



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

Sadiq Khan, Mayor of London

Date: 22 January 2026

**Obo The Planning Team, Greater London
Authority, City Hall,
Kamal Chunchie Way, LONDON, E16 1ZE**

Sent via email

Dear Mr Khan,

**CONSULTATION ON SUPPORT FOR HOUSEBUILDING DRAFT LONDON PLAN
GUIDANCE**

The London Borough of Richmond upon Thames (hereafter referred to as 'The Council') are pleased to present you with our response to your consultation which seeks views on the GLA's draft London Plan Guidance which we understand includes three distinct measures – alterations to cycle standards, alterations to housing standards and a new planning route.

The Council recognises that housebuilding in London is experiencing a period of challenge, characterised by build cost inflation, difficulties in the sale of market housing, high interest rates and delays with the Building Safety Regulator. The Council wishes to emphasise that it would support the principle of well-targeted, proportionate and effective measures to support the delivery of the right types of housing in the right locations.

The Council itself is playing its part in delivering growth, in a sustainable way, focussed on the types of growth that our local communities need. Richmond, as a Borough, is relatively constrained, with over two-thirds of our land area covered by national and international environmental designations. Nevertheless, through our recently adopted [Richmond Local Plan \(2025\)](#), the Council is committed to delivering significant levels of growth, alongside vital community infrastructure.

The Council has also prepared a [Housing Delivery Test Action Plan](#) which includes detailed analysis of the root causes of current housing delivery challenges and identifies a range of positive actions the Council is taking to increase housing delivery. This includes securing Registered Provider status to enable the Council to directly deliver more affordable housing, exploring opportunities to increase Housing Capital Funding to incentivise housing delivery (having already committed £12.4m over the next five years) and working with partners

across the development industry to understand both site-specific and more general challenges affecting delivery and working to address these challenges from an early stage.

New Affordable Housing Planning Route

The Council has a particularly significant and urgent need for affordable housing, particularly social rented housing. The Council's Housing Needs Assessment¹ (2023) identifies an unconstrained need for 1,123 affordable rented homes per annum across the borough, and an additional need for 284 affordable homes per annum for affordable home ownership. Compared to the Borough's capacity-constrained housing target of 411 homes per annum, these unconstrained figures represent an extremely acute affordable housing need. In short, the Borough's unconstrained need for affordable housing exceeds, by over three times, the overall number of all homes it expects to be built each year. Similarly, nearly 4,000 households are currently on a Council housing waiting list, of which over 400 are homeless, and many others are living in inadequate or overcrowded conditions. You will note there is a wide range of research identifying the socioeconomic imperative for properly planning for national and local social housing needs.

Given that the Borough is fairly constrained and has fairly few strategic sites, the ability to maximise affordable housing delivery on each site, subject to viability, is crucial to maintaining a supply of affordable housing to meet needs. In Richmond, each site subject to a lesser affordable housing requirement has a disproportionately significant impact on overall supply compared to many other London Boroughs.

Because of this, the Council wishes to express its significant concerns that the new route – which effectively lowers the existing 35% affordable housing requirement to 20%, and alters the tenure split of 70:30 in favour of social rented housing to 60:40 – will undermine the efforts of the Council and its partners to deliver more affordable housing in Richmond.

It is a matter of particular concern that the new route is not proposed to involve any viability or wider means testing which means that it will be available for developers where there is reasonable evidence (including, in some cases, recent permissions or full viability assessments) that they could viably provide more affordable housing on-site.

The proposed new planning route also seeks to displace and undermine local plan policies which in Richmond, were found sound only last year on the basis of a robust evidence base which included an assessment of housing needs and development viability. The Council's Whole Plan Viability Assessment (2023) demonstrated that, whilst there is variation in the viability of developments expected to come forward in Richmond, a 50% overall requirement would deliver the greatest amount of much needed affordable housing overall. For conformity with the London Plan, the Local Plan was modified prior to adoption to allow access to the Fast Track Route which sets the effective requirement upon developments at either 35% or 50%. However, there is no evidence in the Local Plan or its supporting evidence base that points to a lower threshold of 20%, of which half could potentially be publicly funded, being justified or effective on the basis of viability. The WPVA also clearly identifies that the least viable development typologies in Richmond, which would be those

¹ [Local housing needs assessment 2023](#)

mostly likely to deliver more affordable housing under the new route, are not expected to be a significant source of housing supply. For the majority of sites which could viably deliver in excess of 10-20% affordable housing, as evidenced by the WPVA, the availability of the new planning route will create a clear incentive to cap their contribution at 20% without any site-specific viability justification at the opportunity cost of delivering much-needed affordable housing.

It is vital that new policy of any kind, but particularly policy that relates to a matter as important as affordable housing, is properly informed by evidence and public scrutiny of that evidence. Due to the lack of evidence for the new planning route, the Council considers an LPG to be an inappropriate method for introducing new policy that operates at the same level of instruction as a London Plan policy. The Council would encourage you to instead concentrate any review of affordable housing policy in the new London Plan, on the basis of a transparent evidence base and effective collaboration with individual Boroughs.

In relation to evidence and justification, the GLA's background report explores a range of factors that are negatively impacting London's housing market at this time, including build cost inflation, declining sales rates and delays with the Building Safety Regulator. The Council acknowledges that these factors are having a negative impact on London's development market and would support, in principle, targeted interventions at every tier of government to address these factors. However, it is not clear from the background report how the proposed new planning route seeks to address any of these factors. In some ways, the proposals may actually worsen housing delivery given the main challenge in the current development market is the lack of effective demand of market for sale units. The Council feels that lowering affordable housing contributions is unlikely to impact on insufficient demand for market housing and, if anything, a higher share of for sale market units will saturate the private housing market even further. There is a range of evidence, including Lichfields' Start to Finish Report (2024), which shows that developments with lower levels of affordable housing on-site build out more slowly than those with higher levels. Furthermore, in the short to medium term, the proposals create uncertainty which readily risks the unintended consequence of delay, including for sites which could viably progress with delivering a higher quantum of affordable housing without additional public subsidy.

Importantly, the new route also proposes to largely displace the Viability Tested Route which already offers an established and transparent route for developments which cannot viably meet the requirements of affordable housing policies. The Council feels it is important that the effective operation of the Viability Tested Route is not undermined and that any perceived disincentives of the Viability Tested Route, in terms of time to decision, are not exaggerated. In the Council's experience, viability negotiations under the Viability Tested Route are often concluded efficiently and prior to a number of other planning issues.

Whilst the Council does not support the new affordable housing route on principle, it considers that its harms could be somewhat lessened if eligibility was tightened to prevent developments with existing permissions above 20% from accessing the route or if provisions for meaningful viability testing were introduced.

Cycling and Housing Standards

The Council supports the principle of ambitious cycling and housing standards to ensure that developments that come forward enable both high standards of living and facilitate healthy and active lifestyles. However, recognising some of the challenges facing housebuilding in London, the Council does not oppose the principle of applying cycle and housing standards with a modest degree of additional flexibility provided that any additional flexibilities are justified when looking at a particular development and that the overall objectives of setting such standards are not undermined. That said, in the context of the wider challenges experienced in the housebuilding market, the Council is doubtful that these flexibilities will be effective at unlocking stalled sites and are more likely to be attractive to viable sites. Because of this, the Council would encourage that the LPG includes proportionate guards against unintended consequences which could include, for example, viable developments seeking to take advantage of additional flexibilities where not strictly necessary to improve deliverability and delays to the timely implementation of existing permissions where developers re-apply to take advantage of additional flexibilities.

We thank you for the time taken to review our detailed comments, attached, which we hope will be used to influence the development of these proposals. We have also worked with a range of partners, including London Councils, to develop their own responses, which we support.

We remain committed to delivering sustainable growth in Richmond and are happy to work with you and your team to review and refine these measures so that they can be made better targeted, justified and more effective.

Yours Sincerely,

Cllr Julia Neden-Watts

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

cllr.j.neden-watts@richmond.gov.uk

cc

Munira Wilson MP: munira.wilson.mp@parliament.uk

Ruth Cadbury MP: ruthcadburymp@parliament.uk

Sarah Olney MP: sarah.olney.mp@parliament.uk