

Key actions arising from hearings – Week 1 (update provided to Inspectors 28.06.2024)

Please find detailed below the Council’s record of actions/proposed changes arising from discussions during hearing sessions in week 1. Where proposed changes are set out below it is intended that the Council will update and publish a Schedule of Modifications in due course, using a prefix EH to identify they have arisen from discussions during hearing sessions. These will be for the Inspectors to consider, and inform a future Main Modifications public consultation.

Hearing 1 (25/06/2024) - Opening statements, legal requirements and overarching issues (MM1) and Spatial Strategy (MM2)

- The Council’s Opening Statement was added to the examination library ([LBR-003](#)).
- The Council (Joanne Capper) to contact resident who is concerned about the proposed modification in the Council’s Statement of Common Ground with the Environment Agency relating to the definition of the functional floodplain. It was noted that any modifications taken forward by the Inspectors will be subject to a future Main Modifications public consultation.
- The minor updates to the Habitats Regulation Assessment Report ([SD-004](#)) will be shared with Natural England and in due course an update added to the Examination Library; an updated HRA Report will be published alongside a future Main Modifications public consultation.
- The Council advised that during Main Matter 3 they are intending to circulate a brief note to update on the stepped trajectory for housing delivery in relation to Policy 10.
- A number of suggested modifications were discussed, these are set out below.

The following changes are proposed by the Council:

Change ref.	Policy section or heading	Page/ paragraph	Proposed change	Reason for change
Legal requirements and overarching issues				
TBC	Title page and introduction	1 and 5	Amend title page and add a paragraph in the introduction to make reference to the plan as the <u>Richmond upon Thames Local Plan</u> Richmond Local Plan as follows: On page 1: Richmond upon Thames Local Plan ‘The best for our borough’ On page 5: add text following paragraph 2.1: ... This is the plan for the borough of Richmond upon Thames. All	Further to discussions in Hearing 1, to be clear the Local Plan covers the borough of Richmond upon Thames not solely the town of Richmond.

			subsequent references to the abbreviated 'Richmond Local Plan' refer to this boroughwide plan.	
TBC	Policy 2 Spatial Strategy: Managing Change in the borough (Strategic Policy)	23	<p>Add amendments to clarify the plan period in the first part of Policy 2 to reference that the plan period runs to 2039:</p> <p>The spatial strategy for Richmond upon Thames is for the plan period 2024 to 2039. The overarching aim is to ensure that growth is delivered in a sustainable way...</p> <p>Consider mentioning this change on the title page when the front cover is produced at adoption.</p>	Further to discussions in Hearing 1, to allow the plan period to be accurately represented in the plan for clarity.
Spatial Strategy				
TBC	Places/ Spatial Strategy	27/5.2 29, 45, 60, 98, 110, 121, 144, 162, 179	<p>Add policy references for each Place-based policy in the Local Plan:</p> <p>Policy PBS1 Hampton & Hampton Hill</p>	Further to discussions in Hearing 1, to reflect that the Place-based strategies are Policies with a specific policy reference for greater clarity.
TBC (to supersede P1.2)	Policy 1 Living Locally and the 20-minute neighbourhood	20/4.8	<p>Amendment to the wording of the Council's suggested modification P1.2 (as originally set out in LBR-002) to add reference to the Mayor's Vision Zero Strategy for road safety (as originally set out in the Statement of Common Ground with TfL SOCCG-03) but ensure other strategies are not placing additional burdens on development:</p> <p>The 'living locally' concept relies on inclusive and attractive high streets and public spaces, promoting and encouraging walking, cycling and accessibility for all; this complements the Mayor's Healthy Streets approach as set out in TP2 Policy T2 of the London Plan. It should also seek to reflect the Mayor's Vision Zero which seeks aims to reduce road danger and create a safer transport environment for all.</p>	Further to discussions in Hearing 1, to ensure that other strategies will not limit housing delivery.

Hearing 2 (26/06/2024) - Delivering new homes and an affordable borough for all (MM3), Hampton and Hampton Hill (MM4) and Teddington and Hampton Wick (MM5)

- The Council provided an additional note confirming the methodology and approach to the stepped trajectory for further clarity at Hearing 2 as referred to in Hearing 1 (attached to this document as Appendix 1 is the contents of the document tabled in hard copy for all participants in MM3). The Council will suggest a modification in due course to add details setting out the stepped trajectory into Policy 10.
- The Council participated in an additional technical policy discussion with the GLA, during Hearing 2, to discuss appropriate amendments to Policy 11 regarding affordable housing and the London Plan fast-track approach to viability, which was identified as a general conformity issue. The Council will work through their evidence base and produce a note in relation to affordable housing to justify their position on the affordable housing target included within the policy 11, which the GLA considers is a non conformity issue with the London Plan. The GLA confirmed they were content to take any additional evidence to the Mayor for further comment and review their position if justified.
- The Council will take part in an additional session during the reserve days to resolve issues relating to MM3 and affordable housing with the GLA and other representors if necessary. The Hearings Programme will be updated if this is proposed by the Inspectors, and the Programme Officer will notify the relevant representors.
- The Council offered to add to the Examination Library the Housing Delivery Test Action Plan (as referred to in the Council's Written Statement on Main Matter 3), as this has now been agreed by the Council's Environment, Sustainability, Culture and Sports Committee on 12 June 2024; this will be added as a Post Submission Examination Document in due course.
- The Council offered to add to the Examination Library the Affordable Housing Update Report, as this was considered at the Council's Adult Social Services, Health and Housing Committee on 18 June (this is an annual update, to the previous report SD-096); will be added as a Post Submission Examination Document in due course.
- Discussions in Hearing 2 raised the need for clarity in presenting the projected housing delivery in line with the Place-based Strategies of the Plan. The Council will consider amendments to Table 17.1 in Policy 10 or whether there is an opportunity to provide greater clarity to delivery of the Plan, along with indicative housing delivery or estimated floor space capacity, in specific relation to place-based areas and site allocations.

Hearing 3 (27/06/2024) - Twickenham, Strawberry Hill & St Margarets (MM6), Whitton & Heathfield (MM7) and Ham, Petersham & Richmond Park (MM8)

- The Council will update further on Telephone Exchanges in regard to ownership and industry changes to provide further clarity on Telephone Exchange Site Allocations.
- Suggested modifications were discussed in relation to Site Allocation 22 Whitton Community Centre (in addition to modifications suggested by the Council in [LBR-002](#) including factual corrections - PBSW&H.1, SA22.1, SA22.2), as set out below.

The following changes are proposed by the Council:

Change ref.	Policy section or heading	Page/ paragraph	Proposed change	Reason for change
Place-based Strategy Whitton & Heathfield				
TBC	Site Allocation 22 Whitton Community Centre, Percy Road, Whitton	109	Amend first sentence in 'Description of Current Site Character' box to delete text: 'Whitton Community Centre is a part single, part two -storey standalone building accessed from the south side of Percy Road, with a car park to the front of the property.'	Further to discussions in Hearing 3, to correct an inaccuracy,
TBC	Site Allocation 22 Whitton Community Centre, Percy Road, Whitton	110	Amend first bullet to add additional text: <ul style="list-style-type: none"> • Given the importance of the community use and the services it provides, any redevelopment of the site would need to ensure the adequate reprovision of this use. Local Plan Policy 49 Social and Community Infrastructure proposes that should a scheme come forward for redevelopment or change of use to 100% genuinely affordable housing, in accordance with Policy 11 Affordable Housing in terms of mix, tenure and affordability, then it would not need to be 	Further to discussions in Hearing 3, to reflect the importance of community uses at Whitton Community Centre and clarify the circumstances in which an affordable housing scheme could be considered.

			considered for alternative social infrastructure use nor marketing evidence submitted. In those circumstances, a wholly affordable housing scheme would be supported. However, on this site the Council is seeking affordable housing with community/social infrastructure, due to the need to reprovide the existing use.	
TBC	Site Allocation 22 Whitton Community Centre, Percy Road, Whitton	110	Amend second bullet: <ul style="list-style-type: none"> It is recognised that there is a range of social and community uses in operation in the immediate area. Redevelopment of the site should explore opportunities for complementary and greater joined-up services with neighbouring uses. 	Further to discussions in Hearing 3, to add clarity.

Appendix 1 – Richmond Housing Trajectory (as tabled in hard copy during Hearing 2)

Richmond Housing Trajectory

	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39
Past completions	164	141	101															
Projected completions				238	407	553	738	1192	845	324	461	399	361	306	306	306	306	306
Stepped Trajectory	210	210	210	210	420	420	420	670	670	670	306	306	306	306	306	306	306	306

Key

	Local Plan period
	London Plan period

London Plan Target 4,110

Local Plan Housing requirement (2024-2039) 5,928

Local Plan period housing requirement plus London Plan housing requirement 6,558

The Housing Trajectory above includes information from the draft Authority Monitoring Report (2023/24) and sets out the Councils stepped trajectory which would apply to the London Plan housing target between 2021-2031, this approach is accepted within the London Plan. The Council have set out a stepped housing trajectory including the following annual housing requirements and the Council would seek to include these set formerly within policy 10:

- 210 dwellings per annum between 2021/22-2024/25
- 420 dwellings per annum between 2025/26-2027/28
- 670 dwellings per annum between 2028/29-2030/31

Totalling the 10 year London Plan housing requirement of 4,110 dwellings between 2021-2031.

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The requirement per annum following 2031 is 306 dwellings per annum based on the London Plan 2017 SHLAA requirement, which also considers capacity within the borough. The 306 dwellings per annum is based on the large site capacity within phase four and five within Table 10.1 in the 2017 SHLAA. Large site capacity in Phase four (2029/30 to 2033/24 (5 years)) of 701 units and in Phase five (2034/35 to 2040/41 (7 years)) of 164 units, a total of 865 units in this 12 year period, on average 72 units per annum. Taken with the small sites delivery of 234 homes per annum as included within policy H2, gives 306 homes per annum.

Adding the London Plan requirement from 2021-31 and SHLAA 2017 housing requirement from 2031-2039, this results in a total housing requirement of **6,558 dwellings**, for the London Plan housing target period and Local Plan period.

Based on the information above in relation to the Councils pipeline, plus completions within the first 3 years of the London Plan housing target period, this includes:

A pipeline of **7,454** dwellings (this includes the completions within 2021/22-2023/24 - the first 3 years of the London Plan housing target period). Resulting in a buffer of 13.6% over the Local Plan period plus London Plan Housing Target period.

In relation to the 5year housing land supply this results in the following calculation:

Row	5 year Supply Calculation	Dwellings			
A	5 year housing requirement	2140			
B	Deficit (London Plan period 2021/22 -2023/24)	224			
C	Total requirement	2364			
D	5 year supply	3128		Annual Requirements plus buffer (Dwellings)	
E	5% buffer	107	G	494	= (C + E)/5
				Yrs	
F	Supply (yrs) with 5% buffer			6.3	

This shows the Council is able to deliver the Local Plan housing requirement plus the housing requirement following the London Plan housing requirement with a sufficient buffer, well over the 5% required as per the NPPF.