

Housing Delivery Test Action Plan

Planning

1 June 2025

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Summary

Richmond have prepared a Housing Delivery Test (HDT) Action Plan in response to the Housing Delivery Test measurement for 2022/23, published in December 2024. This result was calculated by the Ministry of Housing, Communities and Local Government (MHCLG). Therefore, the figures included in the measurement may not directly relate to the Council's figures included within our Authority Monitoring Report - [Local Plan monitoring - London Borough of Richmond upon Thames](#) as different assumptions have been applied to the different sets of figures.

The Housing Delivery Test Action Plan is not a strategy or guidance document and does not hold weight in planning decisions, it is purely a means for the Council to clearly set out the possible reasons for not meeting housing targets in recent years, even if these reasons were out of the Council's control, then set out clear actions which could have a positive impact on future housing delivery.

The HDT Action Plan is designed to look at wider issues impacting housing delivery which are more likely to impact on longer term housing delivery, therefore, the Action Plan does not consider site allocations, or specific sites in great detail, as these would only impact on delivery in the shorter term. It is also important to note that the nature of the document is to consider a variety of actions, many of which may not suddenly increase housing delivery, but are likely to have an impact in the longer term. Therefore, the actions proposed in the document may take time to come to fruition. This is the Council's second Action Plan, and updates on progress from the first Action Plan, alongside identifying new actions as relevant.

1.0 Introduction

- 1.1 In 2018 the Housing Delivery Test was introduced by Government and forms part of the National Planning Policy Framework. It is an annual measurement that takes into account the previous 3 years of housing delivery against the annual housing target.
- 1.2 The Housing Delivery Test requirements are set out within the NPPF 2025, paragraph 79, and include the following requirements:
- 1.3 "To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority's housing requirement over the previous three years, the following policy consequences should apply:
 - a) where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;
 - b) where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 78 of this framework, in addition to the requirement for an action plan.
 - c) where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in

footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer.

- 1.4 Based on the past 3 years of delivery compared against the required number of homes over a 3 year period based on Richmond's housing target, Richmond's HDT result published in 2024 was 60%:

	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2023 measurement	Housing Delivery Test: 2023 consequence
	2020-21	2021-22	2022-23		2020-21	2021-22	2022-23			
Richmond upon Thames	210	315	315	840	180	176	146	501	60%	Presumption

Figure 1.1 – Housing Delivery Test measurement 2023, published 12 December 2024

- 1.5 In relation to the required housing in the table above, it is important to note the London Plan target equivalent to 4,110 dwellings from 2021-2031 is not included. This is due to the previous housing target of 315 dwellings per annum being applicable in those years as the HDT uses the adopted Local Plan housing requirement as part of the calculation. In addition, the number of homes required were reduced in year 2020-21 to account for the disruption to the development industry as a result of COVID-19.
- 1.6 Based on the results in figure 1.1 above this means the HDT result shows a housing delivery test measurement of 60%. As this result is below the 75% threshold as per point; c) above, this will result in the following consequences being applied; Richmond is therefore now in a presumption in favour of sustainable development, will need to include a 20% buffer as part of the housing land supply, and be required to produce an Action Plan. There are 11 other London Boroughs which fall into the presumption in favour of sustainable development, which equates to 37% of Boroughs. In total 60% of London Boroughs fall below the 95% threshold.
- 1.7 An action plan is not considered as a strategy or guidance document and does not carry weight with planning decisions. In addition, there are currently no specific requirements within National Planning Policy or National Planning Practice Guidance regarding what an Action plan must include, however, the Planning Advisory Service (PAS) guidance recommends the following 5 stepped approach:
- Stage 1 - Data gathering
 - Stage 2 - Root Cause Analysis
 - Stage 3 - Consulting and publishing
 - Stage 4 - Action planning
 - Stage 5 - Implementing and monitoring
- 1.8 The above steps form the basis for the HDT action plan and are set out below.

2.0 Step 1 – Data Gathering

Housing Figures

- 2.1 As with all London Boroughs the housing target for Richmond Upon Thames is set out within the London Plan (2021). The housing targets are included as 10 year targets (see London Plan, table 4.1). For Richmond the London Plan includes a 10 year target of 4,110 dwellings. Within the London Plan this is recommended to cover the period 2019/20 -2028/29, however, given the London Plan was adopted in 2021 and due to concerns regarding back dating the housing target prior to the adoption of the London Plan, it has been established in a the previous appeal decision PP/L5810/W/20/3249153 (paragraph 119) that the 10 year target should be applied over the 10 year period from 2021/22, to ensure the delivery of the target is achievable.
- 2.2 The London Plan includes recommendations on how the targets should be met, including achieving targets gradually over the 10 year period. This is clearly set out in the following statement in the London Plan, paragraph 4.1.10: “The increase in housing delivery required by these targets may be achieved gradually and boroughs are encouraged to set out a realistic and, where appropriate, stepped housing delivery target over a ten-year period. This should be supported by a clear articulation of how these homes will be delivered and any actions the boroughs will take in the event of under delivery”.
- 2.3 As per the recommendation within the London Plan, the Council is looking to approach the overall housing target in a stepped way. The stepped approach to delivering the London Plan Housing Target is included within emerging Local Plan policy 10 and sets out the following targets relative to the Council’s expected completions:
- 210 dwellings per annum between 2021/22-2024/25
 - 420 dwellings per annum between 2025/26-2027/28
 - 670 dwellings per annum between 2028/29-2030/31
- 2.4 The above totals the 10 year London Plan housing requirement of 4,110 dwellings between 2021-2031. More detail is available within the Council’s [Background Topic Paper on Housing Delivery](#). This approach will also allow the Council to progress sites wherever possible without compromising the Council’s priority of delivering affordable housing and protecting the historic environment within the borough which are both key components of the Council’s Corporate Plan 2022-2026. In addition, it is important for the Council to continue to apply adopted and emerging policies on the protection of employment land and key industrial sites which are vital for employment opportunities and jobs within Richmond.

Previous Completions

- 2.5 One of the key pitfalls of the Housing Delivery Test is it only looks back at the previous 3 years of delivery. To gain a clearer understanding of housing delivery it is important to consider completions over a longer period. The Council’s [2023/2024 Authority Monitoring Report](#) for the monitoring period 1st April 2023 to 31st March 2024 includes the annual

completions from 2002/03 to 2023/24 providing more detail on longer term delivery patterns.

Year	Completions	Target	% of Target
2002/03	319	270	118%
2003/04	246	270	91%
2004/05	582	270	216%
2005/06	842	270	312%
2006/07	230	270	85%
2007/08	260	270	96%
2008/09	436	270	161%
2009/10	145	270	54%
2010/11	399	270	148%
2011/12	208	245	85%
2012/13	695	245	284%
2013/14	235	245	96%
2014/15	304	245	124%
2015/16	491	245	200%
2016/17	460	315	146%
2017/18	382	315	121%
2018/19	419	315	133%
2019/20	331	315	105%
2020/21	206	315	65%
2021/22	164	411	40%
2022/23	141	411	34%
2023/24	100	411	24%
Total	7,595	6,463	118%

Figure 2.1 – Previous housing completions compared to HDT target

- 2.6 The above figures show that, since 2002/03, within the majority of monitoring years, the levels of completions have far outstripped the relevant annual housing target as set by previous London Plans. Since 2002/03, 7,595 dwellings have been completed in comparison to an overall housing target of 6,463 dwellings, meaning there is an overall surplus of 1,132 dwellings. However, within the bounds of the current HDT methodology this oversupply is not able to be considered. Within the past 3 years however, Richmond has struggled to meet the housing target. This pattern has not just been seen in Richmond, but across England and London as a whole, with only around 65% of Councils nationwide, and around 40% of London Boroughs meeting their housing targets within the most recently published HDT result. This shows under delivery in the past 3 years is not an exception.
- 2.7 This is understandable given the pressures on the development industry in recent years, including Brexit which has reduced the availability of labour, COVID-19 disruptions which temporarily halted development on many sites, high rates of inflation which have increased construction costs substantially, and increases in interest rates which have caused property values to fall slightly in some areas and reduced sales volumes. Given these pressures, it is a

difficult and volatile climate to deliver housing, especially on complex sites, therefore it is unsurprising recent delivery has not kept pace with previous levels. These issues are not unique to the borough and are seen in trends elsewhere across the Country.

- 2.8 The constraints with the HDT were considered by the previous Government, as mentioned within the ministerial statement published 19th December 2023. The current Government's update as of 12th December 2024 states *"Stakeholders will be aware that we are currently operating to a delayed publication timetable for HDT as a result of planning reforms and associated consultations. We recognise that authorities, developers and others rightly expect the HDT to be published according to a regular timetable. We are therefore, considering options for expediting future HDT collections, including the possibility of combining the data collections for the 2024 and 2025 HDTs. We will update in due course"*. We consider that regular and more recent analysis would be helpful going forward. At present, there are currently no plans to change how the HDT is calculated, however, it is understood that the Planning Advisory Service (PAS) are carrying out a technical study to assess how other aspects such as the number of permissions granted could be considered.

Dwelling Types Completed

- 2.9 It is also important to consider the types of dwellings completed when assessing overall completions. The Council's policy position is to seek family sized dwellings which are defined in Local Plan policy as 2 bedroom 3 person dwellings and larger, in addition to maximising the provision of 3 bedroom dwellings, especially as Social Rent, which understandably has an impact on the density of sites. This approach aligns with the demographic within the borough, which has a higher proportion of families than many other London Boroughs.

	Completions by house type						
	2023/24 Completions	2022/23 Completions	2021/22 Completions	2020/21 Completions	2019/20 Completions	TOTAL	Percentage
1 bed	57	65	82	69	97	370	39%
2 bed	32	45	60	93	154	384	41%
3 bed	-2	15	12	22	61	108	11%
4+ bed	13	16	10	22	19	80	8%
Total	100	141	164	206	331	942	100%

Figure 2.2 – Completions by house type from 2019/20 to 2023/24.

- 2.10 The figures above show in the past 5 years 61% of the homes delivered have been 2-bedroom dwellings or larger, with 20% of overall delivery being 3 and 4 bed dwellings or larger. These are marginally lower than the previous year. This still shows the Council's focus of delivery family sized dwellings is very much applied in practice and will likely have impacted overall numbers delivered as a higher number of larger dwellings will have lowered densities on sites overall. However, it is important to deliver the types of homes required by the local demographic even if that does result in an overall reduction in the total number of homes delivered.

Dwellings Permitted Each Year

- 2.11 Although the number of completions within the past year has struggled to meet the housing target, Richmond is consistently approving a high number of applications within statutory timescales for applications. This is a requirement for all planning authorities to determine planning applications within 8 weeks or 13 weeks of validation, depending on application type.
- 2.12 To monitor this, Richmond uses the [Planning Advisory Service 'Designation Crystal Ball'](#), which is a tool used to monitor the efficiency of the planning department by tracking planning decisions within the statutory timeframe. More detail is available in Appendix 2. The overall results show between Jan 2019-March 2025: 92% of minor and other planning applications have been determined within the statutory timeframe or within agreed extension of time, and 95% of major planning applications have been determined within the statutory timeframe or within agreed extension of time. This shows the Council's planning department are hitting required targets well in relation to the time taken to determine applications.
- 2.13 The Council have also taken steps to improve this process with the implementation of a new software system to determine applications, which the Council expects to speed up decision making in the future. Although there may be short term impacts on the speed of decisions whilst the new system beds in, the longer-term benefits are anticipated to outweigh any short-term impacts on decision-making. The [new system](#) came into effect in February 2025, so there may be some impacts of this seen in the first and second quarter of 2025. However, so far based on the results within Appendix 2, decision rates have remained well above requirements for both minor and major applications.
- 2.14 The other important point to consider is the actual number of dwellings approved each year. A high number of dwellings approved should translate into a higher number of housing completions in due course. The most recent data includes the following number of dwellings permitted per year since 2008-09:

Permitted Net Units	
Monitoring year	Sum of Net Dwellings
2008-2009	457
2009-2010	286
2010-2011	593
2011-2012	570
2012-2013	140
2013-2014	777
2014-2015	991
2015-2016	567
2016-2017	648
2017-2018	570
2018-2019	221

2019-2020	244
2020-2021	434
2021-2022	169
2022-2023	749
2023-2024	128
Grand Total	7544
Average	472

Figure 2.3 – Number of dwellings permitted per year between 2008/2009 – 2023/2024

- 2.15 The above table shows that on average since 2008/2009, 472 dwellings were permitted each year, with 2014-15 showing the highest number of permissions, (991 dwellings), followed by 2013-14, (777 dwellings), closely followed by 2022-23 (749 dwellings). The 2022-23 numbers permitted are significant when compared to the previous year where only 169 dwellings were permitted, which was most likely a result of the COVID-19 pandemic and has most likely significantly contributed to the lower number of completions seen in 2023-24.
- 2.16 In addition, since the last monitoring period, the Stag Brewery application (see further details in section 4) was approved May 2025 which includes permission for over 1,000 dwellings within Mortlake and will help bolster the Council's housing supply position in the medium term. This will be recorded as part of the next monitoring period.

Lapse Rates

- 2.17 It is important to note that Councils can only provide permissions and are not responsible for delivering dwellings. A useful measure of the local economy is understanding lapse rates as this can point towards pressures on the development industry which are outside the control of the Council. Richmond previously published a [Background Topic Paper on Housing Delivery](#) which formed part of the evidence base for the emerging Local Plan and provides further detail on lapse rates. The figure 5.5 below shows the number of lapsed dwellings as a percentage of the number of dwellings permitted within that monitoring year. The average lapse rate per annum since 2008-2009 is 9%, however, an almost all-time high was recorded of 129 dwellings in 2023/24.

Year	Net units - Expired Residential Permissions	Net units - Residential Permissions	% Expired
2008-2009	20	457	4%
2009-2010	27	286	9%
2010-2011	36	593	6%
2011-2012	41	570	7%
2012-2013	21	140	15%
2013-2014	132	777	17%
2014-2015	23	991	2%
2015-2016	-4	567	-1%
2016-2017	5	648	1%

2017-2018	72	570	13%
2018-2019	14	221	6%
2019-2020	25	244	10%
2020-2021	25	434	6%
2021-2022	78	169	46%
2022-2023	16	749	2%
2023-2024	129	128	101%
Total	660	7544	9%

Figure 2.4 – The number of dwellings with expired permissions between 2008/2009 to 2023/24 in comparison to the number of dwellings permitted.

- 2.18 This shows generally lapse rates are historically fairly low, however the high level of lapse rates within 2021-2022 and 2023-2024 is likely to have contributed to the lower level of completions in the past 3 years.

Planning Permission to Completion

- 2.19 To understand why the housing targets have not been reached in the past three years, the [Background Topic Paper on Housing Delivery](#) also assessed the amount of time taken from receipt of permission to completion. The following table shows the results of the analysis from 2015-2024:

	Site size (number of dwellings)		
Year	<10	10+	Grand Total
2015	1.9	6.1	2.0
2016	1.8	2.3	1.9
2017	2.2	2.4	2.2
2018	2.3	3.0	2.3
2019	2.1	3.3	2.2
2020	2.6	2.8	2.6
2021	2.2	4.4	2.2
2022	2.6	4.9	2.8
2023	2.1	5.1	2.1
2024	2.5	3.7	2.6
Average	2.2	3.8	2.3

Figure 2.5 – The amount of time taken from receipt of permission to completion from 2015 to 2024.

- 2.20 On average it took sites of less than 10 dwellings 2.2 years to be completed and sites over 10 dwellings 3.8 years to be completed. However, there were instances where sites of 100 or more dwellings took 10 years to be completed. More information is available within the [Background Topic Paper on Housing Delivery](#). This shows sites are coming forwards, however, the time taken for sites to be built out is steadily increasing, which as previously stated, the Council is only able to issue planning permissions and is less able to influence the speed of delivery much after this point.

- 2.21 Putting the number of permissions granted, lapse rates and the time taken for sites to be completed together, this shows the low level of permissions granted in 2021/22 and 2023/24 with the high lapse rates in 2021/22 and again in 2023/24, will have had a significant impact on the following monitoring years as seen within the completions in the most recent monitoring period, and will most likely have a significant impact on the next monitoring year, given such a large proportion of dwellings are often completed within the 2 years following the grant of permission.

3.0 Step 2 – Root Causes

Housing Figure Conclusions

- 3.1 The key points from the housing figures which show why delivery within Richmond over the past 3 years hasn't reached the adopted housing target are as follows:
- 1) Low levels of permissions in 2021/22 coupled with high lapse rates in that year, would have significantly impacted on the number of completions seen in 2022/23 and 2023/24, especially when considering the average time for a site of below 10 dwellings to go from permission to being completed is 2.2 years. Overall, it's likely that the impacts of COVID-19 and the sudden interest and inflation increases seen from 2022 are still resulting in negative impacts on the development industry.
 - 2) The number of dwellings permitted in 2022/23 was far higher, however, this trend has not continued into 2023/24 with a low number of permissions granted in that monitoring year. Again, this is most likely due to outside factors, such as the high inflation rates seen since 2022, and the softer housing market as a result of higher interest rates.
 - 3) The data above shows Richmond has been achieving targets in relation to providing decisions within statutory timeframes, however, this has not appeared to filter through into overall completions, resulting in additional units remaining in the delivery pipeline.
- 3.2 Other impacts outside the Local Planning Authority's control which have impacted on the delivery of housing:
- 1) In discussions with developers, there a clear feeling in the industry that the Building Safety Act and Building Safety Regulator are causing significant delays on development starts, due to gateway checks throughout the development process. Although there very few examples of tall buildings in Richmond that would be impacted, the Council are aware of several sites in the borough that are either being impacted or are likely to be impacted in the near future as a result of delays as part of this process, which is of course outside the Council's control.
 - 2) The COVID-19 pandemic resulted in development being halted on sites, particularly impacting small sites due to impacts on cashflow and contractors being less able to work separately or at 2m distance. Richmond's housing delivery is highly reliant on the contribution from small sites and these factors will have impacted on overall delivery in boroughs like Richmond much more than boroughs with a higher number of large sites.

- 3) The war in Ukraine and Brexit previously had knock on effects on economic conditions and supply chains in Europe resulting in rising fuel prices, skills shortages and issues accessing key building materials, all compounding high rates of inflation. Although inflation rates have been more stable over the previous monitoring period, global uncertainties continue and the cost of building materials has remained high. There have been a number of cases of developers not completing sites due to extensive financial pressure. These factors impacted smaller developers far more, which Richmond is heavily reliant on to deliver housing numbers.
- 4) Housing Land pressure is acute within Richmond as available land is highly constrained (i.e large numbers of conservation areas, high numbers of listed buildings and large areas of protected open space), therefore land for development is in short supply. More information on this is included below.
- 5) Impacts on the development industry from additional regulations including fire regulations and a requirement for second staircases in new residential tall buildings (with this requirement becoming mandatory in all new residential buildings above 18m from 2026 through Building Regulations).
- 6) Financial pressure on Registered Providers (RPs), due to additional regulations, resulting in RP's focussing on improvements to existing stock and reducing spending in delivering new schemes and purchasing additional affordable homes through S106, this creates uncertainty for developers.

Housing Land Pressures

- 3.3 One of Richmond's greatest pressures on housing delivery is the lack of suitable and available housing sites. More than two thirds of the borough is protected by either open space or conservation area status. These include historic landscapes such as Richmond and Bushy Parks and the Old Deer Park, the River Thames and the River Crane corridors, and other tributaries. In addition, Richmond is the only London Borough that is located on both sides of the River Thames adding additional pressures to development due to flooding constraints and environmental protections associated with the River Thames.
- 3.4 The borough's exceptional historic environment is central to its character, and much of the borough is characterised by primarily low to medium-rise residential patterns, which has produced very attractive townscapes and is important to the borough's distinctive character. The borough has 85 designated Conservation Areas and approximately 820 listed buildings, including some war memorials, 6 Scheduled Ancient Monuments as well as 16 Historic Park and Gardens that are on the Historic England Register of Historic Parks and Gardens, all of which make a significant contribution to the special character of the borough. The borough is also home to the Royal Botanic Gardens, Kew World Heritage Site. One of the ways the London Plan seeks to accommodate the high levels of housing need across London is the requirement to fully optimise development sites, in relation to height and density, which due to historic and conservation constraints, is highly challenging to achieve in the borough

without significant negative impacts to existing listed buildings, conservation areas, important townscapes and open space designations.

- 3.5 In addition to the pressures on housing land supply from the historic environment, the borough also has a limited supply of employment and industrial land which as defined in the Council's Employment Land and Premises Needs Assessment Update, published April 2023. Within the study it defined additional industrial floorspace and office space is required over the plan period, but accepted the pipeline supply of this type of development is negligible within Richmond. One of the key policies within the emerging Local Plan is living locally and being able to access services, facilities and employment within 20 minutes, emphasising active travel, therefore the protection of employment land is highly important to the wider strategic aims to enable people to be employed locally, which could be under threat if the remaining employment land is not properly protected.
- 3.6 The other key pressure on land resources within the borough is from the highly important tourism economy, brought about from the above mentioned; Royal Botanic Gardens, Kew World Heritage Site, but also Twickenham's nationally important rugby venues at Twickenham Stadium, a world famous landmark and the home of Rugby Union, and The Stoop (Harlequins Rugby Football Club). This means the borough needs to ensure the tourism economy is properly catered for with hotel accommodation and associated leisure facilities such as restaurants, pubs, retail floorspace etc, which are properly protected to ensure this is not constantly over-subscribed.
- 3.7 The above factors together result in there being very limited opportunities for development within the borough, with limited ability to increase density on available sites due to important conservation and heritage constraints, and the different needs of the existing residents and visitor economy, all put considerable strain on the limited land available which can create conflicts and means the ability to develop sites for housing is often complex.

4.0 Specific Site Issues

- 4.1 There are a number of sites within the borough that have had issues which have been out of the boroughs control and have had a direct impact on housing completions. This includes but are not limited to:
 - a. The Stag Brewery
 - b. Homebase
- 4.2 The applications above would equate to around 1,600 dwellings within Richmond, equivalent to just under 4 years supply of housing. Both applications were called in by the Mayor of London as they all fall within the circumstances to allow for a site to be called in by the Greater Local Authority (GLA).

Stag Brewery

- 4.3 The Stag Brewery application (18/0547/FUL) was first submitted to Richmond 19 February 2018. The application included a hybrid application including 439 residential apartments, plus an Outline application for up to 224 dwellings, plus a Nursing and care home (up to 80 ensuite rooms) with associated facilities d) Up to 150 units of flexible use living accommodation for either assisted living or residential use. The application was reviewed by Richmond; On 22 April 2020 Richmond advised the Mayor that it was minded to grant planning permission for Application A and Application B of the Former Stag Brewery in accordance with officers' recommendation, but resolved to refuse planning permission for Application C against officers' recommendation.
- 4.4 On 4 May 2020, having considered a report on the case, the Deputy Mayor notified Richmond that the Mayor would act as the local planning authority for the purposes of determining the planning applications. As per this process the GLA recommended a number of significant changes, including
- Increase in residential unit provision from up to 813 units (including 150 flexible assisted living and/or residential units) to up to 1,250 units.
 - Increase in affordable housing provision from up to 17% to up to 30%.
 - Increase in height of some buildings, of up to three storeys.
 - Conversion of Block 20 from a row of terrace housing to a pair of four storey buildings.
 - Removal of the nursing home and assisted living proposals from Development Area 2.
- 4.5 However, even though the applicants fully cooperated with the GLA and carried out all required changes the application was refused by the GLA on the grounds of height, massing, heritage impacts and lack of signed S106 agreement on 17 August 2021
- 4.6 A further application was then submitted to the Council, 18 March 2022 (22/0900/OUT). This included a total of 1,068 dwellings and a number of community facilities. The Council resolved to grant the application at committee in July 2023. However, the Government then updated fire regulations in October 2023, including the requirement for an additional staircase in residential buildings over 30m, which includes some of the proposed blocks on the site.
- 4.7 This resulted in the applicants, making some amendments to the scheme to accommodate these updated fire safety requirements adding to the timescale of the development, including reducing the amount of employment floorspace provided and slightly increasing the number of dwellings. This resulted in 1,075 dwellings being proposed. This scheme went to planning committee in Richmond in January 2024, in which the Council held a special committee at this time to permit the scheme without delay. The scheme was then referred to the GLA. However, the applicant provided the following letter to the Council to disclose they would be going to appeal, the letter included the following statement:

“Our client regrets that the need to appeal has arisen. Following the Mayor of London’s direction to refuse permission for two earlier applications in 2021, the applications have been re-designed to overcome the Mayor’s concerns relating to height, massing and visual impact, the impact on heritage assets and the effect on the amenities of neighbouring properties. These design choices were made with the support of the London Borough of Richmond-upon-Thames (“LBRuT”).

LBRuT has resolved to grant permission for the revised applications. Its independent consultants have twice robustly interrogated the viability of the proposed development and have reached the conclusion that it simply cannot support any greater quantum of affordable housing. Our client has agreed to accept a profit well below market norms in order to bring the scheme forward to provide homes for Londoners, a new secondary school and a new heart for Mortlake on what is currently an under-used previously-developed site with only a meanwhile permission. LBRuT agrees with our client that the proposed development would deliver its aspirations for the site.

Notwithstanding, the Greater London Authority (“GLA”) has consistently indicated its opposition to the proposed development on the basis that it would not provide enough affordable housing. Our client has written to Jules Pipe, Deputy Mayor for Planning, Regeneration and Skills in an attempt to overcome this impasse without any meaningful progress. GLA officers have met our client’s viability consultant and, in those discussions, their queries regarding viability were all responded to. Subsequently, our client and their planning consultants met with the Head Case Officer for the GLA where it was indicated that the level of affordable housing was too low and that there would be many months of further delay and the outcome would most likely be to direct refusal. The GLA has not notified our client or (to the best of our client’s knowledge) notified LBRuT of any legitimate, evidence-based objection to the proposed development, but in the circumstances in which the GLA has indicated that it will not grant permission (or allow LBRuT to do so expeditiously), our client has no choice but to lodge appeals for non-determination notwithstanding the LBRuT’s support for the proposals.”

- 4.8 Since this time, the Stag brewery inquiry opened on 5 November and sat until 12 December 2024. The Planning Inspectorate issued their decision notice on 2 May 2025 which Allowed both Appeals, (Ref: APP/L5810/W/24/3339060 and Ref: APP/L5810/W/24/3339062).
- 4.9 Although the amount of affordable housing proposed as part of the scheme is disappointing to the Council, when considering it in relation to the provision of additional housing, it is welcomed by the Council and will significantly bolster our medium-term housing land supply. However, determining this application for a significant number of new dwellings, has taken protracted time as noted above. The analysis above shows that the application has been in the planning system for over 7 years in total, with Richmond granting approval for the scheme twice and the GLA seeking considerable amendments only to refuse the application on both occasions.
- 4.10 It is important to note that the Stag Brewery appeared within the annual housing monitoring report as early as 2016/17, with 100 dwellings estimated to be completed between 2017-2022 and 500 dwellings between 2022-2027. This could have added around 100 dwellings to the overall completions in the past 3 years if the application had been permitted in 2020

when it was first approved by Richmond. The above timeline shows the Council has made every effort to get the scheme built out and other circumstances outside the Council's control have prevented this, which has directly impacted on overall completions.

Homebase

- 4.11 The application for Homebase was first received on 14 February 2019 and included a proposal for a total of 453 dwellings (under application 19/0510/FUL). On 29/07/2019 the Mayor of London took over the purposes of determining the application (GLA reference GLA/6252). The Mayor requested a number of changes subsequent to the call in, which were consulted on in December 2019 and January 2020. Further changes were requested and the applicant made further changes to the scheme which were consulted on in August 2020. A representation hearing was held on 1 October 2020, where the Mayor resolved to grant planning permission subject to the completion of an S106 agreement.
- 4.12 Since the 1 October 2020, Richmond have requested a number of updates and progress on the S106 for Homebase, however, no response to this delay was provided. Subsequently the applicant made further revisions and provided this to the Council and GLA on 28 September 2023. The reason for the 3 year delay has not been provided to Richmond by the GLA, however, this delay on a key site within Richmond will have had an impact on completions especially in the most recent monitoring period. The Section 106 Agreement was later signed in 2024, however, development does not appear to have commenced at this time.

5.0 Step 3 – Consulting and publishing

Development Industry Engagement

- 5.1 Within the PAS guidance it is recommended that as part of the action plan consultation with key stakeholders and ongoing consultation can be useful. As well as consulting on any parts of the action plan that may impact on key stakeholders.
- 5.2 As part of the Action Plan, to help understand the potential barriers to development, and ways the Council may be able to improve housing delivery across the borough, the Council produced a short survey and sent this out to a number of developers, planning professionals, Registered Providers and other companies operating within the development industry in Richmond in 2024 for the previous Housing Delivery Test Action plan. This survey has been repeated in April 2025 for this updated paper, with minor modifications to the questions asked. The results of the engagement, including a summary of the responses to the questionnaire are included in Appendix 3. The respondents to the previous questionnaire consisted of planning professionals and agents, small to medium house builders building 1-50 dwellings per annum within the borough, a national house builder and Registered Provider providing a good range of key stakeholders within the development industry. Although the Council sent out the questionnaire to a larger number of stakeholders, than the previous questionnaire, fewer responses were provided as part of the April 2025 update.

- 5.3 Within the questionnaire the results show that the most significant issues stalling developments were similar in Richmond as those pressures nationally, these included; discharging of planning conditions and associated staffing pressures followed by higher build costs and higher interest rates. However, previously the national housebuilder commented higher interest rates was the most significant issue stalling house building nationally and within Richmond, whereas this was not provided as a reason this time round. Some respondents highlighted other issues in Richmond including the requirement for reports in the planning process; i.e Daylight & Sunlight reports, noise reports, transport reports, flood risk information and the time and cost associated with providing these. Some respondents also recommended higher planning fees to relieve pressure on staff and enable them to make quicker decisions.
- 5.4 The next question referred to unlocking potential sites across the borough, respondents recommended increasing planning fees to bring in more staff and alleviate current staffing pressures, reviewing employment policies with a focus on optimising sites with housing, and removing the requirement for small amounts of employment floorspace to be included on sites as these often get converted to housing at a later date, resulting in the site not being effectively optimised. Other recommendations include more allocations, a better pre-application process including better communication, a targeted approach to regeneration, a clear direction with innovative thinking, allowing increased building heights and higher densities to mitigate rising costs and a positive approach to planning.
- 5.5 The respondents answered question 6 regarding key actions the Council could take to improve housing delivery in a mixed way, however the two main points highlighted in the responses included; “promotion for new housing through Council led initiatives and regeneration strategies” and “updated guidance to support interpretation of planning policy requirements, such as around character-led design guidance, design codes”.
- 5.6 It is clear there is a theme running through the answers that the development industry is still aware of the pressures on the planning team and continues to sympathise with staffing levels and pressures. However, a number of respondents maintained they would be happy to pay higher fees for a better service which included a joined up pre-application process with ideally the same officer providing comments on the pre-application as the officer determining the main application, improvements in the discharging of conditions process, reducing the number of pre-commencement conditions applied, and keeping to statutory timeframes for determining applications and discharging conditions (i.e 8 weeks for minor applications and 13 weeks for major applications). However, it is clear there are a number of pressures on housing delivery outside the Council’s control including high build costs and higher interest rates being highlighted within the responses.

6.0 Step 4 – Action Planning

Future Delivery

- 6.1 The emerging Local Plan includes a plan period of 2023-2039 of which the London Plan includes a 10 year housing target for each London Authority from 2021-2031. Within Richmond Upon Thames the London Plan housing target is 4,110 dwellings over the 10 year

period, equivalent to 411 dwellings per annum over this time period. Therefore, this housing target does not cover the whole plan period for Richmond, and once the 10 year London Plan housing target ends in 2030/31, the Council will seek to apply a target of 306 dwellings per annum, based on the Council own assessment of housing needs and site capacity, resulting in a requirement for 6,558 dwellings over the plan period, more information is provided in Appendix 1.

- 6.2 Based on the adopted Local Plan and the application of an annualised London Plan housing requirement (411 dwellings per annum) the Council does not have a 5 year housing land supply, with a supply totalling 4.93 years. This is due to a 20% buffer being applied as a result of the Council's most recent HDT result. However, based on the emerging Local Plan which as of May 2025 carries moderate weight (as determined within the Stag Brewery appeal decision by the Planning Inspector), the emerging 5 year housing land supply when applying the stepped trajectory within emerging Local Plan policy 10, includes a housing land supply of 5.51 years. The longer-term pipeline of delivery for the emerging Local Plan period is included in Appendix 1, which includes the pipeline of delivery in comparison to the 10 year London Plan housing target and the later housing target which follows.

Housing Pipeline

- 6.3 It is also important to assess the amount of housing within the pipeline. As included within the AMR dated April 2024, the estimated supply of dwellings over a 10 year period either with permission and not started, or under construction with permission, are set out below:

New Build Sites under construction	508
New Build Sites with planning permission	331
Conversion sites under construction	145
Conversion sites with planning permission	39
Conversion sites with prior notification approval	41
Non Self Contained	63
Site Allocations	2,003
Deliverable Sites	3,130
Total 10 year supply	5,520
London Plan 10 year Target	4,110

Figure 6.1 – Estimated supply over 10 year period.

- 6.4 In total the estimated supply of dwellings over the next 10 year period is 5,520 dwellings with 1,127 dwellings with extant permission and of these 653 dwellings are under construction as of 1st April 2024. This is in comparison to the London Plan 10 year target for Richmond (4,110 dwellings between 2021-31).
- 6.5 While the London Plan enables an indicative target to be rolled forward for future years beyond 2031, it is also appropriate to note that a new London Plan is expected. The Mayor of London was asked by Government, when the 2021 London Plan was being finalised, to start considering the next London Plan and how this will meet the higher level and broader

housing needs of London (including the urban uplift expected by national Planning Practice Guidance), and work with boroughs to exceed their housing targets, and has launched a Planning for London Programme to being the process of reviewing or developing a new London Plan. The consultation on the emerging London Plan, titled “Towards a new London Plan”, which sets out the direction of travel of the new London Plan, opened on the 9 May 2025, running until 22 June 2025. Although, no specific housing requirements are set out at this point in time, it sets out the Mayor’s dual priorities of delivering housing and promoting economic growth.

- 6.6 As well as the overall housing requirement, the London Plan also specifies the proportion of dwellings that should be completed on small sites, which is defined in the London Plan as being less than 0.25 hectares. The small sites target in the London Plan is set out in table 4.2 and includes a 10 year target of 2,340 dwellings. This equates to 57% of the overall housing target within Richmond being required on small sites. This figure is based on the outputs from the London SHLAA (2017) taking into account past trends in housing completions on sites of less than 0.25ha and the estimated capacity for net additional housing supply.
- 6.7 Comparing this to completion levels on small sites in previous years, Richmond has a high reliance on small sites. In the past 3 years on average 67% of overall completions have been on small sites, however it is important to note that the figures in figure 7.2 are based on the Council’s definition of small sites which includes sites of 9 dwellings or less.

Year	Small	Large	Total	% Small	% Large
2021/22	63	101	164	38%	62%
2022/23	121	20	141	86%	14%
2023/24	77	23	100	77%	23%
Total	261	144	405		
Average	87	48	135	67%	33%

Figure 6.2 – Completions on small sites.

- 6.8 Although as seen in section 2, the time lapse between gaining permission and completion is far less on small sites, small sites can often be more impacted by economic challenges outside of the Council’s control as smaller developers are less able to cope with high levels of inflation, supply shortages or quick changes in interest rates; which have been prevalent in the past few years. Therefore, the reliance on small sites could result in it being more challenging for the Council to meet housing targets in the shorter term whilst the economic climate is more turbulent, this increases the emphasis on applying a stepped target approach to the emerging Local Plan period.

7.0 Actions - What will Richmond do to improve delivery?

- 7.1 Based on the findings above including the root causes of under delivery and the responses provided by key stakeholders in the development industry, the Council have provided the following actions with the aim of improving delivery over the Local Plan period.
- 7.2 In accordance with the requirement to set out actions to improve delivery, it is proposed that Richmond Council:
1. Continue to progress the emerging Local Plan to adoption. The progress to date includes; the Examination in Public (EiP) hearings of the Local Plan which were completed in July 2024, with work ongoing throughout the summer to assist the Inspectors to produce the Main Modifications based on discussions within the EiP. The Main Modifications consultation was then held at the end of January 2025, showing clear progress on the above action. Going forwards, the Council anticipates receipt of the Inspectors' Report in Summer 2025, with adoption following in Autumn 2025.
 2. Securing Registered Provider status. As set out within the Affordable Housing Update Report (2024) in February 2024 the Adult Social Services, Health and Housing Committee approved a recommendation for the Council to apply to the Regulator of Social Housing (RSH) to become a Registered Provider to bid for grant, to acquire properties on the open market for use as temporary accommodation. The Council has now had this status confirmed which, in the short term, means that the Council can bid directly to the GLA for grant to purchase properties. The purchase of additional properties for temporary accommodation will continue to be monitored within the annual Affordable Housing Update Report and will mean affordable housing contributions obtained through S106 agreements can be focused on the provision of grant for new properties, as GLA grants will be able to be secured more readily for direct purchase of existing properties. The Council are also continuing to assess the benefits of directly delivering affordable housing in the future.
 3. Continue to report on and explore new opportunities for Housing Capital Funding to incentivise housing delivery. At present £12.4m is committed against approved capital schemes and revenue support over the next five years, with more information on specific schemes included within the [2025 Affordable Housing Update Report](#).
 4. Continue to respond to national consultations to influence national and regional policy that promotes development opportunities. During the previous monitoring period, the Council submitted a detailed response to the NPPF consultation in 2024 and recently responded to the London Plan consultation (as noted in paragraph 6.6), as well as current Government consultations including the Planning reform working paper – “speeding up build out.” This ensures that the Government and GLA consider the current issues affecting boroughs such as Richmond. The Council will continue to participate in upcoming consultations from the Government and GLA.
 5. Facilitate development opportunities by addressing site-specific challenges early. Officers from housing, planning, and policy regularly meet to identify issues and explore solutions, accelerating applications like Sheldon House, Greggs Bakery, and Barnes Hospital. Greggs Bakery has already commenced construction.

6. Continue to engage closely with developers through regular catch-up meetings to address barriers in delivering homes. Review conditions applied to planning applications to determine if additional conditions can be agreed upon during the planning stage, facilitating timely commencement of projects. This initiative aims to reduce the time between planning approval and site completion, while providing developers with a consistent approach to pre-commencement conditions within the borough. Standard conditions will be reviewed in detail when the emerging Local Plan is adopted to fully align conditions with the policy requirements of the new Local Plan.
7. Continue proactive engagement with the Greater London Authority (GLA). This includes recent involvement in the Call for Sites and the Strategic Housing Land Availability Assessment (SHLAA), which will contribute to setting new housing targets at the borough level for the London Plan. The 2024 Call for Sites was conducted as part of the Land for London SHLAA, which will be incorporated into the London Plan review. There were a limited number of submissions for sites within the borough, and officers are currently undertaking detailed reviews of these submissions in collaboration with the GLA.
8. Continue to improve engagement with the development industry, including seeking regular feedback via use of an annual questionnaire with the results published within the Action Plan. The Council again circulated a questionnaire as part of this HDT-Action plan. The Council is also in the process of organising a developer breakfast event, including local stakeholders in the development industry and Registered Providers operating in the area. This will promote joint working and collaboration between the Council and the local development industry.
9. Continue to resource and progress a programme of work to support the emerging Local Plan. The Council has developed a comprehensive Supplementary Planning Document work programme, with prioritisation of SPD updates necessary to support the emerging Local Plan. A range of SPDs, including an update of the Affordable Housing SPD, will continue to be progressed during 2025 to ensure clarity for developers and speed up housing delivery.
10. Continue to secure and retain resources within Planning to improve the speed at which applications are determined. The previous developer survey highlighted the difficulty with contacting planning officers due to their high workload. Since the previous HDT Action Plan, the Council carried out a large-scale recruitment campaign for Planning Services towards the end of 2024. This process included recruiting planning officers, conservation officers and a specialist sustainability officer to ensure applications for additional housing are able to be determined quickly. This recruitment drive has been highly successful with new officers now in post. In addition, the Council responded to the Government's NPPF consultation in September 2024 and strongly welcomed proposals to create additional resource for local authority planning teams and fee system reform to ensure fees are set at a genuine cost-recovery level. In December 2024 the Government confirmed that householder application fees would be increased at the earliest opportunity and that the forthcoming Planning and Infrastructure Bill would introduce a power for local planning authorities to be able to set their own fees based on development management service cost recovery. Once secondary legislation is in place (anticipated 2025/26), this will enable the Council to consider additional targeted

resource to ensure planning services have sufficient capacity to deal with workloads and to assist with recruitment and retention of skilled officers in a competitive market.

11. Retention of sufficient viability resources to speed up determining applications. The contract whereby viability assessments are reviewed by an external consultant ended in May 2025. Following a full tender, the process of procuring a consultant to review submitted financial viability assessments is now complete and will ensure consistency across the borough. The Council has also expanded the in-house viability support for Development Management to ensure technical expertise is in place to ensure the Council is maximising affordable housing, whilst finding solutions to enable delivery on challenging sites.

7.3 It is important to note that the actions above relate to what the Council is able to do within the bounds of the planning process, as once an application is approved there are limited impacts the Council can have on the actual delivery of dwellings. Within the Root Cause Analysis and Consultation section there are a number of issues highlighted including high interest rates and build costs that the Council are unable to address through any inhouse measures, however the Council will continue to assess applications based on their merits and supported by proactive policy decisions.

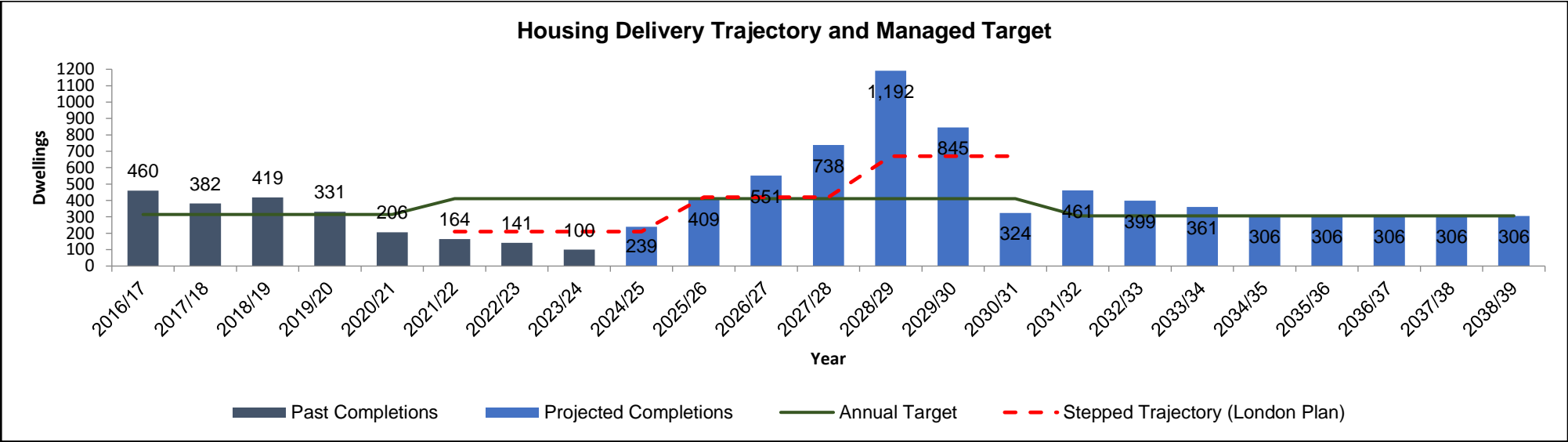
8.0 Step 5 – Implementing and Monitoring

- 8.1 The performance of the current Local Plan is already monitored within the Housing Authority Monitoring Report (AMR) [Local Plan monitoring - London Borough of Richmond upon Thames](#), Employment Floorspace Monitoring, Social Infrastructure Indicator report and the Vacancy rates in the boroughs centres, which all help to monitor the performance of current adopted Local Plan policies. These reports are produced by a specialist information and monitoring resource which sits within the Spatial Planning and Design Team. In addition to the reports above the specialist monitoring team produce an excel spreadsheet which accompanies the Housing AMR and provides detail on the housing trajectory included within the AMR. This shows the transparent nature of the Council's information to ensure relevant information on the Council's housing trajectory is readily available. The specialist team will continue to monitor the effectiveness of the Local Plan and in turn when the emerging Local Plan is adopted the performance of the Local Plan policies. These will be monitored within the AMR, including monitoring the outputs above to assess how the Local Plan policies and Actions included within the HDT Action plan are impacting on overall housing delivery.
- 8.2 One of the key metrics to determine the Council's performance in relation to providing permissions is the use of the [Planning Advisory Service 'Designation Crystal Ball'](#), which is a tool used to monitor the efficiency of the planning department by tracking planning decisions within the statutory timeframe. The Council will continue to monitor the time taken to determine applications and will provide this information within any future HDT Action Plans that may be required.
- 8.3 The Council also internally monitor lapse rates, numbers of dwellings permitted and the time taken for sites to move from approval to completion as these are key metrics to monitor performance and delivery. As a result of the findings of the HDT Action plan the Council will

continue to monitor these metrics and publish the findings as part of future AMR's to monitor delivery more closely as this will provide a useful measure to the current pressures on the development industry.

- 8.4 In addition to the monitoring of the Local Plan policies, the Council will also assess the need for additional supplementary planning documents which could improve housing delivery. A draft of an updated Affordable Housing SPD was consulted on in 2022, to reflect the adopted Local Plan. The Council will be seeking to produce a new Affordable Housing SPD once the emerging Local Plan is adopted, expected later in 2025.
- 8.5 The recent survey carried out with the development industry shows developers within Richmond are keen to engage with the Council. The Council are engaging with these contacts and their feedback has directly fed into the actions within the Action Plan. The Council will seek to carry out the survey again next year to assess whether implementation of the Action Plan has had positive results.
- 8.6 The new internal group of officers will monitor applications which have been identified as having complex issues and will aim to monitor these sites to solve issues and help progress these sites where possible. Information on the sites will be shared across teams, with actions to help deliver housing on the more complex schemes identified.
- 8.7 This Action Plan will be monitored and updated on an annual basis by the Council and published online to ensure the Council is making strides to actively improve housing delivery in the borough, whilst having the local constraints and challenges in mind.

Appendix 1 – Housing Trajectory



Appendix 2 – PAS designation crystal ball outputs 2019-2025

Majors						
	LBR Major Decisions	Major Decisions within 13 weeks	PPA, EoT or EIA Decisions	PPA, EoT or EIA Decisions in time	Out of time	Result
Jan - Mar 2019	2	1	1	1	0	100%
Apr - Jun 2019	2	0	2	2	0	100%
Jul - Sep 2019	5	0	5	5	0	100%
Oct - Dec 2019	11	3	8	8	0	100%
Jan - Mar 2020	5	2	3	2	1	80%
Apr - Jun 2020	8	4	4	4	0	100%
Jul - Sep 2020	8	3	4	4	1	88%
Oct - Dec 2020	2	0	1	1	1	50%
Jan - Mar 2021	6	1	5	5	0	100%
Apr - Jun 2021	2	0	2	2	0	100%
Jul - Sep 2021	3	0	3	3	0	100%
Oct - Dec 2021	1	1	0	0	0	100%
Jan - Mar 2022	2	1	1	1	0	100%
Apr - Jun 2022	3	0	2	2	1	67%
Jul - Sep 2022	3	1	2	2	0	100%
Oct - Dec 2022	3	0	3	3	0	100%
Jan - Mar 2023	6	0	6	6	0	100%
Apr - Jun 2023	4	2	1	1	1	75%
Jul - Sep 2023	1	0	1	1	0	100%
Oct - Dec 2023	1	0	1	1	0	100%
Jan - Mar 2024	1	0	1	1	0	100%
Apr - Jun 2024	8	0	8	8	0	100%
Jul - Sep 2024	0	0	0	0	0	100%
Oct - Dec 2024	2	1	1	1	0	100%
Jan - Mar 2025	2	2	0	2	2	100%
Total	91	20	67	66	5	95%

Non-majors						
	LBR Non-major Decisions	Non-major Decisions within 8 weeks	PPA, EoT or EIA Decisions	PPA, EoT or EIA Decisions in time	Out of time	Result
Jan - Mar 2019	682	494	180	174	14	98%
Apr - Jun 2019	649	438	162	154	57	91%
Jul - Sep 2019	628	438	166	156	34	95%
Oct - Dec 2019	550	377	162	157	16	97%
Jan - Mar 2020	576	360	195	180	36	94%
Apr - Jun 2020	570	397	160	156	17	97%
Jul - Sep 2020	554	376	163	153	25	95%
Oct - Dec 2020	547	382	145	136	29	95%
Jan - Mar 2021	640	410	209	195	35	95%
Apr - Jun 2021	640	383	208	200	57	91%
Jul - Sep 2021	689	407	252	235	47	93%
Oct - Dec 2021	651	432	164	150	69	89%
Jan - Mar 2022	636	399	202	189	48	92%
Apr - Jun 2022	619	410	171	160	49	92%
Jul - Sep 2022	659	381	220	200	78	88%
Oct - Dec 2022	548	359	141	125	64	88%
Jan - Mar 2023	580	363	165	155	62	89%
Apr - Jun 2023	602	386	168	158	58	90%
Jul - Sep 2023	548	342	172	156	50	91%
Oct - Dec 2023	564	316	185	169	79	86%
Jan - Mar 2024	554	322	182	163	69	88%
Apr - Jun 2024	530	332	142	123	75	86%
Jul - Sep 2024	549	361	129	122	66	88%
Oct - Dec 2024	523	348	144	134	41	92%
Jan - Mar 2025	402	239	146	140	23	94%
Total	14,690	9,452	4,333	4,040	1,198	92%

Appendix 3 – Developer Survey and Summarised Responses

HDT Action Plan 2025

Development in Richmond Upon Thames - RESULTS

Richmond Upon Thames Council is looking to seek views from the development industry on the current pressures on development within the borough.

Context

The Council is acutely aware of the challenge in meeting housing targets, within a challenging economic time, with limited opportunities on large sites, and numerous constraints in the borough.

More recently, we have had a change in government, with more focus on achieving growth and increasing the housing supply, inflation has stabilised, and interest rates are showing greater consistency, however, it remains a difficult climate to deliver housing, especially on more complex sites.

The Council are wanting to continue to work closely with local developers and registered providers to ascertain what the key pressures are on the development industry within Richmond and look at steps the Council could take to help improve overall housing delivery whilst providing more affordable housing to help fulfil the high level of need for affordable housing across the borough.

Since our previous survey which was filled out by a combination of Registered Providers, Developers, Agents and Planning Consultants, the Council has since recruited more planning officers into the planning department through a successful recruitment drive at the end of 2024. This was a key concern raised within the previous responses that lack of officers was creating additional delays

Questions

1) What best describes you? (please tick)

- National Housebuilder ☐ 0%
- SME ☐ 0%
- Registered Provider ☐ 0%
- Planning Agent / Consultant ☐ 25%
- Architect ☐ 75%
- Site Promoter ☐ 0%
- Self / custom builder ☐ 0%

2) What is the main issue you see as being a key staller of development Nationally? (please tick all boxes that apply)

- High Build Costs ☐ 33%
- Higher Interest rates ☐ 0%

- Availability of Labour ☐ 17%
- Planning e.g. - discharging conditions ☐ 50%
- Other (please state)

Availability of appropriate sites; lack of expertise in Planning to deal with applications in good time, objectively and subjectively; high levels of obligations required from local authorities (much larger sites/projects) inciting public unrest

3) What is the main issue you see as being a key staller of development in Richmond? (please tick all boxes that apply)

- High Build Costs ☐ 33%
- Higher Interest rates ☐ 0%
- Availability of Labour ☐ 17%
- Planning e.g. - discharging conditions ☐ 50%
- Other (please state)

My Experiences are that the Planning Department is blinkered and non-collaborative.

4) If you are a housing developer (i.e. housebuilder, SME; and RP), what is your current typical build out rate per annum in Richmond Upon Thames?

- 0 dwellings ☐ 0%
- 1-25 dwellings ☐ 25%
- 26-50 dwellings ☐ 0%
- 51-100 dwellings ☐ 0%
- 100+ Dwellings ☐ 0%
- N/A ☐ 75%

5) If you are a housing developer (i.e. housebuilder, SME; and RP), do you currently have sites with planning consent, but where you are yet to commence development?

- yes ☐ 0%
- no ☐ 25%
- n/a ☐ 75%

6) Given the limited supply of available sites in Richmond, what do you think could assist with unlocking potential sites, both large and small?

Flexible planning policies

Easier planning system

The negative approach taken by your planning officers in dealing with applications where it seems the take great efforts to find reasons to refuse planning approval rather than enabling is in our experience the most fundamental problem. There are viable sites which have limited impact that can take yes to be given to the approval. We have been working on a scheme in Hampton hill which Still has not gained planning permission with multiple applications and prior submissions for a brownfield site with it's Open Access and little impact on his neighbours. A combination of the planning department failing to meet statutory deadlines and then very poor response to applicants combines to delay the delivery of new housing by years.

More face to face collaboration between Planners and Architects/developers instead of the punitive pre-app system/meetings – suggesting, meaningful and good potential applications should be prioritised in a business-like manner to get around a table asap to try and prioritise/reach ways forward. Personal experience has now led me to believe there's a lack of expertise and applications are Refused too often – thereby letting Planning Dept 'off the hook' and having to allow Planning Inspectors, through Appeal system, to make their decisions for them

7) Which of the following actions should the Council undertake to have the greatest impact on increasing housing delivery?

- Update details on available housing sites (i.e. a regular 'call for sites') ☐ 17%
- Increase promotion for new housing through council led initiatives and regeneration strategies (i.e. town centre regeneration plan or site masterplans) ☐ 17%
- Provide updated guidance to support interpretation of planning policy requirements, such as around character-led design guidance, design codes ☐ 17%
- Increase and improve publishing of current monitoring of housing data to be more reactive to emerging issues. ☐ 0%
- Pro-actively engage with landowners/site owners where applications have been granted for a time, and not yet commenced. ☐ 17%
- Regularly communicate with developers/registered providers such as a discussion forum ☐ 33%
- Other (please state)

Rather than adopt A purely nonsensical procedural approach to development control to actually engage with developers and collaborate to find appropriate and sympathetic

methods of developing land rather than the adversarial approach that is clearly taken at the moment

- None ☐ 0%

8) What do you think could be done to lessen the time between achieving planning permission and starting onsite?

Speed in assisting clearance of conditions and enter dialogue rather than refuse
Easier planning system

Ensure that within the planning department the culture is for seeking opportunities rather than just creating a barrier against the delivery of housing which currently exercises

Much depends upon the conditions of consent and the yield for the investors of the site. There can be too many onerous conditions on one side and too much greed on the other – both sides have to compromise, both sides have to understand each other more

9) In your opinion what would be the quickest way to improve delivery across Richmond and what would improve longer term delivery?

Positive attitude

Easier planning system, force developers or owners of run down sites to do something with the land for the benefit of the community of face compulsory purchase order
More face to face expertise in the Planning Dept and less greed from developers/investors

10) Would you be keen to hear from us again and take part in further surveys or liaison?

- Yes ☐ 50%
- No ☐ 25%
- Possibly ☐ 25%

We would really appreciate your comments and feedback, and this will be provided to the planning department. Please be assured we will treat responses as confidential – any findings that will be used in future research will be generalised. We have targeted this email to reach those with known development interests in the borough – if there is someone more appropriate in your organisation or on the client side then please feel free to forward on.

Kind regards.

Richmond upon Thames Planning Policy team