

LONDON BOROUGH OF RICHMOND UPON THAMES

LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC

WRITTEN STATEMENT

MAIN MATTERS 4 - 12:

PLACE-BASED STRATEGIES (Overarching document)

WEDNESDAY 26 JUNE 2024

Main Matter 4 – Hampton and Hampton Hill (Site Allocations 1–5)
Main Matter 5 – Teddington and Hampton Wick (Site Allocations 6–9)

THURSDAY 27 JUNE 2024

Main Matter 6 – Twickenham, Strawberry Hill & St Margarets (Site Allocations 10–19)
Main Matter 7 – Whitton & Heathfield (Site Allocations 20 – 22)
Main Matter 8 – Ham, Petersham & Richmond Park (Site Allocations 23 – 24)

TUESDAY 2 JULY 2024

Main Matter 9 – Richmond & Richmond Hill (Site Allocations 25 – 30)
Main Matter 10 – Kew (Site Allocations 31 – 34)
Main Matter 11 – Mortlake & East Sheen (Site Allocations 35 – 38)
Main Matter 12 – Barnes

Abbreviations

AMR – Authority Monitoring Report

APA – Archaeological Priority Area

CIL – Community Infrastructure Levy

DtC – Duty to Cooperate

GLA – Greater London Authority

GLAAS – Greater London Archaeology Advisory Service

HWB – Health and Wellbeing Board

ICS – Integrated Care System

IDP – Infrastructure Delivery Plan

JSNA – Joint Strategic Needs Assessment

LBRuT – London Borough of Richmond upon Thames

LGS – Local Green Space

LP – The London Plan

LPG – London Planning Guidance

MM – Main Matter

MOL – Metropolitan Open Land

NHS – National Health Service

NPPF – National Planning Policy Framework

OOLTI – Other Open Land of Townscape Importance

PPG – Planning Practice Guidance

PSA – Primary Shopping Area

PTAL – Public Transport Accessibility Level

RLP – Richmond Local Plan

SA – Sustainability Appraisal

SINC – Site of Importance for Nature Conservation

SoCG – Statement of Common Ground

SPD – Supplementary Planning Document

SPG – Supplementary Planning Guidance

SPPS – School Place Planning Strategy

TfL – Transport for London

UDS – Urban Design Study

Question 4-12.1 Is the area strategy and are the site allocation policies justified by appropriate available evidence, having regard to national guidance and local context; and are they in 'general conformity' with the LP?

Introduction

The Area Strategies in the Local Plan have been developed using a consistent approach having had regard to national guidance, the London Plan and the local context. The following paragraphs explain this approach and how it has had regard to the national, regional and local context. This applies equally to all of the Area Strategies. Thus, rather than repeating the response below across Main Matters 4-12, for the sake of brevity the Council's response is set out once, in a separate Written Statement. Each of the Main Matter Statements in relation to each individual Area Strategy will only cover matters of relevance to that place.

The development of the Area Strategies and Site Allocations has been informed by a significant amount of evidence, including, but not limited to:

- Active Travel Strategy (2020) (SD-099)
- Air Quality Neutral LPG (February 2023) (SD-142)
- Air Quality Positive LPG (February 2023) (SD-141)
- Assessment of Borough Centres (2023) (SD-065)
 - Volume 1: Assessment of Town Centres (May 2023)
 - Volume 2: Assessment of Local Centres (May 2023)
 - Volume 3: Assessment of Neighbourhood Centres (May 2023)
 - Volume 4: Assessment of Local Parades (May 2023)
 - Assessment of Borough Centres 2023: Summary (May 2023)
- Background Topic Paper: Affordable Housing (November 2023)
- Background Topic Paper: Biodiversity Net Gain (January 2024) (SD-022)
- Background Topic Paper: Housing Delivery (October 2023) (SD-019)
- Background Topic Paper: Transport (January 2024) (SD-020)
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (SD-177)
- Characterisation and Growth Strategy LPG (June 2023) (SD-131)
- Climate Emergency Strategy 2019-2024 (January 2020) (SD-093)
- Climate Emergency Strategy 2023 Action Plan (2023) (SD-094)
- Connecting with London's Nature: The Mayor's Biodiversity Strategy (2002) (SD-129)
- Culture Richmond 2021 to 2031 (SD-100)

- Draft Local Views SPD (SD-125)
- Employment Floorspace Monitoring 2020-22 (December 2022) (SD-080)
- Employment Floorspace Monitoring 2022/23 (January 2024) (SD-081)
- Employment Land & Premises Needs Assessment (December 2021) (SD-057)
- Employment Land & Premises Needs Assessment Update (April 2023)
- Equality Impact and Needs Analysis (December 2021) (SD-037)
- Flood Risk and Development Sequential Test (April 2023) (SD-006)
- GLA London Industrial Land Supply Study 2020 (final version March 2023 includes updates to version published in January 2023) (Executive Summary) (and series of reports) (SD-074)
- Green Infrastructure Strategy – Colne and Crane Valleys (September 2019) (series of web-based documents) (SD-174)
- Habitats Regulation Assessment (December 2021) (SD-033)
- Health Impact Assessment (December 2021) (SD-038)
- Housing and Homelessness Strategy 2021-26 with executive summary and appendices (SD-095)
- Housing Trajectory and Summary Tables 2022/23 and Housing AMR 2022/23 (November 2023) (SD-079)
- ICOMOS Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022) (SD-153)
- Industrial Land and Uses LPG (consultation draft December 2023) (SD-138)
- Infrastructure Delivery Plan (detailed assessment) (April 2023) (SD-069)
- Infrastructure Delivery Plan (IDP) Addendum – update including Infrastructure Delivery Schedule (January 2024) (SD-070)
- Infrastructure Funding Statement for 2022/23 (December 2023)
- Joint Health and Wellbeing Strategy Prevention Framework 2021-2025 (SD-101)
- Local Housing Needs Assessment (SD-056)
 - 2021 Stage 1 Report and Appendix – Housing LIN Assessment of need for specialised housing and accommodation for older people in Richmond (December 2021)
 - 2023 Update Report (April 2023)
- Local Implementation Plan (June 2019) (SD-098)
- London Borough of Richmond Archaeological Priority Areas Appraisal (Historic England, March 2022) (SD-155)

- London Design Review Charter¹
- London View Management Framework SPG (March 2012) (SD-149)
- London’s World Heritage sites – Guidance on Settings SPG (March 2012) (SD-150)
- Mayor’s Transport Strategy (2018) (SD-128)
- National Design Code Model (Department for Levelling Up, Housing and Communities, 2021)²
- National Design Guide (Department for Levelling Up, Housing and Communities, 2021) (SD-156)
- Old Deer Park SPD (March 2018) (SD-122)
- Open Land Indicators 2016-2022 (August 2023)
- Open Land Review (Green Belt, Metropolitan Open Land (MOL), Local Green Space (LGS) and Other Open Land of Townscape Importance (OOLTI) (SD-054)
 - Green Belt, MOL, LGS and OOLTI Review (overarching report) (August 2021)
 - Green Belt Assessment Annex Report (detailed assessment (August 2021)
 - Metropolitan Open Land (MOL) Review Annex Report (detailed assessment) (August 2021)
 - Local Green Space (LGS) Assessment Annex Report (detailed assessment) (August 2021)
 - Errata Report (January 2023)
- Open Space Assessment (April 2023)
- Optimising Site Capacity: A Design-led Approach LPG (June 2023) (SD-132)
- Play and Informal Recreation SPG (September 2012) (SD-137)
- Playing Pitch & Outdoor Sport Assessment (July 2023) (SD-072)
- Playing Pitch & Outdoor Sport Strategy (September 2023) (SD-073)
- Research on Gypsies and Travellers (February 2023) (SD-068)
- Retail & Leisure Needs Study Phase 1 Update (July 2021) (SD-059)
- Retail & Leisure Needs Study Phase 2 Final Report (January 2023) (SD-060)
- Retail & Leisure Needs Study – Update Addendum (April 2024) (PSED-02)
- Review of Sites of Importance for Nature Conservation (2021 and 2022) (SD-064)
 - Review of Sites of Importance for Nature Conservation Volume 1 Report (November 2021)
 - Review of Sites of Importance for Nature Conservation Volume 2 Supporting Information (November 2021)

¹ www.london.gov.uk/programmes-strategies/shaping-local-places/advice-and-guidance/about-good-growth-design/london-design-review-charter

² www.gov.uk/government/publications/national-model-design-code

- Addendum to the Review of Sites of Importance for Nature Conservation (16 December 2021)
- Identifying Sites of Importance for Nature Conservation Volume 1 Report (November 2022)
- Identifying Sites of Importance for Nature Conservation Volume 2 Supporting Information (November 2022)
- Identifying Sites of Importance for Nature Conservation in Richmond Upon Thames 2023 update (September 2023)
- Richmond Biodiversity Action Plan (2019) (SD-175)
- Richmond Station Planning Brief (March 2002) (SD-123)
- School Place Planning Strategy (March 2023) (SD-102)
- Small Site Design Codes LPG (June 2023) (SD-133)
- Social Infrastructure Indicators 2016/17 - 2022/23 (January 2024) (SD-086)
- Stag Brewery Planning Brief SPD (2011) (SD-121)
- Strategic Flood Risk Assessment – Level 1 Update (July 2021) (SD-061)
- Sustainable Transport, Walking and Cycling (December 2022) (SD148)
- Thames Estuary 2100 (TE 2100) Plan (2023) (web-based collection (SD-169)
- Thames Landscape Strategy (Update 2012) (web-based document) and Action Plan 2023/24 (SD-171)
- Thames Landscape Strategy 'Rewilding Arcadia' (2022) (SD-170)
- The Royal Botanic Gardens, Kew World Heritage Site Management Plan 2020-2025 (SD-154)
- Urban Design Study (SD-052)
- Urban Green Factor LPG (February 2023) (SD-140)
- Vacancy rates in the borough's centres 2022 (Town Centre Land Use Survey) (July 2023) (SD-082)
- Village Planning Guidance SPDs (April 2023) (SD-119)
- Waste Sites Monitoring Report (April 2024) (SD-088)

NPPF

The NPPF requires strategic policies in a Local Plan to set out an overall strategy for the scale, pattern and design quality of places, to ensure outcomes support beauty and placemaking, as well as making sufficient provision for: housing, employment, retail, leisure and other commercial development; infrastructure; community facilities; and conservation and enhancement of the natural, built and historic environment (paragraph 20). The value of 'place' is further recognised in the important issue of housing provision. Whilst housing

numbers are important, Plans should 'set clear expectations for the quality of places to be created and how this can be maintained' (paragraph 74). In meeting the defined needs of 'place' – for housing in particular – best use should be made of existing and available land (paragraph 124), and its use should be optimised based on area-based character assessments (paragraph 129). Paragraph 124 sets out a series of expectations from planning policies, which includes encouraging multiple benefits from land (for example, mixed uses, securing environmental improvements through development proposals) and promoting the use of brownfield and under-utilised land.

London Plan

The London Plan 2021 aims to be consistent with national policy. It is underpinned by the idea of 'good growth' and sets out six key policies (GG1 – GG6) that focus on building strong and inclusive communities, making the best use of land, delivering the homes that London needs and growing the economy whilst maintaining resilience and efficiency to create successful mixed-use places. The strategic framework in chapter 2 sets the expectation for incremental change in outer London; paragraph 2.0.3 notes this is where the suburban pattern of development has significant potential for appropriate intensification over time, particularly for additional housing.

Area Strategies and Site Allocations

The Council's response to MM 1 and question 1.4.1 sets out the RLP approach to sustainable development which is consistent with the NPPF and London Plan, and the evidence base which has underpinned and informed Spatial Strategy approach. The Council's response to MM 2 and question 2.1 sets out how the Spatial Strategy is justified by appropriate available evidence, having regard to national guidance, local context and the London Plan. This strategy is articulated through the place-based strategies, where major and higher density development continues to be directed to the town centres or places that are well-connected to jobs, services, infrastructure and amenities via active travel modes, and where the 'Living Locally' approach is supported through the network of local centres, neighbourhood centres and parades spread across the Borough, with incremental intensification of existing communities, as envisaged by the London Plan.

As per the Council's response to MM 2 and question 2.1, the Open Land Review and UDS together form the basis for a holistic understanding of the Borough's constraints and capacity for growth. The emphasis is on promoting green infrastructure and mitigating the impacts of climate change, and protecting the Borough's environment, local character and heritage assets, whilst also meeting the needs of local communities and communities, as identified

via the borough-wide assessments to understand future needs for housing, employment, retail and leisure, which form part of the extensive evidence base, as already set out above. The RLP seeks to meet these future needs and make effective use of land, to ensure opportunities for development come forward by optimising the use of sites. This is borne out in the place-based strategies and site allocations, where the focus remains on steering major and higher density into the five town centres: Richmond, Twickenham, Teddington, Whitton and East Sheen. The UDS sets out an overall development strategy (as shown at Map 4.2 in the RLP) with the broad areas that form part of the strategy for tall building zones within town centres and/or on previously-developed sites, along with capacity in the Borough for mid-rise building zones. This is reflected in the place-based strategies, where sites designated as tall and mid-rise building zones are identified. Further, in line with the London Plan, incremental intensification is directed to existing residential areas within a high PTAL or close to stations or town centres.

The place-based strategies include key sites that are considered to assist with the delivery of the spatial strategy of the Plan as Site Allocations. Many Site Allocations are carried forward and updated from the existing adopted Local Plan (2018) or the Twickenham Area Action Plan (2013). A 'Call for Sites' was conducted alongside the 'Direction of Travel' consultation which informed the RLP including the place-based strategies and Site Allocations, with the addition of eight new sites that may come forward for development during the Plan period. In response to comments raised on the Regulation 18 Local Plan, there were three new Site Allocations added: Hampton Telephone Exchange, Homebase at Hampton, and Fulwell Bus Garage. Two Site Allocations were removed: Hampton Delivery Office and Twickenham Police Station. A Whole Plan Viability Assessment (2023) was undertaken to test the ability of proposed development in Richmond upon Thames to accommodate emerging policies in the Richmond Local Plan (Regulation 19) alongside prevailing rates of CIL in the Council's adopted Charging Schedule (subject to indexation). The Sustainability Appraisal for the Draft Local Plan (Regulation 19) (July 2023) appraises the Place-based Strategies and Site Allocations against a framework for the delivery of sustainable development. Site Allocations have been informed by the evidence base, including: Urban Design Study (2021 and 2023 update) Local Housing Needs Assessment (2021 and 2023 update) Employment Land & Premises Needs Assessment (2021 and 2023 update). The Borough's historic environment and its protected open spaces significantly limit the opportunities for development within the borough, and as a result there are limited suitable sites in the Borough.

The amount of development that has been identified within the RLP is set out by broad locations in Policy 10 Part B, however not for individual Site Allocations, which are not intended to be prescriptive by citing specific density or minimum/maximum housing

numbers, in order to allow for flexibility and in particular the London Plan approach to optimising site capacity, which needs to be determined via detailed site-specific discussions. However, the Site Allocations do set out a proposed vision for the site, including appropriate land uses which would be supported by the Council at planning stage, opportunities, restrictions, and expected timescales. The Site Allocations therefore allow flexibility for development proposals to be brought forward as well enabling the London Plan approach to optimise site capacity.

It is therefore considered that the Area Strategies and Site Allocations comply with the NPPF, with regards requirements for an overall strategy to deliver growth based on local needs, and are in conformity with the London Plan requirements for 'good growth' and optimisation of sites, based on a sound local evidence base.

Place-making

Chapter 12 of the NPPF seeks the creation of high-quality, beautiful and sustainable buildings and places. It states that Plans should set out a clear design vision for places, developed with local communities, to reflect local characteristics, and that these should be grounded in an understanding and evaluation of each area (paragraph 132).

The Area Strategy approach is therefore entirely consistent with the NPPF in that it clearly sets out a means of distributing the Borough's objectively assessed needs across the most appropriate locations, where services and transportation

Nationally, there has been a shift in focus in the importance of design in planning policy. As well as in the NPPF, this is reflected in the publication of the National Design Guide and National Model Design Code¹, which place significant importance on the need for a design-led approach when planning for good growth in a way that optimised capacity, delivers high-quality streetscapes, open space and development that contributes to the quality of life for communities.

Similarly, the London Plan focusses on a design-led approach, with greater consideration of character and design. In particular, Policy D1 sets the expectation for a design-led approach to determine the optimum development capacity of sites, and Policy D3 requires optimisation of site capacity through the design-led approach.

The Area Strategy in the RLP is entirely consistent with national and regional planning policy and guidance relating to design and place-making. The Council's response to Main Matter 2 question 2.1 sets out how the vision and strategic objectives of the RLP, as outlined in Policy

2, meet the requirements of the NPPF. In addition, to Policy 2, Chapter 5 sets out the place-making strategy of the Borough, to articulate how the Spatial Strategy will be delivered.

The place-based strategies are underpinned by the UDS (SD-052) commissioned by Arup. The UDS is based on a high-level townscape character assessment and an assessment of the Borough's capacity for growth, bringing together the values, character and sensitivity of different parts of the Borough with the reality of future development pressures. It also includes an identification of opportunities for tall and mid-rise buildings zones in the Borough. It is intended as evidence base to enable the Council to deliver a design-led approach to meeting its housing targets through the emerging Local Plan.

The methodology for undertaking the characterisation and capacity study is outlined in Appendix B of the UDS (SD-052). It included a review of national and regional policy, national design guidance, and regional planning guidance. A desk study of existing published information and data was then used to determine broad character areas for verification in the field and consultation. Key documents including the Village Plan SPDs, the Ham and Petersham Neighbourhood Plan, Conservation Area Statements and Appraisals and the Twickenham Area Action Plan. A full list of key documents is cited on page 387 and in Table 3 of the UDS. Field surveys were then undertaken with a focus on obtaining perceptual aspects of characteristics, verifying the desk study and contributing to valued features and negative qualities in each area. Site observations also captured features of local distinction and aspects of townscape quality and condition. This broad characterisation stage divided the Borough into the 9 high-level Places' which feature on Chapters 4-16 of the RLP. These are: Hampton & Hampton Hill; Teddington & Hampton Wick; Twickenham, Strawberry Hill & St Margarets; Whitton & Heathfield; Ham, Petersham & Richmond Park; Richmond & Richmond Hill; Kew; Mortlake & East Sheen; Barnes. Each of these places are also sub-divided into locally distinct 'character areas' (36 in total across the Borough). The purpose of defining 'character areas' within the places was to draw out the qualities important to local distinctiveness, drawing on a wide range of information, including building types, conservation areas, urban grain, open spaces, social date and historic mapping.

Public consultation was undertaken in 2021, during which the Council invited feedback on the Places and place names, character area boundaries and descriptions, valued features and future strategies for the character areas. The feedback fed into the UDS character study to refine character area boundaries, Places, valued features, negative qualities and design guidance. Also informing the place-based strategies are the discussions raised during the series of local Community Conservations during 2021 which followed the Richmond

Partnership Conference. Please see 'A summary of how a series of community conversations have informed the Draft Richmond Local Plan (December 2021) (SD-035)

The UDS (SD-052) presents each character area on an individual 'profile' which is reflected in the relevant place-based strategy in the RLP. Within each profile is a character strategy. This includes a description of the key characteristics of the character areas; an evaluation of character, including an explanation of the area's valued features and negative qualities; and an overview of the area's sensitivity to change. The UDS also looks at capacity for growth in the Borough (particularly in relation to tall buildings) using the character study as an evidence base. This considers sensitivity to change and probability of change (also known as 'likelihood' of change) together. The sensitivity and probability of change are then overlaid to understand the potential development capacity of character areas for growth.

The UDS (SD-052) will be used, in the implementation of the place-based strategies in the RLP. The RLP has dedicated a chapter to each Place (Chapters 6-14). Each chapter outlines the context and character for each place before setting out the vision for the area, and the place-making policy that defines the priorities and how they will be achieved. The relevant Site Allocations are then included at the end of each place-based strategy. These are the key sites that the Council has identified which are considered to assist with the delivery of the spatial strategy of the Plan. The format of each Site Allocation includes a 'Context' box where the key designations, constraints and characteristics of the site and surrounding area are set out. This greater level of detail relating to the existing context of each site was included as part of a reformatting of the Site Allocations at Pre-Publication Regulation 18 stage, to add clarity following comments including from Historic England wishing to see all heritage identified, and from amenity groups and residents wishing to see the details of site-specific constraints. The 'policy' for each site is then set out, including the land uses the Council would deem acceptable to support the overall spatial strategy of the Plan and the design-led approach required (including, where relevant, the necessary steps to protect and conserve heritage assets). Where Site Allocations have been designated tall or mid-rise building zones, as identified with the UDS, this is set out.

The place-based strategies are therefore considered to set out a clear design vision for places, developed with local communities, to reflect local characteristics, are grounded in an understanding and evaluation of each area, via a robust local evidence base which takes into account national regional planning policies and guidance relating to design and place-making. The Area Strategies are thus considered to be justified by appropriate available evidence, having regard to national guidance and local context; and are in 'general conformity' with the London Plan.

Representations

Comments on the Place-Based Strategies and Site Allocations were generally in relation to specific places or sites, or what is not included, with some comments on the nature of the site allocations and a few comments about the overall approach or structure of the Plan. Key comments specific to a particular place-based strategy or site allocation are addressed in the MMs related to the specific area-based strategy.

A representation was received from Historic England during the Local Plan (Publication) Regulation 19 consultation (Rep No. 80) which welcomes the greater level of detail in relation to the existing context of the site allocations, including the identification of relevant heritage assets, as well as references to other evidence and guidance such as the UDS (SD-052) and SPDs (SD-119). On the whole, Historic England consider these set out an appropriate framework to guide development proposals for the majority of site allocations. However, Historic England have raised concern that for a limited number of the allocations in the most sensitive of locations, they consider that some further work is required to ensure that heritage significance is properly reflected. In the allocation policies and therefore conserved and where possible enhanced. Historic England note the assessments, analysis and guidance that have been undertaken which underpins much of the Plan, including the UDS, and that where identified in the site allocation policies, it is considered relevant and helpful. However, Historic England have raised that for three of the allocations – Site Allocation 10 St Mary's University, Site Allocation 31 Kew Retail Park and Site Allocation 35 Stag Brewery – given their sensitivity and potential for impacts on the historic environment, Historic England consider that further amendments are necessary to ensure the allocation policies are clear on how development should manage these impacts. It is suggested that these could draw on assessments already undertaken, or may require further Heritage Impact Assessments. Historic England further commented that where taller or larger buildings are envisaged, 3D modelling will enable clarity as to impacts and help shape design parameters, including capacities, to avoid adverse impacts on heritage assets.

The Council notes Historic England's general support for the approach to the site allocations. With regards the other matters raised, it is noted that the reformatted allocations with the additional of a 'Context' box means that all relevant site designations and constraints, including on-site and nearby heritage assets, are cited. As in previous Plans, the format of the site allocations is intended to set out a high-level vision and broad framework, to allow for details such as capacity, to be assessed as part of pre-application and application stage, to allow for flexibility and in particular the London Plan approach to optimise site capacity. The UDS (SD-052) includes a borough-wide character assessment, but at site level, the

provision of a more detailed heritage impact and site capacity analysis would depend on whether such work had already been undertaken as part of a pre-application or full application submission. Where there are relevant heritage assets, there is reference already within the individual site allocations text to the requirement to protect, and where possible, enhance, relevant heritage assets, as well as to views and vistas. Any planning application for such sites would require the submission of a Heritage Statement. Further, RLP Policy 44. Design Process encourages applicants to engage with the Council's pre-application service early in the process, and it is also a policy requirement to provide 3D digital massing models to enable the Council to assess cumulative impact of development where relevant, and required for tall building proposals or those located within the protected views and vistas. It is therefore considered that in-detail assessment of impacts on heritage assets could be adequately considered at pre-application and application stage.

Historic England also suggested that where site allocations include an Archaeological Priority Area, the text should refer to the need to consult GLAAS early in the process, as well as noting that the correct terminology for the archaeological priority designations is APAs and not 'zones'. A modification to specifically reference early involvement of GLAAS in the supporting text at paragraph 20.56 for Policy 33. Archaeology (P32.1 in LBR-002) and a further modification to refer to APAs rather than Area Priority Zones (SA.1 in LBR-002) has been agreed with Historic England in the Statement of Common Ground (SOCG-11).

A modification (G1.1 in LBR-002) has been agreed with TfL in the Statement of Common Ground (SOC-03) to update the definition of PTAL in the glossary (Rep No. 79). Further details are set out in the Council's responses in Main Matter 19 in relation to the overall approach in the transport policies. The site allocations could otherwise set out in detail the specific bus and rail services located close to each site, however it is more likely that this will change over time.

Thames Water have commented during the (Publication) Regulation 19 Local Plan consultation on a large number of site allocations that further details are required by them to identify any infrastructure impact on the water supply, wastewater and/or surface water drainage requirements (Rep Nos. 83, 121, 123, 126, 127, 131, 178, 179, 180, 182, 190, 194, 198, 202, 205, 207, 210, 211, 214, 217, 223, 224, 228, 236, 237, 249, 253, 255, 257, 261, 268, 278, 281, 283, 285, 295, 300, 301, 302). The Council's response was to point out that site allocations set out a vision, but are not intended to be overly prescriptive, to allow for flexibility, and in particular the London Plan approach to optimising site capacity, which needs to be determined through detailed site-specific discussions. Thus matters relating to water and wastewater infrastructure would be considered at application stage. Where no

infrastructure requirements are identified, Thames Water set out advice for a developer to follow, which would be a matter for consideration at planning application stage, via an informative.

The London Borough of Hounslow note (Rep. No. 82) a number of site allocations close to the shared boundary and that no minimum development quanta or parameters. They request that if development comes forward there is engagement through Development Management to ensure cross-boundary impacts can be assessed and addressed. Please see the Council's response to question 4-12.1 above regarding the rationale for the level of detail within the site allocations in order to allow for flexibility and the London Plan approach of optimising site capacity, the details of which would be borne out of more detailed site-specific discussions at pre-application and planning application stage. Neighbouring boroughs are a statutory consultee on major planning applications that might have a material impact across borough boundaries, and as such can request mitigation as part of the planning application process where it would pass the NPPF tests to be acceptable. See also the Council's response to Main Matter 19.

There are a number of specific sites suggested for inclusion as site allocations (so-called omission sites). Please refer to the Council's response to MM2 question 2.1.

Question 4-12.2 Do the housing site allocations show how they will contribute to the achievement of the RLP's overall housing requirement over the plan period and the timescale for delivery?

As set out above in the Council's response to Question 4.12.2, the Site Allocations comprise key sites that are considered to assist with the delivery of the spatial strategy of the Plan. Policy 10 at part B sets out indicative ranges for the broad areas spread across the borough, to illustrate expected patterns of development, and considering all sources of housing supply of which the Site Allocations will form a component.

The Housing Delivery Background Topic Paper (SD-019) provides detail on the housing target for the whole plan period and sets out how this will be met within the borough. As set out in the Council's Response to Main Matter 3, the Council is able to provide sufficient housing sites to accommodate the Local Plan housing requirement with a sufficient buffer.

As referenced in SD-019, the Council's takes a cautious approach to the inclusion of deliverable sites within the five year housing land supply and the trajectory, to ensure confidence in a realistic prospect of delivery. Where sites are included in the latest published Housing AMR 2022/23 (SD-079), these are referenced in Main Matters 4-12.

The following Site Allocations could include an element of housing:

- Site Allocation 2 – Platts Eyot, Hampton
- Site Allocation 3 – Hampton Traffic Unit, 60-68 Station Road, Hampton
- Site Allocation 4 – Car Park for Sainsburys, Uxbridge Road, Hampton
- Site Allocation 5 – Hampton Telephone Exchange (Molesey Telephone Exchange)
- Site Allocation 6 – Telephone Exchange, Teddington
- Site Allocation 7 – Teddington Delivery Office, Teddington
- Site Allocation 8 – Strathmore Centre, Strathmore Road, Teddington,
- Site Allocation 9 – Teddington Police Station, Park Road, Teddington
- Site Allocation 10 – St Mary's University, Strawberry Hill
- Site Allocation 11 – Richmond upon Thames College, Twickenham
- Site Allocation 12 – The Stoop (Harlequins Rugby Football Club), Twickenham
- Site Allocation 13 – Twickenham Stadium, Twickenham
- Site Allocation 14 – Mereway Day Centre, Mereway Road, Twickenham
- Site Allocation 15 – Station Yard, Twickenham
- Site Allocation 16 – Twickenham Telephone Exchange
- Site Allocation 17 – Twickenham Riverside and Water Lane/King Street
- Site Allocation 18 – Homebase, Twickenham Road, Hanworth
- Site Allocation 19 – Fulwell Bus Garage, Wellington Road, Twickenham
- Site Allocation 20 – Telephone Exchange, Ashdale Close, Whitton
- Site Allocation 22 – Whitton Community Centre, Percy Road, Whitton
- Site Allocation 23 – Ham Close, Ham
- Site Allocation 24 – Cassel Hospital, Ham Common, Ham
- Site Allocation 25 – Richmond Station, Richmond
- Site Allocation 27 – Richmond Telephone Exchange, Spring Terrace, Richmond
- Site Allocation 29 – Homebase Manor Road, North Sheen
- Site Allocation 30 – Sainsburys, Lower Richmond Road, Richmond

- Site Allocation 31 – Kew Retail Park, Bessant Drive, Kew
- Site Allocation 32 – Kew Biothane Plant, Melliss Avenue, Kew
- Site Allocation 35 – Stag Brewery, Lower Richmond Road, Mortlake
- Site Allocation 36 – Mortlake and Barnes Delivery Office, Mortlake
- Site Allocation 37 – Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen
- Site Allocation 38 – Barnes Hospital, East Sheen

The Council's overall pipeline of delivery from site allocations based on information within the 2022/23 AMR is included within the Housing Delivery Background Topic Paper (SD-019) which defines 270 dwellings are anticipated to be delivered within the 10 year period from allocated sites. Although this is a small proportion of the London Plan 10 year housing requirement of 4,110, the Council has a sufficient pipeline of deliverable sites from other sources, totalling 3,026 dwellings as defined within the Housing Delivery Background Topic Paper (SD-019), which will be updated when the 2023/24 AMR is published, which is anticipated to be in Summer 2024.

Further details for each Site Allocation are set out in the area-specific sections in the Council's response to Main Matters 4-12 including details of any forecast of the number of units and potential timescales for housing delivery.

Question 4-12.3 Is it clear how the expectations for employment, commercial, retail, social and community infrastructure will contribute to an evidenced need?

Yes, it is clear how evidenced need will be met in the borough, in total and in relation to each of the Place-based Strategies. Please refer to the Council's response to Main Matter 2, in particular Question 2.1 and Question 4-12.1 above in relation to the robust and extensive evidence base relating to the RLP as a whole. Key elements of the evidence base are also set out in the RLP itself in paragraph 2.17 and in more detail in paras 4.19-4.23.

The purpose of much of this evidence is to establish need for main town uses, particularly for housing, employment, retail and leisure floorspace and for social infrastructure including school place planning, access to green and blue infrastructure and indeed all aspects of need. The policies in the Plan and Site Allocations proposed will meet this identified need.

The following paragraphs will provide an overview of how need will be met, with the exception of housing need which is dealt with the Council's response to Question 4-12.2 above.

Meeting need for retail and leisure floorspace

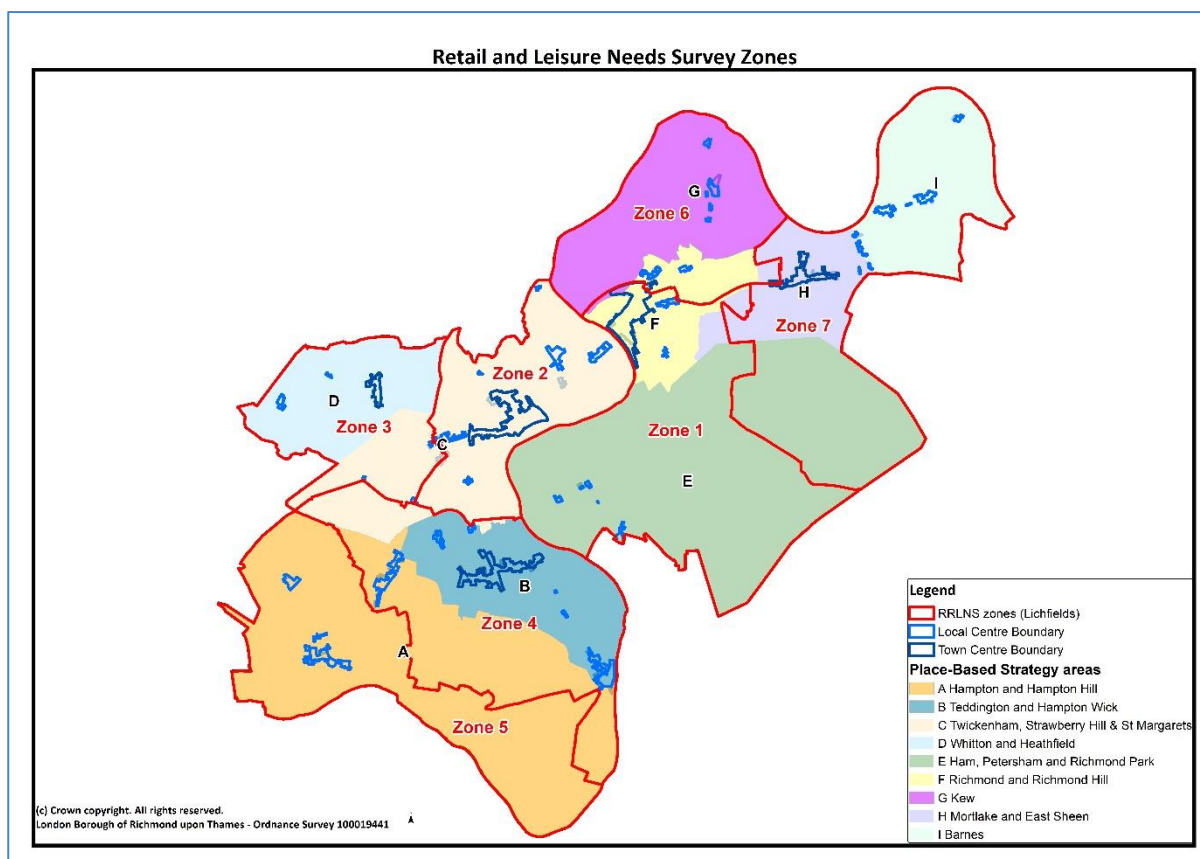
The Council’s response to Main Matter 14 – Shaping and Supporting Town Centres – describes the evidence base for borough centres and the response to Question 14.1 especially sets out the assessment of need in detail. A thorough quantitative and qualitative assessment of need for retail, food and beverage and commercial leisure floorspace has been carried both at a global and local level. See in particular the Retail and Leisure Needs Study (RLNS) (Phase 1 - SD-059 and Phase 2 - SD-050) undertaken in three parts and the Assessment of Borough Centres 2023 (SD-065). The Update Addendum (PSED-02) which takes account of the latest Experian economic forecasts was published in February 2024. Projected need for floorspace for each zone is set out in Table 2 of the Council’s response to Main Matter 14 and summarised below:

Table x – Summary of retail and food/beverage floorspace capacity (sq m gross)

	Convenience retail	Comparison retail	Food/beverage	Total
2029	-1435	-803	2628	390
2034	-1940	-1122	5491	2429
2039	-1831	-1042	9094	6221

Source: RLNS Update Addendum (PSED-02)

Whilst these are the global figures for the borough as a whole, the RLNS included forecasts for the seven zones (based on ward boundaries) within the Study area thus providing geographical disaggregation and a more local perspective. It is noted that the Study zones do not fully correspond with the Place-Based strategy areas as indicated on the map below.



Overall conclusions of the RLNS and Update Addendum recommend a flexible approach which can respond to opportunities and consider reoccupation of vacant space. The revised capacity projections suggest that there is no pressing requirement to allocate sites for major retail development in order to accommodate projected growth over the plan period. The most appropriate strategy is to facilitate the reoccupation of vacant shop units potentially for non-retail uses including food/beverage outlets, leisure, entertainment and cultural uses. Based on a reasonable reduction in vacancy rates, vacant floorspace could theoretically accommodate most of the need for new town centre uses up to 2039. The priority is to direct main town centre uses into the borough’s centres in line with centre-first policy.

Paragraph 86 (d) of the September 2023 NPPF / 90 (d) of the December 2023 NPPF looks to planning policies to set out a range of suitable sites in town centres to meet the scale and type of development anticipated to be required over the following decade, and to review town centre boundaries if sufficient sites are not available where site availability is identified as an issue. As referred to above, the evidence suggests that the fulfilment of any required growth should be directed towards centres, vacant units and existing opportunities that exist.

However, the Plan recognises the need for flexibility and encourages local development opportunities for both retail and other main town centre uses in individual centres where they are able to maintain and enhance the overall health of a centre, including through the redevelopment, refurbishment or the appropriate expansion of sites. Paragraph 18.10 explicitly recognises that not all development can be accommodated in re-purposed space. The Plan includes a number of Site Allocations which contain town centres uses, including retail, as part of their development/ redevelopment. Policy 17 refers to the Place-based strategies in the Plan and lists the Site Allocations in town centres (paragraph 18.18). Guided by the place-based strategies the Plan seeks to unlock the potential of and embrace the individuality of each centre.

The following Site Allocations could include an element of retail:

- Site Allocation 1 - Hampton Square – partial redevelopment
- Site Allocation 5 - Hampton Telephone Exchange (Molesey Telephone Exchange)
- Site Allocation 6 - Telephone Exchange, Teddington
- Site Allocation 7 - Teddington Delivery Office, Teddington - appropriate land uses could include retail on the ground floor
- Site Allocation 13 - Twickenham Stadium – associated retail only
- Site Allocation 16 - Twickenham Telephone Exchange
- Site Allocation 17 - Twickenham Riverside and Water Lane/King Street – retail to be maintained on the ground floor
- Site Allocation 18 - Homebase, Twickenham Road
- Site Allocation 19 – Fulwell Bus Garage
- Site Allocation 25 - Richmond Station
- Site Allocation 26 - Former House of Fraser, Richmond
- Site Allocation 29 - Homebase, Manor Road, Richmond – residential-led schemes which may include an element of retail
- Site Allocation 30 - Sainsbury's Lower Richmond Road, Richmond – comprehensive redevelopment including re-provision of existing foodstore.
- Site Allocation 31 - Kew Retail Park
- Site Allocation 35 - Stag Brewery – comprehensive redevelopment including retail and other employment generating uses
- Site Allocation 36 - Mortlake and Barnes Delivery Office, Mortlake – appropriate uses could include retail

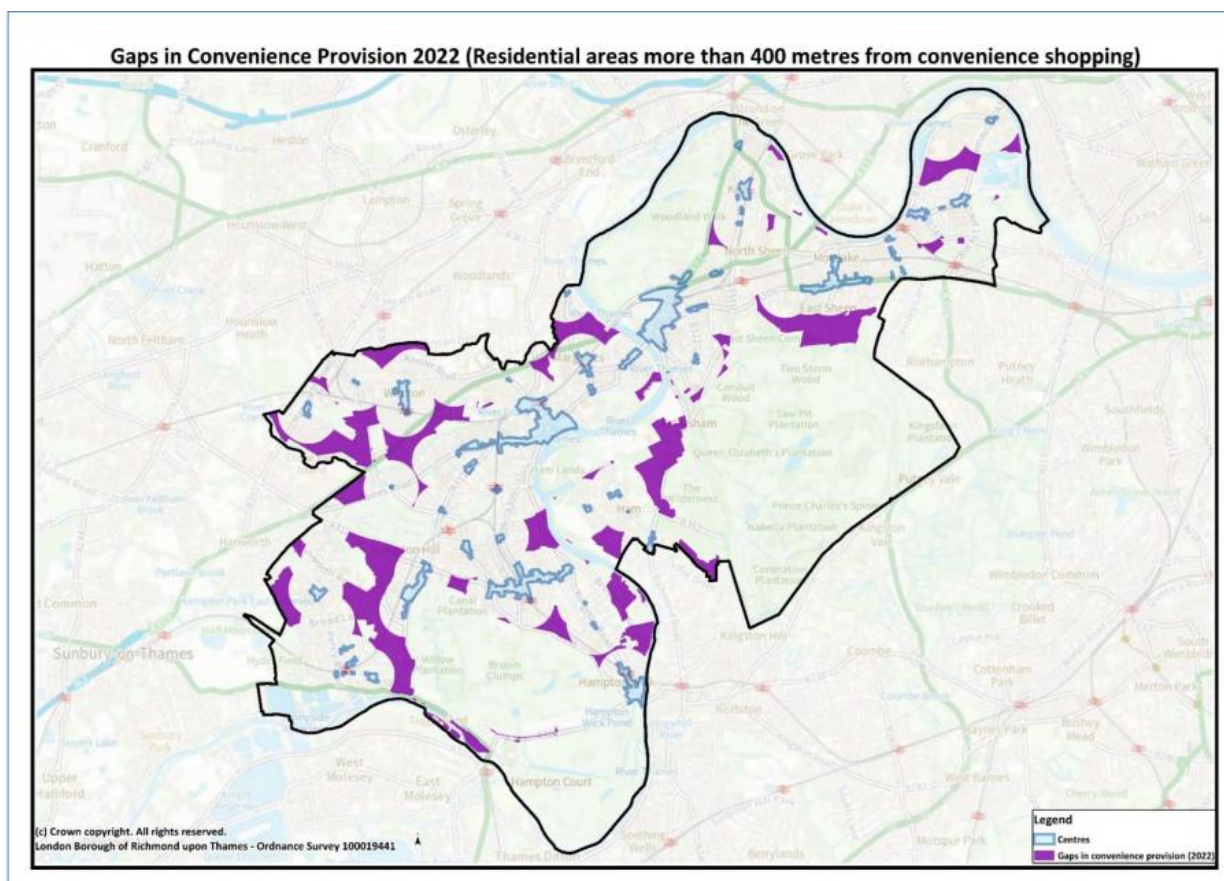
Primary Shopping Areas (PSAs) have been defined in the five town centres only, after careful consideration (See Assessment of Borough Centres SD-065), taking into account the

distribution of land uses in particular by categorising and mapping of retail uses, the location of vacancies and the Plan's place-based strategies for centres. PSAs have been tightly drawn. Within PSAs loss of retail floorspace is to be resisted, and new retail development encouraged. It is acknowledged that Site Allocations which specify retail can also be appropriate locations for retail, providing that any requirements of that Site Allocation including scale of retail are met as well as compliance with other policies in this Plan.

Paragraph 18.12 of the RLP explains in detail why PSAs are needed, despite the forecast oversupply of retail floorspace. In short, the borough's town centres have a comparison shopping role which is an important component of their overall offer, function and attractiveness, assisting in meeting the needs of the community and important to retaining a centre's market share and overall vitality. Comparison shopping benefits from a compact retail core which fosters browsing.

The Assessment of Borough Centres (SD-065) and the RLNS Phase 2 (SD-050) also carried out detailed work analysing the provision of local facilities and the role of centres in meeting need. The former mapped convenience provision across the borough and beyond the borough boundary where relevant then analysing the role of centres in providing for essential needs (see Map below).

The report took into account whether a centre was providing for communities which are not well-served by public transport, serving the needs of those living in areas considered deprived/disadvantaged and whether it served areas which were more than 400 metres from convenience provision. It also considered the location of larger housing commitments and whether the centres in question would have a role to play in serving new residents. GIS mapping allowed for the consideration of the cumulative effect of these variables.



Source: SSA GIS mapping
(SD-065) Volume 1, pg 8.

The RLNS Phase 2 Report (SD-060) also included an assessment of the need for other town centre uses including commercial leisure (see Section 5). The report's conclusions can be found in paragraphs 5.47 to 5.50. It is suggested that "*future expenditure growth could support new commercial leisure and cultural floorspace in LBRuT of:*

- *about 5,000 sq.m by 2034; or*
- *about 7,500 sq.m by 2039."* (para 5.48 of SD-060)

Meeting need for employment floorspace

The Council's response to Main Matter 15 – Increasing jobs and helping business to grow and bounce back following the pandemic – outlines the evidence base findings for the borough. It is set out under question 15.1 the identified shortfalls in office and industrial floorspace, and the difficulties faced in delivering additional employment floorspace in this borough. See in particular the Employment Land and Premises Needs Assessment (December 2021) (SD-057) and Employment Land and Premises Needs Assessment Update (April 2023) (SD-058). The Employment Land and Premises Needs Assessment

Update (April 2023) (SD-058) forecasts that there will be a net requirement of 23,000 sqm of office floorspace and 60,000 sqm of industrial floorspace for the forecast period 2019-39.

Meeting the need for employment floorspace is expected to be focused on the borough's town centres and designated Key Business Areas (KBA) and Locally Important Industrial Land and Business Parks (LIILBP). There is also provision for employment uses in a number of the Site Allocations. As is set out under the Council's response to question 15.4, the borough lacks sites for the development of significant new employment space, and is challenged in its ability to deliver intensification of existing employment sites due to the nature of those sites and their location in predominantly residential areas constraining further development. The borough has continued to experience loss of commercial floorspace through permitted development (Class E to residential) and there is continuing pressure on the borough's employment sites for residential/mixed-use development. The RLP seeks to protect all existing office and industrial employment space in the borough.

The Key Business Areas (KBA) and Locally Important Industrial Land and Business Parks (LIILBP) are those parts of the borough that are considered to be of particular importance for provision of employment space. The KBAs are the Key Office Areas that have been carried forward from the adopted Local Plan (recognising that a wider range of commercial uses may be accommodated under Class E). LIILBPs are recognised for their importance locally in providing job opportunities and meeting local business needs for industrial space and have been designated in accordance with the requirements of London Plan policy E6 (Locally Significant Industrial Sites). The borough's modified Article 4 Direction (Class E to residential) (SD-074) that came into force on 31st July 2022 covers much of the area designated as KBA and LIILPBs. It is recognised that the capacity of these locations is insufficient to meet future growth needs and as such the RLP sets out provisions to protect all existing office and industrial space, recognising that in a borough like Richmond this is often small-scale and interspersed with surrounding residential uses, but meeting an important need locally.

The RLP includes a number of Site Allocations which contain employment uses as part of their development/redevelopment potential, often recognising that in a borough like Richmond this may be small-scale and sit alongside other town centre uses such as retail and community uses.

The following Site Allocations include an element of employment:

- Site Allocation 2 – Platts Eyot, Hampton
- Site Allocation 3 – Hampton Traffic Unit, 60-68 Station Road, Hampton

- Site Allocation 5 – Hampton Telephone Exchange (Molesey Telephone Exchange, 34 High Street, Hampton TW12 2SJ)
- Site Allocation 6 – Telephone Exchange, Teddington
- Site Allocation 7 – Teddington Delivery Office, Teddington
- Site Allocation 16 – Twickenham Telephone Exchange
- Site Allocation 17 – Twickenham Riverside and Water Lane/King Street
- Site Allocation 18 – Homebase, Twickenham Road, Hanworth
- Site Allocation 20 – Telephone Exchange, Ashdale Close, Whitton
- Site Allocation 21 – Kneller Hall, Whitton
- Site Allocation 25 – Richmond Station, Richmond
- Site Allocation 26 – Former House of Fraser, Richmond
- Site Allocation 29 – Homebase, Manor Road, North Sheen
- Site Allocation 31 – Kew Retail Park, Bessant Drive, Kew
- Site Allocation 35 – Stag Brewery, Lower Richmond Road, Mortlake
- Site Allocation 36 – Mortlake and Barnes Delivery Office, Mortlake
- Site Allocation 37 – Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen

The employment policies in the RLP are aligned with the requirement of paragraph 82 of the September 2023 NPPF/paragraph 86 of the December 2023 NPPF, which states that planning policies should “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth” and to “set criteria, or identify strategic sites, for local and inward investment to match the strategy and meet anticipated needs over the plan period”. Furthermore, the London Plan in policy GG5 (Growing a good economy) requires local planning authorities in London to plan for sufficient employment and industrial space in the right locations to support economic development and regeneration, and includes specific guidance under policies E1 (Offices), E2 (Providing suitable business space), E3 (Affordable workspace), E4 (Land for industry, logistics and services to support London’s economic function), E6 (Locally significant industrial sites) and E7 (Industrial intensification, co-location and substitution).

Meeting social and community infrastructure needs

The Council considers that it is clear how the expectations for social and community infrastructure in relation to each of the Place-based Strategies and Site Allocations will contribute to an evidenced need. Section 24 of the Richmond Local Plan (RLP) (SD-001) sets out policies to ensure the adequate provision of a range of social and community infrastructure uses, especially in areas where there is an identified need or shortage. The Council's response to Main Matter 20 - Securing new social and community infrastructure to support a growing population (Policies 49 and 50) - sets out how the requirements for social and community infrastructure are justified by appropriate available evidence, why the Council considers the requirements for social and community infrastructure uses to be deliverable, and how the social and community infrastructure policies give clear direction as to how a decision maker should react to a development proposal.

Paragraph 24.2 of the RLP (SD-001) sets out how social infrastructure includes an array of services and facilities, providing a non-exhaustive list of examples of social and community infrastructure uses. Therefore, given how social and community infrastructure encompasses a wide range of both statutory and non-statutory services, the Place-based Strategies consist of a number of Site Allocations spatially distributed across the borough which include social and community infrastructure uses as part of their development/redevelopment potential:

- Site Allocation 1 – Hampton Square, Hampton
- Site Allocation 3 – Hampton Traffic Unit, 60-68 Station Road, Hampton
- Site Allocation 5 – Hampton Telephone Exchange (Molesey Telephone Exchange, 34 High Street, Hampton TW12 2SJ)
- Site Allocation 8 – Strathmore Centre, Strathmore Road, Teddington, TW11 8UH
- Site Allocation 9 – Teddington Police Station, Park Road, Teddington
- Site Allocation 10 – St Mary's University, Strawberry Hill
- Site Allocation 11 – Richmond upon Thames College, Twickenham
- Site Allocation 12 – The Stoop (Harlequins Rugby Football Club), Twickenham
- Site Allocation 13 – Twickenham Stadium, Twickenham
- Site Allocation 14 – Mereway Day Centre, Mereway Road, Twickenham
- Site Allocation 17 – Twickenham Riverside and Water Lane/King Street
- Site Allocation 18 – Homebase, Twickenham Road, Hanworth
- Site Allocation 19 – Fulwell Bus Garage, Wellington Road, Twickenham
- Site Allocation 20 – Telephone Exchange, Ashdale Close, Whitton
- Site Allocation 21 – Kneller Hall, Whitton

- Site Allocation 22 – Whitton Community Centre, Percy Road, Whitton
- Site Allocation 23 – Ham Close, Ham
- Site Allocation 24 – Cassel Hospital, Ham Common, Ham
- Site Allocation 25 – Richmond Station, Richmond
- Site Allocation 26 – Former House of Fraser, Richmond
- Site Allocation 28 – American University, Queens Road, Richmond
- Site Allocation 29 – Homebase, Manor Road, North Sheen
- Site Allocation 33 – Pools on the Park and surroundings, Old Deer Park, Richmond
- Site Allocation 34 – Richmond Athletic Association Ground, Old Deer Park, Richmond
- Site Allocation 35 – Stag Brewery, Lower Richmond Road, Mortlake
- Site Allocation 37 – Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen
- Site Allocation 38 – Barnes Hospital, East Sheen

While some of the above sites may currently be progressing through the planning process or under construction, others represent longer-term opportunities for the provision of social and community infrastructure where the RLP seeks to influence development should they come forward through planning.

Need for new social and community infrastructure is identified on an evidential basis from the Council and its partners strategies and plans, as outlined in paragraph 24.7 of the RLP. In particular, the Infrastructure Delivery Plan (IDP) (SD-069) and IDP Addendum (SD-070) have been produced in consultation with the Council's partners and service providers to provide a snapshot in time of the infrastructure need and the identified future delivery within the borough. Section 3.1 of the Council's IDP (SD-069) assesses future need for different types of social infrastructure and where possible, infrastructure costs and potential funding sources. Additionally, pages 8 to 11 of the IDP Addendum (SD-070) set out a schedule of relevant social and community infrastructure projects of various types across different areas of the borough, including projects to support new or continued use of education uses, community centres, libraries, and sports facilities and more. The IDP therefore ensures that all infrastructure matters necessary for the achievement of the Local Plan Vision and Spatial Strategy as well as the place-based strategies, policies and site-specific proposals are embraced.

In regard to health provision, the Richmond Health and Wellbeing Board (HWB) is a collaborative partnership between Richmond Council, local GPs, the NHS which includes NHS South West London Integrated Care Board (responsible for commissioning and overseeing health services), and the voluntary and community sectors. The RLP has been informed by the needs identified in the Joint Strategic Needs Assessment (JSNA)³ which was undertaken by the HWB to identify the current and future health and care needs. The RLP has also been informed by the Council's Prevention Framework 2021 to 2025 (SD-101) which aims to embed prevention in the Council's wider work, particularly through the environment, to promote positive health and wellbeing and to address health inequalities. The RLP and evidence of need has also been informed by the Richmond Health and Care Estates Strategy, published in 2021⁴, which aims to support new models of care and integrated working, developing flexible spaces and optimising use of the estate. The NHS South West London Integrated Care System (ICS) are also developing an estates strategy.

The RLP recognises that open spaces, play spaces and sport and recreation facilities are important components of social infrastructure. The Council has produced assessments of need for open space (including play space) (SD-067), sports and recreation facilities, including opportunities for new provision (SD-072), as well as a borough-wide Playing Pitch Strategy (SD-073). Indoor sports facilities are specifically covered by Policy 49 'Social and Community Infrastructure (Strategic Policy)'. An update to the Council's Indoor Sports Facility Needs Assessment is due in 2024, with the Council due to consider a new Richmond Leisure, Sport and Physical Activity Strategy (see further details in the Council's response to Main Matter 17 and question 17.1).

The RLP has been informed by the Council's Culture Richmond 2021 to 2031 (SD-100) which sets out how our arts, library, parks, sport, and fitness services will enrich the lives of those who live in, work in, and visit the borough. The RLP compliments the strategy's aim that by 2031 the borough has an innovative, diverse, and accessible cultural offer which contributes to the growth and success of our borough, communities, and people. Many cultural venues and facilities are identified in the place-based strategies in the RLP.

³ The JSNA is available at www.richmond.gov.uk/services/public_health/public_health_publications/jsna

⁴ The Richmond Health and Care Estates Strategy is available at www.cabnet.richmond.gov.uk/documents/s90348/Richmond%20CCG%20Estates%20Strategy%20V2.7.pdf

With regards to educational uses, the RLP has been informed by the Childcare Sufficiency Assessment⁵, as well as the Council's School Place Planning Strategy (SPPS) (SD-102) which sets out the strategic framework for the provision and management of school places within the borough. In particular, the SPPS focusses on the growing need for additional school places where they are needed: in the mainstream secondary school sector, particularly in the eastern half of the borough; and in the specialist school places sector. Accordingly, the RLP identifies land for new educational use at Stag Brewery (Site Allocation 35) and Barnes Hospital (Site Allocation 38), which form part of the Place-based Strategy for Mortlake & East Sheen.

The social and community infrastructure policies in the RLP are aligned with the requirement of paragraph 20 of the September / December 2023 NPPF which states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for community facilities (such as health, education and cultural infrastructure). The RLP also aligns with paragraph 93 of the September 2023 / paragraph 97 of the December 2023 NPPF which states that planning policies should plan positively for the provision and use of shared spaces, community facilities and other local services, take into account and support the delivery of local strategies to improve health, social and cultural well-being, and guard against the unnecessary loss of valued facilities and services. The approach also accords with the London Plan which recognises that additional and enhanced social infrastructure provision is required to meet the needs of London's growing and diverse population.

⁵ The Richmond Childcare Sufficiency Assessment is available on the AfC website: <https://kr.afcinfo.org.uk/pages/community-information/information-and-advice/family-information-service-and-childcare-search/childcare-sufficiency-assessment-csa>

Question 4-12.4 Is wording of the policies clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

The Council's response to Main Matter 1 sets out the general context for the Plan as a whole, providing clear direction for a decision-maker. The Council considers that the place-based strategy policies are in accordance with Paragraph 16 of the NPPF, which requires that policies are 'clearly written and unambiguous' and drafted in such a manner that it is 'evident how a decision maker should react to development proposals'. Policies are positively worded, unless local evidence suggests an alternative approach, and – where appropriate – set out the requirements for decision-makers using a criteria-based approach.

The place-based strategies each comprise of 6 sections: Area Profile, Overall Strategy; Other Initiatives; Vision; Policy; section on Site Allocations within the area.

The Area Profile sets out the Character Areas as defined within the UDS (SD-052) and provides a summary of the defining positive characteristics of the 'Place', including negative aspects and opportunities for improvement, and what local people cited as valued features as part of the UDS consultation.

The Overall Strategy provides a high-level summary of each Character Area's sensitivity to, and capacity for, change, as defined within the UDS assessment. It also references that the UDS contains design guidance for each Character Area,

The Other Initiatives is a short section which references specific organisations active in the area which may be relevant to stakeholders to the deliver of strategic projects in the area, as well as any projects currently under consideration.

The Vision section sets out the high-level vision and objectives for the area, such as general land uses to support local needs, and local distinctiveness of urban grain/open spaces etc which require protection, for example.

The above sections (Area Profile, Overall Strategy, Other Initiatives and Vision) are intended as a helpful starting point for a decision-maker when assessing an application, with regards to setting out what the unique high-level characteristics and aspirations for an area are, as underpinned by the UDS. They are not intended to be overly detailed, and are to be read in conjunction with the UDS.

With regards the Policy section in the place-based strategies, this comprises a list of bullet points of policy aspirations for the area, wo which future development in the area is expected to contribute. The text was amended during the plan-making process to state 'where

relevant', in recognition that not all policy requirements will be relevant to all planning applications, as this will depend on type, scale, location etc. Rather, the policies are to be read in conjunction with the Local Plan as a whole. The thresholds for the application of policies throughout the Plan, together with Local Validation List requirements, would still apply to any development, with the purpose of the Policies in the place-based strategies being the provision of more granular detail and local context for how the Local Plan policies relevant to a particular planning application could be delivered. They are also intended to be helpful in instances where the 'planning balance' might apply to the assessment of a scheme, or where an application is required to deliver public benefits in order to outweigh heritage harm in order to be acceptable, as per paragraph 208 of the NPPF.

With regards the site allocations, these are intended to set out what would be deemed an acceptable land use(s) and other preferred aspirations for a site. Again, these policy asks would be read in conjunction with the Local Plan as a whole. That a development proposal does not meet every policy ask for a site allocation, would not preclude a planning application from being granted approval by a decision-maker, as any assessment would be made against all relevant planning policies in the Plan and a 'planning judgement' applied. Instead, the site allocation policies are intended to act as a 'guide' as to what the Council would deem acceptable for a site, and to provide local context. Site allocations have also been reformatted in order to better separate details of the context of the site and surrounding areas, and the policy asks for the site, for the sake of clarity.

The draft Local Plan has been shared with LBRuT colleagues in Development Management at Regulation 18 and 19 stages. No concerns with the place-based strategy and site allocation policies have been raised.

The Publication (Regulation 19) Consultation Version Local Plan (SD-001) has been submitted to the Secretary of State for examination. However, the Council has reviewed the representations received and has set out detailed comments within the 'Schedule of Responses to the Publication Local Plan (Regulation 19) consultation (in plan order) with the Council's response' (SD-014). The responses identify, where considered appropriate, a small number of specific changes to the wording of the place-based strategies and site allocations for the sake of clarity. The suggested amendments are set out within the 'Summary of main issues raised during the Publication Local Plan (Regulation 19) consultation and Summary of the Council's response on main issues (January 2024) including summary of each response' (SD-013). Key amendments for each place are set out in the area-specific sections in MMs 4-12.