



Richmond Council
Civic Centre, 44 York Street
Twickenham
TW1 3BZ

Planning Policy Consultation Team
Planning Directorate – Planning Policy
Division
Ministry of Housing, Communities and Local
Government
Floor 3, Fry Building
2 Marsham Street
London
SW1P 4DF

Date: 24 September 2024

Sent via email

Dear Rt Hon Angela Rayner MP, Secretary of State for Housing, Communities and Local Government,

RE: 2024 NPPF Consultation

The London Borough of Richmond upon Thames (hereafter referred to as 'The Council') are pleased to present you with our response to the 2024 NPPF consultation which seeks views on the Government's approach to revising the National Planning Policy Framework.

Housing

The Council supports the intention to address the housing crisis by increasing the delivery of new housing across the country, and we are in support of the reinstatement of the previous wording to Paragraph 61 and the removal of the urban uplift which we found to be a flawed and arbitrary component of the housing need methodology. Whilst we support the principle of reforming the NPPF to drive up the delivery of new housing, particularly for genuinely affordable tenures, we consider it important to ensure that the amount of development to be delivered in any area strikes the right balance between ambition and reality. In this context, we would support the ongoing role of the London Plan taking a capacity-based approach to establishing realistic borough-level housing targets. We recognise that the largest urban areas, including London, have an important role to play in meeting the

country's housing needs, however we would emphasise that our borough is significantly constrained. Two thirds of our borough is protected by open land designations, swathes of protected parks and a high quantum of conservation and open space designations including Metropolitan Open Land and Green Belt. In light of the unique constraints faced by the Council, we urge the Government to ensure appropriate mechanisms are in place to ensure housing targets are ambitious, but most importantly realistic and achievable, without resulting in the overall planning balance being negatively impacted. As evidence of this challenge, the Council would point to the significant divide between both the existing and proposed local housing need figures for the Borough (2,187 and 2,283 homes per annum respectively) and the evidence-derived, capacity target required from the London Plan and reflected in the Local Plan (411 homes per annum).

We would like to express our particular concerns with the proposal to remove housing supply protections for recently adopted Local Plans and the proposed reintroduction of the 5% buffer to 5-year housing land supply calculations. The Council is concerned that the proposed changes could lead to situations where recently adopted Local Plans are almost immediately considered "out of date", which would act as a disincentive to preparing Local Plans and could lead to a rise in speculative development, which is commonly inferior, lower quality, and delivers against fewer national and local policy objectives. There is also a degree to which this has potential to complicate housing supply calculations for authorities such as Richmond upon Thames with limited development opportunities such as statutory constraints which are beyond the Council's control.

The Council strongly supports proposed changes to the NPPF which emphasise the importance of social rented housing. However, there are few proposed changes that would result in direct increases to the number of social rented homes delivered, such as the importance of all forms of additional housing contributing to the delivery of additional social rented housing. We urge government to consider the use of more explicit wording in policy amendments to contribute to the delivery of social rented homes specifically.

Plan-Led System

The Council are encouraged by the proposals to amend wording on the presumption in favour of sustainable development which will protect local planning authorities against the abuse of the presumption by developers looking to bring forward low-quality and potentially unsustainable development, particularly the emphasis placed on ensuring development must deliver appropriate affordable housing. We would encourage the Government to consider ways in which the importance of all housing developments maximising the delivery of affordable housing can be enshrined in policy wording.

Climate Change and Retrofit

The Council recognise the climate crisis and have committed to becoming carbon neutral as an organisation by 2030 and as a Borough by 2043. We would encourage the Government to make changes across the NPPF to embed climate change objectives at the heart of the planning system. As part of this, the Council supports measures to give greater support in principle to renewable and low carbon energy, provided that local authorities remain empowered to give appropriate weight to all considerations that contribute to sustainable development.

The Council would encourage the Government to prioritise a retrofit first approach in national planning policy to require developers to reuse and upgrade the existing fabric of buildings rather than demolish. We also urge Government to encourage the uptake of domestic retrofit by the public and prioritise the removal of the financial or technical barriers to doing so. The Council feels strongly that the planning system should support retrofit for climate resilience and not underestimate the importance or impact of domestic retrofitting in the journey to net zero.

Green Belt

The Council has no objection to the definition of circumstances where development in Green Belt is not inappropriate, as already established policy sets out. However, we would like to emphasise that land designated as Green Belt is protected for a reason – Green Belt land in Richmond upon Thames is considered extremely precious and forms an important part of our Borough's network of green and blue infrastructure. The Council has recently undertaken an Open Land Review as part of its emerging Local Plan, which concluded all Green Belt land in the borough contributed strongly to the purposes of maintaining Green Belts.

We recommend that any changes to Paragraph 154g must be accompanied by guidance which clearly sets out that robust evidence will be required to demonstrate why the land in question is considered to make limited/no contribution to the five purposes of Green Belt land as set out in the NPPF. It must be made clear in both policy and guidance that a strong case will need to be made as to how the de-designation of any Green Belt land will not undermine the integrity of the wider Green Belt and will not undermine the function of the Borough's Green Belt as a whole. The Council would also like policy to set out that evidence will be required as to how the release of any Green Belt would result in the delivery of homes most needed, which at a local level are new social rented units. Furthermore, The Council request that Government consider a more strategic approach to Green Belt land that requires an increase in partnership working between authorities with the end goal of protecting the integrity of the Green Belt – a strategic cross-authority approach will prevent piecemeal approaches to development in the Green Belt, and will contribute

to greater consistency in planning decisions across authorities sharing boundaries with Green Belt designations.

The Council would like to see further clarity in the definition of 'Grey Belt' and would welcome further advice on a methodology for identifying Grey Belt via Open Land Reviews as part of local plan-making, which we consider would be the most sensible and proactive approach to assessing Grey Belt. The Council has concerns over the ability for Grey Belt land to receive permission through the development management process, particularly given the risk that this could encourage speculative proposals that take a narrow or subjective view that may lead to the incremental erosion of Green Belt. The Council feels strongly that such provisions should only apply where there is a demonstrable need for such development that has not been delivered through the plan-making process, where the impact of a proposal on the contribution of adjoining land is considered, and where the proposed Golden Rules, and all other policy objectives, are clearly secured.

We are also of the opinion that allowing for development on Grey Belt through planning applications will invite more speculative applications from developers, which will result in the redirection of finite Council resource without necessarily resulting in the increased delivery of quality homes. The Council would encourage Government to consider the robustness of proposed definitions and provisions if they choose to pursue the designation of Grey Belt, and ensure any policy is supported by strict criteria which will protect planning authority resource from counter-productive activity. In London, the London Plan affords land designated as Metropolitan Open Land (MOL) the same status as Green Belt, and it should be recognised that the designation criteria for MOL are somewhat different to those for Green Belt. The Council would welcome clarity from the Government and the GLA on the implications of 'Grey Belt' designation in London, specifically reassurance that sites falling into MOL will not be considered 'Grey Belt' and would be exempt from provisions set out in this consultation.

Local Authority Resourcing

The Council strongly welcomes the proposals to create additional resource for local authority planning teams, particularly through an increase in householder application fees. The Council would support a more comprehensive reform of the fee system aimed at setting fees at a genuine cost-recovery level. The Council participated in a pilot scheme some years ago and would welcome an opportunity to share learning in this area.

More broadly, the Council would welcome continued and expanded investment from Government into the planning system, including investment in recruiting and retaining planners. Local authority planning teams have known issues with attracting and retaining planners, particularly those with specialisms which are in increasingly

high demand. National investment and interventions in planning services will be fundamental to delivering the Government's proposed reforms and wider ambitions for the planning system.

The Council is grateful for the opportunity to contribute to this consultation and looks forward to hearing more around the further programme of planning reform, including provisions likely to be set out in the forthcoming Planning and Infrastructure Bill.

Yours Sincerely,

Cllr Julia Neden-Watts
Deputy Leader and Chair of the Environment, Sustainability, Culture and Sports
Committee

cc

Munira Wilson MP: munira.wilson.mp@parliament.uk

Sarah Olney MP: sarah.olney.mp@parliament.uk