

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

Date: 20th June 2025

Mayor of London City Hall Kamal Chunchie Way London E16 1ZE

Dear Sir Sadiq

London Borough of Richmond upon Thames Response to 'Towards a New London Plan'

On behalf of the London Borough of Richmond upon Thames, I am pleased to present you with our response to the 'Towards a New London Plan' consultation in which you seek views on matters concerning the development of a new London Plan.

We fully support the principle that now is the right time to be preparing a new London Plan to help guide and shape our city's development in the years ahead. We recognise that there are a number of significant challenges and opportunities that create an imperative for a new, ambitious policy framework for London, including critical issues of housing affordability, sustainability and climate change, and of harnessing economic opportunity.

The new London Plan presents an opportunity to drive up the delivery of housing across London in light of the acute issues of affordability you correctly identify within the consultation document. Our own Local Plan, currently at Examination, sets out our positive approach and commitment to delivering new homes, including genuinely affordable homes, on site allocations, infill and small sites, and our approach to resisting losses in our existing dwelling stock. As set out in our response to your consultation, we recognise that sustainability and good growth depend on striking the right balance between land uses, and ensuring that the policy framework that we, together, put in place delivers for our communities.

Whilst we note your commitment that the new London Plan will not raise the overall burden on development, we would encourage you to ensure that the delivery of more housing across London is not slickened by an erosion of standards, but rather a renewed focus on unlocking the types of development that our communities need in the most sustainable way, with full regard to local infrastructure and environmental needs. In Richmond, whilst our Local Plan has a positive strategy for delivering new housing, the Borough's limited land supply and many important environmental and heritage designations makes it even more

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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 and health facilities and enable "living locally", and the overall need to achieve a balance between housing and economic growth, to deliver the good and sustainable growth envisaged.

We note that the new London Plan will need to consider ways in which London's overall housing needs can be met. 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. We recognise that you are progressing a review of London's Green Belt as one mechanism to help meet London's housing needs. As set out in our response, it is vital that any exploration of Green Belt land is informed by significant collaboration with individual Boroughs and 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 which can serve a range of important functions for local communities, wildlife and mitigating the impacts of climate change, particularly 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. This also creates a need to look beyond Greater London's immediate boundaries at more strategic opportunities to help meet London's housing needs. where the conditions may be more suitable to delivering sustainable communities.

To make London a net zero carbon city by 2030 requires the new London Plan to play an active role in creating more sustainable, resilient places, and push for higher sustainability standards in development, to address the climate emergency and biodiversity crisis. From cleaner air to greener spaces, from lower energy bills to green jobs and a zero-waste economy, the positive impacts of climate action are far-reaching and will benefit all Londoners. We would encourage you to ensure the new London Plan is ambitious in this regard.

We also fully support the integration of the London Plan with the recently published London Growth Plan. The London Growth Plan sets out an exciting vision for the future economy of London and we fully support the contribution that Boroughs like Richmond, and across wider South London, can make to realising the vision. This month, South London Partnership has published Big Ambition: South London Growth which sets out our focus for driving South London's economy forward. We support the recognition that realising London's potential will require investment in infrastructure – including better transport and stronger digital connectivity – so our businesses, workers and communities can fully benefit from economic growth. In this respect, it is right that the new London Plan sets the blueprint for how London's future economy should operate, and in particular to lay the foundations for the investment required in the economic infrastructure required to make this happen. As an example, the Council would welcome further investment in local orbital transport

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infrastructure, including public and active travel, that serves to connect local communities, businesses and jobs in ways that are more integrated than the traditional radial routes.

We are keen to work with you and your officers as the London Plan progresses and as more detailed policy options and choices emerge. In particular, we are keen to offer our local insights and evidence to ensure that the new London Plan sets appropriately ambitious, long-term strategies for the issues that matter most to our local communities, including housing, jobs, sustainability, infrastructure and the wider environment, that then facilitate the development of locally-responsive, community-shaped policies in Local Plans. In this respect, we hope that you find our full response to the matters included in the consultation document useful when developing these further policy options, and if we can be of any assistance in clarifying or elaborating on any of these detailed responses, please do not hesitate to contact us.

Yours Sincerely,

CIIr Julia Neden-Watts

Deputy Leader and Chair of the Environment, Sustainability, Culture and Sports Committee

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