

The 2014 checklist provided by the Planning Advisory Service has been used as a template for the soundness self-assessment for the Richmond Local Plan. A separate checklist looks at legal compliance.

In summary – the key requirements of plan preparation are:

- Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?
- Is the plan justified?
- Is it based on robust and credible evidence?
- Is it the most appropriate strategy when considered against the alternatives?
- Is the document effective?
- Is it deliverable?
- Is it flexible?
- Will it be able to be monitored?
- Is it consistent with national policy?

The Tests of Soundness at Examination

The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria.

The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182): “The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is ‘sound’ “, namely that it is:

1. Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF, together with the Marine Policy Statement (MPS) set out principles through which the Government expects sustainable development can be achieved.

2. Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

This means that the DPD should be based on a robust and credible evidence base involving:

- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

This means the DPD should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

4. Consistent with national policy: enabling the delivery of sustainable development

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy www.planningportal.gov.uk). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared. Please don't assume that you have got to provide all of these, they are just suggestions of what could be relevant.

In addition, the Legal Compliance checklist (a separate document, see www.pas.gov.uk) should be completed to ensure that this aspect is covered.

The Duty to Co-operate will also be assessed as part of the examination process.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<i>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. 	<p>Richmond Council’s Cabinet at its meeting on 2 July 2015 agreed that a review of the existing policies contained within the Core Strategy (2009) and Development Management Plan (2011) should be undertaken, particularly in light of the Government changes that have occurred since their adoption, most notably the publication of the NPPF. It was also agreed to take the site-specific allocations forward alongside the review of the policies, rather than developing a stand-alone Site Allocations DPD.</p> <p>The Council carried out an initial / early consultation on the scope and rationale for review of planning policies contained within the Core Strategy (2009) and Development Management Plan (2011), together with the emerging site allocations. The issues that the Council sought to address in the Local Plan review are set out in the early consultation that took place from 4 January until 1 February 2016. This consultation was accompanied by a ‘Detailed review of existing policies’, which set out detailed analysis and assessment of the policies against national and regional guidance, local evidence and need, together with the rationale and scope for the review of the policies. In addition, the Council reviewed the Sustainability Appraisal (SA) Scoping Report (incorporating Strategic Environmental Assessment requirements), and consultation on the draft report took place alongside the scope of the review. In particular, the SA sets out the relevant baseline information and data in relation to the social, environmental and economic issues of the area, and the report identified the key sustainability issues for the borough, which led to the development of the SA framework and objectives to test the performance of the Plan against.</p> <p>The second consultation on the Local Plan (Regulation 18), which took place from 8 July until 19 August 2016, set out ‘Why we are reviewing this policy area’ and ‘What the evidence says’, and these sections clearly identified the issues that the Council considered needed to be addressed.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The Local Plan’s strategic vision describes what the borough will be like in 2033. It is set out in section 2.2 of the Local Plan, which has 3 inter-related themes of ‘Protecting Local Character’, ‘A Sustainable Future’ and ‘Meeting People’s Needs’. These three themes provide the basis for the Strategic Vision and they are the golden thread that runs through the Local Plan.</p> <p>Section 2.3 of the Local Plan sets out the strategic objectives for the Local Plan, and they outline what will need to be achieved to deliver the Local Plan's strategic vision. The objectives also set out how the key sustainability issues facing the borough, as identified in the Sustainability Appraisal and its Scoping Report, are addressed.</p> <p>Section 3 of the Local Plan sets out the spatial strategy, which builds on information from the borough’s evidence base, including feedback from public consultations. It also sets out how the main elements of the strategic vision and strategic objectives for the borough are to be delivered over the plan period from 2018 to 2033.</p> <p>The Local Plan’s policies follow logically from the objectives and spatial strategy, and they follow the structure of the 3 inter-related themes of ‘Protecting Local Character’, ‘A Sustainable Future’ and ‘Meeting People’s Needs’. The Council considers that there are no policy gaps and each objective can be linked to a relevant policy in the plan. In addition to the Local Plan, it also has to be considered that the London Plan is part of the development plan for the borough.</p> <p>Reasonable alternatives have been considered as part of the Sustainability Appraisal (SA) process. SA is an iterative part of the plan making process. SA was carried out simultaneously alongside the preparation of the Plan and informed the consideration of alternatives and options, as well as making decisions on the final policy direction.</p>

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		<p>The Local Plan has gone through various internal Council approvals. All policies have been agreed corporately and the Council considers that there are no internal inconsistencies.</p> <p>The timescales set out in the Local Plan are considered realistic. The Plan covers the period from 2018 until 2033. Evidence has been produced to support the various objectives and policies of the Local Plan, for example, the Strategic Housing Market Assessment (2016) considered the housing needs of the area for a 10-year period; the Plan is supported by monitoring information as well as a future land supply setting out when and where growth will take place; and the updated Employment Land Study (2016 and 2017) considers forecasts in economic growth and growth in jobs.</p> <p>Section 13 of the Plan sets out the implementation and delivery of the Plan. In essence, the Local Plan will be implemented and delivered through a combination of private sector investment, the work of other agencies and bodies and the Council's own strategies and initiatives.</p> <p>The majority of new development identified in the Plan's site allocations, particularly investments in new infrastructure, housing and jobs, will be delivered by the private sector. The Council has also updated and published an updated Infrastructure Delivery Plan (IDP) (2017), which incorporates an Infrastructure Delivery Schedule, and together it sets out the range of plans, programmes and strategies, including those of partner organisations and agencies.</p> <p>The IDP was prepared in collaboration and partnership working with the infrastructure and service providers. It sets out responsibilities for the delivery of each scheme/infrastructure, funding arrangements where known and likely timescales of delivery.</p> <p>In addition, infrastructure providers, key agencies and other key</p>

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		<p>stakeholders have been consulted throughout the preparation of the Local Plan, and the Consultation Statements set out how their comments have been taken into account; see the Statement of Consultation Part I (January 2017), and the Statement of Consultation Part II (May 2017).</p> <p>Ongoing monitoring of the Local Plan, for example through the Authority’s Monitoring Report, and regular reviews of the IDP, will highlight if changes to the timescales are required. The Local Plan is supported by a Monitoring Framework.</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <p>—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</p> <p>—specific policies in this Framework indicate development should be restricted.</p>	<ul style="list-style-type: none"> • An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see ‘Section 3 Effective’, below). • An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. • Evidence of responding to opportunities for achieving sustainable development in different areas (for example, the marine area) 	<p>The Council has produced a robust and detailed evidence base that supports the Local Plan and its spatial strategy. The evidence base has informed the establishment of development needs of the plan area and has been used to develop the spatial strategy in terms of quantum and distribution of development in the borough.</p> <p>All evidence underpinning the Local Plan is listed in the supporting documents; also see the list of supporting and background documents submitted to the Planning Inspectorate.</p> <p>The Local Plan is underpinned by a Strategic Housing Market Assessment (2016) for Richmond borough, and relevant housing targets for the area are derived from the London Plan. Needs assessments have also been carried out in relation to other types of developments and uses, such as in relation to employment, retail, open spaces and playing fields/sports pitches. Where objectively assessed needs are not being met, it is clearly indicated in the evidence base and/or Local Plan as to why this is the case, i.e. where specific policies in the NPPF indicate that development should be restricted or where adverse impacts of meeting needs would significantly and demonstrably outweigh the benefits when assessed against the NPPF’s policies as a whole.</p> <p>The spatial strategy of the Plan seeks to steer major development into the</p>

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		<p>five main centres of the borough. Focusing development in the main centres will result in sustainability benefits, including a reduction in the need to travel by car and also mitigate the effects of the increasing development pressure on the rest of the borough. Policy LP 25 of the Local Plan sets out how the vision and approach for each main centre. In addition, as the Council has been developing Village Planning Guidance SPDs for village areas across the borough, these SPDs also provide guidance to support the overall vision for the relevant village area, which assists in shaping the direction of development and growth in each village area of the borough.</p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<ul style="list-style-type: none"> A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk) 	<p>A key element of the Local Plan review has been to consider existing policies of the Core Strategy (2009) and Development Management Plan (2011) in the light of Government changes, such as the NPPF. Therefore, the Local Plan has been developed in accordance with the NPPF and as such the policies follow the approach of the presumption in favour for sustainable development. The Plan also defines the local dimensions of sustainable development and shows how this presumption in favour of sustainable development is expressed locally.</p> <p>The Council does not consider that a policy that explicitly sets out the presumption in favour of sustainable development is required as this would be largely repeating national policy.</p>
<p><i>Objectively assessed needs</i> The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see</p>	<ul style="list-style-type: none"> Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate. 	<p>The Local Plan seeks to make effective use of land; specifically, the spatial strategy and the policies of the Local Plan identify opportunities for development to come forward by optimising the use of sites, particularly in centres with good public transport accessibility and mixed use redevelopments.</p> <p>The Local Plan has been informed by and is based on objectively assessed economic, social and environmental needs of the borough; this includes:</p> <ul style="list-style-type: none"> Strategic Housing Market Assessment (2016) (2016) Employment Land Study (2016 and 2017) Retail Study (2014)

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above).		<ul style="list-style-type: none"> • Open Space Needs Assessment (2015) • Indoor Sports Facilities Needs Assessment (2015) • Playing Pitch Strategy (2015) • Playing Pitch Assessment (2015) • Parking Standards Research (2016) • Infrastructure Delivery Plan (IDP) (2017) • Joint Strategic Needs Assessment <p>Policy approaches, such as those for Housing, Employment, Retail and the Borough’s Centres as well as those on Open Space, Playing Fields and Health & Wellbeing have been derived from these studies.</p> <p>In addition, the Local Plan is supported by a Policy Background Paper (2017), which analysed in detail each Core Strategy (2009) and Development Management Plan (2011) policies, and which included in particular local evidence and need as well as a justification for the continued and/or revised policy approach in the Local Plan.</p>
NPPF Principles: Delivering sustainable development		
1. Building a strong, competitive economy (paras 18-22)		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	<ul style="list-style-type: none"> • Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate. 	<p>A clear economic vision is set out in section 2.2 of the Local Plan, which states that “The borough’s local economy will be successful. Jobs will be readily available and there will be a choice of employment opportunities as the borough’s Key Office Areas as well as the industrial land and business parks will have been protected from encroaching residential development. Employment space will have supported new business start-ups and enabled businesses to grow. There will continue to be a high proportion and variety of small local businesses, offering local jobs, and further opportunities for residents to set up their own enterprise.”</p> <p>Paragraphs 3.1.32 to 3.1.34 set out the spatial strategy for strengthening local employment and supporting businesses.</p>

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<p>Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)</p>	<ul style="list-style-type: none"> • A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. • An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22) 	<p>Policies LP 40, LP 41, LP 42 and LP 43 collectively are expected to deliver the vision and objectives to support the growing population by providing for jobs as well as land and premises for the borough’s businesses.</p> <p>The overall aim of the Local Plan is to make efficient use of brownfield land, without building on greenfield sites and the protection of the environment is a key objective of the Plan.</p> <p>The employment projections and job growth forecasts suggest a very strong demand for employment space and therefore the Plan seeks to protect and maintain the borough’s employment base to accommodate the growth. The Local Plan sets out strengthened policies in relation to employment and introduces a new designation for 'Key Office Areas' (see Local Plan policy LP 41). However, whilst the policy seeks a net increase in office floorspace within the Key Office Areas, there is scope for mixed use floorspace and higher density development in such areas. In areas outside of the Key Office Areas, the policy requires a sequential approach to be applied prior to considering non-employment uses and this includes a marketing exercise of a minimum of two years to take account of economic and development cycles.</p> <p>In addition, the borough has a very limited supply of industrial floorspace and demand for this type of land is high. The London Plan states that a ‘restrictive’ approach towards the transfer of industrial land to other uses should be adopted in this borough, which means that industrial land should not be released for other uses. Therefore, Local Plan policy LP 42 identifies the existing locally important industrial land and business parks, which are of particular importance in this borough, and within those areas any loss of industrial space will be strongly resisted. However, there is scope within the policy to intensify the uses within these sites and new industrial floorspace or expansion of existing is encouraged; other non-industrial uses would also be considered provided they do not affect or impact on the continued</p>

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		<p>operation of existing industrial services. Therefore, the policies are considered to be in line with paragraph 22 of the NPPF.</p> <p>The Local Plan therefore emphasises the safeguarding of existing employment premises and land, and the majority of the site allocations seek a mix of uses, including employment and/or employment generating uses, which will assist in accommodating growth in employment floorspace and jobs.</p> <p>The Local Plan, as required by the NPPF, is underpinned by extensive evidence base on employment, including:</p> <ul style="list-style-type: none"> • Employment Land Study (2016 and 2017) • Borough-wide assessment of Office Stock (2015) • Assessment of Light Industrial and Storage Stock (2016) and Appendices <p>In addition, a Whole Plan Viability (2016) study supports the Local Plan and considers the cumulative assessment of all of the emerging plan policies, proposals and requirements.</p>
<p>2. Ensuring the vitality of town centres (paras 23-37)</p>		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<ul style="list-style-type: none"> • The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to 	<p>Maintaining and enhancing the vitality of the borough’s centres, including the main centres as well as local and neighbourhood centres and parades, is a key aspect of the Local Plan’s spatial strategy and objectives.</p> <p>Policies LP 25, LP 26 and LP 27 collectively are expected to deliver the vision and objectives to support the borough’s centre and to ensure they are competitive and positively managed.</p> <p>The borough’s five main centres comprising the principal centre of Richmond and the four district centres of Twickenham, Teddington, East Sheen and Whitton make up the first tier of the borough’s centre hierarchy. They have an important role to play, providing shops, services, employment opportunities, housing and being a focus for community and cultural life.</p>

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	town centres.	<p>Policy LP 25 sets out the borough’s centre hierarchy and refers to the borough’s Main Centre Boundaries as shown on the Local Plan Proposals Map.</p> <p>Major commercial developments, including retail proposals, are expected to come forward in the main centres, such as Richmond station in central Richmond; Twickenham is also suitable for major commercial development. Smaller centres, such as local and neighbourhood centres as well as parades of local importance provide a good range of food and comparison shops, independent and specialist shops – these are very valued as they provide goods and services to meet local needs.</p> <p>The borough’s centres are suitable for higher density development and the Local Plan (policy LP 25) states that residential development contributes to the overall health of centres and assists in meeting the Borough’s housing target. There is scope to increase housing stock in the centres, such as through increased densities or introducing housing in upper floors. However, the Plan also seeks to protect commercial and community uses, and therefore housing in the borough’s centres should not lead to an unacceptable loss of such uses, for example commercial/community uses on ground floors should remain of a viable size if housing is introduced in upper floors or to the rear of the ground floor.</p>
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)	<ul style="list-style-type: none"> • An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. • Primary and secondary shopping frontages identified and allocated. 	<p>The Council's Retail Study (December 2014) estimates that an increase in retail floorspace of 21,700sqm gross will be needed by 2024, comprising of about 4,000sqm gross of convenience goods floorspace, 11,500sqm gross of comparison goods floorspace and 6,500sqm gross of Class A3/A4/A5 floorspace. Some of this need could be met by the re-occupation of existing vacant units in some centres. Site allocations in the Local Plan are sufficient to meet the remainder of the forecast increase in floorspace.</p> <p>Policy LP 26, Appendix 4 and the Local Plan Proposals Map set out the</p>

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		<p>designated Key (equivalent to Primary) and Secondary Shopping frontages. Policy LP 26 reinforces the spatial strategy’s approach to development in centres and parades, and it defines their function in the borough’s centre hierarchy, taking into account the need to provide for retail floorspace as evidenced by the Retail Study (as set out in Policy LP 25).</p> <p>A1 retail uses are best located in Key Shopping frontages, which are the core shopping areas, where retail predominates, and LP 26 seeks to protect existing A1 uses. They are crucial for delivering the borough’s required retail provision. The Secondary Shopping Frontages complement the Key Shopping Frontages and play an important supporting role to the centres. It is recognised that a range of uses are necessary to produce, healthy, attractive and unique centres, and in Secondary Shopping Frontages an appropriate level of diversification is encouraged. Within the Secondary Shopping Frontages, whilst Policy LP 26 prevents the reduction in the retail function, it also recognises the existing diversity and that there are established non-retail uses, and therefore the policy allows for some diversification and other non-retail uses provided certain criteria are met.</p> <p>Designated shopping frontages have been reviewed and are regularly monitored through comprehensive town centre health checks. Key indicators such as vacancy rates are monitored annually to ensure that the amount of designation is appropriate. See the Council’s website for further information and evidence.</p> <p>Local Plan policies require major new office development to be within the borough’s main centres. Smaller-scale office development is encouraged in suitable locations such as the town centres. Key Office Areas have been identified and designated because of their importance for office employment and encouragement given, in these areas in particular, for development of new office space.</p>

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		Policy LP 34 of the Plan sets out indicative ranges for residential development in broad areas of the borough, based on the spatial strategy and encourages higher density development in more sustainable locations including the borough’s main centres, where it contributes to vitality particularly on upper floors and to the rear.
<p>3. Supporting a prosperous rural economy (para 28)</p>		
<p>Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)</p>	<ul style="list-style-type: none"> Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities. 	Not applicable
<p>4. Promoting sustainable transport (paras 29-41)</p>		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas</p>	<ul style="list-style-type: none"> Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. A spatial strategy and policy which seeks to reduce the need to travel 	<p>The strategic vision and spatial strategy seek to accommodate the majority of higher density and larger scale developments within the borough’s centres, thus enabling people to walk to shops and services or use public transport. Ongoing engagement and duty to co-operate activities have been carried out throughout the preparation of the Local Plan, in line with paragraph 31 of the NPPF.</p> <p>Policy LP 44 promotes safe, sustainable and accessible transport solutions, which minimise the impacts of development including in relation to congestion, air pollution and carbon dioxide emissions, and maximise opportunities for health benefits and providing access to services, facilities and employment. Therefore, it encourages development that facilitates the use of sustainable modes of transport in line with paragraph 35 of the NPPF.</p>

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<p>emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential</p>	<p>through balancing housing and employment provision.</p> <ul style="list-style-type: none"> • Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. • If local (car parking) standards have been prepared, are they justified and necessary? (39) • Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan. 	<p>The Plan and policies ensure that new development is designed to maximise permeability within and to the immediate vicinity of the development site through the provision of safe and convenient walking and cycling routes, and to provide opportunities for walking and cycling, including through the provision of links and enhancements to existing networks.</p> <p>Health and wellbeing (see policy LP 30) is a theme that runs throughout the Local Plan and the Plan recognises that planning, at all levels, plays a crucial role in creating environments that enhance people's health and wellbeing. Policy LP 30 states that development that results in a pattern of land uses and facilities that encourage sustainable modes of travel such as safe cycling routes, attractive walking routes and easy access to public transport to reduce car dependency will be supported. In addition, the policy on sustainable transport (LP 44) also promotes and supports healthy and active lifestyles.</p> <p>In relation to public transport, the Council will ensure that major new developments maximise opportunities to provide safe and convenient access to public transport services. Proposals will be expected to support improvements to existing services and infrastructure where no capacity currently exists or is planned to be provided. The policy also encourages the use of the River Thames for passenger and freight transport. Land required for proposed transport schemes as identified in the London Plan and the Council's Local Implementation Plan for Transport will be safeguarded.</p> <p>Policy LP 45 relates to the Council's parking standards. The Council will require new development to make provision for the accommodation of vehicles in order to provide for the needs of the development while minimising the impact of car based travel including on the operation of the road network and local environment, and ensuring making the best use of land. The parking standards take account of the high levels of car ownership</p>

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<p>developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		<p>in the borough as well as the fairly densely developed residential areas with some narrow streets and many older houses without off-street parking.</p> <p>In setting the parking standards (see Appendix 3 of the Local Plan) the Council has developed a detailed evidence base as set out in the Parking Standards Research (2016), in line with the criteria set out in paragraph 39 of the NPPF.</p> <p>Policy LP 45 also encourages car share facilities and car clubs and sets out specific requirements for the provision of charging facilities for electric vehicles.</p>
<p>5. Supporting high quality communications infrastructure (paras 42-46)</p>		
<p>Support the expansion of the electronic communications networks, including telecommunications’ masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new</p>	<ul style="list-style-type: none"> • Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44. 	<p>The vision for the Local Plan (section 2.2.) sets out that the borough will be a place where innovation and Smart City technology is harnessed to enable innovative digital and communications infrastructure, enabling businesses to respond to customer demand, and to support the borough on its path to becoming smarter.</p> <p>Policy LP 33 will ensure the implementation of this vision by promoting the enhanced connectivity of the borough through supporting infrastructure for high speed broadband and telecommunications. Applications for telecommunications development will be considered in accordance with national policy and guidance. In addition, the policy seeks</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
telecommunications development and existing development. (44)		telecommunications equipment to be of an appropriate design and in a suitable location. There is no blanket or borough-wide Article 4 Direction in relation to telecommunications development, and the policy does not insist on minimum distances.
6. Delivering a wide choice of high quality housing (paras 47-55)		
Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)	<ul style="list-style-type: none"> • Identification of: <ul style="list-style-type: none"> a) five years or more supply of specific deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48) • A SHLAA 	<p>Policy LP 34 of the Local Plan sets out the target for new housing expected to be delivered in the borough, which is 3,150 homes for the period 2015-2025. A housing trajectory and Five Year Land Supply (2017-2022) is set out in the annual Authority's Monitoring Report (AMR), which demonstrates delivery against the London Plan target.</p> <p>The 2015/16 Housing AMR indicates that there are sufficient identified sites in place to exceed the borough's housing targets within the Plan period, also taking into account the 5% buffer.</p> <p>The Borough has identified a potential 2096 units over the 5 year period, which is 521 units more than the target in the London Plan 2015. This exceeds the NPPF requirements of an additional buffer of 5% to ensure choice and competition.</p> <p>In relation to small sites / windfall sites, historically in the borough there has been a reliance on small site provision, mainly due to the character and nature of the borough, with few large sites coming forward. The 2005 Greater London Authority (GLA) Housing Capacity Study included 1700 from small sites based on historical trends on completions from small sites from the last five years of reliable data (1998/9 -2002/03). The London SHLAA and Housing Capacity Study 2009 identified a small site capacity for 2011-2021 of 961 for Richmond (using 2000-2007 data, post garden land adjustment) which equated to 96 per annum. The 2013 SHLAA used historic trends in completions for small sites (2004/5 – 2011/12) with an assumption of 1,754 for 2015-2025. The Council's analysis of historical trends in the last five years</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>shows that the borough achieves on average 179 net completions on small sites. Therefore, the inclusion of windfall sites/small sites is justified in line with paragraph 48 of the NPPF. Any small sites are identified only in the five year housing land supply where permission/prior approval has been granted. An assumption for small windfall sites is only included in the future housing land supply for years six to ten on the basis of this historic pipeline.</p> <p>The GLA coordinates preparation of a joint Strategic Housing Land Availability Assessment (SHLAA) for all the London Boroughs. The basis for the current London Plan is the 2013 SHLAA. The GLA has started work on a new SHLAA to inform the London Plan review. The London Borough of Richmond has already been engaging with the GLA on the new SHLAA and detailed discussions of sites within the SHLAA have already taken place with the GLA.</p>
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<ul style="list-style-type: none"> • Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15 	<p>The Housing Land Supply for Years 6-10 (2022-2027) is set out in the 2015/16 Housing AMR. The AMR identifies the developable sites and locations for Years 6-10, and the anticipated figure from large sites provides an indicative housing land supply of 1,115 homes. By adding the 179 units from small sites (continued assumption) over a 5-year period, the supply for Years 6-10 is 1,575 units, and therefore the London Plan 2015 target will be exceeded.</p> <p>In relation to Years 11-15, the Council considers that there will be some sites which will come forward later, particularly in the borough’s centres such as Richmond, Twickenham and Teddington. However, at present the Council does not feel that there is sufficient certainty to identify sites.</p> <p>It can be assumed that in the latter years of the Plan, housing will be increasingly expected to be met by higher density development and intensification of the existing built environment, subject to the local character of the area and context.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Additional sources of supply are also likely to be identified as part of Crossrail 2, which is currently at an early stage of development and it is unlikely to have powers for its construction until 2023. Therefore, Crossrail 2 will be a matter for the next new Local Plan for this borough.</p>
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)</p>	<ul style="list-style-type: none"> • A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47) 	<p>The 2015/16 Housing AMR includes the housing trajectory and it illustrates the expected rate of housing delivery. Monitoring, completions and permissions are also set out within this AMR.</p> <p>The GLA is currently undertaking a new SHLAA for London as evidence base for the full review of the London Plan. The London Borough of Richmond has already been engaging with the GLA on the new SHLAA and detailed discussions of sites within the SHLAA have already taken place with the GLA.</p>
<p>Set out the authority’s approach to housing density to reflect local circumstances (47).</p>	<ul style="list-style-type: none"> • Policy on the density of development. 	<p>The vision and spatial strategy states that higher density and larger scale developments will be mainly focused within the borough’s main centres and other sustainable locations, such as areas better served by public transport. When considering the density of development, in addition to the public transport accessibility, compatibility with the surroundings and local context, local character, including heritage value, and amenity of existing neighbourhoods and villages will also be taken into account.</p> <p>The borough-wide Sustainable Urban Development Study (2008) sets out the areas in which higher density development is appropriate, and this evidence base has been used to directly inform policy LP 2 of the Local Plan.</p> <p>Policy LP 34 states that development should optimise housing provision for different types of location within the relevant density range taking into account the London Plan Density Matrix. This guidance, along with local factors, such as proximity to facilities and to public transport routes, and the character of the surrounding area, will be taken into account in reaching the appropriate density for a particular site.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)</p>	<ul style="list-style-type: none"> • Policy on planning for a mix of housing (including self-build, and housing for older people • SHMA • Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50) • Evidence for housing provision based on up to date, objectively assessed needs. (50) • Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50) 	<p>Policy LP 1 is also of relevance and it states that proposals should maximise the sites’ opportunities.</p> <p>The Council has undertaken a full review of its housing needs by preparing an up to date Strategic Housing Market Assessment (SHMA) – see the Borough SHMA 2016. The SHMA provides the objectively assessed need based on population projections and market signals, and also considers the size, type and tenure of housing required, and the needs of different groups including families with children, older people, people with disabilities, service families and people wishing to build their own homes. In addition, the Council has produced evidence as set out in the Research on Gypsies and Travellers (2016) to understand and explore their accommodation needs in the borough.</p> <p>The SHMA and the Gypsies and Travellers research have informed the development of the Local Plan and its housing policies. In relation to affordable housing, the borough has one of the highest average house prices in the UK, and a continuing need for affordable housing, particularly for family homes. In the period from 2014 to 2033 a net deficit of 964 affordable homes per annum is identified in the Borough SHMA, demonstrating the need for affordable homes remains substantial. Policy LP 36 therefore expects 50% of all housing units to be affordable housing, with a tenure mix of 40% housing for rent and 10% intermediate housing. On-site provision will be expected on sites capable of ten or more units gross and at least 50% on all former employment sites. On sites below this threshold, a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out within the policy will be required. This policy approach is based on local evidence and research, which the Council considers justifies an affordable housing policy that seeks affordable housing contributions also from smaller sites. This is because small sites make such a significant</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>contribution to housing supply and therefore the cumulative impact of these sites should contribute to affordable housing provision, justified by the evidence base and local circumstances. However, meeting the objectively assessed need for affordable housing in this borough is not realistic due to the limited land supply, in particular the NPPF only requires Local Plans to provide land to meet needs in full insofar as their areas have the sustainable capacity to so, as defined by other policies and having regard to constraints.</p> <p>Policy LP 37 deals specifically with housing needs of different groups. This includes sheltered housing with care support, staffed hostels, residential care homes/nursing homes, extra-care housing, provision by local colleges, hotels and other institutions for their students and/or staff.</p> <p>Policy LP 35 emphasises that development should generally provide family sized accommodation, except within the five main centres and Areas of Mixed Use where a higher proportion of small units would be appropriate. This policy seeks an appropriate mix to accommodate the needs of both young and old people, including options for downsizing.</p>
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54). In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> • Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. • Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53) • Examples of special circumstances to allow new isolated homes listed at para 55. 	<p>Not applicable</p>
<p>7. Requiring good design (paras 56-68)</p>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<ul style="list-style-type: none"> Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues 	<p>The Local Plan places strong emphasis on the quality of development, see specifically policies LP 1 and LP 2. High quality design of new development that respects and enhances an area’s distinctive character will be expected throughout the borough.</p> <p>Visions for the local areas and specific local issues are set out in the Village Planning Guidance SPDs. The Council has developed these SPDs in partnership with the local communities for the village areas of the borough, except for Ham and Petersham, where the relevant Forum for the area is preparing a Neighbourhood Plan. The Village Planning Guidance SPDs identify the key features and characteristics of the village areas that are valued by local communities. In addition, they are the main starting point for design guidance to those seeking to make changes to their properties or to develop new properties in the area. In line with paragraph 59 of the NPPF the policies and SPDs are not unnecessarily prescriptive in detail, and policy LP 1 and LP 2 in particular focus on general guidance relating to scale, density, massing, height etc. In addition, they also do not attempt to impose architectural styles or particular tastes, with the main emphasis of promoting and reinforcing local distinctiveness and character, in line with paragraph 60 of the NPPF.</p> <p>In response to paragraph 61 of the NPPF, policy LP 1 in particular sets out guidance on the relationship of a development site to other buildings, access and layout and co-location and compatibility, with the main aim of securing development that integrates into the existing natural, built and historic environment.</p>
<p>8. Promoting healthy communities (paras 69-77)</p>		
<p>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and</p>	<ul style="list-style-type: none"> Inclusion of a policy or policies on inclusive communities. Promotion of opportunities for 	<p>The provision of high quality and inclusive design providing access for all is a theme throughout the Local Plan, such as the social and community infrastructure policy (LP 28) and the health and wellbeing policy (LP 30),</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>accessible environments; and are accessible developments (69).</p>	<p>meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)</p>	<p>which encourages the creation of inclusive development layouts and public realm that considers the needs of all, including the older population and disabled people.</p> <p>In relation to housing development, high standards for inclusive access are required, specifically, new accommodation will have to meet the internal and external space standards and inclusive access requirements as set out in policy LP 35 on housing mix and standards. This requires 90% of all new build housing to meet Building Regulation Requirement M4 (2) ‘accessible and adaptable dwellings’, and 10% of all new build housing to meet Building Regulation Requirement M4 (3) ‘wheelchair user dwellings’.</p> <p>Policy LP 31 in relation to play space requires play space to be made publicly accessible as this will contribute to creating inclusive environments and developments that integrate with existing neighbourhoods and local communities, thus fostering social cohesion.</p> <p>Policy LP 44 requires civic spaces and public realm to be accessible and inclusive. It also states that developments should be integrated into the surrounding community and existing local routes, and provide for improvements to accessibility for all. In addition, cycling and walking contribute significantly towards creating an attractive and pleasant environment, and therefore new development should include all the facilities needed to encourage a safe walking and cycling environment from first occupation.</p>
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<ul style="list-style-type: none"> • Inclusion of a policy or policies addressing community facilities and local service. • Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of 	<p>Policy LP 28 will ensure that there is adequate provision of community services and facilities, especially in areas where there is an identified need or shortage. This policy recognises that social and community infrastructure facilities provide for the health, welfare, social, education, spiritual, recreational, leisure and cultural needs of the community.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.</p>	<p>Development pressures and high land values in the borough mean there is pressure to redevelop sites and it can be difficult to find new sites for community use. Therefore, policy LP 28 sets out criteria to ensure there is no unnecessary loss of valued facilities and services. Local Plan policies require evidence to justify the loss of an essential local facility, such as community and social infrastructure uses, pubs as well as local shops and services.</p> <p>In general, the Local Plan’s spatial strategy and its policies encourage major development and higher density development in the most sustainable locations, such as within the borough’s centres and those served well by public transport. These areas also offer a range of community facilities as well as key services and infrastructure. In addition, policy LP 27 ensures the protection of local shops and services so that all residents have essential facilities within reasonable walking distance. This is particularly important to the elderly or less mobile shoppers as well as those with young children or those without cars.</p>
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</p>	<ul style="list-style-type: none"> • Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75) 	<p>Policy LP 12 protects and supports the provision of a multi-functional network of green infrastructure and it sets out the borough’s Public Open Space Hierarchy, which follows the categorisation of the London Plan and provides for a range of open spaces for formal and informal recreation.</p> <p>The specific needs and quantitative or qualitative deficits in relation to open space, sports and recreation facilities in the borough are set out in the following evidence base documents:</p> <ul style="list-style-type: none"> • Open Space Needs Assessment (2015) • Indoor Sports Facilities Needs Assessment (2015) • Playing Pitch Strategy (2015) • Playing Pitch Assessment (2015) <p>The above evidence base has been used to directly inform the development</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>of the Local Plan policies, specifically in relation to policy LP 31, which seeks the protection and enhancement of Public Open Space, children's and young people's play facilities as well as formal and informal sports grounds and playing fields.</p> <p>Policies LP 12, LP 13 and LP 14 set out how the Council seeks to protect, enhance and improve access to the borough's parks and open spaces; this includes designations relating to Green Belt, Metropolitan Open Land, Local Green Space and Other Open Land of Townscape Importance.</p> <p>Policy LP 44 covers public rights of way as well as access.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – 'Local Green Space' (76-78).</p>	<ul style="list-style-type: none"> • Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78) 	<p>Policy LP 13 covers the Local Green Space designation and sets out criteria that the Council will take into account when assessing applications for Local Green Space designations. The Local Plan seeks to designate one site in the borough as Local Green Space, i.e. Udney Park Playing Fields, following an application by the Friends of the Udney Park Playing Fields. In addition, the policy states that managing development within a Local Green Space will be consistent with policy for Green Belt.</p> <p>The Ham and Petersham Neighbourhood Forum is currently preparing a Neighbourhood Plan for the Ham and Petersham area. This process will also allow them to designate Local Green Spaces within their area in accordance with the NPPF.</p>
<p>9. Protecting Green Belt land (paras 79-92)</p>		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and</p>	<ul style="list-style-type: none"> • Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> ○ Enhance the beneficial use of the Green Belt. (81) ○ Accord with criteria on boundary 	<p>Policy LP 13 sets out the policy on Green Belt and Metropolitan Open Land (MOL). MOL is unique to London and protects strategically important open spaces within the built environment, and Green Belt policies (including paragraphs 79-92 of the NPPF) apply equally to MOL. The policy clearly specifies that inappropriate development should not be approved except in very special circumstances. The NPPF's exceptions to inappropriate</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	<p>setting, and the need for clarity on the status of safeguarded land, in particular. (85)</p> <ul style="list-style-type: none"> ○ Specify that inappropriate development should not be approved except in very special circumstances. (87) ○ Specify the exceptions to inappropriate development (89-90) ○ Identify where very special circumstances might apply to renewable energy development. (91) 	<p>development are already within the NPPF and therefore this does not need to be repeated in the Local Plan. Additional criteria in MOL and Green Belt are set out in the policy to ensure ‘general conformity’ with the London Plan policy on MOL.</p> <p>The policy encourages enhancement to the Green Belt or MOL for example by landscaping, removal or replacement of inappropriate fencing and screening, and reduction of the visual impact of traffic or car parking as well as opening up views into and out of the Green Belt or MOL.</p> <p>This Local Plan review retains all Green Belt boundaries as existing. In addition, with the exception of one site (Harrodian School – see Proposals Map Changes document), all MOL boundaries remain as existing.</p>
<p>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</p>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<ul style="list-style-type: none"> ● Planning of new development in locations and ways which reduce greenhouse gas emissions. ● Support for energy efficiency improvements to existing building. ● Local requirements for a building’s sustainability which are consistent with the Government’s zero carbon buildings policy . (95)) 	<p>The Local Plan contains various policies relating to climate change mitigation and climate change adaptation. LP 20 focuses on climate change adaptation and LP 21 on flood risk, sustainable drainage and flood defences. Policy LP 22 on sustainable design and construction seeks to ensure that new development minimises energy use and requires use of decentralised energy, low and zero carbon technologies to minimise carbon dioxide emission reductions where possible. Policy LP 23 seeks to protect the borough’s water resources and supplies whilst policy LP 24 seeks sustainable waste management practices in all developments.</p> <p>Policy LP 22 sets out specific requirements for reductions in carbon dioxide emissions in line with London Plan policy; this includes ‘zero carbon’ standards for all new major residential developments, whereby introduction</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>for major non-residential development is expected from 2019 onwards. All other residential buildings should achieve a 35% reduction in regulated carbon dioxide emissions over Building Regulations 2013. Evidence and justification including viability was considered by the Mayor of London’s examination into the Minor Alterations to the London Plan. In addition, a Whole Plan Viability (2016) study supports the Local Plan and considers the cumulative assessment of all of the emerging plan policies, proposals and requirements (including those relating to sustainable design and construction).</p> <p>London is classified as 'seriously' water stressed, meaning that more water is taken from the environment than the environment can sustain in the long term. Therefore, high standards of water efficiency will be required in new developments in order to address the fact that drinking water is becoming an increasingly limited resource in this borough. This justifies the adoption of the 'optional' higher national technical standard for water consumption of 110 litres per person per day (including an allowance of 5 litres or less per person per day for external water consumption) in line with the national technical standard set out in the Building Regulations 2013.</p>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<ul style="list-style-type: none"> • A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co- 	<p>Policy LP 22 requires developers to incorporate measures to improve energy conservation and efficiency and to contribute to renewable and low carbon energy generation.</p> <p>Decentralised energy is also required in the Local Plan. In particular, development proposals of 50 units or more, or new non-residential development of 1,000sqm or more, will be required to provide an assessment of the provision of on-site decentralised energy networks and combined heat and power. The borough-wide Heat Mapping Study (2012) identified clusters within the borough with opportunities</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<p>locating potential heat customers and suppliers. (97)</p> <ul style="list-style-type: none"> Account taken of the impacts of climate change. (99) Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) Policies to manage risk, from a range of impacts, through suitable adaptation measures 	<p>Policy LP 20 promotes and encourages development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property. Therefore, new development, in their layout, design, construction, materials, landscaping and operation, should minimise the effects of overheating as well as minimise energy consumption in accordance with the cooling hierarchy as set out in the policy.</p> <p>Policy LP 21 deals specifically with flood risk, sustainable drainage and flood defences. This policy takes forward the NPPF’s objectives and aims in relation to steering development away from flood risk areas. The Council’s Strategic Flood Risk Assessment (SFRA) (2016) and its recommendations have directly informed policy LP 21.</p>
<p>Take account of marine planning (105)</p>	<ul style="list-style-type: none"> Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development Integrate as appropriate marine policy objectives into emerging policy Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS 	<p>The Local Plan includes a dedicated policy (LP 18) on the borough’s rivers, which includes the River Thames, and this ensures that the natural, historic and built environment of the River Thames corridor is protected. The Council has established close co-operation with the Port of London Authority and the Environment Agency. In addition, the London Plan’s Blue Ribbon Network policy (7.24) also applies in this borough.</p> <p>Comments have not been received by the Marine Management Organisation during the Regulation 18 and Regulation 19 consultations. It is noted that the emerging South East Marine Plan area (February 2017) is important for the ports and shipping sector, which contribute to the national economy, particularly Felixstowe and Dover. However, this aspect is not applicable to the London Borough of Richmond. The Marine Plan area is also important for marine conservation, with 6 special areas of conservation and 14 special protection areas, none of which overlap with the authority’s area for the London Borough of Richmond. In addition, coastal management is not applicable in this borough.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Manage risk from coastal change (106)	<ul style="list-style-type: none"> • Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas. • Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate. 	Not applicable
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	<ul style="list-style-type: none"> • A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. • Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs. 	<p>Policy LP 12 protects and supports the provision of a multi-functional network of green infrastructure and policy LP 18 seeks to protect the borough’s river corridors.</p> <p>Policy LP 15 states that the Council will protect and enhance the borough's biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats.</p> <p>Policy LP 16 requires the protection of existing trees and woodlands as well as the provision of new trees, shrubs and other vegetation of landscape significance that complement existing.</p> <p>Policy LP 17 requires the incorporation of green roofs and/or brown roofs into new major developments. Green roofs are multi-functional and one of the many benefits is the enhancement of biodiversity and provision of important refuges for wildlife in urban areas.</p> <p>Policies in relation to agricultural land, National Parks and AONBs are not</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Prevent unacceptable risks from pollution and land instability (109)</p>	<ul style="list-style-type: none"> Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity. 	<p>applicable.</p> <p>Policy LP 10 (Local Environmental Impacts, Pollution and Land Contamination) states that the Council will seek to ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land. These potential impacts can include, but are not limited to, air pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle as well as land contamination.</p> <p>In relation to air quality, developers should commit to 'Emissions Neutral' development where practicable, and strict mitigation for developments to be used by sensitive receptors such as schools, hospitals and care homes in areas of existing poor air quality will be required.</p> <p>The Council also encourages good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected.</p> <p>The policy also seeks remediation of contaminated land where development comes forward and requires potential contamination risks to be properly considered and adequately mitigated before development proceeds.</p> <p>Artificial lighting should not lead to unacceptable impacts; in particular, floodlighting will only be permitted provided there is no demonstrable harm to character, biodiversity, amenity or living conditions (see policy LP 9).</p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> Identification and mapping of local ecological networks and geological conservation interests. Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species 	<p>Policy LP 15 states that the Council will protect and enhance the borough's biodiversity, in particular, but not exclusively, the sites designated for their biodiversity and nature conservation value, including the connectivity between habitats. Weighted priority in terms of their importance will be afforded to protected species and priority species and habitats including National Nature Reserves, Sites of Special Scientific Interest (SSSI) and Other Sites of Nature Importance (OSNI) as set out in the Biodiversity Strategy for England, and the London and Richmond upon Thames Biodiversity Action Plans.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>The Local Plan Proposals Map identifies sites designated for nature conservation purposes, including SSSI and OSNI.</p> <p>The Council commissioned consultants Salix Ecology to undertake habitat surveys at five sites across the borough with the view to establish whether the sites would qualify for designation. The Proposals Map Changes document sets out the changes to be made to the OSNI designations as part of the Local Plan, along with the reasons and justifications.</p>
<p>12. Conserving and enhancing the historic environment (paras 126-141)</p>		
<p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p>	<ul style="list-style-type: none"> • A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. • A map/register of historic assets • A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126) 	<p>The Council's positive strategy for the historic environment, as required by national guidance, is made up of the following (this list is not exhaustive):</p> <ul style="list-style-type: none"> • The Local Plan policies relating to heritage assets, including LP 3 Designated Heritage Assets, LP 4 Non-Designated Heritage Assets, LP 5 Views and Vistas, LP 6 Royal Botanic Gardens, Kew World Heritage Site and LP 7 Archaeology • Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPDs) on heritage assets, including on locally listed buildings, and Village Planning Guidance SPDs • Maintaining and, if required reviewing, Conservation Area boundaries as well as Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans • Ensuring Listed Buildings (including locally listed buildings) are maintained and contribute to the character of the place • Article 4 Directions • Site briefs / Masterplans for sensitive sites <p>The Local Plan Proposals Map identifies sites designated for historic environment purposes. This includes the Conservation Areas, Scheduled Ancient Monuments and the Historic Parks and Gardens that are on the</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Historic England Register.</p> <p>The borough also has approximately 1,115 Listed Buildings and around 12,500 locally listed buildings; due to the large number of these historic assets, these are not included in the Proposals Map, however, registers are available on the Council’s website: see the Listed Building Register (last updated February 2017) and the Register of Buildings of Townscape Merit (i.e. locally listed buildings.)</p> <p>The key policies within the Local Plan, which require new development to make a positive contribution to character and distinctiveness, are the heritage policies listed above as well as LP 1 and LP 2.</p>
<p>13. Facilitating the sustainable use of minerals (paras 142-149)</p>		
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>Whilst the London Borough of Richmond upon Thames is the mineral planning authority for its area, there are no areas in the borough identified or expected to be identified for mineral extraction. The London Borough of Richmond belongs to the London Aggregates Working Party. The London Plan only gives a minerals apportionment to four boroughs (which produce their own Local Aggregates Assessment (LAA)). The LAA 2014 has been produced by the Mayor, on behalf of the 29 boroughs that do not have land won minerals sites. No sites or wharves are identified within Richmond upon Thames.</p> <p>The Local Plan contains policy LP 24 in relation to waste management. In addition, policy LP 22 Sustainable Design and Construction seeks to ensure that all new development and refurbishment is as sustainable as possible; this includes minimising the consumption of resources during construction and occupation, and the policy encourages use of recycled or secondary aggregates in construction.</p>
<p>Justified: The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. To be ‘justified’ a DPD needs to be:</p>		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. 		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	<p>Public consultation has been carried out in line with the Council’s Statement of Community Involvement (SCI), available on the Council’s website:</p> <ul style="list-style-type: none"> • Statement of Community Involvement (adopted 2006) • Addendum to the Statement of Community Involvement (2009) • Addendum to the Statement of Community Involvement (2015) <p>The Council has summarised the consultation that took place during preparation of the Plan in two separate Consultation Statements:</p> <ul style="list-style-type: none"> • The Local Plan Statement of Consultation Part I (January 2017) includes the scoping consultation (carried out early 2016) and the pre-publication (Regulation 18) consultation (carried out during the summer 2016) • The Statement of Consultation Part II (May 2017) includes the summary of main issues raised and the responses received during the Publication (Regulation 19) consultation (carried out early 2017) <p>In relation to ‘hard to reach groups’, the SCI recognises that some residents are often under-represented and hard to reach individually. These include ethnic minorities, older people, youth and disabled people. These groups are now considered to have representation through local groups, which officers work with directly. Over the last decade, the Council has built up an extensive database of groups and individuals that are consulted on a regular basis on local plan making activities, and this includes ‘hard to reach’ groups. There are in total approximately 1,700 contacts within the Local Plan database, and this includes a variety of residents’ and local amenity groups and societies as well as groups such as Age Concern, Age UK Richmond upon Thames, local youth clubs, the local Disability Action & Advice Centre, the Ethnic Minorities Advocacy Group based in the borough, the Inter Faith</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Forum, the Richmond Council for Voluntary Service, which works with charities, voluntary organisations, community groups, social enterprises and individuals looking to start up a new organisation with a social purpose. In addition, the Local Plan database also includes the London Gypsy and Traveller Unit, the National Federation of Gypsy Liaison Groups as well as the Friends, Families and Travellers service.</p> <p>Also see the Duty to Co-operate Statement (May 2017) in relation to consultation and engagement carried out with the prescribed Duty to Co-operate bodies.</p>
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by. <p>AND</p> <ul style="list-style-type: none"> Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions. <p>OR</p> <ul style="list-style-type: none"> A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences. <p>OR</p> <ul style="list-style-type: none"> For each policy (or group of policies 	<p>The Council considers that the Local Plan is justified by sound and robust evidence. The submission of the Local Plan is accompanied by borough-specific evidence base documents, all of which are available on the Council's website and have been supplied to the Planning Inspectorate. A list of the key evidence documents is supplied below (for a full list, see the Council's website):</p> <ul style="list-style-type: none"> Strategic Housing Market Assessment (2016) 2015/16 Housing AMR Research on Gypsies and Travellers (2016) Whole Plan Viability (2016) Infrastructure Delivery Plan (2017) Parking Standards Research (2016) Employment Sites & Premises Study Update (Stage 1) (2016) Employment Sites and Premises Study Update (Stage 2) (2017) Borough-wide assessment of Office Stock (2015) Assessment of Light Industrial and Storage Stock (2016) and Appendices Open Space Needs Assessment (2015) Indoor Sports Facilities Needs Assessment (2015) Playing Pitch Strategy (2015) Playing Pitch Assessment (2015)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD).</p>	<ul style="list-style-type: none"> • Richmond Borough Retail Study (2014) • Vacancy rates in the Borough's centres (2016) • Town Centre Health Checks (2013) • Analysis of Town and Local Centres 2006/7 (incorporating health checks for main town centres) • Heat Mapping Study (2012) • Sustainable Urban Development Study (2008) • LB Richmond School Place Planning Strategy (2015) • Strategic Flood Risk Assessment (SFRA) (2016) • Flood Risk Sequential Test Report (2016) • Article 4 Directions – Office to Residential (2014-16) • Article 4 Direction – Shops to Financial and Professional Services (2016/17) • Basement Developments – Review of Planning Implications: Main Report and Appendices (2014) • Cabinet Member decision containing justification and evidence in relation to Basement Article 4 Directions (2017) • Article 4 Directions – Basements and Subterranean Developments (2017) • Other evidence is also contained within the Council's Authority's Monitoring Report <p>The Local Plan has been subject to Sustainability Appraisal throughout the plan-making stages and all necessary requirements have been complied with. Reasonable alternatives for policies and proposals have been considered as part of the Sustainability Appraisal (SA) process to ensure the policies and proposals are reasonable and justified.</p>
<p><i>Alternatives</i> Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives?</p>	<ul style="list-style-type: none"> • Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for 	<p>Reasonable alternatives were prepared and considered within the Sustainability Appraisal (SA). The Local Plan has been subject to SA throughout the plan-making stages and all necessary requirements have been complied with.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<p>selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies.</p> <ul style="list-style-type: none"> • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies. 	<p>The relevant SA documents are:</p> <ul style="list-style-type: none"> • Draft Sustainability Appraisal Scoping Report (December 2015) – this sets out the key issues and relevant evidence base against which the Plan has been assessed. Following the consultation and consideration of responses received on the SA Scoping Report, a final SA Scoping Report (2016) was published. • Sustainability Appraisal of the Pre-Publication Local Plan (July 2016) – this includes the assessment of options and alternatives for the policies and proposals, including site allocations, as set out within the Plan • Sustainability Appraisal of the Publication Local Plan (January 2017) – this includes how the SA process has influenced the choice of the strategy and content of policies in terms of what difference the SA process has made <p>In addition, the consultation on the scope and rationale for review of planning policies (including Appendix 1: Detailed review of existing policies) included the consideration of potential alternatives/options as part of the review of the existing policies contained within the Core Strategy (2009) and Development Management Plan (2011).</p> <p>The second consultation on the Plan (the Regulation 18 Pre-Publication consultation) included sections on ‘Why we are reviewing this policy area’ and ‘What the evidence says’, which was informed by the alternatives and options that were assessed in the SA.</p>
<p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be ‘effective’ a DPD needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it 		

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored 		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan’s vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<ul style="list-style-type: none"> • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans). • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix). 	<p>Section 13 of the Plan sets out the implementation and delivery of the Plan. This is supported by an updated Infrastructure Delivery Plan (2017) which incorporates a schedule of projects with timescales. The 2015/16 Housing AMR includes timescales for developments.</p> <p>The Council has carried out extensive consultations on the Plan and in particular an informal consultation was undertaken early 2016 to seek early feedback and input from the Duty to Co-operate bodies and other key stakeholders as well as interested parties and groups on the scope of the review of the existing policies within the Core Strategy and Development Management Plan. Therefore, the Plan has been informed by the priorities of other agencies and services (such as the Environment Agency, Richmond Public Health, Richmond’s Clinical Commissioning Group, Achieving for Children which is the Council’s Education delivery partner etc.). Furthermore, policies within the Plan have been informed by extensive duty to co-operate engagements and activities as set out in the Duty to Co-operate Statement (May 2017).</p> <p>The Plan has been prepared in line with the updated Local Development Scheme (2017), which shows how the existing and emerging plans provide a coherent policy framework for the borough.</p> <p>The Local Plan’s strategic vision describes what the borough will be like in 2033. It is set out in section 2.2 of the Local Plan, which has 3 inter-related themes of ‘Protecting Local Character’, ‘A Sustainable Future’ and ‘Meeting People’s Needs’. These three themes provide the basis for the Strategic Vision and they are the golden thread that runs through the Local Plan.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Section 2.3 of the Local Plan sets out the strategic objectives for the Local Plan, and they outline what will need to be achieved to deliver the Local Plan's strategic vision.</p> <p>Section 3 of the Local Plan sets out the spatial strategy, which builds on information from the borough's evidence base, including feedback from public consultations. It also sets out how the main elements of the strategic vision and strategic objectives for the borough are to be delivered over the plan period from 2018 to 2033.</p> <p>The Local Plan's policies follow logically from the vision, objectives and spatial strategy, and they follow the structure of the 3 inter-related themes of 'Protecting Local Character', 'A Sustainable Future' and 'Meeting People's Needs'. The Council considers that there are no policy gaps and each objective can be linked to a relevant policy in the plan.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? 	<ul style="list-style-type: none"> • A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule. 	<p>Section 13 of the Plan sets out the implementation and delivery of the Plan. In essence, the Local Plan will be implemented and delivered through a combination of private sector investment, the work of other agencies and bodies and the Council's own strategies and initiatives.</p> <p>The majority of new development identified in the Plan's site allocations, particularly investments in new infrastructure, housing and jobs, will be delivered by the private sector.</p> <p>The Council has also updated and published an updated Infrastructure Delivery Plan (IDP), which incorporates an Infrastructure Delivery Schedule, and together it sets out the range of plans, programmes and strategies, including those of partner organisations and agencies.</p> <p>The IDP was prepared in collaboration and partnership working with the infrastructure and service providers. It sets out responsibilities for the delivery of each scheme/infrastructure, funding arrangements where known and likely timescales of delivery.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>In addition, infrastructure providers, key agencies and other key stakeholders have been consulted throughout the preparation of the Local Plan, and the Consultation Statements set out how their comments have been taken into account.</p> <p>In addition, a Whole Plan Viability (2016) study supports the Local Plan and considers the cumulative assessment of all of the emerging plan policies, proposals and requirements. This has taken account of the delivery of affordable housing as well as the Borough’s and Mayoral CIL.</p> <p>The Borough’s CIL is of importance in delivering strategic infrastructure; see the Borough’s CIL Charging Schedule and the Regulation 123 List, i.e. the list of infrastructure projects and/or types of infrastructure that the Council intends to fund in whole or in part from CIL revenue.</p>
<p><i>Co-ordinated Planning</i> Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> Sections of the DPD that reflect the plans or strategies of the local authority and other bodies Policies which seek to pull together different policy objectives Expressions of support/representations from bodies responsible for other strategies affecting the area 	<p>The Local Plan pulls together the objectives of a wide range of strategies such as those relating to education and school place planning, health, air quality, transport and health etc. into a cohesive spatial strategy. The Local Plan goes far beyond traditional land use planning by setting out a clear vision as to what the borough will be like in 2033, which is supported by strategic objectives that outline what will need to be achieved to deliver the Local Plan’s strategic vision. The Local Plan’s policies follow logically from the vision, objectives and spatial strategy and they demonstrate how the policies will deliver collectively the different policy objections.</p> <p>The Council has carried out extensive consultation, including with Duty to Co-operate bodies as well as partner agencies and key stakeholders. Representations from bodies responsible for other strategies have been received and taken into account in the preparation of the Plan.</p>
<p><i>Flexibility</i> • Is the DPD flexible enough to</p>	<ul style="list-style-type: none"> Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when 	<p>The Council considers that the Local Plan is regarded as sufficiently flexible to respond to unexpected changes in circumstances.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>respond to a variety of, or unexpected changes in, circumstances?</p> <ul style="list-style-type: none"> Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<p>policies might need to be reviewed.</p> <ul style="list-style-type: none"> Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ol style="list-style-type: none"> the effectiveness of policies and what evidence is being collected to undertake this changes affecting the baseline information and any information on trends on which the DPD is based Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required. 	<p>Ongoing monitoring of the Local Plan, for example through the Authority’s Monitoring Report, and regular reviews of the Infrastructure Delivery Plan, will highlight if changes to the timescales are required.</p> <p>The Local Plan is supported by a Monitoring Framework, which sets out how the effectiveness of the Plan’s policies will be monitored.</p>
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken 	<ul style="list-style-type: none"> A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A ‘tick box’ approach or a collection of 	<p>Extensive Duty to Co-operate engagements and activities has taken place through the development of the Local Plan, as set out in the Duty to Co-operate Statement (May 2017).</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>appropriately for the plan being examined?</p> <ul style="list-style-type: none"> Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies? 	<p>correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why.</p> <ul style="list-style-type: none"> The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate. 	<p>In summary, the following was undertaken:</p> <ul style="list-style-type: none"> First consultation (non-statutory): The Council has carried out extensive consultations on the Plan, and in particular an informal consultation was undertaken from 4 January until 1 February 2016 to seek early feedback and input. This public consultation focused on the rationale and scope for the review of the existing policies, alongside the proposed sites to be allocated or designated for protection, and it was an additional stage of consultation by the Council (not prescribed by the Local Planning Regulations 2012) to provide the opportunity for early engagement with Duty to Co-operate bodies. Specific engagement activities were undertaken at this stage with the Duty to Co-operate bodies considered of relevance to the Local Plan including neighbouring boroughs, the GLA and other statutory consultees. Meetings were held with the Environment Agency, Historic England, NHS England and Richmond CCG, Greater London Authority and Transport for London, Elmbridge BC, LB Hammersmith and Fulham, LB Hounslow, RB Kingston, Spelthorne DC and LB Wandsworth. Natural England confirmed that due to time and resource constraints they would deal with the Council through written correspondence. Holding a series of Duty to Co-operate meetings at this early stage in the Local Plan review was useful to explain and discuss the Council's approach and ideas to the review of the policies, including any emerging changes to policy approaches and evidence, such as in relation to employment and housing. We also explored pooling of resources and common objectives. Second consultation (statutory): During the Pre-Publication consultation from 8 July until 19 August, the Council sent individual and bespoke emails on a one to one basis to each of the prescribed bodies considered of relevance to the Local Plan. These built upon

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>the scoping consultation meetings and where applicable subsequent responses, setting out the main issues that identified any strategic and/or cross-boundary issues previously discussed, any updates to the Council’s evidence base, and what the Council was taking forward in the draft Local Plan. Specific Duty to Co-operate meetings were not proposed but the offer to meet was made; no meeting requests were received and the majority of the correspondence on Duty to Co-operate matters was in writing.</p> <ul style="list-style-type: none"> • A Duty to Co-operate Statement (January 2017) was produced to support the Publication (Regulation 19) consultation. • Third consultation (statutory): The Publication (Regulation 19) consultation was undertaken from 4 January until 15 February 2017. Prior to the commencement of the consultation, the Council sent individual and bespoke emails on a one to one basis to each of the prescribed bodies considered of relevance to the Local Plan. These built upon the latest correspondence with the Duty to Co-operate bodies during the Pre-Publication stage, setting out the main issues that identified any strategic and/or cross-boundary issues previously discussed, any updates to the Council’s evidence base, and what the Council is taking forward in the final Publication Local Plan. In addition, where relevant, the bespoke emails highlighted the changes made since the Pre-Publication Plan. At that stage, specific Duty to Co-operate meetings were not proposed; however, we offered to meet or arrange a telephone conference to discuss any pertinent issues. The only meeting that was held was with RB Kingston to exchange updates on the respective plans’ progresses. <p>The updated Duty to Co-operate Statement (May 2017) provides further details, including a matrix which summarises the discussions had and issues identified, by each of the identified prescribed bodies and by each strategic issue.</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Section 13 of the Plan sets out the implementation and delivery of the Plan and its policies. In essence, the Local Plan will be implemented and delivered through a combination of private sector investment, the work of other agencies and bodies and the Council's own strategies and initiatives. Together with the Duty to Co-operate Statement, the updated Infrastructure Delivery Plan (IDP) (2017), which incorporates an Infrastructure Delivery Schedule, sets out the range of plans, programmes and strategies, including those of partner organisations and agencies. The IDP was prepared in collaboration and partnership working with the infrastructure and service providers. It sets out responsibilities for the delivery of each scheme/infrastructure, funding arrangements where known and likely timescales of delivery.</p>
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? 	<ul style="list-style-type: none"> • Sections of the DPD setting out indicators, targets and milestones • Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories • Reference to any other reports or technical documents which contain information on the delivery of policies • Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal 	<p>Section 13.5 of the Local Plan states that the Council has well-established and up-to-date monitoring systems in place for a range of key planning indicators. A wide variety of data on planning decisions and completions have been collected and analysed since the 1980s. Indicators monitor the effectiveness of the policies and strategies over time, including against set targets where appropriate. Indicators, and where required targets, are reviewed regularly and where necessary have been amended to ensure the monitoring framework reflects national and regional requirements, and to ensure that the adopted policies continue to be monitored in the most meaningful way.</p> <p>Authority’s Monitoring Reports (formerly known as Annual Monitoring Reports) have been published on the Council’s website since 2004. Key aspects of monitoring, including on housing land supply, continue to be undertaken on an annual basis and are reported as part of the Authority’s Monitoring Reports. The data collected as part of the preparation of the Monitoring Reports also feed into monitoring systems set up by the Greater London Authority (i.e. the London Development Database). Other reports,</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>such as the Infrastructure Delivery Plan are also regularly reviewed and updated.</p> <p>For the purpose of the Local Plan, the existing monitoring framework has been reviewed to ensure that the policies and proposals set out in the Plan can be effectively monitored. The revised Monitoring Framework (May 2017) includes and identifies significant effects indicators, which form part of the Sustainability Appraisal process. In reviewing the monitoring framework, the Council also considered the value of retaining existing relevant indicators to provide time series information showing change over time. Although the Council has tried to anticipate future monitoring requirements, it is recognised that there will inevitably be new aspects to monitor.</p> <p>Therefore, the monitoring framework should be considered as having a degree of flexibility, to adapt to change, and it will be regularly reviewed.</p> <p>Note that existing indicators, and where applicable targets, in relation to the Twickenham Area Action Plan are not being amended as part of this Local Plan Review.</p>
<p>Consistent with national policy: <i>the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<ul style="list-style-type: none"> Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. Evidence provided from the sustainability appraisal (including 	<ul style="list-style-type: none"> Objectively assessed needs: The NPPF requires objectively assessed needs for housing (both market and affordable) as well as economic development (including main town centre uses). In relation to objectively assessed housing needs, the Local Plan is underpinned by a Strategic Housing Market Assessment (SHMA) (2016) for Richmond borough. The SHMA provides the objectively assessed need based on population projections and market signals, and also considers the size, type and tenure of housing required, and the needs of different groups including families with children, older people, people with disabilities, service families and people wishing to build their own

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>reference to the sustainability report) and/or from the results of community involvement.</p> <ul style="list-style-type: none"> • Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement • Reports or copies of correspondence as to how representations have been considered and dealt with. 	<p>homes. The SHMA concludes that the unconstrained demographic-based need for housing in the borough is for around 1,047 dwellings per annum in the period from 2014 to 2033. However, relevant housing targets for the borough are derived from the London Plan, which takes account of limited land supply, and as such the current dwellings per annum target is 315. In addition, in the period from 2014 to 2033 a net deficit of 964 affordable homes per annum is identified in the Borough SHMA, demonstrating the need for affordable homes remains substantial. The Borough’s <u>2015/16 Housing AMR</u> indicates that there are sufficient identified sites in place to exceed the borough’s housing targets within the Plan period, also taking into account the 5% buffer. Whilst the Local Plan does not meet the objectively assessed housing need, local evidence and justification elaborates upon the reasons as to why this need cannot be met. Therefore, there is no conflict with the NPPF as paragraph 14 makes clear that needs should not be met if:</p> <ul style="list-style-type: none"> - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or - specific policies in this Framework indicate development should be restricted. <ul style="list-style-type: none"> • In relation to assessing economic development needs, the Council has prepared detailed evidence as part of the <u>Employment Land Study Updates</u> in 2016 and 2017. This identifies a need to increase office provision in the borough, particularly as a result of the loss of offices through Permitted Development Rights, to meet a 120,000sqm requirement until 2033. In relation to industrial land, the borough has only 25 hectares left and lost approximately a third of its reservoir in just five years. The Study identifies a need for just under 80,000sqm of industrial floorspace, which relates to a land requirement of approximately 20 hectares.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>In reality, taking account of the limited land supply in the borough as well as the high values of land, it is unrealistic to assume that the Local Plan can meet objectively assessed needs in relation to employment land. However, the detailed analysis and Studies support the justification for introducing strengthened employment policies.</p> <ul style="list-style-type: none"> • In relation to other town centre needs, the Council's <u>Retail Study (2014)</u> estimates that a modest increase in retail (including separate forecasts for A4/A4/A5) can be met (as detailed above). • Local Parking Standards: Transport for London (TfL) objected to policy LP 45 and the proposed maximum parking standards. This was then raised in the Mayor of London's response (which was received after the closing deadline for the Regulation 19 consultation and is therefore being treated as a 'late' response. Whilst the Council acknowledges that the parking standards for vehicles as set out in Appendix 3 of the Local Plan differ from the London Plan, the Council considers its parking standards to be in 'general conformity' with the London Plan. In particular, the Council has developed a detailed evidence base as set out in the <u>Parking Standards Research (2016)</u>, in line with the criteria set out in paragraph 39 of the NPPF for setting local parking standards, which provides the local justification. To date, no further details have been provided to the Council by TfL and it appears that TfL have not considered the borough's specific evidence and local justification when responding to the Publication consultation. <p>Policy LP 45 has also been subject to Sustainability Appraisal. In addition, the <u>Parking Standards Research (2016)</u> included an assessment of options against 3 key sustainability objectives. This showed that each option is anticipated to have a mixture of positive and negative effects. It demonstrates that the adopted London Plan standards are anticipated to have a balanced outcome by favouring sustainable transport but</p>

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>increasing car dependency and environmental implications. In contrast, the standards that are now incorporated in the Local Plan are expected to result in the greatest net benefits; although it will increase car dependency and environmental implications, it will significantly favour the local highway network by reducing on-street parking pressures and improving highway safety.</p> <ul style="list-style-type: none"> St Mary’s University and Metropolitan Open Land: The GLA has been invited to make representations throughout the preparation of this Plan. However, it was not until the late response was received by the Mayor of London on the Regulation 19 consultation that they raised ‘non-conformity’ issues in relation to St Mary’s University (Site Allocation SA 8) as they consider that due to the majority of the site being designated Metropolitan Open Land (MOL), it is not appropriate to allocate the site for development. The proposal site SA 8 has only undergone very limited changes and updates since the Regulation 18 consultation, where the Mayor did not raise specific issues relating to this site. Policy SA 8 acknowledges that this is a very constrained site (77% of the campus is designated as MOL). The Council is currently producing in co-operation with the University a Masterplan SPD for the estate in the borough. A consultation on ideas and options for development that take account of MOL constraints takes place until 22 May. This includes considering increased densities on land not designated as MOL and reducing the size of built facilities and floorspace to the absolute minimum necessary to ensure efficiency. Whilst the aim is to maximise development opportunities on non-MOL land, the SPD will also consider the potential need for ‘very special circumstances’. Therefore, the Council believes that SA 8 is in ‘general conformity’ with the London Plan. There are no development proposals for the site, and ideas and options are being considered in terms of how the St Mary’s University estate could be developed, which will inform the development of the SPD later in 2017.

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Any planning application would need to be fully considered against MOL policy requirements and other policies in the development plan.</p> <ul style="list-style-type: none"> • All the policies contained within the Local Plan add further detail and guidance to national policy, and therefore the Council considers that there are no policies in the Local Plan that do not add anything to existing national guidance. • The Consultation Statements set out how comments receiving during the preparation of the Plan at the various public consultation stages have been considered and dealt with; see the Statement of Consultation Part I (January 2017), and the Statement of Consultation Part II (May 2017).

Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (LPAs) make their own assessment of need for the purposes of planning
- That LPAs work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

Policy Expectations	Possible Evidence	Evidence Provided
<p>Policy A: Using evidence to plan positively and manage development (para 6)</p>		
<p>Early and effective community engagement with both settled and traveller communities.</p>	<ul style="list-style-type: none"> • Early and effective engagement undertaken, including discussing travellers’ accommodation needs with travellers themselves, their representative bodies and local support groups. 	<p>There is one existing Traveller site in the borough, which is located in Hampton and contains 12 pitches. The site is managed by Richmond Housing Partnership (RHP).</p> <p>The Council has produced evidence as set out in the Research on Gypsies and Travellers (2016) to understand and explore their accommodation needs in the borough. Early and effective engagement took place during 2013 and 2015, where surveys were carried out in the form of questionnaires with the families living on the Traveller Site in Hampton. In 2013 surveys from eight pitches were completed and in 2015 from seven pitches.</p>
<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.</p>	<ul style="list-style-type: none"> • Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. • Collaborative working with neighbouring local planning authorities. • A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions. 	<p>The Richmond Housing Partnership (RHP), on behalf of the Council, liaised with the travellers on the site in Hampton and carried out the surveys.</p> <p>The Council’s Research on Gypsies and Travellers (2016), which assessed future needs, has informed policy LP 37, which focuses on housing needs of different groups. The policy seeks to protect the existing Traveller site at Hampton.</p> <p>The outcome of the Research on Gypsies and Travellers (2016) suggests that there is no demonstrated need for additional pitches, nor any signals indicating unmet need arising from elsewhere in the borough.</p> <p>In addition to effective engagement and consultation undertaken with existing Travellers on the site in Hampton, the Local Plan database also includes the London Gypsy and Traveller Unit, the National Federation of Gypsy Liaison Groups as well as the</p>

Policy Expectations	Possible Evidence	Evidence Provided
		Friends, Families and Travellers service. No comments were received on the Publication Local Plan from gypsies, travellers or their representatives or groups.
Policy B: Planning for traveller sites (paras 7-11)		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> • Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. • An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. • Policy which takes into account criteria a-h of para 11 	<p>The Council did not identify a need for further pitches as part of the Research on Gypsies and Travellers (2016), and policy LP 37 seeks to protect the existing Traveller site in the borough, which contains 12 pitches.</p>
Policy C: Sites in rural areas and the countryside (para 12)		
<p>When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the</p>		Not applicable

Policy Expectations	Possible Evidence	Evidence Provided
nearest settled community.		
Policy D: Rural exception sites (para 13)		
If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.	<ul style="list-style-type: none"> If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity. 	Not applicable
Policy E: Traveller sites in Green Belt (paras 14-15)		
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>	<ul style="list-style-type: none"> Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process. 	Not applicable as the existing Traveller site is not located in Green Belt.
Policy F: Mixed planning use traveller sites (paras 16-18)		
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	<ul style="list-style-type: none"> Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or 	Not applicable

Policy Expectations	Possible Evidence	Evidence Provided
	separate sites in close proximity to one another. • N.B. Mixed use should not be permitted on rural exception sites	
Policy G: Major development projects (para 19)		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	• Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community.	Not applicable