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Planning Policy Consultation Team,
Planning Directorate – Planning Policy Division,
Ministry of Housing, Communities and Local
Government,
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Date: 9 March 2026

Sent by Email

Dear Sir or Madam

Consultation on National Planning Policy Framework (NPPF) – March 2026

On behalf of the London Borough of Richmond upon Thames, I am pleased to present you with our response to the Government's consultation on a revised National Planning Policy Framework (NPPF).

We understand the Government sees reform of the planning system as a way of tackling the country's housing crisis. We also recognise there are ways in which the planning system can be improved to ensure that Boroughs are encouraged to bring forward effective and justified local plans that command local support. Local plans are vital for setting appropriate strategies for addressing issues of national priority within a local context, including unlocking and accelerating housing delivery (with a particular emphasis on affordable housing) and economic growth. We have previously responded to a number of the Government's consultations on proposed changes to the planning system, including the package of major reforms to local plan-making, making it clear that we support the principle of reforms provided that the system remains plan-led and allows for the proper and effective functioning of the local democratic process and meaningful community involvement. In this context, the Council is clear that national planning policy should serve two primary functions: to set general priorities and requirements for local plans to address, and to provide a framework for decision-making where those local plans are not adequately meeting those requirements.

The Council's detailed responses to the consultation are aimed at ensuring that the new NPPF meets those two primary functions and avoids taking on a wider function that is harmful to the plan-led system, local democratic process and community confidence in planning. The Council is concerned that, as currently proposed, the new NPPF actively seeks to undermine or displace local plans irrespective of how up to date they are, how well they are performing or how justified they are by evidence. In Richmond's case, our Local Plan was only adopted late last year after years of meaningful community and stakeholder

involvement and investment of Council resource, yet in a number of places is now proposed to carry limited weight.

I have enclosed the Council's full responses to the consultation which I hope will be helpful in meaningfully improving the effectiveness and clarity of individual policies and proposals within the proposed NPPF. However, I do wish to bring your attention to a number of key points below which we elaborate on in our full responses.

Firstly, we support the Government's decision to keep the NPPF non-statutory. We consider it vital that local plan policies, which are an expression of local priorities and nuance and which reflect years of meaningful evidence gathering and community involvement, remain the starting point for decision-making.

We are, however, deeply concerned over the proposal that local plan policies that are inconsistent in any way with the new NPPF will be given limited weight. The terminology used is not well defined and the inclusion of the words "in any way" will naturally lead to severe interpretations that local policies that are simply expressed differently, or contain additional, but otherwise justified, criteria should be given limited weight. Whilst the Council considers that this proposal is inconsistent with the legal framework for decision-making, and the wider operation of the plan-led system, if retained, this wording should at the very least be better clarified. The wording should make it clear that it is only where there is material disagreement or tension in how a specific policy requirement should be applied that the NPPF's advice on weighting would prevail and, even then, only in relation to that specific policy requirement and not necessarily to a policy as a whole.

With respect to development within settlements, the Council considers that the proposal that this will now be subject to a permanent presumption in favour of sustainable development risks further undermining the plan-led system. The notion that a Council with an up-to-date Local Plan, that is meeting local housing targets should nevertheless be compelled to support speculative poor quality developments that do not relate well to the vision or spatial strategy of their Local Plan, unless they can demonstrate that the harms would "substantially outweigh" the benefits removes many of the key incentives of producing a Local Plan for an urban Borough. A permanent presumption actively invites a race to the bottom in terms of quality from developers who will see this national policy as an opportunity to bring forward schemes that are essentially simply "not bad enough to refuse". The Council also notes with concern that the NPPF curiously only directs refusal on a very limited number of topics which does not include, for example, developments generating unsafe levels of air or other pollution.

Whilst we support some of the rationale for streamlining local plans and preventing local plans from repeating national policy, we remain concerned, as we expressed in our response to your previous consultation on proposed planning reforms, with the proposed restrictions on the ability to modify or depart from national policies in a local plan. It is not possible, nor desirable, for the NPPF to seek to address all planning issues comprehensively or even to reflect all scenarios which impact on how national planning issues manifest locally. This creates a clear and sensible role for local plans to interpret national policy in a local context. Automatic restrictions on their ability to do so will lead to gaps in policy

coverage or excessive reliance on poorly fitting or vague national policies which do not adequately address local issues, both of which will lead to inconsistent or poorer quality decision-making. This restriction should be loosened and greater trust should be given to the examination process for assessing the evidential justification for local plan policies.

We also have a number of concerns around the proposed limits on local plans' ability to set quantifiable development standards beyond a defined range of topics. For one, the list of topics does not include economic development or arts and culture standards, which for Richmond, and other London Boroughs, have helped support the meaningful delivery of affordable and other forms of space and contributions towards local employment and skills. These standards have been examined and found to be sound under successive development plans and are vital for ensuring the delivery of affordable space and local employment opportunities in a part of the country where competition for land and affordability issues are particularly acute. Given these standards are justified and sound, their omission from the list of acceptable topics creates unjustified tension and needs to be rectified.

Like the above, we also note with concern that the Government are seeking to limit local authorities' ability to set energy efficiency standards above Building Regulations. The Council, and indeed most London Boroughs, have had effective policies in place for a number of years which ensure new buildings are built to as close to a net zero carbon standard as possible, consistent with national, regional and local climate change objectives. These policies are now routinely factored into land values and are therefore demonstrably not viability burdens. By removing authorities' ability to apply these standards, the Government is imposing an unnecessary backwards step that is inconsistent with climate change ambitions, particularly as homes built to Building Regulations or the Future Homes standard are only projected to be net zero from 2030 or 2035 as the grid decarbonises. If imposed in London, this restriction will generate a completely unnecessary future retrofitting burden and will not materially improve development viability, with the savings for developers simply serving to reinflate land values.

The Council notes that the Government is seeking to introduce a new medium site category of between 10 and 49 units, or up to 2.5 hectares, to support SME developers. The Council supports proportionate measures to support SME housing delivery but has serious concerns regarding the proposal to allow affordable housing from medium sites to be automatically made through a financial payment. Whilst the Council notes that some RPs are unlikely to take on affordable units below a certain size threshold, this is not the case in all scenarios and local planning policies already allow for pragmatic decisions to be made where this can be evidenced. In a borough like Richmond, with relatively few strategic sites, this change would have a significant and disproportionate impact on delivery of on-site affordable housing which will undermine the creation of mixed and balanced communities and offload the responsibility and administrative costs for delivery onto local authorities, who do not necessarily have the capacity or land with which to effectively spend financial contributions. If the Government is serious about optimising the delivery of affordable housing through the planning system, it is vital that financial contributions remain a last resort for affordable housing delivery and require clear evidence by a developer.

The Council has previously made a series of representations regarding changes to national Green Belt policy, which remain a matter of local concern. The Council notes that in this version of the NPPF, the Government is proposing to further liberalise development on Green Belt land within walking distance of certain railway stations and to remove footnote 7 restrictions from grey belt land which appears to water down the significance of these fundamentally important designations. The Council is very concerned that this generates further unhelpful uncertainty and speculation about the relative weighting of Green Belt policy and other planning designations and serves to further undermine the clear and important role that Local Plans should play in identifying the circumstances in which any exceptional Green Belt development should be permitted. The Council has made a number of detailed comments about these further changes.

Alongside the above points, the Council has prepared comprehensive comments against the questions set out in the consultation which accompany this letter. As above, these have been developed with the intention of understanding the underlying objectives of the changes and therefore suggesting meaningful improvements that are consistent with those objectives wherever possible. We would be very happy to meet with you, or your teams, to clarify or elaborate on any points set out in our response.

Yours faithfully

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