

# Local Plan – Consultation on Proposed Main Modifications

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Planning

*22 December 2017 to 2 February 2018*

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## Local Plan – Consultation on Proposed Main Modifications

The Publication Local Plan was submitted to the Secretary of State on 19 May 2017. Following the Hearing Sessions as part of the Examination in Public during September and October, the Planning Inspector, Andrew Seaman BA (Hons) MA MRTPI, has proposed a list of Main Modifications to the Plan. The proposed Main Modifications have been subject to Sustainability Appraisal and an Addendum report to the Sustainability Appraisal has been produced. These are subject to consultation from **22 December 2017 to 2 February 2018**.

This consultation is only on the proposed Main Modifications and not other aspects of the Plan. Main Modifications are those which the Inspector considers are necessary to make the plan sound and/or legally compliant. Main Modifications are proposed without prejudice to the Inspector's final conclusion on the Local Plan which will take account of all representations submitted in response to this consultation.

This consultation is not an opportunity to raise matters relating to other parts of the submitted Local Plan that have already been considered by the Inspector during the Examination process and/or hearing sessions. Any representations received not relating to the Main Modifications will not be forwarded to the Inspector as he will only consider representations from this consultation which relate to the Main Modifications.

Copies of the proposed Main Modifications, and the Addendum to the Sustainability Appraisal, are available as follows:

- On the Council's website at [www.richmond.gov.uk/local\\_plan\\_examination](http://www.richmond.gov.uk/local_plan_examination)
- In the Borough's main libraries
- At the Civic Centre reception, 44 York Street, Twickenham, TW1 3BZ

If you wish to make representations on the above Main Modifications only, please send us your response by 5pm on 2 February 2018.

You can respond either:

- by email to **LocalPlan@richmond.gov.uk**
- by post to Policy and Design, LB Richmond upon Thames, Civic Centre, 44 York Street, Twickenham, Middlesex TW1 3BZ.

Please note that your response will not be treated as confidential. If you have any queries, please email [LocalPlan@richmond.gov.uk](mailto:LocalPlan@richmond.gov.uk) or phone 020 8891 1411.

Responses to the Main Modifications will be forwarded to the Inspector, who will take them into account before issuing his report. The general expectation is that issues raised on the consultation of the Main Modifications will be considered through the written representations process. If the Inspector finds the Plan sound, the Council will adopt it later in 2018. Further information about the Local Plan and Examination are on the website at [www.richmond.gov.uk/local\\_plan\\_examination](http://www.richmond.gov.uk/local_plan_examination)

## Richmond Upon Thames Local Plan MM Schedule

### Schedule of proposed Main Modifications to the LB Richmond Upon Thames Local Plan

The modifications below are expressed in the conventional form of strikethrough for deletions and underlining for additions of text. MM changes are grouped where appropriate.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Policy Section or heading	Page / Paragraph	Proposed Change	Reason for the change
MM1 Neighbourhood Planning			
Introduction	p.4 paragraph 1.1.4	In the paragraph 1.1.4 of the Introduction, (Setting the Scene) amend the last sentence to read: “The Council will ensure that planning applications that accord with the policies in the adopted Local Plan and the London Plan (and where relevant, with policies in <u>emerging neighbourhood plans, such as</u> the Ham and Petersham Neighbourhood Plan once adopted) will be approved without delay, unless material considerations indicate otherwise.”	For clarification and consistency with national policy.
Strategic Context	p.10-11	New paragraph and sub-heading after 2.1.11 and before “Village Planning” “ <u>Neighbourhood Planning</u> <u>Neighbourhood Planning was introduced by the Localism Act 2011. It allows communities to influence the future of their local areas by preparing a Neighbourhood Development Plan for the area. Neighbourhood plans are led and written by the community, not the Council, and they have to be in general conformity with the strategic policies in the relevant local, regional and national planning policy documents and guidance. A neighbourhood plan that is prepared in line with the legal requirements and supported by a majority in a local referendum must be adopted by the Council. When adopted, a neighbourhood plan becomes part of the statutory development plan and will be taken into account alongside the</u> ”	To provide clarity on Neighbourhood Planning and Village Plan process and SPDs.

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	paragraph 3.1.4	<p><u>Council's other plans when making decisions on planning applications in that area. In this borough, the Ham and Petersham Neighbourhood Forum is preparing a Neighbourhood Plan for its area."</u></p> <p>3.1.4 The Spatial Strategy reinforces the borough's context as an outer London Borough that is characterised by a high quality natural, built and historic environment with highly valued open landscape, parks, green spaces and opportunities for sport, recreation, culture and tourism. The overarching principles are to protect the unique local character (as set out in the Village Planning Guidance SPDs and in <u>neighbourhood plans, such as in the emerging Ham and Petersham Neighbourhood Plan</u>), maintain and enhance our open spaces as well as our heritage, achieve high levels of sustainability and ensure all communities have access to housing, employment opportunities, services and facilities.</p>	
Local Character and Design Quality	p.28 Policy LP1	<p>Amend the last paragraph of part A. of the policy LP1 to read:</p> <p>"All proposals, including extensions, alterations and shop fronts, will be assessed against <u>the policies contained within a neighbourhood plan where applicable, and</u> the advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design."</p>	For clarification and consistency with national policy.
MM2 Heritage Matters			
Strategic Vision	p.12 paragraph: 2.2.1	<p>Section 1 of the Local Plan Strategic Vision (Page 12, paragraph 2.2.1) to read as follows:</p> <p><u>"Heritage assets including listed buildings and Conservation</u></p>	The change will establish the important role that heritage assets play in defining the character of the borough and

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		Areas , <u>historic parks</u> , as well as Royal Botanic Gardens, Kew World Heritage Site ..."	ensure that this is captured within the Strategic Vision, as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
Local Character and Design Quality	p.28 Policy LP 1	Change last sentence of LP 1 Part B as follows: "In sensitive areas, <u>such as Conversation Areas and relevant Character Areas as identified in the Village Planning Guidance SPDs</u> , rigid and gloss finish blinds will generally be unacceptable."	To clarify reference to sensitive areas.
Designated Heritage Assets	p.33 Policy LP 3	Paragraph A. "The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. <u>Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal.</u> The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, Listed Buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens will be conserved and enhanced by the following means:"	As set out in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
Designated Heritage Assets	p.33 Policy LP 3	<i>Point 2.</i> "Consent for demolition of Grade II Listed Buildings will only be granted in exceptional circumstances and for Grade II* and Grade I Listed Buildings in wholly exceptional circumstances following a thorough assessment of <del>their</del> <u>the justification for the proposal and the significance of the asset.</u> "	To reflect paras 132 and 133 of the NPPF
Designated Heritage Assets	p.34 Policy LP 3	Insert 2 further points under Section A of Policy LP 3 <u>"8. Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.</u> <u>9. Protect Scheduled Ancient Monuments, including their</u>	As agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).

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		<u>settings, by ensuring proposals do not have an adverse impact on their significance."</u>	
Designated Heritage Assets	p.34 Policy LP 3	Amend criterion agreed as part of Statement of Common Ground as follows and update previous change in row above (formerly referred to as PE/LP3/3): <del>"9. Protect Scheduled Ancient Monuments, including their settings, by ensuring proposals do not have an adverse impact on their significance."</del>	As agreed with Historic England.
Designated Heritage Assets	p.33 Policy LP 3  Paragraph 4.3.9	Minor amendments to Part A as follows:  "3. Resist the change of use of <del>L</del> isted <del>B</del> uildings where <u>their significance would be harmed</u> <del>this would materially harm their character and distinctiveness</del> , particularly where the current use contributes to the character of the surrounding area and to its sense of place.  Amend the first sentence of paragraph 4.3.9 of the supporting text as follows:  4.3.9 Listed <del>B</del> uildings are best used for their original purpose and therefore the Council will resist the change of use of a <del>L</del> isted <del>B</del> uilding where this would <del>materially</del> harm its <u>significance in relation to heritage interest and character and distinctiveness. ...."</u>	As agreed with Historic England.
Non-Designated Heritage Assets	p.36 Policy LP 4	Move the following policy text into the supporting text at a new paragraph after paragraph 4.4.3:  "4.4.4 Applicants will be required to:  1) retain the character of Buildings of Townscape Merit, war memorials and any other non-designated heritage assets;	To take a consistent approach in LP3 and LP4.

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		<p>2) submit a Heritage Statement to assess the potential harm to, or loss of, the significance of the non-designated heritage asset, including from both direct and indirect effects;</p> <p>3) describe the significance of the non-designated heritage asset affected, including any contribution made by their setting; the extent of the relevant setting will be proportionate to the significance of the asset. Appropriate expertise should be used to assess a non-designated heritage asset; and</p> <p>4) retain or restore the structures, features and materials of the asset, which contribute to its architectural integrity and historic interest. "</p>	
Views and Vistas	p.37 Policy LP 5	<p>In criterion 5., change as follows:</p> <p><del>"Seek</del> improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured <del>will be encouraged where appropriate."</del></p> <p>Amend criterion 6. c. of policy LP 5 as follows:  <u>"are affected by development on sites within the setting of, or adjacent to, conservation areas and listed buildings."</u>  <del>"affect the setting of and from development on sites adjacent to Conservation Areas and Listed Buildings."</del></p>	As agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
MM3 Housing			
New Housing	p.118 LP 34 Paragraph 9.1.4	<p>Amend para as follows:            This is reflected in the broad expected pattern of future housing land supply set out in <del>the policy LP34.B which sets out indicative ranges for the broad areas and are not to be regarded as any lower or upper limit, as the overall target is to be exceeded.</del></p>	To clarify that the approx. no. of units set out for the broad areas in LP34.B does not set any upper limit.
	9.1.1	<p>Add to para as follows:  <u>The Council will, as necessary, undertake a full or partial review</u></p>	To clarify the approach to future circumstances.

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		<p><u>of the Local Plan in light of the content of any new adopted London Plan which will include an assessment of its identified constraints and opportunities affecting housing delivery.</u></p>	
Housing Mix and Standards	p.119 LP 35 Paragraph 9.2.2	<p>Amend the last sentence in Part A to read: ... The housing mix should be appropriate to the <u>site-specifics of the location</u>.</p> <p>Amend the last sentence in paragraph 9.2.2 to read: ... <u>To accord with LP35.A</u> the appropriate mix should be considered on a site by site basis having regard to...</p>	To clarify the assessment of housing mix is considered on a site by site basis, and signpost this sentence in the supporting text which provides clarification on the assessment of mix to the location.
Housing Mix and Standards	LP 35	<p>Amend Part C: C. All new housing development, including conversions, <del>are required to comply with the Council's</del> <u>should provide adequate external space standards. For houses a minimum total private space of 70sqm for 3 or more beds and 40sqm for 2 beds should be provided. To provide adequate private amenity space for flats, a minimum of 5sqm of private outdoor space for 1-2 person dwellings should be provided and an extra 1sqm should be provided for each additional occupant.</u> Purpose built, well designed and positioned balconies or terraces are encouraged where new residential units are on upper floors, if they comply with policy LP8 Amenity and Living Conditions. <u>Regard should be had to the Council's Residential Development Standards SPD as appropriate.</u></p>	To ensure flexibility in implementation.
Affordable Housing	p.121 LP 36	<p>Amend Part A.a to read: a) 50% of all housing units will be affordable housing, <del>with this</del> <u>50% will comprise</u> a tenure mix of 40% of the affordable housing for rent and 10% <u>of the affordable</u> intermediate housing.</p>	To provide clarity to LP36 A.a additional wording to specify the application of the tenure split.
Affordable	p.123	Amend Part B to read:	To provide distinction in

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Housing	LP 36 Paragraph 9.3.2	<p>B. A contribution towards affordable housing will be expected on all housing sites. <u>The following requirements apply:</u></p> <p>a) <u>on all former employment sites at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.</u></p> <p>b) <u>on all other sites capable of ten or more units gross and all former employment sites, at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.</u></p> <p>c) <del>bc.</del> <u>on sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out below and in the Affordable Housing SPD.</u></p> <p>Amend fourth sentence in paragraph 9.3.2 to read: <u>A flowchart to follow, setting out the policy requirements and the mechanism for assessing the contributions from individual sites, is set out in the Affordable Housing SPD</u></p>	BP36.B.a of the exact percentage sites are expected to deliver and requirements for on-site provision, along with a reference to the flowchart in the Affordable Housing SPD at paragraph 9.3.2.
Affordable Housing	p.122 LP 36	<p>Amend Part C to read: C. <u>In accordance with A and B, the Council will seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes.</u></p> <p>Amend Part D to read: D. <u>Where a reduction to an affordable housing contribution is sought from the requirements in A and B on economic viability grounds</u></p>	To demonstrate that C is offering additional guidance to assist in the implementation of Parts A and B and does not set any different policy requirement, and when D would apply. This is in accordance with London Plan Policy 3.12.
Infill, Backland and Backgarden	p.129 LP 39	Amend Part A criteria (10) to read: 10. <u>Result in no unacceptable adverse impact on neighbours in</u>	To clarify how Part B is applied on backgarden developments

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Development		<p>terms of visual impact, noise or light from vehicular access or car parking.</p> <p>Amend Part B third sentence to read:            In <del>exceptional</del> <u>some</u> cases <del>where it is considered that</del> a limited scale of back garden development may be <u>considered</u> acceptable <del>it should not have a significantly adverse impact upon if it complies with</del> the factors set out <u>in A</u> above.            Development on back garden sites must be more intimate in scale and lower than frontage properties.</p>	(along with Part A) and the potential impacts assessed.
MM4 Building Heights			
Building Heights	p.31 Policy LP 2	<p>Amend as follows:            "The Council will require new buildings, <u>including extensions and redevelopment of existing buildings</u>, to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights, by the following means..."</p>	To clarify that that if a redevelopment were proposed, improvements to the existing architectural design quality would be sought, as well as public realm benefits and the impact on the character and quality of the area would be assessed.
Building Heights	p.31 Policy LP 2	<p>Amend criterion 1 as follows:</p> <p>1. require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; <u>proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and</u></p>	To clarify relationship between criteria 1 and 6.

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		<p><u>quality of the area:</u></p> <p>Delete criterion 6:                      5. refrain from using height to express and create local landmarks; <u>and</u>  <del>6. resist buildings that are taller than the surrounding townscape other than in exceptional circumstances, such as where the development is of high architectural design quality and standards, delivers public realm benefits and has a wholly positive impact on the character and quality of the area; and</del>  <del>7-6.</del> require full planning applications for any building that exceeds the prevailing building height within the wider context and setting.</p>	
MM5 Amenity			
Amenity and Living Conditions	P41. Policy LP 8	<p>Delete the following text from policy:  <del>ensure there is a minimum distance of 20 metres between main facing windows of habitable rooms (this includes living rooms, bedrooms and kitchens with a floor area of 13sqm or more) to preserve the privacy of existing properties affected by the new development;</del></p>	To ensure flexibility and effectiveness.
Amenity and Living Conditions	p.41 Policy LP 8	<p>Replace "<del>expected to comply with...</del>" with "<u>expected to have regard to the guidance set out within</u> the Council's..."</p>	To indicate appropriately advice and guidance set out in SPD, as envisaged by national policy
Amenity and Living Conditions	p.42 Paragraph 4.8.8	<p>Amend paragraph 4.8.8 to read:</p>	To clarify the references to minimum distances are a

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		<p>Whilst there will be some impact from any new development, the test is one of harm in relation to the impact on habitable rooms, which includes all separate living rooms and bedrooms, plus kitchens with a floor area of 13sqm or more. The minimum distance <u>guideline</u> of 20 metres between habitable rooms within residential development is for privacy reasons; a greater distance may be required for other reasons, or a lesser distance may be acceptable in some circumstances. <u>These numerical guidelines should be assessed on a case by case basis, since privacy is only one of many factors in site layout design; where the established pattern of development in the area (layout and height) may favour lesser distances.</u> The distance of 20 metres is generally accepted as the distance that will not result in unreasonable overlooking. Where principal windows face a wall that contains no windows or those that are occluded (e.g. bathrooms), separation distances can be reduced to 13.5 metres. <u>Where the impact of a building is on another within the same development site, measures can also be applied to minimise overlooking, such as splays, angles of buildings, obscure glazing etc. A Supporting Planning Statement should set out justification for a reduction in these distances.</u></p>	<p>reasonable starting point in the borough context, to provide clear guidance for developers and existing occupants, while recognising an assessment will be made on a case by case basis.</p>
MM6 Environmental Matters			
Local Environmental Impacts, Pollution & Land Contamination	p. 44 Policy LP 10	<p>Delete 'where practicable' from LP 10, Part B, and insert 'secure at least':</p> <p>"Developers should <del>commit to secure at least</del> 'Emissions Neutral' development <del>where practicable.</del>"</p>	<p>To bring the policy requirement in line with Policy 7.14 of the London Plan, which states that development proposals should "be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality...".</p>

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Local Environmental Impacts, Pollution and Land Contamination	p.45 Paragraph 4.10.5	Insert within paragraph 4.10.5 the following:  "The whole of the borough has been declared as an Air Quality Management Area (AQMA) and as such any new development and its impact upon air quality must be considered very carefully. <u>Strict mitigation will be required for any developments proposed within or adjacent to 'Air Quality Focus Areas'. An 'Air Quality Focus Area' is a location that has been identified as having high levels of pollution (i.e. exceeding the EU annual mean limit value for nitrogen dioxide) and human exposure. Air Quality Focus Areas are designated by the Greater London Authority.</u> The Council will consider the impact of introducing new developments to areas already subject to poor air quality, and the impact on the new occupiers of that development, especially in sensitive uses such as schools."	To ensure that the Air Quality Focus Areas, as designated by the Greater London Authority, and updated on a regular basis, are referred to within the supporting text.
Local Environmental Impacts, Pollution and Land Contamination	p.45 Policy LP 10	Amend last sentence of LP 10 as follows:  <u>Where applicable and considered necessary, the Council will may seek a bespoke charge specific to the proposal to cover the cost of monitoring the CMS; a discount may be applied if the applicant/developer uses the Council's Building Control services.</u>	To ensure that monitoring fees are specific to a proposal and in line with CIL regulations.
MM7 Green Infrastructure			
Green Infrastructure	p.52 paragraph 5.1.1	Add a cross reference to Chapter 4 after the 2 <sup>nd</sup> sentence of paragraph 5.1.1 as follows:  <u>"The need to protect the historic significance of the borough's exceptional landscapes is set out in Chapter 4: Local Character and Design."</u>	As agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
Green Infrastructure	p.55 Policy LP 13	Omit the criteria of Part B of LP 13.	To clarify the policy and to ensure consistency with national

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		<p>B. It will be recognised that there may be exceptional cases where inappropriate development, such as small scale structures <u>for essential utility infrastructure</u>, may be acceptable, <del>but only if it:</del></p> <p><del>1. Does not harm the character and openness of the Green Belt or Metropolitan Open Land;</del></p> <p><del>and</del></p> <p><del>2. Is linked to the functional use of the Green Belt or Metropolitan Open Land, or supports outdoor open space uses;</del></p> <p><del>or</del></p> <p><del>3. Is for essential utility infrastructure and facilities for which it needs to be demonstrated that no alternative locations are available and that they do not have any adverse impacts on the character and openness of the Green Belt or Metropolitan Open Land.</del></p> <p>Amend supporting text as required at para 5.2.4</p>	policy
	<p>P 56 Para 5.2.8</p> <p>5.2.10</p>	<p>Amend para to read:</p> <p>5.2.8 Local Green Space, <u>as to be</u> identified on the Proposals Map, is green or open space which has been demonstrated to have special qualities and hold particular significance and value to the local community which it serves. <u>New areas of Local Green Space designation can only be identified when a plan is being prepared or reviewed.</u></p> <p><u>Delete last three bullet points of para 5.2.10</u></p>	To ensure clarity and effectiveness consistent with national policy.
MM 8 Open Space			
Other Open Land of Townscape	p.57 Paragraph 5.3.1	<p>Amend paragraph 5.3.1 as follows:</p> <p>"The purpose of this policy is to safeguard open land of local</p>	To confirm the process for new OOLTI designations is through the Local Plan process.

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Importance		importance and ensure that it is not lost to other uses without good cause. Areas designated as Other Open Land of Townscape Importance (OOLTI) form an important part of the multi-functional network of Green Infrastructure and they can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. <u>New areas for OOLTI designation can only be identified when a plan is being prepared or reviewed.</u> The <u>existing</u> designated areas are shown on the <u>Proposals Policies</u> Map."	
Other Open Land of Townscape Importance	p.57 Paragraphs 5.3.3 and 5.3.5	Delete paragraphs 5.3.3 and 5.3.5 of the supporting text of the OOLTI policy as follows: <del>5.3.3 This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value, and therefore merit protection.</del> <del>5.3.5 This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value, and therefore merit protection.</del>	To confirm the process for new OOLTI designations is through the Local Plan process.
Other Open Land of Townscape Importance	p.57 Paragraph 5.3.4	Add to the last bullet point the following: Value for biodiversity and nature conservation <u>and meets one of the above criteria.</u>	To clarify the criteria in relation to biodiversity and nature conservation is not a sole criterion in defining OOLTI.
MM9 River Corridors			
River Corridors	p.64 Policy LP 18	The following change is proposed to LP18:  - Public Access C. c. to read as follows: "Provide new public access to the riverside <del>and the foreshore</del> where possible, <u>and maintain existing points of access to the foreshore subject to health and safety considerations.</u> There is an expectation that all major development proposals adjacent to the borough's rivers	To address the PLA's concern in relation to safety, as agreed in Statement of Common Ground with Port of London Authority (31 August 2017) (LBR-LP-007).

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		shall provide public access to the riverside <del>and foreshore.</del> "	
River Corridors	p.64 Policy LP 18	The Council to consider adding a new criterion C.d. to read as follows: " <u>Provide riparian life-saving equipment where required and necessary.</u> "	To address the PLA's concern in relation to safety, as agreed in Statement of Common Ground with Port of London Authority (31 August 2017) (LBR-LP-007).
MM10 Climate Change			
Flood Risk and Sustainable Drainage	p.73 Policy LP21	Section B Basements and subterranean developments, 2 <sup>nd</sup> row of table  "In areas of Extreme, Significant and Moderate Breach Hazard (as set out in the Council's SFRA): New basements: restricted to Less Vulnerable / Water Compatible use only." add after – " 'More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed. <u>Bedrooms at basement level will not be permitted.</u> " - add after "'Highly Vulnerable' <u>such as self-contained basements/bedrooms</u> uses will not be permitted."	To ensure the policy clearly reflects the evidence and recommendations as set out in the Council's SFRA and/or in national planning policy and guidance.
Flood Risk and Sustainable Drainage	P.73 Policy LP21	Section B. Basements and subterranean developments, 2 <sup>nd</sup> row of table, amend as follows: "In areas of Low or No breach Hazard (as set out in the Council's SFRA): New basements: if the Exception Test ( <u>where applicable</u> ) is passed, basements may be permitted for residential use where they are <u>not</u> self-contained or used for bedrooms.	To ensure the policy clearly reflects the evidence and recommendations as set out in the Council's SFRA and/or in national planning policy and guidance
Flood Risk and Sustainable	p.73 Policy LP21	Section B. Basements and subterranean developments , 3 <sup>rd</sup> row of table concerning Flood Zone 2, amend as follows:	For clarity and to reflect national policy guidance.

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Drainage		New basements: if the Exception Test ( <u>where applicable</u> ) is passed, basements may be permitted for residential use where they are <u>not</u> self-contained or used for bedrooms.	
Flood Risk and Sustainable Drainage	p.75 Flood Risk Assessments paragraph: 6.2.8	Add after paragraph 6.2.8: <u>"All new development needs to take account of the latest climate change allowances. This should be included as part of the Flood Risk Assessment process. This will help minimise vulnerability and provide resilience to flooding in the future."</u>	To ensure the policy clearly reflects the evidence and recommendations as set out in the Council's SFRA and/or in national planning policy and guidance.
Flood Risk and Sustainable Drainage	p.72 Policy LP 21	Amend second paragraph of LP 21 as follows:  In <u>Flood Zones 2 and 3</u> <del>areas at risk of flooding</del> , all proposals on sites of 10 dwellings or more or 1000sqm of non-residential development or more, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted."	To clarify that this requirement applies in Flood Zones 2 and 3.
MM11 Sustainable design and construction			
Sustainable design and construction	p.78 Policy LP22	Replace " <del>to comply with...</del> " with "to complete..." in Policy LP 22 Part A. point 1 to read: "Development of 1 dwelling unit or more, or 100sqm or more of non-residential floor space (including extensions) will be required <del>to comply with</del> <u>to complete</u> the Sustainable Construction Checklist SPD. A completed Checklist has to be submitted as part of the planning application.	For clarity and to reflect S38(6) of the Town and Country Planning Act 1990 (as amended)
Sustainable design and construction	p.79 Policy LP22	Replace " <del>to comply with...</del> " with " <u>to complete and submit...</u> " in Policy LP 22 Part E. 2 <sup>nd</sup> sentence to read: "Householder extensions and other development proposals that do not meet the thresholds set out in this policy are encouraged <del>to</del>	For clarity and to reflect S38(6) of the Town and Country Planning Act 1990 (as amended)

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		<del>comply with</del> <u>to complete and submit</u> the Sustainable Construction Checklist SPD as far as possible, and opportunities for micro-generation of renewable energy will be supported in line with other policies in this Plan."	
Sustainable design and construction	p.79 Policy LP22	Amend Part B criterion 3 to read: 3. All <del>major</del> non-residential buildings <u>over 100sqm</u> should achieve a 35% reduction. From 2019 all major non-residential buildings should achieve zero carbon standards in line with London Plan policy.	For clarity and consistency, to reflect the requirements set out in the table of paragraph 6.3.24.
MM12 Waste Management			
Waste management	p.85 Policy LP 24	Amend Policy LP24 point 1 as follows: "All developments, including conversions and changes of use are required to provide adequate refuse and recycling storage space and facilities, which allows for ease of collection and which residents and occupiers can easily access, in line with the <u>guidance and advice set out in</u> the Council's SPD on Refuse and Recycling Storage Requirements."	For clarity and to reflect S38(6) of the Town and Country Planning Act 1990 (as amended).
Waste management	p.86 Paragraph 6.5.3	Amend paragraph 6.5.3 to read: "This policy ensures that all development proposals provide adequate refuse and recycling storage space and facilities to serve new developments, in line with <u>the guidance and advice set out in</u> the Council's SPD on Refuse and Recycling Storage Requirements.	For clarity and to reflect S38(6) of the Town and Country Planning Act 1990 (as amended)
Waste management	p.86	Add new paragraph after paragraph 6.5.6 as follows: <u>The existing waste management sites as set out in Appendix 2 of the West London Waste Plan were identified at a snapshot in time. This list can be revised. New waste sites, permissions and licences may be granted by the Council or Environment Agency. The Council carries out regular monitoring of existing waste sites, the results of which, including maps of operational sites,</u>	To clarify the approach to existing waste sites.  As existing operations may cease and new waste sites may be permitted, it has been agreed with the other WLWP authorities

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Policy Section or heading	Page / Paragraph	Proposed Change	Reason for the change
		<p><u>are published as part of the Authority's Monitoring Report.</u></p>	<p>to include updates to existing waste management sites within the Authority's Monitoring Report (AMR), which is available at <a href="https://www.richmond.gov.uk/authority_monitoring_report">https://www.richmond.gov.uk/authority_monitoring_report</a>, and which identifies on a regular basis if any site is no longer in operational use for waste management purposes. In addition, the AMR includes maps to clarify the current extent of each operational site where this is known.</p>
MM13 Borough Centres			
Development in Centres	p.88 LP 25	<p>Add comma to LP 25.A.3 to read: .... For retail developments, including extensions, of over 500sqm gross, the Council will require a Retail Impact Assessment. ...</p>	<p>To clarify that all developments over 500sqm will need a RIA, not just extensions.</p>
Retail	<p>p.97 Policy LP 26 F</p> <p>p.99 Policy LP 27 A.3</p> <p>Policy LP 27 B</p>	<p>F. Where a proposal involves a change of use not supported by policy, the Council will require satisfactory evidence of full and proper marketing of the site <del>for at least 2 years</del>. The applicant will <u>be expected</u> <del>need</del> to undertake marketing in line with the requirements set out in Appendix 5.</p> <p>3. The Council will require satisfactory evidence of full and proper marketing <del>for a minimum of 2 years</del> where a proposal does not meet the above criteria. The applicant will <u>be expected</u> <del>need</del> to undertake marketing in line with the requirements set out in Appendix 5.</p> <p>B. The Council will resist the loss of public houses. Before</p>	<p>To ensure effective implementation.</p>

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Policy Section or heading	Page / Paragraph	Proposed Change	Reason for the change
		accepting the loss of any public house the Council requires satisfactory evidence of full and proper marketing normally for at least 2 years for a full range of appropriate uses (see policy LP 28 Social Infrastructure). The applicant will <u>be expected need</u> to undertake marketing in line with the requirements set out in Appendix 5.	
MM14 Community Facilities			
Social and Community Infrastructure	p. 104	<p>Add a new paragraph after 8.1.8 to read:  <u>The Council's Indoor Sports Facility Needs Assessment highlights the need for new facilities within the borough. Where possible and feasible, such provision should be provided on-site in line with the Council's Indoor Sports Facility Needs Assessment.</u></p> <p>Add a new paragraph after 8.1.10 to read:  <u>Proposals that could result in the loss of an existing indoor sport facility will also be assessed against the Council's Indoor Sports Facility Needs Assessment and the criteria as set out in the NPPF. Early engagement with Sport England is encouraged where a proposal affects an existing indoor sport facility.</u></p>	To address Sport England's comments to deal specifically with new indoor sports facilities and the Needs Assessment, and specifically with the potential loss of such facilities.
MM15 Education and Training			
Education and Training – Local Employment Agreements	p.107 LP 29 Paragraph 8.2.14	Add after first sentence: <u>... Securing the skills to support residents into sustainable employment is a key priority for the Council to support the local economy, to raise the bar further for those with higher levels of skills than London averages and make sure some residents with lower skills are not missing out economically. ...</u>	To clarify the requirement for LEAs is considered necessary, directly related, and fairly related in scale and kind to the development. A LEA provides the means to manage the development related job opportunities arising from the proposal, and will cover how the

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Policy Section or heading	Page / Paragraph	Proposed Change	Reason for the change
			applicant will work with the Council in order to maximise employment and training opportunities for local people and businesses.
Education and Training – Local Employment Agreements	p.107 LP 29 Paragraph 8.2.15	<p>Add to end of paragraph 8.2.15:  <u>... Such an agreement can make use of existing schemes, such as Way2Work, Construction Training Initiative, schemes run by Registered Providers and developers, provided these manage the development related job opportunities.</u></p> <p><u>The details of the LEA will be subject to negotiation, tailored to site specific circumstances and proportionate to the scale of development proposed, and require developers to use reasonable endeavours to incorporate in their relevant contracts. The contents are expected to cover:</u></p> <ul style="list-style-type: none"> <li>• <u>Forecasting of job opportunities</u></li> <li>• <u>Notification of job vacancies</u></li> <li>• <u>Local labour target</u></li> <li>• <u>Jobs brokerage and skills training</u></li> <li>• <u>Apprenticeships and work experience</u></li> <li>• <u>Use of local suppliers</u></li> <li>• <u>Delivery of specific LEA targets.</u></li> </ul> <p><u>A developer can set out justification as to why it may not be possible to deliver any of the requirements highlighted. Further guidance to assist implementation will be provided in a forthcoming SPD.</u></p>	To guide the practicalities for implementation of the requirement for LEAs, ahead of further SPG guidance.
MM16 Health and Well Being			
Social and Community	p.104 LP 28 Paragraph	Amend paragraph 8.1.10 point (1): ... Where the application relates to the loss of a health	To clarify clearly that Policies LP28 and LP30 will be

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Policy Section or heading	Page / Paragraph	Proposed Change	Reason for the change
Infrastructure and Health and Wellbeing	8.1.10  p.111 LP 30 Paragraph 8.3.17	<p>facility, <u>the requirements of LP 30 will also need to be addressed and</u> written agreement from the Richmond Clinical Commissioning Group, NHS England or other relevant health body must be provided...</p> <p>Add to end of paragraph 8.3.17 to read:            .... Applications for new or loss of health and social care facilities will be considered in line with the criteria of policy LP 28 in 8.1 'Social and Community Infrastructure' <u>and paragraph 8.1.10 sets out that written agreement of the relevant health body must be provided to assess the loss of any existing health facilities.</u></p>	considered for proposals involving the loss of any health facilities.
Health and Wellbeing	p.108 Policy LP30	add new point 7. within main policy section A under point 6. to read as follows: " <u>7. Active Design which encourages wellbeing and greater physical movement as part of everyday routines.</u> "	To be consistent with the health and wellbeing objectives of the NPPF
Health and Wellbeing	p.108 Policy LP 30  8.3.13/14/15	<p>Amend LP 30 B. bullet point 2:</p> <p>The Council will <u>manage</u> <del>refuse</del> proposals for new fast food takeaways (A5 uses) located within 400 metres of the boundaries of a primary or secondary school in order to <u>promote the availability of healthy</u> <del>restrict the availability of unhealthy</del> foods.</p> <p>Amend para 8.3.13/14/15</p> <p>8.3.13 There is an emerging obesity issue in the borough, particularly in children. <del>One established method of addressing obesity is by restricting access to unhealthy foods, particularly fast food takeaways.</del> Childhood obesity amongst school age children is a concern as evidence suggests that obese children are more likely to be obese adults and are at an increased risk of developing</p>	To clarify the objectives of the Council and to be justified with regard to the available evidence

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	7.2.10	<p>further health difficulties. Access to fast food takeaways <del>detracts from</del> <u>can influence</u> the ability of individuals to adopt healthy lifestyles and <u>have the potential to undermine</u> <del>undermines</del> healthy eating initiatives that may be in place at the school. Therefore this policy focuses particularly on <u>managing</u> <del>restricting</del> access to fast food takeaways in close proximity to schools.</p> <p>8.3.14 The Council will <del>refuse</del> <u>consider</u> proposals for fast food takeaways located within 400 metres of the boundaries of a primary or secondary school <u>with regard to the nature of the proposal, its contribution to healthy food availability and its relationship to the existing provision of A5 outlets.</u> 400m is a 5-10 minute walk and it is suggested that this is the maximum distance that students would walk to and back from in their lunch break. Outside of these 400m '<u>restriction management</u>' zones, applications for fast food takeaways will be considered in line with other policies in <del>this</del> <u>the development</u> plan.</p> <p>8.3.15 The following map shows the existing schools within the borough (as of May 2016) and the associated 400 metre buffer area, which are the '<u>restriction management</u>' zones for fast food takeaways:</p> <p>[Map]</p> <p>Amend para 7.2.10 In addition to the areas to subject to restrictions listed in the table on 'Use Class to be restricted' as set out in the policy above, the Council will <u>manage</u> <del>not permit development of</del> new fast food takeaways (A5 uses) located within 400 metres of the boundaries of a primary or secondary school. This is in order to <del>restrict</del> <u>support</u></p>	

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Policy Section or heading	Page / Paragraph	Proposed Change	Reason for the change
		<del>the promotion</del> the availability of unhealthy foods to school-age children...	
MM17 Open Space and Recreation			
Public Open Space, Play Space, Sport and Recreation	p. 111 Policy LP31	Amend first sentence of Part B as follows: "B. The Council will require all major development proposals in the borough to meet the Public Open Space, <del>and</del> play space, <u>and playing fields and ancillary sport facilities</u> needs arising out of the development by requiring the following:"	To ensure the needs as set out in the borough's Playing Pitch Strategy are addressed as agreed in Statement of Common Ground with Sport England (21 September 2017) (LBR-LP-024).
Public Open Space, Play Space, Sport and Recreation	p. 111 Policy LP31	Add new criterion 3 of Part B as follows:  <u>"3. Playing fields and sport facilities: Applicants should assess the need and feasibility for on-site provision of new playing fields and ancillary sport facilities in line with the borough's Playing Pitch Strategy."</u>	To ensure the needs as set out in the borough's Playing Pitch Strategy are addressed as agreed in Statement of Common Ground with Sport England (21 September 2017) (LBR-LP-024).
Public Open Space, Play Space, Sport and Recreation	p. 111 Policy LP31	Amend criterion 3 of Part B as follows:  <del>3-4.</del> Where on-site provision of Public Open Space, <del>or</del> play space <u>or new playing fields and ancillary facilities</u> is not feasible or practicable, the Council will expect existing surrounding facilities and spaces to be improved and made more accessible to the users and occupiers of the new development through, for example, improved walking and cycling links or enhancements of play space <u>or existing playing fields and associated sport facilities</u> . Financial contributions will be required to either fund off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development."	To ensure the needs as set out in the borough's Playing Pitch Strategy are addressed as agreed in Statement of Common Ground with Sport England (21 September 2017) (LBR-LP-024).
MM 18			

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Policy Section or heading	Page / Paragraph	Proposed Change	Reason for the change
Employment			
Employment and local economy	p.132 Policy LP 40	Rewording of criterion 4 to read as follows:  4. <u>In exceptional circumstances, Mixed use development proposals which come forward for specific employment sites</u> should retain, and where possible enhance, the level of existing employment floor space. The inclusion of residential use within mixed use schemes will not be appropriate where it would <del>be incompatible with, or adversely impact on,</del> the continued operation of other established employment uses within that site or on neighbouring sites.	To provide clarity that this relates to specific employment sites where under exceptional circumstances mixed use development may be required for viability purposes.
MM 19 Offices			
Offices	p.133 Policy LP 41	Amend 2b of Part A to read as follows:  2b) Mixed use including other employment generating or community uses. <del>Such sites should</del> <u>and residential which maximises</u> the amount of affordable housing provided as part of the mix; ....	To clarify the implementation in relation to mixed use development.
Offices	p.133 Policy LP 41	C. In the designated Key Office Areas, as shown on the <del>Proposed</del> Policies Map, net loss of office floorspace will not be permitted. Any development proposals for new employment or mixed use floorspace <del>should will be required to</del> contribute to a net increase in office floorspace <u>where feasible</u> . Criteria 1 and 2 in A (above) do not apply to the Key Office Areas areas.	To clarify for reasons of effectiveness.
Offices	p.134 Policy LP 41	Amend criterion 5 of Part D to read as follows: 5. The Council will require the provision of affordable office space within all major developments with over 1000sqm of office space; this will be secured through Planning Obligations <del>in line with the Planning Obligations SPD.</del>	For clarity and flexibility in effective implementation.
Offices	p.135 paragraph	Add a first sentence and amend the supporting text at paragraph 10.2.6 to read as follows:	To provide necessary clarity on low cost office space.

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Policy Section or heading	Page / Paragraph	Proposed Change	Reason for the change
	10.2.6	<p><u>"The types of office buildings most at risk from conversion have relatively small floorplates. In order to maximise the choice of resources and maintain a stock of cheaper accommodation lower cost office stock to provide cheaper accommodation to the borough's high percentage of Small and Medium Enterprises (SMEs), the Council seeks to discourage the unnecessary redevelopment of these premises. "</u></p>	
Offices	p.136 paragraph 10.2.12	<p>Amend from penultimate sentence of paragraph 10.2.12 onwards to read as follows:</p> <p><u>"... Affordable workspace is considered to have a rent and service charge of less than 80% of comparable local market rates. It is acknowledged that market rates will vary according to a range of factors such as location within the borough, the quality and type of office stock. Affordable office provision, including appropriate rental values, will be agreed and secured through Planning Obligations in line with the Council's Planning Obligations SPD. A revised Planning Obligations SPD will contain guidance to assist in the implementation of policy requirements on affordable employment space, including guidance on design and financial arrangements.</u></p>	To provide further necessary clarity on affordable workspace.
MM 20 Industrial Land			
Industrial Land and Business Parks	p.137 Policy LP 42	<p>Amend Part A criterion 2b to read:</p> <p>2b) Mixed use including other employment generating or community uses, <u>and residential providing it does not adversely impact on the other uses and maximises the amount of affordable housing delivered as part of the mix.</u></p>	To clarify the implementation in relation to mixed use development.
Industrial Land and Business	p. 138 Policy LP 42	Change wording in Part B criterion a to read:	To clarify the implementation in relation to mixed use

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Policy Section or heading	Page / Paragraph	Proposed Change	Reason for the change
Parks	10.3.8	<p>a) loss of industrial floorspace will be resisted unless <u>appropriate full, on-site</u> replacement floorspace is provided;</p> <p>Change wording in Part B criterion c to read:</p> <p>c) proposals for non-industrial uses will be resisted where the introduction of such uses would <del>have an adverse impact on the continued operation of the existing services</del> <u>impact unacceptably on industrial activities.</u></p> <p>Amend text to read:</p> <p>10.3.8 In the locally important industrial land and business parks loss of industrial space will be strongly resisted unless <u>appropriate full, on-site</u> replacement provision is provided. <u>Appropriateness will be determined with particular regard to site circumstances and the industrial/employment needs of the Borough.</u></p>	development.
Industrial Land and Business Parks	p. 138 Policy LP 42	<p>Amend Part C to read:</p> <p>New Industrial space</p> <p>c. Development of appropriate scale industrial uses, and improvement and expansion of such premises, is encouraged. New industrial space should be flexible and adaptable for different types of <del>uses</del> <u>activities</u> and suitable to meet future needs, especially to provide for the requirements of local businesses.</p>	For clarity and effectiveness
MM 21 Parking			
Parking Standards and	p. 147	Modifications to paragraph 11.2.3:	To clarify how the flexibility in the parking standards is being

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Policy Section or heading	Page / Paragraph	Proposed Change	Reason for the change
Servicing	Paragraph 11.2.3	<p>11.2.3 Developers may only provide fewer parking spaces, including car free schemes, if they can <del>show</del> <u>demonstrate as part of a Transport Statement or Transport Assessment with supporting survey information and technical assessment</u> that there would be no <u>unacceptable</u> adverse impact on <u>on-street parking availability</u>, amenity, street scene, road safety or emergency access in the <u>vicinity surrounding area, as a result of the generation of unacceptable overspill of on-street parking in the vicinity</u>. In general it is expected that in PTAL areas of <del>0-3</del> <del>4</del> <del>the standards should be met, but in</del> <u>In</u> PTAL areas of <del>5-4-6</del>, such as <del>Richmond and Twickenham centres</del>, parking provision at a level lower than the standard <del>or a car free development, supported for example by a car club</del>, may be appropriate <u>where this can be demonstrated as acceptable, taking account of local characteristics, availability of sustainable modes of travel and public transport provision, and availability of on-street parking spaces in exceptional circumstances</u>.</p>	applied.
Parking Standards and Servicing	p. 147 Paragraph 11.2.2	<p>Amend last paragraph of 11.2.2 as follows:            11.2.2 This restriction would be secured by <del>a Planning Obligation</del> <u>excluding the address from the schedule of streets in the relevant road traffic order that created or creates the Controlled Parking Zone in which the property is situated, by restricting under section 106 of the Town and Country Planning Act 1990 the disposal of an interest in relevant properties unless a person disposing advises the person acquiring of the non-availability of residents or business on-street parking permits and/or through Section 16 of the Greater London Council (General Powers) Act 1974 (or any statute revoking or re-enacting that Act)</u>.</p>	To clarify the legal mechanisms for securing a limitation of parking permits.
MM 22 Monitoring and Appendices			

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Policy Section or heading	Page / Paragraph	Proposed Change	Reason for the change
Implementation	p.199 13.5 Monitoring	<p>Add new paragraph following 13.5.6:</p> <p><u>It is recognised that over the lifetime of the Plan, external circumstances will change. Whilst the Plan is overall considered to be flexible, the NPPF allows for Local Plans to be reviewed in whole or in part to respond flexibly to changing circumstances. Therefore, external factors such as changes in national policy, a London Plan review or changes in local evidence and need may trigger a review of this Local Plan. The programme for the preparation of Development Plan Documents is set out within the Council's Local Development Scheme, which is regularly reviewed and updated.</u></p>	To clarify review in the Plan triggers and review mechanisms.
Implementation	p.197 Paragraph 13.3.5	<p>Amend paragraph 13.3.5:</p> <p>... It should be noted that Planning Obligation monies will not be secured for projects or items already on the Council's Regulation 123 List, and will be subject to the pooling restrictions as set out in the CIL regulations.</p>	To refer appropriately to the pooling restrictions for clarity.
Appendix 5 – Marketing Requirements	p.220 paragraph 18.0.2	<p>Amend paragraph 18.0.2 in Appendix 5 to read:</p> <p>This appendix sets out the details that should be provided to enable officers to assess the acceptability or otherwise of the marketing undertaken. <u>The Council's assessment will consider the overall length, type and quality of the marketing to come to a view, and if the applicant/agent puts forward any justification for any shortcomings in the marketing (e.g. the use of only one specialist website rather than a range of generic websites due to the nature of the existing employment use, or that a marketing board was not used because of advertisement controls) these will be considered, however the expectation is the below requirements should be fully addressed.</u></p>	To clarify the expectations of the Council's marketing requirements.
Appendix 7 - Glossary		Amend the existing OOLTI definition in the glossary as follows:	To clarify the distinction between OOLTI and LGS.

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		<p>“Other Open Land of Townscape Importance (<u>OOLTI</u>) Open areas, which are not extensive enough to be defined as Metropolitan Open Land, but act as pockets of greenery of local significance, contribute to the local character, and are valued by residents as open spaces in the built up area. These areas can include public and private sports grounds, some school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. <u>OOLTI is a local policy and new designations are made by the Council as part of the plan-making process. This is different to ‘Local Green Space’ (see definition above), which national policy makes provision for.</u>”</p> <p>Add new definition to glossary for ‘Local Green Space’ as follows:  <u>“Local Green Space (LGS)</u>  <u>Local communities can identify green or open space which is of special quality and holds particular significance and value to the local community which it serves, in line with paragraphs 76 to 78 of the National Planning Policy Framework (NPPF). Local Green Spaces can only be designated when a local plan or neighbourhood plan is prepared or reviewed. National policy on Green Belt applies to any designated Local Green Space.”</u></p>	
MM 23 Site Allocations			
Site Allocations	p.161 SA 7 Strathmore Centre	<p>Include text in bullet point 5 with regard to the provision of outdoor space and parking to read as follows:  “Proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way, <u>including the provision of appropriate outside space and parking related to the childcare services</u>, or elsewhere in a convenient alternative location accessible to the current community it supports.”</p>	To ensure justification and clarity of approach.

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Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	At the beginning of the 2 <sup>nd</sup> paragraph of Policy SA 8 add "and/or" to the 1 <sup>st</sup> sentence:  "A Masterplan <u>and / or</u> site development brief, ..."	To provide greater clarity, as agreed in Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Delete " <del>very</del> " from the 4 <sup>th</sup> bullet point: "It is acknowledged that this is a <del>very</del> constrained site, with the majority of the land not built on designated as Metropolitan Open Land."	To provide clarity, as agreed in Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Delete the last sentence of bullet point 4 as follows: <del>"There are also Listed Buildings, Buildings of Townscape Merit as well as sports playing fields."</del>	For clarity as the 4th bullet point seeks to address issues and constraints in relation to MOL, whereas the 5th bullet point is in relation to heritage assets, as agreed in Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Insert at beginning of 5 <sup>th</sup> bullet point: " <u>There are also Listed Buildings, Buildings of Townscape Merit as well as sports playing fields.</u> "	For clarity as the 4th bullet point seeks to address issues and constraints in relation to MOL, whereas the 5th bullet point is in relation to heritage assets, as agreed in Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).
Site Allocations	p.162	Amend bullet point 5 (in addition to change PE/SA8/4 above) to	To further emphasise the

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	SA 8 St. Mary's University, Strawberry Hill	stress the significance of the heritage assets to read:  "Any development proposal has <u>to take account of the highly significant heritage assets</u> and respect the special and unique location and setting of St Mary's University, <u>including the Grade I Listed Chapel</u> , the adjoining Grade I Listed Building (Strawberry Hill House) and the associated Historic Park and Garden <u>(II*)</u> as well as ..."	sensitivity of the site as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Insert new bullet point within the supporting text (after the 5th bullet point) as follows:  <u>"The existing playing fields and sports facilities should be retained and/or re-provided, and if necessary, replacement facilities will have to be provided on or off site."</u>	For clarification as agreed in Statement of Common Ground with Sport England (21 September 2017) (LBR-LP-024).
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Amend the 6 <sup>th</sup> bullet point:  "The Council will work with the University on a Masterplan <u>and / or site development</u> brief (SPD) for the longer term upgrading of their sites, ..."	To provide greater clarity as agreed in Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Amend the 7 <sup>th</sup> bullet point: "Detailed guidance on design and local character for any redevelopment proposal will also be set out within <del>the site brief (SPD)</del> <u>as well as in the relevant Village Planning Guidance SPD, and where relevant within the Masterplan / site development brief.</u> "	To provide greater clarity as agreed in Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009).
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Amend the 1st paragraph of Policy SA 8 to read:  Retention and upgrading of St Mary's University and its associated teaching, sport and student residential accommodation. Upgrade works to include refurbishment,	The use of the word 'justified' is considered to be a more suitable reference point for the need to demonstrate very special circumstances against the

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		adaptation, <u>intensification</u> , extensions and new build elements on site where <del>appropriate</del> <u>justified fully with regard to national policy and the policies of the development plan.</u>	development plan and national policy in the event a planning application arose to be determined that affected Metropolitan Open Land and which was otherwise 'inappropriate development' by definition. The modification has been agreed by the Council and the GLA on behalf of the Mayor of London.
Site Allocations	P.170 SA 14 Kneller Hall	Amend bullet point 6 as follows:  "It is expected that the existing playing field will be retained and where possible upgraded, <u>such as with ancillary facilities, including changing provided to support the use of the playing fields</u> , provided that any existing ecological benefits and the openness and character of the Metropolitan Open Land is retained and, where possible enhanced."	For clarity and to address Sport England's comments in relation to ancillary facilities as agreed in Statement of Common Ground with Sport England (21 September 2017) (LBR-LP-024).
Site Allocations	P.170 SA 14 Kneller Hall	Amend the last sentence of bullet point 7 to read: "Any development should <u>be sensitive to the significance of the historic building and</u> respond positively to the setting of the Listed Building."	To stress the significant heritage assets as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
Site Allocations	P.170 SA 14 Kneller Hall	Change to the first sentence of main policy text: <del>"If the site is declared surplus to requirements, It has been announced that Kneller Hall will be released for disposal.</del> <u>Appropriate land uses include..."</u>	To clarify status of disposal, as agreed with the Defence Infrastructure Organisation (3 October 2017).
Site Allocations	p. 176 SA 17 St Michael's	Amend the OSNI area on the map to that lying to the north of the lawn area and its delineating path.	To clarify.

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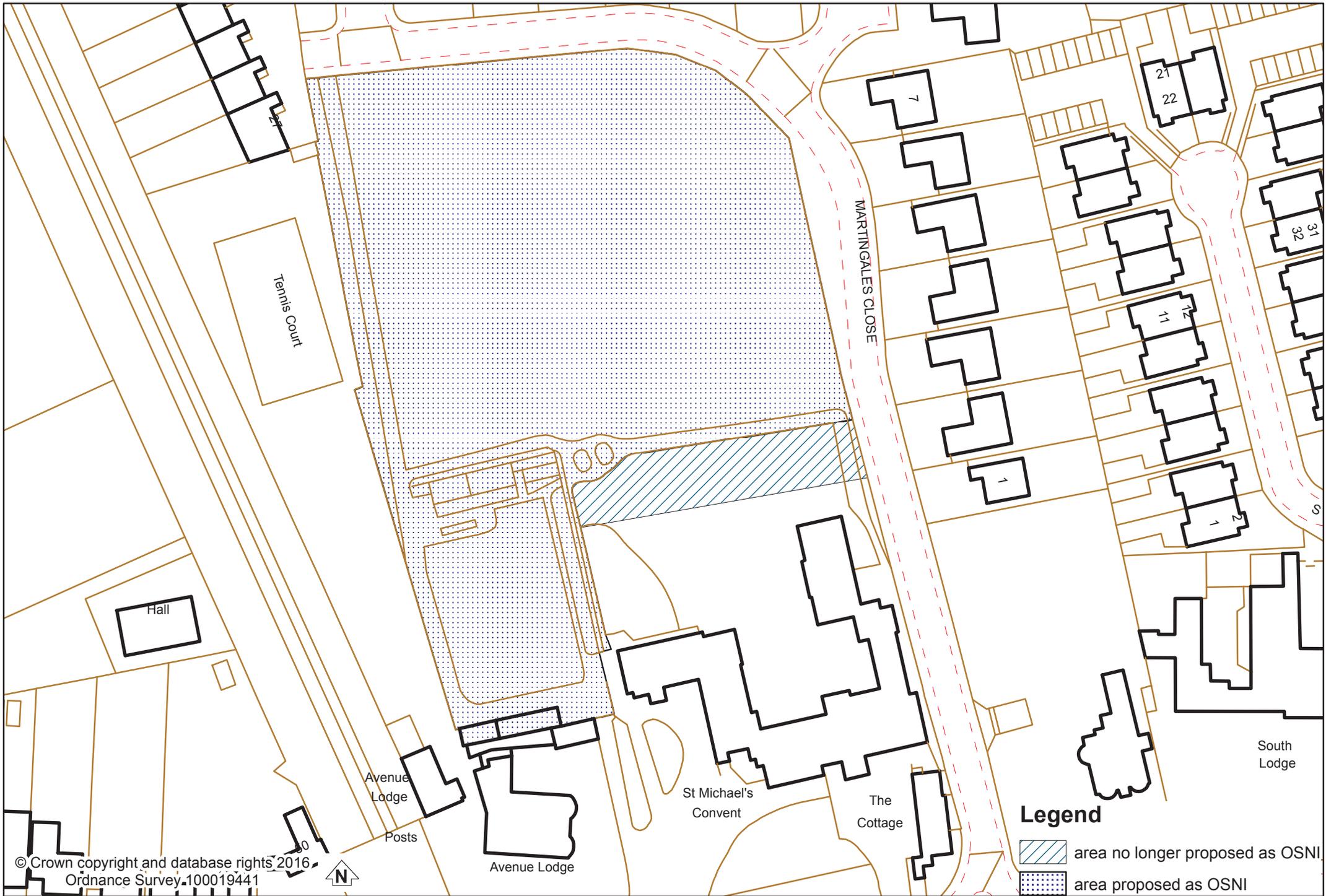
Policy Section or heading	Page / Paragraph	Proposed Change	Reason for the change
	Convent		
Site Allocations	p.182 SA 22 Pools on the Park	Add a third sentence to the end of Policy SA 22 thus: <u>"Any proposal would need to be fully justified having assessed the significance of the building and its setting, and having taken into account the wider heritage designations that apply to the site."</u>	To give greater recognition to the heritage assets and MOL setting of the site, as agreed in Statement of Common Ground with Historic England (7 September 2017) (LBR-LP-008).
Site Allocations	p.184 SA 23 Richmond Athletic Association Ground	Modify the 2 <sup>nd</sup> sentence of the policy so that Policy SA 23 reads:  "The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional associated leisure facilities and other complementary uses could be incorporated provided they <u>have been fully justified as being necessary to support the continued sporting uses on the site, that they demonstrate meeting identified needs, do not detract from the main use of the site as a sports ground, and have been developed to take into account of the Metropolitan Open Land (MOL) and historic designations.</u> "	For greater clarity
Site Allocations	p.186 SA 24 Stag Brewery	In 7 <sup>th</sup> bullet point change text to read:  "Incorporating a mix of uses, including social infrastructure and community as well as leisure, sport and health uses, and attractive frontages <del>would</del> <u>should</u> contribute to creating an inviting and vibrant new centre."	For greater clarity
Site Allocations	p.186 SA 24 Stag Brewery	Proposed modification as new additional bullet point – new 10 <sup>th</sup> bullet point (after the one referring to Mortlake Conservation Area):  <u>"The site is very close to an Air Quality Focus Area. Therefore strict mitigation measures will be required, both to mitigate any effect on current receptors and highways and on future</u>	To recognise that the air quality evidence has changed since the adoption of the site development brief in 2011.

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Policy Section or heading	Page / Paragraph	Proposed Change	Reason for the change
		<p><u>receptors within the proposed development, particularly for sensitive receptors, such as pupils at the secondary school."</u></p>	
Site Allocations	p.186 SA 24 Stag Brewery	<p>Amend penultimate bullet point as follows:</p> <p><del>"There may be an opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site. The adopted development brief (2011) identifies a number of transportation and highways issues. The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where possible necessary improvements to sustainable modes of travel, including public transport facilities, can be are secured as part of any development proposal. The opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site should be investigated as part of the comprehensive redevelopment."</del></p>	To recognise existing constraints and strengthen the need for improvements to sustainable travel modes where necessary.
Site Allocations	p.186 SA 24 Stag Brewery	<p>Amend first bullet point as follows:</p> <p>"The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities. <u>Any proposed development should have regard to the adopted brief."</u></p>	To clarify that any development scheme coming forward has to have regard to the adopted SPD.
Site Allocations	p.186 SA 24 Stag Brewery	<p>Insert after the original 10<sup>th</sup> bullet point the following:</p> <p><u>The playing fields in the south west corner of the site, which are designated Other Open Land of Townscape Importance (OOLTI), should be retained and/or reprovided and upgraded. In the event of reprovision and upgrading, where a comprehensive approach to redevelopment can be taken in line with policy LP 14, it may be acceptable to re-distribute designated OOLTI</u></p>	To set out the context for 'reprovision'.

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Policy Section or heading	Page / Paragraph	Proposed Change	Reason for the change
		<p><u>within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness. In addition, reprovion and upgrading of the playing fields within the site for sport uses has to be carried out in line with policy LP 31, the NPPF and Sport England Policy.</u></p>	
Site Allocations	p.186 SA 24 Stag Brewery	<p>Amend the original 9<sup>th</sup> bullet point as follows: "The site is <u>within an Archaeological Priority Area and partially within the Mortlake Conservation Area...</u>"</p>	For clarification.
Site Allocations	p.191 SA 28 Barnes Hospital	<p>Modify the 2<sup>nd</sup> sentence of policy SA 28 to read: "Any redevelopment proposal for this site will be required to prioritise the provision of a new <u>Special Education Needs 2-form entry primary school.</u>"</p>	To reflect a change in educational need
Site Allocations	p.191 SA28 Barnes Hospital	<p>In 3<sup>rd</sup> bullet point change text to read: "There is a clear need for a new <u>Special Education Needs 2-form entry primary school</u> in this area as set out in the <u>updated</u> Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to prioritise the provision of the educational use."</p>	To reflect the change in educational need.



**Proposed Main Modification MM23 Site Allocations for St Michael's Convent – amend the OSNI area**