LONDON BOROUGH OF RICHMOND UPON THAMES

Richmond Council
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Date: 15 October 2026

Mayor of London
City Hall
Kamal Chunchie Way
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SENT BY EMAIL

Dear Sir Sadiq

Response to the draft London Plan on behalf of London Borough of Richmond upon Thames

Thank you for the opportunity to respond to your consultation on the draft London Plan. On behalf of the London Borough of Richmond upon Thames (the Council), I am pleased to present you with our detailed formal response, which accompanies this letter. We would be glad to work with you and your officers further to expand upon the matters we raise as the draft Plan moves forward.

We welcome the London Plan's continued commitment to harnessing and delivering good growth for all of London, including your commitments to making the best use of London's land, delivering the homes and neighbourhoods Londoners need, growing London's economy in a way that benefits all and creating a greener, resilient and healthy city.

I have summarised some of the key matters arising from our response below.

Housing Delivery and Targets

The Council is deeply committed to increasing housing delivery and has, through its Local Plan and the Richmond Growth Plan, adopted an ambitious strategy for delivering the right types and tenures of housing in the right places. In this context, the Council supports the principle of the Plan's capacity-led approach to housing targets and wishes to stress the importance of ensuring that the targets set for individual boroughs strike the right balance between ambition and achievability, having regard to the best available evidence on capacity, constraints and viability. Unachievable targets would inevitably mean a greater number of boroughs are subject to national policy sanctions which serve to undermine the plan-led system and erode many of the good growth objectives that your draft Plan aims to achieve and which we support.

The Council welcomes the fact that its housing target is expected to be delivered entirely on brownfield land. The Council considers it important that development makes the best and most efficient use of brownfield land to ensure the Borough's important network of green spaces continue to be protected for years to come in recognition of their multi-faceted benefits for all of London, including for nature, recreation and the wider environment.

As you will know, Richmond upon Thames is a highly distinctive borough, with much of its area comprising nationally and internationally important parks and natural spaces, a vast network of heritage assets including World Heritage Sites and listed buildings, extensive conservation areas and significant areas facing heightened flooding and climate change risks. This rich natural and historic environment is strategically important to all Londoners and plays a vital role in terms of public health, ecology, climate change resilience, tourism, culture and overall well-being. Consequently, striking an appropriate balance between the conservation and enhancement of this environment and accommodating opportunities for new growth is an issue at the heart of every plan for Richmond.

In this context, we note with concern that the borough's housing target is proposed to increase by a substantial 31%. This new target (around 540 homes per year) is an annual rate of delivery that has only been achieved three times in 25 years, and never in the past ten.

As set out in our full response, we have a number of concerns regarding the underlying evidence base that has informed the borough's proposed housing target. Taken together, we feel these concerns amount to a strong indication that the target proposed is unrealistic, being substantially higher than both our current housing target and average levels of delivery, without a credible pathway to achieving such a significant increase. This challenge is compounded by the borough's lack of organically arising strategic sites and the stalled nature of a number of consented sites due to factors beyond the influence of planning policy or the Council. Without obvious opportunities for new strategic sites, or a guarantee that existing strategic sites will deliver, the Council is concerned that its proposed housing target will place an unacceptable burden on smaller sites to accommodate growth in locations or at densities that are likely to incrementally erode Richmond's historic and natural environments and distinctive townscape. There should be lessons learnt that the increase in delivery from small sites you set out in the current London Plan did not materialise. For these reasons, we would welcome an opportunity to work with you and your officers further to review elements of the evidence base to ensure that the borough's housing target is ambitious but ultimately deliverable, having full regard to the available evidence on capacity, constraints and viability. The Council would also welcome an opportunity to discuss the targets in the context of build out rates and economic conditions, in light of the limited influence that boroughs have over implementation of the permissions they grant.

Affordable Housing

The Council places great importance on delivering genuinely affordable housing, recognising significant local needs, particularly for social rented housing. I recognise that challenging viability conditions are affecting housebuilding rates in London and that you have sought to find a balance in how your affordable housing policy seeks to respond to high needs whilst acknowledging these conditions.

We would emphasise that maintaining a positive supply of affordable housing in these conditions is not only vital for meeting needs but also for maintaining delivery in a housing market where housebuilders are struggling to find buyers for market housing, but where there remains considerable demand for affordable housing. The Council also recognises the significant grant programme being administered at present which we hope will create much greater capacity for affordable housing-funded delivery.

The Council strongly welcomes retaining the 50% strategic target and the inclusion of Richmond in Location Band A, noting it is the only outer London borough subject to the highest affordable housing requirements. This reflects and supports the considerable need for affordable housing locally.

However, in light of the matters above, we have concerns that your proposal to lower the thresholds for public land, industrial land and sites smaller than 36 dwellings may entrench current viability challenges into long-term policy. We are particularly concerned about the potential inflationary impact of these new thresholds on land values, noting that, unlike your time-limited measures, there is no expiry mechanism and therefore no obvious mitigation. Because of this and given Richmond's unique reliance on small to medium-sized sites, we are concerned that long-term affordable housing delivery may not be optimised under this new policy, particularly given less viable proposals would have retained the option of viability testing in any case.

We also note your proposal to fix affordable housing tenure at 60:40 for all boroughs. Richmond, like many boroughs, has a particularly significant long-term need for social rented housing, which has recently informed a sound local policy which fixes tenure instead at 70:30. In this context, we feel that a pan-London fixed split of 60:40 is not justified, having regard to local evidence and the findings of Richmond's recent examination process. We feel that this split will not optimise the delivery of social rented housing, which is the tenure most needed both in the borough and London as a whole.

As set out in our full response, we would support changes to your draft Plan that recognise the potential for local plans (including those in Band A) to justify local thresholds and tenure splits which maintain the overall structure of your policy, but allow for local evidence on need and viability to be taken into account. This would, for example, allow individual boroughs to introduce 70:30 tenure splits or a higher threshold for sites of between 10 and 35 dwellings where an Inspector is satisfied this is justified locally. We would welcome opportunities to discuss these matters with you further, considering our shared interest in optimising affordable housing delivery.

Optimisation and Tall Buildings

The Council notes that the draft Plan proposes to introduce a new Optimisation Framework (the Framework) which it understands will largely replace the current design-led approach to site optimisation.

The Council supports the principle of making more effective use of land, recognising the scarcity and competition for land across London, and the need to avoid incentivising development on greenfield land. In this context, the Council recognises that there are areas in the borough where increased densities or heights are appropriate and has sought to pro-actively identify these through 'mid-rise building zones' in its Local Plan. This approach, combined with a design-led approach to optimisation, is considered to have been largely effective at ensuring each site comes forward at a density and height that is appropriate in context. Conversely, the Framework appears to partially

reintroduce the previous Density Matrix approach, which was deliberately removed from the London Plan because it was unreliable when used. Its removal was supported by the Council at the time.

The Council is particularly concerned that moving away from a plan-led approach to managing densities and heights to the use of a pan-London framework is likely to increase average densities and heights in a way that does not simply make better use of land but which, through its imprecision, is actively harmful to the natural and historic environment when applied at the granular local level. In its full response, the Council has raised a number of concerns relating to the evidential basis for the Framework, including the accuracy and granularity in its underlying contextual mapping and accessibility measures.

As stated elsewhere, Richmond has a uniquely rich historic environment, being home to a World Heritage Site, protected views, a vast network of conservation areas and very many listed buildings. The Council is particularly concerned that the densities within the Framework have not been informed by any consideration of the presence of heritage assets, with the draft Plan's only qualifier simply suggesting that the presence of heritage assets *may* mean that the lower end of a range is more suitable. In reality, heritage impacts must be assessed on the basis of harm, in line with national policy, and it is conceivable that even the lower end of a range may cause substantial harm due to the particular characteristics of a site and the sensitivity of nearby heritage assets. Whilst this could be mitigated by a recognition within the draft Plan that the Framework is only indicative and that site-based considerations may continue to justify alternative densities, the wording within the draft Plan bestows a degree of certainty to the Framework which we feel is not justified when considering the issues with its underlying evidence and its treatment of heritage assets, summarised above.

The Council also notes that the draft Plan proposes to change the definition of a tall building to a building of at least 30m in height. The current Richmond Local Plan uses a definition of 21m, which is certainly tall in a Richmond context. Under this new definition, none of the tall building zones in Richmond would qualify and they would all instead fall to be considered under the Framework, subject to the same concerns above. The Council is concerned that the proposed definition fails to recognise the variation of what tall means in a local context and risks proposals for tall buildings in outer London Boroughs, such as Richmond, ceasing to be guided by a plan-led approach. For the same reasons as above, this approach risks leading to an incremental erosion of the historic and natural environments which we feel strongly is better managed under a plan- and design-led approach.

Sustainability, Environment and Climate Change

We welcome your draft Plan's continued emphasis on the importance of enhancing the natural environment and ensuring resilience to climate change.

In particular, we support the draft Plan's increased emphasis on climate adaptation and carbon reduction, including the need for developments to incorporate measures relating to low carbon heat, embodied carbon and overheating risk, and increased emphasis on domestic retrofit. We also support the draft Plan's references to the importance of improving the health and cleanliness of London's rivers and canals, as well as people's access to them, with particular references to the role of Joint Thames Strategies, including the Thames Landscape Strategy, and the importance of ensuring that these strategies inform and influence planning decisions and outcomes.

We also support the principle of a number of your proposed changes in relation to new energy efficiency and embodied carbon standards. However, as set out in our full response, we have some concerns over the level at which these standards are set or the types of development they apply to. The Council is particularly concerned over proposed restrictions on the ability for boroughs to set their own, more ambitious, standards through local plans, even where these are clearly justified. Richmond's Local Plan, adopted just last year, successfully justified a number of environmental policies which go beyond both national and regional standards (both in relation to what the policies require and the range of developments they apply to) on the basis of the compelling case for ambitious climate policies and local viability capacity for these policies. The Council also notes that the Government's proposed restriction on setting local energy standards has been removed since the draft Plan was published for consultation. This means that the draft Plan, as written, restricts London boroughs to a less ambitious ceiling than any borough outside of London. To ensure that planning decisions and outcomes make the maximum possible contribution to achieving a net zero standard and to making London more climate resilient, we would strongly encourage you to ensure the London Plan sets ambitious standards whilst continuing to allow local plans to set their own standards where these are compatible and justified.

The Council also notes with some concern that the carbon off-setting mechanism is proposed to be removed, despite the crucial role this mechanism plays in incentivising and achieving a net zero standard. The Council considers that this mechanism, or a similar energy balancing mechanism, is vital to ensuring that developments remain appropriately incentivised to deliver to net zero. The Council would strongly encourage you to review this draft policy to reinstate an appropriate off-setting mechanism.

In relation to Heathrow expansion, I note the draft Plan opposes expansion of Heathrow unless "*no unacceptable environmental, transport, and congestion impacts are demonstrated".* In light of the Climate Change Commission's findings that Heathrow's expansion has "no credible pathway to net zero" and the unacceptable environmental, noise and congestion challenges presented by Heathrow's expansion, the Council would encourage you to make clear that the expansion of Heathrow as proposed is incompatible with the objectives of the draft Plan.

We hope these comments, and those set out in our formal response are useful to you and your officers as you move forward with the London Plan. We would welcome the opportunity to work with you as the Plan progresses, including through its Examination, to ensure these matters are appropriately addressed in the final version.

Yours sincerely,

Cllr Julia Neden-Watts
Chair of the Environment, Sustainability, Culture and Sports Committee
London Borough of Richmond upon Thames