

Sustainability Appraisal: Richmond Local Plan (Regulation 19)

Planning

9 June 2023

Public Consultation to 24 July 2023

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Non-Technical Summary

Introduction and Background

This Non-Technical Summary (NTS) provides an overview of the Sustainability Appraisal (SA) for the Richmond Local Plan. The SA investigates the likely significant impacts on the borough in terms of the contribution towards sustainability if the Local Plan for the London Borough of Richmond is implemented.

The Local Plan sets out the priorities for the growth, renewal and regeneration of the borough and will be used for directing investment and making decisions on development proposals.

It is very important that the Richmond Local Plan contributes to a sustainable future for the borough. To support this objective, the Council is required to carry out a SA of the Local Plan. SA is a means of ensuring that the likely social, economic and environmental effects of the Local Plan are identified, described and appraised. It also incorporates Strategic Environmental Assessment (SEA).

The development and appraisal of the Plan is an iterative process, with the policies being refined to take account of appraisal and consultation. The policies have been subject to SA to ensure that they are the most appropriate.

The SA has influenced the Local Plan resulting in a more sustainable plan; ensuring environmental, social and economic factors have been integral to decision making in its preparation. This report accompanies the Local Plan.

What Has Happened So Far and Next Steps

The first stage of the SA process (Stage A) was the production of the Draft Revised Sustainability Appraisal Scoping Report for the Local Plan of the Richmond Local Plan (July 2020) which set out the method of appraisal. It can be downloaded from the Council's website¹, and should be read in conjunction with this report.

Stage B involved comparing the aims of the Local Plan with the 14 sustainability objectives developed as part of the sustainability appraisal scoping, developing alternatives for emerging proposals and policies within the plan and producing a first draft of a sustainability appraisal of those policies. The options and alternatives for the policies as well as site allocations, to be included in the draft Local Plan, were assessed against the 14 sustainability objectives. The Sustainability Appraisal results have been used to inform which policy options, site allocations and proposals should be included in the draft Local Plan.

Activity	Output
Stage A: Sets the context, objectives and scope for the Sustainability Appraisal.	Scoping Report
Stage B: Develops and refines alternatives and assesses effects. Consults.	Interim Sustainability Appraisal Report
Stage C: Prepare the final Sustainability Appraisal Report.	Review consultation responses and final Sustainability Appraisal Report (this report)
Stage D: Formal representation and examination.	Post-Adoption Statement
Stage E: Monitor	Monitoring

¹ [Sustainability Appraisal of Local Plan - London Borough of Richmond upon Thames](#)

At **Stage C** – this stage - a final SA Report is prepared to accompany the Local Plan and will be available for representations (alongside the Local Plan itself) prior to consideration through an Examination in Public (EiP) (**Stage D**).

Following EiP, the Council will issue a Post-Adoption Statement after the adoption of the Local Plan. During the period of the Local Plan, the Council will monitor its implementation and any significant social, economic and environmental effects (**Stage E**).

Scoped Sustainability Objectives

The vision and objectives, each policy, Place-Based Strategies and site allocations presented in the draft Local Plan are assessed in terms of the overall balance of impacts on a scoped set of Sustainability Appraisal objectives as presented below.

SA objectives for the London Borough of Richmond upon Thames Local Plan			
	Env	Econ	Soc
1) To prevent and reduce the amount of waste, and minimise the use of non-renewable resources.	✓		
2) To reduce pollution (such as air, noise, light, water and soil), improve air quality and minimise impacts associated with developments.	✓		✓
3) To reduce reliance on private transport modes, encourage alternatives to the car, and enhance safer routes and permeability for walkers and cyclists.	✓		✓
4) To tackle the climate emergency by reducing greenhouse gas emissions in new developments and promoting zero carbon technologies and renewable energy	✓		✓
5) To adapt to the effects of a changing climate by protecting and managing water resources, and avoiding or reducing flood risk from all sources.	✓	✓	✓
6) To protect and enhance existing habitats, species and biodiversity, and to seek to increase these where possible.	✓		
7) To promote high quality and sustainable urban design, including preserving and, where possible, enhancing the borough's heritage assets and their settings.	✓	✓	✓
8) To protect and enhance the quality and range of parks and open spaces as part of the wider green infrastructure network.	✓		✓
9) To ensure development makes efficient use of land, buildings and infrastructure.	✓	✓	✓
10) To provide a range of high quality and affordable housing to meet local needs.		✓	✓
11) To promote healthy, safe and inclusive communities, and promote equal opportunities.			✓

12) To ensure access to local services and facilities, including local shopping, leisure facilities, sport and recreation opportunities.		✓	✓
13) To increase the vitality, viability and uniqueness of the borough's existing town centres, local centres and parades.		✓	✓
14) To promote sustainable economic growth and employment opportunities.		✓	✓

The new Local Plan sets out the Council's vision, objectives and policies for securing delivery of the Council's ambitions for Richmond. The Local Plan Strategic Vision is, '**The best for our borough**'; growth has been accommodated across the borough, making use of the borough's much valued assets, and our centres have become adaptable and vibrant places for successful local communities. The 'Living Locally' concept is at the heart of the Plan, to enable walking and cycling, with improved public realm and connectivity, for everything that is needed for daily living – and that the high streets, centres and parades meet the community's needs, providing for business, shopping, leisure and culture. The spatial strategy directs new higher density development to the town centres or places that are that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, and beyond these areas expect incremental intensification.

The Plan is drafted to accommodate future population, housing and economic growth with objectives split into themes of environment, social, and economic. The Plan has been prepared to take account of the Council's strategies and new and updated evidence base documents (including employment and retail needs assessments, Local Housing Needs Assessment, urban design study, open space study, flood risk and waste management).

Strategic policies to address priorities for the development and use of land are set out in the Local Plan as follows:

- | | |
|--|--|
| <ol style="list-style-type: none"> 1. Living Locally and the 20-minute neighbourhood. 2. Spatial Strategy: Managing change in the borough. 3. Tacking the climate emergency. 4. Minimising greenhouse gas emissions and promoting energy efficiency. 5. Energy Infrastructure. 7. Waste and the circular economy. 8. Flood risk and sustainable drainage. 9. Water resources and infrastructure. 10. New housing. | <ol style="list-style-type: none"> 11. Affordable housing. 17. Supporting our centres and promoting culture. 21. Protecting the local economy. 27. Telecommunications and digital infrastructure. 28. Local character and design quality. 34. Green and blue infrastructure. 47. Sustainable travel choices. 49. Social and community infrastructure. 50. Education and training. 51. Health and well-being. |
|--|--|

The broad policy framework set out in the Local Plan builds on the strategic policies around themes of:

- Responding to the climate emergency and taking action.
- Delivering new homes and an affordable borough for all.
- Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic.

- Increasing jobs and helping business to grow and bounce back following the pandemic.
- Protecting what is special and improving our areas (heritage and culture).
- Increasing biodiversity and the quality of our green and blue spaces, and greening the borough.
- Improving design, delivering beautiful buildings and high-quality places.
- Reducing the need to travel and improving the choices for more sustainable travel.
- Securing new social and community infrastructure to support a growing population.
- Creating safe, healthy and inclusive communities.

Place-based strategies have been prepared for all parts of the borough, namely:

- Hampton & Hampton Hill.
- Teddington & Hampton Wick.
- Twickenham, Strawberry Hill & St Margaret's.
- Whitton & Heathfield.
- Ham, Petersham & Richmond Park.
- Richmond & Richmond Hill.
- Kew.
- Mortlake & East Sheen.
- Barnes.

There are 38 Site Allocations, which are set out as part of the Strategy for each Place. Each Site Allocation contains information on development considerations and design requirements.

Summary of Sustainability Appraisal

The SA has identified the range of broadly positive effects that the Local Plan will have on a variety of economic, social and environmental factors. No noteworthy policy gaps were identified, and no significant negative effects were established that required mitigation.

Reasonable alternatives for policies were identified and assessed within the policy framework that confirmed the policy approaches being taken forward represented the most appropriate.

The Sustainability Appraisal has assessed the following components of the draft Local Plan:

- Vision and Objectives.
- Policy Framework.
- Place-based Strategies (including allocations).
- New site allocations.

Vision and Objectives

The assessments of the Local Plan objectives show that they have a largely positive effect when compared to the SA Framework. It demonstrates that the implementation of the objectives for the Local Plan is positively compatible with the scoped SA objectives. This is clearly the case where the Local Plan objectives and SA objectives are very closely aligned.

Whilst there are no obvious negative impacts, there are instances where there are uncertainties or potential tensions amongst objectives. The key areas where this arose are:

Traffic and transport: the Local Plan supports growth, renewal and regeneration. There is a risk that this will increase the demand for travel around the borough to access new developments or to allow access from new housing (for instance) to places of work and of interest. This is countered by the

ambition to locate homes near services and promote active travel with good connections through a strong movement infrastructure. The limited opportunities for meeting development needs can mean that sites available aren't necessarily in the best locations to achieve this.

Impacts on heritage and the natural environment: the Local Plan seeks to meet the identified needs for new development in the borough, but the nature of the environment – large areas of protected open land, natural environmental features, areas of high flood risk and historic settlements, for instance – means that opportunities for development are limited, and particularly so when heritage and protection are prioritised. The Local Plan does include objectives that seek to counter this, and so the impacts are assessed as uncertain rather than negative.

Balancing heritage protection and biodiversity value against development needs: the borough is in the fortunate position of having a high number of valued urban environments that include listed features and protective designations, such as conservation areas. Again, the Local Plan seeks a high quality of design and construction that minimises negative outcomes. However, advocating for the biodiversity value in non-designated sites and prioritising heritage considerations over sustainability measures in listed buildings and heritage assets may have unintended consequences for meeting development needs.

The impact of employment land: the plan seeks to protect employment land and provide additional land where new businesses may wish to establish themselves. Protecting such land can perpetuate a reliance on vehicular movements, and can also make it difficult for employees to access such sites, particularly if travelling to work occurs outside peak hours or during the evening and night. It may also perpetuate environmental impacts of industry, particularly where sites border environmentally sensitive places, such as rivers or parks. In addition to this, the permitted development rights that exist do make employment land vulnerable to change to other uses – including residential – in an unplanned way (though an Article 4 Direction has been agreed to seek to manage this more effectively). Because of the tendency for some employment land to be located away from town centres, and for such employment land to be isolated from town centres and social and community services – this could have a detrimental impact on some objectives if people end up living in such areas.

Impact of development on pollution: the need for development in the borough, alongside possible side effects of greater (or sustained) use of private transport could also have an impact on pollution from noise and light and pollution in the air. Again, objectives exist to counter this side effect, and so the impacts are uncertain.

Policy Framework

The table below provides an overview of the Local Plan policy in relation to the effects against the sustainability objectives (grouped by topic) where:

++	Represents a very positive effect
+	Shows a positive effect
0	Indicates a neutral or uncertain effect
-	Represents an unsustainable or negative effect
--	Shows a very unsustainable or very negative effect
	Objective not applicable

	Addressed in Local Plan Framework										
SA Objective	Spatial Approach and Place-Based Strategies	Responding to the climate emergency and taking action	Delivering new homes and an affordable borough for all	Shaping and supporting town / local centres as they adapt and respond to the pandemic	Increasing jobs and helping business to grow and bounce back following the pandemic	Protecting what is special and improving our areas (heritage and culture)	Increasing biodiversity and the quality of our green and blue spaces, and greening the	Improving design, delivering beautiful buildings and high-quality places	Reducing the need to travel and improving the choices for more sustainable travel	Securing new social and Community infrastructure to support a growing population	Creating safe, healthy and inclusive communities
Prevent and reduce waste, minimise non-renewable resources	+	++	O	O		+	+	+			
Reduce pollution, minimise impacts of development	+	++	O	O	O	+	++	++	+		++
Reduce reliance on public transport	++	++	+	++	O	++	+	+	++	+	++
Tackle climate emergency	+	++				+	++	+	+		
Adapt to the effect of climate change	O	++	O		O	+	++	+			++
Protect and enhance existing habitats	++	+	++	+	+	+	++	+			+
Promote high quality design and enhance heritage	+	++	++	++		++	++	++	+	+	
Protect and enhance parks and open spaces	++	+	+	+	+	++	++	+			+
Efficient use of land, buildings and infrastructure	++	++	++	++	O	+	+	++	+	+	+
Provide high quality and affordable housing for local needs	O	O	++	O	O	O	O	+	O	+	+
Promote healthy, safe and inclusive communities	+	++	++	++	++	++	++	++	+	+	++

Enable access to local services and facilities	++	+	++	++		+	++	++	+	+	++
Increase vitality and viability of town and local centres	++		++	++	++	++	+	++	+	0	+
Promote sustainable economic growth and employment opportunities	++	+	+	++	++	+	0	+		+	-

The testing of the Local Plan’s policies established that they represent a framework that best addressed the sustainability objectives. The above shows that the Local Plan policy framework has particularly very positive effects when appraised against the sustainability objective topics of:

- Protect and enhance existing habitats.
- Protect and enhance parks and open space.
- Promote sustainable economic growth.
- Reduce reliance on public transport.
- Promote high quality design and enhance heritage.
- Efficient use of land, buildings and infrastructure.
- Promote healthy, safe and inclusive communities.

Positive effects were established against topics of pollution and waste reduction and tackling the climate emergency. Consequently, the policy framework presented in the Local Plan has significant positive sustainability effects.

Place-based Strategies

The SA considered the nine place-based Area Strategies, which cover the entirety of the borough. The table below provides an overview of the effects against the scoped sustainability objectives using the following scoring:

++	Represents a very positive effect
+	Shows a positive effect
0	Indicates a neutral or uncertain effect
-	Represents an unsustainable or negative effect
--	Shows a very unsustainable or very negative effect
	Objective not applicable

	Addressed in Area-based Strategies								
SA Objective	Hampton & Hampton Hill	Teddington & Hampton Wick	Twickenham Strawberry Hill & St. Margaret's)	Whitton and Heathfield	Ham, Petersham & Richmond Park)	Richmond & Richmond Hill	Kew	Mortlake & East Sheen	Barnes
Prevent and reduce waste, minimise non-renewable resources	O	O	O		+	+	O	O	
Reduce pollution, minimise impacts of development	+	O	O	+	O	+	O	O	+
Reduce reliance on public transport	++	++	O/+	++	+	+	-/O	O	O
Tackle climate emergency	+	O	O	O	O		O	+	+
Adapt to the effect of climate change	+	+	O/+	+			+	O	+
Protect and enhance existing habitats	+	+	O		++	+	++	O	
Promote high quality design and enhance heritage	+	O	+	+	++	+	++	+	
Protect and enhance parks and open spaces	+	++	+	++	++	++	++	++	++
Efficient use of land, buildings and infrastructure	O	+	++	+	++	+	O	+	
Provide high quality and affordable housing for local needs	++	++	++	+	+	++	++	++	
Promote healthy, safe and inclusive communities	+	++	O/+	+	++	+	++	+	+
Enable access to local services and facilities	+	++	++	+	+	++	++	+	+
Increase vitality and viability of town and local centres	++	++	O	+	++	++	++	++	+
Promote sustainable economic growth and employment opportunities	+	++	+	+	+	++	+	+	+

The Areas Strategies also work alongside the objectives for the plan, and would be subject to the policies of the plan. This means that the overall emphasis of the areas strategies fits with the direction of travel of the plan, meaning an aspiration to meet development needs within an ambitious environmental agenda. This is reflected across the place-based strategies in an emphasis on strengthening centres, targeting previously used land for development, protecting and enhancing assets of acknowledged importance and seeking means of reducing the reliance of car travel and promoting active travel. Whilst land available for development is restricted, the allocations made are expected to fall into this framework.

Across the strategies, the need for development brings uncertainty about the impact in terms of waste and pollution, but this stems primarily from the addition of people and the nature of development and construction. Dependent on the details of development and its impact, there may be benefits of having more people in critical mass and improved services that do improve matters.

Four strategies were highlighted with more urgent issues. In **Twickenham**, four of the ten allocations concern the development needs of two educational institutions and two rugby stadia looking to expand. These places attract visitors and traffic from beyond the borough, and present major challenges in terms of meeting sustainability targets. They also offer, in some cases, land uses that could compete with Twickenham town centre, which will need careful consideration. However, two new allocations do contribute to overall housing need, though they are more distant from established centres.

The Place-based Strategy for **Ham** is focused on improving local services, but the land available is not close to the main parade of shops. The major opportunity lies at Ham Close, adjacent to the Village Green, but the area generally is poorly connected to the wider area and car travel may remain an essential for many people for work, shopping and other pursuits. The concern for significant heritage assets and the wider context is a strong consideration here.

The Place-based Strategy for **Richmond** is focused on the town centre, and the site allocations also seek to support this with residential development. The strategy includes two large allocations at North Sheen for redevelopment. Whilst this is positive, North Sheen itself lacks public transport and local shops and services, and this was seen as an uncertain, despite seeking no unacceptable impacts on traffic.

The Place-based Strategy for **Kew** is dominated by the open spaces, the Kew Gardens site and the shops and services around Kew Gardens station, but the allocations within the strategy are scattered. Whilst two – in East Kew – seek to repurpose underused land for commercial and residential purposes, two seek to redevelop recreational land which is distant from core centres. Kew suffers from the absence of a strong centre.

Site Allocations

Appraisals were undertaken on each group of site allocations within the Place-based Strategies. They were assessed as having a positive or neutral effect against the scoped sustainability objectives. Within each Place-based Strategy area there were different priorities and emphasis. The sites themselves had priority outcomes in response to their context and specific requirements. There were common objectives that the majority of site allocations address. These were to conserve and enhance heritage, secure biodiversity, promote urban greening, provide housing opportunities, encourage sustainable transport and provide employment space.

Eleven new allocations were assessed and the broad outcome was that the allocations are sensible in looking to deliver development in accord with the ambitions of the plan. Such ambitions would be less

likely to be achieved with no allocation. In some cases, different land uses were tested, but many of the outcomes against the objectives remain dependent on what exactly is proposed and how the policies might be applied.

Conclusion

The findings of the SA conclude that the Local Plan is well placed to deliver sustainable development. The Vision and Objectives, policies, Place-based Strategies and Site Allocations have been tested and assessed against the SA objectives and found to be broadly positive. Mitigations have been set out or suggested where appropriate. A potential monitoring framework has been established (see Appendix One).

1. Background and Methodology

1.1 Introduction

- 1.1.1 This Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), has been produced to support the Publication Draft Richmond Local Plan (Regulation 19 Plan). The production of a Sustainability Appraisal is a statutory requirement at this stage in the Plan preparation.
- 1.1.2 The Local Plan will be part of the statutory development plan for the borough, replacing the current adopted local plan. It will set out the spatial policies, area strategies, land use designations and site allocations against which all planning applications and development proposals in the borough will be assessed. The Local Plan sets the framework for sustainable development and lays the foundations for enabling renewal, regeneration and economic development, whilst protecting built and natural environmental assets.
- 1.1.3 Promoting Sustainable Development is at the heart of the National Planning Policy Framework (NPPF, 2021), stating that, *'the purpose of the planning system is to contribute to the achievement of sustainable development'*. Therefore, the planning system must work towards providing economic, social and environmental gains through guiding development. Further, Planning Practice Guidance (PPG) (2019) states that the sustainability appraisal is, *'a systematic process that must be carried out during the preparation of (local plans). Its role is to promote sustainable development by assessing the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives'*. The process ensures that the, *'proposals in the plan are the most appropriate given the reasonable alternatives'* and supplies the justification and reasoning behind the preferred options carried forward in the Draft Local Plan.
- 1.1.4 Strategic Environmental Assessment (SEA) identifies the environmental implications of the introduction of a Plan. The SEA Directive² sets out the steps that must be undertaken as part of the assessment. Fundamentally, this involves the production of an Environmental Report which is incorporated within the SA and accompanies the Publication Draft Local Plan.
- 1.1.5 The SA was prepared by officers within the Policy Planning Team. This allowed for any issues raised by the SA to be addressed by the officers writing the Plan at the earliest opportunity. The assessments were undertaken alongside the Plan preparation process. This builds on previous work also undertaken by the Council in earlier stages of the Plan process, and on comments received on the Plan during periods of consultation, notably at the Regulation 18 stage.
- 1.1.6 A SA is an integral part of the process of preparing Local Plans. It appraises the social, environmental and economic effects of the planning strategies and policies to ensure that they accord with sustainable development principles. Through the SA process, it is possible to highlight the sustainability implications of the chosen policies and put forward mitigation measures where applicable.
- 1.1.7 The five stages to the SA process are set out in Figure 1 below. This report accompanies Stage C, prepare the SA Report, and appraises whether, and how much the Publication policies and proposals contribute to or detract from meeting the SA objectives. The SA focuses on the Local

² Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment

Plan in itself. It does not appraise the Development Plan as the London Plan has been the subject of a separate SA and the Development Plan is used as a development assessment tool. Consequently, it is inappropriate to assess the Development Plan.

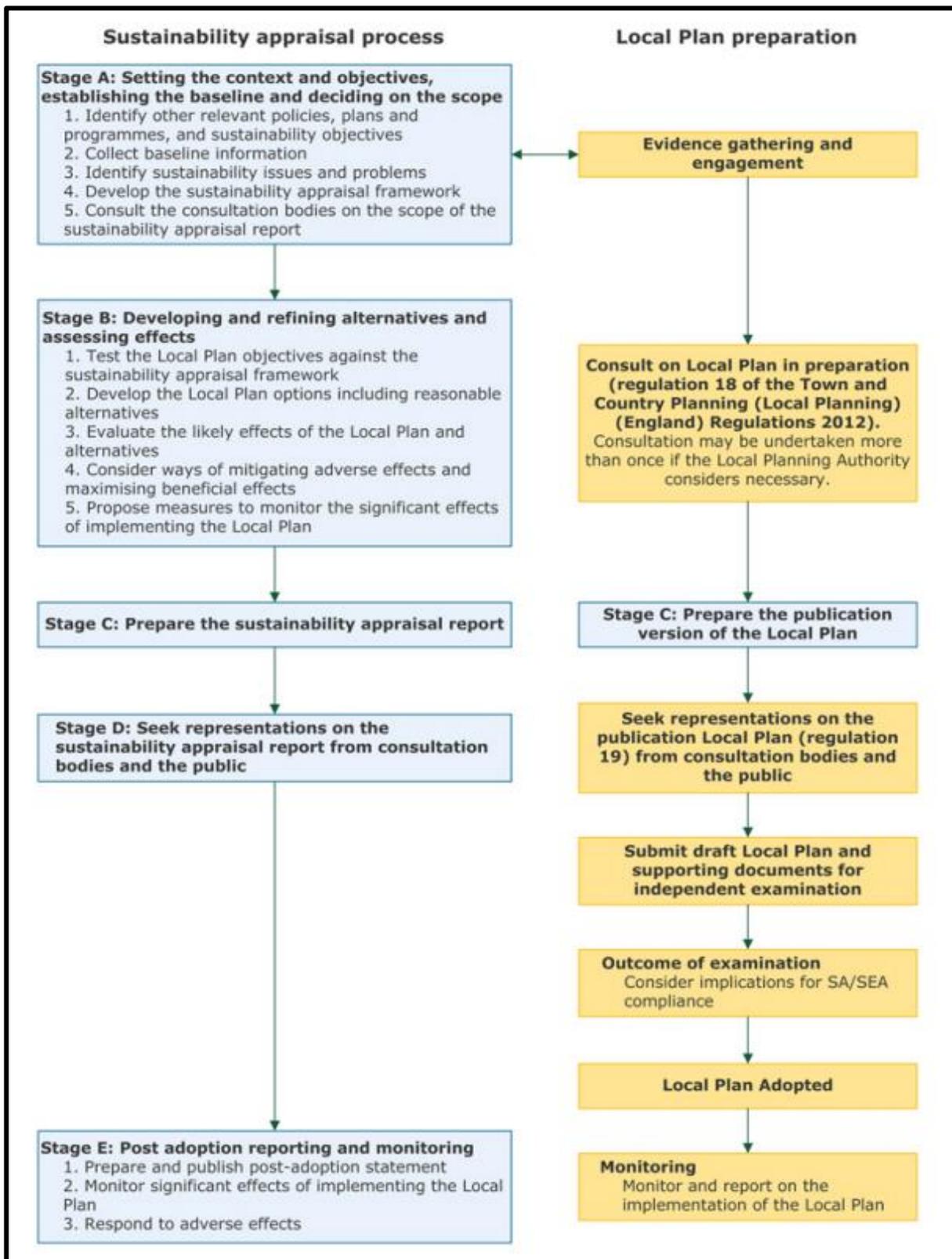


Figure 1 – The Sustainable Appraisal Process

1.2 Stages of Sustainability Appraisal

Stage A: Sustainability Appraisal Scoping Report

- 1.2.1 The first stage of the SA process (Stage A) was the production of the Draft Revised Sustainability Appraisal Scoping Report for the Local Plan of the Richmond Local Plan (July 2020) which sets out the method of appraisal. It can be downloaded from the Council's website³, and should be read in conjunction with this report.
- 1.2.2 It contains all the relevant and detailed information about the borough and identifies key sustainability issues. The Scoping Report was sent out for consultation to the three statutory consultees, (Environment Agency, Natural England and Historic England); views have also been sought from adjoining boroughs and other relevant stakeholders. The comments received further informed the baseline, and the review of plans and programmes.
- 1.2.3 The final Scoping Report, which took account of the responses submitted, was published in July 2020. This also took account of any new and emerging policies and programmes, changes to legislation and updated background data. The baseline and characteristics of Richmond and the issues highlighted are kept under review. The Sustainability Appraisal Framework set out in the Scoping Report is therefore considered appropriate for the Local Plan.

Stage B: Developing and improving the options for policies and assessing their effects

- 1.2.4 Stage B involved:
- comparing the aims of the Local Plan with the 14 sustainability objectives developed as part of the sustainability appraisal scoping;
 - developing alternatives for emerging proposals and policies within the plan; and
 - producing a first draft of a sustainability appraisal of those policies.
- 1.2.5 The options and alternatives for the policies as well as site allocations, to be included in the draft Local Plan, were assessed against the 14 sustainability objectives. The Sustainability Appraisal results have been used to inform which policy options, site allocations and proposals should be included in the draft Local Plan.
- 1.2.6 This SA shows the results of the assessment and the extent to which the options and alternatives for the policies, place-based strategies and site allocations in the borough help to achieve the relevant sustainability objectives This was published as the Sustainability Appraisal: Richmond Local Plan (Regulation 18), December 2021⁴.

Stage C: Preparing the SA report⁵

- 1.2.7 Stage C (Preparing the SA Report) involves:
- Predicting and assessing the environmental, social and economic effects of the preferred proposals and policies of the draft Plan (see Sections 3 to 5).
 - Developing proposals for monitoring (see Appendix 1).
 - Producing the Sustainability Appraisal / Environmental Report.

³ [Sustainability Appraisal of Local Plan - London Borough of Richmond upon Thames](#)

⁴ [Reg 18 Sustainability Appraisal \(richmond.gov.uk\)](#)

⁵ Current stage/this report.

- 1.2.8 The final policies and proposals for the Local Plan will be informed by the Sustainability Appraisal Progress Report (i.e. this report) and any consultation responses received on this SA Report and Pre-Publication Version of the plan⁶. The final proposals and uses for site allocations will be assessed against the sustainability objectives and the results will be presented in a final SA report (Stage D).

Stage D: Representations on the SA report and Examination in Public

- 1.2.9 Stage D will involve:
- Public consultation on the SA Report (and draft Plan).
 - Assessing significant changes arising; if appropriate.
 - Examination in Public (EiP).
- 1.2.10 At this stage, the Council will consult on the draft Local Plan and accompanying Sustainability Appraisal to find out whether the SA is acceptable, or if policies or proposals could be made more sustainable. Appropriate consideration will be given at the EiP.

Stage E: Monitoring the significant effects of implementing the Plan

- 1.2.12 Stage E will involve:
- Finalising aims and methods for monitoring;
 - Responding to adverse effects.
- 1.2.13 Stage E involves monitoring the significant effects of the Plan in order to measure its performance against sustainability objectives and inform future policy revisions (see Appendix 1).

1.3 The Local Plan

Existing Development Plan

- 1.3.1 The existing statutory development plan for the borough sets out how and where development in the borough will be delivered in the future and currently consists of the following documents⁷:
- The Richmond upon Thames Local Plan (July 2018 and March 2020).
 - The Policies Map (July 2018 and March 2020).
 - Twickenham Area Action Plan (July 2013).
 - Ham and Petersham Neighbourhood Plan (January 2019).
 - Joint West London Waste Plan (July 2015).
 - The London Plan (March 2021).
- 1.3.2 The Council adopted the current Local Plan in July 2018 (with two matters related to legal challenges adopted in March 2020). It provides the vision, objectives and strategy for the spatial development for the whole of the borough for a 15-year period from its adoption. The Local Plan is the primary development plan document for the borough and its policies assist in delivering the development requirements and needs of the borough, including numbers of new dwellings, as set

⁶ During the Regulation 18 consultation period, three representations were identified as being relevant to the Sustainability Appraisal process (from the Environment Agency, Historic England and the Ham and Petersham Neighbourhood Forum). These representations have been considered and incorporated into this report where necessary and relevant.

⁷ A note has been produced to explain the adoption process in light of legal challenges made after 2018: [local_plan_note_for_adoption_following_legal_challenges_final.pdf \(richmond.gov.uk\)](https://www.richmond.gov.uk/media/1000000/local_plan_note_for_adoption_following_legal_challenges_final.pdf)

out in the London Plan, and jobs. In addition, the Local Plan sets out policies and proposals for the borough's key development sites. The Policies Map accompanies the Local Plan and shows the plan's policies and proposals in map form.

- 1.3.3 The Area Action Plan for Twickenham Town Centre⁸ sets out detailed policies and proposals for Twickenham town centre.
- 1.3.4 Six West London boroughs (Brent, Ealing, Harrow, Hounslow, Hillingdon and Richmond upon Thames) and the Old Oak Common and Park Royal Development Corporation have together prepared the West London Waste Plan⁹. It sets out a strategy for the sustainable management of waste and also identifies and allocates sites for managing the area's waste over the period up to 2031.
- 1.3.5 The existing Local Plan, together with the Twickenham Area Action Plan, will be superseded by a new Local Plan. The Joint West London Waste Plan as well as the Ham and Petersham Neighbourhood Plan will remain unchanged.

Emerging Development Plan

- 1.3.6 Although the existing Richmond Local Plan was adopted in 2018, there have been significant changes in recent years to national planning policy and the [London Plan](#). The Council has adopted a [Climate Emergency Strategy](#) (January 2020) and an associated [Action Plan](#) in 2022, with a range of actions having a direct bearing on Local Plan policies, as will other changes to the environment and economy. The impacts of the COVID-19 pandemic are better known, but also create significant new challenges to our borough (much of which was discussed in the Scoping Report).
- 1.3.7 While elements of the 2018 Local Plan's vision are still relevant, some elements need updating, especially in relation to the borough's climate emergency and growing population. Therefore, the Council has commenced a review of its Local Plan, which will guide development across the borough over the long term. This review will involve the production of a new Local Plan, which will replace the current 2018 Local Plan and the Twickenham Area Action Plan. A revised and updated Scoping Report has been used to appraise the policies and proposals that will emerge as part of the drafting of the new Local Plan. More information on the new draft Local Plan can be viewed on the Council's website¹⁰. This includes the Local Development Scheme¹¹ which sets out the programme for the production of documents.
- 1.3.8 The Council published a Direction of Travel document, which was the first stage in the engagement process with residents, business and other stakeholders on what our vision for growth and future development should be. This was an additional stage of consultation that is not prescribed by legislation. We invited views on how the borough should accommodate growth and plan for new development. Alongside the Direction of Travel, there was a '[call for sites](#)' consultation, to identify what land may become available during the Local Plan period. Consultation ran from February to April 2020.
- 1.3.9 The impending plan is the new Local Plan Full Review, which will supersede all the borough's existing Local Plan documents with the exception of the Joint West London Waste Plan and the Ham and Petersham Neighbourhood Plan. The new Local Plan will set out policies and guidance

⁸ www.richmond.gov.uk/twickenham_area_action_plan.htm

⁹ www.wlwp.net/index.html

¹⁰ www.richmond.gov.uk/local_plan

¹¹ https://www.richmond.gov.uk/services/planning/planning_policy/local_development_scheme

for the development of the borough between 2024 and 2039. It will identify where the main developments will take place, and how places within the borough will change, or be protected from inappropriate change. The Plan will follow the approach of the presumption in favour of sustainable development and will show how it is expressed locally. It will include a Policies Map that will categorise areas designated for protection, areas where specific policies and designations will apply, and set out key site allocations.

- 1.3.10 The draft Local Plan has been prepared within the context of a hierarchical framework of planning legislation and policy for England. At the top of the hierarchy are a number of planning related Acts of Parliament and Statutory Instruments, the National Planning Policy Framework 2021 (NPPF) that sets out Government’s planning policies for England and how these should be applied, and the Planning Practice Guidance (PPG). Local authorities must take the NPPF into account when preparing local plans. This means in practical terms that the Council should follow national policy unless there is local evidence and circumstances that would justify a different approach¹².
- 1.3.11 The new Local Plan sets out the Council’s vision, objectives and policies for securing delivery of the Council’s ambitions for Richmond. The Local Plan Strategic Vision is, ‘The best for our borough’; growth has been accommodated across the borough, making use of the borough’s much valued assets, and our centres have become adaptable and vibrant places for successful local communities. The ‘Living Locally’ concept is at the heart of the Plan, to enable walking and cycling, with improved public realm and connectivity, for everything that is needed for daily living – and that the high streets, centres and parades meet the community’s needs, providing for business, shopping, leisure and culture. The spatial strategy directs new higher density development to the town centres or places that are that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, and beyond these areas expect incremental intensification.
- 1.3.12 The Plan is drafted to accommodate future population, housing and economic growth with objectives split into themes of environment, social, and economic. The Plan has been prepared to take account of the Council’s strategies and new and updated evidence base documents, including employment and retail needs assessments, Local Housing Needs Assessment, urban design study, open space study, flood risk and waste management).
- 1.3.13 Strategic policies to address priorities for the development and use of land are set out in the Local Plan as follows:
- | | |
|---|--|
| 1. Living Locally and the 20-minute neighbourhood. | 8. Flood risk and sustainable drainage. |
| 2. Spatial Strategy: change in the borough. | 9. Water resources and infrastructure. |
| 3. Tackling the climate emergency. | 10. New housing. |
| 4. Minimising greenhouse gas emissions and promoting energy efficiency. | 11. Affordable housing. |
| 5. Energy Infrastructure. | 17. Supporting our centres and promoting culture. |
| 7. Waste and the circular economy. | 21. Protecting the local economy. |
| | 27. Telecommunications and digital infrastructure. |

¹² The Government consulted upon further changes to the national planning framework between December 2022 and March 2023, as part of the Levelling Up and Regeneration Bill, and indicated a direction of travel in respect of planning policy and the approach to specific designations and considerations, such as housing delivery, green belt and plan preparation. At the time of writing, no changes had been made to the NPPF.

28. Local character and design quality.
34. Green and blue infrastructure.
47. Sustainable travel choices.

49. Social and community infrastructure.
50. Education and training.
51. Health and well-being.

1.3.14 The broad policy framework set out in the Local Plan builds on the strategic policies around themes of:

- Responding to the climate emergency and taking action.
- Delivering new homes and an affordable borough for all .
- Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic.
- Increasing jobs and helping business to grow and bounce back following the pandemic.
- Protecting what is special and improving our areas (heritage and culture).
- Increasing biodiversity and the quality of our green and blue spaces, and greening the borough.
- Improving design, delivering beautiful buildings and high-quality places.
- Reducing the need to travel and improving the choices for more sustainable travel.
- Securing new social and community infrastructure to support a growing population.
- Creating safe, healthy and inclusive communities.

1.3.15 Place-based strategies have been prepared for all parts of the borough, namely:

- Hampton & Hampton Hill.
- Teddington & Hampton Wick.
- Twickenham, Strawberry Hill & St Margaret's.
- Whitton & Heathfield.
- Ham, Petersham & Richmond Park.
- Richmond & Richmond Hill.
- Kew.
- Mortlake & East Sheen.
- Barnes.

1.3.16 There are 38 Site Allocations, which are set out as part of the Strategy for each Place. Each Site Allocation contains information on development considerations and design requirements.

Alternative Policy Options to the Spatial Strategy

1.3.17 The Plan is required to be based on an appropriate strategy, taking into account reasonable alternatives, and the sustainability appraisal is used to inform this process. The evidence base sets out that the constraints of the borough severely limit alternative approaches to delivering growth. With over two thirds of the borough being constrained by designations and the remaining areas being relatively dense low-medium rise places, the Plan is unable to meet the objectively assessed housing and employment needs.

1.3.18 The Open Land Review 2021 states that while Green Belt land in the borough is limited, over half of the borough (51.9%) is designated Metropolitan Open Land (MOL), which includes Richmond Park, Bushy Park, Kew Gardens and a substantial proportion covering the River Thames, tributaries and surrounding linear green spaces. The MOL has a significant influence on the character and development potential within the borough. The evidence highlights the importance

of protecting the borough's open spaces. An alternative option for the Plan to envisage growth on open land would be contrary to the London Plan and the NPPF. It follows, therefore, that adopting an approach that doesn't restrict development and direct it to existing urban areas would fail to provide a reasonable alternative to the spatial strategy. This is because the Plan would otherwise not promote a sustainable pattern of development as required by the London Plan and specifically paragraph 11 b of the NPPF, particularly as the application of the policies in the NPPF that protect areas such as Green Belt, Metropolitan Open Land, Local Green Space and Sites of Special Scientific Interest provide a strong reason for restricting development in the plan area.

- 1.3.19 The Urban Design Study 2021 (updated in 2023) provides a borough-wide townscape character assessment, with a deep understanding of the values, character and sensitivity of the different parts of the borough, combined with the reality of future development pressures to assess capacity. It recognises a large proportion of the borough has high sensitivity to change, including the large open spaces and river corridors as well as heritage assets. There are few areas of lower sensitivity to change. An alternative option for the spatial strategy and Plan to expect higher densities without regard to existing local character and the historic environment would be contrary to the London Plan and the NPPF. If new higher density development is dispersed across the borough, it could create unsustainable patterns of development, leading to increased travel, and negative impacts for tackling poor air quality and the climate emergency. This would be contrary to the London Plan (Policies D3 and D4) and the NPPF, which states at paragraph 130 that developments should be sympathetic to local character and history, including the surrounding built environment and landscape setting.
- 1.3.20 The new London Plan 2021 – one of the main drivers for the revision of the borough's Local Plan – was subject to an integrated impact assessment, which considered a range of spatial options, including Green Belt release and how housing growth should be accommodated, in support of the preferred approach to sustainable intensification. London is dealt with as a whole by the London Plan and this is reflected in the broad spatial distribution of housing and employment, which takes into account the borough's location in outer London. Richmond's spatial strategy is required to be in general conformity with the London Plan. It positively seeks opportunities to meet the development needs in the borough unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF. This approach is consistent with paragraph 11 b of the NPPF.
- 1.3.21 In respect of employment land, the existing position is sensitive. The borough has limited scope to provide for new opportunities and the protection of existing land is therefore an important strategic principle that accords with aims of the London Plan (Policy E7). Some of this protected land has been promoted for alternative uses – particularly for residential use – but this has been resisted because of the scarcity of the employment resource. Whilst certain individual employment sites could potentially be assessed as meeting other sustainability objectives in another land use, the need to protect employment land as a whole overrides any positive impact in this regard. This issue is akin to the protection of Green Belt and Metropolitan Open Land, where similarly some parcels of land could be assessed positively against other sustainability objectives but overall the policy requirement is to protect such land. The nature of the borough means that many of the existing commercial uses are located in residential areas, and this is not considered a justification in itself for the loss of a commercial site. The appropriate place to test specific individual alternatives would be against Policy 24 (of the Regulation 19 Plan), rather than in the process of this Sustainability Appraisal.

- 1.3.22 Recent evidence from the GLA in the London Industrial Land Supply Study 2020 has found that there has been a progressive decline in the amount of industrial stock across London since 2001 and vacancy rates for industrial land uses remain very low. The floorspace vacancy rate in 2021 for Richmond was found to be 0.4% (vs a 10-year average of 1.4%). This gives weight to the priority of the Council to protect existing industrial floorspace.
- 1.3.23 The borough’s employment evidence (Employment Land and Premises Needs Assessment 2021, updated in 2023) found that there was an ongoing shortfall in the amount of land for industrial uses in the borough. The requirement over the plan period is for a minimum of approximately 60,000sqm and there are very limited sites that could help to meet this need and a general lack of potential capacity. While the situation for industrial activity has improved in London in recent years, this was not found to have fed through to Richmond borough’s market due to the constrained nature of the borough. Subsequently, this has led to stronger economic growth in neighbouring local authority areas. It is felt that with no new land available, net additional floorspace for industrial uses can only come through intensification of existing sites, and should therefore be the default sought where possible; Policy 24 reflects this approach.

1.4 Scoping Report

- 1.4.1 The key aspects and characterisations of Richmond’s environment identified in the Revised Scoping Report for the Local Plan (July 2020) included:
- Tackling and responding to the climate emergency.
 - Sustainable construction, renewable energy and energy efficiency.
 - Protection and enhancement of the natural environment and green infrastructure.
 - Protection and enhancement of the built environment, including heritage assets.
 - High quality design and public realm.
 - Pollution and waste management.
- 1.4.2 Richmond Council has declared a Climate Change Emergency and published its Climate Emergency Strategy in January 2020. The Council resolved to become recognised as the Greenest London Borough and to produce the strategy and action plans necessary to realise the goal to become carbon neutral by 2030. London and Richmond Borough have experienced, and will continue to experience, significant changes in climate over the coming decades.
- 1.4.3 It is an unfortunate fact that Richmond upon Thames has one of the highest ecological, carbon and greenhouse gas footprints in London and the UK (see Table below).

	Ecological Footprint (gha/capita)	Carbon Footprint (tonnes CO₂/capita)	GHG Footprint (tonnes CO₂eq/capita)
UK	5.30	12.08	16.34
London	5.48	12.12	16.55
Richmond upon Thames	6.38	13.99	19.19

Table 1.1: Estimated ecological footprint, carbon footprint, GHG footprint

Source: SEI Experimental results, 2008: <https://data.london.gov.uk/dataset/environmental-footprint-data-borough>

Notes: The ecological footprint is in global hectares per capita. The carbon footprint is in tonnes of carbon dioxide. The greenhouse gas footprint is in tonnes of carbon dioxide equivalent (CO₂eq) per capita (CO₂ per capita).

- 1.4.4 The carbon footprint in Richmond upon Thames is 13.99 tonnes of CO₂ per capita . The sector with the highest contribution to this footprint is the domestic sector, i.e. housing, and more

specifically the electricity, gas and other fuels used in the home. Large contributions are also associated with the transport and food sector.

- 1.4.5 Richmond upon Thames is one of the richest boroughs in London in terms of the total area of public green space, quality and diversity of parks, open spaces, conservation areas and the wealth of different habitats and species. It has over 21 miles of River Thames frontage, the longest stretch of the River Thames of any London borough, and over 100 parks, commons and woodlands. This includes [21 Green Flag sites](#), two Royal Parks, Richmond and Bushy, containing herds of red and fallow deer, the Royal Botanical Gardens at Kew, a World Heritage Site and many other wildlife habitats.
- 1.4.6 A large contribution to the green infrastructure and open space networks are the areas designated as Metropolitan Open Land (MOL), which make up over 50% (3,054 ha) of the Borough's area. Around 140 ha within the borough are designated as Green Belt. Many of the Borough's open areas are multi-functional, i.e.. they provide important habitats for species, access to nature, sports pitches, recreational areas, playing fields, play areas and areas for just relaxing, sitting or walking.

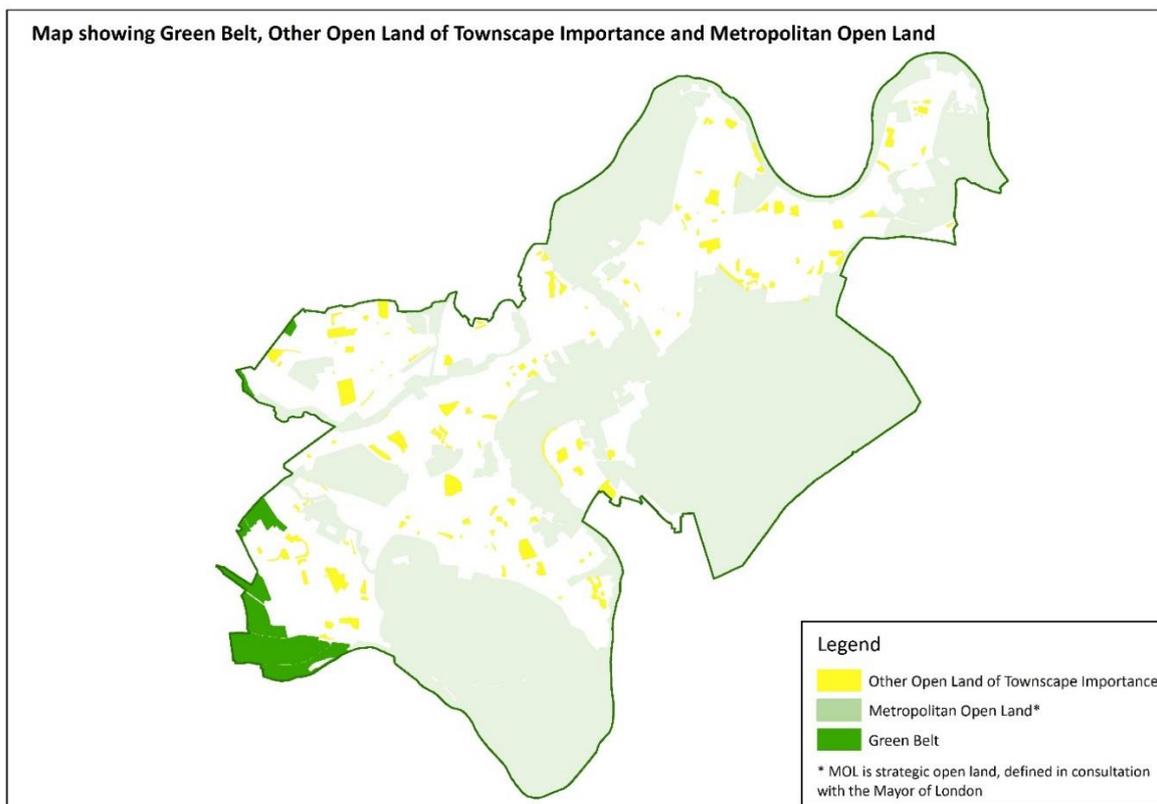


Figure 2: Designated Green Belt, Other Open Land of Townscape Importance and Metropolitan Open Land.

- 1.4.6 Historic parks and gardens cover around 2,026 ha of the Borough (generally on land also designated as MOL), whereby Richmond Park is 930 hectares and Bushy Park is 445 hectares. The borough has large areas of open grassland but many of these sites are not managed primarily for nature conservation, for example the sports pitches, recreational areas and playing fields. Sites designated as Other Open Land of Townscape Importance (OOLTI) are smaller pieces of open land; there are 168 sites designated as OOLTI.

1.4.7 Richmond has an enormous wealth of wildlife (biodiversity) and there are many important areas of land with statutory and non-statutory designations. These include three sites designated as Site of Special Scientific Interest (SSSI) (Richmond Park, Bushy Park and Barn Elms Wetland), and over 110 Other Sites of Nature Importance. The priority habitats within this borough, which are also of regional and national importance, are: Acid Grassland, Ancient Parkland/Veteran Trees, Broadleaved Woodland, Reedbeds and the Tidal Thames. The priority species, which are also of regional, national and international importance, are: Bats, Mistletoe, Song Thrush, House Sparrows, Swifts, Stag Beetles, Tower Mustard, Water Voles and Black Poplar.



Figure 3: Biodiversity in the London Borough of Richmond.

1.4.8 Richmond Park is a site of both national and international importance for wildlife conservation. It is London's largest SSSI, a National Nature Reserve and a Special Area of Conservation (SAC). The Park is a foremost UK site for ancient trees, particularly oaks. The trees and associated decaying wood support nationally endangered species of fungi, as well as a remarkable range of nationally scarce invertebrates. The Park is the third best site in Britain for decaying wood invertebrates, including the stag beetle, which is one of the reasons for the sites' designation as a SAC. Over 200 rare species of beetle can be found.

- 1.4.9 There are many important wetlands (flowing and standing water) areas within the borough. The most important is the River Thames, of which there are tidal and non-tidal sections in the borough, but also the London Wetlands Centre in Barnes, which has over 42 hectares of created lakes, ponds and marshes.
- 1.4.10 Historically Richmond upon Thames attracted royalty, as can be seen through the legacy of Royal Parks, Kew and Hampton Court Palace. The various royal palaces at Richmond, Kew and Hampton Court were refuges for pleasure and from plague. Richmond Park was given to the City of London after Charles I's execution. Henry VIII resided in Hampton Court Palace with five of his six wives, and his daughter Queen Elizabeth I lived in Richmond Palace. Numerous artists and writers contributed to the popularity and development of the area in particular, Pope, Reynolds and Turner. In 1827, Queen Victoria opened Hampton Court and Bushy Park to the public and by 1841 the two gardens of Kew were merged to form the Royal Botanic Gardens.
- 1.4.11 Richmond upon Thames has the richest historic environment outside central London with approximately 1,371 listed buildings and 85 designated Conservation Areas. There are also many notable protected trees both within Conservation Areas and with Tree Preservation Orders. Historic England, the National Trust and the Historic Royal Palaces all own properties within the borough. Heritage attractions within the borough include Hampton Court Palace, Ham House, Strawberry Hill House, Garrick's Temple to Shakespeare, Kew Palace, Marble Hill House and Richmond Theatre. There are a number of Scheduled Monuments - including The Brew House in Bushy Park; Ham House; Hampton Court Palace; King Henry VIII's Mound, Richmond Park and Kew Palace. Royal Botanic Gardens Kew was inscribed on the UNESCO World Heritage Site List in 2003 and there are 14 open spaces on the Historic England register of historic parks and gardens.
- 1.4.12 There are large areas within the borough where archaeological potential exists, such as Kew Gardens, Richmond Park, The Old Deer Park, parts of Ham and Petersham, Hampton Court and Bushy Parks, parts of Twickenham riverside and Richmond town.
- 1.4.13 Household waste accounts for around 600,000 tonnes or 87% of local authority collected waste arising in the West London Waste Authority (WLWA). Household waste in Richmond upon Thames accounted for around 77,000 tonnes of the WLWA total. The household waste collected per person in England has fallen by 9 per cent over the last eight years, from 429 kg in 2010/11 to 395 kg in 2017/18. In Richmond upon Thames the household waste collected per person per year has decreased over the period and by the year ending March 2018, stood at 378 kg per head of population.
- 1.4.14 There has been an overall reduction in the amount of local authority collected waste sent to landfill in recent years: 7,933,000 tonnes in 2013/14 to 3,213,000 tonnes in 2017/18. Energy recovery is the primary waste disposal method used by the WLWA: 60% for the year ending March 2019.
- 1.4.15 Currently around 36 per cent of waste in the borough is recycled, mainly at the Townmead Road waste transfer station in Kew. Once waste has been collected it is delivered to WLWA's Transport Avenue waste transfer station located in Brentford. The waste is compacted into ISO containers and loaded on to the railway and then taken by the Authority's rail transport contractor, EWS Ltd, for final treatment or disposal outside London. Richmond upon Thames has one of the highest household recycling and composting rates in London, rising from ranking 5th in 2010/11, at 43%. This rate improved to a peak of 46% but since 2013 has fallen, though the current rate of 43% is significantly higher than the London average of around 33%.

1.4.16 The Revised Scoping Report’s baseline review established a range of key issues for Richmond organised around recognised topics. These were identified from an examination of relevant plans, policies and programmes, from analysis of baseline data and trends, through a review of the adopted plan’s sustainability appraisal and from the responses received to the Scoping Report and preliminary consultation. These are set out in Table 1.2 below:

Aspect	Sustainability Issue
Environment	Tackling and responding to the climate emergency, including climate change mitigation and adaptation, particularly flood risk
	Sustainable construction, energy efficiency and renewable energy, including achieving zero carbon standards
	Protection and enhancement of the natural environment and green infrastructure, including green and open spaces
	Protection and enhancement of the built environment, historic assets and their settings, including heritage at risk
	High quality design and public realm
	Pollution (air, noise, water), particularly poor air quality
	Waste reduction, waste treatment and increased recycling
Social	Lack of opportunities for the provision and adequate supply of affordable housing
	Need for housing opportunities for all
	Varying levels of poverty and affluence across the borough
	Access to essential community facilities, including health, education, leisure, local services and shopping
	Creating a safe, healthy and inclusive place to live
	Reducing the need to travel, improving choices for more sustainable travel and accessible public transport for all
Economic	Protection of employment land and premises
	Skills mismatch and small employment base within the borough
	Improve the resilience of businesses and the economy
	High car use and transport infrastructure at capacity during peak times; congestion on road network
	Need for education, training and local employment opportunities

	Support the vitality, viability and uniqueness of town and local centres
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Table 1.2: Key issues for Richmond, defined in the Scoping Report

- 1.4.17 In order to measure the operation of the Local Plan, help assess the sustainability of its policies, and to monitor its achievement in sustainability terms, sustainability objectives and indicators were developed. The objectives are expressed in terms of targets, the achievement of which should be measurable using the indicators selected. This resulted in 14 objectives which reflect the adopted plan’s sustainability appraisal, but update this to reflect current priorities and ambitions of the Council alongside the changing context.
- 1.4.18 Though aligning with the borough’s Corporate Plan objectives for our communities¹³, the Local Plan SA objectives are more specific goals for land use in Richmond upon Thames. The SA objectives purely provide the framework for assessment. They are designed to provide a balance between the three objectives of sustainable development: the environment, the economy and society. The objectives reflect the key sustainability issues in the borough. The final list of draft objectives for the SA can be viewed in Table 1.3 on the next page. The associated decision making criteria are set out in Appendix One.

¹³ https://www.richmond.gov.uk/corporate_plan. The Corporate Plan has been revised between the Regulation 18 Local Plan and Regulation 19, though the four overarching objectives remain similar in direction and scope to the previous Corporate Plan.

Table 1.3: SA objectives for the London Borough of Richmond upon Thames Local Plan			
	Env	Econ	Soc
1) To prevent and reduce the amount of waste, and minimise the use of non-renewable resources.	✓		
2) To reduce pollution (such as air, noise, light, water and soil), improve air quality and minimise impacts associated with developments.	✓		✓
3) To reduce reliance on private transport modes, encourage alternatives to the car, and enhance safer routes and permeability for walkers and cyclists.	✓		✓
4) To tackle the climate emergency by reducing greenhouse gas emissions in new developments and promoting zero carbon technologies and renewable energy.	✓		✓
5) To adapt to the effects of a changing climate by protecting and managing water resources, and avoiding or reducing flood risk from all sources.	✓	✓	✓
6) To protect and enhance existing habitats, species and biodiversity, and to seek to increase these where possible.	✓		
7) To promote high quality and sustainable urban design, including preserving and, where possible, enhancing the borough's heritage assets and their settings.	✓	✓	✓
8) To protect and enhance the quality and range of parks and open spaces as part of the wider green infrastructure network.	✓		✓
9) To ensure development makes efficient use of land, buildings and infrastructure.	✓	✓	✓
10) To provide a range of high quality and affordable housing to meet local needs.		✓	✓
11) To promote healthy, safe and inclusive communities, and promote equal opportunities.			✓
12) To ensure access to local services and facilities, including local shopping, leisure facilities, sport and recreation opportunities.		✓	✓
13) To increase the vitality, viability and uniqueness of the borough's existing town centres, local centres and parades.		✓	✓
14) To promote sustainable economic growth and employment opportunities.		✓	✓

2.0 Testing the Objectives of the Local Plan

2.1 The Local Plan Vision and Strategic Objectives

2.1.1 The Local Plan adopts a broad vision and a set of supporting objectives for the borough. The current Local Plan vision¹⁴ for the borough is: **'The best for our borough'**. This is defined by themes with reference to a series of strategic statements, borne out of the key issues identified in Table 1.2 above and used as the basis for structuring the plan and identifying the strategic objectives for the plan as a whole. These strategic statements are:

- Responding to the climate emergency and taking action.
- Delivering new homes and an affordable borough for all.
- Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic.
- Increasing jobs and helping business to grow and bounce back following the pandemic.
- Protecting what is special and improving our areas (heritage and culture).
- Increasing biodiversity and the quality of our green and blue spaces, and greening the borough.
- Improving design, delivering beautiful buildings and high-quality places.
- Reducing the need to travel and improving the choices for more sustainable travel.
- Securing new social and community infrastructure to support a growing population.
- Creating safe, healthy and inclusive communities.

2.1.2 Coming from the strategic statements are the individual objectives.

Responding to the climate emergency and taking action

- Provide a clear pathway to zero-carbon for all types of new development, to minimise and mitigate the effects of climate change by requiring high levels of sustainable design and construction including reductions in carbon dioxide emissions by minimising energy consumption, promoting decentralised energy and the use of renewable energy as well as requiring high standards of water efficiency.
- Promote and encourage development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property; this includes by risk of flooding, water shortages, subsidence and the effects of overheating.
- Optimise the use of land and resources by ensuring new development takes place on previously developed land and in sustainable locations in line with the place based strategies, with a focus on reusing existing buildings and encouraging remediation and reuse of contaminated land.
- Reduce or mitigate environmental impacts and pollution levels (such as air, noise, light, odour, fumes water and soil) and secure improvements in air quality, particularly along major roads and areas that already exceed acceptable air quality standards.
- Encourage the incorporation of circular economy principles into all aspects of the design, construction and operation process in order to eliminate waste, conserve resources, and manage waste sustainably retaining its use at its highest value for as long as possible.
- Promote sustainable waste management through minimising waste and providing sufficient land for the reuse, recycling and treatment of waste, and minimise the amount of waste going to landfill in line with the West London Waste Plan.

¹⁴ Presented in a structure to aid appraisal.

Delivering new homes and an affordable borough for all

- Enable opportunities to deliver new homes across the borough, diversifying the sources, locations, type and mix of housing supply and the type of sites, through a positive approach to incremental intensification and recognising the contribution of small sites, housing in our centres and optimising delivery from large sites to meeting local housing needs.
- Maximise delivery of genuinely affordable housing across the borough through a range of measures, recognising the significant community benefits of affordable housing as a priority, and taking innovative and flexible approaches to delivery more affordable housing to meet the needs of Richmond residents.
- Promote inclusive and sustainable communities, through ensuring high standards in new housing and opportunities to build social interaction, to create cohesive, healthy and dementia-friendly communities - enabling the older population to remain independent and active for longer, as well as providing supported housing options to meet the needs of vulnerable residents.

Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic

- Create places where businesses can thrive and communities and visitors can access local shops, and a wide range of services as well as providing a leisure and cultural offer to meet the changing needs of our communities, to ensure vital viable, attractive and locally-relevant town and local centres.
- Reinforce the role of Richmond, Twickenham, Teddington, Whitton and East Sheen centres, where major new development should be focused in these most sustainable locations, while supporting local centres and parades which provide a focus for local communities to meet, shop, work and spend leisure time, as reflected in the place based strategies.
- Encourage change in our centres which will be key meeting places where social interaction and sense of community is fostered. They will act as hubs with clusters of uses, including providing opportunities for leisure and culture, to ensure they are destinations for living and working locally, proving an opportunity for linked trips.
- Require measures in new developments that contribute to active travel and improve the public realm which in turn will support the centres' attractiveness and enable people to 'live locally'.
- Create 20-minute neighbourhoods that make it easier to be physically active, enhance opportunities for walking and cycling safely, create high quality public spaces and public realm, improve connectivity and accessibility for all, and focus on supporting the high streets, centres and parades as destinations that people want to go to and use to 'live locally'.

Increasing jobs and helping business to grow and bounce back following the pandemic

- Protect and encourage a range of land and floorspace for employment use, enabling intensification of uses where appropriate, and digital connectivity infrastructure, to support a cohesive, diverse and enterprising business community.
- Provide a variety of opportunities for affordable and adaptable workspaces, encouraging opportunities to work locally.
- Ensure a range of local employment and training opportunities available to residents and to support growing businesses.

Protecting what is special and improving our areas (heritage and culture)

- Protect and enhance the environment including the heritage assets, recognising their value to the borough's residents and visitors.
- Support the borough's diverse arts and cultural facilities, recognising their importance to enriching our local communities, while also providing a destination and reason to visit the borough and an opportunity to sustainably grow the visitor economy.

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

- Protect and enhance the borough's multi-functional green and blue infrastructure networks, improving accessibility from small spaces to corridors and larger expanses, recognising the benefits for residents and visitors and the value to the local economy.
- Create developments which enhance the natural environment and contribute to the comprehensive blue and green infrastructure network to enhance biodiversity.
- Plan for walkable environments which offers opportunities to improve biodiversity, particularly when considering street connectivity as well as wildlife corridors and the movement of flora and fauna across sites and networks.
- Protect and enhance the borough's biodiversity, including trees and landscapes, requiring from new development a genuine net gain that leaves biodiversity in a better state than before.
- Require new major development to provide on-site green spaces with multi-functional benefits for biodiversity, climate change as well as health and wellbeing, including providing formal and informal education opportunities to enable people to learn about and connect with nature and biodiversity.
- Ensure new development wherever possible makes a positive contribution to greening of the borough's streets, buildings and public spaces, recognising its important role in tackling climate change.
- Protect and improve the borough's parks and open spaces, providing a balance between areas for wildlife and creating opportunities for relaxation, play, and exercise, recognising their appreciation by local communities and importance in providing for healthy active lifestyles.
- Protect and improve the unique environment of the borough's rivers, especially the River Thames and its tributaries as wildlife corridors, as opportunities for recreation and river transport increasing access to and alongside the rivers where appropriate, and gain wider local community benefits and habitat improvements when sites are redeveloped.

Improving design, delivering beautiful buildings and high-quality places

- Create places that strengthen the connection between people and the physical places they share, that can adapt over time, contributing positively to compact and walkable 20-minute neighbourhoods.
- Provide a positive approach to accommodate growth across the borough, enabling tall buildings and higher density development in appropriate locations, where all development is of high design quality to create well-designed, meaningful, practical and well-connected places.
- Ensure the design of new development draws on the special values of the boroughs unique and distinctive character and responds to areas for enhancement and

opportunities for growth, following the Plan’s design principles and place based guidance.

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

- Provide choice for how people can make their journeys through high quality connections between places, encouraging them to choose walking, or cycling or public transport for short day to day journeys – shopping, study, community and healthcare facilities, places of work, green spaces, and more – without having to use a car, and maintaining increases in active travel.
- Encourage improvements to connectivity and access to public transport - particularly enabling safe, inclusive access, taking opportunities for car-free development and supporting new technologies to enable smarter travel, to minimise the impacts of development in relation to congestion and air pollution.

Securing new social and community infrastructure to support a growing population

- Support a range of social and community infrastructure uses, which provide social value to residents and cater for a growing population.
- Provide a community offer in the borough’s centres and well-connected places, predominantly accessed by active travel.
- Ensure flexible spaces are provided as part of multi-purpose assets, which can adapt to changes, and are well supported by the communities they serve.
- Ensure sufficient provision of facilities and services for education and training for all age groups to help reduce inequalities and support the local economy; this includes school places and promoting local employment opportunities and training programmes.
- Encourage opportunities for leisure, entertainment, sport, and cultural activities, which enable active and inclusive lifestyles.

Creating safe, healthy and inclusive communities

- Create environments that enable active, resilient and inclusive communities and enable residents to lead healthy lives, including recognising the importance of opportunities for place-based connections that put people first.
- Recognise the importance of health as a cross cutting priority, from the role of streets and public spaces to providing for medical, wellness and fitness uses, ensuring inclusive access across all types of development and places, based on an inclusive neighbourhood approach, and supporting the Healthy Streets approach.
- Ensure local environmental impacts of development are not detrimental to the health, safety and the amenity of existing and new users or occupiers of a development or the surrounding area.

2.2 Testing the Vision and Objectives

- 2.2.1 The Local Plan vision and objectives were tested against the sustainability framework (presented in Section 2.0) to ascertain how compatible the aims for the borough are with the scoped sustainable objectives. Scoring was undertaken as show below.

++	Very sustainable
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+	Sustainable
0	Neutral/Uncertain
-	Unsustainable
--	Very unsustainable

2.2.2 The results of the appraisal are shown in the tables below (Tables 2.1 – 2.10) and a supporting commentary is provided afterwards.

Table 2.1 - Responding to the climate emergency and taking action															
Local Plan Objectives	Provide a clear pathway to zero-carbon for all types of new development, to minimise and mitigate the effects of climate change by requiring high levels of sustainable design and construction including reductions in carbon dioxide emissions by minimising energy consumption, promoting decentralised energy and the use of renewable energy as well as requiring high standards of water efficiency.	+			++	++		+		O					
	Promote and encourage development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property; this includes by risk of flooding, water shortages, subsidence and the effects of overheating.		+		++	++		+		O					
	Optimise the use of land and resources by ensuring new development takes place on previously developed land and in sustainable locations in line with the place based strategies, with a focus on reusing existing buildings and encouraging remediation and reuse of contaminated land.	+		+	O	+	+	+	+	++					
	Reduce or mitigate environmental impacts and pollution levels (such as air, noise, light, odour, fumes water and soil) and secure improvements in air quality, particularly along major roads and areas that already exceed acceptable air quality standards.		++		+	+	+	+							
	Encourage the incorporation of circular economy principles into all aspects of the design, construction and operation process in order to eliminate waste, conserve resources, and manage waste sustainably retaining its use at its highest value for as long as possible.	++	++		++	+		+		+					
	Promote sustainable waste management through minimising waste and providing sufficient land for the reuse, recycling and treatment of waste, and minimise the amount of waste going to landfill in line with the West London Waste Plan.	++					O								
		1	2	3	4	5	6	7	8	9	10	11	12	13	14
		Sustainability Appraisal Objectives													

Table 2.2 - Delivering new homes and an affordable borough for all

Local Plan Objectives	Enable opportunities to deliver new homes across the borough, diversifying the sources, locations, type and mix of housing supply and the type of sites, through a positive approach to incremental intensification and recognising the contribution of small sites, housing in our centres and optimising delivery from large sites to meeting local housing needs.						+	+			++	+					
	Maximise delivery of genuinely affordable housing across the borough through a range of measures, recognising the significant community benefits of affordable housing as a priority, and taking innovative and flexible approaches to delivery more affordable housing to meet the needs of Richmond residents.										++	++					
	Promote inclusive and sustainable communities, through ensuring high standards in new housing and opportunities to build social interaction, to create cohesive, healthy and dementia-friendly communities - enabling the older population to remain independent and active for longer, as well as providing supported housing options to meet the needs of vulnerable residents.		O				+				++	++	+				
		1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Sustainability Appraisal Objectives																	

Local Plan Objectives	Create places where businesses can thrive and communities and visitors can access local shops, and a wide range of services as well as providing a leisure and cultural offer to meet the changing needs of our communities, to ensure vital viable, attractive and locally-relevant town and local centres.		O	+					+	O		+	++	++	+
	Reinforce the role of Richmond, Twickenham, Teddington, Whitton and East Sheen centres, where major new development should be focused in these most sustainable locations, while supporting local centres and parades which provide a focus for local communities to meet, shop, work and spend leisure time, as reflected in the place based strategies.		O	O					+	O		+	++	++	++
	Encourage change in our centres which will be key meeting places where social interaction and sense of community is fostered. They will act as hubs with clusters of uses, including providing opportunities for leisure and culture, to ensure they are destinations for living and working locally, proving an opportunity for linked trips.		O	O			O		+	+		+	++	++	+
	Require measures in new developments that contribute to active travel and improve the public realm which in turn will support the centres' attractiveness and enable people to 'live locally'.		+	++	+			+	+			+	++	+	+
	Create 20-minute neighbourhoods that make it easier to be physically active, enhance opportunities for walking and cycling safely, create high quality public spaces and public realm, improve connectivity and accessibility for all, and focus on supporting the high streets, centres and parades as destinations that people want to go to and use to 'live locally'.		+	++	++			+	+	+		++	++	++	+
		1	2	3	4	5	6	7	8	9	10	11	12	13	14
		Sustainability Appraisal Objectives													

Table 2.4 - Increasing jobs and helping business to grow and bounce back following the pandemic															
Local Plan Objectives	Protect and encourage a range of land and floorspace for employment use, enabling intensification of uses where appropriate, and digital connectivity infrastructure, to support a cohesive, diverse and enterprising business community.	O	O	O	O	O	O	O	O	+					++
	Provide a variety of opportunities for affordable and adaptable workspaces, encouraging opportunities to work locally.			O									+		++
	Ensure a range of local employment and training opportunities available to residents and to support growing businesses.												+		++
		1	2	3	4	5	6	7	8	9	10	11	12	13	14
Sustainability Appraisal Objectives															

Table 2.5 - Protecting what is special and improving our areas (heritage and culture)															
Local Plan Objectives	Protect and enhance the environment including the heritage assets, recognising their value to the borough's residents and visitors.								+		O				+
	Support the borough's diverse arts and cultural facilities, recognising their importance to enriching our local communities, while also providing a destination and reason to visit the borough and an opportunity to sustainably grow the visitor economy.												+	+	++
		1	2	3	4	5	6	7	8	9	10	11	12	13	14
		Sustainability Appraisal Objectives													

Local Plan Objectives	Protect and enhance the borough's multi-functional green and blue infrastructure networks, improving accessibility from small spaces to corridors and larger expanses, recognising the benefits for residents and visitors and the value to the local economy.		O	O			+	+	++			+	+		
	Create developments which enhance the natural environment and contribute to the comprehensive blue and green infrastructure network to enhance biodiversity.		+	O	+	++	++	+	++			+			
	Plan for walkable environments which offers opportunities to improve biodiversity, particularly when considering street connectivity as well as wildlife corridors and the movement of flora and fauna across sites and networks.	+	+	+		+	+	+	++	+		+			
	Protect and enhance the borough's biodiversity, including trees and landscapes, requiring from new development a genuine net gain that leaves biodiversity in a better state than before.		++		+		++	+	++			+			
	Require new major development to provide on-site green spaces with multi-functional benefits for biodiversity, climate change as well as health and wellbeing, including providing formal and informal education opportunities to enable people to learn about and connect with nature and biodiversity.	O	O	O	+	+	++	++	+	+		++			+
	Ensure new development wherever possible makes a positive contribution to greening of the borough's streets, buildings and public spaces, recognising its important role in tackling climate change.		+		+		O	++				+			
	Protect and improve the borough's parks and open spaces, providing a balance between areas for wildlife and creating opportunities for relaxation, play, and exercise, recognising their appreciation by local communities and importance in providing for healthy active lifestyles.			++		+	O	+	++	+		+	++		
	Protect and improve the unique environment of the borough's rivers, especially the River Thames and its tributaries as wildlife corridors, as opportunities for recreation and river transport increasing access to and alongside the rivers where appropriate, and gain wider local community benefits and habitat improvements when sites are redeveloped.		O	+		+	+		+			+	+		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14
		Sustainability Appraisal Objectives													

Table 2.7 - Improving design, delivering beautiful buildings and high-quality places															
Local Plan Objectives	Create places that strengthen the connection between people and the physical places they share, that can adapt over time, contributing positively to compact and walkable 20-minute neighbourhoods.			++			+	++	+	+		+	++	+	+
	Provide a positive approach to accommodate growth across the borough, enabling tall buildings and higher density development in appropriate locations, where all development is of high design quality to create well-designed, meaningful, practical and well-connected places.		O	+			O	+		++	++	+	++	+	+
	Ensure the design of new development draws on the special values of the boroughs unique and distinctive character and responds to areas for enhancement and opportunities for growth, following the Plan's design principles and place based guidance.						+	++	+	+					
		1	2	3	4	5	6	7	8	9	10	11	12	13	14
Sustainability Appraisal Objectives															

Table 2.8 - Reducing the need to travel and improving the choices for more sustainable travel

Local Plan Objectives	Provide choice for how people can make their journeys through high quality connections between places, encouraging them to choose walking, or cycling or public transport for short day to day journeys – shopping, study, community and healthcare facilities, places of work, green spaces, and more – without having to use a car, and maintaining increases seen in active travel.		++	++									+	++		
	Encourage improvements to connectivity and access to public transport - particularly enabling safe, inclusive access, taking opportunities for car-free development and supporting new technologies to enable smarter travel, to minimise the impacts of development in relation to congestion and air pollution.		++	++			++			+			+	++		
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	
		Sustainability Appraisal Objectives														

Table 2.9 - Securing new social and community infrastructure to support a growing population														
Local Plan Objectives	Sustainability Appraisal Objectives													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Support a range of social and community infrastructure uses, which provide social value to residents and cater for a growing population.											++	+	+	
Provide a community offer in the borough's centres and well-connected places, predominantly accessed by active travel.			+								++	+	+	
Ensure flexible spaces are provided as part of multi-purpose assets, which can adapt to changes, and are well supported by the communities they serve.			+				+		+		++	+	+	+
Ensure sufficient provision of facilities and services for education and training for all age groups to help reduce inequalities and support the local economy; this includes school places and promoting local employment opportunities and training programmes.							+		+		++	++		+
Encourage opportunities for leisure, entertainment, sport, and cultural activities, which enable active and inclusive lifestyles.											++	++		

Table 2.10 - Creating safe, healthy and inclusive communities															
Local Plan Objectives	Create environments that enable active, resilient and inclusive communities and enable residents to lead healthy lives, including recognising the importance of opportunities for place-based connections that put people first.	O	O	O					+			++			
	Recognise the importance of health as a cross cutting priority, from the role of streets and public spaces to providing for medical, wellness and fitness uses, ensuring inclusive access across all types of development and places, based on an inclusive neighbourhood approach, and supporting the Healthy Streets approach.		+	++				+	++	+		++	++		
	Ensure local environmental impacts of development are not detrimental to the health, safety and the amenity of existing and new users or occupiers of a development or the surrounding area.	+	+		+			+		+	O				O
		1	2	3	4	5	6	7	8	9	10	11	12	13	14
		Sustainability Appraisal Objectives													

- 2.2.3 The assessments of the Local Plan objectives show that they have a largely positive effect when compared to the SA Framework. Positive effects have been identified where there is potential for the plan objectives to deliver, or contribute to the delivery, of the sustainability objectives over the Plan period. It demonstrates that the implementation of the objectives for the Local Plan is positively compatible with the scoped SA objectives. This is clearly the case where the Local Plan objectives and SA objectives are very closely aligned.

Environment objectives

- 2.2.4 The environmental objectives reflect the particular priority the plan has for managing and minimising waste, reducing pollution and negative effects of development and responding positively to the climate emergency. The environmental objectives also emphasise the potential impacts of development on the borough's heritage assets, open spaces, parks and gardens and on natural environments and biodiversity / geodiversity. Part of the response to this, within the SA objectives, is the emphasis upon high quality and sustainable design, which can ensure that new development responds to these significant considerations.
- 2.2.5 The plan's objectives in this regard are extensive, particularly within the theme relating to the climate emergency, though objectives are generally favoured towards a sustainable and considered approach to the assets of value within the borough, and how future development might protect the interests of future residents and visitors to the borough. The plan's objectives recognise the broad attractions of the borough, particularly through its heritage and setting, but also through its character, and seek to maintain and enhance this. It also makes specific references to river environments and open land, both of which are strong features of the borough.

Social objectives

- 2.2.6 The social objectives are aimed at providing the development that the community needs over the plan period both in terms of new homes and workspace, and community and social services including education, health and leisure. The SA also recognises the need for arts and cultural uses, and ties all of these needs into the distinctive character and heritage of Richmond, ensuring a place based approach.
- 2.2.7 The plan's objectives score well against the SA objectives, and emphasise the need to be responsive to contexts, to maximise the use of previously developed land and existing resources (e.g. through reuse of land and buildings and through a mixed use or flexible approach to land uses) to support the strong approach to an environmentally sensitive plan. The objectives also address inclusivity, addressing homes for older people and those with dementia, whilst including strong references to the 20 minute neighbourhood, which will ensure that people have the services they need close to the places where they live. The plan's objectives also recognise the benefits that close proximity and compactness of the urban form can have on health and well-being if this is accompanied by good public realm promoting safe and active travel over vehicular modes.

Economic objectives

- 2.2.8 The economic objectives of the plan are wide ranging and comprehensive, and focus again on the practical ambitions of the borough's growth needs, particularly around housing and employment. The objectives are sure to promote job creation and retention through the borough with a flexible and adaptable approach that both protects industrial interest, but also encourages new business in a post pandemic world. Good design and high quality is also promoted throughout the plan for all development, and should be applied to

development contributing to economic needs, particularly where this might impact on environmental priorities.

- 2.2.9 The plan has a firm focus on the role of the main town centres as generators of economic targets, and reiterates their importance in the objectives. It also recognises the benefit of clusters of shops and services throughout the borough and the economic, social and environmental benefits that maintaining and strengthening centres might have.
- 2.2.10 Whilst there are no obvious negative impacts thrown up by the objectives in the context of the SA framework, there are instances where there are uncertainties or potential tensions amongst objectives. The key areas where this arose are:
- 2.2.11 *Traffic and transport:* the Local Plan supports growth, renewal and regeneration. There is a risk that this will increase the demand for travel around the borough to access new developments or to allow access from new housing (for instance) to places of work and of interest. This may be exacerbated by the open nature of the borough (i.e. large spaces separate settlements), and because the density in outer and suburban London is less conducive to public transport and active travel than denser, inner areas. This is countered by the ambition to locate homes near services and promote active travel with good connections through a strong movement infrastructure, but it is recognised that altering existing and established travel habits may take time.
- 2.2.12 *Impacts on heritage and the natural environment:* the Local Plan seeks to meet the identified needs for new development in the borough, but the nature of the environment – large areas of protected open land and historic settlements – means that opportunities for development are limited. The opportunities for larger scale development or higher buildings are also more limited than inner London boroughs, and there is a danger that historic or protected environments, including around the rivers, could be compromised. Additionally, other activities aimed at promoting non-vehicular movement, including along the river, may have the effect of increasing human activity or human impacts upon natural landscapes and habitats, thereby compromising its value or importance. The Local Plan does include objectives that seek to counter this, and so the impacts are assessed as uncertain rather than negative.
- 2.2.13 *Balancing heritage protection against development needs:* the borough is in the fortunate position of having a high number of valued urban environments that include listed features and protective designations, such as conservation areas. Meeting development needs will be difficult in sensitive urban areas, and may not always succeed. Again, to counter this, the Local Plan seeks, through its objectives, a high quality of design and construction that minimises negative outcomes, but the SA assesses this as uncertain.
- 2.2.14 *The impact of employment land:* the plan seeks to protect employment land and provide additional land where new businesses may wish to establish themselves. The plan recognises and seeks to respond to the continued loss of office stock and industrial land, and that past rates of losses are unsustainable. Employment land is becoming increasingly vulnerable through permitted development and through redevelopment for other uses (countered to some extent through Article 4 Directions, such as to bring under control change of use from Class E to residential without the need for planning permission). This can sometimes undermine the attractiveness of employment land by removing the business advantages of clustering or co-location. It is therefore important to protect against further loss of existing office floorspace and industrial land, as it is vital for a sustainable local economy. It is

acknowledged that employment land, particularly industrial estates, are often located away from established town centres. Protecting such land can perpetuate a reliance on vehicular movements, and can also make it difficult for employees to access such sites, particularly if travelling to work occurs outside peak hours or during the evening and night when public transport is less frequent. It may also perpetuate environmental impacts of industry, particularly where sites border environmentally sensitive places, such as rivers or parks. However, on the other hand it is important to create a more self-sustaining borough, where education, training and job opportunities are available locally; employment land close to residential areas can provide a choice of employment opportunities within the borough. In addition, the plan includes a number of objectives and policies to encourage sustainable modes of travel and ensure there are no unacceptable environmental impacts, which provides some mitigation. Overall, the SA outcomes are unclear.

2.2.15 In addition to this, the permitted development rights that exist do make employment land vulnerable to change to other uses – including residential – in an unplanned way. Because of the tendency for some employment land to be located away from town centres, and for such employment land to be isolated from town centres and social and community services – this could have a detrimental impact on some objectives if people end up living in such areas. It is again noted that the Council has sought to make Article 4 Directions where possible to reduce this risk.

2.2.16 *Impact of development on pollution:* the need for development in the borough, alongside possible side effects of greater (or sustained) use of private transport could also have an impact on pollution from noise and light and pollution in the air. Again, planning objectives exist to counter this side effect alongside improvements in fuel types and efficiency, and so the impacts are uncertain.

3.0 Testing the Policies of the Local Plan

3.1 Context

- 3.1.1 The Local Plan policies contained in the Draft Local Plan have been tested against the SA objectives. Each policy has been individually appraised and commentary provided describing the potential effects. Where necessary mitigation measures have been identified in order to address adverse impacts and enhance positive effects.
- 3.1.2 Each policy has also been assessed against alternatives. This includes a 'No Policy' option and a 'Status Quo' policy option. 'No Policy' considers the sustainability outcomes if the proposed draft policy was not implemented, in these cases the assessment is based on the National Policy Planning Framework and London Plan. The 'status quo' policy option considers the sustainability outcomes should adopted plan policies (which were subject to earlier Sustainability Appraisal as part of the preparation of the previous Local Plan) continue to be used in place of the proposed Draft Local Plan policies.

Reasonable alternatives

- 3.1.3 A key part of the SA process is the consideration of reasonable alternatives to policy options. Only the consideration of reasonable alternatives is necessary. For example, heritage is a policy area supported by existing legislation and designations which provide a significant framework within which there is little scope to identify a reasonable alternative policy approach. Other policy issues may also be constrained by other policy frameworks; for example meeting housing need is required by national policy and significantly restricts the policy options - not meeting these targets could be considered unreasonable.
- 3.1.4 London has a two-tier planning system with the upper tier (the London Plan) setting out broad strategy and the lower tier plans (such as the Richmond Local Plan) required to be in general conformity with it. This limits the scope for the consideration of alternative strategies on matters such as: the supply of housing, the location of employment (for which the London Plan identifies some locations and employment types to be provided or protected); green belt / MOL and the hierarchy of town centres. Consequently, the preparation of the Local Plan and the SA can only explore policy options where the opportunity for proposing reasonable alternatives meet local objectives or responds to locally distinctive issues.
- 3.1.5 The SA has taken this into account and considered alternatives as part of the plan-making process. These possible alternatives have included:
- Varying the carbon offset price (Policy 3);
 - Seeking alternative approaches to securing affordable housing (Policy 11), including lowering the threshold for seeking affordable housing from 10 to 5 units;
 - Taking a less restrictive approach to shopping frontages in centres (Policy 18);
 - Taking a more restrictive approach in respect to the loss of employment floorspace (Policy 23);
 - Varying the targets for urban greening and biodiversity net gain (Policy 39).
- 3.1.6 In all circumstances, any alternative to the emerging policy, existing policy or no policy approach that has been taken was considered to be either unreasonable (in that it either went against the plan's evidence base and consequent recommendations for policy direction) or made insufficient differences to the outcomes against the SA objectives to be informative to policy formulation.

- 3.1.7 A key role for the SA is a focus on key issues and effects, and not to concern itself with insignificant effects or unnecessary information. The view has been taken that the three existing policy scenarios are sufficient for all policies, and further alternatives do not add anything helpful to the appraisal or policy formulation. The London Plan provides an up to date ‘baseline’ for London as a whole, providing strategic direction and a framework for development. Failing to meet the requirements of the London Plan is not considered reasonable. The adopted plan is also recent, and has provided a sound framework for planning decisions in a local context, and the emerging plan responds to recent change – notably the adoption of the London Plan and the declaration by the Council of a climate emergency – to meet new objectives, particularly around environmental objectives.
- 3.1.8 A different conclusion was reached in respect of the site allocations (i.e. in terms of considering alternatives), and this is discussed further in Section 4.
- 3.1.9 The draft policy and alternatives were tested against the scoped sustainability objectives to establish their impact (including temporal) as shown in the tables (Tables 3.1 – 3.55) below. A commentary is provided after the tables (Section 3.13).

++	likely (or intended) to be very positively affected
+	likely to be positively affected
0	likely to be neutrally or not significantly affected, or some impacts likely to be + and some -
-	likely to be negatively affected
--	likely to be very negatively affected
	Policy not relevant to objective

S	Short-Term Impact (2024 – 2028)
M	Medium Term Impact (2029 – 2033)
L	Long Term Impact (2034+)

- 3.1.10 Further, by assessing each policy individually the appraisal can fail to establish the cumulative impact across the themes of the Plan and present limiting conclusions. Consequently, a review of the policy framework across the thematic chapters of the Plan is presented.

3.2 Spatial Approach and Place-Based Strategies

3.2.1 This policy theme reflects the need to set out up front the principal objectives of the local plan in terms of how it expects development needs and other priority objectives to be balanced throughout the plan period. This includes the distribution of development, and the promotion of active travel and local provision of services. Policies 1 – 2 have been measured against the appraisal framework in this section.

Table 3.1: 1 – Supporting Living Locally (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14								
Draft Policy	+	+	++	+		O	+	+	+		++	++	++	++	L	M	S	M				
	<p>Interpretation Summary Policy 1 is a new policy that sets out the overarching approach to achieve living locally, creating environments that focus on ease of active travel and access to public services, taking into account changing high streets and workplaces, and making it clear all development should contribute to the concept. The policy’s aims should result in positive outcomes against environmental criteria, including a reduction in travel and pollution. The policy has a specific reference to inclusivity and ensuring ease of movement for all. It needs to promote a high quality of design to do this effectively, and the policy actively promotes prosperous centres and parades which can boost well-being. The policy does not provide new homes, and the reliance on green networks for movement may give rise to uncertain outcomes for natural environments and biodiversity.</p>														Though Policy 1 reflects many of the aspirations of the planning system generally, it provides focus and a vision for Richmond specifically and has the most positive effect of all possible approaches.	No negative effects identified which would require mitigation.						
Alt. 1 – No Policy	+	+	++	+		O	+	+	+		+	+	+	+			L	M	M	M		
	<p>Interpretation Summary Elements of the NPPF promote good design and place, and the London Plan contains policies that look to ensure ‘good growth’ based upon social and environmental inclusivity. Both look to achieve similar outcomes, albeit pitched at the strategic scale rather than the local. Strategic policy may take longer to see changes on the ground than locally focused policy.</p>																					

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Alt 2 – Adopted Policy (status quo)																	
	<p>Interpretation Summary The adopted plan does not directly provide a policy for this subject. Therefore, the impact is not relevant.</p>																

Table 3.2: 2 – Spatial Strategy: Managing change in the borough (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14					
Draft Policy	+	+	++	+	O	+	+	++	++	O	O	+	++	+	M	M	M		
	M	M	S	M	S	M	S	S	S	S	S	M	M	M					
	<p>Interpretation Summary Policy 2 is a new policy setting out the continuing spatial strategy of directing higher density development to town centre sites or well-connected places, prioritising previously developed land. Emphasis is on promoting green infrastructure and mitigating the impacts of climate change and protecting the borough’s environment, local character and heritage assets.</p> <p>Directing development to existing places with (or with the potential for) good facilities reduces land take. Where people gather, services - such as transport, service provision and waste collection - can be maximised and delivered more efficiently.</p> <p>Whilst committing to an approach which responds to the climate crisis, development in urban areas and close to rivers may expose more people to flood risks. Further, directing development to urban areas and mitigating for environmental costs may be less viable to deliver and undermine any desire to address affordability or equality of choice about where to live.</p>														Policy 2 responds to national and regional advice regarding accommodating growth and managing change, and defines the location for change through place-based strategies that stem from this policy. It represents the favoured approach against the SA objectives.	No negative effects identified which would require mitigation.			
Alt. 1 – No Policy	+	+	++	+	O	+	+	+	O	O	O	O	O	O	+				
	L	L	M	L	S	L	S	M	S	M	M	M	M	M	M				
	<p>Interpretation Summary Elements of the NPPF promote good design and sustainable solutions, and the London Plan contains policies that look to ensure ‘good growth’ based upon social and environmental inclusivity. The London plan also expects an assessment of growth for boroughs and expects a design-led approach, but it is for boroughs to define this in local plans. The NPPF and London Plan are pitched at the strategic scale rather than the local. They do not directly address the needs of Richmond’s centres, which tends towards an uncertain impact for specific centres as these go undefined.</p>																		

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Alt 2 – Adopted Policy (status quo)																		
	Interpretation Summary The adopted plan does not directly provide a policy for this subject. Therefore, the impact is not relevant.																	

3.3 Responding to the climate emergency and taking action

3.3.1 This policy theme reflects the over-riding objective of the plan to ensure that future development is mindful of the need to reduce its impact and affect climate change in a positive way. This includes impacts at both the local level, and the more strategic level across London and beyond. Policies address energy efficiency, flooding and water management, waste and the circular economy. Policies 3 – 9 have been measured against the appraisal framework in this section.

Table 3.3: 3 – Tackling the climate emergency (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14					
Draft Policy	++ L	+ L	++ S	++ L	++ L		+ M	+ M	+ S		++ S	+ M		+ M					
	<p>Interpretation Summary Policy 3 is a new overarching climate change policy, bringing all the different climate change strands and strengthened requirements together and setting out high level aims and expectations (e.g. net-zero carbon by 2050). The policy performs well on all objectives that relate to sustainability, sustainable construction, water management, waste and climate change. It does not specifically commit to delivering homes or improvements to town centres, or protecting green spaces, though all are implied by the policy.</p>														Policy 3 addresses the need to tackle the climate change at a local level, specifying how this will be applied at a local level to meet the plan’s objectives. It represents the favoured approach against the SA objectives.	No negative effects identified which would require mitigation.			
Alt. 1 – No Policy	+ L	+ L	+ M	O M	+ L		O M	+ L	+ S		O M	O M	O M	+ M					
	<p>Interpretation Summary The strategic advice contained within the NPPF and London Plan is focused upon moving towards a net-zero carbon approach and tackling the effects of climate change, and this would have an impact on development in Richmond. However, they do not directly address the needs of Richmond’s centres and communities, which tends towards an uncertain impact as it is less clear how these policies would be implemented in the local context.</p>																		
Alt 2 – Adopted Policy																			

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
(status quo)																	
	Interpretation Summary The adopted plan does not directly provide a policy for this subject. Therefore, the impact is not relevant.																

Table 3.4: 4 – Minimising greenhouse gas emissions and promoting energy efficiency (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Draft Policy	++ M	++ M		++ S	++ S		++ M		++ M					+			
	<p>Interpretation Summary Policy 4 seeks to significantly strengthen the requirements for net-zero carbon, setting out how all developments resulting in 1 or more dwelling have to achieve net-zero, with specific on-site carbon emission reduction requirements. It seeks to eliminate gas boilers from 2024, reduce waste and set out a new carbon offset rate of £300/t, above the current rate of £95/t. It references heritage assets specifically, recognising the constraints that may affect such developments but seeks a constructive approach to addressing this potential conflict. The policy does not cover the location of development, or protect specific assets such as parks and biodiversity.</p>														Policy 4 addresses energy efficiency at a local level, developing the strategic advice and setting a locally specific aim that will help to meet environmental objectives more effectively in Richmond. It represents the favoured approach against the SA objectives.	Policy requires production of an Energy Strategy.	
Alt. 1 – No Policy	O M	O M		O M	O M		O S										
	<p>Interpretation Summary Whilst the NPPF and the London Plan promote sustainable solutions and recognise the need to move towards net-zero carbon, much of the strategic policy focuses on strategic / major development and would not apply to smaller, local development. It is therefore uncertain that the SA objectives could be met through strategic policy alone.</p>																
Alt 2 – Adopted Policy (status quo)		+ M		++ S	++ S	+ L		+ S	++ M			++ S		+ M			
	<p>Interpretation Summary The adopted policies LP20 and LP22 are updated by Policy 4. Policy LP20 scored positively on aspects of climate change adaption, including energy efficiency and biodiversity with a consequent benefit for health and well-being. LP22 sought energy efficiency through better design and construction. The adopted policies are less ambitious than the proposed policies in their extent.</p>																

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			

Table 3.5: 5 – Energy infrastructure (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy	++ M	++ M		++ M	+ S				++ S			+ S		+ M				
	Interpretation Summary Policy 5 sets out a strengthened approach in relation to 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. The policy clarifies the types of development to which it applies.														Policy 5 addresses energy infrastructure requirements at a local level, developing the London Plan advice. It represents the favoured approach against the SA objectives.	No negative effects identified which would require mitigation.		
Alt. 1 – No Policy	++ L	++ L		++ L	+ L				++ S			O S		+ M				
	Interpretation Summary The Mayor’s Energy Planning Guidance sets out a requirement to prepare an Energy Strategy, and policy SI3 in the London Plan sets out an expectation to meet emerging standards for the timely and effective development of London’s energy system. The London Plan, however, focuses on major development and lacks any specific guidance or advice for Richmond. Some outcomes would therefore be uncertain, or take more time to realise.																	
Alt 2 – Adopted Policy (status quo)		+ M		+ S	+ S				++ S			+ S		+ M				
	Interpretation Summary Parts of the adopted policy LP22 are updated by Policy 5, including an ambition for decentralised energy networks and retrofitting of household energy infrastructure. The adopted policies are less ambitious than the proposed policies in their extent.																	

Table 3.6: 6 – Sustainable construction standards

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Draft Policy	++ S	++ S		++ S	++ S		++ S		+ S					+ S			
	<p>Interpretation Summary Policy 6 sets out a strengthened approach for BREEAM ratings from the current ‘excellent’ to ‘outstanding’ (where this is technically feasible), together with requirement for BRE Home Quality Mark for new-build residential developments and specific fabric efficiency standards. It retains the existing approach to the Sustainable Construction Checklist and maximum water consumption levels. The policy assesses well against the environmental criteria, particularly those looking to raise building expectations to meet the plan’s climate change ambitions.</p>														Policy 6 addresses standards of sustainable construction for Richmond. The London Plan doesn’t have an equivalent policy set out in this way for Richmond, and so policy 6 represents the favoured approach against the SA objectives.	Policy requires completion of a Sustainable Construction Checklist and requires prescribed BREEAM standards to be achieved.	
Alt. 1 – No Policy	+ S	+ S		+ S	+ S		O M		O M								
	<p>Interpretation Summary The NPPF and London Plan cover aspects of sustainable solutions and sustainable construction in broad terms, but there is no equivalent policy to Policy 6. Aspects of SI3 to SI5 would bring some benefits in construction and design, but the extent to which they could achieve this is uncertain.</p>																
Alt 2 – Adopted Policy (status quo)		+ M		++ S	++ S	+ L		+ S	++ M			++ S		+ M			
	<p>Interpretation Summary Parts of the adopted policies LP20 and LP22 are updated by Policy 6. The adopted policies are less ambitious than the proposed policies in their extent.</p>																

Table 3.7: 7 – Waste and the circular economy (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy	++ S		+ M	++ L														
	<p>Interpretation Summary Policy 7 updates the approach in relation to the principles of the circular economy, including new specific requirements for a Circular Economy Statement and Whole Life-Cycle Carbon assessment. The proposed policy specifically adds elements around the circular economy, seeking a change in emphasis from ‘make, use, dispose’ to recovery and regeneration of products and materials at the end of service life.</p>														Policy 7 addresses waste and the circular economy, drawing upon existing local advice. The London Plan has an equivalent strategic policy, but looks to development plans to provide local policy. Any outcomes can only be uncertain without that local advice. Policy 7 represents the favoured approach against the SA objectives.	No negative effects identified which would require mitigation. Additional guidance provided in Refuse and Recycling SPD. Major development requires Circular Economy Statement. A Construction Environment Management Plan is required for development using the river as transport.		
Alt. 1 – No Policy	+ S			+S														
	<p>Interpretation Summary Policy SI7 of the London Plan, alongside supporting guidance such as the Whole-Life Cycle Carbon Assessments LPG (2022), addresses how the Mayor, waste authorities and the industry will work to reduce waste and address the circular economy, though this is a strategic policy and refers only to referable applications. The policy supports development plans that apply the principles of the policy, and therefore the detail of how this is done in Richmond is absent.</p>																	
Alt 2 – Adopted Policy (status quo)	+ S																	
	<p>Interpretation Summary The adopted policy LP24 is updated by Policy 7. The adopted policy aimed to contribute to a more self-sustaining borough in terms of waste and ensured new development could manage its waste.</p>																	

Table 3.8: 8 – Flood risk and sustainable drainage (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy		+			++	++	+	++	O		++	+		+				
		S			S	M	M	M	M		S	S		S				
	<p>Interpretation Summary Policy 8 retains the existing Local Plan approach in relation to fluvial and tidal flood risk, with strengthened technical requirements for managing surface water flood risks and sustainable drainage as well as groundwater flood risks, including updated guidance and requirements for basement developments in flood affected areas. It incorporates recommendations from 2020 SFRA. This results in a positive score in respect of pollution (that may be caused by flooding) and a heightened score for Objective 5 because of the more comprehensive approach to flood assessment and possible compensation. Natural flood alleviation techniques may benefit habitats and open spaces. The approach is more likely to protect valued urban and natural environments. However, it may be more restrictive in terms of the land available for meeting the borough’s needs where this is at any risk from flooding.</p>														Policy 8 addresses flood risk and water management, and sets out Richmond’s policy in respect of this matter based on locally produced evidence. Policy 8 represents the favoured approach against the SA objectives.	No negative effects identified which would require mitigation. The policy requires a sequential approach to ensure that development is located in areas of the lowest risk. Statutory consultation is often required with the Environment Agency.		
Alt. 1 – No Policy		+			+	+	+	+	O		+							
		S			S	S	M	M	M		S							
	<p>Interpretation Summary Policies SI12 and SI13 of the London Plan, alongside relevant London Planning Guidance, provide a strategic basis for flood risk management and sustainable drainage in London, along with NPPF Chapter 14. This is general advice and provides no specific content in respect of Richmond’s particular needs given its context.</p>																	
Alt 2 – Adopted Policy (status quo)					+			+			+	+		+				
					S			M			S	S		S				

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	<p>Interpretation Summary The adopted policy LP21 is updated by Policy 8. The policy provides mitigation to reduce the risk to humans from flooding (including SuDS and the use of the sequential test to avoid more risky locations for development) and promotes spaces into the green infrastructure network which has a consequent benefit for health and well-being.</p>															

Table 3.9: 9 – Water resources and infrastructure (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Draft Policy		++ S			++ S	+ M		+ M		O L		+ S					
	Interpretation Summary Policy 9 largely retains the adopted approach, with updated importance on water quality.																
Alt. 1 – No Policy		O M			O M	O M		O M									
	Interpretation Summary Policy SI14 of the London Plan only provides strategic advice as to the nature of protection and direction required from development plans in respect of waterways. It defines the Blue Ribbon network and the Thames Policy area (which includes the Hampton to Wandsworth stretch) but offers no specific guidance. Without more specific guidance, any outcomes are uncertain.														Policy 9 provides detailed and specific guidance that the strategic policy cannot match, and represents the favoured approach against the SA objectives.	No negative effects identified which would require mitigation. Cross refers to Policy 53 (re: Construction Management Plans)	
Alt 2 – Adopted Policy (status quo)		+ S			++ S	+ M		+ L		O L		+ S					
	Interpretation Summary The adopted policy LP23 is updated by Policy 9. The policy has positive benefits in ensuring that development manages water effectively, avoiding problems that may arise through water mismanagement, such as water pollution and sewerage flooding. Such mitigation has benefits for the green and blue environment, including habitats.																

	Addressed in 'Responding to the climate emergency and taking action'						
SA Objective	3. Tackling the Climate Emergency	4. Minimising greenhouse gas emissions and energy efficiency	5. Energy Infrastructure	6. Sustainable construction standards	7. Waste and the circular economy	8. Flood risk and sustainable drainage	9. Water resources and infrastructure
Prevent and reduce waste, minimise non-renewable resources	++	++	++	++	++		
Reduce pollution, minimise impacts of development	+	++	++	++		+	++
Reduce reliance on public transport	++				+		
Tackle climate emergency	++	++	++	++	++		
Adapt to the effect of climate change	++	++	+	++		++	++
Protect and enhance existing habitats						++	+
Promote high quality design and enhance heritage	+	++		++		+	
Protect and enhance parks and open spaces	+					++	+
Efficient use of land, buildings and infrastructure	+	++	++	+		O	
Provide high quality and affordable housing for local needs							O

Promote healthy, safe and inclusive communities	++					++	
Enable access to local services and facilities	+		+			+	+
Increase vitality and viability of town and local centres							
Promote sustainable economic growth and employment opportunities	+	+	+	+		+	

3.4 Delivering new homes and an affordable borough for all

3.4.1 This policy theme concentrates on meeting the borough’s housing need, both in terms of the quantity necessary to meet strategic need, but also in terms of the mix and quality of housing, to ensure that housing that is provided meets the needs of the people living in the borough. It also seeks to make the best use of available land and sites whilst seeking to protect the forms of housing that are more scarce. Policies 10 – 16 have been measured against the appraisal framework in this section.

Table 3.10: 10 – New Housing (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy	- M	- L	O M		O M						++ S	+ L	+ L					
	<p>Interpretation Summary Policy 10 updates the current approach to reflect the adopted London Plan housing target, and updates broad locations for future housing, setting out the case for a stepped housing trajectory. In respect of this policy, the impacts of new building are inevitably going to impact upon environmental factors; however, a focus on town centres and existing neighbourhoods may have an encouraging impact on active travel and higher expectations of design and construction may also be helpful in meeting environmental objectives.</p>														Policy 10 is required to meet London Plan targets, and the policy achieves this whilst directing that housing across the borough.	In order to avoid the worst of any detrimental effects, other policies dealing with mitigation, minimisation of those effects and seeking high quality design need to be implemented well. Site allocations help target the most appropriate locations for housing		
Alt. 1 – No Policy	- M	- L	O M								O M	O M	O M					
	<p>Interpretation Summary Chapter 5 of the NPPF and Policy H1 of the London Plan provide strategic advice for the delivery of required housing needs. Policy H1 provides strategic advice as to the proposed location of this housing within boroughs, but no specific advice for Richmond. In isolation, this policy can only bring uncertain outcomes in respect of the best locations for housing, and does not take into account local circumstances.</p>																	
Alt 2 – Adopted Policy (status quo)	- M	- L	- M		- L						++ S	+ L	+ L					

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	<p>Interpretation Summary The adopted policy LP34 is updated by Policy 10. The policy was interpreted as having a negative impact on waste, travel, energy and water owing to the increased needs of development, though other policies seeks to address these issues through sustainable construction and other mitigation.</p>															

Table 3.11: 11 – Affordable Housing (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14					
Draft Policy										+	O			+					
	<p>Interpretation Summary Policy 11 provides an updated approach to reflect the London Plan and changes to national policy, including those in regard to viability, and the Local Housing Needs Assessment. It sets out that First Homes and a fast track viability threshold approach are not appropriate in the borough context (on account of the scarcity of large scale development sites and high house prices within Richmond). In light of this, it is uncertain as to whether the borough can genuinely meet an expectation for equal opportunity.</p>														Policy 11 responds to circumstances in Richmond that affect housing delivery. In terms of how the borough can best deliver affordable housing for its residents, Policy 11 offers the best approach.	No negative effects identified which would require mitigation. Viability is taken into account.			
Alt. 1 – No Policy										-/O	-/O			+					
	<p>Interpretation Summary Chapter 5 of the NPPF and Policies H4, H5 and H6 of the London Plan provide the strategic framework for the provision of affordable housing. This is a general pan-London approach, which does not take account of the specific issues in Richmond, particularly the issue of comparative high prices and a scarcity of available land. Whilst the policy would provide a framework, it would also create uncertainty and possible negative outcomes around viability and undersupply.</p>																		
Alt 2 – Adopted Policy (status quo)										+	+			+					
	<p>Interpretation Summary The adopted policy LP36 is updated by Policy 11. The policy sought to provide maximum amounts of affordable housing and contribute to the overall mix and balance of the borough’s communities.</p>																		

Table 3.12: 12 – Housing Needs of different groups

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy										++ L	O L	+ S						
	<p>Interpretation Summary Policy 12 expands the approach to address specific types of housing for different groups, with emphasis on priority affordable housing needs, and to ensure local needs will be met through the design of proposals and securing details around eligibility and affordability, to accord with strategies for housing, commissioning, health and social care. The policy expands the references to housing generally outside mainstream market provision to encompass custom and self-build housing, student housing and housing for specific community needs. Despite listing current Council priorities for specialist housing, and demographic changes, the Plan’s clear priority is affordable housing, and it is uncertain as to how the wider housing needs of everyone can be met in constrained circumstances.</p>														Unlike strategic advice, Policy 12 is based on a local assessment of housing stock and housing need, and provides the best policy approach for the issue based on up to date evidence.	Evidence will require updating periodically.		
Alt. 1 – No Policy										O M	O M	O M						
	<p>Interpretation Summary National and regional guidance encourages the provision of a range of homes to meet the needs of all parts of the community, and the London Plan contains a number of housing policies to ensure that borough address differing types and sizes of homes to cater for all needs. The London Plan lacks any specific guidance or advice for Richmond. Some outcomes would therefore be uncertain, or take more time to realise.</p>																	
Alt 2 – Adopted Policy (status quo)										++ L	O L	+ S						

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	Interpretation Summary The adopted policy LP37 is updated by Policy 12.															

Table 3.13: 13 – Housing mix and standards

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy			+			+				O	+	+						
	<p>Interpretation Summary Policy 13 accords with the adopted London Plan, including in terms of unit sizes and making efficient use of land. The policy, which is similar to LP35, has an updated approach to location, which contributes to meeting the objective for more active travel.</p>														Policy 13 responds to the strategic advice from the London Plan, and adds in locational advice, seeking the better use of land in locations where active travel can be furthered. This re-emphasises the commitment to environmental improvements and is therefore the preferred policy approach.	No negative effects identified which would require mitigation.		
Alt. 1 – No Policy						+				O	+							
	<p>Interpretation Summary The London Plan contains detailed advice relating to housing quality and standards, and accessibility, in Policy D6 and Policy D7. It is likely that development could come forward in Richmond whilst meeting many expectations of the borough for the size of dwellings. The policies have no locational advice.</p>																	
Alt 2 – Adopted Policy (status quo)						+				-	+	+						
	<p>Interpretation Summary The adopted policy LP35 is updated by Policy 13. The policy was assessed as having largely positive effects, with the possibility that housing opportunities could be reduced (because opportunities for smaller, denser development are reduced). Provision of amenity space gives rise to the opportunity for tree planting and greenery.</p>																	

Table 3.14: 14 – Loss of Housing

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Draft Policy	++ S	+ S					++ S		++ M	+ L	+ S	+ L		+ L			
	<p>Interpretation Summary Policy 14 reflects the London Plan, including in terms of optimising use of land and expecting replacement housing at existing or higher densities. The policy has a more advanced approach to responding to local character and assessing and replacing loss. The policy also responds to the loss of housing to longer term holiday lets.</p>														Policy 14 is the preferred approach, having a more localised response to the loss of housing, including reference to the circular economy / waste, and strong approach on holiday lets which is appropriate in the borough.	No negative effects identified which would require mitigation.	
Alt. 1 – No Policy	+ S	+ S					+ S		++ M	+ L	+ S	+ L		+ L			
	<p>Interpretation Summary The London Plan contains Policy H8, which guards against the loss of housing through demolition, replacement and changes of use, and this relates to different types of housing for different groups of people (e.g. older people, supported, etc). The policy contains no locally specific guidance.</p>																
Alt 2 – Adopted Policy (status quo)		+ S					+ S		+ L	+ L	+ S	+ L		+ L			
	<p>Interpretation Summary The adopted policy LP38 is updated by Policy 14. The policy scores well by valuing existing housing and the needs it meets. It prevents a loss of the assets (reducing waste) and provides relevant guidance on conversions, reversions and redevelopment to help meet housing needs.</p>																

Table 3.15: 15 – Infill and Backland Development

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Draft Policy		O M	+			O S	+		++ S	+	+	+	+	+			
	<p>Interpretation Summary Policy 15 takes account of types of brownfield sites where the London Plan expects optimisation for housing delivery, and a balanced approach to protecting garden land, resisting significant loss of garden land, with emphasis on assessing the harm of proposals. The policy seeks to optimise well located infill and previously developed land to contribute to housing delivery. The possibility of ‘cramming’ is offset by a requirement in the policy for a design-led approach that considers context, amenity and standards, and the threat to gardens is also addressed. This should result in focused development that supports active travel and assists centres and parades and delivers a range of house types dependent on context. It may impact upon brownfield sites where there is a biodiversity interest.</p>														Policy 15 is the preferred approach because it takes a balanced approach between the wider objective for housing delivery in the context of locally considered design factors, such as heritage, open space and height.	No negative effects identified which would require mitigation. The London Plan will provide more detailed supplementary guidance on design.	
Alt. 1 – No Policy		O M	+			O S	O M		++ S	O M	O/+ M	+	+	+			
	<p>Interpretation Summary The London Plan promotes the delivery of homes on suitable sites through Policies H1 and H2, with the latter promoting small sites. It emphasises that character can change, and well-located, accessible sites should be prioritised. Delivery on small sites is a strategic priority. Housing would come forward under this policy, but it may be that the broader objective for providing homes may take prominence over the local concerns over issues such as height and character. This might play less well with resident communities.</p>																
Alt 2 – Adopted Policy (status quo)					+	+	+	+		- L	+	+					

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	<p>Interpretation Summary</p> <p>The adopted policy LP39 is updated by Policy 15. The policy is seen to have beneficial and positive effects in protecting gardens and small sites where they provide benefits for water management and biodiversity, and in providing clear development guidance to protect amenity and observe heritage constraints where development can take place. It was scored negatively against Objective 10 for potentially limiting land for housing.</p>															

Table 3.16: 16 – Small sites

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy	O M	O M	O/+ M			++ S	++ M	+ S	+ S	++ M	+ M	++ M	++ M	+ M				
	<p>Interpretation Summary Policy 16 reflects the adopted London Plan’s emphasis on small sites, and links with the borough’s Urban Design Study (2021). The policy seeks to target sites with good public transport availability and / or that are close to centres and do this in a way that prevents impacting upon interests of acknowledged importance (heritage, open space, biodiversity etc). It acknowledges that sites may also emerge outside these target areas, but seeks to ensure no unacceptable impact in respect of other plan policies. It is uncertain whether this can be achieved whilst reducing waste, pollution and the need to travel, given that development will result in more people in targeted areas, but this may depend on detailed proposals.</p>														Policy 16 is the preferred approach because it takes a balanced approach between the wider objective for housing delivery in the context of locally considered design factors, such as heritage, open space and height.	No negative effects identified which would require mitigation.		
Alt. 1 – No Policy	+ S	O M	+ M			O S	O M		++ S	O M	O/+ M	+ S	+ S	+ M				
	<p>Interpretation Summary The London Plan promotes the delivery of homes on small sites through Policy H2. It emphasises that character can change, and well-located, accessible sites should be prioritised. Delivery on small sites is a strategic priority. Housing would come forward under this policy, but it may be that the broader objective for providing homes may take prominence over the local concerns over issues such as height and character. This might play less well with resident communities.</p>																	
Alt 2 – Adopted Policy (status quo)																		

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	Interpretation Summary The adopted plan does not directly provide a policy for this subject. Therefore, the impact is not relevant.															

SA Objective	Addressed in Delivering new homes and an affordable borough for all						
	10. New housing	11. Affordable housing	12. Housing needs of different groups	13. Housing mix and standards	14. Loss of housing	15. Infill and Backland development	16. Small sites
Prevent and reduce waste, minimise non-renewable resources	-				++		O
Reduce pollution, minimise impacts of development	-				+	O	O
Reduce reliance on public transport	O			+		+	O/+
Tackle climate emergency							
Adapt to the effect of climate change	O						
Protect and enhance existing habitats				+		O	++
Promote high quality design and enhance heritage					++	+	++
Protect and enhance parks and open spaces							+

Efficient use of land, buildings and infrastructure					++	++	+
Provide high quality and affordable housing for local needs	++	+	++	0	+	+	++
Promote healthy, safe and inclusive communities	+	0	0	+	+	+	+
Enable access to local services and facilities	+		+	+	+	+	++
Increase vitality and viability of town and local centres						+	++
Promote sustainable economic growth and employment opportunities		+			+	+	+

3.5 Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic

3.5.1 This policy theme concentrates on ensuring that our town centres and other centres (including local shopping parades) continue to function as concentrations of shops and services where neighbourhoods can meet their everyday needs. It also seeks to define a hierarchy of centres, ensuring that the largest town centre of Richmond can continue to provide a wide range of retail, commercial, leisure, cultural and other services, and attract new investment to it as one of London’s main centres contributing to the capital’s health and prosperity. Policies 17 – 20 have been measured against the appraisal framework in this section.

Table 3.17: 17 – Supporting our centres and promoting culture (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Draft Policy	+ M	O M	++ S			+ M	++ S	+ M	++ S	+ M	++ M	++ M	++ S	++ S		
	<p>Interpretation Summary Policy 17 continues the existing hierarchy of the centre network, recognising the importance of smaller centres to Living Locally, and sets a positive approach to repurposing High Streets through adaptation and diversification including leisure and community uses, whilst seeking to protect retail cores and essential retail uses. It adapts to recent evidence regarding the shift in balance between retail and non-retail uses and the subsequent allocation of space. The policy acknowledges the significant impact of changes to the use classes and the recently confirmed Article 4 Direction. This overall strategic policy seeks to protect existing commercial space and promotes enhancement of the public realm for connecting places. The policy expands on the adopted policy by specifically mentioning urban greening and climate change mitigation, and recognises residential use as a key part of town centre health.</p>														Policy 17 represents a more up to date stance to town centres based upon events that have occurred after the adoption of the London Plan, and is therefore the preferred approach.	No negative effects identified which would require mitigation.
Alt. 1 – No Policy	O M	O M	++ S				+ S	O M	+ S	O M	++ M	++ M	O M	++ S		
	<p>Interpretation Summary National and regional planning policy guidance supports the role of town (and other) centres as places to meet, socialise, shop and engage in other communal activities. They recognise that a hierarchy exists, and more significant opportunities should be directed to</p>															

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
	the more significant centres. Policies SD6 and SD7 of the London Plan would continue to protect centres, and enable this to happen, though this guidance precedes the end of the pandemic and the introduction of new PD rights and might be considered out of date.																
Alt 2 – Adopted Policy (status quo)		O M	+				+		+	+	+	+	++	+			
	Interpretation Summary The adopted policy LP25 is updated by policy 17. The policy was assessed positively on account of its support for centres generally, increasing the mix of uses and introduction of housing, which was considered beneficial for health and well-being. Whilst bringing more concentration, the policy is expected to reduce the need to travel and respect acknowledged assets.																

Table 3.18: 18 – Development in centres

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Draft Policy		O M	+				+		+	O S	+	++	+	+			
	<p>Interpretation Summary Policy 18 continues a town centre first approach, directing new major development to within the town centre boundaries, and appropriate scale development in local centres and Areas of Mixed Use. It supports uses that add vitality and viability, and states that that residential can be appropriate in defined locations. The policy links to the vision for each of the centres, designates Cultural Quarters in Richmond and Twickenham and recognises cultural clusters in smaller centres. The policy reduces the reliance on retail for town centre health and vitality. The overall impact for town centres is expected to be positive (Objective 13); whilst patterns ‘post-pandemic’ remain difficult to predict over the longer term, new PD rights that have emerged for Class E uses have some degree of control through new Article 4 Directions. The policy limits town centre uses in out of centre locations and seeks to protect existing markets.</p>														Policy 18 represents a more up to date stance to town centres based upon events that have occurred after the adoption of the London Plan, and is therefore the preferred approach.	No negative effects identified which would require mitigation.	
Alt. 1 – No Policy		O M	+				+		+	O M	O M	O S	O M	+	+		
	<p>Interpretation Summary National and regional planning policy guidance supports the role of town (and other) centres as places to meet, socialise, shop and engage in other communal activities. They recognise that a hierarchy exists, and more significant opportunities should be directed to the more significant centres. Policies SD6 and SD7 of the London Plan would continue to protect centres, and enable this to happen, though this guidance precedes the end of the pandemic and the introduction of new PD rights and might be considered out of date. This change to PD may undermine the quality and opportunities for good quality housing, and start to impact upon well-being.</p>																

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Alt 2 – Adopted Policy (status quo)		O M	+				+		O S	+	+	+	O S	+			
	<p>Interpretation Summary The adopted policies LP25 and LP26 are updated by policy 18. Whilst Policy LP25 is assessed above, LP26 introduced uncertainty in respect of the retail frontage policy because it could encourage vacancies, and was dependent on the economic cycle. This recognised changing patterns in retail, which have been further affected by the pandemic events of 2020/2021.</p>																

Table 3.19: 19 – Managing the impacts of development on surroundings

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy	O M	O/+ M	O M			O M	+ M		+ M	O M	O M	++ M	++ M	+ M				
	<p>Interpretation Summary Policy 19 updates the previous approach on over-concentration in light of the impact of changes to the use classes, with emphasis on supporting vibrant uses while managing the impacts, including the mitigation that may be sought. The policy seeks to promote active and healthy town centres but acknowledges that this will bring negative impacts for aspects of urban life, including the attractiveness of walking, increases in noise and pollution (notwithstanding the ‘agent of change’ principle) and impacts upon biodiversity. Whilst this policy seeks to mitigate these impacts, the outcome is uncertain, because it depends on the successful implementation and enforcement of issues that arise.</p>														Policy 19 manages conflicts between economic activity and quality of life in a localised manner, and represents the favoured approach.	The plan calls for a management plan for evening uses as part of the criteria. It also refers to the Council’s Special Policy on Cumulative impact that seeks to address some issues through licencing. No other effects identified which would require mitigation.		
Alt. 1 – No Policy	O M	O M	O M			O M	O M		+ M	O M	O M	++ M	++ M	+ M				
	<p>Interpretation Summary The London Plan recognises the benefits that can be brought from a diversified and extended town centre offer, and from cultural and social activities taking place beyond working hours within centres. It also recognises that there are conflicts that come about as a result of this (e.g. Policy E9, D13, HC6). As these are strategic policies, the detail of mitigation and balance is left with the local authorities, and so the outcomes here tend towards the uncertain.</p>																	
Alt 2 – Adopted Policy (status quo)		+ L					+ M		- M		+ M	+ L	O S	+ M				
	<p>Interpretation Summary The aspects of adopted policy LP26 dealing with over-concentration of uses is updated by policy 19.</p>																	

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			

Table 3.20: 20 – Shops and services serving essential needs

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy			+						+		++	++	++	++				
			M						L		M	M	S	S				
	<p>Interpretation Summary Policy 20 updates the previous approach supporting local shops and services, which is important for Living Locally, and resists the loss of public houses and other drinking establishments. The policy acknowledges the significant impact of changes to the use classes, and seeks to maintain essential services and facilities within easy walking or cycling access from homes. It applies this firmly across the borough, which may also help development to be more efficient in meeting the Living Locally vision.</p>														Policy 20 takes a proactive approach to more isolated shops and services in the borough in line with the plan objectives, and is the preferred strategy.	No other effects identified which would require mitigation.		
Alt. 1 – No Policy		-/O	O								-/O	-/O	+	+				
		M	M								M	M	S	S				
	<p>Interpretation Summary The London Plan contains a specific policy aimed at protecting public houses (HC7), but focuses on the retail hierarchy down to neighbourhood centres, which may leave relatively isolated social and community services – like local shops and services – more vulnerable. Being strategic, the policy offers general advice, but lacks specific advice for Richmond. The London Plan and NPPF pre-date any detrimental impacts that may be felt with the loosening of PD rights in respect of Class E.</p>																	
Alt 2 – Adopted Policy (status quo)		+					+		-		+	+	O	+				
		L					M		M		M	L	S	M				
	<p>Interpretation Summary The adopted policy LP26 is updated by policy 20.</p>																	

	Addressed in Shaping and supporting our town and local centres			
SA Objective	17. Supporting our centres and promoting culture	18. Development in Centres	19. Managing impacts	20. Local shops and services
Prevent and reduce waste, minimise non-renewable resources	+		O	
Reduce pollution, minimise impacts of development	O	O	O/+	
Reduce reliance on public transport	++	+	O	+
Tackle climate emergency				
Adapt to the effect of climate change				
Protect and enhance existing habitats	+		O	
Promote high quality design and enhance heritage	++	+	+	
Protect and enhance parks and open spaces	+			
Efficient use of land, buildings and infrastructure	++	+	+	+
Provide high quality and affordable housing for local needs	+	O	O	
Promote healthy, safe and inclusive communities	++	+	O	++
Enable access to local services and facilities	++	++	++	++
Increase vitality and viability of town and local centres	++	+	++	++
Promote sustainable economic growth and employment opportunities	++	+	+	++

3.6 Increasing jobs and helping business to grow and bounce back following the pandemic

3.6.1 This policy theme concentrates on making sure that there is sufficient commercial and industrial land within the borough to meet our need to maintain and create jobs within Richmond. It seeks to ensure that this happens across the range of employment types, including for office space and industrial premises. It also looks to respond to new trends for work, some of which has arisen during and after the pandemic, including providing affordable and flexible space and providing for the visitor economy, which remains vital to Richmond. Policies 21 – 27 have been measured against the appraisal framework in this section.

Table 3.21: 21 – Protecting the local economy (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy		O M	O M				+M		+S	O M	++ S	+S	++ S	++ S				
	<p>Interpretation Summary Policy 21 provides continued protection of existing employment floorspace with a focus on the importance of existing designated employment sites across the borough and our town centres. It acknowledges the importance of existing designated employment sites and town centres and the impact of changes to the use classes. It references Article 4 Directions as the policy tool that will be applied. The policy expects employment-led intensification and all major new development to consider commercial use, given local employment needs and uncertainty caused by the pandemic. There is a focus on training and education. There are uncertain outcomes regarding the use of private transport and potential pollution where existing employment sites are less accessible locations which are protected and maintained.</p>														Policy 21 promotes a localised vision for employment which responds both to Richmond’s ambitions and to the impact of the pandemic.	No other effects identified which would require mitigation.		
Alt. 1 – No Policy		O M	O M				+M		+S	O M	O M	O M	O M	O M				
	<p>Interpretation Summary Broadly, national guidance and the London Plan supports the maintenance of office and industrial land / locations where it currently exists and within sustainable locations such as town and other centres (Policies E1, E2, E3). However, strategic policies cannot provide</p>																	

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	specific guidance for Richmond, or a policy steer that is responsive to Richmond's circumstances or vision. London Plan policies pre-date the pandemic and changes to PD.															
Alt 2 – Adopted Policy (status quo)		O M	+ S						+ M	O M	+ M	+ M	++ S	++ S		
	<p>Interpretation Summary</p> <p>The adopted policies LP40, LP41 and LP42 are updated by Policy 21. The policies were generally scored as positive for protecting the economic needs of the town centres and the wider borough, but had uncertain outputs in terms of the concentration of uses (noise, pollution) and limiting the possible sources of housing land.</p>															

Table 3.22: 22 – Promoting jobs and our local economy

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Draft Policy		O M	+				+				++ M		+	+			
	<p>Interpretation Summary Policy 22 is a new policy that recognises the valued local economy and existing clusters/sectors, and promotes local employment opportunities, drawing out criteria for suitable spaces. It includes support for technology, low carbon and the circular economy linking with climate change. It supports town centre development and sustainable economic growth, promotes active travel and seeks good design. It acknowledges the need for community, voluntary and healthcare uses as part of the policy offer. The supporting text covers last mile deliveries, though this is not a specific policy reference.</p>																
Alt. 1 – No Policy			O M				+				O M		+	O M			
	<p>Interpretation Summary The London Plan provides policy E8 which promotes sector growth in London and recognises the contribution made by outer London areas and / or specific forms of employment that may not be common to the CAZ or town centres (e.g. on account of locational or vocational factors). Whilst the London Plan might provide some of the direction required, it is a strategic policy that doesn't necessarily provide for Richmond specific needs or requirements.</p>														Policy 22 promotes a localised vision for Richmond's sectors which responds to the needs of the borough.	No other effects identified which would require mitigation.	
Alt 2 – Adopted Policy (status quo)																	
	<p>Interpretation Summary The adopted plan does not directly provide a policy for this subject. Therefore, the impact is not relevant.</p>																

Table 3.23: 23 – Offices

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy		O M	O M							O/+ L	+ M	+ M	O M	O L				
	<p>Interpretation Summary Policy 23 strengthens the adopted plan approach by expecting no net loss of office floorspace, while continuing to direct new major office development to the town centres. It acknowledges the of impact of changes to the Use Class Order, and renames Key Office Areas as Key Business Areas (as there is a link with the town and local centres policies above). Objectives 13 and 14 are uncertain because the policy seeks no loss of office floorspace in any location; some office floorspace is outside of locationally preferable locations, and maintaining this may be counter-productive and maintain a dependence on car travel, even though the policy seeks new development in town centres. The restrictive approach may also limit housing opportunities, although permitted development rights may allow some offices to be repurposed away from the most valuable employment area.</p>														Policy 23 is the preferred approach, as it better meets the vision for the borough.	No other effects identified which would require mitigation.		
Alt. 1 – No Policy		O M	O M							O L	O M	O M	O M	O M				
	<p>Interpretation Summary London Plan policy E1 would allow the loss of office floorspace under criteria H, which appears to run against Richmond’s ambitions. Policy E1 is a general policy that deals with proposals to the town centre level, though Richmond’s ambition is one of greater self-sufficiency and the strategic policy may not meet particular local conditions. The policy doesn’t reflect recent changes to PD.</p>																	
Alt 2 – Adopted Policy (status quo)			+ S							O L	+ M	+ M	+ S	+ S				

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	<p>Interpretation Summary The adopted policy LP41 is updated by Policy 23. The policy performs positively by aiming to concentrate offices in the borough's main town centres. Provision of workspace could reduce the need to travel to central London.</p>															

Table 3.24: 24 – Industrial land

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Draft Policy		O M	O M							O/+ L		+ S		++ S		
	<p>Interpretation Summary Policy 24 strengthens the existing approach to expect no net loss, expecting industrial reversion to provide suitable space. It no longer allows for mixed use of just residential and replacing industrial loss with office floorspace as part of redevelopment proposals as this does not address the need. It acknowledges the of impact of the changes to the Use Class Order. Given that some employment areas are not in locations with good public transport options or alternatives to private transport, the outcomes in respect of pollution and active travel are uncertain.</p>															
Alt. 1 – No Policy		O M	O M							O L		O M		O M		
	<p>Interpretation Summary National guidance and the London Plan, through Chapter 6, provide a framework through which local development plans can develop locally relevant strategies. As a strategic policy, the policies do not necessarily meet the needs of Richmond. The London Plan policy pre-dates changes to PD.</p>															
Alt 2 – Adopted Policy (status quo)		O L	+ S							O L	+ S	+ L		++ S		
	<p>Interpretation Summary The adopted policy LP42 is updated by Policy 24. The policy performs positively by aiming to protect industrial land. Provision of workspace could reduce the need to travel to central London, though it may also reduce opportunities for housing land.</p>															
	<p>Policy 24 takes an approach better suited to Richmond based on local evidence and is the preferred strategy for the borough.</p>															No other effects identified which would require mitigation.

Table 3.25: 25 – Affordable, flexible and managed workspace

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Draft Policy		O M	O M								+M	+M	+M	++ S			
	<p>Interpretation Summary Policy 25 expands on the existing approach by protecting existing affordable workspace and requiring affordable workspace on all sites providing more than 1,000sqm employment floorspace. The policy details modern, adaptable affordable workspace that is needed and how this will be secured. The policy responds to the circumstances brought about by the COVID pandemic. Again, protecting existing land in isolated locations brings uncertain outcomes for traffic and pollution.</p>																
Alt. 1 – No Policy		O M	O M								O M			+S	Policy 25 takes an approach better suited to Richmond based on local evidence and is the preferred strategy for the borough.	No other effects identified which would require mitigation.	
	<p>Interpretation Summary Policy E3 of the London Plan requires boroughs to consider the provision of affordable workspaces for specific purposes or groups. The policy requires the specific circumstance of individual boroughs to define how this is implemented. As such, this strategic policy would not necessarily meet the needs of Richmond.</p>																
Alt 2 – Adopted Policy (status quo)			+S								O L	+M	+M	+S	+S		
	<p>Interpretation Summary The adopted policy LP41 is updated by Policy 25. The policy performs positively by aiming to concentrate offices in the borough’s main town centres, though the references to affordable and flexible space are fairly limited. Provision of workspace could reduce the need to travel to central London.</p>																

Table 3.26: 26 – Visitor economy

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy		+	+		O							+	+	+				
		M	M		M							S	S	S				
	<p>Interpretation Summary Policy 26 updates the adopted plan approach reflect London Plan requirements for accessible hotel bedrooms, and the local approach to cultural clusters in the borough. This aims to ensure greater use of active travel (through clustering) and give greater choice to transport modes. Whilst local plan policies can have little impact over hotel water use, greater awareness of climate issues make objective 5 more difficult to assess negatively.</p>														Policy 26 takes an approach suited to Richmond’s attractions and visitor needs, based on local understanding, and is the preferred strategy for the borough. Updated evidence suggests visitor numbers will recover post-pandemic.	No other effects identified which would require mitigation.		
Alt. 1 – No Policy		O	O		O							+	+	+				
		M	M		M							S	S	S				
	<p>Interpretation Summary National guidance and the London Plan both recognise the importance of the tourist and visitor sector to the economy and seek to strengthen and enhance this offer by strengthening and enhancing attractions, access and management. London Plan E10 seeks greater inclusivity from accommodation, and policy HC5 broadly supports cultural and creative industries and the visitor activity this brings. As strategic advice, the London Plan does not offer specific advice for Richmond’s cultural, creative or other visitor / tourism assets, such as Twickenham and the Royal Parks.</p>																	
Alt 2 – Adopted Policy (status quo)		O	O		-							+	+	+				
		M	M		M							S	S	S				

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	<p>Interpretation Summary The adopted policy LP43 is updated by Policy 26. The broadly positive benefits of the policy in attracting spend into the borough and potentially allowing community use of hotel facilities is offset by the uncertainties over the impact on travel (depending on how people access holiday accommodation) and the heavy water use of hotels.</p>															

Table 3.27: 27 – Telecommunications and digital infrastructure

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy							+		+		+	+		+				
	<p>Interpretation Summary Policy 27 recognises the need for enhancing digital infrastructure (reflecting London Plan requirements for new development) while also assessing the potential impacts.</p>														Policy 27 offers a better approach to the issue as it reflects the local circumstances in Richmond.	No other effects identified which would require mitigation.		
Alt. 1 – No Policy							O		+		+	+		+				
	<p>Interpretation Summary National and regional planning policy and guidance supports the expansion of digital and telecommunications infrastructure for economic growth and well-being. It is likely that the London Plan, through policy SI6, would deliver these improvements, though the policy is generic for London and may not reflect the particular built and natural constraints evident in Richmond, such as the built heritage and landscape.</p>																	
Alt 2 – Adopted Policy (status quo)											+	+		+				
	<p>Interpretation Summary The adopted policy LP33 is updated by Policy 27. The provision of improving digital and telecommunication infrastructure should benefit the community at large. Self-certification within the policy secures safeguards.</p>																	

	Addressed in Increasing jobs and helping businesses to grow						
SA Objective	21. Protecting the local economy	22. Promoting jobs and our local economy	23. Offices	24. Industrial land	25. Affordable, flexible, and managed workspace	26. Visitor economy	27. Telecoms and digital infrastructure
Prevent and reduce waste, minimise non-renewable resources							
Reduce pollution, minimise impacts of development	0	0	0	0	0	+	
Reduce reliance on public transport	0	+	0	0	0	+	
Tackle climate emergency							
Adapt to the effect of climate change						0	
Protect and enhance existing habitats							
Promote high quality design and enhance heritage	+	+					+
Protect and enhance parks and open spaces							
Efficient use of land, buildings and infrastructure	+						+
Provide high quality and affordable housing for local needs	0		0/+	0/+			

Promote healthy, safe and inclusive communities	++	+	+		+		+
Enable access to local services and facilities	+		+	+	+	+	+
Increase vitality and viability of town and local centres	++	+	0		+	+	
Promote sustainable economic growth and employment opportunities	++	+	0	++	++	+	+

3.7 Protecting what is special and improving our areas (heritage and culture)

3.7.1 This policy theme concentrates on protecting the borough’s exceptional historic and cultural environment that is central to its character. It seeks to ensure that this happens by ensuring new development takes a design-led approach sensitive to an areas’ character, giving consideration to heritage assets, views and vistas, archaeology and the Royal Botanic Gardens, Kew World Heritage Site. Policies 28 – 33 have been measured against the appraisal framework in this section.

Table 3.28: 28 – Local character and design quality (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Draft Policy	+	+	++	+	+	+	++	+	++		++	+	++			
	M	M	S	S	M	L	M	S	M		M	S	S			
	<p>Interpretation Summary Policy 28 takes forward the existing approach into broader strategic policy, linked to the Urban Design Study and achieving design quality and improved place-making. It has an enhanced range of policy criteria that address issues such as microclimate and the design-led approach advocated very recently by the Government. The policy also takes a pro-active approach to access, permeability, crime and safety and urban greening.</p>														Given the additional evidence collected through the Urban Design Study, Policy 28 provides the most responsive approach to architectural and design quality and is the preferred approach.	Legislation also exists around historic buildings and other heritage assets. No other effects identified which would require mitigation.
Alt. 1 – No Policy	+	+	+	+	+	+	O	+	+		++	+	+			
	L	L	M	S	M	L	M	S	M		M	S	S			
	<p>Interpretation Summary There is a new emphasis on design quality and beauty emerging from national guidance through the NPPF and associated guidance. The London Plan also creates a very strong steer through its Good Growth, Design and Heritage policies on the importance of bringing forward development that is responsive to local identity and character whilst delivering identified development needs. This, however, remains a strategic policy, and does have some gaps in relation to Richmond’s specific needs and characteristics that could produce some uncertain outcomes, particularly in relation to issues raised by the Urban Design Study.</p>															

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Alt 2 – Adopted Policy (status quo)				+	+		++		++			+	++				
	<p>Interpretation Summary The adopted policy LP1 is updated by Policy 28. The policy was assessed as having a very positive impact upon many aspects of the built environment, including aesthetics, energy, best use of land and heritage.</p>																

Table 3.29: 29 – Designated heritage assets

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy	+			+			++		O				++	+				
	L			L			S		L				S	M				
	<p>Interpretation Summary Policy 29 provides minor updates to existing approach, including in response to climate change and the latest on updating Conservation Area Appraisals. The policy picks up on re-use as a way of reducing waste and utilising existing resources and discusses a ‘whole house approach’ as a means of understanding energy use. Strict policy efforts to resist demolition, loss, harm or inappropriate uses may mean buildings remain unused for long periods, which has uncertain outputs for Objective 9.</p>														Policy 29 acknowledges and expands more strategic guidance, particularly that in respect of environmental concerns (particularly waste and energy). This is the preferred approach.	Historic England provide statutory advice, and development proposals are also required to conform to Conservation Area Appraisals and similar relevant material.		
Alt. 1 – No Policy							++						++	+				
							S						S	M				
	<p>Interpretation Summary National planning policy and the London Plan recognise the value inherent in the historic environment and in designated historic assets, but only provide a very general framework for development decisions. A wider and more specific framework is defined by legislation and maintained by Historic England, who provide specialised advice and support on matters of heritage importance. It is likely that this guidance would bring significant protection to designated heritage assets.</p>																	
Alt 2 – Adopted Policy (status quo)							++						++	+				
							S						S	M				
	<p>Interpretation Summary The adopted policy LP3 is updated by Policy 29. The policy is wholly positive in its aim to protect designated heritage assets including listed buildings, war memorials, Scheduled Ancient Monuments and historic Parks and Gardens. Protecting these assets also assists with the borough’s economy in terms of tourism.</p>																	

Table 3.30: 30 – Non-designated heritage assets

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14					
Draft Policy							++ S							+	+				
	<p>Interpretation Summary Policy 30 provides minor updates to the existing approach, including a reference to locally listed historic parks and gardens.</p>														Policy 30 provides a more certain approach to protecting heritage assets that are not formally designated. This is the preferred approach.	Advice and mitigation strategies can come from a good working relationship with Historic England and others, and through Conservation Area Appraisals and similar relevant material.			
Alt. 1 – No Policy							+							+			+		
	<p>Interpretation Summary National and regional policy focuses on the retention and importance of designated assets, but acknowledge the role that non-designated assets bring to local character and identity (indeed, some non-designated assets may become designated). It is likely that non-designated assets would have some weight under strategic policy, but gaps are likely to be present in respect of local needs.</p>																		
Alt 2 – Adopted Policy (status quo)							++ S							+			+		
	<p>Interpretation Summary The adopted policy LP4 is updated by Policy 30. The policy is wholly positive in its aim to protect non-designated heritage assets including locally listed buildings and local historic features (e.g. blue plaques, statues, cattle troughs, phone boxes). Protecting these assets may also assist with the borough’s economy in terms of tourism, and contributes to the borough’s finer grain character attributes.</p>																		

Table 3.31: 31 – Views and Vistas

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14					
Draft Policy							++ S	+ L	-/O S										
	<p>Interpretation Summary Policy 31 provides minor updates to existing approach, including links with Urban Design Study and additional local views. Further work on the Local Views SPD, combined with a more targeted approach in the wording of the policy and expectations of developers, may mean land can be used for development more efficiently, but the outcome remains uncertain.</p>																		
Alt. 1 – No Policy							- S	- S	O/+ M										
	<p>Interpretation Summary National policy is relatively silent on views and vistas, and the London Plan addresses strategic views as they affect Greater London (Policy HC3 / HC4). Local views are largely defined by local plans. Without this local dimension, the absence of a policy could not rely on strategic guidance. This could be detrimental to valued local views and the heritage/ character assets that rely on those protections. Some land may become free of restrictions placed upon it, which might open up land but also undermine character.</p>																		
Alt 2 – Adopted Policy (status quo)							++ S	+ L	- S										
	<p>Interpretation Summary The adopted policy LP5 is updated by Policy 31. The policy is assessed as having positive benefits for the townscape and heritage of the area, protecting key views and reinforcing the borough’s character. Such designations may impact on the use of land and could compromise the development of some sites.</p>																		
																		Policy 31 protects locally important views which might otherwise be lost to development, undermining some of the character of Richmond. Policy 31 is the preferred approach.	Accurate Visual Representations are sought with Townscape Heritage Impact reports. No other effects identified which would require mitigation.

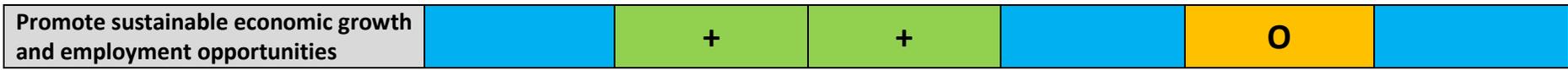
Table 3.32: 32 – Royal Botanic Gardens, Kew World Heritage Site

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14					
Draft Policy							++ S	++ L		O S		+ S		O S					
	<p>Interpretation Summary Policy 32 provides minor amendments to the existing approach. Objectives 10 and 14 are uncertain; the previous SA regarded the negative impact as minimal, and owing to the high value of the Kew site and its buffer, the broad benefits of its protection are likely to outweigh any disbenefit across a relatively small area that incorporates the buffer.</p>														The London Plan requires a policy within the Richmond Local Plan. Policy 32 meet this requirement and is the preferred strategy.	The local plan policy refers to both the Kew World Heritage Management Plan and the Royal Botanic Gardens, Kew Landscape Master Plan.			
Alt. 1 – No Policy							++ S	+ L				+ S							
	<p>Interpretation Summary National planning guidance and the London Plan recognise the role and importance of World Heritage Sites, and the London Plan directs Richmond to contain a specific policy in its Local Plan. The Richmond Plan would not conform with the London Plan without a local policy.</p>																		
Alt 2 – Adopted Policy (status quo)							++ S	+ L		- S		+ S		- S					
	<p>Interpretation Summary The adopted policy LP6 is brought forward by Policy 32. The policy was assessed as positive in terms of protecting a park and a World Heritage Site, which supports both the economy and visits from local people and tourism. It was assessed negatively because of the possible impact on housing opportunities and commercial development.</p>																		

Table 3.33: 33 – Archaeology

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy							++ M		O M									
	<p>Interpretation Summary Policy 33 provides minor amendments to the existing approach to reflect forthcoming updated ‘tiered’ APAs. The policy is focused on protecting the borough’s heritage assets, and performs positively in relation to objective 7. Like other restrictive policies, the possible restriction to the use of land could limit possible sites for development.</p>														Policy 33 ensures that Richmond’s archaeological assets are identified and protected in accordance with the London Plan. The local plan policy ensures that decisions can be made effectively at the local level, and this is the preferred strategy.	Strategic support in respect of archaeological assets is available from the Greater London Archaeological Advisory Service and others.		
Alt. 1 – No Policy							++ M		O M									
	<p>Interpretation Summary National planning advice and the London Plan recognises the value of archaeological assets alongside other designated heritage assets and looks to ensure that these are predicted, identified and understood ahead of development proposals being determined. Archaeological Priority Areas are identified strategically and are reviewed across London from time to time. In the absence of a policy, archaeological assets would likely be protected.</p>																	
Alt 2 – Adopted Policy (status quo)																		
	<p>Interpretation Summary The adopted policy LP7 is brought forward by Policy 33. It was assessed as neutral across all SA objectives.</p>																	

	Addressed in Protecting what is special and improving our areas					
SA Objective	28. Local character and design quality	29. Designated heritage assets	30. Non-designated heritage assets	31. Views and Vistas	32. Royal Botanic Gardens, Kew World Heritage Site	33. Archaeology
Prevent and reduce waste, minimise non-renewable resources	+	+				
Reduce pollution, minimise impacts of development	+					
Reduce reliance on public transport	++					
Tackle climate emergency	+	+				
Adapt to the effect of climate change	+					
Protect and enhance existing habitats	+					
Promote high quality design and enhance heritage	++	++	++	++	++	++
Protect and enhance parks and open spaces	+			+	++	
Efficient use of land, buildings and infrastructure	++	0		-/0		0
Provide high quality and affordable housing for local needs					0	
Promote healthy, safe and inclusive communities	++					
Enable access to local services and facilities	+				+	
Increase vitality and viability of town and local centres	++	++	+			



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

3.8.1 This policy theme focuses on the greenspaces of the borough, seeking to protect areas of important open and green space (including strategic green spaces such as green belt and Metropolitan Open Lane and local greenspaces important to neighbourhoods). It also looks to address river and woodland environments and moorings on our rivers. Policies 34 – 43 have been measured against the appraisal framework in this section.

Table 3.34: 34 – Green and Blue Infrastructure (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14					
Draft Policy			+		++	++	++	++	-/O	-	+	++		+					
			M		S	S	S	S	M	S	S	S		S					
	<p>Interpretation Summary Policy 34 protects and enhances the multi-functional green and blue infrastructure, ensuring it is maintained and sets the strategic links with its role related to biodiversity, urban greening and climate change as well as outreach and education. It builds on adopted policy LP12 by recognising and seeking to improve and enhance elements of green space that bring wider benefits, such as active travel. Protection inevitably limits land choices for meeting development needs, particularly as non-designated sites are also considered in respect of their biodiversity potential.</p>														Policy 34 brings the consideration of blue and green infrastructure together and seeks to protect and enhance it whilst recognising wider benefits associated with it. It represents the preferred approach.	The range of open spaces in the borough means wide stakeholder involvement and a broad experience can be brought to green / blue infrastructure management.			
Alt. 1 – No Policy			O		+	++	+	++	O			+							
			M		S	S	S	S	M			S							
	<p>Interpretation Summary National and regional planning policy and guidance recognises the importance of protecting, maintaining and enhancing green and blue infrastructure for a range of reasons, including recreational amenity, biodiversity, health and well-being and in recognition of a place’s character and identity. Alongside London Plan policies G1, G4 and S114, the Mayor offers a range of guidance for green / blue infrastructure through supplementary advice. In the absence of local policy, strategic policy would offer many of the protections and initiatives that would protect, enhance and maintain green / blue infrastructure. Within the London Plan, green and blue infrastructure are dealt with independently.</p>																		

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Alt 2 – Adopted Policy (status quo)					+	++	+	++				++		+			
	<p>Interpretation Summary The adopted policy LP12 is brought forward by Policy 34, though it dealt solely with green infrastructure (it does not mention ‘blue infrastructure’). The policy was assessed positively in respect of its impact on reducing flood risk, improving biodiversity, providing linkages between places and improving landscape and townscape settings. Each of these things benefits the health and well-being of citizens.</p>																

Table 3.35: 35 – Green Belt, Metropolitan Open Lane and Local Green Space

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14					
Draft Policy	+	+			+	+	+	+	+	O		++		O					
	S	S			S	S	S	M	S	M		L		M					
	<p>Interpretation Summary Policy 35 continues the strong protection of the Borough’s designated open spaces and adds into policy the encouragement for improvements or enhancements to landscape quality (including visual amenity), biodiversity (including delivering biodiversity net gain) and accessibility. One site has been removed from MOL, with two other minor changes to MOL boundaries; there are 6 proposed new Local Green Space designations. Whilst development land may be more restricted, combined with an emphasis on better design and creative solutions, housing and commercial needs could be met more creatively whilst protecting the open and green character of the borough. The policy minimises the use of greenfield land, which is effectively a non-renewable resource.</p>														Policy 35 protects important open land and amenity space in line with the London Plan, and seeks to ensure that it contributes through its use to the local objectives within Richmond. This is the preferred strategy.	No other effects identified which would require mitigation.			
Alt. 1 – No Policy						+	+	+				+							
						S	S	M				L							
	<p>Interpretation Summary The London Plan Policy G2 protects London’s green belt and MOL in line with national expectations set out in national guidance.</p>																		
Alt 2 – Adopted Policy (status quo)		+			+	+	+			-		++		-					
		S			S	S	S			M		L		M					
	<p>Interpretation Summary The adopted policy LP13 is brought forward by Policy 35. The policy was assessed favourably for its protection of open land and landscape, and for the positive social benefits this brings in terms of health, well-being and recreation. It was assessed negatively for its impact on opportunities to develop housing and commercial opportunities, because of the restriction to the choice of sites.</p>																		

Table 3.36: 36 – Other Open Land of Townscape Importance (OOLTI)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy		+				++	++	++		O				O				
	<p>Interpretation Summary Policy 36 continues the protection of designated OOLTI and while recognising the changes to PD rights, provides opportunity to encourage measures to restore spaces in terms of their quality, character and biodiversity net gain. These build upon the adopted policy, improving its clarity. Whilst limiting land choices for development, protecting important spaces looks for more creativity from available land and maintains the character of the borough.</p>														Policy 36 protects from development those open spaces deemed to be valuable in townscape terms. As the London Plan offers no similar protection for such spaces, Policy 36 is the preferred strategy.	Some identified spaces may have additional protection as part of a designated heritage asset, or be recognised in the Urban Design Study.		
Alt. 1 – No Policy						-	-	-	O	O		O						
	<p>Interpretation Summary Whilst the value of open space is recognised at a national and pan-London level, the OOLTI designation is not set out as a strategic priority. A ‘no policy’ approach would likely have detrimental outcomes to the character and identity of the borough and may damage valued environments.</p>																	
Alt 2 – Adopted Policy (status quo)		+				+	++	+		-				O				
	<p>Interpretation Summary The adopted policy LP14 is brought forward by Policy 36. The policy was positively assessed for its impact upon green spaces and biodiversity, but the protection of such land could restrict opportunities for development of housing and other uses.</p>																	

Table 3.37: 37 – Public Open Space, play, sport and recreation

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy						O L		++ S	+ M		++ S	++ S						
	<p>Interpretation Summary Policy 37 continues the existing Local Plan approach, recognising importance of open spaces for biodiversity and climate change, and refers to the GLA’s child yield calculator. The updated policy refers to the relocation of playing fields. The policy also adds new elements aimed at improving nature conservation and biodiversity elements, engaging young people in the design of play space and securing planning obligations. The supporting text refers to making the best use of new and existing playing fields and pitches, and to the use of artificial grass pitches to enable this.</p>														Policy 37 provides a policy that is able to respond to the particular needs and shortcomings that exist in Richmond. This is the preferred approach.	A review of open space provision was completed in 2023, with a review of sports provision ongoing. Further strategic guidance is available through the GiGL tool. No other effects identified which would require mitigation.		
Alt. 1 – No Policy							++ S			++ S	+ S							
	<p>Interpretation Summary National and regional planning policy and guidance recognises the importance of protecting, maintaining and enhancing open space and play pitches for a recreational amenity and health and well-being. The London Plan includes several policies to meet this aim, including G4, S4 and S5. Whilst this provides a strategic framework to consider these matters, this is unlikely to provide for specific needs within Richmond.</p>																	
Alt 2 – Adopted Policy (status quo)							++ S			+ S	++ S							
	<p>Interpretation Summary The adopted policy LP31 is brought forward by Policy 37. The policy was assessed positively on account of its protection of open space and recreational facilities, and for the contribution made to health and well-being given the availability of such spaces.</p>																	

Table 3.38: 38 – Urban Greening

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy		++ S		++ M	++ S	++ S	+ S	++ S	+ S		+ M	+ S						
	<p>Interpretation Summary Policy 38 is a new policy to reflect the adopted London Plan’s Urban Greening Factor on major developments. It goes well beyond the existing adopted approach and seeks to include appropriate greening into development with a view to tackling the climate emergency, biodiversity needs, carbon storage and water management alongside improving social indicators such as well-being and mental health. The approach reflects the London Plan policy.</p>														Policy 38 meets the requirements of the London Plan for urban greening, but also brings forward existing ideas around green walls, and links this to the overall vision for the borough. This is the preferred strategy.	No other effects identified which would require mitigation.		
Alt. 1 – No Policy		++ S		++ M	++ S	++ S			+ S		+ M							
	<p>Interpretation Summary The London Plan covers Urban Greening in Policy G5, but for major development only. Green roofs and green walls are covered in the urban greening policy, but elsewhere in the plan, green walls and green roofs are encouraged in smaller developments where they can assist with green networks, biodiversity, food growing and other environmental benefits.</p>																	
Alt 2 – Adopted Policy (status quo)		+ S		+ S	+ S	+ S	+ S	+ S	+ S		+ M	+ S						
	<p>Interpretation Summary The adopted policy LP17 is incorporated into policy 38 as it contains the existing policy approach to green roofs and walls, and expects incorporation of urban greening on all small sites, recognising wider links to biodiversity and climate change (including flooding and sustainable construction).</p>																	

Table 3.39: 39 – Biodiversity and geodiversity

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Draft Policy		+		+	++	++	++	++	O		+	+	+				
		S		L	S	S	S	S	L		L	S	L				
	<p>Interpretation Summary Policy 39 continues protecting the borough’s biodiversity (a review of sites designated for nature conservation importance in the borough has been undertaken) with updated mitigation hierarchies and increased emphasis on including the connection between habitats and importance of wildlife / ecological corridors, with a specific policy requirement for at least 20% contribution to delivering measurable biodiversity net gain. The policy highlights dark spaces, protects residential gardens and seeks to provide proportionately sized green corridors in developments. It brings in protection for geodiversity, which the adopted plan did not mention. Criteria for protecting bio/geodiversity are widened and the possibility for translocation prior to compensation is recognised as an option when determining development proposals. Objective 9 is uncertain because the policy does restrict some land from coming forward for development that may have otherwise been available.</p>														Policy 39 protects and enhances the borough’s biodiversity and geodiversity in the context of local evidence and the London Plan, and draws upon local evidence including the Richmond BAP. This is the preferred strategy.	The Mayor has produced a guide on design for biodiversity net gain, and the plan seeks adequate and robust information with planning applications. No other effects identified which would require mitigation.	
Alt. 1 – No Policy		+		+	+	+	++	O	O								
		S		L	S	S	S	L	L								
	<p>Interpretation Summary National guidance recognises the benefits of protecting and enhancing areas that contribute to a place’s biodiversity and London Plan Policies G6 and G9 provide a basis and a framework for doing this. Whilst providing guidance and direction, the policy also instructs local authorities to incorporate local strategies into their plans based on local evidence. Whilst providing a strategic framework, some needs within Richmond are not met.</p>																
Alt 2 – Adopted Policy (status quo)		+				++	++	++	O	O	+	+	+				
		S				S	S	S	L	L	L	S	L				

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	<p>Interpretation Summary</p> <p>The adopted policy LP15 is brought forward by Policy 39. The policy was assessed positively for its impact on biodiversity and green spaces, and the possible impact on reducing the choice of land for development is mitigated by the possible incorporation of green features. A positive impact was assessed for town centres, particularly in terms of the possibility for street trees.</p>															

Table 3.40: 40 – Rivers and river corridors

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy		O M	+ M		++ L	+ S	+ S	+ M	+ L		+ L	+ S		+ S				
	<p>Interpretation Summary Policy 40 maintains the protection of the historic, environmental and natural qualities of the borough’s water bodies in a similar manner to the existing policy. It promotes public access and protects river related industry and water dependent uses. In all senses, the policy seeks to find a balance between human and non-human needs and, as a result, tries to bring some benefits for each. There is a question over maintaining river related industry by the riverside if it has an environmental impact, though clearly river related industry is best located on the river, rather than away from it (Objective 2). The policy encourages attractive riverside walks and access, which can promote active travel (Objective 3). Objective 10 is neutral, given riverside areas are protected as MOL.</p>														Policy 40 develops a strategy for the rivers in Richmond based on the local context, where the river is further inland and varied in its use and utilisation. Whilst fitting into the general London Plan strategy, the preferred strategy is policy 40.	River related development has to call on multiple agencies in order to properly manage it, and overarching river-related strategies exist alongside the Local plan.		
Alt. 1 – No Policy		O M	O M		++ L	+ S	+ S	+ M										
	<p>Interpretation Summary London Plan Policy S114 deals with the strategic role of London’s waterways and looks to local authorities to develop strategies to manage these alongside partners and neighbouring authorities where necessary. The Plan also contains policies that variously deal with water transport and river related activities. Whilst this broad strategy might address some of Richmond’s river related issues, there would remain gaps.</p>																	
Alt 2 – Adopted Policy (status quo)					+ L	+ S	+ S	+ M	+ L	- M	+ L	+ S		+ S				
	<p>Interpretation Summary The adopted policy LP18 is brought forward by Policy 40. The policy generally scores positively against SA objectives for its recognition of the river both as a recreational and open resource contributing to the borough’s character and identity and because of its</p>																	

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	protection of the river as a functioning element of Richmond's life in terms of life and livelihood. It scores negatively in terms of housing because it limits the use of land close to the river, though this is protected as MOL in any event.															

Table 3.41: 41 – Moorings and floating structures

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy		+				++	+	+		-		+						
		S				S	S	M		M		S						
	<p>Interpretation Summary Policy 41 provides clarification to improve and protect the open character, views and heritage of the waterways, and emphasise that new moored vessels would only be supported for river-related uses. This is similar to the adopted approach and doesn't noticeably improve upon the adopted policy in terms of the SA objectives, though replacement houseboats are a new element. A negative impact is noted in Objective 10, and whilst the policy does limit opportunity for additional houseboats, this was never likely to be a significant source of high quality or affordable housing that contributed to meeting needs within the borough.</p>														Policy 41 reflects specific conditions in respect of the waterways within the borough, which may be distinct from other places in London. Policy 41 is the preferred approach in these circumstances.	No other effects identified which would require mitigation.		
Alt. 1 – No Policy						O	O	O		-/O								
						M	M	M		M								
	<p>Interpretation Summary Policy SI16 of the London Plan provides some strategic advice and guidance in respect of houseboats and moorings, and refers to work done by the Canal and River Trust. This advice does not relate to Richmond's specific circumstances and therefore may have gaps.</p>																	
Alt 2 – Adopted Policy (status quo)		+				+	+	+		-		+						
		S				S	S	M		M		S						
	<p>Interpretation Summary The adopted policy LP19 is brought forward by Policy 41. The policy was assessed positively against those objectives that seek to protect natural and river assets and the social benefits gained from access to the river. The policy does restrict new houseboats.</p>																	

Table 3.42: 42 – Trees, woodland and landscape

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Draft Policy		++ S	O M		++ S	++ S	++ S	+ S				++ L	O L				
	<p>Interpretation Summary Policy 42 continues the protection of existing trees and requirements for new trees in development, with increased emphasis on the broader value of trees and links with biodiversity, air quality and climate change mitigation and adaptation. The policy seeks long term management and maintenance proposals. Improvements to green route networks may be possible.</p>																
Alt. 1 – No Policy					++ S	++ S	O L	O M									
	<p>Interpretation Summary The London Plan includes a strategic policy, G7, protecting trees and woodlands and the encouragement of further planting in new developments. National guidance is also vocal about the value of trees in urban and more natural environments. However, these policies are strategic, and lack local knowledge needed to maintain and protect the wooded environment within Richmond.</p>																
Alt 2 – Adopted Policy (status quo)		+ S			+ S	+ S	++ S	+ S				++ L	O L				
	<p>Interpretation Summary The adopted policy LP16 is brought forward by Policy 42. The policy was assessed positively for its impact in maintaining trees, either in their own right or as part of wider recognised open spaces or networks. Their value in contributing to the streetscene and to the community’s well-being is acknowledged. Trees are considered to benefit the vitality of the borough’s centres.</p>																
															Policy 42 responds to strategic and national advice about trees, but also links local considerations and wider environmental objectives into the policy. This is the preferred approach.	The Council intends to produce a Tree Planting Strategy. No other effects identified which would require mitigation.	

Table 3.43: 43 – Floodlighting and other external artificial lighting

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14					
Draft Policy		O S		O S		-/O S	+		+		+	+		+					
	<p>Interpretation Summary Policy 43 considers the demonstrable harm of floodlighting (such as light pollution and any impact on habitats) and the need to balance with positive benefits (such as making places safe or enabling sports and recognising potential for positive benefits around safety / security). The revised policy specifically recognises that a balance needs to be found between competing interests, which may lead to the use of technology that can better address these more ably, or reduce the impact of energy use or pollution (Objectives 2 and 4). Lighting the borough’s built assets at night is likely to increase awareness and the value of them (Objective 7).</p>														Policy 43 brings together a number of aspects around lighting in Richmond into one policy. This is the preferred strategy.	In terms of biodiversity and the role of darkness, the policy requires applicants to submit a statement to justify why the proposed external lighting is required for its intended use. Applicants should have regard to Guidance Note 1 for the Reduction of Obtrusive Light produced by the Institute of Lighting Professionals			
Alt. 1 – No Policy	+	+					O	O			O	O							
	<p>Interpretation Summary The London Plan provides some sporadic guidance on lighting (tall buildings, sports facilities and in respect of aspects of design – safety, movement) and some warnings against light pollution, but no coherent overall policy.</p>																		
Alt 2 – Adopted Policy (status quo)		O S		- S		- S			+		+	+		+					
	<p>Interpretation Summary The adopted policy LP9 is brought forward by Policy 43. The policy is assessed positively where the use of floodlighting can ensure that facilities are available for use beyond dark. People can benefit both from these facilities, and from a feeling of safety in a well-lit</p>																		

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	environment. The use of lighting, however, requires energy, and can disturb wildlife. The policy acknowledges that smart lighting could mitigate this negative impact.															

	Addressed in Increasing biodiversity and the quality of our open spaces									
SA Objective	34. Green and Blue Infrastructure	35. Green Belt, MOL and local green space	36. OOLTI	37. Public open space, play sport & recreation	38. Urban Greening	39. Biodiversity and Geodiversity	40. Rivers & River Corridors	41. Moorings, floating structures	42. Trees woodlands landscape	43. Flood-lighting
Prevent and reduce waste, minimise non-renewable resources		+								
Reduce pollution, minimise impacts of development		+	+		++	+	O	+	++	O
Reduce reliance on public transport	+						+		O	
Tackle climate emergency					++	+				O
Adapt to the effect of climate change	++	+			++	++	++		++	
Protect and enhance existing habitats	++	+	++	O	++	++	+	++	++	-/O
Promote high quality design and enhance heritage	++	+	++		+	++	+	+	++	+

Protect and enhance parks and open spaces	++	+	++	++	++	++	+	+	+	
Efficient use of land, buildings and infrastructure	-/0	+		+	+	0	+			+
Provide high quality and affordable housing for local needs	-	0	0					-		
Promote healthy, safe and inclusive communities	+			++	+	+	+			+
Enable access to local services and facilities	++	++		++	+	+	+	+	++	+
Increase vitality and viability of town and local centres						+			0	
Promote sustainable economic growth and employment opportunities	+	0	0				+			+

3.9 Improving design, delivering beautiful buildings and high-quality places

3.9.1 This policy theme looks to ensure that design and amenity standards are high, and that development proposed in the borough is of a high design quality. This reflects the Government’s desire to ensure that new buildings are beautiful and are fit for purpose. Building on the Urban Design Study, this theme also seeks to ensure that tall buildings are focused in the right places, where the need for development is high and sensitivity is low.. Policies 44 – 46 have been measured against the appraisal framework in this section.

Table 3.44: 44 – Design Process

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation					
	1	2	3	4	5	6	7	8	9	10	11	12	13	14							
Draft Policy	+	+	+	+	+	+	++	+	++	+	++	+	+	+	M	M	M	M	M		
	<p>Interpretation Summary Policy 44 is a new policy to reflect the Government and London Plan emphasis on a design-led approach, setting out the tools to assess good design through the planning process including the role of design review. Whilst the policy defines a process, that process is specifically geared towards achieving the positive outcomes demanded of policies and defined by the SA objectives. For this reason, the policy has been assessed positively almost across the board against the SA objectives. It rates higher for Objectives 7, 9 and 11 because of its emphasis on making the best use of land, promoting a design-led approach, involving communities including those less frequently heard and underrepresented groups in the design process, and fire safety.</p>														Whilst Policy 44 would achieve similar outcomes to strategic advice, it contains locally specific requirements (such as referral to the DRP) which make it the preferred strategy.	Design is an increasingly important element of development decisions and Richmond can draw on the DRP, and will need to adapt as new and recent design advice takes further shape. Major applications will be required to be accompanied by a Statement of Community Involvement. The					
Alt. 1 – No Policy	+	+	+	+	+	+	+	+	+	+	+	+	+	+	M	M	M	M	M		
	<p>Interpretation Summary National policy has recently shifted to encourage a greater emphasis on design and beauty, reflected in the emerging White Paper and the development of a National Model Design Code. The London Plan echoes this strong design emphasis, including at policies D3 and D4, and offers relatively prescriptive means for achieving this. It is expected that even without a localised policy, the prescriptive and detailed nature of this strategic advice would deliver similar results. There are minor gaps as a result of the advice being strategic.</p>																				

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Alt 2 – Adopted Policy (status quo)																		
	Interpretation Summary The adopted plan does not directly provide a policy for this subject. Therefore, the impact is not relevant.																	

Table 3.45: 45 – Tall and Mid-rise Building Zones

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14						
Draft Policy		+	+			+	+		++	O	+		++	+						
		S	S			S	S		M	M	S		M	M						
	<p>Interpretation Summary Policy 45 provides an updated policy approach to respond to the London Plan requirements, and links with the Urban Design Study (2021) identifying tall and mid-rise zones. The approach is design-led, so seeks to take opportunities for taller buildings bearing in mind the constraints that may exist (including the built context and heritage assets). Enabling taller buildings can reduce the need to travel and make the best use of land, avoiding recognised assets. Taller buildings can provide housing accommodation and accommodate a mix of uses. Explicitly references fire safety and the need to provide two staircases for developments over 30 metres in height.</p>														Policy 45 provides the detailed guidance required to direct and determine tall building proposals, and is the preferred strategy.	Tall buildings remain a contentious matter. Design advice, design codes and the design review process can help to determine proposals.				
Alt. 1 – No Policy		+				O	O		O		+		+	O						
		S				M	M		M		M		M	M						
	<p>Interpretation Summary The London Plan provides strategic guidance for tall buildings at D9, and sets out both the process that local authorities should undertake to define appropriate locations for tall buildings and some of the factors to take into account when determining proposals. As a strategic guide, the policy does not meet the needs of Richmond specifically. In this scenario, the policy would provide uncertain outcomes against some criteria because the detailed elements of tall building locations and heights would not be defined.</p>																			
Alt 2 – Adopted Policy (status quo)							++		++	-	+		++							
							S		S	S	S		S							
	<p>Interpretation Summary The adopted policy LP2 is brought forward by Policy 45. However, the existing policy is a much simpler policy than the revised policy. It was assessed positively on account of its requirement to assess proposals for tall buildings based on the local context and character, and would bring</p>																			

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	benefits for townscape and the best use of land, but having a negative impact on providing homes by limiting height.															

Table 3.46: 46 – Amenity and Living Conditions

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy		++ M					++ M		+		++ S	++ M						
	<p>Interpretation Summary Policy 46 updates the policy approach, and particularly recognises the adopted London Plan approach to mitigating design features to ensure privacy. The approach is very similar to the adopted plan, and brings a similar assessment, though further consideration of outlooks and visual amenity in particular should ensure that development does use land and buildings most effectively.</p>														Policy 46 echoes many requirements set out in the London Plan, but enables a local perspective of design and amenity and is the preferred approach.	Further guidance is set out in the Council’s SPDs relating to design.		
Alt. 1 – No Policy		++ M					++ M				++ S	++ M						
	<p>Interpretation Summary Design has become an important element of national and London planning policy guidance. Policy D6 of the London Plan deals with some of the elements of quality and standards for living space, including daylight and sunlight and private internal space. Combined with other design policies, it is anticipated that the absence of a policy in the Richmond Plan would not result in significant issues.</p>																	
Alt 2 – Adopted Policy (status quo)		++ M					++ M				++ S	++ M						
	<p>Interpretation Summary The adopted policy LP8 is brought forward by Policy 46. The policy was assessed as positive for its impact on neighbouring properties and associated benefits around townscape, cohesive communities and well-being.</p>																	

	Addressed in Improving design, delivering beautiful buildings and high-quality places		
SA Objective	44. Design Process	45. Tall and mid-rise building zones	46. Amenity and living conditions
Prevent and reduce waste, minimise non-renewable resources	+		
Reduce pollution, minimise impacts of development	+	+	++
Reduce reliance on public transport	+	+	
Tackle climate emergency	+		
Adapt to the effect of climate change	+		
Protect and enhance existing habitats	+	+	
Promote high quality design and enhance heritage	++	+	++
Protect and enhance parks and open spaces	+		
Efficient use of land, buildings and infrastructure	++	++	+
Provide high quality and affordable housing for local needs	+	O	
Promote healthy, safe and inclusive communities	++	+	++
Enable access to local services and facilities	+		++
Increase vitality and viability of town and local centres	+	++	
Promote sustainable economic growth and employment opportunities	+	+	

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

3.10.1 This policy theme focuses on travel and transport. It looks to ensure that the most appropriate choices are made for travel, so focusing on making active travel – walking and cycling – easier and available. The theme also looks at parking standards and servicing for a wide range of development, seeking to meet the needs of businesses, town centres and others. Policies 47 – 48 have been measured against the appraisal framework in this section.

Table 3.47: 47 – Sustainable Travel Choices (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy		+	++	+					+		++	++	++					
		S	S	S					S		S	S	M					
	<p>Interpretation Summary Policy 47 reflects the adopted London Plan, the Mayor’s Transport Strategy and the Council’s Active Travel Strategy, increasing emphasis on walking and cycling for short journeys, on inclusive mobility and on assessing the impact of developments on the road network. This uses a threshold approach linked to development size as to whether a separate Transport Statement or Transport Assessment is required for different types of uses. The policy amplifies the requirements of developments in making active and accessible travel the priority, and makes more of other forms of transport, including the potential of the river and the need to accommodate taxis and private hire vehicles.</p>														Whilst the London Plan provides a comprehensive approach to sustainable and active travel, Policy 47 provides a Richmond focused approach and is the preferred strategy.	No other effects identified which would require mitigation.		
Alt. 1 – No Policy		+	+	+					+		++	++	O					
		S	S	S					S		S	S	M					
	<p>Interpretation Summary Encouraging and enabling sustainable and active travel is a key objective of national planning guidance (Chapter 9 in the NPPF) and London Plan (Chapter 10). The London Plan sets out a strategic framework for London authorities in Policy T1 – T4, which includes a list of major transport initiatives across London to improve transport choice. Policy T4 provides a structure for assessing and mitigating transport impacts. The structure does not provide advice for Richmond specifically and so minor gaps may exist leading to uncertainty.</p>																	

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Alt 2 – Adopted Policy (status quo)			+								+	+	+			
	<p>Interpretation Summary The adopted policy LP44 is brought forward by Policy 47. The policy was assessed positively for its impact on enhancing accessibility and promoting different forms of travel, including cycling and walking, and for benefits this may bring to health and well-being.</p>															

Table 3.48: 48 – Vehicular Parking, cycle parking, servicing and construction logistics management

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Draft Policy		O M	+ S				+ M		+ S	O L	O M	O L	O M				
	<p>Interpretation Summary Policy 48 reflects the adopted London Plan vehicle and cycle parking standards. It adopts a threshold approach linked to development size for whether future occupants will be excluded from a CPZ, for when an on-street vehicular parking stress survey is needed and for when a construction management plan is required. It includes private vehicular crossovers to a former front garden, car-free development, and car clubs, recognising changes in approach and attitude and so responding well to the reduction of the reliance upon private transport (Objective 3). Whilst needing to accommodate the car, the policy should promote creative design and look to be efficient in the use of land (Objectives 7 and 9), and pushes for greater inclusivity in active travel modes. However, whilst cars remain a dominant form of transport, some outcomes remain uncertain.</p>														Policy 48 reflects the London Plan approach, but also provides further advice on aspects of traffic management relevant to Richmond’s context. It is the preferred strategy.	As an outer London borough with high car ownership and some areas with limited transport alternatives, the impact on the built environment will need careful monitoring.	
Alt. 1 – No Policy		O M	O M				O M		+ S	O L	O M	O L	O M				
	<p>Interpretation Summary National and London planning policy and guidance recognise the balance required to be found in both providing and limiting parking, and the impact that parking provision can have on design and access. The London Plan provides a comprehensive approach to standards, with a series of policies at T6, and standards for cycling and deliveries set out at T5 and T7. However, the London Plan provides not specific guidance for Richmond’s circumstances and some gaps will exist.</p>																
Alt 2 – Adopted Policy (status quo)		O M	O S				O S		O S	O L	O S	O L	O M				

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	<p>Interpretation Summary The adopted policy LP45 is brought forward by Policy 48. The policy was assessed with uncertainty, partly because the parking standards were unknown at the time of the assessment. The negative side of car-based travel is recognised within the assessment, alongside the disbenefits that this may bring (pollution, car-dependency, mode conflict, reduced land for development) but the efforts to respond to new technology and changing attitudes are recognised.</p>															

	Addressed in Reducing the need to travel and improving the choices for more sustainable travel	
SA Objective	47. Sustainable travel choices	48. Vehicular parking standards, cycle parking, servicing etc
Prevent and reduce waste, minimise non-renewable resources		
Reduce pollution, minimise impacts of development	+	O
Reduce reliance on public transport	++	+
Tackle climate emergency	+	
Adapt to the effect of climate change		
Protect and enhance existing habitats		
Promote high quality design and enhance heritage		+
Protect and enhance parks and open spaces		
Efficient use of land, buildings and infrastructure	+	+
Provide high quality and affordable housing for local needs		O
Promote healthy, safe and inclusive communities	++	O
Enable access to local services and facilities	++	O
Increase vitality and viability of town and local centres	++	O
Promote sustainable economic growth and employment opportunities		

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

3.11.1 This policy theme looks to ensure that the community and social facilities and services required to accompany new housing and new jobs are delivered. The planning policies seek to do this by coordinating providers and targeting those areas and communities that need to be prioritised for these new services.. Policies 49 – 50 have been measured against the appraisal framework in this section.

Table 3.49: 49 – Social and Community Infrastructure (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy			+				+		+	+	+	+	O	+				
			S				S		S	S	S	S	M	M				
	Interpretation Summary Policy 49 ensures adequate provision of community services and facilities, protecting existing sites and requiring new provision to be inclusive and adaptable, to accord with Living Locally. A new criterion allows for a change of use to wholly affordable housing without the need to explore and market for alternative social infrastructure uses (Objective 10). The policy seeks high quality, inclusive design (Objective 7).														Policy 49 provides a specific Richmond-focused response to the possible needs for social and community infrastructure, and is the preferred strategy.	The Council should work with partners in social and community care to assess, plan and deliver present and future needs.		
Alt. 1 – No Policy			+				O		+		+	+	O	+				
			S				M		S		S	S	M	M				
	Interpretation Summary Social and community infrastructure is recognised in national and London planning policy as an important aspect of healthy places that needs to be planned for alongside homes and jobs. The London Plan sets out part of this need in Policy S1 and looks for local authorities to develop a response to need with partners in Policy S2. As a strategic policy, this leaves the specific needs of Richmond unmet.																	
Alt 2 – Adopted Policy (status quo)			+						+		+	+	O	+				
			S						S		S	S	M	M				

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	<p>Interpretation Summary The adopted policy LP28 is brought forward by Policy 49. The policy was assessed positively for providing flexible social and community buildings in places where they were needed, meeting need and reducing the need to travel.</p>															

Table 3.50: 50 – Education and Training (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Draft Policy			+				+		+		+	+	O	+			
			S				S		S		S	S	M	S			
	<p>Interpretation Summary Policy 50 updates the existing approach with additional detail regarding provision of childcare places, and to involve Achieving for Children in discussions. For promoting local employment opportunities, details updated to reflect adopted Planning Obligations SPD and circumstances when a financial contribution e.g. to Work Match may be accepted. The policy is specific on the implementation of Local Employment Agreements. The policy supports a good use of land and buildings which also implies good design.</p>																
Alt. 1 – No Policy			+				O		O		+	+	O	+			
			S				M		M		S	S	M	S			
	<p>Interpretation Summary Education and training facilities are recognised in national and London planning policy as an important aspect of healthy places that needs to be planned for alongside homes and jobs. The London Plan sets out part of this need in Policy S1 and looks for local authorities to develop a response to need with partners in Policy S3. As a strategic policy, this leaves the specific needs of Richmond unmet.</p>																
Alt 2 – Adopted Policy (status quo)			+								+	+	O	+			
			S								S	S	M	M			
	<p>Interpretation Summary The adopted policy LP29 is brought forward by Policy 50. The policy scores well for the reduction of travel and for the possible dual use of buildings for social and community use. The assessment speculates that buildings in town centres might add to the overall vitality here.</p>																
	<p>Policy 50 provides a specific Richmond-focused response to the possible needs for education and training, and is the preferred strategy.</p>																
	<p>The Council should work with education and training providers to assess, plan and deliver present and future needs.</p>																

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			

	Addressed in Securing new social and community infrastructure	
SA Objective	49. Social and Community Infrastructure	50. Education and Training
Prevent and reduce waste, minimise non-renewable resources		
Reduce pollution, minimise impacts of development		
Reduce reliance on public transport	+	+
Tackle climate emergency		
Adapt to the effect of climate change		
Protect and enhance existing habitats		
Promote high quality design and enhance heritage	+	+
Protect and enhance parks and open spaces		
Efficient use of land, buildings and infrastructure	+	+
Provide high quality and affordable housing for local needs	+	
Promote healthy, safe and inclusive communities	+	+
Enable access to local services and facilities	+	+

Increase vitality and viability of town and local centres	O	O
Promote sustainable economic growth and employment opportunities	+	+

3.12 Creating safe, healthy and inclusive communities

3.12.1 This policy theme looks at the general health and well-being of individuals and communities. This group of policies cover some over-arching themes, including the beneficial impact of access to open spaces and natural environments and good transport, but also promotes growing food in gardens and allotments and seeks to manage the detrimental impacts of development on communities, such as noise and nuisance. Policies 51 – 54 have been measured against the appraisal framework in this section. Following this section, policy 55 is also assessed (Delivery and Monitoring).

Table 3.51: 51 – Health and well-being (strategic policy)

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Draft Policy		++ M	++ S					+ S			++ S	++ S	+ S	O M		
	<p>Interpretation Summary Policy 51 reflects health priorities and future infrastructure needs, such as space for social prescribing, emphasis on inclusive access, dementia-friendly environments, and public toilets and drinking water. The section on inclusive design specifically references the Council’s ambition for making women and girls feel safer and more visible in public spaces. It reflects the adopted London Plan’s more restrictive approach to hot food takeaways (though the policy uses ‘fast food’ which is less clear), and this may discourage new outlets. It actively promotes development that results in better access to open spaces, shops, services and enables safer and easier active travel options. Objective 14 is considered uncertain, as some employment uses will need to cluster with others, and preferable sites for some uses may be away from where people live or receive other services (for instance, when there are non-conforming uses).</p>														Policy 51 provides a specific Richmond-focused response to the health and well-being needs of communities living here, and is the preferred strategy.	The Council should work with providers of social care, health care and other publicly available resources to assess, plan and deliver present and future needs.
Alt. 1 – No Policy			+ S					O M			+ S	++ S	+ S	- M		
	<p>Interpretation Summary National planning policy places a general emphasis on aiming to achieve healthy, inclusive and safe places. The London Plan covers this through general strategic advice in Policies S1 to S3, and covers other aspects of public health (takeaways, public toilets, drinking water)</p>															

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
	through parts of other policies (E9, D6, S6). Whilst providing a sound strategic framework, it is not geared towards resolving particular issues within boroughs and will have gaps.																
Alt 2 – Adopted Policy (status quo)			+								+	+		-			
	Interpretation Summary The adopted policy LP30 is brought forward by Policy 51. The policy was assessed well on improving travel options and bringing services and homes closer together. It was marked down for preventing take-aways from opening.																

Table 3.52: 52 – Allotments and food growing spaces

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy		+	O		+	+		+	O	O	+	+						
		S	S		M	S		S	M	M	S	S						
	<p>Interpretation Summary Policy 52 is brought forward from the existing Local Plan verbatim, and continues to protect existing allotments and support space for food growing. In practice, given the emphasis of the plan on the environment, allotments don't offer a choice as a possible housing site and the recent pattern of over-subscription for allotments suggests that the land is being used effectively, rather than being underused (the recent Open Space Assessment suggests a provision of allotments above target). Produce grown may reduce the need for travel for food.</p>														Policy 52 provides a means of protecting allotment spaces which is responsive to Richmond's circumstances, and it provides the preferred approach.	Evidence suggests an unmet need for allotments, though a high provision per head compared with other London boroughs. Monitor through the Open Space Assessment.		
Alt. 1 – No Policy		+	O			+			+			+						
		S	S			M			S			S						
	<p>Interpretation Summary The London Plan protects food growing spaces such as allotments and encourages community gardening on new spaces and in meanwhile projects (Policy G8). Allotments are not included as a categorisation of open space within policy G4.</p>																	
Alt 2 – Adopted Policy (status quo)		+	O		+	+		+	-	-	+	+						
		S	S		M	S		S	M	S	S	S						
	<p>Interpretation Summary The adopted policy LP32 is brought forward by Policy 52. The policy scored well on protecting green space and in terms of the contribution made to biodiversity and well-being, but was scored down because the land is not necessary the most efficient use and it may reduce choice opportunity for housing land.</p>																	

Table 3.53: 53 – Local Environmental Impacts

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy		++ S							++ L		+ S	++ M						
	<p>Interpretation Summary Policy 53 continues to seek to minimise adverse effects of and protect the amenity of existing occupiers. It now includes agent of change principles, and stresses the approach to be taken where noise is a factor in the development. The policy promotes safer and healthier communities by ensuring standards are high and impacts of development are low (Objective 11). The policy cross refers to other detailed policies such as Policy 8 and Policy 9.</p>														Policy 53 provides a means of controlling the effects of development and change within Richmond in the context of wider advice.	The Council has SPDs to control / manage some aspects of environmental impact and will work in conjunction with partners to develop appropriate strategies alongside this policy.		
Alt. 1 – No Policy		++ S						++ L		+ S								
	<p>Interpretation Summary National policy guidance contains broad advice at para 185-188, and the London Plan contains policies to control elements of environmental impact, including D13, D14 and SI1. The Mayor has recently introduced LPGs covering air quality which sets benchmarks for all development, including a simplified approach for minor development.</p>																	
Alt 2 – Adopted Policy (status quo)		++ S						++ L			++ M							
	<p>Interpretation Summary The adopted policy LP10 is brought forward by Policy 53. The policy was assessed very well for reducing the adverse impacts of development on surroundings and on those people impacted.</p>																	

Table 3.54: 54 – Basements and subterranean developments

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Draft Policy		++ S			++ S				+ S	+ L	+ M						
	Interpretation Summary Policy 54 reflects the policy approach to flood risk and sustainable drainage in terms of dealing with basements in flood affected areas, assessing throughflow and groundwater and setting out where Basement Impact Assessments are required.																
Alt. 1 – No Policy		O M			-/O M		-/O L		O L		-/O M						
	Interpretation Summary National policy is relatively silent on basement development, and the London Plan encourages boroughs to develop policies for basement development where this is a local issue. It is unlikely that this framework could deal with applications in the borough at a detailed level. Some objectives could be detrimentally affected.														Policy 54 is the preferred strategy as it updates existing policy and provides details that are lacking in the strategic advice.	The Council is due to publish further advice on the issue. The Plan sets out where Basement Impact Assessments are required.	
Alt 2 – Adopted Policy (status quo)		++ S			+ S				+ S	+ L	+ M						
	Interpretation Summary The adopted policy LP11 is brought forward by Policy 54. The policy was assessed positively for ensuring that basement developments are appropriate and make the necessary mitigations to prevent negative impacts where they are developed.																

	Addressed in Creating safe, healthy and inclusive communities			
SA Objective	51. Health and well-being	52. Allotments and food growing spaces	53. Local Environmental Impacts	54. Basements and subterranean developments
Prevent and reduce waste, minimise non-renewable resources				
Reduce pollution, minimise impacts of development	++	+	++	++
Reduce reliance on public transport	++	O		
Tackle climate emergency				
Adapt to the effect of climate change		+		++
Protect and enhance existing habitats		+		
Promote high quality design and enhance heritage				
Protect and enhance parks and open spaces	+	+		
Efficient use of land, buildings and infrastructure		O	++	+
Provide high quality and affordable housing for local needs		O		+
Promote healthy, safe and inclusive communities	++	+	+	+
Enable access to local services and facilities	++	+	++	
Increase vitality and viability of town and local centres	+			
Promote sustainable economic growth and employment opportunities	O			

Table 3.55: 55 – Delivery and Monitoring

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Draft Policy																		
	<p>Interpretation Summary Policy 55 outlines the approach to delivery through partnership working, plan monitoring, securing planning obligations and delivery mechanisms, and enforcement and monitoring. The policy describes process, and partnership arrangements, which will deliver and enforce the plan. This has no bearing on the SA objectives.</p>														N/A	N/A		
Alt. 1 – No Policy																		
	<p>Interpretation Summary Not relevant.</p>																	
Alt 2 – Adopted Policy (status quo)																		
	<p>Interpretation Summary The adopted plan does not directly provide a policy for this subject. Therefore, the impact is not relevant.</p>																	

3.13 Overview of findings

The testing of the Local Plan’s policies has shown that they represent a suite that best addresses the sustainability objectives in comparison to the alternatives selected. The table below provides an overview of the Local Plan policy framework in relation to the effects against the sustainability objectives (grouped by topic).

	Addressed in Local Plan Framework										
SA Objective	Spatial Approach and Place-Based Strategies	Responding to the climate emergency and taking action	Delivering new homes and an affordable borough for all	Shaping and supporting town / local centres as they adapt and respond to the pandemic	Increasing jobs and helping business to grow and bounce back following the pandemic	Protecting what is special and improving our areas (heritage and culture)	Increasing biodiversity and the quality of our green and blue spaces, and greening the borough	Improving design, delivering beautiful buildings and high-quality places	Reducing the need to travel and improving the choices for more sustainable travel	Securing new social and Community infrastructure to support a growing population	Creating safe, healthy and inclusive communities
Prevent and reduce waste, minimise non-renewable resources	+	++	O	O		+	+	+			
Reduce pollution, minimise impacts of development	+	++	O	O	O	+	++	++	+		++
Reduce reliance on public transport	++	++	+	++	O	++	+	+	++	+	++
Tackle climate emergency	+	++				+	++	+	+		
Adapt to the effect of climate change	O	++	O		O	+	++	+			++

Protect and enhance existing habitats	++	+	++	+	+	+	++	+			+
Promote high quality design and enhance heritage	+	++	++	++		++	++	++	+	+	
Protect and enhance parks and open spaces	++	+	+	+	+	++	++	+			+
Efficient use of land, buildings and infrastructure	++	++	++	++	O	+	+	++	+	+	+
Provide high quality and affordable housing for local needs	O	O	++	O	O	O	O	+	O	+	+
Promote healthy, safe and inclusive communities	+	++	++	++	++	++	++	++	+	+	++
Enable access to local services and facilities	++	+	++	++		+	++	++	+	+	++
Increase vitality and viability of town and local centres	++		++	++	++	++	+	++	+	O	+
Promote sustainable economic growth and employment opportunities	++	+	+	++	++	+	O	+		+	-

- 3.13.1 Broadly, the policies of the plan have a positive overall effect on the borough when tested against the SA objectives, and generally this has been enhanced as the plan has evolved. In all cases, the emerging policies perform better than the existing adopted policies and the national and regional (London Plan) frameworks. In a handful of cases, the emerging policies have simply brought forward the adopted policies forward, and the improvement against the SA objectives is negligible or minimal. Similarly, the London Plan is very detailed in some of its policies (notably in design matters, or where further guidance has been prepared) or takes a broad approach to some issues, and offers an approach which matches the emerging plan. The emerging plan, however, always has the benefit of being prepared from a local context using local evidence, and generally fares better against the SA objectives.
- 3.13.2 A number of strategic policies score well across all of the SA objectives. This is particularly noticeable in respect of Policy 1 (Living Locally), Policy 2 (Spatial Strategy), Policy 3 (Tackling the Climate Emergency), Policy 28 (Local character and design quality), Policy 38 (Urban Greening) and Policy 44 (Design Process). These policies are at the forefront of managing the balance between meeting the borough's development needs and seeking to ensure that environmental criteria and the plan's strong emphasis on the climate change agenda are sensibly managed within a clear policy structure.
- 3.13.3 A further key trend in the outcomes reflects a conflict reported with the plan's objective. It is noticeable that policies that are focused on aspects of the natural environment or protection of natural or green assets score very well against the environmental objectives, but are often uncertain in respect of meeting development needs, and particularly housing needs (see, for example Policy 34 (Green and Blue Infrastructure) where the reference to the contribution of 'non-designated sites' now makes this more stark). This is largely because protecting land and giving space to fully cater for environmental matters restricts the choices for accommodating development. This may be detrimental, and can mean that development is perhaps more likely to be exposed to risks such as flooding (e.g. where town centres lie close to the borough's rivers). It also suggests a denser, more compact form of development in those places, which itself brings potential conflicts with the borough's built heritage, and may not offer residents the range of accommodation they need to live here.
- 3.13.4 This works the other way as well, with policies focused on the delivery of the borough's development needs often bringing a negative impact upon environmental objectives, notably in relation to waste and pollution (see Policy 10 (New Housing)). There is also uncertainty in respect of the impact upon travel patterns and open spaces, which may see greater use from more people as they're promoted as a means of growing the routes for active travel via the green and blue infrastructure network.
- 3.13.5 What the plan seems to do effectively, however, is getting that balance about right. This is of course reflected in the strategic policies that seek to find the balance, but also in specific policies such as Policy 14 (Loss of housing) and Policy 17 (Supporting our centres) where there is an emphasis on reuse and adaptation of available spaces, existing buildings and other resources, rather than looking to redevelopment.
- 3.13.6 Transport and movement is an area where the plan works very hard to move away from car dependency, but the challenges are significant. Whilst the outcomes against the strategic transport Policy 47 (Sustainable travel choices) are positive, the uncertainty around parking standards and the means of reducing car dependency is evident in Policy 48, though this is an improving situation on the adopted plan. The relative isolation of parts of the borough,

the suburban nature of much of the area and the wide car ownership remain challenges to the borough which will take time to change. Some of these difficulties are reflected in the available land for development; opportunities in places like Ham, Hampton and Whitton can be relatively remote, and the borough also has to contend with traffic generated by major institutions and routes from beyond the borough – matters such as Twickenham Stadium, several higher education establishments and the presence of the strategic A205 route.

- 3.13.7 Policies looking to support the borough’s centres and parades score well, with a flexible approach taken; one which does not rely on retail to see centres thrive, but taking a broad approach to diversification with residential also encouraged. The plan has the benefit over the London Plan of seeing the impact of the pandemic and being able to react to it. The plan also takes a proactive take to the centres despite changes to permitted development rights which could undermine retail and commercial uses in the centre. Some of this has been achieved through an Article 4 Direction, but this has also allowed for a more sophisticated approach to centres, allowing them to adapt whilst also recognising their value to local communities and the Living Locally objective.
- 3.13.8 Policies protect industrial land, which is important for maintaining places where industry and employment can prosper and establish supportive clusters. Employment land has been lost to other uses, and changes to permitted development has made this prospect more likely. Maintaining current land provides some certainty. The policies also support offices and office space in town centres and across the borough, which scores well against economic SA objectives. The updated information around the need for office space hasn’t impacted upon the scoring in the appraisal significantly. However, industrial and commercial space can be in locations away from centres, and can sometimes perpetuate car-based commuting (especially for shift- or night-based workers) or lorry based supply and distribution. The concern about losing land and the difficulty in allocating new commercial land means that this is difficult to address in the plan.
- 3.13.9 Design and heritage policies in the plan score well. Heritage assets are protected, and the setting of places is also assisted greatly by designations such as ‘OOLTI’ (compare the presence of Policy 36 with the situation if this policy relied on the London Plan). The Urban Design Study is a key evidence document to support decision making in this regard, and can help to make the most of the land that is available for development and guide aspects of design such as height and density (see Policy 45, for example). There is concern identified in the appraisal over the balance between protecting heritage assets and bringing them back into use through reuse or adaption (particularly where this involves new forms of energy). Having a relatively strict approach to the value of heritage may risk leaving such buildings and assets unused for longer, which may also go against the principle of using land and buildings efficiently.
- 3.13.10 Richmond’s health and well-being policy (Policy 51) gathers some of the more focused aspects of the design policy into one place (such as drinking water, toilets and the needs of older people), but discusses restrictions on ‘fast food’ outlets, rather than ‘hot food’ outlets, which may bring difficulties in implementation owing to the absence of a definition.

Summary of issues arising

- Strategic policies work well in aiming to find a balance between meeting environmental objectives and aspirations and accommodating development requirements

- Policies focused on, or seeking to protect, environmental assets often bring uncertainty to objectives looking to meet residents needs, as they tend to limit options and choices to do this
- Likewise, policies focused on meeting development needs often have an uncertain or negative impact on environmental objectives, particularly around waste, pollution and travel choices
- Reducing car use will be a major challenge with car ownership high, and development planned in places with lower PTAL ratings that desirable; though the policy framework is moving in the right direction
- Town centre policies perform well, encouraging a diverse and responsive approach to making centres thrive, including allowing residential, social and community uses alongside retail and commercial development.
- Some employment policies have negative implications around commuting and distribution, but protecting existing employment land is important to give confidence to employers and allow people the chance to live close to work.
- Design policies score well in ensuring that the land available for development is brought forward with sensitivity to the issues present.

4.0 Testing the Area-based Strategies and Site Allocations

4.1 Context

4.1.1 The Local Plan contains Area-based Strategies that include site allocations (that can accommodate growth, renewal and regeneration) across the borough. The borough has been divided into nine high-level ‘places’, based on categorisation to reflect a ‘sense of place’ as well as identifying areas recognised as ‘places’ by local people as part of the Urban Design Study 2021. Consequently, it is not reasonable to consider alternatives to these locations. These places are:

- Hampton & Hampton Hill
- Teddington & Hampton Wick
- Twickenham, Strawberry Hill & St Margaret’s
- Whitton & Heathfield
- Ham, Petersham & Richmond Park
- Richmond & Richmond Hill
- Kew
- Mortlake & East Sheen
- Barnes

4.1.2 Each Area-based Strategy sets out its key priorities and requirements, with a strategy plan presenting these. While every place in the borough is expected to see some change over the plan period, there are some specific sub-areas identified as the places where growth may be accommodated, as identified in the local evidence base and through specific Site Allocations. The Place-Based Strategies have been assessed against the SA objectives bearing in mind the objectives of each of their respective allocations.

4.1.3 The site allocations have been assessed together for each of the Place-based Strategies, in terms of what they each bring to meeting the objectives of the wider strategy. There have been instances where particular allocations have been singled out and discussed individually where this is necessary to explain scoring or highlight particular issues. At this stage, the exact design of future development proposals – such as height, density and massing – and any significant information around the impact of development on the allocations – such as traffic movements or mitigation measures – are unknown and would be subject to planning approval. Similarly, it is not possible to know the quantum of new business floorspace created or the amount of housing units, and the type of floorspace generally cannot be determined so assumptions have been made over sites’ delivery. There are 38 sites allocated within the Area-based Strategies; the general expected impact of the site allocations has been factored into the assessment of the overall strategy.

Reasonable alternatives

4.1.4 In the case of the site allocations, it is largely not felt necessary to assess different options in respect of each one. Most of the allocations in the plan are brought forward from the adopted plan, have had the benefit of discussion and assessment through the previous plan-making process and have not materially changed. There are, however, eleven new allocations in the emerging plan, and it is prudent to consider reasonable alternatives on

each of these. The sites and their alternatives are listed below, and the assessments follow the assessments of the strategies and sites together, in section 4.3:

- Car park for Sainsbury's, Uxbridge Road, Hampton:
 - a. proposed site allocation
 - b. no site allocation
 - c. alternative use option: office/light industrial employment use with the river corridor enhancements on the southern edge.

- Hampton Telephone Exchange
 - a. proposed site allocation
 - b. no site allocation

There is no alternative use option, as this is a small site outside of the town centre and close to residential development.

- Teddington Police Station
 - a. proposed site allocation
 - b. no site allocation

There is no alternative use option, as this is a small site, towards the edge of the town centre, and there aren't practical alternative uses that would result in different SA outcomes to the site allocation.

- Homebase, Hanworth
 - a. proposed site allocation
 - b. no site allocation

There is no alternative use option, because the allocation seeks a residential led scheme in a location away from recognised centres. Non-residential town centre uses would therefore be inappropriate, though the allocation seeks locally appropriate small scale non-residential uses to support the residential offer.

- Fulwell Bus Garage
 - a. proposed site allocation
 - b. no site allocation

There is no alternative use option, because the allocation seeks a mix of uses dependent on the land available. The site is in multiple ownership and use, and will be dependent on how and when elements become available. The allocation features key aspiration for the site, which includes improving access to the nearby railway station.

- Whitton Community Centre
 - a. proposed site allocation
 - b. no site allocation

There is no alternative use option, as this is a small Council owned site in an out of centre area.

- Former House of Fraser, Richmond
 - a. proposed site allocation
 - b. no site allocation

There is no alternative use option, as the allocation reflects an extant planning permission brought forward by the landowner.

- Richmond Telephone Exchange

- a. proposed site allocation
- b. no site allocation

There is no alternative use option, as this is a small site outside of the town centre and close to residential development.

- American University
 - a. proposed site allocation
 - b. no site allocation
 - c. alternative use options (1) commercial-led, non-residential, mixed use scheme with hotel / office (2) wholly residential with retention of existing buildings.
- Homebase, East Sheen
 - a. proposed site allocation
 - b. no site allocation

There is no alternative use option, as the allocation reflects an extant planning permission.
- Kew Retail Park
 - a. proposed site allocation
 - b. no site allocation

alternative option: wholly residential with small scale commercial use.

Testing the Place-based Strategies and Allocations

Hampton and Hampton Hill

- 4.1.5 The Hampton and Hampton Hill area encompasses Hampton’s Historic Centre, Hampton Waterworks, Hampton Court and Bushy Park, and the residential areas of Hampton and Hampton Hill. The setting of the area is defined by its river frontages with the Thames and the Longford, the open spaces of Bushy and Home Parks, and the nationally significant Hampton Court Palace and gardens. The relationship with the River Thames is a valued feature, contributing to a semi-rural character, though it’s not always publicly accessible. There are three inhabited islands along this part of the river, with Platts Eyot the largest.
- 4.1.6 The residential areas have a suburban character. Hampton Hill maintains its village character and has a concentration of small shops and services and a largely commercial function. Hampton Village is a larger local centre, though dispersed. Hampton Nursery Lands serves an area lacking in local retail facilities, and amongst the most relatively disadvantaged in the borough.

Table 4.1: Place-based strategy for Hampton and Hampton Hill

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Area Strategy	O	+	++	+	+	+	++	+	O	++	+	+	++	+		
<p>Interpretation Summary</p> <p>The Hampton Hill Area Strategy has many positive effects. Development should enhance the local centres, encouraging further business and activity. This should bring out more people, increasing safety and community involvement. Combined with measures such as temporary closure of roads, this should encourage active travel to local centres.</p> <p>Focus on a movement strategy within an enhanced or improved public realm should help active travel, whilst areas that have a poorer public realm should see improvements. Open spaces should be improved, and streets enhanced with trees. The role and character of the Thames within the sub-area is recognised, and efforts to preserve and enhance this setting should see benefits in movement and in the appreciation of the water.</p>																

4.1.7 There are five site allocations within this area:

1. Hampton Square, Hampton
2. Platts Eyot, Hampton
3. Hampton Traffic Unit, 60-68 Station Road, Hampton
4. Car park for Sainsbury's, Uxbridge Road, Hampton
5. Hampton Telephone Exchange (Molesey Telephone Exchange), 34 High Street, Hampton

Table 4.2: Sustainability Appraisal for the Hampton and Hampton Hill Site Allocations

Site Allocations	Scoped Sustainability Objective and Impact														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Hampton and Hampton Hill	+	0	0	0	0	0	+	+	++	++	0	++	+	++		
<p>Interpretation Summary</p> <p>Plan allocations 1-3 are updated allocations from the adopted plan (SA1 – SA3). Sainsbury's car park is a new allocation, proposed for MOL release for 100% on-site social housing. Hampton Telephone exchange is another new allocation for mixed-use.</p> <p>All of the site allocations are currently developed, and are being redeveloped (notwithstanding the Sainsbury's car park, which is designated as MOL despite the hard-standings and petrol station which performed weakly against MOL designation criteria). On the whole, the development of sites can bring benefits to the areas in which they are located by generating critical mass to support services and public transport, and through improving the townscape and public realm by using underdeveloped sites. Sites ought to be developed with a view to protecting acknowledged assets, including heritage and biodiversity, and all will seek to create linkages to surrounding centres and services.</p> <p>In each case, housing is provided (sometimes within a mixed use context) and the needs of the borough can be met through the allocations. There are uncertain outputs in respect of some environmental objectives because of the nature of development, and the risk that travel and pollution is increased. Platts Eyot in particular has potential issues to overcome in respect of access and its relationship to the water (including issues connected to flooding and the retention of river related industry) that are uncertain, including an uncertain outcome in respect of</p>																



Objective 11 because of the risk of flooding. The Station Road site in Hampton borders important open space and it and the new allocation at the Telephone Exchange on high street are both within the Hampton Village Conservation Area.

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Teddington and Hampton Wick

- 4.1.8 Teddington and Hampton Wick encompasses Teddington town centre and the surrounding residential areas in both Teddington and Hampton Wick. The place is defined by its setting of Bushy Park and Hampton Court to the south and the River Thames to the north and east, providing a special landscape setting, along with a good green infrastructure network of open spaces, although not all are publicly accessible.
- 4.1.9 Teddington is identified as a district centre in the borough’s centre hierarchy and the London Plan and provides a balance of multiple and independent shops and services where the vacancy rate in the past has been consistently low. The area is home to the National Physical Laboratory and LGC and The London Plan recognises its existing office functions, generally within smaller units, which should be protected. The proximity of Teddington town centre and railway station provides good transport links into central London.
- 4.1.10 Outside of the town centre, Teddington is characterised primarily by Victorian and Edwardian terraced and semi-detached properties. Hampton Wick is between Bushy Park, the River Thames and Kingston, predominantly a residential area of quiet winding streets – many of which are conservation areas – and a distinctive historic core and neighbourhood centre.

Table 4.3: Place-based strategy for Teddington and Hampton Wick

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Draft Policy	O	O	++	O	+	+	O	++	+	++	++	++	++	++		
	<p>Interpretation Summary The Area Strategy for Teddington and Hampton Wick looks to improve town and local centres by adding to the current mix of uses and adding further office / commercial floorspace and flexible workspaces. This has the benefit of improving local centres, making employment available locally both of which may have a positive impact on travel needs. The promotion of better public realm and the focus on open spaces and connectivity also supports well-being and active travel. The river and riverside is seen as a key characteristic, and a potential asset for travel and recreation. Social and community facilities are planned for the town centre through the allocations as well as housing and commercial development.</p> <p>Development brings possible increases in noise and pollution, and it is possible that development will give rise to, or not reduce, current levels of private transportation.</p>															

4.1.11 There are four site allocations within this area:

6. Telephone Exchange, Teddington
7. Teddington Delivery Office, Teddington
8. Strathmore Centre, Strathmore Road, Teddington
9. Teddington Police Station, Park Road, Teddington

Table 4.4: Sustainability Appraisal for the Teddington and Hampton Wick Site Allocations

Site Allocation	Scoped Sustainability Objective and Impact														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Teddington and Hampton Wick	+	O	+	O			++		++	++	+	++	++	++		
<p>Interpretation Summary</p> <p>Plan allocations 6-8 are updated allocations from the adopted plan (SA5 – SA7). Site 9 is a new site allocation for community / social infrastructure-led mixed use development with residential. All of the sites are previously developed land, and three are within walking distance of services and shops located within Teddington town centre. All three can create good links with the town centre and provide further critical mass to support it. These sites have good access to public transport. Sites would need to be developed with respect to the surrounding context, including the historic settings, and use good design to deliver quality schemes. The Strathmore Centre site is less well located, but replaces an existing community facility and delivers new housing.</p> <p>Development, by its nature, potentially threatens to increase pollution and noise for existing residents, and can compromise open space and biodiversity, though none of the sites are close to such places. Outcomes in respect of traffic generation and impact on the climate emergency are uncertain at best. Redevelopment of existing community and social facilities – like the police station and the delivery office – may lead to questions about the continuity of those services, and possibly impact perceptions about the safety or inclusivity of the place.</p>																

Twickenham, Strawberry Hill and St. Margaret's

4.1.12 Twickenham, Strawberry Hill and St Margaret's Area comprises Twickenham town centre, the Riverside and the residential areas of the wider area including St Margaret's, Strawberry Hill and Fulwell. The area has a green, leafy character away from the commercial town centre, particularly along the River Thames to the southern side, and is complemented by the River Crane, Fulwell Golf Course and Strawberry Hill House. To the north of the area is the famous rugby stadium, and a short distance to the south of it is The Stoop, home of Harlequins RFC.

Table 4.5: Place-based strategy for Twickenham, Strawberry Hill and St. Margaret's

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Draft Policy	O	O	O/+	O	O/+	O	+	+	++	++	O/+	++	O	+		
<p>Interpretation Summary</p> <p>The policy focuses on the health of the town centre and local centres, including encouragement of arts, culture and leisure to develop the town centre more broadly. The night-time economy is encouraged, provided this is not at the expense of town centre living. Office and flexible workspace is also promoted, including in existing sites which include river-related businesses. The public realm should be improved, and a particular priority is Twickenham Riverside. This development will bring benefits for centres, and provide for new residents. Initial feasibility has been carried out for a new pedestrian and cycle bridge across the River Thames, identifying a link between Twickenham and Ham. This could further increase the vibrancy of the town centre and increase access to open space for residents.</p> <p>The policy brings additional pressures for the riverside area, through more attractive spaces, protected industry and the promotion of movement. This may attract more people and place pressure on the natural elements of the water, or increase flood risk, and these outcomes are uncertain. Noise during the evening is a possible area of conflict between visitors and residents. The area has a major sporting venue and more intensive use could increase pollution and traffic.</p> <p>The allocations are varied; on the one hand, significant educational sites and sporting venues are looking to develop their sites generally to compete with institutions beyond the area and to attract new people. Dependent on specific schemes, these could challenge the primacy of the</p>																

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	town centre and place additional pressure on the transport network. On the other, a handful of small sites close to the town centre present to opportunity to meet housing needs and support the town centre and the town as a place to visit. The challenge for the policy is balancing the objectives for the improvement of the town centre with the wider demands of the significant institutions that exist in this area.															

4.1.13 There are ten site allocations within this area, which includes two new allocations:

10. St Mary's University, Strawberry Hill
11. Richmond upon Thames College, Twickenham
12. The Stoop (Harlequins Rugby Football Club), Twickenham
13. Twickenham Stadium, Twickenham
14. Mereway Day Centre, Mereway Road, Twickenham
15. Station Yard, Twickenham
16. Twickenham Telephone Exchange
17. Twickenham Riverside and Water Lane / King Street
18. Homebase, Twickenham Road, Hanworth
19. Fulwell Bus Garage, Wellington Road, Twickenham

Table 4.6: Sustainability Appraisal for the Twickenham, Strawberry Hill and St. Margaret's Site Allocations

Site Allocation	Scoped Sustainability Objective and Impact														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Twickenham, Strawberry Hill and St. Margaret's		-	-/O	O	+	O	+	+	++	++	+	O/+	+	O/+		
	Interpretation Summary Plan allocations 10-17 are updated allocations from the adopted plan (SA8 – SA12 and TW2, TW5 and TW7 respectively). Plan allocations 18 and 19 are new allocations for residential-led development. Those allocations within the town centre offer previously developed sites that can															

	<p>strengthen the offer within the town centre and contribute to meeting the policy objective of diversification and improvement. Improving the riverside in itself can help to develop critical mass to support the function of the town centre and promote well-being and opportunity for residents. The site allocations recognise the heritage elements and seek to improve the quality of public spaces. River related business is supported.</p> <p>Some of the allocations outside of the town centre are important institutions for the area, but their importance is greater than the immediate area (notably the stadia). The proposals here are aimed primarily at increasing the attractiveness of those institutions and whilst some benefit will be felt by immediate residents, the greater benefit is with the users of those sites, who are as likely to come from further afield. This creates a conflict with the vision / policy for the area, and with the SA objectives. The new allocations bring some opportunity to provide housing to meet the borough's needs and, in the case of the Homebase store, may have some benefits in respect of traffic generation.</p>		
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Whitton and Heathfield

- 4.1.14 Whitton and Heathfield encompasses residential areas around the two along with Whitton High Street. Whitton and Heathfield is slightly isolated from the rest of the borough as a result of heavy traffic on Chertsey Road (A316) and by the River Crane. The residential areas are primarily large estates of inter-war terraced or semi-detached houses. Whitton has a unique 1930s High Street. Heathfield has less of a focus and fewer focal points.
- 4.1.15 Whitton town centre forms a focus of retail activity, it is identified as a district centre in the borough’s centre hierarchy and the London Plan. Hanworth Road, Nelson Road and Powder Mill Lane serve day to day needs. The River Crane and Crane Park provide a natural-feeling environment, enclosed from the surrounding housing estates by mature vegetation. This is continued through several open spaces, including Hounslow Heath.

Table 4.7: Place-based strategy for Whitton and Heathfield

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Draft Policy		+	++	O	+		+	++	+	+	+	+	+	+		
<p>Interpretation Summary</p> <p>The Area Strategy for Whitton and Heathfield is focused on the character of the area as a suburb, with some emphasis on the role of Whitton as a town centre and focus for community activity. The policy looks to restore the characteristics of the place through retaining and restoring important parts of the townscape and reducing the dominance of cars, both of which may produce a positive effect on more active forms of travel and improving air quality.</p> <p>The emphasis on Whitton includes improving the relationship between the railway station and the High Street, and there is also an effort to better connect the High Street into the community through spill-outs, events and temporary road closures. Beyond this, the policy looks to improve open spaces, especially in areas of deficiency, and embrace the River Crane valley character. The allocations in this area seek to contribute to these broad objectives in their own way, dependent on their location and current use.</p>																

- 4.1.16 There are three site allocations within this area:
- 20. Telephone Exchange, Ashdale Close, Whitton
 - 21. Kneller Hall, Whitton
 - 22. Whitton Community Centre, Percy Road, Whitton

Table 4.8: Sustainability Appraisal for the Whitton and Heathfield Site Allocations

Site Allocation	Scoped Sustainability Objective and Impact														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Whitton and Heathfield	+	O	O	O		O	+	+	+	O	+	++	+	++		
<p>Interpretation Summary</p> <p>Plan allocations 20 and 21 are updated allocations from the adopted plan (SA13 and SA14). Site 22 is a new allocation, offering an opportunity to reprovide community facilities with affordable housing. All of the sites are previously developed land, and offer the opportunity to deliver housing, employment/commercial and social and community facilities. The telephone Exchange site offers the opportunity to create new workspace in the town centre of Whitton, supporting the town centre and diversifying its offer, potentially creating new jobs and employment opportunities. Kneller Hall has the potential to create a new residential quarter in a distinctive and green setting, provided the heritage and open space assets are carefully considered (it is a candidate Site of Important Nature Conservation). Whitton Community Centre has a poor public transport availability, but the allocation seeks to replace the community asset and / or provide affordable housing which would be beneficial, and the site has links to other neighbouring services and facilities.</p> <p>Each allocation has uncertain outcomes in respect of their traffic and environmental outcomes, and some of the housing benefits are also uncertain, given the sensitivity of the location at Kneller Hall and the priority of other uses at the other allocations.</p>																

Ham, Petersham and Richmond Park

- 4.1.17 Ham, Petersham and Richmond Park is defined by its setting on a bend in the River Thames, providing an important element within the Arcadian Thames landscape, and broad belt of open land, including Petersham and Ham Commons. Ham House and Richmond Park are national landmarks and visitor attractions and the area includes the designated strategic view from King Henry VIII's Mound to St Paul's Cathedral. Richmond Park has protected status as an important habitat for wildlife; it is a European Special Area of Conservation and a National Nature Reserve as well as London's largest Site of Special Scientific Interest.
- 4.1.18 Some parts of this place are not well-served in terms of local shopping facilities and have been amongst the most relatively disadvantaged in the borough. Ham Parade is identified as a local centre, and exists along with other local clusters of shops, schools and local services across the area. The majority of residents work outside of the area. A large part of this place is covered by the adopted Ham & Petersham Neighbourhood Plan, which recognises the area as quite isolated, with few vehicular access points and limited bus routes, with more options to access on foot or by cycle.

Table 4.9: Place-based strategy for Ham, Petersham and Richmond Park

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Draft Policy	+	O	+	O		++	++	++	++	+	++	+	++	+		
<p>Interpretation Summary</p> <p>The Area Strategy for Ham is focused on enhancing the vitality and viability of the area's local centres and shopping parades through design and improvements to the public realm, and conserving and enhancing the green network focused around Ham House and Ham Common. It also looks to improve transport infrastructure and reduce the dominance of vehicles on main roads with a view to encouraging active travel (including a bridge link to Twickenham). The strategy aligns itself with the proposals of the Ham & Petersham Neighbourhood Plan.</p> <p>There are two allocations within the area; one of those seeks a redevelopment of the housing at Ham Close / Ham Village Green and would reprove the existing housing alongside increasing the overall quantum of housing. The other site, at Cassell Hospital, is dependent on the site becoming available and is constrained by heritage and open space assets, but could provide social and community facilities or residential development if redeveloped.</p>																

4.1.19 There are two site allocations within this area:

- 23. Ham Close, Ham
- 24. Cassel Hospital, Ham Common, Ham

Table 4.10: Sustainability Appraisal for the Ham, Petersham and Richmond Park Site Allocations

Site Allocation	Scoped Sustainability Objective and Impact														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Ham, Petersham and Richmond Park	0	0	-/0	0		+	+	++	++	+	0	0	+	+		
<p>Interpretation Summary</p> <p>Plan allocations 23 and 24 are updated allocations from the adopted plan (SA15 and SA16). Both are effectively brownfield sites within Ham, and would re-use or redevelop existing land and buildings. Both allocations look to improve the social well-being of the neighbourhood through the provision of required homes and services, and contribute to the overall vision; the Ham Close allocation will have a significant impact on the role of Ham Village Green, for instance. Both allocations have an impact upon green spaces, which are important in the overall context of Ham, and will need to be managed sensitively.</p> <p>A number of matters are uncertain and dependent on any final scheme(s). This includes impacts upon open space, the availability of local facilities and the effect of introducing high buildings. Whilst heritage is a key constraint, the plan is clear in its emphasis on possible impacts on major assets and the general townscape. Given the area’s relative isolation, the absence of public transport options and the need to travel to work outside of the area, addressing active travel is a particular challenge and breaking down established patterns and providing a convincing alternative to the car is the biggest obstacle.</p>																

Richmond and Richmond Hill

- 4.1.20 The Richmond and Richmond Hill area encompasses Richmond town centre and riverside, and the residential and mixed use areas into Richmond Hill and North Sheen.
- 4.1.21 Richmond’s character derives from its location on the River Thames and its historic built environment and landscape, which provides a strong setting to the town centre and surroundings. There are four Conservation Areas which are at the core of the town centre character. The wider place includes the historic Green, the open spaces along the riverside, accessed from the centre along characterful, intimate pedestrian lanes, and connectivity to the Thames Path, Old Deer Park and Richmond Park. The residential areas encompass Richmond Hill in the south-east and the gradual transition towards Kew to the north-east, reflecting much of its historical character and scenic views as a result of the steep topography. There are neighbourhood centres at Sheen Road and Friars Stile Road, and parades of local importance at Lower Mortlake Road and Kew Road.
- 4.1.22 Richmond town centre is the borough’s most accessible by public transport. As major road infrastructure runs through the area, there is a prominence of roads in the centre. The town centre is defined as a ‘major’ centre in the London Plan. It is the major shopping centre in the borough comprising a range of shops and services within a high quality environment. Richmond has attracted an impressive cluster of technology and IT companies. It also has a wide range of leisure and entertainment facilities and numerous public houses, cafes and restaurants.

Table 4.11: Place-based strategy for Richmond and Richmond Hill

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Draft Policy	+	+	+			+	+	++	+	++	+	++	++	++		
<p>Interpretation Summary</p> <p>The Area Strategy for Richmond and Richmond Hill is very much focused on Richmond town centre and ensuring its sustainability through the plan period, although all local centres and neighbourhood centres are considered important in meeting local need. In the case of the town centre, this includes using vacant units and encouraging a wide range of uses, including employment and workspaces, and reinforcing the town centre circuit through an improved public realm whilst also connecting with, and enhancing, the riverside environment. It also looks to widen the night-time economy, conscious of the impact this might have on residents who live there. It promotes sustainable travel to reduce car-dominance and improve air quality.</p>																

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	<p>Connectivity across the area is sought through green links and clear routes to major sites and landmarks. Clean air is a key priority in the town centre, and the North Sheen residential area also has a specific mention within the policy, particularly for the arrival point at the station. This could be improved in combination with the two allocations adjoining Manor Road.</p> <p>The site allocations in this area are varied and contribute various elements to the area's overall offer. There are allocations close to Richmond town centre that seek to improve the centre's offer by introducing town centre uses and residential development. The American University allocation protects the educational use of this site in the event of the planned relocation, and two large retail sites in North Sheen are proposed to accommodate new residential development. These latter allocations are asked to ensure no unacceptable impact on the local network and, alongside efforts to address active travel across the strategy area, this could bring improvements in traffic and the negative impacts of traffic (e.g. air quality).</p>															

4.1.23 There are six site allocations within this area:

25. Richmond Station, Richmond
26. Former House of Fraser, 16 Paved Court 20 King Street 4 To 8 And 10 Paved Court And 75 - 81 George Street Richmond
27. Richmond Telephone Exchange, Spring Terrace, Richmond
28. American University, Queens Road, Richmond
29. Homebase, Manor Road, East Sheen
30. Sainsburys, Lower Richmond Road, Richmond

Table 4.12: Sustainability Appraisal for the Richmond and Richmond Hill Park Site Allocations

Site Allocation	Scoped Sustainability Objective and Impact														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Richmond and Richmond Hill	0	0	-/0	+			+		++	++	0	+	+	++		
	<p>Interpretation Summary Plan allocations 25 and 30 are updated allocations from the adopted plan (SA19 and SA21). The remaining four are new allocations. House of Fraser is allocated for retail, office/workspace, and</p>															

leisure/community use, with active ground floor frontages and reflects an extant permission from late 2022. The Richmond Telephone Exchange is allocated for residential use maximising affordable housing. The American University is relocating to a neighbouring borough, and the building is allocated for education use as a priority, or community use. The Homebase at East Sheen is allocated for residential led development, which reflects a planning application for the site..

The allocations all use previously developed land, some of which is underused. Three of these sites are within/close to Richmond town centre and provide benefits through new uses and additional residents. Between them, the sites bring new homes and new employment opportunities, and the nature of the sites and the presence of heritage – particularly in Richmond – should demand creative use of land and good design solutions.

There are uncertainties over the impact of the allocations on waste, transport and climate change, as increasing numbers of people will increase the potential for travel, pollution and waste – though the impact will be dependent on how these are to be handled. Some allocations require developers to engage with TfL and avoid unacceptable impacts. There is an opportunity to provide substantial interchange improvements at Richmond Station. The deficiencies at North Sheen station are acknowledged but it seems very uncertain that this station can provide an attractive and reliable alternative to private transport given the difficulties of access here, particularly for those who cannot use the bridges.

Kew

- 4.1.24 The Kew area encompasses Kew Gardens and the riverside, along with the residential areas around Kew Gardens station and the mixed use areas around East Kew and Kew Meadows. Kew is enclosed on two sides by a bend in the River Thames. The area’s setting is strongly influenced by its scenic meandering river frontage and the significant open spaces of Old Deer Park and the Royal Botanic Gardens, Kew.
- 4.1.25 The river and related towpaths and open spaces are the defining features of the area. The Royal Botanic Gardens, Kew which was declared a UNESCO World Heritage Site in 2003. The area includes Old Deer Park which is a historically important and well used recreational and community area of the borough. There is a lively and attractive local shopping centre at Kew Gardens Station, presenting a distinctive gateway for those arriving by rail or underground, and there are also local parades at Kew Green and Sandycombe Road which provide for top-up shopping.

Table 4.13: Place-based strategy for Kew

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Draft Policy	O	O	-/O	O	+	++	++	++	O	++	++	++	++	+		
	<p>Interpretation Summary</p> <p>The policy for Kew focuses on the centres of activity, particularly Kew Gardens station, and looks to increase vitality and connectivity from here around the borough to those key landmarks and points of interest. It is aware of the need to protect and preserve riverside and parkland environments, particularly those of historic significance (Kew Gardens, Old Deer Park). Greening the area is important, creating links through street trees and open spaces, and providing open space where there are deficiencies. Again, Kew Gardens and the Old Deer Park are specifically mentioned. Traffic dominance on the two main roads is also addressed with a view to reducing this and its impact. East Kew is highlighted as a place where the sense of place could be improved.</p> <p>The allocations that can support the aspirations of the vision are located in East Kew, where two nearby allocations are set out for residential development with a view to reducing the road-based nature of the current land uses. Two further allocations support the replacement / renewal of sports facilities on the edge of the Old Deer Park, much closer to Richmond than the heart of Kew. In practical terms, these allocations offer little to the vision set out for the Kew area, but would replenish these services for the wider Richmond community. The outcomes of</p>															

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	the vision are uncertain in respect of environmental objectives because of the nature of the area, lacking in public transport alternatives, fragmented by major distributor roads and constrained by significant important heritage and open space considerations that do limit options for compact, dense or high development.															

4.1.26 There are four site allocations within this area:

31. Kew Retail Park, Bessant Drive, Kew
32. Kew Biothane Plant, Mellis Avenue, Kew
33. Pools on the Park and surroundings, Old Deer Park, Richmond
34. Richmond Athletic Association Ground, Old Deer Park, Richmond

Table 4.14: Sustainability Appraisal for the Kew Site Allocations

Site Allocation	Scoped Sustainability Objective and Impact														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Kew	0	-/0	-/0	0	0	+	+	+	0	+	++	++	0	+		
	<p>Interpretation Summary</p> <p>Plan allocations 32 – 34 are updated allocations from the adopted plan (SA26, SA22 and SA23 respectively). The Kew Retail Park is a new site allocation providing an opportunity for residential-led redevelopment with commercial uses along with improvements to public realm, active transport and links to the River subject to feasibility.</p> <p>The allocations all include previously used land (notwithstanding parts that are existing MOL) and would help with regeneration and renewal. All look to meet the needs of the area for housing and sports and leisure, and will contribute to well-being. The allocations in Kew East seek to provide new housing and reduce the car-dependent forms of development that currently exist, particularly the existing out-of-centre retail. Combined, the allocations could bring critical mass</p>															

	<p>and change perceptions, though travel patterns are well established and the sites are close to the A205 road, a busy, strategic circular route across South London. This road forms a barrier to active travel and to public transport alternatives. The south-western allocations will improve sports and recreation services and well-being, but are isolated sites whose form and development is likely to be defined by the setting and context in the ancient parklands. These outcomes are uncertain in the circumstances, but access to these sites seems likely to depend on private transport.</p>		
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Mortlake and East Sheen

- 4.1.27 The Mortlake and East Sheen area encompasses East Sheen town centre, the surrounding residential areas of Mortlake and East Sheen and Mortlake Riverside. This area is predominantly residential, between the River Thames and Richmond Park. Towards Richmond Park there are attractive tree lined streets with large houses, whereas north of Upper Richmond Road West the character is formed by terraced cottages and houses. Sheen Common and Palewell Common provide unique open areas for recreation and important wildlife habitats, along with Mortlake Common and the open space along the River between Chiswick Bridge and Barnes. Mortlake Brewery is a prominent part of the area’s heritage and a significant development opportunity since brewing operations ceased in 2015. The area as a whole is relatively well-connected, including Mortlake Station, although the railway lines and level crossings also form barriers to movement.
- 4.1.28 East Sheen is bisected by the A205 Upper Richmond Road West and this has a major impact on its appearance and character. Identified as a district centre, there is a mix of multiple and specialist shops, pubs, restaurants, cafes and a range of community facilities at the Sheen Lane Centre. Mortlake has limited shops and services on Mortlake High Street. There is a neighbourhood centre at White Hart Lane.

Table 4.15: Place-based strategy for Mortlake and East Sheen

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Draft Policy	O	O	O	+	O	O	+	++	+	++	+	+	++	+		
<p>Interpretation Summary</p> <p>The principal objectives for the area strategy are the town centres and parades, and ensuring good connections through a better public realm and a connected set of green spaces and places. This includes improving gateway points, such as Mortlake station. The strategy recognises the built heritage of the place, particularly around Mortlake Brewery and the riverside, though the relationship with the Commons and Parks on the south side of the area are also discussed. The aim of reducing the dominance of traffic is important, and considered in the context of improving the pedestrian experience in East Sheen and Mortlake Riverside.</p> <p>The allocations within the area have an opportunity to contribute to the overall vision. Largely located close to centres, the allocations are identified to deliver a range of housing, employment, educational and community needs to the area, which can help to diversify and improve services, raise the quality of life and accommodate new people into the</p>																

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	community. The brewery site is particularly significant in this respect, being close to Mortlake station, accessible to East Sheen, close to the river and offering a large site upon which a mix of built and open development can be accommodated. Uncertainties exist in respect of the environmental objectives, and the A205 will remain a significant challenge.															

4.1.29 There are four site allocations within this area:

- 35. Stag Brewery, Lower Richmond Road, Mortlake
- 36. Mortlake and Barnes Delivery Office, Mortlake
- 37. Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen
- 38. Barnes Hospital, East Sheen

Table 4.16: Sustainability Appraisal for the Mortlake and East Sheen Site Allocations

Site Allocation	Scoped Sustainability Objective and Impact														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Mortlake and East Sheen	O	O/+	O/+	+	+	O	+	++	+	++	+	++	++	++		
	Interpretation Summary Plan allocations 35 – 38 are updated allocations from the adopted plan (SA24, SA25, SA27 and SA28 respectively). The allocations are all previously used land and would benefit from regeneration or renewal (the Delivery Office has not been declared surplus). All would provide a range of land use, including housing, workspaces, education and community uses. The allocations for Barnes Hospital and Stag Brewery are significant; the allocations recognise the heritage and open space sensitivities around both and should be able to deal with these. The Brewery site has an opportunity to create new homes for people close to Mortlake and create new open spaces both alongside the river and a little inland.															

Barnes

- 4.1.30 The Barnes area encompasses Barnes centre and the riverside and the residential areas around Barnes Bridge and Barnes Common. The setting of Barnes is strongly influenced by the River Thames bordering Barnes on three sides, as well as the significant open spaces of Barnes Common and the London Wetland Centre. Key features include the Green, the pond and surrounding buildings and trees which create an outstanding village atmosphere; Castelnau with its fine houses which provide a dramatic approach to Hammersmith Bridge; and the former Harrods depository building, now converted into flats. The Bridge is an important link to key destinations for cyclists, pedestrians, vehicles and river traffic.
- 4.1.31 Barnes is identified as a local centre in the borough's centre hierarchy. Barnes High Street and Church Road have a good range of local shops and services and there is also an important local shopping area at Castelnau which serves a distinct residential area that has been amongst the most relatively disadvantaged in the borough.
- 4.1.32 There are no site allocations within this area.

Table 4.17: Place-based strategy for Barnes

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Draft Policy		+	0		+			++			+	+	+	+		
	<p>Interpretation Summary</p> <p>The strategy for Barnes centres on the role and function of the local centres and parades and ensuring that day-to-day facilities are available. This includes measures to pedestrianise parts of the main roads around the Terrace and Barnes High Street to increase the attractiveness of centres and promote active travel, and improve connectivity between centres and key locations such as the riverside and the Thames Path. Public realm can be improved alongside arrival points, principally the stations.</p> <p>Barnes has no allocations, and so has no uncertain impacts on environmental criteria as with other areas. There is the potential to reduce pollution through a focus on making centres attractive for day-to-day trips, reducing the need to travel, though the area is relatively isolated and alternatives to using private transport may be long in coming. A focus on centres does suggest benefits for centres, for access to services and hence for well-being. The policy does not address open space or climate change mitigation directly but does state that the Council will</p>															

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	continue to work with relevant partners to deliver flood projects in the Beverley Brook catchment.															

Summary of the Place-based strategies

SA Objective	Addressed in Area-based Strategies								
	Hampton & Hampton Hill	Teddington & Hampton Wick	Twickenham Strawberry Hill & St. Margaret's)	Whitton and Heathfield	Ham, Petersham & Richmond Park)	Richmond & Richmond Hill	Kew	Mortlake & East Sheen	Barnes
Prevent and reduce waste, minimise non-renewable resources	O	O	O		+	+	O	O	
Reduce pollution, minimise impacts of development	+	O	O	+	O	+	O	O	+
Reduce reliance on public transport	++	++	O/+	++	+	+	-/O	O	O
Tackle climate emergency	+	O	O	O	O		O	+	
Adapt to the effect of climate change	+	+	O/+	+			+	O	+
Protect and enhance existing habitats	+	+	O		++	+	++	O	
Promote high quality design and enhance heritage	+	O	+	+	++	+	++	+	

Protect and enhance parks and open spaces	+	++	+	++	++	++	++	++	++
Efficient use of land, buildings and infrastructure	O	+	++	+	++	+	O	+	
Provide high quality and affordable housing for local needs	++	++	++	+	+	++	++	++	
Promote healthy, safe and inclusive communities	+	++	O/+	+	++	+	++	+	+
Enable access to local services and facilities	+	++	++	+	+	++	++	+	+
Increase vitality and viability of town and local centres	++	++	O	+	++	++	++	++	+
Promote sustainable economic growth and employment opportunities	+	++	+	+	+	++	+	+	+

4.2 Testing the new Site Allocations

Table 4.18: 4 – Sainsbury’s Car Park, Hampton

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Proposed site allocation	O L	O L	O/+ L	O L	+ M	+ M	O M	+ S	+ L	++ L	+ S	O M	-/O L					
	<p>Interpretation Summary The allocation is away from town centres and public transport and close to major roads. It’s questionable, because of this, as to whether an allocation will reduce waste and be capable of encouraging public transport use and / or active travel. Improved permeability for pedestrians and active travel is encouraged which may go some way to address this. Services exist at Sainsbury’s but this may be limited. Development would, however, make better use of a large car park and allow enhancement to the river corridor as well as delivering new affordable homes.</p>														<p>The proposed allocation is likely to be the best use of the land, bringing affordable housing and being most able to encourage active travel. Retaining the site as it is, given changing patterns of use of stores of this type, appears to be the least favourable option.</p>	<p>The site allocation needs to work hard to ensure that residential development and the residents are well connected into the urban area through active travel connections, and that environmental benefits are gained along the river corridor.</p>		
Alt. 1 – No Allocation	O L	O L	- L			O M		O M	- L		- L	O M	- L					
	<p>Interpretation Summary No allocation would maintain the site as an out-of-centre style superstore. By its nature, the store is car dependent, but changing shopping habits may mean that the car park and / or store may be too large. Leaving the site as it is would not bring benefits to the wildlife corridor and river, though these may prosper anyway. Objectives relating to improved design and environmental objectives are not relevant, and the site is not delivering development needs for the borough.</p>																	
Alt 2 – Alternative Use	O L	O L	-/O L	O L	+ M	+ M	O M	+ S	O M		O M	O M	-/O L	+ L				
office/light industrial employment use with the river	<p>Interpretation Summary As an employment allocation, the outcomes would be similar to the proposed allocation, though patterns of travel to the site may be more reliant on car travel with the site being</p>																	

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
corridor enhancements	located within easy access of major roads. Development would bring improvements in the river corridor, but employment use would see the site out of use during non-working hours.															

Table 4.19: 5 – Hampton Telephone Exchange

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Proposed site allocation	O L	O L	O L	O L		+	+	O L	+	+	+	++ L	++ L	+				
	<p>Interpretation Summary The proposal is for employment, commercial, or community uses with residential on the upper floors and to the rear. While the allocation has a ‘poor’ PTAL, it is an approximate 10-minute walk to Hampton train station which would align with the 20-minute neighbourhood and ‘Living Locally’ concept. The proposed mixed-use scenario would contribute to the Hampton Area Strategy in enhancing the local centre of Hampton Village and generating an increased sense of vibrancy. The site is located in a conservation area and is adjacent to several listing buildings; the allocation requires a sensitive design treatment which would be an improvement on the current development.</p>														The proposed allocation would be the best outcome of the site's redevelopment, bringing more certain outcomes against the sustainability objectives.	The redevelopment will need to be design-led to ensure an active frontage can be adequately secured given the site context in a conservation area.		
Alt. 1 – No Allocation	O L	O L	O L	O L		O L	+	O L	O L	O L	O L	O L	+	O L				
	<p>Interpretation Summary The site is not yet surplus to requirements and is still in active use. In the absence of a site allocation and, should the site become surplus to requirements during the lifetime of the plan, it is possible the site would not be developed in the way envisioned with uncertain outcomes. However, as the site is located in a conservation area, any proposal would have to preserve or enhance the character of the area. Given the proximity to the local centre, it is likely that any redevelopment would bring positive contributions to the vibrancy of the area.</p>																	

Table 4.20: 9 – Teddington Police Station

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Proposed site allocation	O L	+	+	+		+	+	+	++ L	+	+	+	+	+			
	<p>Interpretation Summary The site allocation will meet some of the borough’s needs for social, commercial, community and residential development. It should secure improvements in the built form and respond to the townscape context, protecting and framing the nearby OOLTI. It will make better use of the land, but would have to remove the current building and bring more people onto the site, which may increase the amount of waste. The allocation supports the town centre, and residents will have easy access to a range of shops and services within walking distance. People working on the site can live locally.</p>														Making an allocation and setting out the objectives for the site, given it is known to be surplus and available for development, is the preferred option.	To secure benefits against the SA objectives, good design must be secured that responds to the plan’s strong environmental credentials.	
Alt. 1 – No Allocation	O L	O L	+	O L		O L	O L	O L	O L	O L	O L	O L	O L	O L	O L		
	<p>Interpretation Summary The building is understood to be surplus to requirements and will become vacant. Leaving the site unallocated leaves it open to development that may not respond to its context as well, and may fall below the expectations of the plan and its objectives. This may render some responses to the SA objectives uncertain, including the type of development coming forward. The policies of the plan would seek to maximise any benefits that can be gained from development given the great location, but this would be less secure with no allocation.</p>																

Table 4.21: 19 – Homebase, Twickenham Road, Hanworth

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Proposed site allocation	O L	O/+ L	O L	O L		+	+	O L	++ L	++ L	+	+		+			
	<p>Interpretation Summary The allocation is for residential with the flexibility for employment/commercial/community uses also. The site is located next to a major road, has a 'poor' PTAL score and is at least 30 minutes' walk from the nearest station. It is uncertain whether the site would be capable of encouraging more active travel or public transport use, though replacing the retail use may result in reduced trips by road. Given the site is outside of a centre boundary, the mixed-use element of the allocation would retain, and potentially enhance, local services for residents in the area. Potential for increased heights and massing would need to be considered in the context of the wider urban grain.</p>														The allocation ensures the best use of the site by providing much needed homes and would ensure local services and commercial or community elements would be retained in any redevelopment of the site.	How active travel or public transport use can be maximised would need to be considered in any redevelopment of the site. High quality design is needed to incorporate increased heights and massing on part of the site in the surrounding low-rise residential context, and minimise the impact of surrounding roads on future residents.	
Alt. 1 – No Allocation	O L	O L	- L			O L		O L	- L		O L	- L	O L	- L			
	<p>Interpretation Summary In the absence of the site allocation, the site may continue as an out-of-centre and car-centric retail development, or may be overlooked for development. If redevelopment would be proposed, the density and mix of uses envisaged in the allocation may not transpire and the development could be more car-dependent given the distance to the nearest train stations. The existing retail use is not protected as the site is outside of a centre, and so there is potential for a loss of local services in this scenario.</p>																

Table 4.22: 20 – Fulwell Bus Garage, Wellington Road, Twickenham

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Proposed site allocation	O L	+	+	+		+	+	+	+	+	+	++ L	O L	+		
	<p>Interpretation Summary The allocation seeks to retain the transport and social infrastructure uses on site and would support residential development. The site is close to Fulwell train station and opportunities to increase the permeability of the site would improve access to public transport for future residents and residents to the north of the site. Development would have to respond to the local context, including the present heritage assets, and consider the surrounding urban grain and wider context. Improvements to the public realm, landscaping, and biodiversity are also contained in the policy.</p>														<p>The allocation is the best use of land in retaining transport, social / community, and retail / office / commercial uses along with offering residential.</p>	<p>Careful consideration of design, public realm, permeability, and retention of social infrastructure uses will be required especially in the absence of a comprehensive redevelopment.</p>
Alt. 1 – No Allocation	O L	O L	- L			O L		O L	- L		O L	O L	O L	- L		
	<p>Interpretation Summary Given the number of sites in different ownership, a comprehensive redevelopment of the site would be unlikely in the absence of a proactive site allocation and many of the benefits highlighted, such as permeability, would be more difficult to be realised. The site is not in a centre so the existing retail use could be lost, as could the social and community uses if the ambulance and fire stations were deemed to be surplus to requirements.</p>															

Table 4.23: 22 – Whitton Community Centre

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Proposed site allocation	O L	O L	+	O L		O L	+	O L	+	O L	++ L	++ L		O L			
	<p>Interpretation Summary The allocation allows for the redevelopment of a community resource for social and community purposes, with an outside chance of residential development. Dependent on the proposal, the redevelopment could encourage more active forms of travel, or better access to public transport, and policies would encourage any scheme to respond to the local context, including nearby open spaces. Policies would also encourage a high standard of design. There are benefits in maintaining the site in community use, and improving those services for the people who use the building. The allocation encourages complementary and greater joined-up services with neighbouring community uses.</p>														The allocation brings benefits by defining the expectations on the site, and highlighting key constraints and expectations. The allocation is the preferred way forward.	Any proposals should look to find a design which makes the building attractive to use and be in, so increasing the chances that people will use it, and look to improve its accessibility.	
Alt. 1 – No Allocation	O L	O L	O L	O L		O L	O L	O L	O L	O L	O L	O L		O L			
	<p>Interpretation Summary The site is owned by the Council, and so any negative use / negative impact of the site is unlikely. However, an allocation sets out a statement of intent, whereas no allocation allows a more speculative approach. This brings a more uncertain outcome against the SA objectives.</p>																

Table 4.24: 26 – Former House of Fraser, Richmond

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
Proposed site allocation	+ S	O M	++ S	O M			++ M		++ M		O M	++ M	++ M	++ M				
	<p>Interpretation Summary The allocation is in the middle of Richmond town centre and the proposal refurbishes the existing building. The reuse of a significant building in the town centre helps the vitality and viability of the centre. This may in turn attract more people and the outcomes of this in terms of travel and pollution is uncertain. The proposal looks to be responsive to context and particularly the recognised assets of townscape heritage. The proposal also looks to provide a range of non-residential uses which can broaden out the appeal of the centre whilst providing a range of facilities, particularly the provision of convenience goods floorspace.</p>														The allocation provides guidance for the redevelopment of the building, which would be absent without the allocation.	Any development should look to maximise the environmental credentials of the use and the building.		
Alt. 1 – No Allocation	+ S	O M	O M	O M			++ M		++ M		O M	++ M	++ M	++ M				
	<p>Interpretation Summary The site already has a planning consent (granted late 2022). The outcome of the SA assessment is broadly similar to the assessment for the allocation. There is uncertainty in the event of the planning consent lapsing, which would leave the site with no specific steer in the plan.</p>														Whilst the building has a consent, if this lapsed, the building could be open to a speculative approach.			

Table 4.25: 27 – Richmond Telephone Exchange

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Proposed site allocation	O M	O M	O M	O M		+	+	+	+	++		++	++				
	<p>Interpretation Summary The allocation proposes a residential use on the site. The site is close to the town centre and the services it provides, and can be reached easily on foot. The policy seeks the reuse of the building, but this is not required. The presence of residents on the site is likely to increase movement to and from the building, bearing in mind its current use, and possibly increase noise. The policy seeks a sympathetic approach in respect of the heritage assets around and the location close to gardens.</p>														The allocation is the favoured approach if the objectives of the plan are to be met.	The site is close to the town centre, but in a residential area. It is within a conservation area and would be sensitive to a high building above the current height.	
Alt. 1 – No Allocation	O M	O M	O M	O M		+	O	+	O	+		+	+				
	<p>Interpretation Summary The building is not yet surplus to requirements, but the absence of an allocation leaves the site open to a speculative approach, and the outcomes may be more uncertain in respect of environmental and design considerations, though the policies of the plan would seek to deliver development in accord with the overall strategy. Given the site context, and proximity to the town centre, it seems likely that positive benefits would accrue for the town centre and for travel, and residential use seems the most probable use, which would meet borough needs.</p>																

Table 4.26: 28 – American University, Richmond

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation			
	1	2	3	4	5	6	7	8	9	10	11	12	13	14					
Proposed site allocation	+	O	-/O	O		O	++	+	O		O	O		++	M				
	M	M	M	M		M	S	S	M		M	M		M					
	<p>Interpretation Summary The allocation seeks educational use on the site to replace that which is vacating it. A social or community use is favoured if educational use cannot be found, though it is not clear what these would be. The heritage buildings would be retained, so reuse would limit waste and the valued heritage assets would demand a sensitive design, one which could emphasise environmental credentials. The site includes large areas of open land, though these features may be vulnerable to being lost to development. The site is distant from town centres and may be difficult to encourage active travel, particularly if students are coming from far afield.</p>														Having either an allocation or an end use in mind reduces uncertainty. The current allocation allows the current use to continue, and perhaps has the least risks, though residential or commercial development of the site could bring benefits for the site's accessibility or in ensuring the protection and use of open spaces and listed buildings.	This large and complex site has a number of attributes that suggest that careful planning for a future use would avoid uncertainties and poor outcomes. The site would benefit from a dedicated masterplan to consider these and find a balance that would best use the site and surroundings if it was to be vacated.			
Alt. 1 – No Allocation	O	O	-/O	O		O	O	O	O	O	O	O		O			M		
	M	M	M	M		M	M	M	M	M	M	M		M					
	<p>Interpretation Summary The lack of an allocation leaves the future of the site uncertain, and the lack of guidance may draw in speculative development that may be inappropriate to the setting and the heritage on site. Other policies would promote a sensitive approach, but this may be reactive rather than proactive.</p>																		
Alt 2 – Alternative Use	O	O	-	O		O	O	+	O		O	+	+	+	M				
	M	M	M	M		M	M	M	M		M	M	M	M					
commercial-led, non-residential, mixed use scheme with hotel / office	<p>Interpretation Summary A development for commercial uses would bring uncertain outcomes in respect of the use of the land and the protection of recognised assets, though a commercial enterprise is likely to want to capitalise on any unique attributes (such as the open space and characterful buildings) as a selling point. A hotel will bring people in from afar, potentially increasing traffic, though visitors may seek to use public transport or walk to get around, or use local</p>																		

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
	facilities and town centres beyond the hotel. If used as an office, this would likely increase commuter traffic in the vicinity.															
Alt 3 – Alternative Use	O M	O M	O M	O M		O M	++ M	+ M	O M	+ M	O/+ M	+ M	O/+ M			
wholly residential with retention of existing buildings	Interpretation Summary The development of the site for residential development would bring uncertainties without knowing the details of a scheme. Residential development is likely to want to capitalise on the attributes of the site, and protect open spaces and use historic buildings, though this may make the development expensive and less likely to accommodate affordable housing. Having residents on site may bring a critical mass, which may make public transport and active travel more feasible, and support the nearest town centres, particularly Richmond.															

Table 4.27: 30 – Homebase, East Sheen

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Proposed site allocation	O M	O M	O/+ M	O M	O M	+ M	O M	+ M	++ M	++ M	+ M	+ M	O M			
	<p>Interpretation Summary The site is a previously used site which currently has an out of centre retail unit present. This is likely to lead to car use, so the removal of this use may bring benefits. However, the absence of a concentration of day-to-day facilities nearby or good public transport options may limit active travel. Engagement with TfL is encouraged in order to prevent extra pressure on the local road network. The extant planning permission goes beyond the advice in the Urban Design Study, so the allocation may be too late to ensure sensitive design given the context, though height and density does make good use of the land. Development brings homes for the borough, and new open space can be created in a place where it is limited. The critical mass of people does have the potential to improve services and facilities in the vicinity over time.</p>														<p>It is arguable that the allocation is too late in respect of the extant planning consent. However, in the event of a lapsed permission or revision, the allocation will give a steer over the type of development sought, and likely improve the output for the site.</p>	<p>The site would benefit from a dedicated masterplan to consider its constraints and opportunities and find a balance that would best use the site and surroundings if it was to be vacated.</p>
Alt. 1 – No Allocation	O M	O M	O M	O M	O M	O M	O M	O M	++ M	++ M	O M	O M	O M			
	<p>Interpretation Summary The absence of a policy allocation leaves the site open to a speculative approach, which may not deliver some of the important aspects of a residential development that bring a sense of place and a quality of life. This includes those aspirations for open space, links to local travel options and services and connections to town centres.</p>															

Table 4.28: 31 – Kew Retail Park

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation											
	1	2	3	4	5	6	7	8	9	10	11	12	13	14													
Proposed site allocation	+	+	+	O	+	+	+	+	+	+	+	++	O	+	M	M	M	M	M	M	M	M	M	M			
	<p>Interpretation Summary The site allocation provide a statement of intent that helps to reimagine a site which currently promotes a car dependency but is likely to lose its appeal in the short term with changing retail habits. This site has the potential to use space more effectively and efficiently and reduce car travel to this place (though the A205 is likely to continue to be heavily used). The site demands a sensitive design, given the location close to the river, near to open space assets and with a potentially good connection to Kew Gardens station. Redevelopment of the retail offer may also make this more suitable for local people (rather than car based) though there is a danger this might undermine established centres elsewhere.</p>														<p>A proactive approach through a site allocation is the favoured way to secure improvements in this site through a planned consideration of the opportunities and constraints. The site needs a holistic approach beyond the site itself to deliver wider improvements.</p>	<p>Plan policies, the relevant SPD and the Urban Design Study should be used to ensure that the SA objectives are positive in terms of the design of the scheme and the environmental credentials can be achieved. The presence of the strategic A205 is a significant issue, and active travel needs to be promoted particularly in enabling a link to Kew Gardens station.</p>											
Alt. 1 – No Allocation	O	-	-		O	O		O		O	O	O	-	-			M	M	M	M	M	M	M	M	M		
	<p>Interpretation Summary With no allocation, there may be no incentive to change the site, or it may be open to speculative development that may deliver poorer outcomes. Without development, the site may decline, or continue to attract car based customers from further afield if the retail offer were to remain or be enhanced through permitted development or incremental change. Speculative development may bring residential or other development, but these outcomes are uncertain. It is also uncertain as to how the absence of an allocation could improve open space, flood prevention or links to the rail network at Kew Gardens.</p>																										
Alt 2 – Alternative Use	+	+	O	O	O	+	O	+	+	+	O	O	O	O	M	M	M	M	M	M	M	M	M	M			

Option	Scoped Sustainability Objective and Impact (temporal - short/medium/Long term)														Conclusions	Mitigation
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
wholly residential with small scale commercial use	<p>Interpretation Summary</p> <p>A residential allocation may have similar benefits to the present allocation, though much would depend on the scheme, and the application of other policies of the plan to bring the required standard. A wholly residential scheme may be isolating given the presence of the A205, making active travel connections to local facilities difficult. Removing the retail element may reduce travel to and from this site, but residents would still generate traffic. A scheme would need to make effective links beyond the site, especially to Kew Gardens station and the shops nearby.</p>															

4.4 Overview of findings

- 4.4.1 The Place-based Strategies bring to the plan a structure and place-based emphasis that was absent in the adopted plan. The structure means that the site allocations can be seen as contributing to the overall area strategy, and this has allowed the sites and the strategies to be assessed considering one another, but also for their individual strengths and weaknesses to be appraised.
- 4.4.2 The Strategies also work alongside the objectives for the plan, and would be subject to the policies of the plan. This means that the overall emphasis of the place-based area strategies fits with the direction of travel of the plan, meaning an aspiration to meet development needs within an ambitious environmental agenda. This is reflected across the place-based strategies in an emphasis on strengthening centres, targeting previously used land for development, protecting and enhancing assets of acknowledged importance (both built and natural) and seeking means of reducing the reliance of car travel through the promotion of active travel and public transport. Whilst land available for development is restricted, the allocations made are expected to fall into this framework. The limited availability of land can sometimes mean that their locations – such as the Homebase site in Hanworth or the Fulwell bus garage - are not ideally located to limit the reliance on private transport or support established centres, though they clearly contribute to development needs in a constrained overall picture.
- 4.4.3 Across the strategies, the need for development brings uncertainty about the impact in terms of waste and pollution, but this stems primarily from the addition of people and the nature of development and construction. Dependent on the details of development and its impact, there may be benefits of having more people in critical mass and improved services that do improve matters. The quality of development and the extent to which it embraces sustainable construction techniques and energy provision will also come down to how the policies are applied, though the plan does contain ambitious ideas often above and beyond London Plan expectations.
- 4.4.4 Issues were explored in Twickenham, which has the highest number of individual allocations. Four of the ten allocations concern the development needs of significant institutions, all looking to expand. This includes two educational institutions and two rugby stadia. All of these places attract visitors and traffic from beyond the borough, and present major challenges in terms of meeting sustainability targets. They also offer, in some cases, land uses that could compete with Twickenham town centre, which will need careful consideration. The Twickenham riverside allocation could make for an attractive public destination that supports the town centre but, if successful, could see more people looking to get to the town centre. Two new allocations aim to meet some of the development needs of the borough, particularly in terms of housing need, but also for other uses. These allocations, though, are quite distant from their nearest local centres so some benefits are offset by uncertainties about their wider impacts, for instance on active travel and the need for private transport.
- 4.4.5 The Place-based Strategy for Ham is focused on improving local services, but the allocations available in Ham are not close to the main parade of shops. The major opportunity lies at Ham Close, adjacent to the Village Green, but the area generally is poorly connected to the wider area and car travel may remain an essential for many people for work, shopping and other pursuits.

- 4.4.6 The Place-based Strategy for Richmond is focused on this town centre, in particular on making the town centre more vital and more attractive and the site allocations also seek to support this with residential development. The strategy includes two large allocations in North Sheen which do pick up two out-of-centre style retail units for redevelopment. Whilst this is positive, North Sheen itself lacks public transport and local shops and services, and this was seen as an uncertainty in the assessment whilst the need to address this is clearly emphasised.
- 4.4.7 The Place-based Strategy for Kew is dominated by the open spaces, the Kew Gardens site and the shops and services around Kew Gardens station, but the allocations within the strategy are scattered. Whilst two – in East Kew – seek to repurpose underused land for commercial and residential purposes, two support redeveloping recreational land which is distant from core centres. Kew suffers from the absence of a strong centre, and making this work will require determination.
- 4.4.8 Eleven new allocations were assessed and the broad outcome was that the allocations are sensible in looking to deliver development in accord with the ambitions of the plan. Such ambitions would be less likely to be achieved with no allocation, simply because the plan provides a framework and set of expectations from development. In some cases, different land uses were tested, but many of the outcomes against the objectives remain dependent on what exactly is proposed and how the policies might be applied.

Summary of issues for the Place-based Strategies and Site Allocations

- The Place-based Strategies provide focus for place-based development, and the site allocations feed into these strategies.
- The Place-based Strategies generally provide benefits in terms of meeting a balance between development and protection of acknowledged assets (built and natural), though the actual impact is dependent on how policies are applied.
- Some areas have particular issues: Twickenham has allocations at major institutions which provide challenging scenarios for travel and for the town centre that need careful consideration; Ham and North Sheen are relatively isolated and may struggle to see a shift from car use to other uses. Similarly, Kew lacks a strong focus, and the allocations within the Place-based Strategy are dispersed and could perpetuate established travel patterns dominated by car use.
- The new allocations bring certainty to available sites, but outcomes remain uncertain without knowing the details of any final proposal.
- Where mitigations are required, the plan works hard to identify these and describe how the best outcomes could be achieved through collaborative approaches to site development.

5.0 Concluding remarks

5.1 Conclusions, limitations and consultation

5.1.1 Conclusions drawn from the Sustainability Appraisal are set out after each set of matrices within sections 3 and 4.

5.1.2 Collection of baseline data is a continuous process as new information becomes available. Information gaps need to be identified. Some of the information may lack detail, may not be collected regularly, or may be unreliable. In addition, data in some key areas is unavailable at borough level, only available for a fee or subject to confidentiality or copyright restrictions.

5.1.3 Where possible the most up to date evidence has been used to assist in the predicting of Local Plan effects on sustainability objectives, however gaps in knowledge and data are acknowledged. Uncertainties and assumptions across the SA included:

- The exact design of future development proposals is subject to planning approval and largely unknown at this stage.
- The exact scale of energy and water demand, waste production and emissions resulting from development are unable to be quantified. It will depend on a number of factors including: the design of new development; waste collection and disposal regimes; and individual behaviour with regard to recycling and reuse.
- The extent to which job creation is locally significant will depend on the type of jobs created (in the context of the local labour market) and the recruitment policies of employers.
- The level of investment in community facilities and services that may be stimulated by new development is uncertain at this stage and will in part be dependent on the policies of the Local Plan, site specific proposals and viability.
- The exact scale of greenhouse gas emissions associated with the implementation of the policies and proposals contained in the Local Plan will be dependent on a number of factors including: the design of new development; future travel patterns and trends; individual energy consumption behaviour; and the extent to which energy supply has been decarbonised over the plan period.

5.1.4 The sustainability effects of implementing the Local Plan must be monitored in order to identify unforeseen adverse effects and to be able to undertake remedial action. Stage E of the SA process requires the monitoring of SA objectives. Although this stage is not required until the plan is put into effect, the consideration of monitoring and indicators should be undertaken throughout the process and is integral to the compiling of baseline information. The SA will also provide a monitoring framework that will identify sustainability effects. It is intended that they will help form the basis of the Authority's Monitoring Report (AMR) and will be monitored on a regular basis following the adoption of the Local Plan.

- 5.1.5 The following stages will be undertaken in completing the sustainability appraisal process:
- Stage D: Consulting on the SA report.
 - Stage E: Monitoring the significant effects of implementing the Plan.

Appendix One: SA Assessment Framework and Decision Making Criteria

Sustainability Appraisal objective	Decision making criteria	Assessing of Local Plan Policies
1) To prevent and reduce the amount of waste, and minimise the use of non-renewable resources.	<ul style="list-style-type: none"> • Will it prevent waste wherever it occurs? • Will it promote sustainable waste management, following the waste hierarchy, and reduce consumption of materials and resources? • Will it increase waste recycling? 	Analysis of: <ul style="list-style-type: none"> • Existing use and buildings • Location • Vacant sites • Derelict sites • Potential options for future land uses
2) To reduce pollution (such as air, noise, light, water and soil), improve air quality and minimise impacts associated with developments.	<ul style="list-style-type: none"> • Will it impact on natural resources, soil, air and water quality? • Will it reduce emissions of pollutants? • Will it impact on locations that are sensitive to air pollution? • Will it impact on noise levels? • Will it lead to more light pollution? • Does it improve water quality? • Will it safeguard soil quality and quantity? 	<ul style="list-style-type: none"> • The whole borough is an Air Quality Management Area • Analysis of potentially contaminated land and past industrial land uses • River Thames Policy Area • River Crane corridor
3) To reduce reliance on private transport modes, encourage alternatives to the car, and enhance safer routes and permeability for walkers and cyclists.	<ul style="list-style-type: none"> • Will it impact on traffic congestion? • Will it encourage the use of public transport? • Will it encourage walking and cycling? • Is the proposal/land use in a location with appropriate PTAL level? • Will it make use of existing transport infrastructure? • Will it encourage alternatives to the car? 	Analysis of: <ul style="list-style-type: none"> • PTAL level • Town centre boundary • Area of Mixed Use • 1 km distance to primary school • 3 km distance to secondary school • 1 km distance to GP surgery • 400m distance to Area of Mixed Use • 400m distance to town centre • Public Right of Way

Sustainability Appraisal objective	Decision making criteria	Assessing of Local Plan Policies
4) To tackle the climate emergency by reducing greenhouse gas emissions in new developments and promoting zero carbon technologies and renewable energy.	<ul style="list-style-type: none"> • Does it maximise energy efficiency? • Will it reduce greenhouse gas and particularly carbon dioxide emissions by reducing energy consumption? • Does it involve the incorporation of zero- and low carbon technologies? • Does it incorporate renewable energy technologies? • Will it include energy recovery? • Is it in keeping with the principles of the Council's Sustainable Construction Checklist SPD? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses • Monitoring of Sustainable Construction Checklist target measures
5) To adapt to the effects of a changing climate by protecting and managing water resources, and avoiding or reducing flood risk from all sources	<ul style="list-style-type: none"> • Will the proposal be affected by flooding, i.e. is it within zone 2, 3a or 3b? • Will it lead to increased surface water flooding? • Will it lead to sewer flooding? • Will it impact or increase the risk of flooding to other people and property? • Will it promote and include climate change adaptation measures? • Will it include measures to reduce water consumption? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Location within flood zone • Surface water maps • Localised flooding maps, where available
6) To protect and enhance existing habitats, species and biodiversity, and to seek to increase these where possible.	<ul style="list-style-type: none"> • Will it impact on national, regional or local BAP habitats and/or species? • Does it affect a site designated for nature conservation purposes? • Will it impact on access to nature? • Does it support ecosystems and lead to any enhancements in biodiversity, particularly in non-designated sites? • Will it lead to a biodiversity net gain? • Will it impact on existing networks of open spaces and create new green spaces? 	<p>Analysis of:</p> <ul style="list-style-type: none"> • Tree Preservation Orders • Sites designated for nature conservation purposes, including SSSI and SINC • Existing on-site habitats and biodiversity features (NB: If development is proposed on protected or BAP species sites, local authorities should consult the Natural England Standing Advice)

Sustainability Appraisal objective	Decision making criteria	Assessing of Local Plan Policies
	<ul style="list-style-type: none"> • Will it lead to a degradation or fragmentation of the green spaces? 	
7) To promote high quality and sustainable urban design, including preserving and where possible enhancing the borough's heritage assets and their settings.	<ul style="list-style-type: none"> • Will it affect the significance of heritage assets through direct impacts or impacts on their setting? • Will the design enhance the local character? • Have opportunities that make a positive contribution to the local character and area been identified? • Will it impact on any potential archaeological remains? • Will it impact on the Kew World Heritage Site, its buffer zone and its wider setting? 	Analysis of: <ul style="list-style-type: none"> • Conservation Area(s) • Listed Building(s) • Building(s) of Townscape Merit • Royal Botanic Gardens Kew World Heritage Site • Archaeological Priority Area • River Thames • River Crane • Historic Parks & Gardens
8) To protect and enhance the quality and range of parks and open spaces as part of the wider green infrastructure network.	<ul style="list-style-type: none"> • Will it increase or decrease public open space deficiency? • Will it lead to loss or degradation of designated spaces such as Green Belt, MOL, Local Green Space or OOLTI? • Will it improve connectivity between existing open spaces? • Will it encourage the enhancement of the wider green infrastructure network? 	Analysis of: <ul style="list-style-type: none"> • Existing use and buildings • Metropolitan Open Land • Green Belt • Local Green Space • Other Open Land of Townscape Importance • Historic Parks & Gardens • Open spaces assessment
9) To ensure development makes efficient use of land, buildings and infrastructure.	<ul style="list-style-type: none"> • Will it optimise on the use of previously developed land, buildings and existing infrastructure? • Will it lead to a loss of greenfield sites or back garden land? • Does it incorporate sustainable design and construction practices? • Is there remediation of contaminated land? 	Analysis of: <ul style="list-style-type: none"> • Existing use and buildings • Vacant site • Derelict site • Potential options for future land uses • Potential contaminated land
10) To provide a range of high quality and affordable housing to meet local needs	<ul style="list-style-type: none"> • Will it increase the number of homes? • Will it increase the number of affordable homes? • Will it reduce the number of unsuitable/unfit homes? • Does it increase accessibility for wheelchair users? 	Analysis of: <ul style="list-style-type: none"> • Existing use and buildings • Potential options for future land uses • Conservation Areas

Sustainability Appraisal objective	Decision making criteria	Assessing of Local Plan Policies
11) To promote healthy, safe and inclusive communities, and promote equal opportunities.	<ul style="list-style-type: none"> • Will it impact on access and/or provision of health facilities? • Will it encourage healthy life styles? • Does it follow Security by Design principles? • Will it contribute to a reduction in the actual crime level? • Will it contribute to a reduction in the fear of crime? • Will it be likely to increase public well-being? 	Analysis of: <ul style="list-style-type: none"> • Existing use and buildings • Area of relative disadvantage • Potential options for future land uses
12) To ensure access to local services and facilities, including local shopping, leisure facilities, sport and recreation opportunities.	<ul style="list-style-type: none"> • Will it improve accessibility to key local services? • Will it impact or lead to a loss of essential services and community facilities? • Will it enable people to stay independent? • Does it improve access for all, such as for those with limited mobility, wheelchairs? • Does it provide any facilities or services that can be accessed by all? 	Analysis of: <ul style="list-style-type: none"> • Area of relative disadvantage • 1 km distance to primary school • 3 km distance to secondary school • 1 km distance to GP surgery • 400m distance to Area of Mixed Use • 400m distance to main town centre • Public open space deficiency • Town Centre Boundary • Area of Mixed Use • Public Right of Way
13) To increase the vitality, viability and uniqueness of the borough's existing town centres, local centres and parades.	<ul style="list-style-type: none"> • Will it promote and add to the vitality and viability of town centres? • If the site is located in a town centre, will it include retail or town centre uses? • Does it reinforce a centres' retail role? 	Analysis of: <ul style="list-style-type: none"> • Employment use • Town Centre Boundary • Area of Mixed Use • Key shopping frontage • Secondary shopping frontage • Frontage/area subject to specific restrictions
14) To promote sustainable economic growth and employment opportunities.	<ul style="list-style-type: none"> • Will it improve business development? • Will it impact on the local economy? • Will it lead to local economic growth? • Does it provide jobs? 	Analysis of: <ul style="list-style-type: none"> • Employment use • Town Centre Boundary • Area of Mixed Use

Sustainability Appraisal objective	Decision making criteria	Assessing of Local Plan Policies
	<ul style="list-style-type: none"> • Will it meet local business needs? • Is it commercial space, of suitable size and in an appropriate location? • Will it increase employment opportunities? • Will it increase training and skilled employment? 	<ul style="list-style-type: none"> • Key Business Areas • Locally Important Industrial Land and Business Park