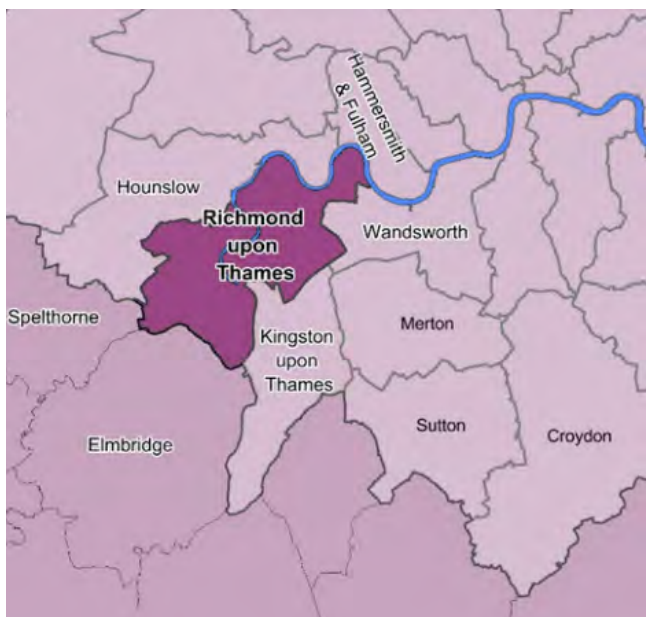
Please note that your response will not be treated as confidential and any anonymous responses will be discarded. A summary of the responses will be made available following the consultation period. These responses will be fully considered and taken account of when preparing Plan. There will also be further engagement opportunities to let us know your views later in 2020.

What happens next to develop the new Local Plan

We are required to follow statutory processes when developing a Local Plan. The stages in the preparation of a new Richmond Local Plan are set out in Figure 1. Details of the stages are set out in Appendix 1.

ONGOING	Evidence gathering
SPRING 2020	Direction of Travel consultation (CURRENT STAGE)
SPRING 2022	Pre-Publication consultation (first draft of Local Plan)
WINTER 2022	Publication consultation (final draft of Local Plan)
SUMMER 2023	Submission and examination
SPRING 2024	Adoption

Figure 1: Stages in the preparation of the Local Plan

Our place in London

We are bordered by four London Boroughs (Kingston, Hounslow, Wandsworth and Hammersmith & Fulham) and share a boundary with Surrey (Elmbridge and Spelthorne Boroughs). In addition, we work closely with the Mayor of London, the Greater London Authority (GLA) and Transport for London (TfL). Together with Croydon, Kingston, Merton and Sutton, we are part of the South London Partnership, which focuses on shaping sustainable growth across the sub-region.

We value our special and unique natural and historic environment. We play a significant role in providing opportunities for recreation, sport, culture and tourism for not only those who live and work in this borough, but also for those from neighbouring and other London boroughs.

Working with our neighbours and partners

We cannot act in isolation and therefore work hand in hand with communities and local partners. Our partner organisations and agencies include those within the public sector, business, community, voluntary and faith sectors. We also work closely together with neighbouring boroughs as well as the Mayor of London and Transport for London, particularly where issues cross borough boundaries.

What do we already know?

The process of gathering evidence is an ongoing stage throughout the development of a Local Plan. The evidence we have collated to date helps us to identify the issues that need to be considered. This includes surveys, analysis of existing information and monitoring of existing policies as well as research into particular policy issues/areas. National planning guidance places strong emphasis on ensuring our Local Plan to be based on relevant and up-to-date evidence.

We will undertake further studies as part of the preparation of the new Local Plan. Throughout this consultation document, we have identified areas where further research is required. We will also
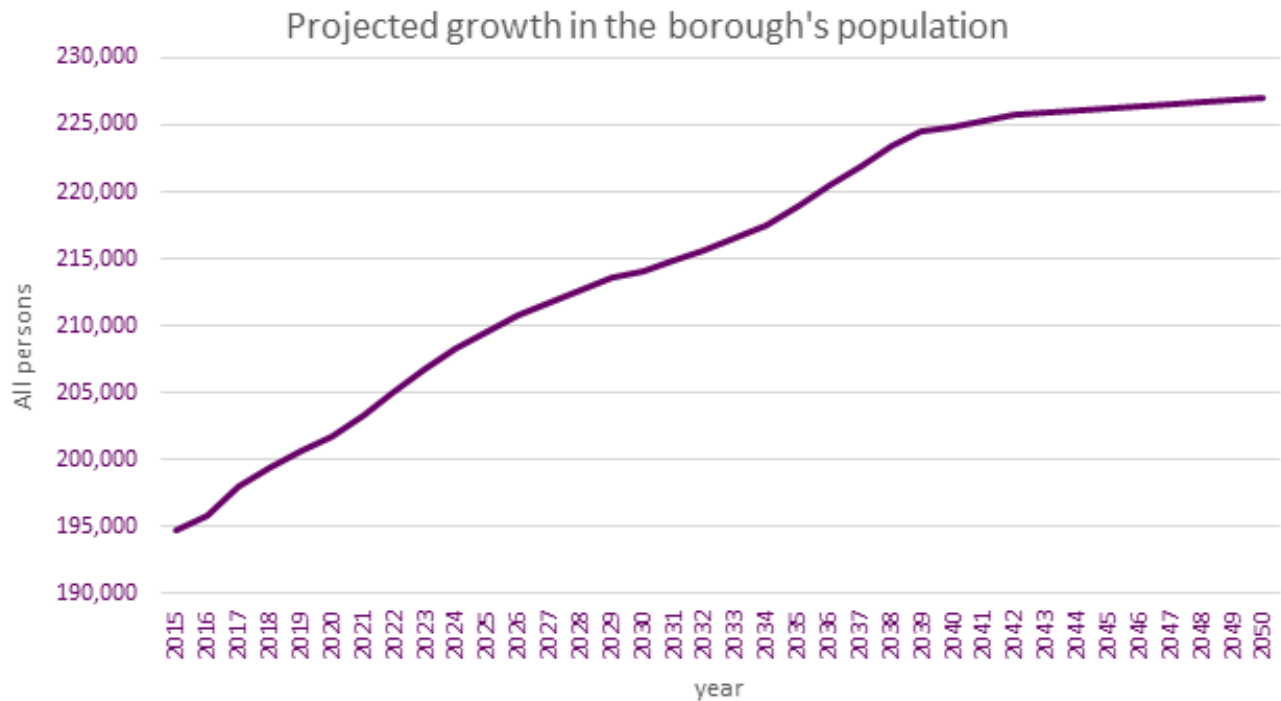
undertake an assessment to see whether the whole Plan is viable, which means the cumulative impact of all policies taken together will be assessed to ensure these do not stop development from coming forward. National planning guidance is clear that assessing viability at the plan-making stage means that future planning applications that comply with them should be assumed to be viable.
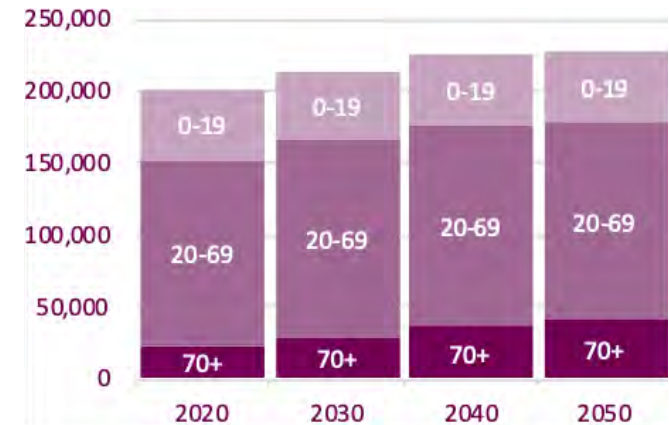
Sustainability Appraisal

We want to ensure that our new Local Plan has a strategic vision for shaping the future of our borough. It is important that the Plan will lead to environmental, social and economic improvements in the borough. We are required by law to undertake a Sustainability Appraisal. The purpose of the Sustainability Appraisal is to ensure the social, environmental and economic effects resulting from the Plan and its proposals are assessed. This process is iterative and carried out at various stages throughout the development of the Local Plan.

We have therefore updated our Sustainability Appraisal Scoping Report. This sets out the proposed sustainability framework, key sustainability issues and objectives that the new Local Plan policies and site allocations will be assessed against.

Please see Appendix 2 for the Sustainability Appraisal and Local Plan stages.

Projected growth in the borough's population

source: GLA 2016 Housing-led projections

The borough today, and what we know about a growing and changing population in the future

What are the key issues?

The borough is prosperous, safe and healthy. The borough's residents are expected to grow and change, with an ageing population. A strong driver of population growth is natural change, with borough-wide housing research in 2016 finding levels of migration relatively modest as a component of population change. The borough is an attractive location for families, with the borough-wide housing research in 2016 finding a notable in-movement of young families.

As Richmond has the highest house prices in Outer London (which is the group of London Boroughs that form a ring around Inner London boroughs), we expect that residents do move outwards from London, often related to life stage (family formation due to parenthood, marriage, cohabitation) and affluence (their financial resources) – either moving from the private rented sector into owner occupation (first time buyers) into relatively less expensive areas or those already in owner occupation moving into larger family sized properties.

The data for ONS migration flows shows flows are highest from Richmond to Hounslow, Kingston, Elmbridge, Wandsworth and Spelthorne, while flows into Richmond are highest from Hounslow, Wandsworth, Hammersmith and Fulham, Kingston, and Ealing.

The challenge is to support a changing and ageing population. A key focus will be understanding how we can support the health and wellbeing of people, and the potential impacts of an ageing population on adult health and social care provision.

There is also a workforce population. The borough's economy benefits from the presence of outside workers through their spend in the local economy. Although around half of those who work in the borough also live in the borough, there are also strong commuting flows in and out. The connectivity to Heathrow and central London by public and private transport is an asset, also supporting those commuting out for work.

The borough's unique characteristics are an asset, but also a constraint. We are the only London Borough spanning both side of the River Thames, and the area is interspersed with open space, linked by roads and interwoven by railways. This determines the character and connectivity of the area, as well as the nature of the population and workforce, with distinct variations across the borough.

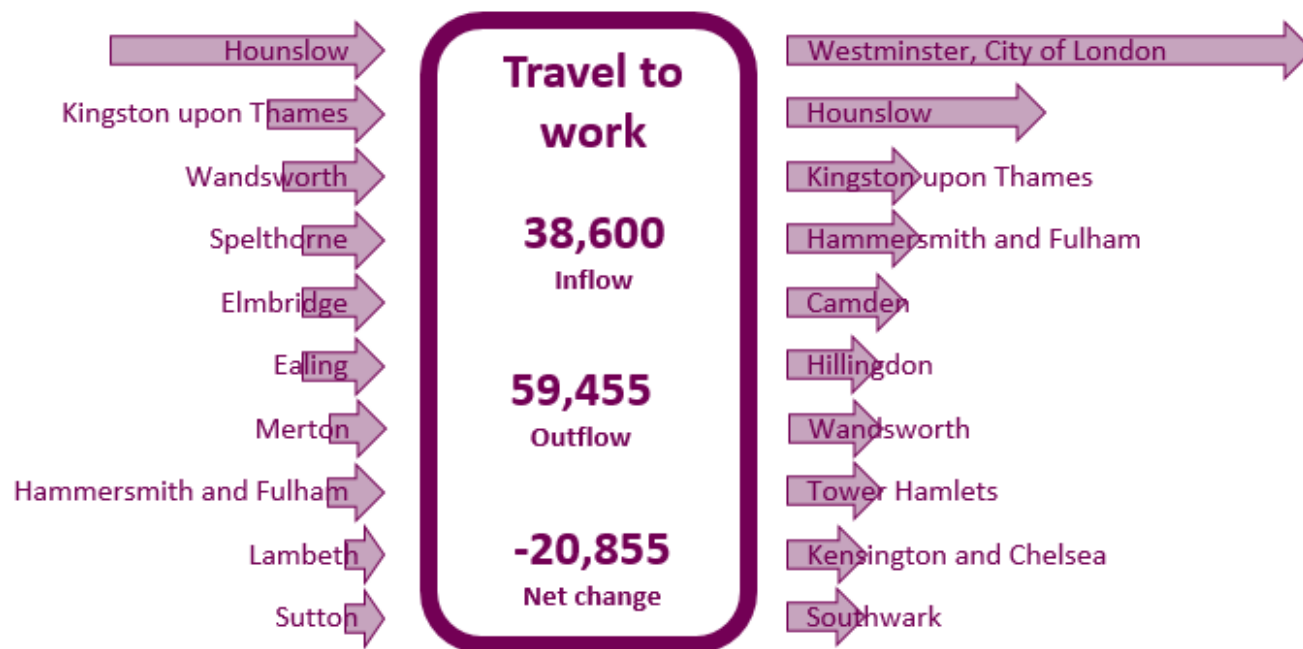The current Local Plan has already looked ahead to manage the changing population, which includes considering an ageing population and current and future infrastructure needs. We are working with partners to understand the potential impacts and will continue to do so, in terms of what this means for future needs, and the supporting services that residents, businesses and visitors will need.

We will seek to better understand the latest forecasts and trends at a local level. There may be opportunities due to changes in technology and infrastructure, as envisaged in the Council's Draft Digital Strategy, through improved connectivity and smart use, which could change how we travel, shop or use energy, resulting in changes to the services we will need in the future.

What do you think?

Please tell us any comments you would like to make about the introduction.

Does this document raise any specific equality impacts which would affect particular groups or communities of people in Richmond?

Travel to work

38,600 Inflow

59,455 Outflow

-20,855 Net change

Inflow from: Hounslow, Kingston upon Thames, Wandsworth, Spelthorne, Elmbridge, Ealing, Merton, Hammersmith and Fulham, Lambeth, Sutton

Outflow to: Westminster, City of London, Hounslow, Kingston upon Thames, Hammersmith and Fulham, Camden, Hillingdon, Wandsworth, Tower Hamlets, Kensington and Chelsea, Southwark

Scale of the challenge, opportunities and setting the Direction of Travel

We have identified the following challenges and opportunities for the borough which the Local Plan must consider. We are clear that the Local Plan needs to plan for change, there is not an option to do nothing. We are seeking your views now to find out what our new strategic vision, spatial strategy and the Plan's objectives should be for the new Local Plan, looking ahead to what the borough will be like in 15-20-years' time.

Our vision and overarching spatial strategy

An important part of the new Local Plan is the vision of what the borough should look like in 15-20-years' time. The vision will need to set out our ambitions for shaping the future of the borough and provide a clear picture of the role that development should play in creating sustainable growth. This will need to include a strategy to meet the future needs of the borough, identifying changes that may happen, and the broad locations for development. All policies and proposals that are to be developed as part of the Local Plan, will – upon the Plan's adoption – be used to determine whether new development is appropriate, which will help to deliver this vision.

What are the key issues that need to be addressed in our vision and ambitions for the Local Plan?

Richmond is a very special place to live, work and visit, with a unique character and identity that our communities value and are proud of. The borough is characterised by its special and unique natural and historic environment, providing opportunities not only for those who live and work in the borough, but also for those from neighbouring and other London boroughs, thereby providing a green lung for southwest London.

Local community needs, including delivery of housing and the infrastructure required to support it, are expected to be met without compromising the quality of the natural, built and historic environment. Despite the constrained nature of the borough, there is a need to provide more housing, employment and other community and infrastructure services. We face the challenge of accommodating growth and new development, doing nothing is not an option. Changing needs can undoubtedly bring pressure on the local character and has potential environmental impacts, which we should understand; it also brings opportunity to improve.

Whilst the physical infrastructure is one of the constraints to growth, the borough is also the most expensive outer London borough to buy in and private rents are high. Affordability and lack of opportunities for the provision and adequate supply of affordable housing are therefore key issues affecting the borough's residents, both in the ability to rent or buy property.

A large proportion of the borough's population work in managerial, professional and technical jobs, meaning that residents are generally highly skilled. Median annual earnings are considerably higher than the London average, which reflects the borough's position as a desirable place to live and to commute from for well-paid jobs. High car ownership combined with high rates of through-commuting is proving to be a significant challenge at a time where we want to move towards reduced dependency on the private car for journeys. The resulting congestion on local roads

Population Projections (Housing Led) (2018)

source: GLA 2016-based housing led projections
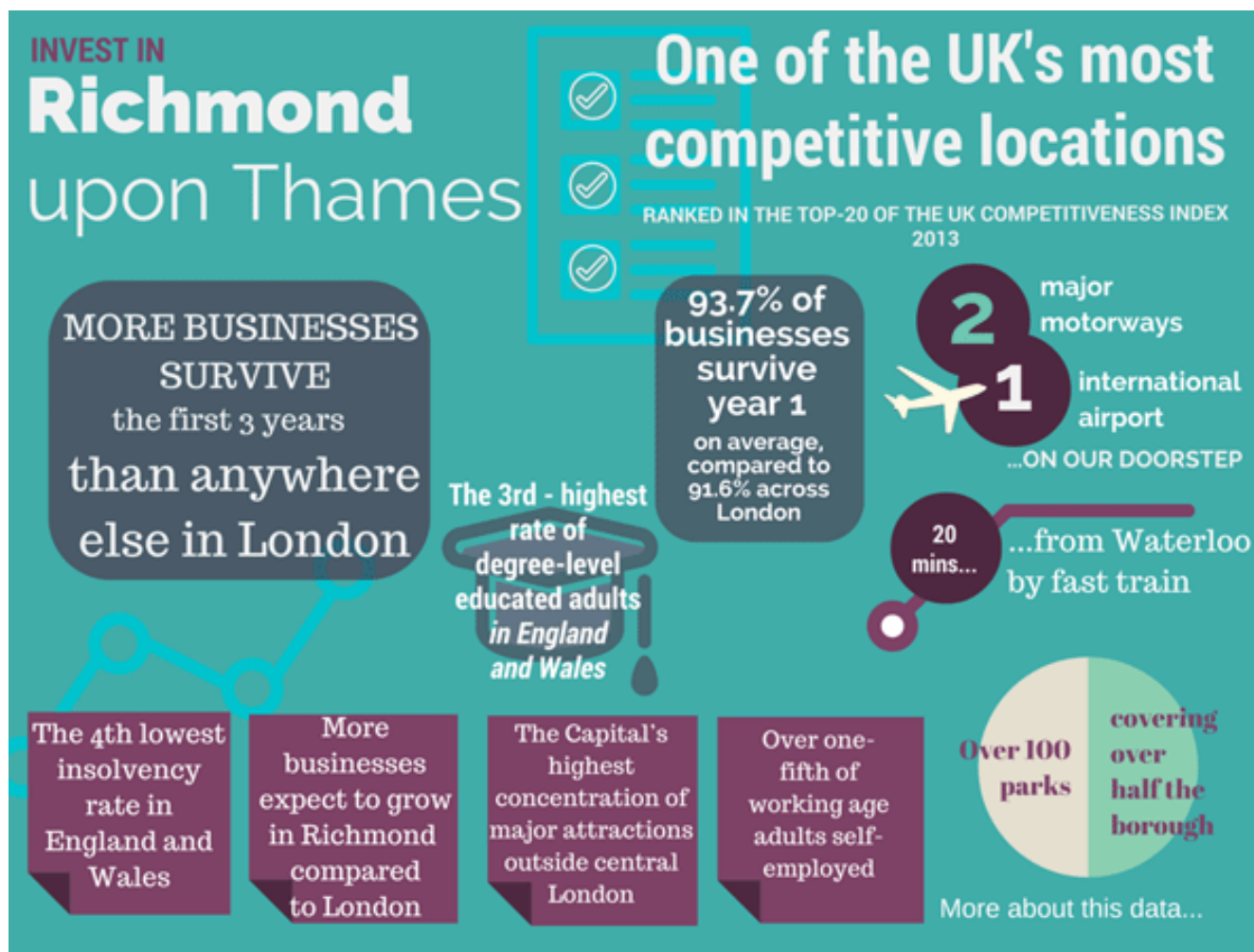
Sourced from the GLA Borough overview: https://iao.blob.core.windows.net/publications/reports/f11c199d237c4cb79bca5427bfe8511d/E09000027.html

also impacts on local air quality. Parts of the borough have poor connectivity, where we have ambitions to improve connections, and encourage higher levels of walking and cycling.

Richmond is an enterprising borough; with one fifth of the working age population self-employed and more businesses surviving three years compared to elsewhere in London. Overall, the borough has been relatively resilient to the economic pressures of recent years; however, there are some economic challenges, particularly as a result of limited land availability for employment purposes which puts pressure on the cost of doing business. We want to move towards creating a more self-sustaining borough, where education, training and job opportunities are available for our highly skilled population, so as not to add to the congestion problems on local roads and transport infrastructure that is already at capacity.

While many solutions to climate change will need to be tackled at a national or international level, we are firmly of the view that all levels of government, communities, businesses and individuals have a role to play in tackling the climate emergency. We can make a significant local contribution to tackling this crisis through our role in planning and development, and where possible, exceed existing national requirements for carbon emission reductions in new developments.

The need to protect and enhance the borough's parks and open spaces for wildlife and habitats will

INVEST IN
Richmond
upon Thames

One of the UK's most competitive locations

RANKED IN THE TOP-20 OF THE UK COMPETITIVENESS INDEX 2013

MORE BUSINESSES SURVIVE the first 3 years than anywhere else in London

93.7% of businesses survive year 1 on average, compared to 91.6% across London

The 3rd - highest rate of degree-level educated adults *in England and Wales*

2 major motorways

1 international airport
...ON OUR DOORSTEP

20 mins... ...from Waterloo by fast train

The 4th lowest insolvency rate in England and Wales

More businesses expect to grow in Richmond compared to London

The Capital's highest concentration of major attractions outside central London

Over one-fifth of working age adults self-employed

Over 100 parks covering over half the borough

More about this data...

also need to be balanced with providing active and inclusive environments for local communities for enjoyment and recreation. This is a key challenge for us, particularly in light of a growing population and

increasing pressures on our environment. Therefore, urban greening and creating further high-quality open spaces, which are designed to ecologically enhance and provide valuable habitats for

biodiversity, and where possible physically connect existing parks and open spaces to provide attractive and inclusive environments for all, is a key issue for this borough, and which will also help to make us more resilient to the effects of climate change.

How do we develop a new vision for the new Local Plan?

We do not want to create our new vision for the borough in isolation, and so we would like your views on how bold and ambitious our new Local Plan should be to provide the framework for growth for the next 15 to 20 years.

Our vision and new Local Plan will be written positively, and it will be about what you want to see rather than what you don't. We have to be realistic that the borough will change and needs to accommodate future growth, there is not an option to do nothing.

In the subsequent sections of this document, we have outlined the key challenges, opportunities and critical planning issues facing the borough, focusing on the strategic priorities to be addressed in the new Local Plan. **We have identified the following ten themes that will inform the new vision for growth in the borough:**

- **Responding to the climate emergency and taking action**
- **Delivering new homes and an affordable borough for all**

- **Shaping and supporting our town and local centres as they adapt to changes in the way we shop**
- **Increasing jobs and helping business to grow**
- **Protecting what is special and improving our areas (including Heritage, Culture, and Green infrastructure and protecting our open land)**
- **Increasing biodiversity and the quality of our green spaces, and greening the borough**
- **Improving design, delivering beautiful buildings and high-quality places**
- **Reducing the need to travel and improving the choices for more sustainable travel**
- **Securing new social and community infrastructure to support a growing population**
- **Creating safe, healthy and inclusive communities**

Our existing Local Plan sets out a vision and spatial strategy for what the borough will be like in 15 years' time (from the date of adoption in 2018). It is based on three inter-related themes of 'Protecting Local Character', 'A Sustainable Future' and 'Meeting People's Needs', which formed the basis of the strategic vision and the strategic objectives. The 2018 Local Plan seeks to protect and enhance the borough's character, directing the majority of higher density and larger scale developments to the borough's town centres, or key development sites identified as site allocations, and expecting the majority of future development to take place on brownfield sites.

Whilst elements of the existing Local Plan's vision are still appropriate, we need to consider what changes to make and think further ahead to the future. Most notably, we declared a climate emergency on 11 July 2019, and adopted the Climate Emergency Strategy in January of this year. We are therefore committed to an ambitious climate emergency strategy and action plan, working with partners, community groups and residents as well as businesses, to reduce the borough's carbon footprint. This affects all aspects of the Local Plan, which has an influence on land uses and the type and location of new development. The climate emergency and carbon neutrality are important parts of all we do, and the Local Plan will be a key tool in achieving our ambitions.

We also know that our population and needs are changing, and that we need to facilitate sustainable and active modes of travel for all. We are committed to continuing our existing approach to direct larger scale developments to the borough's town centres, and we will continue to expect the majority of development to take place on brownfield sites. Our new vision will need to look beyond our existing approaches and find additional means to accommodate the growth required to meet the changing and growing population. We need a positive vision that provides the framework for growth for the next 15 to 20 years. We need to find out more about future needs, as well as the capacity for areas to change, which is discussed in more detail in the rest of this document. The new Local Plan

will need to consider appropriate locations for new jobs and housing, along with the community needs and infrastructure that is needed to support this. For example, it may be appropriate to consider transport corridors, build on the existing network of centres, or areas already identified such as the uplift redevelopment programme at Ham Close.

What do you think?

- What challenges do you think Richmond borough faces now and in the future?
- How might our role in London change in the future?
- What do you think should be our priorities in the new vision?
- Have we covered all the key issues and overarching challenges facing the borough in the ten themes above or is there anything missing?
- In addition to our existing approaches of directing larger scale development to the borough's town centres, and expecting the majority of development on brownfield sites, where should we direct new growth in the borough?
- Should we continue to protect our green and open spaces from inappropriate development, or are there parts of the borough that could assist in accommodating growth?
- Which areas of the borough do you think are capable of taking more growth than others, for example based on their proximity to town centres and stations?

- Which areas of the borough may be suitable for more infill development and intensification?
- Are there parts of the borough that could be transformed through larger scale development and encouraging intensification (for example redevelopment of existing single dwellings to blocks of flats)?
- Would you like to see individual policies and strategies for each of the different parts of the borough (such as Twickenham, Kew, Barnes, Hampton and Hampton Hill etc.) and if yes, how could they vary?
- Can you suggest any other ways we could accommodate future growth and new development, ensuring support for sustainable communities?

You can also tell us about us about sites and broad locations as part of the 'Call for Sites', see the further details at the end of this document.

Responding to the climate emergency and taking action

What do we already know?

Richmond's per capita carbon emissions are 3.3 tonnes per capita in 2017; 49% of emissions for the borough originate from domestic sources, including domestic electricity and gas usage. (Source: Department for Business, Energy & Industrial Strategy)

The biggest area of emissions by far is that of stationary energy (emissions from the combustion of fuel in buildings, manufacturing industries, construction processes and power plants) at 67.7%, followed by transportation (combustion of fuel or use of electricity during journeys travelled by road, rail, air or water for intercity and international travel)

at 30.3%. For stationary energy, the largest area of emissions is from residential buildings at 66.35%, with the rest spread between Institutional, Industrial and Commercial buildings and facilities. In terms of transportation, emissions from this sector are dominated by on-road (60.94%) and aviation (39.05%). The data shows that the largest source of emissions in the borough is from energy consumption (gas and electricity) used in people's homes. (Source: Setting City Area Targets and Trajectories for Emissions Reduction)

Richmond Council declared a Climate Emergency in July 2019, and adopted its Climate Emergency Strategy in January 2020.

What are the key issues?

Climate change is now the greatest challenge facing our society. The scientific evidence of climate change is overwhelming, and the global impacts of climate change will be severe.
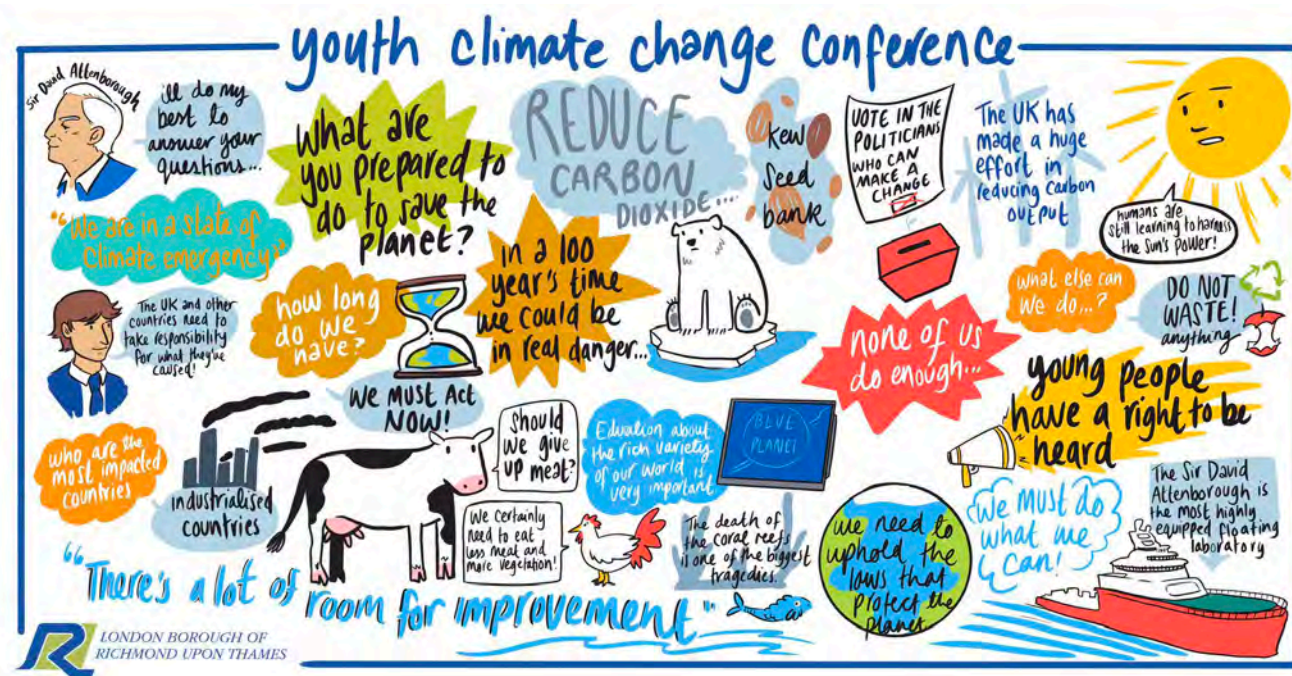
Delivering a sustainable built environment is crucial for Richmond's long-term sustainability and prosperity. We need to ensure that the borough is prepared for the adverse impacts of climate change, particularly those resulting from extreme weather events such as heat waves, droughts and flooding. The entire borough falls within an Air Quality Management Area (AQMA) designated since 2000, and we have an ageing building stock in the borough.

The borough also has a relatively high probability of flooding from many sources, including from the River Thames (both tidal and fluvial), as well as from surface water, groundwater, sewers and blocked culverts, and this risk will rise with climate change.

The majority of London, including Richmond borough, is at particular risk from surface water flooding, mainly due to the large extent of impermeable surfaces. The likelihood of surface water flooding is increased as more frequent and heavy intense rainfall during extreme weather events is unable to permeate through paved and hard surfaces.

London is within the driest part of the country and is potentially at risk of drought if reservoirs and groundwater aquifers are not refilled by regular rainfall, due to changing frequency and distribution of rainfall patterns including drier long summers. The cost of a severe drought to London's economy due to severe water use restrictions is estimated to be £330m per day[vii], and would have severe economic, social and environmental consequences, for example potential closures of schools, and damage to wildlife. There are likely to be more summer droughts and there is a pressing need for greater water efficiency due to increased water scarcity.

Climate change and extreme events will also challenge our wildlife. Temperature increases could result in migration of species or even loss of habitats, whilst drier summers are likely to impact on growth of our flora and its diversity. Various species of tree within the borough are particularly vulnerable to the

effects of climate change; this was evidenced in 2018 where a long, hot summer resulted in high mortality rates of both native and non-native trees.

What are we currently doing?

The environment is at the heart of local decision making, and our Climate Emergency Strategy 2020-2024 commits the Council to becoming carbon neutral as an organisation by 2030.

Our existing planning policies seek to minimise Richmond's contribution to climate change and ensure that we develop in a way that respects environmental limits and improves quality of life. It does this by:

- requiring zero carbon standards (see Glossary) for major residential developments and requiring major non-residential developments to be zero carbon from early 2020
- requiring high standards of sustainable design and construction in non-major developments, which far exceed those required by Building Regulations
- promoting decentralised energy opportunities
- requiring sustainable drainage design standards in all developments

- locating development away from areas at high risk of flooding
- minimising the effects of overheating as well as minimising energy consumption through layout, design and materials in developments
- maintaining and enhancing the green infrastructure network
- seeking biodiversity enhancements, including requiring green roofs and walls
- requiring resource efficiency, such as maximum water consumption levels in new developments that are more stringent than those set out in Building Regulations

Together, these existing policies already provide a pathway to a more sustainable and low-carbon future.

What do we have to find out?

As set out above, Richmond already has progressive climate change policies. However, monitoring and checking compliance with these policies presents challenges. We will therefore carry out additional monitoring to see how our policies are being complied with, and we will consider a requirement for all new developments to have smart meters installed that effectively measure energy usage and performance.

We will also consider undertaking research to identify decentralised energy opportunities, to generate heat and power at or near the point of use, and as such less reliant on transporting energy.

Source: https://ec.europa.eu/jrc/en/news/research-helps-europe-advance-towards-circular-economy

What do we have to do?

The Local Plan plays a central role in the transition to a low-carbon society as it allows us to engage communities and enable environmentally-friendly choices in areas such as built development, energy and transport. Our future Local Plan policies will have the ability to shape new and existing developments in ways that reduce energy need and consumption as well as greenhouse gases. They will also allow us to help adapt to climate change by future-proofing our existing communities.

The need to deliver high quality sustainable development continues to be a high priority for the borough. If anything, this need has increased since the publication of our Climate Emergency Strategy. We will need to consider a number of matters to inform our future policy directions, including:

- technological changes as the industry is making continuous progress on new innovations; also, existing low carbon technologies are becoming more efficient
- the government's genuine commitment to zero carbon developments, because since its first introduction in 2008, numerous changes to legislation and policy guidance have occurred
- the Mayor of London's approach to climate change and zero carbon developments, as set out in the new London Plan

We will consider the following policy directions:

- Adopt the new London Plan policy approaches for requiring all major developments to be zero carbon;
- Introduce more stringent requirements for non-major developments, setting out a clear path to zero carbon standards for all types of developments;
- Explore the potential for the development and expansion of decentralised energy networks;
- Encourage a circular economy, as opposed to a traditional linear economy of 'make, use, dispose', to ensure resources are kept in use for as long as possible. This approach which maximises use of existing materials can also be applied to making best use of land when deciding whether to retain existing buildings in a development;

What do you think?

- Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.
- How can we promote high quality sustainable development as part of a new Local Plan?
- How can we continue to set out a pathway to zero carbon?
- How ambitious shall we be in requiring zero carbon standards for all developments?
- Are there other planning means to mitigate and adapt to climate change that you want us to pursue?
- Are there any other climate change and/or sustainability issues that you would like the new Local Plan to address?

Delivering new homes and an affordable borough for all

What do we already know?

In 2018/19 419 housing units were completed, with 70% of delivery from large sites.

34% of all completions were small units (studio / 1 bed) and 39% were 2 beds.

The 2018/19 Housing AMR data shows (position as at 1 April 2019) an identified 1,474 units, a five-year housing land supply of 6.3 years. The results of the 2018 Housing Delivery Test for Richmond showed 1,332 homes delivery 2015/16 to 2017/18 against 945 homes target, a measurement of 141% and therefore no action required.

Housing at a glance

🏠	📈	💰
84,790	**382**	**£640,000**
Number of properties (2019) ℹ	Net additions (dwellings) (2017-2018) ℹ	Median price of a property (Q1-2019) ℹ

315 PER ANNUM 2015-2025 = **3,150 HOMES TO BE BUILT BETWEEN 2015 AND 2025**

What are the key issues?

There is increasing pressure on the local housing market. The borough will have to accommodate housing growth, and provide additional housing choice in the market.

The housing target for the borough is derived from the London Plan, which treats London as a single housing market. The current London Plan target for the borough is a minimum of 315 homes per annum. The new London Plan proposed a significant increase in the overall housing target, with a particular increase in small sites delivering additional housing across outer London based on standardised growth assumptions. This in turn resulted in a significant proposed increase for the borough to deliver a minimum of 811 homes per annum (2019/20 to 2028/29). However, at the time of writing, the Examination Panel Report has recommended a change to the borough target to 411 homes per annum, to reflect the realistic output from small sites, which the Mayor of London has accepted. The final housing target, including any specific small

sites target, will not be known until the London Plan is finalised in spring 2020; however, the Mayor of London's rationale for driving a step change increase in housing delivery is clear.

Housing need refers to the number of houses required given population growth. The Government introduced a new standard method for assessing local housing need, as the minimum starting point in the process of deciding how many homes need to be planned for in an area. Although local circumstances can be put forward for an alternative approach, it is expected that this standard is used, and the Government agenda for increasing housing delivery is clear. For the longer-term, Government will require us to plan for a higher housing target in the future, and we will need to evidence what is deliverable.

We need to make sure that new housing is of the size, type and tenure needed for different groups - for example, providing opportunities for growing families as well as those looking to downsize, and of a satisfactory standard to provide for future occupiers, as well as consider the impact on existing communities.

What are we currently doing?

We currently have a five-year housing land supply and are on track to deliver the current London Plan housing target. We have identified the need to provide family housing outside of the main centres and mixed use areas. Housing to meet identified specific community needs is supported, where

it is in a suitable location. We have adopted the Nationally Described Space Standard, and require the provision of adequate external space, as well as the Government's higher optional standards to improve inclusive access.

What do we have to find out?

Undertake a Local Housing Needs Assessment in 2020/21, to reflect current and future demographic trends and market signals (such as around economic growth, diversification and innovation), and include assessing future needs of different groups including families with children, older people, people with disabilities, service families and people wishing to build their own homes, along with Gypsies and Travellers. We will need to consider, along with assessing capacity and constraints, potential locations for additional housing, including identifying key site allocations, and the ability to deliver from small and large sites, to meet local needs.

We need to consider opportunities to make more efficient use of every piece of land to maximise the delivery of new housing, and assess if new and changing types of housing may play a part in meeting local needs, such as custom and self-build, the private rented sector, and purpose-built shared living.

What do we have to do?

We are considering the following policy directions:

- Provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address
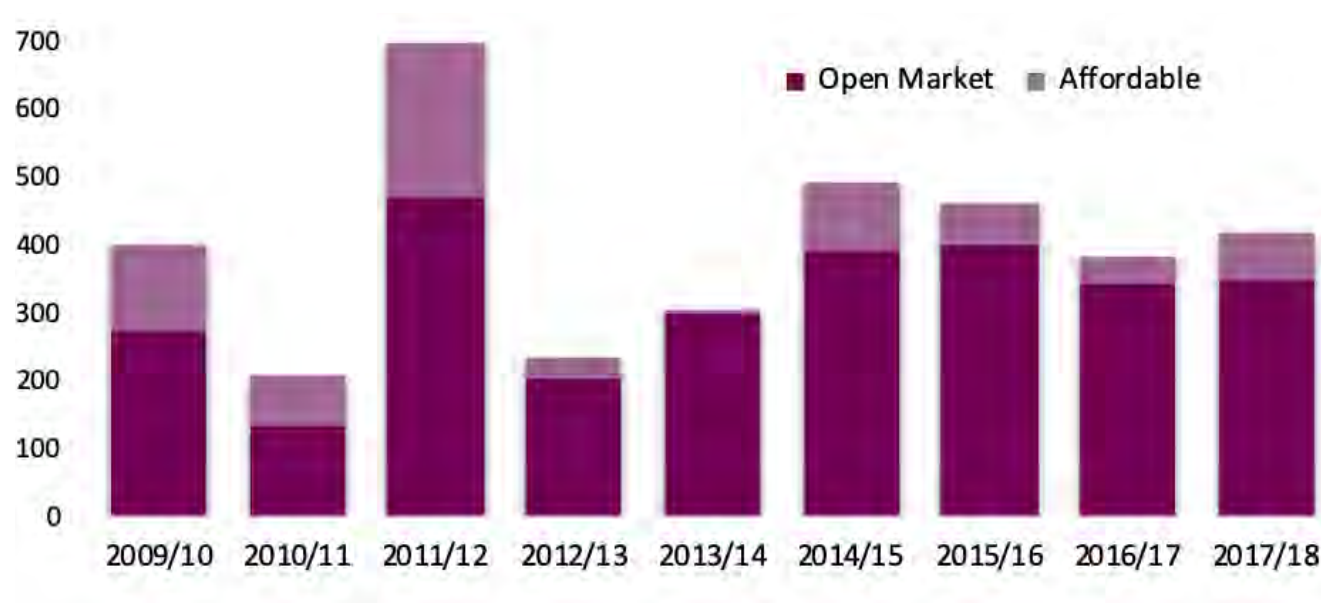
objectively assessed needs over the plan period based on the Local Housing Needs Assessment, including identifying housing requirements for neighbourhood areas which reflect the spatial strategy for the pattern and scale of development.

- Set out priorities for the type and size of new dwellings, which may vary by location, including for supported housing and specific groups, informed by the outputs of the Local Housing Needs Assessment and the Urban Design Study.
- Consider whether new types of housing could assist with delivery, such as custom and self-build and the private rented sector.
- Consider an approach to supporting housing delivery from small sites in some areas, where there is capacity for change (identified in the Urban Design Study) provided it promotes good design, addresses the impacts on local infrastructure and supports a mix of uses, to consider the needs of existing local communities,
- Continue to require high standards for new residential development in terms of internal and external spaces and inclusive access.

Affordable housing

What do we already know?

17% of units delivered as affordable in 2018/19 (2018/19 Richmond Housing AMR). Average house price is 13.1 times the average working person's income for the Borough (Hometrack, July 2019). In Richmond, during 2018/19, 1,002 households

approached the Council presenting themselves at risk of homelessness. The Richmond Housing Register as at June 2019 - 4364 households for whom the Council has accepted a 'duty to house' on the Council's Access Queue requiring affordable rented homes.

What are the key issues?

Affordability is an acute issue in the borough. Richmond has the highest house prices in Outer London (Hometrack July 2019) with almost the entire borough having house prices which are more than 10 times income. Similarly, Richmond is an expensive area to rent privately and has some of the highest rental prices in Outer London[viii]. Many households struggle to access the local housing market, and yet

Richmond upon Thames has the fourth smallest housing association sector in Greater London in which to meet housing need (Census 2011). The key issue is that we are not delivering enough genuinely affordable housing, and changes in the population will continue to increase the need for more affordable housing.

What are we currently doing?

Borough-wide housing research in 2016 for the current Local Plan showed a net deficit of 964 affordable homes per annum, demonstrating a substantial need for affordable homes. The Council's recent refresh of the Housing and Homelessness Strategy seeks to deliver more affordable housing.

While the Council does not directly provide housing, it works in partnership with the GLA, Registered Providers and the voluntary and community sector to address housing issues.

The Government sets a definition in national guidance of affordable housing, which has to be used for planning purposes. The Council's housing strategies and guidance ensure new affordable housing meets our local priority needs. Housing strategies and guidance seek genuinely affordable rents for lower income households, while also providing opportunities for moderate to medium income working households to access intermediate rent and low-cost home ownership opportunities.

Planning policies seek to maximise affordable housing contributions. Opportunities to provide new affordable housing are limited in the borough however, due to shortage of developable land as well as high land values and development costs. Contributions to affordable housing from all sites have been justified in current policy, as the evidenced local circumstances have justified lower thresholds as an exception to national policy. Viability evidence is always scrutinised to ensure that affordable housing contributions are secured wherever viable.

There are opportunities for diversifying the developers and schemes brought forward to increase capacity and speed up delivery. New and innovative approaches to development, including Build to Rent, community-led housing, and self- and custom-build, could play a role. Moreover, with increasing need for new homes, some will need to be built using precision-manufacturing (also known as modern methods of construction, or offsite manufactured). Some of these opportunities could assist in addressing affordability. However, the priority need is for family housing for rent.

What do we have to find out?

Undertake a Local Housing Needs Assessment in 2020/21, which will include an assessment of affordable housing needs for all households whose needs are not met by the market, including consideration of over-crowding and concealed households.

What do we have to do?

We are considering the following policy directions:

- Continue to seek 50% affordable housing, taking a transparent and robust approach to challenging viability evidence, to maximise delivery.
- Set out clear priorities for genuinely affordable family homes for rent and homeownership housing for working residents on low to middle incomes.
- Housing developments will be designed to maximise tenure integration, and affordable housing units will have the same external appearance as private housing.
- Continue to justify that contributions to affordable housing from all sites, including small sites, are required, due to the local circumstances in the borough.

- Look for new ways to deliver affordable housing for those on lower incomes.

What do you think?

- Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.
- What do you think are priorities for the type and size of new dwellings?
- Could other forms of housing assist with meeting local needs?
- Would you support housing delivery from small sites, if it is of good design and contributes to local infrastructure?
- What other ways could help deliver more affordable housing, in the right locations, given land values and property prices in the borough, and recognise the wider community benefits it brings?

Shaping and supporting our town and local centres as they adapt to changes in the way we shop
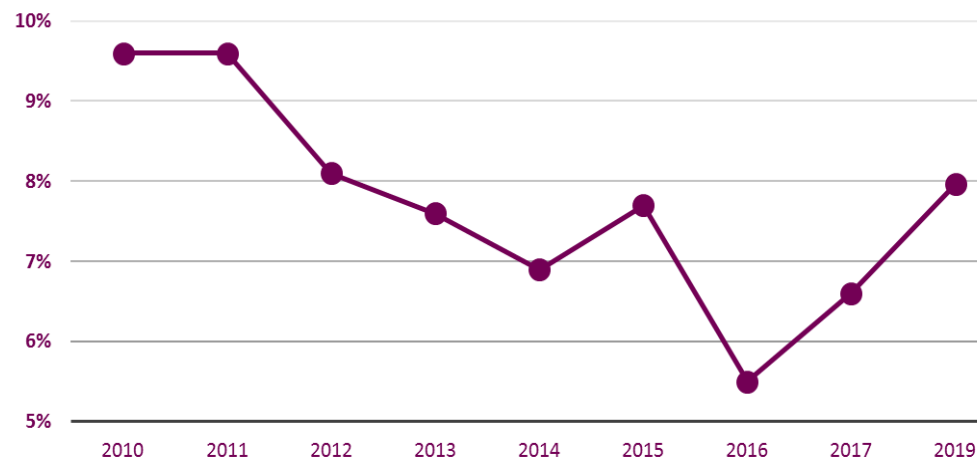
What do we already know?

The borough's town centres of Richmond, Twickenham, Teddington, Whitton and East Sheen currently perform well compared to other parts of London and the country and since 2012 have typically been between half and approximately two thirds of the national figure.

Vacancy levels are generally regarded as a good indicator of the health of town centres. The very latest data[ix] show a GB vacancy rate of 11.8% for the first half of 2019, and a retail vacancy of 13%. These figures have fluctuated recently, falling to a low in the second half of 2016, after which they have been gradually rising, although not as yet reaching 2013-2014 level.

The borough vacancy rate has also risen over the last 2 years to 8.0%, compared with 6.6% in 2017.They have not reached the levels experienced in 2012. Vacancy rates are lower in designated shopping frontages. In 2019 the

Vacancy Rate 2010-2019

borough-wide shop vacancy rate was 7.4%, higher than in 2016 & 2017 but lower than in 2015.

Previous consultations have shown that our towns and are valued by residents and visitors. Policies steer major trip generating development into these centres.

In addition to the five larger centres there are around thirty local and neighbourhood centres and parades spread across the borough, which are particularly important for top-up shopping and especially for those who are less mobile or who don't have access to a car for shopping. It has been an established principle to provide local shopping opportunities within 400 metres of people's homes by protecting shops and facilities which meet a local need.

In the past our retail research has consistently identified a need for modest additional retail floorspace as a whole, driven primarily by the borough's rising population.
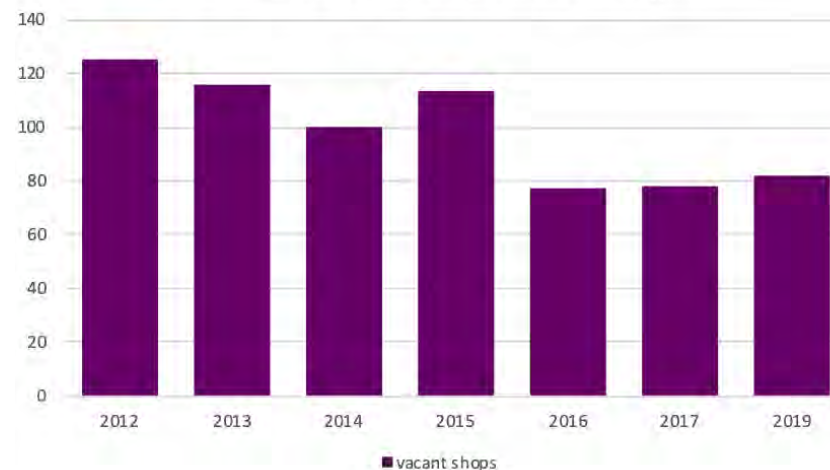
What are the key issues?

Nationally, there have been significant structural changes to the retail sector, with new ways of shopping now established, particularly internet shopping. Retailers are looking to concentrate their stores in a smaller number of larger centres. Department stores are struggling to compete. It is becoming increasingly common for large out of centre superstores and retail parks to be redeveloped. The trend to close bank branches, particularly in smaller centres, has continued.
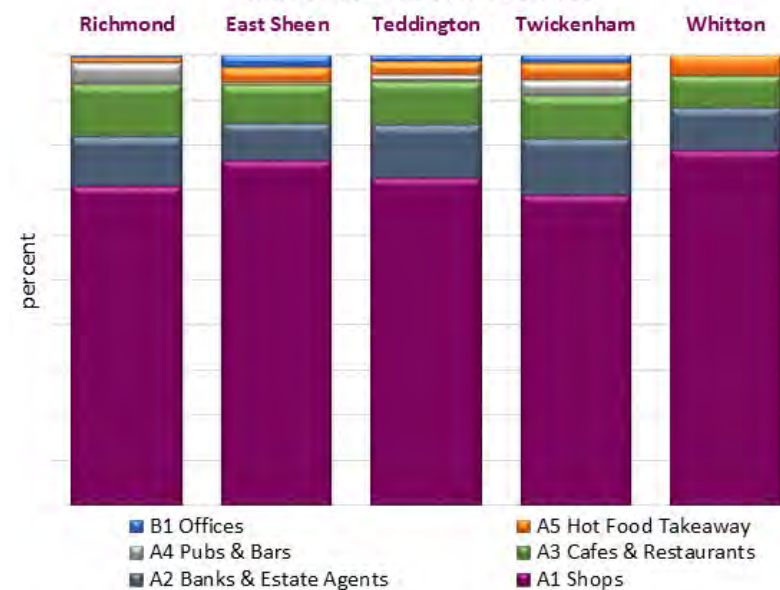
Some businesses operate in a more flexible way, as the distinction between use classes[x] becomes less obvious. This is particularly noticeable when considering coffee shops/cafes which can operate under an A1, mixed A1/A3 or A3 use class depending on their business model.

The new Local Plan looks forward, and will cover the 15 years from adoption, during which period such changes are likely to have an increasing impact on our town centres. We need to make sure our centres can adapt to change and continue to be successful, attractive and distinctive places at the heart of the community they serve which meet people's needs. Determining the optimal balance of uses that support healthy town centres, contribute to meeting the borough's housing, retail, employment and community needs, and enhance the special character of our towns will be a crucial role of the new Local Plan.

Numbers of vacant shops in the borough

■ vacant shops

Mix of uses in town centres

■ B1 Offices
■ A4 Pubs & Bars
■ A2 Banks & Estate Agents
■ A5 Hot Food Takeaway
■ A3 Cafes & Restaurants
■ A1 Shops

source: LBRuT, Centre Land Use Survey 2019
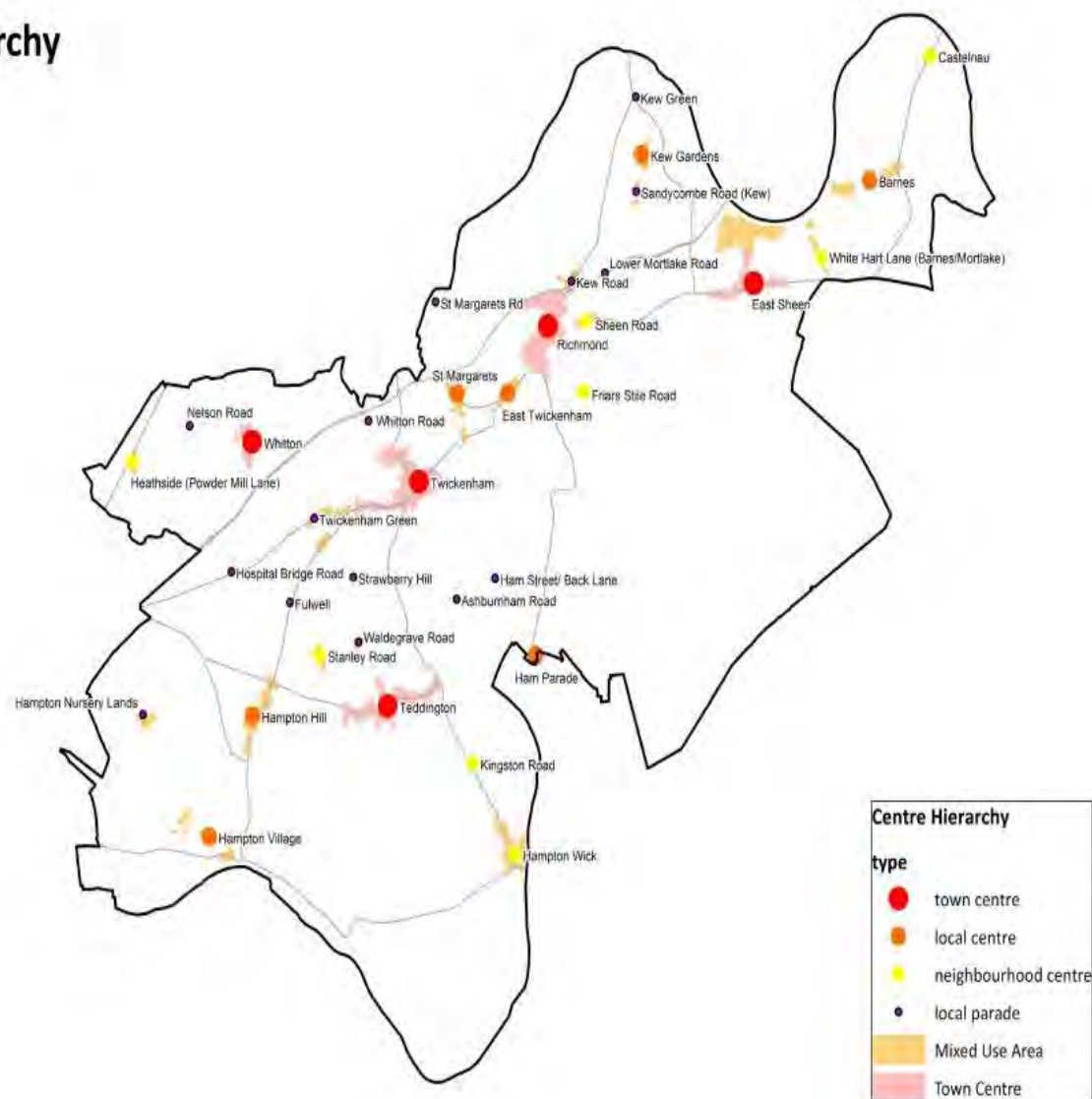
What are we currently doing?

As required by national and regional policy, the existing Local Plan sets out a hierarchy of centres (shown in the map below/adjacent) and sets out what type of development is acceptable, where it should go and the scale that is appropriate, for each type of centre. It includes some detail of the vision and approach for centres as set out in the Village Plan SPDs. Existing policy includes locally set thresholds for impact and sequential tests.

The Council has a duty to provide enough shopping floorspace to meet need. Current policies meet this need by managing change between land uses in centres, particularly away from shops, and where required, by allocating sites. Designating shopping frontages is a good way of controlling change of use and is retained as a valid approach in the National Planning Policy Framework (NPPF) and London Plan and used widely. Existing local plan policies resist loss of retail floorspace in key shopping frontages and allow for some change in secondary frontages. Elsewhere, in non-designated frontages, it is recognised that former shops can provide opportunities for small businesses and community uses.

Policy also provides additional control where there is a demonstrated over-concentration of a particular type of use, such as restaurants and cafes or takeaways.

Policy also provides some additional protection for shops selling essential goods and Post Offices as far

Centre Hierarchy

Centre Hierarchy

type

- ● town centre
- ■ local centre
- ■ neighbourhood centre
- • local parade
- ▨ Mixed Use Area
- ▨ Town Centre

as the planning system allows. It is important to note that the planning system does not allow for policies which distinguish between specific retailers. In order to provide local facilities for residents it controls change of use where the shop/service is meeting a local need.

However, the Council does not want to encourage high levels of vacancies in areas where shops are no longer viable. The centre hierarchy, designated frontage policy and the amount and location of designated frontages seek to prevent this from happening. The existing Local Plan sets out requirements for marketing evidence when a change of use is applied for.

What do we have to find out?

We will be looking at our retail evidence base, to ensure that we have a robust basis for planning for the future of our centres, looking in depth at the potential implications of changes to how we shop and use our centres in this borough, whilst being mindful of the Council's duty to meet people's shopping needs. It is possible that we might have too much shopping floorspace at some point in the future and a more flexible approach to change of use is needed. However, we should also be mindful that once converted retail floorspace is unlikely to be returned to retail use, as some other land uses are more valuable. Also, the borough has very few sites where new retail development could be provided if needed. Some retailers consider that to be successful, their businesses must sell their goods

via a variety of ways and that shops are still an important part of their offer.

To develop the right policies, our evidence needs to tell us:

- how much shopping floorspace is needed? Over the plan period will we need more or fewer shops/ shopping floorspace?
- identify whether contraction or potentially growth will take place. Some centres may need the same amount of shopping space, others are likely to need less. Research will inform strategies for our centres, aiming to make them unique and distinctive, and whether our existing centre hierarchy needs to be changed.
- whether the approach should be less protective towards shops and if this is the case, how much flexibility is needed and how this should be used to maintain healthy and sustainable centres?
- help us to identify and assess the suitability of Site Allocations
- help us to measure the health of our town centres using a range of indicators
- identify whether there are parts of the borough where there is inadequate access to shopping, taking into account areas of disadvantage and where major residential development is planned
- provide information on the size of shops and the link between size and viability.

What do we have to do?

We are considering the following policy directions:

- The Local Plan's spatial strategy should continue to direct major retail development into the five main centres.
- We will need to review the borough's centre hierarchy. The five town centres form part of the Mayor's Town Centre Network in which they are defined as major or district centres. We can assess smaller centres to determine if they are in the correct tier of the hierarchy and look at the hierarchy itself to see if it is still the best way to categorise centres.
- If the evidence supports the need to reduce the amount of retail floorspace, policies should be more flexible and allow for more change of use to other uses which attract people to use those places.
- Policies could encourage more housing in centres to help meet housing need, including change of use of an entire shop to housing without keeping a commercial or community use on the ground floor.
- We need to develop a vision and strategy for individual centres which reflect the specific local context.
- Policies will continue to define key and secondary shopping frontages to control the types of uses we would like to see in our centres. This is an established approach supported in national and regional policy. These policies can be reviewed to allow for more, or less flexibility. We will need to

review the existing designated frontages to ensure that designated frontages provide an appropriate balance of uses for each individual centre.

- The Council will continue to aim to provide top-up shopping opportunities within walking distance for residents and protect local shops and services serving a localised need.
- There is community and economic value in protecting public houses and policies should continue to do so, assessing marketing evidence where the proposal would result in the loss of a pub.
- The existing Local Plan requires a Retail Impact Assessment for all applications for retail of more than 500m2 gross. For retail and leisure proposals of more than 200m2 gross which are not in centres, existing policy requires that the sequential test is satisfied. Research will help to inform us whether these thresholds remain appropriate.
- Marketing evidence will continue to be needed for changes of use not in line with policies. Should the length of time a site is marketed be reduced from two years? It is possible to tailor the length of time needed for robust marketing, to reflect different land uses and centres.
- Policies should continue to resist development in less central locations in line with town centre first principles. A general policy for developing existing out of centre developments/retail parks for other uses could be developed.

What do you think?

- Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.
- Do you agree with the spatial strategy proposed? Should major development be encouraged equally amongst the five town centres? Or should for example, Richmond and Twickenham be the appropriate location for the majority of any new retail floorspace?
- Does the existing hierarchy categorise borough centres correctly? Are there too many local centres and parades in this defined centre hierarchy? Local centres, neighbourhood centres and parades are relatively well spread across the borough. However, should we reduce the number of centres in the hierarchy, and/or reduce the amount of/or completely remove designated frontages in some, taking into account their role in meeting local need?

- If the evidence supports a more flexible approach to retail policies what other uses should be encouraged?
    - Café culture could be encouraged and/or the night time economy. Are there some centres where this would be preferable? Should we be flexible in terms of mixed A1/A3 uses? Existing policy currently restricts further entertainment uses such as cafes and restaurants, drinking establishments and takeaways for specific frontages in parts of centres where there are over-concentrations of such uses– should it continue to do so? Are those areas still appropriate and should other areas be considered? If so, which ones?
    - The borough could potentially lose around a third of its office stock as a result of the government's introduction of permitted development rights allowing change of use from office to residential. Uptake has already affected the availability of office stock in the borough and impacted negatively on the local economy. Should policies identify parts of town and local centres where offices could be encouraged to contribute towards increasing office provision?
    - Is there more scope for further community uses in centres, potentially even in key retail areas?
- Would housing, including residential on upper floors, work if located next to other (potentially noisy or smelly) uses in centres? Where might a relaxed policy to encourage more housing apply? Should it, for example, apply in designated frontages?
- In terms of developing centre strategies and visions, what should they include? How should these relate to local and wider transport accessibility? Your views in relation to specific

centres are welcomed.

- Should the amount of key shopping frontages be reduced and/or should secondary shopping frontages (where some change of use is already allowed) also be reduced or removed altogether? Do we need to protect shopping in just the core areas which correspond with designated key shopping frontages? In the past a compact retail core was thought to foster comparison shopping (i.e. for those goods that people tend to go to several shops to compare products and prices before buying them, such as electrical household items, clothes and shoes).
- Should the 'key shopping area' relating to the operation of permitted development rights continue to be both key and secondary frontages?
- Is it appropriate to continue to protect local top-up shopping facilities? Should this protection only extend to food shops and/or some selected types of businesses? Is 400 metres an appropriate proxy for easy walking distance? Should we continue to provide additional protection for shops selling essential goods and Post Offices generally?

- Do we need to continue to protect pubs as strongly? Some pubs that do not have a food offer are struggling to stay open, despite their potential value to the community.
- Are the locally set thresholds for impact and sequential tests still appropriate?
- How long should shops and pubs be marketed before a change of use is allowed if the proposal is contrary to policy?
- Should a policy be developed for redevelopment of existing retail parks/stores in less central locations?

Increasing jobs and helping business to grow

What do we already know?

The economy of Richmond has a fairly diversified economic structure. The largest sectors locally include business services, creative industries and the visitor economy. There has been growth in self-employed and micro-businesses, which reflect an entrepreneurial local labour force. Businesses are spread throughout the borough, including in residential areas in part as a result of the presence of small shops, studios and home-based businesses. Our 2018 business survey[xi] told us that the number one reason why business owners liked the borough was proximity to their place of residence. The town centres provide a focus for commercial floorspace, with Richmond the main economic centre.

Research for the GLA indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041, mostly driven by strong demand for logistics to service growth in London's economy and population. The GLA's assessment indicates that after factoring in both the positive net land demands and the management of vacancy rates, there would be scope to release a further 233 hectares of industrial land over the period 2016 to 2041. However, the demand assessment shows that in 2015, 185 hectares of industrial land already had planning permission to change to non-industrial use and a further 653 hectares were earmarked for pote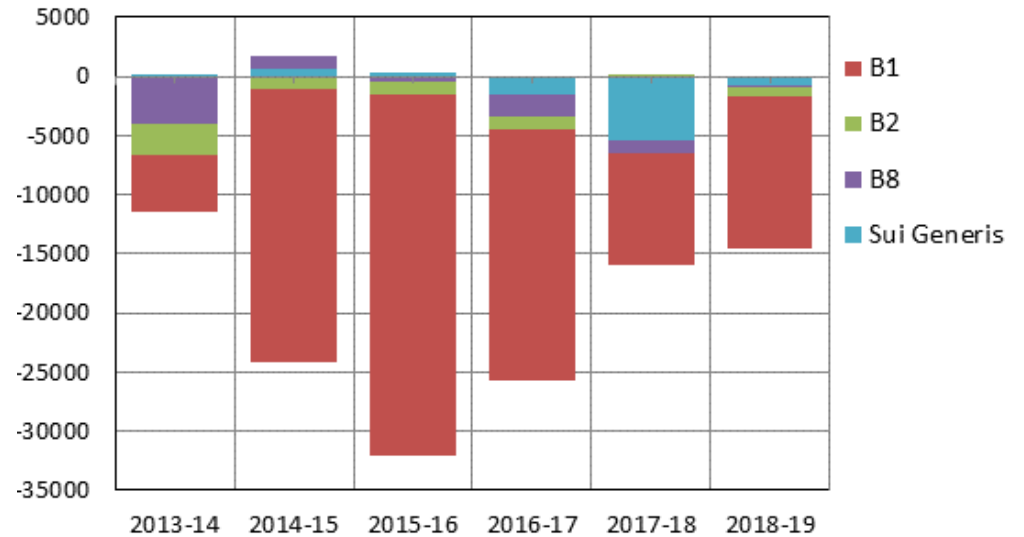ntial release in Opportunity Area Planning Frameworks, Local Plans and Housing Zones. Based upon this evidence, the London Plan addresses the need to retain sufficient industrial, logistics and related capacity by seeking, as a general principle, no overall net loss of industrial floorspace capacity across London in designated Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). Floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio (whichever is the greater). Development proposals should ensure that sufficient yard space is provided having regard to the operational requirements of the uses proposed.

Boroughs such as Richmond in the London Plan 'Retain' category should seek to intensify industrial floorspace capacity following the general principle of no net loss across designated Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS).
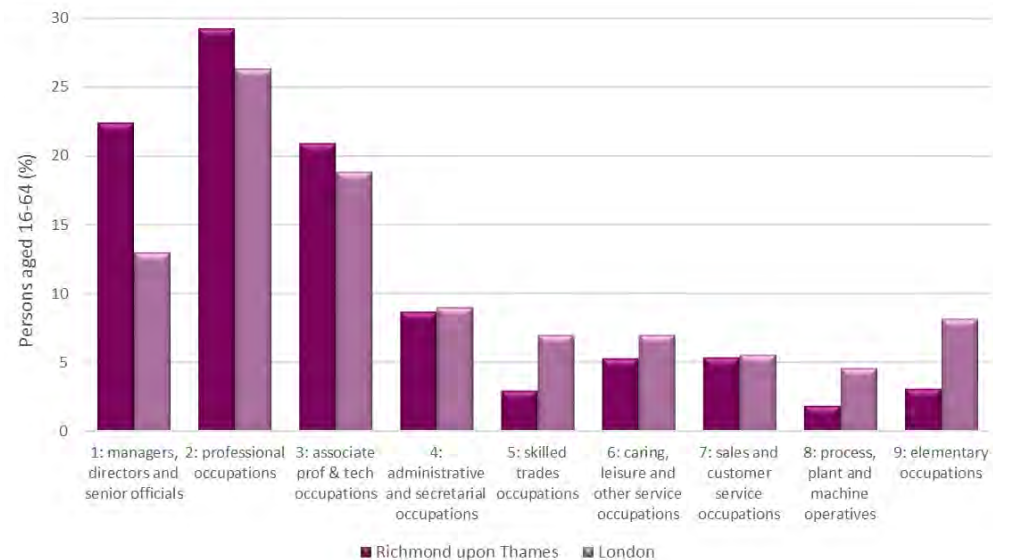
The South London Partnership (SLP) Industrial and Business Land Study (Ramidus) 2018 also identified in industrial and employment premises an acute shortage of small (100-200 sq m, or 1-2,000 sq ft) light industrial units, which has led to recent sharp rises in rents – which has led to increased institutional investment in industrial and employment land, which, in the medium to longer term will encourage redevelopment and refurbishment of older estates. It recommends retaining older, secondary space as well as meeting the structural change that is occurring in demand by providing flexible and affordable space, and how to nurture modern space, capable of accommodating modern businesses.

We have seen a loss in employment floorspace over recent years.

Employment Floor Space Losses 2013/14 to 2018/19 (Employment AMRs):

74.2% employed. £40,787 Median annual gross pay (2017). Business density levels are high – entrepreneurship and start-ups, high presence of small business units.

What are the key issues?

The borough has a significant local economy, with businesses scattered throughout the borough. There is a lack of affordable land for businesses and pressure for redevelopment to residential. While we have been taking a restrictive stance to protecting the stock of employment land and property, there remains a need to further protect its loss.

The way we work is continuing to change, for example the popularity of working from home and provision of serviced accommodation for flexible use has become more popular. We are increasingly seeing a merging of offices, light industrial and storage and distribution uses into a hybrid use where often neither one is the dominant use and certainly where one can't operate without the other. This is often down to changes in how businesses physically operate, mainly driven by the expectations of the customer who increasingly require next day delivery. The new London Plan suggests boroughs should be proactive and encourage industrial intensification as part of a plan-led or masterplanning approach. The borough contains the River Thames and other important waterbodies including the Rivers Crane, Duke of Northumberland, Longford and Beverley Brook. River related industrial and business uses, especially those supporting river-dependent uses such as the construction, repair, servicing and sale of river craft, make a vital contribution to the continuation of the historic tradition and function of the Thames for transportation, communication and recreation as well as forming part of the local economy. Riverside

locations are often seen as attractive for uses that are neither related nor dependent on the water such as residential. The Council will continue to protect river dependant facilities, such as boatyards and sheds, public and private wharves, slipways, wet and dry docks and cranes, piers, pontoons, jetties and stairs essential for the survival of river related industry and to support the continued active use of the river.

Permitted development rights for change of use from office to residential have continued to impact on the availability of accommodation for B1 uses in the borough, for which earlier studies have shown there to be continued demand. Although the borough's Key Office Areas are now covered by Article 4 Directions which restrict this change of use without planning permission, there are still large areas of the borough where buildings can be converted without permission. The type of buildings at risk of being converted tend to be those suitable for providing lower cost workspace for the borough's high proportion of Small and Medium Enterprises (SMEs), including start-up and micro businesses. As a result, there is a need to protect the borough's remaining stock to ensure that there are premises available to ensure existing businesses can remain in the borough and new businesses are able to locate here.

When we talk of industrial therefore we include Industrial- type uses such as the following which may be a hybrid mixture of use classes:

1) light and general industry (Use Classes B1c and B2) e.g. car repairs, furniture manufacturing

2) storage and logistics/distribution (Use Class B8) including 'last mile' distribution close to consolidation centres and collection points

3) secondary materials, waste management and aggregates (SG)

4) utilities infrastructure (such as energy and water)

5) land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure

6) wholesale markets

7) emerging industrial-related sectors

8) flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population

9) low-cost industrial and related space for micro, small and medium-sized enterprises

10) research and development of industrial and related products or processes (falling within Use Class B1b)

11) open storage, building materials.
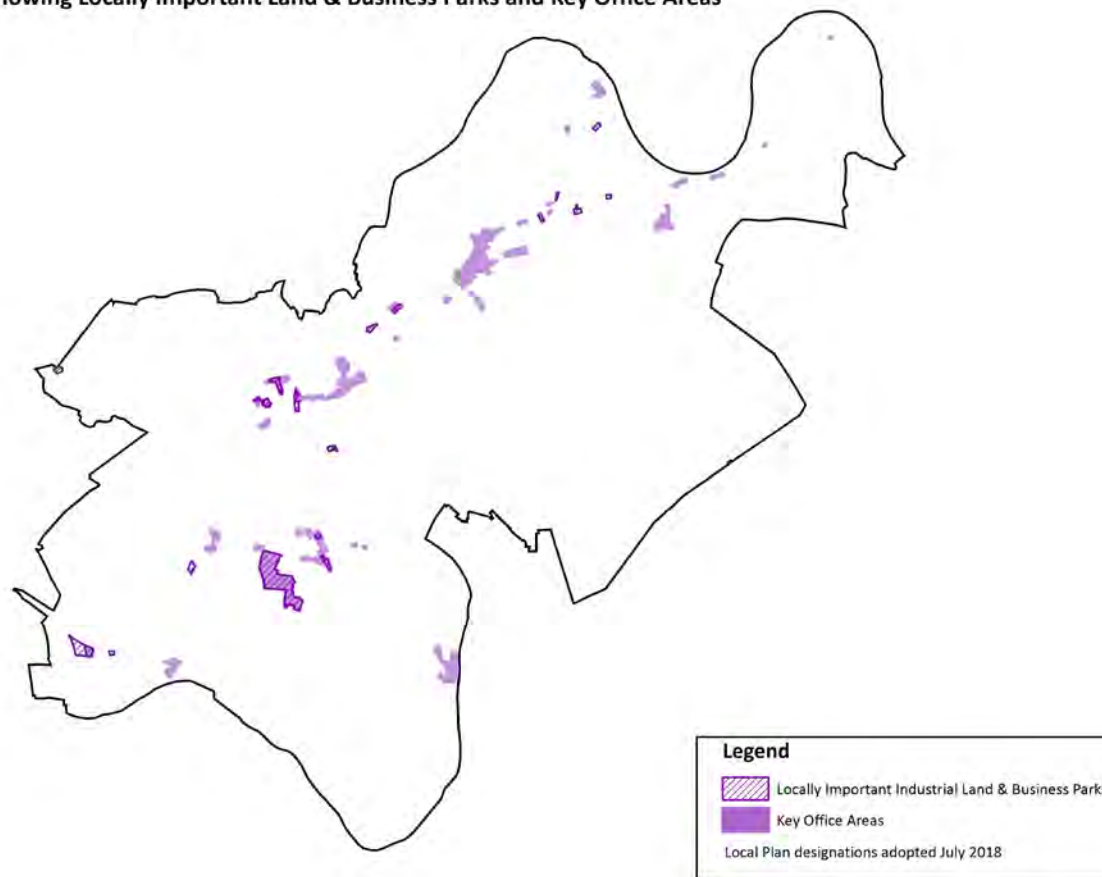
What are we currently doing?

The general presumption against employment land losses is led by the London Plan. Local Plan policies continue to be highly supportive of the protection of employment.

For the first time in the 2018 Local Plan we have identified Locally Important Industrial Land and Business Parks and Key Office Areas in an attempt to protect these valuable assets. There is a presumption against the loss of industrial land in all parts of the borough.

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

We want to encourage the provision and retention of premises suitable for SMEs in the borough to occupy at an affordable cost. The current Local Plan policy

Map showing Locally Important Land & Business Parks and Key Office Areas

Legend

Locally Important Industrial Land & Business Parks

Key Office Areas

Local Plan designations adopted July 2018

seeks to retain as much of the existing office stock as possible through the designation of Key Office Areas, where no net loss of B1 is permitted, and the requirement for the submission of two years of marketing evidence where a change of use away from office is proposed outside these areas.

We introduced in the 2018 Local Plan requirements for the provision of affordable office space on all large commercial space and to promote local employment opportunities and training programmes.

What do we have to find out?

We will undertake in 2020/21 an updated local employment land review, and industrial land audit, to understand the potential for intensification, co-location and substitution on our remaining sites.

The demand characteristics for industrial space has changed over recent years as London has become a service sector provider rather than a manufacturer of goods. In the light of such changes as e-commerce and just-in-time logistics, we believe that the demand for space comes from storage and distribution users. We need to identify the type of demand.

The research that informed the Key Office Area designations was undertaken relatively recently as part of the evidence base work to inform the policy direction in the 2018 Local Plan. As the new Local Plan progresses there will be an opportunity through the employment evidence base to review the existing Key Office Area designations to determine if there are additional areas and sites worthy of designation, to be consulted on at subsequent stages. We also want to ensure that the type of offices that are being encouraged through Local Plan policies reflect those required by SMEs in the borough.

The way in which people work appears to be changing, with an increase in the number of employees who can work flexibly at home, or in cafes or public facilities such as local libraries. This can have a positive effect on reducing the number of people who have to commute for work, especially into central London. There is also a rising demand for serviced and managed workspace for very small or micro-businesses who require flexible and/or co-working space. Further research may assist the Council with identifying the range and type of premises that could be encouraged through Local Plan employment policies, to support these emerging alternative ways of working and ensure the workspace is suitable to meet the needs of the local economy. We need to find out whether the high rents and prices, along with limits on creating new commercial space, such as in the main economic centre of Richmond, is risking that businesses are priced out and placing limits on business growth and productivity.

What do we have to do?

We are considering the following policy directions:

- Establish through future employment evidence base work if further Locally Significant Industrial Sites and/or Key Office Areas should be designated in the Local Plan in order to ensure that sufficient affordable premises are available for a range of businesses, but in particular SMEs.
- Provide further guidance on the types of offices that could be encouraged through the Local Plan employment policies, in particular the types of shared, flexible and managed workspace suitable for start-ups and very small businesses, as well as the publicly-accessible facilities that support those working remotely from their usual place of work, and how this may vary in different locations linked to the spatial strategy.
- Require all development providing economic floorspace to contribute to the provision of affordable, flexible and/or managed workspace to support local enterprise and business development, justifying it is the right type of provision in the right location through the use of Workspace Management Plans, and provide opportunities for local employment opportunities and training programmes.
- Establish the Agent of Change principle into policy, which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development, to ensure that existing businesses and uses do not have unreasonable restrictions placed on them because of the new development.
- Encourage intensification of existing employment sites, particularly industrial land, for further industrial uses rather than substitution by other uses such as residential, following some (but not all) of the principles set out in the new London Plan.

What do you think?

- Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.
- Should we continue to protect our industrial-type uses?
- Should we take a proactive approach and encourage intensification, or adopt a more locally distinctive policy in this regard that focuses less on introduction of residential on industrial sites, but that encourages further industrial / employment uses?
- Should we continue to specify flexible small-scale units suitable to meet local business needs?
- What priority should we give to employment uses over residential amenity if at all? For example a business park may be underutilised due to neighbours' objections to potential transport impacts.
- What type of sites, buildings and facilities are most needed to support the borough's office occupiers, in particular its small and micro businesses, as well as those working remotely from their usual place of work?
- Should we encourage and protect river-related business?

Protecting what is special and improving our areas (heritage, culture and open land)

Heritage

The borough's unique and locally distinctive natural, built and historic and cultural environment is highly valued, and we want to protect what is special and improve our areas for residents, businesses and visitors.

What do we already know?

The borough's exceptional historic environment is central to its character. Many parts of the borough are covered by conservation areas, including the majority of Richmond and Twickenham centres. The borough has approximately 1,115 listed buildings, including some war memorials, four Scheduled Ancient Monuments and 14 parks and gardens that are on the Historic England Register of Historic Parks and Gardens, all of which make a significant contribution to the special character of the borough. The borough is also home to the Royal Botanic Gardens Kew World Heritage Site. Development proposals within the Thames Policy Area should respect and take account of the special character of the reach as set out in the Thames Landscape Strategy and Thames Strategy.

The NPPF considers heritage assets to be an irreplaceable resource that should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Our current policies continue to reflect this higher-level national guidance.

What are the key issues?

When considering the impact of a proposed development on the significance of a designated heritage asset, the NPPF states that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).

Pressure for development linked to population and housing growth may put increasing pressure

to develop on sites in a way that could have an impact on the historic character of the borough. Current policies in the Local Plan require that these applications are carefully managed to ensure that new developments are of an exceptional design, which respond to their local and historic context, in order to make a positive contribution to the historic environment.

What are we currently doing?

The Local Plan policies require new development to conserve and, where possible, take opportunities to make a positive contribution to the historic environment of the borough. Development proposals that are likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The Council will also seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including the borough's list of Buildings of Townscape Merit, which contains many local historic features.

Applicants for proposals that affect designated or non-designated heritage assets are expected to demonstrate how the proposal complies with the relevant Conservation Area appraisals, plans and studies, as well as any other relevant SPD/SPGs adopted by the Council. The level of detail provided should be proportionate to the importance of the heritage asset.

In 2020, we are also embarking on a review of a number of existing Conservation Area Appraisals and Management Strategies, particularly where there is pressure as well as opportunity arising out of development proposals, such as in Richmond town centre.

What do we have to find out?

We think our current policies are working well and they are already drafted to reflect the higher-level guidance in the NPPF and Planning Practice Guidance (PPG).

What do we have to do?

We may need to review the current Local Plan policies to ensure the wording is as tight as it can be and reflects the most up-to-date national policy guidance. This does not mean resisting developments in for example conservation areas, but we need to encourage new developments in areas where they can make a positive contribution to the historic environment. We will therefore proactively identify opportunities for development that can result in improvements to the character and appearance of a conservation area.

What do you think?

- Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.
- Are our current policies strong enough to ensure the ongoing protection of the borough's historic assets?
- Do you agree that we should actively identify opportunities for development and/or redevelopment where these can result in improvements to the character and appearance of existing conservation areas?

Culture

What do we already know?

Top attractions and heritage sites include Hampton Court Palace, Richmond Park, Royal Botanic Gardens Kew, Bushy Park; approx. 4.5 million visitors from across the world every year ; host International Sporting Events; Visitor economy generates an estimated total economic benefit to the borough of £469 million; over 400 voluntary cultural groups in the Borough

What are the key issues?

The cultural sector in Richmond is diverse with a wide variety of types and scales of organisations contributing to a rich and unique patchwork of cultural opportunities for those living in or visiting the borough. These include galleries, museums and libraries, a wide range of arts facilities including arts centres and six theatres, a large number of heritage attractions and historic houses, further and higher education institutions, hundreds of volunteer-led sports and arts clubs and world-class attractions bringing international visitors to the borough including Royal Botanic Gardens Kew (a UNESCO World Heritage Site) and Hampton Court Palace.

The Council's Cultural Partnership Strategy 2015-2019 provides a framework for developing the arts, culture and sport until 2019, aiming to increase participation and develop services with a community focus.

What are we currently doing?

Planning policies encourage proposals in our town centres for leisure, cultural and tourism facilities which contribute to the diversity of the offer. Site allocations for the major attractions of Twickenham Stadium and the Stoop (Harlequins) set out the expectations for the continued use of the grounds for sports uses. Planning policies support the sustainable growth of the visitor economy for the benefit of the local area, and encourage the provision of accommodation to enable visitors to stay longer and spend more.

In line with the Cultural Partnership Strategy, we are facilitating opportunities to widen participation in culture where possible and our goal is to embed culture at the heart of communities.

What do we have to find out?

Update the Council's understanding of future accommodation needs for visitors, including the quantum and need for short term let accommodation in the borough e.g. Airbnb and/or serviced apartments.

What do we have to do?

We are considering the following policy directions:

- Continue to support the sustainable growth of the visitor economy.
- Identify the strategic cluster of cultural attractions in the borough, as directed to by the London Plan.

What do you think?

- Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.
- Are there other opportunities through planning to enhance the cultural offer and widen participation?

Green infrastructure and protecting our open land
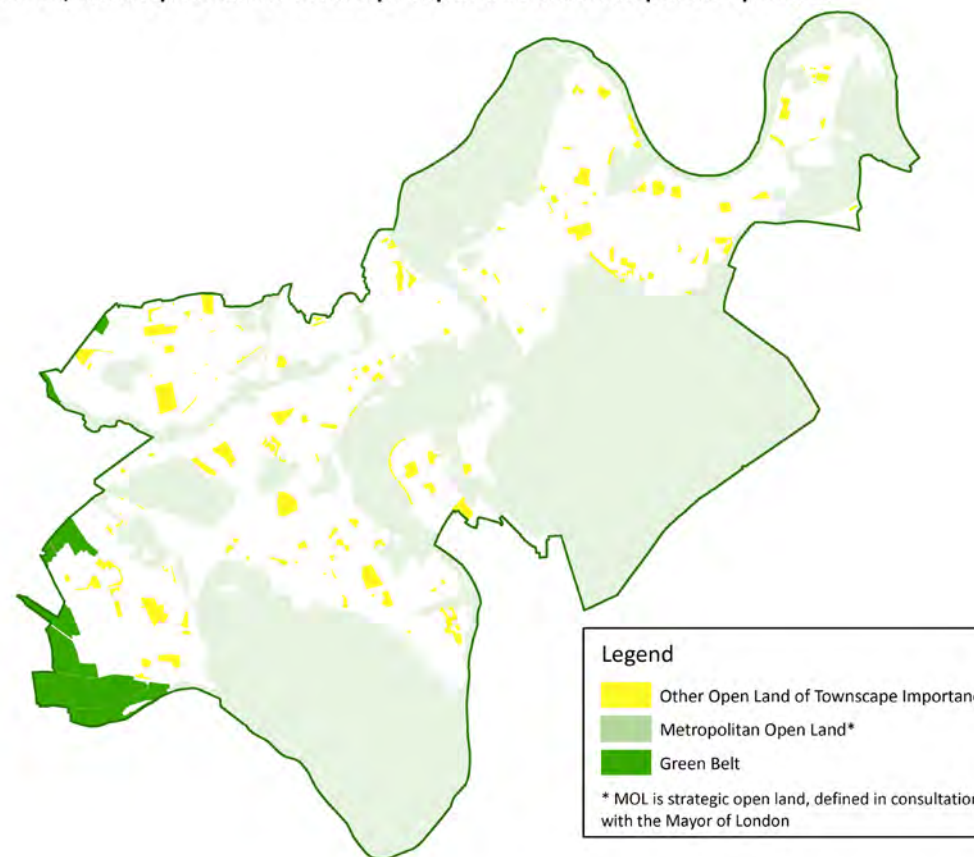
What do we already know?

Richmond borough is characterised by extensive areas of open land, designated as Green Belt and Metropolitan Open Land (MOL), as well as the borough's rivers and their corridors, which link across borough boundaries and have a strategic function in southwest London, Greater London and beyond.

More than half of the borough is designated Metropolitan Open Land and Green Belt, with many areas of local importance being designated as Other Open Land of Townscape Importance. The River Thames is a key asset for the borough, also designated as Metropolitan Open Land.

The natural and historic environment within the context of London is exceptional, with Richmond being the only borough that spans across both sides of the River Thames, with a large number of nationally significant heritage and cultural assets, including the Royal Botanic Gardens Kew World Heritage Site, Hampton Court Palace as well as Royal Parks, Richmond Park and Bushy Park. In total, more than two thirds of the borough are protected by either open land or conservation designations.

The borough's rivers, their banks and surrounding environments contribute to the special and distinctive character of the borough. The rivers are important components of the wider Green Infrastructure network and provide valuable habitats

Map showing Green Belt, Other Open Land of Townscape Importance and Metropolitan Open Land

Legend

- ▨ Other Open Land of Townscape Importance
- ▨ Metropolitan Open Land*
- ▨ Green Belt

* MOL is strategic open land, defined in consultation with the Mayor of London

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

detail in the Thames Landscape Strategy (Hampton to Kew) and the Thames Strategy (Kew to Chelsea).

The borough's Blue Ribbon network contains not only the River Thames, but other important rivers and waterbodies, including the River Crane, Duke of Northumberland River, Longford River and Beverley Brook.

The borough also benefits from highly significant historic landscapes, including those on the Historic England's national Register of Parks and Gardens, all of which make a significant contribution to the borough's green infrastructure network.

There are also many smaller pieces of open land, including land designated as Other Open Land of Townscape Importance (OOLTI), as well as non-designated land, all of which are of value to the local area.

Therefore, the Council places strong emphasis on protecting and, where possible, enhancing the special environment, local character and uniqueness of this borough by recognising the environmental constraints and limits that provide the context for growth which need to be respected.

What are the key issues?

There are threats to these designated areas, particularly from ad hoc development proposals. However, there are also opportunities associated with new development to enhance access and to improve poorer quality areas such that they provide a wider range of benefits, including improved public access

for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage.

The protection of existing Green Belt and MOL is considered to be important in terms of maintaining openness, preserving the setting and character of the area, restricting sprawl, providing opportunities for recreation, playing a major role in the provision of and accessibility to open space and the green infrastructure network, supporting biodiversity, mitigating the impacts of climate change and encouraging more sustainable and healthy living options.   However, there is increasing pressure to provide for and meet our housing and employment needs. Previously, we did not carry out a Green Belt or MOL review because we were able to demonstrate that we could meet the borough's housing target, as set out in the London Plan, without releasing protected open land.

With housing and employment needs increasing, and the likelihood of a substantially higher housing target as part of the new London Plan, there is pressure to review the Green Belt and MOL boundaries to ensure we can come to an informed decision as to how best to accommodate the growth and development needs of the borough.

What are we currently doing?

The NPPF sets out that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their

permanence. On a similar token, the London Plan sets out that the strongest protection should be given to MOL and inappropriate development refused, except in very special circumstances, giving it the same level of protection as Green Belt.

In general, previous policy approaches on Green Belt and MOL have been continued. We are following higher level policies and guidance, and therefore there is a presumption against the loss of, or building on, greenfield sites as well as MOL/Green Belt in this borough, unless very special circumstances and/or an exception to relevant policies can be demonstrated. National policy states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidence and justified, through the preparation or updating of plans. Historically, the Green Belt boundaries have remained unchanged and any pressures for releases of such land have been resisted. The London Plan states that any alterations should be undertaken by boroughs through the Local Plan process, in consultation with the Mayor and adjoining authorities. MOL boundaries have only been reviewed and amended where particular issues were raised on a site specific and case by case basis; however, there has not been any strategic or larger scale MOL review in this borough.

Areas designated as Other Open Land of Townscape Importance (OOLTI) form an important part of the multi-functional network of Green Infrastructure, which are predominantly open or natural in character. This has been a longstanding policy approach to safeguard open land of local importance,

What do we have to find out?

We have never carried out a borough-wide review of Green Belt and Metropolitan Open Land since they were first established and designated several decades ago. The Inspector who conducted the examination into the last Local Plan stated however that a review of Green Belt/MOL boundaries may be necessary during the life of the plan to inform how we best accommodate growth and development needs of the borough and beyond[xii]. In addition, the Panel of Inspectors' report has recently been published in relation to the draft new London Plan[xiii]. This recommends that the Mayor should lead a strategic and comprehensive review of the Green Belt in London as part of the next review of the Plan to establish if there is any potential for sustainable development. In particular, it states that "it is implausible to insist that the green belt is entirely sacrosanct without having considered what it comprises and the impact that it has on wider strategic objectives." The Mayor has declined to accept this recommendation, and stated that any review of London's Green Belt must be as part of a comprehensive strategic appraisal of London's spatial development options that focuses on the most sustainable outcomes.

Given this context, it is important to ensure our evidence remains robust and up-to-date in order to justify the continued protection of such designated land. Therefore, we are committed to carrying out a review of existing Green Belt, Metropolitan Open Land and Other Open Land of Townscape Importance to fully inform our spatial strategy and approach to growth and development in the borough. The reassessment of existing constraints is an important part of the plan process, focusing on whether the designated land still meets the purposes as defined in the NPPF, London Plan and Local Plan. Reviewing such designated land will put us in a much better position at a future Local Plan examination.

A review of designated open land does not necessarily mean that land will be released for development or indeed that sites have to be allocated for development. We consider that the majority of the existing land protected by these designations fulfils the policy requirements and criteria for designation, and we will continue protecting our precious parks and open spaces. There could, however, be a small number of sites or pockets of land that could benefit from a thorough assessment against the relevant policy criteria for designation. In the event that a very small number of sites no longer meet the criteria for Green Belt, MOL or OOLTI respectively, they could potentially be considered for providing land to address our unmet needs for affordable housing or for social and community uses. We are committed to being open about this process. We will take a transparent approach, based on a methodology to be consulted and agreed prior to undertaking such a review of designated open land. Any site-specific changes will be made clear in future consultations for anyone to comment.

Before concluding that exceptional circumstances exist to justify changes to any boundaries, the Council will need to be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This review will therefore form one of the evidence base studies, which will help to identify the best and most sustainable sites for future development in the context of the London Plan's housing target, and in particular may consider capacity to meet the priority for affordable housing needs.

What do we have to do?

We are considering the following policy directions:

- Continue to resist the inappropriate loss of the Green Belt, MOL, OOLTI and open spaces, and support proposals to enhance access as well as the quality of these designated open spaces.
- Carry out a strategic and borough-wide Green Belt and MOL review, also incorporating OOLTI designations. The methodology for Green Belt and MOL will be agreed with our duty to co-operate partners. The findings will help us to consider whether the current designations still meet the criteria as set out in national policy, London Plan and Local Plan, being mindful that land could be deliberately neglected by landowners to devalue its protected status.
- If there are exceptional circumstances that justify changes to Green Belt or MOL boundaries, ensure that all other reasonable options for meeting identified needs have been assessed, including making as much use as possible of suitable brownfield and underutilised sites; optimising the density of development, particularly in town centres and locations well served by public transport; and agreeing the approach with neighbouring authorities and the Mayor of London.

What do you think?

- Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.
- Do you agree that the MOL and Green Belt boundary review should also incorporate a review of designated Other Open Land of Townscape Importance?
- Are there any sites that you would like to be identified for designation as 'Local Green Space'?

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 accordance with the NPPF. If sites are suggested to the Council for designation as Local Green Space, the Council will then undertake a robust analysis of such sites against the criteria of the NPPF and objectively assess sites in relation to, for example, beauty, historic significance, recreational value etc. to consider whether this designation could be applied.

Increasing biodiversity and the quality of our green spaces, and greening the borough

What do we already know?

The World Wide Fund for Nature revealed that population sizes of wildlife decreased by 60% globally between 1970 and 2014.

The Richmond Biodiversity Action Plan 2019 sets out the priority species for the borough.

What are the key issues?

- Shortage of available land for development in the borough potentially puts pressure on existing green space to be developed, a pressure which has generally been resisted

- Increasing usage of existing green space and parks and the need to protect from over use (see above in relation to key issues for the overall spatial strategy)
- The social value and benefit of access to parks and open spaces upon the health and wellbeing of our population
- The borough has the largest amount of public open space per head of population of any London Borough, which is hard to maintain in terms of effort and cost
- More than two thirds of Richmond are protected by either open space or conservation area status, contributing to the issue around this borough having the highest land values of any outer London borough
- Green and open spaces – planned, designed and managed as green infrastructure – provide a wide range of social, health and environmental benefits. Connectivity across the network of green and open spaces is particularly important as this provides opportunities for walking and cycling and for improving wildlife corridors.
- Need to tackle the climate emergency and recognise the contribution that urban greening can make to this. Urban greening covers a wide range of features including, but not limited to, street trees, green roofs, green walls, and

rain gardens. It can provide a range of benefits including amenity space, enhanced biodiversity, addressing overheating and the urban heat island effect, improving air quality, sustainable drainage and amenity.)

- The diminishing quality of the green space provided and a lack of linkages to Green Infrastructure should be avoided.
- Increasing population and the need for appropriate green spaces for well-being and mental health.
- The paving over of front gardens and reduction of areas of amenity grass land.
- Loss of back land and back gardens and their significant contribution to biodiversity and green linkages.

What are we currently doing?

Richmond Council's strategic principles and policies for the protection and enhancement of nature conservation in the borough are set out in the Nature Conservation Policy Statement of 2019. There is a particular emphasis on maintaining and improving biodiversity and wildlife habitats. www.richmond.gov.uk/media/17991/nature_conservation_policy_statement.pdf

All development proposals are required to protect and if possible, enhance green spaces and green features.

Existing Local Plan policies also seek to protect and enhance the borough's biodiversity, encourage the protection and provision of trees as well as

Biodiversity in the London Borough of Richmond upon Thames

The Biodiversity Action Plan sets out the framework for the protection, conservation and enhancement of wildlife within Richmond upon Thames. The list of habitats and species in the plan is not exhaustive, but aims to concentrate on those habitats and species, which are rare, in decline, or are characteristic of Richmond. This leaflet only gives a snapshot of selected habitats and species; and the map shows their locations.

PRIORITY HABITATS
Ancient and veteran trees
Broadleaved woodland
Hedgerows
Lowland acid grassland
Neutral grassland
Private gardens
Reedbeds
Rivers and streams
Tidal Thames

PRIORITY SPECIES
Bats
Native black poplar
Hedgehogs
House sparrow
Song thrush
Stag beetle
Swift
Tower mustard
Water vole
White-letter hairstreak and Elm
Pollinators

Source: Richmond Biodiversity Action Plan Summary Leaflet

the retention of important landscape features. The Council also promotes green roofs and green walls.

What do we have to find out?

We will be reviewing the borough's designated sites of importance for nature conservation (SINCs), including identifying potential new SINCs for designation. Note that sites of nature conservation importance are currently designated as "Other Sites of Nature Importance" in the existing Local Plan. We may take the opportunity to review the existing OSNI designation to bring this in line with the SINCs.

We will carry out further research in relation to the practicalities of implementing a biodiversity net gain requirement, and how we could incorporate such a requirement for all our developments. In this regard, we may consider a matrix system or have a banding system for more simple schemes such as rear / side extensions.

What do we have to do?

The decline in UK habitats and species makes reversing past losses an imperative, not just in terms of the benefits to wildlife but also in terms of economic and social benefits. We will seek increases in sizes of relatively common species populations and not just those of protected and rare species.

Biodiversity net gain is development that leaves biodiversity in a better state than before.

Biodiversity net gain requires developers to ensure habitats for wildlife are enhanced and left

in a measurably better state than they were pre-development. They must assess the type of habitat and its condition before submitting plans, and then demonstrate how they are improving biodiversity – such as through the creation of green corridors, planting more appropriate trees, or forming local nature spaces. Habitats and species need to be identified that are appropriate to the location and the problems that need to be addressed. For example, Oak trees may offer an excellent wildlife habitat, but they emit ozone, whilst Silver Birch trees absorb it. Green improvements on site would be encouraged, but in the rare circumstances where they are not possible, developers will need to pay a levy for habitat creation or improvement elsewhere. We will need to explore what very special circumstances we would accept before this becomes a "get out clause "for developers.

The government plans to introduce a new statutory requirement for Local Nature Recovery Strategies. These strategies will help to map out important habitats and opportunities for the local environment to be improved, linking communities' knowledge and priorities with national environmental objectives. To date, there is no such strategy for London.

We will collaborate with local nature groups (such as the Richmond Biodiversity Partnership and SWLEN) and similar partnerships working to conserve wildlife who are a useful source of information for existing ecological networks. Local ecological networks can be identified and mapped as a part of the plan-making process, with policies identifying appropriate levels of protection and opportunities to create, restore or enhance habitats or improve connectivity. Local ecological networks can make a significant

contribution to developing the Nature Recovery Network.

The emerging new London Plan requires new developments to "wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity. In addition, it expects boroughs to develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The Mayor sets out in his policy what the UGF should be based on, but that it should also be tailored to local circumstances. The Mayor's UGF model is intended to be only applied for major applications. The draft London Plan makes recommendations on the generic UGF model and target scores, but leaves it up to local authorities to develop their own bespoke approach to the UGF and scores, based on local circumstances. The UGF works as a multiplier, so for example a green roof may be given a value of 0.8 and a green wall a factor value of 0.6.

We are considering the following policy directions:

- Continue to protect designated sites and other areas of importance for biodiversity conservation.
- Continue to safeguard protected species and priority species, including those listed in local biodiversity action plans.
- Promote avoidance and mitigation to reduce harm to sites, habitats and species of importance to biodiversity conservation and provide

compensation for those unavoidably lost as a result of development.
- Seek to encourage an increase in sizes of relatively common species populations where their populations have fallen greatly, and not just those of protected and rare species.
- Retain, create and enhance features of importance for biodiversity conservation where appropriate.
- Require net gains for biodiversity through planning policies and explore the potential approaches as to how this can be required and practically implemented on site.
- Continue with the existing policy to retain and protect existing trees. Continue and further refine if necessary, the existing approach to requiring a financial contribution to provide an off-site street tree using the CAVAT methodology where a tree is felled or damaged. Ensure appropriate tree species to the location, considering biodiversity and adaptability to climate change.
- Planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.
- Protect green and open spaces through the use of appropriate designations and policies and consider the introduction of buffer zones for sites with importance for nature conservation.
- Enhance green and open spaces to provide a wider range of benefits for residents. Examples could include improved public access for all,

inclusive design, recreation facilities, habitat creation, landscaping improvement or flood storage.
- Ensure that future green and open space needs are planned for in areas with the potential for substantial change and support the creation of new publicly accessible green and open space in areas of deficiency
- Develop a bespoke Urban Greening Factor model for the borough, with scores that are appropriate in the context of this borough, rather than relying on a London-wide UGF model.

What do you think?

- Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.
- Do you agree with our overall policy directions for protecting and enhancing our biodiversity as well as recognising the contribution that green infrastructure and urban greening make to tackling climate change?
- Do you agree that we should develop our own Urban Greening Factor model rather than relying on the generic London-wide model?
- Do you agree with the introduction of the biodiversity net gain requirement, and if so, do you have any suggestions on how this can be secured?

Improving design, delivering beautiful buildings and high–quality places

What do we already know?

The communities within the borough have their own unique and distinctive character and are some of the best places to live in London as a result of the quality of the built environment.

There is increasing need and pressure to facilitate development including residential and employment uses in this borough.

What are the key issues?

- Maintaining a design led approach to deliver the borough's housing target(s)
- Ensuring new developments contribute positively to the character of the townscape and reinforces local distinctiveness
- Identifying appropriate locations for Tall Buildings and areas with urban capacity to enhance our existing built environment.
- Ensure that design requirements allow for locally responsive design; in particular ensuring new developments respond to the needs and aspirations of the borough's unique and distinctive areas, by taking account of how places look and feel, including the interaction of buildings and how they sit within a wider context.
- Government launched in September 2019 national guidance to provide more substance to the definition of 'good design', covering the principles / characteristics of good design, which can be used to create physical character, sustain a sense of community and work to address climate change. This Guide does not attempt to establish a 'one-size-fits-all' approach to design for the whole country, instead, it encourages the preparation of Local Design Guides and Design Codes.

What are we currently doing?

The Local Plan policies require all development to be of high architectural and urban design quality. This includes assessing a development with its compatibility with local character including the relationship to existing townscape, development patterns, views, and frontages as well as scale, height,

massing, density, landscaping, proportions, form, materials and detailing.

Heritage assets including listed buildings and Conservation Areas have been identified, along with historic parks, the Royal Botanic Gardens Kew World Heritage Site, which are protected and enhanced under the Local Plan.

Development is further guided by a whole raft of Supplementary Planning Documents (SPDs), including on House Extensions and External Alterations, and Design Quality.

Amenity impacts to neighbouring properties are also considered during development with the application of the agent of change principle. This ensures that the individual or business introducing a new land use is responsible for managing the impact of that change. This not only applies to a new use in a residential area but when a residential use is introduced in a commercial/ light industrial area. There are detailed Local Plan policies to minimise any harmful and adverse environmental impacts of development, considering pollution, air quality, noise and construction management.

The Richmond Design Review Panel (RDRP) has been set up by Council with the aim of raising the standard of design quality in the borough. It is an independent body whose members are skilled in architecture, planning, landscape architecture, urban design, engineering, transport planning and heritage conservation. The RDRP undertakes a design review of proposals on matters such those which involve 10

The ten characteristics of well designed places

Source: National Design Guide (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf)

or more residential units, non-residential floorspace of 2,500m2 and above, all tall building proposals and significant public realm schemes.

What do we have to find out?

- Understand the context to identify locations where tall buildings and/or high density development may be appropriate to produce a positive framework for development in consideration of the emerging London Plan housing target;
- Map the borough's capacity for growth which clearly identifies where there is opportunity for growth and where there are significant constraints (e.g. flooding)
- Understand the changes under new permitted development rights as they have the ability to impact on high quality places.

What do we have to do?

We are considering the following policy directions:

- Set out clearly the broad design expectations, including using design reviews as one of the tools providing a means of promoting good design.
- Undertake an Urban Design Study which identifies local context and then locations in the borough which have the capacity of development as well as their suitability to accommodate Tall Buildings. It will also review the built form of previously approved and constructed developments to understand how well our policies are facilitating high quality places.
- Better utilise the skills and expertise of the

RDRP by directing more planning applications to undertake a design review that is proportionate, and ensure their recommendations are clear and given the necessary weight when they are assessed for planning permission.
- We will consider preparing Richmond borough's own design guide, reflecting its unique setting, character and history.
- Develop effective place making strategies with the aim of strengthening the connection between people and the physical places they share. This includes shaping our public realm in order to maximise its shared value (i.e. the physical, cultural and social aspects of a place).
- Monitor updates and information provided about new permitted development rights.
- Continue to ensure the local environmental impacts and impact on amenity of all development proposals are addressed, as part of well-designed new development.

What do you think?

- Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.
- How should the Urban Design Study identify areas for change and locations where tall buildings and/or high density development may be appropriate?
- Should design review be embedded as one of the policy tools to inform determination of planning applications, and what other tools may be useful to assess the design quality of proposed schemes?

- Should we develop our own borough-wide design guide to assist delivering high quality design, and what are the local areas' qualities and opportunities?
- Do you have any views as to how the design and development of homes could address different lifestyles, abilities and stages of life, including an ageing population?

Reducing the need to travel and improving the choices for more sustainable travel

What do we already know?

Richmond's Climate Emergency Strategy (2020) recognises that transport was the largest emitting sector of UK greenhouse gas emissions in 2017. The Council has a role to play in influencing the behaviour of residents in the borough and encouraging 'modal shift' away from the highest emitting forms of transport towards the lower emitting forms of transport where possible. We want to make it easier for people to choose sustainable forms of travel as their preferred mode of transport, and make use of new systems and technologies, to reduce car dependence. However, we also acknowledge that there may always be trips that are

better suited to cars, and there will be a variety of people within the borough who will continue to rely on cars to undertake trips that some others may be able to take by other means. Where opportunities arise, particularly in major development schemes, we want to embed car-free or car-lite lifestyles from the outset. (Car-lite developments are those that make provision for disabled parking, deliveries and car club parking only)

Long term planned strategic transport developments including improved surface access to Heathrow airport and Crossrail 2 will likely lead to an increased number of people travelling through and interchanging in the borough on to other forms of public transport. Although Crossrail 2 may result
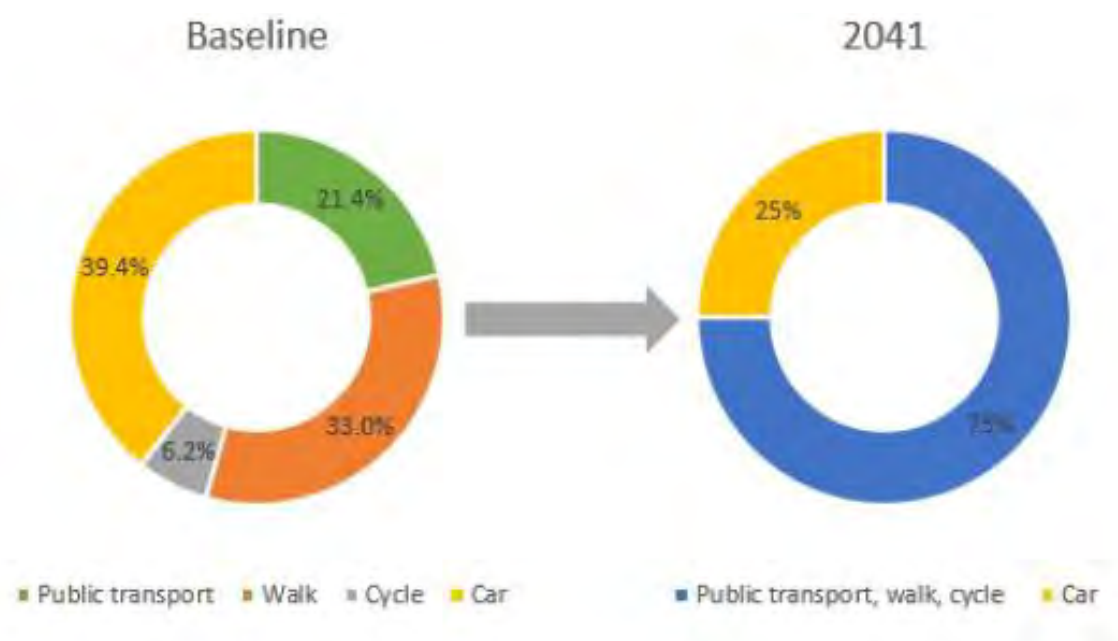
in additional train services in certain parts of the borough, it will be a challenge to ensure that connecting journeys are made by public transport, walking and cycling and that the impact of additional road journeys is minimised.

The Mayor of London's Transport Strategy 2018 envisages a modal shift of 80% of journeys being made by foot, cycle or public transport by 2041, which would involve achieving mode shares of 95%, 90% and 75% in central, inner and outer London respectively. These figures compare to 90%, 80% and 60% in those parts of London in 2015. The greatest change in travel behaviour will need to be made in outer London, where around one third of all trips are made. A range of interventions including healthy

streets, more restricted car parking and transport schemes will need to be delivered to achieve these outcomes.

Earlier this year the Council adopted a new Local Implementation Plan (LIP 3), featuring the headline target from the Mayor of London's Transport Strategy for 75% of all trips to be undertaken by sustainable modes (walking, cycling and public transport) by 2041. On a local level this will require a 14% mode shift from a baseline of 61%. The plan also includes targets for expanding the cycle network, improving air quality, reducing road danger and increasing the use of public transport. The Local Implementation Plan recognises the challenges and opportunities for achieving this level of mode shift in the borough. While many parts of the borough have a high-quality public realm, which encourages walking and cycling, there are other areas with limited access to public transport and high car ownership levels. Increasing the mode share for walking and cycling by improving levels of inclusive access provides the best opportunity for decreasing car use in the borough.

Many areas of the borough are reliant on the bus network and low frequency train services for public transport. The number of public transport trips per day by borough residents has remained relatively static since 2011/12. The borough has seen a 1% increase in bus capacity utilisation between 2014/15 and 2017/18, whereas nearly all other London boroughs have seen a decrease over this period (including a 3% decrease in Hounslow and 2% decrease in Kingston). This is indicative of the borough's high reliance on the bus

Baseline and target mode shares (Source: London Borough of Richmond upon Thames Third Local Implementation Plan – mode share diagram on page 17)

network. TfL sets the bus routes and frequencies for all of London. The borough would benefit from additional bus routes, and increased frequency on many existing routes. This would increase the attractiveness of public transport for journeys both within the borough and to neighbouring boroughs and help reduce reliance on the car. In the short term, increasing public transport use will be best achieved by improving the whole journey experience, which will include enhancing walking and cycling connectivity to existing bus stops and stations.

New Local Plan policies will need to align with the objectives of the borough's draft Active Travel Strategy which has been developed to provide detail on how we will support increased local walking and cycling trips. Making the best use of our streets means prioritising the needs of sustainable travel users above others. Our focus is on supporting space efficient, non-polluting modes of travel that support a healthy community. The hierarchy of street users is as follows:

- Pedestrians and people with disabilities and/or limited mobility
- People cycling
- Buses
- Zero and low emission delivery and servicing vehicles
- Zero and low emission cars, motorcycles, mopeds and taxi and private hire
- Polluting cars, motorcycles, mopeds and taxi and private hire

The draft Active Travel Strategy refers to TfL's Walking Action Plan is focused on encouraging walking through the following four themes:

- Building and managing streets for people walking
- Planning and designing for walking
- Integrating walking with public transport
- Leading a culture change

The borough of Richmond has the highest combined levels of walking and cycling in outer London

(38.4%) and the potential to achieve even more. The borough also has the highest proportion of residents achieving a healthy level of activity through travel of any outer London borough, with 40% of borough residents currently doing at least 20 minutes of active travel each day. The key barriers to walking include time constraints, high traffic levels and cars travelling too fast. Personal security concerns, non pedestrian friendly streets, a lack of fitness and having another preferred mode of travel are also common reasons not given for walking. Issues relating to the lack of connectivity can be a major obstacle in many parts of the borough due to rivers, railway lines, busy roads and open spaces that may be difficult to travel through or across. As a pedestrian or cyclist, it can be particularly challenging to make journeys across the river Thames due to the limited number of accessible and suitable bridges in the borough.

TfL's Cycling Action Plan has targets to increase the number of trips made by cycling and to expand the cycle network to reach more Londoners. Richmond has the highest level of cycling in outer London, and features some of the roads with the highest levels of cycling in greater London. In many locations these cycling levels are achieved without specific supporting infrastructure. Cycling flows are highest on the route between Teddington and Twickenham and Richmond town centres and in the east of the borough. Cycling numbers are lower in the west of the borough, although many routes are still in the top 20% for current cycling levels, including Hampton Hill to Twickenham via Twickenham Green. TfL have

combined existing and potential flows to create a prioritised list of potential routes across greater London, which as subsequently informed proposals for a strategic cycle network in the borough.

Planning can play an important role in encouraging active travel by ensuring that high trip-generating development is located in the most accessible locations, that developments make provision for modes other than the car, for example through the provision of good pedestrian facilities, clear layout and signage, provision of cycling facilities and improving access and connections to public transport interchanges.

It is recognised in the draft Active Travel Strategy for Richmond that access to public transport varies across the borough with certain areas, particularly Richmond and Twickenham, being well served by both rail and buses, while other parts have no nearby rail stations and intermittent buses. All trips by public transport include elements of walking and cycling at the start and end and providing strong links to public transport is pivotal in encouraging its use for longer trips.

What are the key issues?

- Need to reduce the reliance on the private car for journeys, focusing on walking and cycling as the natural choice for undertaking local trips, including accessing local shops and town centres, travel to school and connecting to public transport (bus stops and stations).

- Promote connectivity by tackling the connectivity issues that can be a major obstacle in many parts of the borough due to rivers, railway lines, busy roads and open spaces that may be difficult to travel through or across.
- Prioritising improvements to local walking and cycling routes around bus stops and rail stations and ensure that these are well-connected with routes to and from new developments.
- Consider how to improve the accessibility and experience of crossing the river for pedestrians and cyclists of all abilities, including opportunities for upgrading existing crossings (bridge and ferry), and investigate the possibility of an footbridge across the Thames between Ham and Twickenham for pedestrians and cyclists of all abilities.
- Consider if/where there are opportunities to work with TfL to make improvements to the existing bus network, particularly where this is related to the location of new developments.
- Consider the impact of current levels of car and cycle parking provision in new developments, and whether standards could be reduced/raised to encourage lower levels of car ownership in the borough.
- Consider if/how car-free and car-lite developments could be delivered in the borough, including in areas with lower PTAL ratings.
- Current availability of parking spaces in the borough's centres and contribution over-provision may make to encouraging private car use/discouraging active travel.

- Using new technologies to travel smarter and more sustainably.
- Embracing stricter emissions standards to reduce air pollution and improve public health.

What are we currently doing?

The current Local Plan seeks to minimise the impacts of development in relation to congestion and air pollution. Transport has a significant impact on air quality in the borough, with many areas experiencing levels of pollution above national set target levels. Consequently, the entire borough is designated an Air Quality Management Area.

The borough has high levels of car ownership and use within fairly densely developed residential areas with some narrow streets and many older houses without off-street parking. This has led to high levels of on-street parking, worsened in areas where there is a demand for commuter parking. The current policy approach aims to ensure that sufficient on-site car parking is provided to meet the needs of the occupiers of new developments, but also to ensure that excessive on-street parking demand is not created which could have an adverse impact on local highway/traffic conditions, street scene and impacts on making the best use of land. This impact would normally be managed by restricting access to parking permits for new residents of developments in Community Parking Zones (CPZs).

New development is expected to demonstrate its sustainable credentials in accordance with the transport policies set out within the Local Plan, the Council's Local Implementation Plan and the Council's emerging Active Travel Strategy. It should provide high quality walking and cycling permeability, and connectivity with the surrounding highway and transport network. Depending on the scale of the development, developers may be expected to:

- meet the costs of upgrading the surrounding highway network and connectivity to public transport to mitigate the impact of development and promote safe and sustainable travel to the location;
- require contributions to be made to meet the costs of providing or upgrading public transport necessary to make development acceptable;
- demonstrate how areas of public realm will be managed and maintained;
- help facilitate transport schemes and programmes being promoted by the Council or its partners, including those schemes and programmes within the Council's Local Implementation Plan and Mayor of London's Transport Strategy.

What do we have to find out?

Inclusive access and connectivity

We know that improvements could be made to current levels of inclusive access and connectivity in certain parts of the borough to encourage more walking and cycling and reduce reliance on private car use for local journeys, particularly when accessing

local facilities, town centres and public transport interchanges. We need to better understand where these areas of limited inclusive access connectivity are, and how higher levels of walking and cycling could be encouraged through the planning process, including where it relates to connecting new developments with their surrounding area.

Parking standards

The current Local Plan has adopted London Plan car parking standards for the borough, with the exception of those areas with very low levels of public transport accessibility (PTAL 1 and 2). We could choose to adopt the lower London Plan parking standards for new developments in these areas, but this may have consequences such as increasing demand for the limited on-street parking spaces.

Car-free and car-lite development

Car-free and car-lite development would not normally be considered appropriate in low PTAL areas, however further work could help us to understand what measures could help deliver this type of development across the borough (for example extending CPZs to all areas).

Cycle parking and cycling infrastructure

The borough has adopted the London Plan standards for cycle parking, however we have identified areas where more cycle parking is desirable, given the number of journeys that have been calculated as potentially being transferrable to bike. Further

work is required to understand what an appropriate (higher) cycle parking standard for the borough might be. New developments may be able to link in with and contribute to the development of the borough's strategic and local cycling networks to encourage greater levels of cycling.

Car share facilities, car clubs and electric vehicle charging points

Is there scope for additional facilities to encourage lower private car and polluting car use?

Car parking provision

Could levels of public car parking provision be reduced/minimised in the borough's centres to encourage active travel and use of public transport? This may also have the benefit of releasing some sites, or parts of those sites, for redevelopment for affordable housing and/or social infrastructure uses.

What do we have to do?

We are considering the following policy directions:

- Adopting London Plan residential parking standards for all areas of the borough, including those with a low PTAL.
- Encouraging and allowing car-free and car-lite developments in areas of the borough with lower PTAL ratings if connectivity to public transport is improved and active travel can be encouraged, for example through improvements to the public realm and/or creation of new walking and cycling routes.

- Adopting cycle parking standards that are higher than the London Plan, to reflect local circumstances.
- To align with other council strategies, new developments, depending on their scale, may be expected to link with and contribute to the development of strategic and local cycle networks.
- Reviewing parking provision in the borough's town centres to determine if current levels of public parking could be reduced and the potential impact of this (for example on the borough's retailers).

What do you think?

- Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.
- What measures need to be put in place if the Council is to support car-free and car-lite development in areas with currently lower levels of access to public transport?
- What additional facilities does the borough need to support greater levels of walking and cycling?
- If the availability of parking in the borough's town centres was less than it is now, would it encourage you to walk, cycle or use public transport more?
- Should the Council actively pursue alternative uses (such as for much needed affordable housing, employment space and/or social and community infrastructure uses) on its existing car parks in town centres?

Securing new social and community infrastructure to support a growing population

What do we already know?

We need to consider the impact of the growing and changing population, as we have already mentioned.

Between 2010/11 to 2015/16 there was a net increase in floorspace in social or community use of 31,700m2, just over half of this figure being in educational floorspace due primarily to school expansion.

At the October 2019 pupil census, there were 2,007 children in Year 7. That figure is forecast to increase to 2,163 in September 2025 (London Borough of Richmond upon Thames School Place Planning Strategy, December 2019).

What are the key issues?

Social and community infrastructure covers a wide range of facilities which provide for the health, welfare, social, education, spiritual, recreational, leisure (including indoor sports) and cultural needs of the community. Such facilities are important to the community and are essential to supporting health and wellbeing throughout our lives as well as being critical for social cohesion. Access for all groups is important. Some services are statutory, such as the provision of schools, others are provided by partners including voluntary groups or by the private sector.

We need to work closely with our partners to identify and meet people's needs.

Development pressures and high land values in the borough mean there is pressure to redevelop sites and it can be difficult to find new sites for community use, especially for use by voluntary groups. There is an increasing need for nursery, education and health provision across the borough. A key challenge continues to be how to provide enough school places for a growing population in the right place and at the right time.

We recognise that the way some social and community infrastructure is being provided is changing, with flexible spaces to enable shared use, meanwhile uses, to reflect changing needs.

What are we currently doing?

Local plan policies generally support the provision of new social infrastructure floorspace where it meets an identified need and resist the loss of existing facilities unless it can be clearly demonstrated that they are not needed, are being adequately re-provided elsewhere and that the existing space cannot be used for another social infrastructure use of some kind.

The borough is well known for its excellent schools and higher educational facilities. A specific policy on education and training supports the provision of educational facilities including pre-school provision and training. As sites are hard to find, the policy recognises the need to make the most of existing sites and safeguard land and buildings already in educational use. Local Employment Agreements are encouraged for larger schemes to help to promote local employment opportunities and training.

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

Policy seeks to protect and enhance public open space, play space as well as formal and informal sports grounds and playing fields / playing pitches. When certain larger developments are proposed (as defined in policy), applicants are required to assess the impact of the development on Public Open Space provision, assess whether there is sufficient play space and playing fields and make provision where necessary. For each, where inadequate provision exists and it is not possible to provide on-site provision, site specific mitigations will be secured. Contributions may be required to provide or to improve or enhance existing facilities.

What do we have to find out?

We need to work with our partners to provide a robust evidence base to ensure that people's needs are met by feeding into and supporting the work of colleagues and partners with the responsibility for service provision, including within the Council:

- school place planning,
- the Joint Strategic Needs Assessment (JSNA),
- the Infrastructure Delivery Plan/Statements
- the Cultural Partnership Strategy,

and also in conjunction with our partners, being mindful of the estate strategies of for example, government departments, health bodies and the Metropolitan Police. This will include considering people's needs, such as the implications of an ageing population.

In line with a new national requirement, the Council has to produce an Infrastructure Delivery Statement by December 2020 to identify infrastructure needs, the total cost of this infrastructure, anticipated funding from developer contributions, and the choices we have made about how these contributions will be used. We will need to produce, commission or review specific research on the following:

- an Indoor Sports Facility Needs Assessments
- a Playing Pitch Assessment
- a Playing Pitch Strategy
- an Open Space Assessment (referred to elsewhere in this document)

What do we have to do?

We are considering the following policy directions:

- Continue to support the provision of new social infrastructure where it is needed.
- Continue to have firm policies to resist the loss of existing facilities, and to require the site to be considered for other types of community facilities before being released for other uses.
- Continue to support the need for flexible buildings which can be used by different users and deliver inclusive access.
- Continue to protect and where possible enhance existing land and facilities for sport and playing fields, to protect Public Open Space and to provide enough play space.
- Allocate sites for social and community uses to meet need identified by the Council's research and its partners, with the aim to provide facilities

within easy walking distance of people's homes. Explore opportunities to make use of the Council's assets and work with other public sector landowners to enable new social and community infrastructure provision.

- Continue to ensure that the impact of large new development is assessed, so that the impact of additional burdens on existing facilities is mitigated.

What do you think?

- Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.
- Is there a need for a particular type of community facility in your local area?
- What is the best way to provide enough school places for our growing population?
- Should we encourage more community uses in borough centres? Should they be encouraged as part of larger or mixed use developments?
- Should there be increased public access to school facilities?

Creating safe, healthy and inclusive communities

What do we already know?

Life expectancy is high and rates of premature mortality are lower than other areas.

67.1 Total crime rate per 1000 population during 12 month (Apr-17 - Mar-18).

Obesity statistics.

What are the key issues?

We want to continue to achieve healthy, inclusive and safe places. Healthy choices are

influenced by our environment, communities and wellbeing. As a health and care system we are moving beyond a focus on individual behaviour towards a wide range of social and environmental interventions

to improve the health of the population and reduce preventable

diseases, and where proactive early intervention will prevent more serious consequences.

Health and care organisations work closely together through the Health and Wellbeing Board. The Joint

Prevalence of obesity more than **doubles** between reception and year 6

61% of 15 year-olds in Richmond are sedentary for over 7 hours per day

Highest in London for 15-year-olds **drunk** in the previous month (25%), tried **smoking tobacco** (36%) and **cannabis** (19%) and **multiple risky behaviours** (22%)
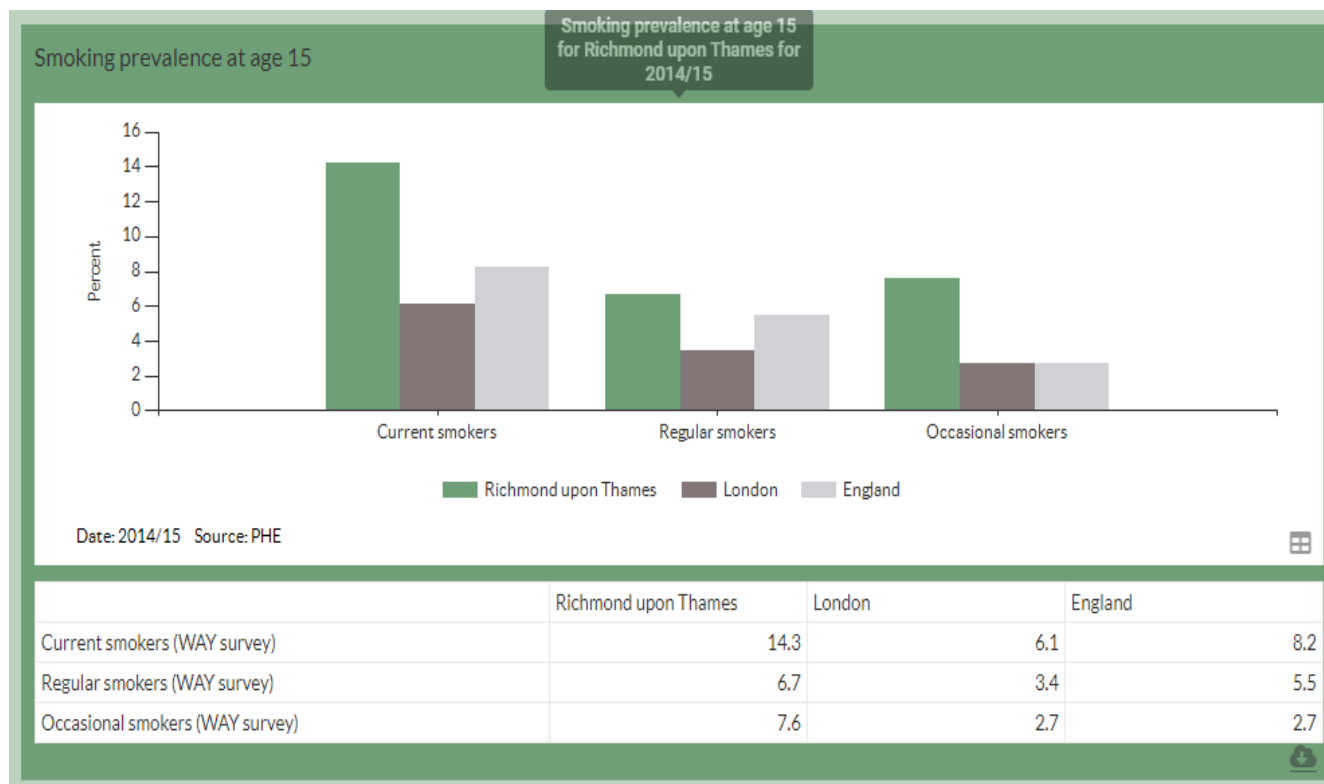
Image from www.richmondccg.nhs.uk/wp-content/uploads/2019/09/NHS-Richmond-Health-Care-Plan.pdf. (Source London Borough of Richmond upon Thames Health and Care Plan 2019-2021)

Health and Wellbeing Strategy 2016-21 focuses on the prevention and joined-up services throughout people's lives, to enable all residents to start well, live well and age well.

The Richmond Clinical Commissioning Group (CCG) is responsible for the planning and commissioning of healthcare services in the borough. The CCG works closely with NHS England to deliver primary care services. Research shows that there is pressure on health facilities across the borough, particularly a shortfall in GP floorspace and need for greater provision of pharmacy services. We need to safeguard land and buildings currently in use as health facilities and meet the future needs of a growing population.

A key purpose of existing plan policy is to address the increasing health inequalities and wider factors which impact on health and well-being. The role of planning is crucial in creating environments that enhance health and well-being, albeit that planning is part of the solution. We are fortunate that approximately 40% of the borough's land area is publicly accessible park[xiv]. 28% of residents use outdoor space for exercise and health reasons, which is the second highest in London[xv]. Planning can help to improve access to these unique and valuable facilities and increase participation in sport and physical activity for all sections of the population (as also set out under the theme of new social and community infrastructure). 19% of people in Richmond do not take part in any physical activity[xvi].

Smoking prevalence at age 15

Smoking prevalence at age 15 for Richmond upon Thames for 2014/15

Date: 2014/15   Source: PHE

	Richmond upon Thames	London	England
Current smokers (WAY survey)	14.3	6.1	8.2
Regular smokers (WAY survey)	6.7	3.4	5.5
Occasional smokers (WAY survey)	7.6	2.7	2.7

Promoting healthy lifestyles in a cross-cutting theme with links to several policies in the Local Plan, to other Council strategies and those produced by the Mayor and government. The Mayor's Healthy Streets Approach aims to improve health and reduce health inequalities, which will help use cars less, and walk, cycle and use public transport more. The Joint Strategic Needs Assessment (JSNA) continues to identify health inequalities and the high proportion of unhealthy lifestyles.

Of course, there are many factors which have the potential to affect a person's health. In this borough, some of the most significant issues include:

• Air quality – the whole borough has been declared an Air Quality Management Area because it has exceeded permissible levels of pollution. The predominant source of air pollution in the borough is road traffic[xvii].

- Smoking – Approximately 6% of adults (18+) in Richmond smoked in 2018, significantly less than in London (13.9%) and England (14.4%)[xviii]. Prevalence of smoking in 15-year olds is 14.3%, more than twice the London average[xix].
- Just over a third of adults in the borough drink more than the recommended 14 units per week, which is the third highest proportion in London[xx]. 15-year olds in Richmond drink more regularly than in any other London Borough – 9% are regular drinkers[xxi]. More than 50% of over 16-year olds are overweight or obese[xxii]. 16.1% of children in Reception in the borough in the borough are overweight or obese and this percentage increases whilst children are at primary school, with the comparable Year 6 figure being 22.6% (2018/19)[xxiii]. Evidence suggests that obese children are more likely to be obese adults and are at an increased risk of developing further health difficulties. This is too high and a preventable public health issue.
- An estimated 22,000 people in the borough have a common mental health disorder (such as depression and anxiety)[xxiv].
- Younger adults can be more prone to risk taking behaviour, and over a fifth of 15 year olds in the borough have 3 or more risky behaviours, including smoking, drinking, cannabis, other drugs, poor diet and physical health, which is the third highest in London[xxv].

Richmond is a safe borough, where significant reductions in crime and anti-social behaviour have been achieved in recent years, but more still needs to be done to tackle crimes that impact vulnerable people, our communities and our neighbourhoods. We need to support the creation of inclusive neighbourhoods by embedding inclusive design.

What are we currently doing?

We work closely with Public Health colleagues. Planning policies seek to contribute towards encouraging healthy lifestyles in a number of ways, by influencing the pattern of land use through encouraging sustainable modes of transport, providing access to sports centres and recreation facilities, open spaces and places to play, to promote independent living, to provide access to healthy food and to consider the needs of all when designing new developments. Health Impact Assessments are required for proposals with 10 or more units.

Due to this and in line with Government advice, the policy approach for new fast food takeaways is considered to be an appropriate way of reducing the accessibility of potentially unhealthy food outlets to young people, as part of a wider strategy. Policy allows the Council to consider how to 'manage' proposals for new takeaways within 400 metres of schools.

We work collaboratively through the Community Safety Partnership (CSP). Planning policies seek design quality, through which measures to design out crime should be integral to development proposals to reduce opportunities for anti-social behaviour, criminal activities, and terrorism. Planning policies seek an inclusive development layout and public realm that considers the needs of all.

What do we have to find out?

We need to continue to work closely with our partners to ensure that we understand what the requirements are for health facilities in the borough, so that we can develop policies and allocate sites to meet this need. An update of the JSNA to analyse the health needs of the population is due in 2020. We need to use this updated information to understand the complex issues which affect our health some of which are environmental such as the quality of the air we breathe and access to open spaces and facilities for exercise, others are more personal choices, such as how much alcohol we drink and whether we smoke. We need to identify where the Local Plan can continue to make a contribution to promoting healthy lifestyles and choices and so help to reduce numbers of people with preventable diseases.

We need to ensure that promotion of health and wellbeing is a thread which runs through the Local Plan and is considered appropriately. The London Plan promotes a Healthy Streets Approach to put improving health and reducing health inequalities at the heart of public space, which links with active travel. In addition, we need to monitor our policy approach towards managing the number of new takeaways permitted within 400 metres of schools, as this is an area where planning can have a direct

influence. Further research will inform us whether we need to refine and/or strengthen the policy.

We need to work with the Community Safety Partnership and others to understand how our places can be made safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. We need to collaborate with local communities to understand how the factors that influence potential barriers to inclusion can be mitigated.

We need to engage with young people, including through the UK Youth Parliament via recently elected local representative, to ensure that we have understood young people's needs and make provision to meet them, to keep our children and young people healthy and safe.

What do we have to do?

We are considering the following policy directions:

- Set the priority to promote healthy and inclusive communities as a cross-cutting objective in the Plan, to address in land use policies and development proposals across the borough.
- Promote the Healthy Streets Approach to prioritise health in all planning decisions.
- Continue to protect land and buildings currently in use as a health facility.
- Working with our partners, allocate sites for health facilities where there is a proven need.
- Strengthening our existing policy on new takeaways located within a defined distance of

schools in specific areas.
- Continue to promote social interaction and promote public safety and take into account wider security and defence requirements.
- Promote the highest standards of accessible and inclusive design across all types of development and places, based on an inclusive neighbourhood approach.
- Develop effective place making strategies to ensure new developments result in the creation of new, or improvement of existing, quality public spaces that contribute to people's health, happiness and wellbeing.

What do you think?

- Do you agree with the proposed policy directions? If you disagree with any of the policy directions, please tell us more.
- Should it be easier to change use from other land uses to community uses?
- Should policy strongly resist more takeaways in areas in proximity to schools?
- Do you have any other suggestions on how planning can promote or contribute to creating places and an environment that is conducive to weight loss and active lifestyles?
- Are there other opportunities through planning to promote healthy lifestyles?
- How can we ensure convenient and welcoming development with no disabling barriers, providing independent access without additional undue effort, separation or special treatment?

Towards implementation, infrastructure, delivery and sites

More details to support implementation of the new Local Plan will be developed for the next stage in the preparation of the draft Plan. The Plan will identify key sites to assist with the delivery of the spatial strategy. An Infrastructure Delivery Statement will be produced by the Council to identify infrastructure needs and consider when and where it is needed, identify the partners we will work with, and how it may be funded.

Call for sites

The Council is required by Government guidance to issue a call for sites and broad locations for development as part of the preparation of the new Local Plan. This is to identify as many potential opportunities as possible, aimed at as wide an audience as possible so that those not normally involved in property development have the opportunity to contribute. There is a call for sites and broad locations alongside this consultation, so that we will have a better understanding, at this early stage in preparing the Plan, what land may become available during the Local Plan period and understanding of deliverability. Please note that the 'call for sites' exercise does not mean that the Council will have to allocate the suggested sites for development, but the Council will be able to assess from a potentially large number of sites their suitability, availability and deliverability.

You (individuals, landowners, developers, businesses, local groups) are invited to put forward sites for consideration. Information can be submitted (see details at start of this document on how to respond) to include details on:

- site location (if possible provide full address and a location plan);
- suggested potential type of development (e.g. economic development uses – retail, leisure, cultural, office, warehousing etc; residential – by different tenures, types and needs of different groups such as older people housing, private

rented housing and people wishing to build or commission their own homes);
- the scale of development;
- indication of when the site will be available for development; and
- constraints to development.

In addition, we would be interested to hear any general views about the market and how to maintain supply and delivery. Historically, there have been high implementation rates in the borough, as sites with permission are generally built out.

- We would like to know whether there are any barriers to delivery, such as infrastructure constraints?
- And if yes, do these affect any particular or common types of development, such as small sites?

Glossary

Affordable housing

Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. The NPPF sets out further the definition of affordable housing.

Brownfield land

(defined as Previously developed land): Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

London Plan

The London Plan is the spatial development strategy for the Greater London area and the Mayor of London is responsible for producing this planning strategy. The London Plan deals with matters of strategic importance to the area and forms part of the Development Plan for the borough. The plan was first published by the Greater London Authority in 2004 and was amended in 2008, 2011, 2013, 2015 and 2015-16. The preparation of a new London Plan commenced in 2017 and the final version is expected to be published in spring 2020.

National Planning Policy Framework (NPPF)

The NPPF, last updated in February 2019, sets out the Government's planning policies for England and how these are expected to be applied, alongside other national planning policies. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities. The Government also publishes Planning Practice Guidance (PPG) to support the framework.

Permitted Development Rights

Permitted Development Rights are a national grant of planning permission, which allow certain building works and changes of use to be carried out without having to make a planning application. Permitted Development Rights are subject to conditions and limitations to control impact and to protect local amenity.

Place making

Place making is how we collectively shape our public realm to maximise its shared value. Place making involves the planning, design, management and maintenance of public spaces. More than just creating better urban design of public spaces, place making facilitates creative patterns of activities and connections (cultural, economic, social, ecological) that define a place and support its ongoing evolution.

Public Transport Accessibility Levels (PTAL)

A measure of the relative accessibility of a point to the public transport network, taking into account walk access time and service availability (the higher the PTAL score, the better the accessibility).

Public Realm

This is the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces.

Significance (Heritage)

The value of a heritage asset to this and future generations because of its heritage interest. That

interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

Social infrastructure

Covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.

Strategic Environmental Assessment (SEA)

Required by European and UK law, SEA is a way of systematically identifying and evaluating the impacts that a plan is likely to have on the environment. The aim is to provide information in the form of an Environmental Report that can be used to enable decision makers to take account of the environment and minimise the risk of the plan causing significant environmental damage. Government guidance advises that where a plan requires both strategic environmental assessment and sustainability appraisal, that the former process should be integrated into the latter one.

Sustainability Appraisal (SA)

The Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development. Sustainability Appraisal is a systematic appraisal process. The purpose of Sustainability Appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document from the outset of the preparation process. This will ensure that decisions are made that accord with sustainable development.

Tall Building

A building defined as 18 metres in height or higher (approximately six storeys or above).

Zero Carbon

The Mayor of London defines 'Zero carbon' homes as homes forming part of major development applications where the residential element of the application achieves at least a 35% reduction in regulated carbon dioxide emissions (beyond Part L Building Regulations 2013) on-site. The remaining regulated carbon dioxide emissions, to 100%, are to be off-set through a cash in lieu contribution to the Council's Carbon Offset Fund, which is ring fenced to secure delivery of carbon dioxide savings elsewhere in the borough.

Appendix 1 – Local Plan process and timescales

Evidence (ongoing)

Initial evidence gathering

· Formulate initial aims and objectives for Local Plan
· Begin evidence gathering process
· Identify relevant environmental, economic and social objectives to inform the Sustainability Appraisal

Direction of Travel consultation (Spring 2020)

Consultation on first draft plan (Spring 2021)

Initial consultation and continued work on evidence gathering

· Engage with local communities, businesses and other Interested parties in line with Regulation 18 of Local Plan Regulations 2012
· Take into account representations received from consultation Process in line with Regulation 18(3) of Local Plan Regulations 2012
· Engage with duty to cooperate partners
· Ensure compliance with local planning authority's Statement of Community Involvement · Continue evidence gathering
· Test emerging options through Sustainability Appraisal

Publication consultation (Spring 2022)

Submission (Winter 2022)

Publication and submission

· Draft plan published for representations for a minimum of 6 works in line with Regulations 17 and 19 of Local Plan Regulations 2012 (and Regulation 21 if application In London)
· Plan submitted for examination, along with Sustainability Appraisal, evidence base and a statement Of representations and main issues in line with Regulation 22 Of Local Plan Regulations 2012

Examination (Spring/Summer 2023)

Consultation on modifications (Summer 2023)

Inspector's Report (Autumn 2023)

Adoption (Spring 20240

Examination of submitted plan

· Independent Inspector assesses plan to determine whether It has been prepared in line with the duty to cooperate, Other legal requirements, and whether it is sound in line with section 20 of the Planning and Compulsory Purchase Act 2004 and Regulations 23 - 24 of the Local Plan Regulations 2012

· Local planning authority can ask Inspector to recommend main modifications to make plan sound or comply with other legal requirements · Inspector issues report at end of examination

· Exceptionally, the Inspector will recommend the draft plan IS withdrawn if it has not been prepared in accordance with the duty to cooperate or it is likely to be found unsound

Adoption

· Draft plan formally adopted by the local planning authority In line with section 23 the Planning and Compulsory Purchase Act 2004

· Monitoring of implementation of Local Plan policies required in line with Regulation 34 of the Local Plan Regulations 2012

Appendix 2 – Sustainability Appraisal and Local Plan stages[xxvi]

Sustainability appraisal process

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

1. Identify other relevant policies, plans and programmes, and sustainability objectives
2. Collect baseline information
3. Identify sustainability issues and problems
4. Develop the sustainability appraisal framework.
5. Consult the consultation bodies on the scope of the sustainability appraisal report

Stage B: Developing and refining alternatives and assessing effects

1. Test the Local Plan objectives against the sustainability appraisal framework 2. Develop the Local Plan options including reasonable alternatives
3. Evaluate the likely effects of the Local Plan and alternatives
4. Consider ways of mitigating adverse effects and maximising beneficial effects
5. Propose measures to monitor the significant effects of implementing the Local Plan

Stage C: Prepare the sustainability appraisal report

Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public

Stage E: Post adoption reporting and monitoring 1. Prepare and publish post-adoption statement 2. Monitor significant effects of implementing the Local Plan 3. Respond to adverse effects

Local Plan preparation

Evidence gathering and engagement

Consult on Local Plan in preparation (regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012). Consultation may be undertaken more than once if the Local Planning Authority considers necessary.

Stage C: Prepare the publication version of the Local Plan

Seek representations on the publication Local Plan (regulation 19) from consultation bodies and the public

Submit draft Local Plan and supporting documents for independent examination

Outcome of examination Consider implications for SA/SEA compliance

Local Plan Adopted

Monitoring: Monitor and report on the implementation of the local plan

Appendix 3 – References and sources of information

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i.   The new Local Plan is anticipated to be adopted in 2024, at which point it will supersede the existing Local Plan (2018) and the Twickenham Area Action Plan (2013). The West London Waste Plan (2015) and the Ham & Petersham Neighbourhood Plan (2019) will not be superseded by the new Local Plan.

ii.   Climate emergency declared in Richmond upon Thames, 11 July 209: www.richmond.gov.uk/climate-emergency-declared

iii. Climate change and air quality www.richmond.gov.uk/climate_change

iv.   www.richmond.gov.uk/our_climate_change_strategy_and_air_quality_action_plan

v.   Council's Corporate Plan 2018 – 2022: Standing up for Richmond Residents

vi.   https://www.richmond.gov.uk/libraries

vii. Thames Water, Shape your water future (April 2019) https://corporate.thameswater.co.uk/-/media/Site-Content/Your-water-future-2019/Overview--April-2019.pdf

viii. Median monthly rental prices for the private rental market in England, calculated using data from the Valuation Office Agency and Office for National Statistics https://www.ons.gov.uk/releases/privaterentalmarketsummarystatisticsoctober2018toseptember2019

ix.   Local Data Company, GB Retail and Leisure Market Analysis H1 2019 Update, Published September 2019.

x.   as defined in the Town and Country Planning (Use Classes) Order 1987

xi.   Understanding Businesses in the London Borough of Richmond (2018) https://www.richmond.gov.uk/services/business/local_information_for_businesses/business_surveys/business_survey_2018

xii. Richmond Local Plan Inspector's Report (26 April 2018): www.richmond.gov.uk/media/15774/lp_inspectors_report_and_main_modifications.pdf

xiii. Report of the Examination in Public of the London Plan (8 October 2019): www.london.gov.uk/sites/default/files/london_plan_report_2019_final.pdf

xiv. London Datastore: Access to Public Open space and nature by ward, published by GiGL.

xv.   Public Health Outcomes Framework 1.16, 2014/15.

xvi. Physical activity profiles, Excess weight (2013-15), Percentage of adults achieving less than 30 minutes of physical activity per week (2015)

xvii. London Borough of Richmond upon Thames website, Air pollution, www.richmond.gov.uk/air_pollution.

xviii. Public Health Outcome Framework Data Update, August 2019.

xix. What About YOUth? Survey 2014/15.

xx.   PHE Local Alcohol Profiles for England, 2011-14.

xxi. PHE Child Health Profiles, 2015/16.

xxii. PHE Physical activity profiles, Excess weight (2013-15), Percentage of adults achieving less than 30 minutes physical activity per week (2015)

xxiii. PHE Child Health Profiles 2019, Data source – National Child Measurement Programme 2018/19

xxiv. PHE Common Mental Health Disorders Profile - People estimated to have any common mental health disorder, 2014/15 CCG.

xxv. What About YOUth? Survey 2014/15.