

Summary of place-based strategies and site allocations, and policies, outlining main changes to adopted Local Plan.

Note this summary has been produced to inform understanding of the approach in the new Richmond Local Plan. It is not exhaustive and policies should be read in full in particular to determine policy requirements for particular proposals on a site by site basis. Text in red summarises the main changes between the 'Pre-Publication' and 'Publication' versions.

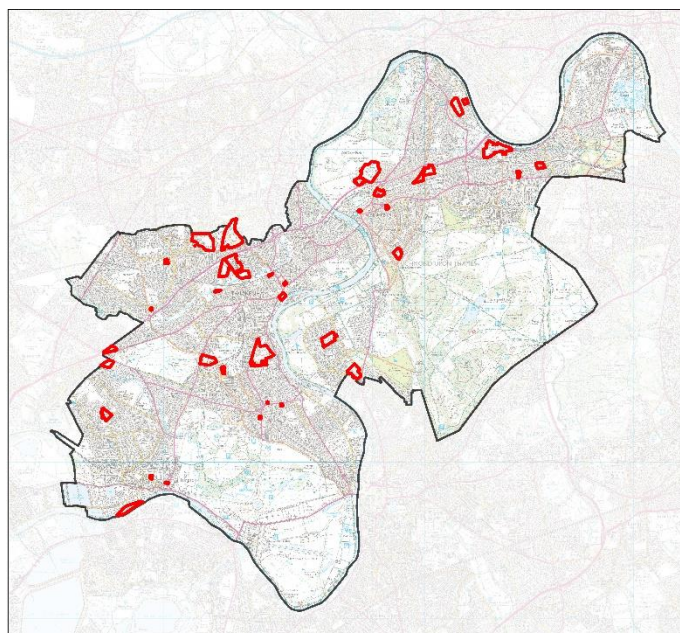
Spatial Strategy, Place-Based Strategies and Site Allocations

Policy 1. Living Locally and the 20-minute neighbourhood: new policy setting out overarching approach to achieve living locally, creating environments that focus on ease of active travel and access to public services, taking into account changing high streets and workplaces, and making it clear all development should contribute to the concept. **Amends to clarify including how the policy will be implemented, considering inclusive access for different demographics, preserving land use patterns, how the 800m relates to the borough noting there are no fixed boundaries, and how developers are expected to comply with the policy.**

Policy 2. Spatial Strategy: Managing change in the borough: new policy setting out the continued spatial strategy directing higher density development to sites in the town centres or well-connected places, prioritising previously developed land. Emphasis is on promoting green infrastructure and mitigating the impacts of climate change and protecting the borough's environment, local character and heritage assets. Supporting text details the evidence base around future needs and the borough's constraints and capacity for growth. **Amends to the supporting text include new and updated evidence base figures added into context, including reducing the shortfall in office space to 23,000 sqm. Removal of text detailing what other policy and spatial strategies have been considered in the production of the plans spatial strategy. Update the Key Diagram to reflect updates to other map designations.**

There are place-based strategies covering the whole borough, divided into nine 'high-level' places, each accompanied by the site allocations within that place. **All of the site allocations have been reformatted for clarity.**

Updated Map of all site allocations:



Place-based Strategy for Hampton & Hampton Hill: focus is on retaining the rural feel due to the green spaces and riverside, while offering a more diverse range of community facilities to meet local needs. **Amends to update reference to protection of existing open spaces and recreational pressure on open spaces. Reference to new site allocation.**

Site Allocations:

- **Site Allocation 1. Hampton Square, Hampton** – updated allocation (SA 1), for partial redevelopment / improvement for community, retail and local services, employment and residential uses. **Amended the southern part which is designated as OOLTI/POS removed from the Site Allocation, to clarify approach to car parking and removal of ‘Area of Mixed Use’ boundary related to type of centre.**
- **Site Allocation 2. Platts Eyot, Hampton** – updated allocation (SA 2), for regeneration enhancing existing river-dependent and river-related uses or new business and industrial uses. Notes recent fire on Conservation Area. **Amends to add reference to Green Belt and appropriate restoration.**
- **Site Allocation 3. Hampton Traffic Unit, 60-68 Station Road, Hampton** – updated allocation (SA 3), for business, employment generating and other commercial or social infrastructure uses, retaining BTM. (A new permission has been granted subject to a S106). **Amends to remove wording regarding ‘Area of mixed use’ (station road).**
- **Site Allocation 4. Hampton Delivery Office, Rosehill, Hampton** – updated allocation (SA 4), for employment generating or social and community infrastructure uses. A permission has been granted. **This Site Allocation has been removed, as development is complete.**
- **Site Allocation 5. Carpark for Sainsburys, Uxbridge Road, Hampton** – new site allocation, proposed for MOL release for 100% on-site affordable housing. **Renumbered as Site Allocation 4. Amends to references to permeability and active travel, clarification on approach to car parking, retention of bus stop serving the supermarket and inclusion of rapid charging hubs and/or hydrogen.**
- **Site Allocation 5. Hampton Telephone Exchange, Hampton** – new site allocation, proposed for a mix of uses. **Amends include removal of ‘Area of Mixed’ use boundary.**

Place-based Strategy for Teddington & Hampton Wick: for Teddington focus on continuing to be a community for residents, visitors and business which enjoys links to open space, Royal Parks and River Thames, with a busy district centre. For Hampton Wick focus on retaining sense of identity and offering an attractive mix of facilities, making the most of the location close to the River Thames and Parks. **Additional reference to protection of existing open spaces and associated recreational pressure.**

Site Allocations:

- **Site Allocation 6. Telephone Exchange, Teddington** – updated allocation (SA 5), for commercial/retail at ground floor and employment floorspace such as offices; mixed-use with residential above could be considered. **Amends to add clarity on open space.**
- **Site Allocation 7. Teddington Delivery Office, Teddington** – updated allocation (SA 6), for commercial/retail at ground floor and employment floorspace such as offices, mixed-use with residential above could be considered. **Amended to include offices or other commercial uses, floorspace requirement for convenience floorspace reduced from 810sqm to 111sqm in Teddington, addition of requirement for greened area fronting High Street in reference to biodiversity and visual relief.**
- **Site Allocation 8. Strathmore Centre, Strathmore Road, Teddington** – updated allocation (SA 7), for reprovision of childcare/nursery with affordable housing. (A permission has been granted subject to a S106). **No amends or updates considered necessary.**
- **Site Allocation 9. Teddington Police Station, Park Road, Teddington** – new site allocation, for community/social infrastructure-led mixed-use development with residential. **No amends or updates considered necessary.**

Place-based Strategy for Twickenham, Strawberry Hill & St Margarets: for Twickenham focus on rejuvenating its business and cultural offer, with a new focus at the Riverside. For Strawberry Hill focus is on enhancing the existing character, as is also the focus for St Margarets and East Twickenham. **Amends for clarity and reference to new site allocations and adds additional context for Strawberry Hill including to conserve, enhance identity and improve public spaces. Adds reference to an initial feasibility for a new pedestrian and cycle bridge, with a location now identified. Includes reference to a residential led scheme at the Homebase site on Twickenham Road and social infrastructure uses at Fulwell Bus Depot.**

Site Allocations:

- **Site Allocation 10. St Mary's University, Strawberry Hill** – updated allocation (SA 8), for retention and upgrading for university and associated teaching, sport and student residential accommodation. **Amends in reference to MOL and impact on heritage assets.**
- **Site Allocation 11. Richmond upon Thames College, Twickenham** - updated allocation (SA 9), for redevelopment to provide a new replacement college, science / technology / engineering / maths centre, technical hub, new secondary and special education needs school, sports centre and residential, with protection and upgrading of playing pitch facilities. An outline consent and reserved matters have been granted permission, part implemented the phased scheme. **Updates to reflect recent planning applications relating to coherence of built form and sense of place.**
- **Site Allocation 12. The Stoop (Harlequins Rugby Football Club), Twickenham** - updated allocation (SA10), for continued sports use, with additional facilities including indoor leisure, hotel or business uses, and residential, provided they are complementary to the main use of the site as a sports ground. **Amends to reference pedestrian routes and active travel.**
- **Site Allocation 13. Twickenham Stadium, Twickenham** - updated allocation (SA 11), for continued use and improvement for sports use, with additional facilities including indoor leisure, hotel or business uses provided they are complementary to the main use of the site as a sports ground. **Amends to reference food and beverage and associated retail and entertainment use, highlights the importance of revenue generated and viability of the stadium, pedestrian routes and active travel, building heights and clarifies the approach to car parking as well as working with partners to prevent unacceptable impacts on the local road network.**
- **Site Allocation 14. Mereway Day Centre, Mereway Road, Twickenham** - updated allocation (SA12) for social and community infrastructure uses. **Amend reference to clarify approach to car parking and preference for redevelopment of whole site. Reference to new application recently submitted on the site.**
- **Site Allocation 15. Station Yard, Twickenham** - updated allocation (TW 2), for residential, subject to re-provision of the bus stands. (A permission for residential has been granted on half of the site). **Amend reference to clarify require re-provision of bus standing capacity and drivers' facilities.**
- **Site Allocation 16. Twickenham Telephone Exchange** - updated allocation (TW 5), for mixed use comprising employment, commercial or retail uses to enhance the cultural offering, with residential above. **Reference to Area of Mixed Use in a local centre removed.**
- **Site Allocation 17. Twickenham Police Station** - updated allocation (TW 6), for mixed use including retail or other active frontage and residential to rear. **This Site Allocation has been removed, as the Metropolitan Police Service have confirmed their Estates Strategy is to retain the property.**
- **Site Allocation 18. Twickenham Riverside and Water Lane/King Street** - updated allocation (TW 7), for redevelopment/refurbishment of former pool site to include civic and open space, active frontages at ground floor, retail/leisure/community use with residential, to create a destination and upgrade the Embankment. **Renumbered as Site Allocation 17.**

Amends to reference local views, flood defences, and updates to reflect recent planning applications.

- **Site Allocation 18. Homebase, Twickenham Road, Hanworth** – new site allocation, proposed for a residential-led redevelopment.
- **Site Allocation 19. Fulwell Bus Garage, 82 Wellington Road, Twickenham** – new site allocation, proposed for residential which compliments the bus garage operation and social infrastructure uses.

Place-based Strategy for Whitton & Heathfield: focus on reinforcing established character, ensuring provision of community facilities and transport links. Amends to reference improving cycling safety and air quality.

Site Allocations:

- **Site Allocation 19. Telephone Exchange, Whitton** - updated allocation (SA 13), for employment and social infrastructure use, increasing permeability to the High Street. Renumbered as Site Allocation 20. No amends or updates considered necessary.
- **Site Allocation 20. Kneller Hall, Whitton** - updated allocation (SA 14), for mixed use quarter within protected landscape and heritage significance, opportunity to open up for community access. Links to Kneller Hall Masterplan SPD. Renumbered as Site Allocation 21. Amends to reference office as an appropriate land use, affordable housing as part of any residential scheme, any type of development is sensitive to the heritage assets, and approach to MOL consistent with the SPD. Reference added regarding site being a candidate for Site of Important Nature Conservation and re-provision of current built footprint within MOL in a new building.
- **Site Allocation 21. Whitton Community Centre, Percy Road, Whitton** - new site allocation, opportunity to reprovide community facilities with affordable housing. Renumbered as Site Allocation 22. Amends to reference opportunities for complementary and joined-up services with neighbouring community uses.

Place-based Strategy for Ham, Petersham & Richmond Park: focus on building on identity as a distinct and mixed community, recognising the semi-rural landscape setting, to provide access to opportunities and improve active travel. Reflects the adopted Ham & Petersham Neighbourhood Plan. Amend to reference improvement to riverside environment.

Site Allocations:

- **Site Allocation 22. Ham Close, Ham** – updated allocation (SA 15), supporting regeneration – comprehensive redevelopment with additional residential (including affordable housing). Renumbered as Site Allocation 23. Amends to reference impacts on Ham House, and need to demonstrate positive benefits in townscape and local aesthetic quality and local context.
- **Site Allocation 23. Cassel Hospital, Ham Common, Ham** - updated allocation (SA 16), for social and community infrastructure, or potential for residential. Renumbered as Site Allocation 24. Amend to reference consideration of character and open land.

Place-based Strategy for Richmond & Richmond Hill: focus on retaining and enhancing its unique character, supporting diversification of Richmond town centre including the community and cultural offer, while ensuring the amenity of residents is maintained. Amends to reference four conservation areas, recreational pressures, SSSI, improvement to riverside environment, active travel, reduction of car travel, air quality, closure of House of Fraser and the Conservation Areas. Reference to amount of floorspace required for convenience goods floorspace increased from 1,457sqm to 3,270sqm. Removal of reference to how the pilot Clean Air Zone will shape a further town centre study.

Site Allocations:

- **Site Allocation 24. Richmond Station, Richmond** - updated allocation (SA 19), for improved transport interchange, public realm and mix of town centre uses, including commercial, community and residential above. Renumbered as Site Allocation 25. Amends to reference partnership working with National Rail and TfL, and existing Conservation Area and BTM, and recognise office use is acceptable but may not need to form a substantial element of provision.
- **Site Allocation 25. Former House of Fraser, 16 Paved Court 20 King Street 4 To 8 And 10 Paved Court And 75 - 81 George Street Richmond** - new site allocation, for retail, office/workspace, and leisure/community use, with active ground floor frontages. Reflects extant permission. Renumbered as Site Allocation 26. Site name amended to: Former House of Fraser, Richmond. Amends to include updates to relevant planning applications and requirements for convenience goods floorspace.
- **Site Allocation 26. Richmond Telephone Exchange, Spring Terrace, Richmond** - new site allocation, for residential use maximising affordable housing. Renumbered as Site Allocation 27. No amends or updates considered necessary.
- **Site Allocation 27. American University, Queens Road, Richmond** – new site allocation, for education-led use as priority, followed by community use. Renumbered as Site Allocation 28. Amends to remove reference regarding no heritage designations within main building.
- **Site Allocation 28. Homebase, Manor Road, East Sheen** - new site allocation, for residential-led redevelopment, including high quality public realm. Reflects extant permission. Renumbered as Site Allocation 29. Amend reference to clarify re-provision of bus standing capacity and drivers' facilities, need to engage with TfL, pedestrian routes to encourage active travel, and prevention of unacceptable impacts on the local road network.
- **Site Allocation 29. Sainsburys, Lower Richmond Road, Richmond** - updated allocation (SA 21), for retail and residential uses. Renumbered as Site Allocation 30. Amend reference to clarify approach to car parking, need to engage with TfL, prevention of unacceptable impacts on the local road network, pedestrian routes and encourage active travel.

Place-based Strategy for Kew: focus on maintaining its character, with potential to improve the character at East Kew. Recognises historic settings of Royal Botanic Gardens, Kew WHS and Old Deer Park. Amends to reference improved accessibility as part of Kew Gardens Station upgrade, and the Site Allocations at Pools on the Park including a reference to protection and enhancement of sporting facilities and Richmond Athletic Ground.

Site Allocations:

- **Site Allocation 30. Kew Retail Park, Bessant Drive, Kew** – new site allocation, opportunity for residential-led redevelopment with commercial uses (retail, offices, affordable workspace, leisure) along with improvements to public realm, active transport and links to the River. Renumbered as Site Allocation 31. Amend to reference improving connectivity is subject to feasibility.
- **Site Allocation 31. Kew Biotope Plant, Mellis Avenue, Kew** - updated allocation (SA 26), for residential and open space. Reflects extant permission. Renumbered as Site Allocation 32. Amend to reference nearby sewage works and need for odour impact assessment.
- **Site Allocation 32. Pools on the Park and surroundings, Old Deer Park, Richmond** - updated allocation (SA 22), for continued sporting uses, additional leisure/community/complementary uses provided meet identified needs and do not detract from main use, subject to heritage assessment. Links to Old Deer Park SPD. Renumbered as Site Allocation 33. No amends or updates considered necessary.
- **Site Allocation 33. Richmond Athletic Association Ground, Old Deer Park, Richmond** - updated allocation (SA 23), for continued sporting uses, additional leisure/complementary uses provided meet identified needs and do not detract from main use, subject to MOL and

historic designations. Links to Old Deer Park SPD. **Renumbered as Site Allocation 34. No amends or updates considered necessary.**

Place-based Strategy for Mortlake & East Sheen: create a new focus to Mortlake by redevelopment of the Stag Brewery site, creating a recreational and living quarter and link to the riverside. Focus on retaining the character of East Sheen, with potential to make Milestone Green the centre. **Amend to reference accessibility at Mortlake Station and improving the riverside environment, East Sheen Parkside amended from I5 to H5, inclusion of should (amended from will) relating to vibrant links between River and Town regarding development at Stage Brewery and.**

Site Allocations:

- **Site Allocation 34. Stag Brewery, Lower Richmond Road, Mortlake** – updated allocation (SA 24), for comprehensive redevelopment for a mix of uses to deliver a new heart for Mortlake, including a new 6-form entry secondary school plus sixth form, residential, employment, commercial – retail, other employment generating uses, health facilities, community and social infrastructure, river-related uses, sport and leisure uses, including retention/reprovision and upgrading of the playing field, with public realm and links to surrounding area and riverside. **Renumbered as Site Allocation 35. Amends to remove reference to Area of Mixed use – Mortlake, reference to if appropriate relocation of bus stop/turning facility from Avondale Road bus station and ownership of the towpath.**
- **Site Allocation 35. Mortlake and Barnes Delivery Office, Mortlake** - updated allocation (SA 25), for employment or other commercial and retail uses. **Renumbered as Site Allocation 36. Amends to remove reference to Area of Mixed Use – Mortlake, inclusion of reference to Article 4 restriction on the site, refer to housing as part of an employment-led scheme with retention of existing employment use and.**
- **Site Allocation 36. Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen** - updated allocation (SA 27), for employment and commercial uses as well as community and social infrastructure, mixed use with housing above and to the rear. **Renumbered as Site Allocation 37. No amends or updates considered necessary.**
- **Site Allocation 37. Barnes Hospital, East Sheen** - updated allocation (SA 28) , for social and community infrastructure uses, and provision of a new Special Education Needs school. Reflects extant outline permission. **Renumbered as Site Allocation 38. Amended to include reference to Environment Agency reviewing flood modelling on the site.**

Place-based Strategy for Barnes: focus on maintaining its character, with new development expected through incremental intensification. (There are no site allocations within this place.) **Amends to add reference regarding the council working in partnership with Barnes Common Ltd and London Wetland Centre on a range of flood projects, ways to reduce community isolation and deprivation, opportunities for improved wayfinding and opening up the riverside for sport and recreation with cross reference to the policy on tidal flood defences.**

Policies

- **Theme: Responding to the climate emergency and taking action**
Amends to text relating to Part L and inclusion of reference to Part F and Part O.
Policy 3. Tackling the climate emergency: new overarching climate change policy, bringing all the different climate change strands and strengthened requirements together as well as setting out the high level aims and expectations, including net-zero carbon by 2050 and what contribution developments need to make to achieve this. **Amends to reference ambition for a net-zero borough by 2043 at the latest, inclusion of lack of impacts from development on effects of climate change and flood storage along with flood risk. Updates to the glossary definitions, and amends and updates to the supporting text, including reference to the evidence base - the Net Zero Carbon study.**

Policy 4: Minimising Greenhouse gas emissions and promoting energy efficiency: updated approach (LP20 and LP22) to significantly strengthen the requirements for net-zero carbon, setting out how all developments resulting in 1 or more dwellings have to achieve net-zero, with specific on-site carbon emission reduction requirements. No more gas boilers in new dwellings or new non-domestic development from 2024. To set out a new carbon offset rate of £300/t (as opposed to current price of £95/t). Amends to reference ambition for a net-zero borough by 2043 at the latest, updates to the Building Regulations including on overheating and ventilation, and that the net zero minimum on site reduction should require 60% reduction for non-residential development with a maximum of 40% to be offset of 500sqm GIA or more (including new build, change of use and major refurbishments), inclusion to requirement to disclose space heating demand and over at least the 5 years of operation. Reduce the threshold requirement for on-site carbon emission reductions from 500sqm to 100sqm for non-residential development. Other amends and updates to the supporting text including on the conflict between the historic environment, introducing new sustainable technologies to buildings in conservation areas, and updates to Building Regulations including on overheating and ventilation.

Policy 5. Energy Infrastructure: updated and strengthened approach (LP22) in relation to requirements for decentralised energy and maximising opportunities for on-site electricity and heat production from renewable energy sources, with emphasis on non-combustible / non-fossil fuel energy for decentralised energy networks. Amends to clarify development of 500sqm or more of non-residential floorspace does include conversions, refurbishments, and major developments, and also amends to clarify in supporting text. Removal of reference in text to decarbonisation of the national grid, existing heat networks and adverse air quality impacts.

Policy 6. Sustainable construction standards: updated and strengthened approach (LP20 and LP22) in relation to requirements for BREEAM ratings from current 'excellent' to 'outstanding', together with requirement for BRE Home Quality Mark for new-build residential developments and specific fabric efficiency standards. Retaining existing approach to Sustainable Construction Checklist and maximum water consumption levels. Amends to clarify development of 500sqm or more of non-residential floorspace does include conversions, refurbishments, and major developments, minimum threshold for new non-residential building required to meet BREEAM Non-domestic New Construction standard increased from 100sqm to 500sqm, and to require developers to provide evidence from an accredited BREEAM assessor which demonstrates that 'Outstanding' is not technically feasible and in such a situation 'Excellent' would be acceptable. Reduce the threshold requirement with regards to fabric efficiency standards from 500sqm to 100sqm. Other amends and updates to the supporting text include update of BREEAM standards (2022), reference to shell and core and core only developments, reference to water efficiency standards. A summary table includes all the climate change and carbon requirements for different types of developments.

Policy 7. Waste and the circular economy: updated approach (LP24) in relation to waste and adopting principles of the circular economy, including new specific requirements for Circular Economy Statement and Whole Life-Cycle Carbon assessment. Amend to add reference to Construction Management Plans for river transportation of construction materials and waste reference also included in supporting text. Supporting text includes reference to different environmentally friendly methods of distributing surplus food waste, reference to Refuse and Recycling: Storage and Access Requirements SPD, application of policies in the WLWP (West London Waste Plan) will apply to the lifetime of the Local Plan and includes reference to Mayor's Whole Life-Cycle Carbon Assessment London Plan Guidance 2022.

Policy 8. Flood risk and sustainable drainage: retaining existing approaches (LP21) in relation to fluvial and tidal flood risk, with strengthened requirements for managing surface water flood risks and sustainable drainage as well as groundwater flood risks, including updated guidance and requirements for basement developments in flood affected areas. Incorporating recommendations from 2020 SFRA, including climate change allowances (use of 'upper end' scenarios) and approach to Sequential Test. Amends to technical requirements with reference to sequential approach on

specific sites, role of the LLFA (Lead Local Flood Authority) and the EA (Environment Agency), flood risk mitigation and resilience, sewer flooding, separate fluvial and surface water flood risks, flood storage, functional floodplain, set backs, basements, FRAPs, and a change from 'upper end' to 'central' climate change allowances. Inclusion of reference to Surface Water Management Plan and addition of text preventing any additional built development in the function flood plain or new active flood defences constructed as part of a new development. Inclusion of reference to raise flood defences to the 2065 statutory level, additional text preventing basements or basement extensions in the functional floodplain, and new basements must be independent from flood defences. Removal of reference to the Councils Strategic Flood Risk Assessment within policy. Along with amends and updates to the supporting text including additional text on Flood Risk and Coastal Change PPG, a new section on flood risk mitigation and resilience, 'Rewilding Arcadia' project, additional public space and habitat creation as a result of flood defence work, additional text on the encouragement of returning engineered riverbanks to a more natural state where possible and emphasises the importance of proper management of private flood defences. Additional clarification on distances of new development from rivers, and tidal areas as well as additional text of what is required if a development is unable to do this.

Policy 9. Water resources and infrastructure: largely retaining existing approaches (LP23) with updated importance on water quality. Amends to clarify on responsibilities around wastewater management, improvements to water quality, water supply, drainage, wastewater infrastructure for new development, reference adverse land use or environmental impact from new/expanded facilities should be minimised, and cross-reference Construction Management Plans and requirement of information to show adequate water supply. In supporting text addition of reference to flood risk activity permit, requirements of water companies to provide infrastructure, use of planning conditions to ensure adequate infrastructure and requirements on developers to make contact with water companies early in the process.

- **Theme: Delivering new homes and an affordable borough for all**

Policy 10. New Housing: updated approach (LP34) to reflect London Plan housing target, updated broad locations for future housing and sets out a stepped housing trajectory. Amends to clarify the net housing target is different to the unconstrained affordable housing need figures, add the latest trajectory and reflect the Housing AMR 2021/22 including in the housing numbers by broad area, and reference rolling forward beyond the ten year London Plan target.

Policy 11. Affordable Housing: updated approach (LP36) to reflect the London Plan and changes to national policy, including in regard to viability, and the Local Housing Needs Assessment. Sets out that First Homes and a fast track viability threshold approach are not appropriate in the borough context. Amends include application of an early, mid and late stage review for non-compliant schemes, approach to small site contributions from listed buildings, clarification that GLA funding will only apply to Social Rented, removal of reference to further research on First Homes, inclusion of paragraph on habitable rooms, seeking evidence of discussions with Registered Providers, and inclusion of key workers in intermediate housing, along with updates to the Whole Plan Viability Assessment and Local Housing Needs Assessment Update.

Policy 12. Housing Needs of Different Groups: updated approach (LP37) expanded to address specific types of housing for different groups, with emphasis on priority affordable housing needs, and to ensure local needs will be met through the design of proposals and securing details around eligibility and affordability, to accord with strategies for housing, commissioning, health and social care. Amends clarification on policy applying to all specialist housing, the net need for housing for older people and housing with care, and updates to the supporting text including reference to the Major of London's Practice Note on Wheelchair Accessible and Adaptable Student Accommodation (2022), current housing priorities, land constraints, update to Gypsy and Traveller evidence.

Policy 13. Housing Mix and Standards: updated approach (LP34) to accord with the London Plan including in terms of unit sizes and making efficient use of land. Amends include reference to

overheating, requirements for supported housing, a new paragraph on M4(2) standards and reference to updated Housing Design Standards London Plan Guidance 2022.

Policy 14. Loss of Housing: updated approach (LP38) to reflect the London Plan including in terms of optimising use of land and expecting replacement housing at existing or higher densities. Amends include consideration of impacts on existing housing, additional point in policy regarding positive impacts on the environment, transport, parking. Supporting text includes reference to amenity standards and housing land supply.

Policy 15. Infill and Backland Development: updated approach (LP39) to take account of types of brownfield sites where the London Plan expects optimisation for housing delivery, and a balanced approach to protecting garden land, resisting significant loss of garden land, with emphasis on assessing the harm of proposals. Amends to clarify assessment of any net loss in parking, updates to the supporting text and inclusion of references to relevant guidance.

Policy 16. Small Sites: new policy, to reflect London Plan emphasis and links with Urban Design Study. Amends including references to updated relevant guidance within the supporting text.

- **Theme: Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic**

Additional section added including definitions and themes associated with retail uses.

Policy 17. Supporting our centres and promoting culture: continues the existing hierarchy of the centre network (LP25), recognising the importance of smaller centres to Living Locally, and sets a positive approach to repurposing High Streets through adaptation and diversification including leisure and community uses. Acknowledges the significant impact of changes to the use classes. This overall strategic policy seeks to protect existing commercial space and promotes enhancement of the public realm for connecting places. Significant amends to the policy approach and moving away from repurposing retail floorspace, however key focus of diversifying town centres remains. Other amends include focus on new retail being located with primary shopping area and resisting loss of retail floorspace especially essential retail floorspace within this area. Added reference to updated Town Centre boundaries and inclusion of Local Centre boundaries reference. Within centre hierarchy, removal of references to previous boundaries, inclusion of Twickenham Green in neighbourhood centres and amendment of Local Shopping Parades to 'Important Local Parades'. Updated figures included on requirements for retail and commercial floorspace as per updated evidence and on vacancy rates. New section on vacant units relating to conversion and provision of new floorspace, removal of section emphasising repurposing of floorspace. Reference to designated shopping frontages is removed. Reference to updated Retail Research including a review of the hierarchy, all centre boundaries, and to reference the up to date Article 4 Direction (Class E to C3).

Policy 18. Development in centres: continues a town centre first approach (LP25, LP26) directing new major development to within the town centre boundaries, with a focus on the primary shopping area, and appropriate scale development in local centres and Areas of Mixed Use. Support for uses that add to vitality and viability, and that residential can be appropriate on upper floors and peripheries of centres. Links to the vision for each of the centres. Designates Cultural Quarters in Richmond and Twickenham, and recognises cultural clusters in other smaller centres. Seeks inclusive development, flexible provision, adequate servicing/delivery. Acknowledges the significant impact of changes to the use classes. Amends include removal of reference to designated frontages, community and learning, ground floor commercial uses and retention of 'shop' like frontages within policy. Additional points added to policy including reference to safe and inclusive environment, new approach to defined Primary Shopping Areas and resisting the loss of essential shops and services across the borough, reference to markets, and to provide clarity on the sequential test. Removal of section on Designated Frontages and removal of reference to Area of Mixed Use. Added reference to up to date Article 4 Direction (Class E to C3). Additional stipulations of when an impact assessment is required. Other amends and updates to the supporting text.

Policy 19. Managing the impacts of development on local surroundings: updates the previous approach (LP26) on over-concentration in light of the impact of changes to the use classes, with emphasis on supporting vibrant uses while managing the impacts, including the mitigation that may be sought. **Amends for clarity to the approach on over-concentration of uses, to clarify also applies to bars,** including removal of specified frontages/areas subject to specific restrictions of public houses, bars and hot food takeaways. **Other amends and updates to the supporting text, including to reference updates to national permitted development rights and the adoption of the Council's revised Statement of Licensing Policy and additional references to the Agent for Change principle.**

Policy 20. Local Shops and services serving essential needs: updates the previous approach (LP26 and LP27) supporting local shops and services, important for Living Locally, and resists the loss of public houses. Acknowledges the significant impact of changes to the use classes. **Amends to add definition of essential shops and services, to protect within centres and beyond where there is no alternative within walking distance (defined as 400m), and to clarify also applies to bars. Supporting text amended to include 'Essential Shops and Services', new sections added on importance of independent businesses serving the local community, the importance of being able to access services within walking/cycling distance, resistance to the loss of specific shop types and clarity on implementation.**

- **Theme: Increasing jobs and helping business to grow and bounce back following the pandemic**

Policy 21. Protecting the Local Economy: continued protection of existing employment floorspace (LP40, LP41, LP42) with a focus on the importance of existing designated employment sites across the borough and our town centres. Acknowledgement of impact of changes to the use classes, and reference to recent Article 4 Direction as this is the policy tool that will be applied. Expects employment-led intensification and all major new development to consider opportunity to include commercial use, given local employment needs and the uncertainty caused by the pandemic. As a strategic policy, mention of the importance of affordable, adaptable workspaces and the Agent of Change principle. **Amend to reference the voluntary and community sector and clarification on industrial land redevelopment.**

Policy 22. Promoting jobs and our local economy: new policy recognises the valued local economy and existing clusters/sectors, and promotes local employment opportunities, drawing out criteria for suitable spaces. Include support for technology, low carbon and the circular economy linking with climate change. **Amend to reference the voluntary and community sector, reference logistic hubs supporting last mile delivery and other amends in supporting text.**

Policy 23. Offices: strengthens existing approach (LP41) to expect no net loss of office floorspace, while continuing to direct new major office development to the town centres. Acknowledgement of impact of changes to the use classes, renaming Key Office Areas as Key Business Areas (as there is a link with the town and local centres policies above). **Removal of requirement for net additional floorspace, updates to the supporting text including office space floorspace and annual job requirements, removal of reference to London Plan policy E1. Inclusion of reference to the up to date Article 4 Direction (Class E to C3) and the updated evidence base, and refer to encouraging active travel.**

Policy 24. Industrial land: strengthens existing approach (LP 42) to expect no net loss, expecting industrial re-provision to provide suitable space. No longer allowing for mixed use of just residential and replacing industrial land with office floorspace as part of redevelopment proposals as this does not address the need. Acknowledgement of impact of changes to the use classes. **Amends include removal of Sandycombe Centre and updates to the supporting text including to reference the up to date Article 4 Direction (Class E to C3) updated evidence on industrial land stock in London.**

Policy 25. Affordable, flexible and managed workspace: expands on the existing approach (LP41) protecting existing affordable workspace and requiring on all sites providing more than 1,000sqm employment floorspace. Details modern, adaptable affordable workspace that is needed and how this will be secured. **No amends or updates identified as necessary.**

Policy 26. Visitor economy: updated approach (LP43) to reflect London Plan requirements for accessible hotel bedrooms and approach to cultural quarters and clusters in the borough. **Updates to the supporting text including reference to refresh of the Visit Richmond Strategy and updated hotel accommodation projections.**

Policy 27. Telecommunications and digital infrastructure: updated approach (LP33) recognising the need for enhancing digital infrastructure (reflecting London Plan requirements for new development) while also assessing the potential impacts. **No amends or updates identified as necessary.**

- **Theme: Protecting what is special and improving our areas (heritage and culture)**

Policy 28. Local character and design quality: takes forward existing approach (LP1) into broader strategic policy, linked to Urban Design Study and achieving design quality and various aspects to place-making. **Amends to clarify developments should maximise opportunities to enhance the local environment, and to supporting text to reference Secured by Design and energy efficiency in digital adverts.**

Policy 29. Designated heritage assets: minor updates to existing approach (LP3) including in response to climate change and latest on updating Conservation Area Appraisals. **Amends to policy clarifying circumstances of harming or loss of a listed building or building in a conservation area and added reference to improve protection for views and vistas. Removal of duplicate reference to Scheduled Ancient Monuments within policy. Amends to move reference on embodied carbon to supporting text.**

Policy 30. Non-designated heritage assets: minor updates to existing approach (LP4) including reference to locally listed historic parks and gardens. **Amend to reference the borough's historic industrial sites and water courses in the supporting text.**

Policy 31. Views and vistas: minor updates to existing approach (LP5) including links with Urban Design Study and forthcoming additional local views to be identified (for the Policies Map). **Amends to reference harm to quality of views and vistas/setting of a landmark, to reflect progress of the Local Views SPD and include the list of new views proposed for designation. Additional clarification on the provision of Accurate visual Representations. Additional paragraph providing context on the natural and historic environment in the borough and how non designated views are assessed. Other amends and updates to the supporting text.**

Policy 32. Royal Botanic Gardens, Kew World Heritage Site: minor updates to existing approach (LP6). **Removal of reference to outdated landscape masterplan in policy, but refer to current site management plan. Updates to the supporting text.**

Policy 33. Archaeology: minor updates to existing approach (LP7) to reflect forthcoming updated 'tiered' APAs. **Updates to the supporting text, to reference the updated APAs.**

- **Theme: Increasing biodiversity and the quality of our green and blue spaces, and greening the borough**

Policy 34. Green and Blue Infrastructure: updates the existing policy approach (LP12) to protect and enhance the multi-functional green infrastructure, as well as the blue infrastructure network, ensuring it is maintained and sets the strategic links with its role related to biodiversity, urban greening and climate change as well as outreach and education. **Amends to reference non-designated sites and measurable enhancements. Other amends to the supporting text including reference to clarify green corridors, and returning engineered riverbanks to a more natural state.**

Policy 35. Green Belt, Metropolitan Open Land and Local Green Space: continues the strong protection of the Borough's designated open spaces (LP13) and adds into policy the encouragement for improvements or enhancements to landscape quality (including visual amenity), biodiversity (including delivering biodiversity net gain) or accessibility. Policies Map changes suggested in light of evidence base (i.e. removal of one site from MOL, with two other minor changes to MOL boundaries; and 6 proposed new Local Green Space designations). **Amend to remove the reference**

to acceptable inappropriate development in policy text, inclusion of circumstances when improvement to MOL maybe acceptable. Other amends to the supporting text including reference to improving accessibility and cycle storage and additional Local Green Space designation.

Policy 36. Other Open Land of Townscape Importance (OOLTI): continues the protection of designated OOLTI (LP14) and while recognising the changes to PD rights, provides opportunity to encourage measures to restore spaces in terms of their quality, character and biodiversity net gain. Policies Map changes suggested in light of evidence base (i.e. adding one new site and removing duplication of OOLTI designation on one site). **Reference of updated evidence.**

Policy 37. Public open space, play, sport and recreation: updates existing approach (LP31) recognising importance of requirement to provide open spaces on-site as part of new development, and links to biodiversity and climate change, and to refer to the GLA's child yield calculator; updated policy to also refer to relocation of playing fields. Policies Map changes proposed in light of new Public Open Space deficiency mapping to be undertaken. **Amend to move the reference to ensure existing open space is protected from development from the supporting text into the policy. Update the Public Open Space deficiency mapping to reflect the updated Open Spaces Assessment. Update references to the emerging Playing Pitch and Outdoor Sports Strategy, and future Action Plan Updates. Additional references in supporting text to relevant updated evidence including documents that emphasise the importance of active environments. Clarification on catchment mapping and 400m buffer. Updates to the accessibility standard distances. Update to the Public Open Space boundary at Heathfield Recreation Ground to incorporate the eastern strip of land. Additional clarification on what is needed to assess new sports facilities provision. Additional details around Community Use Agreements and 3G pitches.**

Policy 38. Urban Greening: new policy to set approach to reflect London Plan Urban Greening Factor on major developments, incorporating the existing policy approach to green roofs and walls (LP17), and expecting incorporation of urban greening on all small sites, recognising wider links to biodiversity and climate change. **Additional emphasis on biodiversity within policy and updated evidence referenced in supporting text.**

Policy 39. Biodiversity and Geodiversity: continues protecting the borough's biodiversity (LP15), with updated mitigation hierarchies and increased emphasis on including the connection between habitats and importance of wildlife / ecological corridors, with a specific policy requirement for at least 20% contribution to delivering measurable biodiversity net gain. Policies Map changes suggested in light of evidence base, i.e. changing existing Other Site of Nature Importance (OSNI) to Site of Importance for Nature Conservation (SINC), amending and adding to existing sites as well as identifying new sites for protection. **Amends for clarity including the approach to blue and green infrastructure particularly the importance of ecological corridors, how back gardens will be protected from development to protect this cumulative key wildlife habitat resource, the importance of dark environments and opportunities to maintain this, and provision of swift bricks. Clarify the biodiversity mitigation hierarchy covering non-designated sites and the additional hierarchy to be applied to SINCs. Clarify requirements for information to be submitted with applications, with an emphasis on a measurable net gain for biodiversity including the relevant metric and good practice guidance and details confirmed following the Environment Act. Inclusion of reference to important geological sites.**

Policy 40. Rivers and river corridors: maintains the protection of the historic, environmental and natural qualities of the borough's water bodies (LP18). Promotes public access and protects river related industry and water dependent uses. **Amends to the policy to promote the link between protecting and enhancing river corridors for design reasons as well as biodiversity, flood risk benefit, improvements to public spaces, reference riverside access should be at all times, and reference to drowning prevention measures. Amends in the supporting text to reference set back requirements for rivers and creating buffer zones, barriers to fish movements, exploring opportunities to improve accessibility between different areas of the borough that are separated by the borough's rivers, and de-culverting rivers (in line with the Surface Water Management Plan).**

Policy 41. Moorings and floating structures: clarification (LP19) to improve and protect the open character, views and heritage of the waterways, and emphasise that new moored vessels would only be supported for river-related uses. **Amends to reference biodiversity of waterbodies and for clarity, along with other amends and updates to the supporting text.**

Policy 42. Trees, Woodland and Landscape: continues the protection of existing trees and requirements for new trees in development (LP16), with increased emphasis on the broader value of trees and links with biodiversity, air quality and climate change mitigation and adaptation. **Amends to reference historic parkland and for clarity. Amends and updates to the supporting text including reference to hedgerows, increasing tree canopy cover, where replacement trees are required and a future Tree Planting Strategy.**

Policy 43. Floodlighting and other external artificial lighting: continues policy approach (LP9) considering the demonstrable harm of floodlighting and the need to balance with positive benefits, including recognising potential for positive benefits around safety/security. **Amends to reference need to avoid unacceptable harm, along with amends and updates to the supporting text including justification with an application, dark corridors and up to date guidance.**

- **Theme: Improving design, delivering beautiful buildings and high-quality places**

Policy 44. Design process: new policy to reflect the Government and London Plan emphasis on design-led approach, setting out the tools to assess good design through the planning process including the role of design review. **Amends increasing emphasises on early engagement with the council, additional design information required upfront in the planning process and inclusion of higher fire safety standards within policy. Supporting text emphasises importance of early engagement with the local community and early consideration of fire safety.**

Policy 45. Tall and Mid-Rise Building Zones: updated policy approach (LP2) to respond to the London Plan requirements and links with the Urban Design Study identifying tall and mid-rise zones. **Amends for clarification to reference fire safety. The tall and mid-rise building zone at North Sheen (Lower Richmond Road) has been pulled back to sufficiently take account of the BTMs, as shown in Appendix 3.**

Policy 46. Amenity and living conditions: updated policy approach (LP8) particularly recognising London Plan approach to mitigating design features to ensure privacy. **Policy rewording to add reference to visual amenity, clarifying unacceptable impacts on neighbours dwellings as a whole, requirements for new residents including appropriate outlooks, privacy and outdoor amenity space. Additional reference in policy to London Plan policy D13 and Local Plan policy 53. Other amends and updates to the supporting text including updated evidence.**

- **Theme: Reducing the need to travel and improving the choices for more sustainable travel**

Policy 47. Sustainable travel choices: updates existing policy (LP44) to reflect the London Plan, Mayor's Transport Strategy and the Council's Active Travel Strategy. Increases emphasis on walking and cycling for short journeys, inclusive mobility and assessing the impact of developments on the road network - using a threshold approach linked to development size as to whether a separate Transport Statement or Transport Assessment is required for different types of uses. **Amends to reference cycle standards, vulnerable road users and accessibility, coaches, and for clarity in the supporting text including on safeguarding land and refuelling stations.**

Policy 48. Vehicular Parking, Cycle Parking, Servicing and Construction Logistics Management: updates existing policy (LP45) to reflect London Plan vehicle and cycle parking standards. Adopts a threshold approach linked to development size for whether future occupants will be excluded from a CPZ, for when an on-street vehicular parking stress survey is needed, and for when a construction management plan is required. Includes private vehicular crossovers to a former front garden, car-free development, and car clubs. **Amends for clarification around electric vehicle charging points, cycle parking, car clubs, delivery and servicing plans, construction management plans, and crossovers.**

- Theme: Securing new social and community infrastructure to support a growing population**

Policy 49. Social and Community Infrastructure: continues existing approach (LP29) to ensure adequate provision of community services and facilities, protecting existing sites and requiring new provision to be inclusive and adaptable, to accord with Living Locally. A new criterion allows for a change of use to wholly affordable housing without the need to explore and market for alternative social infrastructure use. Acknowledgement of impact of changes to the use classes. **Amend to cross reference HIA requirement. Reference to update of Council's Infrastructure Delivery Plan and reference to provision of new community infrastructure. Other amends and updates to the supporting text.**

Policy 50. Education and Training: updated approach (LP29) with additional detail regarding provision of childcare places, and to involve AfC in discussions. For promoting local employment opportunities, details updated to reflect adopted Planning Obligations SPD and circumstances when a financial contribution e.g. to Work Match may be accepted. Acknowledgement of impact of changes to the use classes. **Amends to the supporting text on implementation of Local Employment Agreements.**
- Theme: Creating safe, healthy and inclusive communities**

Policy 51. Health and Wellbeing: updated approach (LP30) to reflect health priorities and future infrastructure needs, such as space for social prescribing, emphasis on inclusive access, dementia-friendly environments, and public toilets and drinking water. Reflects the London Plan restrictive approach to takeaways. Links with related health plans and strategies, move to integrated care systems. Acknowledgement of impact of changes to the use classes. **Amends to reference access to healthy housing, importance of well-designed homes on health and other design measures to provide wider health benefits and address health inequalities. Additional section added relating to the new Community Safety Strategy supporting safer neighbourhoods and updates to reflect the Integrated Care System.**

Policy 52. Allotments and food growing spaces: continues existing approach (LP32), protecting existing allotments and supporting space for food growing. **Amends include reference to Boroughs Open Space Assessment and includes updated requirements on the number of allotment plots per resident.**

Policy 53. Local Environmental impacts: continues to seek to minimise adverse effects of development (LP10) and protect amenity of exiting occupiers. Now includes agent of change principles. **Amends to reference the agent of change applies to noise and other nuisances and consideration of risk to water quality, with reference to Construction Management Plans. Additional section on development needing to ensure the environment is respected and reference to Mayors Air Quality Neutral and Air Quality Positive LPG 2023. Inclusion of river corridors related to light pollution, and clarity on mitigation of groundwater from contamination and how this will be delivered.**

Policy 54. Basements and subterranean developments: update of existing approach (LP11), to reflect the policy approach to flood risk and sustainable drainage in terms of dealing with basements in flood affected areas assessing throughflow and groundwater and setting out where Basement Impact Assessments are required. **Amends to policy and supporting text adding a cross-reference to protect from sewer flooding if a proposal contains a waste outlet as covered by Policy 8.**
- Implementation, Delivery and Monitoring**

Policy 55. Delivery and Monitoring: new policy, to outline approach to delivery through partnership working, securing planning obligations, and enforcement and monitoring. **Section expanded to address implementation of the Plan, drawing out details in the supporting text and to reflect the update to the Council's Infrastructure Delivery Plan / Statement, updates on the monitoring of the Local Plan and other updates.**