

Soundness Self-Assessment Checklist Local Plan (Regulation 19) Version

London Borough of Richmond

18 January 2024

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 4: LOCAL PLAN SOUNDNESS & QUALITY ASSESSMENT

Why you should use this part of the toolkit

The purpose of this assessment is to provide a ‘mock’ examination - as far as that is possible - of the drafts of your local plan policies update. It is intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

How to use this part of the toolkit

There are 50 ‘key questions’ in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a partial plan policies update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the ‘tests’ as follows. Is the draft local plan update:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#) and other statements of national planning policy, where relevant.

For some elements, particularly those concerning clarity, you will also need to consider yourself as an end user of the Local Plan policies update.

Provide a brief answer to each question cross referring to evidence that has informed or supports the local plan policies update in order to justify your reasoning and the score you have attributed. Identify any likely implications of not changing your approach or ways in which you may potentially improve the score either through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. But remember that the local plan policies update doesn't need to be supported by reams of evidence. Evidence needs to be proportionate, clear and robust in line with [PAS advice on proportionate evidence](#).

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents.

		Assessment
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
Growth Strategy		
A	In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area	The Plan is based around ten themes to achieve the Vision, adopting a coherent placemaking approach. Nine Place-based Strategies and Site Allocations are expected to provide 4,110 new homes over the next 10 years. The overarching spatial strategy continues to direct major development to the five town centres or places that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, and to support ‘Living Locally’ through the network of local centres, neighbourhood centres and parades spread across the borough, with incremental intensification of existing communities as envisaged by the London Plan.
B	In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update	The Open Land Review and Urban Design Study were undertaken to inform the Plan, together forming the basis for a holistic understanding of the borough’s constraints and capacity for growth. The spatial strategy builds on the concept of the 20-minute neighbourhood, complete, compact and connected neighbourhoods where most things people need are an easy walk or cycle away. The focus remains on steering major development into the five town centres – Richmond, Twickenham, Teddington, Whitton and East Sheen. The London Plan directs incremental intensification to existing residential areas within high Public Transport Accessibility Levels or close to stations or town centres.
C	List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery	The nine Place-Based Strategies set out how each area will manage change, rather than necessarily promote growth, they are: <ul style="list-style-type: none"> • Hampton & Hampton Hill • Teddington & Hampton Wick • Twickenham, Strawberry Hill & St Margarets • Whitton & Heathfield • Ham, Petersham & Richmond Park • Richmond & Richmond Hill • Kew • Mortlake & East Sheen • Barnes

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		The Local Plan does not anticipate growth to occur equally across these locations. The Urban Design Study (2021 and 2023 update) identified capacity for growth in the borough and set out an overall development strategy (Map 4.2 in the Plan). The indicative ranges of housing for broad locations are set out in Policy 10 New Housing and Table 17.1. The Local Plan is not reliant on any single Site Allocation, nor on the provision of specific infrastructure required to support the delivery of the growth it plans for.				
1.	Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is ‘an appropriate strategy’ within the context of paragraph 35 of the NPPF?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The spatial strategy for delivering growth is clearly articulated and the strategy foregrounds Living Locally where most things a resident needs can be reached within a 20 minute walk or cycle; and our towns and local centres are supported to adapt and respond to change. Living Locally (Policy 1) and the nine Place-based strategies (as listed in question above) are linked to realising the ten themes outlined in the vision and strategic objectives. Site Allocations are further identified within the Place-based strategies to deliver the overall Spatial Strategy (Policy 2). Place-based Strategies and Site Allocations are set out in detail in chapters 5 to 14 and considered cumulatively in Policy 10 in terms of new housing, along with provision to meet retail and leisure needs (chapter 18) and employment needs (chapter 19). Policies relating to topics provide further guidance for how sustainable development is to be delivered in the borough of Richmond. Both topic-based policies and the Place-based Strategies are assessed against reasonable alternatives as part of the Sustainability Appraisal of the Publication Local Plan (2023) , which considers how they will achieve sustainable development.				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
2.	Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score:				

	KEY QUESTIONS	<p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>The amount of development that has been identified within the Local Plan is set out by broad locations in Policy 10 Part B, however not for individual site allocations. The supporting text at paragraphs 17.1-17.7 includes the housing trajectory and sets out that the policy reflects the broad expected pattern of future housing land supply. The Site Allocations across the borough comprise key sites that will assist with the delivery of the spatial strategy of the Plan. The Site Allocations in the Local Plan are not prescriptive with regards to specific density or minimum/maximum housing numbers. They set out a vision but are not overly prescriptive to allow for flexibility and in particular the London Plan approach to optimise site capacity, which needs to be determined through detailed site-specific discussions. The latest housing Authority Monitoring Report (reviewed annually) sets out that the borough is on course to meet and exceed the strategic dwelling requirement over a ten year period, which is considered deliverable and justified, and there are further details in the Housing Delivery Background Topic Paper.</p>				
	<p>Implications of taking no further action: –</p>					
	<p>Mitigation / Action required (if necessary) to move scale to right: –</p>					
	<p>Reviewer Comments:</p>					
<p align="center">3.</p>	<p>Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?</p> <p>If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?</p> <p>Does the level of housing provide for an appropriate and justified buffer?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Planning Practice Guidance (Housing and economic needs assessment, Paragraph: 034 Reference ID: 2a-034-20201216) is clear that the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual boroughs, with the Government clarifying the local housing need uplift will only be applicable once the next London Plan is being developed (set out in https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system). In addition, the London Plan paragraph 1.4.4 states that Boroughs can rely on these targets when developing their Development Plan Documents and are not required to take account of nationally derived local-level need figures.</p> <p>Accordingly, the Plan seeks to exceed the ten year housing target of 4,110 homes (and can be rolled forward for future years, as set out at paragraph 17.1 in the Plan, until it is replaced by a revised target in a new London Plan).</p> <p>The Authority Monitoring Report (AMR) includes a housing trajectory, that is annually updated, and identifies a supply of specific deliverable sites sufficient to provide five years supply of housing. This is assessed against the</p>				

		Assessment				
KEY QUESTIONS		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		housing requirements together with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. The Housing Delivery Background Topic Paper sets out information on housing delivery including the latest trajectory.				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: Government guidance is clear that the responsibility for the overall distribution of housing need in London lies with the Mayor. A commitment is made to review the Local Plan against any revised London Plan targets.				
		Reviewer Comments:				
4.	<p>Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: No Green Belt release is required to deliver the Richmond Local Plan. The Green Belt was reviewed in the Open Land Review (Green Belt, MOL, LGS and OOLTI) (2021, and Errata 2023) which concluded that the Green Belt in the borough scored well against the purposes for including land in Green Belts as set out in the NPPF; therefore, no change is proposed to Green Belt boundaries.				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
5.	<p>Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Many site allocations are carried forward and updated from the existing adopted Local Plan (2018) or the Twickenham Area Action Plan (2013). A call for sites was conducted alongside the ‘Direction of Travel’ consultation from 24 February to 5 April 2020, which informed the Regulation 18 Local Plan including the Place-based strategies and site allocations, with the addition of eight new sites that may come forward during the Plan period. In response to comments raised on the Regulation 18 Local Plan, there were three new Site Allocations added - Hampton				

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		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> <p>Telephone Exchange, Homebase at Hampton, and Fulwell Bus Garage. Two site allocations were removed - Hampton Delivery Office and Twickenham Police Station.</p> <p>A Whole Plan Viability Assessment (2023) was undertaken to test the ability of proposed development in Richmond upon Thames to accommodate emerging policies in the Richmond Local Plan (Regulation 19) alongside prevailing rates of Community Infrastructure Levy ('CIL') in the Council's adopted Charging Schedule (subject to indexation). The Sustainability Appraisal for the Draft Local Plan (Regulation 19) (July 2023) appraises the Place-based Strategies and site allocations against a framework for the delivery of sustainable development.</p> <p>The borough's historic environment and its protected open spaces significantly limit the opportunities for development within the borough, as a result there are limited suitable sites in the borough. Site allocations have been informed by the evidence base, including: Urban Design Study (2021 and 2023 update) Local Housing Needs Assessment (2021 and 2023 update) Employment Land & Premises Needs Assessment (2021 and 2023 update)</p> <p>Implications of taking no further action: –</p> <p>Mitigation / Action required (if necessary) to move scale to right: –</p> <p>Reviewer Comments:</p>				
6.	Does the local plan policies update identify a housing requirement for designated neighbourhood areas?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Council first designated the Ham and Petersham Neighbourhood Area and Forum on 16 January 2014; it was re-designated on 9 March 2020. The Ham and Petersham Neighbourhood Plan was formally adopted by Council on 22 January 2019. As a result, the Plan now forms part of the borough's statutory development plan and will be used alongside the Council's own planning documents to determine planning applications in the Neighbourhood Area. The housing requirement is identified in Chapter 3, Policies H1 and H2. The neighbourhood plan supports the development of previously developed brownfield sites, and 3 proposed sites are shown (pages 103-104). There are policies for particular sites and where relevant these are Site Allocations in the Local Plan – Ham Close (Site Allocation 23) and Cassel Hospital (Site Allocation 24). The relationship of the Neighbourhood Plan with the Local</p>				

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		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>Plan is set out in the Place-based Strategy for Ham, Petersham & Richmond Park, with the vision for the place based on the Neighbourhood Plan.</p> <p>The indicative broad locations in Table 17.1 in the Local Plan set out that for the Ham & Petersham Neighbourhood Area approximately 300-400 units are expected over the next ten years, noting this covers the wards of Ham, Petersham and Richmond Riverside which extends further than the neighbourhood area including Richmond Hill.</p> <p>Implications of taking no further action: –</p> <p>Mitigation / Action required (if necessary) to move scale to right: –</p> <p>Reviewer Comments:</p>				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
7.		<p>Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?</p> <p>Reason for score: Site allocations do not prescribe a quantum of development; however, they do include a proposed vision for the site, including restrictions, opportunities and expected timescale. Each site allocation includes the following sections: site area; land ownership; existing land uses; Urban Design Study Area; Village Plan Guidance; Neighbourhood Plan; London Plan designations; Type of centre; transport/highways; Air quality; Flood risk; Trees; Views; Heritage assets; Access to open space; Relevant planning history; Description of the site; Neighbour context; Vision and expected implementation timescale. The site allocations allow flexibility for proposals to be brought forward, and for the London Plan approach to optimise site capacity, in recognition of the fact that this would require detailed site-specific evidence as well as detailed viability analysis.</p> <p>Implications of taking no further action: –</p> <p>Mitigation / Action required (if necessary) to move scale to right: –</p> <p>Reviewer Comments:</p>				
D		<p>What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period?</p> <p>List these targets and the evidence source for this 'need' target?</p> <p>For economic/employment land, the identified need is derived from the Employment Land and Premises Needs Assessment 2021 and update 2023. The GLA Job growth projections 2016, estimated the requirement for 0.5ha per annum of industrial land, to accommodate 100 industrial jobs per annum, over the period 2016 to 2041, which identifies the need for 60,000 sqm net additional space for industrial uses (para 4.19 and 19.31).</p> <p>In relation to office floorspace, the Borough Employment Land & Premises Needs Assessment identifies for the forecast period 2019-39 a shortfall of approximately 23,000 sqm of office floorspace, and the Local Plan should seek to accommodate an additional minimum of 199 jobs per annum (para 19.15).</p>				

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8.	Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan seeks to deliver these targets and make effective use of land, with a spatial strategy to ensure opportunities for development to come forward by optimising the use of sites, however it is recognised that there is limited land supply and constraints.				
		For housing, capacity is indicated within Policy 10, which sets out the indicative ranges for broad areas in the borough in Table 17.1. A housing trajectory is published and annually updated, in the Council’s Authority Monitoring Report (AMR). This is required by the NPPF and identifies a supply of specific deliverable sites sufficient to provide five years supply of housing. This is assessed against the housing requirements together with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.				
		The Plan seeks to protect existing employment floorspace and support new office development within five town centres primarily and industrial space on designated Locally Important Industrial Land and Business Parks. Policy 23 Offices and Policy 24 Industrial land adopt a presumption against the loss of office and industrial land. There are no specific employment land site allocations, however, a number of Site Allocations identify the need for employment generating and commercial uses, where appropriate such as those located in town centres.				
		Development (and any losses) will be monitored as part of the Authority Monitoring Report.				
		The AMR is used to identify and monitor delivery and trends in both housing and employment.				
Implications of taking no further action: –						
Mitigation / Action required (if necessary) to move scale to right: –						
Reviewer Comments:						
9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

		Assessment				
KEY QUESTIONS		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>Reason for score: The borough’s Infrastructure Delivery Plan (April 2023) analyses and assesses the existing infrastructure provision, the current shortfall and identifies the existing and future needs and demands for the borough to support new development and a changing population for the plan period up to 2039. The Plan covers social and community infrastructure, emergency services, green and blue infrastructure, utilities and waste, transport infrastructure and heritage assets. For example, there is a need for nursery, education and health provision across the borough, and developer contributions are necessary to deliver future infrastructure requirements, set out in various policies across the Plan. However, there are no elements of infrastructure that are critical ‘show stoppers’ to development. An update to the IDP is included as a submission document.</p>				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
		<p>Reviewer Comments:</p>				
10.	<p>Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated?</p> <p>Have you identified the extent of any funding gap? If so, are you able to explain why you are confident that any gap can be addressed?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Infrastructure Delivery Plan (April 2023) provides a snapshot of the infrastructure need and identified future delivery within the borough, including details on costs where available. The Council’s Capital Programme is updated every year (see Finance Policy & Resources Committee Report) in line with the revenue strategy and the impact of the local government finance settlement on the resources available that inform the Council’s Medium Term Financial Strategy and the Asset Management Plan. It has been difficult to establish medium and longer term plans due to uncertainty over funding and service provision in public and private sectors, and there may be a future update or addendum. An update to the IDP with an up-to-date snapshot of funding costs is included as a submission document. There are relevant delivery partners identified, but particularly in the current market with high levels of inflation, there remain uncertainty about future funding sources and developer contributions are necessary towards delivery of future infrastructure requirements.</p>				

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		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
	Process and Outcomes (see also Toolkit Parts 2 and 3)					
E	What are the cross boundary strategic matters affecting your local plan policies update? List these.	<p>These matters are set out in detail in the Duty to Cooperate Statement (July 2023) and updated statement to accompany submission (January 2024). The Statement(s) of Common Ground with a number of neighbouring authorities and other Duty to Cooperate bodies are submission documents. The Duty to Cooperate Statements identify the following key cross boundary issues:</p> <ul style="list-style-type: none"> • Housing continues to be a strategic, cross-boundary issue including whether there is any unmet need, and there will need to be continued liaison between Elmbridge, Spelthorne, Hounslow, Kingston and the GLA; • Richmond will continue to liaise with the GLA and neighbouring boroughs on research on gypsy and traveller needs; • Loss of employment floorspace is a shared concern, although not a strategic issue; • Transport infrastructure has previously been identified as a cross-boundary issue with Kingston and the GLA/TfL, and whether the transport impacts arising from the Local Plan have been modelled is a strategic and cross-boundary issue with TfL, National Highways, Hounslow and Elmbridge. Richmond outlined a strong emphasis on active travel, particularly walking and cycling, which fits with the living locally approach; and • The review of the West London Waste Plan has commenced. 				
11.	Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: These matters are set out in detail in the Duty to Cooperate Statement July 2023 and updated statement to accompany submission (January 2024) and the Statements of Common Ground with a number of neighbouring authorities and other Duty to Cooperate bodies. The Council has prepared a series of background topic papers on Transport, Housing Delivery, Affordable Housing and Biodiversity Net Gain to address comments raised, including through Duty to Cooperate discussions, and shared drafts of these with the relevant Duty to Cooperate				

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		<p>bodies ahead of submission to engage positively and provide the opportunity to clarify areas of agreement and difference.</p> <p>Implications of taking no further action: –</p> <p>Mitigation / Action required (if necessary) to move scale to right: Should unexpected issues arise, these can be addressed through further or updated Statement(s) of Common Ground as part of the examination process.</p> <p>Reviewer Comments:</p>
<p align="center">F</p>	<p>Are there any aspects of the local plan policies update not in conformity with national policy (or where you will be relying on transitional provisions)? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?</p> <p><i>For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?</i></p>	<p>The Local Plan does not derive the housing requirement by using the standard methodology for housing targets; instead using the London Plan targets (see paragraphs 17.1 to 17.8 in the Plan which provides justification for this approach). Government guidance is clear that the responsibility for the overall distribution of housing need in London lies with the Mayor, and the 35% uplift applied to London will only be applicable once the next London Plan is being developed.</p> <p>The Local Plan protects certain sub-uses within Use Class E, which may be considered contrary to national policy. The Government change to the Use Classes Order in 2020 combined several different town centre uses including shops, cafés and restaurants, offices, gyms and health centres into one use class – Class E (commercial, business and service) uses, and intended for flexibility to be applied. The continued loss of office stock and industrial land from the borough at past rates is unsustainable (paragraph 19.1 in the Plan). This is supported by robust evidence which demonstrates need (e.g. requiring the protection of industrial uses in existing industrial areas) and is justified by paragraphs within the NPPF which require LPAs to meet this need; see paragraphs 82 (economic land) and 86 (town centre uses). As the NPPF still expects a range of needs to be met, restrictions where possible to protect certain sub-uses are considered justified.</p> <p>Biodiversity Net Gain (BNG) – the 2021 Environment Act states that a 10% biodiversity net gain should be sought from proposed development, as a minimum, with no cap set. The Local Plan requires development proposals to go beyond this and provide a measurable 20% net gain for biodiversity. The draft biodiversity net gain Planning Practice Guidance (November 2023) at paragraph 005 recognises Plan-makers may seek a higher percentage than the statutory objective of 10% biodiversity net gain, however this will need to be evidenced and consideration given to how the policy will be implemented. The London Borough of Richmond is unique in its formation. More than two thirds of the borough is protected by either open space or Conservation Area status, whilst the River Thames dissects the borough. There are limited development opportunities, as there were only 3 large developments completed in 2020/21, with most planning applications coming through as infill within existing built-up areas. Given that the</p>

	KEY QUESTIONS	<p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>borough consists of either large areas that are protected space or built-up residential development, the remaining ecological network throughout the borough is reliant on private gardens and smaller spaces including hedgerows and tree lines, which cumulatively create corridors and ‘stepping stones’ – with a close relationship between habitat quality and species survival. In this context, the Council has been seeking net gain in biodiversity in Richmond ever since the Sustainable Construction Checklist was first introduced in 2006 as a means to assessing the environmental impact of development and mitigating any harmful impacts. There continue to be growing pressures on the habitats for protected and other species, from development and population growth bringing intense recreational uses and from climate change, and the multi-functional green and blue networks provide benefits for health and for everyone to engage with nature. In relation to small sites, there is a risk that cumulatively biodiversity will be degraded and lost by excluding householder or self-build developments or through introducing thresholds, particularly in an urban context, and the importance in the borough of the local green infrastructure network. The Biodiversity Background Topic Paper provides further details.</p>				
<p align="center">12.</p>	<p>Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: There are certain areas where a locally distinctive approach has been taken that differs from the strategic London Plan policy where that is considered justified by local evidence.</p> <p>Affordable housing and viability threshold – in response to the Regulation 18 consultation the GLA raised the issue that Policy 11 would not be in conformity with the threshold approach of the London Plan Policy H5. The GLA’s Regulation 19 response on behalf of the Mayor of London sets out that Policy 11 on affordable housing threshold approach is not considered in general conformity. As the threshold approach reduces the total to 35% for sites not in public ownership or industrial land, this would not impact all of the sites within the borough. However, as large-scale developable land is so scarce in the borough, coupled with the acute need for affordable rented homes, every additional affordable home is a major benefit. Large scale sites in the borough can sometimes struggle to even reach 35%, which can be down to a variety of factors impacting on viability such as high existing use values. This alone however shouldn’t justify the need to drop the 50% target on all eligible sites; there is a need to retain flexibility but by introducing the 35% target we would potentially lose out on a large quantum of affordable homes on the sites that could viably provide 50% that would have a detrimental impact on the future supply of affordable housing.</p>				

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>The Council has set out justification for the policy approach. Viability has been tested in the Whole Plan Viability Assessment. An Affordable Housing Background Topic Paper sets out further evidence. See the Duty to Cooperate Statement and Statement of Common Ground with the GLA for further details.</p>				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
		<p>Reviewer Comments:</p>				
13.	<p>Is the local plan policies update:</p> <ul style="list-style-type: none"> in conformity with any ‘higher level’ plans prepared by the Council; and properly reflecting provisions of any made neighbourhood plan? 	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Local Plan has been prepared in accordance with the Council’s other strategies. This is clearly set out within the section ‘Links with Council Vision and other Key Strategies’ (paragraphs 2.39 to 2.45 in the Plan) and reflects the priorities of responding to the climate emergency and delivery of affordable housing.</p>				
		<p>There is one Neighbourhood Plan within the borough, Ham & Petersham, which was adopted in 2019 and forms part of the development plan for the borough. This is referenced in the Place-based Strategy for Ham, Petersham and Richmond Park.</p>				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
		<p>Reviewer Comments:</p>				
14.	<p>Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council’s adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: This is set out within the Council’s Statement of Consultation (June 2023), including a detailed appendix with officer responses to each of the representations made at Regulation 18. An updated version accompanying submission (January 2024) will set out the full details of the Regulation 19 responses including all the representations made. The consultation has been delivered in line with the Council’s Statement of Community Involvement (December 2019).</p>				
		<p>Implications of taking no further action: –</p>				

		Assessment				
KEY QUESTIONS		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p> <p>Reviewer Comments:</p>				
15.	<p>Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Sustainability Appraisal: Richmond Local Plan (Regulation 18) (December 2021) and the Sustainability Appraisal: Richmond Local Plan (Regulation 19) (June 2023) sets out a clear framework for the assessment of the Local Plan and the delivery of sustainable development. It assesses the objectives of the Local Plan, the policies, and the Place-based Strategies and site allocations. Alternative policy options to the spatial strategy are discussed in the Sustainability Appraisal (June 2023) at paragraphs 1.3.17 to 1.3.23. The Regulation 18 Local Plan included a section on 'Alternative Policy Options to the Spatial Strategy' to inform consultees of the issues being considered. Alternative policy options are discussed in the Sustainability Appraisal (June 2023) at paragraphs 3.1.3 to 3.1.6, and within the appraisal tables in section 3. The Site Allocations have been assessed together for each of the Place-based Strategies, it was not felt necessary to assess different options in respect of each site allocation, but alternatives were considered on the new site allocations, as explained in the Sustainability Appraisal (June 2023) at paragraph 4.1.4.</p>				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
		<p>Reviewer Comments:</p>				
16.	<p>Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Sustainability Appraisal assesses both the policies and Place-based Strategies against 14 Sustainability Appraisal Objectives (see Sustainability Appraisal (June 2023) table 1.3). The 14 objectives reflect key environmental, social and economic issues for the borough of Richmond, and had been informed by the first stage updating the Scoping Report (see Sustainability Appraisal (June 2023) section 1.2). As well as assessing policies and site allocations individually, a review of the policy framework across the thematic chapters of the Plan is also presented, with an overview at 3.13.</p>				
		<p>Implications of taking no further action: –</p>				

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
		<p>Reviewer Comments:</p>				
17.	<p>Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Sustainability Appraisal states in the Non-Technical Summary that the “development and appraisal of the Plan is an iterative process, with the policies being refined to take account of appraisal and consultation”. The ‘Mitigation’ column in the Sustainability Appraisal tables sets out where necessary mitigation measures have been identified in order to address adverse impacts and enhance positive effects. The Sustainability Appraisal also assesses the policies and reasonable alternatives (including a ‘status quo’ approach), ensuring that the most sustainable option has been chosen, presenting a clear overview of findings (see Sustainability Appraisal (June 2023) section 4.4). 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.</p>				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
		<p>Reviewer Comments:</p>				
18.	<p>Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: At least 26 Equality Impact Needs Assessments have been produced by the Council since 2020 assessing different places, facilities and services. An Equality Impact and Needs Assessment Publication Local Plan (December 2021) was produced to accompany the Regulation 18 Local Plan. The Equality Impact Needs Assessment (Regulation 19) Local Plan (June 2023) was updated to accompany the Regulation 19 Local Plan, noting that as a result of the Regulation 18 consultation several policies were amended to include additional consideration of the needs of protected groups. The reports explain the methodology the Council used in its equalities assessment and</p>				

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>key issues in the borough. Each policy is considered against equality categories and commentary on impact is provided.</p>				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
		<p>Reviewer Comments:</p>				
19.	<p>Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: A Habitats Regulation Assessment was produced to accompany the Regulation 18 (November 2021) and Regulation 19 (April 2023) version of the Local Plan. This assessed the Local Plan policies, both for their impact alone and in combination with other plans / projects where relevant, taking account of other documents (e.g. the London Plan HRA).</p>				
		<p>LUC prepared a draft report in 2021, which identified that impacts from air pollution, recreation and water could result in a likely significant effect. At the Appropriate Assessment stage, where mitigation and avoidance measures are taken into account, it was concluded that there would be no adverse effects on the integrity of Wimbledon Common Special Area of Conservation (SAC) as a result of recreational pressures. Likewise, it was concluded that there will be no adverse effects on the integrity of the qualifying features of the South West London Waterbodies Special Protection Area/Ramsar in relation to water quantity as a result of the Local Plan.</p> <p>In relation to air pollution, a potential negative effect on the protected Wimbledon Common Special Area of Conservation (SAC) could not be ruled out without an assessment of the in-combination air pollution effects. This assessment has now been undertaken (in 2022/23), using TfL models, which confirmed that the changes in traffic on local roads are significantly less than the 1,000 AADT screening criteria. Therefore, in the updated Habitats Regulation Assessment the air quality impacts have now been screened out, with no further / appropriate assessment required.</p>				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
		<p>Reviewer Comments:</p>				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
20.	<p>If the Habitats Regulations Assessment has identified, through ‘Appropriate Assessment’ that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Habitats Regulation Assessment Regulation 19 (April 2023) identified likely significant effects arising from the plan, either alone or in-combination, and where further assessment at the Appropriate Assessment stage is required for the two scoped-in European sites and impact types. The Appropriate Assessment identified mitigation measures and concluded:</p> <ul style="list-style-type: none"> Recreation – Wimbledon Common Special Area of Conservation: detailed in the HRA 5.9-5.21. Protection and mitigation is clearly outlined in Local Plan Policy 39 and 21.61-21.71 and Policy 37. Water Quantity – South West London Waterbodies Special Protection Area/Ramsar (Knight & Bessborough Reservoirs Site of Special Scientific Interest): detailed in the HRA 5.22-5.31. Local Plan approach to water management is outlined in Policy 3 Part B and Policy 9. <p>The Appropriate Assessment concluded that no adverse effect on integrity will occur for the following European sites subject to the provision of safeguarding and mitigation measures outlined in the HRA:</p> <ul style="list-style-type: none"> no adverse effect on integrity as a result of recreational pressures in relation to the Wimbledon Common Special Area of Conservation (see HRA point 5.38) no adverse effect on integrity as a result of water quantity in relation to the South West London Waterbodies Special Protection Area/Ramsar providing the following safeguards and mitigation measures are implemented (see HRA point 5.39). 				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
		-2	-1	0	+1	+2

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
21.	Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The HRA assessment did not identify any significant adverse effects, and changes to the Local Plan were therefore not required.				
		In relation to water quantity: The HRA (2023) 5.31 concluded that ‘provided that the policy wording incorporated into the plan is implemented successfully, potential future adverse effects on the integrity of the South West London Waterbodies Special Protection Area, as a result of impacts from water quantity on supporting habitat, both alone or in-combination, will be avoided’.				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
Reviewer Comments:						
Housing Strategy						
22.	Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [for instance, because another local authority has agreed to plan for your unmet need], can you explain and robustly justify why?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: See question 3 in relation to the housing target set through the London Plan. The Housing trajectory demonstrates that we have the capacity required, including for an additional 5% buffer, to meet the housing target as set out in the London Plan (2021). Paragraph 4.1.10 of the London Plan sets out that the increase in housing delivery required by the target may be achieved gradually and boroughs are encouraged to set a realistic, stepped housing delivery target over a ten-year period. This is considered relevant to the borough, given the considerable increase expected in small sites delivery whereby there will be a time lag for the change in the policy context towards incremental intensification to result in proposals coming forward, and given some identified large sites are expected to deliver in years five to ten. Further details are set out in the Housing Delivery Background Topic Paper using evidence on previous levels of delivery, including build out and lapse rates, and assessing future delivery, including the stepped trajectory and updated details from the Housing AMR 2022/23.				
		Implications of taking no further action for local plan soundness and/or effectiveness: –				

		Assessment				
	KEY QUESTIONS	<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
G	Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.	A Statement of Common Ground between Elmbridge and Richmond (July 2023) sets out that the Elmbridge Local Plan (submitted to the Planning Inspectorate for examination on 19 July 2023) leaves a local unmet housing need of circ. 2,920 dwellings over its plan period, but notes LBRT are unable to assist in meeting any of Elmbridge’s unmet need given the challenging housing target set by the new London Plan and our own constraints. Further details are in the Statement of Common Ground with Elmbridge Borough Council.				
23.	Does your local plan policies update accommodate any of this unmet need where you can sustainably to do so?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: N/A. The borough of Richmond does not have capacity to accommodate additional housing growth from neighbouring areas.				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
24.	Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period? Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Housing Trajectory demonstrates a 5-Year supply and the expected rate of housing delivery. The latest housing trajectory is set out within the Council’s 2021/22 Housing Authority Monitoring Report . The borough’s strategy for delivery and implementation is clearly articulated and justified in Policy 10 and paragraphs 17.1 to 17.7. Further details are set out in the Housing Delivery Background Topic Paper.				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
		-2	-1	0	+1	+2

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
25.	Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Housing Trajectory demonstrates both (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption and (ii) that beyond this 5-year period sites are developable. Projected completions are forecast to be in excess of a 5% buffer in accordance with NPPG Paragraph: 022 Reference ID: 68-022-20190722. The Housing Delivery Background Topic Paper provides further details.				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
26.	Does the level of supply provide any ‘head room’ (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: ‘Headroom’ is provided to ensure the full requirement will be met during the Local Plan period. The latest housing trajectory is set out within the Council’s 2021/22 Housing Authority Monitoring Report. The Housing Delivery Background Topic Paper provides further details, including a commitment to regular monitoring and review, and exploring taking forward actions relating to housing delivery as necessary and relevant.				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
27.	Is the Council reliant on the delivery of any ‘windfall’ sites (sites not specifically identified in the development plan) during the plan period and if so, how many and when? Is there compelling evidence to confirm that such sites will continue to come forward?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Due to the scarcity of large sites in the borough, the development of small sites is significant. London Plan Policy H2 sets includes a 10 year target of 2,340 dwellings on small sites (below 0.25 hectares in size). The Local Plan at paragraph 17.81 sets out a windfall of 234 homes per annum from years three to five in the five year housing land supply is considered appropriate, which is reflected in the Housing Trajectory (see questions 24-25				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		above). The London Plan supports boroughs in using windfall assumptions in their five-year housing trajectories based on the small sites targets because, in contrast with recent annual trends on small sites, the figures are considered to better reflect a minimum baseline for housing delivery given the new policy focus on developing small sites for housing in the London Plan and the package of measures outlined in the London Housing Strategy. The Housing Delivery Background Topic Paper provides further details.				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: The overall approach is flexible, to reflect local need and site-specific circumstances. Policy 13 Housing Mix and Standards sets out the requirement for the dwelling size / tenure mix that should be created by development proposals, including with respect to market and affordable housing. This has been informed by the Local Housing Needs Assessment (December 2021) and update report (April 2023) . Policy 11 Affordable Housing specifies the tenure and mix for affordable housing, and ensures Registered Providers have clear input into the affordable housing mix proposed on a site.				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
29.	Does the local plan policies update specifically address the needs of different groups in the community?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: Policy 12 Housing Needs of Different Groups protects existing housing which meets identified specific community needs; and supports new housing for identified local need, across a range of tenures. This can include new specialist older persons housing; supported housing; custom, self-build and community-led housing; student accommodation; Build to Rent; purpose-built shared living; and Gypsy and Traveller sites. The policy has been informed by the following:				

	KEY QUESTIONS	<p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<ul style="list-style-type: none"> • Local Housing Needs Assessment (December 2021) (including the Appendix Housing LIN) and update report (April 2023). • The Richmond Housing and Homelessness Strategy 2021-26 • Research on Gypsies and Travellers in the London Borough of Richmond upon Thames (February 2023) was based on updated research in 2022, which demonstrated the need to protect the existing site, however, there is no identified need for additional pitches. • Adult Social Care Market Position Statement (2023) (web based document). 				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
		<p>Reviewer Comments:</p>				
<p align="center">30.</p>	<p>Can your affordable housing requirements, including any geographical variations, be justified?</p> <p>Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The strategic aims of affordable housing for London Boroughs is outlined within The London Plan (2021), with a strategic target for 50% of all new homes to be genuinely affordable. This has been evidenced by a viability assessment.</p> <p>Policy 11 Affordable Housing seeks to maximise the delivery of affordable housing from new development across the borough to meet priority local needs. The affordable housing policy applies to all new housing development, including changes of use for wholly residential and mixed-use sites.</p> <p>There is a significant shortage of affordable housing, and an urgent need to boost supply to meet the needs of a diverse population and create mixed and balanced communities. The borough of Richmond has some of the highest house prices in the United Kingdom. The need for affordable housing in the borough is evidenced by the Council’s Local Housing Needs Assessment (December 2021) and update report (April 2023).</p> <p>The study estimates a net annual need of 1,123 affordable rented and 284 affordable home ownership products. In the context of the Local Plan, genuinely affordable housing is primarily considered to be homes rented at either social rent or London Affordable Rent levels. The Council’s priority is social rented homes, as this is the most affordable product available. Any schemes built through the GLA’s current Affordable Homes Programme are expected to be for social rent. London Affordable Rent will be acceptable if evidence is provided that it will be affordable to the majority of residents living in the borough. The justification for the tenure split is outlined in paragraph 17.24 in the Plan.</p>				

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>The Whole Plan Viability Assessment (2023) tested the affordable housing policy and the report recommended that the 50% target be retained. It is applied on a 'maximum reasonable proportion' basis taking site-specific circumstances into account.</p> <p>The Housing Delivery and Affordable Housing Background Topic Papers set out further evidence and justification.</p>				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
		<p>Reviewer Comments:</p>				
31.	<p>Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence?</p> <p>Does the local plan policies update make adequate provision for the identified needs?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Policy 12 Housing Needs of Different Groups, Part C. addresses the existing Traveller site at Priest Close and Chapter Way and paragraph 17.46 outlines the Council's approach. The Research on Gypsies and Travellers in 2013 and 2015 (report published in 2016) identified that there is no demonstrated need for additional pitches. The Council's research has been updated with new surveys in 2022, and the overall position remains similar, even taking into account some recent unauthorised encampments. This update is now published Research on Gypsies and Travellers (2023).</p> <p>The Council's approach is compliant with London Plan (2021) Policy H14; and paragraph 4.14.2 states that the Mayor will initiate and lead a London-wide gypsy and traveller accommodation needs assessment, with a report due to be published in 2024.</p>				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
		<p>Reviewer Comments:</p>				
32.	<p>Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

	KEY QUESTIONS	Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Reason for score: See response to question31 above.				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
H	List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery	The existing Traveller site at Priest Close and Chapter Way is protected by Policy 12 part C.				
Justified approaches to plan policy and content						
33.	<p>Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text?</p> <p>[You may wish to check each policy setting a threshold]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Various policies include thresholds which trigger certain policy requirements; however, these are considered to be justified by proportionate evidence and appropriately explained within the supporting text. These policies include the following:</p> <ul style="list-style-type: none"> • Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency: <ul style="list-style-type: none"> – All conversions and changes of use that result in the creation of 1 or more dwellings to achieve net-zero carbon with a minimum of 35% on-site reduction beyond Building Regulations (2021) (or any future updating successor to these standards). – New-build residential development of 1 or more dwellings, and major residential development of 10 or more dwellings and non-residential development of 100sqm or more to achieve net-zero carbon with a minimum of 60% on-site reduction. This includes changes of use, conversions and major refurbishments. <p>The Council declared a Climate Change Emergency in 2019 and produced the Climate Emergency Strategy 2019-2024 which sets out the target to be a carbon neutral council by 2030 and a net-zero carbon borough by 2043.</p>				

	<p>KEY QUESTIONS</p>	<p style="text-align: center;">Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<ul style="list-style-type: none"> • Policy 5 Energy Infrastructure: requires major residential development of 10 or more dwellings and non-residential development of 500sqm or more to connect to or extend an existing decentralised energy network (DEN) or provide assessment of an on-site DEN. This is justified in 16.21-16.24 • Policy 6 Sustainable Construction Standards: details the standards for residential development as referred to above (Policy 4), and BREEAM standards are required on non-residential buildings over 500sqm seeking a rating of ‘outstanding’. Also sets fabric efficiency targets by development type. These Local Plan targets will help reduce greenhouse gas emissions and work towards being zero emissions. • Policy 11 Affordable Housing: requires a contribution to affordable housing from all sites, depending on the existing use and capacity of the site, with a financial contribution from small sites and greater provision expected on former employment sites (see Affordable Housing Background Topic Paper for further justification) • Policy 25 Affordable, Flexible and Managed Workspace: requires the provision of affordable workspace within major developments with over 1,000sqm of employment floorspace (gross) proposed. This is justified clearly in 19.39 to 19.50. • Policy 20 Shops and Services Serving Essential Needs: Applications for planning permission that would result in the loss of essential shops and services as defined, will be permitted only where there is genuine alternative provision within walking distance (defined as 400 metres), unless special criteria apply (Part B. 1-3). This is to support and protect essential shops and services which meet the day to day needs of communities, in line with Policy 1 'Living Locally and the 20-minute neighbourhood. • Policy 26 Visitor Accommodation: supports proposals for new visitor accommodation managed appropriately as short-term accommodation, with stays not exceeding 90 days. This enables consideration whether a proposal for visitor accommodation would compromise capacity to meet the need for conventional dwellings. It supports Policy 14 Loss of Housing, which seeks to resist development of short-term holiday rented accommodation in sustainable locations where there is a detrimental impact on the existing housing stock. • Policy 39 Biodiversity and Geodiversity: requires a measurable 20% net gain for biodiversity for small-scale householder applications which increase the footprint and/or floorspace of the existing dwelling, all development proposals including conversion or changes or use that result in 1 dwelling unit or more, and non-residential development proposals which increase the footprint and/or floorspace (see Biodiversity Net Gain Background Topic Paper for further justification). • Policy 47 Sustainable Travel Choices: Part B and Table 23.1 Transport Impact Assessment Thresholds seeks to locate major development in areas that already have a Public Transport Accessibility Level of 4-6. This is

	<p>KEY QUESTIONS</p>	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<p>justified in 23.1-23.5. Sets a threshold approach linked to development size as to whether a separate Transport Statement or Transport Assessment is required for different types of uses, which is justified in 23.16 to 23.19.</p> <ul style="list-style-type: none"> • Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management: <ul style="list-style-type: none"> – Car-free developments may be appropriate where public transport accessibility level (PTAL) is 3 or above. This is justified in 23.1 – 23.14 – Car Clubs: proposed developments of 100 dwellings or above will be expected to provide one off-street car club space per 100 dwellings, and 1 space per 200 dwellings thereafter; secure an accredited car club operator; and fund the cost of membership of the car club scheme to all the first occupants of the site for a minimum of three years. Proposed developments with fewer than 100 dwellings, will be expected to fund the cost membership of a nearby car club scheme to all the first occupants of the site for a minimum of three years. – Car-free development and car-clubs are justified in 23.26 - 23.40 – Vehicular and cycle parking standards, including electric vehicle charging capacity are set in accordance with the thresholds identified within London Plan Policies T5 and T6.1 – T6.5 and Tables 10.2 – 10.6. – 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. These are justified in 23.27 to 23.31 and 23.43 to 23.46. • Policy 50 Education and Training: threshold for Local Employment Agreements secured through an Employment and Skills Plan is justified in 24.20 – 24.44. <p>A number of policies also distinguish requirements based on whether the application is for a minor or major development, including:</p> <ul style="list-style-type: none"> • Policy 1 Living Locally and the 20-minute neighbourhood • Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency • Policy 5 Energy Infrastructure • Policy 6 Sustainable Construction Standards • Policy 7 Waste and the Circular Economy • Policy 8 Flood Risk and Sustainable Drainage • Policy 9 Water Resources and Infrastructure • Policy 17 Supporting our Centres and Promoting Culture • Policy 18 Development in Centres

	KEY QUESTIONS	<p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<ul style="list-style-type: none"> • Policy 21 Protecting the Local Economy • Policy 23 Offices • Policy 24 Industrial Land • Policy 25 Affordable, Flexible and Managed Workspace • Policy 28 Local Character and Design Quality • Policy 37 Public Open Space, Play, Sport and Recreation • Policy 38 Urban Greening • Policy 40 Rivers and River Corridor • Policy 44 Design Process • Policy 47 Sustainable Travel Choices • Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management • Policy 51 Health and Wellbeing • Policy 53 Local Environmental Impacts 				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
		<p>Reviewer Comments:</p>				
34.	<p>Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear <i>why</i> matters will be covered in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Local Plan sets out a strategic framework for the borough, containing both strategic and non-strategic policies. Further guidance to aid policy implementation is set out in existing or future SPDs. Where SPDs already form part of the development plan, it is considered appropriate to refer to these rather than repeat information within the Local Plan. Richmond upon Thames has a series of SPDs, these documents may need to be updated to reflect the new policies, however any guidance which is consistent with the Local Plan will remain applicable.</p> <p>Within the Local Plan reference to the publication of further guidance is made in the following places:</p> <ul style="list-style-type: none"> • 5.3 in relation to Village Planning Guidance SPDs 				

	<p>KEY QUESTIONS</p>	<p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<ul style="list-style-type: none"> • Section 5 Places, within the site allocations. ‘Village Plan Guidance’ is included within the framework for each site • Policy 6 Sustainable Construction Standards and 16.42 reference the Sustainable Construction Checklist Guidance Document (June 2020) • Policy 7 Waste and the Circular Economy and 16.45 reference the Refuse and Recycling: Storage and Access Requirements for New Developments SPD (December 2022) • 16.77 refers to the Sustainable Construction Checklist Guidance Document • Policy 11 Affordable Housing and at paragraphs 17.19 and 17.26 refer to the Affordable Housing SPD (2014). A draft revised Affordable Housing SPD has been consulted on • Policy 13 Housing Mix and Standards and 17.60 refers to the Residential Development Standards SPD (2010) • Paragraphs 17.65 and 17.67 refer to the Village Planning Guidance SPDs, in relation to protecting existing housing and protecting against loss of housing and the conversion of buildings • Paragraphs 17.75 and 17.78 refers to the Design Quality SPD (2006) and Village Planning Guidance SPDs in relation to infill and backland development • Para 17.84 refers to the Design Quality SPD (2006) and Small and Medium Housing Sites SPD (2006) in relation to Policy 16 Small Sites • Para 19.49 refers to the Planning Obligations SPD (2020) in relation to Policy 25 Affordable, Flexible and Managed Workspace • Policy 28 Local Character and Design Quality refers to the Village Planning Guidance and other SPDs relating to character and design. Also at paragraphs 20.1–20.3, 20.5–20.6, 20.21 • Policy 29 Designated Heritage Assets refers to Village Planning Guidance SPD in relation to proposed development in Conservation Areas, also at 20.27, 20.32. Paragraph 20.40 refers to the Buildings of Townscape Merit SPD (2015) • Policies Map Designations in relation to Policy 31 Views and Vistas refers to draft Local Views SPDs. A draft Local Views SPD has been consulted on. New Local Views are proposed to be designated through the Local Plan process. • Policy 37 Public Open Space, Play, Sport and Recreation refers to the Planning Obligations SPD (2020) in relation to Play Space at Part D.5. Also at 21.38 • Paragraph 21.51 refers to potential future Urban Greening or similar SPDs, in relation to Policy 38 Urban Greening • Paragraph 21.78 refers to the future preparation of further planning guidance on biodiversity net gain, in relation to Policy 39 Biodiversity and Geodiversity

	<p>KEY QUESTIONS</p>	<p>Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<ul style="list-style-type: none"> • Paragraph 21.109 refers to the Planning Obligations SPD (2020) in relation to Policy 42 Trees, Woodland and Landscape. Paragraph 21.114 states the Council plans to publish guidance in the form of a SPD on Trees and planting • Policy 44 Design Process Part B Design and Access Statements refer to the Village Planning Guidance SPDs • Policy 46 Amenity and Living Conditions requires applicants to have regard to the guidance set out within the Council’s SPDs relating to design, including Village Planning Guidance, House Extensions and External Alterations, and Small and Medium Housing Sites, as well as other Local Plan policies on infill and backland developments and housing mix and standards. Also multiple SPDs referred to at 22.46 in relation to guidance and illustrations on how to assess sunlight/daylight, overshadowing, visual intrusion, privacy and space between buildings • Paragraph 23.16 refers to the Council’s Transport SPD, in relation to assessing the impact of developments (supporting Policy 47 Sustainable Travel Choices) • Paragraph 23.32 refers to the Transport SPD in relation to Applications for Dropped Kerb and Crossover Accesses to allow Front Garden/Yard Parking (supporting Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management) • Paragraph 24.17 refers to the Planning Obligations SPD (2020) in relation to Impacts on existing social infrastructure (supporting Policy 49 Social and Community Infrastructure) • Paragraphs 24.43-22.44 refer to the Planning Obligations SPD (2020) in relation to Employment and skills training (supporting Policy 50 Education and Training) • Paragraph 25.14 refers to the Planning Obligations SPD (2020) in relation to Health impact Assessment (supporting Policy 51 Health and Wellbeing) • Policy 53 Local Environmental Impacts refers to: <ul style="list-style-type: none"> – specific guidance for air quality in new developments, as set out in the Air Quality SPD (2020) at Part H – Development Control for Noise Generating and Noise Sensitive Development SPD (2018) at Part J – Paragraphs 25.36-25.37 and 25.40 refer to the Air Quality SPD (2020) and Development Control for Noise Generating and Noise Sensitive Development SPD (2018), supporting Policy 53 • Policy 54 Basements and Subterranean Developments Part C refers to the Council's SPDs relating to character and design as well as the relevant Village Planning Guidance and the forthcoming SPD on Basements and Subterranean Developments • Paragraph 26.22 refers to the Council's Planning Obligations SPD, Affordable Housing SPD, the Air Quality SPD, Transport SPD, and any relevant forthcoming SPDs in relation to the Council's Planning Obligations SPD,

		Assessment				
	KEY QUESTIONS	<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>Affordable Housing SPD, the Air Quality SPD, Transport SPD, and any relevant forthcoming SPDs (supporting Policy 55 Delivery and Monitoring)</p> <p>The Government are planning reforms regarding SPDs which may impact the status of SPDS and the process to produce SPDs. The Mayor also produces London wide supplementary guidance to support implementation of the London Plan, which is referred to where relevant in the Local Plan.</p>				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
35.	<p>Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy?</p> <p>[For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Hierarchies are consistent throughout the Local Plan and with both National Policy and other applicable development framework documents, such as the London Plan. Hierarchies are referenced within the following policies:</p> <ul style="list-style-type: none"> • Policy 3 Tackling the Climate Change Emergency and Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency requires development and to be in accordance with the London Plan’s Energy Hierarchy and Cooling Hierarchy • Policy 5 Energy Infrastructure requires development is designed in accordance with the Heating Hierarchy • Policy 17 Supporting our Centres and Promoting Culture and Policy 18 Development in Centres support development which reflects the centre’s role and function within the centre hierarchy shown at 18.1 • Policy 20 Shops and Services Serving Essential Needs references the centre hierarchy • Policy 39 Biodiversity and Geodiversity sets out a mitigation hierarchy (part B) that is required to be followed sequentially for when development would impact on species or a habitat, and requires adherence to the London Plan Policy G6 (Biodiversity and access to nature) mitigation hierarchy for SINCs (part C) • Policy 45 Tall and Mid-Rise Building Zone sets out a spatial hierarchy, which is consistently used within the Local Plan (e.g. in site allocations). This has regard for London Plan Policy D9. 				

	<p>KEY QUESTIONS</p>	<p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>There are also some references in supporting text, relating to national and regional guidance, including: 16.52 refers to the waste hierarchy in relation to a Circular Economy Statement. 16.74 refers to the London Plan drainage hierarchy, 21.35 refers to accessibility standards for open space provision, based on the categorisation of open space forming the green infrastructure network.</p>				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
		<p>Reviewer Comments:</p>				
<p>36.</p>	<p>Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.</p> <p>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</p>	<p align="center">-2</p> <p>No, we do not meet this requirement</p>	<p align="center">-1</p> <p>No, we may not fully meet this requirement</p>	<p align="center">0</p> <p>Unclear whether our plan meets this requirement or not</p>	<p align="center">+1</p> <p>Yes, we are likely to meet this requirement</p>	<p align="center">+2</p> <p>Yes, we are confident our plan will meet this requirement</p>
		<p>Reason for score: Policies that limit certain uses do so on the basis of the Council’s evidence base and/or are consistent with other development plan documents (such as the London Plan) or national policy. In some areas policies protect certain uses, which could be regarded as limiting uses. The justification for limitations on certain uses is clearly set out within the supporting text. Policies that place limitations on uses include:</p> <ul style="list-style-type: none"> • Policy 17 Supporting our Centres and Promoting Culture resists the loss of retail floorspace, seeking to maintain existing commercial uses in centres. Rationale and justification are outlined in 18.8 to 18.14. At 18.15 specify the Council intend to enforce its Article 4 Direction in require development involving the loss of retail floorspace to seek planning permission. • Policy 18 Development in Centres supports development which would not result in an over-concentration of similar uses (such as betting shops, public houses, bars and take-aways) in any one area, where this would result in an adverse cumulative impact. Rationale and justification are outlined in 18.16 – 18.19 and 18.39 - 18.42 • Policy 19 Managing the Impacts of Development on Surrounding and Policy 51 Health and Wellbeing prohibits proposals for fast food takeaways will be refused within 400m of a school. Rationale and justification are outlined in 18.45 				

		Assessment				
KEY QUESTIONS		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<ul style="list-style-type: none"> • Policy 20 Shops and Services Serving Essential Needs resists the loss of essential shops and services. Rationale and justification in 18.46 to 18.52 • Policy 20 Shops and Services Serving Essential Needs resist the loss of public houses, wine bars or drinking establishments. Rationale and justification in 18.53 to 18.55 • Policy 23 Offices Part B. supports major new office development should be directed within the five town centres, and smaller scale office development in suitable locations, particularly within the designated Key Business Areas. Rationale and justification are outlined in 19.15 – 19.19. Paragraph 19.24 specifies the Council intent to enforce its Article 4 Direction to require development involving the loss of office floorspace in specific areas to go through planning permission. • Policy 24 Industrial Land supports major new industrial development proposals in the identified Locally Important Industrial Land and Business Parks. Rationale and justification are outlined in 19.28 – 19.35. Paragraph 19.24 specifies the Council intent to enforce its Article 4 Direction to require development involving the loss of light industrial floorspace in specific areas to go through planning permission. • Policy 26 Visitor Economy – proposals need to be of an appropriate scale for the size of the centre and will be assessed against the transport policies of this Plan 				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
37.	<p>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development? Where relevant, are they consistent with the principles set out in the National Design Code and National Model Design Code?</p> <p>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Where standards are set within the Local Plan, these are considered to be justified, based on the Council’s evidence base, and deliverable. The Local Plan as a whole promotes a character- and design-led approach, as informed by the borough’s Urban Design Study (December 2021 and 2023 update), and which is considered to be consistent in approach with the National Design Guide and the London Plan.</p> <p>Policy 28 Local Character and Design Quality require all development to be of high architectural and urban design quality. Policy 44 Design Process Part A. requires a design-led approach, optimising site capacity and in accordance with London Plan Policy D3.</p>				

	<p>KEY QUESTIONS</p>	<p align="center">Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>Where policies set specific technical standards for proposed development, such as in Policy 22 Promoting Jobs and our Local Economy, these are based on the experience of the borough (e.g. with respect to a well-functioning employment space). Policies are nonetheless flexible enough such that technical standards they can be departed from where adequately justified. Standards are specified at:</p> <ul style="list-style-type: none"> • Policy 6: requires new residential to meet water efficiency standards, 16.40 makes it clear the Council has adopted the 'optional' higher national technical standard for water consumption due to water stress in the region. • Policy 13: requires development to reflect the Nationally Described Space Standard and requires the highest standards of accessible and inclusive design, in accordance with London Plan Policies D5 and 7. Private amenity space in line with London Plan Policy D6. Justification at 17.48 to 17.55, including 17.50 makes it clear the Council has adopted the 'optional' higher space standard and for inclusive access. • New build residential is required to be compliant with fabric efficiency targets outlined in Policy 6 Part B. • Policy 46 - Amenity standards and 22.41 (distance between habitable rooms and separation distances) – set by Richmond. <p>Where relevant, the Whole Plan Viability Assessment (2023) has tested any cost implications (Appendix 1) to ensure deliverability (see response to question 38).</p> <p>Implications of taking no further action: –</p> <p>Mitigation / Action required (if necessary) to move scale to right: –</p> <p>Reviewer Comments:</p>				
<p align="center">Deliverability</p>						
<p align="center">38.</p>	<p>Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?</p>	<p align="center">-2</p>	<p align="center">-1</p>	<p align="center">0</p>	<p align="center">+1</p>	<p align="center">+2</p>
<p>No, we do not meet this requirement</p>		<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>	
		<p>Reason for score: The Local Plan has been subject to a Whole Plan Viability Assessment (April 2023) including residential, non-residential, affordable housing and workspace and CIL in compliance with the requirements of the NPPF. Whole Plan Viability Study (2023) tested the cumulative impact of policy requirements with cost implications on development, using a range of typologies and uses a sensitivity analysis to consider the cyclical markets. Small adjustments to residual land values resulting from changes in policy can be absorbed in most circumstances by</p>				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		developers taking a commercial view on the impact. The study does present a mixed outcome, and therefore considers the need for viability to be assessed on a site-specific basis, taking into account variations particularly between private sales values, scheme composition and benchmark land value.				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
39.	<p>Does the local plan policies update reflect the conclusions and recommendations of your viability evidence?</p> <p>Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Publication (Regulation 19) Local Plan has been developed alongside and informed by the viability assessment of the Pre-Publication (Regulation 18) version. The Whole Plan Viability Assessment (April 2023) identified issues with viability therefore considers the need for viability to be assessed on a site-specific basis, taking into account variations particularly between private sales values, scheme composition and benchmark land value. No recommendations were made in the assessment to alter individual policies. See also details in the Housing Delivery Background Topic Paper.</p>				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
40.	<p>Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: This is set out within the Monitoring Framework (2024). The data required is considered to be reasonably available, with indicators used where appropriate.</p>				
		<p>This also sets out monitoring available through the London Datastore, the regular Authority Monitoring Reports (AMRs), and the Sustainability Appraisal Monitoring Framework.</p>				
		Implications of taking no further action: –				
		Reviewer Comments:				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
41.	<p>Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u>?</p> <p>Where triggers for plan review and/or update are identified are they justified and proportionate?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Policy 55 Delivery and Monitoring Part C. commits to continue throughout the Plan period to assess how planning policies are working and make sure the outcomes improve our local area. The Council's has a well-established and up-to-date monitoring system in place for a range of indicators and targets which monitor the effectiveness of the policies and strategies over time, set out in the Local Plan Monitoring Framework. Key aspects of monitoring continue to be undertaken on an annual basis and is reported as part of the series of Authority's Monitoring Reports. The GLA also publish monitoring information on the Planning London Datahub which includes interactive tools on development proposals to enable up to date assessment of all planning applications.</p> <p>Paragraph 26.26 in the Plan outlines influencing factors on future Local Plan review, referencing national policy and external factors.</p> <p>The Monitoring Framework identifies targets where relevant to individual policies, it does not identify triggers for a Local Plan review.</p>				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
		Plan effectiveness (and associated policy clarity)				
42.	<p>Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

	<p>KEY QUESTIONS</p>	<p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
	<p>15 years from adoption? Does the evidence relied on to support those policies correspond/cover this whole period? Where larger scale developments are proposed as part of the strategy, does the vision look further ahead (at least 30 years)?</p>	<p>Reason for score: Paragraph 2.1 states that the Council’s new Local Plan will set out policies and guidance for the development of the borough over the next 15 years, from the date of its adoption. It is recognised that the final adoption date cannot be confirmed at this stage.</p> <p>The local Plan Strategic Vision describes what the plan will achieve by 2039.</p> <p>Policy 10 New Housing sets a ten year target of 4,110 homes in line with the London Plan. The indicative target beyond this is 3,639 homes for net housing completions, or 306 homes per annum, based on rolling forward in accordance with the London Plan identified capacity for large sites and the small sites figure, until it is replaced by a revised target in a new London Plan. The Housing Delivery Background Topic Paper sets out more details about the housing pipeline over the plan period.</p> <p>The Employment Land and Premises Study (October 2021) considered different approaches to quantifying the employment land need assessment over the 2019-39 Plan period. It references different projections, including GLA (2016) projections to 2036, The London Industrial Land Supply Study (2017) to 2041. The Employment Land and Premises Needs Assessment Update (April 2023) considered the latest data to test whether the 2021 ELPNA recommendations remain robust and reviewed projections to 2041.</p> <p>Likewise, the Stage 1 Housing Needs Assessment was prepared and published in 2021. The Richmond Local Housing Market Assessment Update Report (April 2023) included selective further analysis of housing dynamics and incorporated results from the 2021 Census published by the Office for National Statistics.</p> <p>The Local Plan does not consider further ahead than a 15 year period from adoption.</p> <p>There is a list of strategic policies in 2.13 and ‘strategic policy’ is identified in the policy title, where relevant.</p> <p>Implications of taking no further action: –</p> <p>Mitigation / Action required (if necessary) to move scale to right: –</p> <p>Reviewer Comments:</p>				
<p>43.</p>	<p>Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes?</p>	<p>-2</p> <p>No, we do not meet this requirement</p>	<p>-1</p> <p>No, we may not fully meet this requirement</p>	<p>0</p> <p>Unclear whether our plan meets this requirement or not</p>	<p>+1</p> <p>Yes, we are likely to meet this requirement</p>	<p>+2</p> <p>Yes, we are confident our plan will meet this requirement</p>

KEY QUESTIONS		Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
		<p>Reason for score: Paragraph 2.8 clearly sets out that the Local Plan fully supersedes the existing Local Plan (2018) and the Twickenham Area Action Plan (2013). The West London Waste Plan (2015) and the Ham & Petersham Neighbourhood Plan (2019) will not be superseded by the new Local Plan. The individual policies are not listed because the whole plans are superseded the position is considered clear.</p>				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
<p>44. Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?</p>		Reviewer Comments:				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The strategic vision and objectives of the Local Plan are clearly set out based around the ten themes (see chapter 3). Paragraph 3.3 details how the ten strategic objectives will achieve the strategic vision, which informs the Spatial Strategy and how to manage change in the borough. Nine Place-based Strategies articulate how the vision will be delivered, each with a clear area profile and indication of what future development is expected.</p>				
		<p>The Local Plan has been carefully checked by officers (both reviewing their own policies and those drafted by others) to promote a consistent approach and to ensure that policies can be easily used and understood. Supporting text explains how the Place-based Strategies, Site Allocations (where relevant) and policies should be used.</p>				
		<p>Policy officers work closely with Development Management officers to understand the context for decision-making in the borough. The Council’s Development Management officers have given appropriate weight to the Publication Local Plan in decision-making, with the exception of Policy 39 in relation to biodiversity net gain and Policy 4 in relation to the increase in the carbon offset rate, in accordance with paragraph 48 of the National Planning Policy Framework.</p>				
		<p>Implications of taking no further action: –</p>				
<p>Mitigation / Action required (if necessary) to move scale to right: The LPA is happy to modify language, as informed by the Planning Inspector, to ensure that the Local Plan policies can be easily understood and used in decision making.</p>						
		Reviewer Comments:				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
45.	<p>For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; and (ii) clearly defined on the Policies Map?</p> <p>Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The majority of policy areas designated within the Local Plan are clearly defined in the Local Plan, and their spatial extent is clearly set out on the Local Plan policies map.</p> <p>Spatial areas have been denoted on the policies map where relevant, being laid out clearly and using a Key to assist navigation. All maps and graphics included within the plan are there to provide clarity, and help navigate the document, as well as improve understanding through visual illustration. All maps included within the Plan have a comparable layer on the policies map, which should be used when identifying spatial designations. All the Policies Map designation changes are clearly set out within the Regulation 19 Plan (the orange boxes).</p> <p>The Local Plan includes a number of maps serving different functions, including:</p> <ul style="list-style-type: none"> • Providing an Urban Design context for the overall development strategy (e.g. Map 4.2). • Cartographically representing the Local Plan spatial strategy, including centres, transport, employment, green infrastructure and housing (Key Diagram). • Cartographically representing the nine borough Places Local Plan Area Strategies (Map 5.1) • Cartographically representing Site Allocations (Map 5.2 5) • Illustrating areas for incremental intensification, set out in the London Plan (Map 17.1) • Identification of Tall and Mid-rise building zones (Map 22.1) • Illustration of buffer zones e.g. around centre boundaries (Map 4.1) and buffer zones around existing schools (Map 25.1) <p>It is considered clear from the context of the maps how each is to be used. Where they depict a policy designation or the extent of a Place-based Strategy, the boundary is clearly shown against a base map. It is noted that the resolution of the images within the online pdf of the Regulation 19 Local Plan is not particularly high, due to the large file size of the document; however the LPA website makes it clear (including during the consultations on this document) that higher resolution images could be made available upon request and the web-based version in the Consultation Portal allows for images to be viewed as a pop-up or saved.</p> <p>An online Policies Map of the Regulation 19 Plan was available from June 2023; interactive online mapping allows users to toggle layers on and off and see what applies in a particular location. A pdf of the Policies Map is a submission document.</p>				

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: –				
		Reviewer Comments:				
46.	Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan policies have been carefully reviewed to make it clear the type of development that they will promote. Where development promotes a specific type of use, this is generally referred to within the policy itself (Policy 20 Offices; Policy 24 Industrial Land; Policy 30 Shops and Services Serving Essential Needs). Many terms relating to forms of development are also defined within Section 27 Glossary, such as ‘Commercial uses / Floorspace’ and ‘town centres’.				
		The Local Plan has been specifically reviewed to promote the use of positive wording, and policies are generally phrased to stipulate what is to be protected and the type of development that will be supported. The policies have been prepared with a positive approach to protecting historic and natural assets, tackling the climate emergency and managing change in the borough.				
		Implications of taking no further action: –				
		Mitigation / Action required (if necessary) to move scale to right: The LPA is happy to modify language, as informed by the Planning Inspector, where opportunities exist for policies to be more positively expressed.				
		Reviewer Comments:				
47.	Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed.	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Policies have been drafted to clearly stipulate the types of uses, scale of development and location of these uses where appropriate. This includes for example:				

	KEY QUESTIONS	<p align="center">Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>	
	<p>[Note: If you have said ‘all development’ this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable]</p>	<ul style="list-style-type: none"> • reference to major or minor/small scale development – e.g. at Policy 6 Sustainable Construction Standards; Policy 9 Water Resources and Infrastructure; Policy 16 Small Sites (see also response to question 33 on thresholds) • reference to specific uses – e.g. Policy 26 Visitor Economy; Policy 41 Moorings and Floating Structures; Policy 51 Health & wellbeing prohibits proposals for new fast food takeaways located within 400 metres of the boundaries of a primary or secondary schools • reference to locations – e.g. Policy 23 Offices directs major development to town centres and smaller scale office development to Key Business Areas; Policy 24 Industrial Land directs new industrial development to Locally Important Industrial Land and Business Parks <p>Implications of taking no further action: –</p> <p>Mitigation / Action required (if necessary) to move scale to right: The LPA is happy to modify language, as informed by the Planning Inspector, to clarify the application of policies where this is differentiated based on scale, use, or location, where this is not considered clear.</p> <p>Reviewer Comments:</p>	
	<p>I</p>	<p>State how many policies are in your local plan update?</p> <p>Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.</p>	<p>There are 55 policies in the Local Plan, consisting of 19 Strategic Policies and 36 topic-based policies.</p> <p>i. Policies that repeat parts of other policies within the plan:</p> <ul style="list-style-type: none"> – Policy 1 Living Locally and the 20-minute neighbourhood sets out for example requirement to facilitate access to good public transport, active travel, healthier lifestyles, high quality public realm, open spaces and green infrastructure, however this sets out the overarching concept. – Policy 2 Spatial Strategy: Managing change in the borough promotes provision of green infrastructure that creates resilience and helps mitigate the impacts of climate change, and protect and, where possible, enhance the environment, local character and heritage assets, which are addressed in more detail in topic based policies, although these aims are set out along with the spatial strategy and a sense of the overarching needs to be met. <p>ii. Policies that replicate or repeat paragraphs in the NPPF: No policies replicate paragraphs of the NPPF. Several policies reference requirements of the NPPF – Policies 17, 42, 47 – this is done in a concise manor, in a similar way that it references London Plan policies. Some elements of the policies may be quite close in language to national policy, due to the nature of the subject and requirements e.g. Policy 8 and 35</p> <p>iii. Policies that cross reference other policies:</p>

	<p>KEY QUESTIONS</p>	<p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<ul style="list-style-type: none"> - Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency cross references Policy 7 Waste and the Circular Economy - Policy 5 Energy Infrastructure part D cross references Policy 53 Local Environmental Impacts - Policy 9 Water Resources and Infrastructure part C4 cross references Policy 53 Local Environmental Impacts - Policy 11 Affordable Housing cross references Policy 14 - Policy 12 Housing Needs of Different Groups part B1 and 5 cross references Policy 11 Affordable Housing - Policy 13 Housing Mix and Standards part A cross references Policy 11 Affordable Housing; part C cross references Policy 46 Amenity and Living Conditions - Policy 14 Loss of Housing part C4 cross references Policy 28 Local Character and Design Quality; part C5 cross references Policy 13 Housing Mix and Standards - Policy 15 Infill and Backland Development <ul style="list-style-type: none"> » part A2 cross references Policy 47 Sustainable Travel Choices and Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management » part A5 cross references Policy 16 Small Sites » part B cross references Policy 28 Local Character and Design Quality, Policy 44 Design Process » part B7 cross references Policy 42 Trees Woodland and Landscape » Part B8 cross references Policy 46 Amenity and Living Conditions - Policy 16 Small Sites part D cross references Policy 15 Infill and Backland Development. Part D1 and 7 cross reference Policy 28 'Local Character and Design Quality - Policy 17 Supporting our Centres and Promoting Culture <ul style="list-style-type: none"> » part A2 and A6 cross reference Policy 18 Development in Centres » part A4 cross references Policy 20 Shops and Services Serving Essential Needs » part A5 and 8 cross references Policy 1 Living Locally - Policy 18 Development in Centres <ul style="list-style-type: none"> » part A1 cross references Policy 2 Spatial Strategy: Managing change in the borough » part A9 cross references Policy 19 Managing the Impacts of Development on Surroundings » part B2 cross references Policy 20 Shops and Services Serving Essential Needs » part B3 cross references Policy 28 Local Character and Design Quality » part D1 cross references Policy 28 Local Character and Design Quality and Policy 45 Tall and Mid-Rise Building Zones

	<p>KEY QUESTIONS</p>	<p style="text-align: center;">Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<ul style="list-style-type: none"> – Policy 19 Managing the Impacts of Development on Surroundings cross references Policy 51 Health and Wellbeing re proposals for fast food takeaways will be refused within 400m of a school – Policy 20 Shops and Services Serving Essential Needs Part A cross references Policy 1 Living Locally; part E cross references Policy 49 Social and Community Infrastructure – Policy 21 Protecting the Local Economy cross references Policy 25 Affordable, Flexible and Managed Workspace and Policy 50 Education and Training – Policy 22 Promoting Jobs and our Local Economy Part B cross references Policy 50 Education and Training; Part C5 cross references Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management; Part C7 cross references Policy 27 Telecommunications and Digital Infrastructure – Policy 23 Offices and Policy 24 Industrial Land both cross reference Policy 25 Affordable, Flexible and Managed Workspace – Policy 27 Telecommunications and Digital Infrastructure cross references Policy 28 Local Character and Design Quality – Policy 28 Local Character and Design Quality cross references Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency – Policy 31 Views and Vistas cross references Policy 44 Design Process – Policy 38 Urban Greening cross references Policy 6 Sustainable Construction Standards – Policy 39 Biodiversity and Geodiversity Part A6 cross references Policy 34 Green and Blue Infrastructure – Policy 44 Design Process Part A cross references Policy 28 Local Character and Design Quality; Part E cross references Policy 31 Views and Vistas – Policy 45 Tall and Mid-Rise Building Zones Part A3 cross references Policy 31 Views and Vistas; Part A5 cross references Policy 44 Design Process; Part A6 cross references Policy 32 Royal Botanic Gardens, Kew World Heritage Site; Part C cross references Policy 44 Design Process and Policy 28 Local Character and Design Quality – Policy 46 Amenity and Living Conditions cross references Policy 13 Housing Mix and Standards and Policy 53 Local Environmental Impacts – Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management Parts K and N cross reference Policy 47 Sustainable Travel Choices – Policy 49 Social and Community Infrastructure Part B4 cross references Policy 1 Living Locally and the 20-minute neighbourhood; Part E cross references Policy 11 Affordable Housing; Part F cross references Policy 51 Health and Wellbeing

	<p>KEY QUESTIONS</p>	<p style="text-align: center;">Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
		<ul style="list-style-type: none"> - Policy 51 Health and Wellbeing: <ul style="list-style-type: none"> » Part A1 and 3 cross reference Policy 1 Living Locally and the 20-minute neighbourhood » Part A2 cross references Policy 37 Public Open Space, Play, Sport and Recreation » Part A4 cross references Policy 52 Allotments and Food Growing Spaces » Part A9 cross references Policy 13 Housing Mix and Standards and Policy 28 Local Character and Design Quality » Part B5 cross references Policy 49 Social and Community Infrastructure - Policy 54 Basements and Subterranean Developments Part B5 and B6 cross reference Policy 8 Flood Risk and Sustainable Drainage; Part B7 cross references Policy 53 Local Environmental Impacts - Policy 55 Delivery and Monitoring cross references Policy 11 Affordable Housing <p>The Local Plan has been checked to remove, as much as possible, repetition of wording between multiple policies. There is significant cross reference within the Local Plan to other policies; however, this is deliberate as it is considered to help to signpost prospective applicants to key related policies (notwithstanding the expectation that the Local Plan should be read in whole) and is also used to clarify the application of expectations without the need to repeat criteria. The LPA is happy to remove any cross-referencing that is considered unhelpful or unnecessary.</p> <p>The Local Plan must be in ‘general conformity’ with the London Plan, and the two plans are therefore closely related. A large number of the policies in the Local Plan refer to the London Plan; however, in the majority of instances this is to reference criteria or standards required by the London Plan which are not themselves repeated in the Local Plan. It is considered helpful to clarify that the Local Plan conforms (and expected compliance) with the London Plan requirements with respect to strategic policies such as affordable housing (Policy 11). References to London Plan policies are also intended to signpost to relevant information – again intended to assist – however these could be removed if considered appropriate.</p> <p>The following policies reference policies from the London Plan: Policies 3 to 5, 7, 12 to 16, 20, 22 to 28, 33, 37, 39, 42, 44 to 48, 50, 51 and 53.</p> <p>Policy 7 Waste and the Circular Economy refers to the West London Waste Plan, which is part of Richmond’s Development Plan.</p> <p>Policy 8 Flood Risk and Sustainable Drainage refers to the Thames Estuary 2100 Plan.</p>

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
48.	<p>Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?</p> <p>If you find duplication or repetition you may want to take minute to consider whether this is appropriate.</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: There is significant cross-reference in the Local Plan both to other policies within that document, as well as to policies within the London Plan; however generally these do not repeat wording or criteria and are considered either necessary to clarify the application of the policy or helpful for purposes of signposting.</p>				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: The LPA is happy to remove any cross-referencing that is considered to be unnecessary or repetitious.</p>				
<p>Reviewer Comments:</p>						
49.	<p>Do policies avoid duplicating other regulatory requirements (for example, building regulations)?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Reference is made to the Building Regulations in two policies:</p> <ul style="list-style-type: none"> – Policy 4 Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency – Policy 13 Housing Mix and Standards <p>Reference is made to Building Regulations in the supporting text to the policies 4 and 13 above, and</p> <ul style="list-style-type: none"> – At 20.36 in relation to Historic buildings – At 22.32 in relation to requirement for 2 stairways in buildings over 30m in height – At 25.57 in relation to basement and subterranean development <p>This approach is considered to provide helpful signposting and does not duplicate regulatory requirements.</p>				
		<p>Implications of taking no further action: –</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: –</p>				
<p>Reviewer Comments:</p>						

KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		-2	-1	0	+1	+2
50.	<p>Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker?</p> <p>[For instance, policies should avoid using overly subjective terms such as “to the Council’s satisfaction”, “considered necessary by the Council” or “appropriate” without associated clarification.]</p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Throughout the Local Plan, references are made to the ‘appropriate height’ or ‘appropriate height range’ of buildings, however what this refers to is sufficiently clarified through Appendix 3 Tall Building and Mid-rise Building Maps, which is referred to in Policy 45 Tall and Mid-Rise Building Zones.</p> <p>Policies 5, 7, 26, 29, 32, 36, 40, 42, 47 and 51 refer to ‘where appropriate’. However, generally the use of this phrase is contextualised such that the meaning should be clear to the user. It is noted that a number of the Place-based Strategies make reference to ‘where appropriate’ with respect to ‘conserve the character, elements and features whilst enhancing existing features’.</p> <p>The phrase ‘to the Council’s satisfaction’ is used at 16.30 in relation to BREEAM assessments. Site Allocation 2 refers to the requirement for ‘any scheme would need to ensure safe access to and egress from the island to the Environment Agency’s satisfaction’.</p> <p>‘Where applicable and considered necessary, the Council may seek a bespoke charge specific to the proposal to cover the cost of monitoring the Construction Management Plan (CMP)’ is used in Policy 53 Local Environmental Impacts.</p> <p>Generally subjective terms have been avoided throughout the Plan, and where relevant comments were raised during the preparation of the Plan additional clarification has been added.</p>				
		<p>Implications of taking no further action: The wording or requirements may not be clear.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: The LPA is happy to remove any references to ambiguous wording from the Local Plan, if considered appropriate by the Planning Inspector.</p>				
		<p>Reviewer Comments:</p>				

Date of assessment:	January 2024 (Final)
Assessed by:	Richmond upon Thames Planning Policy Team
Checked by:	Joanne Capper, Principal Policy and Information Planner Adam Hutchings, Spatial Planning and Design Team Manager
Overall Score:	69/100
Comments:	