



London Borough of Richmond upon Thames

Local Plan

Richmond upon Thames

Local Plan consultation

from 4 January – 1 February 2016

Consultation on the scope and rationale for review of planning policies (Core Strategy 2009 and Development Management Plan 2011), together with the emerging site allocations

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1 INTRODUCTION

1.1 The Borough's Local Plan

- 1.1.1 The existing [Local Plan](#)¹ for the London Borough of Richmond upon Thames sets out how and where development in the Borough will be delivered in the future and is currently made up of a series of documents, as shown in Table 1 below.

Plan	Function	Status
Core Strategy	Vision and strategic policies	Adopted in April 2009
Development Management Plan	Detailed policies for the management of development	Adopted in November 2011
Twickenham Area Action Plan	Policies and proposals for Twickenham	Adopted in July 2013
Joint West London Waste Plan	Planning for waste	Adopted in July 2015
Saved Unitary Development Plan	Saved site-specific proposals	Adopted in March 2005
Site Allocations Plan	Site-specific proposals	Draft (pre-publication consultations in 2013 and 2014)

Table 1: Existing adopted and draft Development Plan Documents (DPDs)

- 1.1.2 The [Core Strategy \(CS\)](#)² outlines the vision, spatial strategy and includes 20 core planning policies on topics such as climate change, housing, employment and retailing. It provides the framework for the development of other DPDs within the Local Plan to build upon.
- 1.1.3 The [Development Management Plan \(DMP\)](#)³ builds on the objectives and principles of the Core Strategy and includes more detailed policies for the management of development. The DMP was adopted in November 2011.
- 1.1.4 The Council adopted the [Area Action Plan for Twickenham Town Centre](#)⁴ in 2013, which sets out detailed policies and proposals for Twickenham town centre.
- 1.1.5 The six West London boroughs (Brent, Ealing, Harrow, Hounslow, Hillingdon and Richmond upon Thames) including the Old Oak Common and Park Royal Development Corporation, have prepared together the [West London Waste Plan](#)⁵. It sets out a strategy for the sustainable management of waste and also identifies and allocates sites for managing the area's waste over the period up to 2031.
- 1.1.6 The [saved Unitary Development Plan \(UDP\)](#)⁶ has largely been replaced by the Local Plan (i.e. the Core Strategy and Development Management Plan). The only parts of the UDP that remain saved and have not been superseded are the Proposal sites.

¹ www.richmond.gov.uk/local_plan

² www.richmond.gov.uk/core_strategy.htm

³ www.richmond.gov.ukdevelopment_management_plan.htm

⁴ www.richmond.gov.uk/twickenham_area_action_plan.htm

⁵ www.wlwp.net

⁶ www.richmond.gov.uk/unitary_development_plan.htm

- 1.1.7 The Council commenced work on the [Site Allocations Plan](#)⁷ in December 2012 with a ‘Call for Sites’ consultation. Subsequently, pre-publication consultations were undertaken in 2013 and 2014. Work undertaken to date includes the following:

What	When
Evidence gathering	From September 2012
“Call for sites”	December 2012 – January 2013
Pre-publication Consultation	October – November 2013
Pre-publication - consultation on additional sites	June – July 2014
Pre-publication - consultation on new educational sites	August – October 2014

Table 2: Work undertaken to date on the draft Site Allocations Plan (2012 – 2014)

- 1.1.8 The [Borough Community Infrastructure Levy \(CIL\)](#)⁸, although not a formal Development Plan Document, is of relevance to the Local Plan as it sets out the Council’s rates of CIL that apply to certain types of development in the borough.

1.2 Why are we undertaking a review of the existing policies

- 1.2.1 In line with national planning policies, the Local Plan should be kept up-to-date. The National Planning Policy Framework (NPPF) allows for Local Plans to be reviewed in whole or in part to respond flexibly to changing circumstances. Both the CS and DMP were prepared prior to the NPPF. In addition other Government changes to planning policies and regulations have occurred since their adoption in 2009 and 2011 respectively. Consequently, the [Council’s Cabinet](#)⁹, at its meeting on 2 July 2015, agreed that a review of the existing policies contained within the Core Strategy (CS) and Development Management Plan (DMP) should be undertaken.

- 1.2.2 The review of the policies contained within the CS and DMP is intended to:

- address local priorities, needs and opportunities; in particular to strengthen the economic focus and to support businesses;
- take account of the borough’s updated evidence base, for example in relation to employment land and existing office stock;
- ensure policies continue to be in accordance with national policies (i.e. NPPF) and in general conformity with regional planning policies (i.e. London Plan 2015);
- take account and address the implications of other Government changes such as new Permitted Development rights and changes to technical Housing Standards;
- take account of the Council’s approach towards village planning and associated Supplementary Planning Documents (SPDs), which focus on locally specific guidance on design and character;
- ensure matters and issues raised by the local community as part of the Council’s village planning process are considered;
- allocate specific sites for future development and to deliver the spatial strategy and needs of the borough;
- ensure development proposals are assessed against an up-to-date spatial strategy and policy framework, thereby strengthening local decision making;

⁷ www.richmond.gov.uk/site_allocations_plan.htm

⁸ www.richmond.gov.uk/borough_cil.htm

⁹ <http://cabnet.richmond.gov.uk/documents/s57296/Local%20Plan%20Programme.pdf>

- provide certainty for developers by clearly setting out the Council's expectations and requirements; and
- set out the strategic direction and policies for 15 years from the date of its adoption in 2018 (i.e. until 2033).

1.2.3 At this stage, it is anticipated that the strategic policies from the Core Strategy and the detailed policies from the Development Management Plan will be combined into a single Local Plan. This will provide the opportunity to streamline the suite of policies where there is potential duplication, making it easier for users of the document.

1.2.4 The Twickenham Area Action Plan (AAP) will remain as existing due to its relatively recent adoption and will not be reviewed as part of this process. It should be noted that the NPPF was fully taken into account during the development of the Twickenham Area Action Plan (AAP).

1.3 What is happening to the draft Site Allocations Plan

1.3.1 The Council commenced work on its Site Allocations Plan towards the end of 2012 (also see para 1.1.7 above). It is now proposed to take the site-specific allocations forward alongside the review of the existing policies (as agreed by Cabinet at its meeting on 2 July 2015). This will enable the Council to align the sites available with the needs of the borough as identified through the Local Plan Review.

1.3.2 It should be noted that the work undertaken to date to prepare the Site Allocations Plan has been used as a basis for considering allocations in the review of the Local Plan, whereby the main aims are to:

- allocate key sites for certain uses where development / regeneration proposals are anticipated to take place within the next 15 years;
- deliver the spatial policies and identified priorities by allocating sufficient land where possible to help addressing identified needs (e.g. for education uses);
- ensure the proposed development sites are 'available' and 'deliverable' by engaging with landowners (work has already progressed on some sites since they have been originally identified for allocation in 2012/13); and
- take account of updated research and recent trends, such as in relation to the loss of offices, which indicates that a more robust Local Plan response is required to support the borough's employment needs.

2 THIS CONSULTATION

2.1 Purpose of this consultation

- 2.1.1 This is a consultation on the rationale and scope for the review of the Core Strategy (CS) and Development Management Plan (DMP) policies and the proposed sites to be allocated for development.
- 2.1.2 This is an additional stage of consultation by the Council (not prescribed by the Local Planning Regulations) to provide the opportunity for early engagement with interested parties. This enables Duty to Cooperate bodies, key stakeholders, national and local organisations, developers and landowners as well as the local community to consider and respond at an early stage to the Council's approach to the review of the policies and sites.
- 2.1.3 Each existing planning policy of the CS and DMP has been assessed against relevant national and regional policies and guidance, together with local evidence and needs identified. This has been used to indicate whether there is a need to review each policy and what the scope of the review could be. We would like your comments on the proposed scope and rationale for the review.
- 2.1.4 The scope and rationale for the review of the policies was not only informed by an assessment against higher level policies and guidance, but also by:
- the information contained in the Council's Authority's Monitoring Report;
 - workshops with lead councillors;
 - workshops and meetings with planning officers (to gain feedback on the application of policies when making decisions on planning applications and when supporting appeals);
 - input from officers with expertise in areas such as transport, housing, pollution, biodiversity, design and conservation; and
 - planning policy issues that have emerged through consultations undertaken as part of the Council's Village Planning Programme.
- 2.1.5 The existing draft Site Allocations Plan has been used as a basis for the consultation document. All existing identified sites have been reviewed and considered in terms of their existing use and indications as to how they could assist in the delivery of the spatial strategy and strategic policies. We would like your comments on the development sites that are proposed to be included within the Local Plan.

2.2 What are we consulting on

- 2.2.1 The Council is now consulting on the following documents:
- **This document – Local Plan consultation:** This document provides essential background information to the proposed timetable and programme for the Borough's Local Plan review, including why and what we are consulting on and how to respond. Section 4 of this document provides a summary of the analysis undertaken on the scope and rationale for the review. For ease these have been grouped into policy areas, such as housing, employment, transport etc. but it is recognised that there are links between different groups of policies. Section 5 of this document sets out how the strategic policies and priorities could be delivered by allocating sites for certain uses. These uses have been taken from the draft Site Allocations Plan. However, at

this stage the Council would wish to maintain some flexibility and review the uses on some of the sites to be allocated until it is understood what the priorities and needs are for particular uses in different areas of the borough.

- **Appendix 1 – Detailed review of existing policies:** This appendix sets out the detailed analysis and assessment of the existing planning policies against national and regional guidance, local evidence and need, together with the rationale and scope for the review of the policies, including where there may be opportunities to consolidate some policies. The structure of the table in this appendix follows the order of the policies in the existing Core Strategy and Development Management Plan, where the current strategic policy is assessed first, followed by the relevant corresponding detailed policies from the Development Management Plan.
- **Appendix 2 – Proposed site allocations:** This appendix identifies the sites that are currently proposed for allocation. Each site is supported by a site map as well as a description of key features and appropriate land uses.
- **Appendix 3 – Proposed protection of important industrial estates and business parks:** This appendix sets out the details of the sites that have currently been identified as important industrial estates, business parks, creative industries and other key employment facilities that the Council would wish to protect.
- **Appendix 4 – Strategic Housing Market Assessment:** This appendix sets the context for the borough-wide Strategic Housing Market Assessment.

3 TIMETABLE FOR PREPARING THE LOCAL PLAN

3.1.1 The table below sets out the proposed indicative timetable for reviewing and preparing the London Borough of Richmond upon Thames Local Plan:

What	When
Consultation on scope of review of policies and draft site allocations – this consultation	Winter 2015/16
First consultation on the draft Local Plan (Pre-publication)	Late Spring / early Summer 2016
Second consultation on the draft Local Plan (Publication) that the Council intends to submit to Secretary of State	Late Autumn 2016
Submission of the draft Local Plan to the Secretary of State	Spring/Summer 2017
Independent Examination in Public	Autumn/Winter 2017/18
Adoption of the Local Plan	Spring 2018

Table 3: Timetable for preparing the Local Plan

4 SUMMARY OF REVIEW OF EXISTING POLICIES

4.1 Sustainable development, climate change, pollution and waste

- 4.1.1 The NPPF sets out the purpose of the planning system, which is to contribute to the achievement of sustainable development. All policies outlined in the NPPF, taken as a whole, constitute the Government's view of what sustainable development means in practice, whereby there are the following three dimensions: economic, social and environmental. The Council is therefore carrying out the review of the existing local policies within the context of this overarching approach to sustainable development.
- 4.1.2 There are existing local planning policies which refer to sustainable development. However, they are focussed on the environmental dimension rather than the social and economic aspects. There is a need to avoid confusion with the overarching definition of sustainable development as set out in the NPPF. Consequently it is proposed that the existing core policy on sustainable development be amended so that it focuses on sustainable construction. In addition, some policy updates are required such as in relation to the recent withdrawal of Code for Sustainable Homes and the Mayor of London's Energy Hierarchy. Specifically, whilst the Council and the Mayor of London have already been requiring 40% improvement of carbon dioxide emission reductions over and above those set out in the 2010 Building Regulations, the policies need to be updated to reflect the recalibrated target, which is now expressed in terms of Part L of the 2013 Buildings Regulations; i.e. 35% improvement on Building Regulations 2013. Policies will also need to be updated to clearly reflect the requirement for water efficiency targets, i.e. the optional higher standard. It will also need to be made clear when and for what type of developments the relevant targets apply.
- 4.1.3 With regard to climate change adaptation policies, such as flood risk and sustainable drainage, overall the policies are in line with national and regional guidance although some updates are required to reflect for example latest legislation, evidence base studies and other initiatives. This includes the Flood and Water Management Act, the Council's role as a Lead Local Flood Authority, the Environment Agency's River Thames Scheme and TE2100 strategies and Drain London. Recommendations from the emerging update to the Strategic Flood Risk Assessment (SFRA) (to be published early 2016) will also need to be incorporated into the policies.
- 4.1.4 There are opportunities to streamline policies, particularly in relation to sustainable construction as well as climate change adaptation, whereby strategic and detailed policies could be consolidated.
- 4.1.5 In relation to pollution, the evidence suggests that there is a need for a local policy and guidance that deals with protecting and enhancing the quality of the local environment. This includes air quality, environmental pollution, noise and light pollution and land contamination as well as promoting and supporting sustainable development. This could also cover some elements relating to managing impacts of construction. The evidence also suggests there is a need for additional guidance to be set out in a SPD that addresses local environmental impacts and pollution. Potential impacts from new residential development in town centres/shopping parades on existing businesses should also be considered to ensure their viability and operations are not restricted.
- 4.1.6 The West London Waste Plan was adopted in July 2015 and it provides an up-to-date policy framework for waste. The evidence suggests however that there remains a

need for a waste management policy that could cover specific requirements such as in relation to site waste management plans and the handling of construction, excavation and demolition waste. In addition, the policy should refer to the Refuse and Recycling Storage Requirements SPD (2015) to ensure that new developments, including changes of use, provide accessible, adequate and well-designed internal and external storage facilities for residual waste and recycling.

- 4.1.7 At this stage, it is not envisaged to carry out any further research or evidence gathering in relation to sustainable development, climate change mitigation and adaptation other than through the updating of the SFRA.

4.2 Historic environment

- 4.2.1 The strategic policy in relation to protecting and improving the local environment needs to be updated to reflect the Council's approach to village planning, including the Village Planning Guidance SPDs.

- 4.2.2 In light of the NPPF, which requires a positive strategy for the historic environment, some policy updates may also be required, and it could be emphasised that the historic environment can make a positive contribution to achieving good design.

- 4.2.3 There have been some changes in national guidance in terms of the terminology for protecting heritage assets as set out in the NPPF. Therefore, some amendments to the policies are required to ensure that the protection of the heritage asset is consistent with its significance whilst retaining the Council's current approach to protecting and where possible enhancing heritage assets.

- 4.2.4 Opportunities to consolidate policies relating to 'designated heritage assets' (i.e. World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Parks and Gardens and Conservation Areas) could be considered. However, given the borough's exceptional heritage, it may be appropriate to retain the approach of individual policies for individual heritage assets. In particular, due to the uniqueness of the Royal Botanic Gardens Kew World Heritage Site, a separate policy, which includes a map of the designated site including its buffer zone, may be justified.

- 4.2.5 Policies relating to non-designated heritage assets' (i.e. Buildings of Townscape Merit, Archaeological Sites and war memorials) could also be streamlined and consolidated. However, it may be preferred to retain separate policies, such as for archaeology. The policy on designated views and vistas may also benefit from some updates and clarifications.

- 4.2.6 At this stage it is not proposed to undertake any additional evidence base studies and research other than the detailed character and design studies carried out as part of the village planning process, including the potential for new or extended Conservation Areas or further Buildings of Townscape Merit.

4.3 Design and character

- 4.3.1 The strategic policy as well as some of the detailed policies in relation to protecting and improving the local environment and ensuring high quality design need to be updated to reflect the Council's approach to village planning, including the Village Planning Guidance (Supplementary Planning Documents). In addition, the Council's Uplift programme could also be reflected in the policies relating to the local environment.

- 4.3.2 It is considered that there is a need to strengthen the focus of the policies on high quality design, whereby the Village Plan and other SPDs (Design Quality, House Extensions and External Alterations, Small and Medium Housing Sites SPD, Front Garden SPDs) provide the necessary evidence base and detail to assess context, local character and design quality.
- 4.3.3 The policy relating to taller buildings is in need of updating to provide clarity to local communities, residents and developers in terms of the definitions for ‘tall’ and ‘taller’, and to clearly define what the ‘appropriate’, ‘sensitive’ and ‘inappropriate’ locations are for tall buildings in this borough (as required by the London Plan). The policy could also benefit from additional guidance on assessing potential applications for tall and taller buildings outside the areas that are identified as ‘appropriate’, and also for areas where there are already existing tall/taller buildings. It is not proposed to update the existing borough-wide Sustainable Urban Development Study (2008) and therefore the results and outcomes of the original study as well as consideration of relevant planning decisions/appeals are proposed to be used to update this policy.
- 4.3.4 The evidence, including feedback on the implementation of the policy, suggests that the policy on ‘neighbourliness’ should be updated and made clearer such as by adding definitions and clearly setting out on what grounds a proposal may be considered unacceptable. Some additional guidance and information in relation to the relevant BRE tests may also be useful to be added to the policy.
- 4.3.5 The Council is keen to explore opportunities to consolidate some policies, such as on balconies, shop fronts/signs etc. and where possible, rely on, and refer applicants to, detailed guidance within relevant SPDs.
- 4.3.6 Overall the policies are generally considered to be in line with national and regional guidance. The Council would wish to retain current approaches to achieving high quality design whilst ensuring design guidance is aligned and policies are consolidated where possible. The review of the policies also provides an opportunity to address overlaps of design policies with other design guidance contained within housing and transport policies.
- 4.3.7 The Council has recently undertaken steps to manage the impacts of basement developments. There is now a borough-specific Good Practice Guide and webpage specifically related to basement developments. Further guidance could be added within other policies, such as flood risk, design or within new policy guidance in relation to environmental impacts, pollution and construction management. At this point in time, there appears to be insufficient evidence and justification to develop a restrictive basement planning policy in the borough. However, it is the Council’s intention to set up a Scrutiny Panel to investigate basement developments in the borough, which may provide further evidence, justification and/or recommendations as to whether a specific basement policy could be developed.
- 4.3.8 Other than the existing and emerging Village Plan SPDs, it is not proposed to undertake any additional research or produce any additional SPDs (other than updates to existing ones where required). It should also be noted that the Council does not consider there to be a need to undertake a borough-wide character study as the Village Plan SPDs fulfil this role, and there will be borough-wide coverage by 2017.

4.4 Town centres

- 4.4.1 Overall the town centre and retail policies are considered to be in line with national and regional guidance. The evidence suggests there is a need to retain the current policy framework, and the approach will result in an appropriate balance of uses in town centres, provide for local shopping and along with site allocations will accommodate the forecast for modest growth in retail floorspace.
- 4.4.2 Some of the updates that the Council is considering include making reference to the NPPF sequential and impact tests as well as to the Council's Village Plan SPDs. In addition, the evidence suggests that a locally set threshold triggering the requirement for relevant impact assessments to be undertaken (e.g. 500 square metres for retail) should be considered. Updates could also include listing the parades that are important for the local area in the town centre hierarchy.
- 4.4.3 Whilst the policies on retail frontages are in line with national and regional guidance, there are no designated primary shopping areas. However, town centre boundaries, key and secondary frontages as well as areas of mixed use are designated on the Proposals Map. Local evidence, including issues raised during village planning consultations, suggest that there is a need to look at the over-concentration of some uses, such as takeaways, betting shops and estate agents. In addition, to provide certainty to developers and local communities, there is a need to clarify which uses are considered compatible with the retail function of a centre, to define the term 'active frontage' if it is to be taken forward, to clarify where or when residential development might be acceptable on the ground floor in town centres, clearly set out marketing requirements and outline the approach to be applied to existing non-retail uses in designated shopping frontages. The Council may also consider a partial review of key and secondary shopping frontage designations, particularly where this has been identified as part of the Village Plan SPDs process.
- 4.4.4 In response to local residents' concerns regarding the loss of pubs and isolated facilities/shops that provide local goods and services, there is a need to clarify marketing requirements to support change of use applications; other updates could also be considered including defining reasonable walking distance and a cross-reference to the loss of social infrastructure policy.
- 4.4.5 In relation to the policy on the evening economy, it is considered that this policy should incorporate a policy approach relating to frontages subject to specific restrictions and there should be sufficient emphasis given to the consideration of impacts on residential amenity.
- 4.4.6 Opportunities could be explored to streamline and consolidate the strategic policy with some of the more detailed policies currently in the Development Management Plan, such as the policy on larger centres with the policy on local and neighbourhood centres.
- 4.4.7 The Council considers its evidence base on retail needs is up-to-date, particularly as the Retail Study was published towards the end of 2014. In addition, the Council carries out an annual town centre land use survey, the results of which are generally published by the end of the year. Therefore, at this point in time no major evidence or research is proposed to be carried out / commissioned in relation to town centres and retail.

4.5 Natural environment, parks, open spaces, rivers and sport & recreation

- 4.5.1 The biodiversity policies and the policies relating to protecting designated open land, such as Metropolitan Open Land (MOL) and Other Open Land of Townscape Importance, together with the Green Belt, are considered to be in line with national and regional guidance. However, in addition it may be appropriate to create a new overarching policy on green infrastructure to provide a strategic framework for the borough.
- 4.5.2 The Council is keen to consider updating the policy relating to trees to ensure that the multiple benefits that trees provide are realised. This could include specific requirements for developments in areas currently deficient in trees, including the potential for using planning obligations.
- 4.5.3 Some policies could benefit from updating, such as clarifying the requirements for on-site public open space, requirements for development sites in areas designated as deficient in public open space, and specific references could be included to ensure that Green Belt policies set out in the NPPF also apply to MOL (which is given the same level of protection).
- 4.5.4 The evidence suggests that the policy relating to play space requirements should be updated to specifically refer to the Council's method of assessing child occupancy and calculating the amount of play space required as set out in the Planning Obligations SPD.
- 4.5.5 Whilst overall the approach to assessing proposals for floodlighting is recommended to be retained, it may be appropriate to add an additional criterion to enable consideration to be given as to whether a proposal for floodlighting would meet identified needs as set out within the updated evidence base, such as the Council's Playing Pitch Strategy.
- 4.5.6 In general, the policies relating to open space, sport and recreation should have better linkages and cross references to the need for tackling health issues. These include obesity, promoting physical activity, developing stronger links between health and sports development programmes, encouraging healthier lifestyles and habits and increasing levels of physical activity, including taking account of older people.
- 4.5.7 There is some scope for consolidating and streamlining the policies relating to the River Thames and River Crane whilst retaining existing policy approaches. In addition, the policies could seek to address the balance needed to consider the potentially conflicting aims of increasing/improving access whilst at the same time protecting and enhancing the rivers' biodiversity. It is also recommended to clearly set out the requirements for a public footpath alongside the River Thames and to manage expectations in terms of residential moorings. In relation to the River Crane, it is suggested that the 'River Crane Area of Opportunity' designation be reviewed together with the status and progress on the development sites to which this policy relates to.
- 4.5.8 The Council completed a borough-wide Open Space, Sport and Recreation Needs and Opportunities Assessment in 2015, which sets out the strategy for the borough's sport facilities, open spaces, recreational facilities, playing pitches, playing fields and play space up to 2025. The up-to-date evidence base now includes the following:
- Playing Pitch Strategy May 2015

- Playing Pitch Strategy Assessment Report May 2015
- LBRuT Indoor Sports Facility Needs Assessment May 2015
- LBRuT Open Space Assessment Report April 2015

4.5.9 At this point in time, no further research or evidence requirements have been identified, but policies will need to be updated to take account of new assessment reports and strategies, including the updated Thames Landscape Strategy.

4.5.10 It is not proposed to review MOL and OOLTI boundaries as part of the Local Plan, with the exception of the Harrodian School in Barnes, where the Council has already publicly consulted on the removal of the MOL designation from the south-western corner of the existing site. This takes account of the cluster of buildings in the south-western corner, which can be distinguished from the predominately open character of the remainder of the site.

4.6 Transport

4.6.1 The transport policies are considered to be in line with the NPPF and London Plan. In particular the overarching strategy requires higher trip generating developments to be located within town centres and in areas well served by public transport. Some of the policies could, however, benefit from clarification, such as making it clearer what is meant by 'higher trip generating' and which Public Transport Accessibility Levels (PTALs) are considered to be 'easily accessible' by public transport.

4.6.2 There may be a need to update some policies including in relation to the London Plan requirement for electric vehicle charging points, managing freight and servicing and supporting alternatively fuelled vehicles. The Council may also wish to consider reviewing its current approach to car free housing development, including consideration of local impacts, in Richmond and Twickenham town centres.

4.6.3 The policies could also be updated to specifically encourage river transport in line with the London Plan's Blue Ribbon Network policies for passengers, tourism and freight transport. In addition the need to protect wharves and safeguard them for the shipment of freight, including waste and aggregates, could be incorporated.

4.6.4 The Council is keen to reinforce the existing requirements for maximum parking standards, car share facilities and car clubs, including the use of ultra-low emission vehicles. Evidence and justification for the continuation of the Borough's adopted parking standards will be provided to demonstrate general conformity with the London Plan.

4.6.5 It is considered that the adopted cycling standards could be updated to bring together the highest cycle parking standards from the existing policy and those from the London Plan to ensure general conformity.

4.6.6 Development at Heathrow is considered to be a matter for the Council as a whole through its corporate policies. Any Council response to consultations on development proposals would be informed by the Council's planning policies relating to matters such as air quality and noise.

4.6.7 It is recommended to signpost and/or include strategic projects such as strategic rail improvements as well as opportunities for foot/-cycle bridges across the River Thames and other initiatives such as minimising downtime at level crossings and managing impacts, within the implementation and delivery section of the transport

policy / Local Plan. In addition some of the detailed guidance, such as in relation to Travel Plans, Transport Assessments, Transport Statements, Construction Logistics Plans and Servicing and Delivery Plans could be included in a forthcoming Transport Standards SPD.

- 4.6.8 There are opportunities to consolidate some of the detailed transport policies with the strategic policy to streamline policies and remove duplication, such as in relation to the support for walking and cycling, enhancing transport links and improving interchange facilities.
- 4.6.9 With the exception of local evidence and justification in relation to car parking standards and the Transport SPD, at this point in time, no further research or evidence requirements have been identified.

4.7 Housing and affordable housing

- 4.7.1 The overall approach to housing delivery and the spatial strategy are in line with national and regional policy and guidance. However, updates are likely to be needed in order to reflect the new London Plan housing target for the Borough, which was adopted by the Mayor of London as part of the London Plan in 2015. In addition there is a need to consider developing the approach to size, type, tenure and specific needs including for the Private Rented Sector, Gypsies and Travellers, families and older people to accord with the NPPF and the recommendations of the Independent Inspector who considered the Further Amendments to the London Plan.
- 4.7.2 To this end the Council is in the process of undertaking a borough-wide Strategic Housing Market Assessment (SHMA) to build on the London-wide SHMA to support this consideration. A separate paper setting the context for the borough SHMA is published as Appendix 4.
- 4.7.3 The Council is also conscious that further areas may need to be considered. This includes the provision of Starter Homes and Custom and self-Build housing opportunities to take account of emerging changes in planning legislation (through the Housing and Planning Bill, which is currently progressing through the parliamentary stages) and associated policy changes.
- 4.7.4 The SHMA work will provide the opportunity to develop an up-to-date approach to housing considerations including the quantum, tenure, size and affordability of housing needed to deliver a policy compliant residential scheme, taking account of matters such as design and funding. The current affordable housing policy will also need to be updated to reflect small site contributions including in relation to conversions and former employment sites as set out in the Affordable Housing SPD.
- 4.7.5 There are also other housing policy areas that are in need of updating, in order to reflect the national approach to technical Housing Standards on inclusive access and internal space standards (for all tenures). In addition there are opportunities to address any potential overlaps between housing and other design policies, and ensure there is clarity in the type of development the policies apply to.
- 4.7.6 The Council is also considering a separate policy in relation to viability including provision for re-appraising the viability of schemes where appropriate and the need for viability information to be publicly available.
- 4.7.7 At this point in time, with the exception of the SHMA as identified above, no further research or evidence requirements have been identified. However, the emerging

requirements of the Housing and Planning Bill will need to be taken into account, particularly on brownfield land, Starter Homes and Custom and self-Build, and the implications on the affordable housing sector in light of changes to funding and welfare reform. This may result in the need for further research/evidence.

4.8 Social infrastructure, education, health and wellbeing

- 4.8.1 The policies relating to social infrastructure are considered to be in line with national and regional policies. Good quality social infrastructure and community facilities are essential to people's wellbeing and to successful communities.
- 4.8.2 Evidence and research on local needs for social infrastructure uses (as published by the relevant service providers, such as Achieving for Children, the Richmond Clinical Commissioning Group and NHS England) will need to be considered. In particular, account will be taken of the great need for schools and nurseries across the borough and pressure on health facilities. This could also include referring to mapped evidence and needs. The requirement for considering alternative social infrastructure uses on existing / vacated social infrastructure sites could also be clarified. Some minor updates may also be required such as in relation to Section 106, CIL and the Regulation 123 List
- 4.8.3 In relation to health and wellbeing, the current policy should be updated to reflect the joint working approach between Planning and health bodies/organisations. The policy could also reflect priorities such as tackling health inequalities, improving social cohesion and reducing social exclusion, as well as local priorities as set out in the borough Joint Strategic Needs Assessment (including in relation to the ageing population and obesity). The requirement for Health Impact Assessments for major developments should also be incorporated into the policy as this is already a requirement in the Council's adopted Local Validation Checklist.
- 4.8.4 A new policy approach that the Council is exploring is in relation to takeaways and tackling obesity. The evidence suggests there is an emerging obesity issue in the Borough. The introduction of a restriction on the development of further fast food takeaways in close proximity to schools where a concentration of such uses already exists could be considered to limit access to unhealthy foods is supported by this evidence.

4.9 Employment, businesses and tourism

- 4.9.1 The policies focusing on the protection of employment land are considered to be in general conformity with the NPPF and London Plan. However, evidence suggests that there is a clear need to strengthen the overall strategy and approach to protecting and encouraging land for employment use, particularly for small / medium spaces, start-up units as well as flexible employment space in order to support the Borough's economic/employment needs.
- 4.9.2 The Council is considering the introduction of a new policy and site specific designations to protect important key office areas. These are likely to cover:
- (a) the areas where an Article 4 Direction relating to office to residential conversions has applied since 30 November 2014;
 - (b) areas to which an Article 4 Direction will apply from 1 October 2016 and any significant office development built subsequently; and
 - (c) any significant office development built subsequently.

Policies may also be updated to support an increase in office floorspace in redevelopment schemes (this could be area specific).

- 4.9.3 The Council is also exploring the introduction of policy requirements for affordable office space and planning contributions for the provision of affordable office space where appropriate.
- 4.9.4 In relation to the Borough's business parks, industrial estates and creative industries, the Council could identify and list the relevant sites/areas to be protected within the employment policy.
- 4.9.5 Current policies include a sequential approach whereby the loss of employment floorspace is only allowed in very exceptional circumstances. A hierarchy of other employment uses that would be considered as exceptions could also be included. The current policies may also need updating to clarify definitions such as 'employment use' and ensure that the policy focuses on floorspace and types of employment use rather than number of employees. In addition, the Council requirements for the marketing of sites where a change of use is being promoted should be clarified and strengthened by setting out appropriate specific criteria. Where an industrial use may be considered detrimental to neighbours' living conditions, there may be some justification to include a requirement that mitigation measures are fully explored before considering other uses.
- 4.9.6 In relation to tourism, the evidence suggests that this policy could be updated to include specific reference to the prevention of loss of bed spaces as well as encouraging appropriate provision in line with London Plan targets.

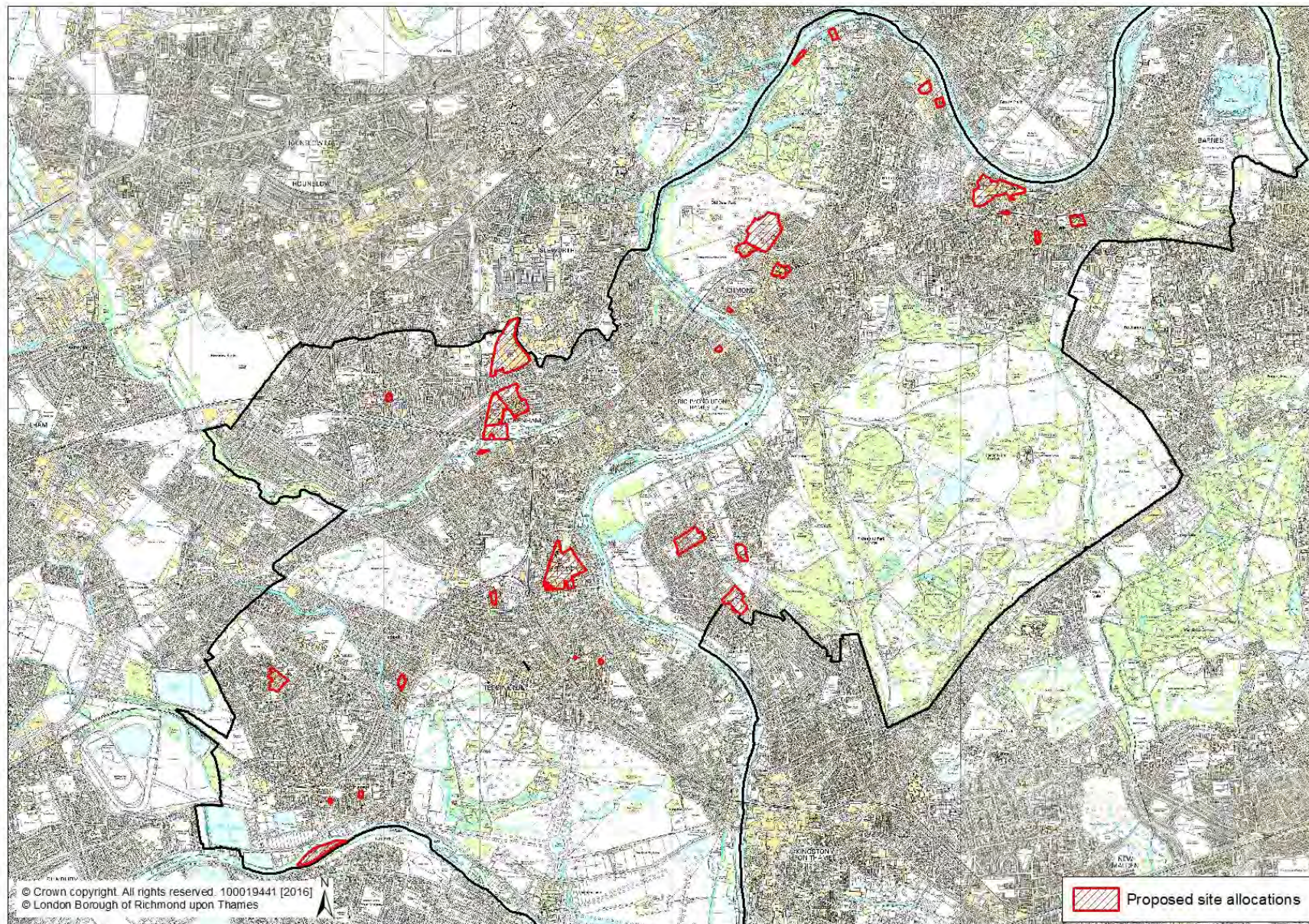
5 SITES TO BE ALLOCATED FOR DEVELOPMENT

- 5.1.1 The Council has identified key sites that are considered necessary to deliver the Council's spatial strategy (particularly in relation to land for employment, retail, housing and social infrastructure). The proposed land uses have already been previously explored through consultation on the draft Site Allocations Plan. The Council now considers that it would be appropriate for these sites to be allocated in this Local Plan. However, in some instances, site-specific circumstances may have changed such that the Council may no longer propose an allocation. In some cases, the needs previously identified or updated needs to be identified as part of the review of the policies, may also lead to changes in the land uses that have previously been proposed on specific sites.
- 5.1.2 This consultation is particularly seeking your views on whether the indicated uses that were identified through the emerging Site Allocations Plan are still appropriate, taking into account the needs and priorities that are emerging from the strategic policies.
- 5.1.3 In addition, sections 6 and 7 of this document set out the identified key sites where existing uses are proposed to be protected in order to deliver the Council's strategy and strategic policies (particularly in relation to offices, industrial estates, business parks, warehouses, creative industries and other key employment facilities).
- 5.1.4 A number of railway stations and other high street / highway / streetscene improvements were previously identified in the emerging Site Allocations Plan. The Council considers that it would be more appropriate to include such infrastructure improvement proposals as part of the Council's [Infrastructure Delivery Plan and Infrastructure Delivery Schedule](#)¹⁰, which will be updated during the preparation of the Local Plan, and/or as part of the strategic transport policy.
- 5.1.5 In addition, as part of the Local Plan review process and the allocation of sites, where appropriate the Council will also seek to identify on-site requirements developers will be expected to provide, such as in relation to social infrastructure. In this context, the Council may also review its current Regulation 123 List; for further information on the Regulation 123 List, please refer to the [Council's website](#)¹¹.
- 5.1.6 The map on the following page provides a borough-wide overview of the sites that are proposed to be allocated for development as part of the Local Plan. See Appendix 2 for details of these sites, including a site map showing the boundary as well as a description of key features and the proposed appropriate land uses.

¹⁰ www.richmond.gov.uk/infrastructure_delivery_plan.htm

¹¹ www.richmond.gov.uk/borough_cil_and_planning_obligations

5.1.7 Overview map of sites to be allocated for development:



6 PROPOSED PROTECTION OF KEY OFFICE AREAS

- 6.1.1 Evidence gathered with respect to the loss of offices in the borough suggests that there is justification to designate and protect sites as “Key office area” in order to secure the long-term future of important employment sites.
- 6.1.2 The Council has carried out significant research to support the making of two Article 4 Directions to remove the permitted development rights for change of use from office to residential. The first Direction came into effect on 30 November 2014, and the second Direction was made on 4 September 2015, which will come into effect on 1 October 2016. For further information, please see the [Council's website](#)¹², where you can also find detailed maps of the areas to which the Article 4 Directions apply.
- 6.1.3 As part of the Local Plan Review, it is proposed to designate the areas to which the Article 4 Directions apply as “key office area”, which would be supported by a specific new office policy (see section 4.9 above). In some instances, the boundaries of the areas to which the Article 4 Directions apply may be amended to take account of decisions on planning applications and/or prior approval notifications, and where appropriate, additional sites may be added where they meet the criteria for designation. During this consultation, we are particularly seeking your views as to whether you think these are the right areas to be protected as “key office area”.
- 6.1.4 The proposed areas to be designated as “key office area” are as follows (and are shown on the map under 6.1.5 below; page 22):

Hampton:

- Thames Street, Hampton
- Kingsway Business Park, Hampton
- Castle Business Village, Station Road and Mount Mews, High Street, Hampton

Hampton Wick:

- High Street & Lower Teddington Road, Hampton Wick

Hampton Hill:

- Hampton Hill Business Park, Hampton Hill
- Northern part of High Street, Hampton Hill

Teddington:

- Teddington town centre and Waldegrave Road
- National Physical Laboratory, Teddington

- 127-133 High Street, and 1 & 2A Cambridge Road, Teddington
- 180 High Street, Teddington
- 43-67 Broad Street, Teddington
- 90-120 Church Road, Teddington
- 38-42 Hampton Road, Teddington

¹² http://www.richmond.gov.uk/article_4_directions_offices_to_residential

Twickenham:

- Parts of Twickenham town centre
- Bridge House, Twickenham
- Hampton Road, Twickenham
- Briar House, 5-11 Briar Road, Twickenham
- West Twickenham, south of River Crane
- St George's Industrial Estate, Twickenham

East Twickenham and St Margarets:

- 417-435 Richmond Road, East Twickenham
- St George's House, 76 Crown Road, East Twickenham
- Old Lodge Place, St Margarets

Richmond:

- Richmond town centre
- Petersham Road, Richmond
- Brook House & Sandal House, Richmond
- Sheen Road, Richmond
- 72-84 Lower Mortlake Road, Richmond
- Falstaff House & St George's House, Bardolph Road, Richmond

Kew:

- The National Archives, Ruskin Avenue, Kew
- Blake Mews Station Avenue, Kew

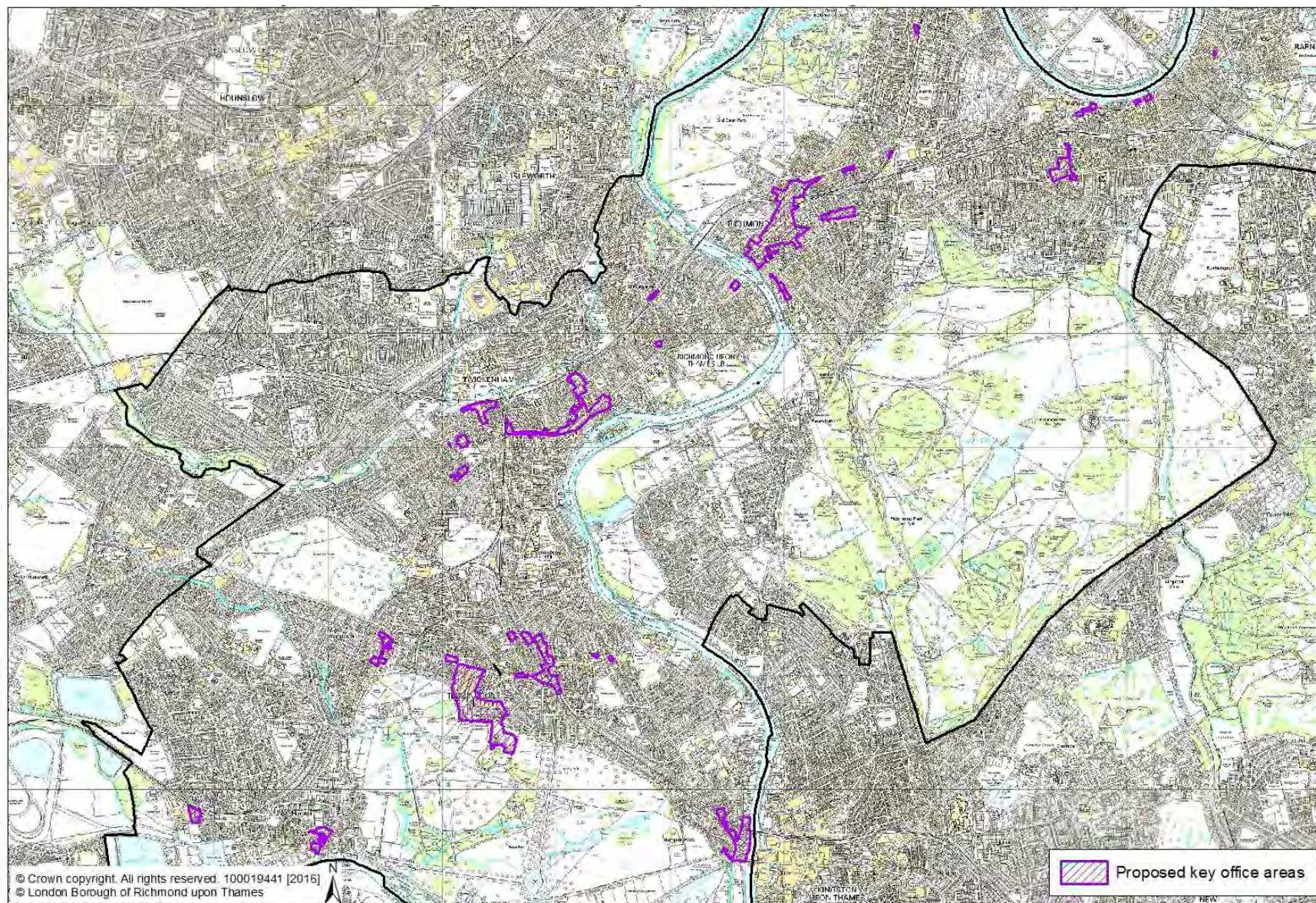
East Sheen and Mortlake:

- Part Sheen Lane, part Upper Richmond Road West, East Sheen
- Mortlake High Street, Mortlake
- Tideway Yard and The Old Power Station, Mortlake

Barnes:

- Prospect Studios, Barnes High Street, Barnes
- 42-46 Glenthams Road, Barnes

6.1.5 Overview map of the proposed designation of “key office areas” (detailed maps are available on the [Council’s website](#)¹³).



¹³ http://www.richmond.gov.uk/article_4_directions_offices_to_residential

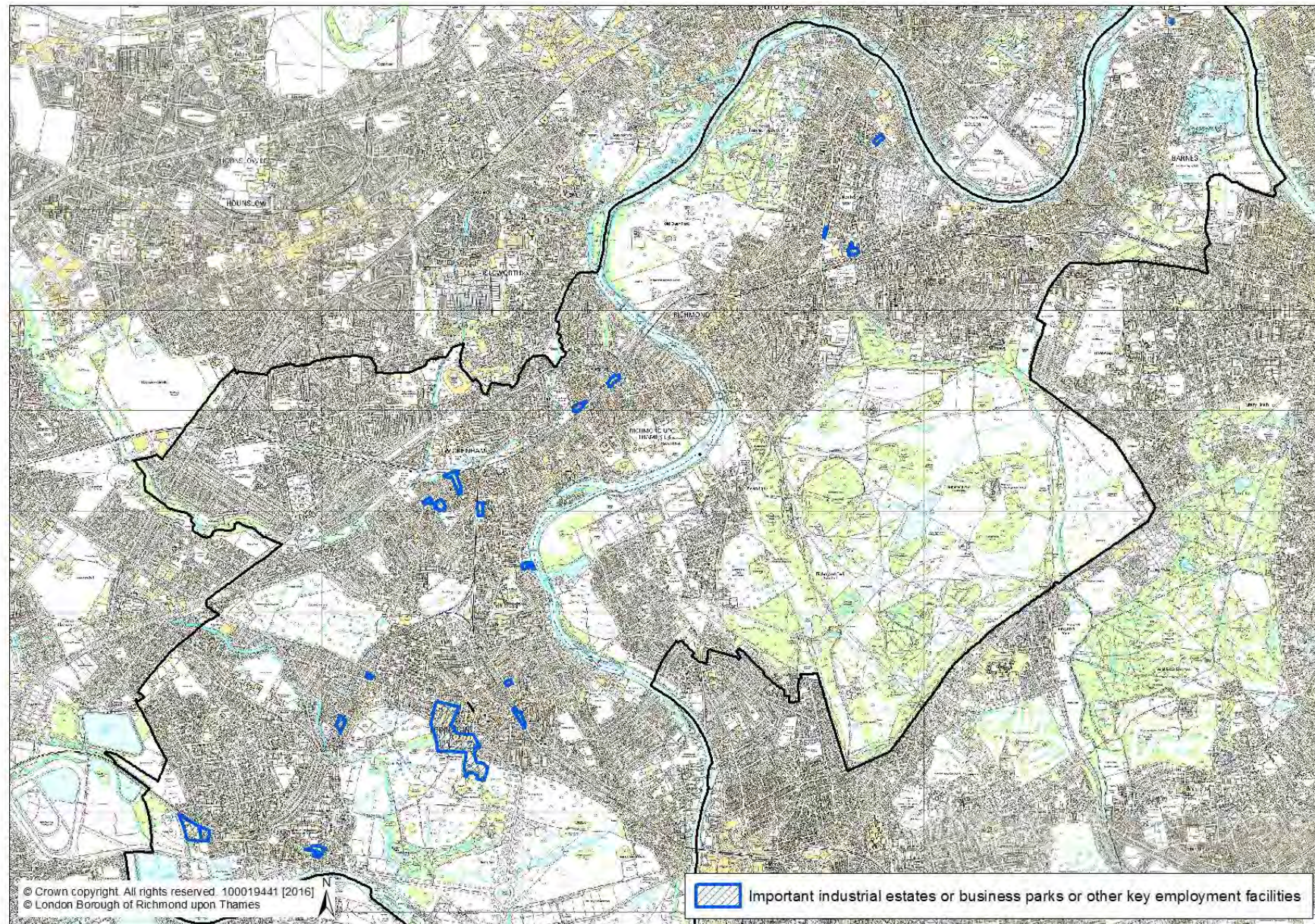
7 PROPOSED PROTECTION OF KEY EMPLOYMENT LAND

7.1.1 The pressure of demand for industrial/warehousing land is particularly high in the Borough. In order to support the borough's economic/employment needs consideration should be given to protecting key land and premises in industrial use, especially those falling within B2 and B8 land uses. This approach is supported by local evidence, which suggests that locally important sites should be either designated or specifically listed in a new / revised employment policy as important industrial estate and business parks. It should be noted that some of these sites also provide for locally important creative industries and other key employment facilities.

7.1.2 The following 19 sites have been identified for protection; please refer to Appendix 3 for a detailed map showing their boundaries:

- Kempton Gate Business Park, Oldfield Road, Hampton
- Kingsway Business Park, Oldfield Road, Hampton
- Castle Business Village, Castle Mews, Station Road, Hampton
- Hampton Hill Business Park, High Street, Hampton Hill
- St Clare Business Park, Holly Road, Hampton
- 50-56 Waldegrave Road, Teddington
- National Physical Laboratory, Hampton Road, Teddington
- Teddington Business Park, Station Road, Teddington
- West Twickenham cluster (including Gregg's Bakery and surroundings), Twickenham
- Heathland Industrial Estate, Twickenham
- St George's Industrial Estate, The Green, Twickenham
- Mereway Road Industrial Estate, Twickenham
- Swan Island Industrial Estate, Strawberry Vale, Twickenham
- St Margarets Business Centre, Winchester Road, St Margarets
- Twickenham Film Studios, St Margarets
- Market Road, Richmond
- Sandycombe Centre, Sandycombe Road, Kew
- Marlborough Trading Estate, Mortlake Road, Kew
- Glenthams Road, Barnes

7.1.3 Overview map of the important industrial estates, business parks, creative industries and other key employment facilities:



8 HOW TO RESPOND

8.1 Availability of documents

8.1.1 The consultation documents can be viewed as follows:

- online on the Council's [Local Plan Review](http://www.richmond.gov.uk/local_plan_review) website at **www.richmond.gov.uk/local_plan_review**;
- at all [Borough's main libraries](http://www.richmond.gov.uk/libraries)¹⁴; and
- at the Civic Centre in Twickenham.

8.1.2 Any comments should be received by the Council **no later than 1 February 2016**. You can respond in the following ways:

- Email to Ldfconsultation@richmond.gov.uk
- Post to:
Planning Policy
London Borough of Richmond upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

8.1.3 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 the pre-publication Local Plan later in 2016.

8.2 Key questions to consider when responding

8.2.1 The Council's consultation on the scope and rationale for the review of the planning policies together with the draft site allocations is being published for a four-week period. During this time, we are inviting comments on the Council's analysis of the existing policies against national and regional policies, our existing evidence base and the rationale for the review. In addition, we are inviting comments on the proposed sites to be allocated for certain uses. In particular, we would like you to consider the following questions when responding to this consultation:

- Do you agree with the Council's assessment of the existing policies against national policies, in particular the National Planning Policy Framework (NPPF)?
- Do you agree with the Council's assessment of the existing policies against regional policies, in particular the London Plan?
- Are you aware of any other pieces of research or evidence that the Council should be using when considering the local needs as well as the rationale and scope for the review of the policies?
- Do you agree with the Council's rationale for the review of existing policies and do you have any specific comments in relation to the proposed scope of the review?

¹⁴ www.richmond.gov.uk/libraries

- Do you agree with the Council's indicative identification of sites, including the proposed land uses, to be considered for allocation in the Local Plan?
- Are you aware of any other key sites within the borough that should be considered for allocation because they are either:
 - more than 0.25 hectares in size;
 - would provide ten or more homes; or
 - would meet a development need identified in the Council's Local Plan and strategic policies?
- Do you agree with the Council's approach to a borough-wide Strategic Housing Market Assessment?

8.3 What happens next

- 8.3.1 The Council will analyse and take account of all consultation responses received when drafting revised policy wording and when considering the specific site allocations.
- 8.3.2 There will be a formal consultation on the first draft Local Plan in the late spring / early summer 2016, where you will have a further opportunity to comment. Please also refer to the timetable set out in section 3 of this document.

APPENDIX 1 – DETAILED REVIEW OF EXISTING POLICIES

Published separately.

APPENDIX 2 – SITES TO BE ALLOCATED FOR DEVELOPMENT

This appendix sets out the sites that are proposed for allocation. Each proposal site is supported by a site map as well as a description of key features and proposed land uses.

- **Hampton Square, Hampton**



- The Council has already rejuvenated Hampton Square through an £800,000 investment project. The Square now provides a modern and welcoming focal point for Hampton North, including an impressive illuminated water feature, seating, landscaping and space for a whole range of community activities
- There is still a need for partial redevelopment and improvement of the related buildings to provide for community, retail, service, local business uses and residential uses, including affordable housing

- **Hampton Traffic Unit, 60-68, Station Road, Hampton**



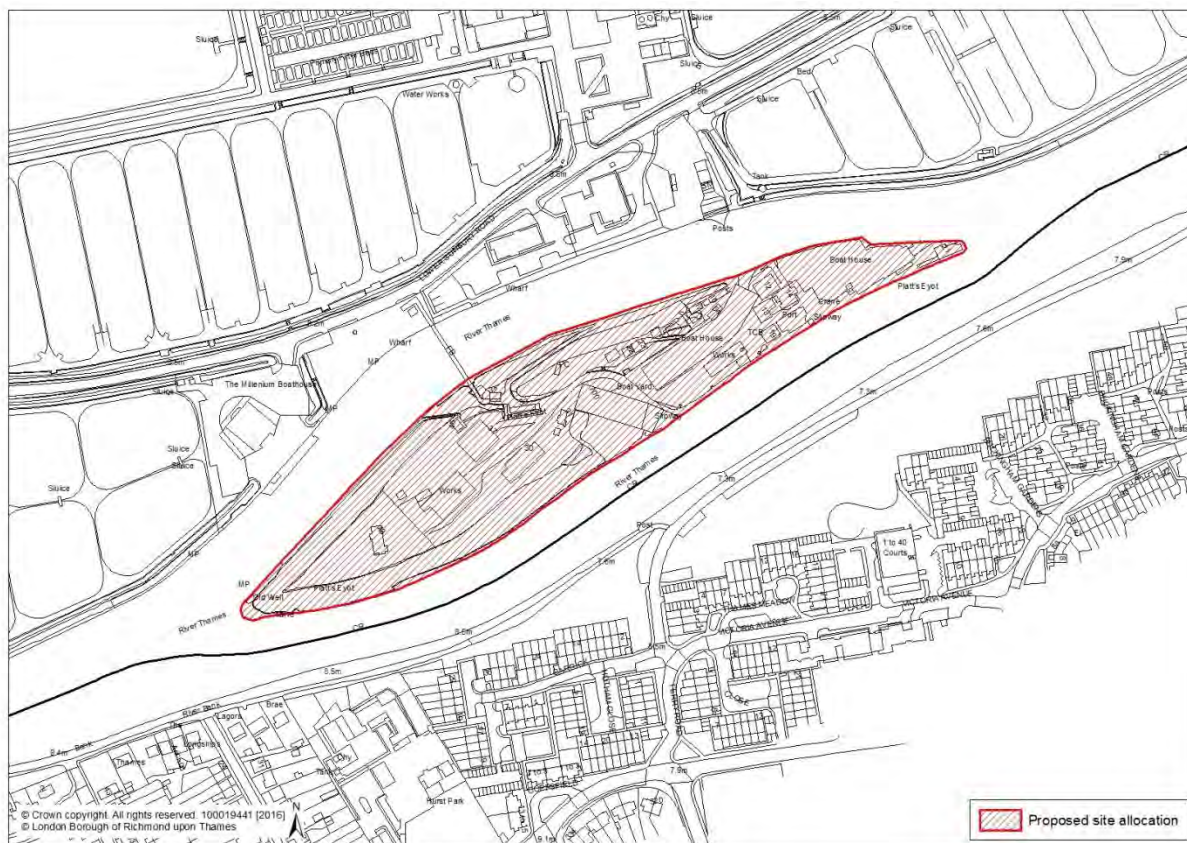
- Within a designated Area of Mixed Use
- Building of Townscape Merit
- Is subject to being declared surplus to requirements by the Metropolitan Police
- The evidence suggests there is a need for employment generating and other commercial or social infrastructure uses in this area
- Residential uses may be appropriate as part of a mixed use scheme

- **Hampton Delivery Office, Rosehill, Hampton**



- Is subject to being declared surplus to requirement by the Royal Mail
- The evidence suggests there is a need for employment generating and social infrastructure uses in this area. Residential uses may also be appropriate as part of a mixed use scheme.
- If employment generating and social infrastructure uses have been explored and options discounted, then a residential only scheme with affordable housing and on-site car parking would help to meet local housing needs.

- **Platts Eyot, Lower Sunbury Road, Hampton**



- A number of listed boathouses are on the Heritage at Risk Register
- Need to retain employment, protect businesses, particularly river-related uses
- Need to ensure that properties on the Heritage at Risk register together with the wider character of the area are improved and enhanced
- It is acknowledged that some enabling residential development may be needed to support the restoration of the listed buildings, but residential uses should be in the form of live-work units and complement the existing character rather than providing for commuters
- The Council will work closely with the Environment Agency to understand the issues relating to the provision of safe access / egress to and from the island

- **Teddington Delivery Office, 19 High Street, Teddington**



- Located within Teddington's town centre boundary
- Partly designated as key shopping frontage
- Partly designated Building of Townscape Merit
- Is subject to being declared surplus to requirement by the Royal Mail
- The Council's Retail Study (November 2014) forecasts a requirement for ca. 2000m² (gross) of A1 to A5 uses for Teddington (over and above commitments); approximately half of this requirement is for comparison retail
- The site could accommodate around 400m² of retail at ground floor
- The evidence suggests there is a need for commercial / retail on the ground floor, particularly facing the High Street (taking account of BTM designation and subject to feasibility and viability of altering the elevations). There is potential for providing space for offices and housing, including affordable housing, above and to the rear of the site.

- **Telephone Exchange, High Street, Teddington**



- Located within Teddington's town centre boundary
- Partly designated as key shopping frontage
- The Retail Study (November 2014) forecasts a requirement for ca. 2000m² (gross) of A1 to A5 uses for Teddington (over and above commitments); approximately half of this requirement is for comparison retail
- Site could accommodate up to two thirds of Teddington's retail need
- Is subject to being declared surplus to requirements by British Telecom
- The evidence suggests that appropriate land uses could include retail, employment generating uses such as offices and/or other town centre uses on ground floor; there could also be a mixture of offices and residential uses on upper floors

- **Strathmore Centre, Strathmore Road, Teddington**



- Poor access provision and low public transport accessibility level (PTAL)
- Any redevelopment proposal will be subject to the re-provision of the existing social infrastructure use (i.e. Scamps nursery)
- The evidence suggests there is a need for social infrastructure facilities, which would have to be fully explored
- It is acknowledged that there may be capacity/opportunity for a mix of uses to be provided, including residential, maximising affordable housing.

- **Richmond upon Thames College, Egerton Road, Twickenham**



- There is a clear identified need for a new campus for education and enterprise, including replacement college, a science / technology / engineering / maths centre, new special education needs school, technical hub (B1) for Haymarket Media, new sports centre and upgrading of playing fields
- Consider whether allocation should include playing fields and area adjacent to the River Crane in the south

- **Mereway Day Centre, Mereway Road, Twickenham**



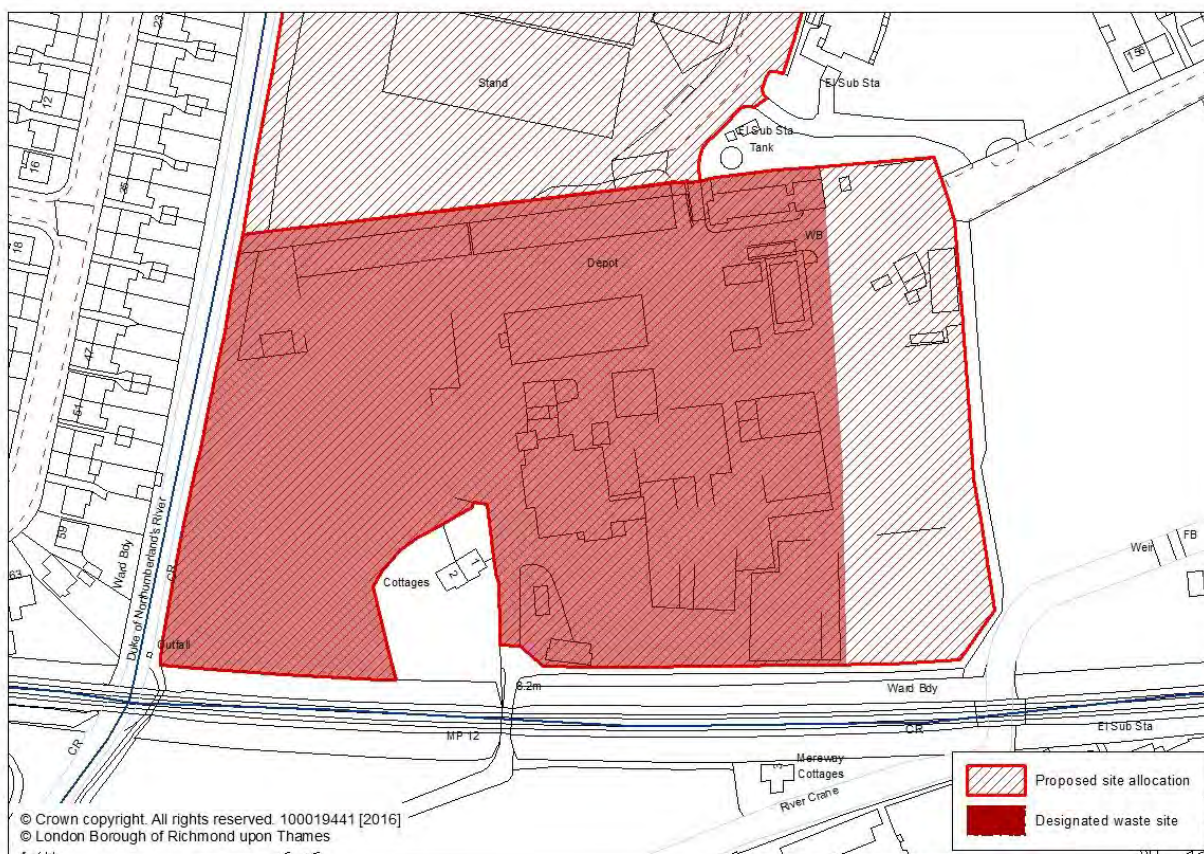
- Disused day centre
- Poor access provision and low public transport accessibility level (PTAL)
- Social infrastructure uses and needs should be fully explored before considering other uses
- It is acknowledged that due to poor access and low PTAL a residential scheme, with priority for affordable housing, may also be appropriate

- **St Mary's University College, Waldegrave Road, Twickenham, TW1 4SX**



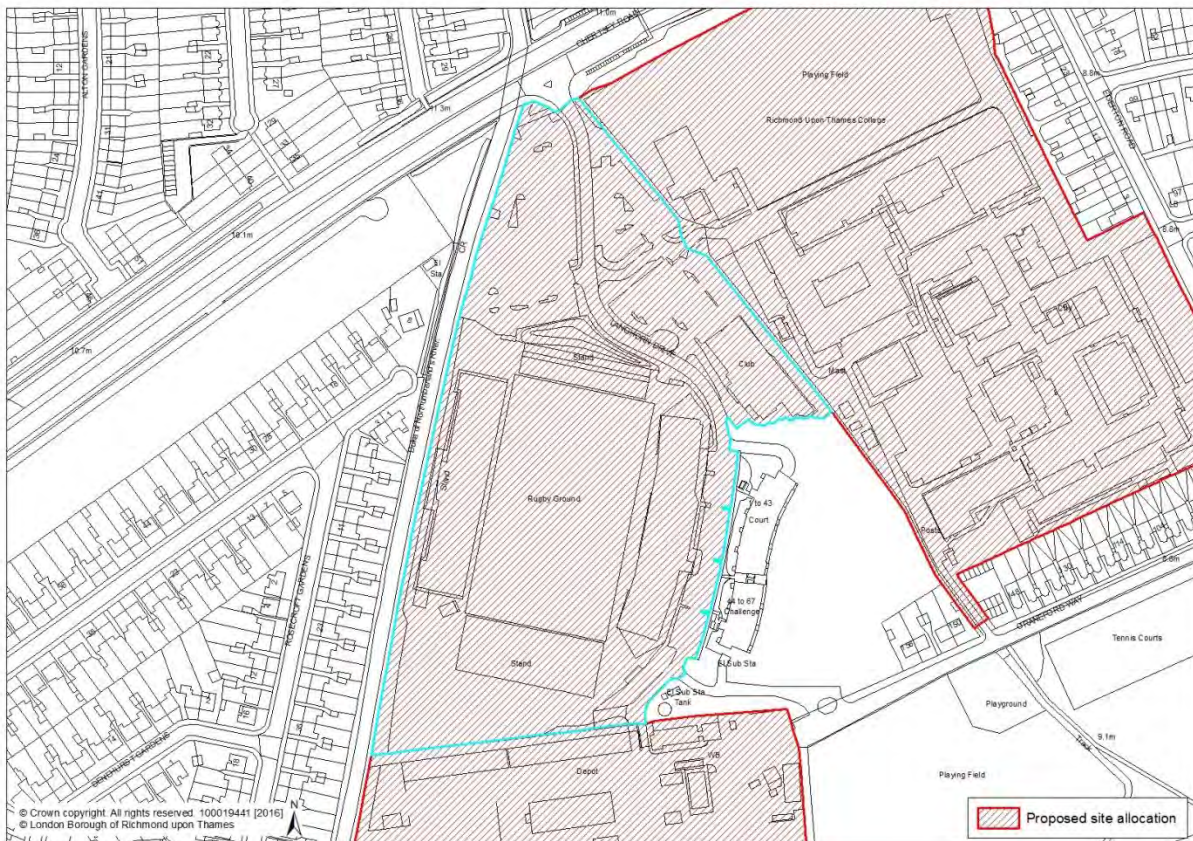
- Some existing facilities are outdated and in need of upgrading/rebuilding
- Need to support and encourage excellent provision of education facilities
- Need to take account of the growing demand for university places
- It is acknowledged that some new additional educational facilities are required but this needs to take account of the protected Historic Park and Garden, Metropolitan Open Land as well as the setting of Strawberry Hill House which is a Grade 1 Listed Building

- **Central Depot, Langhorn Drive, Twickenham**



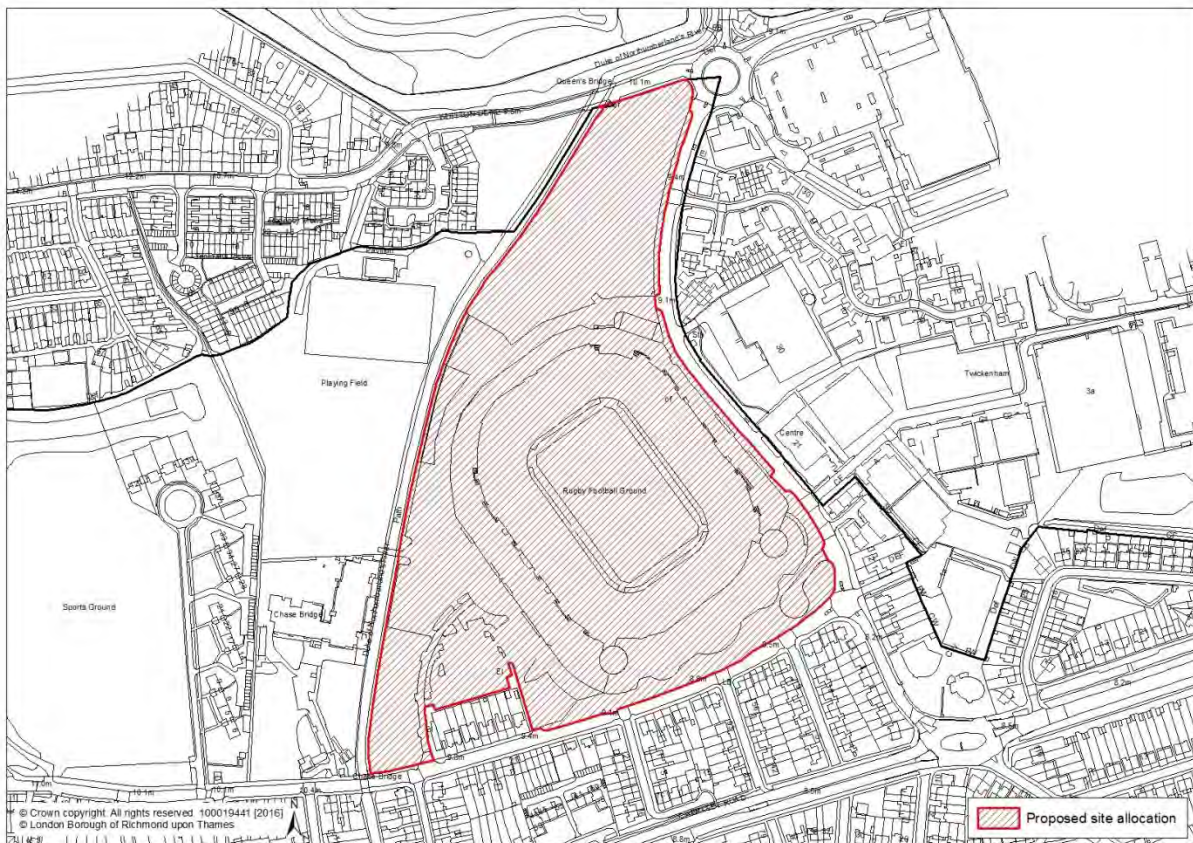
- The majority of the Depot site is a designated waste site, for which the West London Waste Plan applies
- Potential for using part of the site not required for waste management for other suitable uses to address other local needs
- Given the nature of the depot/waste facilities, it would be unlikely to be suitable for residential uses, but there may be scope for considering sports/recreation or small business / incubator units.

- **Harlequins Rugby, Langhorn Drive, Twickenham**



- Need to retain and enhance continued use as a sports ground
- Potential need for associated new facilities including a new north stand, indoor leisure (gym/training facilities), business uses or potentially a hotel
- Additional uses need to be complimentary to the main use of the site as a sports ground

- **Rugby Football Union, Whitton Road, Twickenham**



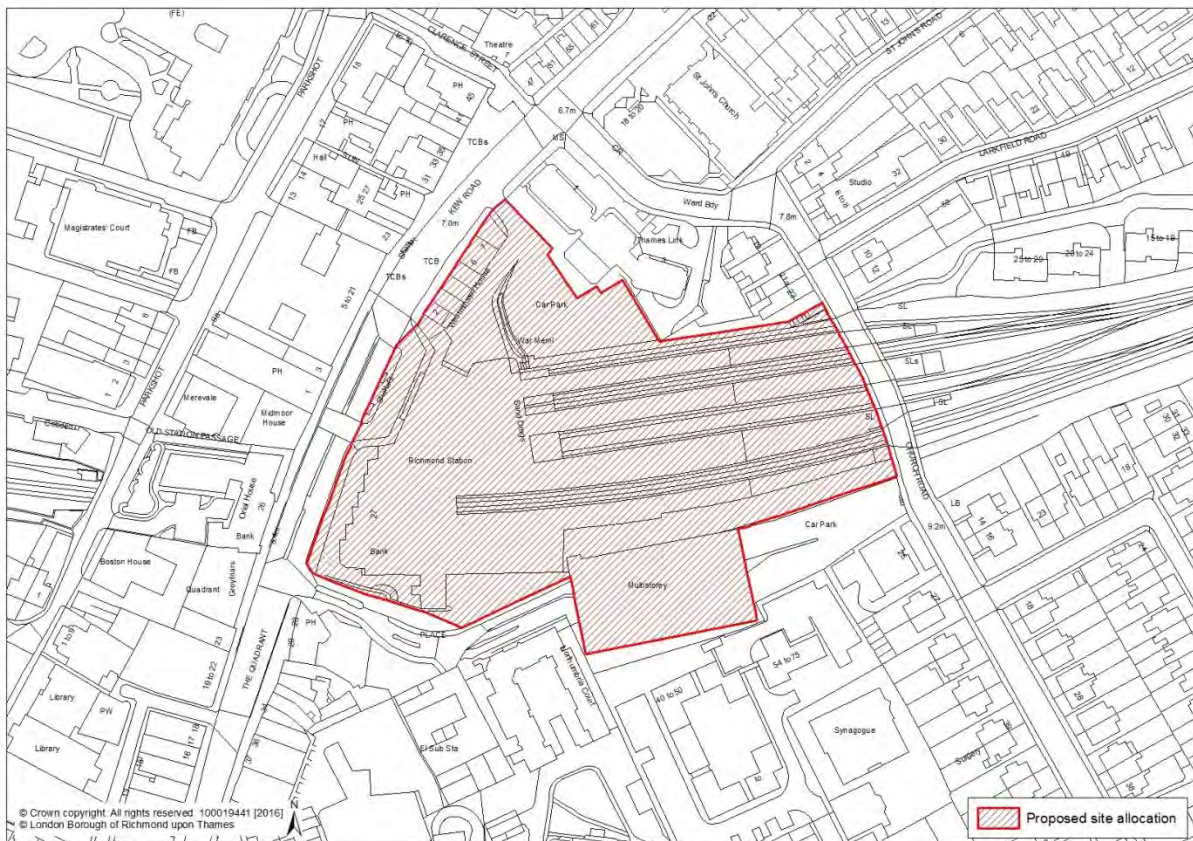
- Need to protect and enhance nationally important sports venue with associated facilities
- Potential need for associated new and complimentary facilities such as a hotel, leisure centre / training facilities
- There is a general need for new office floorspace in the borough and this site may provide the opportunity for businesses or a business park
- Need to retain sufficient parking particularly for coaches, servicing facilities and space for spectators and related services
- Need to protect and enhance the Duke of Northumberland River and the associated Metropolitan Open Land
- If any land is declared surplus to requirements by the RFU, the preference would be for uses that are associated / complimentary to the stadium and/or businesses; any other/new uses would need to be compatible with the main use of the site, i.e. the stadium, and take into account the sewerage treatment works to the north of the site

- **Ryde House, East Twickenham**



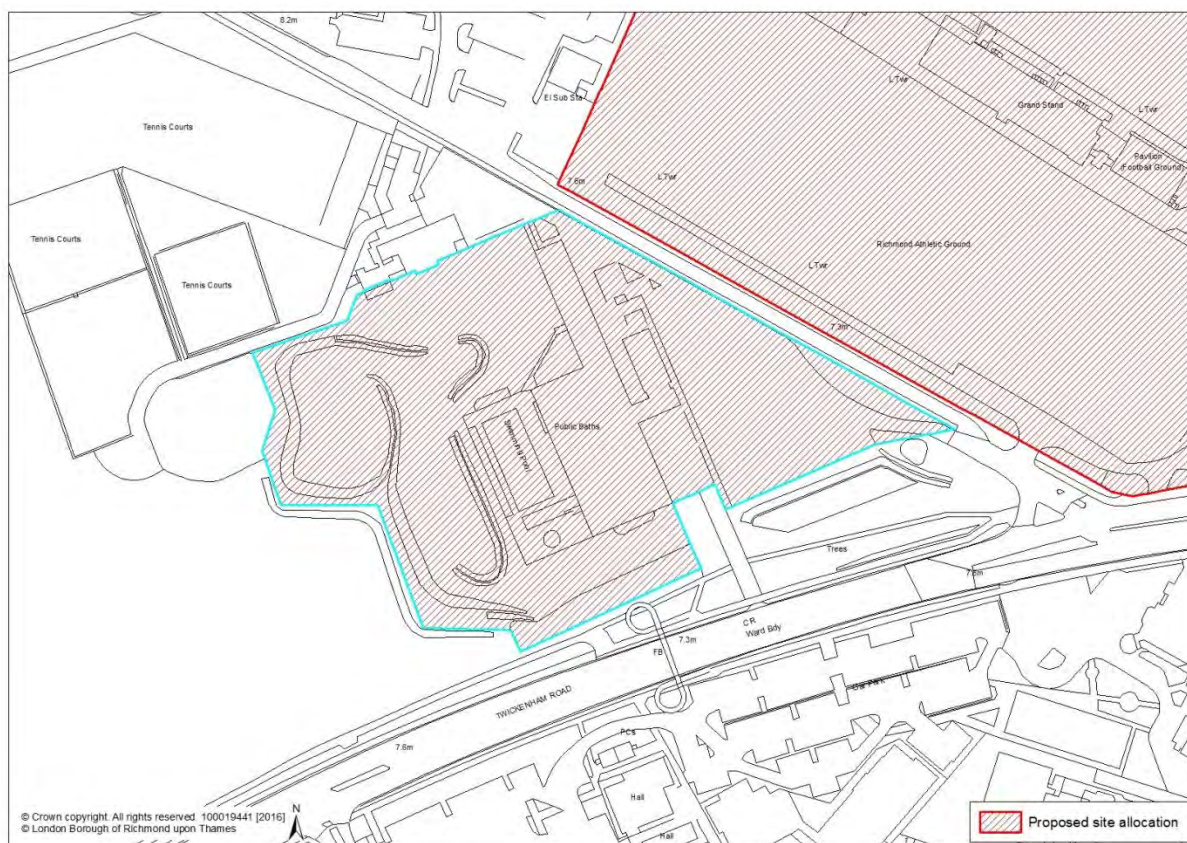
- Located within the East Twickenham Area of Mixed Use
- There is a clear need for a primary school in the East Twickenham area in line with the Council's School Place Planning Strategy
- It is acknowledged that the site is owned by a supermarket and therefore a mixed use scheme, consisting of retail on ground floor and a primary school above, would be sought
- The Retail Study (November 2014) forecasts a requirement for 4,250m² (gross) of Class A1 to A5 uses in local centres/parades in the borough, of which 1000m² (gross) is convenience (food) floorspace. The Retail Study suggests this site could provide up to 1,000m² gross of retail space at ground floor level.

- **Richmond Station and above track, Richmond**



- Key development site within Richmond town centre
- Need for comprehensive redevelopment and transport interchange improvements (both National Rail and London Underground)
- The Retail Study (November 2014) forecasts a requirement for Richmond town centre of around 9,900m² (gross) of Class A1 to A5 floorspace, which is approximately half of the forecast need for the borough as a whole. Richmond station is a key site for delivering this requirement and could accommodate c.10,000m². There is a significant need for transport interchange improvements and employment, commercial, retail, community, leisure, entertaining and housing, including affordable housing
- Is the subject of an adopted development brief which can be viewed at http://www.richmond.gov.uk/richmond_station_planning_brief.pdf

- **Pools on the Park and surroundings, Old Deer Park, Richmond**



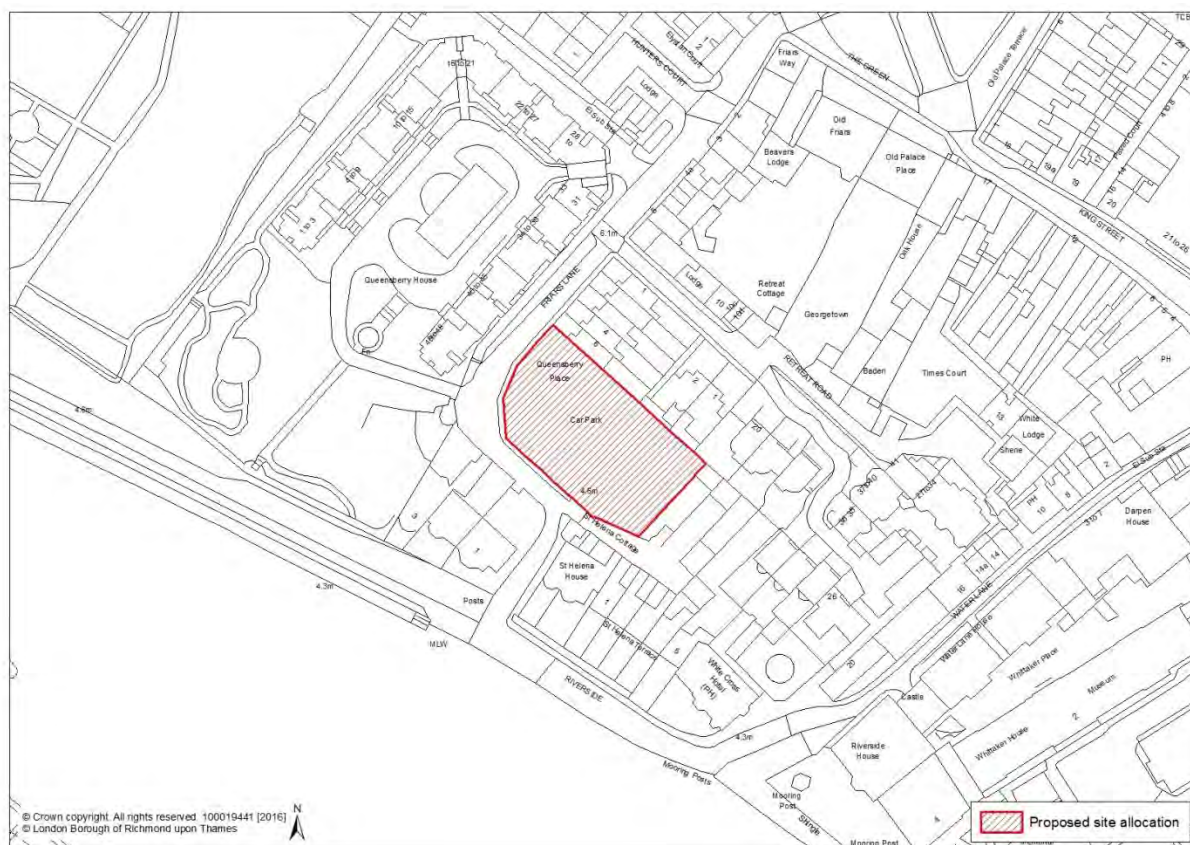
- Borough's Indoor Sports Facility (2015) states that there is a concern regarding the ageing stock; ideally buildings need replacing to offer residents a modern swimming experience; the gym facilities require investment to match the standards in other membership facilities
- The evidence suggests that this facility needs substantial works and upgrading, possibly rebuilding
- Seek intensification of sports uses, additional associated leisure and other complimentary uses may be considered
- A Supplementary Planning Document for the Old Deer Park Area is currently being developed by the Council and anticipated to be adopted in 2016

- **The Richmond Athletic Association Ground, Old Deer Park, Richmond**



- The evidence as set out in the Borough's Playing Pitch Strategy (2015) suggests that the sports ground needs to be retained, but improvements are required in relation to the existing facilities
- Some complimentary and associated uses could be provided on this site
- Seek intensification of sports uses, additional associated leisure and other complimentary uses may be considered
- A Supplementary Planning Document for the Old Deer Park Area is currently being developed by the Council and anticipated to be adopted in 2016

- **Friars Lane Car Park, Richmond**



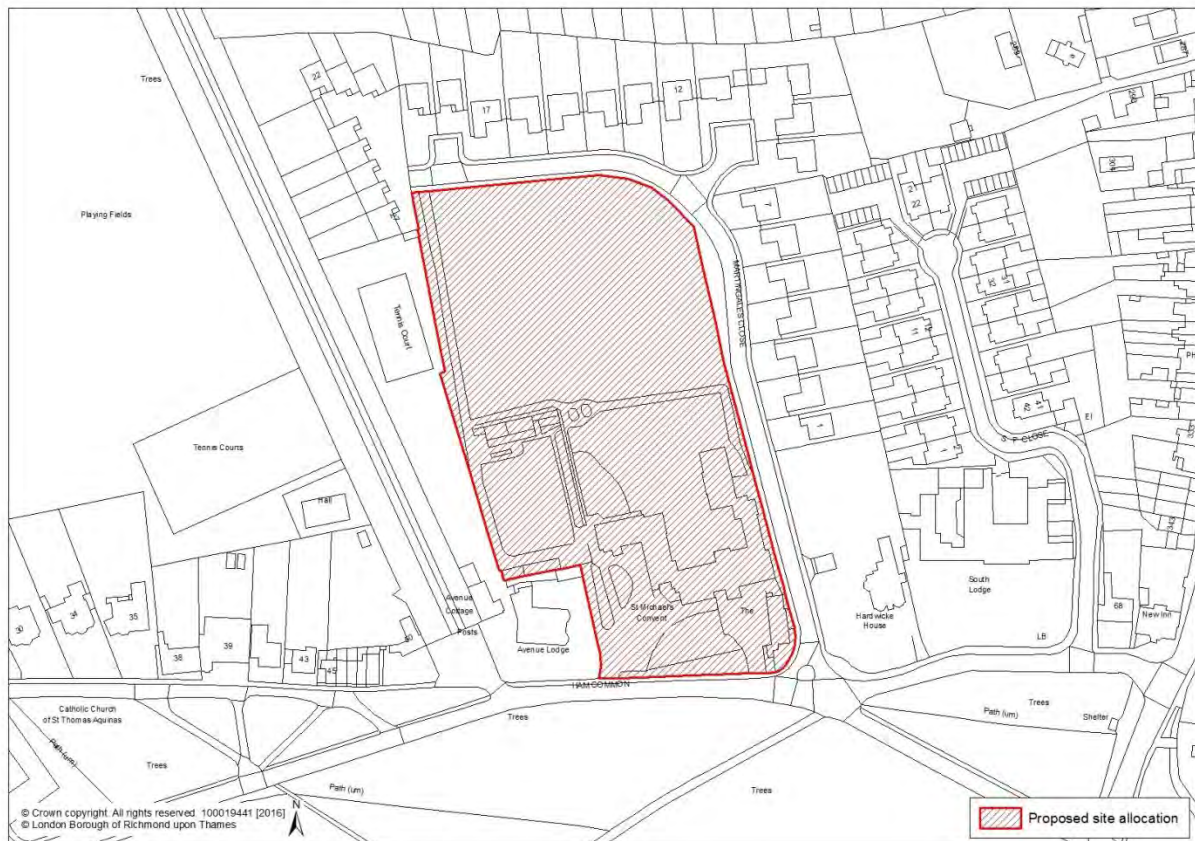
- Under-utilised car park; evidence suggests there is sufficient space in other Richmond car parks
- Need to enhance the Conservation Area, surrounding Grade 2 listed buildings, riverside, including their settings
- Identified need for housing (as set out in the planning brief SPD adopted in 2006)
- Residential use is considered to be the most appropriate use for this site

- **Ham Central Area, Ham**



- There is a clear need for regenerating this area
- Redevelopment of residential units (maximising affordable housing), including social infrastructure uses including a community centre, library, youth centre, clinic and dentists as well as a new green space should be considered
- This site is subject to a more detailed consultation exercise and the results of that consultation will be fed into this Plan
- Need to take account of emerging Ham and Petersham Neighbourhood Plan

- **St Michael's Convent, Ham Common**



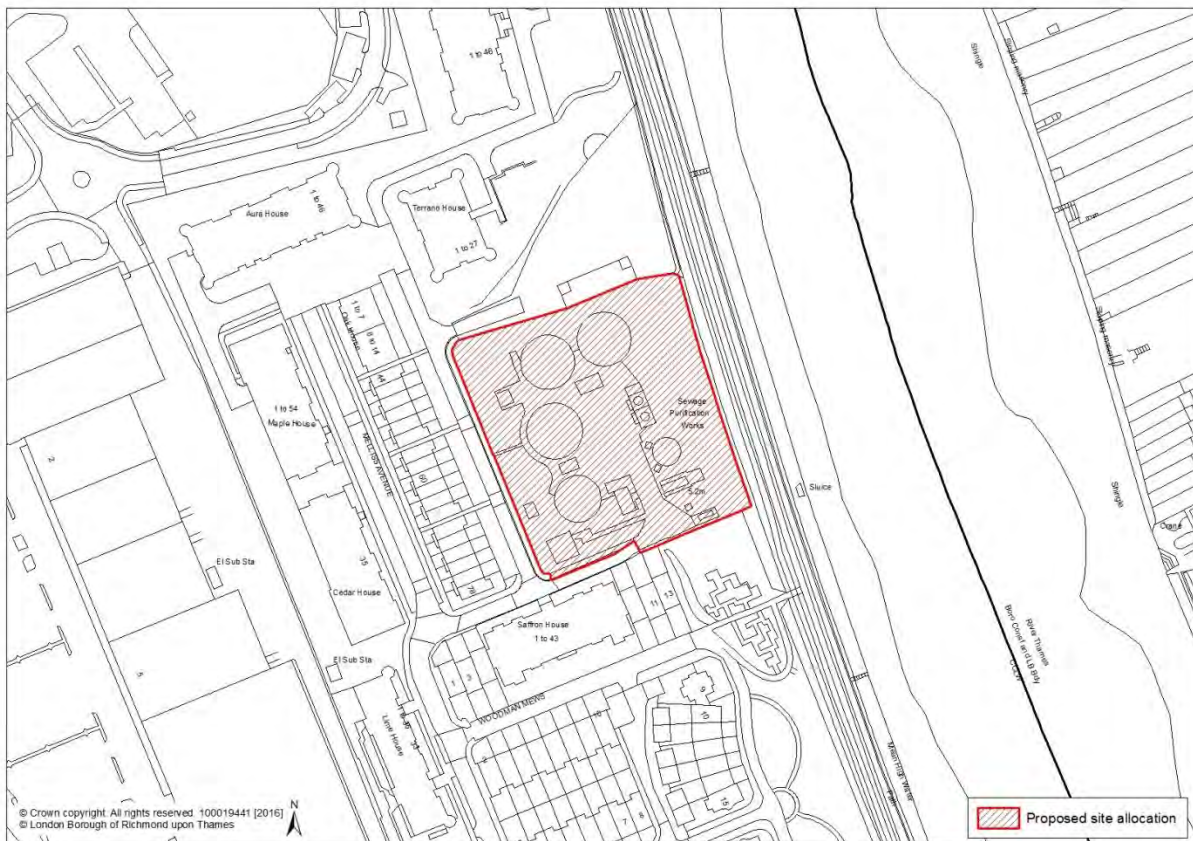
- Site to be declared as surplus to requirements by the Sisters of the Convent
- The listed building will need to be retained
- The gardens are proposed to be designated as Other Open Land of Townscape Importance
- There is a need for housing, including affordable housing as well as social infrastructure and community uses
- Need to take account of emerging Ham and Petersham Neighbourhood Plan

- **Cassel Hospital, Ham Common, Ham**



- Retention and enhancement of listed buildings
- There is a need for housing, including affordable housing as well as social infrastructure and community uses.
- Conversion or potential redevelopment of later additions for residential (including affordable units) and education and/or community uses
- It is acknowledged that any proposal would be subject to the hospital being declared surplus to requirements by the NHS Trust and will depend on their decision on how much of the site they need to retain for their own future needs
- Need to take account of emerging Ham and Petersham Neighbourhood Plan

- **Kew Biothane Plant, Mellis Avenue, Kew**



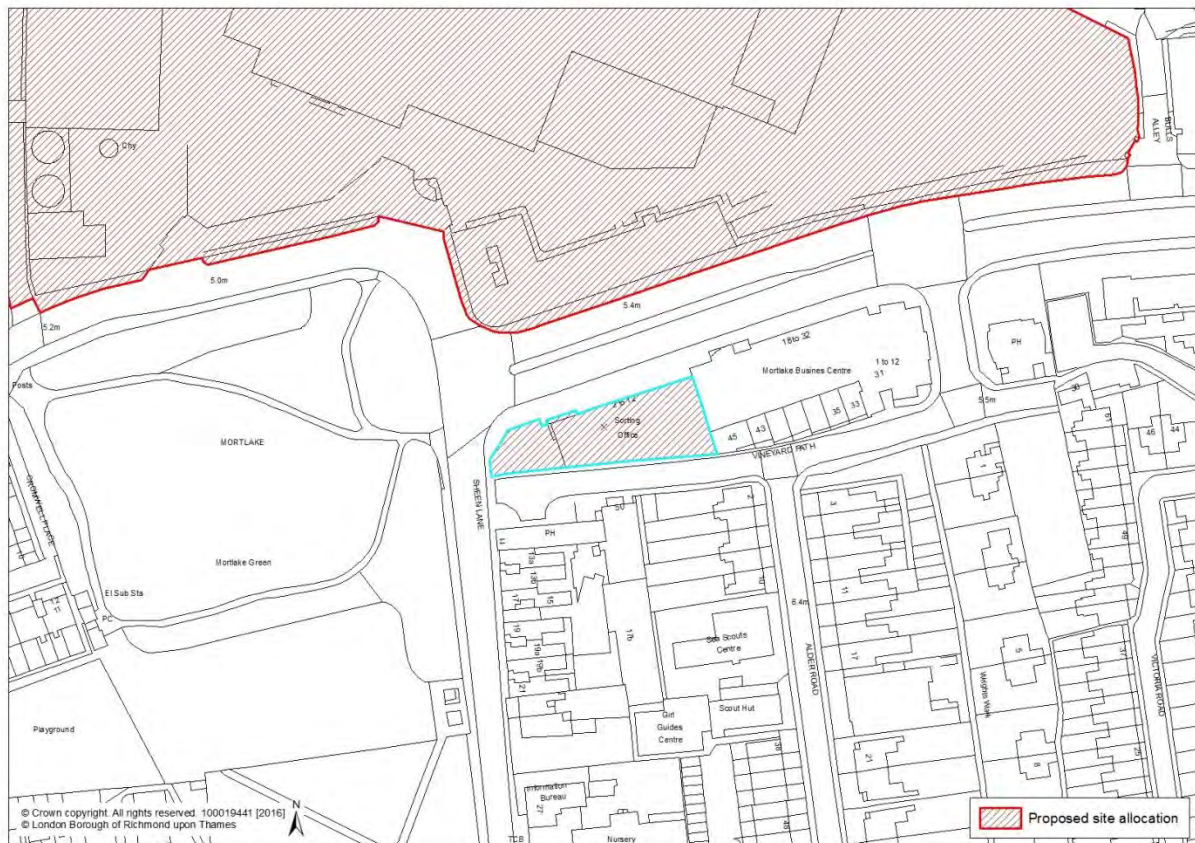
- Site will become surplus to requirements once the operations cease on the Stag Brewery site, which are scheduled to finish at the end of 2015 (the Stag Brewery site has now been marketed and sold)
- Opportunity to redevelop and enhance the environment, whereby there is a need to retain and/or improve the character and openness of the Metropolitan Open Land
- Appropriate uses include residential including affordable housing as well as provision of open space

- **Telephone Exchange, East Sheen**



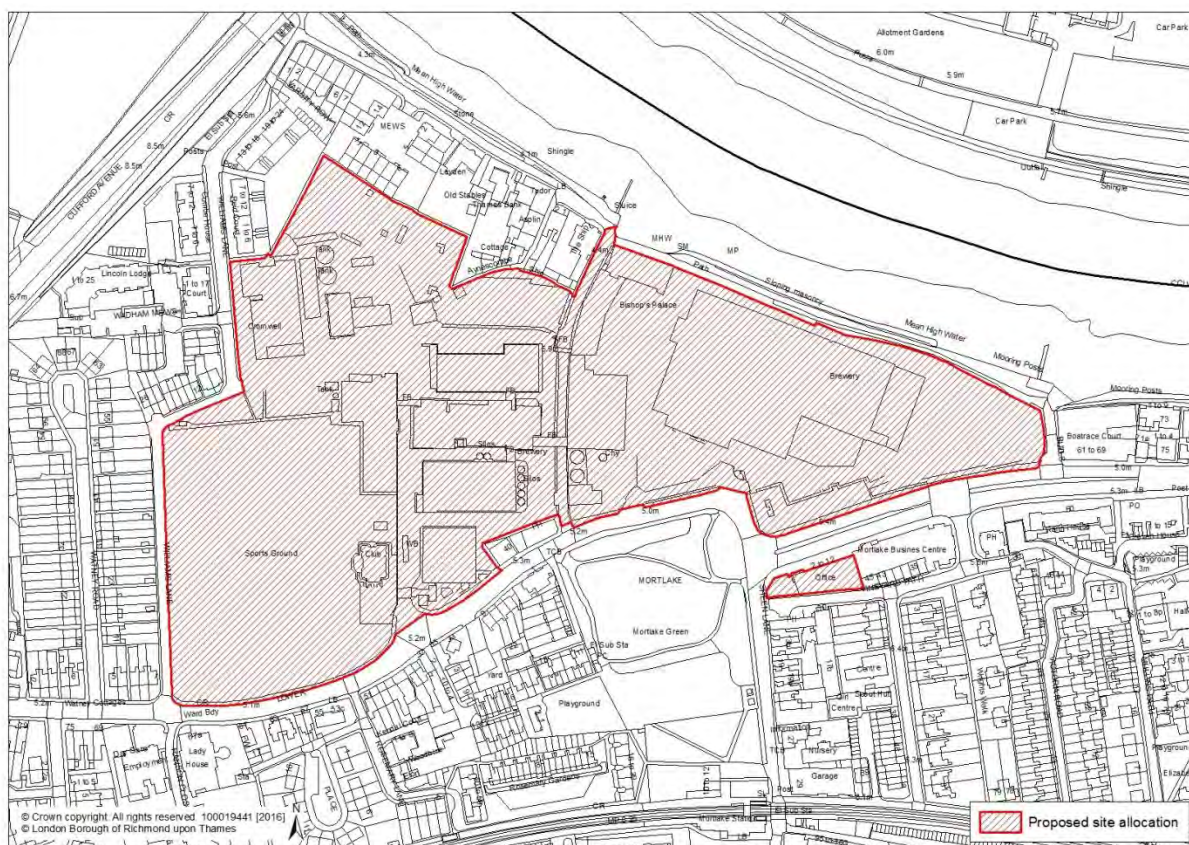
- Site is partly within East Sheen town centre, but has no High Street frontage
- The evidence suggests there is borough-wide need for employment / commercial uses
- There is potential for providing space for offices and housing, including affordable housing, above and to the rear of the site.
- It is acknowledged that any proposal would be subject to the telephone exchange being declared surplus to requirements by British Telecom

- **Mortlake And Barnes Delivery Office, 2-12 Mortlake High Street, Mortlake**



- The evidence suggests there is a need for employment and social infrastructure uses
- The site could also provide limited retail on the ground floor
- Residential uses, including maximising affordable housing, could be considered above ground floor
- It is acknowledged that any proposal would be subject to the delivery office being declared surplus to requirements by Royal Mail.

- **Stag Brewery, Lower Richmond Road, Mortlake**



- Brewery operations to cease at the end of 2015; site has been marketed and sold
- The Council adopted a detailed Site Brief (SPD) in 2011, which outlines the vision and objectives; this can be viewed at http://www.richmond.gov.uk/supplementary_planning_documents_and_guidance
- There is a need to create a new village heart for Mortlake
- A mix of uses is expected on this site, including residential (maximising affordable housing), a 6-form secondary school, employment uses (including B1 offices), open space (including links between the river and the town), community and health uses as well as sports and leisure uses (including part of the forecast requirement for A3-A5 uses identified by the Retail Study (November 2014))
- Need to take account of the changing education needs and priority for a secondary school on the Stag Brewery site (instead of a primary school) as set out in the Council's School Place Planning Strategy (2015)
- There may be an opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station (subject to discussions with Transport for London)

- **Barnes Hospital, South Worple Way, Barnes**

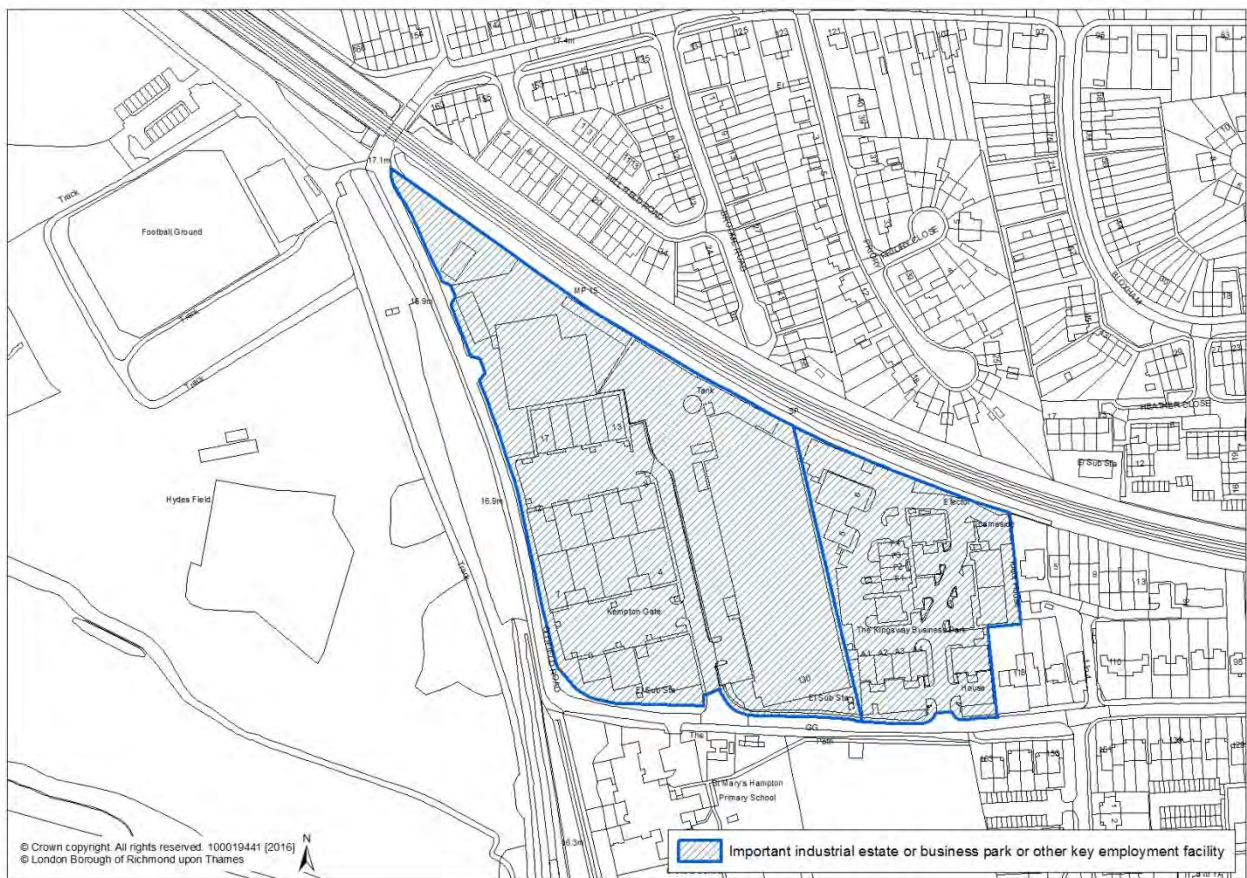


- It is acknowledged that the mix of uses on this site will depend on the Mental Health Trust's decision on how much of the site they need to retain for their own future needs
- As identified in the Council's School Place Planning Strategy (2015), there is a particular need for a primary school in this area; this is the only site that could accommodate a new school in this area
- Priority is for a new primary school; some residential provision, including potential for extra-care housing, is likely to be part of the mix of uses

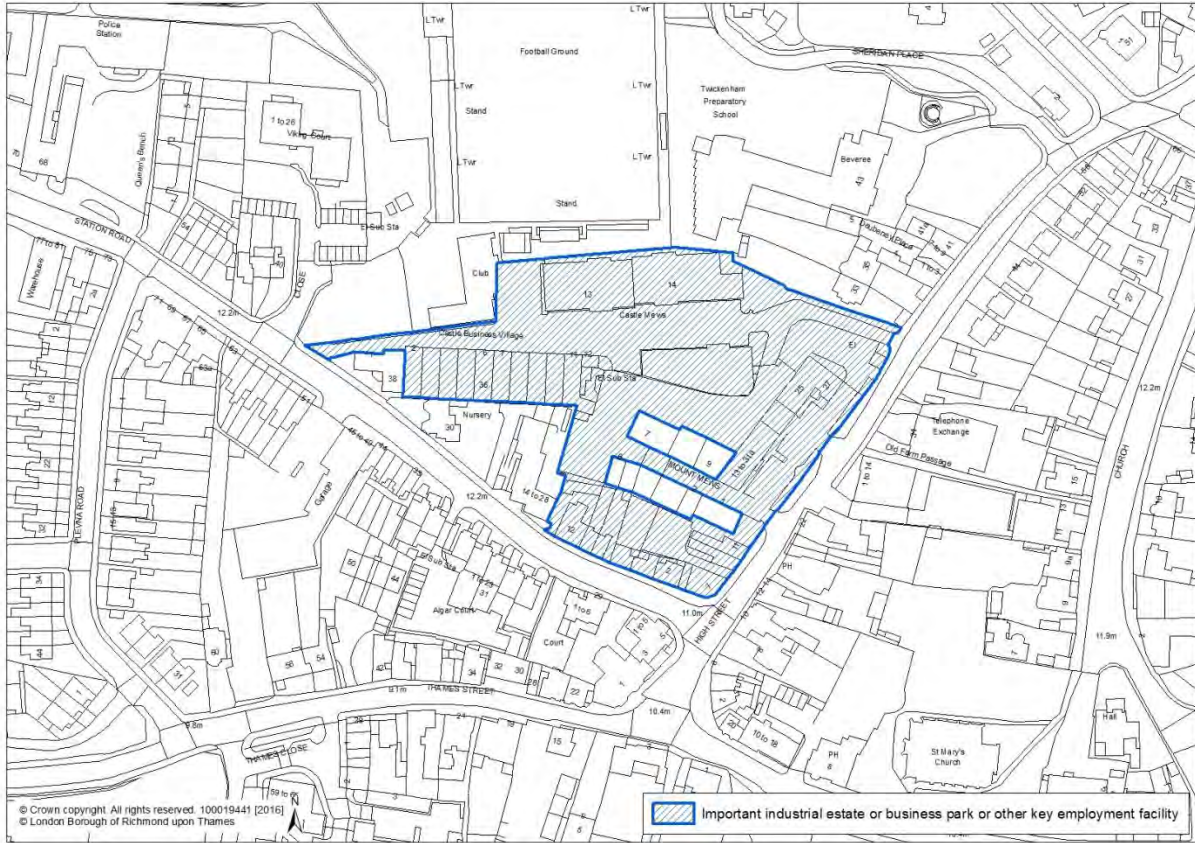
APPENDIX 3 – IMPORTANT INDUSTRIAL ESTATES, BUSINESS PARKS, CREATIVE INDUSTRIES AND OTHER KEY EMPLOYMENT FACILITIES

This appendix sets out the details of the sites that have been identified as important industrial estates, business parks, creative industries and other key employment facilities.

- **Kempton Gate Business Park, Oldfield Road, Hampton**
- **Kingsway Business Park, Oldfield Road, Hampton**



- **Castle Business Village, Castle Mews, Station Road, Hampton**



- **Hampton Hill Business Park, High Street, Hampton Hill**



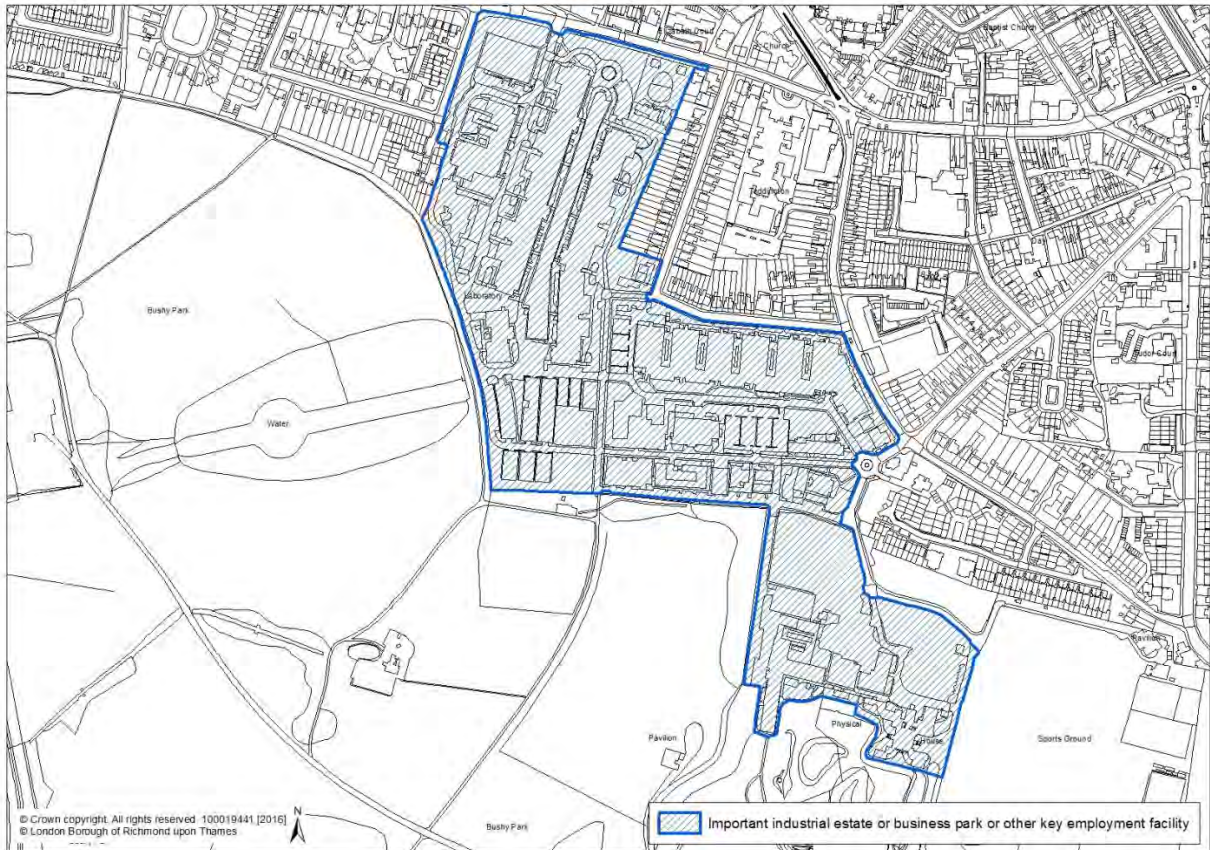
- **St Clare Business Park, Holly Road, Hampton**



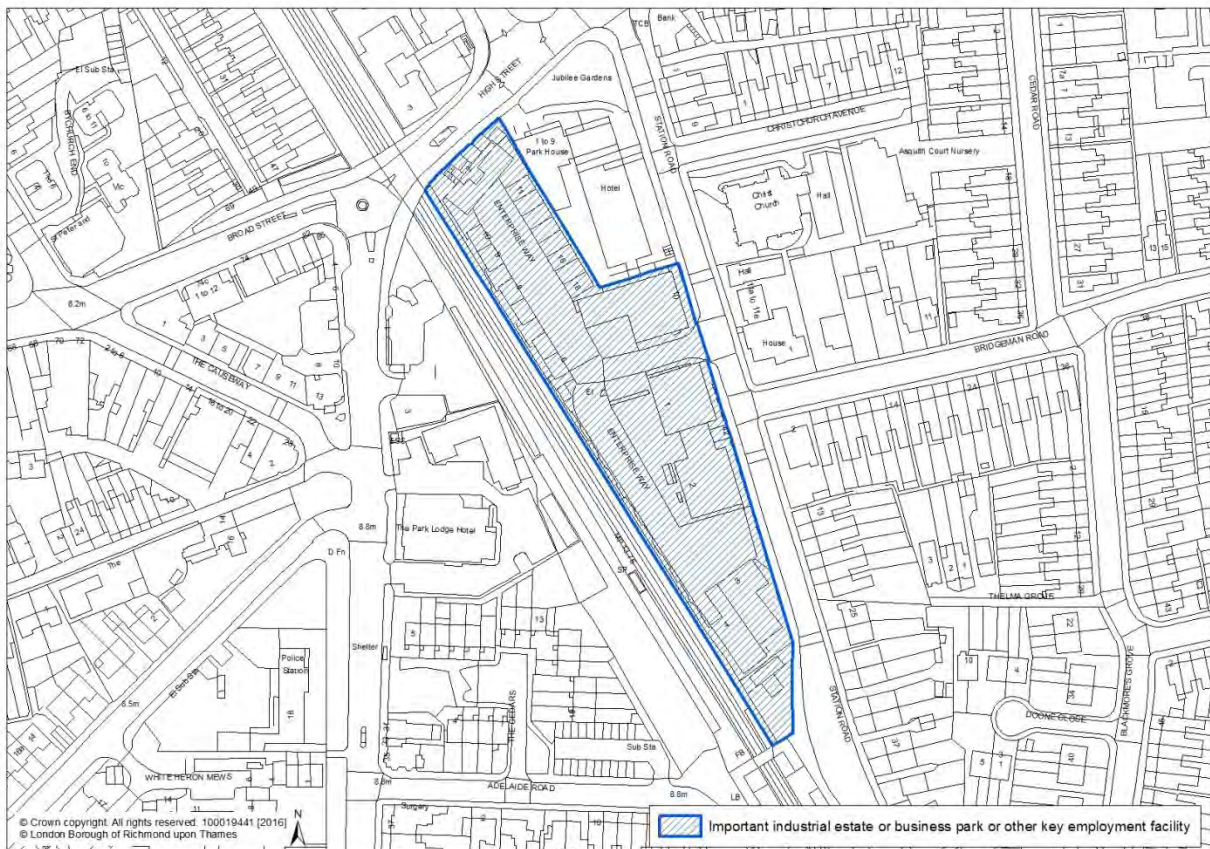
- **50-56 Waldegrave Road, Teddington**



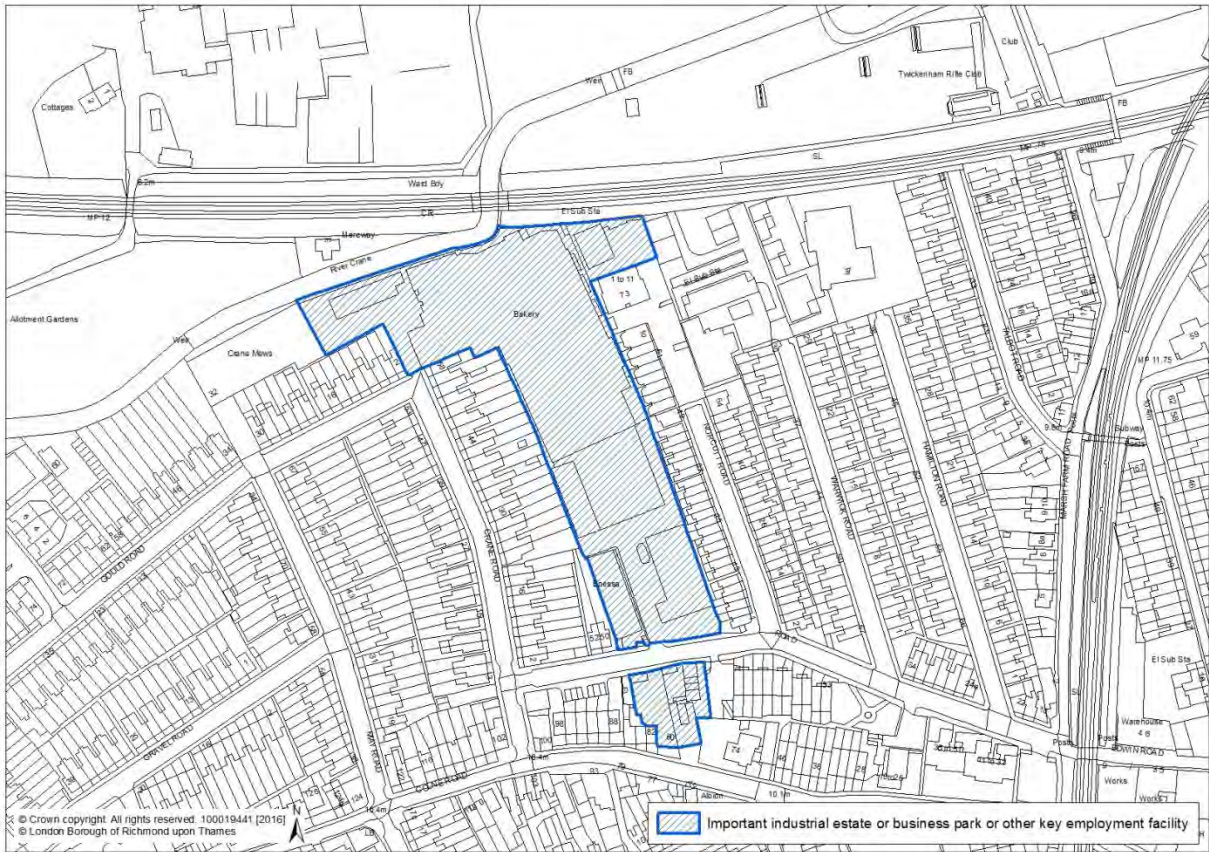
- **National Physical Laboratory, Hampton Road, Teddington**



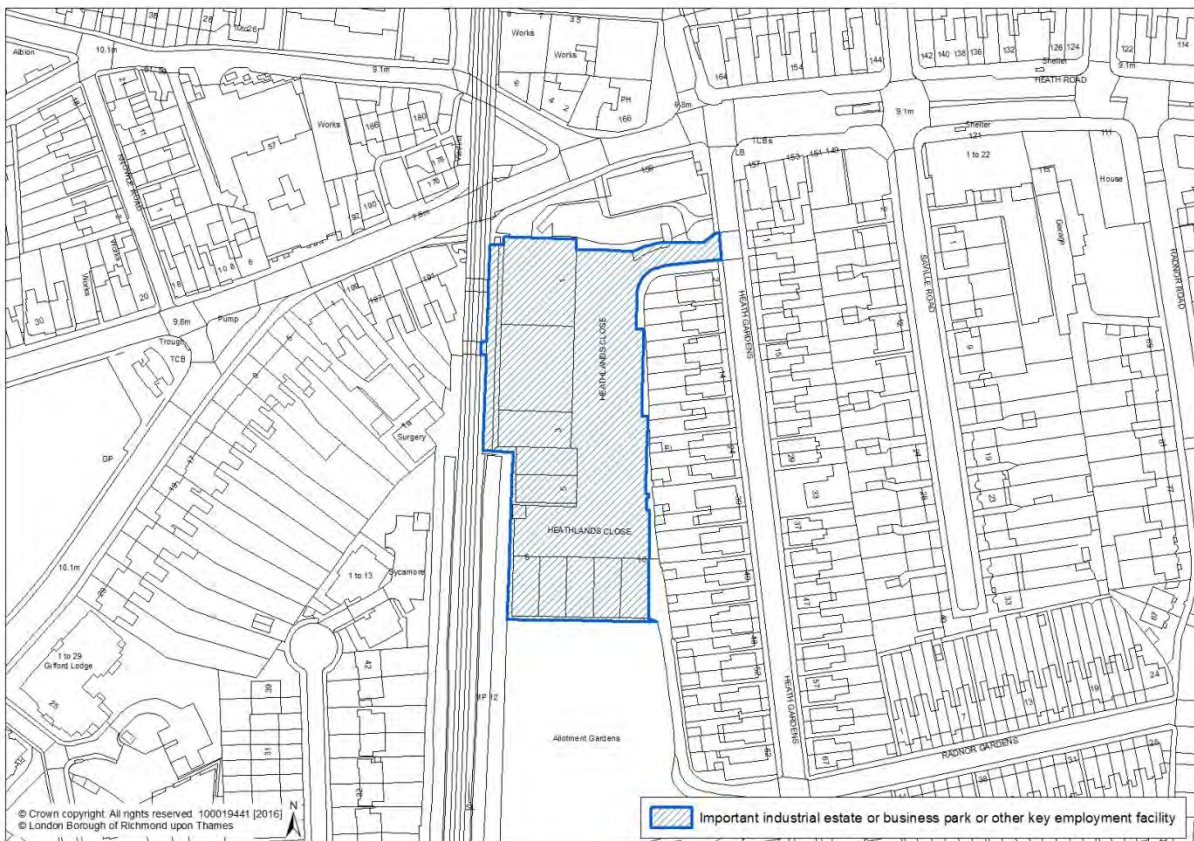
- **Teddington Business Park, Station Road, Teddington**



- **West Twickenham cluster (including Gregg’s Bakery and surroundings), Twickenham**



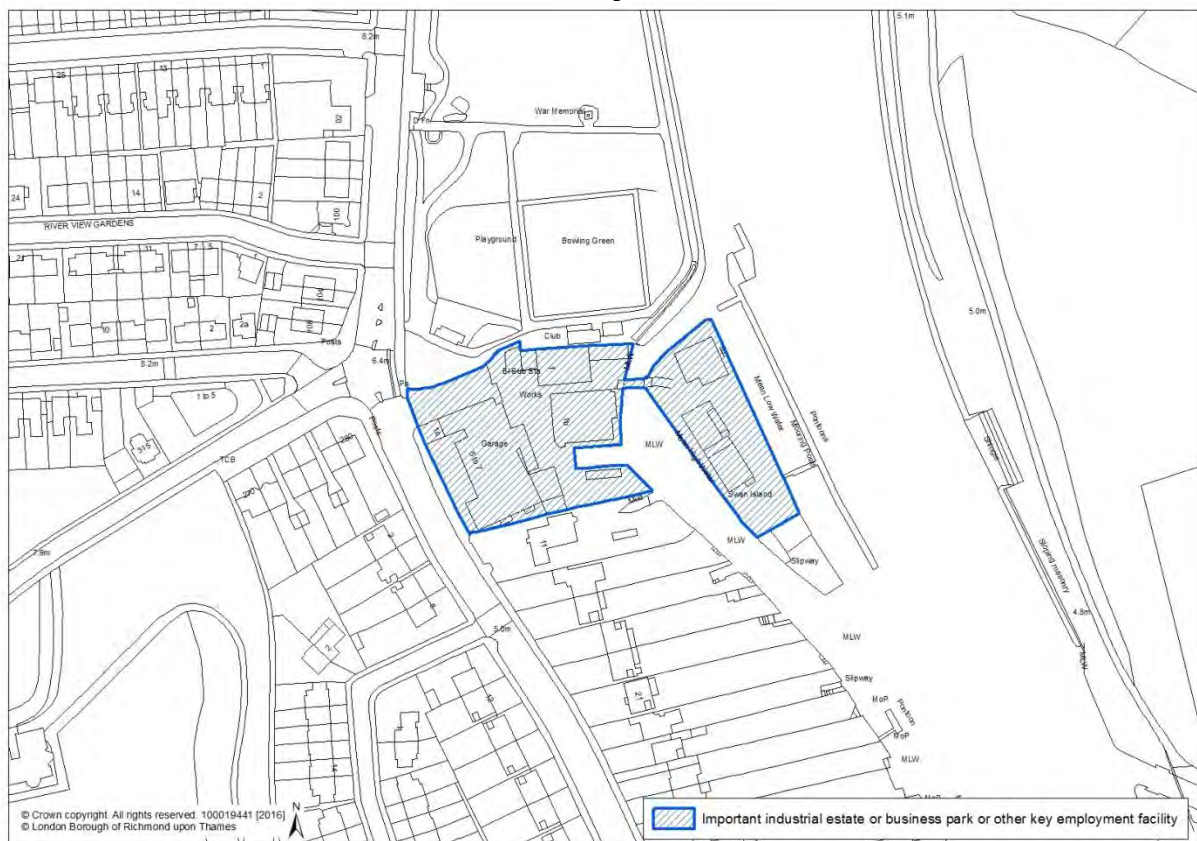
- **Heathland Industrial Estate, Twickenham**



- **St George's Industrial Estate, The Green, Twickenham**
- **Mereway Road Industrial Estate, Twickenham**



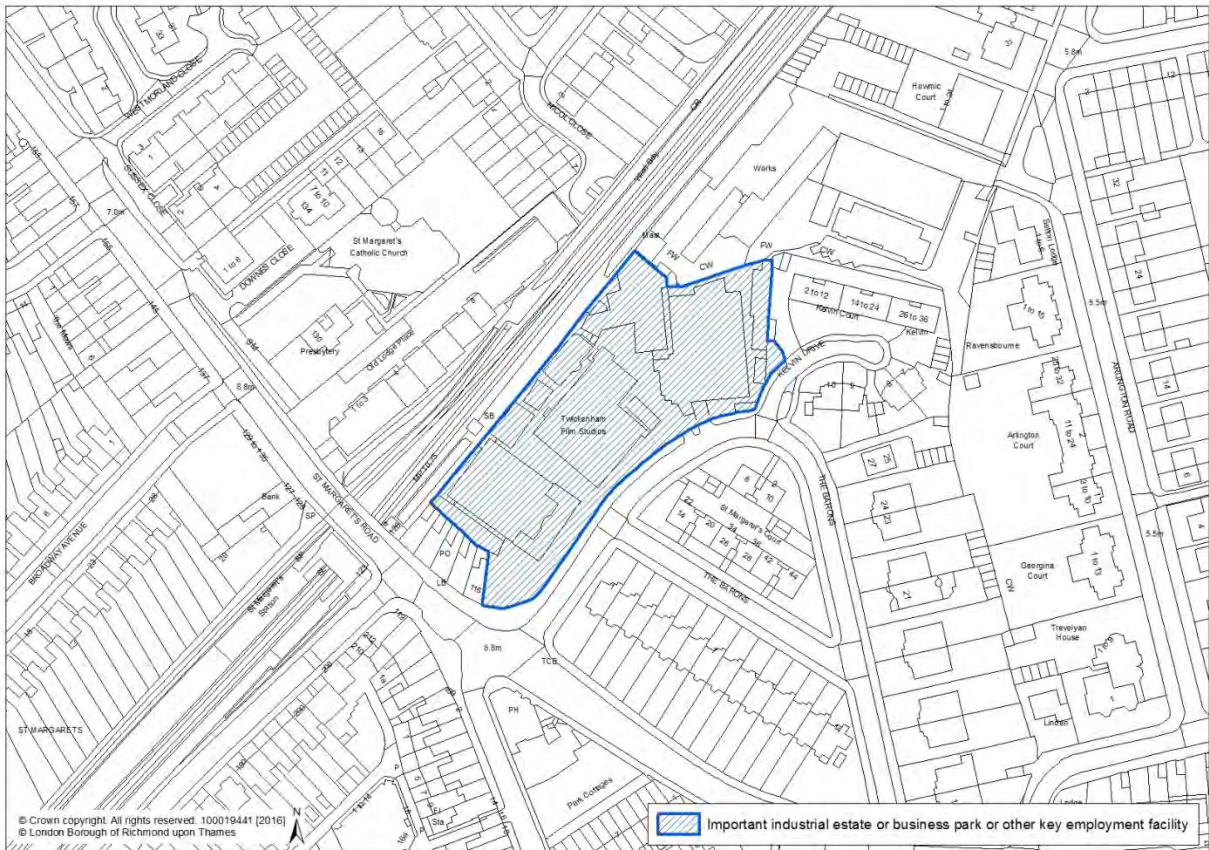
- **Swan Island Industrial Estate, Strawberry Vale, Twickenham**



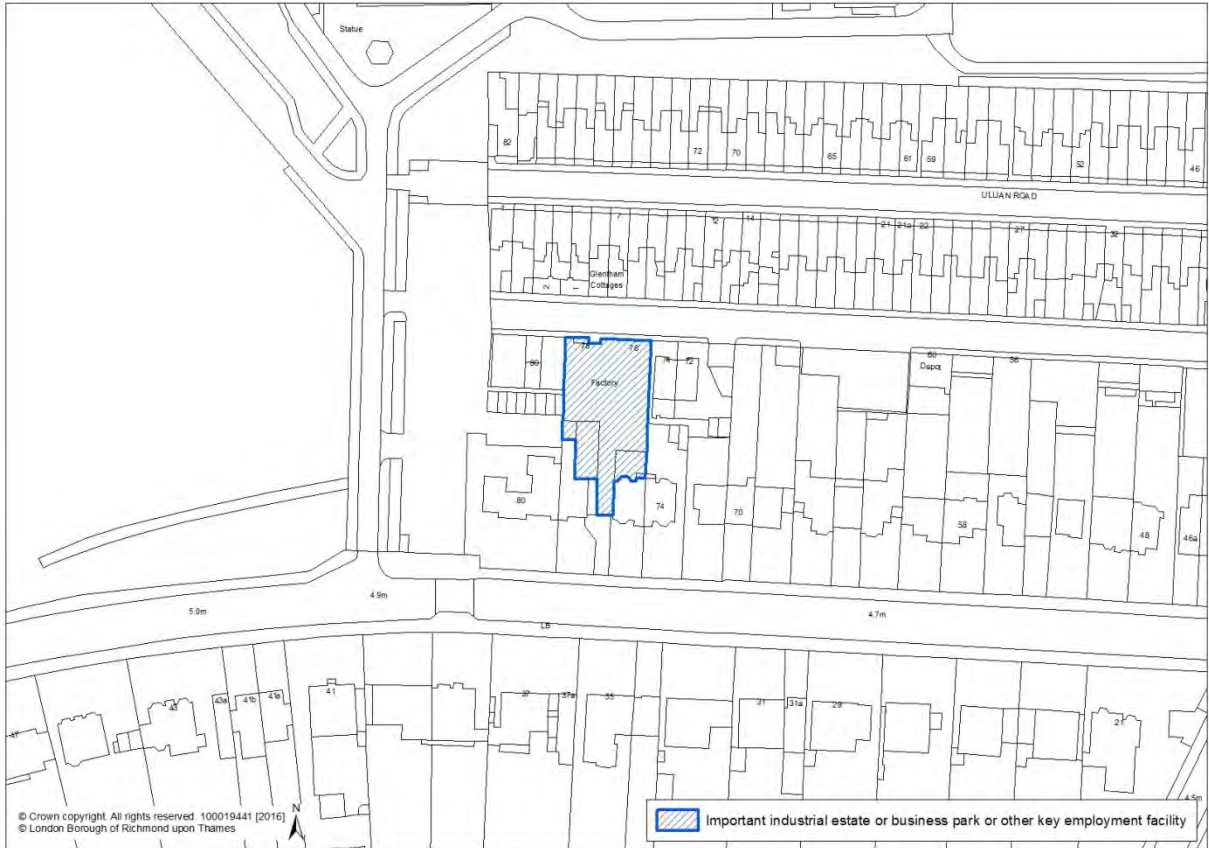
- St Margarets Business Centre, Winchester Road, St Margarets**



- Twickenham Film Studios, St Margarets**



- **Glenthams Road, Barnes**



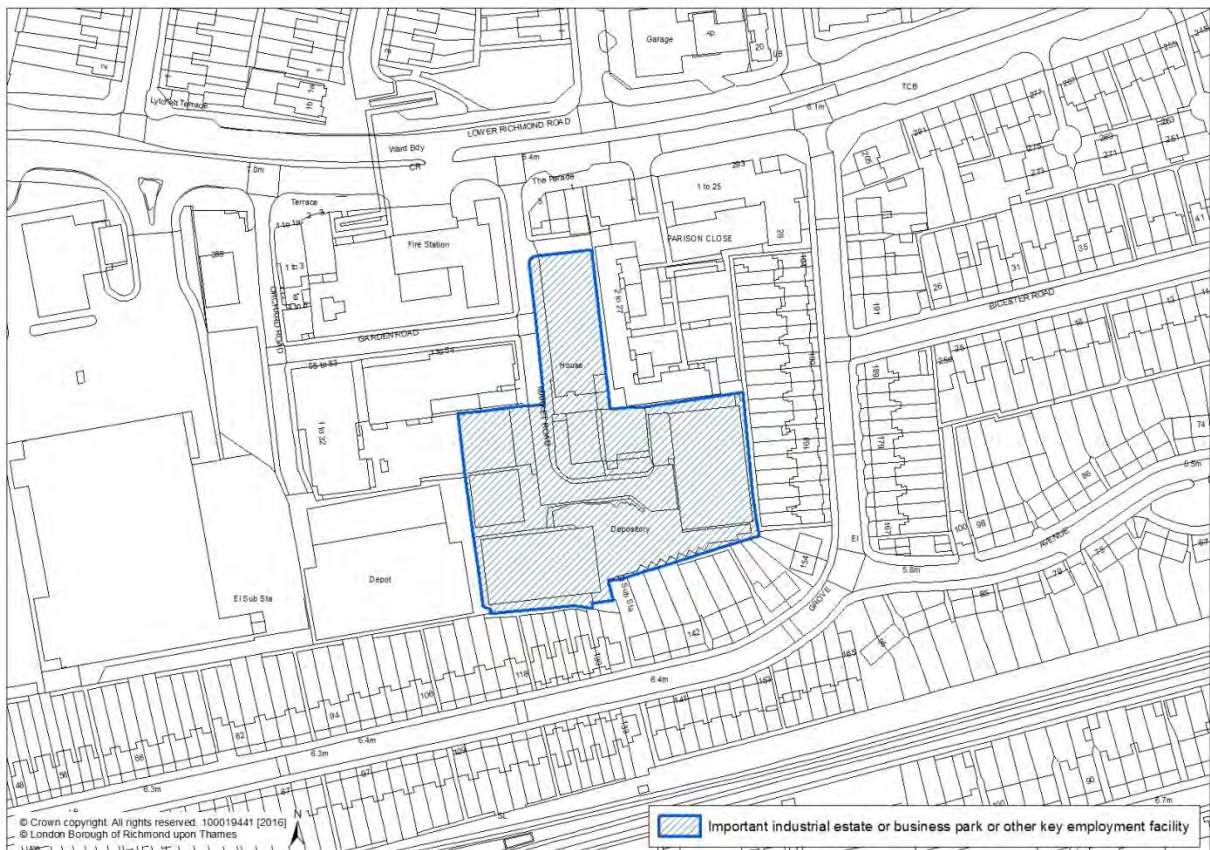
- **Sandycombe Centre, Sandycombe Road, Kew**



- **Marlborough Trading Estate, Mortlake Road, Kew**



- **Market Road, Richmond**



APPENDIX 4 – CONTEXT FOR BOROUGH STRATEGIC HOUSING MARKET ASSESSMENT

The purpose of this appendix is to set the context for the borough Strategic Housing Market Assessment (SHMA), which is being undertaken in 2015/16.

Policy requirement

The [National Planning Policy Guidance](#) (NPPG) states needs should be assessed in relation to the relevant functional area, i.e. housing market area, functional economic area in relation to economic uses, or area of trade draw in relation to main town centre uses (paragraph 8). A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. It recognises it might be the case that housing market areas overlap, and that the extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority administrative boundaries (paragraph 10).

London context

The London Borough of Richmond upon Thames forms part of the wider London Housing Market Area. The objective assessment for the London HMA was carried out by the GLA in the [London SHMA 2013](#). The SHMA sets out an estimate of London's current and future housing requirements, at the Greater London level only. The London SHMA recognised that while the London housing market is accepted to cross the regional boundary, practical considerations including data availability and the precise identification of the market area favour limiting the study to the Greater London area, in line with previous such studies and with common practice both within London and in neighbouring areas.

The [Inspector's Report](#) into the Further Alterations to the London Plan found other than fine tuning regarding local need relating to the size and type of property and tenure, there is no need for each Borough to duplicate the work done by the GLA and produce their own individual assessment of overall need. The [London Plan](#) (March 2015, consolidated with alterations since 2011) at paragraph 3.47 recognises Boroughs' local and sub-regional SHMAs may identify local variations which depart from the broad patterns of need identified in the London wide SHMA.

The borough SHMA will recognise that Richmond operates within this wider London housing market and seeks to consider and identify the more localised market(s) in which the Borough operates.

South West London SHMA

A Strategic Housing Market Assessment for the south-west sub-region (LB Croydon, RB Kingston upon Thames, LB Lambeth, LB Merton, LB Richmond upon Thames, LB Sutton and LB Wandsworth) was undertaken in 2009 and 2010, which explored current and future housing need, demand, supply and affordability; providing insight into the key drivers behind the housing market at a sub-regional level. The [South West London Strategic Housing Market Assessment](#) divided the sub-region between five distinct housing market typologies that reflect different types of market, revealing that the borough is dominated by prime market typologies and lacks areas of market entry, providing evidence of the key issues around affordability.

Broad Rental Market Areas

The Valuation Office Agency (VOA) define Broad Rental Market Areas (BRMA) which are the geographical areas used to determine Local Housing Allowance (LHA) rates. The Broad Rental Market Areas are based on an area where a person could reasonably be expected to live taking into account access to facilities and services for the purposes of health, education, recreation, personal banking and shopping. The areas are defined by looking at these services and the ease to which residents can visit them via a variety of transport modes.

Richmond upon Thames sits across three separate BRMAs – Inner South West London (Barnes, East Sheen and Mortlake areas), Outer South West London (Richmond, Kew, Ham, Twickenham, St. Margaret's, Hampton, Hampton Court, Hampton Wick and Hampton Hill areas) and Outer West London (Whitton). This demonstrates the variation across the borough and the interrelationships with other areas both within and outside of London.

Research by the University of Cambridge on [Analysis of the private rented sector in Richmond upon Thames and surrounding areas](#) (2012) looked at access to the private rented sector for those claiming LHA, finding that accommodation within LHA limits is scarce throughout Richmond upon Thames, and that what there is is concentrated in parts of the west of the borough around Hampton, Whitton and The Nurserylands (section 5). Moving out of Richmond upon Thames is one way in which low income households can find more affordable accommodation, with Hounslow in particular offering more affordable housing and a greater proportion of lets within LHA limits.

The research identified a strong private rented sector in the borough, with a significant element focusing on young professionals and corporate lettings, particularly in the east of the borough with access to good schools and transport links into the City.

House prices and rates of change in house prices

House prices in Richmond upon Thames are some of the highest in the country, and the highest house prices in Outer London following an anomalous band of higher prices continuing out from central London. According to [Land Registry data](#) the average house price reached £652,154 in September 2015.

The summary for Richmond on [Rightmove](#) states:

Last year most property sales in Richmond Upon Thames involved flats which sold for on average £449,643. Terraced properties sold for an average price of £805,800, while semi-detached properties fetched £1,042,427.

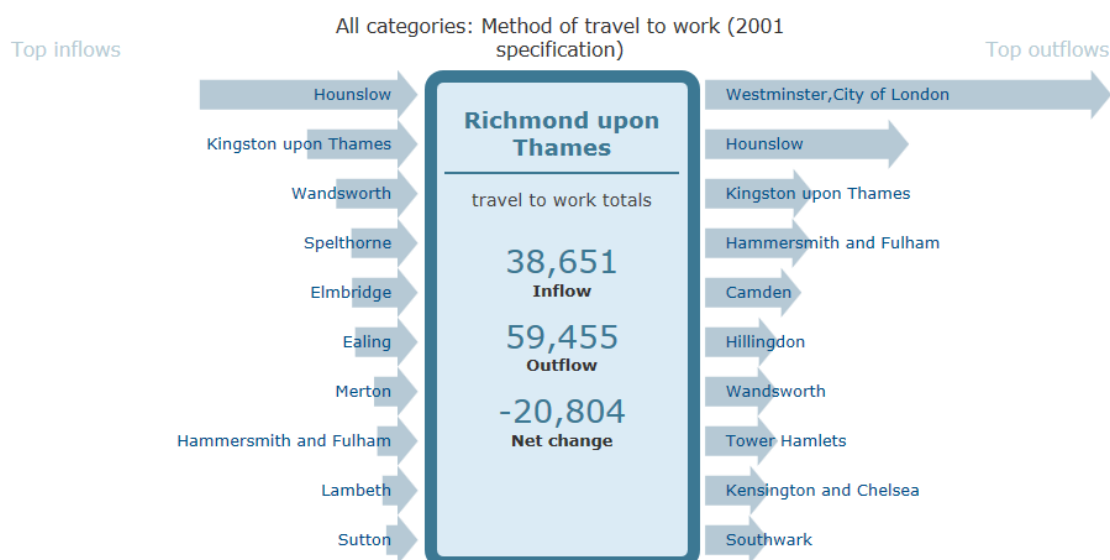
Richmond Upon Thames, with an overall average price of £754,538 was more expensive than nearby Kingston upon Thames (£497,194), Merton (£569,597) and Wandsworth (£673,054). The priciest area within Richmond Upon Thames was Castelnau (£1,633,149) and the least expensive was Hanworth (£286,512).

During the last year, sold prices in Richmond Upon Thames were 7% up on the previous year and 29% up on 2012 when the average house price was £586,268.

The international market and impact of overseas buyers is also relevant. Richmond's [DTZ report](#) informing the Council's Tenancy Strategy acknowledged the international nature of the housing market in Richmond – with estate agents active within the Borough estimating that around 20% of buyers are international.

Travel to Work

Commuting is particularly common from local authorities around London's fringe. The borough's connectivity to Heathrow and Central London by public and private transport shows particular dominant flows, with the borough overall a net exporter of workers.



Commuting totals (all categories: method of travel to work (2001 specification)) for Richmond upon Thames:

- Inflow: **38,651** person(s) commute into Richmond upon Thames from other local authorities in the UK.
- Outflow: **59,455** person(s) commute out of Richmond upon Thames to other local authorities in the UK or abroad.
- Net change: Overall, commuting results in a population decrease of **20,804** in Richmond upon Thames.

Source: [ONS, Census WU03UK - Location of usual residence and place of work by method of travel to work](#)

The [University of Cambridge research on the private rented sector](#) identifies a strong PRS sector in Richmond, focussed on young professionals, corporate lets, which follows the commuter lines from London out into south west London.

This also suggests the functional economic area is interlinked with neighbouring areas.

Migration

The latest ONS population estimates in June 2015 showed births are far outstripping deaths and net international migration is significantly higher than net internal migration (domestic). Given Richmond has the highest house prices in Outer London we expect that residents possibly move outwards from London related to lifestage (family formation) and affluence – either moving from the private rented sector into owner occupation (first time buyers) into relatively cheaper areas or those already in owner occupation moving into larger family sized properties.

The ONS Migration data – Estimated number of moves during year ending June 2014 shows:

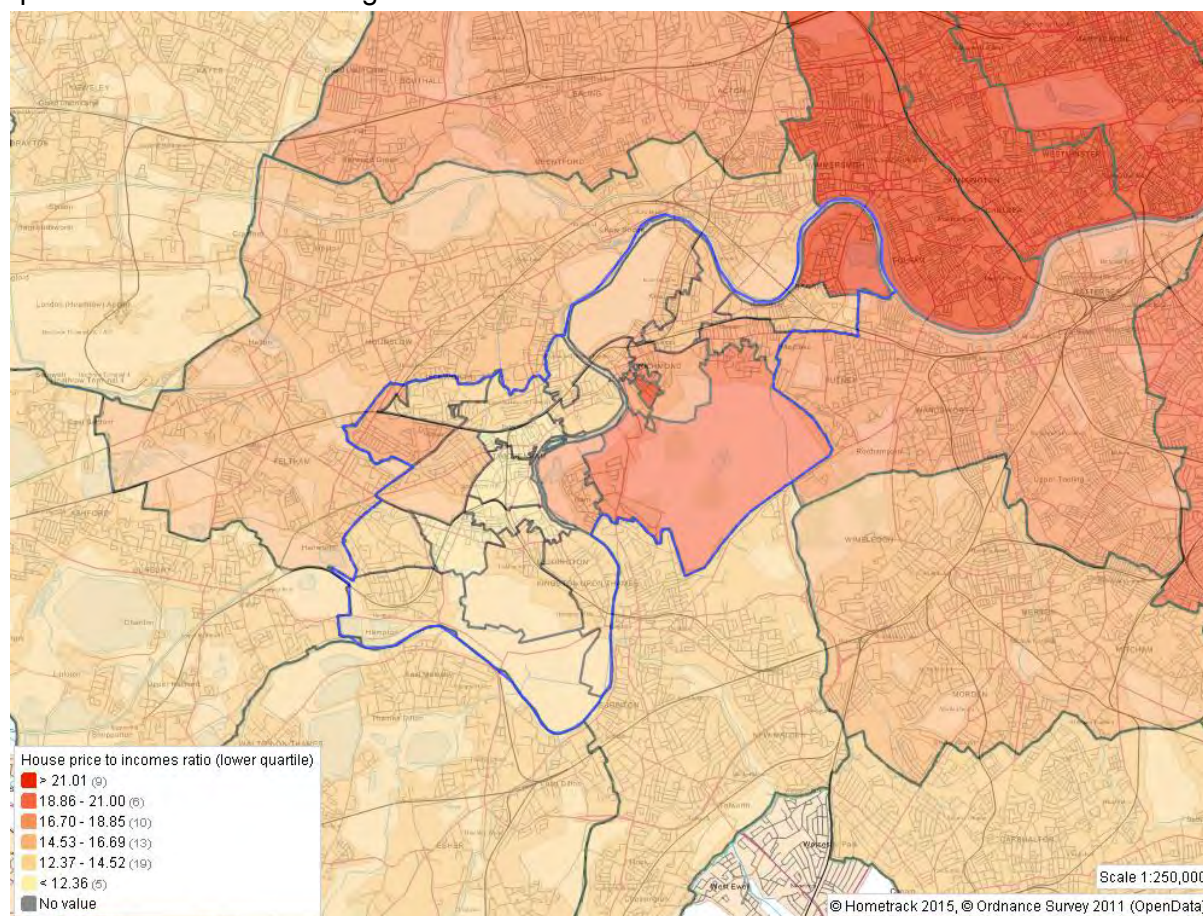
Moves from Richmond (estimated)	Moves into Richmond	Net movement from Richmond
To Kingston 830	From Kingston 620	210
To Elmbridge 750	From Elmbridge 270	480
To Epsom and Ewell 120	From Epsom and Ewell 70	50
To Mole Valley 90	From Mole Valley 30	60
To Spelthorne 520	From Spelthorne 230	290

		Net Movement into Richmond
To Ealing 260	From Ealing 530	270
To Hounslow 1340	From Hounslow 1650	310
To Hammersmith & Fulham 240	From Hammersmith & Fulham 650	410
To Kensington & Chelsea 150	From Kensington & Chelsea 340	190
To Merton 200	From Merton 220	20
To Wandsworth 710	From Wandsworth 1200	490
To Westminster 140	From Westminster 320	180
To Camden 130	From Camden 300	170
To Brent 80	From Brent 210	130
To Lambeth 260	From Lambeth 430	170
To Southwark 130	From Southwark 270	140
To Tower Hamlets 110	From Tower Hamlets 200	90

Flows are highest from Richmond to Hounslow, Kingston, Elmbridge, Wandsworth and Spelthorne. Flows into Richmond are highest from Hounslow, Wandsworth, Hammersmith and Fulham, Kingston, and Ealing.

Affordability

Considering lower quartile house prices to income, house prices in the most expensive areas of the borough are more than 20 times that of the income of the lowest earners in the borough. In the cheapest wards, house prices are still over 12 times higher than lower quartile incomes. According to Hometrack data:



Next Steps

It is recognised therefore that the borough is inter-connected with many neighbouring areas. There are differing patterns and relationships – split across three BRMAs, unique house prices and affordability issues in outer London, travel to work and migration patterns (including international element) which show inextricable links sometimes in differing directions. The Council's view is that the basis of work should be at borough level, informed by the London SHMA and recognising the overlaps with other housing market areas to create a detailed picture of local need.

Further data analysis on these themes will be developed in the borough SHMA work, to inform the Local Plan Review and discussions will be held with Duty to Cooperate bodies. This will understand the relationship with neighbouring areas within the housing sub-region including Kingston & NE Surrey, Wandsworth and Hounslow, and the Greater London Authority (GLA), including an understanding of population projections considering trend-based population projections based on short-term and longer-term migration trends.