



London Borough of Richmond upon Thames

Local Plan

Richmond upon Thames

Appendix 1

**Local Plan consultation
from 4 January – 1 February 2016**

Please note this document is set up to be printed in A3.

Rationale and scope for review of the Core Strategy and Development Management Plan policies, including assessment against national and regional guidance, local evidence and need

Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Rationale and scope for review
CP1 Sustainable Development	Sustainable development is the theme running throughout the NPPF, incorporating the three dimensions: economic, environmental and social. The NPPF contains a presumption in favour of sustainable development. Paras 95 and 96 relate to sustainable construction.	London Plan policy 5.3 states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.	<ul style="list-style-type: none"> • Sustainable Construction Checklist SPD (draft, 2015) • Changes in requirements at national and regional level will necessitate some local policy updates to CP1. • Authority's Monitoring Report 	<p>The NPPF sets out Government's view of what sustainable development means in practice, whereby there are the following three dimensions: economic, social and environmental.</p> <p>LBRUT's policy CP1 focuses on the environmental dimension of sustainable development; in particular the effective use of land and resources as well as sustainable design and construction.</p> <p>There is a need to avoid confusion with the overarching definition of sustainable development as set out in the NPPF.</p> <p>It is therefore recommended to consider:</p> <ul style="list-style-type: none"> • amending and changing the title of the policy so that it focuses on 'sustainable construction'; • referring to the NPPF for the wider interpretation of sustainable development and the presumption in favour; • removing some of the technical detail around BREEAM and other construction requirements which can be incorporated / consolidated into DM SD 1; • updating technical details in line with current national and regional standards; and • exploring opportunities to consolidate policies.
DM SD 1 Sustainable Construction	NPPF para 95 sets out the actions that should be taken by LPAs to support the move to a low carbon future. It is unclear what the current stance on 'zero carbon' is. At the time of writing zero carbon and allowable solutions have been 'shelved' by Government but remain within the policy wording in the NPPF and London Plan.	London Plan policy 5.3 sets out a series of sustainable design principles. Also policy 5.2 minimising carbon dioxide emissions detailed below. The Mayor's Sustainable Design and Construction SPG (2014)	<ul style="list-style-type: none"> • Sustainable Construction Checklist SPD (draft, 2015) This reflects all the sustainable design principles in the NPPF and London Plan. 	<ul style="list-style-type: none"> • Overall policy direction is compliant with national and regional policy. The Council and the Mayor of London have already been requiring 40% improvement of carbon dioxide emission reductions on 2010 Building Regulations; the policy needs to be updated to reflect the recalibrated target, which is now expressed in terms of Part L 2013 Buildings Regulations; i.e. 35% improvement on Building Regulations 2013. • Consider updating the detail of the wording to reflect changes / updates at the national and regional level in relation to the Code for Sustainable Homes, zero carbon etc. • Clarify that a conversion to a residential use or a large residential extension will require a BREEAM Domestic Refurbishment 'excellent' rating • Explore opportunities to consolidate policies
CP2 Reducing Carbon Emissions	NPPF para 97: LPAs should have a positive strategy to promote energy from renewable and low carbon sources; design their policies to maximise renewable and low carbon energy development.	London Plan policy 5.2: Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy. The policy sets out the targets for carbon dioxide emissions reduction in resi and non-domestic buildings in relation to improvement on Building Regulations Policy 5.8 innovative energy technologies	<ul style="list-style-type: none"> • Sustainable Construction Checklist SPD (draft, 2015) Includes details of Council's carbon dioxide reduction targets at 35% below Building Regulations as per London Plan policy 5.2. • Evidence base for carbon emissions reductions policies (2008) • Authority's Monitoring Report 	<ul style="list-style-type: none"> • General policy direction is compliant with national and regional policy. • Opportunities to merge CP2 and CP1 should be considered (some of the technical details could be incorporated into DMP policies DM SD 1 and 2). • Consider updates to the policy in relation to the 'Energy Hierarchy' • Could remove the criterion in CP2 (C) which states that 20% energy in new developments should be renewable as this approach does not fully reflect the Energy Hierarchy in the London Plan and DM SD 2
DM SD 2 Renewable Energy and Decentralised Energy Networks	NPPF para 96: new development should comply with adopted Local Plan policies on decentralised energy supply unless it can be demonstrated	London Plan policies 5.5 and 5.6: The Mayor expects 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. Development proposals	<ul style="list-style-type: none"> • Sustainable Construction Checklist SPD (draft, 2015) • Heat Mapping Study (2012) identifies opportunities for decentralised energy networks in Richmond; the following 7 clusters were identified: 1. Richmond Centre 	<ul style="list-style-type: none"> • The policy approach is in line with the London Plan. • Some updates may be required to reflect and clarify the Energy Hierarchy and how this has to be demonstrated. • Refer to the Mayor's aspiration for decentralised energy (25% across London by 2025); although it should be

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	<p>by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable.</p> <p>NPPF para 97 (above) encourages renewable and decentralised energy.</p>	<p>should evaluate the feasibility of Combined Heat and Power (CHP) systems.</p> <p>Also Policy 5.7 on renewable energy</p> <p>Delivering London's Energy Future: the Mayor's climate change mitigation and energy strategy (2011)</p> <p>Various GLA Energy programmes</p>	<p>2. Teddington 3. Mortlake 4. Twickenham Centre 5. Richmond-Wandsworth 6. Richmond-Kingston 7. Richmond-Hounslow</p> <p>Of these identified clusters, the Mortlake opportunity is perhaps the best for a cluster within the borough alone, and would benefit from further feasibility work (e.g. as part of the Stag Brewery redevelopment)</p> <p>For maps of the above mentioned clusters, please refer to the Heat Mapping Study.</p> <ul style="list-style-type: none"> • Climate Change Strategy (2009) – this will be updated by the Council in 2016 • Evidence Base for Carbon Emissions Reduction Policies (2008) summarises the feasibility of different types of renewable energy technologies across the borough including wind, solar, ground source heating and cooling, biomass heating and CHP 	<p>acknowledged that there is relatively low probability of decentralised energy development in the borough.</p>
DM SD 3 Retrofitting	No specific guidance although implicit in the NPPF paras 93-104	London Plan policy 5.4: Boroughs should identify opportunities for reducing carbon dioxide emissions from the existing building stock by identifying potential synergies between new developments and existing buildings through the retrofitting of energy efficiency measures, decentralised energy and renewable energy opportunities (see Policies 5.5 and 5.7).	<ul style="list-style-type: none"> • Sustainable Construction Checklist SPD (draft, 2015) It is not compulsory to complete the SCC for retrofits, conversions, internal alterations etc. (although it is encouraged). 	<ul style="list-style-type: none"> • Policy is in line with the London Plan. No significant updates are likely to be necessary. • Opportunities for consolidating policies relating to climate change mitigation and sustainable construction could be explored.
CP3 Climate Change - Adapting to the Effects	NPPF paras 93-104, specifically para 99 states that 'Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change'.	<p>London Plan Chapter 5</p> <p>The Mayor's Climate Change Adaptation Strategy (2011)</p> <p>River Thames Scheme (RTS) for managing fluvial flood risk between Datchet and Teddington (Environment Agency)</p> <p>Thames Estuary 2100 (TE2100) Scheme for managing tidal flood risk in the Thames estuary (Environment Agency).</p>	<ul style="list-style-type: none"> • Council's Strategic Flood Risk Assessment (2010), currently being updated (publication expected by end of 2015) • Local Flood Risk Management Strategy 2015-2020 • Climate Change Strategy (2009) • Surface Water Management Plan (2011) • Preliminary Flood Risk Assessment (2011) • Infrastructure Delivery Plan (2012) assesses the impact of climate change on future infrastructure requirements. 	<ul style="list-style-type: none"> • Policy is in line with national and regional policy • Some updates may be required to include details of the River Thames Scheme, TE2100 and other initiatives such as Drain London.
DM SD 4 Adapting to Higher Temperatures and Need for Cooling	No specific guidance in NPPF	London Plan policy 5.9: Local Plans should develop more detailed policies to support the avoidance of overheating and to support the cooling hierarchy. Policy 5.10 Urban Greening	<ul style="list-style-type: none"> • Sustainable Construction Checklist SPD (draft, 2015) 	<ul style="list-style-type: none"> • Policy is in line with national and regional guidance • Minor updates may be required including a reference to the Sustainable Construction Checklist. • To address and refer to Urban Greening, see rationale for review under CP4 and CP10 for a potential new Green Infrastructure policy. • Explore opportunities to streamline and consolidate climate change adaptation policies where possible.
DM SD 5 Living Roofs	No specific guidance in NPPF	London Plan policy 5.11: Boroughs may wish to develop more detailed policies and proposals to support the development of green roofs and the greening of development sites. Boroughs should also promote the use of green roofs in smaller	The borough is likely to be affected by climate change effects in the medium- and long-term; therefore, living roofs may help to adapt to a changing climate by for example absorbing rainfall and alleviating surface water flooding events, as well as helping to reduce air temperatures through evaporation and evapotranspiration processes therefore counteracting the	<ul style="list-style-type: none"> • Policy is in line with national and regional policy • Consider emphasising the benefits of Green roofs on surface water flooding and potentially make more reference to Green Walls and greening of development sites • Consider reviewing the threshold of 100sqm and

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		developments, renovations and extensions where feasible.	urban heat island effect.	<p>whether it is appropriate</p> <ul style="list-style-type: none"> Explore opportunities to streamline and consolidate climate change adaptation policies where possible.
DM SD 6 Flood Risk	<p>Paras 99 -104 of NPPF and PPG on flood risk.</p> <p>The Environment Agency's standing advice and "Flood Map for Planning" is the main source of advice for applicants and developers</p>	<p>Policy 5.12 Flood Risk Management</p> <p>London FRMP and Regional Flood Risk Appraisal</p> <p>Thames Estuary 2100 (TE2100) Scheme for managing tidal flood risk in the Thames estuary (Environment Agency).</p> <p>River Thames Scheme (RTS) for managing fluvial flood risk between Datchet and Teddington (Environment Agency)</p>	<ul style="list-style-type: none"> The borough is at risk of both tidal and fluvial flooding as well as surface water flooding Council's Strategic Flood Risk Assessment (2010), currently being updated (publication expected by end of 2015) Local Flood Risk Management Strategy 2015-2020 Preliminary Flood Risk Assessment (2011) Authority's Monitoring Report 	<ul style="list-style-type: none"> Policy is in line with national and regional policy Some updates may be required in relation to the emerging updated SFRA evidence base, particularly relating to new Environment Agency data, which models the flood hazard resulting from a potential breach of the Flood Defences Consider introducing specific guidance for basement development in areas that could be severely affected in case of a breach of the raised flood defences Clarify that applicants have to use the EA's "Flood map for Planning" (rather than the EA's 'Risk of Flooding' map) as well as the SFRA to determine whether an application site is deemed to be within a flood zone
DM SD 7 Sustainable Drainage	<p>NPPF para 103: gives priority to the use of sustainable drainage systems.</p> <p>The Flood and Water Management Act (2010)</p>	<p>London Plan policy 5.13 sets out the drainage hierarchy</p> <p>Drain London</p> <p>London Sustainable Drainage Action Plan (Oct 2015 - draft for Consultation)</p>	<p>The London Borough of Richmond is a designated Lead Local Flood Authority (LLFA), under the Flood and Water Management Act (2010), and is responsible for managing local flood risk across the borough, including surface water.</p> <p>Surface Water Management Plan (2011): Richmond borough is susceptible to surface water flooding (high likelihood of heavy rainfall and storms overloading the drainage system).</p> <p>LBRuT SuDS Guidance Document (2015)</p> <p>The Council adopted a Local Validation Checklist in April 2015, with amendments made in September 2015, which requires a Statement on Sustainable Drainage Systems for all major developments; all others are encouraged (as part of the Flood Risk Assessment, Sustainable Construction Checklist or separate statement)</p>	<ul style="list-style-type: none"> Policy is in line with national and regional policy Updates will need to be considered in relation to the Council's role as a LLFA when assessing surface water drainage proposals Align the policy with the requirements set out in the Local Validation Checklist, which states that major developments have to submit a Drainage Statement (which will be assessed by the LLFA) Clarify that this policy relates to all new development that could lead to changes and impacts on the surface water run-off, and not just major developments Reflect the Mayor's aspiration to achieve a 25% reduction in surface water flows in London's sewer network by 2040. Refer to borough-specific SuDS Guidance Document
DM SD 8 Flood Defences	<p>No specific national guidance on flood defences.</p> <p>Other legislation</p> <ul style="list-style-type: none"> Water Resources Act 1991 Flood Defence (Land Drainage) Byelaws/Sea Defence Byelaws Environment Act 1995 Flood and Water Management Act 2010 	See London Plan policy 5.12	<ul style="list-style-type: none"> Council's Strategic Flood Risk Assessment (2010), currently being updated (publication expected by end of 2015) Thames Estuary 2100 (TE2100) scheme for managing tidal flood risk in the Thames estuary (Environment Agency) will allow water levels to rise and there is a requirement to raise the height of flood defences. Separate consent from the Environment Agency is required for any works within 16 metres of the tidal Thames flood defences; and for any works within 8 metres on a fluvial river (including River Crane, Beverley Brook, fluvial River Thames, which is upstream of Teddington Lock); this is irrespective of planning permission 	<ul style="list-style-type: none"> Policy is in line with national and regional policy Some minor updates may be required, such as with regard to the TE2100 scheme Could also consider consolidating with flood risk policy
DM SD 9 Protecting Water Resources and Infrastructure	NPPF para 94: Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations.	<p>London Plan policy 5.14: Boroughs should identify wastewater infrastructure requirements</p> <p>Policy 5.15: Residential development should minimise the use of mains water. Sets out a target of 105 litres or less per head per day</p>	<p>Changing patterns of rainfall will impact on water resources and water quality. Less water will be available during summers due to lower rainfall while at the same time the demand will increase.</p> <p>Sustainable Construction checklist SPD (2015) sets out the requirement for residential developments to minimise the use of mains water by incorporating water saving measures and</p>	<ul style="list-style-type: none"> This policy is in line with national and regional policy insofar as it seeks to protect water resources and supplies by encouraging water efficiency and improving the quality of rivers and groundwater References to Code for Sustainable Homes will need to be removed Policy will need to set out clearly that the optional higher standard of water efficiency as set out in the Building

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	<p>Para 100: Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape.</p> <p>Building Regulations Part G</p>	<p>Thames River Basin Management Plan (2009)</p>	<p>equipment, and designing dwellings so that mains water consumption would meet a target of 105 litres or less per head per day (excluding an allowance of 5 litres or less per head per day for external water consumption) – this is in line with the national optional higher standard that can be applied in water stressed areas.</p>	<p>Regulations applies in this borough, and references will be needed to the Sustainable Construction Checklist.</p>
<p>DM SD 10 Water and Sewerage Provision</p>	<p>No specific guidance in NPPF</p>	<p>London Plan policy 5.14: developments must ensure that adequate wastewater capacity is available.</p>	<p>Need to address potential sewer flooding and ensuring capacity exists in the existing public sewerage and water supply networks to serve new developments</p> <p>Infrastructure Delivery Plan (2012) assesses the impact of climate change on future infrastructure requirements.</p> <p>Thames Water Assessment Management Plan (2015-2020)</p>	<ul style="list-style-type: none"> • Policy is in line with national and regional policy • Some minor updates may be required (following liaison with Thames Water Utilities)
<p>CP6 Waste</p>	<p>National Planning Policy for Waste (2014)</p> <p>National Waste Management Plan for England (2013)</p> <p>National policy statements for waste water and hazardous waste</p>	<p>London Plan policy 5.16 on waste net self-sufficiency states that the Mayor wishes to manage the equivalent of 100% of London's waste within London by 2026 and work towards zero biodegradable or recyclable waste to landfill by 2026.</p> <p>Policy 5.17 states that boroughs must allocate sufficient land and identify waste management facilities to provide capacity to manage the tonnages of waste apportioned in this Plan. If there is a loss of an existing waste management site to non-waste use, additional compensatory site provision will be required.</p> <p>Policy 5.18 states that local plans should require developers to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials.</p> <p>Policy 5.20 requires local plans to support the development of aggregate recycling facilities, subject to local amenity conditions.</p>	<p>The Council is required to meet the London Plan apportionment requirements and comply with national policy and the national waste management plan.</p> <p>Due to the adoption of the West London Waste Plan (WLWP) (2015), local Core Strategy policy CP6 and UDP policy CCE22 have been superseded.</p> <p>There is an adopted SPD on Refuse and Recycling Storage Requirements (2015) that needs to be referred to by a policy</p> <p>Local Validation Checklist (2015)</p> <p>London Plan Policy 5.16 sets a target of 95 per cent for recycling/ reuse of CE&D waste by 2020.</p>	<p>The Core Strategy policy CP6 has been superseded by the West London Waste Plan.</p> <p>The evidence suggests however that there is a need for a new waste management policy that could cover:</p> <ul style="list-style-type: none"> • requirements for developers to produce site waste management plans and for the efficient handling of construction, excavation and demolition waste and materials (in line with London Plan policy) • consider reference to aggregate recycling • ensure that new development, including change of use, provides accessible, adequate and well-designed internal and external storage facilities for residual waste and recycling • encourage waste to be treated as close to the source as possible • maximise the potential use of rail and water transport • refer to the Refuse and Recycling Storage Requirements SPD (2015) • refer to the WLWP (2015)
<p>CP4 Biodiversity</p>	<p>This policy is in accordance with the NPPF, which states that the planning system should contribute to and enhance the natural and local environment and that Local Plans should plan positively for the creation, protecting and enhancement and management of networks of biodiversity and green infrastructure.</p> <p>See NPPF paras 109, 113, 114 and 117, and PPG in relation to biodiversity, ecosystems and</p>	<p>This policy is in general conformity with the London Plan, which requires local policies to protect priority species and habitats, ensure sites of European and national importance are clearly identified, and identify, protect and enhance corridors of movement, such as green corridors that are of strategic importance.</p> <p>See London Plan policy 7.19</p> <p>All London Green Grid SPG (2012)</p> <p>Mayor's Biodiversity Strategy (2002)</p>	<ul style="list-style-type: none"> • Need to identify, protect and enhance biodiversity including the sites of importance for nature conservation in the borough • Need to require new biodiversity features to be incorporated into new developments to provide net gains in biodiversity where possible. • Richmond Biodiversity Action Plan (2005) • Authority's Monitoring Report 	<ul style="list-style-type: none"> • The policy is in line with national and regional guidance. • Consider creating a new policy on green infrastructure, highlighting the multi-functional network of open spaces, their value for biodiversity and reflecting the green corridors that are of strategic importance. The strategic Biodiversity policy could then link to and cross-refer to the new green infrastructure policy.

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	green infrastructure.	Development plan policies for biodiversity - Best Practice Guidance of The London Plan (2005) London Biodiversity Action Plan		
Policy DM OS 5 Biodiversity and new development	<p>This policy is in accordance with the NPPF, which states that the planning system should contribute to and enhance the natural environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible.</p> <p>See NPPF para 109 and PPG in relation to biodiversity, ecosystems and green infrastructure.</p>	<p>This policy is in general conformity with the London Plan, which requires local policies to protect priority species and habitats, ensure sites of European and national importance are clearly identified, and identify, protect and enhance corridors of movement, such as green corridors that are of strategic importance.</p> <p>See London Plan policy 7.19</p> <p>All London Green Grid SPG (2012)</p> <p>Mayor's Biodiversity Strategy (2002)</p> <p>Development plan policies for biodiversity - Best Practice Guidance of The London Plan (2005)</p> <p>London Biodiversity Action Plan</p>	<ul style="list-style-type: none"> • Need to identify, protect and enhance biodiversity including the sites of importance for nature conservation in the borough • Need to require new biodiversity features to be incorporated into new developments to provide net gains in biodiversity where possible. • Richmond Biodiversity Action Plan (2005) 	<ul style="list-style-type: none"> • The policy is in line with national and regional guidance. • Consider consolidating this detailed policy with the strategic policy on biodiversity.
CP7 Maintaining and Improving the Local Environment	<p>This policy is considered to be in general conformity with NPPF and PPG, which focus on high quality design and conserving heritage assets.</p> <p>See NPPF core planning principles as well as paras 17, 58-61, 126, 137, 141,156 and 157(7) (8) as well as the PPG relating to the historic environment. In addition, paras 126 and 157(8) refer to the overarching requirement for a positive strategy for the historic environment.</p>	<p>The London Plan and its supporting portfolio of Shaping Neighbourhoods SPGs highlight the importance of good design and local character. This local policy complements the regional and national guidance and sets out how the differing local characters should be sustained, protected and enhanced.</p> <p>See London Plan policies 7.1, 7.4, 7.5 and the Shaping Neighbourhoods – Character and Context SPG (2014).</p>	<ul style="list-style-type: none"> • Village Planning Guidance (SPDs): locally specific guidance on design, character and local features / assets; to be established for all village areas of the borough; Adopted SPDs Village Plan SPD - Kew (2014), Village Plan SPD - Whitton and Heathfield (2014); To be adopted in 2015: Mortlake, Barnes and East Sheen; Emerging SPDs: St Margarets, Richmond and East Twickenham (consultation carried out in autumn 2015); Rolling programme to be continued into 2016 and 2017 • Design Quality SPD (2006) • Public Space Design Guide (2006) • Town Centre Health Checks (2013) • Town Centre Environmental Quality Assessment (December 2012) • LBRuT Community Plan (2013-2018) 	<ul style="list-style-type: none"> • The policy is in line with national and regional guidance. • In light of the Council's approach to village planning and the changes in the NPPF, there is a need to update the policy in relation to: <ul style="list-style-type: none"> - Village Plan SPDs - reflecting guidance on higher densities and taller buildings as set out in the design policies - setting out the positive strategy for the historic environment - reflecting guidance on how the historic environment can make a positive contribution to achieving good design - 'Uplift' programme as set out in the Council's Community Plan, although this could also be included within the Council's Infrastructure Delivery Plan
DM HD 1 Conservation Areas - designation, protection and enhancement	<p>Whilst the policy is overall in accordance with national policy, there is a need to reflect the guidance on designated heritage assets and how to assess substantial harm.</p> <p>See NPPF core planning principles as well as paras 17, 127, 128, 129, 132, 133 and 137 as well as the PPG relating to designated heritage assets.</p>	<p>This policy complements the London Plan, which states that heritage assets, including their settings, should be identified, protected, enhanced, and access improved where appropriate.</p> <p>See London Plan policy 7.8, which applies to both designated and non-designated assets</p>	<ul style="list-style-type: none"> • Need to protect the borough's Conservation Areas • New development should conserve and where appropriate enhance the character and appearance of the Conservation Areas • Conservation Area studies and Conservation Statements • Conservation Area SPG (2005) • Design Quality SPD (2006) 	<ul style="list-style-type: none"> • Whilst there is a statutory duty to protect designated heritage assets, in light of changes to national guidance, the following updates could be considered to ensure that: <ul style="list-style-type: none"> - the protection of designated heritage assets is consistent with its significance - the assessment of harm and substantial harm relates to its significance - a deteriorated state of an asset as a result of deliberate neglect or damage is not taken into account when making decisions. • Policies relating to designated heritage assets (i.e. World

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				<p>Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Parks and Gardens and Conservation Areas) could be consolidated as the same principles and tests apply when assessing harm or substantial harm to a designated heritage asset.</p> <p>However, given the borough's exceptional heritage, it may be justified to retain the approach of individual policies for individual heritage assets.</p>
<p>DM HD 2 Conservation of Listed Buildings and Scheduled Ancient Monuments</p>	<p>Whilst the policy is overall in accordance with national policy, there is a need to reflect the guidance on designated heritage assets and how to assess substantial harm.</p> <p>See NPPF core planning principles as well as paras 17, 127, 128, 129, 132, 133 and 137 as well as the PPG relating to designated heritage assets.</p>	<p>This policy complements the London Plan, which states that heritage assets (applicable to both designated and non-designated assets), including their settings, should be identified, protected, enhanced, and access improved where appropriate.</p> <p>See London Plan policy 7.8, which applies to both designated and non-designated assets</p>	<ul style="list-style-type: none"> • Need to preserve and where possible enhance Listed Buildings • Need to preserve and where possible enhance Scheduled Ancient Monuments • Listed Buildings SPG (2005) • Historic Buildings – Maintenance and Repair SPG (2005) 	<ul style="list-style-type: none"> • In light of changes to national guidance, there is a need to update the policy to ensure that: <ul style="list-style-type: none"> - the protection of designated heritage assets is consistent with its significance - the assessment of harm and substantial harm relates to its significance - a deteriorated state of an asset as a result of deliberate neglect or damage is not taken into account when making decisions. • Policies relating to designated heritage assets (i.e. World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Parks and Gardens and Conservation Areas) could be consolidated as the same principles apply when assessing harm or substantial harm to a designated heritage asset. <p>However, given the borough's exceptional heritage, it may be justified to retain the approach of individual policies for individual heritage assets.</p>
<p>DM HD 3 Buildings of Townscape Merit</p>	<p>Whilst the policy is overall in accordance with national policy, there is a need to reflect the guidance on non-designated heritage assets and how to achieve a balanced judgement with regard to any potential harm and the significance of the asset.</p> <p>See NPPF core planning principles as well as paras 17, 135 and the PPG on non-designated heritage assets.</p>	<p>This policy complements the London Plan, which states that heritage assets, including their settings, should be identified, protected, enhanced, and access improved where appropriate.</p> <p>See London Plan policy 7.8, which applies to both designated and non-designated assets</p>	<ul style="list-style-type: none"> • Need to preserve Buildings of Townscape Merit • Need to set out criteria for the designation of locally listed buildings • Buildings of Townscape Merit SPD (May 2015) 	<ul style="list-style-type: none"> • In light of changes to national guidance, there is a need to update the policy to ensure that: <ul style="list-style-type: none"> - the protection of non-designated heritage assets is consistent with its significance - the assessment of harm relates to its significance, - a deteriorated state of an asset as a result of deliberate neglect or damage is not taken into account when making decisions - Also need to take account of legislative changes such as the Equality Act 2010. • Policies relating to non- designated heritage assets' (i.e. Buildings of Townscape Merit, Archaeological Sites and war memorials) could be consolidated as the same principles apply when assessing harm to a non-designated heritage asset.
<p>DM HD 4 Archaeological Sites</p>	<p>Whilst the policy is overall in accordance with national policy, there is a need to reflect the guidance on non-designated heritage assets and how to assess substantial harm. In addition, there is a need to reflect the two categories of non-designated sites of archaeological interest as set out in the NPPF and PPG.</p>	<p>This policy complements the London Plan, which states that heritage assets and archaeology should be identified and protected.</p> <p>The Greater London Archaeological Priority Areas (APAs) are areas where there is significant known archaeological interest or potential for new discoveries. APAs are used to help highlight where development might affect heritage assets.</p>	<ul style="list-style-type: none"> • Need to protect, enhance and promote borough's archaeological heritage • Need to reflect the Greater London Archaeological Priority Areas (APAs) in the borough 	<ul style="list-style-type: none"> • Early discussions with GLAAS (Greater London Archaeology Advisory Service) have confirmed their support and preference for a stand-alone policy relating to archaeology and the inclusion of a map of APAs within the Local Plan/Proposals Map. It is understood that the APA's in Richmond will not be expected to be reviewed until 2018. • In light of changes to national guidance, there is a need to update the policy to ensure that: <ul style="list-style-type: none"> - The national guidance's two categories of non-

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	See NPPF core planning principles (para 17) and PPG.	See London Plan policies 7.8, which applies to both designated and non-designated assets, and policy 7.9 as well as London's Foundations SPG (2012)		<p>designated sites of archaeological interest are reflected in the policy</p> <ul style="list-style-type: none"> - the protection of non-designated heritage assets is consistent with its significance - the assessment of harm relates to its significance, - a deteriorated state of an asset as a result of deliberate neglect or damage is not taken into account when making decisions.
DM HD 5 World Heritage Site	<p>Whilst the policy is overall in accordance with national policy, there is a need to reflect the guidance on designated heritage assets and how to assess substantial harm.</p> <p>See NPPF core planning principles as well as paras 17, 127, 128, 129, 132, 133 and 137 and the PPG on World Heritage Sites.</p>	<p>This policy complements the London Plan policy 7.10, which states that new development in and within the buffer zone of the World Heritage Sites should conserve, promote, make sustainable use of and enhance their significance.</p> <p>London's World Heritage Sites - Guidance on Settings SPG (2012)</p>	<ul style="list-style-type: none"> • Royal Botanic Gardens Kew Landscape Master Plan (2010) • Royal Botanic Gardens Kew World Heritage Site Management Plan (2011) • Need to protect, promote, conserve and where appropriate enhance the Royal Botanic Gardens Kew World Heritage Site (WHS) • Need to ensure that the buffer zone is taken into account in relevant planning applications • Potential need for a study to address the inter-visibility between potential sites for tall buildings in Hounslow and Kew World Heritage Site (in liaison with LB Hounslow) 	<ul style="list-style-type: none"> • In light of changes to national guidance, there is a need to update the policy to ensure that: <ul style="list-style-type: none"> - the protection of designated heritage assets is consistent with its significance - the assessment of harm and substantial harm relates to its significance, whereby the focus is on the degree of harm rather than the scale of development • Evidence suggests that a map of the Kew WHS and particularly its buffer zone should be included within the Plan. • Could expand on the outstanding universal value of the Royal Botanic Gardens Kew World Heritage Site • Policies relating to designated heritage assets (i.e. World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Parks and Gardens and Conservation Areas) could be consolidated as the same principles apply when assessing harm or substantial harm to a designated heritage asset. However, given the uniqueness of Kew WHS, and in line with national and regional guidance, it may be preferred to retain a separate policy on this.
DM OS 4 Historic Parks, Gardens and Landscapes	<p>Whilst the policy is overall in accordance with national policy, there is a need to reflect the guidance on designated heritage assets and how to assess substantial harm.</p> <p>See NPPF core planning principles as well as paras 17, 127, 128, 129, 132 and 133 as well as the PPG relating to designated heritage assets.</p>	<p>This policy complements the London Plan, which states that heritage assets, including their settings, should be identified, protected, enhanced, and access improved where appropriate.</p> <p>See London Plan policy 7.8.</p>	<ul style="list-style-type: none"> • Historic England 'Register of Historic Parks and Gardens' • Need to preserve and where possible enhance registered historic parks and gardens. • Authority's Monitoring Report 	<ul style="list-style-type: none"> • In light of changes to national guidance, there is a need to update the policy to ensure that: <ul style="list-style-type: none"> - the protection of designated heritage assets is consistent with its significance - the assessment of harm and substantial harm relates to its significance - a deteriorated state of an asset as a result of deliberate neglect or damage is not taken into account when making decisions. • Policies relating to designated heritage assets (i.e. World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Parks and Gardens and Conservation Areas) could be consolidated as the same principles apply when assessing harm or substantial harm to a designated heritage asset. However, given the borough's exceptional heritage, it may be justified to retain the approach of individual policies for individual heritage assets.
DM HD 6 War Memorials	Whilst there is no specific guidance in the NPPF and PPG relating to war memorials, overall the policy is in	This policy complements the London Plan, which states that heritage assets, including their settings, should be identified, protected, enhanced, and access improved	The Council is keen to continue the protection and conservation of the borough's war memorials	<ul style="list-style-type: none"> • In light of changes to national guidance, there is a need to update the policy to ensure that war memorials are also treated as non-designated heritage assets and that their protection is consistent with their significance.

Rationale and scope for review of the Core Strategy and Development Management Plan policies, including assessment against national and regional guidance, local evidence and need

Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Rationale and scope for review
	<p>accordance with national policy, although there is a need to reflect the guidance on non-designated heritage assets.</p> <p>See NPPF core planning principles as well as paras 17, 135 and the PPG on non-designated heritage assets.</p>	<p>where appropriate.</p> <p>See London Plan policy 7.8.</p>		<ul style="list-style-type: none"> • Policies relating to non- designated heritage assets' (i.e. Buildings of Townscape Merit, Archaeological Sites and war memorials) could be consolidated as the same principles apply when assessing harm to a non-designated heritage asset.
DM HD 7 Views and Vistas	<p>Overall this policy is in accordance with the NPPF and the PPG Design guidance</p>	<p>This policy complements the London Plan policies in relation to the Mayor's identified strategic views that have to be protected, whereby the only strategic view in this borough is the view from King Henry VIII's Mound to St Paul's Cathedral.</p> <p>See London Plan policies 7.11 and 7.12 and the London View Management Framework SPG (2012)</p>	<ul style="list-style-type: none"> • Need to protect and where appropriate enhance the quality of views and vistas as identified in the Local Plan Proposals Map • Need to ensure that new developments do not negatively impact on designated views and vistas in terms of their design quality, configuration, height and layout • Whilst the London Plan policies and accompanying SPG provides detailed guidance on the strategic views, there is a need to describe the locally designated views and vistas in more detail (either as part of the policy justification or within SPD) • Need to clearly set out in policy what views and vistas are and ensure they can be clearly identified on the Local Plan Proposals Map 	<p>The need and evidence suggests that the policy should be updated as follows:</p> <ul style="list-style-type: none"> • the difference between views and vistas should be clearly set out; • a description of the individual views and vistas is required; and • the Proposals Map needs to clearly set out the designated views and vistas.
DM DC 1 Design Quality	<p>The NPPF puts great weight and importance on high quality design and good standard of amenity for all. Design policies should however avoid unnecessary prescription or detail and should not impose architectural styles or particular tastes, nor stifle innovation, originality or initiative; instead policies should promote and reinforce local distinctiveness.</p> <p>See NPPF para 17, 56, 58, 59, 60, 61 and 62</p> <p>PPG design guidance on:</p> <ul style="list-style-type: none"> • layout – the way in which buildings and spaces relate to each other • form – the shape of buildings • scale – the size of buildings • detailing – the important smaller elements of building and spaces • materials – what a building is made from 	<p>London Plan policies focus on good quality environment, high architectural quality and ensuring that the design of new buildings and spaces reinforces or enhances the character of the neighbourhood; appropriate scale, proportion, detailing and materials should complement local character.</p> <p>See policies 7.1 and 7.6</p>	<ul style="list-style-type: none"> • Need for new developments to be of high quality design and high architectural quality. • The Council is developing Village Planning Guidance in the form of SPDs for all the village areas of the borough. • Village Plan SPDs provide locally specific guidance on design, character and local features or assets that the communities have identified as being important to their local area. • Village Plan SPDs enable the Council to look in more detail at the individuality and local character of the villages and clusters of streets. • Village Plan SPD - Kew (2014) • Village Plan SPD - Whitton and Heathfield (2014) • Design Quality SPD (2006) • Small and Medium Housing Sites SPD (2006) • House Extensions and External Alterations SPD (2015) • Public Space Design Guide (2006) 	<p>In light of guidance contained within the NPPF and PPG as well as the Council's Village Plan programme for SPDs for all village areas, the policy should be updated to:</p> <ul style="list-style-type: none"> • reflect the Village Plan SPDs and refer to them for the local character and design guidelines • strengthen the focus of the policy on high quality design • put more emphasis on the Village Plan as well as other SPDs (Design Quality, House Extensions and External Alterations, Small and Medium Housing Sites SPD, Front Garden SPDs) as they provide the necessary detail to assess context, local character and design quality • take account of design guidance contained within housing and transport policies and ensure design guidance is aligned and consolidated where possible whilst retaining current approaches
DM DC 2 Layout and Design of Mixed Use Schemes	<p>The NPPF states that the potential of sites should be optimised by creating and sustaining an appropriate mix of</p>	<p>London Plan policy 4.3 relates to mixed use development and offices and policy 7.1 to lifetime neighbourhoods.</p>	<p>Need to ensure that different mix of uses on a site are suitable and compatible</p>	<p>Whilst the policy is in general conformity with national and regional guidance, consider consolidating the guidance in relation to suitability and compatibility of different mix of uses with other policies (e.g. policies on design quality,</p>

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Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Rationale and scope for review
	uses. See NPPF paras 57 and 58 as well as the PPG design guidance			employment and possibly with new policy on local environmental impacts and pollution and living conditions)
DM DC 3 Taller Buildings	PPG Design guidance applies, which states that buildings can be formed in many ways, for example tall towers, individual standalone units, long and low blocks, terraces. They can all be successful, or unsuccessful, depending on where they are placed, how they relate to their surroundings, their use and their architectural and design quality. Historic England Advice Note on Tall Buildings (Dec 2015)	London Plan Policy 7.7 deals with the location and design of tall and large buildings. This policy requires boroughs to identify in their plans 'appropriate', 'sensitive' and 'inappropriate' locations for tall buildings. In addition, the policy sets out criteria for assessing when proposals would be unacceptable.	<ul style="list-style-type: none"> • Within Richmond Borough the character is predominantly low rise and even in Richmond and Twickenham taller buildings are of modest height compared to areas in Central London and other parts of London, such as Wandsworth or Croydon. • Borough's evidence base to address London Plan policy 7.7 is set out in the Borough-wide Sustainable Urban Development Study (2008), which <ul style="list-style-type: none"> - identifies "taller" as being significantly taller than the neighbouring buildings, but less than 18 metres in height (below six storeys); - identifies a "tall" building as a building of 18 metres in height or higher; - identifies Richmond and Twickenham town centres as areas where taller buildings may be appropriate. The potential for tall buildings is generally clustered close to train stations; - identifies Whitton, East Sheen, Teddington as potential for taller buildings in town centre locations; - identifies Mortlake, St Margarets, Strawberry Hill, Hampton Hill, Hampton Wick, Barnes as areas where taller buildings will be inappropriate in general; and it - identifies Hampton, Heathfield, Ham, Petersham, and Kew as areas where taller buildings will be inappropriate. 	The evidence, including feedback on the application of this policy, suggests that the policy should be updated by: <ul style="list-style-type: none"> • removing out of date references to PPS5 • update existing CABE reference to new Historic England guidance on tall buildings • clarifying the definitions for "tall" and "taller" in line with the borough-wide Study (2008) • clearly defining what the 'appropriate', 'sensitive' and 'inappropriate' locations are for tall buildings in this borough as required by the London Plan and by using the evidence contained within the borough-wide Study • adding guidance on how to assess potential applications for tall and taller buildings outside the areas that are identified as 'appropriate' • adding guidance on how to assess applications where there are already existing tall or taller buildings in areas which fall within sensitive and inappropriate locations; this is important so that site specific circumstances can be taken into account
DM DC 4 Trees and Landscape	NPPF para 118 states that permission should be refused if development results in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.	London Plan policy 7.21 states that trees and woodlands should be protected, maintained, and enhanced. Existing trees of value should be retained and any loss as the result of development should be replaced. Wherever appropriate the planting of additional trees, should be included in new developments, particularly large-canopied species. Boroughs should develop appropriate policies to implement their borough tree strategy. Guidance for boroughs to prepare their own tree strategies is contained within the Borough Tree and Woodland Strategies SPG (2013).	<ul style="list-style-type: none"> • Richmond Council's Tree Management Policy • Need to develop a borough-wide tree strategy to underpin policies • Need to develop appropriate policies to implement the borough's tree strategy • Need to update areas of deficiencies in numbers of trees within the Proposals Map • Need to ensure multiple benefits of trees are realised and therefore linked with other policy areas including air quality, climate change (reducing the urban heat island effect, carbon sequestration etc.), flood risk management, traffic calming, health and wellbeing. • Aerial studies of canopy cover can calculate a functional value of a collective tree resource. Overall, the Council aims to increase the canopy cover in the borough through planting street trees where the need has been identified. 	Whilst a borough tree strategy should be prepared to comply with London Plan policy 7.21, the policy could be updated with regard to the following: <ul style="list-style-type: none"> • Ensure multiple benefits of trees are realised and referred to in other policy areas, including air quality, climate change, flood risk, health and wellbeing etc. • Consider specific requirements for developments, including more stringent requirements for relevant development proposals in areas of deficiencies in numbers of trees, including considering the use of planning obligations to provide for an off-site / street-tree where appropriate. • Need to retain large canopy trees wherever possible and ensure development is designed and constructed in a way that is not detrimental to the health and longevity of retained specimens. However, a balance will be required in terms of the impacts on sunlighting, daylighting, especially in narrower streets. • Need to accommodate new trees that develop larger canopies and maximise the potential of any new trees.
DM DC 5 Neighbourliness, Sunlighting and Daylighting	NPPF (para 17) refers to securing a good standard of amenity for existing and future occupants.	London Plan policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly	<ul style="list-style-type: none"> • Need to protect adjoining properties from unreasonable loss of privacy, visual intrusion, pollution, noise, disturbance and overshadowing, and enable sufficient sunlight and daylight to penetrate into and between 	The evidence, including feedback on the implementation of the policy, suggests that the policy should be updated to: <ul style="list-style-type: none"> • define what is meant by unneighbourly, overbearing, overlooking, habitable rooms, outlook, private view etc.

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	<p>PPG</p> <ul style="list-style-type: none"> • Design guidance • Guidance on light pollution 	<p>in relation to privacy and overshadowing.</p> <p>The draft interim Mayor of London Housing SPG (2015) sets out standards for privacy, daylight and sunlight</p> <p>Some guidance on sunlighting and daylighting is also contained within the London Housing Design Guide (Interim Edition) 2010</p>	<p>buildings.</p> <ul style="list-style-type: none"> • Residential Development Standards SPD (2010) • Housing Optional Technical Standards update (2015) • Policy refers to Building Research Establishment (BRE) tests in relation to site layout planning for daylight and sunlight. 	<ul style="list-style-type: none"> • clarify relationship with SPDs, such as the House Extensions and External Alterations SPD • manage residents' expectations and set out clearly on what grounds something may be refused • make it clear that loss of outlook is not necessarily a reason for refusal on its own • clearer information in relation to BRE tests (e.g. where they are measured from etc.) • make it clear that the BRE tests have to be used and only when the calculations show that a proposal fails the test, then a refusal can be considered on daylighting grounds • updated BRE references where appropriate • clarify that the 20 metres referred to in the policy is accepted as the distance that will not result in unreasonable overlooking • make it clear that overlooking gardens is not necessarily a problem and would not lead to a refusal • consider referring to the Evening Economy policy (DM TC 5) in relation to managing impacts
<p>DM DC 6 Balconies and Upper Floor Terraces</p>	<p>No specific national guidance although para 17 refers to securing a good standard of amenity for existing and future occupants.</p>	<p>The draft interim Mayor of London Housing SPG (2015) provides details on requirements for private open space, including minimum depth and width for all balconies.</p>	<p>Adding balconies to existing developments is generally unacceptable on neighbourliness and privacy grounds, whereas new builds with purpose built, well designed and positioned balconies or terraces can add valuable private open space to residential units are on upper floors.</p>	<ul style="list-style-type: none"> • Consider distinguishing in the policy between: <ul style="list-style-type: none"> - existing developments: adding balconies retrospectively is usually unacceptable due to unneighbourliness and loss of privacy grounds; and - new build: requirements for private open space, particularly on upper floors • Explore opportunities to consolidated with other policies: <ul style="list-style-type: none"> - adding balconies to existing development could be considered as part of DM DC 5 (neighbourliness) - requirements for balconies for new builds could be incorporated within housing policies (e.g. DM HO 4).
<p>DM DC 7 Shop fronts and shop signs</p>	<p>No specific national guidance although some guidance on design quality may apply</p>	<p>No specific regional guidance</p>	<ul style="list-style-type: none"> • Need to ensure shop fronts are of high architectural quality that contribute to the character and appearance of the local area • Need to retain shop fronts that have an important historic interest Shopfronts SPD (2010) • Village Plan SPD - Kew (2014) • Village Plan SPD - Whitton and Heathfield (2014) 	<ul style="list-style-type: none"> • The policy is considered to be in line with national guidance. • Explore opportunities to consolidate with other policies, such as design quality, which could have a section on shop fronts and shop signs, also referring applicants to the relevant SPD.
<p>DM DC 8 Advertisements and Hoardings</p>	<p>The NPPF (para 67) states that control over outdoor advertisements should be efficient, effective and simple in concept and operation. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.</p> <p>The PPG contains detailed guidance on advertisements:</p> <ol style="list-style-type: none"> 1. Definition of an advertisement 	<p>No specific regional guidance</p>	<ul style="list-style-type: none"> • Need to protect character of buildings, streets and local areas from hoardings and other advertisements that could demonstrably harm the local amenity, public and highway safety. • Village Plan SPD - Kew (2014) • Village Plan SPD - Whitton and Heathfield (2014) • Shopfronts SPD (2010) 	<ul style="list-style-type: none"> • The policy is considered to be in line with national guidance. • Explore opportunities to consolidate with other policies, such as design quality, which could have a section on advertisements and hoardings. • Consider whether a detailed local policy is required, particularly in the light of the detailed national guidance, including what the considerations are affecting public safety and amenity, and what matters are planning considerations.

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Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Rationale and scope for review
	<p>2. Requirements for consent</p> <p>3. Applications for express consent – procedure</p> <p>4. Applications for express consent – determination, appeals, modification and revocation</p> <p>5. Additional restrictions on the display of advertisements</p> <p>6. Enforcement against specific unauthorised advertisements</p> <p>7. Considerations affecting public safety</p> <p>8. Considerations affecting amenity</p>			
DM DC 9 Planning Application Checklist	<p>Para 193 of the NPPF states that local planning authorities should publish a list of their information requirements for applications, which should be proportionate to the nature and scale of development proposals and reviewed on a frequent basis.</p> <p>The PPG sets out guidance on local validation requirements. Information requested with a particular planning application must meet the statutory tests as set out in section 62 (4A) of the Town and Country Planning Act 1990 (inserted by the Growth and Infrastructure Act) and article 11(3)(c) of the Town and Country Planning (Development Management Procedure) (England) (Order) 2015.</p>	No specific regional guidance	The Council adopted a Local Validation Checklist in April 2015, with amendments made in September 2015.	It is considered that a policy is not required as the local planning authority can publish a local list in line with the NPPF and the relevant statutory tests without the need of a policy in the Local Plan.
Tele-communications	Chapter 5 of the NPPF (i.e. paras 42-46) relate to supporting high quality communications infrastructure	No specific regional guidance	The majority of works relating to the installation, alteration or replacement of telecommunications infrastructure in this borough is carried out under permitted development rights.	Consider adding a reference to the adopted Telecommunications SPD within the Design Quality and possibly within the proposed new policy relating to the protection of the quality of the local environment and living conditions.
CP8 Town and Local Centres	<p>This policy is considered to be in general conformity with the NPPF.</p> <p>See NPPF core planning principles (paras 17 – 19) as well as paras 23-27. In particular para 26 relates to impact assessments and allows for the introduction of a locally set floorspace threshold.</p>	<p>London Plan key policies 2.15 & 2.16, including para 2.75 set out network of centres with designations for 5 main centres in the borough, and identifies Richmond as potential Outer London Development Centre for leisure, tourism, arts, culture and sports .</p> <p>Policy 4.6 relates to the support for and enhancement of arts, culture, sport and entertainment.</p> <p>Policy 4.7 covers retail and town centre development; it states that the scale of</p>	<p>NLP Retail Study (and Appendices) (2014):</p> <ul style="list-style-type: none"> need for modest growth in retail floorspace over the plan period, much of which is to be focussed in Richmond town centre anticipated growth in floorspace in the food & drink sector <p>Town Centre Health Checks (2013):</p> <ul style="list-style-type: none"> generally healthy town centres Richmond in particular retains a strong demand for retail 	<p>Overall the policy is in line with national and regional guidance.</p> <p>The evidence suggests there is a need to retain the current policy framework and approach to accommodate forecast for modest growth in retail floorspace.</p> <p>The following updates to the policy could be considered:</p> <ul style="list-style-type: none"> include references to the NPPF sequential and impact

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Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Rationale and scope for review
	<p>PPG on ensuring the Vitality of Town Centres includes details on impact and sequential tests</p>	<p>development should relate to size and function of the centre and includes guidance on sequential and impact tests. Policy 4.8 relates to supporting the retail sector.</p> <p>Town Centre's SPG (2014)</p> <p>London-wide evidence and research:</p> <ul style="list-style-type: none"> Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (2013) London Town Centre Health Check Analysis Report (2014) Accommodating Growth in Town Centres (2014) London Small Shops Study and Addendum (2010) 	<p>Authority's Monitoring Report:</p> <ul style="list-style-type: none"> Council's Annual Town Centre Land Use Survey <p>Other research:</p> <ul style="list-style-type: none"> Distribution of Convenience Provision (good spread of food shopping across the borough and most residents have access to it within walking distance) Analysis of town & Local Centres <p>The spatial strategy whose aim is to steer major development into the 5 main town centres remains relevant. Development elsewhere in the town centre will be appropriate to the scale and function of the centre.</p> <p>There is a need to consider a locally set threshold (in line with guidance set out in the PPG) that is appropriate for this borough to be able to assess the impacts of a proposal on existing, committed and planned investments in a centre/centres within the catchment area and to ensure the impacts of a proposal on a centre's vitality and viability are understood.</p> <p>There is a need to expand the hierarchy of centres table by including a list of the local parades of importance (it should be noted that these are local parades of importance to the local people and communities; they are not small parades of shops of purely neighbourhood significance, which are, in line with the NPPF Annex 2, excluded from the town centres definition).</p>	<p>tests as well as to the Village Plan SPDs</p> <ul style="list-style-type: none"> consider a locally set threshold triggering requirement for relevant impact assessments to be undertaken. For example 500m2 for retail some updates in relation to the structural change in retail sector and to reflect latest research more emphasis on cultural facilities include a list of parades that are important for the local area in the hierarchy of centres table <p>Opportunities could be explored to consolidate the strategic policy with some of the more detailed policies currently in the Development Management Plan.</p>
DM TC 1 Larger Town Centres	<p>This policy is considered to be in general conformity with the NPPF.</p> <p>See NPPF core planning principles (paras 17 – 19) as well as paras 23-27.</p> <p>PPG on ensuring the Vitality of Town Centres includes details on impact and sequential tests</p>	<p>London Plan policy 2.15 sets out the role of centres in hierarchy.</p>	<p>There is a need to implement the spatial strategy by steering major development into town centres.</p> <p>See local evidence and research under CP8 above.</p>	<p>The policy on larger town centres is considered to be in general conformity with the NPPF and London Plan.</p> <p>The following updates to the policy could be considered:</p> <ul style="list-style-type: none"> include references to the NPPF sequential and impact tests as well as to the Village Plan SPDs clarify what "active frontages" are and/or consider removing references clarify where residential development is acceptable on the ground floor in town centres (where conversions may be acceptable, consider introducing a requirement for access from the front rather than the rear to allow good levels of activity and overlooking on to the public realm) <p>Opportunities could be explored to consolidate the policy on larger town centres (TC 1) with local and neighbourhood centres (TC 2).</p>
DM TC 2 Local and Neighbourhood Centres and Areas of Mixed Use	<p>This policy is considered to be in general conformity with the NPPF (paras 17-19). In particular, para 70 states that policies should ensure that established shops, facilities and services are able to develop and modernise in a way that is</p>	<p>London Plan policy 2.15 sets out the role of centres in hierarchy.</p>	<p>There is a need to manage development in smaller centres below district level.</p> <p>See local evidence and research under CP8 above.</p>	<p>The policy on local, neighbourhood centres and areas of mixed use is considered to be in general conformity with the NPPF and London Plan.</p> <p>The following updates to the policy could be considered:</p> <ul style="list-style-type: none"> Consider policy approach in relation to local parades (in conjunction with listing parades in CP8) Align policy with TC1 (larger centres) in terms of locating

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Existing local policy	NPPF and other relevant national guidance	London Plan and regional guidance / strategies	Local evidence and need	Rationale and scope for review
	sustainable, and retained for the benefit of the community.			<p>retail in/within/well-related to designated frontages, other town centre uses within area of mixed use boundaries</p> <ul style="list-style-type: none"> include references to the Village Plan SPDs <p>Opportunities could be explored to consolidate the policy on larger town centres (TC 1) with local and neighbourhood centres (TC 2).</p>
DM TC 3 Retail Frontages	<p>This policy is considered to be in general conformity with the NPPF. Para 23 relates to defining the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and sets out policies that make clear which uses will be permitted in such Locations.</p> <p>Para 70 requires the protection of valuable local services including shops.</p> <p>Para 157 states that Local Plans should identify areas where it may be necessary to limit freedom to change the use of buildings (supported by clear explanation)</p>	<p>London Plan policy 2.15 states that local authorities should include primary and secondary shopping frontages; specifically criterion d (c) of the policy states where there is surplus retail floorspace, consider scope for consolidating them, promote diversification particularly through high density, residential-led / mixed-use development and/or flexibility for non-A1 uses in secondary shopping frontage policies. In addition, para 2.72H states that when considering 'prior approvals' for conversion of individual retail units to housing, boroughs should ensure that housing provision does not compromise comprehensive town centre redevelopment; this requires consistent interpretation of 'key shopping areas' as meaning those parts of town centres defined in Local Plans as primary shopping areas, primary and secondary frontages, and neighbourhood and more local centres.</p> <p>Town Centre's SPG (2014), of particular relevance are:</p> <ul style="list-style-type: none"> para 2.2.4-5 relating to active frontages paras 2.2.21 and 2.2.22 relating to ground floor residential uses in town centres Para 3.2.8 relating to support for essential shopping (including fresh food) 	<p>NLP Retail Study (and Appendices) (2014):</p> <ul style="list-style-type: none"> need for modest growth in retail floorspace over the plan period, much of which is to be focussed in Richmond town centre anticipated growth in floorspace in the food & drink sector <p>Town Centre Health Checks (2013):</p> <ul style="list-style-type: none"> generally healthy town centres Richmond in particular retains a strong demand for retail <p>Authority's Monitoring Report:</p> <ul style="list-style-type: none"> Council's Annual Town Centre Land Use Survey <p>Other research:</p> <ul style="list-style-type: none"> Distribution of Convenience Provision (good spread of food shopping across the borough and most residents have access to it within walking distance) Analysis of town & Local Centres Authority's Monitoring Report 	<p>Overall the policy is in line with national and regional guidance, although it is noted that in this borough there are no designated primary shopping areas; however, town centre boundaries as well as primary and secondary frontages as well as areas of mixed use are identified and designated on the Proposals Map.</p> <p>The evidence suggests there is a need to retain the current policy framework and approach to accommodate forecast for modest growth in retail floorspace rather than seeking to relax control of change of use away from retail.</p> <p>The following updates, mainly to clarify existing requirements, could be considered:</p> <ul style="list-style-type: none"> add specific reference to over-concentration of takeaways and betting shops clarify which uses are acceptable to be compatible with retail function of centre, and clarify where residential development is acceptable on the ground floor in town centres consider potential impacts from new residential development in town centres/shopping parades on existing businesses to ensure their viability and operations are not restricted clarify approach to where there is an existing non-retail use in key shopping frontage clarify that marketing is required for all change of use from retail and set out what is required (consider approach to marketing outside of key shopping frontages / town centres) clarify what constitutes "key shopping areas" for the purposes of assessing prior approval notifications (A1 or A2 to residential) in line with the London Plan consider consolidating policy guidance on restricted frontages with the evening economy policy (TC 5) <p>There may also be an opportunity to review primary and secondary shopping frontage designations where this has been identified as part of the Village Plan SPDs (e.g. Barnes and Whitton).</p>
DM TC 4 Local Shops, Services and Public Houses	<p>This policy is considered to be in general conformity with the NPPF, specifically, para 70 requires the protection of valuable local services including shops.</p>	<p>London Plan policy 4.8 specifically states boroughs should maintain, manage and enhance local and neighbourhood shopping and facilities which provide local goods and services; boroughs should</p>	<p>Need to protect isolated facilities and public houses within reasonable walking distance.</p> <p>See local evidence and research under CP8 above.</p>	<p>The policy is considered to be in general conformity with the NPPF and London Plan.</p> <p>The evidence suggests that the policy should be updated:</p> <ul style="list-style-type: none"> to clarify marketing requirements and that marketing is required before other criteria are considered.

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		<p>develop policies to prevent the loss of retail and related facilities that provide essential convenience and specialist shopping or valued local community assets, including public houses, justified by robust evidence.</p> <p>Town Centre's SPG (2014), in particular paras 1.2.19-1.2.21 in relation to protecting pubs</p>		<ul style="list-style-type: none"> refer to the loss of social infrastructure policy refer to Assets of Community Value define the reasonable walking distance as 400 metres for public houses (this aligns with the criterion used for defining areas of Public Open Space deficiency).
DM TC 5 The Evening Economy	<p>This policy is considered to be in general conformity with the NPPF, specifically, para 70 requires the protection of valuable local services including shops.</p> <p>No national guidance on evening economy re over-concentration or mitigation measures.</p>	<p>London Plan policy 4.6 supports the enhancement of arts, culture, sport and entertainment. It states that boroughs should identify, manage and co-ordinate strategic and more local clusters of evening and night time entertainment activities to (1) address need, (2) provide public transport, policing and environmental services; and (3) minimise impact on other land uses taking account of the cumulative effects of night time uses and saturation levels beyond which they have unacceptable impacts on the environmental standards befitting a world city and quality of life for local residents. In addition, boroughs should manage cumulative impacts and encourage a diverse range of night time activities.</p> <p>Town Centre's SPG (2014), Section 1.2 and Appendix A</p>	<ul style="list-style-type: none"> Town Centre Health Checks (2013) covered diversity of uses and analysis of anti-social behaviour Approach of restricting uses in areas where over-concentration is already established in policy (TC 3, subsection D) Richmond Council's Licensing Policy and the designated cumulative impact zones (CIZs) for Richmond and Twickenham town centres does not fully align with planning designations Take account of and where appropriate refer to Business Improvement Districts, e.g. Twickenham town centre 	<p>The policy is considered to be in general conformity with the NPPF and London Plan.</p> <p>The policy would benefit from the following updates:</p> <ul style="list-style-type: none"> incorporate the frontages subject to specific restrictions within this policy rather than in retail frontages (TC 3) focus on cumulative impacts of these uses in areas not subject to further restriction ensure there is sufficient emphasis on consideration of impacts on residential amenity (also refer to neighbourliness policy and/or new policy on managing local environmental impacts and pollution) clarify the uses to which this policy would apply, including takeaways align as far as possible with the Council's Licensing Policy refer to Village Plan SPDs take account of and where appropriate refer to Business Improvement Districts
CP9 Twickenham Town Centre	Twickenham Town Centre AAP will not be reviewed.	N/A	N/A	N/A
Green Belt Statement	Statement to say that the Council relies on CP10, London Plan and national policy guidance with regard to Green Belt.	N/A	N/A	N/A
DM OS 2 Metropolitan Open Land	The policy guidance of paragraphs 79-92 of the NPPF on Green Belts applies equally to Metropolitan Open Land (MOL).	London Plan policy 7.17: The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.	<ul style="list-style-type: none"> Richmond has extensive designated MOL which makes up around 60% (3054 ha) of the borough's area including Richmond Park, Bushy Park, Hampton Court Palace and Kew Gardens. LBRuT Open Space Assessment Report (April 2015) Open Land Review (2006) LBRUT Infrastructure Delivery Plan (2012) Authority's Monitoring Report 	<ul style="list-style-type: none"> The policy is in line with regional guidance in the London Plan and with national guidance in the NPPF on the Green Belt. The policy allows for flexibility or exceptions where required, for example in the case of school expansion proposals on MOL. Could consider referring specifically to Green Belt within the policy (possibly changing the title) to ensure there is clarity that Green Belt and MOL are given the same level of protection, and that the same policies apply. Consider adding guidance in relation to major schemes (e.g. for regeneration proposals, social community or educational uses), where a comprehensive approach to redevelopment can be taken, that it may be acceptable to consider re-distribution of open land subject to enhancing its strategic importance, quality and other

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				<p>criteria.</p> <ul style="list-style-type: none"> Consider providing guidance and definition in relation to 'openness'
DM OS 3 Other Open Land of Townscape Importance	Planning Practice Guidance on Local Green Space Designation - a way to provide special protection against development for green areas of particular importance to local communities	Policy 7.18 Protecting Open Space and addressing deficiency	<ul style="list-style-type: none"> There are just over 160 sites designated as OOLTI in the borough. LBRuT Open Space Assessment Report (April 2015) Open Land Review (2006) LBRUT Infrastructure Delivery Plan (2012) Authority's Monitoring Report 	<ul style="list-style-type: none"> This policy is in line with national and regional guidance Some minor updates may be required
DM OS 6 Public Open Space	NPPF paras 73 and 74: Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless certain criteria are met.	<p>London Plan policy 7.18: The Mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency.</p> <p>Table 7.2 categorises types of public open space by size.</p>	<p>LBRuT Open Space Assessment Report (April 2015): There are 200 sites (527 hectares) identified in the Borough as open space provision.</p> <p>83% of all open spaces score above the thresholds set for quality, reflecting the generally excellent standard of sites.</p> <p>98% of all open spaces are assessed as being above the threshold for value, a reflection towards the importance of open space provision in providing social, environmental and health benefits.</p> <p>Anecdotal evidence suggests that requirements for open space sometimes overlap with requirements for play space.</p> <p>Authority's Monitoring Report</p>	<ul style="list-style-type: none"> This policy is in general conformity with national and regional policy Could consider updates including reference to CP17 and CP16 in order to recognise the value of Public Open Spaces (POS) to health and wellbeing and social cohesion within communities Consider improved linkage with DM OS 7 Children's and Young People's Play Facilities and provide some clarity around the different requirements for play space vs POS Consider including a threshold for public open space and clarify the requirements for on-site POS on larger sites, and clarify what 'larger sites' are Consider specific requirements for developments proposed in areas designated as deficient in POS Ensure a clear methodology is used for assessing POS requirements In relation to off-site contributions, consider making it clear that this is not just about improving and expanding facilities to accommodate the usage, but also to provide better linkages with wider network of open spaces, including walking and cycling routes Consider updates to the Proposals Map in relation to the POS and the POS deficient areas
DM OS 7 Children's and Young People's Play Facilities	Para 73: high quality open spaces and opportunities for sport and recreation make important contribution to health and well-being of communities.	<p>Policy 7.1: Places of work and leisure, streets, neighbourhoods, parks and open spaces should be designed to meet the needs of the community at all stages of people's lives, and should meet the principles of lifetime neighbourhoods</p> <p>Shaping Neighbourhoods: Play and Informal Recreation SPG (2012) - provides guidance on the appropriate level of provision for play and informal recreational space in developments based on updated child yield calculations.</p>	<p>The LBRuT Open Space Assessment Report April 2015 demonstrates that there is generally a very good spread of provision across the borough, and the majority of sites (95%) have been assessed as being of very high quality. There are no gaps in play provision in the borough as there are 44 dedicated sites with play areas, of which 42 sites rate above quality threshold.</p> <p>Planning Obligations SPD (2014) Appendix 1 sets out the methodology for calculating and assessing the child occupancy and subsequent place space requirements for a development site in this borough.</p>	<ul style="list-style-type: none"> This policy is in line with national and regional guidance and standards There are no major requirements for additional play space within the borough. Refer more specifically to the method of assessing child occupancy and calculating the amount of play space required as set out in the Planning Obligations SPD and updated London-wide SPG, also taking account of the potential range of housing (e.g. for older people and down-sizing) Consider reference to CP17 and CP16 to recognise the value of play space to health and wellbeing and social cohesion. Consider improved linkage with DM OS 6 Public Open Space and some clarity around the different requirements for play space / public open space.
DM OS 8 Sport and Recreation Facilities	NPPF paras 73 and 74: opportunities for sport and recreation make important contribution to health and well-being of communities. Existing	London Plan policy 3.19: no net loss of sports and recreation facilities, including playing fields; temporary facilities may provide the means of mitigating any loss as part of proposals for permanent re-	<p>Need to protect public and private sports grounds including playing fields and recreational areas, courts and greens as well as private open space in recreational use.</p> <p>The Borough Open Space, Sport and Recreation Needs and</p>	<p>This policy may require some updates:</p> <ul style="list-style-type: none"> Retain the special protection and presumption against the loss of playing fields, but add reference to the NPPF and Sport England's policy on assessing special circumstances.

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	<p>sports and recreational buildings and land, including playing fields, should not be built on unless certain criteria are met.</p> <p>PPG: Local planning authorities are required to consult Sport England where development affects the use of land as playing fields.</p>	<p>provision. Encourage multi-use public facilities. Provision of sports lighting where there is identified need and subject to criteria.</p>	<p>Opportunities Assessments set out the strategy for the borough's sport facilities, open spaces, recreational facilities, playing pitches, playing fields and play space up to 2025:</p> <ul style="list-style-type: none"> • Playing Pitch Strategy May 2015 • Playing Pitch Strategy Assessment Report May 2015 • LBRuT Indoor Sports Facility Needs Assessment May 2015 • LBRuT Open Space Assessment Report April 2015 <p>LBRUT Infrastructure Delivery Plan (2012) assesses future need for different types of infrastructure, including sport and recreation facilities. IDP will need to be updated to take account of Playing Pitch Strategy and Indoor Sports Facility Needs Assessment.</p> <p>The Planning Obligations SPD (2014) sets out requirements for provision of open space</p>	<ul style="list-style-type: none"> • Include reference to the Borough's Open Space, Sport and Recreation Needs and Opportunities Assessments 2015, particularly the Playing Pitch Strategy; also take account of investing in local economy, leisure activities/facilities that benefit local communities. • Cross-refer to need for tackling health issues such as obesity, promoting physical activity and isolation, developing stronger links between health and sports development programmes, encouraging healthier lifestyles and habits and increasing levels of physical activity. This should not only apply to young people but for all ages, including older people
DM OS 9 Floodlighting	No specific national guidance	<p>London Plan policy 3.19: Provision of sports lighting should be supported in areas where there is an identified need for sports facilities to increase sports participation opportunities, unless the sports lighting gives rise to demonstrable harm to local community or biodiversity.</p>	<p>Need to ensure there is no demonstrable harm to biodiversity, residential amenity or local character; need for policy criteria to enable applicants/officers to consider the benefits and impacts of floodlighting provision.</p> <p>The LBRuT Playing Pitch Strategy May 2015 identifies the need for floodlighting to maximise winter play for tennis and to meet demand for training provision for rugby, in appropriate locations and in accordance with DMP policies. Specific floodlighting requirements have been identified on the second pitch at Teddington Sports Centre for growing hockey demand and on the artificial grass pitch at Orleans Park School.</p>	<ul style="list-style-type: none"> • This policy is in line with regional policy and will only require minor updates, such as reference to the Council's Playing Pitch Strategy. • Consider adding an additional criterion to the policy to allow the Council to assess whether a proposal for floodlighting would meet identified needs as set out within the Council's Playing Pitch Strategy (2015).
DM OS 10 Allotments and other food growing spaces	No specific national guidance	<p>London Plan policy 7.22: Boroughs should protect existing allotments and identify other potential spaces that could be used for commercial food production or for community gardening.</p>	<p>LBRuT Open Space Assessment Report (April 2015) - There are 24 allotment sites in the Borough (28.22 hectares). This meets the recommended standard of The National Society of Allotment and Leisure Gardeners (NSALG). However long waiting lists (approx. 5 years) and much unmet demand for allotment spaces remain across the borough.</p>	<ul style="list-style-type: none"> • Policy is in line with regional guidance. • In recognition that the provision of land for food growing will have many benefits including promoting more active lifestyles, healthier diets and social benefits, the approach to safeguard all allotment sites could be continued • Consider referencing the fact that allotments would be considered an appropriate use in MOL (by referring to the MOL policy)
CP11 River Thames Corridor	<p>Policy is considered to be in line with national guidance although it is noted that there is no specific guidance or policies that would apply to the river corridors.</p>	<p>Policy is in general conformity with London Plan Blue Ribbon Network policies 7.24 – 7.30; in particular policy 7.29 River Thames.</p> <p>All London Green Grid SPG (2012)</p> <p>Arcadian Thames Area Framework – All London Green Grid (2012)</p>	<ul style="list-style-type: none"> • Need to protect and enhance the natural and built environment and unique historic landscape of the River Thames corridor (as designated in the Proposals Map as Thames Policy Area), including its biodiversity and access to the river. • Need to protect and encourage river related industries. • Need to take account of the relevant strategies relating to the River Thames: <ul style="list-style-type: none"> - Thames Landscape Strategy (2012) - Thames Strategy – Kew to Chelsea • Need to ensure that the aims and guidance from the Water Framework Directive is reflected in the policy. • Need to balance the requirements to provide access to and alongside the river whilst at the same time protecting its biodiversity. 	<ul style="list-style-type: none"> • Whilst overall the policy is in line with national and regional guidance, the evidence suggests that the policy needs to be updated in relation to: <ul style="list-style-type: none"> - the relevant Thames Strategies - the balance needed to consider the potentially conflicting aims of increasing/improving access whilst at the same time protecting and enhancing the river's biodiversity - the Environment Agency's buffer zones - the requirements for a public footpath alongside, including access to, the River Thames - the Water Framework Directive • Explore opportunities to consolidate the River Thames Corridor policy and River Crane Corridor policy; if a new

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			<ul style="list-style-type: none"> • Need to ensure that Environment Agency's buffer zones are clearly reflected in the policy. • Need to be specific in relation to the provision of access to and alongside the river, and make it clear whether access is required for the general public or for the Environment Agency for maintenance. • Need to ensure that the requirement for a public footpath alongside the River Thames, including access to it, is clearly set out in the policy. 	<p>green infrastructure policy is developed, there could be further streamlining whilst retaining all existing policy approaches.</p>
DM OS 11 Thames Policy Area	No specific national guidance	Policy is in general conformity with London Plan Blue Ribbon Network policies 7.24 – 7.30, in particular policy 7.29 relating to the River Thames and the Thames Policy Area, which states that development within this area should be consistent with the published Thames Strategy for the particular stretch of river concerned. Actions and planning priorities as identified in the Thames Strategies should be reflected in the borough's plans.	<ul style="list-style-type: none"> • Need to identify the Thames Policy Area in line with regional policy guidance. • Need to ensure development protects and enhance the special character of the River Thames as set out in the: <ul style="list-style-type: none"> - Thames Landscape Strategy (2012) - Thames Strategy – Kew to Chelsea • There is no specific need to provide detailed design guidance for the Thames Policy Area. 	<ul style="list-style-type: none"> • Explore opportunities for consolidating guidance contained within this policy with the design policies as well as with other River Thames policies whilst retaining the existing policy approach relating to the Thames Policy Area. • Need to reflect the latest versions of the Thames strategies
DM OS 12 Riverside Uses	No specific national guidance	Policy is in general conformity with London Plan Policy 7.27 Blue Ribbon Network – supporting infrastructure and recreational use, which states that development proposals that result in the loss of existing facilities for waterborne sport and leisure should be refused, unless suitable replacement facilities are provided.	<ul style="list-style-type: none"> • Assessment of Boatyard Facilities on the River Thames (2007) • Need to protect river-dependent and river-related uses, including river-related industry (B2) and locally important wharves, boat building sheds and boatyards and other riverside facilities such as slipways, docks, jetties, piers and stairs. 	<ul style="list-style-type: none"> • Some minor updates may be required such as clarifying what river-related and river-dependent uses are and references to the employment policies. • Explore opportunities to consolidate policy guidance in relation to the River Thames whilst ensuring that all existing guidance and policy approaches are retained. • Could strengthen the need to protect wharves and safeguard them for the shipment of freight, including waste and aggregates, could be incorporated.
DM OS 13 Moorings and Floating Structures	No specific national guidance	Policy is in general conformity with London Plan Blue Ribbon Network policies 7.24 – 7.30, in particular with Policy 7.27 Blue Ribbon Network – supporting infrastructure and recreational use, which states that the Blue Ribbon Network should not be used as an extension of the developable land in London nor should parts of it be a continuous line of moored craft.	<ul style="list-style-type: none"> • Assessment of Boatyard Facilities on the River Thames (2007) • Need to ensure any proposals for houseboats, moorings and other floating structures safeguard the character and openness of the River Thames. • Need to strengthen policy in relation to definitions for houseboats, residential moorings, temporary and permanent moorings. • Note that the London Borough of Richmond has introduced a new bye-law that came into effect on 13 March 2015 	<ul style="list-style-type: none"> • The evidence suggests that some updates are needed in relation to: <ul style="list-style-type: none"> - providing definitions for houseboats, residential moorings, temporary and permanent moorings - managing expectations in terms of residential moorings • Explore opportunities to consolidate policy guidance in relation to the River Thames whilst ensuring that all existing guidance and policy approaches are retained.
CP12 River Crane Corridor	Policy is considered to be in line with national guidance although it is noted that there is no specific guidance or policies that would apply to the river corridors.	Policy is in general conformity with London Plan Blue Ribbon Network policies 7.24 – 7.30; in particular policy 7.29 River Thames. All London Green Grid SPG (2012) River Colne and Crane Area Framework – All London Green Grid (2012)	<ul style="list-style-type: none"> • Need to protect and improve the Crane corridor (currently designated as “River Crane Area of Opportunity” within the Proposals Map), including its biodiversity and access to the river. • Need to balance the requirement to provide access to the river whilst protecting its biodiversity at the same time. • Need to be specific in relation to the provision of access to and alongside the river, and make it clear whether access is required for the general public or for the Environment Agency for maintenance. • Need to ensure that developments within the Crane Valley area and adjacent to River Crane to contribute to 	<ul style="list-style-type: none"> • The evidence suggests that the policy needs to be updated in relation to: <ul style="list-style-type: none"> - the need to protect, improve and enhance the River Crane corridor - review the “River Crane Area of Opportunity” designation, particularly in light of the ‘opportunity areas’ identified in the London Plan; - the status and progress on the development sites to which the policy and the Crane Valley SPG relate to; - the balance needed to consider the potentially conflicting aims of increasing/improving access whilst at the same time improving the river’s

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			<p>environmental improvements.</p> <ul style="list-style-type: none"> • Need to ensure that the aims and guidance from the Water Framework Directive is reflected in the policy. • Need to ensure that Environment Agency's buffer zones are clearly reflected in the policy. • Crane Valley Planning Guidelines SPG (2005) 	<p>biodiversity</p> <ul style="list-style-type: none"> - the Environment Agency's buffer zones - the Water Framework Directive <ul style="list-style-type: none"> • Explore opportunities to consolidate the River Thames Corridor policy and River Crane Corridor policy; if there will be a new green infrastructure policy, there could be further streamlining whilst retaining all existing policy approaches.
CP5 – Sustainable Travel 5.A Reduce the need for travel and focus on network of town centres	The policy is considered to be in line with national guidance (NPPF, para 38), which states that high transport generating development should be in sustainable locations.	The policy is considered to be in line with the London Plan (Policy 6.1), which encourages patterns and nodes of development that reduce the need to travel, especially by car, and which supports development that generates high levels of trips at locations with high PTAL.	<ul style="list-style-type: none"> • LBRuT Local Implementation Plan for Transport (LIP) sets out local and borough wide programme of measures and schemes, and provides transport context for borough • LBRUT Infrastructure Delivery Plan (2012) (IDP) provides an analysis of existing infrastructure provision and identifies any existing shortfalls, future requirements and an indication of potential costs and funding sources • Need for higher trip generating development to be located within areas easily accessible to transport opportunities other than the private car. • Authority's Monitoring Report 	<p>The policy approach of requiring high trip generating developments to be located within town centres and in areas well served by public transport is consistent with the NPPF and London Plan.</p> <p>Some minor updates may be required to reflect any changes in national/regional guidance and local evidence in line with policies CP 8 and CP 19.</p>
DM TP 1 Matching Development to Transport Capacity	The policy is considered to be in line with national guidance (NPPF, para 38), which states that high transport generating development should be in sustainable locations, where the need to travel will be minimised.	The Policy is considered to be in line with the London Plan (Policy 6.1), which supports development that generates high level of trips at locations with high levels of public transport accessibility and/or capacity. In addition, policy 6.3 requires developments to be phased where there are no firm plans for an increase in capacity to cater for the development. The cumulative impacts of development on transport requirements must be taken into account.	<ul style="list-style-type: none"> • LBRuT Local Implementation Plan for Transport (LIP) sets out local and borough wide programme of measures and schemes, and provides transport context for borough • LBRUT Infrastructure Delivery Plan (2012) (IDP) provides an analysis of existing infrastructure provision and identifies any existing shortfalls, future requirements and an indication of potential costs and funding sources • Need for higher trip generating development to be located within areas easily accessible transport other than the private car. 	<p>Whilst overall the policy appears to be in line with the NPPF and London Plan, there is a need to make the policy clearer to assist implementation such as by clarifying what is meant by 'higher trip generating' and which PTALs are considered to be "easily accessible" by public transport.</p> <p>Opportunities should be explored for consolidating the detailed transport policy with the strategic policy, particularly as it largely reflects the approach set out in CP5.A.</p>
DM TP 2 Transport and New Development	The policy is considered to be in line with national guidance (NPPF, paras 32 and 36), which states that developments should be supported by a Transport Assessment or Statement, and that a Travel Plan is required for developments who generate a significant amount of movement.	The policy is in line with London Plan Policy 6.3 which states that development proposals should ensure that impacts on transport capacity and the transport network, at both corridor and local level, are fully assessed.	<ul style="list-style-type: none"> • LBRuT Local Implementation Plan for Transport (LIP) sets out local and borough wide programme of measures and schemes, and provides transport context for borough • LBRUT Infrastructure Delivery Plan (2012) (IDP) provides an analysis of existing infrastructure provision and identifies any existing shortfalls, future requirements and an indication of potential costs and funding sources <p>There is a need to set out requirements for assessing potential impacts of new development on the transport network by requiring:</p> <ul style="list-style-type: none"> • Transport Assessments for major developments • Transport Statements for smaller developments <p>These requirements are also set out in the Local Validation Checklist (2015).</p>	<p>Whilst overall the policy is in line with the NPPF and London Plan, opportunities should be explored for consolidating the detailed transport policy with the strategic policy (specifically CP5.G), particularly as the specific requirements are already set out in the Local Validation Checklist.</p> <p>Detailed guidance, such as in relation to Travel Plans, Construction Logistics Plans and Servicing and Delivery Plans could be included in the forthcoming Transport Standards SPD.</p>
CP5 – Sustainable Travel 5.B Land for transport	This policy is in line with the NPPF (paras 31 and 41), which state that routes that are critical in developing infrastructure to widen transport choice should be protected, and authorities should work with neighbouring	London Plan (Policy 6.1) sets out strategic schemes and proposals for London; of relevance to Richmond Borough are: <ul style="list-style-type: none"> • Crossrail 2, London Overground, Southwest London Ten-car capability • Bus network development and bus stop accessibility programme 	<ul style="list-style-type: none"> • LBRuT Local Implementation Plan for Transport (LIP) sets out local and borough wide programme of measures and schemes, and provides transport context for borough • LBRUT Infrastructure Delivery Plan (2012) (IDP) provides an analysis of existing infrastructure provision and identifies any existing shortfalls, future requirements and an indication of potential costs and funding sources 	<p>This policy approach is in line with the NPPF and London Plan but some amendments are required such as removing references to the 'Parallel Initiatives Programme'.</p> <p>Strategic, such as regional infrastructure projects, could be signposted within the policy, either by referring to the London Plan and/or listing locally specific projects within the</p>

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	boroughs on infrastructure such as rail freight interchanges.	<ul style="list-style-type: none"> • Cycling: Quietways, Greenways, Biking Boroughs, Mini-Hollands, Cycle Superhubs at rail and tube stations, Cycle to School partnerships, Cycle Parking • Enhanced urban realm and pedestrian environment • Enhanced safety features improving safety for all road users including the implementation of Dutch style roundabouts, early start traffic signal technology etc. <p>London Plan (Policy 6.2) requires the provision of sufficient land for the development of an expanded transport system and development proposals that do not provide adequate safeguarding should be refused.</p>	<ul style="list-style-type: none"> • Need to ensure that sufficient and suitably located land is provided in the borough for schemes mentioned within London Plan policy 6.1 • Need to safeguard existing land used for transport/support functions. 	<p>implementation section of policy CP5 and/or as part of the Infrastructure Delivery Plan.</p> <p>Could also consider expanding policy to cover the need to retain local filling stations/commercial sites, e.g. car repairs.</p>
CP5 – Sustainable Travel 5.C Cycling and Walking	The NPPF (para 35) states that plans should protect and exploit opportunities for the use of sustainable modes of transport, including giving priority to pedestrian and cycle movements.	<p>London Plan policy 6.9 (Cycling) sets out specific requirements for developments to provide secure, convenient and accessible cycle parking facilities in line with London Plan standards or higher, provide on-site changing facilities and showers for cyclists, contribute positively to an integrated cycling network through infrastructure provision and facilitate the Mayor’s Cycle Hire scheme; this also includes identifying, promoting and facilitating the completion of cycle routes.</p> <p>London Plan policy 6.10 (Walking) requires boroughs to maintain and promote the Walk London Network, identify / implement routes to town centres, transport nodes, promote Legible London, ensure developments improve pedestrian amenity and encourage a higher quality pedestrian environment, including use of shared space principles.</p>	<p>Richmond borough has one of the highest modal shares for cycling in outer London, so it is important that borough policy continues to support cycling</p> <p>A Richmond Cycling Strategy is currently being drafted, which will include the proposed network of cycle routes.</p> <p>The Borough’s current cycle parking standards vary in comparison to the London Plan standards – some exceed, some fall below so there is a need to rationalise these.</p> <p>The London Cycle Hire Scheme has not yet reached Richmond, but this may be expanded in future, so the policy needs to be sufficiently flexible in this regard.</p> <p>There are three Walk London routes running through the borough – the Thames Path, the Capital Ring and the London Outer Orbital Path (LOOP). Where appropriate, improvements and contributions from developments could be sought.</p> <p>LBRuT Local Implementation Plan for Transport (LIP)</p> <p>LBRUT Infrastructure Delivery Plan (2012) (IDP)</p>	<p>Whilst overall the policy is in line with the NPPF and London Plan, opportunities should be explored for consolidating the detailed transport policies on walking and cycling with the strategic policy, particularly as it largely reflects the guidance within CP5.C.</p> <p>The policy could be updated to:</p> <ul style="list-style-type: none"> • bring together the highest cycle parking standards from the existing borough policy and those from the London Plan to ensure general conformity on cycle parking standards • support the investigation of opportunities for foot-/cycle bridges across the River Thames, such as between Ham and Twickenham • include reference to the Borough’s forthcoming Cycling Strategy and the proposed network of cycle routes, with the expectation that developments support and facilitate the delivery of these routes where appropriate
DM TP 6 Walking and the Pedestrian Environment	The NPPF (para 35) states that plans should protect and exploit opportunities for the use of sustainable modes of transport, including giving priority to pedestrian and cycle movements.	London Plan policy 6.10 (Walking) requires boroughs to maintain and promote the Walk London Network, identify / implement routes to town centres, transport nodes, promote Legible London, ensure developments improve pedestrian amenity and encourage a higher quality pedestrian environment, including use of shared space principles.	<p>There are three Walk London routes running through the borough – the Thames Path, the Capital Ring and the London Outer Orbital Path (LOOP). Where appropriate, improvements and contributions from developments could be sought.</p> <p>LBRuT Local Implementation Plan for Transport (LIP)</p> <p>LBRUT Infrastructure Delivery Plan (2012) (IDP)</p>	<p>Whilst overall the policy is in line with the NPPF and London Plan, opportunities should be explored for consolidating the detailed transport policy on walking and cycling with the strategic policy, particularly as it largely reflects the guidance within CP5.C.</p> <p>The policy could be updated to:</p> <ul style="list-style-type: none"> • support the investigation of opportunities for foot-/cycle bridges across the River Thames, such as between Ham and Twickenham • refer to the three Walk London routes and where appropriate, developments could contribute to

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DM TP 7 Cycling	The NPPF (para 35) states that plans should protect and exploit opportunities for the use of sustainable modes of transport, including giving priority to pedestrian and cycle movements.	London Plan policy 6.9 (Cycling) sets out specific requirements for developments to provide secure, convenient and accessible cycle parking facilities in line with London Plan standards or higher, provide on-site changing facilities and showers for cyclists, contribute positively to an integrated cycling network through infrastructure provision and facilitate the Mayor's Cycle Hire scheme; this also includes identifying, promoting and facilitating the completion of cycle routes.	<p>Richmond borough has one of the highest modal shares for cycling in outer London, so it is important that borough policy continues to support cycling</p> <p>A Richmond Cycling Strategy is currently being drafted, which will include the proposed network of cycle routes.</p> <p>The Borough's current cycle parking standards vary in comparison to the London Plan standards – some exceed, some fall below so there is a need to rationalise these.</p> <p>The London Cycle Hire Scheme has not yet reached Richmond, but this may be expanded in future, so the policy needs to be sufficiently flexible in this regard.</p> <p>LBRuT Local Implementation Plan for Transport (LIP)</p> <p>LBRUT Infrastructure Delivery Plan (2012) (IDP)</p>	<p>improvements</p> <p>Whilst overall the policy is in line with the NPPF and London Plan, opportunities should be explored for consolidating the detailed transport policy on walking and cycling with the strategic policy, particularly as it largely reflects the guidance within CP5.C.</p> <p>There may also be opportunities for consolidating cycle parking standards with off-street parking standards as set out in policy TP 8.</p> <p>The policy could be updated to reflect CP5.C updates as set out above, and:</p> <ul style="list-style-type: none"> consider the need for scooter parking for schools Further details and guidance, such as securing covered and safe cycle parking, on-site changing and shower facilities, could be incorporated in the forthcoming Transport Standards SPD
CP5 – Sustainable Travel 5.D Public Transport	The NPPF (para 35) states that plans should protect and exploit opportunities for the use of sustainable modes of transport.	London Plan policy 6.7 promotes public transport, other sustainable means of transport and step-free access; boroughs should also promote bus and bus transit networks	<p>There is a need to encourage and support the provision and use of sustainable modes of transport where possible.</p> <p>LBRuT Local Implementation Plan for Transport (LIP)</p> <p>LBRUT Infrastructure Delivery Plan (2012) (IDP)</p>	<p>This policy is in line with the NPPF and London Plan. Whilst the provision of public transport is generally not within the control of the planning system and as the Council relies on Transport for London, bus companies, Network Rail and other partners for their delivery, some policy updates could be considered such as:</p> <ul style="list-style-type: none"> removing reference to the bus services within the River Crane Corridor and if appropriate adding references to improved bus stops adding references to minimising downtime at level crossings and managing impacts; this could also be part of the implementation plan for this policy (including references to the Local Implementation Plan for Transport) <p>Opportunities for consolidating policies relating to sustainable modes of transport, including access to public transport, enhancing transport links and improving interchange facilities, should be explored.</p>
DM TP 3 Enhancing Transport Links	This policy is in line with the NPPF (paras 29, 32 and 35), which states that transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how to travel; giving general support to developments that encourage sustainable transport modes, and ensuring plans protect and exploit opportunities for the use of sustainable modes of transport.	London Plan policy 6.4 focuses on efficient and effective cross-boundary transport services, orbital rail links to support future development and regeneration, including strategic schemes such as High Speed, Crossrail, London Overground, Southwest Trains), improved access to Heathrow Airport from south London of relevance. It also states that local plans should identify development opportunities related to locations which will benefit from increased public transport accessibility.	<p>There is a need for new developments to create or improve links to the wider transport network where appropriate as well as permeability through a site.</p> <p>Need to refer to the requirement for developments adjoining the River Thames to provide a public riverside walk (see River Thames policies).</p> <p>Need to ensure that new developments are not gated (also see Design policies).</p> <p>LBRuT Local Implementation Plan for Transport (LIP)</p> <p>LBRUT Infrastructure Delivery Plan (2012) (IDP)</p>	<p>Whilst overall the policy is in line with the NPPF and London Plan, opportunities should be explored for consolidating the detailed transport policies relating to enhancing transport links and improving interchange facilities with the strategic policy, particularly as it largely reflects the guidance within CP5.D.</p> <p>Policy guidance on the public riverside walk adjoining the River Thames and on gated developments can be consolidated with the River Thames and Design policies respectively.</p>
DM TP 4 Integration of	No specific national guidance	London Plan policy 6.1 focuses on improving interchange, particularly around	Need to ensure that developments improve the quality and connectivity of transport interchanges.	Whilst overall the policy is in line with higher level policy guidance, opportunities should be explored for consolidating

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different types of Transport and Interchange Facilities		major rail and underground stations, especially enhancing connectivity in Outer London.	LBRuT Local Implementation Plan for Transport (LIP) LBRUT Infrastructure Delivery Plan (2012) (IDP)	the detailed transport policies relating to enhancing transport links and improving interchange facilities with the strategic policy, particularly as it largely reflects the guidance within CP5.D.
DM TP 5 Taxis and Private Hire Vehicles	No specific national guidance	No specific guidance in London Plan. The Mayor's Transport Strategy (2010) states that the Mayor will work with boroughs to support improvements to the taxi service.	The current policy largely focuses on the design, location and accessibility of taxi ranks including impacts on pedestrian movement and road safety.	The evidence and feedback from those implementing the policies suggests that there is not necessarily a need for this policy and therefore opportunities should be explored for consolidating the detailed transport policy on taxi/private hire vehicles with the strategic policy.
CP5 – Sustainable Travel 5.E Congestion and Pollution	This policy is in line with para 30 of the NPPF, which encourages solutions that support reductions in greenhouse gas emissions and reductions in congestion.	London Plan policy 6.11 states that local plans and Local Implementation Plans (Transport) should take a coordinated approach to smoothing traffic flow and tackling congestion through implementation of the recommendations of the Roads Task Force report and a range of measures such as improvements to walking, cycling and public transport, travel planning advice, car sharing, more efficient freight movements.	There is a need to manage traffic impacts leading to congestion and pollution, particularly as the whole of the borough is a designated Air Quality Management Area.	Whilst overall the policy is in line with the NPPF and London Plan, opportunities should be explored for consolidating the strategic policy on transport. The planning system only provides limited opportunities to manage congestion and pollution, but the strategic policy could be updated with regard to: <ul style="list-style-type: none"> publicly accessible electric vehicle (EV) charging points (whereby London Plan standards would apply); supporting alternatively fuelled vehicles; managing freight and servicing; and removing specific references to Richmond town centre.
CP5 – Sustainable Travel CP5.F Car Parking and travel	National guidance states that boroughs should only impose local parking standards where there is a clear and compelling justification to manage the local road network (see NPPF paras 39 and 40, including the Ministerial statement (March 2015)).	London Plan policy 6.13. Outer London Commission (2015): Residential Parking Standards recommendations: <ul style="list-style-type: none"> greater flexibility to outer London PTALs 0-1 greater flexibility for limited parts of PTAL 2 based on criteria Minor Alterations to the London Plan (2015) on parking standards; taking forward the OLC recommendations	There is a need to maintain the borough's current parking standards as set out in Appendix 4 of the Development Management Plan to minimise the impacts on the local road network, street congestion and amenity. In reviewing the policy, account has to be taken of the: <ul style="list-style-type: none"> Outer London Commission's report on Residential Parking Standards Minor Alterations to the London Plan in relation to parking standards, i.e. introducing more flexibility in PTALs 0-1 and in limited parts in PTAL 2 	Whilst overall the policy is in line with the NPPF and London Plan, opportunities should be explored for consolidating the detailed policy on off-street parking and forecourt parking within the strategic policy CP5.F. The policy could be updated to: <ul style="list-style-type: none"> reinforce requirements for maximum parking standards, car share facilities and car clubs, including the use of ultra-low emission vehicles; consider approach to car free housing development in Richmond and Twickenham town centres and consider local impacts; and review current approach to parking in town and local centres to support businesses.
DM TP 8 Off Street Parking - Retention and New Provision	National guidance states that boroughs should only impose local parking standards where there is a clear and compelling justification to manage the local road network (see NPPF paras 39 and 40, including the Ministerial statement (March 2015)).	London Plan policy 6.13 sets out the London-wide maximum parking standards, promotes and encourages car sharing and car clubs, including disabled parking. It expects an appropriate balance to be struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use Outer London Commission (2015): Residential Parking Standards recommendations: <ul style="list-style-type: none"> greater flexibility to outer London PTALs 0-1 greater flexibility for limited parts of PTAL 2 based on criteria Minor Alterations to the London Plan (2015) on parking standards; taking forward the	There is a need to maintain the borough's current parking standards as set out in Appendix 4 of the Development Management Plan to minimise the impacts on the local road network, street congestion and amenity. In reviewing the policy, account has to be taken of the: <ul style="list-style-type: none"> the fact that the Borough standards, although in general conformity, differ from the London Plan standards. Evidence will need to be prepared to justify the continuation of the Borough's parking standards. Outer London Commission's report on Residential Parking Standards. Minor Alterations to the London Plan in relation to parking standards, i.e. introducing more flexibility in PTALs 0-1 and in limited parts in PTAL 2; including the detailed impact assessment prepared by the GLA to support the changes. 	As part of the review of the policies: <ul style="list-style-type: none"> justify the continuation of the current Borough's parking standards and general conformity with the London Plan (this was last demonstrated as part of the DMP examination in 2011); consider implications of the Minor Alterations to the London Plan on parking standards; and clarification to assist implementation including ensure it is clear what parking standards are expected for the different types of land uses in different parts of the borough; include definitions where required such as unallocated spaces, half spaces etc. and dimensions for spaces. Details could also be in the forthcoming Transport Standards SPD.

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		OLC recommendations		
DM TP 9 Forecourt Parking	No specific national guidance (general guidance on parking standards in NPPF paras 39 and 40, including within the Ministerial statement (March 2015).	No specific guidance on forecourt parking, although London Plan policy 6.13 expects an appropriate balance to be struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.	<ul style="list-style-type: none"> The policy focuses largely on design of forecourt parking. Front Garden and Other Off-Street Parking Standards SPD (2006) 	Explore opportunities to consolidate with TP 8 on parking standards, and where required consider adding design guidance to the design quality policy, including a reference to the Front Garden and Other Off-Street Parking Standards SPD.
CP5 – Sustainable Travel 5.G Sustainable travel	The NPPF puts great importance on a transport system that balances in favour of sustainable transport modes, giving people a real choice about how to travel (para 29). It also sets out (para 35) that developments should accommodate the need for deliveries, prioritise pedestrians and cyclists and access to public transport, reduce conflicts, incorporate facilities for charging plug-in and other ultra-low emission vehicles and consider the needs of those with disabilities. Requirements for Transport Assessments, Statements and Travel plans are also set out in the NPPF (paras 32 and 36).	The Policy is considered to be in line with the London Plan (Policy 6.1), which encourages patterns and nodes of development that reduce the need to travel, especially by car, seeks to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand. The Blue Ribbon Network policies, particularly 7.25 and 7.26 encourage the increasing use of the Blue Ribbon Network for passengers, tourism and for freight transport.	Need to ensure impacts of developments on the local road network are considered. LBRuT Local Implementation Plan for Transport (LIP) LBRUT Infrastructure Delivery Plan (2012) (IDP)	Whilst overall the policy is in line with the NPPF and London Plan, opportunities should be explored for consolidating the strategic policy on transport. Requirements, such as in relation to Transport Assessments, Transport Statements, Travel Plans, Construction Logistics Plans and Servicing and Delivery Plans should be clearly set out in the Local Validation Checklist, and if required detailed guidance could be included in the forthcoming Transport Standards SPD. The strategic policy could also be updated to specifically encourage river transport in line with the London Plan's Blue Ribbon Network policies for passengers, tourism and freight transport. Strengthening the need to protect wharves and safeguard them for the shipment of freight, including waste and aggregates, could be incorporated by referring to DM OS 12. There could be specific policy guidance relating to the management of freight and servicing; this could also be covered in the forthcoming Transport Standards SPD.
CP5 – Sustainable Travel 5.H Measures to minimise the impacts of Heathrow	Generic national guidance on aviation and supporting infrastructure within paras 31 and 33 of the NPPF, including the guidance within the PPG on aviation as well as the Aviation Policy Framework (2013)	The London Plan contains policy 6.6 on aviation, which also sets out that the Mayor strongly opposes any further expansion at Heathrow (mainly due to the averse noise and air quality impacts).	The Council, in line with the Mayor of London, strongly opposes any further expansion at Heathrow and supports measures to minimise the impacts, particularly on traffic and noise. <ul style="list-style-type: none"> Community Plan 2013-18 – Council resists any expansion of Heathrow Airport LBRuT Corporate Plan 2015-16 – Council is against a third runway at Heathrow in line with overwhelming verdict of local residents against Heathrow expansion in the recent referendum. 	It is acknowledged that policy CP5.H would not be applicable to assessing planning applications in this borough. There is therefore no specific identified need to include planning policy guidance on Heathrow within the Local Plan, whereby improvements to the public transport system for accessing Heathrow could be considered as part of the strategic transport policy (e.g. CP5.B). There may also be an opportunity to refer to the impacts of Heathrow within a policy relating to the local environmental impacts and pollution.
CP13 Opportunities for all (Tackling relative disadvantage)	Policy considered to be in accordance with the NPPF which sets out requirement for using evidence base to assess locations of deprivation which may benefit from planned remedial action. NPPF para 161.	Policy considered to be in general conformity with the London Plan, as while there are no identified areas of regeneration in the borough, policies seek to tackle spatial concentrations of deprivation. Policies 3.1, 3.9 and 4.12.	The Areas of Disadvantage in the Core Strategy were identified from the Index of Multiple Deprivation 2004. This evidence was updated in 2010 and 2015. The areas identified remain fairly static, and while there are no areas in the Borough ranked in the 10% most deprived areas, there are small pockets of deprivation across the borough. The Council's Uplift programme continues, to rejuvenate the Whitton, Hampton North, Barnes, Mortlake, Ham and Fulwell and Hampton Hill areas of the Borough, which local people	Explore whether to update the policy to reflect the Village Plans, Uplift programme and current partnership working such as on transport, health projects, focusing on areas of opportunity, although to future-proof the policy, specific projects such as Uplift could also be included within the Infrastructure Delivery Plan. There may be an opportunity to consolidate the policy if local priorities, funding needs and joint working are adequately covered by other policies including CP7, CP16

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			say are in need of improvement. Heathfield is covered in Phase 2.	and CP17 and the Council's other strategies and programmes.
CP14 Housing	<p>Although delivering against London Plan target and identified five year supply, there is a need for an up to date SHMA to provide evidence in support of local policies.</p> <p>NPPF requires meeting full, objectively assessed needs for market and affordable housing in the housing market area, and to plan for a mix based on current and future demographic projections and the needs of different groups in the community.</p> <p>NPPF paras 47 to 49 and 50.</p> <p>Housing and Planning Bill proposes new duties in relation to Starter Homes and Custom and self-Build. Proposed amendments to the NPPF on housing delivery.</p>	<p>Delivering against London Plan (2015) target, which needs to be reflected in policy.</p> <p>Sets higher annual average housing supply monitoring targets 2015 – 2025 for the borough of 315 but with an expectation that this will be exceeded. Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets, including in centres with good public transport accessibility and mixed use redevelopment. Informed by London-wide SHMA and SHLAA, the development of which the Council input into.</p> <p>Policies 3.3 and 3.4.</p> <p>Inspector's Report into the Further Alterations to the London Plan found other than fine tuning regarding local need relating to the size and type of property and tenure, there is no need for each Borough to duplicate the work done by the GLA and produce their own individual assessment of overall need. However, the Inspector found that that overall the Plan's strategy will not deliver sufficient homes to meet London's objectively assessed need and recommended an immediate review of the London Plan. The Review of the London Plan is scheduled to commence in 2016, and earliest adoption is anticipated in 2019.</p>	<p>Authority's Monitoring Report</p> <p>AMR 2013/14 continued to identify sufficient five year housing land supply (a potential 1849 units over the 5 year period, which is 274 units more than the new London Plan target).</p> <p>Need for up to date SHMA (in context of London-wide SHMA) following the NPPG guidance.</p> <p>The London Plan and the London-wide SHMA treat London as a single housing market area for planning purposes. The borough level work will recognise the overlaps with other housing market areas, but will create a detailed picture of local need for the borough taking account of the borough's position with regard to broad rental market areas, house prices and affordability, travel to work and migration (both internal and international, size and age of population).</p> <p>The context of the borough and the needs of different groups in the community will have to be taken into account, including family housing, older people, students, international investment and foreign buyers. In light of the Housing and Planning Bill there will need to be an assessment in relation to Starter Homes and Custom and self-Build. The Bill also proposes removing the requirement in the Housing Act for a separate Gypsy and Traveller assessment, which can now be part of the general assessment of needs to include all people residing in or resorting to the district in caravans or houseboats.</p> <p>Village Plan consultation feedback raised in relation to options for housing choice, including opportunities for younger people to get on the housing ladder and downsizing for older people to smaller units.</p>	<p>The overall approach to housing delivery and the spatial strategy are in line with national and regional policy and guidance.</p> <p>Forthcoming national housing and planning policy changes will need to be kept under review.</p> <p>The policy will need to be updated to more accurately reflect the new London Plan target and be informed by the up to date borough SHMA. A separate paper setting the context for the borough SHMA will be published.</p> <p>The policy updates will need to set out the approach to size, type etc. and specific needs including Starter Homes, Custom and self-Build, Private Rented Sector, Gypsies and Travellers and/or brownfield sites as appropriate.</p> <p>Consider in updates how to make clearer relationships between strategic and detailed policies, including:</p> <ul style="list-style-type: none"> - making effective use of land also within CP1 and other policies, - unit size and type also within DMHO4, - inclusive access also within DMHO4 (requires updating, see details under DMHO4), - Gypsies & Travellers could be incorporated within DMHO5.
DM HO 1 Existing Housing (including conversions, reversions and non self-contained accommodation)	No specific national guidance.	Policy considered to be in accordance with resisting the loss of existing housing. Policy 3.14.	No specific local evidence, implementation through planning applications; initial research and evidence suggests that in some parts of the borough there is a loss of housing units through reversions.	Policy is in line with regional guidance. Consider detailed updates to ensure a consistent approach in consideration of planning applications. Need to consider the Council's overall approach to reversions.
DM HO 2 Infill Development	No specific national guidance.	Policy considered to be in accordance with taking into account local context and character, design principles and public transport capacity, development should optimise housing output for different types of location within the relevant density range. Policies 3.3, 3.4 and 3.5.	No specific local evidence, implementation through planning applications.	Policy is in line with regional guidance. Consider detailed updates to ensure a consistent approach in consideration of planning applications. Explore whether there is an overlap with Policy DMHO3 and other design policies, and ensure there is clarity in the type of development the policy applies to.
DM HO 3 Backland Development	Policy considered to be in accordance with the NPPF which states policies can resist	Policy considered to be in accordance, as states Boroughs may in their LDFs introduce a presumption against	No specific local evidence, implementation through planning applications. Some larger back gardens have already been identified as Other Open Land of Townscape Importance to	Policy is in line with national and regional guidance. Consider detailed updates to ensure a consistent approach in consideration of planning applications, whereby the

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	inappropriate development of residential gardens. NPPF para 53.	development on back gardens or other private residential gardens where this can be locally justified. Policy 3.5.	ensure they are protected.	presumption against the loss of back garden land will be retained. Explore whether there is an overlap with Policy DMHO2 and other design policies, and ensure there is clarity in the type of development the policy applies to.
DM HO 4 Housing Mix and Standards	Overall approach in accordance with NPPF, although needs updating to reflect national approach to space standards and inclusive access. NPPF para 17 fourth bullet secure good standard of amenity for existing and future occupants. NPPF para 57 plan for inclusive design. Optional nationally described space standard. Part M Building Regulations updated 2015.	Policy overall approach in accordance with approach to quality and design of housing developments, although needs updating to reflect approach to national space standards and inclusive access in London. Policy 3.5 Housing Standards Minor Alterations to the London Plan proposed updates to reflect nationally described space standard + encouraging minimum ceiling height, and inclusive access. Supported by London-wide need and viability evidence.	Need for up to date SHMA including needs for unit type and sizes for different tenures.	Policy is overall in line with national and regional guidance. Some changes may be needed to reflect up to date SHMA regarding unit type and size and to reflect requirement to meet national internal space standards (for all tenures). Consider detailed updates to ensure a consistent approach in consideration of planning applications, including approach to assessing external amenity space. Consider in updates how to make clearer relationships between strategic and detailed policies, including - unit size and type could be incorporated from CP14, - inclusive access could be incorporated from CP14. Inclusive access updates required to reflect national approach to inclusive access - require in policy optional Building Regulations 90% to M4(2) 'accessible and adaptable dwellings' and 10% to M4(3) 'wheelchair user dwellings'.
DM HO 5 Housing to Meet Specific Community Needs	Planning policy for traveller sites (2015) requires up to date assessment of needs. Other national changes significantly affecting housing sector and funding for Registered Providers and potential impacts e.g. on homelessness. Further details in Housing and Planning Bill.	Policy overall approach in accordance with promoting housing choice, including affordable housing, families, supported housing, older people, Private Rented Sector, student housing. The accommodation requirements of gypsies and travellers (including travelling show people) should be identified and addressed, with sites identified in line with national policy, in coordination with neighbouring boroughs and districts as appropriate. Policy 3.8	Need for up to date SHMA including assessing needs of different groups, including older people, students. Take account of housing strategies and evidence base, and Public Health and Commissioning information. Initial outcome of research on Gypsies and Travellers in 2013 and 2015 (to be published) suggests that there is no demonstrated need for additional pitches; although there is a need to protect existing pitches. Anticipated impact on homelessness due to changes in funding for Registered Providers which may increase needs including for temporary accommodation, hostels.	The policy will need to be updated informed by the up to date borough SHMA, to reflect the latest local priorities. Consider in updates how to make clearer relationships between strategic and detailed policies - Gypsies & Travellers could be incorporated from CP14.
CP15 Affordable Housing	Policy considered to be in accordance with overall approach to affordable housing. <i>See also CP14</i> regarding NPPF requirement to for up to date assessment of affordable housing needs and plan for a mix. NPPF para 50 set policies for meeting affordable housing need on site, unless off-site provision or a financial contribution can be justified. Flexible to take account of	Policy considered to be in accordance with overall approach to affordable housing, which seeks mixed and balanced communities and sets a numeric London-wide target for affordable housing delivery. The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use scheme Policies 3.9, 3.10, 3.11, 3.12 and 3.13.	Need for up to date SHMA including affordable housing needs. Need to ensure viability of policy approach. The Council's 80/20 tenure split has been justified previously (i.e. 80% rented, 20% intermediate). Council's Tenancy Strategy (2013) (and DTZ report) sets guideline rent levels. University of Cambridge research on the private rented sector (2012) identifies strong PRS need. Intermediate Housing Policy Statement sets out approach to affordability of shared ownership. Affordable Housing Investment Framework for South West London (last updated 2010) covers borough tenure mix, unit size, supported housing needs.	<ul style="list-style-type: none"> Policy is overall in line with national and regional guidance, if changes made to reflect up to date SHMA. The policy will need to be informed by the up to date borough SHMA on affordable housing target/tenure split/unit size. Ensure clear approach setting out up to date balance of quantum, tenure, size and affordability that makes the maximum reasonable policy compliant scheme, taking account of design, funding etc. Forthcoming national housing and planning policy changes will need to be kept under review; this may impact point 2 above Take account of latest position regarding availability and

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	<p>changing market conditions.</p> <p>NPPF para 173 to ensure viability the costs of requirements such as affordable housing should provide competitive returns to a willing land owner and willing developer.</p> <p>NPPF definition of Affordable rented housing. Proposed amendments to the NPPF on housing delivery.</p> <p>Other national changes significantly affecting housing sector and funding for Registered Providers and potential impacts e.g. on homelessness. Further details in Housing and Planning Bill.</p>		<p>Data from Housing Register e.g. current needs, affordability.</p> <p>Anticipated impact due to changes in funding for Registered Providers which may increase need for different intermediate type products for residents.</p> <p>AMR 2013/14 only 14% of units were delivered as affordable housing on-site against a target/aspiration of 50% as set out in the Core Strategy. Tenure split of 76% rented / 24% intermediate, which is only slightly below policy requirements.</p> <p>Financial contributions in lieu of on-site affordable housing are reported separately – see the Council's Authority Monitoring Report website.</p> <p>Local Validation Checklist (2015) requires information to satisfy affordable housing policy requirements to be submitted with an application.</p>	<p>use of public funding sources, relationship with CIL, viability, provisions for re-appraising the viability of schemes, updated Local Validation Checklist and need for public viability information. Consider in updates how to make clearer relationships between strategic and detailed policies – explore separate policy on viability (see also <i>DMHO6</i>).</p>
<p>DM HO 6 Delivering Affordable Housing</p>	<p><i>As set out above under CP15.</i></p>	<p><i>As set out above under CP15.</i></p>	<p><i>As set out above under CP15.</i></p>	<p>Policy is overall in line with national and regional guidance. Consider in updates how to make clearer relationships between strategic and detailed policies – links with CP15.</p> <p>The policy will need to be updated to reflect small site contributions %s for conversions and former employment sites as set out in the Affordable Housing SPD.</p> <p>Explore a separate policy on viability (not just affordable housing) including provisions for re-appraising the viability of schemes (claw back, overage), and need for public viability information.</p>
<p>CP16 Local Services / Infrastructure</p>	<p>Provision of social infrastructure is a key part of the 'social' dimension of sustainable development in the NPPF which is about supporting strong, vibrant and healthy communities.</p> <p>One of the core planning principles of the NPPF is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs'</p> <p>Other relevant sections of NPPF: - Section 8 Promoting Healthy</p>	<p>London Plan policy 3.16: additional and enhanced social infrastructure provision is required to meet the needs of London's growing and diverse population.</p> <p>Policy 3.18 and the Mayor's Social Infrastructure SPG (2015) advocate co-location across all social infrastructure types and particularly in relation to schools.</p> <p>HUDU Guidance on Community Infrastructure Planning</p> <p>Also London Plan policies 3.17 Health and Social Care facilities, 3.18 Education facilities and 3.19 Sports facilities.</p>	<p>LBRUT Infrastructure Delivery Plan (2012) assesses future need for different types of social infrastructure and potential funding sources.</p> <p>CIL Regulation 123 list prioritises funding for strategic transport, education facilities, community facilities, parks and open spaces projects, waste facilities, and sport and leisure provision.</p> <p>Planning obligations SPD (2014)</p> <p>Council School Place Planning Strategy (2015)</p> <p>The Borough Open Space, Sport and Recreation Needs and Opportunities Assessments set out the strategy for the borough's sport facilities, open spaces, recreational facilities, playing pitches, playing fields and play space up to 2025:</p> <ul style="list-style-type: none"> • Playing Pitch Strategy May 2015 • Playing Pitch Strategy Assessment Report May 2015 • LBRuT Indoor Sports Facility Needs Assessment May 	<ul style="list-style-type: none"> • This policy is in line with national and regional guidance. • Minor updates to wording are required (e.g. to remove reference to Circular 05/05) and to refer instead to the CIL and Regulation 123 list. • Good quality social infrastructure and community facilities are essential to people's wellbeing and to successful communities; consider updating / strengthening the policy to encourage greater provision of community infrastructure to meet current needs and shortages, i.e. borough shortage of primary, secondary and nursery school places, pressure on health facilities etc. is currently not reflected in the policy. • Consider referring to mapped evidence and needs for social infrastructure uses • Consider referring to social inclusion • Clarify that policy refers to 'community' or 'social' infrastructure uses (could also consider changing the title of the policy)

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	<p>Communities</p> <ul style="list-style-type: none"> - Para 72 on school provision - Para 73 on recreation 		<p>2015</p> <ul style="list-style-type: none"> • LBRuT Open Space Assessment Report April 2015 	
DM SI 1 Encouraging New Social Infrastructure Provision	As above (CP16); in addition NPPF para 70: plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.	<p>London Plan policy 3.16: Development proposals which provide high quality social infrastructure will be supported; Facilities should be accessible to all sections of the community; The multiple uses of premises should be encouraged.</p> <p>Mayor's Social Infrastructure SPG (2015)</p> <p>Also relevant: LP Policies 3.17, 3.18 and 3.19.</p>	<p>As above (CP16)</p> <p>There is a need to draw together the borough-wide social infrastructure needs from the various service providers (including education, health, nurseries etc.); this could also include producing and referring to an overarching map on the existing and future shortages and needs.</p>	<ul style="list-style-type: none"> • Overall the criteria-based approach is in line with national and regional policy. • Changes to this policy are likely to be minor, such as providing some clarification around co-location and dual use. • May also need to take account of any new evidence base published by the relevant service providers, such as NHS, Education etc.
DM SI 2 Loss of Existing Social Infrastructure Provision	As above (CP16); in addition NPPF para 70: guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.	<p>London Plan policy 3.16: Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted.</p> <p>Policy 3.16 para 3.87A and the Mayor's Social Infrastructure SPG (2015) explain that loss of social infrastructure in areas of defined need may be acceptable if it can be demonstrated that the disposal of assets is part of an agreed programme of social infrastructure re-provision to ensure continued delivery of social infrastructure and related services, and in doing so responds to the need to rationalise property portfolios across the public estate.</p> <p>Also relevant: LP Policies 3.17, 3.18 and 3.19.</p>	<p>As above (CP16)</p> <p>The Council has a (statutory) duty to provide for certain social infrastructure uses (e.g. education, nursery provision etc.). This includes considering the impact of the additional 15 hours free nursery care (i.e. rising to 30 hours in total) as set out in the Childcare Bill: policy statement, December 2015.</p>	<ul style="list-style-type: none"> • This policy is in line with national and regional policy and guidance and allows for some flexibility depending on the circumstances. • Could consider clarifying the application of the criteria of the policy and the requirements for considering alternative social infrastructure uses on existing / vacated sites. • Could also consider specifically referring to Assets of Community Value
CP17 Health and well being	<p>NPPF Section 8 'Promoting healthy communities' and PPG Section 8 as well as NPPF core planning principle (take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs)</p> <p>Other relevant NPPF sections include 4, 7 and 11.</p> <p>Marmot Review 'Fair Society, Healthy Lives' (2010) report – major study into tackling health inequalities.</p> <p>TCPA Guidance 'Reuniting</p>	<p>London Plan policy 3.2: New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities</p> <p>Also relevant: Policies 3.1, 3.17 and 7.1</p> <p>Social Infrastructure SPG (2015) particularly Ch5</p> <p>The London Health Inequalities Strategy (2010)</p> <p>Mayor's Best Practice Guidance on Health issues in Planning (2007)</p> <p>HUDU (London Healthy urban development unit) Guidance on 'Healthy Places and Communities' and HIA Tool</p>	<p>LBRUT Joint Strategic Needs Assessment (JSNA) 2015/16 and Joint Health and Wellbeing Strategy 2013-16.</p> <p>The Borough Open Space, Sport and Recreation Needs and Opportunities Assessments set out the strategy for the borough's sport facilities, open spaces, recreational facilities, playing pitches, playing fields and play space up to 2025:</p> <ul style="list-style-type: none"> • Playing Pitch Strategy May 2015 • Playing Pitch Strategy Assessment Report May 2015 • LBRuT Indoor Sports Facility Needs Assessment May 2015 • LBRuT Open Space Assessment Report April 2015 <p>HUDU evidence showing capacity, shortfall and needs of GP Premises across the borough (not currently publicly available):</p> <ul style="list-style-type: none"> • Teddington & Hampton : 1,220m² GIA floorspace deficiency • Richmond, Ham & Kew: 1,105m² GIA floorspace deficiency 	<p>This policy is in need of updating to address:</p> <ul style="list-style-type: none"> • the greater emphasis nationally on joint working between Planning and Public Health departments • the greater understanding of the important role that planning can play in the development of healthy communities • the national priorities such as tackling health inequalities and improving social cohesion, as well as local priorities as set out in the JSNA (e.g. ageing population, obesity etc.) <p>Also consider updating the policy in relation to:</p> <ul style="list-style-type: none"> • Requirements for Health Impact Assessments • An improved explanation of the impacts of the built and natural environment on health and wellbeing and the cross-sector nature of creating healthy communities • Refer to other areas of the local plan that play a part in promoting healthy communities and reducing health inequalities, such as policies on open and play space, social infrastructure, housing and transport.

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	<p>health with planning' (2012) report and checklist and 'Planning healthy weight environments' (2014) report</p> <p>RTPI Planning Horizons Paper 'Promoting Healthy Cities' (2014)</p> <p>Dementia Friendly Environments Checklist</p> <p>Health and Social Care Act 2012: gives boroughs an enhanced role in improving public health in their areas, i.e. Health and Wellbeing Boards, JSNA and Joint Health and Wellbeing Strategies should inform plan-making.</p> <p>NHS England and Public Health England: Healthy New Towns initiative</p>	<p>GLA Takeaways Toolkit (2012) sets out the evidence that fast food takeaways are a contributing factor in the growth of the obesogenic environment and the rise of childhood obesity and other health problems.</p>	<ul style="list-style-type: none"> • East Sheen & Barnes: 885m² GIA floorspace deficiency • Twickenham & Whitton: 750m² GIA floorspace deficiency <p>The Richmond Clinical Commissioning Group (CCG) and NHS Property Services are currently producing an Estates Strategy which will detail the primary care, community care and office space owned by NHS Richmond. This will be taken account of in the Local Plan.</p> <p>Council Local Validation Checklist (2015) requires Health Impact Assessments to be submitted for all major development proposals.</p> <p>Richmond upon Thames Community Plan 2013-2018. One of the key priorities is delivering a healthy borough.</p> <p><u>Takeaways and tackling obesity</u> The Richmond Joint Strategic Needs Assessment shows:</p> <ul style="list-style-type: none"> • 45% adults in the borough are obese or overweight; • 18.1% of children in Reception year are obese or overweight; • 24.4% in Year 6 are obese or overweight; <p>To address this concern, the planning system could be utilised to restrict access to unhealthy foods, particularly fast food takeaways (A5 uses). Such a restriction is often implemented where a concentration of fast food takeaways already exists within a certain proximity to schools, often 400m, which is considered reasonable walking distance. A 'concentration' is often considered to be more than three A5 uses.</p>	<ul style="list-style-type: none"> • Consider referring to mapped evidence and needs for health and social care facilities, including referring to CP16 • Consider specifically the needs of older people • A SPD on Healthy Communities could be considered in the future to provide information on how the environment impacts on the health and wellbeing of the population and to provide detailed guidance on the implementation of CP17. <p><u>Takeaways and tackling obesity</u> The evidence suggests there is an emerging obesity issue in the borough. In line with adopted approaches in other London boroughs, introducing a restriction on the development of further fast food takeaways in close proximity to schools where a concentration of such uses already exists could be considered to restrict access to unhealthy foods. This will be based on research and analysis, including an audit of 400m buffer zones.</p>
<p>CP18 Education and Training</p>	<p>NPPF para 72 refers to the need to make sufficient provision for a choice of school places to meet existing and new communities' needs. Great weight should be given to the need to create, expand or alter schools; and LPAs should work with schools promoters to identify and resolve key planning issues before applications are submitted.</p>	<p>London Plan policy 3.18: Local Plan to provide the framework for the regular assessment of need for pre-school, school, higher and further educations institutions and community learning facilities at local and sub-regional levels and secure sites for future provision recognising local needs and specific requirements. Support free schools and development proposals that address current and projected shortage of primary and secondary school places.</p>	<ul style="list-style-type: none"> • The Council's School Place Planning Strategy (2015) provides evidence that more school places are required to meet longer-term forecast demand, particularly in the primary phase. The most difficult school place planning area is St Margarets and North Twickenham / Twickenham Riverside where there is a need for up to three forms of entry at primary level. • The Office of National Statistics predicts that the school age population within the borough will increase from 46,000 to 55,000 by 2024. • A number of school expansion proposals are identified in the School Place Planning Strategy. These could be reflected and referred to in the Local Plan (e.g. under the implementation plan of the policy) • The Richmond Children and Young People's Needs Assessment (July 2015 – not yet published) provides a useful summary of existing education provision in the borough. • LBRUT Infrastructure Delivery Plan (2012) – assesses future need including education and potential funding sources. IDP will need to be updated to reflect changes in education needs and priorities. <p><u>Early years and nurseries</u></p>	<p>This policy will need to be updated to more accurately reflect local needs (e.g. in relation to schools, nurseries etc.) although is unlikely to require any substantial changes and the current policy approach would need to be retained.</p> <p>Consider whether the policy should specifically refer to dual-use or community use aspirations for school sites.</p> <p>With reference to nurseries, it could be clarified that both CP18 and CP16 should be applied when considering applications for new provision or loss of nurseries. Reference will also be made to the latest Richmond Childcare Sufficiency Assessment in terms of the needs and potential under-provision of nurseries and childcare.</p> <p>There is also a need to consider the impacts of the planning approach for Free Schools; the Council is committed to working with providers, including the Education Funding Agency, to resolve, where possible, planning impacts, and the policy could set out what can and cannot be controlled by the Council in relation to Free Schools.</p>

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			<ul style="list-style-type: none"> • Demand for free Early Years places in the borough is very high. Each of the maintained nurseries is oversubscribed. • Richmond Childcare Sufficiency Assessment (2014) - The key areas of under-provision of nurseries and childcare in the borough are in Kew, Mortlake, Barnes and East Sheen where there is only 10% access to full day childcare. <p><u>Young People NEET</u> (Not in Education, Employment, or Training)</p> <ul style="list-style-type: none"> • In 2014, 4.3% of 16-18 years olds were NEET which was slightly lower than the national average of 4.67% though greater than the London average of 3.4%. <p><u>Dual use</u></p> <ul style="list-style-type: none"> • Council's aspiration for dual-use / community use of school sites outside of term times / school hours 	
CP19 Local business	Policy considered to be in accordance with the NPPF, which prioritises economic growth and requires local planning authorities to proactively meet the development needs of businesses. See NPPF core planning principle as well as paras 19, 20 and 21	Policy considered to be in general conformity with the London Plan, which promotes the development of a strong, diverse sustainable economy across all parts of London. See London Plan Policy 4.1, 4.2, 4.3 and 4.4, as well as GLA's London Office Policy Review (2012) GLA Industrial Land Baseline Study 2010 (being updated)	<ul style="list-style-type: none"> • Limited employment land in the borough (see Employment Sites and Premises Study (2013)) • Employment growth in the borough is expected, whereby demand for office space in the Borough is for 62,000sqm over the period 2011 to 2031 – note that this figure does not take account of losses due to prior approvals • Lack of high quality offices as well as shortage of 'low-cost and simple space' • Authority's Monitoring Report • Loss of office space due to Permitted Development Rights (see Employment AMR 2014) is a major concern (between May 2013 and April 2015, 212 prior approvals were approved which, if implemented, would result in a total potential loss of 71,363m² of office floorspace); confirmed by British Council for Offices' research • We have a high number of small business / self-employed / home workers in the borough • There is also demand for space for businesses which are currently in serviced offices who want to expand • Growth in the media sector is anticipated. • All industrial land in the borough should be protected against release to non-employment uses (also consider against release to B1(a) office use) 	Whilst overall the policy is considered to be in general conformity with the NPPF and London Plan, consider the following policy approaches: <ul style="list-style-type: none"> • Strengthen the overall strategy and approach of protecting employment sites, particularly for small / medium spaces and start-ups as well as flexible employment space. • Strengthen specifically the protection of offices by developing a new separate policy to protect office areas (the vulnerable key office areas have been identified for the imposition of Article 4 Directions to restrict the change of use from office to residential without planning permission); this would need a new designation in the Proposals Map. • Support increase in office floorspace in redevelopment schemes (may be area specific). • Consider introducing policy encouragement for affordable office space and planning contributions for the provision of affordable office space.
DM EM 1 Development for Offices, Industrial, Storage and Distribution uses Policy	Policy considered to be in accordance with the NPPF, which places significant weight on the need to support economic growth through the planning system and requires local planning authorities to support existing businesses and plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries.	Policy considered to be in general conformity with the London Plan, which promotes the development of a strong, diverse sustainable economy across all parts of London, and enhances the environment and offer of London's offices. See London Plan Policy 4.1 and 4.2.	<ul style="list-style-type: none"> • There were 74,200 employee jobs in the Borough (ONS 2013) which is 4.3% growth on the previous year • Over 16% of the Borough's working-age residents are self-employed; approximately 60% higher than the self-employment rates for GB as a whole and 4% higher than London • During the last financial year, almost a third of companies in Richmond have experienced growth in their turnover and almost a quarter have increased their headcount • Employment floorspace provision may be the single most important constraint on future business and employment growth in Richmond borough • Employment growth in the borough is expected; demand for office space in the Borough is for 62,000sqm over the 	Whilst overall the policy is considered to be in general conformity with the NPPF and London Plan, consider the following: <ul style="list-style-type: none"> • Explore opportunities to consolidate with Core Strategy policy CP19 • Support increase in office floorspace in redevelopment schemes (may be area specific). • Consider introducing policy encouragement or requirement for affordable office space and planning contributions for the provision of affordable office space (possibly taking account of the needs of the voluntary sector) • Consider including provision of flexible employment space

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	See NPPF paras 19, 20 and 21.		<p>period 2011 to 2031 – note that this figure does not take account of losses due to prior approvals</p> <ul style="list-style-type: none"> Evidence suggests we need additional ‘medium sized’ offices. The 250sqm cited in policy text is still relevant. Also demand for ‘studio’ space and anticipated growth in the media sector. 	
DM EM 2 Retention of Employment	<p>Policy considered to be in accordance with the NPPF, which prioritises economic growth and requires local planning authorities to proactively meet the development needs of businesses. See NPPF core planning principle as well as paras 19, 20 and 21.</p> <p>British Council for Offices research demonstrates significant loss of office stock since May 2013.</p>	<p>Policy considered to be in general conformity with the London Plan, which promotes the development of a strong, diverse sustainable economy across all parts of London, and enhances the environment and offer of London’s offices.</p> <p>See London Plan Policy 4.2 and 4.4.</p>	<ul style="list-style-type: none"> Impacts of Permitted Development Rights (B1 offices to C3 residential): between May 2013 and April 2015, 212 prior approvals were approved which, if implemented, would result in a total potential loss of 71,363m² of office floorspace. Also see the Council’s Employment AMR 2014, which demonstrates loss of employment/offices Authority’s Monitoring Report To address the impacts of the Permitted Development Right, Article 4 Directions have come into effect in various town centres and other areas; and new areas to which the Article 4 Direction applies have been published, where the Direction will come into effect on 1 October 2016 Council’s business survey (2015) shows that 1/5 of businesses have found it difficult to find the right premises; and during the last financial year (2014/15), almost a third of companies in Richmond borough have experienced growth in their turnover and almost a quarter have increased their headcount All research confirms that there is limited employment land in the borough (see Employment Sites and Premises Study, 2013 and a high demand for quality office space as well as a shortage of ‘low-cost and simple space’. Borough-wide Employment Sites and Premises Study (2013) recommends that all industrial land in the borough is protected against release to non-employment uses The loss of floorspace could impact on greater commuting pressures, including out of the borough. 	<p>The evidence suggests that the policy should be updated and the following considered:</p> <ul style="list-style-type: none"> Strengthen existing policy (working in conjunction with a new key office policy), such as: Identify and list the borough’s business parks and industrial estates Clarify definition of employment use Clarify that policy relates to employment floorspace rather than number of employees Review requirements for marketing by setting out specific criteria Review the sequential approach and ensure loss of employment is only allowed in very exceptional circumstances, and set out hierarchy of other uses that would be considered as exceptions Consider potential impacts from new residential development proposed within the surroundings of existing businesses/industrial uses to ensure their viability and operations are not restricted Require mitigation measures to be fully explored where an industrial use may be considered detrimental to neighbours’ living conditions Support increase in office floorspace in redevelopment schemes (may be area specific).
CP20 Visitors and Tourism	<p>No specific national guidance</p> <p>Hotels are considered a town centre use. Therefore the NPPF requires that the needs for hotels are met in full in para 23.</p>	<p>London Plan policies 4.5 and 4.6</p> <p>London’s Arcadia (identified on Map 4.2 of the London Plan and covering the majority of the borough) is identified as a strategic cultural area. London Plan identifies Richmond as potential Outer London Development Centre for leisure, tourism, arts, culture and sports.</p> <p>Richmond & Twickenham are identified as a night time cluster of strategic importance.</p> <p>Working Paper 58, GLA Economics, Understanding the demand for and supply of visitor accommodation in London to 2036 (2013)</p> <p>GLA ‘An A-Z of Planning and Culture’ (October 2015): a large area of Richmond borough is identified as a Strategic Cultural Area.</p>	<ul style="list-style-type: none"> Richmond Borough Hotel Study (2012) Tourist and visitor economy are important to London and to the Borough. 	<p>Evidence suggests that this policy is used on a limited basis when considering planning applications; consider updating the policy:</p> <ul style="list-style-type: none"> references to CP8, CP19 and DM TC 5 include the prevention of loss of bed spaces (as well as encouraging appropriate provision) in line with London Plan targets

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Other issues / requirements / new policy areas	NPPF and other relevant guidance	London Plan	Local evidence and need	Rationale and scope for review
Basements	<p>No national policy or guidance</p> <p>Other national legislation may apply such as:</p> <ul style="list-style-type: none"> • The Party Wall Act • The Highways Act • The Building Regulations • Environmental Pollution and Control legislation 	<p>No specific London Plan guidance, but Mayor's Sustainable Design and Construction SPG (2014) contains some guidance on basements and lightwells and The Control of Dust and Emissions during Construction and Demolition SPG (2014) may also be relevant</p>	<ul style="list-style-type: none"> • Residents' concerns particularly in Barnes but also some other areas such as Kew and Richmond • Council commissioned consultants in 2014 to undertake an independent review of the planning implications of basement developments and the options for the Council • Council's Good Practice Guide on Basement Developments: advice on planning as well as non-planning matters for developers/applicants and for neighbours/residents • New Local Validation Checklist (2015) with specific requirement for a Construction Management Statement for all basement applications and Structural Impact Assessments under or adjacent to listed buildings. • Updated House Extensions and External Alterations SPD, which now includes new sections on basements and lightwells. • New webpage on Basements providing guidance and advice for applicants and residents. 	<ul style="list-style-type: none"> • The Council has already taken reasonable steps to manage the impacts of basement developments; therefore, the Good Practice Guide and the webpage should be kept up to date. • Further guidance in relation to controlling and managing basement impacts could be added within other existing policies, such as flood risk, design or within new policy guidance in relation to environmental impacts, pollution and construction management. • At this point in time, there appears to be insufficient evidence and justification to develop a restrictive basement planning policy in the borough, especially as the problems largely relate to construction impacts in limited parts of the borough; it should be noted that applications for basement could only be refused if there is demonstrable harm. • A Scrutiny Panel will be set up to investigate basement developments in the borough; this will provide further evidence, justification and/or recommendations as to whether a specific basement policy should be developed as part of the Local Plan for this Borough.
Air quality	<p>The NPPF, para 124, states that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.</p> <p>The PPG states that Local Plans may need to consider:</p> <ul style="list-style-type: none"> • the potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments; • the impact of point sources of air pollution (pollution that originates from one place); and, • ways in which new development would be appropriate in locations where air quality is or is likely to be a concern and not give rise to unacceptable risks from pollution. 	<p>The London Plan, Policy 7.14 Improving Air Quality, states that boroughs should have policies that seek reductions in levels of pollutants and take account of the findings of their Air Quality Review and Assessments and Action Plans, in particular where Air Quality Management Areas have been designated.</p> <p>The Mayor's Sustainable Design and Construction SPG (2014) requires 'air quality neutral' developments, and exposure to poor air quality should be minimised and mitigated.</p> <p>The Mayor's Air Quality Strategy (2010) states that new developments should contribute to achievement of air quality objectives, minimise increased exposure to existing poor air quality, ensure air quality benefits are realised through developer contributions and mitigation measures are secured through planning conditions.</p>	<ul style="list-style-type: none"> • Currently very limited policy guidance; existing policy CP1 Sustainable Development states that: "Local environmental impacts of development with respect to factors such as noise, air quality and contamination should be minimised." • Need to assist in addressing exceedances of poor air quality in parts of the borough • Ensure development supports the borough's Air Quality Action Plan • Need to address local concerns and protect sensitive receptors, specifically around schools • Need local guidance in relation to commercial odours and fume control. 	<ul style="list-style-type: none"> • The evidence suggests that there is a need for a local policy and guidance that deals with protecting and enhancing the quality of the local environment, including air quality, environmental pollution, noise and light pollution as well as land contamination whilst promoting and supporting sustainable development. • The evidence suggests there is a need for additional guidance to be set out in a SPD that addresses local environmental impacts and pollution.
Noise pollution	<p>The NPPF states (para 109) that the planning system should contribute to and enhance environment by preventing both new and existing development from contributing to or being put at unacceptable risk from,</p>	<p>The London Plan policy 7.15 on reducing and managing noise states that boroughs should have policies to manage the impact of noise through the spatial distribution of noise making</p>	<ul style="list-style-type: none"> • Currently very limited policy guidance; existing policy CP1 Sustainable Development states that: "Local environmental impacts of development with respect to factors such as 	<ul style="list-style-type: none"> • The evidence suggests that there is a need for a local policy and guidance that deals with protecting and enhancing the quality of the local environment,

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Other issues / requirements / new policy areas	NPPF and other relevant guidance	London Plan	Local evidence and need	Rationale and scope for review
	<p>or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. Policies should aim to (para 123):</p> <ul style="list-style-type: none"> • avoid noise from giving rise to <i>significant adverse impacts</i> on health and quality of life as a result of new development; • mitigate and reduce to minimum adverse impacts on health and quality of life arising from noise from new development, • recognise that development will often create some noise • existing businesses should not have unreasonable restrictions because of changes in nearby land uses • identify and protect areas of tranquillity <p>Other national guidance:</p> <ul style="list-style-type: none"> • PPG – the Local Plan can include specific local noise standards to apply to various forms of proposed development and locations in their area. • Noise Policy Statement for England (NPSE), 2010 • Noise Action Plan: Agglomerations, Defra, 2014 • BS4142 • Environmental Noise Directive (2002/49/EC) 	<p>and noise sensitive uses.</p> <p>Some guidance is also contained within the Mayor's Sustainable Design and Construction SPG (2014)</p>	<p>noise, air quality and contamination should be minimised.”</p> <ul style="list-style-type: none"> • Policy DM DC 5 is also currently used for any applications relating to pollution issues; it states that “In considering proposals for development the Council will seek to protect adjoining properties from unreasonable loss of privacy, pollution, visual intrusion, noise and disturbance.” • There is a need for policy guidance that provides more detail and clarity with regard to noise pollution (this relates to existing and future residents’ living conditions) 	<p>including air quality, environmental pollution, noise and light pollution as well as land contamination whilst promoting and supporting sustainable development.</p> <ul style="list-style-type: none"> • The evidence suggests there is a need for additional guidance to be set out in a SPD that addresses local environmental impacts and pollution.
Light pollution	<p>No specific guidance on light pollution within the NPPF (except para 120 in relation to the effects of pollution on health, the natural environment or general amenity). The PPG contains light pollution guidance, including advice on how to consider the impact of artificial light within the planning agenda to avoid nuisance and ensure amenity.</p>	<p>No specific London Plan policy but some guidance within the Mayor's Sustainable Design and Construction SPG (2014):</p> <ul style="list-style-type: none"> • types of light pollution; • the potential harmful effects; and • how to design lighting appropriately to minimise nuisance. 	<ul style="list-style-type: none"> • Currently very limited policy guidance; existing policy CP1 Sustainable Development states that: “Local environmental impacts of development with respect to factors such as noise, air quality and contamination should be minimised.” • Need to specifically refer to light pollution in policies as currently this is not reflected in any Local Plan policy. • Light pollution is now considered part of the statutory nuisance agenda and as such policy guidance needs to reflect the change in legislation (this relates to existing and future residents’ living conditions) 	<ul style="list-style-type: none"> • The evidence suggests that there is a need for a local policy and guidance that deals with protecting and enhancing the quality of the local environment, including air quality, environmental pollution, noise and light pollution as well as land contamination whilst promoting and supporting sustainable development. • The evidence suggests there is a need for additional guidance to be set out in a SPD that addresses local environmental impacts and pollution.
Land Contamination	<p>The NPPF (para 120) states that the effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.</p> <p>Detailed guidance is also contained within the PPG, which states that site investigation information includes a risk assessment of land potentially affected by contamination, or ground stability and slope stability reports, as appropriate. All investigations of</p>	<p>London Plan Policy 5.21 Contaminated Land states that boroughs should encourage the remediation of contaminated sites and set out policy to deal with contamination.</p> <p>Mayor's Sustainable Design and Construction SPG (2014) states that developers should set out how existing land contamination will be addressed prior to the commencement of their development. Potentially polluting uses are to incorporate suitable mitigation measures.</p>	<ul style="list-style-type: none"> • Currently very limited policy guidance; existing policy CP1 Sustainable Development states that: “Local environmental impacts of development with respect to factors such as noise, air quality and contamination should be minimised.” • There is a need for a policy that provides more detail and clarity in relation to land contamination. 	<ul style="list-style-type: none"> • The evidence suggests that there is a need for a local policy and guidance that deals with protecting and enhancing the quality of the local environment, including air quality, environmental pollution, noise and light pollution as well as land contamination whilst promoting and supporting sustainable development. • The evidence suggests there is a need for additional guidance to be set out in a SPD that addresses local environmental impacts and pollution, including land contamination.

Rationale and scope for review of the Core Strategy and Development Management Plan policies, including assessment against national and regional guidance, local evidence and need

Other issues / requirements / new policy areas	NPPF and other relevant guidance	London Plan	Local evidence and need	Rationale and scope for review
	<p>land potentially affected by contamination should be carried out in accordance with established procedures (such as BS10175 (2001) Code of Practice for the Investigation of Potentially Contaminated Sites). The minimum information that should be provided by an applicant is the report of a desk study and site reconnaissance.</p> <p>Part 2A of the Environmental Protection Act 1990, imposes responsibilities upon local authorities to deal with contaminated land.</p>			
Construction management	<p>No specific national guidance or policy but other national legislation may apply such as:</p> <ul style="list-style-type: none"> • The Highways Act • The Building Regulations • Environmental Pollution and Control legislation • BS5228 Control of Noise from Construction and Demolition Sites • Control of Pollution Act 1974 • Directive 97/68/EC • Non Road Mobile Machinery Regulations 2015 	<p>No specific London Plan policy but the Control of Dust and Emissions during Construction and Demolition SPG (2014) outlines good practice for construction sites and controlling emissions including noise.</p>	<ul style="list-style-type: none"> • Issues of construction management are usually dealt with as part of a planning condition. • The Council adopted a Local Validation Checklist in April 2015, with amendments made in September 2015. This requires that all major applications as well as all applications for basement developments need to be supported by a Construction Management Statement. • There is a need to address the development stage and the impact upon local residents from noise, dust and fumes • Need to consider the impact upon congestion, road safety and vulnerable road users for larger developments • Need to consider the Construction Logistics' Agenda for certain road sensitive developments to deal with congestion and reduce impacts on air quality 	<ul style="list-style-type: none"> • Continue to deal with construction matters as part of planning conditions and/or by requiring Construction Management Statements to be submitted for certain types of applications. • The evidence suggests that there is a need for local policy guidance that deals with protecting and enhancing the quality of the local environment, including air quality, environmental pollution, noise and light pollution as well as land contamination whilst promoting and supporting sustainable development. This can also cover some elements relating to managing impacts of construction. • The additional guidance in the form of SPD that is suggested for dealing with local environmental impacts and pollution matters could also cover construction management issues; this would need to be linked to a new policy referred to under bullet point 2 above.
Minerals planning and aggregates	<p>NPPF, para 142 states that minerals “are essential to support sustainable economic growth and our quality of life”. Para 143 states that Local Plans should:</p> <ul style="list-style-type: none"> • identify and include policies for extraction of mineral resources • set out environmental criteria against which planning applications will be assessed <p>PPG includes extensive guidance on the planning for mineral extraction in plan making and the application process.</p>	<p>London Plan policy 5.20 Aggregates states that mineral planning authorities in London should identify and safeguard aggregate resources in their local plans, and support the development of aggregate recycling facilities, subject to local amenity conditions.</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.</p> <p>LBRuT 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. Policies DM OS 12 and DM TP 3 ensure that wharfs and railways sites respectively are safeguarded.</p>	<p>Based on the London-wide evidence, it is clear that there is no identified need for a minerals planning and aggregates policy or site allocations.</p> <p>Guidance in relation to protecting wharves and safeguarding them for the shipment of freight, including waste and aggregates, could be incorporated within DM OS 12 and transport policies.</p>