



London Borough of Richmond upon Thames
Local Plan Publication (Regulation 19) Version
Schedule of Proposed Modifications Suggested by the Council
03.05.24

Background

The following is a schedule of Proposed Modifications that have been prepared by Richmond Council in response to the representations received as part of the Regulation 19 Consultation of the Local Plan held from 9 June to 24 July 2023. Additionally, several proposed amendments were also identified by Council officers after the submission of the Regulation 19 Version of the Local Plan, rather than in response to issues raised through the public consultation and have been included. [Statements of Common Ground](#) are being finalised and where proposed modifications are agreed between parties these are referred to. This document is intended to serve as a 'live document' and will be updated with any further modifications that are proposed by the Council, for example, as a result of further Statements of Common Ground agreed with representors. These and other documents referred to can be found in the [Examination Library](#).

Please note: Where the Council has suggested a change this is provided only for the benefit of the Planning Inspectors. As the Local Plan has already been submitted for examination, the Council does not have the power to make changes to the Local Plan; it can only be recommended by the Planning Inspectors to do so as Main Modifications should they consider it to be an issue of soundness or legal compliance in accordance with Section 20(7C) of the Planning and Compulsory Purchase Act 2004. Discussion of whether suggested changes are considered as Main Modifications is expected during the Examination. The Council may also make additional (minor) modifications to the plan on adoption, but only if they do not materially affect the plan's policies; some are identified here in the interests of clarity.

How to use this document

- The items below are set out in the order of the Local Plan, as identified under the heading 'Section of the Plan'. The Proposed Pre-Hearing Additional Modifications take the format that proposed additions to the text are recorded in highlighted and underlined text, and proposed deletions are recorded with a highlight and strikethrough.
For example: 'This text is to be retained and this text is to be added ~~but this text is to be deleted~~.'
- The page and paragraph numbers listed below are those in the [Publication \(Regulation 19\) Local Plan published for consultation from 9th June to 24th July 2023 \(SD-001\)](#).

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
				2. Introduction
2.1	n/a	5	Introduction, paragraph 2.5	<p>To reflect updated National Policy Planning Framework (2023):</p> <p>The Local Plan has been prepared within the context of a hierarchical framework of planning legislation and policy for England. At the top of the hierarchy are a number of planning related Acts of Parliament and Statutory Instruments, the National Planning Policy Framework 2021 2023 (NPPF) which sets out Government's planning policies for England and how these should be applied, and the Planning Practice Guidance (PPG).</p>
2.2	n/a	7	Introduction, paragraph 2.16	<p>To update the supporting text in relation to the Government's plan-making reforms, and add a new paragraph to reference the update to the NPPF for clarity:</p> <p>The Government announced in 2020 a wide range of proposals for the reform of the planning system, including fundamental changes as to how Local Plans are prepared. However, the Government's Chief Planner also advised local authorities that they should not let uncertainties stop them from progressing on the development of Local Plans. The plan-making reforms in the Levelling Up and Regeneration Bill Act (LURB) are being brought forward, however there will need to be secondary legislation/regulations and a transition period, therefore the changes will only be relevant to the next Richmond Local Plan, as this Plan is being prepared under the transitional arrangements.</p> <p>Annex 1 of the NPPF (December 2023) set out that under transitional arrangements this Local Plan will be examined under the relevant previous version of the Framework as applicable at the time of pre-submission. This Plan has been examined against the NPPF as at September 2023, however for readability references are also made to the version as at December 2023.</p>
				Vision and Strategic Objectives

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3.1	The Richmond Society (comment 52)	12	Strategic Vision, second paragraph in the 'vision' box	<p>Add additional reference in the strategic vision to improving transport options for those not able to walk or cycle, to reflect Policy 1:</p> <p>Everything a local resident needs can now be reached within 20 minutes by foot or bike. This has been achieved through implementing the 20-minute neighbourhood concept, resulting in a borough with complete, compacted, connected neighbourhoods. Lessons have been learnt from the Covid-19 pandemic, which changed aspects of the way we live, work and connect with each other. Opportunities have been taken to redefine places and retain positive changes, which have increased active travel and use of open spaces, support for local centres and workspaces, and renewed the focus on tackling the climate emergency. All our residents can now 'live locally'; they can easily walk or cycle within 20 minutes to access essential services and fulfil their daily needs, in town and local centres and high streets that provide a range of shops, services, employment opportunities, cultural activities and social connections. Improved access to public transport options aid connections to jobs and places, and have assisted with overcoming barriers for people who experience reduced mobility.</p>
3.2	Environment Agency (comment 51)	17	3.3 Strategic Objectives, 6. Increasing biodiversity and the quality of our green and blue spaces, and greening the borough	<p><i>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024) (SOCG-08)]</i> To reflect requirements under the Water Framework Directive, amend the last bullet point under 'Increasing biodiversity and the quality of our green and blue spaces, and greening the borough':</p> <ul style="list-style-type: none"> • Protect and improve the unique environment of the borough's rivers, especially the River Thames and its tributaries, as wildlife corridors, as flood storage, as opportunities for recreation and river transport; where appropriate increasing access to and alongside the rivers, taking opportunities to use nature flood management techniqueswhere appropriate, and gain wider local community benefits and habitat improvements when sites are redeveloped.
				Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy)

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P1.1	n/a	19	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy), Information box	Remove the information note box following Policy 1, which was included for the Publication consultation only. Information note for the Publication consultation: this policy is not about limiting movement. There are some concerns expressed that this concept, along with traffic measures, would restrict journeys. Any such restrictions are beyond the remit of the Local Plan and are not what the policy seeks to do. It is merely seeking to bring about a pattern of development that makes it an easy choice to 'live locally' and aims to improve, not restrict, accessibility and movement.
P1.2	Transport for London (TfL) (comment 11)	20	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy), Paragraph 4.8	<i>[See also Statement of Common Ground with TfL (signed 28/02/2024) (SOCG-03)]</i> To add reference to the Mayor's Vision Zero Strategy for road safety, as measures may form part of development proposals and associated highways improvements: The 'living locally' concept relies on inclusive and attractive high streets and public spaces, promoting and encouraging walking, cycling and accessibility for all; this complements the Mayor's Healthy Streets approach as set out in TP2 Policy T2 of the London Plan. It should also reflect the Mayor's Vision Zero which seeks to reduce road danger and create a safer transport environment for all.
				Policy 2 Spatial Strategy: Managing change in the borough (Strategic Policy)
P2.1	n/a	23	Policy 2 Spatial Strategy: Managing change in the borough (Strategic Policy), Paragraph 4.19	To correct an error and reflect the Local Housing Needs Assessment (2023 update) (SD-056), update the supporting text: It identifies for affordable rent a need for 1,123 affordable homes per annum across the borough, and a need for 552 284 affordable homes per annum for affordable home ownership ...
P2.2	n/a	23	Policy 2 Spatial Strategy: Managing change in the borough (Strategic	Update the supporting text to reference the Retail & Leisure Needs Study – Update Addendum (April 2024) (PSED-02):

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			Policy), Paragraph 4.19	<i>Retail needs:</i> Richmond upon Thames Retail & Leisure Study (Phase 2) forecasts that up to 2034, there is an over-supply of 2,900 sqm gross of retail floorspace, and an undersupply of food/beverage floorspace of approximately 5,400 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,500 sqm gross. An Addendum (April 2024) confirms up to 2034 an over-supply of approximately 3,000 sqm gross of retail floorspace is forecast, and an under-supply of food/beverage floorspace of approximately 5,500 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,400 sqm gross. Put simply, the need for shopping space is forecast to decrease but the need to provide space for the food & beverage sector and potentially the wider leisure sector is increasing.
				Site Allocations
SA.1	Historic England (comment 80)	Various	Site Allocations, Heritage assets (as relevant)	<i>[See also Statement of Common Ground with Historic England (to be confirmed once signed)]</i> For clarity, refer to all Archaeological Priority Areas (APAs) followed by detail of the relevant zone - <ul style="list-style-type: none"> Site Allocation 9: amend the text: Archaeological Priority Area: Zone – Teddington and in all other Site Allocations where relevant
				Site Allocation 2 Platts Eyot, Hampton
SA2.1	n/a	34	Site Allocation 2 Platts Eyot, 'Proposed Site' at beginning/top of Context box	Clarify the full site address at beginning/top of box: Platts Eyot, Lower Sunbury Road, Hampton, TW12 2HF
SA2.2	Solve Planning, Port Hampton Estates Limited (comment 122)	34	Site Allocation 2 Platts Eyot, 'Existing Land Uses' section in Context box	Amend the text to clarify the existing land uses in the context: Business and employment uses including river-related and river-dependent operations, workshops (Use Class B2/B8), office (Class E(g)), and recording studios (Sui Generis) and dwelling (C2) ; carpark
				Site Allocation 4 Car Park for Sainsburys, Hampton

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SA4.1	Transport for London (TfL) (comment 128)	42	Site Allocation 4 Carpark for Sainsburys, Uxbridge Road, 5 th bullet point	<i>[See also Statement of Common Ground with TfL (signed 28/02/2024) (SOCG-03)]</i> Amend the reference to parking in the vision to ensure consistency with London Plan Policy T6: Parking provision to London Plan standards is expected to be provided including re-provision for the adjacent supermarket in line with London Plan standards .
Site Allocation 10 St Mary's University, Strawberry Hill				
SA10.1	Historic England (comment 188)	66	Site Allocation 10 St Mary's University, Strawberry Hill, 'Heritage Assets' section in Context box	<i>[See also Statement of Common Ground with Historic England (to be confirmed once signed)]</i> Correct factual error (Grade II not Grade I): St Mary's College Chapel, Waldegrave Road (Grade II)
Site Allocation 13 Twickenham Stadium, Twickenham				
SA13.1	n/a	77	Site Allocation 13 Twickenham Stadium, Twickenham, 5 th bullet point	Typo correction: The submission of an odour impact assessment would be requireds upfront.
SA13.2	Transport for London (TfL) (comment 201)	77	Site Allocation 13 Twickenham Stadium, Twickenham, 6 th bullet point	<i>[See also Statement of Common Ground with TfL (signed 28/02/2024) (SOCG-03)]</i> Amend the reference to parking in the vision to ensure consistency with London Plan Policy T6: 'There is a need to retain Parking provision particularly for coaches, servicing facilities and space for spectators and related services, should be in line with London Plan standards and should include coach parking and servicing facilities.'
Site Allocation 14 Mereway Day Centre, Twickenham				

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SA14.1	n/a	80	Site Allocation 14 Mereway Day Centre, Twickenham, 2nd bullet point of 'Relevant Planning History' in 'Context' box	Update the planning history: <ul style="list-style-type: none"> An application has been submitted and is awaiting validation for a residential development and associated car parking <u>was granted planning permission 01/02/2024 (ref. 23/0260/FUL)</u>.
Site Allocation 19 Fulwell Bus Garage, Twickenham				
SA15.1	n/a	97	Site Allocation 19 Fulwell Bus Garage, 3rd bullet point	Remove erroneous bracket: <p>There is a need for housing in the borough and this site is suitable for a substantial provision of new housing units, including a policy compliant level of affordable housing).</p>
Place-based Strategy for Whitton & Heathfield				
PBSW&H.1	Whitton Community Association (comment 222)	100	Place-based Strategy for Whitton & Heathfield	Correction to refer accurately to the existing use: <p>At Whitton Community Centre (Site Allocation 22) there is an opportunity to reprovide community facilities (the existing <u>day community</u> centre and pharmacy) with affordable housing above, to provide modern facilities for the elderly and wider local community.</p>
Site Allocation 21 Kneller Hall, Whitton				
SA21.1	DWD, Dukes Education Group and Radnor House School (comment 568)	105	Site Allocation 21 Kneller Hall, Whitton 2 nd bullet point of 'Access to Open Space/Nature' in 'Context' section	Update to reflect Appendix 4 which includes Kneller Hall as a new SINC: <ul style="list-style-type: none"> <u>Candidate site for designation as a Site of Important Importance for Nature Conservation (subject to Regulation 19 Local Plan consultation)</u>
SA21.2	DWD, Dukes Education Group and	105	Site Allocation 21 Kneller Hall, Whitton,	Update the site description:

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	Radnor House School (comment 568)		3 rd para. in 'Description of Current Site Character' in 'Context' section	The site includes extensive grounds designated as MOL, which include playing fields, with a significant number of protected trees. The grounds are also a designated Site of Important Nature Section, the majority of which is acid grassland, with a proportion towards the south identified as irreplicable.
SA21.3	DWD, Dukes Education Group and Radnor House School (comment 568)	106 - 107	Site Allocation 21 Kneller Hall, Whitton, 10 th bullet point in 'Vision' section	Amends for clarity to cross-reference policy context: <ul style="list-style-type: none"> It is expected that the existing playing fields will be retained and where possible upgraded, such as ancillary facilities including changing facilities, to support the use of the playing fields; provided that any existing ecological benefits and the openness and character of the MOL is retained/protected, and where possible enhanced. There is an expectation that any redevelopment proposal would improve the character and openness of the designated open land and protect the ecological value of the SINC in accordance with Policy 39. Development in the MOL itself would is not be supported, though there may be an opportunity to consolidate and re-provide the current built footprint within the MOL in a new building, in compliance with Local Plan Policy 35 and the requirements of the NPPF, subject to scale, massing and impact on character and openness.
Site Allocation 22 Whitton Community Centre, Whitton				
SA22.1	Joan Gibson (comment 227) and Whitton Community Association (comment 229)	109	Site Allocation 22 Whitton Community Centre, 1 st and 2 nd bullet points of 'Access to Open Space/Nature'	Corrections to the text: <p>Twickenham Cemetery (35m Nature north of site) (150m west) - Other Open Land of Townscape Importance (OOLTI), Site of Important Nature Conservation (SINC)</p> <p>There is a lively and attractive local shopping centre at Kew Gardens Station... there are also local parades at Kew Green and Sandycombe Road which provide for top-up shopping... the strategy for this area is to conserve the character, whilst enhancing existing features where appropriate (junction of Percy Road) (75m northwest) - OOLTI</p>
SA22.2	n/a	110	Site Allocation 22 Whitton Community Centre, Vision	To correct a factual error, delete from the last bullet point in the Vision: the Kneller Hall SPD and accompanying Heritage Assets Assessment and

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				Site Allocation 23 Ham Close, Ham
SA23.1	n/a	116	Site Allocation 23 Ham Close, Ham, 'Relevant Planning History' box in 'Context' section	Update the planning history: 22/1442/FUL - Demolition of existing buildings on-site and change of use of land within Ham Close, the Woodville Day Centre and St Richards Church of England Primary School and the existing recycling and parking area to the east of Ham Village Green for a phased mixed-use redevelopment comprising: a. 452 residential homes (Class C3) up to 6 storeys (with plant above) b. Community/Leisure Facility (Class F2) of up to 3 storeys in height (with plant above) c. Maker labs (sui generis) of up to 2 storeys d. Basement car park e. Provision of on-site cycle, vehicle and servicing parking f. Provision of amenity space and playspace g. Site wide landscaping and alterations to Ham Village Green, and h. New pedestrian, vehicle and cycle accesses and internal routes and associated highways works. - Committee resolution to approve subject to referral to the GLA at Stage 2 and no adverse direction being received, and conditions/informatives. <u>Permission granted 22/03/2023.</u>
				Site Allocation 24 Cassel Hospital, Ham
SA24.1	West London NHS Trust (comment 238)	119, and 120	Site Allocation 24 Cassel Hospital, Ham Common, 'Description of Current Site Character' in 'Context' section, 1 st bullet point of 'Vision' section	Correct the references to the operator of the site. Amend in the description of current site character: Owned by West London Mental Health Trust (WLMHT) <u>West London NHS Trust</u> Amend in the 1 st bullet point of 'Vision' section: Development is dependent on the hospital being declared surplus to requirements and WLMHT's <u>West London NHS Trust's</u> decision...
				Site Allocation 29 Homebase, North Sheen

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SA29.1	n/a	141	Site Allocation 29 Homebase, Manor Road, 3 rd bullet point of 'Vision' section	Delete erroneous bracket: There is a need for housing in the borough and this site is considered suitable for a substantial provision of new housing units including a policy compliant level of affordable housing.
Site Allocation 31 Kew Retail Park, Kew				
SA31.1	Transport for London (TfL) (comment 276)	149	Site Allocation 31 Kew Retail Park, Bessant Drive, Kew. 1st bullet point of 'Transport/Highways' box in 'Context' section	[See also Statement of Common Ground with TfL (signed 28/02/2024) (SOCG-03)] Add: <ul style="list-style-type: none"> PTAL 0-2 'worst to poor'
SA31.2	n/a	151	Site Allocation 31 Kew Retail Park, Bessant Drive, Kew, Last sentence of 2 nd bullet point under Vision	For clarity, amend: ...Any new convenience retail provision should not exceed the floorspace of the existing units, to protect the existing local centre in Kew. There should be no increase in convenience floorspace, to protect the existing local centre in Kew.
SA31.3	n/a	151	Site Allocation 31 Kew Retail Park, Bessant Drive, Kew. 8 th bullet point under Vision	Correct the typo: The applicant will be required to submit a full transport assessment completed in accordance with local and London-wide guidance.
Site Allocation 32 Kew Biothane Plant, Kew				
SA32.1	n/a	154	Site Allocation 32 Kew Biothane Plant, 'Relevant Planning History' in 'Context' box	Update the planning history: An application for 88 residential specialist extra care home of 4-6 storeys was granted planning permission at Committee 16/09/2020 (ref. 18/3310/FUL). Works commenced on site but have not been completed. This permission has not been implemented.
SA32.2	n/a	155	Site Allocation 32 Kew Biothane Plant,	Typo correction:

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			3 rd bullet point under Vision.	The submission of an odour impact assessment would be requireds upfront.
				Site Allocation 35 Stag Brewery, Mortlake
SA35.1	n/a	168	Site Allocation 35 Stag Brewery, Lower Richmond Road, 2 nd para. 'Description of Current Site Character' in 'Context' box	Typo correction: Access is bea via Lower Richmond Road, Williams Lane and Ship Lane.
SA35.2	n/a	168	Site Allocation 35 Stag Brewery, Lower Richmond Road, 3 rd bullet point of 'Relevant Planning History' in 'Context' box	Update the planning history: <ul style="list-style-type: none"> 'There are currently 2 live planning applications under consideration for outline and full permission for a phased redevelopment of the site for demolition, extension and new buildings (3-9 storeys) for a mixed-use scheme comprising residential, flexible-use space (retail, offices), cinema, hotel/pub and secondary school and sixth form.' Planning Committee resolved to grant full and outline planning permission on 18/07/2023 (application refs. 22/0900/OUT & 22/0902/FUL) for a phased redevelopment of the site for demolition, extension and new buildings (3-9 storeys) for a mixed-use scheme comprising residential, flexible-use space (retail, offices café/restaurant, drinking establishment, non-residential institutions and community use and boathouse), hotel/pub, cinema and secondary school and sixth form. Appeal Lodged on 28/02/2024.
SA35.3	n/a	169	Site Allocation 35 Stag Brewery, Lower Richmond Road, 4 th bullet point of 'Vision'	Update the text, as there is no formal 'Area of Mixed Use' designation being taken forward in the Plan: <p>Whilst this site is not located within a town centre, it falls within the Mortlake Area of Mixed Use. It is therefore expected that this site will provide a substantial mix of employment uses, including lower-cost units suitable for small businesses, creative industries and scientific and technical businesses including green technology. Other employment generating uses will also be supported.</p>

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				Policy 3 Tackling the Climate Emergency (Strategic Policy)
P3.1	The Richmond Society (comment 311)	184	Policy 3 Tackling the Climate Emergency (Strategic Policy), Part D	The Council will work with partners and local communities to improve the energy and water efficiency of the existing building stock and wider public realm, with a particular focus on increasing energy efficiency of homes and businesses, especially improved insulation in lofts, walls and floors....
				Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)
P4.1	St George plc and Marks and Spencer (comment 320)	187	Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency, Part D 5.	Correct the reference to the Building Regulations at part D.5: 5. to reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the London Plan's Cooling Hierarchy (Policy SI 4 Managing Heat Risk) and meet the requirements of Part O of the Building Regulations (TM5 92 (domestic) and TM5 29 (nondomestic))
				Policy 6 Sustainable Construction Standards
P6.1	Thames Water (comment 325)	192	Policy 6 Sustainable Construction Standards, Part A 4.	Clarify the approach to the water consumption target and the water efficiency standards: Development that results in a new residential dwelling, including conversions, change of use, and extensions that result in a new dwelling unit, must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met. will be required to incorporate water conservation measures to achieve maximum water consumption of 110 litres per person per day for homes (including an allowance of 5 litres or less per person per day for external water consumption).
				Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy)

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P8.1	Environment Agency (comment 337)	200	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part A	<p><i>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024) (SOCG-08)]</i> Remove the term minimise:</p> <p>All developments will need to be made safe for their lifetime and clearly demonstrate that they avoid, minimise or reduce contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers; taking account of climate change and that they do not increase flood risk elsewhere.</p>
P8.2	Environment Agency (comment 337)	200, and 207	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part B, and Paragraph 16.69	<p><i>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024) (SOCG-08)]</i> Clarify in part B reference to all types of flooding:</p> <p>B. To enable development, proposals must provide mitigation and resilience against flood risk as set out in the Council’s SFRA, <u>including but not limited to adequately raising finished floor levels, providing flood storage compensation and alleviation, and provide appropriate compensation to existing flood risk levels and volumes, addressing the predicted 1 in 100 year Risk of Flooding from Surface Water (RoFSW) mapped depths as a minimum.</u> Advice should be sought from the Lead Local Flood Authority (LLFA) and/or the Environment Agency as appropriate.</p> <p>As a consequence of the above changes to part B, add the following details to supporting text after paragraph 16.69:</p> <p><u>In relation to surface water flooding in line with the current SFRA, proposals must provide mitigation and resilience against flood risk (taking advice from the LLFA as appropriate) and provide appropriate compensation to existing flood risk levels and volumes (addressing the predicted 1 in 100 year RoFSW mapped depths as a minimum), supported by detailed flood risk modelling if appropriate.</u></p>

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P8.3	Environment Agency (comment 337)	200, and 208	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part D, and Paragraph 16.70	<p><i>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024) (SOCG-08)]</i> Clarify in part D the approach to flood storage compensation:</p> <p>Where a Flood Risk Assessment is required, appropriate on-site attenuation measures to alleviate both fluvial, undefended tidal and surface water flooding should be provided over and above the minimum fluvial and undefended tidal flood storage compensation and on-site attenuation requirements, where feasible and justified by evidence.</p> <p>As a consequence of the above changes to part D, agree to add the following to supporting text after paragraph 16.70: A FRA should contain the evidence for the preferred method of mitigation, including any alternatives it was not possible to provide and detail how any associated risks from the chosen form of mitigation can be minimised.</p>
P8.4	n/a	203, and 208	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part H, and Paragraph 16.76	<p><i>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024) (SOCG-08)]</i> Add clarification, as agreed with the LLFA, to reference runoff rates as one of the most important factors in terms of flood risk:</p> <p>H. The Council requires the use of Sustainable Drainage Systems (SuDS) in all development proposals to manage surface water runoff as close to its source as possible, using the most sustainable solutions to reduce runoff volumes and rates. Ideally, all surface water should be managed on site. The development must not increase flood risk elsewhere and where possible reduce flood risk overall. Applicants will have to demonstrate that their proposal complies with the following:</p> <ol style="list-style-type: none"> 1. A reduction in surface water discharge to greenfield run-off rates wherever feasible. 2. where greenfield run-off rates are not feasible, this will need to be demonstrated by the applicant, and in such instances, the minimum requirement is to achieve at least: <ul style="list-style-type: none"> a. a runoff rate of 2 l/s or below, or

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				<p>b. a Where this is not possible and justification is provided, applicants should detail how at least 50% attenuation of the site's surface water runoff at peak times based on the levels existing prior to the development, will be achieved.</p> <p>The following change is also proposed to paragraph 16.76 for clarity:</p> <p>The Council's SFRA identified reducing the rate of discharge from development sites to greenfield runoff rates as one of the most effective ways of reducing and managing flood risk within the borough. Greenfield run-off is the surface water drainage regime from a site prior to development. To maintain the natural equilibrium of a site, the surface water discharge from a developed site should not exceed the natural greenfield run-off rate. Where greenfield run-off rates are not technically feasible, applicants will be expected to clearly demonstrate how all opportunities to minimise final site runoff, as close to greenfield rate as practical, have been taken. In such instances, the minimum requirement is to achieve at least a runoff rate of 2 l/s or below. Where this is not possible and justification is provided, applicants should detail how at least, or a 50% attenuation of the site's surface water runoff at peak times, based on the site's performance prior to development, will be achieved.</p>
P8.5	Environment Agency (comment 337)	203	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Part J	<p><i>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024) (SOCG-08)]</i> Amend as follows to reference the latest TE2100 Plan and future-proof against future updates:</p> <p>In addition, in line with the requirements of the Thames Estuary 2100 Plan, developments adjoining the River Thames must maintain and where necessary enhance or raise (or demonstrate how they could be raised in the future) flood defences to the 2065 statutory level as set out in the TE2100 Plan (or show how they could be raised in the future) (or latest version), demonstrating that they will continue to provide adequate flood protection for the lifetime of the development.</p>
P8.6	Environment Agency	205	Policy 8 Flood Risk and Sustainable	<p><i>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024) (SOCG-08)]</i> Amend as follows to remove 'central' and add 'appropriate' in reference to the climate change scenarios:</p>

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	(comment 338)		Drainage (Strategic Policy), Part L	Submitted FRAs should utilise the <u>central appropriate</u> climate change scenarios when implementing the climate change allowances for surface water and fluvial flood risk. Assessments of tidal flood risk should use the current TE2100 crest levels guidance and breach modelling to account for worst-case scenarios.
P8.7	Environment Agency (comment 338)	208	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Paragraphs 16.72 and 16.74	<p><i>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024) (SOCG-08)]</i> For clarity, amend the drainage hierarchy in paragraph 16.74 to the following:</p> <ol style="list-style-type: none"> 1. <u>Store</u> rainwater for later use as a resource (for example rainwater harvesting, blue roofs for irrigation) 2. <u>Use infiltration techniques, such as porous surfaces in non-clay areas</u> rainwater infiltration to ground at or close to source <p>In addition, as agreed with the LLFA, amend paragraph 16.72:</p> <p><u>In line with Policy SI13 Part E: Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.</u></p>

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P8.8	Environment Agency (comment 337)	209	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Paragraph 16.80	<p><i>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024) (SOCG-08)]</i> Amend as follows to reference the Riverside Strategy Approach set out in the Thames Estuary 2100 Plan:</p> <p>Natural flood management methods, such as those included in the Thames Landscape Strategy’s ‘Rewilding Arcadia’ project, should be employed in development proposals due to their multiple benefits including increasing flood storage and creating leisure areas and habitat. There is the potential to achieve significant improvements when undertaking flood defence work, including improved public spaces, access to the river and the Thames Path, and the creation of new habitats. Development should where possible seek to implement those measures set out in Policy 40 Rivers and Corridors when mitigating flood risk, in line with the Riverside Strategy Approach set out in the Thames Estuary 2100 Plan.</p>
P8.9	Surrey County Council (comment 334), River Thames Scheme (comment 335)	210	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), new paragraph following 16.83 as an additional paragraph under subtitle ‘Flood defences’	<p><i>[See also Statement of Common Ground with Surrey County Council (signed 07/2/2024) (SOCG-01)]</i> Add a new paragraph as follows:</p> <p>The Council supports proposals for strategic flood alleviation measures (and associated enabling works), including the emerging flood alleviation measures at Teddington and Molesey weirs, as part of the wider River Thames Scheme. The project is designed to significantly reduce the risk of flooding by creating a new river channel in two sections alongside the Thames in Runnymede and Spelthorne, as well as increasing capacity at Sunbury, Molesey and Teddington weirs. These proposed works will increase the capacity of the Thames through Surrey and south west London, reducing the risk of flooding.</p>

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P8.10	Environment Agency	207	Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy), Paragraph 16.66	<p><i>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024) (SO CG-08)]</i> For clarification, amend the reference in the supporting text to the functional floodplain to include land riverward of flood defences:</p> <p>The borough contains a number of islands in the River Thames. Where the access and egress to and from the island begins within the functional floodplain, for the purposes of new development, such islands will be considered and treated as functional floodplain (Zone 3b), even if parts of the islands may be within an area of lower probability of flooding. For the River Thames, the functional floodplain is defined as land riverward of the Thames Tidal Flood Defences. In line with the guidance set out in the Council's SFRA, new developments are restricted to 'Water Compatible' and 'Essential Infrastructure' (subject to an Exception Test) as per the guidance in the Flood Risk and Coastal Change PPG.</p>
				Policy 9 Water Resources and Infrastructure (Strategic Policy)
P9.1	Thames Water (comment 343)	211	Policy 9 Water Resources and Infrastructure (Strategic Policy), Part B	<p>Move sub title 'Water quality' beneath Part B:</p> <p>Water quality</p> <p>B. The development or expansion of water supply or wastewater facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long-term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact and that any such impact is minimised as far as possible.</p> <p>Water quality</p> <p>C. The Council expects development proposals to:</p>
P9.2	Environment Agency (comment 344)	212	Policy 9 Water Resources and Infrastructure (Strategic Policy), Paragraph 16.92	<p><i>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024) (SO CG-08)]</i> Add further signposting to state that Richmond is a water stressed area:</p> <p>The Environment Agency and the Council suggest the following modification to 16.92: Population increase, coupled with the designation of the Thames Water region as an area of 'seriously water stressed', means extra demand for water...</p>

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				Policy 10 New Housing (Strategic Policy)
P10.1	Home Builders Federation (comment 354), Avison Young, Avanton Richmond Developments LTD (comment 357)	215	Policy 10 New Housing (Strategic Policy), after Paragraph 17.4	<p>Update the housing trajectory (after paragraph 17.4) with the latest version taken from the AMR – Housing 2022/23 (SD-079):</p> <p>Figure 3: Housing Trajectory as at 1st April 2023</p>
				Policy 11 Affordable Housing (Strategic Policy)
P11.1	n/a	219	Policy 11 Affordable Housing (Strategic Policy), Paragraph 17.16	<p>To correct an error and reflect the Local Housing Needs Assessment (2023 update), update the supporting text:</p> <p>The LHNA estimates a net annual need of 1,123 affordable rented and 552 284 affordable home ownership products to be provided between 2021-2039.</p>
				Policy 12 Housing Needs of Different Groups
P12.1	n/a	226	Policy 12 Housing Needs of Different Groups, Paragraph 17.46	<p>Update the timescale for publication of the London-wide gypsy and traveller accommodation needs assessment:</p> <p>... the Mayor will initiate and lead a London-wide gypsy and traveller accommodation needs assessment, with a report due to be published in 20234,...</p>

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				Policy 13 Housing Mix and Standards
P13.1	Avison Young with input from Montagu Evans and Energist, St George plc and Marks and Spencer (comment 380)	229	Policy 13 Housing Mix and Standards, Paragraph 17.60	Update to reflect the Housing Design Standards London Plan Guidance has now been finalised by the Mayor of London: The Housing Design Standards London Plan Guidance being prepared by the Mayor (consultation draft February 2022 June 2023) provides guidance....
				Policy 17 Supporting our Centres and Promoting Culture (Strategic Policy)
P17.1	n/a	241	Paragraph 18.8	Update the supporting text to reference the Retail & Leisure Needs Study – Update Addendum (April 2024) (PSED-02): 18.8 ... The Richmond upon Thames Retail & Leisure Study (Phase 2) 2023 forecasts that up to 2034, there an over-supply of 2,900 sqm gross of retail floorspace, and an undersupply of food/beverage floorspace of approximately 5,400 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,500 sqm gross. <u>An Addendum (April 2024) updates the quantitative assessment of the Phase 2 Study, to test whether the forecasts were sound using the latest inputs where appropriate, following in particular the publication of updated national expenditure information. This reveals that the revised forecasts are similar to the Phase 2 Study: up to 2034, an over-supply of approximately 3,000 sqm gross of retail floorspace is forecast, and an under-supply of food/beverage floorspace of approximately 5,500 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,400 sqm gross.</u> Put simply, the need for shopping space is forecast to decrease but the need to provide space for the food & beverage sector and potentially the wider leisure sector is increasing.
P17.2	n/a	241	Paragraph 18.9	Update the figure on borough-wide centre vacancy rate, to reflect publication vacancy rates in the borough's centres 2023 (Town Centre Land Use Survey) (January 2024) (SD-088):

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				Together with a borough-wide centre vacancy rate of 7.88.1% in all frontages (Town Centre Land Use Retail Survey 20223), the priority...
P17.3	n/a	242	Policy 17 Supporting our Centres and Promoting Culture (Strategic Policy), Paragraph 18.12	To reflect updated National Policy Planning Framework (December 2023): Primary Shopping Areas (PSAs) have been defined, as required by paragraph 86 90 of the NPPF, for the five town centres only.
Policy 18 Development in Centres				
P18.1	Avison Young with input from Montagu Evans and Energist, St George plc and Marks and Spencer (comment 392)	244	Policy 18 Development in Centres, Part C	Add at C cross-reference at end of first sentence to ensure consistency with Policy 17: Major development and/or developments which generate high levels of trips should be located within a town centre boundary <u>or Site Allocation meeting the requirements of Policy 17 A 2.</u> ...
Policy 19 Managing the Impacts of Development on Surroundings				
P19.1	Theatres Trust (comment 396)	248	Policy 19 Managing the Impacts of Development on Surroundings, Part A	To widen the application of the policy to uses beyond those with late licenses, bringing the policy more closely in line with London Plan policy D13 and paragraph 187 of the NPPF (September 2023)/ paragraph 193 (December 2023), amend part A2: 2. where there are proposals for new residential properties and they are located in close proximity to established or planned uses with late night licences <u>or other existing noise or nuisance-generating business or community activities</u> , the proposed residential use will need to demonstrate that it is capable of mitigating its impact, on established uses and future occupiers.
Policy 23 Offices				

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P23.1	n/a	259	Policy 23 Offices, Paragraph 19.20	To reflect updates to the National Policy Planning Framework in 2023: It is recognised that this could potentially compromise the ability of the Council to protect existing office space in line with this policy, as well as with the requirements of paragraphs 80 81 and 84 82 of the September 2023 NPPF / paragraphs 85 and 86 of the December 2023 NPPF .
				Policy 24 Industrial Land
P24.1	GLA on behalf of Mayor of London (comment 402)	263	Policy 24 Industrial Land, Paragraph 19.33	Add a new paragraph following 19.33 to reference the new London Plan Guidance: The Industrial Land and Uses London Plan Guidance (consultation draft December 2023) provides guidance on assessment of development proposals, including expectations for intensification and co-location considerations.
				Policy 27 Telecommunications and Digital Infrastructure (Strategic Policy)
P27.1	Mortlake with East Sheen Society (comment 419), The Richmond Society (comment 421)	270	Policy 27 Telecommunications and Digital Infrastructure (Strategic Policy), Paragraph 19.62	Add a new paragraph following 19.62 to reference the new London Plan Guidance: The Digital Connectivity Infrastructure London Plan Guidance (consultation draft October 2023) provides guidance on key requirements for development to support digital connectivity infrastructure, achieving better design and mitigating any adverse impacts.
				Policy 28 Local Character and Design Quality (Strategic Policy)
P28.1	n/a	272 - 273	Policy 28 Local Character and Design Quality, Paragraph 20.3, 20.4	Delete sub-heading before 20.3: Village Planning Guidance SPDs and Conservation Area Appraisals Delete paragraph 20.4 from the Plan as this formal programme ended in 2023:

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				20.4 The Council has agreed a two year forward programme for prioritising reviews of the borough's existing Conservation Area Appraisals and developing new Appraisals for those areas that do not yet have an existing one, which commenced in 2021.
P28.2	n/a	273	Policy 28 Local Character and Design Quality, Paragraph 20.5	Delete reference to the Front Gardens SPD (this was superseded and withdrawn following the adoption of the Transport SPD in 2020): The Council has also developed a range of other SPDs, including on Design Quality, House Extensions and External Alterations, Small and Medium Housing Sites, Front Gardens and Shopfronts.
Policy 30 Non-designated Heritage Assets				
P30.1	London Historic Parks and Gardens Trust (comment 434)	280	Policy 30 Non-designated Heritage Assets, Paragraph 20.41	Amendment to reference for clarity. The Council will use the London Historic Parks and Gardens Trust Inventory as a basis for considering locally listing such parks and gardens in the borough.
Policy 32 Royal Botanic Gardens, Kew World Heritage Site				
P32.1	n/a	285	Policy 32 Royal Botanic Gardens, Kew World Heritage Site, Paragraph 20.53	The Royal Botanic Gardens, Kew World Heritage Site Management Plan provides a framework for guiding the activities that take place in the site....
Policy 33 Archaeology				
P33.1	Historic England (comment 80)	286	Policy 33 Archaeology, Paragraph 20.56	<i>[See also Statement of Common Ground with Historic England (to be confirmed once signed)]</i> Amend the supporting text at paragraph 20.56 to specifically reference early involvement of GLAAS: GLAAS is the borough's archaeological adviser and should be consulted with regard to archaeological matters, at an early stage of proposals particularly with regard to place-making and public benefit opportunities.

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				Policy 35 Green Belt, Metropolitan Open Land and Local Green Space
P35.1	n/a	295	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space, Paragraph 21.10	To reflect updates to the National Policy Planning Framework in 2023: In addition, paragraphs 137 – 151 <u>of the September 2023 NPPF 2024 / paragraphs 142 – 156 of the December 2023 NPPF</u> and any future amendments on Green Belts applies equally to MOL.
P35.2	Solomon Green (comment 459), CPRE London (comment 461)	295	Policy 35 Green Belt, Metropolitan Open Land and Local Green Space, footnote to supporting text	Add following footnote at bottom of page (referred to in first sentence of paragraph 21.12 as (5)- this appeared in the Regulation 18 Plan/adopted Local Plan and was then omitted in error): 5 <u>The land at Twickenham and Fulwell golf courses is held under "The Green Belt (London and Home Counties) Act, 1938. An Act to make provision for the preservation from industrial or building development of areas of land in and around the administrative county of London." Under this Act owners are required to request permission from the Secretary of State to build on or dispose of this land. This requirement is separate from and in addition to any requirements for planning permission. Most of this land is protected in the Borough's Local Plan and London Plan by its designation as Metropolitan Open Land under Policy 35 and Policy G3 respectively. However, it is not covered by any planning policy Green Belt designation in the terms described by the NPPF, London Plan and Local Plan.</u>
				Policy 37 Public Open Space, Play, Sport and Recreation
P37.1	Mortlake with East Sheen Society (comment 480)	303	Policy 37 Public Open Space, Play, Sport and Recreation, Paragraph 21.27	To update the supporting text for the updated evidence base on outdoor sport: The Playing Pitch and Outdoor Sports Assessment and Strategy <u>is being reviewed and will be has been</u> updated in 2023. And any other consequential updates elsewhere in the Plan.
				Policy 40 Rivers and River Corridors
P40.1	Environment Agency	315	Policy 40 Rivers and River Corridors, Part A	<i>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024) (SOCG-08)]</i> Add reference to water quality to ensure that development meets the objectives of the Water Framework Directive

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	(comment 495)			<u>The Council expects development adjacent to rivers to contribute to improvement in water quality where relevant in accordance with Policy 9 Part C.</u>
P40.2	Environment Agency (comment 495)	317	Policy 40 Rivers and River Corridors, Paragraph 21.89	<i>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024) (SO CG-08)]</i> Add reference to the preference for naturalised riverbanks when dealing with applications, for biodiversity reasons, at the end of paragraph 21.89: <u>The Council encourages soft-engineering approaches to riverbank protection and the incorporation of an undeveloped buffer zone, where development can contribute to the natural state of the river environment that accords with Policy 39 Biodiversity and Geodiversity.</u>
P40.3	Environment Agency (comment 488)	317	Policy 40 Rivers and River Corridors, Paragraph 21.92	<i>[See also Statement of Common Ground with the Environment Agency (signed 18/04/2024) (SO CG-08)]</i> Add a paragraph after the supporting text at 21.92 to read: <u>The river element of the BNG metric 4.0 (or any superseding version), set out in Policy 39 and the supporting text, will need to be submitted where the BNG guidance advises this is necessary in order to provide increased watercourse connectivity and associated habitat improvements.</u>
				Policy 45 Tall and Mid-Rise Building Zones
P45.1	Historic England (comment 506)	328	Policy 45 Tall and Mid-Rise Building Zones, Part A Point 1)	<i>[See also Statement of Common Ground with Historic England (to be confirmed once signed)]</i> Amend the policy text at part A: 1. Tall buildings should <u>respect avoid harm to</u> the views and vistas towards heritage assets across the borough and in neighbouring boroughs, including distinctive roof line features.
P45.2	GLA on behalf of Mayor of London (comment 514), Historic	331	Policy 45 Tall and Mid-Rise Building Zones, Paragraph 22.24	See proposed change to text in Appendix 3 which should also be amended at paragraph 22.24: Tall building maps in Appendix 3 identify an appropriate tall building height range for each zone and show how heights should be dispersed across the zone. <u>Darker</u>

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	England (comment 506)			Red colours show areas appropriate for tall buildings and orange colours show areas appropriate for mid-rise buildings. Darker indicate more potential for height and the lighter colours indicate less potential for height. ...
P45.3	Avison Young on behalf of Avanton Richmond Developments Ltd (comment 512)	333	Policy 45 Tall and Mid-Rise Building Zones, Paragraph 22.32	<p>Update the supporting text to refer to the latest GLA and Government position on fire safety requirements:</p> <p>The Mayor of London has advised that all referable residential development over 30m in height must include two staircases as a fire safety requirement. Similar measures are expected to come into force nationally via an amendment to Building Regulations following a and Government consultation in 2022 have been introducing new fire safety requirements including a requirement of two staircases for new residential buildings in tall buildings, with this requirement becoming mandatory in all new residential buildings above 18m from 2026 through Building Regulations. Applicants are advised to consult the Government's most recent fire safety and high-rise residential buildings guidance for up-to-date information and requirements. Applicants are further advised that these The measures are in addition to the fire safety requirements set out in London Plan Policy D12, with which all development is expected to comply, and the Mayor's Fire Safety London Plan Guidance (LPG).</p>
				Policy 47 Sustainable Travel Choices (Strategic Policy)
P47.1	n/a	338	Policy 47 Sustainable Travel Choices (Strategic Policy), Part E	<p>To reflect updates to the National Policy Planning Framework in 2023:</p> <p>E. Demonstrate that their proposed developments do not have a severe impact on the operation, safety, or accessibility of the local or strategic road network. Any impact on the local or strategic road network, including the impact of occupants parking vehicles on the carriageway, will need to be mitigated in accordance with para. 110d of the September 2023 NPPF / paragraph 114d of the December 2023 NPPF.</p>
				Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management
P48.1	n/a	344	Policy 48 Vehicular Parking Standards,	To correct paragraph numbering error in Policy 48:

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			Cycle Parking, Servicing and Construction Logistics Management	<i>E has been skipped in error so all from Policy 48 Part F onwards to be changed by one letter</i>
P48.2	n/a	344	Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management, Part C and Part F.3.	Amend the references to: London Cycle Cycling Design Standards
P48.3	n/a	345	Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management, Part K	To reflect updates to the National Policy Planning Framework in 2023: K. Applicants proposing major developments (see Table 23.1 within Policy 47 'Sustainable Travel Choices (Strategic Policy)') will need to demonstrate that all servicing can take place off-street. If this is not possible, they may, depending on the number of servicing trips forecast and the potential impact on highway safety, need to pay for mitigation in the form of Traffic Management Orders and/or S278 highway works that will show their development will not have a severe impact on the safe use of the highway by other road users in accordance with Para. 110b and d of the September 2023 NPPF / Para. 114b and d of the December 2023 NPPF.

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P48.4	CPRE London (comment 539)	347	Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management, Part D of policy and paragraph 23.32	<p>Amend references to Transport SPD (2020) for dealing with crossovers, as the Council as highways authority has recently updated guidance on vehicular crossovers:</p> <p>Applications for new vehicular crossover or dropped kerb accesses will be assessed strictly in accordance with the guidance set out in the London Borough of Richmond's Transport Supplementary Planning Document (adopted July 2020) and the latest highways authority guidance.</p> <p>.. Applicants should refer to the Council's Transport SPD, including for guidance on selection of materials and landscaping to diminish the negative impacts of additional hard surfaces in front gardens if a new crossover is being proposed, along with the updated highways authority guidance.</p>
				Policy 49 Social and Community Infrastructure (Strategic Policy)
P49.1	Sport England (comment 39)	352	Policy 49 Social and Community Infrastructure (Strategic Policy), Paragraph 24.10	<p>To update the supporting text for the updated evidence base on indoor sport:</p> <p>The Council's Indoor Sports Facility Needs Assessment highlights the need for new facilities within the borough and will be updated in 20234.</p>
				Policy 51 Health and Wellbeing (Strategic Policy)
P51.1	n/a	361	Policy 51 Health and Wellbeing (Strategic Policy), Paragraph 25.14	<p>To update the supporting text in relation to health impact assessment for planning applications, to reflect the HUDU rapid HIA tool has become out of date:</p> <p>A Health Impact Assessment (HIA) must be submitted with all major applications. A HIA should assess the health impacts of a proposed developments including consideration of existing health and wellbeing implications. It should identifying mitigation measures for any potential negative impacts as well as measures for enhancing any potential positive impacts. The London Healthy Urban Development Unit (HUDU) have developed a rapid HIA tool to quickly assess the impacts of a development plan or proposal and recommend measures, this tool should be used as early as possible in the planning process and established at pre-application</p>

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				stage. The HIA should be developed from RIBA Stage 1 to help influence concept and technical design as well as consider health and wellbeing inputs from community consultation processes such as workshops. The development of the HIA should demonstrate input from the lead architects and designers. The level of detail required for HIAs will be determined by the scale and impact of the development, HIA guidance is available online via the Council's website. As set out in the Planning Obligations SPD, the London Healthy Urban Development Unit (HUDU) guidance and their Planning Contributions Model should be used to calculate the capital cost of the additional health facilities required to meet the increased demand which arises from new developments.
				Policy 53 Local Environmental Impacts
P53.1	n/a	365	Policy 53 Local Environmental Impacts, Part A	Add full stop to last sentence: These potential impacts can include, but are not limited to, air pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle as well as land contamination.
				Policy 55 Delivery and Monitoring
P55.1	National Gas / National Grid Electricity Transmission (comments 423/424)	378	Policy 55 Delivery and Monitoring, Paragraph 26.18	Include reference to site constraints including existing utilities: 26.18 The IDP therefore ensures that all infrastructure matters necessary for the achievement of the Local Plan Vision and Spatial Strategy as well as the place-based strategies, policies and site-specific proposals are embraced. All new infrastructure should be to high design and sustainability standards, as set out in other policies in the Plan, for example taking into account existing site constraints including utilities situated within sites, and seeking a creative approach to new development around utilities assets.
				Glossary

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G1.1	Trasport for London (comment 79)	388	Glossary	<p><i>[See also Statement of Common Ground with TfL (signed 28/02/2024) (SOCG-03)]</i> Amend the glossary definition for Public Transport Accessibility Levels (PTAL) as follows:</p> <p>Public Transport Accessibility Levels (PTAL) – A measure of the relative accessibility of buildings and uses by to the public transport network. For each point walk time to the public transport network is combined with service wait time (frequency) to give a measure of public transport network density. This provides an overall access index which can be allocated to nine access levels between 0 and 6b. The higher the PTAL score (between zero to six), the better the accessibility. TfL has made pre-calculated PTALs available on WebCAT, its web-based connectivity assessment toolkit (www.tfl.gov.uk/WebCAT).</p>
G1.2	n/a	381, 386, 387	Glossary	<p>To reflect updates to the National Policy Planning Framework in 2023:</p> <p>Centre Hierarchy – The hierarchy of centres in the borough categorises centres and parades into 4 types – town centres, local centres, neighbourhood centres and Important Local Parades. They range significantly in size and function. Paragraph 86 of the September 2023 NPPF/ Paragraph 90 of the December 2023 NPPF requires local planning authorities to define such a hierarchy.</p> <p>...</p> <p>Local Green Space (LGS) – Local communities can identify green or open space which is of special quality and holds particular significance and value to the local community which it serves, in line with paragraphs 101 to 102 of the September 2023 NPPF/ paragraphs 105 to 106 of the National Planning Policy Framework (NPPF)...</p> <p>...</p> <p>National Planning Policy Framework (NPPF) – The NPPF sets out the Government’s planning policies for England and how these are expected to be applied, alongside other national planning policies... The current edition of the NPPF was published in July 2024 December 2023, although in line with transitional arrangements this Plan has been examined against the September 2023 version.</p>

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				and further updates have recently may been subject to consultation by the Department for Levelling Up, Housing, and Communities.
				Appendices
APP2.1	n/a	411	Appendix 2: Marketing requirements, Paragraph 28.12	To correct error – section relates to industrial land and business parks. 28.12 Please note that provision of marketing will not be accepted as justification for an exception to policy; there should be no net loss of office industrial floorspace.
APP3.1	GLA on behalf of Mayor of London (comment 514), Historic England (comment 506)	413	Appendix 3: Tall and Mid-Rise Building Zones, First paragraph	<i>[See also Statement of Common Ground with the GLA on behalf of Mayor of London, and Statement of Common Ground with Historic England (to be confirmed once signed)]</i> Amend the text: Darker Red colours on the Tall and Mid-Rise Building Zone maps show areas appropriate for tall buildings and orange colours show areas appropriate for mid-rise buildings. Darker colours indicate more potential for height and the light colours indicate less potential for height.
APP4.1	n/a	417-431	Appendix 4: Review of Sites of Importance for Nature Conservation	The Council is producing an updated Appendix 4 to reflect the updated evidence published in 2023 in the Review of Sites of Importance for Nature Conservation (SD-064) including to: <ul style="list-style-type: none"> confirm the candidate site Collis Primary School (Site 1) – change from a candidate site to a new site of local grade importance confirm the candidate site York House Gardens (Site 9) – change from a candidate site to a new site of local grade importance confirm the candidate site Oldfield Road Meadows (Site 7) – change from a candidate site to a new site of local grade importance. In addition other updates have been identified as necessary to Table 28.2 and the mapping details including: <ul style="list-style-type: none"> Reinstate the missing row in the table to reference Twickenham Junction Rough. Delete reference to the survey pending at Royal Mid-Surrey Golf Course.

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				<ul style="list-style-type: none"> Correct an error to show the boundary of Orford House (former St Michaels Convent) to reflect the boundary in the adopted Local Plan (no amendments are proposed to this adopted designation). <p>In light of the above a comprehensive check on the mapping is being undertaken, including for discrepancies against the Greenspace Information for Greater London (GiGL) records. An updated Appendix 4 including the above amends and any other suggested updates will be including within the Council's relevant hearing statement for consideration during the Examination.</p>