

London Borough of Richmond upon Thames

List of Council's Additional Modifications to the Local Plan Publication Version

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Background

Following the Hearing Sessions as part of the Examination in Public (25th June to 10th July 2024), the Planning Inspectors, Jameson Bridgwater PGDipTP MRTPI and Graham Wyatt BA(Hons) MRTPI, have proposed a list of Main Modifications to the Plan. These are subject to consultation from 31 January to 17 March 2025. The proposed Main Modifications (including changes to the Policies Map designations where relevant) have been subject to Sustainability Appraisal and Habitats Regulation Assessment. www.richmond.gov.uk/draft_local_plan_examination

This document sets out Additional Modifications which are minor changes put forward by the Council during the Examination. They have been published for completeness to aid and clarify to all those with an interest in the final form of the Plan. These Additional Modifications are not before the Inspectors; they are changes the Inspectors do not consider necessary to ensure the soundness of the submitted Plan.

How to use this document

- The items below are set out in the order of the Local Plan, as identified under the heading 'Section of the Plan'. The Additional Modifications take the format that proposed additions to the text are recorded in highlighted and underlined text, and proposed deletions are recorded with a highlight and strikethrough.

 For example: 'This text is to be retained and this text is to be added but this text is to be deleted.'
- The page and paragraph numbers listed below are those in the Publication (Regulation 19) Local Plan published for consultation from 9th June to 24th July 2023 (SD-001).

Change Ref.	Page	Section of the Plan	Proposed Modification
			Introduction
AM1	5	Introduction, paragraph 2.5	To reflect updated National Policy Planning Framework (2023):

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			The Local Plan has been prepared within the context of a hierarchical framework of planning legislation and policy for England. At the top of the hierarchy are a number of planning related Acts of Parliament and Statutory Instruments, the National Planning Policy Framework 2021 (NPPF) which sets out Government's planning policies for England and how these should be applied, and the Planning Practice Guidance (PPG).
			To update the supporting text in relation to the Government's plan-making reforms, and add a new paragraph to reference the update to the NPPF for clarity:
AM2	7	Introduction, paragraph 2.16	The Government announced in 2020 a wide range of proposals for the reform of the planning system, including fundamental changes as to how Local Plans are prepared. However, the Government's Chief Planner also advised local authorities that they should not let uncertainties stop them from progressing on the development of Local Plans. The plan-making reforms in the Levelling Up and Regeneration Bill Act (LURB) are being brought forward, however there will need to be secondary legislation/regulations and a transition period, therefore the changes will only be relevant to the next Richmond Local Plan, as this Plan is being prepared under the transitional arrangements.
			Annex 1 of the NPPF (December 2023) set out that under transitional arrangements this Local Plan will be examined under the relevant previous version of the Framework as applicable at the time of pre-submission. This Plan has been examined against the NPPF as at September 2023, however for readability references are also made to the version as at December 2023.
AM3	8	Introduction, Bullet point - Updated local evidence	To include reference to the Retail & Leisure Needs Study – Update Addendum (April 2024) (PSED-02): Under bullet point entitled "Updated local evidence". After "Richmond upon Thames Retail and Leisure Study Phase 1 (2021) and Phase 2 (2023)" add "and Update Addendum April 2024"
			Vision and Strategic Objectives

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AM4	13	Strategic Vision, sixth paragraph in the 'vision' box	To update terminology in Plan: All of the borough's main town centres have capitalised on how much they are enjoyed by those living in the local area, as well as providing a wider offer attracting visitors.
AM5	13	Strategic Vision, seventh paragraph in the 'vision' box	To update terminology in the Plan: Office space in our main town centres has adapted and local hubs provide space to work,
			Spatial Strategy, Place-based Strategies and Site Allocations
			Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy)
AM6	19	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy), Information box	Remove the information note box following Policy 1, which was included for the Publication consultation only. Information note for the Publication consultation: this policy is not about limiting movement. There are some concerns expressed that this concept, along with traffic measures, would restrict journeys. Any such restrictions are beyond the remit of the Local Plan and are not what the policy seeks to do. It is merely seeking to bring about a pattern of development that makes it an easy choice to 'live locally' and aims to improve, not restrict, accessibility and movement.
			Policy 2 Spatial Strategy: Managing change in the borough (Strategic Policy)
AM7	23	Policy 2: Spatial Strategy, Paragraph 4.19	Update the supporting text to reference the updated evidence bases, and clarify this is an overarching summary of the key evidence that informed the Plan: 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 were undertaken, which indicated the following overarching position.
			Places

Change Ref.	Page	Section of the Plan	Proposed Modification
			Site Allocations
AM8	Various	Site Allocations, Heritage assets (as relevant)	[See also Statement of Common Ground with Historic England (signed 04/06/2024) (SOCG-10)] For clarity, refer to all Archaeological Priority Areas (APAs) followed by detail of the relevant zone - • Site Allocation 9: amend the text: Archaeological Priority Area: Zone – Teddington • and in all other Site Allocations where relevant
			Site Allocation 2 Platts Eyot, Hampton
AM9	34	Site Allocation 2 Platts Eyot, 'Proposed Site' at beginning/top of Context box	Clarify the full site address at beginning/top of box: Platts Eyot, Lower Sunbury Road, Hampton, TW12 2HF
AM10	35	Site Allocation 2 Platts Eyot, 'Heritage Assets' section in Context box	Change bullets to dashes, for formatting consistency Swap for (and in other parts of Site Allocations where relevant)
			Site Allocation 9 Teddington Police Station, Park Road, Teddington
AM11	58	Site Allocation 9, Teddington Police Station, 'Type of centre' section in Context box	To update terminology in Plan. In context box, fourth column, amend as follows: Teddington Main Town Centre Boundary
AM12	60	Site Allocation 9, Teddington Police Station, 'Vision' section, second bullet point	To update terminology in the Plan. In section entitled Vision – Amend second bullet point as follows: The site is within Teddington Town Centre but does not form part of the key Primary sShopping Aarea.
			Site Allocation 13 Twickenham Stadium, Twickenham
AM13	76	Site Allocation 13 Twickenham Stadium, 'Access to Open Space' box within 'Context Section' fourth bullet point	Replace '-' bullet with '•' for consistency: '-• Metropolitan Open Land (MOL)'

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AM14	77	Site Allocation 13 Twickenham Stadium, fifth bullet point	Typo correction: The submission of an odour impact assessment would be requireds upfront.
			Site Allocation 14 Mereway Day Centre, Twickenham
AM15	80	Site Allocation 14 Mereway Day Centre, second bullet point of 'Relevant Planning History' in 'Context' box	 Update the planning history: An application has been submitted and is awaiting validation for a residential development and associated car parking was granted planning permission 01/02/2024 (ref. 23/0260/FUL).
			Site Allocation 16 Twickenham Telephone Exchange
AM16	85	Site Allocation 16 Twickenham Telephone Exchange, 'Type of centre' section in Context box	To update terminology in Plan. In context box, fourth column, amend as follows: Twickenham Main Town Centre Boundary
AM17	86	Site Allocation 16 Twickenham Telephone Exchange, 'Flood risk' section in Context box	To update terminology in Plan. In context box, second column, amend as follows: • Main Town Centre Boundary Buffer Zone
			Site Allocation 17 Twickenham Riverside and Water Lane/King Street
AM18	88	Site Allocation 17 Twickenham Riverside and Water Lane/King Street, 'Type of centre' section in Context box	To update terminology in Plan. In context box, fourth column, amend as follows: Twickenham Main Town Centre Boundary
AM19	89	Site Allocation 17 Twickenham Riverside and Water Lane/King Street, 'Flood risk' section in Context box	To update terminology in Plan. In context box, second column, make following change: • Main Town Centre Boundary Buffer Zone
AM20	90	Site Allocation 17 Twickenham Riverside and Water Lane/King	To update terminology in Plan. Second sentence of second bullet point of Vision: Retail should be maintained at ground-floor ien the existing Primary Shopping Area retail frontage of King Street.

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		Street, 'Vision' section, second bullet point	
			Site Allocation 18 Homebase,Twickenham Road, Hanworth
AM21	94	Site Allocation 18 Homebase, 'Vision' section, third bullet point	To update terminology in the Plan. In section entitled Vision - Amend first sentence of third bullet point as follows: As the site is located outside of a town centre and defined Primary Shopping Area and defined retail frontage, the existing retail use is not protected.
			Site Allocation 19 Fulwell Bus Garage, Twickenham
AM22	97	Site Allocation 19 Fulwell Bus Garage, 'Vision' section, third	To update terminology in the Plan. In section entitled Vision - Amend first sentence of third bullet point as follows: As tThe site is located outside of a town centre and defined Primary Shopping Area and defined
		bullet point	retail frontage, the existing retail use is not protected.
AM23	97	Site Allocation 19 Fulwell Bus Garage, fourth bullet point	Remove erroneous bracket: There is a need for housing in the borough and this site is suitable for a substantial provision of new housing units, including a policy compliant level of affordable housing.
			Site Allocation 20 Telephone Exchange, Ashdale Close, Whitton
AM24	101	Site Allocation 20 Telephone Exchange, 'Type of centre' section in Context box	To update terminology in Plan. In context box, fourth column, make following change: Whitton main town centre boundary
AM25	101	Site Allocation 20 Telephone Exchange, 'Vision' section, first paragraph, third and fourth bullet points	To update terminology in Plan. In Vision amend as follows: Second sentence: Appropriate land uses include employment and social infrastructure or other appropriate main town centre uses. Third bullet: Any redevelopment proposal should provide for employment and social infrastructure or other appropriate main town centre uses. Fourth bullet:

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			Only if other main town centre uses as well as social infrastructure or community uses have been explored
			Site Allocation 22 Whitton Community Centre, Whitton
AM26	110	Site Allocation 22 Whitton Community Centre, 'Vision' section, sixth bullet point	To correct a factual error, delete from the last bullet point in the Vision: the Kneller Hall SPD and accompanying Heritage Assets Assessment and
		oixer buildt point	Site Allocation 23 Ham Close, Ham
AM27	116	Site Allocation 23 Ham Close, 'Relevant Planning History' box in 'Context' section	Update the planning history: 22/1442/FUL - Demolition of existing buildings on-site and change of use of land within Ham Close, the Woodville Day Centre and St Richards Church of England Primary School and the existing recycling and parking area to the east of Ham Village Green for a phased mixed-use redevelopment comprising: a. 452 residential homes (Class C3) up to 6 storeys (with plant above) b. Community/Leisure Facility (Class F2) of up to 3 storeys in height (with plant above) c. Maker labs (sui generis) of up to 2 storeys d. Basement car park e. Provision of on-site cycle, vehicle and servicing parking f. Provision of amenity space and playspace g. Site wide landscaping and alterations to Ham Village Green, and h. New pedestrian, vehicle and cycle accesses and internal routes and associated highways works Committee resolution to approve subject to referral to the GLA at Stage 2 and no adverse direction being received, and conditions/informatives. Permission granted 22/03/2023.
			Site Allocation 24 Cassel Hospital, Ham
AM28	119, 120	Site Allocation 24 Cassel Hospital, Ham Common, 'Description of Current Site Character' in 'Context' section, 'Vision' section, first bullet point	Correct the references to the operator of the site. Amend in the description of current site character: Owned by West London Mental Health Trust (WLMHT) West London NHS Trust Amend in the 1st bullet point of 'Vision' section: Development is dependent on the hospital being declared surplus to requirements and WLHMT's West London NHS Trust's decision

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			Site Allocation 25 Richmond Station, Richmond
AM29	126	Site Allocation 25 Richmond Station, 'Type of centre' section in Context box	To update terminology in Plan. In context box, fourth column, amend as follows: Richmond Main Town Centre Boundary - Richmond
AM30	127	Site Allocation 25 Richmond Station, Richmond. 'Relevant Planning History' box within 'Context' section	Factual update to the planning history for clarity. Delete text and replace with following: None. Planning permission granted 11/06/2024 under application reference 23/3371/FUL for creation of two additional levels of Class 3 accommodation comprising 7no. units at Westminster House.
			Site Allocation 29 Homebase, Manor Road, North Sheen
AM31	140	Site Allocation 29 Homebase, Manor Road, 'Relevant Planning History' box within 'Context' section	Factual update to the planning history for clarity. Delete text and replace with following: An application (ref. 19/0510/FUL) for redevelopment of the site for a residential-led scheme to provide 385 homes (35% affordable) was refused by Planning Committee in July 2019 on grounds of under-provision of affordable housing, visual impact, residential standards and sustainability. The application was called in by the Mayor of London (ref. GLA/2020/6252/s3) and during the process the scheme was revised to increase the number of homes to 453. The proposal includes buildings up to 11 storeys. The Mayor resolved to grant permission but a decision remains outstanding. Permission has been granted and the decision notice was issued 23/05/2024.
AM32	141	Site Allocation 29 Homebase, Manor Road, 'Vision' section, third bullet point	Delete erroneous bracket: There is a need for housing in the borough and this site is considered suitable for a substantial provision of new housing units including a policy compliant level of affordable housing.
			Site Allocation 31 Kew Retail Park, Kew
AM33	151	Site Allocation 31 Kew Retail Park, 'Vision' section, 'Vision' section, eighth bullet point	Correct the typo: The applicant will be required to submit a full transport assessment completed in accordance with local and London-wide guidance.
		Au 111 11 22 22	Site Allocation 32 Kew Biothane Plant, Kew
AM34	154	Site Allocation 32 Kew Biothane Plant,	Update the planning history:

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		'Relevant Planning History' in 'Context' box	An application for 88 residential specialist extra care home of 4-6 storeys was granted planning permission at Committee 16/09/2020 (ref. 18/3310/FUL). Works commenced on site but have not been completed. This permission has not been implemented.
AM35	155	Site Allocation 32 Kew Biothane Plant, 'Vision' section, third bullet point	Typo correction: The submission of an odour impact assessment would be required upfront.
			Site Allocation 35 Stag Brewery, Mortlake
AM36	168	Site Allocation 35 Stag Brewery, 'Description of Current Site Character' in 'Context' box, second paragraph	Typo correction: Access is boa via Lower Richmond Road, Williams Lane and Ship Lane.
AM37	168	Site Allocation 35 Stag Brewery, 'Relevant Planning History' in 'Context' box, third bullet point	'There are currently 2 live planning applications under consideration for outline and full permission for a phased redevelopment of the site for demolition, extension and new buildings (3-9 storeys) for a mixed-use scheme comprising residential, flexible-use space (retail, offices), cinema, hotel/pub and secondary school and sixth form.' Planning Committee resolved to grant full and outline planning permission on 18/07/2023 (application refs. 22/0900/OUT & 22/0902/FUL) for a phased redevelopment of the site for demolition, extension and new buildings (3-9 storeys) for a mixed-use scheme comprising residential, flexible-use space (retail, offices café/restaurant, drinking establishment, non-residential institutions and community use and boathouse), hotel/pub, cinema and secondary school and sixth form. Appeal Lodged on 28/02/2024.
			Site Allocation 37 Telephone Exchange and 172 – 176 Upper Richmond Road West, East Sheen
AM38	174	Site Allocation 37 Telephone Exchange and 172 – 176 Upper Richmond Road West, 'Type of centre' section in Context box	To update terminology in Plan. In context box, fourth column, amend as follows: East Sheen Main Town Centre
			Policy 10 New Housing (Strategic Policy)

Change Ref.	Page	Section of the Plan	Proposed Modification
AM39	215	Policy 10 New Housing (Strategic Policy), Paragraph 17.8	To update terminology in Plan. Amend second sentence as follows: The Council will encourage higher density development in more sustainable locations, such as main town centres and areas better served by public transport, subject to compatibility with established character.
			Policy 12 Housing Needs of Different Groups
AM40	226	Policy 12 Housing Needs of Different Groups, Paragraph 17.46	Update the timescale for publication of the London-wide gypsy and traveller accommodation needs assessment: the Mayor will initiate and lead a London-wide gypsy and traveller accommodation needs assessment, with a report due to be published in 20235,
			Policy 17 Supporting our Centres and Promoting Culture (Strategic Policy)
AM41	240	Policy 17 Supporting our Centres and Promoting Culture (Strategic Policy), Paragraph 18.2	To update terminology in Plan. Amend first sentence as follows: The borough's five main town centres comprising steering major development into the five town the principal centre of Richmond and the four centres. Richmond town centre in particular district centres of Twickenham, Teddington, is where the majority of commercial East Sheen and Whitton make up the first tier development is expected to be focused. of the borough's centre hierarchy.
AM42	241	Policy 17 Supporting our Centres and Promoting Culture (Strategic Policy), Paragraph 18.9	Update the figure on borough-wide centre vacancy rate, to reflect publication vacancy rates in the borough's centres 2023 (Town Centre Land Use Survey) (January 2024) (SD-088): Together with a borough-wide centre vacancy rate of 7.88.1% in all frontages (Town Centre Land Use Retail Survey 20223), the priority
AM43	242	Policy 17 Supporting our Centres and Promoting Culture (Strategic Policy), Paragraph 18.12	To reflect updated National Policy Planning Framework (December 2023): Primary Shopping Areas (PSAs) have been defined, as required by paragraph 86 90 of the NPPF, for the five town centres only.
			Policy 22 Promoting Jobs and our Local Economy
AM44	256	Policy 22 Promoting Jobs and our Local Economy, Part B	Amend the cross-reference to Policy 50 to correct a typographical error: B. Proposals must provide opportunities for local employment and training, as required by Policy 50 'Education and Training (Strategic Policy)' part D.

Change Ref.	Page	Section of the Plan	Proposed Modification
			Policy 23 Offices
AM45	259	Policy 23 Offices, Paragraph 19.20	To reflect updates to the National Policy Planning Framework in 2023: It is recognised that this could potentially compromise the ability of the Council to protect existing office space in line with this policy, as well as with the requirements of paragraphs 80 81 and 84 82 of the September 2023 NPPF.
			Policy 26 Visitor Economy
AM46	268	Policy 26 Visitor Economy, Paragraph 19.53	Correct the policy reference: London Plan Policy E10 seeks an additional 58,000 bedrooms of serviced accommodation by 2041,
			Policy 28 Local Character and Design Quality (Strategic Policy)
AM47	273	Policy 28 Local Character and Design Quality, Paragraph 20.5	Delete reference to the Front Gardens SPD (this was superseded and withdrawn following the adoption of the Transport SPD in 2020): The Council has also developed a range of other SPDs, including on Design Quality, House Extensions and External Alterations, Small and Medium Housing Sites, Front Gardens and Shopfronts.
			Policy 32 Royal Botanic Gardens, Kew World Heritage Site
AM48	285	Policy 32 Royal Botanic Gardens, Kew World Heritage Site, Paragraph 20.53	The Royal Botanic Gardens, Kew World Heritage Site Management Plan provides a framework for guiding the activities that take place in the site
			Policy 34 Green and Blue Infrastructure (Strategic Policy)
AM49	287	Policy 34 Green and Blue Infrastructure (Strategic Policy) Part B Point 4	Correct spacing error: 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.
			Policy 35 Green Belt, Metropolitan Open Land and Local Green Space
AM50	295	Policy 35 Green Belt, Metropolitan Open Land and Local Green	To reflect updates to the National Policy Planning Framework in 2023: In addition, paragraphs 137 – 151 of the September 2023 NPPF 2021 / paragraphs 142 – 156 of the December 2023 NPPF and any future amendments on Green Belts applies equally to MOL.

Change Ref.	Page	Section of the Plan	Proposed Modification
		Space, Paragraph 21.10	
			Policy 39 Biodiversity and Geodiversity
AM51	310	Policy 39 Biodiversity and Geodiversity, Part C first sentence	Remove erroneous apostrophe: In accordance with the London Plan Policy G6 (Biodiversity and access to nature), in addition to the need to follow the above hierarchy approach, the following mitigation hierarchy will also be applied to SINC's:
			Policy 44 Design Process
AM52	325	Policy 44 Design Process, Part E	Correct spacing error:Policy 31 'Views and Vistas and shown in the Policies Map
			Update the supporting text, as the Council's Raising the Bar guidance, was adopted in April 2024:
AM53	327	Policy 44 Design Process, Paragraph 22.11	The Council's is also producing further guidance, 'Raising the Bar – Early Engagement Guidance for Applicants', has been adopted to aid developers with their consultation process and set out best practice, along with the Council's expectations for achieving high quality engagement.
			Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management
AM54	344	Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management	To correct paragraph numbering error in Policy 48: E has been skipped in error so all from Policy 48 Part F onwards to be changed by one letter
AM55	344	Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management, Part C and Part F.3.	Amend the references to: London Cycle Cycling Design Standards
			Policy 50 Education and Training (Strategic Policy)
AM56	357	Policy 50 Education and Training (Strategic	Amend the cross-reference in paragraph 24.40 to correct a typographical error in the supporting text:

Change Ref.	Page	Section of the Plan	Proposed Modification
		Policy), paragraph 24.40	The obligation set out in part B D of the policy for an LEA between the developer and the Council will therefore apply to
			Policy 53 Local Environmental Impacts
AM57	365	Policy 53 Local Environmental Impacts, Part A	Add full stop to last sentence: These potential impacts can include, but are not limited to, air pollution, noise and vibration, light pollution, odours and fumes, solar glare and solar dazzle as well as land contamination.
			Glossary
AM58	381, 386, 387	Glossary	To reflect updates to the National Policy Planning Framework in 2023: Centre Hierarchy – The hierarchy of centres in the borough categorises centres and parades into 4 types – town centres, local centres, neighbourhood centres and Important Local Parades. They range significantly in size and function. Paragraph 86 of the September 2023 NPPF/ Paragraph 90 of the December 2023 NPPF requires local planning authorities to define such a hierarchy. Local Green Space (LGS) – Local communities can identify green or open space which is of special quality and holds particular significance and value to the local community which it serves, in line with paragraphs 101 to 102 of the September 2023 NPPF/ paragraphs 105 to 106 of the National Planning Policy Framework (NPPF) National Planning Policy Framework (NPPF) – The NPPF sets out the Government's planning policies for England and how these are expected to be applied, alongside other national planning policies The current edition of the NPPF was published in July 2021 December 2023, although in line with transitional arrangements this Plan has been examined against the September 2023 version, and further updates have recently may been subject to consultation by the Department for Levelling Up, Housing, and Communities.
			Appendices
AM59	410	Appendix 2 Marketing Requirements, Paragraph 28.6	To update terminology in Plan. Amend as follows: Where a proposal involves a change of use away from retail that is not supported by policy within designated and non-designated shopping frontages, marketing must also include the following:

Change Ref.	Page	Section of the Plan	Proposed Modification
AM60	411	Appendix 2: Marketing requirements, Paragraph 28.12	To correct error – section relates to industrial land and business parks. 28.12 Please note that provision of marketing will not be accepted as justification for an exception to policy; there should be no net loss of effice industrial floorspace.