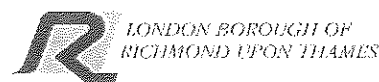


Environment and Community Services Directorate  
Robert Angus  
Head of Development Management (Richmond)  
Phone: 020 8891 7117  
Email: R.Angus@richmond.gov.uk



The Planning Inspectorate  
Quality Assurance Unit  
4D Hawk Wing  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

13 December 2016

Dear Sir/Madam,

**London Borough of Richmond upon Thames – consideration of affordable housing contributions from small sites in appeal decisions**

The Council is concerned by recent decisions which reveal an inconsistency in the weight that is applied to the Written Ministerial Statement (WMS) and local circumstances. We are aware that other local planning authorities are also experiencing similarly inconsistent decisions.

The Council has received the following decisions which consider the WMS as a material consideration and attach great weight to the WMS, but that this does not outweigh the significant and substantial weight attached to local evidence, hence the appeals have been found in the Council's favour:

Appeal Ref: APP/L5810/W/16/3142005  
267 Sandycombe Road, Richmond upon Thames TW9 3LU  
Decision date: 31 August 2016  
Appeal dismissed

Appeal Ref: APP/L5810/W/16/3155064  
24 The Causeway, Teddington, Middlesex, TW11 0HE.  
Decision date: 18 November 2016  
Appeal dismissed

Appeal Ref: APP/L5810/W/16/3151789  
27 Grove Terrace, Teddington, Richmond Upon Thames, TW11 8AU  
Decision date: 18 November 2016  
Appeal allowed (with an affordable housing contribution)

However, the Council has also received numerous appeal decisions taking the opposite approach, and in particular two awards of costs have been made against the Council with regard to this issue:

Costs application in relation to Appeal Ref: APP/L5810/W/16/3148614  
11 Tayben Avenue, Twickenham, Richmond upon Thames TW2 7RA  
Decision date: 18 August 2016

Costs application in relation to Appeal Ref: APP/L5810/W/16/3156689  
Lower Ground Floor, 57 Church Road, Richmond TW10 6LX  
Decision date: 2 December 2016

It is particularly unhelpful for all parties having decisions going either way with no obvious rationale. The Council is particularly aggrieved that there does not appear to be any logic as to when an Inspector decides that the WMS does outweigh / or does not outweigh the significant and substantial local evidence of affordable housing need, along with the Council's evidence that small sites make a significant contribution to housing supply and that the completion rate from large sites is low. All of these appeal decisions have been based upon very similar information submitted to PINS when dealing with an appeal that affects affordable housing. Although the decisions relate to different districts within the Council's area there are no material differences in the planning considerations that apply to all of them.

I look forward to your response on this matter.

Yours sincerely



---

Paul Chadwick  
Director of Environment and Community Services

cc

- Sarah Richards, Chief Executive, Planning Inspectorate
- Steve Quartermain, Chief Planner, Department for Communities and Local Government
- National Planning Casework Unit
- Gavin Barwell, Minister of State for Housing, Planning and Minister for London at the Department for Communities and Local Government