

# GREATER LONDON AUTHORITY

Date of meeting	Relevant part of the minutes
5 September 2022	<p><b>GLA (xx/xx)</b> – to check in with GLA planners about Richmond Homebase scheme.</p> <p><b>GLA (xx/xx)</b> – to check in with HoA / Area Managers regarding schemes discussed (RHP, Ham Close – planning; Richmond education site – xx ).</p> <p><b>LBR (xx)</b> – to circulate Twickenham Riverside viability information when suitable to do so.</p>
6 June 2022	<p><b>Outstanding action – GLA (xx)</b> to pull together report of Housing Association bids in LB Richmond and Wandsworth in relation to specific allocations for 21-26 programme.</p> <p><b>GLA (xx/xx)</b> – to check in with GLA planners about Richmond Homebase scheme.</p>
7 March 2022	Nothing within scope of your request.
6 December 2021	<p>GLA spreadsheet of LBR schemes in the Affordable Housing Programme. <b>GLA (xx)</b> to send partner list before next meeting.</p> <p>Twickenham Riverside scheme. <b>Richmond (xx / xx)</b> to provide high-level viability with [xxx]. To include all costs Richmond incurred to date and to advise on best case scenario with xx and when scheme is forecast to start on site.</p> <p>Teddington police station</p> <ul style="list-style-type: none"> <li><b>GLA (xx)</b> to check with Public Land lead regarding where things are at with the site.</li> </ul>
5 August 2021	No minutes available as these record actions only (n/a for this meeting).
25 November 2019	No minutes available as these record actions only (n/a for this meeting).
31 January 2019	<p>LB Richmond updates</p> <ul style="list-style-type: none"> <li>Homebuilding Capacity Fund – what to achieve?</li> <li>Public sites where optimisation can be realised</li> <li>Stag Brewery Site</li> <li>Kneller Hall (MOD site) – 50% affordable</li> <li>Barnes Hospital site?</li> </ul>

# GREATER**LONDON**AUTHORITY

	<ul style="list-style-type: none"><li>• Other large sites coming forward that are going to RP's or are willing to discuss?</li><li>• Any opportunities where we can help unlock and leverage? Key opportunities?</li></ul>
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[REDACTED], Spatial Planning &  
Design Team Manager  
Spatial Planning and Design,  
London Borough of Richmond upon Thames, Civic  
Centre,  
44 York Street,  
Twickenham,  
TW1 3BZ

**Department: Planning**  
Our reference:  
LDF27/LDD13/SPD01/HA01  
Date: 1 August 2022

By email: [REDACTED]  
[REDACTED]  
[REDACTED]

Dear [REDACTED]

**Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(5) (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations 2012**

**RE: Draft Revised Affordable Housing Supplementary Planning Document**

Thank you for consulting the Mayor of London on the draft Revised Affordable Housing Supplementary Planning Document (SPD). As you are aware, all Local Development Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004). While the draft Supplementary Planning Document is not a Development Plan Document, it is considered to be a Local Development Document. As such the Mayor may give an opinion as to the general conformity of the Local Development Document with the London Plan under section 24(5) of the PCPA 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below.

This letter provides advice and sets out where you should consider making amendments so that the draft document is consistent with the London Plan 2021 (LP2021). The LP2021 was formally published on the 2 March 2021 and now forms part of the London Borough of Richmond Upon Thames' Development Plan.

**The threshold approach**

Richmond's current Local Plan was adopted in July 2018 and the draft SPD supports the affordable housing approach set out in that Plan. Local Plan Policy LP 36 is not

consistent with the Mayor's threshold approach to affordable housing which is set out in Policies H4 and H5 of the LP2021. Instead the policy promotes and relies on the use of viability testing to determine the maximum reasonable amount of affordable housing that can be delivered on a case by case basis.

It is noted that paragraph 3.6 of the draft SPD currently reads,

"The Council will seek the **maximum reasonable amount** of affordable housing when negotiating on individual private residential and mixed-use schemes, having regard to the strategic borough-wide target set out in the Local Plan and the individual circumstances of the site, including the **financial capacity to contribute towards affordable housing.**"

Consequently, it is clear that the intention of the draft SPD is to continue to promote the maximum reasonable approach to affordable housing delivery by viability testing all major residential proposals (over ten dwellings) on a case-by-case basis. This approach has consistently led to low levels of affordable housing delivery in London and is the reason why the Mayor has developed an alternative threshold approach for the delivery of affordable housing which embeds affordable housing requirements into land values.

Policy DF1 part A of the LP2021 is clear that the use of viability evidence to underpin affordable housing delivery should be limited only to those instances where there are clear barriers to its delivery. Aligned with this, the Mayor's threshold approach seeks to limit the use of viability evidence to those situations where schemes genuinely cannot deliver 35% or more affordable housing without grant on privately owned land (or 50% on publicly owned land and on industrial land where it would lead to a loss of industrial capacity).

The Mayor notes paragraph 4.5 of the draft SPD which states that

"Until weight can be given to the emerging policy, the Mayor's threshold approach will only apply on referable schemes; on schemes which do not meet the referable criteria for call-in by the Mayor, the Council will continue to seek to influence site-specific viability discussions..."

This would mean that the Mayor's threshold approach would not apply to major planning applications below the referral threshold- resulting in fewer numbers of affordable homes being delivered.

In Richmond over the period between 2016/17 and 2018/19 major developments contributed an average of 22% affordable housing.

In contrast, the report, Affordable Housing in Planning Applications Referred to the Mayor of London (March 2022) <sup>1</sup> clearly illustrates the positive effect the threshold approach is having on the delivery of affordable housing across London. In 2021 the

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1

[https://www.london.gov.uk/sites/default/files/affordable\\_housing\\_in\\_planning\\_applications\\_referred\\_to\\_the\\_mayor\\_2011-2021.pdf](https://www.london.gov.uk/sites/default/files/affordable_housing_in_planning_applications_referred_to_the_mayor_2011-2021.pdf)

average level of affordable housing per scheme was 43 per cent by unit and 45 per cent by habitable room. The analysis indicates that the proportion of affordable housing secured in referable applications has increased significantly in recent years. 82% of referable schemes approved in 2021 will provide 35% or more affordable housing (by habitable room). For each of the last three years, 35% or more affordable housing has been secured in more than three quarters of referable applications. In 2021, 61% of eligible schemes followed the Fast Track Route, up from 52% in 2020 and 38% in 2019.

The LP2021 was formally published in March last year and therefore forms the most up-to-date part of Richmond's Development Plan. Furthermore, the Council's use of the maximum reasonable approach has resulted in low numbers of affordable housing while the threshold approach is seeing consistent increases across London. In light of this, Richmond should give the Mayor's threshold approach set out in Policy H5 the full weight accorded the Development Plan under S38(6) of the Planning and Compulsory Purchase Act 2004 – and this should be applied to all major development proposals. Through the application of the threshold approach to all major residential proposals Richmond is far more likely to deliver more affordable housing.

In addition, Richmond should also note that the threshold approach would speed up the planning process and would be less resource intensive than viability testing all major residential proposals (apart from those referred to the Mayor) under the policy target of achieving 50% affordable housing.

The draft document should also make it clear that public sector landowners with a portfolio agreement with the Mayor, such as Transport for London, may provide 50% affordable housing across their portfolio of sites - provided at least 35% affordable housing is provided on each site, with the required affordable housing tenure split on the initial 35%.

### **Tenure mix**

The proposed tenure mix set out at paragraph 3.14 of the draft SPD reflects the mix set out in the current Local Plan. This is for 80% affordable rent and 20% intermediate housing. While the Mayor recognises and understands that there is a greater need for affordable rented housing in London the proposed affordable housing tenure mix diverges from the requirement in Policy H6 of the LP2021. Policy H6 sets a requirement that at least 30% of affordable housing should be for low-cost rented homes and at least 30% should be for intermediate products. The policy gives boroughs considerable flexibility allowing boroughs to allocate the remaining 40% requirement according to borough but should be based on local and up-to-date evidence. The minimum level of intermediate housing should therefore not be less than 30% to be consistent with Policy H6 and it should be amended accordingly.

### **Build to rent housing**

Paragraph 5.4 of the draft SPD states that

“...private rented sector schemes that do not contribute to the higher priority need for affordable housing are unlikely to be supported due to the overriding need for affordable housing...”.

It should be recognised that Build to Rent housing differs from traditional private rented sector housing. The Mayor supports boroughs in taking a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes and paragraph 4.11.1 of the LP2021 sets out how this housing product can be beneficial in London, for example by providing better management standards and better quality homes than much of the mainstream private rented sector. The draft SPD should differentiate between build to rent and private rented housing and should be consistent with Policy H11 of the LP2021.

Build to Rent housing proposals are required through Policy H11 of the LP2021 to provide affordable housing so paragraph 5.4 of the draft SPD is incorrect. The Mayor's threshold approach to affordable housing applies to Build to Rent housing and this should be made clear in the draft SPD. Policy H11C of the LP2021 is clear that to follow the Fast Track Route (see Policy H5 of the LP2021), schemes must deliver at least 35%, or 50% where the development is on public sector or industrial land (where residential development would result in a loss of industrial capacity). Richmond should also note that the LP2021 at paragraph 4.11.10 makes it clear that boroughs can require a proportion of low-cost rent on Build to Rent schemes in accordance with Part A of Policy H6. Low-cost rent homes must be managed by a registered provider.

With respect to paragraphs 6.1 and 6.2 regarding industrial land, the correct approach to proposed residential development on industrial land is set out in Policy E7 of the LP2021. That policy seeks to protect industrial 'capacity' as opposed to industrial 'land' and in some circumstances residential development within industrial areas may be considered appropriate where it meets the requirements of that policy. Within Locally Significant Industrial Locations the Mayor would support co-location with residential uses where the requirements set out in Policy E7B of the LP2021 have been met through a plan-led or a masterplanned approach. It should also be noted that the LP2021 could support residential development proposals on non-designated industrial land where it meets the requirements of Policy E7C.

## **Summary**

As currently written the draft SPD is not in general conformity with the LP2021 due to the failure to apply the Mayor's threshold approach to affordable housing to all major residential proposals set out in Policy H5 and for a failure to apply the minimum affordable housing tenure requirements set out in Policy H6 of the LP2021.

I hope these comments help to positively inform the ongoing development of Richmond's Draft Revised Affordable Housing SPD. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact [REDACTED]

[REDACTED]

Yours sincerely,



Lucinda Turner

**Assistant Director of Planning**

Cc     Nick Rogers, London Assembly Constituency Member  
        Sakina Sheikh, Chair of London Assembly Planning Committee  
        National Planning Casework Unit, DLUHC

[REDACTED]  
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**Department: Planning**  
Our reference: LDF22/LDD16/LP02/HA01  
20 March 2020

By email: [REDACTED]

Dear Andrea

**Planning and Compulsory Purchase Act 2004 (as amended)  
Greater London Authority Acts 1999 and 2007  
Town and Country Planning (Local Development) (England) Regulations 2012**

**RE: Richmond Local Plan Direction of Travel Consultation**

Thank you for consulting the Mayor of London on the London Borough of Richmond's Local Plan Direction of Travel. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) has provided comments, which I endorse, and are attached at Annex 1.

The Mayor is pleased to have the opportunity to comment on this early, non-statutory consultation to inform the development of Richmond's new Local Plan. This letter provides advice and sets out where Richmond should alter its proposed approach to be more in line with the Intend to Publish London Plan.

**The draft new London Plan**

As you know, the Mayor published his draft new London Plan for consultation on 1st December 2017. The Panel's report, including recommendations, was issued to the Mayor on the 8th October 2019 and the Intend to Publish London Plan was published on 17th December 2019. The Mayor has received the response from the Secretary of State to his Intend to Publish London Plan and is considering his response. In due time, my officers will be happy to discuss any implications for Richmond's Local Plan.

Publication of the final version of the new London Plan is anticipated in the Summer, at which point it will form part of Richmond's Development Plan and contain the most up-to-date policies.



Richmond's new Local Plan will be required to be in general conformity with the new London Plan. The Intend to Publish London Plan and its evidence base are material considerations in planning decisions.

## **General**

The Mayor recognises that this is a non-statutory consultation and is a pre-cursor to the formal Regulation 18 draft of the Local Plan which is to follow.

The ten themes identified early in the Direction of Travel document are welcome and give an indication of what the strategic priorities and ambitions are for the forthcoming Local Plan. It has only been two years since the adoption of Richmond's most recent Local Plan and since then there have been many new challenges, changing priorities and key shifts in the evolving planning landscape which Richmond intends to address. The Mayor welcomes Richmond's early thinking and work on a new Local Plan and recognises this is important to address housing delivery and ensuring the demand for other land uses can be met.

## **Housing**

The Mayor welcomes that Richmond recognises the borough's new housing target for the delivery of 4,110 new homes between 2019 and 2029, as set out in the Intend to Publish London Plan in Table 4.1. The Mayor would like Richmond to aim to exceed this target in line with his spatial strategy through greater delivery of housing from small sites to take account of the shortfall in meeting identified housing need across London. The borough's minimum small sites target for this period is 2,340 homes.

With regards to the delivery of small sites, the Panel Report specifically states that the small sites target in the London Plan can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect as required by paragraph 70 of the National Planning Policy Framework of 2019.

While Richmond's Local Plan needs to consider the National Planning Policy Framework 2019, the Planning Practice Guidance (Paragraph: 013 Reference ID: 2a-013-20190220) is clear that where a spatial development strategy has been prepared by the Mayor, it is for the relevant strategic policy-making authority to distribute the total housing requirement which is then arrived at across the plan area. Richmond's housing target is set out in the London Plan.

Beyond 2029, the Plan's proposed housing target should be based on a combination of the figures taken from the SHLAA 2017, local up-to-date evidence of identified capacity and the small sites target, which should be rolled forward in accordance with paragraph 4.1.12 of the Intend to Publish London Plan.

The Mayor welcomes Richmond's intention to undertake a Local Housing Needs Assessment but this would be based on the government's standard method. To be clear, Richmond should conduct a Strategic Housing Market Assessment in accordance with paragraph 4.10.5 of the Intend to Publish London Plan so that the borough has an understanding of housing needs in its area including tenures, housing for the elderly and the needs for different sizes of dwellings among others.

The Mayor is pleased that Richmond will consider the needs of Gypsies and Travellers in its housing need assessment. Richmond should note that the Mayor intends to lead a London-wide Gypsy and Traveller accommodation needs assessment. It should also note the Secretary of State's Direction on Intend to Publish London Plan Policy H14.

### **Affordable Housing**

The Mayor welcomes Richmond's intention to seek 50% affordable housing from residential development. However, the Mayor has set out a Threshold Approach to affordable housing delivery in Policy H5 of the Intend to Publish London Plan and this should be reflected in Richmond's emerging Local Plan. The Threshold Approach seeks to limit those circumstances where viability evidence is required as part of residential planning proposals by providing the incentive for developers to achieve at least the minimum level of affordable housing to qualify for the Fast Track Route thereby avoiding scrutiny of viability at various stages of development. The Regulation 18 version of the Local Plan should be drafted in line with this approach.

It is noted that the Inspector for Richmond's adopted Local Plan found that Richmond's Whole Plan Viability Assessment identified the potential for some sites in Richmond to realise proportions of affordable housing approaching 50%. Therefore, should Richmond wish to set a threshold higher than 35%, this should be evidenced through its viability evidence, including how the threshold will incentivise housing and affordable housing delivery.

### **Industrial and Employment Land**

The Mayor welcomes Richmond's intention to conduct an up to date Employment Land Review and carry out an industrial land audit to supplement its current evidence on employment land. Richmond should follow the Mayor's guidance set out in his [Practice note on industrial intensification and co-location through plan-led and masterplan approaches](#). Guidance is also set out in Policies E4 and E7 of the Intend to Publish London Plan and should be embedded in the draft Local Plan. Again, these policies are subject to Directions from the Secretary of State.

With regards to office development Richmond should take note of Policy E1 of the Intend to Publish London Plan, which directs new office development to the borough's town centres and regard should also be given to Table A1.1 which sets out the office guidelines identifying those town centres with the greatest potential to accommodate different types of office development. It identifies Richmond major town centre as having high commercial growth potential and suitable for both speculative and mixed-use office development while Twickenham is identified as having potential for mixed-use office development. East Sheen and Teddington are identified as having existing small office capacities which should be protected.

Richmond should clearly differentiate its approach towards industrial and office development.

### **Town Centres**

Much of Richmond's intended approach towards the borough's commercial centres and hubs is based on traditional ways of managing town centre development. Richmond should take into account the changing nature of retailing and consumer behaviour. There has been a general decline in retailing across London with high street operators losing market share to online traders. The impacts of these changes have been considerable and many high-street operators

are re-establishing themselves through new business models. To maintain vibrancy in London's town centres, the wide range of town centre uses identified in Intend to Publish London Plan SD6 should be considered acceptable in Richmond's town centres including office development, residential, social infrastructure, cultural uses and leisure uses.

Richmond's strategic approach to its town centres should take account of the town centre network guidance set out in Table A1.1 of the Intend to Publish London Plan which establishes individual centres' night-time economy classifications, commercial growth potential, residential growth potential and office guidelines classifications. In this regard, Twickenham and Teddington are identified as having important areas of night time economy which are of local significance and Richmond is a more substantial area of regional or sub-regional significance. This should be reflected in the approach taken in the forthcoming Local Plan.

### **Climate change**

The Mayor welcomes the elevation of the importance of tackling climate change across the borough, making it the very first key objective in the Direction of Travel document. This approach is in line with the Mayor's Good Growth Objective GG6 and his aim that London be a zero-carbon city by 2050. Further policies on addressing Climate Change can be found in Chapters 8 and 9 of the Intend to Publish London Plan.

### **Heritage**

Richmond's recognition of the importance of the Royal Botanical Gardens Kew as a World Heritage Site (WHS) is welcome and the WHS Site Management Plans should be used to inform Richmond's plan making process. Policy HC2 of the Intend to Publish London Plan should be noted and Richmond's Local Plan should require development proposals with potential to impact the WHS and its setting be accompanied by Heritage Impact Assessments.

Richmond should ensure that its strategic and local views are protected in accordance with Policy HC3 of the Intend to Publish London Plan. Table 7.1 of the Intend to Publish London Plan identifies the King Henry VIII's Mound to St Paul's Cathedral linear view as a protected vista and this should be preserved by ensuring that it is clearly illustrated on maps and the borough's policies map so that it can be identified by developers and officers to enable the effective management of development in and around the view. The view should be managed by following the principles of Policy HC4 of the Intend to Publish London Plan. The importance of 3-D modelling through images and/or software should be noted as a valuable tool in this regard.

### **Green Belt / Metropolitan Open Land (MOL)**

The borough is home to a substantial amount of MOL and to a lesser extent Green Belt. The Mayor is pleased that it is Richmond's intention to provide strong protection against inappropriate development in these areas in accordance with Policies G2 and G3 of the Intend to Publish London Plan. Please note the Secretary of State has issued Directions on Intend to Publish Policies G2 and G3.


## **Transport**

The Mayor is pleased that Richmond intends to apply the Intend to Publish London Plan residential parking standards, including those for areas with low public transport accessibility levels (PTALs). Richmond should also explore the potential for increasing levels of public transport, cycling infrastructure and promoting other forms of active travel such as walking in accordance with the Mayor's Healthy Streets Approach. Whilst the Mayor strongly supports Richmond's objectives on sustainable travel, it should be aware of the Secretary of State's Directions on the Intend to Publish car parking standards.

## **Building stronger communities**

The themes regarding new social and community infrastructure, creating safe, healthy and inclusive communities are closely aligned with the Mayor's Good Growth Objective GG1, Building strong and inclusive communities. The intended approach is welcome.

## **Next steps**

I hope these comments inform the preparation of Richmond's Local Plan. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact  [@london.gov.uk](mailto:richmond@london.gov.uk).

Yours sincerely



Debbie Jackson  
**Director – Built Environment**

Cc     Tony Arbour, London Assembly Constituency Member  
        Andrew Boff, Chair of London Assembly Planning Committee  
        National Planning Casework Unit, MHCLG  
        Lucinda Turner, TfL



TfL Ref: RMND/20/4

London Borough of Richmond

Email: [REDACTED]

**Transport for London**

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Phone 020 7222 5600  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

20/03/2020

Dear Sir/Madam,

**Re: Local Plan Direction of Travel**

*Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA).*

Thank you for giving Transport for London (TfL) the opportunity to comment on Richmond's Local Plan Direction of Travel document. Given the advanced stage of the draft London Plan in the adoption process – with the Intend to Publish version now available on the [GLA website](http://GLA website) – we will have regard to it when assessing and responding to local planning policy consultations, including Richmond's Local Plan Direction of Travel document. We also note that the Mayor has received direction from the Secretary of State and is currently considering his response.

We welcome the Council's commitment to addressing the climate emergency and housing crisis and its recognition of the importance of transport in achieving this, as well as tackling other health and environmental challenges. We strongly support the Council prioritisation of the needs of sustainable travel users, which will help to discourage the use of private vehicles and improve air quality. This will also help achieve the borough's ambition of making walking, cycling and public transport the modes of choice when travelling to and from new developments.

A key part in achieving this ambition will be restricting the provision of car parking in new developments. We would therefore strongly encourage the Council to require car-free and car-lite development as far as possible. We strongly welcome that the Council are considering adopting the London Plan residential standards across the



whole borough and encourage this option to be pursued. This will help minimise new development's contributions to the climate emergency, make it easier to tackle the housing crisis and reduce congestion on the road network and the borough grows.

Securing sufficient quantities of good-quality cycle parking will also enable more people to cycle. We welcome the commitment to the London Plan cycle parking standards and commend the Council for looking beyond this to investigate the potential for higher standards. We strongly support this approach in Richmond, given the proportion of existing journeys that could be cycled and considering that the borough has one of the highest cycle mode shares in London.

We welcome the Council's approach to securing developer contributions to the cycle networks within Richmond and note that the Council's Active Travel Strategy highlights areas that are less permeable by cycle. This is something that developer contributions could also potentially look to improve alongside strategic and local routes. We welcome the recognition of the importance of bus networks within the borough and will continue to work with the Council to understand how services and infrastructure can be improved, protected and funded.

We look forward to contributing further in the development of your Local Plan.

Yours faithfully,

**Policy Manager**

**London Plan and Planning Obligations team | City Planning**

Email: [\[REDACTED\]@tfl.gov.uk](mailto: [REDACTED]@tfl.gov.uk)



## Appendix A: Specific suggested edits and comments from TfL on Richmond's draft Transport Supplementary Planning document

Section	Page	Track change/comment
Introduction	4	<p>We greatly support Richmond's recognition of the climate emergency and the importance of transport infrastructure and active travel facilities/networks to support travel around existing and new communities.</p> <p>We therefore request that the anticipated date for the publication of the draft London Plan in March 2020 is removed/updated as appropriate, as this is unlikely to be met.</p>
Introduction - Our Place in London –	6	<p>We believe that the borough's main challenges include high levels of car ownership, congestion and the promotion of sustainable travel in less accessible parts of the borough. We also appreciate that the Council recognises that cross borough boundary issues, such as congestion and improving sustainable travel networks will need to be addressed by working with neighbouring boroughs and TfL.</p> <p>Richmond's new draft Local Plan should focus on how sustainable travel can be prioritised above private car travel, especially in areas where new developments are planned. Focusing car-free and car-lite development in well-connected parts of the borough supported by existing/planned sustainable transport infrastructure will ensure the best use of land within the borough and help reduce reliance on private vehicles. Policies that support the delivery of sufficient levels of high quality cycle parking should also be adopted in order to enable more people to cycle.</p> <p>We also believe that it is vital that Richmond continue to protect Green Belt and MOL from development. These areas also will not have the appropriate services and transport infrastructure to support new developments in line with Good Growth.</p>
Responding to the climate emergency	14	<p>We strongly support Richmond's declaration of a climate emergency in July 2019 and adoption of their Climate Emergency Strategy in 2020, which will help the Council overcome</p>

Section	Page	Track change/comment
		<p>environmental challenges faced by the borough. We also welcome the Council's commitment to become carbon neutral by 2030, which will help minimise the borough's contribution to climate change. Influencing transport behaviour will be key to achieving this and the Council should develop strategies to enable residents to be less car dependent and travel more on foot, cycle and public transport.</p>
<p><b>Shaping and supporting our town centre and local centres</b></p>	<p>26</p>	<p>We strongly support Richmond's policy to focus development in line with the town centre first principle, which is in line with the policies set out in the Intend to Publish version of the London Plan. We also would encourage the Council to build residential and mixed use developments in well-connected town, local and community centres. The Council should ensure that travel to/from and within their town centres by foot, cycle and public transport is as safe, convenient and attractive as possible. We would also encourage reducing the provision of car parking in town centres and would recommend that the Council look at opportunities to convert on-street parking bays to provide additional cycle parking.</p> <p>The approach to redevelop existing out-of-centre developments/retail parks should make sure that these are accessible by sustainable modes of transport so that they are not car dependent. Car and cycle parking provision should also be in line with the policy standards in the Intend to Publish London Plan and make sure that they are designed and located in a way which prioritises active travel choices.</p> <p>The borough has been identified in the draft London Plan as an area where higher cycle provision is required, both to cater for future growth and to reflect that around 7.5 per cent of trips arriving at workplace, leisure and shopping destinations are made by cycle, more than twice the average for inner London (see Appendix B). To support town centre and out of centre retail developments we would welcome clearer support for ensuring cycle parking quality, such as in relation to location, spacing and access.</p>



Section	Page	Track change/comment
<b>Green Infrastructure and protecting open land</b>	40	We would urge the Council to resist developing areas of the Green Belt and Metropolitan Open Land (MOL). In transport terms, these areas are generally more likely to have lower levels of connectivity by public transport i.e. PTAL 0-1 and lower levels of local amenities compared to developed areas that could potentially be intensified.
<b>Improving design</b>	45	We welcome the design-led approach to help provide high quality places and improved design and support the reference made to the ten characteristics of well-designed places as set out in National Design Guidance. We would welcome a public realm policy in the Richmond's local plan that supports the Healthy Streets Approach and the delivery of high quality public realm that enables inclusive active, inclusive travel.
<b>Promoting sustainable transport</b>	48	<p>We welcome the Council's commitment to addressing the climate emergency and the importance of improving transport and achieving the Mayor's modal shift target in achieving this. We are extremely supportive of the Council prioritising sustainable travel and its recognition of the importance of enhancing the bus, walk and cycling networks in particular as part of this.</p> <p>While we also acknowledge that there will likely be some trips that will continue to be made by car, it is important to view new development as a particular opportunity to embed the best possible approach to maximising sustainable travel. This in turn reduces the extent to which mode shift among residents/users of existing development is needed to meet Richmond's target, which could involve fewer opportunities than having ambitious planning policies in place. Embedding car-free and car-lite lifestyles in development schemes from the outset, as the Council suggests, is an excellent way of achieving this.</p> <p>We welcome the reference made to Crossrail 2, given the transformational effect the scheme could have on the borough. We note the Council's concern regarding ensuring connecting journeys to Crossrail 2 stations are made by public transport, walking and cycling. We strongly support this aim and are open to further discussion on the matter to understand and look to address these concerns.</p>

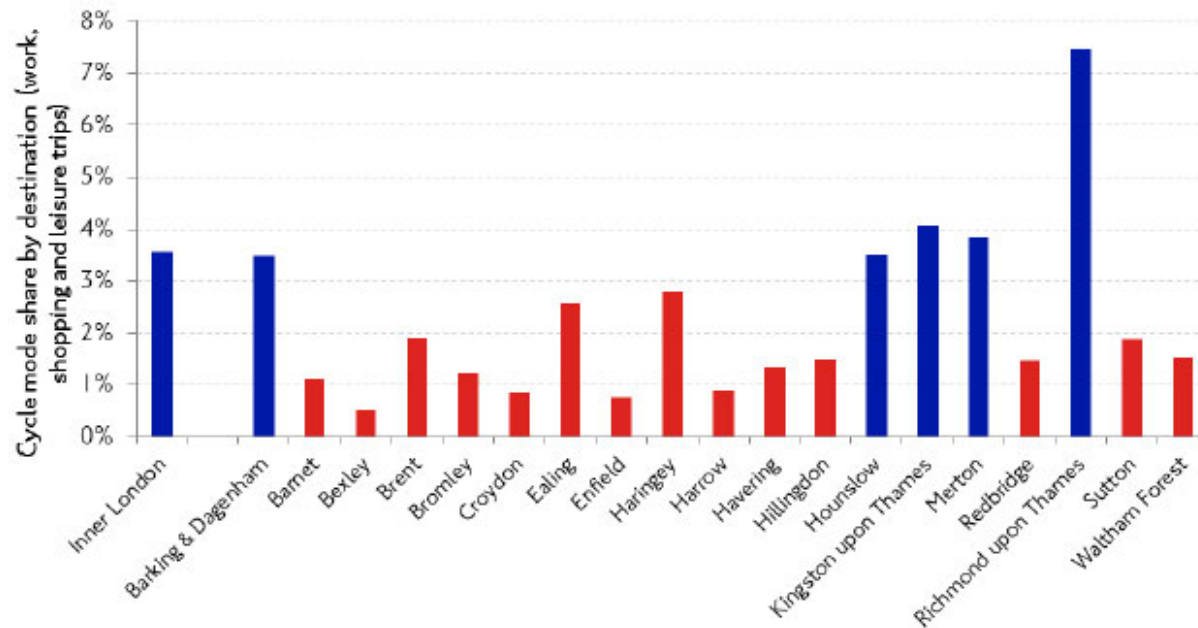
Section	Page	Track change/comment
<b>Buses</b>	49	<p>We welcome the recognition of the importance of bus networks within the borough. We will continue to work with the Council to understand how the existing routes, frequencies and access to bus stops/stations can be improved. To support this, we would welcome clear policies for protecting land/space for bus infrastructure, the expansion of bus priority and developer contributions towards enhanced services.</p>
<b>Hierarchy of street users/active travel</b>	50	<p>We welcome the intention of the hierarchy of street users. However, we would urge the Council to consider some additional nuance around the role of cycling and buses. The two modes need to be considered together to maximise sustainable mode share overall and the benefits each mode offers. In some areas buses play a key role in providing transport connectivity and this needs to be considered alongside expanding access to cycling. In particular, buses play a key role in making London accessible, both in terms of cost of travel and for people who are less able to walk long distances or use stairs and/or escalators at stations.</p> <p>We welcome the Council's recognition of both the current high levels of active travel in the borough and the potential to grow these further.</p>
<b>Car parking, town centre parking provision, cycle parking, cycling infrastructure and</b>	52	<p>We commend the Council for considering how to deliver less car-dependent development including through lower parking standards. We strongly encourage the Council to requiring car-free and car-lite development as far as possible, so as to best support the vision for sustainable transport it has set out. This will also help minimise new development's contributions to the climate emergency, make it easier to tackle the housing crisis and reduce congestion on the road network and the borough grows. We welcome that the Council are considering adopting the draft London Plan residential standards across the whole borough, and encourage this option to be pursued. We would also welcome discussion on whether we can better support the Council to achieve lower parking provision in new development, including in less well-connected areas.</p> <p>If parking standards above those set out in the draft London Plan are adopted, particularly in well-connected areas and in borough centres, the Council will risk undermining their ambitions</p>

Section	Page	Track change/comment
		<p>for ensuring ‘walking, cycling and public transport are the natural choice for trips to and from new developments’ and becoming carbon neutral by 2030. In light of the borough’s emphasis on the climate emergency, there is a considerable benefit to reducing emissions more quickly, such as through ambitious parking and mode shift policies, than relying on longer term emission reductions alone (e.g. full electrification of the vehicle fleet). It is therefore essential that car parking in new developments is kept to a minimum and is at least in line with the standards set out the draft London Plan.</p> <p>To support this approach, the Council could look into the expansion of Controlled Parking Zones (CPZs) as necessary. CPZ implementation can be funded by developers when secured as mitigation for their development and we would be happy to offer support such as by sharing best practice from other boroughs and elsewhere to help their implementation. While this may bring about change for some existing residents, this is a better solution than accepting lower housing delivery or higher congestion resulting from more off-street parking. The issue of parking permits can be capped or restricted to residents of new development – as practiced by other local authorities – to prevent additional parking stress on surrounding streets.</p> <p>We welcome that the Council is looking at the potential to reduce the number of parking spaces available in the borough’s centres, and encourage it to pursue this option. By doing so, the Council will better discourage car use where there are good alternatives and encourage walking, cycling and bus access to town centres, where there is considerable potential for mode shift.</p> <p>We strongly support Richmond’s adoption of cycle parking standards and welcome the Council’s plans to investigate adopting cycle parking standards higher than those in the London Plan to reflect local circumstances. We would also welcome specific policies in the borough’s new local Plan to provide policies to support the delivery of cycle parking quality, such as location, spacing and access, as detailed in Richmond’s draft Transport SPD.</p>

Section	Page	Track change/comment
		<p>We strongly support the Council’s approach to securing developer contributions to the cycle networks within Richmond as set out in the recent draft Transport SPD. The Council’s Active Travel Strategy highlights areas that are less permeable by cycle, and this is something that developer contributions could also look to improve alongside strategic and local routes.</p>
<b>Securing social and community infrastructure</b>	53	<p>We welcome references made to delivering the Healthy Streets Approach to support community cohesion and a growing population. We, especially welcome these references in the context of improving the public realm.</p>

## Appendix B: Destination-based cycle mode shares<sup>1</sup>

**Figure 4: Cycle mode share by destination for commute, shopping and leisure trips only, outer London boroughs compared to inner London**



Source: London Travel Demand Survey, 2012/13 to 2014/15

<sup>1</sup> [https://www.london.gov.uk/sites/default/files/london\\_plan\\_evidence\\_base\\_-\\_cycle\\_parking.pdf](https://www.london.gov.uk/sites/default/files/london_plan_evidence_base_-_cycle_parking.pdf)

# GREATER LONDON AUTHORITY

[REDACTED]  
Head of Policy and Place-Shaping  
Policy and Design  
London Borough of Richmond Upon Thames  
Civic Centre  
44 York Street  
Twickenham  
TW1 3BZ

**Department: Planning**

Your reference:

Our reference: LDF27/LDD12/LP02/JC01

Date: 31 January 2022

Email: [REDACTED]

Dear [REDACTED]

**Planning and Compulsory Purchase Act 2004 (as amended)**  
**Greater London Authority Acts 1999 and 2007**  
**Town and Country Planning (Local Development) (England) Regulations 2012**

**Re: Richmond Local Plan Regulation 18 'The best for our borough' Draft for consultation**

Thank you for consulting the Mayor of London on the London Borough of Richmond's Local Plan Regulation 18 Consultation Version. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) has provided comments, which I endorse, and are attached at Annex 1.

## **The London Plan**

This letter provides advice and sets out issues or approaches you should consider as the new London Borough of Richmond upon Thames Local Plan develops so that the final draft Local Plan is consistent with the London Plan 2021 (LP2021). The London Plan 2021 was formally published on the 2 March 2021, and now forms part of LB Richmond upon Thames' Development Plan.

## **General**

The Mayor recognises that Richmond's Local Plan consultation is now at the pre-publication stage of the borough's Local Plan preparation and that it has been informed by a Direction of Travel public consultation which was undertaken in Spring 2020. It sets out the strategic vision, objectives and spatial strategy, with place-based strategies and thematic policies and guidance to manage growth and guide development across the borough.

This letter provides an opportunity also to draw your attention to [the Mayor's pandemic recovery missions](#). There are nine missions in total, including high streets for all, enabling resilient communities and digital access for all, which may be useful in helping to develop the spatial strategy for Richmond further.

The Regulation 18 Local Plan sets a clear plan for growth and addresses many important policy areas such as responding to climate change and delivering new homes through incremental intensification in well-connected locations. However, the current approach to affordable housing in Policy 11 is likely to be an issue of general conformity and further detail on this is provided below.

### **Vision and objectives**

The Strategic Vision for growth 'The best for our borough' is informed by ten themes that have been developed since the Direction of Travel Consultation in 2020 and looks ahead over the next 15 years of the plan period to 2039 based on a 2024 adoption. The themes and objectives align well with the London Plan Good Growth policies including *Delivering new homes and an affordable borough for all* with policy GG4 Delivering the homes Londoners need and *Increasing jobs and helping business to grow* with policy GG5 Growing a good economy.

### **Spatial Strategy**

We welcome the overarching aim to direct new higher density development to sites in town centres or places that are well connected by public transport, walking and cycling to jobs, services, infrastructure and amenities. This aligns with London Plan Good Growth objective GG2 Making the best use of land and London Plan town centre policies SD6 and SD7.

We support the 20-minute neighbourhood and 'living locally' concept that underpins much of the plan. This aligns with the London Plan's Healthy Streets Approach to reducing car dominance and increasing walking, cycling and public transport use (Policy T2 LP2021) as well as London Plan Good Growth objectives GG1 and GG2.

Spatial Policy 2 is welcomed, particularly part B with regards to prioritising previously developed land and the support for refurbishment over demolition. This aligns with London Plan Policy D3 and the circular economy principles of minimising the use of new materials. The reference to the London Plan's Good Growth objectives in paragraph 4.17 is welcomed and supported.

### **Climate change**

The Mayor welcomes the elevation of the importance of tackling climate change across the borough within Richmond's Plan. The Mayor has set an ambitious aim for London to be a

zero carbon city by 2030 and you may want to reflect this in the strategic climate emergency policy.

With regards to the ambitious targets in set out in Policy 4 that seek a higher level of on-site reduction in carbon (60%) and a higher offset rate of £300/t compared with Policy SI 2 LP2021, it will be important to ensure that these are deliverable and that housing targets and other requirements of the plan can still be achieved. Policy DF1 LP2021 applies priority to affordable housing and necessary public transport improvements when setting policies seeking planning obligations in Local Plans. Policy 4 should be reviewed once the Whole Plan Viability evidence, has been produced.

The Mayor welcomes the requirement in Policy 7 for Whole Life-Cycle Carbon Assessments. These should be carried out in accordance with the Mayor's [Whole Life-Cycle Carbon Assessments guidance](#) and that should be referenced within the supporting text.

For clarity, the supporting text to Policy 4 in paragraph 16.8 should read 'at least five years' rather than 'over a period of 4 years' as per the Mayor's [BeSeen energy monitoring guidance](#).

## **Waste**

London Plan Policy SI 8 Part B3 requires boroughs to allocate sufficient land (sites and/or areas) and identify waste management facilities to provide the capacity to manage their apportioned tonnages of waste. Where apportionments are pooled, boroughs must demonstrate how their joint apportionment targets will be met, for example through joint waste Development Plan Documents.

We welcome Policy 7 that seeks to safeguard Richmond's existing waste sites and that the policies of the West London Waste Plan 2015 and London Plan will be used to assess proposals affecting existing waste management sites or for additional waste management facilities. We note that the WLWP is due for review in 2031 and it should be made clear within the Plan that the waste apportionment over the lifetime of the plan will be accounted for.

## **Housing**

The Council's commitment in Policy 10 to exceed the borough's ten year London Plan housing monitoring target of 4,110 homes through the optimisation of all suitable and available brownfield sites is welcomed and we are pleased to note that housing delivery against the borough target is capable of being met without the release of employment land.

We note confirmation within the Plan that the housing target can be rolled forward for future years, however this will need to be carried out in accordance with paragraph 4.1.11 from the LP2021.



We welcome Richmond's intention to seek 50% affordable housing from residential development. However, the Mayor has set out a Threshold Approach to affordable housing delivery in Policy H5 LP2021, which is not reflected in the plan. This is likely to constitute a General Conformity Issue.

The Threshold Approach seeks to limit those circumstances where viability evidence is required as part of residential planning proposals by providing the incentive for developers to achieve at least the minimum level of affordable housing to qualify for the Fast Track Route thereby avoiding scrutiny of viability at various stages of development. This should be reflected in Richmond's strategic affordable housing policy.

Affordable housing data from London Plan AMR shows Richmond as having an average of 14% completions over the three years 2016/17 to 2018/19 and -3% for approvals in 2018/19 (although this rises to 0% when counted by number of bedrooms). Therefore, the Mayor cannot currently support Richmond's approach to affordable housing contributions, particularly when this is not supported by viability evidence or historical delivery rates.

We welcome the commitment in Policy 16 to support the delivery of Richmond's small sites target of 234 new homes per annum and the incremental intensification of well-connected residential areas (PTAL 3-6 or within 800m of a station) in accordance with the LP2021.

We support Policy 12 that seeks to assess applications for older person's housing in accordance with London Plan Policy H13. However, we note that the policy refers to identified local need as set out in the Council's Local Housing Needs Assessment. This currently appears to be lower than the London Plan annual benchmark for older persons housing set out in Table 4.3 of 155 units for Richmond. We would welcome further review of this figure to bring it closer in line with the London Plan benchmark.

### **Gypsy and Traveller accommodation**

Richmond's own research on Gypsies and Travellers in 2013 and 2015 (report published in 2016) suggested that there is no demonstrated need for additional pitches, however the 10-year pitch requirement needs to be set out once the research is updated in 2022 and this should take Policy H14 LP2021 into account.

We welcome the reference to the Mayor's future London-wide Gypsy and Traveller accommodation needs assessment.

### **Town centres**

Policy SD6 LP2021 seeks to promote the vitality and viability of London's town centres. We note and support the approach to use the existing stock of vacant properties in Richmond's centres to meet the need identified in the RLNS 2021. The approach towards diversifying and

repurposing high streets and centres for a wider range of uses is supported and we note that this will help to facilitate Richmond's strategic policy Living Locally and the 20-minute neighbourhood.

Policy D13 LP2021 details the Agent of Change principles and we note that Policy 19 aligns with this approach, placing the responsibility of mitigating the impact of late night uses onto the proposed residential use. A reference to Policy D13 would be welcomed here.

### **Industrial and Employment Land**

We acknowledge that the Employment Land and Needs Assessment 2021 identifies a need to accommodate growth of 60,000sqm/15ha (100 industrial jobs) per annum but recognises few options to address this deficit. The approach to protecting existing industrial land in Policy 24 will help to protect existing floorspace and potentially provide a net increase through redevelopment and intensification as supported by Policy E7 LP2021.

Policy 23 seeks to protect office floorspace and direct major new office development into the five town centres and smaller scale office development to Key Business Areas. E1 LP2021 supports the focus of new office development in town centres however, the Key Business Areas should be supported by improvements to walking, cycling and public transport connectivity and capacity.

We note that Richmond identifies creative industries as an area of specialisation for the borough's economy which is characterised by a large proportion of micro-business units and that there is a limited availability of stock of affordable, flexible 'studio workroom' units and ground floor light industrial and larger industrial units. Policy 25 seeks to protect existing affordable workspace and requires the provision of new in accordance with Policy E3 LP2021. This is welcomed, although Richmond should ensure that this is supported by local evidence in accordance with E3 Part C and in the circumstances outlined in Part B.

### **Heritage**

We welcome Policy 32 which recognises the Royal Botanical Gardens Kew as a World Heritage Site (WHS), in line with HC2 LP2021. A requirement for development proposals with the potential to affect the WHS or its setting to be supported by Heritage Impact Assessments should be within the Policy rather than supporting text.

We note that Richmond intends to identify its views and vistas on the Policies Map. Table 7.1 of the LP2021 identifies the King Henry VIII's Mound to St Paul's Cathedral linear view as a protected vista. The view should be managed by following the principles of Policy HC4 LP2021 and this should be noted in the supporting policy text. We welcome the recognition of the importance computer-generated imagery (CGI) and 3D modelling in Policy 31 and paragraph 20.44.

## **Green Belt / Metropolitan Open Land (MOL)/Public open space**

We are pleased to note the strong protection of the Green Belt in accordance with policies G2 and G3 LP2021 and that you are following recommendations of the Open Land Review 2021 that recommended all designated Green Belt for retention.

With regards to MOL we note that the study identified the majority of MOL as performing strongly but with some specific areas scoring weakly against MOL criteria including the Sainsburys car park, Hampton site that you are proposing for release and allocation for 100% affordable housing along with restoration and enhancement of the wildlife corridor. I note that you are also proposing to release two sites that comprise of front gardens.

Any alterations to the boundary of MOL should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B of Policy G3 LP2021.

None of the three sites appear to meet the criteria for inclusion as MOL and therefore the Mayor raises no objection at this stage to the proposed release of these sites, subject to detailed justification being provided in the supporting evidence.

We support the references to children and young people's play facilities in policy 37 and are pleased to note the reference to the GLA's child yield calculator, the LP2021 benchmark of 10 sqm per child and the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG. The supporting text in paragraph 21.27 sets clear criteria for the loss of facilities and perhaps should be embedded within the policy.

Policy S4 LP2021 notes the importance of informal recreation and paragraph 5.4.2 highlights the current lack of opportunities for children to play in their local neighbourhood. A recognition of informal play as well as formal play spaces within Richmond's policies would be welcome. This is also connected to the Healthy Streets Approach.

## **Transport**

Transport for London (TfL) has provided detailed comments, attached below at Annex 1.

We are pleased to note the intention to adopt London Plan parking standards in Policy 48 and the encouragement of car free development in accordance with Policy T6 LP2021. We would also expect to see this approach reflected in the Site Allocations.


We welcome the references to Active Travel throughout the Plan and in strategic transport Policy 47 as well as the intention to safeguard land required for transport schemes set out in the London Plan. This safeguarding should be extended to existing transport infrastructure as well as future schemes in accordance with Policy T3 LP2021.

It will be important to ensure that the transport chapter identifies the need to secure land for transport and outlines future plans and proposals in line with Policy T3 of the LP2021 and the emerging [Sustainable Transport, Walking and Cycling London Plan Guidance](#) (LPG). The Plan should identify walking and cycling networks and any gaps or potential improvements, as advised in the LPG.

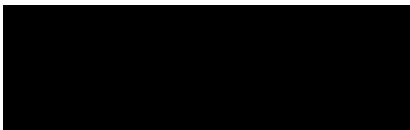
### **Creating safe, healthy and inclusive communities**

The policy approaches towards creating safe, healthy and inclusive communities are closely aligned with the Mayor's Good Growth Objective GG1, Building strong and inclusive communities.

### **Next steps**

I hope these comments inform the preparation of Richmond's Local Plan. We would like to offer you an officer level meeting to discuss the general conformity issue with regards to affordable housing further and will be in touch shortly. In the meantime, if you have any specific questions regarding the comments in this letter, please do not hesitate to contact  [@london.gov.uk](mailto: [redacted]@london.gov.uk).

Yours sincerely



Lucinda Turner

**Assistant Director of Planning**

Cc: Nicholas Rogers, London Assembly Constituency Member  
Andrew Boff, Chair of London Assembly Planning Committee  
National Planning Casework Unit, MHCLG

**Transport for London**

City Planning  
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Phone 020 7222 5600  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

31 January 2022

Dear Sir/Madam,

**Re: Richmond Regulation 18 draft local plan**

*Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Commercial Development to reflect TfL's interests as a landowner and potential developer.*

Thank you for giving Transport for London (TfL) the opportunity to comment on Richmond's draft local plan. As you are aware, the London Plan 2021 was published in March 2021 and now forms part of Richmond's development plan.

We strongly welcome your aspirations to implement the 20 minute neighbourhood concept, reduce the need to travel and improve the choices for more sustainable travel. In particular, we welcome the ambitions set out in the draft local plan to: decrease car use and achieve mode split targets and implement the Healthy Streets Approach. It would be helpful if reference could also be made to achieving the Mayor's Vision Zero ambition for road safety. We are pleased to see the plan's recognition of the importance of active travel and public transport.

We commend you for adopting London Plan parking standards and the encouragement of car free development. However, this positive approach is not always reflected in site allocations and some of the accompanying text which refers to car parking requirements or needs. We would welcome a more consistent approach to encouraging car free development wherever possible, including the redevelopment of existing car parking and minimising the amount of parking elsewhere.

We welcome your intention to seek contributions towards active travel improvements and enhanced public transport capacity and infrastructure. We also welcome the safeguarding of transport land, although this should be extended to existing transport infrastructure as well as future schemes.

As part of the evidence base to support the Local Plan we recommend that you consider the potential need for a borough-wide strategic transport assessment which would look at the cumulative impact of major site allocations and the expected background growth in travel. This would help to address concerns that may be expressed about the deliverability of Local Plan proposals and would be useful when considering the transport impacts of major sites when they come forward for development. TfL has a number of modelling and assessment tools that could be made available to consultants carrying out the assessment work on your behalf.

Our responses to specific points in the draft local plan are set out in more detail in the attached appendix. We look forward to continuing to work together in drafting the final document and are committed to continuing to work closely with the GLA to deliver integrated planning and make the case for continued investment in transport capacity and connectivity to enable Good Growth in Richmond and across London.

Yours faithfully,

**[REDACTED] | Manager**

**London Plan and Planning Obligations team | City Planning**

Email: **[REDACTED]** [@tfl.gov.uk](mailto:[REDACTED]@tfl.gov.uk)



## Appendix: Specific suggested edits and comments from TfL on the Richmond Reg. 18 draft local plan

Section	Track change/comment
Site Allocation 1: Hampton Square Hampton	The requirement to retain adequate car parking to meet the needs of the community centre and new uses should be modified by stating that car parking should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards.
Site Allocation 5: Car park for Sainsburys, Uxbridge Road, Hampton	<p>Bus services in both directions serve a bus stop on this site that is alongside the existing store. The site allocation should make it clear that the bus stop must be retained in any redevelopment.</p> <p>The statement that parking is expected to be re-provided for the adjacent food store should be modified by stating that car parking should be minimised as part of any redevelopment consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards. London Plan Policy T6 states that <i>'Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London'</i>.</p> <p>We note that the existing petrol filling station is expected to be retained or re-provided. London Plan Policy T6 states that <i>'New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities'</i>.</p>
Site Allocation 12: The Stoop Twickenham	The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.
Site Allocation 13: Twickenham Stadium, Twickenham	The allocation states that there is a need to retain sufficient parking, particularly for coaches. This should be rephrased to make it clear that although coach parking should be provided, car parking for employees or spectators should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance. The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.

Section	Track change/comment
Site Allocation 15: Station Yard, Twickenham	We welcome the reference to bus stands. However, the requirement that bus stands should be retained, redeveloped or re-sited in a suitable location needs to be clarified. If bus stands are redeveloped or re-provided this should only be with the agreement of TfL and standing capacity (as well as drivers' facilities) must be maintained and enhanced.
Site Allocation 18: Twickenham Riverside and Water Lane/ King Street	We welcome the suggestion that <i>'There should be a comprehensive approach to servicing and delivery, along with exploring the opportunity to improve the environment of the Embankment through a reduction in car parking.'</i> This could be more directly worded to state that any redevelopment would be expected to remove car parking on the Embankment.
Site Allocation 24: Richmond Station, Richmond	We welcome the stated aim of a comprehensive approach including transport interchange improvements. We would expect to be closely involved in both the development of the SPD and early discussions about potential redevelopment plans. It would be helpful to make this expectation clear in the site allocation.
Site Allocation 28: Homebase, Manor Road, East Sheen	We welcome the requirement for the retention of the existing bus terminus. It would be helpful to clarify that this comprises both bus standing and drivers' facilities, and that they should be retained and enhanced in any redevelopment in consultation with TfL. The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.
Site Allocation 29: Sainsbury's, Lower Richmond Road, Richmond	The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.
Site Allocation 30: Kew Retail Park, Bessant Drive, Kew	The site is adjacent to the Transport for London Road Network (TLRN). We therefore welcome the statement that <i>'The applicant is strongly advised to seek pre-application transport and highway safety advice from Borough and TfL Officers before writing their transport assessment.'</i>
Place Based Strategy for Mortlake and East Sheen Other Initiatives	We note the reference to a potential cycle route between Mortlake and East Sheen in TfL's Cycling Action Plan. This is indicative and more work will be required to determine the actual alignment of any cycle route.



Section	Track change/comment
Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	<p>We note the statement that <i>'The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where necessary improvements to sustainable modes of travel, including public transport facilities, are secured as part of any development proposal. The opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site should be investigated as part of the comprehensive redevelopment.'</i></p> <p>Although we support the requirement for bus standing space within the development site, TfL does not support the closure of Avondale Road Bus station. The proposed bus standing within the Stag Brewery site should be regarded as additional to, and independent of, the bus stops and turning facility at Avondale Road.</p>
Policy 15. Infill and Backland Development	<p>In A2, we welcome encouraging the redevelopment of car park sites to provide housing, although it should be noted that in policy H1 of the London Plan there is no need to demonstrate that the parking is no longer needed. This is because parking is known to induce car travel so demand for it should not be described as arising from 'need'. As such, reductions in parking can deliver mode shift and reduce the dominance of vehicles in an area. To ensure consistency, this requirement should be deleted.</p>
Policy 47. Sustainable Travel Choices	<p>We support the potential requirement in part B to provide financial contributions towards increased capacity or improved infrastructure. However public transport capacity constraints may also apply in higher PTALs and so the wording should make it clearer that there is a potential requirement for contributions to public transport in all areas, regardless of PTAL. The level and type of mitigation will be informed by a multi-modal impact assessment.</p> <p>Part C could refer to implementing measures that are identified through an Active Travel Zone (ATZ) Assessment in line with the Healthy Streets Approach</p> <p>Part H should refer to safeguarding existing transport infrastructure in addition to safeguarding transport schemes.</p>
23.1	<p>We strongly welcome the borough's commitment to promoting sustainable travel, decreasing car use, and improving air quality. However, the commitment to decreasing car use could be made more prominent by referring to it in policies. As stated, <i>'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.'</i> We also welcome confirmation that Local Plan policies should be read alongside those in the London Plan and the Mayor of London's Transport Strategy.</p>
23.2	<p>When referring to the Council's sustainable transport mode split targets, it is helpful to clarify that developments will need to demonstrate how they are contributing to achievement of those targets.</p>

Section	Track change/comment
23.10	When referring to London Plan minimum standards for cycle parking, it is helpful to add that developments that exceed minimum cycle parking provision will be encouraged.
23.21	We welcome safeguarding of bus garage facilities, but it should be made clear that in all cases TfL agreement will be needed to confirm that any replacement facilities are fit for purpose and capable of being delivered, or that existing facilities are surplus to requirements. This will take into account the need for additional space to accommodate alternative fuel facilities.
Policy 48. Vehicular Parking standards, Cycle Parking, Servicing and Construction Logistics Management	<p>We strongly support the requirement to provide cycle and vehicle parking in line with London Plan policies and standards, including reference to London Cycling Design Standards. Where parking is provided, a Parking Design and Management Plan should be submitted with the application.</p> <p>In part F we welcome the encouragement of car free developments in PTAL 3 or above.</p> <p>In F5, where CPZs are not already in place it would be appropriate to encourage developments to provide funding towards implementation of a new or extended CPZ (or equivalent parking controls).</p> <p>In F8, it may not be appropriate to require car club spaces to be provided in developments in areas of very good connectivity where alternatives to car use can provide for all travel needs.</p> <p>In part G, there may be a need to consider on street disabled persons' parking spaces on constrained sites that are otherwise suitable for car free development. We can provide advice on how this works in other boroughs if helpful.</p> <p>In part H, where there is physically no possibility of accommodating short stay cycle parking on site, on street provision may need to be considered as set out in paragraph 23.35.</p> <p>In part I, it may not be appropriate to require car club spaces to be provided in developments in areas of very good connectivity where alternatives to car use can provide for all travel needs.</p> <p>In part L, it is helpful to refer to TfL guidance on Delivery and Servicing Plans.</p> <p>In part M, to ensure consistency with London Plan and TfL, it would be helpful to refer to Construction Logistics Plans rather than Construction Traffic Management Plans.</p>

[REDACTED]

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**From:** Richmond Local Plan [REDACTED]  
**Sent:** 12 January 2022 13:10  
**To:** [REDACTED]  
**Subject:** RE: Richmond draft Local Plan - Duty to Cooperate (GLA & TfL)  
**Attachments:** GLA and TfL January 2022.docx; Richmond Retail and Leisure Needs Assessment - Proposed Methodology May 2021.pdf

[[https://richmond.gov.uk/media/22987/retail\\_and\\_leisure\\_needs\\_study\\_phase\\_1.pdf](https://richmond.gov.uk/media/22987/retail_and_leisure_needs_study_phase_1.pdf)]

Official

Many thanks for those that have got back to me so far.

I'm going to suggest we meet Thursday 20th 10:30 to 12, and we will send out an appointment in the next day or so. I was suggesting a combined GLA and TfL meeting as some of the discussions will be related – we can structure the agenda accordingly if that allows some to leave earlier. I can also see if one of our transport planners may be able to attend. Alternatively I'm happy to have separate meetings if that is easier.

Further to my email in December, we have now put together a more detailed update on the progress of the Draft Local Plan, including where we are with various parts of the evidence base, and the emerging policy direction in key areas, as set out in the attached. Thank you also for the detailed Direction of Travel responses that we received in 2020 from the Mayor of London, TfL, and TfL (Commercial Development), which we have used to inform this.

Hopefully the attached can inform discussion, in particular to address general conformity with the London Plan. We can put together a brief agenda prior to the meeting, together with anything you wish to raise.

And just to put into context for next steps - following this consultation which ends on 31 January 2022, we are anticipating the public consultation on the final draft Publication version will be late 2022. We will later in 2022 be looking to document Duty to Cooperate discussions in a Statement of Common Ground.

Many thanks,

[REDACTED] (Richmond)

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**From:** [REDACTED]@london.gov.uk>  
**Sent:** 22 December 2021 14:42  
**To:** [REDACTED] Richmond Local Plan  
<RichmondLocalPlan@richmondandwandsworth.gov.uk>  
**Cc:** [REDACTED]

**Subject:** RE: Richmond draft Local Plan - Duty to Cooperate (GLA & TfL)

Please could you also invite from the GLA [REDACTED] who will be joining the team – and if we could avoid Monday and Fridays for the meeting that would be appreciated.

Many thanks

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**From:** [REDACTED]@tfl.gov.uk>  
**Sent:** 22 December 2021 10:48  
**To:** [richmondlocalplan@richmondandwandsworth.gov.uk](mailto:richmondlocalplan@richmondandwandsworth.gov.uk)  
**Cc:** Londonplan [REDACTED]

**Subject:** FW: Richmond draft Local Plan - Duty to Cooperate (GLA & TfL)

Dear [REDACTED]

Many thanks for getting on touch regarding a potential Duty to Cooperate meeting. From TfL I would act as the main contact and attendee because I will be preparing the Local Plan response. Sarah Hoad may also wish to attend as the Richmond area planning team lead

If the meeting could be arranged for a time between 10:00 – 12:00 or 15:00 – 17:00 that would help in terms of my availability. At this point most dates in the given weeks are free apart from 21 January

All the best

[REDACTED]  
[REDACTED] I Principal Planner (Spatial Planning)  
TfL Planning, Transport for London

A: 9<sup>th</sup> Floor, 5 Endeavour Square, E20, Westfield Avenue, E20 1JN

[REDACTED]  
We have recently made changes to our pre-application service and charges, and introduced a new Initial Screening process. For more information please visit: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

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**From:** Spatial Planning [REDACTED]  
**Sent:** 22 December 2021 10:36  
**To:** [REDACTED] <[\[REDACTED\]@tfl.gov.uk](mailto:[REDACTED]@tfl.gov.uk)>  
**Subject:** FW: Richmond draft Local Plan - Duty to Cooperate (GLA & TfL)

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**From:** Richmond Local Plan [REDACTED]  
**Sent:** 21 December 2021 18:04  
**To:** [REDACTED] Spatial Planning [REDACTED]  
**Subject:** Richmond draft Local Plan - Duty to Cooperate (GLA & TfL)

Official

Dear GLA & TfL colleagues,

We are now consulting on the first draft of the Richmond Local Plan ('Pre-Publication' / Regulation 18 consultation), for which you should have received a notification email/letter on the 10 December (or any subsequent forwards). The consultation is open until 31 January 2022 and we look forward to receiving your response. We just wanted to flag up at this stage that we will be in contact with you early in the New Year to enable some targeted discussions, as we are keen to have input from our Duty to Cooperate bodies, including the GLA and TfL, as well as other key stakeholders. We will provide you in early January with a more detailed update on progress on the Draft Local Plan, including where we are with various parts of the evidence base, and the emerging policy direction in key areas. This will be informed by previous discussions during the preparation of the currently adopted Local Plan, which may form a starting point for identifying the strategic, cross-boundary issues for discussion.

At that point we would also be keen to organise a Duty to Cooperate virtual meeting (using MS Teams), for which we can prepare a detailed agenda. We would be looking to find a suitable time towards the end of w/c 10<sup>th</sup> January, w/c 17<sup>th</sup> January, or w/c 24<sup>th</sup> January while the consultation remains open. If you could indicate which officers may wish to attend and any suitable times for you, then we can organise early in the New Year.

I look forward to hearing from you and will be in touch again early in the New Year.

Many thanks,

[REDACTED]  
[REDACTED] (Richmond)  
Serving Richmond and Wandsworth Councils  
[REDACTED] <[\[REDACTED\]@richmondandwandsworth.gov.uk](mailto:[REDACTED]@richmondandwandsworth.gov.uk)> | [www.richmond.gov.uk](http://www.richmond.gov.uk) | [www.wandsworth.gov.uk](http://www.wandsworth.gov.uk)



## Richmond draft Local Plan - Duty to Cooperate (GLA & TfL)

### Supporting documents and evidence base:

A number of these may be relevant to our discussions.

The [Draft Plan](#) is accompanied by a [Sustainability Appraisal](#), [Equality Impact and Needs Analysis \(EINA\)](#), [Habitats Regulation Assessment \(HRA\)](#), [Health Impact Assessment \(HIA\)](#), and [Flood Risk and Development Sequential Test](#).

We have progressed a number of evidence base studies to inform the draft Plan - [Urban Design Study 2021](#), [Open Land Review \(Green Belt, MOL, LGS and OOLTI\) 2021](#), [Local Housing Needs Assessment 2021 \(stage 1\)](#), [Employment Land & Premises Needs Assessment 2021](#), [Retail & Leisure Needs Study 2021 \(phase 1\)](#), [Strategic Flood Risk Assessment \(2020\)](#), [Nature Conservation Review \(2021\)](#). There is further work to be undertaken from early 2022, including the further evidence base phases (on retail and housing needs), and additional studies including an Indoor Sports Facility Needs Assessment/Playing Pitch Assessment/Playing Pitch Strategy Update, Infrastructure Delivery Plan / Statement, and Whole Plan Viability Assessment.

### Approach in the Draft Plan:

The overarching spatial strategy is largely updated from the adopted Local Plan, with a new focus putting at the heart of the Plan the concept of a 20 minute neighbourhood. This concept has resonated with our residents, particularly where the COVID-19 pandemic has highlighted the benefits of living locally and having facilities locally, and responding to the challenges of climate change. This is largely set out in Policies 1 and 2. Page 29 in the draft Plan sets out the limited options for alternatives to the spatial strategy, given the borough's constraints which prevent us meeting the objectively assessed housing and employment needs. The draft Local Plan does include in sections 5 to 14 place-based strategies for nine high-level places across all of the borough, set out with the accompanying site allocations for that place. There are then policies based around ten themes.

In terms of **site allocations**, many have been rolled forward from the adopted Local Plan and the Twickenham Area Action Plan. (There is also a [schedule of sites not being taken forward as Site Allocations](#)). Some of the existing site allocations have been updated - including Kneller Hall. (The Ministry of Defence has disposed of the site and it is now owned by Dukes Education who will be bringing the site forward as a new upper school for Radnor House (who will retain their existing site in Cross Deep in Twickenham, expanding to create a junior school)). There are 8 new site allocations added, which could be key in meeting future needs if they are brought forward for development:

- Car park for Sainsbury's, Uxbridge Road, Hampton – proposed for MOL release for 100% on-site affordable housing (referred to below under Natural Environment).
- Teddington Police Station – proposed for community/social infrastructure-led mixed use development with residential. The site is subject to disposal by MOPAC. Colleagues in Development Management have already been in discussion to make existing policy requirements clear as part of the marketing.
- Whitton Community Centre – proposed for reprovision of community facilities with affordable housing. This is a Council owned site.
- Former House of Fraser, Richmond – proposed for retail, office/workspace, and leisure/community use, with active ground floor frontages. This does reflect an extant permission; it is included given it is a key site in the heart of the town centre.
- Richmond Telephone Exchange – proposed for residential. A number of other Telephone Exchanges were included in the adopted Local Plan. Although we do not know if they will come forward, there has been some indication that Openreach (BT) were consulting on closing some exchanges by 2030 (with a move away from copper-based broadband lines to a fibre-to-the-premises future) which included Richmond.

- American University – proposed for education-led use as priority, followed by community use. The University is relocating the campus to Hounslow from September 2022.
- Homebase, East Sheen – proposed for residential-led redevelopment, including high quality public realm. This is reflective of the current planning application in terms of land use, which is the subject of Mayoral call-in (Ref: GLA/4795/03). The proposal includes buildings up to 11 storeys, and although the Urban Design Study recommends a tall building zone with a mid rise buffer, the appropriate heights for the zone are considered up to 8 storeys to respect the small scale of the surrounding area.
- Kew Retail Park – proposed for a residential-led mixed use development. Half the site has been purchased by Berkeley Homes. There is no protection of retail uses due to it's out of centre location, although there is an opportunity to provide a range of commercial uses (retail, offices, affordable workspace, leisure) to serve the locality, and improvements to the public realm, active transport and links to the River, with the Urban Design Study identifying the East Kew Mixed Use Area as an opportunity to transform the character. This is a significantly sized site in terms of potential future delivery. The requirement for a full transport assessment is noted, including advice to seek preapplication transport and highway safety advice from Borough and TfL Officers.

In regard to sites within TfL ownership, Twickenham Bus Stand forms part of updated Site Allocation 15. There is no site allocation proposed for Fulwell Bus Garage, given the garage remains operational and there have been no details of a proposed scheme bringing forward as a comprehensive wider site.

If you are familiar with the adopted Local Plan, you may find helpful [a summary of the place-based strategies with site allocations and policies](#) which sets out some of the main changes when compared to the adopted Local Plan.

#### **Strategic, cross-boundary issues:**

We have given some thought to the strategic policy areas (as set out in paragraph 20 of the NPPF 2021), informed by previous discussions during the preparation of the currently adopted Local Plan (see the [Duty to Co-operate Statement May 2017](#) submitted for Examination) although there is a need to consider the current position.

#### ***Housing:***

This will continue to be a strategic issue for continued liaison.

The [Local Housing Needs Assessment](#) (LHNA) 2021 by Iceni considers demographic trends and a scenario to understand the potential population growth associated with the delivery of 411 homes per annum. A stage 2 update of the LHNA will be undertaken in 2022 to take into account the latest information (including the medium to longer-term impact of the COVID-19 pandemic on the housing market) and to assist in prioritising local housing needs.

Meeting the higher housing target in the London Plan 2021 will be a challenge, given the constraints in the borough and meeting other plan priorities. The draft Local Plan policies on housing have been updated to reflect the London Plan, particularly with emphasis on site optimisation and density, with Policy 14 expecting replacement housing at existing or higher densities, a balanced approach to protecting garden land in Policy 15 with a focus on assessing the harm of proposals, and Policy 16 to highlight the importance of small sites intensification. These are linked to the Urban Design Study and the boroughwide assessment of character, and the approach to tall and mid-rise zones, as detailed below under the Historic Environment.

In line with the London Plan 2021 at paragraph 4.1.10, the draft Plan at paragraph 17.4 sets out that a stepped housing delivery target over a ten-year period is considered relevant to the borough given the considerable increase expected in small sites delivery whereby there will be a time lag for the change in the policy context towards incremental intensification to result in proposals coming forward, and given some identified large sites are expected to deliver in years five to ten (e.g. Kew Retail Park is not yet included in the trajectory for years one to five).

On affordable housing, the LHNA estimates a net annual need of 1,123 affordable rented and 552 home ownership products to be provided between 2021-2039, and therefore this remains the highest priority. Policy 11 reflects the London Plan in terms of tenure split, although sets out that First Homes and a fast-track viability threshold approach are not appropriate in the borough context, because of the significant affordable housing need and as the borough has such a limited supply of large sites. Policy 51 also includes a new criterion which allows for a change of use from former social infrastructure use to wholly affordable housing without the need to explore and market for alternative social infrastructure use. Note that a Whole Plan Viability assessment will be commissioned in early 2022.

The LHNA also incorporates [Housing LIN analysis](#) which is a localised assessment of need for specialised housing and accommodation for older persons. It does suggest up to 50% of the estimated need could be met through the provision of mainstream housing, as it may be possible through minor layout changes or improvements, or enabling works such as ground floor extensions, to enable people to stay in their own homes. It suggests (to 2030) a net need (for housing for older people and housing with care) of c.75 units per year. Policy 12 is focused on meeting the housing needs of different groups reflecting priority local needs, seeking future control in terms of eligibility and affordability for future occupiers, and making it clear all residential uses are expected to contribute to affordable housing needs.

#### ***Gypsies and Travellers:***

Although not identified previously as a strategic issue, we are intending to update in 2022 the Council's previous [research](#) from 2016, which will also acknowledge some recent unauthorised encampments.

#### ***Employment:***

Although not identified previously as a strategic issue, there has been a similar approach towards protecting employment land. The borough [Employment Land & Premises Needs Assessment 2021](#) by Stantec advises the Local Plan should seek to accommodate growth of 100 industrial jobs per annum / 60,000 sqm / 15 ha industrial land, but recognises there are few options to address this deficit. For office floorspace there is a shortfall of approximately 73,000sqm (the draft Plan contains an error stating this as over 100,000 sqm and will be updated in due course) and for future need it advises the Local Plan should seek to accommodate an additional minimum of 130 jobs per annum and a minimum quantum of 40,000 sqm over the plan period, and there should be the opportunity to boost supply wherever the opportunity presents, including re-using high street space. While the Council's adopted Local Plan had sought to take a stronger approach to protecting employment land, the shortage of space has not improved. Therefore, the draft Plan seeks to protect against any further loss or change in the type of employment use (maintaining the designations of Locally Important Industrial Land and Business Parks which are considered Locally Significant Industrial Sites (LSIS) and renaming Key Office Areas as Key Business Areas), expecting employment-led intensification and all major new development to consider the opportunity to include commercial use. There is emphasis on providing space for the borough's locally important sectors, and affordable, adaptable workspaces to meet future economic needs. The Council has made a non-immediate [Article 4 Direction to remove PD rights for change of use from Class E to residential](#) which includes the designated employment sites.

#### ***Town centres and retail:***

Experian's latest expenditure projections recommend relatively modest levels of growth when compared with historic trends. In the past the evidence base has identified a need for modest additional retail floorspace as a whole driven primarily by the borough's rising population. Structural changes to the retail sector were already underway and will have been accelerated by the COVID-19 pandemic, including shifts in customer behaviour and growth in online shopping, however a significant contraction in terms of commercial floorspace needs is not expected at this stage. The borough [Retail & Leisure Needs Study 2021](#) (phase 1) by Lichfields forecasts that up to 2034, there is a combined over-supply of 1,121 sqm gross of retail, food/beverage floorspace and other non-retail services. However, by 2039

there is an under-supply of 5,031 sqm gross across the board. In addition, there is a potential requirement for about 4,000 sqm gross of leisure/cultural floorspace by 2034 and 7,000 sqm gross by 2039.

Therefore in the short to medium term the priority is the reoccupation of vacant shop units, potentially for non-retail uses including food/beverage outlets, leisure, entertainment and cultural uses, which theoretically could accommodate the need for all new town centre uses up to 2034. 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 projected growth, through vacant properties and growth in sales densities.

The retail policies therefore continue the existing hierarchy of the centre network guidance set out in Table A1.1 of the London Plan. We have recognised the importance of smaller centres to Living Locally (Policy 1), and setting a positive approach to repurposing our High Streets through diversification including leisure and community use, including space that can be repurposed and adapted to reflect modern retail and workspace needs (see below further details regarding employment needs) where policies can be applied despite the significant impact of changes to the use classes.

It is recognised that residential can be appropriate on upper floors/to the rear and peripheries of centres, details are also set out in paragraph 18.28. The Council has made a non-immediate [Article 4 Direction to remove PD rights for change of use from Class E to residential](#), covering the extent of the designated centre hierarchy, identified for their contribution to the overall vitality and viability of our centres and recognising the importance of having access to local shops and services to enable Living Locally.

Phase 2 of the borough Retail & Leisure Needs Study will include a detailed quantitative and qualitative assessment of the need (including a new household survey) for new retail, leisure and other main town centre uses within the borough, and will commence in early 2022. Attached is a note on the Proposed Methodology produced by Lichfields for sharing with neighbouring authorities. If you have any thoughts to inform Phase 2, please also let us know by the end of January 2022 (we will also be reviewing the draft household survey questions to reflect the current context).

### ***Transport infrastructure:***

Transport has been recognised as a strategic issue in the past.

Policies 47 and 48 cover sustainable travel and details around parking/cycle parking standards, servicing and Construction Logistics Management. There is a strong emphasis on walking and cycling as the natural choice, particularly for short journeys, which fits with the Living Locally concept. These policies have been drafted in liaison with our transport planners, and reflect the Council's Active Travel Strategy and the Third Local Implementation Plan. The policies reflect the London Plan and the Mayor's Transport Strategy, including for vehicle and cycle parking standards, and supporting the Healthy Streets approach (also reflected in Policies 1 and 51) and car-free development. A threshold approach linked to development size as to whether a separate Transport Statement or Transport Assessment is required for different types of uses is proposed, to enable resources to be focused on the schemes that have most impact.

The draft Plan also refers to aspirational improvements for transport links within a number of the place-based strategies, including a new pedestrian and cycle bridge connecting Ham to Twickenham, a green walkway along Barnes Bridge, a cycle scheme on Kew Road, the potential for a new cycle hub at Kew Gardens and upgrades to the Kew Gardens Station footbridge, a top potential route through Sheen and Mortlake into the neighbouring borough of Wandsworth (as identified in TfL's London Cycling Action Plan), and other local potential improvements to increase active travel. However, none of these are linked to infrastructure requirements directly necessary for future growth. Crossrail 2 is not referred to,



until a timetable and funding is confirmed. An update to the Council's Infrastructure Delivery Plan will be undertaken in 2022. Policy 47 refers to safeguarding routes and facilities, with petrol stations and existing bus garages referred to at paragraph 23.21.

Note under Natural Environment below, the HRA has raised an issue and therefore strategic traffic modelling will be explored to consider further the impact of proposed development (as a result of the Richmond Local Plan alone and/or in-combination with others).

***Water supply and wastewater management:***

This has not been identified as a strategic issue in the past. Policy 9 deals with water resources and infrastructure.

***Climate change adaption:***

While this has not been identified as a strategic issue in the past, recognising the need to address the climate emergency is a shared priority.

The approach to flood risk and sustainable drainage is updated in Policies 8 and 54, incorporating recommendations from the [Strategic Flood Risk Assessment](#) (SFRA) 2020, including climate change allowances (use of 'upper end' scenarios) and approach to the Sequential Test. In addition, a [Flood Risk and Development Sequential Test](#) has been undertaken. There continues to be joint working as part of the [Thames Regional Flood and Coastal Committee](#) and the [London Drainage Engineers Group \(LoDEG\)](#).

There are a number of other policy areas that contribute to adaptation to climate change. The Plan sets requirements for new development on all sites, including small sites, to contribute to urban greening in Policy 38 (reflecting the London Plan UGF methodology), and Policy 39 requires a minimum of 20% contribution towards delivering measurable biodiversity net gain.

***Climate change mitigation:***

While this has not been identified as a strategic issue in the past, recognising the need to address the climate emergency is a shared priority.

The draft Plan takes a significantly stronger approach to climate change with a number of policies seeking to mitigate by reducing carbon emissions, from promoting energy efficiency to reducing the need to travel. The Plan recognises that with a significant proportion of small developments in the borough, the cumulative impact of all minor developments represents a large source of carbon emissions, therefore extending requirements to all development in Policy 4. In addition, the carbon offset is proposed at £300/t in order to incentivise developers to implement on-site lower carbon strategies where possible, and to ensure that any remaining carbon shortfall can adequately be addressed off site.

***Energy infrastructure:***

This has not been identified as a strategic issue in the past. Policy 5 sets out requirements for decentralised energy and maximising opportunities for on-site electricity and heat production from renewable energy sources, with emphasis on non-combustible / non-fossil fuel energy for decentralised energy networks.

***Health infrastructure:***

This has not been identified as a strategic issue in the past. The adopted Local Plan recognises health and wellbeing as a cross-cutting theme, which has been continued. Policy 51 sets out an updated approach, to reflect health priorities and future infrastructure needs, such as space for social prescribing, emphasis on inclusive access, dementia-friendly environments, and access to public toilets and free drinking water. The Plan reflects London Plan Policy E9 in taking a restrictive approach to takeaways. The Plan links with related health plans and strategies, and the move to integrated care systems.

***Schools and education:***

This has not been identified as a strategic issue in the past. The approach in Policy 50 remains to safeguard land and buildings in educational use, with additional details added regarding provision of childcare places, and to involve the Council's Achieving for Children (provider of our children's services) in discussions. The potential medium to longer-term implications of the COVID-19 pandemic in terms of birth rates, migration, and socioeconomic factors which may impact on future demand for school places is being kept under review.

***Community and cultural infrastructure:***

This has not been identified as a strategic issue in the past. Policy 49 continues a protective approach towards existing social and community infrastructure, and requiring new provision to be inclusive and adaptable, and accord with Living Locally. An update to the Council's Infrastructure Delivery Plan will be undertaken in 2022.

The draft Plan does recognise the importance of the borough's cultural infrastructure, and the potential to enhance the leisure and cultural offer particularly in supporting the diversification of our town and local centres, which is reflected in many of the place-based strategies. As mentioned above, the borough Retail & Leisure Needs Study 2021 (phase 1) also forecasts there could be a requirement for about 7,000 sqm gross of leisure/cultural floorspace by 2039. There are details in Policies 17 and 18 and the relevant place-based strategies proposing Cultural Quarters for Richmond and Twickenham (the extent of which are described on page 199 and generally indicated as a symbol on the Key Diagram) and recognising there are other existing clusters in smaller centres (many have for example a theatre or a library to provide a cultural offer). This reflects London Plan Policy HC5 as set out in paragraph 18.27 of the draft Plan. There is also reference to the London Cultural Infrastructure Map at paragraph 18.26.

Policy 26 continues to reflect London Plan requirements to protect existing visitor accommodation and support a growth in the visitor economy, based on London Plan Policy E1 which seeks an additional 58,000 bedrooms of serviced accommodation by 2041. The Working Paper 88, Projections of demand and supply for visitor accommodation in London to 2050, GLA Economics, 2017 suggested in Table 20 that 157 new hotel rooms would be anticipated in the borough to 2041 based on shares of the London supply projection. There is uncertainty regarding the future impact of the COVID-19 pandemic on travel, although the draft Plan notes also the short-term potential for staycations and the Mayor's 'Let's Do London' campaign. In the borough we are seeing proposals for change of use from visitor accommodation to alternative uses, and while policy resists the loss of bedspaces, it would be useful to know if the GLA has any updated intelligence around future projections, or plans to update the evidence base.

***Historic environment:***

Although this has not been identified as a strategic issue in the past, there is significant emphasis in the draft Plan on the borough's historic environment. The [Urban Design Study](#) (UDS) 2021 by Arup sets out the importance of the borough's local character, including the setting of the River Thames and our designated heritage assets. This was informed by a public consultation in May/June 2021, inviting comments on what is special about certain areas/places in the borough, and analysis of the 412 responses received is set out in the UDS (Appendix F).

Policy 28 sets the broad strategic approach to local character and design quality, linked to the UDS, and requires all proposals to follow a character- and design-led approach to site optimisation. Policy 44 sets out how good design should be delivered through the planning process. The UDS has identified tall and mid-rise building zones where there is potential for growth, although these are limited due to the borough's constraints, with the details set out in Policy 45 to address the requirements of London Plan Policy D9.

The draft Plan continues to protect heritage assets, with the specific policy for Royal Botanic Gardens, Kew World Heritage Site retained. The draft Plan sets out a presumption in favour of refurbishment, in Policy 28, in terms of the re-use of heritage assets, and throughout the Plan, recognising the energy savings due to the embodied carbon in existing buildings. The UDS work has identified further additional local views and it is intended that these will be consulted upon in a Views and Vistas SPD (in 2022, ahead of the Regulation 19 draft of the Plan).

#### ***Natural Environment:***

Although not identified previously as a strategic issue, there is a need for a consistent approach to Green Belt and MOL across London. The [Open Land Review \(Green Belt, MOL, LGS and OOLTI\) 2021](#) was undertaken by Arup and has been published. We consulted key stakeholders including yourself on the Draft Methodology Paper back in March 2021 to ensure consensus on the approach, and the responses we received informed the open land review and are set out in Table C4.1 of the [Green Belt, MOL, LGS and OOLTI Review overarching report 2021](#). Land designated as Green Belt was assessed to meet the purposes strongly and all land was recommended for retention. The majority of the MOL has been assessed as performing strongly, with some areas scoring weakly against the MOL criteria. The study has also assessed existing OOLTI, the majority of which meet the criteria for designation. The Study also assessed a number of potential sites for LGS designation, some of which the Council is taking forward as new sites. Overall, there are recommendations for changes to only a small number of existing or new sites to be considered as reflected in this Local Plan – within Policies 35 and 36. Site Allocation 5 is based on the fact that this is currently car park hard-standings and a petrol station, which performs weakly against all London Plan MOL criteria; the exceptional circumstances justifying the MOL release to meet identified affordable housing needs are set out in Policy 11, and therefore this site allocation requires 100% on-site affordable housing.

As mentioned above under climate change adaption, the draft Plan takes a strong approach towards green and blue infrastructure, and particularly policy requirements around biodiversity and urban greening.

The [Nature Conservation Review 2021](#) by Salix Ecology has been published and identifies sites for upgrading, downgrading, or new or potential candidate sites, these are detailed in Appendix 4 of the draft Plan which includes lists of sites and boroughwide maps. The report has been submitted by our nature conservation colleagues to the London Wildlife Sites Board for approval as per the London Site of Importance for Nature Conservation guidance. Candidate SINC sites will be surveyed in 2022, at which point a decision will be made whether to include them as SINC sites in the next draft (Regulation 19) version of the Plan.

We would also like to draw your attention to the [Habitats Regulation Assessment \(HRA\)](#). This has been undertaken by LUC and flagged up that a potential negative effect on the protected Wimbledon Common Special Area of Conservation (SAC) cannot be ruled out (according with recent judgements, that in-combination air pollution effects are expected to be assessed). Despite the provision of in-built mitigation provided within the draft Plan, alongside the Council's Air Quality Action Plan which will provide some level of mitigation, in line with a precautionary approach further traffic modelling is required. Our transport colleagues have already requested from TfL strategic traffic modelling (affecting A219, A3 and A306 in the vicinity of 200m of Wimbledon Common SAC) to assist with this, so we can explore further whether proposed development (as a result of the Richmond Local Plan alone and/or in-combination with others) will exceed a threshold of 1000 AADT for non-HGV's and 200 AADT for HGV.

#### ***Telecommunications infrastructure:***

This has not been identified previously as a strategic issue. Policy LP33 sets out an updated approach, reflecting London Plan requirements.

#### **Other matters:**

It would be helpful to hear from the GLA the latest on the Mayor's engagement with the wider South East, although we note the recently launched 'Planning for London programme' to identify issues that a future London Plan review could consider which may take this forward.

In addition, we would be grateful if the GLA could advise whether the Council should initiate any further detailed Duty to Co-operate discussions regarding:

- the London Enterprise Partnership for London, or whether discussions have adequately covered through the Mayor's role in leading economic growth and job creation in London.
- in the absence of a Local Nature Partnership (which does not exist due to cut in funding), whether discussions have adequate covered through the Mayor's lead on green infrastructure across London, including through programmes under the All London Green Grid policy framework.

## Duty to Co-operate Meeting

### GLA, TfL and London Borough of Richmond upon Thames

20 January 2022 10:30, Virtual MS Teams - [REDACTED]

**Invited attendees (any others are welcome to join – should be able to use the link above):**

TfL: [REDACTED]

GLA: [REDACTED]

Richmond: [REDACTED]

1. Welcome introductions
2. Brief overview on Richmond Local Plan
  - Richmond Local Plan – at Regulation 18 consultation
3. Identification and discussion of strategic and/or cross-boundary issues and priorities (using the detailed update on the Richmond Local Plan as a starting point for discussions)
  - Overall approach including spatial strategy and site allocations
  - Housing including affordable housing
  - Gypsies and Travellers
  - Transport infrastructure (*aim to have this discussion with TfL attendees present between 11 and 11:30*)
  - Employment
  - Town centres and retail - linked with Community and cultural infrastructure and visitor economy
  - Water supply and wastewater management
  - Climate change adaption
  - Climate change mitigation
  - Energy infrastructure
  - Health infrastructure
  - Schools and education
  - Historic environment
  - Natural Environment including Open Land Review
  - Telecommunications infrastructure
  - Waste management
4. Statement(s) of Common Ground – including timescales, sign off arrangements
5. Any Other Business including consideration of next steps / future meetings
  - Any additional consultations suggested – London Enterprise Partnership, Local Nature Partnership
  - Planning for London Programme