

Richmond Local Plan 'The best for our borough' Draft for consultation

Planning

9 June 2023

Publication (Regulation 19) Consultation Version

Including changes to the Policies Map designations

For Public Consultation until 24 July 2023

and promoting local employment opportunities and training programmes.

- Encourage opportunities for leisure, entertainment, sport, and cultural activities, which enable active and inclusive lifestyles.



10. **Creating safe, healthy and inclusive communities**

- Create environments that enable active, resilient and inclusive communities and enable residents to lead safe and healthy lives; including recognising the importance of opportunities for

place-based connections that put people first.

- Recognise the importance of health as a cross cutting priority, from the role of streets and public spaces to providing for health and care, wellness and fitness uses; ensuring inclusive access across all types of development and places, based on an inclusive neighbourhood approach, and supporting the Healthy Streets approach.
- Ensure local environmental impacts of development are not detrimental to the health, safety and the amenity of existing and new users or occupiers of a development or those in the surrounding area.

4 Spatial Strategy, Place-based Strategies and Site Allocations

Policy 1

Living Locally and the 20-minute neighbourhood (Strategic Policy)

- A. To help people and places to thrive we need to transform the way we live. We need to create environments that make it easier to be physically active, enhance opportunities for walking and cycling safely, create high quality public spaces and public realm, improve connectivity and accessibility for all, and focus on supporting the high streets, centres and parades as destinations that people want to go to and use to 'live locally'. Creating a borough where everything a resident needs can be reached within 20 minutes by foot or bike will not only improve the quality of life but will bring multiple benefits of healthier lifestyles, cleaner air, stronger local economies and above all better resilience against climate change.
- B. The 'living locally' concept will be achieved by:
1. giving people the ability to meet most of their daily needs, through a mixed pattern of land uses including food and necessities, within a 20-minute walk from home, with safe cycling and local public transport options;
 2. facilitating access to quality public transport that connects people to jobs and other places they need to go to, especially improving inclusive access and overcoming barriers for people who experience reduced mobility;
 3. promoting and enabling healthier lifestyles and active living by improving walking and cycling infrastructure to achieve the borough's target of 75% of trips being undertaken by walking, cycling and public transport;
 4. offering a high-quality public realm and open spaces;
 5. delivering new developments at densities that make local services and transport viable;
 6. improving accessibility and connectivity of green infrastructure;

7. facilitating thriving local economies;
8. following the Mayor's Healthy Streets Approach to ensure walking and cycling are the natural choices for local journeys, and using the Healthy Streets Toolkit to assess new infrastructure schemes.

C. All development (except householder applications for alterations) should:

1. demonstrate how they will deliver improvements that support the 'living locally' concept;
2. be permeable by foot and cycle, with good connections and signage to local walking and cycling routes/networks as well as public transport;
3. demonstrate that future occupiers of the development are able to meet their shopping, work, recreational and cultural needs within a 20-minute walk or cycle and how the new development will contribute to sustaining the 'living locally' concept;
4. demonstrate that the proposals will not lead to any deterioration in the provision of, and access to, services to meet shopping, work, recreational and cultural needs for local communities;
5. demonstrate how a proposal will reduce the dominance of vehicles.

Major developments of 10 or more residential units or non-residential development of 500sqm of floorspace or more:

6. must demonstrate how the proposal will improve local walking and cycling routes, including accessibility to the existing network, in areas with lower levels of public transport accessibility or higher levels of health deprivation and disability.

D. The Council will make use of planning obligations to create or reinforce successful 20 minute neighbourhoods. This could be relating to play and recreational facilities, low traffic neighbourhoods, walking and cycling infrastructure and active travel networks, public space and public realm improvements, green infrastructure provision, daily service provision, in line with other policies in this Plan. Conditions may be applied to planning permissions to retain a specific land use to ensure the continued and reinforced provision of services that enable living locally.

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.

4.1 The 20-minute neighbourhood concept is the idea that our places should be complete, compact and connected neighbourhoods where most things you need for shopping or visiting are an easy walk or cycle away. For many, the pandemic has highlighted the benefits of living locally and having facilities locally; it responds to the challenges of climate change, health, affordability and liveability. The 20-minute neighbourhood concept enables the borough's communities to 'live locally', a concept which is at the heart

of this Local Plan. This concept takes a holistic approach and focuses on ease of travel, walkability and access to public services, and in light of the pandemic, it takes into account changing high streets, workplaces, cultural activities and social connections.

4.2 Changes in the way we shop were already affecting our high streets before the pandemic, particularly internet shopping; the pandemic and associated lockdowns have

accelerated this trend. Recent changes to the planning system, particularly the introduction of the new combined business land Use Class E and changes to permitted development rights mean that there is even more potential for change in our high streets than ever before. As more of us stayed at home, many have realised the value of our neighbourhoods – places to get our essential goods and services, to relax and meet, to enjoy our leisure time and to appreciate our high quality open spaces.

4.3 Recognising the Council's role of working in partnership with stakeholders to consider the future of our high streets and town centres amid the changing times, a Richmond Partnership Conference was held in 2021 to discuss unlocking the potential of our centres. The headline outcomes discussed included the need for town centres and high streets to be destinations beyond shopping to attract and retain visitors, as people centred places that are appealing to pedestrians. The conference was followed by a series of virtual Community Conversations within each area of the borough. The results of those events have informed the preparation of this Local Plan.

4.4 The Mayor of London has set out a missions-based approach to meet the most challenging period in recent history in terms of restoring confidence in the city, minimising the impact on London's most vulnerable communities and rebuilding the city's economy and society following the coronavirus pandemic. One of the nine missions is 'High Streets for All', which sets out a clear intent to work with London's diverse communities to establish new, exciting and experimental uses across London's high streets and public spaces.

4.5 The mission seeks to stitch the essential uses of the city back together, following decades of dispersal and separation and invites us to rethink the way we live and move around the city. It also recognises that thanks to London's pre-industrial roots 90% of all Londoners live within with 10 minutes of their local high street. 'High Streets for All' focuses on the vital role that high streets and local neighbourhoods play in the economic and

social life of the city, complements the Council's 'living locally' concept, a key feature of the borough's Spatial Strategy.

4.6 Unlike parts of central London, which rely heavily on commuters and visitors, Richmond borough needs to plan for and grasp the opportunities provided by more people living and working locally. There is potential to create a more participatory, inclusive and community-focused economy, with shared workspaces that enable collaboration, knowledge exchange and increased business productivity. To ensure we establish and maintain a 20-minute neighbourhood for all parts of the borough we need to build on the momentum of remote working by providing flexible and family friendly local work spaces, and this may also mean reimagining traditional workspaces as centres for collaboration, innovation and enterprise.

4.7 It is essential that the mix of land uses in the borough are preserved, where the historic patterns of development that have resulted in a mix of uses, such as a small employment site tucked away at the end of a road or a community use right in the heart on a quiet residential corner. These need to be preserved, both within individual areas and on individual sites, to make efficient use of our limited land, enable successful places and reduce the need for journeys.

4.8 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 of the London Plan.

4.9 It is recognised that not all residents will be able to comfortably walk or cycle part of or the whole distance to meet their daily needs. People who experience reduced mobility such as older people, people with disabilities, and people with young children require more considered interventions such as an increased number of benches to provide respite, increased use of electric bikes and scooters, easier access to public transport, and supporting more covered bus shelters with seating. Priority should be given to the retention and, where appropriate, enhanced provision of disabled parking spaces for those

whom it is a necessity. Policy 47 'Sustainable Travel Choices (Strategic Policy)' ensures inclusive mobility in new development.

4.10 One of the underlying fundamental aims of the 'living locally' concept in Richmond borough is to reduce urban carbon emissions and biodiversity loss. Environmental improvements in the public realm, changing the way we access our high streets to sustainable modes of transport and using local services and shops will help us tackle the climate and ecological emergencies whilst improving air quality, creating green jobs and enabling us to transition to a low carbon society.

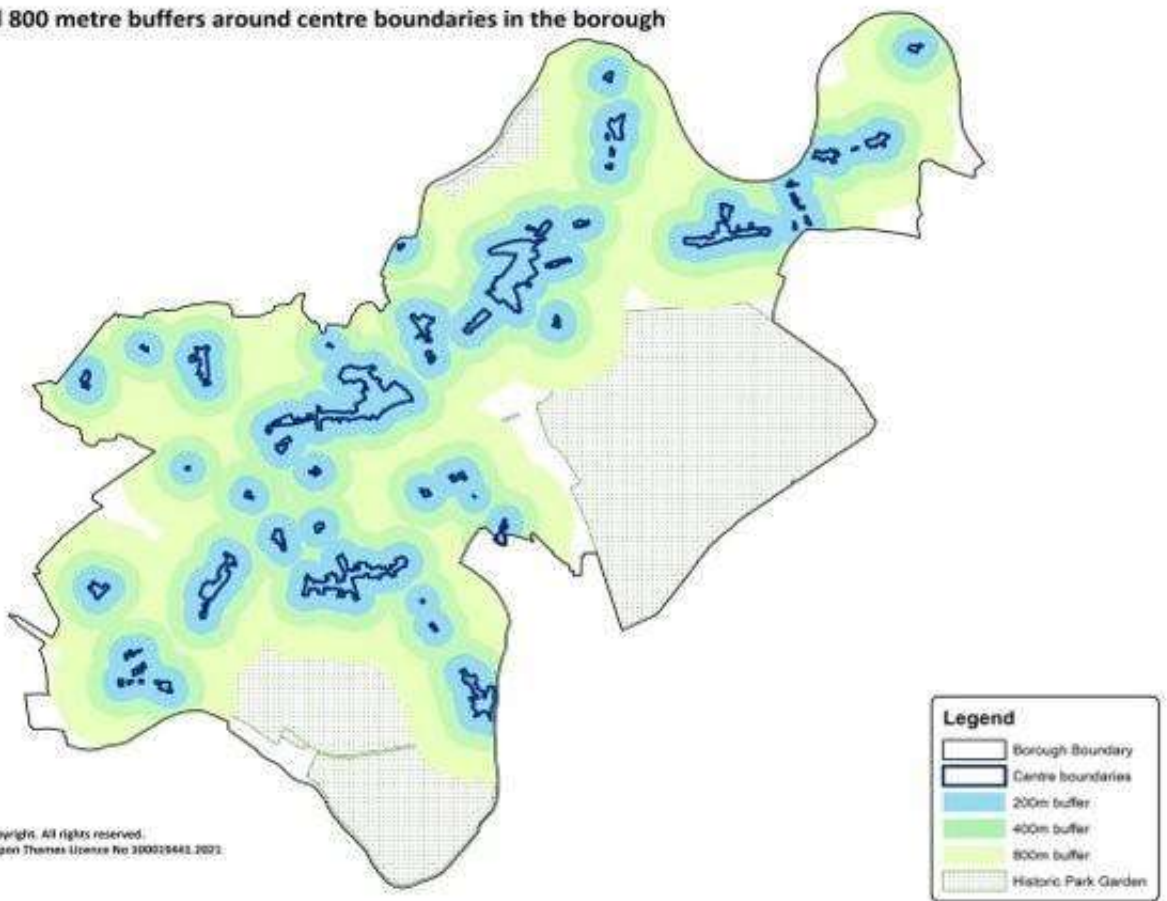
4.11 To facilitate the 20-minute neighbourhood concept, the Council will ensure, through planning and other interventions, that local assets, businesses and partnerships are provided that local people want to use and value. This could for example include meanwhile uses and/or temporary leases for premises awaiting longer-term

redevelopment, which could provide a range of creative and flexible community uses. Other innovative approaches will be supported by the Council, such as cycle-based local distribution hubs. High streets and neighbourhood centres will therefore not just provide services to meet daily essential needs, but they will also play a greater community, cultural and creative role.

4.12 The map below depicts the borough's centres, with different shaded buffers applied for 200, 400 and 800 metres. These buffers are applied 'as the crow flies' rather than actual walking distances. As a guide, 400 metres is an around 5-10 minute walk. Applying an 800-metre buffer, it is evident that most of the borough benefits from a centre or parade; therefore it is important to ensure that these centres are sustained and enhanced to continue meeting the 'living locally' concept for the majority of the borough.

Map 4.1 200, 400, and 800 metre buffers around centre boundaries in the borough.

200, 400 and 800 metre buffers around centre boundaries in the borough



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- 4.13** The majority of the borough's residents already live within an 800-metre catchment of a town, local, or neighbourhood centre, or local parade. Development proposals should contribute to increasing accessibility of these centres by foot, bike, and public transport, thus reducing dependency on car use. Although it can be envisaged from any point in the borough, to implement the policy at a practical level emphasis is given to a liveable neighbourhood, and where these overlap people will relate to more than one place. There is no intention to set out zones with fixed boundaries.
- 4.14** The Council's Local Implementation Plan for Transport sets out active travel targets. It shows that residents in Whitton, Hampton and East Sheen are less likely to achieve the active travel target than those living in Twickenham, St Margarets and Richmond. There is a correlation between areas with low active travel levels and areas with both lower levels of public transport accessibility and higher levels of health deprivation and disability. There are pockets of relative deprivation around Castelnau, Ham, Hampton Nursery Lands, Heathfield, Mortlake and Whitton. The London Plan directs incremental intensification to existing residential areas within high Public Transport Accessibility Levels (PTALs) or close to stations or town centres, which will be shown on the Policies Map as identified in Map17.1 and Policy 16 'Small Sites'.
- 4.15** The Council will also use initiatives outside of planning to target these areas for both infrastructure improvements and community schemes, designed in partnership with Transport and Public Health. Interventions will include improving local walking and cycling routes to schools, town centres, bus stops and local rail stations, as well as softer measures such as school travel planning and promotion of cycling training to local residents.
- 4.16** Applicants are expected to demonstrate in planning documents such as Planning Statements, Design and Access Statements, Transport Statements, and other such supporting documents with an application, how the proposed development would contribute to "Living Locally". It should form part of the early stages of a site assessment, complementary to how a design-and character-led approach to development starts with a site analysis, putting "Living Locally" at the heart of understanding the existing context and how the proposal will contribute to the criterion in part C of the policy. While proportionate to the scale and type of development, if the location and nature of the proposal mean that improvements to deliver the 'living locally' concept are necessary, these should be clearly set out in an application. The Council will keep under review the need for further guidance to support the policy implementation, which could be integrated within updates of existing Supplementary Planning Documents (SPDs).

Policy 2

Spatial Strategy: Managing change in the borough (Strategic Policy)

The overarching aim is to ensure that growth is delivered in a sustainable way, with supporting infrastructure, while tackling the climate emergency and biodiversity crisis.

- A. The Local Plan seeks to deliver the Council's vision and meet the identified needs by directing new higher density development including homes, jobs, community uses and infrastructure to sites in the town centres or places that are that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. New smaller scale development will be appropriate in the local centres to support Living Locally. Beyond these areas, incremental intensification will contribute to achieving growth, having regard to the existing townscape character.
- B. Development in the borough will prioritise the use of previously developed land, including the reuse and conversion of existing buildings to minimise embodied carbon with a presumption in favour of refurbishment.

- C. Development in the borough will promote the provision of green infrastructure that creates resilience and helps mitigate the impacts of climate change, and protect and, where possible, enhance the environment, local character and heritage assets.
- D. Proposals should have regard to the relevant place-based strategy and set out how a character- and design-led approach to change has been taken.

4.17 The Spatial Strategy, as set out above, continues the approach taken in the adopted Local Plan. It builds on information from our evidence base, including feedback from public consultation as well as the Sustainability Appraisal, which sets out a detailed and up-to-date analysis of the key sustainability issues, challenges, and opportunities for the borough. The Spatial Strategy also sets out how the main elements of the strategic vision and strategic objectives for the borough are to be delivered over the plan period.

4.18 The Local Plan aims to meet the needs of local communities and businesses through the provision of housing, employment, schools, community services, social infrastructure, leisure and other local services, in a sustainable way – following the ‘Living Locally’ concept as set out above in Policy 1 ‘Living Locally and the 20-minute neighbourhood (Strategic Policy)’. The policies in the Local Plan follow the approach of the NPPF’s presumption in favour of sustainable development. Paragraph 9 in the NPPF recognises planning policies should play an active role in guiding towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of the borough. The Council places emphasis on protecting and, where possible, enhancing the special environment, local character and uniqueness of this borough by recognising the environmental constraints and limits that provide the context for growth in the borough and which need to be respected. This includes the locally distinctive historic and cultural environment, protected parks and open spaces, the River Thames and its floodplain.

4.19 To understand future needs for housing, employment, retail and leisure, a Local Housing Needs Assessment, Employment

Land & Premises Needs Assessment, and Richmond upon Thames Retail & Leisure Study Phase 1 and Phase 2 have been undertaken.

Housing: the London Plan sets the 10 year target of 4,110 net housing completions for the borough (2019/20 to 2028/29), based on a comprehensive study of capacity for housing delivery. The Local Housing Needs Assessment is an unconstrained assessment of the number of homes needed in the borough, following the Government's methodology. It identifies for affordable rent a need for 1,123 affordable homes per annum across the borough, and a need for 552 affordable homes per annum for affordable home ownership; the unconstrained figures represent an acute affordable housing need.

Retail needs: 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. 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. There is currently no requirement to allocate sites for major retail development. In the short to medium term there is emphasis on repurposing existing floorspace, with the study finding the existing stock of premises can play a role in accommodating project growth, through vacant properties and growth in sales densities.

Employment needs: The borough’s Employment Land & Premises Needs Assessment advises the Local Plan should seek to accommodate growth of 60,000 sqm industrial floorspace but recognises there are few options to address this deficit. For office floorspace there is a shortfall

Development Type	Proposed Local Plan Standards
	Meet fabric efficiency targets as set out in Table 16.2 of the Local Plan
Non-residential development of 100sqm Gross Internal Area (GIA) or more (including new build, change of use and refurbishments).	<p>Submit Sustainable Construction Checklist</p> <p>Net-zero with minimum 60% on-site reduction; with a maximum of 40% to be offset at a rate of £300/t</p> <p>Meet London Plan Energy Hierarchy</p> <p>Provide Energy Strategy in line with GLA Energy Assessment Guidance 2022</p> <p>No gas boilers after 2024</p> <p>Meet Part O, overheating mitigation requirements, and F, ventilation requirements, of Building Regulations.</p> <p>Target of on-site renewable of 40% of building footprint</p> <p>Disclose the anticipated Energy Use Intensity</p> <p>Meet fabric efficiency targets as set out in Table 16.2 of the Local Plan</p> <p><i>Proposals above 500sqm (GIA) must also:</i></p> <p>Connect to existing Decentralised Energy Network (DEN) or one in the vicinity of the site.</p> <p>Provide assessment of on-site DEN including microgeneration such as solar technologies</p> <p>BREEAM Non-domestic New Construction 'Outstanding', where applicable</p> <p>BREEAM Non-domestic Refurbishment and Fit-out 'Outstanding', where applicable</p>

Policy 7

Waste and the Circular Economy (Strategic Policy)

Waste

A. The Council will ensure waste is managed in accordance with the principles of the Circular economy.

1. All developments, including conversions and changes of use are required to provide adequate refuse and recycling storage space and facilities for the separate collection of dry recyclables (card, paper, mixed plastics, metals, glass) and food, which allows for ease of collection and which residents and occupiers can easily access, in line with the guidance and advice set out in the Council's SPD on Refuse and Recycling Storage Requirements.

2. All developments need to ensure that the management of waste, including the location and design of refuse and recycling facilities, is sensitively integrated within the overall design of the scheme, in accordance with policies on Local Character and Design.
3. Where appropriate development proposals should make use of the rail and the waterway network for the transportation of construction, demolition and other waste. Development proposals in close proximity to the river should utilise the river for the transport of construction materials and waste where practicable. Transporting goods by water can mean lower carbon emissions whilst also removing vehicles from the roads, subject to vessels using ideally zero carbon or low carbon technologies.
4. All major developments and engineering works, and where appropriate developments that are likely to generate large amounts of waste, are required to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials. A Construction Environment Management Plan (CEMP) is required for all development using the river to transport construction materials and waste.

B. The borough's waste sites are safeguarded. Proposals affecting existing waste management sites, as well as proposals for new or additional waste management facilities, will be assessed against the policies of the West London Waste Plan and the London Plan.

Circular economy

C. A circular economy is an alternative to a traditional linear economy (make, use, dispose) in which we keep resources in use for as long as possible, extract the maximum value from them while in use, then recover and regenerate products and materials at the end of each service life.

1. All development proposals are required to adopt a circular economy approach to building design and construction to reduce waste, to keep materials and products in use for as long as possible, and to minimise embodied carbon. All development should:

a. Prioritise the reuse and retrofit of existing buildings wherever possible before considering the design of new buildings.

b. Be designed for durability and flexibility as well as easy disassembly and reuse to minimise waste during the 'in-use' and 'end of life' phases of the development. Building shape and form should be designed to minimise embodied carbon and limit the need for repair and replacement.

c. Ensure resource efficiency and reduce embodied carbon emissions by sourcing and prioritising materials that can easily be maintained, repaired and renewed across the development lifetime.

d. Minimise the environmental impact of materials by specifying sustainably-sourced, low impact and re-used or recycled materials; this should include identifying opportunities for the retention and reuse of existing materials on site (e.g. re-using demolition material on site). Materials should be locally-sourced wherever possible to minimise transport emissions.

2. All development resulting in the creation of 10 or more dwellings or 500sqm or more non-residential GIA must submit a Circular Economy Statement utilising the guidance and principles set out by the GLA (Conserve resources, increase efficiency and source sustainably, Design to eliminate waste (and for ease of maintenance) and Manage waste sustainably and at the highest value) and undertake a Whole Life-Cycle Carbon assessment proportionate to the scale of development and demonstrate that whole life-cycle carbon savings have been maximised.

Waste

16.44 Boroughs are required to allocate sites and identify waste management facilities in order to provide sufficient capacity to manage the apportioned tonnages of waste, as set out in the London Plan. To achieve this, the Council adopted the West London Waste Plan (WLWP) in 2015 in partnership with the West London Waste Authority boroughs of Brent, Ealing, Harrow, Hillingdon and Hounslow (this also includes the Old Oak and Park Royal Development Corporation). The Plan sets out how the boroughs will jointly manage their waste apportionment requirements as set out in the London Plan. The WLWP is due for review by 2031.

16.45 This policy seeks to minimise the amount of waste going to landfill and contributes towards the borough being more self-sufficient in dealing with its waste. For example, logistics hubs that support last mile deliveries by electric vans or cargo bikes as set out in Policy 22 could be used to distribute surplus food waste. In addition, the Council considers the layout, siting, function and design of recycling and refuse storage facilities to be an integral part of the development process. As set out in more detail in our Refuse and Recycling: Storage and Access Requirements SPD, proposals for new developments should integrate refuse and recycling within the scheme without causing undue noise and odour nuisance or other impacts on amenity and living conditions. Construction Environment Management Plans are required where development is proposed that uses the river to transport construction materials and waste, in addition to site waste management plans.

16.46 Waste sites should only be released to other land uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput of the intended site over the last five years.

16.47 The Council will apply the policies of the WLWP over the lifetime of the Local Plan when dealing with applications affecting existing waste sites, such as the Central Depot in Twickenham, the Civic Amenity site in Townmead Road or any other sites with

waste management or treatment facilities as identified in the WLWP. In addition, the policies of the WLWP and the London Plan will be used for assessing proposals for new or additional waste management facilities in the borough.

Circular economy

16.48 The aim of a circular economy is to address the problems of resource use by rejecting the take-make-dispose model of production and consumption that has persisted in the past. Instead, waste is “designed out” and materials are kept at a high value for longer through reuse, repair and recycling.

16.49 A more circular economy will:

1. reduce waste,
2. drive greater resource productivity,
3. deliver a more competitive economy,
4. position the UK to better address emerging resource security/scarcity issues in the future, and
5. help reduce the environmental impacts of production and consumption.

16.50 The construction of a development uses energy and resources, which represent its embodied carbon emissions. As buildings become more energy efficient and energy generation is decarbonised, the proportion of operational emissions will significantly reduce and embodied carbon will represent a higher proportion of whole life-cycle carbon emissions. Addressing these carbon emissions are key to achieving UK, London and Richmond Borough targets on net zero. All new build development will be expected to endeavour to minimise embodied carbon in line with best practice targets contained within the Mayor’s [Whole Life-Cycle Carbon Assessments London Plan Guidance](#)(2022) and other latest industry guidance.

16.51 Circular economy opportunities in developments might include using materials with a lower embodied carbon (e.g. timber rather than concrete frame), using more recycled content in the materials and finding other ways to enhance recovery and recyclability (e.g. reinforcement free concrete). Mechanical and electrical services should therefore be designed to allow easy

repair, recovery, reconditioning and reuse whilst also optimising for performance and carbon emissions. Encouraging a 'fabric first' approach to building design can also minimise mechanical plant and services in favour of natural ventilation.

16.52 Circular Economy Statements are intended to cover the whole life-cycle of a development and to demonstrate how a development will incorporate Circular Economy measures into all aspects of the design, construction and operation process. A Circular Economy Statement should demonstrate:

1. how all materials arising from demolition and remediation works will be re-used and/or recycled
2. how the proposal's design and construction will reduce material

demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life

3. opportunities for managing as much waste as possible on site
4. adequate and easily accessible storage space and collection systems to support recycling and re-use
5. how much waste the development is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
6. how performance will be monitored and reported.

16.53 The Mayor has published guidance on the production of [Circular Economy Statements](#).

Policy 8

Flood Risk and Sustainable Drainage (Strategic Policy)

- A. 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. Development will be guided to areas of lower risk by applying the 'Sequential Test' as set out in national policy guidance, and where necessary, the 'Exception Test' will be applied. A sequential approach should be taken to the layout of sites, locating development in areas at lowest risk from flooding on a site. Unacceptable developments and land uses will be refused in line with national policy, the requirements set out in the Council's Strategic Flood Risk Assessment (SFRA) and as outlined in the table below.
- B. To enable development, proposals must provide mitigation and resilience against flood risk as set out in the Council's SFRA, 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. Advice should be sought from the Lead Local Flood Authority (LLFA) and/or the Environment Agency as appropriate.
- C. For all proposals on sites of 10 dwellings or more, or 1000sqm of non-residential development or more, in Flood Zones 2 and 3, or in areas at Risk of Flooding from Surface Water in a 1 in 100 year event or greater, or within a Surface Water Management Plan hotspot, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted.
- D. Where a Flood Risk Assessment is required, appropriate on-site attenuation measures to alleviate both fluvial and surface water flooding should be provided over and above the minimum fluvial and undefended tidal flood storage compensation requirements where feasible.
- E. Where possible, land within major development sites should be safeguarded for potential flood mitigation use through the active consideration of predicted flood mapping from all sources.

Public houses and bars and drinking establishments

18.53 Changes to the Use Classes Order mean public houses are now a Sui Generis use. Public houses (including bars and other drinking establishments for the purposes of this policy) play an important role and social function in the local community, and they add to the local character of an area, and can often be buildings of historical or architectural interest. Many pubs provide a hub for social interaction, cultural identity, heritage and character of an area. Therefore, the Council will resist the loss of public houses. In the supporting text to London Plan Policy HC7, there is guidance on the broad range of characteristics that will be taken into account in assessing whether a pub has heritage, cultural, economic or social value. The listing of a pub as an Asset of Community Value will also be a material planning consideration.

18.54 When assessing a proposal for the change of use from a public house, the Council will take into account the following:

- Whether there is another within 400 metres;
- whether the use is inappropriate in terms of access or amenity or living conditions; and
- whether the proposed new use would provide a social or community service or function which outweighs the loss of the facility, meeting evidence of a local need. The criteria of Policy LP 49 Social and Community Infrastructure will be applied when assessing the loss of a pub.

18.55 Applicants should also have regard to the Campaign for Real Ale's (CAMRA) Public House Viability Test.

19 Increasing jobs and helping business to grow and bounceback following the pandemic



Policy 21

Protecting the Local Economy (Strategic Policy)

- A. The Council will seek to retain and attract investment from existing and emerging sectors to support the existing business base and create a diverse and enterprising local economy. New development proposals will be supported which:
1. Protect existing employment floorspace for office use, with a no net loss approach. Take an employment-led approach to any redevelopment for industrial use to meet local economic needs through intensification of the existing employment floorspace.

2. Direct major new employment development to the designated Key Business Areas and Locally Important Industrial Land and Business Parks and to the town centres, as identified on the Policies Map. Other employment floorspace of an appropriate scale may be located elsewhere.
3. Any major new development should explore the opportunity to create ground floor industrial provision to address local needs, particularly in town centres and other locations with high accessibility (PTALs 3-6).
4. Provide a range of commercial unit types, that are flexible and adaptable to changing needs, suitable for subdivision and configuration for new economic uses and activities for a range of occupiers;
5. Ensure there is a supply of affordable workspace that is well-designed, flexible and adaptable, to support small and medium sized enterprises or the voluntary and community sector in the borough, as identified in Policy 25 'Affordable, Flexible and Managed Workspace'; and
6. Strengthen the pathways through education and learning into jobs and careers for residents, supporting employment and training skills to maximise local employment opportunities, as identified in Policy 50 'Education and Training (Strategic Policy)'.

19.1 Richmond borough has been relatively resilient to the economic pressures of recent years however, whilst employment capacity has improved in terms of jobs, there have been significant losses in employment land and premises despite strong restraint policies. The continued loss of office stock and industrial land from the borough at past rates is unsustainable. The policy approach in this Plan therefore provides protection against the loss of existing office floorspace and industrial land, encourages its renewal and modernisation, and seeks additional provision, which is vital in terms of local economic and environmental sustainability objectives to create and maintain a sustainable economy. This approach is supported by the Borough Employment Land & Premises Needs Assessment.

19.2 We want to move towards creating a more self-sustaining borough, where education, training and job opportunities are available and all residents have access to those opportunities and other services without the need to travel far, or which are accessible by sustainable forms of transport. Therefore, it is important that employment land is retained close to residential areas to provide a choice of employment opportunities within the borough now and in the future.

19.3 The Council is required to plan positively for employment land by providing support for existing and new employment sectors. This

policy seeks to protect existing employment land within our designated employment areas. In the borough context it is common for employment to be within mixed use areas, because of historic development patterns, resulting in it being dispersed across the borough in a fragmented way. However, this does not provide justification for a change of use, as mitigation can address impacts and constraints such as narrow access, which have been managed by existing occupiers, and therefore do not prevent any future or continued employment use. This is also supported by the Agent of Change principle set out in the London Plan Policy D13 and Policy 53 'Local Environmental Impacts'. In addition, changes to ways of working, servicing and delivery do mean the ways businesses operate are changing. The policy approach is to make efficient use of land by encouraging employment-led intensification.

Changing work styles

19.4 Structural changes in the way offices are viewed in many growth sectors as places for interaction and collaboration, rather than places to go and work at a fixed desk has resulted in a rise in agile working practices such as working from home, hot desking, and shared workspace models – all of which enable the more efficient use of space. This trend was particularly prevalent during the pandemic and may continue. As such, this may reduce the extent to which new jobs

need additional dedicated office floorspace, however the long-term impacts remain uncertain and there is a need to plan for economic recovery. In Richmond the evidence base highlights that the lack of sufficient employment floorspace provision is a constraint on the future employment and business growth in the borough, but in recognition of work trends, it is felt that significant jobs growth could be delivered through the refurbishment and upgrading of outdated stock, to better facilitate such working practices. A new generation of industrial and workshop style provision could also meet future industrial needs but also work for office uses, and be used flexibly as businesses grow and adapt.

- 19.5** Proposals for intensification and re-purposing of existing employment land should consider the location and its character. Site proposals should be well designed, readily available and adaptable to meet changing business needs and should have regard to operational requirements (including servicing) and mitigate impacts on the transport network where necessary.

Permitted Development Rights

- 19.6** The Council has made an Article 4 Direction to remove permitted development rights for a change of use from Class E to residential. This covers large parts of the designated employment locations for offices and industrial land and non- designated

employment land and premises, identified for their contribution to the overall employment land. It is the Council's intention to continue to enforce its Article 4 Direction to require development involving the loss of employment floorspace to go through planning permission.

Affordable, Flexible Workspace

- 19.7** Richmond is an enterprising borough; with one fifth of the working age population self-employed and more businesses surviving three years compared to elsewhere in London. Overall, the borough has been relatively resilient to the economic pressures of recent years; however, there are some economic challenges, particularly as a result of limited land availability for employment purposes, and a shortage of office space across the borough leads to increases in rental values and costs for local businesses. The promotion of flexible and affordable workspaces allows us to respond to changing business needs and create robust, future-proofed places, including successful town centres and the promotion of local supply chains and local employment hubs which support the spatial strategy and the living locally concept. The Council will support provision of small units to accommodate a variety of local businesses and small firms at existing employment locations and to provide the opportunity for residents to set up their own enterprise, enabling them to work closer to home.

Policy 22

Promoting Jobs and our Local Economy

- A. Proposals for employment floorspace should support suitable workspace for the borough's locally significant and diverse sectors, in accordance with London Plan Policy E8, including those of particular importance to the borough's local economy:
1. Flexible workspace hubs including co-working space and serviced offices in the borough's suburban town centre locations;
 2. Space to accommodate small and micro firms, for start-up, incubation and accelerator with corresponding business support;
 3. Voluntary, community and local healthcare organisations;
 4. Media and creative industries;
 5. Scientific research and laboratory space;
 6. Theatre, television and film studio capacity;

floorspace within major mixed-use schemes and commercial schemes and the workspace must remain affordable for a minimum of 15 years. Affordable workspace is considered to have a rent and service charge of less than 80% of comparable local market rates, however market rates will vary according to a range of factors such as location within the borough, the quality and type of stock. As part of a proposal, there will need to be an assessment of local evidence relating to the specific location of the proposal and its target market, with a focus on rents or charges which are accessible for early-stage businesses, and justifies the discount that is proposed.

secured through a Section 106 Agreement in line with the guidance in the Council's Planning Obligations SPD.

Off-site provision of affordable workspace

- 19.49** A Workspace Management Plan will be required to set out the details of how the affordable workspace provision will meet the requirements of the policy. This will be

- 19.50** New affordable workspace should normally be provided on-site. This is to ensure that the workspace is provided in a range of locations across the borough, including those higher value areas where certain occupiers may struggle to find suitable, affordable premises. Only in exceptional circumstances, where it can be demonstrated robustly that this is not appropriate or feasible to do so, the Council will consider whether there are alternative interventions that achieve equivalent or higher value and impact through an off-site contribution. This may be through a financial contribution towards existing and/or new similar facilities nearby that is considered to directly mitigate the impact of the development and therefore meet the tests for a Section 106 contribution.

Policy 26

Visitor Economy

- A. The Council will support the sustainable growth of the visitor economy for the benefit of the local area by:
1. supporting proposals which promote and enhance the borough's existing tourist attractions, including the unique, historic and cultural assets that are connected via the River Thames, such as The Royal Botanic Gardens, Kew, Ham House and Hampton Court Palace;
 2. proposals that lead to increased visitors and tourists need to be of an appropriate scale for the size of the centre and will be assessed against the transport policies of this Plan;
 3. requiring accommodation and facilities to be accessible to all; either 10% of hotel bedrooms should be wheelchair accessible or 15% of new bedrooms to be accessible rooms as set out in London Plan Policy E10;
 4. enhancing the environment in areas leading to, within and around visitor destinations where appropriate;
 5. supporting the Cultural Quarters in Richmond and Twickenham and other existing clusters of cultural facilities and creative industries, particularly in town centres, and where ancillary facilities are proposed that are open for public use (such as restaurants, gyms and conference facilities).
- B. In relation to visitor accommodation:
1. proposals which result in the loss of bedspaces will be resisted;

2. proposals which increase the number of bedspaces will be supported subject to other Local Plan policies;
3. proposals will be supported which contribute towards providing a range of visitor accommodation, including small independent hotels and bed and breakfast accommodation, or short-term accommodation with stays not exceeding 90 days, subject to other Local Plan policies.

19.51 The Council recognises the value of the visitor economy both to the local and London economy. The COVID-19 pandemic has impacted on travel, particularly overseas visitors, and uncertainty has affected the sector. However in the short-term there has been growth in a stronger staycation market, with the Mayor's recovery plans including a 'Let's Do London' campaign in 2021. There could be a flexible approach to enable temporary uses in exceptional circumstances; however the protection of the existing stock of visitor accommodation is considered vital given the borough's rich visitor and cultural infrastructure. The Council's vision for our arts, libraries, parks and sport and fitness services set out in Culture Richmond 2021 – 2031 aims to support the growth of culture and creativity in the borough, while adapting to be resilient. A refreshed Visit Richmond Strategy to support local centres and the visitor economy was agreed to be undertaken by the Council in February 2022, including to invest in a new Visit Richmond marketing campaign.

19.52 The borough is a popular destination for visitors to traditional attractions such as the historic houses and gardens, the River Thames as well as the rugby-related attractions and associated facilities such as restaurants and shops. Parts of both Richmond and Twickenham town centres have existing cultural areas with clusters of existing uses, defined as Cultural Quarters in the theme 'Shaping and supporting our town and local centres' that can be a focus for improving the offer to visitors, bringing opportunities to stimulate vibrancy and viability and promote diversity, through linked trips and providing additional public uses (with access secured through a legal agreement) that form a destination as well as providing local job opportunities. The London Plan sets

out that the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted, in Policies E10 and HC5. The Council will expect the major attractions including Twickenham Stadium and the Stoop (Harlequins) to be developed in accordance with the Site Allocations set out in this plan.

19.53 The Council will encourage the provision of accommodation to enable visitors to stay longer and spend more. Major new hotel development will be expected to be located within town centres in the first instance as in Policy 18 Development in Centres, which also sets out guidance on the appropriate location and scale of hotel development. London Plan Policy E1 seeks an additional 58,000 bedrooms of serviced accommodation by 2041, with boroughs in outer London expected to plan proactively for new accommodation and the London-wide evidence base reflects boroughs take a share of the London supply projection. The GLA published a Technical Note in 2022 ⁽⁵⁾ which updates hotel accommodation projections. It was recognised that although forecasting was difficult, it was nevertheless expected that tourism would return to its pre-crisis levels by the middle of the decade. Therefore, proposals which increase the number of bedspaces will be supported, subject to other Local Plan policies, where they contribute to meeting the London Plan target.

19.54 The London Plan also requires visitor infrastructure to contribute to improving the availability of accessible serviced accommodation, as vital to ensure that as many visitors as possible can stay in London and experience its visitor attractions and business offer. London Plan Policy E10 has a policy requirement which allows developers to select between two options based on which

best fits the scale of development proposed. These requirements aim to recognise the need not only for standard wheelchair accessible rooms, but also rooms suitable for people with ambulant mobility impairments or older people who could benefit from additional access features, as well as rooms suitable for people who require assistance or who require a carer.

19.55 In determining applications for hotel development the Council will be mindful of the impact of the development on amenity, living conditions, parking, servicing and transport. It will be taken into account whether any ancillary facilities within the hotel, such as a gym, are open for public use.

19.56 The Council will work with its partners to promote the borough as a tourist destination. It is also recognised that major events held within the borough attract very large numbers

of people, and the Council will continue to work with partners, including public transport operators and event organisers, to promote sustainable travel choices and minimise disruption to residents and local businesses where possible.

19.57 In addition, proposals will be assessed in the context of maximising housing delivery, including affordable housing. In existing residential areas, there will need to be consideration whether a proposal for visitor accommodation would compromise capacity to meet the need for conventional dwellings. As set out under Policy 14 Loss of Housing, short-term holiday rented accommodation can be beneficial in providing for short-stays in sustainable locations, such as town centres and areas better served by public transport, however using for more than 90 days a year will be resisted where there is a detrimental impact on the existing housing stock.

Policy 27

Telecommunications and Digital Infrastructure (Strategic Policy)

- A. The Council will promote the enhanced connectivity of the borough through supporting infrastructure for high speed broadband and telecommunications including next generation technology such as 5G and full fibre broadband connections. New development is expected to provide for full fibre and mobile connectivity in accordance with London Plan Policy SI 6 part A.
- B. Applications for telecommunications development (including for prior approval under Part 16 of the General Permitted Development Order, or any other such future Order) will be considered in accordance with national policy and guidance and the following:
 1. The applicant will need to submit evidence to demonstrate that all options for sharing of existing equipment, including with other operators, and erecting masts on existing tall buildings or structures, have been fully explored before considering the erection of new structures or facilities.
 2. Visual impacts of telecommunications proposals should be minimised, including in line with Policy 28 'Local Character and Design Quality (Strategic Policy)', particularly on roof tops.
 3. The applicant has demonstrated that the development will operate within the International Commission on Non-Ionizing Radiation Protection Guidelines for public exposure.

19.58 National policy sets out guidance on the provision of high quality communications infrastructure, which is essential for sustainable economic growth. Modern telecommunications systems are an essential component in today's economy. Digital

technology has the ability to transform how businesses operate with flexible working and more web communication expected to continue their popularity particularly due to the increase in home working.

Policy 28

Local Character and Design Quality (Strategic Policy)

- A. The Council will require all development to be of high architectural and urban design quality. The character and heritage of the borough has been identified in the borough-wide characterisation work undertaken as part of the Urban Design Study. The 'places' as identified in the Study will need to be maintained and their character enhanced where opportunities arise. Development proposals will have to demonstrate a thorough understanding of the site and how it relates to its existing context, including character and appearance, and take opportunities to improve the quality and character of buildings, spaces and the local area.
- B. To ensure development respects, contributes to and maximises opportunities to enhance the local environment and character, proposals must reflect and demonstrate the following principles:
1. Ensure the proposal is compatible with the local character, including the relationship to existing townscape, development patterns, views, local urban grain and frontages as well as scale, height, massing, density, landscaping, proportions, form, materials and detailing;
 2. Ensure the development provides a high-quality sustainable design, construction and layout, including adaptability to climate change whilst responding positively to the local character as identified in the Urban Design Study and Conservation Area Appraisals/Statements;
 3. Use a design-led approach to optimise the potential of a development site through layout, siting and access arrangements, to ensure the development integrates positively with its surroundings;
 4. Ensure the development takes account of the existing urban grain and development patterns, including relationship of heights to widths;
 5. Sympathetically upgrading and reusing existing buildings, rather than demolishing and building new, allows a better response to the local character whilst also making substantial energy savings due to the embodied carbon in existing buildings that would otherwise be lost through demolition (see also Policy 4 'Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)');
 6. Ensure the development responds to and where possible improves existing patterns of movement, permeability and street widths that encourage and promote active travel and well-being;
 7. Maximise opportunities for urban greening, and integrate existing and incorporate new natural features into a multifunctional network that supports quality of place and biodiversity, which address climate change and resilience;
 8. Ensure public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain (as set out in London Plan Policy D8);
 9. Ensure the design, layout and materials respect and respond to the historic environment and any relevant heritage assets;
 10. Ensure developments achieve the highest standards of accessible and inclusive design, in accordance with London Plan Policy D5, with the aim of providing connectivity and permeability throughout (as such gated developments will not be permitted);
 11. Minimise opportunities for crime and antisocial behaviour, based on an understanding of the locality and site-specific circumstances, utilising principles of natural surveillance and orientation of buildings as well as uses, with all major development expected to meet the standards and objectives of the Secured by Design initiative;
 12. Consider the holistic impact on the local suitable microclimate, including as a result of lighting features; and
 13. Ensure the development's proposed uses are suitable and compatible for the proposed location, providing a mix of uses including local services and facilities to support daily life and enable

communities to 'live locally' in accordance with Policy 1, taking account of any potential adverse impacts of the co-location of uses through the layout, design and management of the site.

- C. All proposals, including extensions, alterations and shopfronts, will be assessed against the policies contained within an adopted neighbourhood plan where applicable, and the advice set out in the Urban Design Study and the relevant Village Planning Guidance and other SPDs relating to character and design.

Shopfronts

- D. The Council will resist the removal of shopfronts of architectural or historic interest. Shopfronts, including signage and illumination, should complement the proportions, character, materials and detailing, surrounding streetscene and the building of which it forms part. Blinds, canopies or shutters, where acceptable in principle, must be appropriate to the character of the shopfront and the context within which it is located. External security grilles and large illuminated fascias will only be allowed in exceptional circumstances. In sensitive areas, such as Conservation Areas and relevant Character Areas as identified in the Urban Design Study and the Village Planning Guidance SPDs, rigid and gloss finish blinds will generally be unacceptable.

Advertisements and hoardings

- E. The Council will exercise strict control over the design and siting of advertisements and hoardings to ensure the character of individual buildings and streets are not materially harmed, having regard to the interests of amenity and public safety (including highway safety).

Urban Design Study

20.1 As part of the development of the Local Plan, the Council has carried out an Urban Design Study, which shows a greater understanding and appreciation of the existing character of the different places of the borough. The Urban Design Study divides the borough into high-level 'Places' and lower level 'Character Areas', each with its own distinctive character, evolution and series of neighbourhoods. The identification of places has been informed by a comprehensive process involving the analysis of existing planning designations, built form characteristics and historical evolution of areas. The process has also been informed by the existing Village Planning Guidance SPDs.

20.2 The borough-wide characterisation work in the Urban Design Study considers what makes one area distinctive from another, what qualities are significant and critical to local character, and why is a particular townscape or landscape important, and to whom. The characterisation work creates a background against which new development can be balanced with protecting and

enhancing what makes Richmond as a borough so special in line with guidance on delivering good design through the planning process in Local Plan Policy 44. It is expected that applicants and developers follow the guidance and advice set out in the Urban Design Study and the Village Planning Guidance SPDs when considering the design- and character-led approach to development.

Village Planning Guidance SPDs and Conservation Area Appraisals

20.3 Village Planning Guidance SPDs were developed for all areas of the borough, (with the exception of Ham and Petersham, where there is an adopted Neighbourhood Plan for the area). The SPDs identify the key features and characteristics of the village areas that are valued by local communities. Within the SPDs, each area has been subdivided into Conservation Areas and Character Areas, and for each area the context, character and local features have been analysed and assessed.

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.

20.5 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. These focus on protecting and improving the quality of the local built environment and provide the necessary detail to assess context, local character and design quality. The Council will consider producing further supplementary planning document(s) or toolkits to inform small site design expectations on residential-led projects, along with updates to the Design Quality SPD (2006) and Small and Medium Housing Sites SPD (2006).

Design quality and character

20.6 This policy requires developers and applicants to take a sensitive approach to the architectural design of new buildings, extensions and modifications to existing buildings, as well as landscape proposals. The Council does not wish to encourage a particular architectural style or approach but expects each scheme to be to a high-quality standard, with very high quality expected within Conservation Areas. Schemes should be based on a sound understanding of the site and its context, following the locally specific guidance set out in the Urban Design Study, complemented by the Village Planning Guidance SPDs. This locally based approach that is sensitive to an area's character can also contribute to achieving the Council's objectives relating to climate change, biodiversity and living locally.

20.7 Developments should demonstrate an appreciation and understanding of vernacular, local character and architectural precedents in the local area, whilst not preventing or discouraging appropriate innovation and design. Given the built-up nature of the borough, it is anticipated that most new buildings will be as a result of redevelopment where compatibility with the existing urban fabric is a key consideration. The purpose is

to maintain, reinforce and where possible enhance the local character and features that give the area its distinctive and clear identity. Opportunities should be taken to improve the general level of design of an area where appropriate. New development should respect existing street and development patterns.

20.8 Policy D1 of the London Plan addresses the issue of understanding character and context, noting that an understanding of the character of a place helps to ensure an appropriate balance is struck between existing fabric and any proposed change. As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive.

Materials and façade design

20.9 The Council will expect the use of high-quality and sustainable materials, urban greening and biodiversity features as well as planting and landscaping reflecting the local character and distinctiveness of an area in all schemes where this contributes positively to the appearance and character of an area. The degree of symmetry, variety, colours as well as the pattern and proportions of windows and doors, materiality and their details together influence the design quality and character of a building and place.

20.10 The choice of building materials should mitigate the contribution to the urban heat island effect through thermal radiation as well as release of anthropogenic (waste) heat, having regard to Policy 4 Minimising Greenhouse gas emissions and promoting energy efficiency.

Relationship to other buildings

20.11 The space between buildings should be respected and development be in harmony with surrounding buildings. Elements such as windows, roofs, shopfronts and doors should relate to one another in such a way as to maintain or complement the proportions of the surroundings, particularly as expressed in the relationship between solids and voids. Landscape design (including hard and soft landscaping) and the intended use of any open spaces must form an integral part of

any proposals. Particular attention needs to be given to the interface between the public and private space and how a development will connect or relate to the wider open space network.

- 20.12** Modern shop and office layouts should be integrated with the proportions of surrounding development in order to reduce any potential visual impact. Development should be in scale with the adjoining buildings and in proportion with the average street width as defined by building frontages which reflect the urban grain, as required. Where uniform building heights are part of the character of a street it will not normally be appropriate to permit abrupt variations to the general roof line or eaves line, while in other areas irregular building heights may be appropriate.

Public realm

- 20.13** Developments should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain, as set out in London Plan policy D8. Proposals should ensure that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm. This includes having active frontages at ground floor, with the main access provided along the frontage facing primary streets. Depending on the development and its location, public realm and public spaces should support a wide variety of activities and create places where people want to go to, meet and socialise. Public realm and public places directly contribute to local identity and character. Applicants should refer to the detailed guidance in the Council's Public Space Design Guide.

- 20.14** For a mixed-use scheme, it is preferred that the ground floor contains commercial or community uses, having regard to the location of the site. Where practicable, buildings with ground floor non-residential use should supplement the existing public realm through the incorporation of public spaces such as plazas at their entrance. In case of tall buildings located close to the street edge, proposals should incorporate measures to

soften their edges and provide positive public spaces at their base through the use of generous walkways and mature planting.

Access and layout

- 20.15** New development, including new routes and access arrangements, should be appropriately integrated with the existing area, street frontage and existing local routes. The applicant will have to demonstrate how new development relates to the existing public transport, pedestrian and cycle networks and how it fosters social inclusion. Where required, development proposals should maintain through-access for ease of pedestrian movement and permeability.
- 20.16** Gated developments, which prevent permeability of sites, will be resisted and pedestrian and cycle links through new development must be publicly accessible at all times.

Secured by Design

- 20.17** The Secured by Design scheme has proven results in reducing crime and fear of crime, resulting in significant reductions in burglaries and criminal damage on new build and major refurbishment projects. The scheme is also successful in reducing anti-social behaviour through a wide range of measures including robust communal door standards, access control and careful design and layout of new homes. Applicants are encouraged to consult with the Metropolitan Police designing out crime officers at the earliest opportunity and include details of security and Secured by Design compliance within Design and Access Statements.

Microclimate and lighting

- 20.18** Consideration should also be given to the local microclimate created by buildings. Well informed design decisions at an early stage, such as the orientation of a building, can reduce energy consumption through responding positively to climatic conditions. The design should avoid lighting features that negatively impact on biodiversity or surrounding buildings (particularly residential), as well as on night-time vistas and panoramas. The building façade design and

glazing should consider the building use at night and minimise light spill that can exacerbate light pollution, and should avoid any harsh solar glare onto any public areas as well as surrounding development. Where required, shade analysis should be carried out to ensure that the building shadow does not adversely impact solar gain and thermal comfort in key public spaces during times of busy use.

- 20.19** The lighting of the public realm needs careful consideration to ensure it is appropriate to address safety and security issues, and make night-time activity areas and access routes welcoming and safe, while also minimising light pollution and thereby impacts on biodiversity, protected species as well as residential amenity.

Co-location and compatibility

- 20.20** Proposals should demonstrate that the proposed uses and activities are suitable and compatible with each other and surrounding land uses. Providing a mix of uses including local services and facilities that support daily life are important to accord with the Policy 1 on Living Locally and the 20-minute neighbourhood. The Council will give consideration to the mix of uses proposed and how they will support and connect with the local area through the layout, design and management of the site. Suitable uses will depend on the location and could include a combination of residential, retail, office, leisure and entertainment uses. It is not always necessary to include residential within a mixed scheme, and in some circumstances the inclusion of residential might impact on the operation of other uses.

Shopfronts and shop signs

- 20.21** Shopfronts of architectural or historic interest make an important contribution to the character and appearance of the borough. Therefore, the Council will resist the removal of shopfronts of architectural or historic interest. The design of new, and alterations to existing, shopfronts is important both to the appearance of the individual property and to the character and appearance of its local area. Any proposal will therefore be assessed

against relevant guidance in the Urban Design Study and Village Planning Guidance SPDs, as well as the Shopfronts SPD.

- 20.22** Poorly sited or badly designed shop signs, including projecting signs, and illumination can have a detrimental effect on the amenity (including character and appearance) of an area; on the living conditions of residents; on biodiversity and protected species, and may raise issues of public safety. Security shutters can impact on the visual appearance of an area and can create a hostile environment. The Council will welcome proposals from groups of shops to add character to the street scene by the use of harmonious high-quality design, colours and materials for their shopfronts.

Advertisements and hoardings

- 20.23** Advertising can enhance the appearance and vitality of a street. However, it can also cause considerable damage to visual amenity by cluttering the built environment and detracting from the quality of the area. Advertisements (defined under the Town and Country Planning Control of Advertisements Regulations) include not only hoardings, but also devices such as blinds and canopies with lettering, flags with logos and balloons. In considering proposals for an advertising hoarding or other advertisement, including blinds and canopies where relevant, or in deciding whether to take action to remove an existing advertisement, the Council will have regard to the following criteria:

1. hoardings should be of good design and in scale with their surroundings and be of a temporary nature only;
2. any advertisement display must not have an adverse effect upon road traffic conditions and public safety;
3. advertising displays will not be permitted where they would have an adverse effect upon:
 - a Conservation Area;
 - listed buildings or Buildings of Townscape Merit;
 - views from or within open spaces or along the Thames riverside and its tributaries;

- views from or within open spaces or along the Thames riverside and its tributaries;
 - predominantly residential areas;
4. high level, brightly illuminated, or flashing advertisements will not normally be permitted, especially where they might disturb residents;
 5. proposals for digital advertising displays are encouraged to maximise energy efficiency.
- 20.24** As a general rule, advertisement displays will be restricted to shopping, commercial, industrial or transport locations, where they comply with the above criteria and do not cause excessive visual clutter. It must be borne in mind that the Council's level of control is limited and that a number of advertisements do not require formal consent.
- 20.25** The Council will use its powers to remove any harmful advertisement or hoarding erected without consent and where appropriate and practical, to challenge existing hoardings and advertisements that cause demonstrable harm to amenity or public safety.

Policy 29

Designated Heritage Assets

- A. The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal. The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, listed buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens, will be conserved and enhanced by the following means:
1. Give great weight to the conservation of the heritage asset when considering the impact of a proposed development on the significance of the asset.
 2. Total loss of or substantial harm to a listed building should be wholly exceptional and will therefore be refused unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss in line with national policy requirements.
 3. Resist the change of use of listed buildings where their significance would be harmed, particularly where the current use contributes to the character of the surrounding area and to its sense of place, unless it secures the optimum viable use and/or there are public benefits to outweigh the harm.
 4. Resist the removal or modification of features such as original structure, layout, architectural features, materials as well as later features that contribute to the significance of the listed buildings.
 5. Demolitions (in whole or in part), alterations, extensions and any other modifications to listed buildings should be based on a proportionate understanding of the significance of the heritage asset.
 6. Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within listed buildings, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development.
 7. Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists.

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 4. Resist the removal or modification of features such as original structure, layout, architectural features, materials as well as later features that contribute to the significance of the listed buildings.
 5. Demolitions (in whole or in part), alterations, extensions and any other modifications to listed buildings should be based on a proportionate understanding of the significance of the heritage asset.
 6. Require, where appropriate, the reinstatement of internal and external features of special architectural or historic significance within listed buildings, and the removal of internal and external features that harm the significance of the asset, commensurate with the extent of proposed development.
 7. Require the use of appropriate materials and techniques and strongly encourage any works or repairs to a designated heritage asset to be carried out in a correct, scholarly manner by appropriate specialists.

8. Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance, including their setting and/or views to and from the registered landscape.
 9. Protect Scheduled Monuments by ensuring proposals do not have an adverse impact on their significance.
- B. Resist substantial demolition in Conservation Areas and any changes that could harm heritage assets, unless it can be demonstrated that:
1. in the case of substantial harm or loss to the significance of the heritage asset, it is necessary to achieve substantial public benefits that outweigh that harm or loss;
 2. in the case of less than substantial harm to the significance of the heritage asset, that the public benefits, including securing the optimum viable use, outweigh that harm; or
 3. the building or part of the building or structure makes no positive contribution to the character or distinctiveness of the area.
- C. All proposals in Conservation Areas are required to preserve and, where possible, enhance the character or the appearance of the Conservation Area.
- D. Where there is evidence of intentional damage or deliberate neglect to a designated heritage asset, its current condition will not be taken into account in the decision-making process.
- E. Outline planning applications will not be accepted in Conservation Areas unless it can be demonstrated that the impacts of the development on the significance of the area can be fully assessed including views and vistas. The Council's Conservation Area Statements, and where available Conservation Area Studies, and/or Management Plans, will be used as a basis for assessing development proposals within, or where it would affect the setting of, Conservation Areas, together with other policy guidance, such as Village Planning Guidance SPDs.
- F. Sympathetic measures to make energy and carbon savings in historic and listed buildings are encouraged, by adopting a 'whole house approach' and understanding all the factors that affect energy use to avoid maladaptation. Any potential damages to the structure or heritage value, or impacting the setting of, historic buildings have to be avoided.

20.26 The borough is characterised by primarily low to medium-rise residential patterns, which has produced very attractive townscapes and is important to the borough's distinctive character.

20.27 The borough's exceptional historic environment is central to its character. Many parts of the borough are covered by Conservation Areas, including the majority of Richmond and Twickenham centres. The borough has 85 designated Conservation Areas and each area is accompanied by a Conservation Area Statement, which explains why and when it was designated, including a short history and a map showing the boundary. The borough's Conservation Area Statements and any other studies or appraisals, including the Village Planning Guidance SPDs, include details of many of

the most impressive and important buildings as well as audits of assets within the public realm, which are of heritage or aesthetic value. The Council has agreed a programme for prioritising reviews of the boroughs existing Conservation Area Appraisals and developing new Appraisals for those areas that do not yet have an existing one, which commenced in 2021. The Urban Design Study also provides a high-level character assessment of the borough, albeit not as fine-grained as other studies.

20.28 The borough has approximately 1,115 listed buildings, including some war memorials, four Scheduled Ancient Monuments as well as 14 Historic Park and Gardens that are on the Historic England Register of Historic Parks and Gardens, all of which make a significant contribution to the special character of the

borough. The borough is also home to the Royal Botanic Gardens, Kew World Heritage Site (see Policy 32 of this Plan).

20.29 New developments of an exceptional design, which respond to their local and historic context, can make a very positive contribution to the historic environment. It is important to retain not only the character, distinctiveness and setting of designated heritage assets within a Conservation Area, but also the interrelationship between buildings, how they relate to surrounding spaces and areas as well as whole or partial street views, including into and out of a designated area, park, garden or landscape.

20.30 Applications for development that affect designated heritage assets or their setting must:

1. Describe the significance of any heritage assets affected, including any contribution made by their setting; the extent of the setting will be proportionate to the significance of the asset. Appropriate expertise should be used to assess the significance of a heritage asset and its setting.
2. Demonstrate how the development protects, and where possible enhances, the setting, including views, gaps and vistas and any other features, as identified in the relevant Conservation Area Statement/Study and the views and vistas identified in the Policies Map, or in relation to a listed buildings, Scheduled Ancient Monument or Historic Park or Garden.
3. Set out how particular attention has been paid to scale, proportions, height, massing, historic building lines, the pattern of historic development, use, design, detailing and materials.
4. Conserve and retain original or historic garden or landscape features as well as architectural features such as windows, doors, chimney stacks, walls and gates.
5. Describe how the proposal retains the integrity and significance of the building as a whole, the location and hierarchy of rooms, historic floor levels, the structure of the building including foundations, fabric as well as features

such as original staircases, original roof structures and other features identified as being of significance.

6. Demonstrate that the proposal is of exceptional design that integrates with and makes a positive contribution to the historic environment; and
7. Take opportunities to reinstate missing features which are considered important to, or to remove additions or modifications that harm, the significance of the asset.

20.31 Outline planning applications will not be accepted within Conservation Areas because the character, appearance and distinctiveness of those areas can be dependent on the detail of developments.

20.32 Conservation Area Statements define and record the features which make each Conservation Area important. Together with the Village Planning Guidance SPDs, they include an analysis of historical development, layout, plot configuration, buildings, shopfronts, memorials, other street furniture, walls and boundaries, open land and civic space. Conservation Area Appraisals and Management Plans set out proposals for the preservation and enhancement of the character, appearance and distinctiveness of a Conservation Area. Applicants will be expected to demonstrate how the proposal complies with the relevant Conservation Area Appraisals, as well as the Village Planning Guidance SPDs, and any other relevant SPDs/SPGs adopted by the Council. These will also be used when assessing proposals within and/or affecting designated heritage assets. The level of detail provided should be proportionate to the importance of the heritage asset.

20.33 Heritage assets are irreplaceable and ill-conceived proposals can cause irreversible damage to the character and distinctiveness of the borough's high-quality townscape and landscape. Therefore, the partial or full demolition of a designated heritage asset, or its alteration, will only be considered acceptable where full justification has been provided to demonstrate that any harm or loss has been carefully weighed up against wider public benefits that might result from

the proposal. Careful and sensitive maintenance, management and reuse of heritage assets also saves embodied carbon and avoids the carbon dioxide of constructing new buildings.

20.34 It is the case that:

1. Substantial harm to, or loss of, a Grade II listed building, Park or Garden should be exceptional.
2. Substantial harm to or loss of designated heritage assets of the highest significance, notably Scheduled Monuments, Grade I and II* listed building, Grade I and II* Registered Parks and Gardens should be wholly exceptional.
3. Insensitive alterations to, or extensions to neighbouring developments of, listed buildings will not be allowed.

20.35 Listed buildings are best used for their original purpose and therefore the Council will resist the change of use of a listed building where this would harm its significance in relation to heritage interest and character. It is acknowledged that there may be circumstances where the original use has become obsolete and there may be cases where a change of use may be the only viable option to keep the designated heritage asset in active use. In such instances, the Council will take into account the desirability of sustaining and enhancing the significance of the heritage asset and putting it to a viable use consistent with its conservation. Where a change of use may be appropriate, sensitive adaptation of a historic building can be possible, but the onus will be on the applicant to justify the new use and to demonstrate how the benefits outweigh the harm of departing from other planning policies if applicable. Any proposed development, additional structures or buildings within the setting of the designated heritage asset, must only be the minimum necessary to secure the asset's long-term future. The applicant will also have to demonstrate that the new use will be compatible with the fabric, exterior, interior and setting of the designated heritage asset, and that it will not detract from other evidential, historic, aesthetic or communal heritage values.

20.36 Historic buildings have often survived for many generations; they are inherently sustainable having been, in most cases, well-constructed from high-quality, locally sourced materials. Their embodied energy (i.e. the energy expended and encapsulated within the fabric of a building in its construction) means that it is logical to retain and reuse them with sensitive and careful management. Given the ever-increasing challenges presented by the climate emergency, there is a need to ensure all our buildings, whether historic or modern, are more energy efficient. Applicants are strongly encouraged to consider strategies for saving energy in historic buildings whilst avoiding any potential damages to the structure or heritage value, or impacting the setting of, historic buildings. Each proposal will be assessed on a case-by-case basis, and depending on the significance of an asset, different levels of change may be appropriate in different types of buildings. Any strategies or technologies that don't harm the building's heritage value should be maximised. There are often simple and inexpensive measures to reduce energy consumption, such as reinstating existing and missing shutters and draught-proofing windows and doors through the use of sympathetic secondary glazing. Government regulations, research by Historic England as well as Building Regulations all suggest that substantial energy savings can be achieved without harming the heritage value of a building. For further information and guidance see Historic England's guidance on "Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency 2018" and "Energy Efficiency and Traditional Homes 2020".

20.37 It is acknowledged that some proposals may require residential development to support the restoration and reuse of designated heritage assets; however, such proposals must have benefits that outweigh the disbenefits of departing from other planning policies. The proposed development must be the minimum necessary to secure the designated heritage asset's long-term future.

20.38 Legislation places upon those who own or manage listed buildings an obligation to ensure that they are properly maintained.

Where appropriate, the Council will use its powers to ensure that this is done, particularly if the asset is on the Heritage at Risk register. Owners are urged to employ specialists to ensure the standard of workmanship in carrying out modifications or additions to designated historic assets is of high quality. A deteriorated state of an asset as a result

of deliberate neglect or damage is not taken into account when making decisions. Where the quality of a Conservation Area has been eroded, the Council will take steps to ensure that new development and other schemes such as works to the public realm enhance the historic environment.

Policy 30

Non-designated Heritage Assets

- A. The Council will seek to preserve, and where possible enhance, the significance, character and setting of non-designated heritage assets, including Buildings of Townscape Merit, memorials, particularly war memorials, locally listed historic parks and gardens and other local historic features.
- B. There will be a presumption against the demolition of Buildings of Townscape Merit.

20.39 The borough's exceptional historic environment is central to its character. Locally listed buildings, i.e. Buildings of Townscape Merit (BTM), and memorials (particularly war memorials, including those on private land or within buildings), locally listed historic parks and gardens, industrial sites and water courses, as well as other local historic features such as statues, plaques, horse and cattle troughs, historic bollards, post boxes and historic telephone boxes are historic assets worthy of protection.

20.40 Buildings of Townscape Merit are buildings, groups of buildings or structures of historic or architectural interest, which are locally listed due to their considerable local importance. The Council's Buildings of Townscape Merit SPD adopted 2015 sets out the criteria that will be taken into account when considering whether a building or structure should be designated as BTM. This policy sets out a presumption against the demolition of BTMs unless structural evidence has been submitted by the applicant, and independently verified at the cost of the applicant. Should demolition prove necessary, a high standard of design that complements the surrounding area will be required in any replacement building. Locally specific guidance on design and character is set out in the Conservation Area Appraisals, the

Urban Design Study and the Council's Village Planning Guidance SPDs, which applicants are expected to follow for any alterations and extensions to existing BTMs, or for any replacement structures.

20.41 In addition to the borough's 14 Historic Park and Gardens that are on the Historic England Register of Historic Parks and Gardens (see Policy 29 on Designated Heritage Assets), there are a number of historic parks and gardens that merit local listing due to their historic interest. The Council will use the London Gardens Trust Inventory as a basis for considering locally listing such parks and gardens in the borough.

20.42 Applicants will be required to:

1. retain the character of Buildings of Townscape Merit, war memorials, locally listed historic parks and gardens, and any other non-designated heritage assets;
2. submit a Heritage Statement to assess the potential harm to, or loss of, the significance of the non-designated heritage asset, including from both direct and indirect effects;
3. describe the significance of the non-designated heritage asset affected, including any contribution made by their

Where appropriate, the Council will use its powers to ensure that this is done, particularly if the asset is on the Heritage at Risk register. Owners are urged to employ specialists to ensure the standard of workmanship in carrying out modifications or additions to designated historic assets is of high quality. A deteriorated state of an asset as a result

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2. submit a Heritage Statement to assess the potential harm to, or loss of, the significance of the non-designated heritage asset, including from both direct and indirect effects;
3. describe the significance of the non-designated heritage asset affected, including any contribution made by their

setting; the extent of the relevant setting will be proportionate to the significance of the asset. Appropriate expertise

4. should be used to assess a non-designated heritage asset; and retain or restore the structures, features and materials of the asset, which contribute to its architectural integrity and historic interest.

Policy 31

Views and Vistas

- A. The Council will protect the quality of the identified views, vistas, gaps and the skyline, all of which contribute significantly to the character, distinctiveness and quality of the local and wider area, by the following means:
1. require development to avoid harm to the quality of the views and vistas as identified on the Policies Map, and for any proposal affecting a designated/identified view/vista on the Policies Map demonstrate this through the submission of computer-generated imagery (CGI) and visual impact assessments as required by Policy 44 'Design Process';
 2. resist development which interrupts, disrupts or detracts from strategic and local vistas, views, gaps and the skyline;
 3. require developments whose visual impacts extend beyond that of the immediate street to demonstrate how views are protected or enhanced, and reflect the relevant character area design guidance in the Urban Design Study;
 4. require development to avoid harm to the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background;
 5. seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured;
 6. seek improvements to views within Conservation Areas, which:
 - a. are identified in Conservation Area Statements and Studies and Village Plans;
 - b. are within, into, and out of Conservation Areas;
 - c. are affected by development on sites within the setting of, or adjacent to, Conservation Areas and listed buildings.

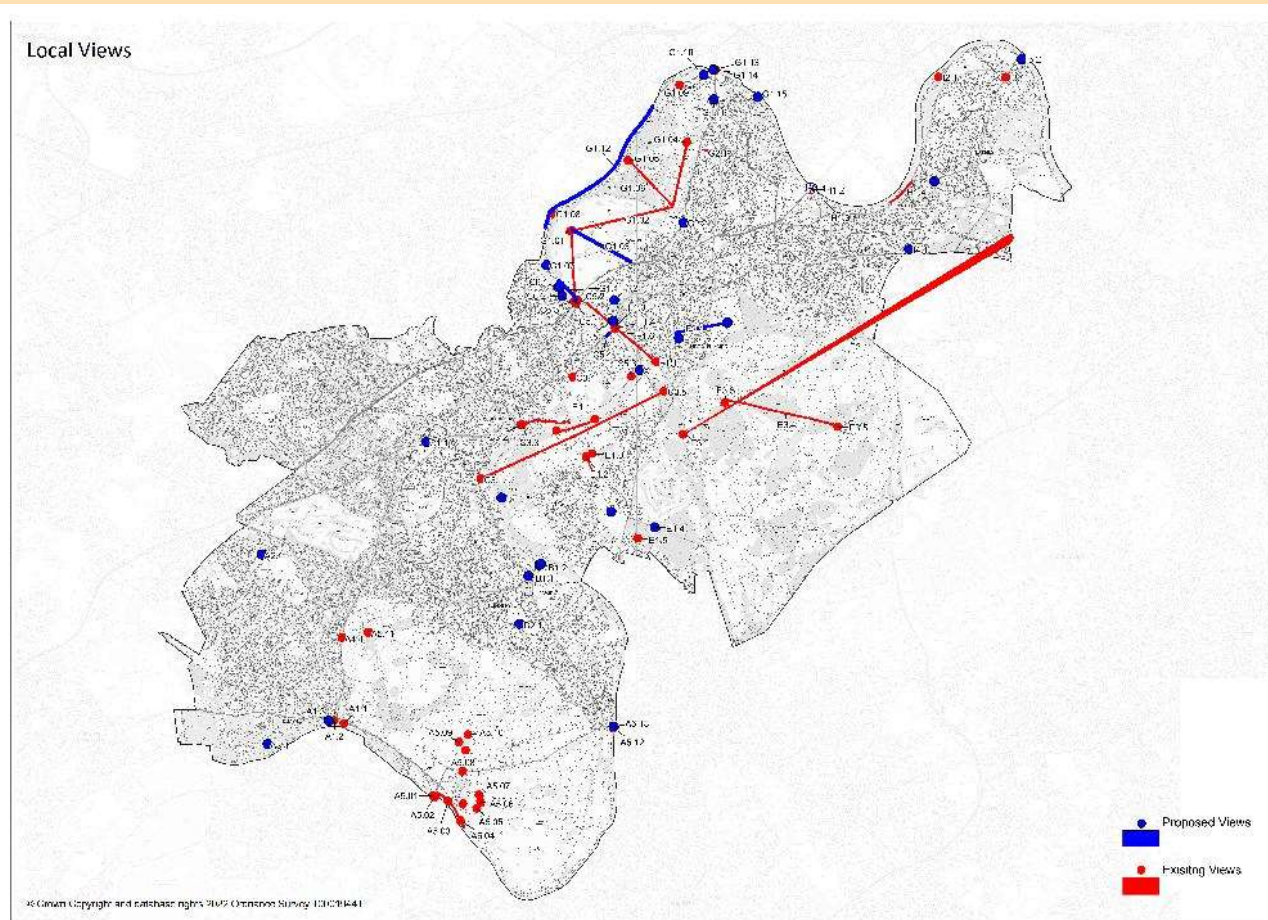
Policies Map designations

The existing views and vistas identified on the Policies Map will be retained. The Urban Design Study and further analysis identified additional local views which were consulted upon in a [Local Views SPD](#). These additional views are listed below, along with those raised in consultation responses which it is considered appropriate to designate, and will be designated through the preparation of this Plan.

- Hampton Court Road/ Thames Street (A308) towards Hurst Park (east) ([see draft SPD](#))
- Longford River ([see draft SPD](#))
- Platt's Eyot pedestrian bridge ([see draft SPD](#))
- Kingston Bridge (north) ([see draft SPD](#))
- Ferry Road ([see draft SPD](#))

- Teddington Lock Footbridge ([see draft SPD](#))
- Udney Park Playing Fields ([see draft SPD](#))
- May Road ([see draft SPD](#))
- Richmond Road, East Twickenham ([see draft SPD](#))
- St Margarets Riverside ([see draft SPD](#))
- Ham War Memorial ([see draft SPD](#))
- Thames Young Mariners
- Ham Common from Ham Avenues
- Richmond Green ([see draft SPD](#))
- Richmond riverside (northern bank) ([see draft SPD](#))
- Church of St Matthias ([see draft SPD](#))
- Buccleuch Gardens towards Richmond Bridge
- King's Observatory towards Richmond Town Centre ([see draft SPD](#))
- Gordon House, St Margarets Road ([see draft SPD](#))
- London Museum of Water and Steam, Brentford ([see draft SPD](#))
- Old Deer Park riverside ([see draft SPD](#))
- Kew Bridge (west) ([see draft SPD](#))
- Strand on the Green ([see draft SPD](#))
- Parish Church of St Anne, Kew Green ([see draft SPD](#))
- Kew Road towards the Great Pagoda ([see draft SPD](#))
- Chiswick Bridge (west) ([see draft SPD](#))
- Church of St Matthias, from Chiswick Bridge ([see draft SPD](#))
- Church of St Matthias, from East Sheen Cemetery
- Hammersmith Bridge from Barnes riverside ([see draft SPD](#))
- Priests Bridge ([see draft SPD](#))
- Barnes Pond from Church Road

Map 20.1 Local Views



20.43 The Council commissioned further analysis work to review the borough's views and vistas, alongside the Urban Design Study. The Urban Design Study sets out details of valued views and vistas, including the range of prospects, linear views, and townscape views, which are highly important including in the borough's riverside and open space settings. These are recognised in each character area profile, along with the design guidance strategy for each area. This further analysis has provided a baseline assessment of existing protected views and vistas, additional new locally important views that have been identified, as well as setting out opportunities to improve these. This forms the basis for a draft Local Views Supplementary Planning Document to clearly identify the protected views.

20.44 The quality and character of the views and vistas as shown on the Policies Map will need to be protected.

20.45 The presence of a view or vista will influence the design quality, configuration, height and site layout of new development or extensions to existing developments. Views may also need to be considered where the viewpoint is a long way from the development, such as in the case of views from Richmond Hill and numerous vantage points in Richmond Park. Where appropriate, improvements, such as opening up or enhancing views for the benefit of the general public where views have been obscured by fencing, buildings or overgrown trees, will be encouraged.

20.46 Applicants will be required to provide visualisations of the impact on views of proposals from agreed viewpoints with planning applications for major developments, as set out in Policy 44 Design Process. These Accurate Visual Representations (AVRs) will form part of the Townscape and Heritage Impact Analysis. The use of 3D modelling such as VUCITY is advocated.

- 20.47** The Richmond, Petersham and Ham Open Spaces Act (1902) prevents development of the land on and below Richmond Hill in order to protect the unique and distinctive foreground views that it provides to the west and south. This is the only view in England to be protected by an Act of Parliament. In addition, the view from King Henry VIII's Mound to St Paul's Cathedral is the subject of a Direction made by the Secretary of State as part of strategic guidance and is one of eight such strategic views of St Paul's across London. The protection and enhancement of the strategic view from King Henry's Mound to St Paul's will be achieved by consultation between the relevant planning authorities in London, including the Greater London Authority. The [London View Management Framework SPG](#) will be used when considering applications affecting protected views. The view will be managed by following the principles of London Plan Policy HC4 London View Management Framework.
- 20.48** It is important that the impact of development on views, including in and around Conservation Areas, as well as of landmarks defining points of townscape interest is taken into account. In addition to the strategic view from King Henry's Mount in Richmond Park to St Paul's Cathedral, the borough also has specifically recognised views and vistas that are important to protect.
- 20.49** The Council will work in partnership with neighbouring boroughs where there are cross-boundary views and settings so that these are positively managed.
- 20.50** Due to the unique natural and historic environment across the borough, there are many places with cherished local views, which can continually change and unfold, particularly seen in the riverside settings, around Greens and at a townscape level. If a local view is not designated, a development proposal would still be assessed against other relevant policies – such as the setting of designated heritage assets, river corridor and landscape designations, and wider local character and design considerations.

Policy 32

Royal Botanic Gardens, Kew World Heritage Site

- A. The Council will protect, conserve, promote and where appropriate enhance the Royal Botanic Gardens, Kew World Heritage Site (WHS), its buffer zone and its wider setting. In doing this, the Council will take into consideration that:
1. The World Heritage Site inscription denotes the highest significance to the site as an internationally important heritage asset.
 2. The appreciation of the Outstanding Universal Value of the site, its integrity, authenticity and significance, including its setting (and the setting of individual heritage assets within it) should be protected from any harm.
 3. Appropriate weight should be given to the current Royal Botanic Gardens, Kew World Heritage Site Management Plan.

- 20.51** The United Nations Educational, Scientific and Cultural Organisation (UNESCO) World Heritage Committee inscribes World Heritage Properties onto its World Heritage List for their Outstanding Universal Value – cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity. The Royal Botanic Gardens, Kew was inscribed on the UNESCO World Heritage Site List in 2003, in recognition of its outstanding and internationally significant universal value.

significance to a scheduled monument – and which are subject to the same policies as designated heritage assets – are known or likely to be present. A total of 31 Archaeological Priority Areas are identified for Richmond, of which 7 are a Tier 1 APA, 24 are Tier 2 APAs, and 1 is a Tier 3 APA. The [report](#) by GLAAS was completed in 2022

and there is a link to the latest Archaeological Priority Areas Appraisal and borough-wide overview maps on the Council's website.

21 Increasing biodiversity and the quality of our green and blue spaces, and greening the borough



Policy 34

Green and Blue Infrastructure (Strategic Policy)

- A. Green and blue infrastructure is a network of multi-functional green spaces and green features, green space stepping-stone sites as well as rivers and other watercourses, ponds, floodplains and wetlands, which provides multiple benefits for people, nature and the economy, and which plays a significant role in both mitigating and adapting to climate change.
- B. To ensure all development proposals protect and appropriately enhance and restore green infrastructure, the following will be taken into account when assessing development proposals:
 1. Protect and enhance the borough's blue and green infrastructure networks, in particular, but not exclusively, the sites designated as Green Belt, Metropolitan Open Land, Local Green Space, Other Open Land of Townscape Importance, other open spaces as well as areas designated for their biodiversity and nature conservation value.
 2. Protect and seek improvements to walking and cycling routes to and through the green infrastructure network, such as green spaces, and where opportunities arise create such routes, thereby promoting healthy lifestyles and active travel.
 3. Enhance the existing blue and green infrastructure network, including open spaces and green corridors, providing habitats for biodiversity to flourish and expand.
 4. Protect and enhance biodiversity within the green and blue infrastructure networks, particularly on sites designated for nature conservation interest, but also recognise the contribution that non-designated sites offer to increase biodiversity in the borough.
 5. Increase the provision of green and blue infrastructure in and around development sites through urban greening and other green and blue infrastructure features, ensuring they complement the surroundings and link into existing networks.
 6. Expect development to incorporate and maintain appropriate elements of green infrastructure which make a positive contribution to the wider network of open spaces.

7. Enhance accessibility to open spaces as well as to the blue infrastructure network, particularly to the borough's rivers and their banks, for recreational use, while ensuring that the biodiversity value is protected and enhanced in a measurable way.
8. Improve opportunities for local residents and visitors to experience nature and provide educational opportunities, both formal and informal, within the development, to allow the public to embrace their local environment and develop potential stewardship behaviours.
9. Make provision for the long-term sustainable maintenance and management of open space and green and blue infrastructure features on site, including supporting community involvement in stewardship of green and blue infrastructure networks, and ensuring there is space for growing food, including pollination and wildlife-friendly gardening.

21.1 This policy is the overarching strategic policy for the theme "Increasing biodiversity and the quality of our green and blue spaces, and greening the borough" and should be read alongside other policies in this Plan as well as the London Plan, particularly Policy G1 (Green infrastructure) and Policy G4 (Open space), the Mayor of London's [All London Green Grid SPG \(2012\)](#) (including the Frameworks for the Arcadian Thames, and the River Colne and Crane Area) and guidance set out in the Colne and Crane Valleys Green Infrastructure Strategy (2019). Urban greening entails more than just focusing on how the streets, buildings and other public spaces look. Roofs and walls covered in plants, street trees and small pocket parks in between buildings make our borough an even better place to live, work and invest. These green features act as part of the borough's green infrastructure network to help clean our air, reduce the risk of flooding and keep the city cool.

21.2 The borough is characterised by extensive areas of open land, designated as Green Belt and Metropolitan Open Land. The borough's rivers and their corridors link across borough boundaries and have a strategic function in southwest London, Greater London and beyond. The borough also benefits from highly significant historic landscapes, including those on the Historic England's national Register of Parks and Gardens, all of which make a significant contribution to the borough's green infrastructure network. In addition, there are many smaller pieces of open land, including land designated as Other Open Land of Townscape Importance, as well as non-designated land, such as

residential gardens. Therefore, the green spaces and green and blue features that contribute to and make up the overall green infrastructure network range from borough-wide and strategic features such as parks, watercourses and woodlands to local features such as playgrounds, sports pitches, allotments, public open spaces, trees, woodlands, private gardens and other green spaces used for recreational purposes. There are also other features such as highway verges, railway embankments as well as site-specific elements such as green roofs and green walls that are considered to be part of the wider green infrastructure network. It is important to recognise that the borough's parks and open spaces provide not only recreational opportunities for those that live and work in this borough, but also for local communities and residents in neighbouring and other London boroughs, thus providing a green lung for southwest London.

21.3 As set out in the Local Plan's spatial strategy (see Policy 2 'Spatial Strategy: Managing change in the borough (Strategic Policy)'), housing delivery and the infrastructure required to support it, is expected to be met without compromising the green and blue infrastructure network; there is a presumption against the loss of, or building on, greenfield sites. The leisure and recreational pressure on existing green infrastructure, including nationally and internationally designated areas such as Richmond Park and Bushy and Home Park, is acknowledged, and residential development is likely to exacerbate this pressure. There will be challenges in ensuring that the Council reaps all the benefits of having high quality, well maintained open

spaces and green infrastructure. The Council will work in partnership with key local stakeholders and partners (such as the Environment Agency, Mayor of London, neighbouring boroughs, the Royal Parks, major landowners such as the Crown Estates, Thames Water the Richmond Biodiversity Partnership, Habitats & Heritage, the Thames Landscape Strategy, the Thames Strategy and others) to ensure through careful management we achieve our shared aims in respect of the quantity, quality and positive impact of our green and blue assets for both people and wildlife.

21.4 Development which provides a greener environment can be more sustainable and deliver important environmental, social, health and economic benefits. The multifunctional nature of green and blue infrastructure means it contributes significantly to the value of the local area as a place to live, work, do businesses and visit. With the decline of biodiversity across the globe, it is vitally important that new features do not only offer a 'green space' but provide value by forming part of a larger ecosystem, helping to maintain biodiversity. For example, green corridors can be safeguarded for biodiversity by carefully considering any physical infrastructure installed, such as reducing the extent of artificial lighting where possible to protect species of bat present in the borough (see Policy 39 'Biodiversity and Geodiversity' and Policy 43 'Floodlighting and Other External Artificial Lighting '). Policy 8 'Flood Risk and Sustainable Drainage (Strategic Policy) ' also sets out that the Council encourages the return of currently engineered riverbanks to a more natural state where this is possible, which will in turn improve the quantity and quality of natural habitat in these locations. Green and blue infrastructure plays a significant role in both mitigating and adapting to climate change, with the ability for green infrastructure to capture and sequester carbon and pollutants within the vegetation and soils being perhaps the most crucial.

21.5 Green and blue infrastructure networks and features that make up the overall network can also support healthier and more active lifestyles by providing green routes for

walking and cycling, green spaces for recreation, exercise and play. Pedestrian and cycle routes across green spaces often form a strategically important part of the borough's cycling and walking. These routes enable active travel choices by connecting key destinations in the borough via convenient shortcuts and quiet routes away from busy roads. The coronavirus (COVID-19) pandemic has highlighted the importance of having access to green spaces within walking distance of homes. Pedestrian and cycle routes through green spaces should be protected and, wherever possible, provided to a high standard in accordance with best practice guidance. During the COVID-19 pandemic, visits to parks and other green spaces increased across London. It is important to protect and enhance the existing areas of open space in the borough, to ensure that as the population grows, there are good quality green spaces for everyone to enjoy.

21.6 The borough's network of green and blue infrastructure is critically important in helping to mitigate and adapt to the effects of climate change within the borough, given that areas of open water within the borough's river corridors, other wetland habitats and green spaces help to reduce the urban heat island effect by promoting urban cooling and reducing localised air temperatures. Green space areas also provide important storm water retention opportunities by minimising surface water run-off rates during severe rainfall storm events, and trees within the borough's green and/or wildlife or ecological corridors help promote urban cooling. Trees also provide increased shade cover during summer heatwaves and reduce levels of particulate urban air pollution. They also play a key role in helping to store carbon. Rising summer temperatures, prolonged summer heatwaves, and flash flooding due to severe extreme storm events are all likely to increase in frequency in London over the coming years as a result of climate change. The presence of a network of green spaces may reduce the likelihood of flooding by allowing water to permeate through the ground. Green infrastructure can also be designed to act as flood storage areas, holding large volumes of water in temporary ponds to protect built

up areas from flooding. The appropriate enhancement and protection of the borough's green and blue infrastructure networks is therefore considered critical in tackling the climate emergency.

21.7 Green corridors are linear natural infrastructure, containing trees and plants, that link to other typically larger green and open spaces to form a green infrastructure network. In order to make the borough more resilient to future climate change pressures and at the same time deliver measurable net gains for biodiversity (see Policy 39 'Biodiversity and Geodiversity'), the Council will encourage the creation of multi-functional green space wildlife or ecological corridors within new development site layouts which have a dual function as natural green space areas and also areas which help to mitigate the effects of climate change by promoting both sustainable urban drainage and urban cooling. For example, by encouraging the use of on-site natural green space, linear shaped dry swale Sustainable Urban Drainage Systems (SuDS), wildlife or ecological corridors, which incorporate areas of new tree planting.

21.8 Education about green infrastructure, particularly in urban areas where ecosystem services are intertwined with human

development, can include fundamental lessons about systems thinking, sustainability, and resilience. Therefore, developments should provide both formal and informal education opportunities within the site, such as through signage or information boards, or on large-scale developments through space for walks or outdoor education as well as spaces for growing food. This will allow the public to embrace their local environment and promote awareness on the benefits of green infrastructure, growing food and the importance of pollination and wildlife-friendly plants, thereby increasing public support, management, and stewardship of present and future green infrastructure projects.

21.9 Green infrastructure requires long-term management and maintenance, which should be considered at the earliest stages of design and planning. Outreach and education are fundamental to ensuring and preserving long-term benefits, particularly in relation to biodiversity conservation efforts. Management plans need to be flexible to accommodate changing needs of green infrastructure features, and management demands are likely to decrease once green infrastructure features and/or habitats have settled and established.

Policy 35

Green Belt, Metropolitan Open Land and Local Green Space

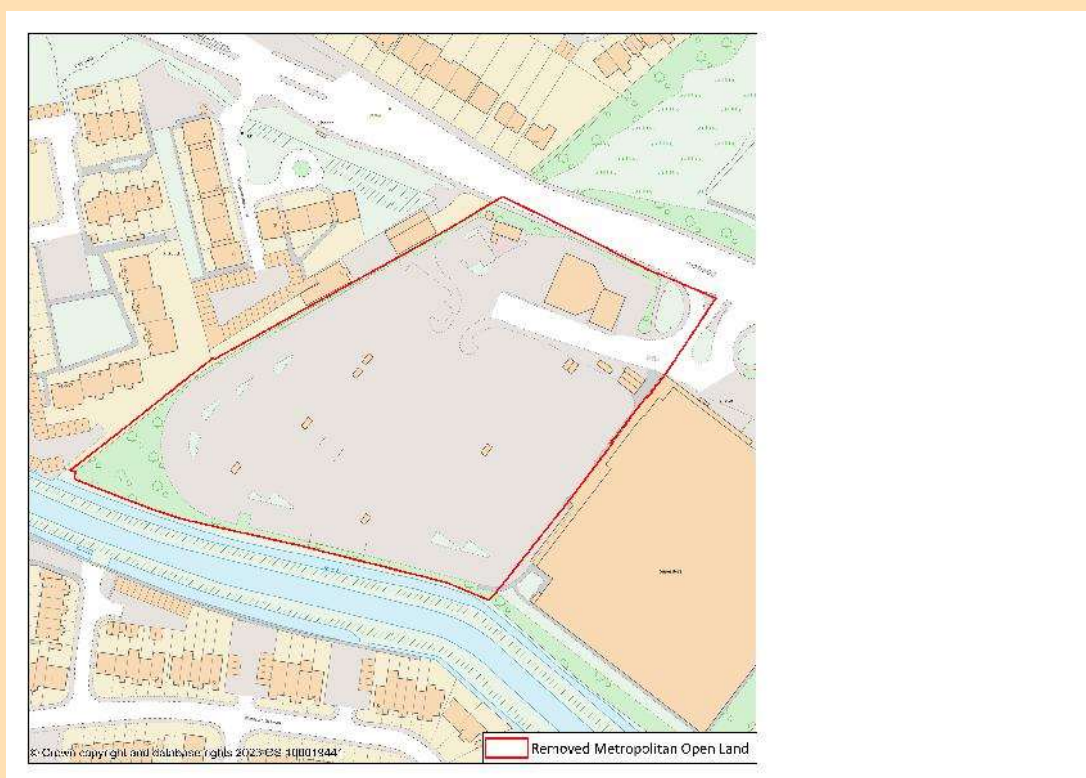
- A. The borough's Green Belt and Metropolitan Open Land will be protected and retained in predominantly open use. Inappropriate development will be refused unless 'very special circumstances' can be robustly demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land.
- B. Appropriate uses within the Green Belt or Metropolitan Open Land include public and private open spaces and playing fields, outdoor recreation and sport, biodiversity including rivers and bodies of water, open community uses including allotments and cemeteries. Development will only be supported if it is appropriate and helps secure the objectives of improving the Green Belt or Metropolitan Open Land, subject to national planning policy tests.
- C. 'Very special circumstances' must result in the improvement and enhancement of the openness, character and use of the Green Belt and Metropolitan Open Land. Measures could include improvements or enhancements to landscape quality (including visual amenity), biodiversity (including delivering biodiversity net gain) or accessibility.
- D. When considering developments on sites in proximity to Green Belt or Metropolitan Open Land, any possible visual impacts on the character, local distinctiveness, and openness of the Green Belt or Metropolitan Open Land will be taken into account.

Local Green Space (LGS)

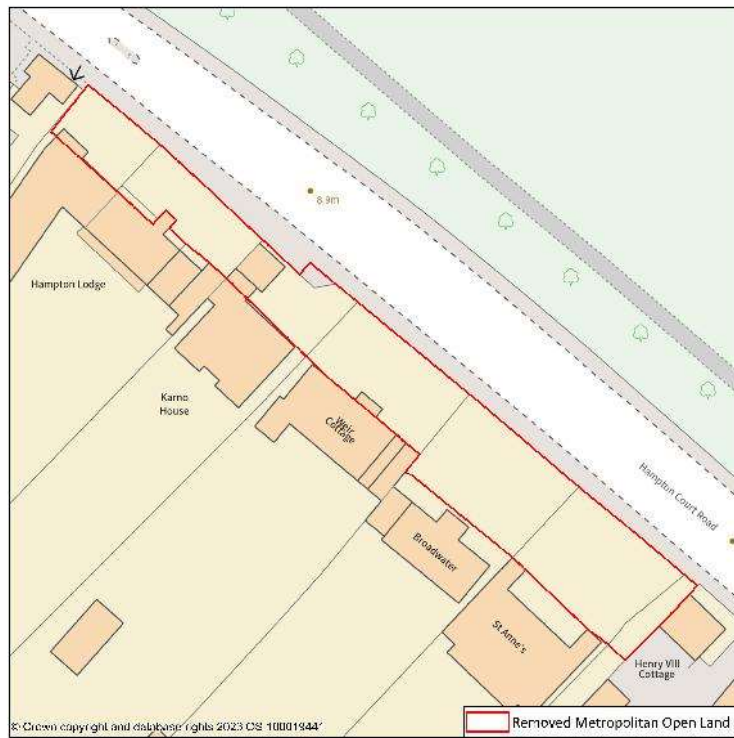
- E. Local Green Space, which is demonstrably special to a local community and which holds a particular local significance, will be protected from inappropriate development that could cause harm to its qualities.

Policies Map designations

- A. Further to the recommendations in the Open Land Review (Green Belt, MOL, LGS and OOLTI), on the following sites their MOL designation has been removed.
1. Carpark for Sainsburys, Uxbridge Road, Hampton (see Site Allocation 4 'Car Park for Sainsburys, Uxbridge Road, Hampton')



2. Parcel 48 of the Review: Front Gardens Hampton Court Road (East) - The parcel is a very small linear section comprising front gardens to residential properties along Hampton Court Road.



3. Parcel 49 of the Review: Front Gardens Hampton Court Road (West) - The parcel is a very small linear section comprising front gardens to residential properties along Hampton Court Road.



- B. Further to the recommendations in the Open Land Review (Green Belt, MOL, LGS and OOLTI), the following site(s) have been added as LGS:

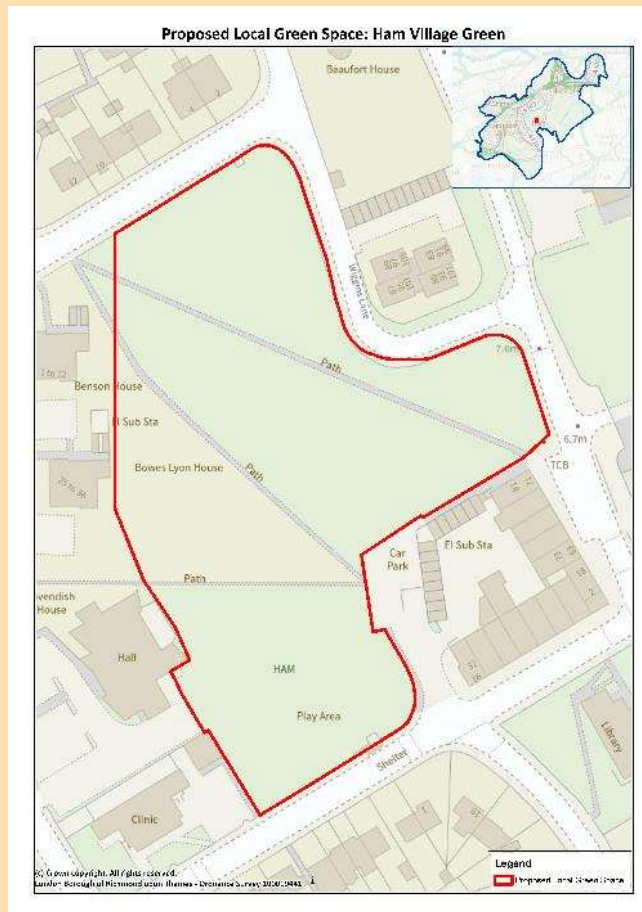
1. North Sheen Recreation Ground



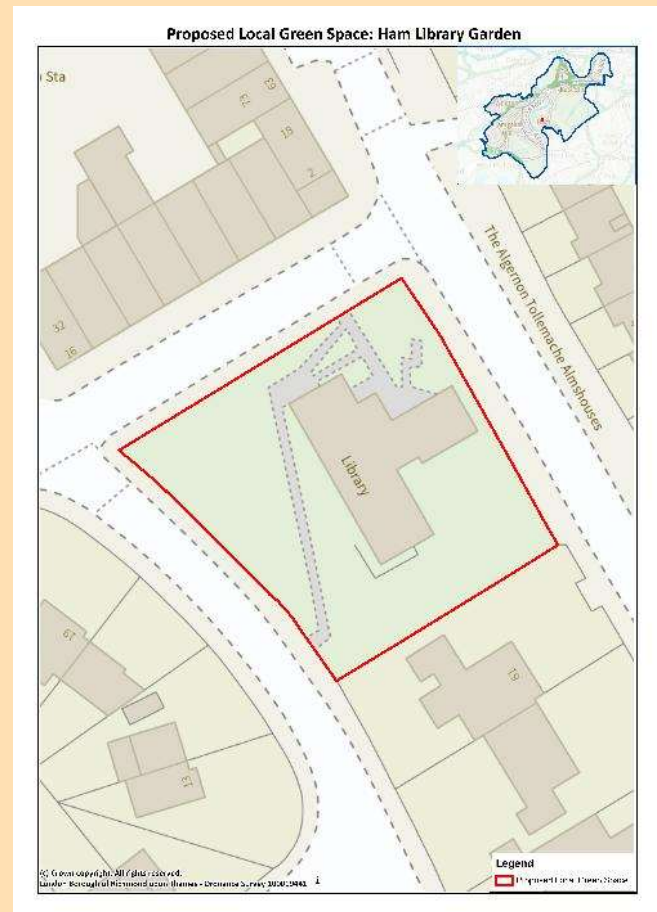
2. Raleigh Road Recreation Ground



3. Ham Village Green



4. Ham Library Gardens



5. Pensford Field Kew



6. Warren Gardens



21.10 The fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence. Metropolitan Open Land (MOL) is unique to London and protects strategically important open spaces within the built environment. This policy applies equally to Green Belt or Metropolitan Open Land. In addition, paragraphs 137 – 151 of the NPPF 2021 and any future amendments on Green Belts applies equally to MOL.

21.11 MOL is open land or water, either publicly or privately owned, with or without public access. MOL, as shown on the Policies Map, plays an important strategic role as part of the borough and London’s multi-functional green infrastructure network and improvements in its overall quality and accessibility are encouraged, including for a

range of users. Green corridors, including footpaths and open spaces that they link, are important to London’s green infrastructure network, providing opportunities for recreation and biodiversity, and are therefore designated as MOL due to their London-wide strategic importance.

21.12 National and regional policies, including this policy, apply to the borough’s areas designated as Green Belt(5) as shown on the Policies Map. National guidance sets out the functions of the Green Belt, its key characteristics and acceptable uses.

21.13 The purpose of this policy is to safeguard this open land and protect and retain it in predominately open use. There is a presumption against inappropriate development in the Green Belt or MOL, and inappropriate development by definition, is harmful to the Green Belt or MOL and should

not be approved except in very special circumstances. However, it is also recognised that there may be exceptional cases where inappropriate development could be acceptable, such as cycle storage or small scale structures for essential utility infrastructure. Water, wastewater treatment and sewage treatment plants, including any associated facilities, are considered to be essential utility infrastructure and facilities. New uses will only be considered if they are by their nature open or depend upon open uses for their enjoyment and if they conserve and enhance the open nature, character and biodiversity interest of MOL.

21.14 A review of all the land designated as Green Belt, MOL, LGS and OOLTI was carried out, providing an up to date, objective and evidence-based assessment of how the currently protected areas contribute to the purposes / criteria set out in the relevant national/regional or local policy guidance. The Open Land Review (Green Belt, MOL, LGS and OOLTI) (2021, and Errata 2023) found that the Green Belt in the borough scored well against the criteria for its designation in the NPPF; therefore, no change is proposed to Green Belt boundaries. The Review demonstrated that eleven MOL sites did not score as highly against the London Plan MOL criteria. Out of these eleven sites, three fulfil an important ecological purpose, acting as green corridor and linking green spaces; due to their value to the borough's green infrastructure network, the MOL designation is retained for these sites. The Review also demonstrated that a small number of sites have been deliberately mismanaged to try and reduce their value and purpose of MOL; however, this is not a reason to amend or remove their designation. The Review identified two relatively small linear parcels comprising front gardens to residential properties along Hampton Court Road; these are recommended to be removed from MOL. In addition, the Review has identified that one site, i.e. Carpark for Sainsburys, Uxbridge Road, Hampton, scored weakly against all the criteria for MOL designation; the Council proposes to release this from MOL and allocate for 100% on-site affordable housing (see Site Allocation 5). In accordance with the NPPF and London Plan, any alterations

to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL as set out in the London Plan.

21.15 Where a development proposal affects designated Green Belt or MOL, the applicant is required to submit an assessment that compares the footprint and floorspace of existing structures and buildings with the footprint and floorspace of the proposed development. This will enable the Council to make an informed judgement in relation to the overall impact on, and potential loss of, designated Green Belt or MOL. Any increase in either footprint or floorspace within designated Green Belt or MOL will need to be fully justified by the applicant.

21.16 Development that involves the loss of Green Belt or MOL in return for the creation of new open space elsewhere will not be supported. However, where a comprehensive approach to redevelopment can be taken, such as on major schemes or regeneration proposals that deliver significant wider public benefits, it may be acceptable to re-distribute the designated open land within the site, provided that the new open area is equivalent to or improved in terms of quantum, quality and openness. The applicant will need to demonstrate this as part of the justification that 'very special circumstances' may exist.

21.17 Enhancement to the Green Belt or MOL for example by landscaping, removal or replacement of inappropriate fencing and screening, and reduction of the visual impact of traffic or car parking, as well as opening up views into and out of the Green Belt or MOL will be encouraged. Where possible, opportunities to increase the Green Belt's or MOL's potential for wildlife should be maximised.

21.18 Local Green Space, identified on the Policies Map, is green or open space which has been demonstrated to have special qualities and hold particular significance and value to the local community which it serves. New areas

of Local Green Space can only be designated when a plan is being prepared or reviewed. Udney Park Playing Fields was designated as LGS in 2020. The Open Land Review (Green Belt, MOL, LGS and OOLTI) (2021, and Errata 2023) assessed and identified a number of potential sites for consideration as LGS. Whilst some of the assessed sites may qualify for LGS designation, where there is already an existing MOL designation, there would be little to no additional benefit gained by a LGS designation. The Council has taken forward those sites which have scored strongly overall against the LGS criteria set out in the NPPF, and which do not already benefit from an MOL designation. The sites designated as Local Green Space are as follows:

1. North Sheen Recreation Ground
2. Raleigh Road Recreation Ground
3. Ham Village Green
4. Ham Library Gardens
5. Warren Gardens
6. Pensford Field Kew

21.19 In line with the NPPF, managing development within a Local Green Space should be consistent with policy for Green Belt. Development, which would cause harm to the qualities of the Local Green Space, will be considered inappropriate and will only be acceptable in very special circumstances where benefits can be demonstrated to significantly outweigh the harm.

21.20 The following criteria are taken into account when defining Local Green Space:

1. The site is submitted by the local community;
2. There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;
3. The site is not land allocated for development within the Local Plan;
4. The site is local in character and is not an extensive tract of land.

Policy 36

Other Open Land of Townscape Importance (OOLTI)

- A. Other open areas that are of townscape importance will be protected in open use, and enhanced where possible.
- B. In addition to permitted development rights, it will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria will be taken into account when assessing whether development is appropriate:
 1. It must be linked to the functional use of the Other Open Land of Townscape Importance; or
 2. It can only be a replacement of, or minor extension to, existing built facilities; and
 3. It does not harm the character or openness of the open land.
- C. Improvement and enhancement of the openness or character of other open land and measures to open up views into and out of designated other open land will be encouraged. Where appropriate, the Council will encourage measures to restore its green space quality and character, and deliver appropriate and positive measurable Biodiversity Net Gain enhancements.
- D. When considering developments on sites in proximity to designated other open land, any possible visual impacts on the character and openness of the designated other open land will be taken into account.

Policy 40

Rivers and River Corridors

- A. The natural, historic and built environments of the borough's watercourses will be protected. Development adjacent to the river corridors will be expected to contribute to improvements and enhancements to the river environment, including improved public spaces, access to the borough's rivers, especially the Thames Path, the creation of new habitats, and improvements of flood defences and flood storage.

Thames Policy Area

- B. Development within the Thames Policy Area should respect and take account of the special character of the reach as set out in the Thames Landscape Strategy and Thames Strategy (Kew to Chelsea) and the Council's Conservation Area Statements and Studies.
- C. Developments alongside and adjacent to the River Thames should ensure that they establish a relationship with the river, maximise the benefits of its setting in terms of views and vistas. Buildings fronting the river should incorporate uses that enable local communities and the public to enjoy the riverside, especially at ground level in buildings fronting the river.

Public Access

- D. All development proposals alongside or adjacent to the borough's river corridors should:
1. Retain existing public access to the riverside and alongside the river; and
 2. Enhance existing public access to the riverside where improvements are feasible; or
 3. Provide new public access to the riverside where possible, which should be accessible at all times, and maintain existing points of access to the foreshore subject to health and safety considerations. All major development proposals adjacent to the borough's rivers are expected to provide public access to the riverside.
 4. Provide riparian life-saving equipment where required and necessary; this includes, where relevant, the provision of appropriate drowning prevention measures, such as edge protection and appropriate signage in riverside areas.

River Thames public riverside walk

- E. All development proposals adjoining the River Thames are required to provide a public riverside walk, including for pedestrians and cyclists, which will contribute to the overarching aim of providing a continuous publicly accessible riverside walk. For major developments, applicants will be expected to work with adjoining landowners in case ownership issues would prevent public access.

Riverside uses, including river-dependent and river-related uses

- F. The Council will resist the loss of existing river-dependent and river-related uses that contribute to the special character of the River Thames, 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. This will be achieved by:
1. resisting redevelopment of existing river-dependent or river-related industrial and business uses to non-river related employment uses or residential uses unless it can be demonstrated that no other river-dependent or river-related use is feasible or viable;

2. ensuring development on sites along the river is functionally related to the river and includes river-dependent or river-related uses where possible, including gardens which are designed to integrate and enhance the river, and be sensitive to its ecology;
3. requiring an assessment of the effect of the proposed development on the operation of existing river-dependent uses or riverside gardens on the site and their associated facilities on- and off-site; or requiring an assessment of the potential of the site for river-dependent uses and facilities if there are none existing;
4. ensuring that any proposed residential uses, where appropriate, along the river are compatible with the operation of the established river-related and river-dependent uses;
5. requiring setting back development from river banks and existing flood defences along the River Thames.

21.83 The borough's rivers, their banks and surrounding environments contribute to the special and distinctive character of the borough. The rivers are important components of the wider Green and Blue Infrastructure network and provide valuable habitats for wildlife including recreational opportunities for local communities.

21.84 The River Thames runs for 34 km through the borough and forms part of the Blue Ribbon Network, which is a network of linked waterways of strategic importance for London. This borough is the only one in London that is intersected by the Thames, therefore benefiting from one of the longest river frontages and associated recreational areas, which gives the borough a unique and historic landscape character. The River Thames connects a variety of landscapes and townscapes, including open stretches of woodland, parks and open spaces, wildlife habitats, important heritage assets as well as industrial and urban waterfronts.

21.85 The borough's Blue Ribbon network contains the River Thames, and other important rivers and waterbodies including the River Crane, Duke of Northumberland River, Longford River and Beverley Brook. These are also identified as green grid areas in the Mayor of London's All London Green Grid SPG, highlighting the diversity of the borough's green and blue landscapes and environments.

21.86 The network of linked waterways across the borough and beyond are multifunctional assets. They provide transport and recreation corridors; green infrastructure; a series of diverse and important habitats; a unique backdrop for important heritage assets, including World Heritage Sites, landscapes, views, cultural and community activities; as well as drainage, flood and water management and urban cooling functions. As such, the rivers provide environmental, economic, health and wellbeing benefits for communities and contribute to the special and distinctive character of the borough.

21.87 The Tidal Thames within the London Borough of Richmond is within the Southeast Inshore Marine Plan area. There is an overlap between marine and terrestrial planning. A plan for this area has been prepared by the Marine Management Organisation (MMO) and all authorisation or enforcement decisions must be made in accordance with the Marine Plan for any planning activity below mean high water springs, including sections of a tidal river. Early consultation with the MMO is advised.

21.88 The River Crane is an important river corridor, running for 30 kilometres from Harrow through Twickenham and St Margarets to the Thames at Isleworth, which has benefited from significant environmental improvements. Where appropriate, developments alongside and adjacent to the River Crane should contribute to the overarching aim of creating a metropolitan park that provides a continuous, accessible link between Hounslow Heath and the River Thames,

incorporating river restoration works along the lower Crane, including a long distance footpath, improved access for surrounding communities and an enhanced wildlife / ecological corridor. This applies in particular to the following development sites that are considered to be within the River Crane and the connecting Duke of Northumberland River corridor: Greggs bakery, The Stoop, Twickenham Stadium, the Depot and Mereway Day Centre.

21.89 Setting back built development from the borough's rivers, including riverbanks and existing flood defences will be required in line with Policy 8 'Flood Risk and Sustainable Drainage (Strategic Policy)'. The Council, in conjunction with the Environment Agency, will require a buffer zone of 8 metres on the borough's rivers (including the fluvial Thames and culverted main rivers) and 16 metres for the tidal Thames. This will not only allow for the maintenance and future upgrading of the flood defences, but provide opportunities to enhance biodiversity, create buffer zones that support the green infrastructure network and reduce light spill into the river (also see Policy 43 'Floodlighting and Other External Artificial Lighting'), as well as increase and open up public access alongside and to the river.

21.90 Where barriers to fish movement (such as weirs) are present in a watercourse adjacent to or within a development, the applicant is encouraged to propose a design to include the removal of that barrier, or where not feasible, incorporate measures to allow for the natural movement of fish within the watercourse.

Thames Policy Area

21.91 Development proposals within the Thames Policy Area, where appropriate, should ensure that their use and design establish a positive relationship with the river. Account should be taken of the special and varied characters of the River Thames as set out in detail in the Thames Landscape Strategy (from Hampton to Kew) and the Thames Strategy (from Kew to Chelsea) as well as the Council's Conservation Area Appraisals.

21.92 Developments alongside and adjacent to the River Thames should:

- protect, and where appropriate enhance, the individuality and character of the reach;
- establish a relationship with the river and address the river as a frontage;
- open up views and vistas to allow the public to appreciate the riverside setting;
- protect and, where opportunities arise, enhance existing access points, including river-dependent structures such as bridges, jetties, piers and slipways;
- allow for public access for pedestrians and cyclists, and where appropriate boats, to enable local communities to gain access to the river and enjoy the riverside;
- ensure appropriate land uses enable the public to enjoy the riverside setting, especially at ground level in buildings fronting the river where possible.

Public access

21.93 There is public access to much of the riverbank in the borough either by towpath or riverside open spaces. New developments adjacent to and alongside the borough's rivers should provide public access to the river, riverside and the foreshore where feasible and appropriate. The Council will require new developments adjacent to the river to consider the need to provide appropriate drowning prevention measures, such as edge protection, appropriate signage and CCTV. Existing public access to the borough's rivers should be retained and opportunities should be taken to improve and enhance access arrangements, including creating inclusive access, where possible. The Council will also explore opportunities to improve accessibility between different areas of the borough that are separated by the borough's rivers, such as between Ham and Twickenham (see the Place-based strategy for Ham, Petersham & Richmond Park as well as for Twickenham, Strawberry Hill and St Margarets, which refer to the initial feasibility for a new pedestrian and cycle bridge).

21.94 There are parts of the borough where public access to the rivers, including the River Thames, is limited, such as from Kingston Bridge to Twickenham. There is a

long-standing strategy and aim to provide a continuous public riverside walk along both sides of the River Thames. The Council has secured the opportunity to provide considerable sections of public riverside walk by requiring a public path to be provided wherever a development adjoins the River Thames. Therefore, all developments adjacent to the River Thames are required to contribute to the public riverside walk along the River Thames, even if there is currently no public access to the route on either side of the development site. The Council expects developers, particularly on major development sites, to work with adjoining landowners where land ownership issues may prevent the aim of achieving public access; this is to ensure the river and the riverside can be enjoyed by the wider public and local community.

21.95 The river corridors, including their associated parks and open spaces, provide important opportunities for recreation and healthy lifestyles. Therefore, all major development proposals adjacent to the borough's rivers should provide through-site links to the riverside to enable the public access to the riverside environment.

21.96 The Council will support initiatives to de-culvert rivers where it is feasible and practicable to do so, in line with the Council's Surface Water Management Plan.

21.97 Public access to, and alongside, the rivers, for pedestrians, cyclists and boats where appropriate, will be secured through Planning Obligations.

Riverside uses, including river-dependent and river-related uses

21.98 River-dependent uses are those whose primary purpose is dependent on the river for siting and function. They are defined as an activity which can only be conducted on, in, over or adjacent to the river because the activity requires direct access to the river and which involves, as an integral part of the activity, the use of the water. River-dependent structures which may in exceptional circumstances be permitted to encroach into the river and its foreshore include tunnels, bridges, jetties, piers, and slipways.

21.99 River-dependent facilities, such as boatyards and sheds, public and private wharves, slipways, wet and dry docks and cranes, as well as piers, pontoons, jetties and stairs are essential for the survival of the river related industry and to support the continued active use of the river. Therefore, they will be protected so that they are not lost to other uses. The Council supports in principle the safeguarding of the sites identified in The Mayor's Assessment of Boatyard Facilities on the River Thames (2007) and the network of Safeguarded Wharves.

21.100 River-related industrial and business uses, especially those supporting river-dependent uses involving the construction, repair, sale and servicing of river craft, make a vital contribution to the continuation of the historic tradition and function of the River Thames for transportation, communication and recreation and they also play a role in the local economy. This also includes uses and structures that support water-based passenger, tourism and freight transport as well as water-based sport and leisure activities, including visitor and pleasure craft moorings. There should be a move to reducing carbon emissions and the environmental impact, for example away from diesel engines. River-related uses may also include a garden or park specifically designed to enhance public appreciation and public access to the river.

21.101 The Council will therefore protect the existing river-related industrial and business uses and ensure they are not lost to other uses. In addition to their functional roles, river-related uses make an irreplaceable contribution to the character and contrasts of the individual reaches through the activity, distinctive building forms, varied visual interest and historical link they provide. The redevelopment of existing river-related industrial and business sites to residential and non river-related business uses will not be permitted unless it can be demonstrated that such uses are not viable or feasible. This must include evidence of completion of a full and proper marketing exercise of the site at realistic prices both for river-dependent and

river-related uses over a minimum period of two continuous years in accordance with the

approach set out in Appendix 2.

Policy 41

Moorings and Floating Structures

- A. There is a presumption against new proposals for houseboats, including extensions to existing houseboats, and other moorings or floating structures designed for permanent residential use.
- B. Applications for replacement houseboats should demonstrate they would not be materially larger than existing nor harm the character of the river.
- C. A new mooring or other floating structure or development of an existing mooring will be supported if it complies with the following criteria:
 - 1. it does not harm the character, openness and views of the river, by virtue of its design and height;
 - 2. protects and/or enhances the biodiversity of the river;
 - 3. the proposed use is river-dependent or river-related;
 - 4. there is no interference with the recreational use of the river, riverside and navigation; and
 - 5. the proposal is of wider benefit to the community.

21.102 The River Thames is designated Metropolitan Open Land and therefore the character and openness of the river will be safeguarded from inappropriate uses. Whilst it is acknowledged that existing houseboats, moorings and other floating structures are an established part of the river scene, houseboats, by definition, are an inappropriate use within Metropolitan Open Land. They can cause problems because of infrastructure provision (such as sewage, waste, water, secure storage and washing), provision of access, servicing and car parking, obstruction to navigation and public access to the river, interference with the recreational use of the river and its foreshores and impacts on the views, local character and amenity of the river. Therefore, new proposals for houseboats, including extensions to existing houseboats and other moorings or floating structures designed for permanent residential uses will be resisted.

21.103 Whilst the Council has limited powers regarding the appearance of boats not subject to planning controls, planning permission is

required for new moorings and change of use of the river bank and river bed for permanent mooring. Permanently moored vessels and development into waterways should only be permitted for water-related uses. The River Thames should not be used as an extension of developable land in London, nor should parts be a continuous line of moored craft. Proposals for development into waterways will protect at a minimum, and where appropriate enhance, the biodiversity of the river.

21.104 It should be noted that the Council introduced a Moorings Bylaw in 2015. As such, a criminal offence will be committed if any vessel is moored for longer than permitted without the written consent of the Council. The Environment Agency and the Port of London Authority require houseboats to be licensed and can object to them on navigational grounds. The Environment Agency is also able to object to houseboats on flood risk and biodiversity grounds.

Policy 46

Amenity and Living Conditions

- A. All development will be required to protect the amenity and living conditions for occupants of new, existing, adjoining and neighbouring properties and the visual amenity of the area as a whole. The Council will support development where it:
1. Ensures the design and layout of buildings does not have an unacceptable impact on levels of daylight and sunlight on the host building or neighbouring properties, including gardens and outdoor spaces; where existing daylight and sunlight conditions are already substandard, they should be improved where possible;
 2. Ensures that adequate outlooks are provided for new occupants, and that heights, massing and siting of new development retains adequate outlooks for neighbouring occupants, avoiding any undue sense of enclosure;
 3. Ensures that acceptable standards of privacy are provided and retained, without a diminution of the design quality; development should not result in unacceptable levels of overlooking (or perceived overlooking); balconies should not cause unacceptable overlooking or noise or disturbance to nearby occupiers;
 4. Ensures that proposals are not visually intrusive or have an overbearing impact as a result of their height, massing or siting; visual amenity from adjoining sites and from the public realm should not be unacceptably compromised;
 5. Ensures there is no harm to the reasonable enjoyment of the use of buildings, gardens and other spaces due to increases in traffic, servicing, parking, noise, light, disturbance, air pollution, odours or vibration or local micro-climate effects;
 6. Provides adequate outdoor amenity space for new occupiers in accordance with Policy 13 'Housing Mix and Standards ', which is free from excessive noise or disturbance, pollution, odour, sense of enclosure, unacceptable loss of privacy, wind and overshadowing.
- B. Applicants are expected to have regard to the guidance set out within the Council's SPDs relating to design, including Village Planning Guidance, House Extensions and External Alterations, and Small and Medium Housing Sites, as well as other Local Plan policies on infill and backland developments and housing mix and standards.
- C. Development will be expected to address London Plan Policy D13 on the Agent of Change principle, and accord with Policy 53 'Local Environmental Impacts'.

22.33 This policy covers all development, including extensions, alterations and changes of use. The aim is to protect the living conditions and amenity of occupants of new, existing, adjoining and neighbouring buildings as far as possible from unreasonable impacts of new development.

22.34 The Council will support proposals for development that protect the amenity of both its future occupiers and the occupiers of adjoining and neighbouring properties. The term 'property' encompasses both the building as well as its curtilage, including gardens.

22.35 New buildings and extensions need to take careful account of the amenity and living conditions of neighbours, with particular regard to natural light, light pollution, privacy, noise and disturbance. Adverse impacts on neighbouring properties and their occupiers, including on the most well-used part of residential gardens, can include loss of light (including to solar panels), loss of outlook, sense of enclosure, overlooking and loss of privacy (both actual and perceived), alterations to micro-climates and pollution from noise or light. Impacts could be from the new development itself or from associated

development and uses such as ancillary buildings, parking areas, access ways, gardens, communal open space and hard and soft landscaping.

- 22.36** Particular attention needs to be paid to these matters in order to address public concerns in relation to amenity and living conditions impacts. However, regard must also be had, as part of the assessment of a planning application, to the Council's duty to maintain, and where appropriate, enhance the character, appearance and distinctiveness of the borough, particularly of Conservation Areas. It is the overall design, taking all factors into account including the area's character, that will be the determinant of whether a proposal has a reasonable impact on amenity and living conditions.

Daylight, sunlight and solar glare

- 22.37** In assessing whether sunlight and daylight conditions are acceptable, the Council will have regard to the most recent Building Research Establishment (BRE) guidance, taking into account context and other material considerations. Assessment will apply for new development, and for properties affected by new development, to include inside buildings, gardens and open spaces.
- 22.38** Solar glare principally occurs when the sun is low in the sky and dazzles the eye either directly or indirectly via a reflected surface. Glare or dazzle can occur when sunlight is reflected from a glazed façade or area of metal cladding. This can affect road users, such as pedestrians, cyclists and drivers, and the occupants of adjoining buildings. The potential impact of glare or dazzle will need to be carefully considered and assessed where relevant to ensure there are no adverse impacts.

Visual intrusion, privacy and outlook

- 22.39** An overbearing, overpowering or over-dominant development can significantly reduce the quality of living conditions both inside and outside, in new as well as existing developments. The degree of overlooking depends on the distance and the horizontal

and vertical angles of view. The impact on the sense of enclosure will often be dependent on an on-site judgement.

- 22.40** The policy seeks to strike a balance between how developments are designed to enable a sense of community as well as offering people enough privacy in their homes. Whilst there will be some impact from any new development, the test is degree of harm in relation to the impact on habitable rooms, which includes all separate living rooms and bedrooms, plus kitchens with a floor area of 13sqm or more. Development should have regard to the Mayor's Housing Design Standards London Plan Guidance (consultation draft February 2022), which provides guidance on aspect, orientation, daylight and sunlight, including that the main living and eating spaces enjoy reasonable privacy.
- 22.41** For developments in Richmond, a minimum distance guideline of 20 metres between habitable rooms within existing residential development is usually viewed as appropriate for privacy reasons; a greater distance may be required for other reasons, or a lesser distance may be acceptable in some circumstances. These numerical guidelines should be assessed on a case by case basis, since privacy is only one of many factors in site layout design; the established pattern of development in the area (layout and height) may justify lesser distances. The distance of 20 metres is generally accepted as the distance that will not result in unreasonable overlooking. Where principal windows face a wall that contains no windows or those that are occluded (e.g. bathrooms), separation distances can be reduced to 13.5 metres.
- 22.42** So as not to unnecessarily restrict density on certain sites, when designing buildings with regards to its impact on other buildings within the same development, additional measures can be applied to minimise overlooking, such as splays, angles of buildings, obscure glazing etc. The internal layout of buildings can also be coordinated so that residual overlooking is only between rooms of the same type and sensitivity (i.e. living rooms facing living rooms, and bedrooms facing

bedrooms). A Supporting Planning Statement should set out justification for reduced distances.

- 22.43** Privacy of gardens and courtyards is also important. However, public spaces and communal amenity areas will benefit from a degree of overlooking due to the increased level of surveillance it can provide.
- 22.44** Balconies or terraces on roofs of main buildings can be visually intrusive and result in serious intrusion into the privacy and quiet enjoyment of neighbouring residential properties.
- 22.45** Outlook is the visual amenity enjoyed by occupants when looking out of their windows or from their garden; how pleasant an outlook is depends on what is being viewed. Loss of daylight/sunlight (based on BRE guidance), overshadowing and loss of outlook to the detriment of residential amenity are material planning considerations; however, the loss of a private view from a property is not a material planning consideration.
- 22.46** The Council's SPDs, including on Householder Extensions and External Alterations, Residential Development

Standards, Small and Medium Housing Sites (and any future updates to these SPDs) and the Urban Design Study, provide further guidance and illustrations on how to assess sunlight/daylight, overshadowing, visual intrusion, privacy and space between buildings.

Noise and plant equipment

- 22.47** Development should be designed to reduce the impact of noise to an acceptable level through the use of attenuation, distance, screening and layout/orientation, having regard to London Plan Policy D14 'Noise' and Policy 53. Local Environmental impacts.
- 22.48** Service equipment (including lift plant, air handling/extract, boiler flues, meter boxes, gas pipes and fire escapes) should be fully integrated into the building envelope or located in visually inconspicuous locations within effective and robust screening/enclosures, and should not cause disturbance through its operation.

23 Reducing the need to travel and improving the choices for more sustainable travel



Policy 47

Sustainable Travel Choices (Strategic Policy)

- A. The Council will work with others to bring about safe, sustainable, accessible transport solutions to reduce the proportion of trips taken by private car, reduce traffic congestion, reduce air pollution, including carbon dioxide emissions, improve public health, and improve access to services and employment in accordance with the policies set out in the London Plan, Mayor's Transport Strategy, and the Council's own Active Travel Strategy. Planning applicants will therefore be expected to:

Location of development

B. Propose major developments (see Table 23.1 for a definition) in areas that either already have a Public Transport Accessibility Level of 4-6 or if not mitigate the impact of their development on the existing passenger transport network in accordance with Para. 110d of the National Planning Policy Framework (NPPF). Depending on the impact of the development relative to the capacity of the bus and rail network in its final assessment year, this may include applicants making financial contributions to increase capacity and/or improve infrastructure on the passenger transport network.

Active travel

C. Ensure that their proposed developments provide a high-quality walking and cycling environment both within the curtilage of the development and in its near vicinity so that occupants can make short journeys to local town centres, services, and work, by sustainable modes of travel and can benefit from high quality, safe access to public transport services. This may include paying for and completing off-site works on the adopted highway under S278 of the Highways Act 1980 to mitigate the impact of their development. All proposed pedestrian and cycle improvement works must have regard to the National Design Guide, the London Cycling Design Standards, Local Transport Note 1/20: Cycle Infrastructure Design, and Manual for Streets. All off-site highway works must meet technical standards set out by the Council's Traffic and Engineering team.

Inclusive mobility

D. Ensure that their development proposals provide safe and suitable access to and around their developments for disabled and other vulnerable road users in accordance with guidance set out in Manual for Streets and Inclusive Mobility: making transport accessible for passengers and pedestrians (Department for Transport, 2022).

Assessing the impact of developments

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 NPPF.

F. All planning applications for major developments will need to include a full transport assessment and travel plan which must be completed in accordance with Transport for London (TfL) guidance. Applications for smaller developments must include a transport statement and travel plan statement, also completed in accordance with TfL guidance (see Table 23.1). Applications under a certain size will be expected to include a chapter about transport and accessibility in their Design and Access Statement.

River transport

G. Where appropriate, enable the River Thames to be used for passenger and freight transport as well as servicing and construction of their development proposals, through the provision, improvement, or retaining of relevant infrastructure including wharves, slipways, and piers.

Safeguarding routes and facilities

H. Where appropriate, ensure that their development proposals safeguard land required for transport schemes and infrastructure set out in the London Plan and/or the Council's Local Implementation Plan.

Taxis, coaches and private hire vehicles

I. Where appropriate, ensure that taxis, minibuses, coaches, and private hire vehicles can safely pick up and drop off their passengers. Where they have to use the highway to do this, applicants will need to pay the Council to implement Traffic Management Orders under the Road Traffic Regulation Act 1984 and/or may need to complete other highway works. Applicants should only propose using the existing highway for this when no on-site provision is possible.

Table 23.1 Transport Impact Assessment Thresholds

Land Use Class (GIA)	Cover as part of design and access statement	Transport statement and travel plan statement	Transport assessment and full travel plan statement
Food retail (E(a))	Under 250m ²	250m ² – 800m ²	800m ² or over
Non-food retail (E(a))	Under 800m ²	800m ² -1,500m ²	1,500m ² or over
Financial and professional services (E(c i-iii))	1,000m ²	1,000m ² -2,500m ²	2,500m ² or over
Restaurants and cafes (E(b))	Under 300m ²	300m ² – 600m ²	600m ² or over
Drinking establishments (Sui Generis)	Under 300m ²	300m ² – 600m ²	600m ² or over
Hot food takeaway (Sui Generis)	Under 250m ²	250m ² – 500m ²	500m ² or over
Business (E (g i-iii))	Under 1,500m ²	1,500m ² – 2,500m ²	2,500m ² or over
General industrial (B2)	Under 2,500m ²	2,500m ² – 4,000m ²	4,000m ² or over
Storage and distribution (B8)	Under 3,000m ²	3,000m ² – 5,000m ²	5,000m ² or over
Hotels (C1)	Under 30 beds	30 – 50 beds	50 beds or over
Residential institutions (Hospitals and Nursing Homes) (C2)	Under 30 bedrooms	30-50 bedrooms	50 bedrooms or over
Residential institutions (Residential education) (C2)	Under 50 students	50-150 students	150 students or over
Residential Institutions (Institutional Hostels) (C2)	Under 250 residents	250 – 400 residents	400 residents or more
Dwelling houses (C3)	Under 10 dwellings	10-80 dwellings	80 dwellings or more
Non-residential institutions including higher and further education (F1)	Under 500m ²	500m ² – 1,500m ²	1,500m ² or above

Land Use Class (GIA)	Cover as part of design and access statement	Transport statement and travel plan statement	Transport assessment and full travel plan statement
Primary and secondary education (F1)	Seek pre-app advice	Seek pre-app advice	Seek pre-app advice
Assembly and leisure (F1/F2)	Under 500m ²	500-1,500m ²	1,500m ² or above
Sui Generis	Seek pre-app advice	Seek pre-app advice	Seek pre-app advice
Other uses falling within Class E	Seek pre-app advice	Seek pre-app advice	Seek pre-app advice

23.1 The borough is committed to promoting sustainable travel, decreasing car use and improving air quality. Ensuring that walking, cycling and public transport are the natural choice for trips to and from new developments is vital if these goals are to be achieved. The policies on Sustainable Travel Choices and Parking in the Local Plan should be read alongside those in the London Plan and the Mayor of London's Transport Strategy.

23.2 The Council has a Local Implementation Plan (LIP 3) adopted in 2019 detailing its vision for how the transport network will be transformed over the next 20 years. It includes a headline target for 75% of trips to be by sustainable modes (walking, cycling and public transport) by 2041, from a baseline of 61%. The plan also includes targets for expanding the cycle network, improving air quality, reducing road danger and increasing the use of public transport. Planning applicants proposing major developments will need to demonstrate how their proposals help meet these targets.

23.3 The Richmond Active Travel Strategy 2020 has been developed to provide detail on how the Council will support the objectives in the Local Implementation Plan, focusing on walking and cycling. The Local Plan policies seek to prioritise facilities for sustainable travel modes and promotes a Healthy Streets Approach in developments, as set out in Policy 1 'Living Locally and the 20-minute neighbourhood (Strategic Policy)' and in accordance with the London Plan policy T2.

Location of development

23.4 Developments that will generate a large volume of trips should be focused in areas with high Public Transport Accessibility Levels (PTALs) to help create the most sustainable transport environment. PTAL takes account of the accessibility of a location to public transport, in six broad bands, with level 6 being the most accessible. Whilst in general higher PTALs are achieved in areas with good rail/tube connections, in this borough it is recognised that bus links also contribute to levels of accessibility to public transport. Future improvements to accessibility will also be relevant. These include planned changes by Transport for London (TfL), the Council, rail or bus companies or improvements which could be either provided as part of a new development or funded by developer contributions. To be taken into account there will need to be certainty that future improvements will be implemented in time to serve the development and would be sustainable in the longer-term.

23.5 High trip generating development includes larger offices, shopping and leisure facilities as well as mixed use and higher density residential schemes, where a large number of trips are generated each day. As a starting point, areas with a PTAL score of 4-6 are considered to be appropriate locations for high trip generating development.

23.6 The Council will use a site's current PTAL as a starting point, but also consider the highway capacity, the proximity of cycle and walking routes as well as future improvements when evaluating development proposals.

Active travel

- 23.7** The Healthy Streets Approach underpins the Mayor's Transport Strategy and seeks to encourage more Londoners to use active travel by improving the quality and experience of being on our streets. The approach puts people, and their health, at the heart of decision-making, resulting in a healthier and more inclusive city where people choose to walk, cycle and use public transport. Policies and strategies are expected to focus on creating streets that are pleasant, safe and attractive, where noise, air pollution, accessibility and lack of seating and shelter are not barriers to prevent people – particularly the most vulnerable people – from getting out and about. These objectives are interlinked with this Local Plan's priorities around living locally and minimising greenhouse gas emissions.
- 23.8** The Council's Active Travel Strategy aims to increase the number of trips in the borough taken by walking and cycling, as both standalone trips and as part of longer trips involving public transport. Objectives include: to support local walking and cycling trips using the Healthy Streets Approach; create a high-quality core cycle network connecting popular destinations; make improvements to clean-air walking and cycling routes away from roads; and improve awareness of local walking, cycling and running routes.
- 23.9** Developments should encourage the use of modes other than the car by making it as easy as possible through provision of good pedestrian facilities, clear layout and signage, provision of cycling facilities and improving access to public transport interchanges. Civic spaces and public realm should be accessible and inclusive. A good walking environment has been shown to be not only beneficial to an individual's health and social life, but also to bring economic benefits to the borough's centres.
- 23.10** Cycling and walking contributes significantly towards creating an attractive and pleasant environment. New development should include all the facilities needed to encourage a safe walking and cycling environment from first occupation. Cycle parking should, at least, be provided in accordance with the minimum standards in the London Plan.
- 23.11** Developments should be integrated into the surrounding community and existing local routes and provide for improvements to accessibility for all. There are many footpaths, Public Rights of Way and cycle routes in the borough that new development should not compromise, and opportunities to improve them should be taken wherever possible. For this reason, in line with Policy 28 'Local Character and Design Quality (Strategic Policy)', gated developments will not be permitted.
- 23.12** The Council promotes the creation of a safe network for pedestrians and cyclists. Management of other users including speed restrictions, sufficient widths, segregation where appropriate, introducing traffic calming measures where needed, and well designed and positioned crossing facilities can reduce conflict between users. Well-designed paths, natural surveillance, appropriate levels of lighting and other security measures and good levels of maintenance can improve actual and perceived security. The Council's Public Space Design Guide includes advice with respect to the amenity of the pedestrian environment. The London Cycling Design Standards sets out requirements and advice for cycle network planning and for the design of dedicated cycle infrastructure, cycle-friendly streets and cycle parking
- 23.13** The Council will ensure that there is signage and way marking of the three strategic walking routes identified in the London Plan, and of the main cycle routes (see The Council's Active Travel Strategy), which run through the borough – the Thames Path National Trail, the Capital Ring and the London Loop, and other promoted route, such as the River Crane Walk and Beverley Brook Walk, which together form a network of leisure routes which most residents can reach
- 23.14** Proposals that improve transport links within or between the borough and other areas will be encouraged. This could refer to physical proposals and improvements such as a new bridge or path; improving existing links such as creating a new gate into a park; or

increasing the use of an existing link such as the promotion of a route as a travel option. Reference should be made to the priorities identified in the Local Implementation Plan.

Inclusive mobility

23.15 New development must be accessible and inclusive for a range of users, including disabled people and people with long-term health conditions, by adopting an inclusive design approach. This includes the approach to parking, a wholistic approach to streets, and wider way-finding and legibility. For technical guidance on this subject, applicants are advised to use the latest guidance on Inclusive Mobility. Applicants should also seek advice from Borough Engineers on this subject if they intend to carry out new works on the highway.

Assessing the impact of developments

23.16 All planning applications will be required to demonstrate that their proposed developments do not have a severe impact on the operation, safety, or accessibility of the local or strategic road network. The method of assessment required will depend on the use(s) being proposed and its size, in accordance with the thresholds in Table 23.1. The assessment requirements for some uses now falling within Class E of the Use Classes Order will need to be considered on a case-by-case basis if the particular Class E use is not specified in Table 23.1 ('Other uses falling in Class E'). Where necessary and justified, the Council will use conditions and/or planning obligations to limit uses consented within Class E in order to achieve the objectives of this policy and in line with the NPPF and accompanying PPG to assess the significant impacts from the development on the transport network or on highway safety, and to mitigate the impacts of development given the range of uses that need to be fully assessed. Matters to be included in Transport Assessments and Transport Statements are set out in the London Plan, the latest Department for Transport as well as Transport for London guidance, and the Council's Local Validation Checklist and Transport SPD.

23.17 Planning applicants are strongly advised to seek pre-application planning advice regarding the parameters of any assessment of the transport impacts of their development proposals. For major development proposals, they are also advised to seek pre-application transport advice from Transport for London (TfL) Officers as well as Borough Officers.

23.18 In instances where the applicant is required to assess the transport impacts of their development as part of their design and access statement (see Table 23.1 above) they will need to include:

1. A description of the development proposals
2. A description of the local highway and passenger transport network
3. Trip generation details, using TRICS for residential developments of 10 dwellings or more, or for other land uses that are at or above the threshold at which a transport statement and travel plan statement is required (see Table 23.1).
4. A vehicular parking stress survey if the required off-street vehicular parking standard cannot be met (see Policy 48 'Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management')
5. Details of how the proposed development will be serviced
6. Details of off-street car and cycle parking (see Policy 48 'Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management')
7. Details of how any significant impacts will be mitigated, including on-street vehicular parking.

23.19 Developments will be expected to continue travel planning after occupation to maximise travel by sustainable transport, including personalised travel planning. Existing schools and large employers will also be encouraged to produce travel plans for their sites to help encourage sustainable travel.

River transport

23.20 The Council encourages the use of the River Thames for passenger and freight transport through the protection of, and improvement

to, the relevant infrastructure including wharves and slipways. By reducing demand for other forms of surface transport, particularly on roads, the benefits of low carbon emissions water transport link through to other key aspects of this Plan, such as reducing traffic and congestion, improving the local environment and quality of life. Together with other policies in this Plan, including Policy 34 'Green and Blue Infrastructure (Strategic Policy) ', Policy 40 'Rivers and River Corridors 'and Policy 41 'Moorings and Floating Structures', this policy supports the multi-functional use of the Blue Ribbon Network.

Safeguarding routes and facilities

23.21 The need to ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system is identified in the London Plan. The Council will ensure that development proposals safeguard land required for transport schemes and infrastructure unless alternative facilities are satisfactorily provided. The loss of existing bus garages will be resisted, to safeguard capacity for efficient and sustainable operation of the network, unless it is demonstrated, and confirmed by Transport for London, that it is operationally no longer needed or enhanced reprovision has been made as part of the redevelopment of the site or elsewhere in a convenient and accessible alternative location.

23.22 To discourage vehicles having to make longer trips in order to reach refuelling stations, the Council is seeking to protect existing facilities. Any new facilities should be located on strategic or distributor road networks to minimise disruption and to protect residential amenity. The provision of refuelling facilities for alternative types of fuel e.g. electric or hydrogen will also be encouraged

23.23 The need for improved quality and connectivity of transport interchanges to improve movement in Outer London was identified in both the London Plan and by the Outer London Commission. In the local context 'transport interchanges' refers to anywhere where more than one type of transport mode meets, from train and bus stations to bus stops. Transport schemes are set out in the Council's Local Implementation Plan and where appropriate in the site allocations of the Local Plan, and/or in planning briefs.

23.24 Delivery of transport infrastructure, including the relevant proposed transport schemes as set out in the London Plan, is critical to the delivery of the strategic objectives of the Local Plan. Planning, through the use of developers' contributions such as through the use of planning obligations (including Section 106 and Community Infrastructure Levy) is a key way that the Council can gain the necessary resources to assist in the delivery of this vital infrastructure.

Taxis and private hire vehicles

23.25 Taxi ranks should be conveniently located close to the venue they serve and accessible for all with adequate space for customers to queue. Taxi ranks should be well-lit and with good CCTV facilities. Ranks must not adversely impact on pedestrian movement or road safety. The Council will consider applications for offices for private hire vehicles against relevant policies of the plan, and subject to them not having an adverse impact on other types of transport including walking and cycling, on-street parking and highway safety or causing disturbance to residents. Transport for London's Taxi and Private Hire Guidance for Developers (2018) should be referred to when planning for taxi provision.

Policy 48

Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management

- A. The Council will require new developments to make provision for the accommodation of vehicles to provide for the needs of the development while minimising the impact of car-based travel including on the operation of the road network and local environment and ensuring making the best use of land.

Vehicular and Cycle Parking Standards

B. Planning applicants will therefore be expected to provide off-street vehicular and cycle parking, including electric vehicle charging points, in accordance with standards set out in Policies T5 and T6.1 – T6.5 and Tables 10.2 – 10.6 of the London Plan. Electric vehicle charging points must be provided in a way that ensures the development is safe for other road users.

C. Planning applicants need to have regard to the London Cycle Design Standards when proposing off-street cycle parking for their developments, to deliver cycle parking that is fit for purpose, secure and well-located (preferably close to the pedestrian entrance of the main building), and easy to use by people of all ages.

Applications for Dropped Kerb and Crossover Accesses to allow Front Garden/Yard Parking

D. Front yard/garden perpendicular parking reduces the quality and safety of Richmond's footways for pedestrians and road users with disabilities and reduce on-street vehicular parking capacity. 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).

Car-Free Developments

F. Car-free developments may be appropriate where:

1. The public transport accessibility level (PTAL) is 3 or above
2. Off-street disabled vehicular parking can be provided in accordance with standards set out as per part A above.
3. Cycle parking can, at least, be provided in accordance with the minimum standards set out in the London Plan and designed in accordance with the London Cycle Design Standards.
4. The development is in a controlled parking zone and the applicant is prepared to enter into a legal agreement which excludes all occupants from vehicular parking permits within this, including season tickets in Council-managed car parks.
5. In cases where there is no CPZ that occupants can legitimately be excluded from or that operates for only a small number of hours per day, the applicant can demonstrate, through a parking stress survey, that their development will not increase on-street vehicular parking stress above 85% of total on-street vehicular parking capacity. In certain cases, where a development is forecast significant impact on on-street parking stress in an area, mitigation may be sought in the form of financial contributions towards the cost of reviewing and changing an existing CPZ or implementing a new one.
6. Household and commercial refuse and recycling collectors can service the development safely in accordance with the Council's Refuse and Recycling Storage Requirements Supplementary Planning Document (2022).
7. It can be demonstrated that other commercial and emergency service vehicles can service the development in accordance with standards set out in Manual for Streets (see part L of this policy).

8. The applicant is prepared to consider other forms of mitigation such as the provision of free membership of a local car club for occupants, or, in instances of major developments, can provide one or more car club spaces on the site.

The Provision of Vehicular and/or Cycle Parking Infrastructure on the Highway

G. The Council will not encourage the provision of disabled vehicular parking space on the highway to enable planning applicants to meet the standards for disabled vehicular parking set out above.

H. Planning applicants will be expected to provide all long and short stay cycle parking off-street. If this is not possible, they will need to contribute to the cost to the Council of installing bike hangars or other cycle stands, including TMOs or other highway works needed to facilitate this.

Car Club Bay and Membership Provision

I. Applicants proposing developments of 100 dwellings or above will be expected to provide one off-street car club space per 100 dwellings, and 1 space per 200 dwellings thereafter, and to secure an accredited car club operator to operate the car club from the spaces provided, subject to the operator considering it commercially viable, and will also be expected to fund the cost of membership of the car club scheme to which the car belongs to all the first occupants of the site for a minimum of three years.

J. Where applicants propose developments with fewer than 100 dwellings, planning applicants will be expected to fund the cost membership of a nearby car club scheme to all the first occupants of the site for a minimum of three years. This will be secured through an S106 legal agreement.

Freight and Servicing

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 NPPF.

L. All developments will need to demonstrate that refuse, recycling, commercial, and emergency service vehicles can service their development safely in accordance with guidance set out in Manual for Streets, Transport for London (TfL)'s guidance on delivery and servicing plans, and the Borough's Supplementary Planning Document Richmond Refuse and Recycling Storage Requirements. They will need to do this through a delivery and servicing management plan.

Construction Traffic/Logistics Management

M. Planning applicants proposing major developments will be expected to submit a Construction Logistics Plan (Construction Management Plan) with any planning application. This will need to be completed in accordance with TfL guidance and the Council's guidance.

N. Planning applications proposing developments that are below the size at which a transport statement and travel plan statement are needed (see Table 23.1 within Policy 47 'Sustainable Travel Choices (Strategic Policy)') will be dealt with on a case-by-case basis and may be asked to provide a Construction Logistics Plan. Where works may involve significant impact to the highway, neighbours, or the wider highway network, a Construction Logistics Plan (Construction Management Plan) will be required.

23.26 The borough has high levels of car ownership and use within fairly densely developed residential areas with some narrow streets and many older houses without off-street parking. This has led to high levels of on-street parking, worsened in areas where there is a demand for commuter parking. The approach aims to ensure that sufficient on-site car parking is provided to meet the needs of the occupiers of the new development, but also to ensure that excessive on-street parking demand is not created which could have an adverse impact on local highway/traffic conditions, street scene and impacts on making the best use of land.

Vehicle and cycle parking standards

23.27 This policy covers the parking standards for new developments of all types. Parking must be sensitively located and designed and suitably landscaped to minimise visual intrusion and disturbance. To maintain sufficient parking space within new developments, the parking provision will be expected to be legally tied to the development that it serves.

23.28 To mitigate the impact of their proposed development on the level of on-street vehicular parking stress in their local area, planning applicants proposing developments located in an area covered by a controlled parking zone (CPZ), or proposing developments in areas that might be covered by a CPZ in the future pending a review of the area and a statutory consultation process carried out by the Council's Parking Policy team, may be asked to enter into an S106 legal agreement which will preclude all occupants, with the exception of those holding blue badges for disabled motorists, of that development from purchasing vehicular parking permits within any controlled parking zone (CPZ) or any Council-managed carpark within the Borough of Richmond-Upon-Thames. This will depend on:

1. The size of their development (see Table 23.1 within Policy 47 'Sustainable Travel Choices (Strategic Policy)')

2. The number of off-street vehicular parking spaces proposed, including disabled parking spaces
3. The proposed land uses
4. The level of in or out-commuting by car in the local area
5. The level of household car ownership within the local area
6. The level of on-street vehicular parking stress in that area (see below)
7. The level of existing take-up of CPZ permits within the particular CPZ

23.29 Such restriction would be secured by excluding the address from the schedule of streets in the relevant road traffic order that created or creates the Controlled Parking Zone in which the property is situated, by restricting under section 106 of the Town and Country Planning Act 1990 the disposal of an interest in relevant properties unless a person disposing advises the person acquiring of the non-availability of residents or business on-street parking permits and/or through Section 16 of the Greater London Council (General Powers) Act 1974 (or any statute revoking or re-enacting that Act).

23.30 Depending on the above factors, applicants may be asked to submit an on-street vehicular parking stress survey, completed in accordance with the Council's guidance. Applicants are strongly advised to seek pre-application transport advice regarding the likelihood of occupants of their development being excluded from any CPZ or the need for a vehicular parking stress survey before they submit any planning application.

23.31 Commercial occupants of any development will be limited to no more than five controlled parking zone permits per business. Applicants proposing Use Class F or Class E(e) or (f) and/or sui generis land uses will be excluded from the CPZ their proposed development is located within.

Applications for Dropped Kerb and Crossover Accesses to allow Front Garden/Yard Parking

23.32 New dropped kerb and vehicular crossover accesses reduce the quality and safety of the pedestrian environment, particularly for disabled road users, result in higher road maintenance costs for local taxpayers, and

result in the loss of on-street vehicular parking space in a Borough in which household car ownership levels are above the average for London. 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.

- 23.33** The Council will not remove or reposition trees to allow for the implementation of a vehicular crossover or drop kerb. Where a tree has been removed, the location will be reserved for a replacement tree, the Council will not agree to the construction of a vehicular cross over or drop kerb in its place. See Policy 42 'Trees, Woodland and Landscape' which recognises the value of trees in the borough.

Car-free developments

- 23.34** Car-free developments may be acceptable where they meet the criteria in part C of the policy. Developers should contact the Council's transport planners at an early stage to discuss parking requirements (transportation@richmond.gov.uk). Developers may be required to undertake local street parking surveys to demonstrate the capacity of the highway to accommodate additional parking demand. Development, particularly larger development, is commonly excluded from eligibility for existing or future street parking permits. Applicants might also be asked to make a financial contribution towards the review of on-street parking in the area in which their proposed development is located, and/or the design or re-design of a CPZ which will mitigate the impact of their development on on-street parking stress.

The Provision of Vehicular and/or Cycle Parking Infrastructure on the Highway

- 23.35** Disabled parking spaces are expected to be provided off-street within developments. This is because household car ownership levels in the Borough are above the London average and, as a result, on-street vehicular parking space is scarce. Also, these spaces may not be able to be reserved for residents of the development.

- 23.36** Cycle parking facilities on the highway cannot be reserved especially for occupants of for visitors to any development and can be used by any member of the public who wishes to use them. Therefore, all short and long-stay cycle parking is expected to be provided off-street where feasible.

- 23.37** Where it is not possible to provide off-street short and long stay cycle parking in accordance with the standards set out in part A planning applicants will be expected to contribute towards the cost of installing bicycle hangars or Sheffield stands on the highway where there is local support for the Traffic Management Order required to install them. This will be secured through a S106 legal agreement.

Car Club Bay and Membership Provision

- 23.38** The Council encourages the use of car clubs as an alternative to private car ownership. Car clubs can help reduce levels of household car ownership, the number of journeys taken by car, and the need for off and on-street vehicular parking space.
- 23.39** Car club spaces should be provided off-street where possible. If this is not possible, the applicant will be expected to pay for the cost of a Traffic Management Order and, if necessary, S278 highway works, to install any car club bays on the highway.
- 23.40** Car club vehicles should also be available for use by members of the public for the required fee and the operator should be accredited by CoMoUK or otherwise approved by the Council.

Freight and servicing

- 23.41** The majority of the borough's businesses and other organisations require regular servicing and deliveries to their site(s). However, it must be recognised that whilst these vehicles provide a vital service, they can also be a cause of congestion, safety and environmental concerns if not properly managed through a variety of mechanisms. Such premises often neighbour residential properties and a balance needs to be achieved between enabling businesses to receive the goods and services they need

and protecting residential amenity. A range of techniques and facilities can be used as tools in minimising any negative impacts from freight and servicing.

- 23.42** As stated above, planning applicants are strongly advised to seek pre-application transport advice before submitting their planning application(s). Officer advice in response to this can include advice on servicing and refuse/recycling collection. Regarding refuse and recycling storage and collection, applicants must have regard to LBRuT's Refuse and Recycling: Storage and Access Requirements for New Developments Supplementary Planning Document (2022) which can be accessed at: [Refuse and Recycling: Storage and Access Requirements for New Developments Supplementary Planning](#) and regarding the management of deliveries and servicing, need to have regard to Transport for London's Delivery and Servicing Plan Guidance (TfL, 2020) at: [London's Delivery and Servicing Plan Guidance](#)

Construction traffic/logistics management

- 23.43** Construction Logistics Plans are also referred to as Construction Management Plans. Applicants should complete and submit a Construction Management Plan using the Council's latest pro-forma CMP template here: [Construction Management Plan Guidance](#)

- 23.44** Where applications do not require a formal CMP, applicants will be expected to pay for the cost of any works on the highway that will be needed to facilitate safe construction access and egress such as temporary traffic management orders (TTMOs) to close road space, the suspension of on-street vehicular parking bays, the installation of new vehicular crossover accesses, or the reinforcement of existing ones so that they can accommodate construction vehicles safely. The appropriate licences must be applied for prior to commencement.

- 23.45** As stated above, planning applicants are strongly advised to seek pre-application transport advice before submitting their planning application(s). Officer advice in response to this can include advice on construction traffic management.

- 23.46** All basement applications require a CMP. Further guidance is contained in Policy 53 'Local Environmental Impacts'. If the retaining walls of any basement are 3m or less from the highway boundary, all basement proposals will, in addition to requiring planning permission, require an approval in principle from the London Borough of Richmond's Highway Structures Engineer. This is to protect the structural integrity of the highway.

24 Securing new social and community infrastructure to support a growing population



Policy 53

Local Environmental Impacts

- A. The Council will seek to ensure that local environmental impacts of all development proposals do not lead to detrimental effects on the health, safety and the amenity of existing and new users or occupiers of the development site, or the surrounding land. These potential impacts can include, but are not limited to, air pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle as well as land contamination
- B. Developers should follow any guidance provided by the Council on local environmental impacts and pollution as well as on noise generating and noise sensitive development. Where necessary, the Council will set planning conditions to reduce local environmental impacts on adjacent land uses to acceptable levels.
- C. In accordance with London Plan Policy D13 Agent of Change, the Council will apply the Agent of Change principle, which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses firmly on the proposed new development sensitive to noise and other nuisances.

Air Quality

- D. The Council promotes good air quality design and new technologies. All developments must comply with London Plan Policy SI 1 Improving Air Quality.
- E. Major developments and large-scale development subject to an Environmental Impact Assessment (EIA) are required to achieve "Air Quality Positive".
- F. All developments must be at least "Air Quality Neutral". Proposals that would materially increase exceedances of local air pollutants will be resisted unless the development mitigates this impact through physical measures and/or financial contributions to implement proposals in Richmond's Local Air Quality Management Plan.
- G. To consider the impact of introducing new developments in areas already subject to poor air quality, the following will be required:
 - 1. an air quality impact assessment, including where necessary modelled data; this also applies to change of use to residential at street level;
 - 2. mitigation measures to reduce the development's impact upon air quality, including the type of equipment installed, thermal insulation and ducting abatement technology;
 - 3. measures to protect the occupiers of new developments from existing sources;
 - 4. strict mitigation for developments to be used by sensitive receptors such as schools, hospitals and care homes in areas of existing poor air quality; this also applies to proposals close to developments used by sensitive receptors;
 - 5. mitigation measures to reduce the impact of transport from the development upon air quality, including support for active travel, electric vehicles and car club membership.
- H. The Council will require financial contributions towards off-site air quality measures where a proposed development is not air quality neutral, or mitigation measures do not reduce the impact upon poor air quality. Specific guidance for air quality in new developments is set out in the Council's Air Quality SPD (2020).

Noise and Vibration

- I. The Council encourages good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected. The following will be required, where necessary:

1. a noise assessment of any new plant and equipment and its impact upon both receptors and the general background noise levels;
 2. mitigation measures where noise needs to be controlled and managed;
 3. time limits and restrictions for activities where noise cannot be sufficiently mitigated;
 4. promotion of good acoustic design and use of new technologies;
 5. measures to protect the occupiers of new developments from existing sources.
- J. Specific guidance for where noise and/or vibration will be an important consideration is set out in Development Control for Noise Generating and Noise Sensitive Development SPD (2018).

Light Pollution

- K. The Council will seek to ensure that artificial lighting in new developments does not lead to unacceptable impacts by requiring the following, where necessary:
1. an assessment of any new lighting and its impact upon any receptors;
 2. mitigation measures, including the type and positioning of light sources;
 3. promotion of good lighting design and use of new technologies.

Odours and Fume Control

- L. The Council will seek to ensure that any potential impacts relating to odour and fumes from commercial activities are adequately mitigated by requiring the following:
1. an impact assessment where necessary;
 2. the type and nature of filtration to be used;
 3. the height and position of any chimney or outlet;
 4. promotion and use of new abatement technologies.

Land Contamination

- M. The Council promotes, where necessary, the remediation of contaminated land where development comes forward. Potential contamination risks will need to be properly considered and adequately mitigated before development proceeds. New development must not pose an unacceptable risk to water quality. Development which has the potential to adversely impact water quality will be required to provide appropriate mitigation to alleviate the risk.

Construction and demolition

- N. The Council will seek to manage and limit environmental disturbances during construction and demolition as well as during excavations and construction of basements and subterranean developments. To deliver this the Council requires the submission of Construction Management Plans (CMPs) for the following types of developments:
1. all major developments;
 2. any basement and subterranean developments;
 3. developments of sites in confined locations or near sensitive receptors; or
 4. if substantial demolition/excavation works are proposed.
- O. Where applicable and considered necessary, the Council may seek a bespoke charge specific to the proposal to cover the cost of monitoring the Construction Management Plan (CMP). The Council will encourage early connection to electric power in the course of development to avoid nuisance from generators. In addition, CMPs will need to demonstrate how they meet the conditions and adhere to the Environment Agency's regulatory position statements on dewatering where applicable.

25.29 Development has an important role to ensure that the environment is respected and protected for future generations. Climate change is now the greatest challenge facing our society. The Local Plan places the environment at the centre of the Council's consideration of new development proposals.

25.30 Development should not contribute to, be at risk from or adversely affected by, unacceptable levels of air, noise, odour, light, soil and water pollution or land instability. Developers should explore ways to minimise any harmful and adverse environmental impacts of development, including during construction and demolition. Where possible, development that is likely to generate pollution should be located away from sensitive uses such as hospitals, schools, care homes and wildlife sites. The design and layout of new development should minimise conflict between different land uses, taking account of users and occupiers of new and existing developments. Therefore, any noisy or polluting activities or features such as plant equipment, should be positioned away from sensitive areas where possible to ensure any detrimental impacts on health, living conditions or amenity are kept to acceptable levels.

25.31 In addition, where there are already significant adverse effects on the environment, amenity or living conditions due to pollution, sensitive uses should ideally be steered away from those areas. However, given the limited availability of land for development in this borough, this will not always be possible. Therefore, new developments, including changes of use, should mitigate and reduce any adverse impacts resulting from air and light pollution, noise, vibration and dust to acceptable levels.

25.32 The Agent of Change principle places the responsibility of mitigating the impact of nuisances (including noise) from existing nuisance-generating uses on proposed new development close by, thereby ensuring that residents and users of the new development are protected from nuisances, and existing uses are protected from nuisance complaints. Applications for new development likely to be

impacted by existing noise or other nuisance-generating uses will require the submission of a relevant impact assessment to determine the impact and help inform the necessary mitigation measures to make the development acceptable. The Agent of Change principle works both ways; therefore, any new nuisance-generating development will need to put in place measures to mitigate noise impacts on existing development close by. Further information on the Agent of Change principle is included in the NPPF, PPG and London Plan, which set out how to mitigate the adverse impacts of noise as well as other such as air and light pollution.

Air Quality

25.33 Good air quality is vital to health and wellbeing. There are a number of areas in the borough that do not comply with the air quality targets and action must be taken to control, minimise and reduce the contributing factors of poor air quality. The whole of the borough has been declared as an Air Quality Management Area (AQMA) and as such any new development and its impact upon air quality must be considered very carefully. Strict mitigation will be required for any developments proposed within or adjacent to 'Air Quality Focus Areas'. An 'Air Quality Focus Area' is a location that has been identified as having high levels of pollution (i.e. exceeding the Government annual mean limit value for nitrogen dioxide) and human exposure. Air Quality Focus Areas are designated by the Greater London Authority. The Council will consider the impact of introducing new developments to areas already subject to poor air quality, and the impact on the new occupiers of that development, especially in sensitive uses such as schools.

25.34 To tackle poor air quality, protect health and meet legal obligations, minor developments are required to be at least "Air Quality Neutral" or "Emissions Neutral". Major development proposals must be submitted with an Air Quality Assessment which will be enough to demonstrate that they are in accordance with Part B1 of London Plan Policy SI 1. However, where characteristics of the development or local features raise concerns about air quality, or where there are

additional requirements for assessment in local policy, a full Air Quality Assessment may be required. Additional measures may also be needed to address local impacts. The Mayor's Air Quality Neutral LPG (2023) and Air Quality Positive LPG (2023) set out air quality benchmarks for all development, as well as a simplified approach for minor developments.

25.35 'Air Quality Positive' means making an active contribution to improving air quality in and around a development site or masterplan area and minimising exposure to existing sources of poor air quality. The key aim of the Air Quality Positive (AQP) Statement is to demonstrate how all aspects of a development – including the buildings, public spaces, landscaping and infrastructure – have responded to their environment, contributed to improvement and implemented best practice in relation to air quality. Compiling the statement should ideally be a continuous process throughout development design.

25.36 Although developers are expected to use appropriate mitigation measures to avoid adverse impacts, the Council will seek financial contributions through the use of Planning Obligations towards air quality measures where a proposed development is not air quality neutral or mitigation measures do not sufficiently reduce the harm to air quality. Developers will be required to contribute to off-site measures by making a financial contribution to the Borough's Air Quality Action Fund (AQAF) secured through a Section 106 Agreement. Further details are set out in the Council's Air Quality SPD including the rates for calculating contributions and how funds will be spent.

25.37 The Council's Air Quality SPD (2020) as well as a Development Control for Noise Generating and Noise Sensitive Development SPD (2018), need to be followed.

25.38 The Council's Air Quality Action Plan 2020–2025 identifies actions and mitigating measures, to be implemented by the Council and partners, to reduce NO₂ and PM₁₀ borough wide from main emission sources including road transport and new developments.

Noise and Vibration

25.39 Noise and/or vibration arise from a variety of sources, such as major roads, railways and aircraft, as well as industrial and commercial sources. This can have a significant effect on health, quality of life, amenity, living conditions and the environment in general. This therefore needs to be considered when new developments may create noise and vibration, and also when new developments would be sensitive to existing conditions.

25.40 Applicants need to consider acoustic design at an early stage of the planning process to ensure occupiers of new and existing noise sensitive buildings are protected. The Council has adopted a SPD for Development Control for Noise Generating and Noise Sensitive Development. This sets out guidance intended to help protect the local occupiers of new or existing noise sensitive buildings from existing or introduced noise sources, and, where possible, improve amenity and living conditions. The SPD will assist applicants, decision makers, agents, occupiers and others to identify issues to be addressed in any planning application in which noise and/or vibration will be an important consideration.

25.41 The Agent of Change principle **places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development.** In other words, the person or business responsible for the change must also be responsible for managing the impact of the change. New development must be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). These existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

Light Pollution

25.42 Though a notable part of the urban environment, artificial lighting when poorly designed, positioned incorrectly or poorly controlled, can have a detrimental effect on receptors such as occupiers, residents, wildlife and ecological habitats, including rivers. As part of the development process steps must be taken to ensure that the impact of artificial lighting is considered carefully.

Odours and Fume Control

25.43 Some commercial activities can have an impact upon the local environment; these impacts can include such things as odours, fumes, dust and steam. As part of the development process steps must be taken to ensure that any impact is considered carefully and that mitigation is in place to manage these types of emissions.

25.44 Applicants will be required to apply the Department for Environment, Food & Rural Affairs' (DEFRA) Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems.

Land Contamination

25.45 A wide range of uses have occurred in the borough throughout its history and there are areas where small scale industrial uses, such as factories, garages, manufacturing works and wharves were once present, and which may have left a legacy of contamination. All new development in the borough is envisaged to occur on previously developed land (i.e. brownfield sites) and therefore remediation is encouraged. The duty to ensure that a safe development is secured on a site that is affected by contamination rests with the developer. Where development comes forward potential contamination risks will need to be properly considered and adequately mitigated before development proceeds. Most of the borough is identified as being at risk of groundwater flooding, which can increase the risk of land contamination from development, and there are identified throughflow and groundwater policy zones. Development will be expected to minimise and mitigate this risk, in line with Policy 8 'Flood Risk and

Sustainable Drainage (Strategic Policy) ' and Policy 9 'Water Resources and Infrastructure (Strategic Policy) ' of this Plan.

25.46 To deliver this the Council will:

1. require a desk top study and preliminary risk assessment, including an assessment of the site's history, potential contamination sources, pathways and receptors;
2. where necessary, require a site investigation and detailed risk assessment in line with current best practice guidance, including where appropriate physical investigations, chemical testing, and interpretation of the results, and assessment of risks to groundwater;
3. where necessary, require a remediation strategy that sets out how any identified risks from the reports above are going to be addressed;
4. where necessary, require a validation report once remediation has taken place, including evidence that demonstrates that risks from contamination have been controlled effectively; and
5. require all above reports and investigations to be carried out by an aptly qualified person.

Construction and demolition

25.47 There is a need to ensure that occupiers are protected from environmental disturbances during the construction and demolition phase of major developments, and in particular during excavating and construction of subterranean developments such as basements.

25.48 The Council requires the submission of Construction Management Plans (CMP) for the types of developments as set out in the policy. In addition, the Council's Good Practice Guide on Basement Developments sets out guidance to ensure that problems relating to excavation and constructions of basements, such as highway/parking impacts, noise, dust, vibration and disturbance to neighbours, are avoided. Developers of basements are also expected to sign up to a Considerate Construction Scheme. To manage the environmental impacts and

ensure that the Construction Management Plans are adhered to, the Council will seek a charge to the applicant/developer to cover the cost of monitoring the CMP. Where an applicant/developer uses the Council's Building Control services, a discount may be applied to this charge.

- 25.49** The Council also requires developers to set out in a mitigation measures statement attached to the CMP how they will monitor dust, noise and vibration, and where necessary take the appropriate action if issues arise. It will also be necessary to control the hours of operation for noisy site

works and the processes that would need to be followed in order to work outside these hours when and if required. As part of the Council's commitment to better air quality, the Council will also request, through planning conditions, that the GLA Regulation relating to Non-Road Mobile Machinery (NRMM) is imposed at all times. The CMP needs to address possible contamination of local surface water and groundwater bodies, and development proposals need to strictly adhere to the Environment Agency's regulatory position statements on dewatering; an environmental permit may be required by the Environment Agency in this regard.

Policy 54

Basements and Subterranean Developments

- A. The Council will resist subterranean and basement development of more than one storey below the existing ground level to residential properties or those which were previously in residential use.
- B. Proposals for subterranean and basement developments will be required to comply with the following:
1. extend to no more than a maximum of 50% of the existing garden land or more than half of any other undeveloped garden area (this excludes the footprint of the original building);
 2. demonstrate the scheme safeguards the structural stability of the existing building, neighbouring buildings and other infrastructure, including related to the highway and transport; a Structural Impact Assessment will be required where a subterranean development or basement is added to, or adjacent to, a listed building.
 3. use natural ventilation and lighting where habitable accommodation is provided to ensure the health and well-being of its occupants;
 4. include a minimum of 1 metre naturally draining permeable soil above any part of the basement beneath the garden area, together with a minimum 200mm drainage layer, and provide a satisfactory landscaping scheme;
 5. demonstrate that the scheme will not increase or otherwise exacerbate flood risk on the site or beyond, in line with Policy 8 'Flood Risk and Sustainable Drainage (Strategic Policy)'; a site specific Screening Assessment, undertaken by a chartered professional, is required to assess likely impacts from subterranean development within throughflow and groundwater policy zones and/or in an area with $\geq 25\%$ susceptibility to groundwater flooding; if the Screening Assessment determines that the proposed subsurface development may have an impact on the local environment, or if it determines that further investigation work is required, then a Basement Impact Assessment is required;
 6. where the proposal contains a waste outlet, install a suitable (positively) pumped device to protect the development from sewer flooding, in line with Policy 8 'Flood Risk and Sustainable Drainage (Strategic Policy)';
 7. demonstrate as part of a Construction Management Plan that the development will be designed and constructed so as to minimise the impact during construction and occupation stages (in line with Policy 53 'Local Environmental Impacts');
 8. demonstrate that the proposal does not cause loss, damage or adverse impact to biodiversity, including trees, and amenity value; and