

London Borough of Richmond upon Thames - Towards a New London Plan Consultation Response

Heading		Response
Introduction		
1.1 What is the London Plan?	No comments required.	
1.2 What years will the new London Plan cover?	<p>The Council supports the principle that the new London Plan should set a long-term strategy that plans positively for the major infrastructure needed to achieve the Mayor’s growth ambitions. The Council has no specific observations to make over the proposed plan period but acknowledges that the London Plan will need to be reviewed at least every five years, in any case.</p> <p>The Council notes that the document suggests that housing targets will be set for a ten-year period from 2026/27 but acknowledges that many of the measures needed to increase housing supply commensurate with the Mayor’s ambitions will take longer than 10 years to put in place. The Council supports the general principle of the Mayor utilising the new London Plan to establish new housing targets (notwithstanding more detailed observations made elsewhere). The Council would observe that housing targets being set for a ten-year period from the year the London Plan is published has a direct, practical bearing on the preparation of Local Plans which follow the new London Plan, in that, in practice, many Local Plans will reach the point of adoption with fewer than 10 years of their target left. This is an observable challenge at present, with only around 4 years of the 2021 London Plan’s housing target period remaining and any indication of new housing targets through the new London Plan still at least 12 months away. The Council would therefore suggest that the new London Plan should provide clear direction as to how Local Plans should consider or address housing targets beyond the expiry of any ten-year period (as the 2021 London Plan does) or that the Mayor should consider whether, in liaison with individual Boroughs, it is appropriate or helpful to set housing targets for a period longer than ten years.</p>	
1.3 How many homes will it plan for?	<p>The Council notes and supports the commitments with national policy to significantly increase the supply of new housing nationally in light of the national housing crisis and an acute shortage of affordable housing. In this respect, the Council’s Local Plan forms a positive strategy to delivering new homes across a range of development sites across the Borough, including site allocations, infill and small sites, and by strongly resisting development proposals which would result in a loss of homes. The Council therefore supports the principle of the new London Plan taking a positive and proactive approach to delivering new housing.</p> <p>In looking to deliver new housing, the Council wishes to emphasise, as it has elsewhere in this response, that the new London Plan must strike the right balance between local needs, opportunities and constraints, and focus on the types of growth most critically needed, including genuinely affordable housing. Specifically, the new London Plan should look to find ways to unlock new development and make development more sustainable, but should not seek to drive growth through an erosion of standards, or by unbalancing communities by foregoing critical infrastructure or harming the balance of wider land uses, including land for community uses, jobs, recreation and biodiversity. In Richmond Borough, whilst the Council’s Local Plan is a positive strategy for delivering new housing, the Borough’s limited land supply and many important environmental designations makes it even more vital that the drive to significantly increase housing delivery does not come at the expense of the infrastructure required to support new housing, including schools, education, health facilities etc. and the overall need to achieve a balance between housing and economic growth/jobs, to deliver the good and sustainable growth envisaged.</p> <p>The Council also supports the recognition within the consultation document that the principle of using Borough-level housing targets based on an understanding of where homes can be built, rather than necessarily where the need for those homes arises, allows London to better plan where new development happens.</p>	

	<p>The Council notes that changes to national planning policy made in December 2024 included a change to the standard method for calculating local housing need. As recognised in the consultation document, this results in a pan-London housing need figure of c.88,000 homes per year (compared to the previous London Plan housing requirement at c.52,000 homes per year and average delivery rates of c.35,000 homes per year). Overall, the Council supports the principle of the new London Plan setting out to meet as much of London’s housing need as possible, provided that the London Plan’s strategy maximises the supply of genuinely affordable housing, secures the delivery of a balance of other necessary land uses and infrastructure, supports good growth principles and does not compromise the fundamental objectives of the London Plan and Borough Local Plans. However, the Council would emphasise that it is vital that the new London Plan balances the objective of meeting London’s housing need with these wider fundamental objectives, including in how it looks to evidence and establish new Borough-level housing targets. Richmond is a particularly constrained Borough, with more than two thirds of the borough being protected by either open space or conservation area status. There are open spaces including historic landscapes such as Richmond and Bushy Parks and the Old Deer Park, the River Thames and the River Crane corridors, and other tributaries. It is therefore critical that these housing targets are informed by a comprehensive and robust evidence base which objectively considers the capacity of London and individual Boroughs to deliver housing. In this respect, the process through which housing targets are established should not simply be an exercise in apportioning the 88,000 figure but rather a process guided by a genuine understanding of local capacity, opportunity and constraints, informed by meaningful collaboration with Boroughs, industry and communities. At this early stage of the new London Plan process, there is limited evidence available as to how capacity, opportunity and constraints will be explored and examined, albeit the Council notes that the GLA are leading on the preparation of a new London-wide Green Belt Review. The Council welcomes the opportunity to work with the Mayor as this evidence base develops.</p> <p>It is noted that the Mayor is planning for an overall growth in London’s population - to rise by a further million over the plan period. It is considered there needs to be further evidence to understand the changes at a local level. Some parts of London have seen growth below previous forecasts, and lower population projections for future growth. For Richmond, the GLA projections (2022-based) estimated a 0.3% change by 2039; albeit it is acknowledged that challenges remain about how the population will change and how this impacts on household growth.</p>
1.4 Viability and Delivery	<p>The Council notes that there are a range of challenges currently affecting housing delivery in London but supports the Mayor’s suggestion that these market conditions are improving, and that London has a proven track record of being a very adaptable and resilient city.</p> <p>The Council acknowledges that the content of the new London Plan, as with Local Plans, will need to strike an appropriate balance between ambition and deliverability. Nevertheless, the Council would encourage the Mayor to avoid diluting or otherwise removing ambition from policies to accommodate short-term market conditions when the new London Plan itself is intended to be a long-term policy document.</p> <p>The Council is particularly interested to understand how the following statement could work in practice “<i>Some policy requirements may be phased so they start to apply at a later date or, for example, when economic conditions or technologies improve</i>”. The Council considers it would be preferable to have an approach in place within the new London Plan whereby the policy thresholds or requirements could be flexed as economic conditions improve, such as an affordable housing threshold that could be phased over time, or reassessed at intervals as economic conditions improve, as opposed to reducing the overall ambition or requirements within policies. Our key concern is that if a pessimistic approach to policies, including affordable housing policies, is taken as part of the emerging London Plan to accommodate short-term market conditions, this approach may then remain in place for the entirety of the London Plan period as economic conditions improve, missing out on potential opportunities for delivering higher levels of affordable housing in the future.</p> <p>The Council does welcome the consideration of balance within the London Plan and taking into account quality of homes, climate commitments, health, wellbeing and inclusion which are all key considerations, a balanced approach within the London Plan will then enable LPAs to focus on their priorities to their communities which can then be defined more specifically within their Local Plans.</p>
1.5 What is this document about?	<p>The Council supports the general principle of the Mayor reviewing London Plan policies to consider whether it is possible to target policies better or streamline how they are applied to reduce costs and speed up the planning process. However, the Council considers it important that this exercise is</p>

	<p>targeted and does not result in policy requirements being weakened or removed where this would undermine the wider objectives of the London Plan, Local Plans or national planning system.</p> <p>It is also important that the relationship between the new London Plan and proposed National Development Management Policies is appropriately explored and reconciled. Whilst the Council considers it important that the Mayor and individual Boroughs remain empowered to develop local policy frameworks which reflect the specific characteristics, needs and ambitions of local areas, policies within the new London Plan should generally seek to avoid duplication or conflict with National Development Management Policies to assist the preparation of Local Plans and the implementation of policy frameworks as a whole. When available, the Council would value further information and opportunities to shape the new London Plan on this issue.</p>
1.6 Legal and Procedural Requirements	<i>No response required.</i>
1.7 Integrated Impact Assessment	The Council supports the preparation of the new London Plan being informed by a comprehensive Integrated Impact Assessment which incorporates Sustainability Appraisal, Equalities Impact Assessment and Health Impact Assessment. The Council notes that an IIA scoping report is proposed for publication later this year. When available, the Council would value further information and opportunities to shape the new London Plan on this issue.
1.8 Habitat Regulations Assessment	The Council supports the preparation of the new London Plan being informed by a robust Habitat Regulations Assessment (HRA) and would value further information and opportunities to shape the new London Plan on this issue.
1.9 Beyond London	<p>The Council supports the principle of the London Plan taking a positive and proactive approach to addressing strategic cross-boundary issues which permeate beyond the administrative boundary of London.</p> <p>The Council notes and broadly supports the principle of rolling out strategic planning frameworks across wider areas as a mechanism for positively addressing cross-boundary (Duty to Co-operate) issues in a way that the current planning system often struggles to achieve. At this current time, however, it is recognised that Local Government Re-Organisation is planned for many of the two-tier areas surrounding London, and there is likely to be an extended period of flux before which these areas can meaningfully begin preparing strategic planning frameworks. Regardless of this period of change, the Council encourages the Mayor to ensure that the preparation of the new London Plan is informed by meaningful and constructive collaboration with both London Boroughs and adjacent Boroughs and that strategic and cross-boundary issues are addressed by the new London Plan and not deferred.</p> <p>Specifically, the London Plan will need to positively engage the wider South East on issues such as spatial strategy and land use, infrastructure and environmental opportunities. This should critically include ensuring that growth strategies complement rather than compete with one another, and that the strategic infrastructure that growth in London and the wider South East requires is properly planned for, co-ordinated and delivered. This would include, as an example, continuing to promote a long-term ambition for Crossrail 2. Co-operation beyond London should also involve developing a sound long-term land use strategy which balances the need to protect London's strategic economic land with identifying the optimum location for new economic infrastructure, including for example ensuring land-intensive economic uses which require access to the strategic road network are guided to the most appropriate locations, which in practice may be in areas adjacent to London.</p> <p>The Council notes that some of the Green Belt within the borough is contiguous with that in neighbouring Surrey authorities. It will be important to work closely with Spelthorne and Elmbridge Borough Councils as part of the review of London's Green Belt.</p>

1.10 Good Growth Objectives	<p>The Council broadly supports the Good Growth objectives contained in the current London Plan. The Council notes that the Mayor has highlighted that the new London Plan will include the “critical priorities” of delivering the homes Londoners need and growing a good economy. The Council supports these priorities but would emphasise that they need to be set within a framework which includes the wider Good Growth objectives to ensure development is socially, economically and environmentally sustainable. The London Plan, and Borough Local Plans, should be empowered to ensure that the growth that comes forward is of the right type and right location to meet local needs (including for genuinely affordable housing), supports the wider vitality and health of local communities, and helps to tackle the climate crisis. The Council would encourage the Mayor to avoid any suggestion within the new London Plan that the need to deliver homes and grow the economy will be prioritised over and above the wider Good Growth objectives. To do so risks the erosion of standards and the undermining of the plan-led system. Instead, the new London Plan should ensure that the prioritisation of delivering homes and growing the economy are set within the context of a sound and sustainable strategy that addresses the wider objectives of the London Plan and individual Borough Local Plans.</p>
1.11 The Key Diagram	<p>The Council notes Figure 1.2 which indicates the progress made in achieving elements of the London Plan’s Key Diagram.</p> <p>The Council supports the recognition made within the text that extensions and upgrades to the public transport network will be critical to delivering sustainable growth. In this respect, the Council supports the continued recognition of Crossrail 2 within the Key Diagram, and elsewhere in the consultation document, but notes it is not featured in the list of key initial priorities within this section. The Council considers that the London Plan should align with the recently published London Growth Plan which prioritises the delivery of Crossrail 2 to unlock new homes and growth. The Council would value further co-operation to examine the strategic transport infrastructure needed to support growth as the new London Plan’s spatial vision develops. In this context, the Council also wishes to highlight its intention develop its own local growth plan which will set an approach to shaping growth in its area and provides an opportunity to do this at the local level. Consistency and co-ordination between the London Plan, London Growth Plan and local growth plans will be important to ensuring strategy and policy on achieving growth is aligned.</p>
<p style="text-align: center;">Increasing London’s Housing Supply</p>	
2.1 A Brownfield First Approach	<p>The Council strongly supports the principle of prioritising opportunities to plan for and deliver homes within London’s existing urban extent, including to maximise the proportion of housing delivered on brownfield land. Land designated as Green Belt is precious and as a starting point should only be considered for development when other options are exhausted. The Council supports the recognition within this section that the new London Plan will need to ensure the quality of places and be clear about what is needed to support higher densities, however, whilst the Council recognises that increasing densities will need to be explored as part of the development of the new London Plan, it would emphasise that London’s neighbourhoods are unique and distinct, and the optimum density for a specific neighbourhood will be sensitive to its local characteristics, including, but not limited to, its prevailing character, public transport accessibility, historic character and heritage and sensitivity to change. The new London Plan’s approach to optimising densities should be informed by evidence, including Urban Design Studies, with the detail deferred to individual Boroughs to direct.</p> <p>In the context of wider policy changes suggested within the consultation document, including the Mayor’s on-going London-wide review of Green Belt, the Council would emphasise that it is important that London’s overall capacity to support greater growth is supported by a commensurate growth in the capacity and capability of the development industry, including both public and private sector. This is vital to ensure that developers retain the right economic incentives to develop urban and brownfield sites to avoid developers simply disinvesting from trickier or costlier urban or brownfield sites in favour of developing more straightforward or less costly suburban or greenfield sites.</p> <p>The Council notes that the consultation document raises the significant time it can take for decisions to be made and how this can affect the time it takes to get homes built. On the basis that decisions are often delegated to case officers which allows quicker decision making, which is emphasised by the new NPPF, speeding up the planning process could be aided by the types of schemes referred to the GLA being reassessed as part of the new London Plan. For example, the threshold for GLA referral could be updated to only incorporate much larger and more sensitive schemes (such as</p>

	<p>schemes over 500 dwellings or similar) which would aid in speeding up the process. As an example of where this process can be problematic, some referable schemes such as Homebase in Richmond took more than 8 years to go from submission of the original planning application to a permission. Updating the threshold for referable applications would allow the GLA to focus on seeking benefits on only the largest strategic and most complex schemes across London and allowing quicker decisions on other smaller schemes.</p>
2.2 London's Call for Sites – LAND4LDN	<p>The Council notes that the Mayor issued a Call for Sites (LAND4LDN) in Autumn 2024 and that Council officers have been participating in this process. The Council would emphasise the importance of ensuring that individual Boroughs have discretion over the process and outcomes associated with the Call for Sites, including any assumptions made over the suitability or capacity of sites in the context of any subsequent SHLAA process. These processes should be led with the objective of ensuring the information captured on land availability in London is as up-to-date and accurate as possible, within an assessment framework that appropriately balances policy ambitions at a local level (including to ensure the 'policy levers' referenced in the consultation document are those supported by individual Boroughs having regard to the Council's full response to this consultation). In this respect, the process must be designed to ensure that the up-to-date and localised knowledge on individual site opportunities, constraints and histories held by Borough officers is favoured over any generalised or unevidenced assumptions.</p>
2.3 Opportunity Areas	<p>No Opportunity Areas are located within Richmond borough and the Council recognises that it remains the case that the Borough is unlikely to have the types of strategic development opportunity appropriate for Opportunity Area status in the new London Plan.</p> <p>The Council notes a number of Opportunity Areas close to the borough identified as 'review/remove OA designation', including Clapham Junction, Kingston, and Wimbledon/Colliers Wood/South Wimbledon, with a number that were linked to transport infrastructure improvements which could impact on residents, workers and visitors travelling to and from the borough. In particular, all trains serving the borough travel through Clapham Junction, with the exception of London Underground and London Overground services at Richmond and Kew Gardens. Service levels have still not returned to pre-pandemic levels and it is believed that continued investment in Clapham Junction Station will be vital to improve interchange and improve passengers' public transport experience, to encourage modal shift. The removal of Opportunity Area status sends the wrong signal and may undermine attempts to seek infrastructure improvements.</p> <p>The Council suggests the proposed treatment of Crossrail 2 within the new London Plan requires clearer articulation. It is noted that the consultation document continues to promote Crossrail 2 albeit at a delivery timescale beyond 2040, but that any Opportunity Areas along the Crossrail 2 corridor have been proposed for deletion, despite the new London Plan having a proposed plan period to 2050. Richmond would be a major beneficiary of Crossrail 2 and would like to see clearer support for the line as per London's Growth Plan, as well as updated timescales included within the new London Plan.</p>
2.4 Central Activities Zone	<p>The Council notes the role of the Central Activities Zone (CAZ) designation to supporting central London's multifunctional importance for economic growth, including tourism.</p> <p>The Council supports the Mayor's commitment to ensuring valued strategic views continue to play an important role in protecting London's heritage. The Council notes that the Mayor will be reviewing the guidance set out in the London View Management Framework (LVMF) with a view to consider how the policy works in practice to ensure its impact is proportionate. Whilst the Council does not oppose reviewing guidance to ensure it remains up-to-date and fit for purpose, the Council would not support reviews of the LVMF which sought to diminish the ongoing role of protected views in favour of identifying greater capacity for growth.</p> <p>The general principle of amending the role of the CAZ to promote additional residential development would be welcomed as this would allow more opportunities for housing development in areas where sites are available, dense character is already established, and which are best served by public transport taking some pressure away from more constrained boroughs such as Richmond where additional sites are very limited.</p>

2.5 Town Centres and High Streets	<p>The Council has made more detailed comments in relation to the role of Town Centres and High Streets in its response to Section 3.3. These comments should be read alongside those provided below.</p> <p>The Council supports the general aim of increasing housing in town centres as part of a suitable mix of uses, where this can support their vitality and viability by, for example, creating a larger population of prospective shoppers and workers. The Council would encourage the Mayor to be mindful that town and local centres and parades are vital locations for delivering essential shops, services and facilities for borough residents and that an appropriate balance should be struck so that centres remain vibrant, diverse and capable of meeting needs. In this respect, it is important that increased amounts of housing in town centres and high streets complements the provision of shops, services and facilities, rather than displacing them. The Council would therefore encourage the Mayor to ensure the new London Plan supports the retention or reprovision of commercial and community uses at ground floor levels within defined centres and strongly resists the loss of ground floor commercial or community uses unless exceptionally justified (including through evidence of long-term unsuccessful marketing).</p> <p>A central tenet of Richmond’s emerging Local Plan is the concept of Living Locally and the 20 minute neighbourhood, where most needs are met within 20 minutes by foot or bike and so creates complete, compact and connected neighbourhoods. Strong and responsive centres which provide a range of shops and services are an important part of facilitating this concept and are much valued by the community.</p>
2.6 Industrial Land	<p>The Council has made more detailed comments in relation to the role of Industrial Land in its response to Section 3.4. These comments should be read alongside those provided below.</p> <p>The Council notes that the current London Plan allows the co-location of homes alongside employment or industrial uses which is intended to enable homes to come forward alongside these uses. However, the Council notes that around 18 per cent of London’s industrial capacity has been lost since 2021 which is an unsustainable rate of loss.</p> <p>The Council would encourage the Mayor to ensure that the new London Plan, in seeking to identify opportunities for housing on industrial land, does not undermine the importance of maintaining a strategic reservoir of industrial land, complemented by locally important employment sites, in creating vibrant communities. The Mayor should work with the Boroughs to prepare evidence which considers the employment needs of both London and individual Boroughs and informs an appropriate strategy which continues to safeguard the most valuable industrial land for its role in supporting both the regional and local economies and providing local job opportunities. The Council is generally cautious over the prospect of “land swaps” whereby industrial land within London’s urban area could be released for housing and re-provided on London’s edge, for example in the Green Belt. The Council would encourage the Mayor to consider whether such a strategy risks undermining local economies by displacing jobs, unbalancing the mix of uses in local areas, and the impacts of creating a greater need for travel from inner London to outer London on local infrastructure and climate change objectives. There should also be regard for the changing nature of industry in London, especially central London, where potential for innovation, adoption of technology and increased productivity can support more intensive use of land and respond to localised clusters and markets that cannot be replicated in more suburban locations. Locations for industrial innovation are explicitly identified in the London Growth Plan.</p>
2.7 Wider Urban and Suburban London	<p>The Council would support greater clarity over the proposed approach to small sites as part of the new London Plan. In particular, whilst the Council supports the principle of the London Plan continuing to support the delivery of small sites, it is important that any use of small sites targets within the new London Plan is based on a realistic assessment of their capacity and likely deliverability, developed in close collaboration with the Boroughs. In relation to this, the Council notes that the current London Plan sought to allocate much higher small sites targets to outer London Boroughs than had previously been the case. Yet, delivery of small sites within Richmond remains significantly below the target. The Council would therefore encourage the Mayor to review whether the assumptions made in the current Local Plan about the propensity of small sites to be developed in outer London Boroughs was sound or if it needs to be reviewed as part of this new London Plan.</p> <p>Reference is made to the contribution that low-density retail parks and car parks could potentially make to housing provision for which there is general support. Site Allocations in Local Plans set the framework for redeveloping several out of centre retail parks, tailored to the needs of the local area, site characteristics and the Local Plan’s spatial strategy. In relation to car parks, it is noted that, since they are now defined as Previously Developed Land (PDL) in the NPPF, there is potentially more scope for their redevelopment than previously.</p>

2.8 Other Sources of Housing Supply	<p>The Council notes the Mayor’s intention to undertake a London-wide review of Green Belt. The Council is of the view that all other sources of brownfield housing supply should be prioritised before any Green Belt release is considered, and that this process, across London, should be informed by comprehensive and robust evidence which considers not only the role and value of local Green Belt but wider sustainable development considerations. In particular, it is important that decisions around the suitability and sustainability of locations for development are led by an evidence-base which appraises their capacity to deliver liveable neighbourhoods, supported by strong public transport accessibility and accessibility to services and infrastructure, as well as the need to preserve green spaces, particular in areas with poorer access to formal green spaces. In many cases, the peripheral nature of Green Belt land around settlements will mean it lacks access to existing services and infrastructure, and, other than in particularly large areas of Green Belt, development will often not be sufficient to generate the improvements to services, infrastructure and green space needed to make the locations sustainable. It is also important that Mayor sets reasonable and appropriate indicators for assessing sustainability considerations. For example, his view that Green Belt release should be based on [...] “access to public and active travel options” should not simply mean proximity to existing public transport infrastructure given proximity does not automatically make a development location sustainable without a proper understanding of how residents of a development would access that public transport infrastructure, the capacity, frequency and diversity of services operating through that infrastructure, and whether or not it is reasonable to conclude that the infrastructure provides access to locations that residents are likely to need to travel to.</p> <p>The Council would wish to acknowledge its relatively recent review of Green Belt, undertaken in 2021, which did not identify any need to release Green Belt from the Borough on the basis of its contribution to the five Green Belt purposes. The Council is a participating borough in the London-wide Green Belt Review and looks forward to working with the GLA and other boroughs, including those in neighbouring Surrey districts, as this work progresses. As above, the Council strongly supports the contention that other potential options should be considered first before turning to this precious resource.</p>
2.9 Beyond London’s Existing Urban Area	<p>Please see comments made in relation to Section 2.8 above.</p>
2.10 Large Scale Urban Extensions in the Green Belt	<p>Without prejudging the outcome of the London-wide review of Green Belt, it is considered unlikely that there will be scope for large-scale development (10,000 plus homes) in Green Belt in Richmond. The Council notes the findings of its relatively recent review of Green Belt, undertaken in 2021, which did not identify any need to release Green Belt from the Borough on the basis of its contribution to the five Green Belt purposes.</p>
2.11 Metropolitan Open Land	<p>The Council supports the Mayor’s intention to separate the policy approach for Metropolitan Open Land (MOL) and Green Belt, recognising that the purposes and criteria for designation are different, as is their role and function. The Council strongly supports the continued protection of MOL which plays a vital role for Londoners in supporting their health and wellbeing with providing public access and recreational opportunities to open spaces (parks, playing fields, or natural landscapes for example) that can support both physical and mental well-being, as well as the strategic role the MOL serves in maintaining and enhancing connectivity of the blue and green infrastructure network which is essential in supporting biodiversity and the local environment. The MOL is also recognised as playing an important role in providing areas of resilience to climate change which are critical in supporting the delivery of policies to combat climate change.</p> <p>The Council commissioned consultants Arup to undertake a review of MOL in 2021 and considered its recommendations in relation to sites as part of the review of the Local Plan, now in its final stage of production. It is recognised that further consideration of MOL will likely be needed in the future. It would be helpful to have clarity as to whether the GLA intends to undertake a London-wide review of MOL. If the GLA intends to undertake a London-wide review of MOL, it is critical that the GLA closely collaborates with individual Boroughs to understand the role and purpose of MOL at a local level.</p> <p>Notwithstanding the Council’s strong support for the continued protection of MOL, should an emerging policy on MOL within the London Plan specify exceptions or indicate where release may be appropriate, such circumstances should be very clearly set out. However, the Council considers that any release of MOL, if appropriate in exceptional circumstances, would be best assessed and achieved through the Local Plan making process, taking into account the wider evidence base and consideration of local development needs.</p>

	<p>In relation to golf courses, the Council notes that there are 7 golf clubs in Richmond and nine golf courses (two of which are 9 hole courses), all of which are washed over with other protective designations. Indeed, 3 golf courses are located in Richmond Park, one in Bushy Park and a further golf course in the Old Deer Park, Richmond (within the buffer zone of Royal Botanic Gardens Kew World Heritage Site), all of which are subject to a strong level of protection from development for purposes which go beyond the MOL designation. This being the case, it seems unlikely that golf courses will afford any significant development opportunities within Richmond.</p> <p>Furthermore, following the Covid-19 pandemic, the Council notes that golf has become more popular. The Council's Playing Pitch & Outdoor Sport Study 2023 and accompanying Strategy 2023 indicate that golf courses in the borough of Richmond require continued protection for their role in supporting outdoor recreation. Any policy approach within the new London Plan which encourages the loss of golf courses would need to be clearly justified against the need to safeguard golf courses for their important recreational role and have due regard to the views of the relevant national body, England Golf.</p> <p>In relation to SINCs specifically, these are areas that much valued for nature conservation, not only in relation to habitat and species protection but as providing connectivity between sites, including providing darks spaces required by some species. Any release, if appropriate in exceptional circumstances, would need to carefully scrutinise the nature and role of these sites which is best assessed and achieved through the Local Plan process.</p>
2.12 Affordable Housing	<p>The Council agrees that the current housing crisis needs considerable attention within the London Plan. As set out within the consultation document, the insufficient supply of good quality and genuinely affordable homes is impacting Londoners and the capital in many ways.</p> <p>Local authorities cannot continue to spend the significant sums on temporary accommodation as it is not sustainable and is highly damaging to the wellbeing of households in this situation. Although the delivery of new affordable housing is a key component of the solution (as expanded upon in the Council's response to 2.13 below), some of the main barriers to new delivery are the wider economic challenges facing Registered Providers, including the previous shortfalls in the maintenance of older housing stock. To allow Registered Providers (RPs) to be able to purchase new stock or build new stock, more needs to be done to help RPs to improve the quality of their existing stock and ease these additional financial burdens which are a significant barrier to new affordable housing development.</p> <p>In addition, the London Plan must seek to address the permitted development rights which mean the large-scale loss of office space (and other uses) to residential can take place without oversight from local planning authorities, and critically in a way which does not require the provision of affordable housing even where the relevant size threshold is met. Not only does this erode important commercial space without due planning consideration, it also results in a significant opportunity cost in relation to affordable housing, representing a 'back door' to a planning permission that foregoes this critical public benefit. The current route to restricting this backdoor, i.e. through Article 4 Directions, only provides very small areas protection and historically the previous Government had sought to significantly curtail the ability for local planning authorities to use these Directions. The Council would encourage the Mayor to give this issue due consideration with a proper approach taken, similar to that which has seen the use of vacant building credit significantly restricted within London.</p>
2.13 Planning for Affordable Housing	<p>The Council agrees with the continued need for the London Plan to plan for a range of genuinely affordable tenures. However, one of the key issues constraining affordable housing delivery is the unequal treatment of affordable housing obligations when it comes to non-conventional forms of housing. As set out elsewhere in the consultation document, less onerous affordable housing requirements from non-conventional housing, combined with other less onerous policy requirements, have created an economic environment where traditional market housing (which is the greatest source of conventional affordable housing) is being displaced by more niche and more specialist forms of accommodation (which often provide restrictive forms of affordable housing). The Mayor should review the London Plan with a view to ensuring that all forms of housing contribute to delivering conventional affordable housing, with the emphasis being on the tenures most needed, including social rented housing. At present the onus to deliver affordable housing is placed solely on major developers delivering C3 housing. The Mayor should balance this requirement, securing a</p>

	<p>proportionate contribution from all small sites, student housing developments, built to rent, co-living etc. to ensure we can deliver the level of affordable housing we need across London. This will also place the burden more fairly across the development industry and provide a pathway to resolving the economic environment which is seeing conventional housing being displaced.</p> <p>The Council supports the approach to embed planning obligations within land values (to ensure that public benefit is not constrained by excessive values) but is very concerned about the prospect of having an overly conservative affordable housing policy which does not take a long-term view on economic cycles, rather focussing on the prevailing economic circumstances at a challenging time. It is absolutely critical that in seeking to acknowledge challenging short-term market conditions, the Mayor does not establish an unambitious or overly negative affordable housing policy which fails to maximise long-term delivery, especially considering that the emerging London Plan period (to 2050) is going to be a longer plan period than previous plans and market conditions are expected to markedly improve well before the end of the plan period. To do so would only benefit landowners and developers by way of profit, and any increases in price paid for the land resulting from an overly relaxed policy burden would also impact downstream in future viability negotiations, reducing the benefit for local communities both now and in the future. The Council would instead encourage the Mayor to consider other ways in which the London Plan could balance short-term market conditions with long-term need, such as the use of review mechanisms or the operation of the Viability Tested Route (VTR), as opposed to any suggested watering down of the overall requirement or tenure expectations.</p> <p>It is understood that the Mayor stands by the current pan-London Fast Track Route, which, as explained through our Local Plan process, we do not fully agree with. The Council does not consider that the threshold approach as currently constructed provides a fair or balanced approach across different types of housing developments. In particular, some forms of housing such as Build to Rent, purpose-built student housing, co-living etc do not need to provide conventional affordable housing, only either Discount Market Rent or affordable student rooms, none of which caters for those in greatest need in the Borough, and all of which contributes to an imbalanced policy environment wherein non-conventional housing has become economically advantageous compared to conventional market housing. As mentioned above, this situation places too much onus on major C3 developments to build the majority of genuinely affordable housing, which is the type most needed across the capital. The new London Plan must require all types of housing development to provide genuinely affordable housing if the Mayor’s strategic affordable housing target is to be achieved.</p> <p>The Council would also welcome a review of the threshold approach which seeks to allow Councils with clear evidence to alter the threshold if their evidence can demonstrate this is deliverable. Having a London-wide threshold which is completely inflexible to local circumstances does not align with the aspirations of the NPPF whereby local circumstances should be taken into account in regard to policy. London is so diverse in relation to house prices, land prices, and affordable housing needs, that a more flexible approach must be considered where evidence justifies this. The Council recognises that the Mayor considers that the threshold approach as currently constructed increases the overall amount of affordable housing delivered, and that local approaches would deliver less affordable housing overall. If the Mayor considers there to be clear evidence that local approaches deliver less affordable housing overall, this must be clearly published and available for public scrutiny. This evidence must also address why any pan-London assumptions have been preferred to local assumptions, and why any pan-London data or hypotheses have been preferred to local data or specific examples.</p> <p>In relation to the provision of affordable housing within the Green Belt, the Council would urge the Mayor to consider the policy approach in place nationally, known as rural exception sites, which works well to deliver higher levels of affordable housing and ensure land values do not become artificially inflated.</p> <p>In relation to tenure, and specifically the proposal to place a greater emphasis on social rented housing, the Council would welcome this as social rent is our greatest and most acute need in the Borough. However, the emphasis should be on flexibility for Local Plans in relation to establishing local tenure mixes, with guidelines in place which can be flexed if sufficient evidence is provided as part of a Local Plan examination to justify a different approach. One approach to tenure does not necessarily work for all London boroughs, so the ability to consider a more evidence-based approach would be more positive, which in some Boroughs could be to require an even greater proportion of social rented housing than the London Plan aspires to deliver.</p> <p>The Council is supportive of Key Worker Living Rent as a new tenure, as expressed in the Council’s response to the Key Worker Living Rent consultation.</p>
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2.14 Estate Regeneration	Overall, the Council would generally welcome the approach considered for estate regeneration, including to require full replacement of social rented homes. However, it would be useful for some elements of the GLA's practice note in relation to estate regeneration to be considered for the London Plan, such as the use of the Fast Track Route. It should also not necessarily be a requirement for all estate regeneration schemes to be viability tested if they are Council-led schemes and re-providing all the existing affordable housing.
2.15 Build to Rent	<p>The Council would not necessarily agree with the statement that Build to Rent (BtR) provides for an intermediate need as often BtR is not affordable to many Londoners on middle incomes, and, in relation to affordable housing, is only required by the London Plan to provide Discount Market Rent (DMR). Given the acute need for social rented housing, and the fact DMR remains unaffordable to a majority of households in need of affordable housing, the Council would strongly encourage the Mayor to review this requirement as part of the new London Plan. The Council would encourage the Mayor to require BtR schemes to deliver social rented housing within a separate block, or if a separate block cannot be accommodated, to make a contribution equivalent to the value of delivering the equivalent amount of social rented housing off-site. With the prevalence of BtR schemes only increasing across London, it is vital that they deliver the types of affordable housing most needed across London to avoid creating a policy and economic environment which undermines the delivery of social rented housing by making forms of accommodation which do not deliver it relatively more viable.</p> <p>The Council welcomes the statement that BtR should deliver genuinely affordable housing, but, as above, the onus must be on the provision of Social Rent, or London Living Rent but with the possibility of setting it at a lower income cap so it is closer to Social Rent levels.</p>
2.16 Other Housing Options	<p>In relation to specialist housing, given the evolving nature of the demographic in London the key is to delivering housing that meets multiple needs and is easily adaptable. As an example, the Government recently brought in restrictions on international students bringing dependents, which among other recent changes has resulted in a decline in student numbers in many universities across London. The delivery of specialist housing can result in the creation of inflexible accommodation that is less able to adapt to changes and the needs of Londoners. For example, we have seen large losses in Richmond from the redevelopment of a very large block of student housing, as the need for that accommodation is no longer there. This could be a real issue in the long-term with large blocks of specialist housing, resulting in buildings that either remain vacant for long periods of time (as this block has been), or which lead to large housing losses. A more adaptable approach to specialist housing is needed, and an emphasis on applicants needing to clearly demonstrate need in a specific area before proposals of a specialist nature can be supported.</p> <p>In terms of student housing and co-living, the Council would also support stronger definition of overconcentration when considering proposals for specialist forms of accommodation. This will allow LPAs to help create more balanced communities coming forwards which are not purely prioritising student, co-living and supported housing.</p>
2.17 Specialist and Supported Housing and Housing London's Older Population	<p>There is a desperate need for more specialist affordable housing, with many Registered Providers not wanting to take on specialist affordable housing, plus a lack of funding available to tackle the current crisis. Temporary Accommodation for specialist housing is in very short supply, and can sometimes result in very vulnerable people being placed well away from their support network and sometimes even out of borough. More funding is needed to help support the delivery of specialist affordable housing or incentives provided to ensure specialist affordable can be delivered. With a mental health crisis in the UK and forecast increases of people with illnesses such as dementia, advocating for this type of accommodation will be very important in the new London Plan.</p> <p>Although meanwhile uses could promote this use, such as for emerging accommodation for homeless people, Councils often don't have the ways and means to allow for meanwhile uses, or the resources/storage opportunities etc to potentially tap into temporary accommodation. A way to help this could be for the GLA to have a pool of modular homes, that could be booked for a period of time by LPA's. Investing in these units when LPA's may not have the storage available can be very risky. This is where a London wide approach could be applied, however, we understand this would be outside the scope of the London Plan.</p>
2.18 Purpose-Built Student Accommodation and Other Forms of Shared Housing	The Council agrees with the statement that too much of this type of accommodation can reduce the availability of general needs family housing and, if unmanaged, can alter the character of communities.

	<p>The London Plan needs to clearly set out there are different types of accommodation that can provide for students and more organically space students within the existing population and allow an element of choice within the student population to consider different routes of accommodation. For example, current needs studies are often carried out on the premise that all students could reside in PBSA, however, the PBSA model does not necessarily meet the needs of all types of students. A clearer more balanced picture of student requirements is required, which is based on realistic and sufficient local assumptions that can then be relied upon in local plan preparation and decision-making. The Council has particular concerns over how the London Plan presents a London-wide need figure which does not provide councils with the ability to critically analyse the true need for student accommodation when developing their local plans or making decisions on individual planning applications. The overall impact of this is that the ability for councils to meaningfully restrict the ability for PBSA to displace conventional housing is weakened, even where the need for conventional housing (and the conventional affordable housing it delivers) is demonstrably greater and more acute than the local need for PBSA. The Council would encourage the Mayor to consider whether the current approach to PBSA within the London Plan is adequately safeguarding the need for conventional affordable housing or whether a new approach, including setting local targets, may be more appropriate. Similarly, the current policy approach aims to focus student housing in locations which are in a high PTAL which theoretically allows students to access different campuses in other parts of London more easily. Although in theory this seems like a logical approach, in practice, this results in even more intense competition for scarce land between conventional housing and student housing on these well located sites. In many cases, the need for well-accessed locations is even greater for the permanent households displaced, who may have more limited means and need access to their place of work, access to services facilities etc. As stated elsewhere in the Council's response, this is compounded by an economic and policy environment which means that certain non-conventional housing types, such as student housing, have become relatively more viable, are therefore able to outbid developers delivering general needs housing, and displacing and harming the supply of conventional and conventional affordable housing.</p> <p>For these reasons, the Council considers that all housing sites should be required to deliver conventional affordable housing, including social rented housing on-site, or at the very least make a contribution towards social rented housing. In the case of student accommodation, this contribution towards conventional affordable housing should be included in the London Plan as a priority before affordable student housing to ensure policy burdens are more evenly balanced and to ensure all housing sites are delivering genuinely affordable housing which there is a demonstrably greater and more acute need for.</p> <p>In addition, the Council does not necessarily agree that HMOs are always a 'relatively affordable' form of accommodation for people. HMOs can, in some cases, be of very poor quality, which can result in poorer levels of wellbeing for occupants and in some cases be associated with very costly utility bills for occupants (especially relevant if EPC ratings are very low).</p> <p>In relation to HMOs, and as previously mentioned, the Council considers that all house types should be required contribute towards Social Rented housing in light of the great and acute need for this housing. Even though the level of contribution from a HMOs is likely to be lower than from PBSA, requirements for all housing to either deliver or contribute towards genuinely affordable housing is key to delivering the housing needs for Londoners and preventing London Plan policy inadvertently creating the economic and policy conditions which mean certain forms of housing that do not best meet local needs displace those which do.</p> <p>In relation to the challenges of balancing these requirements, it would be useful for the London Plan to set out higher level strategic aims for the delivery of student accommodation, such as a focus to deliver student accommodation in line with the needs and requirements of individual boroughs. The Council consider it is essential that any additional student accommodation is directly linked to a university, as this provides clear evidence of need for the student accommodation in that location.</p> <p>As above, the Council agrees that all non-conventional housing types need to contribute towards conventional affordable housing provision as currently these forms of housing are being unintentionally favoured due to the lower policy burdens put upon them. In relation to PBSA, the London Plan could apply a FTR threshold but defer to individual local plans to set an appropriate mix between conventional affordable housing (in a separate block or through a financial contribution) and affordable student housing, based on local circumstances and evidence. This could include the London Plan setting upper and lower bounds, similar to how the tenure mix is included within the current London Plan. This would allow flexibility across London, including evidence to justify the tenure split, level of need required and viability. However, in light of the significant and acute need for social</p>
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	rented housing, the London Plan would need to clearly identify the preference that ought to be given to Social Rented housing over affordable student accommodation, as this is the tenure most needed across the capital.
2.19 Gypsies, Travellers and Travelling Showpeople	<p>Although the need for pitches across London is fairly modest when compared with other housing requirements, high land prices and the low density nature of Gypsy and Traveller pitches make it very difficult to provide additional pitches if there is no space near existing Gypsy and Traveller sites to extend. This is especially difficult where there are multiple pressures on land within London, and in light of the presumption in national policy in favour of optimising sites effectively especially on brownfield land. This is especially the case in Richmond, where we have very few sites available and have a very high housing need, which makes finding suitable sites for pitches is very challenging.</p> <p>In relation to pitch requirements, we would strongly recommend the London Plan does not set targets for pitches either London wide or by borough, and that it remains the responsibility of individual boroughs to identify pitch requirements, as individual boroughs will have a far better and more local understanding of their Gypsy and Traveller community, their needs for pitches and where additional pitches can be accommodated. This is also supported by the fact that need for additional Gypsy and Traveller pitches varies significantly across London and as such the extent to which it is a strategic issue also varies.</p> <p>In relation to the transit provision, the Council considers that a London-wide target for transit pitches is unlikely to help achieve the delivery of the required pitches in practice. It would be better for the GLA to work individually with boroughs where there have been regular unauthorised traveller encampments and assess what solutions could achieve better and longer term outcomes.</p>
Growing London's Economy	
3.1 The Central Activities Zone	While the CAZ does not extend to the borough of Richmond-upon-Thames, the Council recognises the economic and cultural benefits of good transport connectivity to and from the CAZ.
3.2 Specialist clusters of economic activity	<p>The Council notes that the Mayor is considering whether the new London Plan should specifically identify clusters of economic activity outside of the CAZ with a view to “providing a new flexible recognition of the range of locations that support London’s economy”. While the Council recognises there may be a benefit in recognising the specialist clusters that support London’s economy, the Council would not want the identification of specialist clusters to:</p> <ul style="list-style-type: none"> negatively impact more mixed use industrial or business areas outside of identified clusters lead to greater pressure for alternative (non-economic) uses on mixed use areas not within an identified specialist cluster. <p>The Council notes support for the development and evolution of new clusters, including investment in transport infrastructure. It would be useful to better understand how these clusters would be identified and what support could be provided. For example, would new clusters be based on existing smaller/developing clusters, those identified within Local Plan area strategies/site allocations or based on areas of land with the characteristics considered appropriate for creating new clusters?</p> <p>The Council would encourage the Mayor to also consider how the identification of economic clusters would translate into land use policy. For example, sometimes clusters require specialist buildings, but often sector requirements can increasingly be accommodated in flexible accommodation that can adapt to changing requirements, including business needs outside of a particular cluster/sector. In this respect, the type and nature of space required to support clusters may not always be dissimilar to the type and nature of space required to support other forms of economic use. The new London Plan should facilitate cluster development as set out in the London Growth Plan but not be so prescriptive as to hinder other forms of workspace investment.</p> <p>The London Growth Plan recognises Richmond town centre as a ‘regionally significant office cluster’ and Richmond town centre and Kew as an ‘Internationally significant visitor destination’. Alongside this, there are notable clusters in the science and life sciences sectors in Teddington</p>

	associated with the National Physical Laboratory and LGC Ltd (previously known as the Laboratory of the Government Chemist). Twickenham Film Studios forms part of the west London film and TV sector.
3.3 Town centres and high streets	<p>Ensuring that high streets remain a central feature of London’s economic and civic life:</p> <p>The Council welcomes the continued support for town centres proposed. It also supports flexibility in terms of uses which are appropriate, subject to consideration of the impact of new uses.</p> <p>Additional housing in town centres is welcomed in principle and considered above (2.5).</p> <p>The Council supports the additional flexibility within the town centre network being considered, subject to development coming forward not being of a wholly inappropriate scale for the size and function of the centre. Particular care may be needed in relation to retail to prevent large developments being tagged onto small centres.</p> <p>We welcome the acknowledgement that some requirements and restrictions are necessary – relating to specific land uses and/or where concentrations of uses may occur. This is in line with the objective of increasing housing in centres.</p> <p>Flexibility in design is supported and is existing policy in the Local Plan.</p> <p>The Council considers that planning policy should be able to stipulate an active use is required where planning permission is sought, recognising that changes to the Use Classes Order has provided previously unprecedented flexibility for change of use. It may be appropriate to designate some areas as suitable for late night uses, subject to local considerations and impact on amenity. Local plans are best placed to determine if this would be beneficial and where these areas might be. In relation to permitted development rights for conversion to residential, the Council considers that an extensive and through process was undertaken to satisfy the Secretary of State that the Article 4 Directions then proposed were defined as tightly as possible. A great deal of careful work was undertaken in relation to defining boundaries. In Richmond all centre boundaries were reviewed and/or defined as recently as 2023 as part of the Local Plan process. Whilst it is recognised that boundaries are not static, it is for the Local Plan based on evidence, to redefine centre boundaries.</p> <p>The Council does not wish to propose any further centres be included in the Mayor’s town centre network.</p> <p>The Council supports proposals to reactivate high street properties, where appropriate. It is noted that the High Street Auctions process is not particularly responsive to change, although valuable in areas where vacancy rates are particularly high.</p> <p>Challenges and changes to Use Class E:</p> <p>Noting comments about changes to introduce Class E, and the London Plan taking a very flexible approach to the range of businesses in town centres and high streets. There are already a wide range of alternative uses that could be accommodated within traditional office buildings within town centres. However where proposals would involve change of use outside Class E (uses cited being places of worship (F1f), health (Ee) and educational uses (F1a), nursing homes(C2)), the Council is of the view that this assessment still needs to be considered through the planning process, as it allows officers to weigh the benefits of a specific proposal alongside the need to protect the long-term supply of employment floorspace, as identified in evidence base reports undertaken to inform the Local Plan policies.</p> <p>Provision of office floorspace remains a priority in the borough’s town centres. Richmond is the borough’s main office market and the Employment Land and Premises Needs Assessment recommended it as the prime location, with both demand and viability, to focus and prioritise office growth. The London Plan’s town centre network identifies Richmond as a centre with speculative/mixed-use office potential (recognised in the London Growth Plan as a ‘regionally significant office cluster’), Twickenham with mixed-use office potential, and for Teddington and East Sheen to protect small office capacity where there is demand for existing office functions.</p>

	<p>The Council would encourage the Mayor to consider and review local evidence to inform his proposed approach to economic policies. The Employment Land and Premises Needs Assessment for Richmond (2021, updated in 2023) found that despite strong restraint policies, the Borough had continued to lose office stock, in part as a result of permitted development rights. The Employment Floorspace Monitoring Report 2022-2023 found that over the 10-year period since 2013-14 over 113,000 sqm of office floorspace had been lost in the borough. The 2023 employment evidence identified that for the forecast period 2019-39 there was a shortfall of approximately 23,000sqm of office floorspace. A strong policy position protecting offices, particularly in the town centres and Key Business Areas, is therefore considered important in ensuring that improvements are made to existing offices to attract occupiers (including to meet current environmental standards) by preventing their loss to alternative uses (without robust evidence of lack of demand), and thereby benefiting the economic sustainability of the borough.</p> <p>The borough has a very limited pipeline of office floorspace, and is seeking to retain existing offices to meet future identified needs. The emerging Local Plan policies take a long-term view in relation to the protection of offices, in light of overall losses of employment floorspace, to retain a strategic reserve of floorspace. Where there are proposals for alternative commercial uses for existing office space in town centres, this can effectively be dealt with through the planning process to allow officers to consider wider impacts</p>
3.4 Industrial land	<p>Alongside the rest of London, the borough has continued to lose industrial land, which is vital for servicing local residents, businesses and visitors, and providing opportunities for local employment. While the borough has sought to provide additional policy protection to existing industrial areas by identifying Locally Significant Industrial Area (LSIA) designations, smaller and standalone industrial sites also make an important contribution to the reservoir of industrial land. While employment policies seek to also offer protection against change of use on these sites (for example through the requirements for robust marketing evidence), due to the introduction of Class E, it is not always possible to stop light industrial/ancillary office changing to other commercial uses and/or residential under permitted development. The Borough has introduced Article 4 Directions covering town centres and designated employment sites, but these were modified by the then-Secretary of State to cover much smaller areas compared with the original Direction.</p> <p>The Borough experiences significant pressure on its industrial land to change use to residential, and where new employment floorspace is proposed as part of planning applications, it does not necessarily seek to replace the existing industrial uses, but rather provide more general class E commercial floorspace, which does not re-provide accommodation for the types of uses that would previously have occupied the sites. As a result, these uses may be pushed further out of London as they struggle to find suitable and affordable workspace.</p> <p>While the London Plan could set out strategic industrial needs for London, this may be more suited to those Boroughs where there is more land available to provide additional industrial capacity. The focus of the Council's Local Plan is on protecting existing industrial sites, and intensifying these where feasible, to meet local economic needs, due to the lack of availability of additional sites.</p> <p>The suggestion of releasing industrial sites and providing replacement capacity in other locations (for example in the green belt) is not supported due to the potential impact on availability of sites to meet business needs, service the local economy and residential populations and provide local employment opportunities. Rather than being a location to re-locate existing industrial land, it may be that such land presents greater opportunities for accommodating new, space-hungry economic uses such as data centres.</p> <p>The Council would encourage the Mayor to consider and review local evidence to inform his proposed approach to economic policies. The evidence undertaken to inform the emerging Richmond Local Plan (Employment Sites and Premises Needs Assessment 2021, updated 2023) found that there was an additional requirement for 60,000 sqm of industrial floorspace for the forecast period 2019-39, that vacancy rates were below the London average for industrial land, and that the borough had continued to lose industrial stock (VOA recorded a total stock of 163,000 sqm in 2015, falling to 141,000 sqm in March 2022). The borough lacks sites for the development of significant new employment space and is challenged in its ability to deliver intensification of industrial space (as supported by the London Plan), due to existing industrial sites being commercially successful – being in</p>

	<p>reasonable condition and well-let – and therefore removing commercial logic and motivation to redevelop the space. Because of the nature of the borough and historical patterns of development, it is common for employment sites to be in mixed-use and residential areas which can severely constrain the ability of sites to accommodate intensified development, for access and amenity reasons, as well as the potential to impact on local character and the historic environment.</p>
3.5 London's night-time economy	<p>Please see the Council's wider comments within the economy chapter which also partially relate to London's night time economy.</p> <p>The Council supports the principle of the London Plan acknowledging London's night-time economy and including appropriate and balanced measures to support this economy. The Council itself has developed a Night-Time Strategy which it considers is a useful tool for understanding and managing night-time activity, creating a safer, more vibrant, and inclusive experience for all residents, workers, and visitors. The Council would strongly encourage the Mayor to review its Night-Time Strategy when progressing the new London Plan.</p> <p>Within the new London Plan, it may be appropriate to define clusters for late licences in centres of a certain scale, subject to consideration of wider impacts. It is noted that in Richmond there are Cumulative Impact Policies in place under licensing powers, in Richmond and Twickenham which restrict new drinking establishments. In this context, the cumulative impact of additional night-time premises needs to be considered, not just because of the potentially detrimental impacts of such developments on in particular residential amenity, but also the impact on the high street where certain uses may not be open during the day or all day and the need to ensure balance between the vitality of these spaces at different times.</p>
3.6 Culture and creative industries	<p>The Borough is home to the RFU Stadium at Twickenham which is a key sporting and cultural asset not just for Richmond but of national significance. The London Plan should acknowledge and appropriately plan for such sporting and cultural assets, recognising that this includes planning for and addressing wider consequences of the success of these assets, such as incorporating the traffic implications within transport need assessments.</p> <p>The Council considers that a London-specific approach to the Agent of Change principle could be beneficial given London's density, land use pressures, and a more complex mix of uses and functions compared to other parts of the country.</p> <p>There are no designated Creative Enterprise Zones (CEZ) within the borough, and while the Council considers that they could be useful when identifying specialist clusters of economic activity, the London Plan should also review borough's adopted and emerging Local Plans to identify other specialist clusters of economic activity linked to cultural and creative industries. For example, the emerging Richmond Local Plan and accompanying Policies Map identifies Cultural Quarters in Richmond and Twickenham.</p>
3.7 Visitor economy	<p>The Council has no specific objection to taking a more flexible approach to providing additional visitor accommodation in areas where there is good transport accessibility and/or in centres. However, it is important that the introduction of a more flexible approach in the new London Plan to the location of new visitor accommodation does not undermine opportunities for the delivery of conventional housing. The Council's emerging Local Plan states that proposals for new visitor accommodation proposals will be assessed in the context of maximising housing delivery, including affordable housing, and that in existing residential areas, there will need to be consideration whether a proposal for visitor accommodation would compromise capacity to meet the need for conventional dwellings.</p> <p>The Council shares concerns about the growth in short-term let accommodation and the impacts this can have on displacing conventional housing supply. The Council's emerging Local Plan recognises the benefits of short-term holiday rented accommodation in sustainable locations, but using for more than 90 days a year will be resisted where there is a detrimental impact on the existing housing stock.</p>
3.8 Digital infrastructure	<p>The Council recognises the strategic importance of digital infrastructure to London's economy, to deliver the vision set out in the London Growth Plan, and agrees that digital connectivity infrastructure should be integrated with broader utility planning wherever possible. The Council considers it important to avoid overconcentration of equipment and installations to support telecommunications and digital infrastructure as this can have</p>

	<p>harmful impacts on the borough's unique and distinctive character. Initiatives for the provision of utility and digital connectivity infrastructure must be carried out in a way that is sensitive to local character and the environment.</p> <p>With regard to data centres, the Council notes that they typically offer low employment density and limited integration with other industrial and warehousing uses. The Council would be concerned about their potential impact on existing industrial stock in a borough with high demand for industrial land but severely limited supply. The practical issue of encouraging data centres within London's urban area is the risk of displacing industrial uses which provide far more employment per square metre and which rely more on access to areas of population (for workers and/or customers). The new London Plan should therefore prioritise the location of data centres in areas with more capacity for such uses where the risk of displacement is lower (including to collaborate with areas outside of London) and to explore the co-location of data centres with other compatible industrial uses where feasible to minimise displacement. Data centres also exert significant additional demand for power which can have an impact upon employment and residential uses. The capacity of and accessibility to local power networks should be a key consideration when identifying locations for data centres in order to avoid restricting development of other uses.</p>
3.9 Access to employment	<p>The Council notes the Mayor is considering a London-wide brokering arrangement. There is little justification for such an arrangement provided in the document and the most effective arrangements for the provision of employment support services across London are best considered as part of the Mayor's forthcoming Inclusive Talent Strategy. The Council would note it already has its own established and successful Work Match service to support local people to access jobs and training drawing on close collaboration with developers and an in depth understanding of local community needs. The Council would encourage the Mayor to work with Boroughs to understand how a London-wide employment brokering arrangement would co-exist with existing borough and local-based services, which are experienced and effective in delivering employment and training opportunities locally, including during construction phases. The Council also has experience of working collaboratively across neighbouring boroughs in this area and the practical requirements of putting such arrangements in place. It may equally be that the Mayor's attentions would be most useful in helping to establish job brokerage arrangements within Boroughs which currently do not benefit from them.</p>
3.10 Affordable workspace	<p>The Council supports the provision of affordable workspace to encourage broader participation in entrepreneurship and for specialist sectors and recognises that there is a demand for a greater diversity of workspaces beyond the standard office format. The emerging Local Plan recognises that locally there is a shortfall of affordable workspace for firms and sectors that cannot operate in the traditional office and co-working spaces, including flexible 'studio workroom' units and ground floor light industrial and larger industrial units for creatives, local makers and film-related industries. The new London Plan should encourage developers to actively engage with boroughs at pre-application stage to identify those locally significant specialist sectors that are of particular importance to the borough's local economy which would benefit from the provision of affordable workspace.</p> <p>While the Council recognises that there may be practicality or viability challenges associated with the delivery of affordable workspace in particular industrial and warehousing developments, the Council does not consider it appropriate to remove the requirement for affordable workspace in industrial developments across the whole of London. The Council's emerging Local Plan will introduce the requirement for affordable workspace in new industrial development (and has already led to some affordable workspace being secured within a proposed self-storage development). The Council's latest Employment Land and Premises Needs Assessment (2021 and 2023 update) found that there is a gross demand for approx. 61,000sqm of industrial floorspace across the Plan period, however there is an extremely limited pipeline supply. Therefore, the Council considers it important to secure affordable workspace in major industrial developments that meet the relevant thresholds as the opportunity to do is likely to be infrequent given the constrained nature of the borough.</p> <p>The Council also considers that disapplying the policy requirement for affordable workspace on all industrial sites could lead to less affordable light industrial workspace being delivered, as new Class E(g)(iii) floorspace often comes forward in conjunction with B2 and/or B8 uses. This is particularly the case for certain sectors, in particular the creative sector which is identified as a priority in the London Growth Plan.</p> <p>A coordinated approach to affordable workspace delivery could be beneficial however the Council considers it essential that new affordable workspace should be provided on-site in the first instance as in most cases this will have a greater economic impact and certainty of delivery. Due the</p>

	<p>constrained nature of the borough and a limited pipeline of development that would require affordable workspace, opportunities for on-site provision are likely to be few, let alone the potential for offsite provision and pooling of financial contributions.</p> <p>The Council considers that requiring a more consistent approach to affordable workspace policy across London risks being ineffective as it could fail to consider local circumstances and undermine adopted and/or emerging policy approaches in specific boroughs that are supported by evidence. For example, the rate of discount required for workspace to be genuinely affordable can vary significantly both within and between boroughs and a London-wide approach could therefore disadvantage those Councils who can demonstrate a higher rate of discount is achievable within their own Borough. However, there is scope for greater consistency of approach and sharing of best practice to ensure a more streamlined approach whilst respecting local characteristics. The Council is already reviewing affordable workspace policies in other boroughs in this regard and would welcome a collaborative approach between boroughs and the GLA with regards to the London Plan policies in this area.</p>
<p>London's capacity for growth and design quality</p>	
4.1 Building height and scale	<p>The Council recognises that, in order to address his ambition to significantly increase the amount of housing delivered, the Mayor will be looking to review appropriate building heights and scale across London as part of the new London Plan. It is agreed that the density in London is generally low compared to many European cities, largely due to the development process following the construction of railways.</p> <p>The Council supports the principle of small site development and has developed mid-rise zones within its Local Plan which support this and allow gentle densification of certain areas.</p> <p>The Council would express some reservation over the Mayor's suggestion that minimum building heights could be set across London, given London's neighbourhoods, character and capacity to accommodate height, vary significantly both within Boroughs but particularly across different parts of London. A minimum height threshold that applies across London, even with an exemption for conservation areas, risks being a very blunt tool with unforeseen consequences at a neighbourhood-scale. The Council would therefore encourage the Mayor to consider ways in which this principle could be captured within a more precise mechanism, for example by expressing a general indication within the London Plan, with responsibility for identifying minimum height thresholds set within Borough Local Plans on the basis of detailed urban design and heritage analysis. Whilst this could also be captured within the Mayor's suggested London-wide small site design code, the Council would again be concerned over the ability for a London-wide design code to address London's diversity of character without requiring that code to be substantially vague or open-ended, or else risk a proliferation of development which meets the requirements of the code but is out of keeping with local character. This would similarly be an area where the Mayor may wish to consider establishing broad principles and a general direction at the London Plan scale, with responsibility for localisation deferred to Borough Local Plans, on the basis of detailed urban design and heritage analysis.</p>
4.2 Tall Buildings	<p>In relation to tall buildings, the Council notes that the current London Plan requires boroughs to identify areas that may be suitable for tall buildings. The Council's Local Plan therefore contains a number of 'tall building zones' which were informed by a detailed Urban Design Study.</p> <p>The Council wishes to express concern over the prospect of designating tall building zones becoming the responsibility of the London Plan. It is considered that tall building clusters should only be identified in the London Plan where they relate to Opportunity Areas. Other clusters and tall building locations should be identified in Local Plans, based on robust evidence base as set out in comments in 4.1.</p> <p>As included in comments elsewhere in this section, the Council would have concern over the ability for a London-wide assessment of urban design capacity to meaningfully address local character and sensitivity. A London-wide approach, unless informed by an incredibly detailed and involved</p>

	<p>study, would inevitably require some degree of broad brush analysis, which would increase the prospect of tall buildings being identified in areas which individual Boroughs would not consider suitable. The Council would instead encourage the Mayor to strengthen the expectations within the London Plan around the role of individual Boroughs in identifying tall building zones and to positively advocate for approaches, such as that taken by the Borough, whereby a detailed but local Urban Design Study has directly informed the development of relevant tall building policies within a Local Plan.</p> <p>It is also considered that the current benchmark for defining a tall building at 7 storeys/21 metres is appropriate and there are concerns that changes to this could impact on the local plans already drafted and adopted which take this into account. This could require re-drafting of relatively newly adopted local plans when the benchmark appears sound. Instead, the London Plan could introduce the concept of mid-rise buildings as per the Richmond Local Plan.</p> <p>The Council would encourage the Mayor to provide greater clarity over the proposal that the London Plan could be clearer about how planning applications for tall buildings should be assessed outside of tall building zones. In particular, the Council would be keen to avoid a scenario whereby the London Plan creates a clear route for developments to circumvent the requirements of evidence-based tall building zones identified in Local Plans.</p> <p>The Council would be cautious over any proposal to remove direction from the London Plan over individual Boroughs identifying tall building zones. The Council considers that, on balance, the identification of tall building zones within Local Plans creates a stronger plan-led approach to strategic development across London and establishes clear expectations for communities, developers and infrastructure providers. The Council considers that the absence of tall building zone identification can lead to scenarios whereby tall buildings come forward more unexpectedly which has the inverse effect.</p>
4.3 Supporting a denser London linked to transport connectivity	<p>The Council supports the broad principle of locations with higher public transport accessibility being more sustainable locations for development, subject to wider comments made throughout this response.</p> <p>In relation to the reference to Crossrail 2, the Council would support greater clarity from the Mayor over the role of Crossrail 2 within the new London Plan window. In particular, the Council would highlight inconsistencies between the diminished role that Crossrail 2 is expected to play in support growth within the Opportunity Area section with the continued role it is identified as playing in supporting a ‘denser London linked to transport connectivity in this section’. The emerging London Plan appears less to give less weight to Crossrail 2 as a priority for unlocking growth and homes than the recently published London Growth Plan – the London Plan should be aligned with this ambition.</p>
4.4 London’s heritage	<p>The Council agrees that London is world-renowned for its heritage and built environment. Its historic buildings and landscapes are of cherished importance and help to sell London as an important tourist destination. It is considered that greater account should be given in the London Plan on ensuring the settings of these important heritage assets are protected from harmful development like inappropriate tall buildings.</p> <p>We welcome the opportunity for the London Plan to provide clarity on the role that heritage assets can play in meeting net zero and improving resilience to climate change. There is a misunderstanding that historic buildings cannot be sensitively retrofitted and adapted, and we would welcome evidence to help inform this approach. Within the Borough, we have some successful examples of retrofitting to historic buildings which can be shared to feed into the evidence base.</p>

	We would welcome the opportunity to consider certain views within Kew Gardens being formally identified as strategic views in the LVMF given the site's high significance and WHS status.
4.5 Designing the homes we need	Please see wider comments in this section.
4.6 Heat risk, ventilation and overheating	<p>The Council declared a climate change emergency in 2019, has a climate change action plan, and has made commitments to become a carbon neutral organisation by the year 2030 and zero carbon borough by the year 2043.</p> <p>The Council supports the approach of the new London Plan to be more rigorous on passive design and ventilation measures, but to go with national standards for active design. For the active measures it would be helpful if there was some flexibility should Local Plans want to pursue a more detailed approach. It would be useful for this to be informed by detailed modelling and designing which incorporates the prospect of warmer conditions.</p> <p>It would be beneficial for the GLA to provide guidance on best practice on passive design and ventilation measures and to understand the cost and viability impact versus powered heating, ventilation and cooling solutions. Whilst the Council supports the prioritisation of passive design, it is important to understand the impact on construction costs and whole plan viability</p> <p>There needs to be flexibility to reflect national standards as they change, however, as above, it is important that individual Boroughs are able to introduce policies which go beyond national standards to ensure, in the Council's case, it achieves its net zero target by 2043, and for the Mayor to achieve his pledge to make London a net zero carbon city by 2030.</p>
4.7 Homes for families	<p>The Council agrees with the approach of leaving family housing requirements to be determined by individual boroughs. We consider that what constitutes a family-sized home (e.g. according to bedroom numbers) should be able to vary by borough, as the demographics of boroughs (such as the average size of families) are different - as we see the case being between Richmond and Wandsworth. A pan-London strategic approach could prevent the Council from taking the localised approach it currently does which, for example, is more accepting of site optimisation in town centres but more strongly seeks to protect existing family accommodation outside these areas. It is far better for boroughs to set this approach based on their own local circumstances.</p> <p>A strategic approach to the loss of family sized housing is likewise not recommended, as demographics can vary substantially between boroughs. For example, parts of London have much higher rates of multigenerational living, whilst other areas can see higher numbers of individual parents. It is therefore important that boroughs are able to identify what they consider to be the most appropriate forms of family sized housing to protect in their borough.</p> <p>In relation to making areas more child friendly, a London wide approach would be difficult to achieve. Whilst we consider it may be possible to identify design principles which seek to achieve this, we would recommend that specific measures to achieve this should instead be left to local authorities to set out based on their local demographics.</p>
4.8 Accessible housing	<p>The Council notes that the current London Plan requires 10 per cent of new homes to be wheelchair accessible or adaptable in line Part M4(3) of the Building Regulations. It only requires full wheelchair accessible homes within low-cost rented housing, including social rented housing.</p> <p>The Council notes the Mayor is considering whether wheelchair accessibility standards should be sought from a proportion of non-affordable housing, e.g. market housing. The Council supports the broad principle of this but would suggest a consistent London-wide approach to wheelchair housing</p>

	<p>from non-affordable housing may be difficult to implement, especially as different Boroughs will have different levels of need in relation to wheelchair accessible housing. It may therefore be more appropriate for this decision to be deferred to Local Plans where an appropriate percentage could then be informed by a local understanding of need. However, the Council would agree with the option for there to be a greater emphasis for providing wheelchair accessible housing from intermediate affordable housing tenures, on the proviso that it is defined in close collaboration with Registered Providers. Whilst the principle of delivering more wheelchair accessible housing is, of course, supported, it is important that the percentage sought is set at a level to meet likely need, rather than a level that would significantly exceed need, given that adhering to the M4(3)(b) standards does have financial and density implications on development. If, for example, a minimum mandatory London-wide percentage was introduced at say 5%, but the need in a particular area was only for 2%, this additional requirement may then unnecessarily reduce the overall amount of affordable housing that can be achieved, especially within larger schemes. In this respect, the Council would encourage the Mayor to consider whether the appropriate percentage of fully wheelchair accessible homes to be sought from non-affordable housing is an issue that is consistent enough across London to be addressed through a London Plan policy, or whether it should instead be set through Local Plans, informed by local needs assessments.</p>
4.9 Space standards and other requirements	<p>The Council supports the principle that the London Plan should continue to opt in to the Nationally Described Space Standard (NDSS) as a minimum expectation, exceeding these (and allowing Local Plans to exceed these) where justified.</p> <p>In addition to the NDSS for new self-contained homes, the Council considers it would be beneficial for the Mayor to consider expanding the use of space standards and facility standards for forms of non-self contained housing which are not currently well-covered by the NDSS, including, for example, larger Housing of Multiple Occupation (HMOs). London Plan Policy H16, which addresses large-scale purpose built shared living, includes a list of communal facilities envisaged to be included (at part 6). As a result, proposals for large HMOs may be argued to not fall under London Plan policy H16, and therefore within the scope of the quality criteria within it (at point 7), because as a form of housing they were either not purpose built or do not provide many of the facilities seen to characterise large-scale purpose-built shared living as a housing product, such as a concierge or a bedding and linen changing and/or room cleaning services. This, as just one example, creates a potential policy vacuum which can, in the worst cases, be exploited to provide homes which fall below the standards that the Mayor and/or the Council aspire to achieve.</p>
4.10 Designing for everyone	<p>The Council supports the principle of the London Plan ensuring that places and developments are designed to be accessible and usable by all in society. This should include the incorporation of inclusive and accessible design from the earliest stages of design development, for both new buildings and refurbishments, and include not just buildings but the wider public realm. The Council also supports the principle that any private spaces delivered as part of developments should be inclusive to the public, where possible, and that inclusive design should include consideration of how buildings and spaces are used at night, including in the context of travel to and from places outside of daytime hours.</p>
London's infrastructure, climate change and resilience	
5.1 Energy efficiency standards	<p>The Council encourage the Mayor to take an ambitious and positive approach to addressing climate change through the new London Plan. As stated elsewhere in its response, the Council declared a climate emergency in 2019 and has developed a Climate Change Action Plan which sets out the ways in which the Council will achieve its ambitions to become a Carbon Neutral Council by 2030 and a Net Zero Borough by 2043.</p> <p>To support these ambitions, the Council supports the Mayor's intention explore setting "different energy standards for buildings" as it presents an opportunity to align London policy with leading industry practice. The Council encourages the GLA to consider adopting the approach of Energy Use Intensity (EUI), as used in frameworks like LETI. These provide a more accurate measure of building performance and help ensure energy efficiency improvements.</p>

	<p>The Council appreciates the need to review the role of carbon offset, as well as the targets and metrics employed, to ensure their effectiveness in achieving genuine carbon reductions. In this regard, the council urges the Mayor to consider implementing a new London wide minimum carbon offset price, which aligns with the actual cost of carbon and addresses local climate action requirements. Through its Local Plan, the Council is seeking to establish a £300/tonne carbon offset price. This proposal accounts for a truer reflection of the impact of carbon emissions thereby ensuring that offsetting is utilised as a last resort rather than a means to bypass onsite actions</p> <p>The Council would encourage the Mayor to incorporate Energy Use Intensity (EUI) as a fundamental metric within planning policy and building performance standards, in accordance with Policy Option 2 from the Haringey report <i>Delivering Net Zero</i> (May 2023). Compared to existing compliance based approaches such as SAP, EUI provides a transparent and performance focused method by focusing on actual energy consumption, both in predicted models and measured post occupancy. Adopting EUI would enhance accountability by enabling post occupancy verification of building performance using real metered data, helping to close the performance gap between design and operation. It also allows for more meaningful comparisons across building types and developments through a common, measurable metric. Furthermore, this approach aligns with emerging best practices, with organisations such as LETI and the UK Green Building Council (UKGBC) increasingly advocating for EUI based standards, and it complements the GLA's carbon performance monitoring objectives.</p>
5.2 Heat networks	<p>The Council recognises that heat networks will play an increasingly important role in decarbonising heat supply, avoiding excessive reliance on the UK electricity grid supporting the transition away from gas boilers. The Council's Local Plan provides active support to district heat networks in Heat Network Priority Areas. To support exploration of heat network opportunities, the Council refers to the Mayor of London's Heat Map. The Council has itself not commissioned research to identify the opportunity for future heat networks but would be interested to work alongside the Mayor to consider how this policy approach could make it easier for individual Boroughs to offer guidance and evidence to support implementation. The new London Plan could potentially provide clear technical and legal frameworks for how such waste heat should be captured and transferred, and outline the roles and responsibilities of network developers and waste heat providers.</p>
5.3 Whole life-cycle carbon (WLC) and Circular Economy (CE)	<p>The Council would encourage the Mayor to ensure the new London Plan requires Whole Life-Cycle Carbon (WLC) assessments and Circular Economy (CE) statements for all major developments. London must address embodied carbon in materials and construction. The new London Plan should set clear carbon benchmarks and minimum quotas for reused and recycled materials.</p> <p>In particular, the Council would encourage the Mayor to consider:</p> <ul style="list-style-type: none"> • Setting benchmark targets or thresholds for embodied and whole life-cycle carbon that developments must meet or justify against. As councils often lack in-house expertise to verify WLCAs and CE statements. • Extending WLCA requirements to include major refurbishments and all demolition applications over a certain threshold. Reinforces the commitment to retrofitting. <p>Currently, the lack of enforceable Whole Life-Cycle Carbon (WLC) and Circular Economy (CE) targets creates uncertainty and inconsistency across London boroughs, particularly for Retrofits. To address this, the London Plan should introduce clear, phased targets for embodied carbon emissions, aligned with the LETI Climate Emergency Design Guide, which recommends benchmarks of less than 600 kgCO₂e/m² for non-domestic new builds and less than 500 kgCO₂e/m² for domestic new builds. A robust benchmarking framework should be embedded into planning policy, similar to the Greater London Authority's 'Be Seen' energy monitoring approach. This would allow applicants to demonstrate performance against set carbon thresholds</p>

	<p>Richmond Publication (Regulation 19) Local Plan policy 7 Waste and the Circular Economy includes Part C.1.a. with the requirement to ‘prioritise the reuse and retrofit of existing buildings wherever possible before considering the design of new buildings’.</p> <p>The Council strongly supports the ambition to embed circular economy principles more deeply into the Mayor’s strategic planning framework. As part of this circular economy requires not only strong policy direction but also the proactive provision of enabling infrastructure. To realise the full benefits of a circular economy, the London Plan must move beyond policy commitments and actively identify, support, and safeguard the physical infrastructure necessary for CE practices. The Council would encourage the Mayor to explore inclusion of a dedicated policy or strengthened sub-policy within the London Plan to identify and allocate land for key circular economy premises, including sites for the repair, refurbishment, and resale of materials and goods or permanent facilities that allow the storage, processing, and redistribution of surplus construction materials within boroughs if feasible.</p>
5.4 Waste	<p>The Council supports the GLA’s approach to committing to reducing waste and using resources more efficiently and the need to retain existing waste sites in waste use. Richmond’s new Climate & Nature Strategy sets out that the transition to a zero-waste and circular economy is an essential part of addressing the climate crisis. The Council promotes the circular economy principles and recognises that implementing the waste hierarchy is fundamental in reducing the amount of waste produced and ensuring that materials are reused, repaired and recycled. The Council supports the approach of using the Extended Producer Responsibility (EPR) scheme and the Deposit Return Scheme (DRS) as approaches in delivering this.</p> <p>Recognising that there are competing land uses within the Borough, the Council considers there is a need to prioritise ensuring existing waste sites are retained and optimised to ensure the Council’s waste responsibilities can be delivered for current and emerging waste streams. In order to achieve this, the Council considers that the definition of existing waste sites within the London Plan should be reviewed to ensure that sites that have historic waste uses that may have benefited from Certificates of Lawful Use are included and can continue to be used to support managing waste streams. The Council considers waste sites should only be released to other land-uses where waste processing capacity is re-provided at or above the same level as that lost elsewhere within London, to ensure that London achieves net self-sufficiency and future waste streams can be appropriately managed.</p> <p>With regards to the recycling of waste in residential properties, evidence shows that outer London boroughs e.g. Richmond-upon-Thames (41% in 2023/2024) achieve greater recycling rates than inner city boroughs. This is to some degree a reflection of the building typologies and space i.e. houses vs flats. Different targets and initiatives could target address specific challenges e.g. aimed at increasing recycling rates in flats / large developments and increased recycling of commercial waste.</p> <p>The first stage of the Waste Hierarchy is ‘prevention’, the second stage is ‘preparing for re-use’. The Council would encourage the Mayor to consider whether there is a role for the London Plan to provide guidance, targets and initiatives for reuse to work alongside the Government’s Extended Producer Responsibility (EPR) scheme and the Deposit Return Scheme (DRS) for packaging..</p> <p>Further guidance would be useful on the promotion of circular economy hubs.</p>
5.5 Green and open spaces	<p>The Council supports the emergence of the Local Nature Recovery Strategy (LNRS) and London Green Infrastructure Framework as useful tools for understanding the strategic role of London’s green and open spaces, and for providing a range of useful data and maps which aid implementation at the local level. The Council encourages this strategic approach to allow boroughs to prioritise where greening should be protected or enhanced and/or connected based on a local understanding of needs and opportunities. In this respect, the Council welcomes the strategic direction of exploring opportunities for rewilding and nature restoration but would encourage the Mayor to ensure the new London Plan is not overly prescriptive in a way that prevents locally responsive measures and strategies to be embedded into Local Plans.</p>
5.6 London’s open spaces	<p>Richmond Borough is home to a wide range of open spaces that are strategically important to Londoners, including Richmond and Bushy Parks and the Old Deer Park, the River Thames and the River Crane corridors, and other tributaries. The Council supports the principle of the London Plan recognising</p>

	<p>the indispensable nature of strategic green spaces and to safeguard, and where possible enhance, the multi-functional ways in which they contribute to London's vitality, including for residents, visitors and wildlife.</p> <p>The Council notes that the current London Plan only takes designated parks and larger open spaces into account when considering open space deficiencies at a strategic level. The Council supports the general principle of giving additional recognition to smaller green areas and linear spaces as part of understanding London's overall green infrastructure network, not least because these areas can provide valuable access to open spaces in areas where large green areas are limited, but also to enhance connectivity between sites. However, the Council would encourage the Mayor to ensure that any additional recognition given to smaller green areas is captured in a sufficiently strategic way by the London Plan and that detailed measures to plan for, manage and enhance these spaces, many of which will have a Borough or neighbourhood-level catchment, remains sufficiently localised and is predominantly addressed through Local Plans and wider Council strategies.</p> <p>Please see wider comments by the Council in relation to MOL and Green Belt in other parts of this response.</p>
5.7 Green infrastructure and biodiversity	<p>In relation to Biodiversity Net Gain, the Council would encourage the Mayor to support a London-wide decisive policy shift from “no net loss” to a mandatory BNG requirement above the 10% national requirements set out in schedule 14 of the Environment Act 2021 on developments. Several London councils have declared both climate and ecological emergencies, recognising the intertwined nature of these crises. Specifically, London Borough of Hammersmith & Fulham (H&F), Westminster City Council, Waltham Forest Council, Ealing Council, Tower Hamlets, and Camden Council have taken these steps. Hounslow Council and Barnet Council also declared a climate emergency, which is a crucial first step towards addressing the ecological crisis. .</p> <p>BNG offers a more rigorous and measurable approach than the Urban Greening Factor (UGF), as it quantifies the ecological value of habitats and ensures actual biodiversity improvements.). While UGF has helped incorporate greenery into urban design, it often prioritises aesthetic interventions over genuine ecological function. However there is significant merit in UGF and combined with BNG has the potential for vast improvements to London's Green Infrastructure. While the UGF has supported positive integration of greenery into urban design, it often lacks the ecological rigour necessary to halt or reverse biodiversity decline. When implemented together, UGF and BNG can deliver complementary benefits: UGF enhances immediate environmental quality and urban character, while BNG delivers long-term habitat value and ecological connectivity. The London Plan should therefore require robust biodiversity reporting, the use of BNG metrics from the earliest design stages, and a strategic focus on habitat creation and connectivity.</p> <p>The Council supports the UGF target set rather than a recommended target as set in the current adopted London Plan.</p>
5.8 Water	<p>The Council supports the Mayor's statement that London's waterways are vital assets, and to acknowledge the essential social, environment and economic benefits they bring.</p>
5.9 The strategic importance of London's waterways	<p>The Council broadly supports the direction of the London Plan in looking to increasing the emphasis on Local Plans improving water quality, as opposed to just considering it, and assessing ways in which the new London Plan could incorporate practical actions for enhancing water quality across London's waterways. In particular, the Council would encourage the Mayor to consider ways in which the London Plan can positively support the relationship between improving water quality, enhancing the vitality of rivers and other waterways and delivering net gains for aquatic biodiversity, particularly given that rivers and other waterways flow through Boroughs and therefore matters such as water quality and biodiversity can be both cross-boundary and strategic. The Council looks forward to working with the Mayor to consider the nature of such policies and to help inform how they can be implemented at development level.</p>

5.10 Flood risk management	<p>The Council supports the principle of the new London taking a more stringent approach to achieving Greenfield Runoff Rates (GRR), and welcome the principle of mandating an off site provision where GRR would not be met on site. The Council also support the use permeable materials where planning permission is required but are aware that much householder development, including for example the conversions of front gardens into a paved surfaces or other hard surfaces associated with houses can be legally undertaken under the Permitted Development Rights (PDR) (Class F of Part 1 of the Town and Country Planning (General Permitted Development) (England) Order 2015) and do not require planning permission, and that therefore local planning authorities lack the oversight necessary to mandate use of permeable materials in these cases.</p>
5.11 Water management	<p>The Council notes that the current London Plan promotes a catchment-based approach to water policy. The Council broadly supports the principle of a more strategic approach to water management in light of emerging and growing concerns about London's water availability and quality. In this context, the Council would welcome a renewed focus on water quality and catchment based approach from the new London Plan, and practical measures for Local Plans to take to incorporate this effectively</p>
5.12 Transport's role in London's growth	<p>In line with the Urban Design Study, which identified the capacity for growth within the borough, the Council encourages higher density development to be located in more sustainable locations, such as main centres, and areas better served by public transport and walking and cycling networks, subject to compatibility with established character. The Council support the emerging London Plan's approach towards minimising car use and addressing existing and new development impact on transport issues.</p> <p>The Council consider that development proposals should optimise site capacity through design-led approach, and local factors, such as the proximity to facilities, public transport routes, and the character of the surrounding area should be taken into account when reaching appropriate density of the site for housing and for other land-uses.</p> <p>The Council promote the use of initiatives outside of planning to target areas for both infrastructure improvements and community schemes, designed in partnership with Transport and Public Health. Interventions include improving local walking, cycling routes to schools, town centres, bus stops and local rail way stations, as well as encouraging car-free and low-car developments where they are located close to public transport stops/interchanges and where increased on-street parking stress can be mitigated. Additional softer measures such as school travel planning and promotion of cycle training to local residents are also encouraged. The Council also recognises the importance of smaller developments in supporting and building upon this local transport infrastructure, ensuring that new development is beneficial to all residents in the area.</p> <p>As an Outer London borough with limited local rail connectivity, the bus network plays a pivotal role in supporting low-car and car-free developments in Richmond. A strong commitment to further improve bus routes within Outer London is needed as this will play a major role in enabling these types of developments to be taken forward. Where they are deemed necessary to make a development acceptable in planning terms, financial contributions to improve the frequency of bus services will be sought from planning applications.</p> <p>There needs to be greater ambition to plan for the long-term transport infrastructure needed to bring about wider changes. Current plans and programmes only look to short and medium term funding solutions. A step-change in transport infrastructure and service is needed and justified to address transport inequalities and the climate emergency, and to support thriving communities. Longer-term thinking such as towards river crossings and orbital connectivity could unlock new opportunities. The Council support approaches towards enhancing strategic links and connectivity around key interchanges, as well as opportunities to develop and strengthen orbital routes that serves the increase in transport capacity and growth of the borough.</p> <p>The Council would also encourage the Mayor to consider the role the new London Plan can play in identifying and planning for the strategic infrastructure London requires for electric vehicles, including strategic EV charging infrastructure, to ensure that those making trips which simply cannot be made by alternative, more sustainable modes are at least appropriately incentivised to utilise electric vehicles.</p>

	<p>The Council has long opposed any plans to expand Heathrow, and in December 2024, refreshed its policy position on expansion. The Council does not consider airport expansion to be necessary to deliver London's growth, and there are questions around whether plans for a third runway previously developed by Heathrow would deliver value for money and wider growth.</p>
<p>5.13 Sustainable transport networks to support growth</p>	<p>To help people and places within London thrive, the Council recognise there is a need to transform the way we live and strengthen the connections we have between housing and transport. The Council strongly supports the role of the London Plan, and wider GLA initiatives, to deliver enhancements and improvements to local, orbital and suburban public and active travel infrastructure both in the context of new developments and to support the vitality of existing communities. These enhancements and improvements not only make development more sustainable, but lessens any negative impact on local areas, and makes local areas as a whole more vibrant and healthy. In a Richmond context, the Council would support the London Plan supporting a viable, orbital public transport solution, given known challenges to travelling north-south across west London. This would need to be supported by a clear understanding of traffic and the impact. The Council would support the Mayor working with Boroughs to bring forward assessments to identify opportunities in this area.</p> <p>The emerging Richmond Local Plan adopts a living locally concept (20 – minute neighbourhood) which seeks to create an environment that make it easier to be physically active, enhance opportunities for walking and cycling safely, creates high quality public spaces and public realms, and improves connectivity and accessibility for all that can improve not only the quality of life for the local population by brings about multiple benefits of healthier lifestyles, cleaner air, stronger local economies and better resilience to climate change. The Council therefore supports the approach of strengthening the link between transport and housing at borough level and consider that this link can be addressed within individual Local Plans as well as supportive documents such as the Local Implementation Plans and planning obligations/CIL charges.</p> <p>The Council has adopted an Active Travel Strategy that includes clear ambitions for a strategic cycle network across the borough and have integrated the Healthy Streets Approach into the design of highway schemes. The Council supports the link between growth and the development of local walking and cycling networks.</p> <p>The Council consider that key to supporting this work is ensuring that neighbouring boroughs fulfil their duty to cooperate for strategic cross-boundary issues relating to housing and transport.</p>
<p>5.14 Car parking, cycle parking and deliveries</p>	<p>The Council have adopted an Active Travel Strategy which aims to enhance walking and cycling infrastructure, reduce carbon emissions, and improve public health in line with the Local Implementation Plan. The Council, therefore, strongly supports approaches within the London Plan that align with this strategy, encourage the adoption of sustainable transport options, and enhance walking and cycling networks across London.</p> <p>It is recognised, however, that within the borough there are high levels of car ownership and use within fairly dense developed residential areas, and sufficient parking and servicing is required to meet the essential needs of the borough. All development proposals that come forward are assessed on a case-by-case basis to see where car-lite and/or car-free schemes can be encouraged and promotion of alternative solutions such as car clubs can be included. Whilst the Council supports the approach towards reducing the reliance on vehicles, however, a balanced approach needs to be attained between providing essential parking provision for local residents whilst also strengthening active travel infrastructure and supporting behavioural change towards active and public travel solutions. The Council therefore considers that car parking standards that come forward in the new London Plan should allow for local context to be considered and be supported by updated connectivity metrics that truly reflect accessibility and travel options for Londoners.</p> <p>The London Borough of Richmond has consistently had the highest rates of cycling in any borough in Outer London. The Council are committed to maintaining the provision of appropriate cycling infrastructure to facilitate the active travel strategy and encourage the take up of cycling amongst local residents. The Council recommend that the London Plan continues to stipulate minimum cycle parking standards to support the ambitions of active travel and ensure cycling corridors are promoted.</p> <p>Regarding maximum vehicular parking standards, the Council recommends that the new London Plan should make it clearer to planning applicants that they need to provide all of their required disabled parking for residents off-street where possible, and that on-street bays in a CPZ will only be reallocated in exceptional circumstances. In addition, the Council note that the current London Plan recommends that all M4(3) and M4(2) dwellings in a development should have up to one</p>

	<p>disabled space each over the lifetime of the development. The Council recommend that this reviewed to ensure that it is achievable, and that where developments are in very close proximity to accessible public transport (such as bus stops) that these are explored as alternative option.</p> <p>Transport technology has moved at a rapid pace and the need for appropriate parking and storing facilities of e-scooters, e-cycles and dockless cycle hire and cargo cycles as well as electric vehicle charging points is increasing. The Council, therefore, support approaches in the London Plan to maintain and strengthening the provision of these transport options and their associated facilities in appropriate locations.</p>
5.15 Responding to transport trends and new technologies	<p>The Council are committed to creating an enhanced transport environment and looking at more sustainable transport options that allow residents to live locally. The Council have responded to changes in transport technology by providing routes and facilities that can be used for e-bike, e-scooters and e-cargo across the borough. The Council, therefore, support policy approaches within the new London Plan that encourage the use of transport technology to achieve this where appropriate to do so.</p> <p>The Council would also support regional approaches at exploring opportunities in delivering a network of infrastructure that supports the use of hydrogen buses as a sustainable mode of public transport.</p> <p>The Council recognise that ‘advanced air mobility’ is emerging technology that could align with the sustainability goals of improved air quality, and less congestion on the roads within the borough, however the Council are clear this should not come at the expense of impacts to local residents in terms of noise, safety and privacy. The Council considers further evidence is required to demonstrate if advanced air mobility is a safe and viable transport approach within London and the borough and that it would not conflict with existing land-uses, land designations, the local environment, and strategic infrastructure (for example local airports including Heathrow).</p>
5.16 Fire safety	<p>The Council notes that since the current London Plan was published, there have been changes to Building Regulations on fire safety, including in relation to higher-risk buildings over 18 metres or seven storeys.</p> <p>The Council supports the Mayor’s suggested approach to remove overlapping, confusing and duplicative planning policy and building regulations. This would ensure that fire safety is appropriately considered by those qualified to assess compliance with the relevant regulations and avoid the implication that the local planning authority should be involved in assessing fire safety where the relevant specialism actually lies within the Building Regulations industry. The Council also welcomes any approach to make it clearer when fire safety policies are to be applied and support the Mayor’s suggestion that it ought to primarily relate to major developments where people sleep on the premises.</p>
5.17 Air quality	<p>The London Plan is vital to the Air Quality agenda as it helps set standards and goals for development and enables officers to have meaningful and productive conversations and set standards to promote cleaner air both during construction and throughout occupancy and use, as well as protecting sensitive receptors and helping drive down pollution in key areas.</p> <p>The Council welcomes the commitment to the World Health Organizations objectives for air pollution; however the Council suggests this commitment needs to determine firm objective levels. Many London Borough’s new Air Quality Action Plans are making firm commitments, and to support those boroughs, the Mayor should ensure the London Plan is in alignment.</p> <p>Richmond Council have aligned with the EU objectives and have adopted a target of 20 µg/m³. The Council understands the benefits of cleaner air, but as pollution does not respect boundaries and London has a complex air quality picture, it is important that the same degree of commitment is set across London.</p>

	<p>The proposals for the new London Plan signal growing expectations on air quality in development however it will need to offer clearer guidance and incentives to help developers deliver responsibly.</p> <p>The construction fleet in London is already the world's cleanest thanks to the Mayor's Low Emission Zone for Construction (NRMM). However, the Industry wishes to go further and decarbonise, since battery alternatives to diesel are often not feasible. Construction will often require off-grid supply. Power management considerations need to form part of the planning process, there are current case studies that show carbon, toxic emissions and fossil use can be significantly reduced, alongside cost savings, which can all be made if careful consideration is given early on and conditioned in the planning process.</p>
5.18 Heat risk	<p>The Council supports the principle of the London Plan taking a positive approach to reducing overheating risk in buildings. The Council agrees with the London Plan approach to promoting design measures, such as canopy cover and use of appropriate materials, and strengthening the requirements for development proposals relating to overheating of buildings.</p>
5.19 Healthy communities	<p>The Council reflects London Plan Policy E9 within its Local Plan. The Council would encourage the Mayor to ensure the new London Plan takes an ambitious and clear approach to how development must respond to the need to deliver healthy and safe communities and to ensure that any drive to streamline the London Plan or reflect challenging market conditions does not result in a loss of ambition in this area.</p> <p>As a specific concern, the Council notes that the NPPF deviates from the London Plan by stating that local planning authorities should refuse applications for hot food takeaways and fast-food outlets that are near where children congregate <u>unless in a designated town centre</u>. In built up urban areas such as London, it is quite possible and even probable that applications for new takeaways within 400 metres of a school are located in a town centre and thus the additional text within the NPPF has the potential to weaken an important policy tool for combatting childhood obesity. The Council would encourage the Mayor to maintain the stricter approach within the London Plan and clearly set out why direct application of the NPPF clause is inappropriate within London.</p>