Richmond Council Response to the Draft Plan Consultation 2026

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List of Acronyms

AAM – Advanced Air Mobility

AGS – Accessible Green Space

AMR – Authority Monitoring Report

APA – Archaeological Priority Area

AoD – Area of Deficiency

BAP – Biodiversity Action Plan

BFOA – Brownfield First Opportunity Area

BLG – Broad Location for Growth

BtR – Build to Rent

CAZ – Central Activities Zone

CIL – Community Infrastructure Levy

CIBSE – Chartered Institution of Building Services Engineers

EA – Environment Agency

EUI – Energy Use Intensity

GBA – Green Belt Assessment

GLA – Greater London Authority

GTANA – Gypsy and Traveller Accommodation Needs Assessment

HENPS – Heathrow Expansion National Policy Statement

HRA – Habitats Regulations Assessment

IHPS – Intermediate Housing Policy Statement

IIA – Integrated Impact Assessment

KPI – Key Performance Indicator

KWLR – Key Worker Living Rent

LGIF – London Green Infrastructure Framework

LHNA – Local Housing Needs Assessment

LIILBP – Locally Important Industrial Land and Business Park

LNRS – Local Nature Recovery Strategy

LNRAP – Local Nature Recovery Action Plan

LPG – London Plan Guidance

LSIS – Locally Significant Industrial Site

LSPBSL – Large-Scale Purpose-Built Shared Living

LVC – Local Validation Checklist

LVMF – London View Management Framework

WLWP – West London Waste Plan

MOL – Metropolitan Open Land

NPPF – National Planning Policy Framework

PBSA – Purpose-Built Student Accommodation

PDL – Previously Developed Land

PHPP – Passive House Planning Package

PMA – Property Market Area

PM2.5 – Particulate Matter 2.5 microns

PRS – Private Rented Sector

R&D – Research and Development

RP – Registered Provider

SAC – Special Area of Conservation

SAM – Sustainable Access Measure

SAP – Standard Assessment Procedure

S106 – Section 106 Agreement

SHD – Space Heating Demand

SHLAA – Strategic Housing Land Availability Assessment

SHMA – Strategic Housing Market Assessment

SIL – Strategic Industrial Location

SINC – Site of Importance for Nature Conservation

SME – Small and Medium-sized Enterprise

SPD – Supplementary Planning Document

SuDS – Sustainable Drainage Systems

TA – Temporary Accommodation

TfL – Transport for London

TPA – Thames Policy Area

UGF – Urban Greening Factor

Richmond Council Response to the Draft Plan Consultation 2026

Richmond Council welcomes the opportunity to comment on the Mayor of London's Draft London Plan ("the draft Plan"). Detailed comments and, where relevant, suggested modifications are set out below for those policies on which the Council wishes to comment.

Chapter 1 - Overview of the Plan and Good Growth objectives

Good Growth

The Council supports the continued concept of Good Growth as the overarching objective of the Plan. The Council agrees that growth should be environmentally sustainable, socially inclusive and supported by appropriate infrastructure, and welcomes the Plan's continued emphasis on making efficient use of land, improving access to housing and supporting economic growth. The Council considers that the successful delivery of Good Growth relies upon a balanced approach which also recognises the importance of environmental assets, heritage, infrastructure capacity, local character and climate resilience in shaping the scale and form of development. These themes are reflected throughout the Council's response.

Whilst the Council supports the overall streamlining and simplification of the draft Plan, it notes that a number of the dedicated policies relating to social infrastructure, health and wellbeing have been removed or absorbed into broader policy requirements. Although the Good Growth objective of creating a greener, resilient and healthy city includes commitments to improve mental and physical health and reduce health inequalities, the Council considers that these objectives are less prominent within the detailed policy framework than in previous versions of the London Plan. The Council would therefore welcome stronger and more consistent recognition throughout the Plan of the role that planning can play in improving public health, addressing the wider determinants of health and reducing health inequalities.

The Plan's approach to addressing housing need

The Council recognises the significant housing challenges facing London and supports the Mayor's objective of prioritising housing delivery within the draft Plan. The Council welcomes the draft Plan's acknowledgement that the Government's identified housing need figure for London significantly exceeds historic delivery rates and that achieving significantly higher levels of housing delivery will require a combination of planning reform, infrastructure investment, public sector intervention and wider market changes. The Council also welcomes the Mayor's recognition that housing targets must ultimately be informed by realistic assumptions regarding deliverability, infrastructure capacity and build-out rates.

The Council notes that borough housing targets are derived from a capacity-led methodology intended to deliver 558,000 homes across London over the ten-year period to 2037. The Mayor describes this figure as representing what is considered realistically deliverable during the Plan period, taking account of viability constraints, infrastructure limitations and build-out assumptions whilst also applying the draft Plan's proposed policies on optimisation, industrial land release, town centre intensification, Opportunity Areas, small sites and development on Green Belt land. However, the Council notes that environmental constraints, heritage considerations and local character can also materially influence development capacity and deliverability and should be given appropriate weight when assessing realistic development capacity. The Council also considers that good connectivity should not be

treated as equivalent to infrastructure capacity. Development assumptions should therefore be informed by robust evidence of transport capacity, network constraints and the deliverability of any infrastructure required to support growth.

Whilst the Council supports the principle of a deliverability-led approach, there are concerns regarding the extent to which some elements of the assessed housing capacity are dependent upon policy interventions and development assumptions that have yet to be demonstrated in practice. In particular, the targets appear to rely heavily on the successful operation of the Optimisation Framework, increased suburban intensification, accelerated small site delivery, industrial land release and the delivery of major transport and infrastructure interventions (some of which are not yet committed, funded or programmed for delivery).

The Council has significant concerns over aspects of the evidential basis for the borough's housing targets, including whether the capacities assumed for identified sites are realistic, whether the assumed delivery from small sites is appropriately balanced with the historic character of neighbourhoods, potential impacts of climate change including managing urban heating and flooding constraints as part of increased site optimisation, and the lack of assessment of the impacts of assumed industrial land loss on local jobs and economies. Additional evidence is required to demonstrate that these concerns have been properly considered in developing the housing targets. How the assumptions have informed borough-level targets and the degree of confidence that can reasonably be attached to each source of projected supply remains an area of considerable concern.

The Council is also concerned that the methodology does not always distinguish clearly between theoretical capacity and deliverable capacity. The existence of development potential does not necessarily mean that development can realistically be delivered within the Plan period. Constraints relating to viability, ownership, infrastructure, environmental requirements, market absorption rates and development phasing can significantly affect delivery timescales. This is particularly relevant given the draft Plan's acknowledgement that much of the longer-term housing capacity identified by the Mayor is dependent upon major transport investments, utility upgrades and strategic infrastructure which are not currently committed or funded. Further comments on these matters are provided under Policies MBUL2, MBUL5, PV5 and HN1.

Setting the target

The Council welcomes the Mayor's acknowledgement that the housing target set out in the draft Plan does not fully meet London's assessed housing need as identified through the Government's standard method, and that a balance must be struck between ambition and deliverability. The Council supports the principle that housing targets should be evidence-based and informed by realistic assumptions regarding the likely contribution of different sources of supply.

However, the Council considers that greater transparency is required regarding the methodology used to derive borough housing targets and the assumptions underpinning them. This includes the contribution expected from small sites, industrial land release, optimisation and infrastructure-led growth, together with the degree of confidence that can reasonably be attached to these sources of supply. The Council's detailed comments regarding Richmond's housing target and the assumptions informing it are set out under Policy HN1 and Appendix 1.

The Council is also concerned that the targets are based on best case scenario assumptions and that insufficient headroom has been incorporated to account for sites not coming forward within the Plan period. Without greater clarity regarding these matters, it is difficult to conclude that the targets and associated borough distributions are fully justified or capable of effective delivery over the Plan period.

Managing adverse impacts

The Council supports the principle that growth should be planned and delivered in a manner that appropriately manages impacts on infrastructure, communities, the environment and quality of life. The acknowledgement within the draft Plan that growth must be aligned with transport capacity, utilities infrastructure, flood risk management and wider social infrastructure is welcomed.

The Council considers that local constraints should continue to play a central role in informing development capacity and site optimisation. These constraints include heritage assets, environmental designations, transport and wider infrastructure capacity, flood risk and established character. Proper recognition of such constraints is important to ensuring that growth does not give rise to unacceptable adverse impacts on communities, infrastructure or environmental assets. Further comments in this regard are set out under Policies MBUL2, MBUL3 and PV7.

The Council therefore considers that housing targets should be more explicitly linked to evidence demonstrating the availability and deliverability of supporting infrastructure. This is particularly important in relation to transport, utilities, flood risk mitigation and social infrastructure. Without a clear alignment between planned growth and infrastructure delivery, there is a risk that adverse impacts on existing communities, services and environmental assets may not be adequately identified or mitigated. Further comments on these matters are provided under Policies MBUL4 and MBUL5 and Annex D.

Beyond the Planning System

The Council welcomes the draft Plan's recognition that significantly increasing housing delivery will require measures beyond the planning system alone. In particular, the Council agrees that infrastructure investment, public sector intervention, grant funding, improved development viability and measures to accelerate build-out will all be necessary if the levels of growth envisaged by the Plan are to be realised.

The Council is particularly supportive of the acknowledgement that many of the factors influencing housing delivery are outside the direct control of local planning authorities. Greater intervention may therefore be required to address stalled permissions, viability constraints and infrastructure funding gaps. The Council would welcome continued collaboration between the GLA, Government and boroughs to help unlock delivery and maximise housing provision in sustainable locations.

Chapter 2 - Making best use of land and achieving Good Growth

MBUL1 Spatial Strategy

The Council supports the continued concept of 'Good Growth' as an overarching objective of the Plan and Policy MBUL1 to provide a coordinated spatial strategy for meeting London's development needs and distributing growth in a way that supports the Good Growth objectives. In particular, the Council supports the continued prioritisation of brownfield land, the closer integration of housing and

economic development with sustainable transport and infrastructure investment, and the recognition that the location and phasing of growth must be informed by infrastructure sufficiency.

MBUL1A(1): The Council notes however that MBUL1 represents a substantial change from the spatial strategy in the adopted London Plan. The previous emphasis on Opportunity Areas and Opportunity Area Planning Frameworks is replaced by a more complex hierarchy comprising Brownfield First Opportunity Areas, Broad Locations for Growth, Strategic Growth Corridors and Environmental Opportunity Areas. This provides opportunities to encourage different forms of growth and investment, but it also introduces a more complex strategic framework. The precise relationship between the different designations, their relative priority and their implications for investment and plan-making are not always clear.

In order to be effective, the Council considers that the policy and supporting text should explain more clearly how the different components of the spatial strategy will operate together, how areas have been selected for each designation, and how the designations will influence the prioritisation of Mayoral funding, transport investment and other strategic infrastructure. This is necessary to provide certainty to boroughs, communities, infrastructure providers and the development sector, and to demonstrate that the proposed spatial strategy is justified and capable of effective delivery.

The Council supports the principle that growth should be directed to sustainable and accessible locations. However, connectivity should not be treated as equivalent to infrastructure capacity. A location may be well connected while its stations, services, utilities, schools, health facilities or public realm remain unable to accommodate substantial additional demand. Growth assumptions should therefore be informed by robust evidence of existing capacity, committed investment and the realistic funding and delivery of necessary improvements. Further detailed comments on the distinction between connectivity and transport capacity, including the use of the Sustainable Access Measure, are set out in the Council's response to Policy MBUL5 Sustainable transport to enable London's Growth.

MBUL1A(2): The Council similarly supports the objective of realising the potential of land through appropriate intensification. However, Policy MBUL1 should not be interpreted as establishing a general presumption that every accessible location can accommodate the upper levels of development anticipated by the Optimisation Framework. Development capacity must continue to be informed by locally derived evidence relating to character, heritage, environmental sensitivity, transport and infrastructure capacity, and other site-specific considerations. The Council's detailed concerns regarding the Optimisation Framework, the London Context Map and the ability of locally prepared evidence to establish appropriate densities and building heights are set out in its response to Policy MBUL2 Optimising the use of land and site capacity. Related comments concerning locally appropriate definitions of mid-rise and tall buildings are provided under Policy MBUL3 Tall buildings.

MBUL1A(3) and MBUL1B(5): In order to be effective, the Council also considers that stronger links are required between the spatial strategy and its delivery mechanisms. Policy MBUL1 identifies strategic infrastructure requirements and supports the use of safeguarding, site allocations and developer contributions. However, it does not provide sufficient clarity on the respective responsibilities of the Mayor, boroughs, infrastructure providers and developers, or distinguish adequately between infrastructure that is committed and funded and longer-term aspirations. Where the delivery of growth depends on major transport or utility interventions, the Plan should identify the necessary

infrastructure, the anticipated delivery route and the relationship between development phasing and infrastructure provision.

MBUL1B(3): Likewise, the Council considers it would be helpful to elaborate upon the interrelationship between the London Plan and areas beyond London's boundaries. This would include in relation to river corridors and managing flood risk, including that arising from the River Thames. In relation to the latter, an amendment is proposed which would reflect more accurately, for example, Figure 2.3 as it relates to the River Thames Scheme (which extends beyond the London Plan area). Further comments are provided under Policy MBUL4 Utilities, Policy MBUL5 Sustainable transport and Annex D Transport interventions.

An amendment to MBUL1B(3) is proposed below.

> Support cross-boundary coordination of opportunities where appropriate particularly along growth corridors that extend beyond London's boundary and where planned transport investment benefits a wider area. In addition, Local Plans should, where relevant, support cross-boundary coordination in managing flood risk to maximise benefits within and beyond London.

MBUL1B(5): In addition, in order to support the effectiveness of the policy there is a need to ensure that developments which come forward (whether they are site allocations or not, including on small sites/windfalls) make on-site provision of infrastructure in relation to enhancement of green infrastructure and flood risk mitigation (5) (iii) and (v) wherever feasible. The Council's view is that MBUL1 ought to be amended to ensure it is unambiguous that windfall developments and other forms of unplanned development are subject to the provisions of MBUL1(5)(iii) and (v).

An amendment to MBUL1B(5) is proposed below:

> secure through safeguarding, spatial policies, site allocations and appropriate developer contributions, the following strategic infrastructure requirements;

Notwithstanding the above, the Council wishes to express its serious concerns over the draft Plan's references to the Teddington Direct River Abstraction (TDRA) Scheme in Policy MBUL1 part B (5) (iv) and Figure 2.3, which presents the scheme as an example of strategic infrastructure required to support sustainable growth (the only specifically named infrastructure project in the entire policy). The Council has fundamental concerns over the proposed scheme, including impacts on water quality from the release of treated effluent into the River Thames, impacts on ecology and wildlife, impacts on river uses, and the impact of significant construction works on the condition and availability of vital open and green spaces within the borough. Given these impacts, the Council's view is that the scheme as proposed is likely to be incompatible with wider policies in the London Plan and, in particular, that it is not possible to rule out environmental impacts that would actively undermine the achievement of the objectives of the plan as a whole. Moreover, the scheme has not received consent and is being progressed through a separate process outside the remit of the London Plan; the draft Plan should therefore not pre-empt or prejudice the outcomes of this process, particularly where such significant concerns remain unaddressed. The Council will continue to communicate its serious concerns around the scheme through the appropriate statutory and consultation channels but considers in this case that the Mayor should review the references to the TDRA scheme as part of MBUL1 and remove these from the final London Plan.

An amendment to MBUL1B(5)(iv) is proposed below:

> waste and utilities capacity related to the scale of growth, net-self-sufficiency, healthy waterways and zero-carbon ambitions, notably: connections to new reservoirs and water transfer projects in the wider south east; ~~the Teddington Direct River Abstraction~~; heat networks and connecting transmission infrastructure within heat network zones; and energy and water-efficiency measures set out in policies MBUL4 Utilities – capacity, connectivity and resilience and GHR1 Energy-Efficiency

MBUL1B(7): The spatial strategy's approach to the Green Belt is relevant notwithstanding that no Broad Locations for Growth are identified within the borough, and no element of Richmond's housing target is identified as Green Belt or greenfield capacity. The Council supports the continued prioritisation of brownfield land and considers that all reasonable opportunities within the existing urban area should be assessed before Green Belt release is contemplated. The Green Belt performs important strategic functions extending beyond its potential contribution to development needs. These include landscape and settlement character, biodiversity, climate resilience, recreation and sport, and maintaining the separation of settlements. Any consideration of Green Belt release must remain plan-led and founded on robust borough-level evidence, including evidence concerning transport and infrastructure capacity, environmental effects and the deliverability of sustainable development. Proximity to a transport facility should not, in isolation, establish that a location can sustainably accommodate major growth. The Council's detailed comments on Grey Belt, Broad Locations for Growth, sustainable location criteria and Green Belt enhancement are set out in its response to Policy PV7 Sustainable development and enhancement of the Green Belt.

The Council is also concerned that the Plan's strategic growth assumptions and supporting assessments should properly account for cumulative recreational, ecological and air-quality effects on internationally and nationally important environmental assets. These matters are addressed further in the Council's comments on the Habitats Regulations Assessment (see Appendix 4), Policy GHR6 Trees, biodiversity and geodiversity, Policy GHR7 Green infrastructure and Urban Greening Factor, and Policy GHR8 Accessible green space.

Supporting Text 2.13: For the sake of clarity and to better reflect the contents of the 'Managing Adverse Effects' it is suggested that the wording of this paragraph is amended as follows:

> Safeguarded land is land that is not yet formally allocated; a future version of the plan will confirm further spatial development requirements in order to continue the trajectory to 850,000 homes. In the interim, it is to be protected from speculative development that could undermine its optimisation. Much will be contingent on the scoping, and development and/or identification of, for example, further transport infrastructure, existing and new flood risk assets and interventions and other work to address further mitigation of key constraints.'

MBUL2 Optimising the use of land and site capacity

The Council supports the principle that development should make the best use of land, particularly brownfield land in order to reduce pressure for development on London's green spaces.

However, the Council has significant concerns about the suitability of the Optimisation Framework at Policy MBUL2 for establishing building height and density expectations and therefore the soundness of the policy as a whole. In summary, these relate to:

- General Principles of the Approach
- Evidential Basis for Indicative Densities
- Specific Requirements of the Policy

General Principles of the Approach

By its nature, the Framework relies on strategic assumptions and broad character classifications rather than detailed local assessment, risking unrealistic optimisation expectations in areas where heritage assets, conservation areas, strategic and local views, environmental constraints, the availability and capacity of transport infrastructure, and local character fundamentally influence development capacity. The Council is particularly concerned that the Framework methodology is based on a broadly unconstrained site assumption, treating these factors as separate considerations rather than integral components of assessing the appropriate scale, form and capacity of development.

The Optimisation Framework appears to reintroduce a form of Density Matrix through prescribed height and density expectations linked to accessibility and six broad character classifications. The Council previously supported the removal of the previous Density Matrix from the current London Plan, considering that it was often too crude to be applied effectively on a site-by-site basis. There is a risk that the proposed Optimisation Framework approach could undermine design-led and place-based approaches that are necessary to respond to local circumstances. This is particularly relevant in Richmond, where an extensive historic environment, including many heritage assets, together with significant green and open space designations, requires a more nuanced assessment of site optimisation.

As a general principle, the Council is concerned that the Optimisation Framework does not properly recognise the significant and important impact that heritage assets should have on determining what optimisation means at a site level. In particular, Paragraph 2.29 suggests that the densities within the Framework have not been informed by any nuanced assessment of heritage assets including World Heritage Sites, conservation areas, listed buildings or protected views, and the policy's only qualifier on considering heritage impacts – at Part (f) in Box MBUL2 – simply suggests 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. This is also compounded by the limited nature of the extent that the SAM and context map recognise the local nuances of character setting and connectivity. The Council is therefore concerned that Policy MBUL2 as a whole may promote forms and scales of development that are harmful without appropriately recognising heritage harm as a justification for departing from the indicative ranges or explaining how the policy should interact with the relevant heritage policies in the London Plan and national policy. For these reasons, the Council considers that the policy is not sound on the basis that it is not consistent with national policy or effective. Further views on the absence of appropriate qualifiers on the basis of assessing heritage harm are elaborated on in a later section.

The Council also has some concern over the practical interpretation of the policy's ranges. The Council's view is that ranges, if used, should be interpreted as a high-level indication of the appropriate heights and densities that a site may fall within which is implied to be the case in Part (f) to Box MBUL2. However, the Council is concerned that Part (f) places excessive reliance on the potential or sensitivity of the area a site falls within, rather than assessing constraints and opportunities at a site level. The

concept of what "area" should be taken to mean is not defined, but there is a risk that this wording promotes assessing suitable heights and densities on the basis of an averaged-out understanding of a larger area's suitability for development even if the site itself has particular characteristics that mean a lower density is required to avoid harm. For example, there are many sites within town centres which include low rise listed buildings; the policy's ranges for well-connected town centres imply a minimum density of 5 storeys, but the actual appropriate height for these sites would likely need to be much lower to avoid harm. Similarly, because the Framework assesses context and connectivity at what is conceivably an area scale, there is a likelihood that applicants will promote an interpretation that the Framework has already assessed the potential of different areas and default to higher densities, irrespective of site constraints. For these reasons, if the policy is to use ranges, the Council considers that the policy should place much greater emphasis on the optimum density within a range being determined on the basis of site constraints and characteristics, rather than simply those of the surrounding area.

Evidential Basis for Indicative Densities

The Council is also concerned that the evidence base may not be sufficiently robust to justify the specific height and density thresholds proposed. The Optimisation Framework methodology[1] is based on a sample of just 36 case studies (including two in Richmond – the former Greggs site in Twickenham, and Ham Close), which have been translated into 11 typologies and subsequently applied across the whole of London. The Council is not convinced that this provides a sufficiently robust basis for establishing London-wide expectations regarding building height and density across highly varied urban contexts.

The Council also questions the reliance placed upon the London Context Map as a key component of the Optimisation Framework. Whilst the categorisation of London into six broad developable settings (A to F) may be useful at a strategic level (and represents an improvement on the three extremely broad categories previously used in the previous Density Matrix), the Council considers that it nevertheless oversimplifies London's highly diverse local character. The Council notes that the London Context Map is largely underpinned by the London Historic Character Thesaurus dataset which, at its 'Narrow Type' level, contains hundreds of detailed character classifications. The consolidation of this data into just six developable settings inevitably results in a loss of important nuance and risks masking important distinctions between places with markedly different townscape, heritage and environmental characteristics.

The Council notes that, whilst the London Context Map draws upon detailed and highly granular data, this inevitably creates potential for classification errors. The Council has identified a number of apparent anomalies within the London Historic Character Thesaurus 'Narrow Type' classifications (e.g. residential streets classified as theatres, an entire high street classified as a war memorial, and areas classified as local centres despite having little or no commercial function).

The Council acknowledges that efforts have been made to refine the data used to inform the Framework. However, these issues raise questions regarding the robustness of the London Context Map and its reliability both as a component of the Optimisation Framework and in informing other policy areas, such as residential car parking standards (draft Policy GHR11, Table 5.8). Ensuring that the

[1] The Optimisation Framework: Methodology Report

Optimisation Framework is robust and underpinned by a reliable evidence base is particularly important as the Optimisation Framework has also informed some of the 2026 London-wide Strategic Housing Land Availability Assessment (SHLAA)[2] site capacity assumptions and, consequently, boroughs' ten-year housing targets.

For example, the mock development scenario shown on page 48 of the Optimisation Framework Methodology Report, depicting an area of Hampton in Richmond, is intended to illustrate a massing scenario for a local town centre setting (Setting C) in a low-SAM location. Whilst the Council appreciates that this exercise is indicative and does not represent an actual development proposal, it notes that: (1) the location is not designated as a local centre and contains very limited commercial uses; (2) it lies within private residential garden land, a conservation area and is directly adjacent to listed and locally listed buildings; (3) it is located approximately 60 metres from a Site of Special Scientific Interest; and (4) it falls within an area identified as highly sensitive to change in Richmond's Urban Design Study. The Council considers that this example illustrates the limitations of applying broad context settings to locations with significant local sensitivities and constraints and can generate optimisation assumptions that are inappropriate to the site context.

The Council also has concerns regarding the significant reliance placed on town centre boundaries within the London Context Map methodology. These boundaries have primarily been designated to reflect an area's retail, commercial and service function rather than its physical character or built form. Whilst the Council recognises that town centres are often among the most sustainable and appropriate locations to accommodate growth and intensification, the methodology heavily relies on designated centre boundaries in classifying areas as Setting C or Setting E, meaning that functional boundaries can take precedence over local character, creating "cliff edges" in density and height assumptions at the edge of town centres, despite the methodology report stating that it seeks to avoid such outcomes.

For example, Twickenham's reclassification from a ‘District Centre’ to a ‘Major Centre’ within the town centre network (which the Council supports, as set out in its response to draft Policy PV3) means that most of the centre has been classified as Setting E rather than Setting C. Consequently, optimisation assumptions envisage building heights of between 5 and 10 storeys across most of the centre, despite significant variations in character, townscape and heritage sensitivity.

A similar issue arises in relation to Setting C, which has generally been applied to most of the borough’s District Centres, Local Centres, Neighbourhood Centres and Important Local Parades, as well as other concentrations of commercial uses and, in some cases, individual commercial premises outside designated centres. The density and height assumptions associated with this Setting C (including ranges of up to 11 storeys in some instances) is likely to be wholly inconsistent with the prevailing scale and character of these areas, particularly smaller centres and parades serving a localised role.

The Council therefore considers the reliance on town centre boundaries as a primary determinant of character classification to be inappropriate. Whilst centre boundaries may provide a useful starting point for the Optimisation Framework, they do not adequately reflect the considerable variation in character, townscape and heritage sensitivity that can exist within individual centres. The Council is concerned that the broad application of these assumptions, together with the relatively wide density and height ranges associated with each setting, could create pressure for development that is not

[2] 2026 London Strategic Housing Land Availability Assessment (SHLAA)

justified by local context, resulting in schemes that erode the distinct character of town and local centres, and the transition between centres and surrounding low-rise residential neighbourhoods.

Whilst it is acknowledged and welcomed that the Mayor's intention is for boroughs to use the London Context Map to inform more detailed borough-wide or area-specific characterisation studies, the Council considers that there remains scope to refine a number of the limitations identified before the next London Plan is published. Such refinements would help ensure that the London-wide framework provides the strongest possible foundation for boroughs to build upon through locally derived evidence and more detailed characterisation work. The Council also considers that further clarity should be provided on how the London Context Map will be maintained and updated over time to reflect evolving evidence and development across London.

Regarding the use of the Sustainable Access Measure (SAM) in the Optimisation Framework, for which detailed comments are provided at Appendix 3, the Council accepts that connectivity is an important consideration in informing appropriate site capacities. However, it represents only one component of site optimisation and must be balanced against other site-specific considerations.

Specific Requirements of the Policy

The Council notes that Part A to Policy MBUL2 allows boroughs to prepare local strategies, design guides, design codes, masterplans, site allocations and other place-based frameworks that can establish locally specific design parameters and, in such circumstances, take precedence over the Optimisation Framework. This flexibility is welcomed and reflects the importance of local evidence in shaping appropriate development outcomes. For example, the Council's adopted Local Plan[3] is supported by a comprehensive Urban Design Study[4], which assesses townscape character, sensitivity to change and capacity for growth across the borough, including opportunities for tall and mid-rise buildings. However, the draft Plan requires local evidence and design parameters to align with the wider Optimisation Framework, which may limit the extent to which boroughs can depart from London-wide assumptions where local evidence points towards different conclusions regarding site optimisation. The approach also risks placing a significant resource burden on heritage-rich boroughs such as Richmond, effectively requiring them to prepare and maintain extensive local evidence and guidance to safeguard locally distinctive character, heritage assets and valued green and open spaces from forms of development that may otherwise be supported in principle by the Optimisation Framework.

Regarding small sites under 0.25ha, the Council notes that the Mayor is currently consulting on a London Small Sites Design Code London Plan Guidance (LPG)[5] and looks forward to responding to the consultation in due course to assess whether it can respond appropriately to Richmond's distinctive local character and constraints. The Council is, however, disappointed that the LPG, which is intended to form a key component of Policy MBUL2 once the next London Plan is published, was not made available for consultation alongside the draft Plan. This is particularly concerning given that the Strategic Housing Land Availability Assessment (SHLAA) relies on anticipated policy interventions, including the LPG, to support assumptions regarding increased small-site delivery, which contributes a significant proportion of the overall borough housing target. While the LPG has now been published for

[3] Richmond Local Plan (adopted 2025) - webpage including links to the Local Plan and Policies Map
[4] Richmond Urban Design Study 2023
[5] Draft London Small Site Design Code LPG consultation (September to December 2026)

consultation, the Council remains concerned that limited evidence has been presented to demonstrate how a largely design-led initiative would translate into the level of additional housing delivery assumed within the SHLAA.

Given the importance placed on the LPG within Policy MBUL2(A.3) and (C.2), and Box MBUL2, and the clear expectation that boroughs should not depart significantly from its approach when preparing locally derived evidence and design codes, the Council has similar concerns to those raised in relation to the Optimisation Framework. Notwithstanding this concern, the Council welcomes the flexibility provided by Policy MBUL2(A.3), which allows boroughs to prepare locally tailored small sites design codes, particularly given the significant contribution that small sites make to overall housing delivery in Richmond. The Council notes, however, that the preparation of borough-specific design codes, or the making of Local Development Orders as encouraged by the draft Plan, is likely to have significant resource implications.

In relation to Part C(1) of the Policy, the Council notes that residential development is expected to meet the minimum densities of the Framework unless site specific constraints limit the development potential of the site. The Council supports this wording in principle, in that it would appear to allow boroughs to determine that the appropriate density for a site is different (e.g. lower) when considering other relevant matters, which as above, could include harm to heritage assets. However, Part C(1) goes on to state that development that complies with the Framework should be supported. This statement appears to suggest that developments that propose heights or densities that fall anywhere in the applicable range should be supported, even if that height or density is clearly harmful when considering other material factors, such as heritage impact. For these reasons and acknowledging the Council's concerns over the evidential justification for the policy above, this part of the policy is far too unqualified and risks promoting forms of development that are demonstrably harmful and inappropriate by displacing a design-led approach to site optimisation and applying the Framework densities rigidly. The Council's view is Part C(1) is therefore not sound on the basis that it is not consistent with national policy (in that it does not give appropriate weight to the importance of design and heritage impact in informing heights and density) or justified. In relation to Part C(3), the Council considers that this statement is in direct competition with the expectations of Part C(1) and the text under Table 2.1 in that it suggests developments that do not meet the applicable ranges should be refused. This could conceivably include developments where design and heritage considerations mean that even the lower limit for the applicable range is not appropriate, despite the second sentence of C(1) suggesting this is capable of being justified, or developments exceeding the heights and density ranges despite the text under Table 2.1 suggesting this may be permissible. In the absence of a qualifier relating to site-specific constraints, Part C(3) is internally inconsistent with both Part C(1) and Table 2.1 of the policy, and for the reasons stated in the previous paragraph, is not sound on the basis that is not consistent with national policy or justified.

In order to make the policy sound, the Council proposes the following amendments:

- MBUL2(A.1) - Developing strategies, design guides, design codes and/or masterplans that set clear expectations on scale, height, and form of development (and other parameters as relevant) for areas where a more pro-active approach is required to promote development. These should have regard to the Optimisation Framework in Table 2.1 and ensure that minimum net densities are met or exceeded, unless robust local evidence demonstrates that a lower

density would be more appropriate having regard to local character, context or site-specific constraints.

- MBUL2(A.2) - ...These studies should not preclude change, especially where an increased scale or density of development is expected in accordance with box MBUL2. ...These studies should help shape how growth and optimisation are realised in accordance with box MBUL2, taking into account local character, context and capacity for change.
- MBUL2(C.1) – Development should be informed by the relevant density and height ranges in the Optimisation Framework where applicable (see Box MBUL2). Residential development should achieve the minimum densities stated in the Optimisation Framework, unless site specific constraints limit the development potential of the site and/or relevant local policy, guidance or evidence support an alternative minimum density. ~~Development that complies with the Optimisation Framework should be supported in terms of height and density~~
- MBUL2(C.3) – Failure to meet the requirements of this policy should be given very significant weight in planning decisions, having regard to site-specific circumstances and other material considerations.
- Box MBUL2(e) - Identify the ~~assumed~~ indicative height range and density for a site as set out in the Optimisation Framework
- Box MBUL2(f) – Identify the area's potential and/or sensitivity to change, having regard to local character, opportunities and consideration of any site-specific constraints, to inform where in the range is optimum[20]
- Box MBUL20 Footnote 20 - Where an LPA hasn't identified an area's potential for change, considerations such as the presence of designated heritage assets, ~~such as~~ including conservation areas and/or listed buildings, non-designated heritage assets, and protected open spaces may indicate that the form and massing may be expected to be towards the lower end of, or in some cases below the relevant range.
- Box MBUL20 (Text after Optimisation Framework matrix) - It may be acceptable to exceed the heights and densities expressed in the table above, particularly in better-connected locations, subject to other relevant material considerations. Where the height range in the Optimisation Framework exceeds 30m, applicants should follow Policy MBUL3 (Tall Buildings) to identify whether the proposed height is appropriate
- Supporting Text 2.26: The appropriate density and height for development within the range will be informed by a number of factors, such as how sensitive to change an area is and site-specific constraints, including heritage assets. There may also be site-specific circumstances where achievement of the minimum density and heights within the range would cause an unacceptable degree of harm when assessed against other relevant policies, including those relating to heritage assets, which may justify a lower density or height. There may also be more granular aspects of transport connectivity and development viability than can be reflected in the Optimisation Framework that might influence form and density. Boroughs may assess certain areas as more sensitive to change, with appropriate densities potentially towards the lower end of the range, but it is not expected that this is a default position across large parts of a borough, and it must be informed by a robust assessment.

MBUL3 Tall buildings

The Council welcomes the continued largely plan-led approach to tall buildings and the requirement for boroughs to assess and identify locations that are sensitive to tall buildings. The recognition that local

planning authorities should define appropriate locations, boundaries and height parameters based on local evidence is strongly supported. However, the Council notes that, unlike Policy D9 of the London Plan (2021), draft Policy MBUL3 introduces greater scope for tall building proposals to be considered outside locations specifically identified through the development plan process. This risks diluting the role of locally prepared evidence and reducing certainty regarding where tall building development will be considered appropriate.

The Council objects to the introduction of a London-wide 30 metre threshold for defining a tall building. Richmond's adopted Local Plan, supported by a comprehensive Urban Design Study, identifies a number of locations where taller buildings may be appropriate (see Appendix 3 of the Local Plan). However, none of Richmond's tall building zones are identified as suitable for buildings exceeding 30 metres in height. The Council considers a universal 30 metre threshold to be inappropriate, as what constitutes a tall building is inherently context specific. In particular, the criteria at Box MBUL3 places considerable emphasis on growth potential, transport accessibility and existing or emerging character, but do not adequately reflect the full range of local constraints and sensitivities that may justify a more restrictive approach to building height. A building that may not be regarded as tall within a highly urbanised Inner London location could be a prominent and visually intrusive feature within the lower-rise and more sensitive townscapes that characterise much of Richmond.

Within Richmond, a tall building is defined as a building of 7 storeys or more, or 21 metres or more in height, whichever is lower. The Council is concerned that where local evidence identifies few, or no, locations as suitable for buildings above 30 metres, proposals may nevertheless come forward in areas where such heights have not been identified as appropriate. In these circumstances draft Policy MBUL3(A.2) and (A.3) would allow the suitability of locations for development proposals above 30 metres to be assessed against the extremely limited criteria set out in Box MBUL3. The Council does not consider these criteria, in isolation, to provide a sufficiently robust basis for assessing the appropriateness of locations for tall building proposals in a borough such as Richmond, where an extensive historic environment, numerous designated and non-designated heritage assets, strategic and local views, river corridors, and extensive green and open space designations mean that many locations are inherently sensitive to height. The Council also notes that the detailed assessment framework currently contained within London Policy D9(C) has not been replicated in draft Policy MBUL3, with several matters, including servicing, infrastructure capacity, daylight and sunlight impacts, wind effects, air quality impacts and cumulative impacts, no longer explicitly addressed within the tall building policy itself. The Council is concerned that this represents a reduction in the breadth and clarity of the assessment framework that currently applies to tall building proposals.

Similarly, the Council objects to the proposed definition of mid-rise development as buildings between four and nine storeys. This differs significantly from Richmond's adopted Local Plan, which defines mid-rise buildings as those of 5 storeys or more, or 15 metres or more in height (whichever is lower), provided they do not meet the tall building threshold. Consequently, buildings at the upper end of the proposed mid-rise definition range would currently be regarded as tall building development in Richmond. Whilst the Council recognises that mid-rise development has an important role in meeting London's housing needs in appropriate locations, the proposed definition, together with its promotion through the Optimisation Framework (which includes indicative height ranges likely to exceed 30m for some combinations of SAM and Context Setting) risks normalising building heights that would be considered substantial and, in many locations, highly inappropriate.

The Council is disappointed that the draft Plan does not recognise the role of locally defined mid-rise zones, with such development instead largely subsumed within the Optimisation Framework in Policy MBUL2. The Council recognises that flexibility (as opposed to rigidity) can sometimes be beneficial when considering the suitability of a proposal in its context. However, the Council's view is that the existing plan-led approach to identifying mid-rise zones does not preclude flexibility in that developments for mid-rise heights outside of identified zones are still capable of justification in certain circumstances, with the presence of mid-rise zones promoting a degree of certainty for developments in those areas. However, to omit plan-led mid-rise zones entirely risks reducing certainty, diminishing local discretion over mid-rise building height and failing to have regard for the benefits of a more nuanced, evidence-led approach such as that established through Richmond's adopted Local Plan and supporting Urban Design Study.

Suggested modifications:

- The Council notes the lettering at Policy MBUL3 requires updating as 'A' is repeated twice under plan-making and development management.
- PM MBUL3(A.2) - identify the locations that may be appropriate for buildings of 30m and above in height (or at a higher or lower threshold if locally appropriate) using the criteria in Box MBUL3 and assessment carried out as part of A(1)
- DM MBUL3(A.3) - Where a plan-making authority has not identified appropriate locations for tall buildings in their local plan, or if a tall building is proposed outside of a location identified in a local plan or in Table 2.2, tall buildings should not normally be supported. Any exception should only be considered where the borough's Local Plan explicitly provides criteria under which such development may be considered acceptable. In addition, the criteria 1~~(ii) and (iii)~~ (i-iv) (and for buildings over 100m also criteria 2 (vi) and (vii)) in Box MBUL3 should be considered when determining if the location is acceptable in height terms. Robust justification is expected for any conflict with locally defined criteria, and with the criteria set out in Box MBUL3 ~~these~~ criteria.
- DM MBUL3(A.4) - Development proposals of 30m and above in height (approximately 10 storeys and above), or above a lower locally-defined threshold where identified in Local Plans, should meet the following criteria:
- DM MBUL3(A.4.ii) - Make a positive contribution to the existing and emerging skyline where a building is prominent and not cause unacceptable harm to local or strategic views, including local views across borough boundaries.
- Box MBUL3 criteria 1(ii) - have very good sustainable transport connectivity (generally assumed to be SAM 4 or above, but subject to a site-specific assessment of connectivity)
- Box MBUL3 criteria 1(iii) - are not unduly sensitive to the impacts of tall buildings, of the envisaged scale having regard to relevant heritage, townscape, environmental and other constraints
- Box MBUL3 criteria 1(iv) - have an existing or emerging townscape character that ~~can in principle~~ may be capable of accommodat~~e~~ing tall buildings

MBUL4 Utilities – capacity, connectivity, and resilience

The Council supports the overall approach to Policy MBUL4, recognising the importance of ensuring that utilities capacity, connectivity and resilience keep pace with planned growth. In particular, the Council supports the greater emphasis on identifying infrastructure deficiencies, requirements and opportunities at an early stage of plan-making, and on reflecting these within spatial strategies, site allocations and design policies. The introduction of the principle 'strategic sufficiency' appropriately

recognises that utilities infrastructure should be considered as an integral part of spatial planning and growth delivery, rather than solely as a technical matter at the development management stage.

For Richmond, the policy is particularly relevant given the importance of ensuring that water, digital, and other utility infrastructure have the capacity and resilience to keep pace with planned growth, whilst recognising that the delivery and upgrading of utilities infrastructure can be constrained by the borough's extensive historic environment. The Council welcomes the recognition within the supporting text (paragraph 2.67) that heritage and other place-based considerations can affect the delivery and upgrading of utilities infrastructure. In a borough, such as Richmond, where there are a significant number of conservation areas, listed buildings, and other heritage assets, careful consideration will be required to balance infrastructure improvements with the conservation of local character and heritage significance.

However, the Council considers that the policy should recognise the practical challenges for boroughs in maintaining sufficiently up-to-date information on utility capacity and infrastructure requirements. Much of this information is held by regulated utility providers and other infrastructure operators, over whom the borough has limited influence. The policy should, therefore, make clear that expectations on local planning authorities to demonstrate strategic sufficiency should be proportionate to the information reasonably available to them and supported by timely and effective engagement from utility providers and infrastructure coordinators. The Council strongly encourages the Mayor to work with providers to secure improved access to utility and infrastructure data for all boroughs to support effective plan-making and infrastructure planning.

The Council also considers that further clarity would be beneficial regarding the delivery and funding of infrastructure identified through the policy. In particular, where strategic infrastructure requirements arise from planned growth, the Plan should clarify the respective responsibilities of the GLA, boroughs, infrastructure providers and developers, including how any developer contributions towards strategic utilities infrastructure are expected to be identified and secured. In particular, the Council notes that Part B refers to development proposals "contributing positively" to utilities infrastructure but then goes on to define this as relating to incorporating demand and supply measures and providing information. The phrasing "incorporating demand and supply measures" appears to imply delivering physical capacity, and whilst it does not necessarily preclude other forms of contribution (such as financial contributions or the provision of land for utilities infrastructure), it risks creating doubt as to the requirement for development proposals to do so. These contributions are important both to ensure developments are sustainable and liveable and that requirements are deliverable and do not place disproportionate additional burdens on development, particularly where infrastructure requirements may have significant implications for viability. The Council therefore suggests that Part B(1) is amended to include the following:

- B (1) incorporate appropriate demand management, supply and distribution infrastructure and other measures (to relevant minimum standards where specified) to meet system needs, informed by relevant information and strategies including, where appropriate, engagement with providers or coordinators, and provide any other proportionate and necessary contributions required to support the delivery of utilities infrastructure, including where appropriate the provision of land, easements safeguarding measures, or financial contributions secured through relevant mechanisms.

The Council further considers that while the Policy appropriately promotes the provision and upgrading of utilities infrastructure, it currently places limited emphasis on the retention and protection of existing assets. The Council considers that Part A of Policy MBUL4 should be amended to include an explicit requirement to safeguard existing utilities infrastructure, operational sites and associated land where these are necessary to maintain capacity, resilience and support planned growth. The Council recommended a specific criterion on safeguarding is added to Part A of Policy MBUL4 to provide greater certainty that strategically important infrastructure is not compromised by redevelopment pressures and would support the long-term resilience of utility networks. Part A should therefore be amended to include the following third criterion:

- A (3) safeguard existing utilities infrastructure, operational sites and associated land that are necessary to maintain or enhance network capacity, resilience and the delivery of planned growth.

MBUL5 Sustainable transport to enable London's Growth

The Council supports the overall objective of MBUL5 to ensure that transport enables London's growth in a sustainable manner and welcomes the stronger integration of transport considerations within the Plan's wider objectives for growth, climate change, health and the environment. The Council notes the shift away from a standalone transport chapter in the adopted London Plan and supports the greater integration of transport considerations within the Plan's wider growth strategy. The Council considers that this integrated approach is appropriate, subject to transport remaining a fundamental consideration in determining where and how growth can be accommodated.

Part A of MBUL5 requires boroughs to identify transport interventions as part of their local plans. Whilst understanding the concept, the Council is concerned that the wording in Part A may be too abstract or loose to be effective, in that terms such as "housing and economic potential" have no defined meaning. Because of this, the phrasing of Part A could be seen to place an emphasis on transport interventions creating theoretical capacity for development (which may be true of some interventions), rather than those that could facilitate specific development opportunities.

In this context, the Council considers that Policy MBUL5 should place greater emphasis on the relationship between the scale and location of growth, existing transport capacity and timely delivery of transport infrastructure. Good sustainable transport accessibility and connectivity should not, in themselves, be taken as evidence that existing transport infrastructure has sufficient capacity to accommodate additional growth. Development capacity should, therefore, be informed by robust evidence of transport capacity, network constraints and the realistic deliverability of necessary transport improvements. Where additional infrastructure is required to support growth, there should be greater certainty that it can be funded and delivered alongside and by development in a timely manner. This also needs to be understood in the context of wider changes in the planning system, including forthcoming plans for temporary relief of borough-level CIL, which is likely to significantly deplete a source of funding that has historically contributed significantly to transport infrastructure improvements.

The Council support the continued emphasis on reducing reliance on private vehicles and increasing walking, cycling and public transport use. However, the Council considers that the policy should recognise the significant variation in transport accessibility and travel patterns across London and allow for local circumstances, including areas where public transport provision and opportunities for

modal shifts are more limited. For many living in less connected areas and some key workers, the use of a car is necessary, and the Plan should acknowledge that even if London-wide targets to reduce the proportion of journeys by car are achieved, there will still be millions of journeys using private motor vehicles. The Council also considers that freight, servicing, and construction activity should be more explicitly recognised as part of planning for sustainable growth, given the significant implications these activities can have for the operation of streets, public spaces and transport networks. It is considered that servicing arrangements, particularly for larger developments, should, be accommodated within development sites rather than relying on the public highway. The use of the highway for servicing and other development generated transport (e.g. home deliveries, micro-mobility) reduces the extent to which the highway is available to help maintain the free flow of motor traffic, buses and cyclists whilst adversely impacting the ability to provide continuous bus and cycle lanes or widened pavements.

The Council notes the introduction of the Sustainable Access Measure (SAM) and its application within the wider Plan, including the Optimisation Framework. However, SAM should not be relied upon as a proxy for transport capacity or the ability of existing infrastructure and services to accommodate additional demand. Assessments of development capacity should continue to be informed by detailed local evidence of transport capacity, operational constraints and the deliverability of necessary improvements, particularly where higher densities or significant levels of growth are proposed. The visual representation of SAM appears to show parts of the borough as having a high degree of connectivity which the Council would dispute – the methodology used must be transparent and robust. See Appendix 3 for detailed comments on the Sustainable Access Measure and its methodology.[6]

The Council considers that particular care is required in applying SAM within Richmond and that a London-wide connectivity measure should not result in development capacity being increased without sufficient consideration of local transport constraints, environmental considerations and the ability of existing and planned infrastructure to accommodate additional demand. Site-specific and locally derived evidence should therefore continue to inform decisions on the appropriate scale and density of development alongside SAM. The Council is concerned that SAM may be (mis)used to justify development without transport mitigation. The Council will continue to support and require improvements to walking, cycling and public transport connectivity while ensuring that the scale and location of growth is aligned with the capacity of transport infrastructure and the character of local places.

Overall, the Council supports the direction of Policy MBUL5. However, the supporting text should provide greater clarity that SAM is a measure of connectivity rather than transport capacity, and that decisions relating to the scale and intensity of growth should continue to be informed by local evidence on transport capacity, operational constraints and the deliverability of infrastructure improvements. The supporting text should also place greater emphasis on the relationship between growth, infrastructure delivery, transport capacity, and local circumstances.

MBUL6 High quality design for a growing, changing city

The Council supports the overarching objective of Policy MBUL6 to secure high quality, and climate resilient design across London. The policy appropriately supports growth and intensification,

[6] The Sustainable Access Measure (SAM) Methodology Summary Report: V1 can be downloaded from the London Plan evidence webpage, under "Making the best use of land and achieving Good Growth"

acknowledging design quality plays an important role in ensuring that development responds positively to local character, supports wellbeing and is climate resilient. The Council particularly welcomes the policy's emphasis on climate adaptation, local distinctiveness, neighbourhood amenity and appropriate mix of uses.

However, the Council believes that the policy should place greater emphasis on and explicitly recognise that high-quality design must respond to London's changing demographic profile. London's population is ageing, creating increasing demand for environments that support independence, mobility, social interaction and healthy ageing. The wording of the policy should explicitly recognise and respond to these challenges.

In addition, the Council notes that the proposed climate change risk modelling requirements under A(2) do not specifically address flooding from all sources. For effectiveness, a modification is proposed below.

Suggested modifications:

- A(1) promote good design that reflects growth, demographic change and population health ~~and change~~ needs via the use of design codes and guidance in line with Policy MBUL2
- A(2) use the latest climate change risk modelling alongside flood risk modelling from all sources to inform site allocations, spatial policies and design specifications in order to create resilient and adaptive places

The Council supports in principle Part A(1), which promotes the use of design codes and guidance to help deliver good design outcomes. However, this clause requires more flexibility to consider alternate options for plan-making authorities to promote good design other than design codes. There should remain flexibility for boroughs to determine where design coding is the most appropriate approach and where other forms of design guidance may be better suited to local circumstances.

The Council also supports criterion B(1), which places emphasis on local distinctiveness and responding positively to the character of a place. The Council supports the recognition of the importance of responding to local character and distinctive features within paragraphs 2.93 and 2.94, which is of particular importance to Richmond. Furthermore, the policy acknowledges that design quality goes beyond the visual appearance of development and ensures that early consideration can help shape the environmental performance of buildings and enjoyment of public realm.

The Council strongly supports the requirement for plan-making authorities to use the latest climate change risk modelling and supports the increased emphasis placed throughout the policy on climate resilience and adaptation. The requirement for Local Plans and development to be informed by and designed to consider future climate conditions and risk will ensure that future development is resilient and risk to residents is minimised. These requirements reflect the growing need for the built environment to adapt to increasing temperatures and more frequent extreme weather events. However, the Council considers that further guidance may be useful regarding the implementation of criterion B(8) and the balance between climate adaptation measures and any potential harm to heritage or character.

MBUL7 London's Heritage

The Council supports the continuing high priority given to protecting London's heritage assets and historic environment in MBUL7, and the contribution these assets make to London's status as a world-

class city. The refocusing of the London Plan on a strategic approach to London's heritage assets, particularly the four World Heritage Sites, is noted. The borough has strong policies in its Local Plan relating the historic environment, which along with the National Planning Policy Framework (NPPF)[7], provide a robust framework for considering applications that may impact on its heritage assets.

The requirement in part C of the policy for boroughs where development within the setting of a World Heritage Site may affect its significance to include policies in their development plans is strongly supported. Royal Botanic Gardens, Kew is located within Richmond borough and is the subject of a separate, detailed policy in the Richmond upon Thames Local Plan to ensure that the World Heritage Site, its buffer zone and its wider setting is protected and enhanced to conserve its Outstanding Universal Value. However, while the borough has been able to develop its own strong policy framework in relation to the World Heritage Site (WHS), there has been found to be significant potential for harm to be caused to the WHS by inappropriate developments within its setting and the surrounding area, within boroughs that do not have their own specific policy.

It is considered that the Implementation text in paragraphs 2.99 to 2.102 could be made stronger by setting out a clear expectation that applications and pre-application proposals consult with boroughs, steering committees and owners/responsible bodies early on to identify and mitigate risks to the Outstanding Universal Value of WHSs. In addition, where there are likely to be visual impacts on the Outstanding Universal Value of a WHS, reliance on existing trees or vegetation for screening or mitigation of harm should be given only limited weight, due to the risk that trees and screening can change over time, if trees die or are felled - especially if the trees in question are outside of the control of the applicant. Many mature trees across London are expected to die as a result of climate change and disease over the next few years, so there is a real possibility of views become more sensitive to change as trees are lost. Compensatory planting with more drought- and heat-resistant specimens will take decades to mature.

Part E of the policy which encourages boroughs to bring forward design codes, Local Listed Building Consent Orders and/or LDO to provide clarity and certainty about appropriate alterations to historic buildings is supported in principle, including in relation to the flexibility around the wording in the policy. The borough's experience of bringing forward this type of guidance is that it can be a significant resource ask that can be prioritised as resources allow.

The wording in part G of the policy should be amended (see below) to make it clear that measures to improve energy efficiency will be supported, but that consideration of harm to the significance of the heritage asset, including its functionality, should be given substantial weight.

Suggested amendment to Policy MBUL7 part G:

- G. Where the following measures are proposed on heritage assets, they should be supported where such measures do not cause harm to ~~achieve an appropriate balance with conserving~~ the significance of the heritage asset:
  (1) improvements to the energy-efficiency of a building
  (2) decarbonisation of energy sources
  (3) installation of renewable microgeneration

[7] National Planning Policy Framework

(4) measures to minimise overheating.

The borough is developing its own detailed guidance on retrofitting historic buildings to complement the Historic England guidance.[8] It is suggested that further text could be added to the implementation text in 2.102 to state that local authorities should also consider producing local guidance where this would assist applicants in planning for appropriate measures.

Suggested amendment to paragraph 2.102:

- Applicants and local authorities are encouraged to use the latest Historic England guidance. Local authorities should also consider producing local guidance where this would assist applicants in planning for appropriate measures.

MBUL8 Inclusive design

The Council is supportive of draft Policy MBUL8 and overall and the additional clarity provided within the policy, in comparison to London Plan 2021 Policy D5. However, the existing Policy D5 includes stronger wording in Part B, stating that "*Development proposal (sic) should achieve the highest standards of accessible and inclusive design…*". This language appears to be softened in draft policy MBUL8 to "*Development proposals should contribute to an inclusive built environment…*". The Council is concerned that this represents a weakening of policy ambition in relation to accessible and inclusive design. It is unclear why the explicit requirement to achieve the highest standards of accessible and inclusive design has been removed, and whether this could lead to less consistent outcomes in practice. It is recommended that the wording of 2021 London Plan Policy D5 is reinstated, for example it could read as: "*Development proposals should achieve the highest standards of accessible and inclusive design and contribute to an inclusive built environment, achieving the following criteria:*".

Another concern the Council has about the policy overall is that it is too focussed on level access, egress and communal circulation spaces. The Council is supportive of the requirements around evacuation lifts, but the policy overall is too focussed on lifts, when there are many other accessibility issues within a building to consider. At a minimum, other physical disabilities that do not necessarily require level access, for example residents that are blind or partially sighted, or deaf or hard of hearing, should be explicitly cited within the policy and supporting paragraphs, including requirements that eliminate the disabling barriers that these residents face. Policy MBUL8 would be further improved if disabilities and inclusivity challenges beyond physical disabilities were also considered – for example, residents with learning disabilities or neurodivergence. At minimum, this could include the requirement for developers to consult with access professionals at the earliest possible stage in the development process, such as a specialist housing occupational therapist or access consultant accredited by the National Register of Access Consultants. The Council considers that the rationale should include a clear definition of what constitutes an inclusive built environment and does not just rely on the reader to read the glossary for this, as all too often users of the London Plan (for example developers) will not read the "extra" sections, such as a Glossary. The Council supports the wording used in the glossary definition, but suggests the same wording is used in the rationale that follows the policy. It would be beneficial for the definition to include that inclusive design should address the needs of people with diverse disabilities, children, older people, people living with dementia, neurodiverse populations and

[8] Adapting Historic Buildings for Energy and Carbon Efficiency: Historic England Advice Note 18 (February 2026)

people experiencing temporary mobility limitations. The Council considers that the following is also added to the rationale: "A broader understanding of inclusion would ensure developments support the full diversity of London's population and future demographic change".

MBUL8(B.2): "*Are convenient and welcoming with no disabling barriers*" is overly vague wording for a development plan policy and offers no clear parameters as to what "no disabling barriers" means in practice. Even if not exhaustive, the policy should include example of measures as to how to ensure there are no disabling barriers, for example the inclusion of level access thresholds throughout all communal areas and the inclusion of tactile flooring where appropriate.

MBUL8(B.2): "*independent and safe access and egress without additional undue effort or separation*" is rather subjective – it is left open for the developer to decide what "undue effort" constitutes. If there is a professional opinion or standard as to what undue effort is, as is suggested in supporting paragraph 2.112, then this should be made clear within the policy wording.

MBUL8(B.3): The wording of this part is confusing and unclear. Suggest rewording to: "In all new buildings of any height where lifts are installed, ~~as a minimum at least one lift per core that includes a lift~~ at least one lift within each core should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building."

MBUL8(C.2): This part of the policy goes someway to address the lack of the overarching requirement for developments to "achieve the highest standards" of accessible and inclusive design, as addressed in an earlier comment – however, by only including the requirement to detail what best practice standards have been applied as a sub-part to MBUL8(C), then it only applies if a Design Access Statement (DAS) is submitted. The Council believes the requirement in this part of the policy should apply whether or not a DAS has been submitted. The Council supports the requirement to detail of what design guidance documents have been applied to the proposal; however, this should be accompanied by a suggestion (for example, within supporting paragraphs) of which guidance documents should be followed. This has been included in the supporting paragraphs of Policy D5 of the existing London Plan (paragraph 3.5.12).

MBUL8(C.3): The Council is very supportive of the requirements in this part of the policy.

Supporting paragraph 2.110: The Council is supportive of this statement, however, is not reflected in the requirements of this policy. For example, neither within the policy nor its supporting paragraphs is there any mention of blind or partially sighted residents or deaf or hard of hearing residents, or any solutions to the disabling barriers such residents face within buildings. It therefore feels ingenuine to include in paragraph 2.110 that "*it is important that all Londoners are able to access and enjoy the homes, places and opportunities it offers…*". At minimum, there should be a requirement within the policy for new buildings to include a fire alarm system that is appropriate for the deaf and hard of hearing and infrastructure in place for the blind or partially sighted to safely egress a building.

MBUL9 Healthy streets and public realm

The Council supports the overall approach to draft Policy MBUL9 and welcomes the integration of Healthy Streets and the public realm considerations within a single policy. The policy largely builds on the established approach of Policies T2 (Healthy Streets) and D8 (Public Realm) in the adopted London Plan, while placing greater emphasis on ensuring that development contributes to welcoming, inclusive, safe, accessible, and high-quality streets and public spaces. This approach aligns with the

Council's local priorities and corporate strategies for promoting active and sustainable travel, improving health and wellbeing and creating attractive and inclusive places.

The Council supports the requirement for development to provide, facilitate or contribute towards high-quality walking, cycling and public transport connections, including links to wider active travel and public transport networks. The Council considers that where development generates additional demand on the public realm, the necessary improvements should be identified at an early stage of the planning process and should be proportionate to the scale and impacts of development. Improving connectivity for walking and cycling is particularly important in supporting healthy and sustainable travel choices and reducing reliance on private vehicles.

The Council welcomes the emphasis on inclusive, safe and accessible public realm and supports the continued application of the Healthy Streets Approach. However, whilst, the policy places significant emphasis on outcomes such as safety, comfort and inclusivity, it is not always clear how these considerations should be assessed, evidenced, or incorporated into the design and planning process. The Council considers that the supporting text could provide greater clarity on how the Healthy Streets principles should be translated into design solutions, and how applicants should demonstrate that proposals will deliver improvements in the quality, safety and useability of the public realm. This would assist in ensuring a more consistent application of the policy and provide greater certainty for applicants and decision-makers.

Given the varied character and accessibility of the borough, the Council considers that the application of the Healthy Streets approach should respond appropriately to local circumstances and differing opportunities for sustainable travel across Richmond. Public realm improvements should be sensitive to local context, including the borough's town centres, residential neighbourhoods, historic environments, open spaces, and riverfront areas. The Council supports part D which recognises that major development proposals should be expected to maximise opportunities to enhance the public realm and create attractive, connected and inclusive spaces that deliver benefits beyond the boundaries of the development site. The design and management of streets and public spaces should appropriately balance the needs of pedestrians, cyclists, public transport, servicing, emergency access and other essential parts of the public realm, while supporting the creation of healthy, inclusive and attractive places.

The Council supports the objective of MBUL9(C.4) but is concerned that it represents a weakening of the approach previously set out in London Plan Policy S6. Whereas Policy S6 required large-scale publicly accessible developments to provide public toilet facilities, Policy MBUL9(C.4) only requires toilets to be available within the vicinity, with supporting text indicating that new provision will not always be required. The Council considers that accessible public toilet provision, including 'Changing Places' facilities where appropriate, plays an important role in supporting inclusive access to public spaces, active travel and healthy lifestyles, and notes that these principles are reflected in Policy 51 of the adopted Richmond Local Plan.

Suggested modification to MBUL9(C.4):

- MBUL9(C.4): …ensure free, accessible and well-maintained toilets, including 'Changing Places' where appropriate, and drinking water fountains for public use are available within the vicinity or are co-located with other facilities in the public realm. Major publicly accessible developments

expected to provide such facilities unless it can be demonstrated that adequate provision already exists within walking distance.

- Paragraph 2.118: Developments that provide significant new public realm ~~are not expected to provide public toilets and drinking water fountains~~ should provide public toilets and drinking water fountains where appropriate, having regard to the scale, nature and expected use of the development. Where there are agreements in place, visibly displayed, for free use of toilets and water fountains within walking distance, ~~new provision may not be required~~ this may be taken into account in determining whether additional provision is necessary.

MBUL10 Security and safety

The Council supports the objective of Policy MBUL10 to ensure that buildings and places are designed for security, safety and resilience and welcomes the strengthened emphasis on the safety of women, girls and other vulnerable groups. The recognition of these issues reflects the importance of creating inclusive, healthy and successful places and aligns with wider design and community safety objectives.

The proposed policy aims to simplify and reduce existing strategic policy requirements currently contained within London Plan (2021) Policies D11 (Safety, Security and Resilience to Emergency) and D12 (Fire Safety). While the consolidation of policies may improve usability, it risks lacking clarification when considering safety during the design process.

The Council strongly supports criterion B(1), which explicitly requires development proposals to consider safety and security measures for women and girls and other vulnerable groups. This represents positive improvements beyond existing policy and reflects the importance of development which feels safe and accessible for all users.

The Council supports requirements that put the onus on the developer to assess fire safety rather than planning officers. The Council supports the recognition given in the supporting text that planning officers are not experts in fire safety, and because ensuring buildings are safe from the risk of fire is of great importance, it is particularly important that those assessing risk are qualified to do so. Inclusion of feedback from a fire safety engineer on the design of buildings to reduce risk of and spreading of fire within the design and access statement will help ensure that fire safety is integral to the design process. Furthermore, this will ensure that fire safety is considered by fire safety engineers during the design process rather than put the requirement on planning officers to check the details within fire statements. The Council also supports the requirement of C(2) which ensures that no combustible materials are used within buildings of any height.

However, the simplified policy removes wording which is explicit that fire safety should be considered from the outset, by integrating design features at the earliest stage. Policy wording and the supporting text should be explicit to ensure that fire safety measures are considered from the outset and throughout the design process, rather than being considered by a fire safety engineer after the design is complete.

The proposed policy aims to ensure that fire safety standards are met in line with the Government's Approved Document B[9], whilst going further than Approved Document B on certain matters. It is noted

[9] Fire safety: Approved Document B (MHCLG)

that London Plan (2021) policy D12 was more explicit about fire safety requirements for all development proposals by setting out detailed requirements. Removing the detailed requirements from the policy means that it may be less clear for applicants what they should consider when designing safe buildings. Furthermore, it is not made clear why Part C of MBUL10 only applies to major developments involving residential uses or uses within purpose groups 1 and 2 as defined in Approved Document B; whilst it may not be necessary to exceed the requirements of Approved Document B for certain less vulnerable uses, it is the case that principles in Part C, such as avoiding the use of combustible materials in external walls, would appear to be equally justified in relation to non-major residential developments.

The Council also notes that London Plan (2021) Policy D11 currently requires development proposals to maximise resilience and minimise risks arising from fire, flooding, extreme weather and other hazards identified within the London Risk Register. These broader resilience considerations have been largely removed from MBUL10 and are now considered in other parts of the draft Plan. Given the increasing impacts of climate change, including wildfires, and the need for development to be resilient to extreme weather events, the Council considers that there is merit in retaining policy references to resilience and emergency preparedness. Whilst some of these issues, such as heat risk, are addressed elsewhere in the draft Plan, the Council would support additional text ensuring that physical risks from extreme weather and fire are considered.

The requirement for plan-making authorities to consider Health and Safety Executive hazard zone mapping is supported. However, further guidance would be helpful regarding the application of this requirement to site allocations and local plan preparation, particularly in constrained areas where strategic growth and regeneration objectives may need to be balanced against existing infrastructure constraints.

Chapter 3 - Delivering the homes and neighbourhoods Londoners need

HN1 Increasing London's housing stock

The Council supports the principle of the Plan's capacity-led approach to setting housing targets across London, and the decision not to apply the standard method figure directly, which would bear no relation to realistic levels of delivery, or even to those achieved in stronger market conditions. It is critical for the soundness and deliverability of the London Plan that the housing target set for individual boroughs strikes the correct balance between ambition and deliverability, having regard to the best available evidence on capacity and viability. Unachievable targets will inevitably mean a greater number of boroughs being subject to the presumption in favour of sustainable development and/or Housing Delivery Test sanctions, undermining the plan-led system and leading to an erosion of development quality over time.

The Council welcomes the fact that its housing target is expected to be delivered entirely on brownfield land, as this aligns with national policy and the strategy of its own local plan. The Council considers it important that development makes the best and most efficient use of brownfield land to meet development needs and that the green spaces within the borough continue to be subject to strong protections in recognition of their multi-faceted benefits, including for nature, recreation and the wider environment.

In Richmond, the housing target within the draft Plan is 5,397 dwellings over the London Plan period, equivalent to 539 dwellings per annum. This represents a very substantial 31% increase on the borough's current target. The Council is highly committed, through both its Local Plan and Local Growth Plan, to increasing housing delivery and ensuring that the most needed types and tenure of homes are delivered within the borough. However, these ambitions need to be balanced against an achievable and realistic housing target.

Richmond is a highly distinctive borough, with much of its area comprising protected parks and gardens, a significant number of heritage assets and listed buildings, and an extensive network of conservation areas. This natural and historic environment is strategically important to London as a whole and, consequently, achieving an appropriate balance between its conservation and new growth is also of strategic importance. These characteristics make the optimisation of existing residential sites particularly challenging.

In addition, the nature of Richmond is such that there are very few larger development sites available, and, by comparison to most other London boroughs, a very limited supply of industrial and employment land. What land there is in industrial and employment uses is strongly protected due to its scarcity and the important employment opportunities it provides for residents. Richmond is also unique in spanning both sides of the River Thames, creating additional constraints and considerations for development. Large parts of the borough are susceptible to flooding, a challenge that is likely to become more acute over time because of climate change. Collectively, these factors make finding opportunities for the delivery of large-scale housing development particularly challenging.

It is also of particular concern to the Council that the draft Plan risks not fundamentally improving the build out rate of development. The nature of the planning system is such that individual boroughs are held responsible for housing delivery in their areas, but the vast majority of the housing that is delivered is not within the Council's control. The Council is aware of a significant number of homes on sites that it has permitted in recent years which have since stalled or otherwise not been delivered. There is a sense of futility to increasing a housing target in a context where developers are not delivering against the permissions they already have, and the Council would encourage the Mayor to work with Government to consider ways in which the fundamental barriers to build out can be addressed (including the availability of grant as elaborated on in a later section) and to strengthen boroughs' ability to enforce build out. The presence of these stalled sites heightens the Council's concern that its proposed housing target does not strike the right balance between ambition and deliverability in practice.

In addition to the more detailed technical comments on the 2026 Strategic Housing Land Availability Assessment (SHLAA)[10] contained in Appendix 1, the Council's detailed representations regarding individual components of the borough's housing target are set out below.

Permissions

The Council has examined the London SHLAA, which sets out the Mayor's approach to determining individual borough housing targets. As a point of principle, the Council has no opposition to the inclusion of permissions within the 10 Year Housing Targets, consistent with the approach taken in

[10] 2026 London Strategic Housing Land Availability Assessment (SHLAA)

national policy, and with particular reference to the definitions of 'deliverable' and 'developable' set out in the NPPF.

On this basis, the Council is satisfied that a significant number of sites included as permissions in the SHLAA are soundly assumed as deliverable or developable consistent with the Council's Authority Monitoring Report (AMR)[11]. However, the Council has identified a number of discrepancies between the SHLAA's assessment of permissions and the Council's AMR. In particular, the Council has identified cases where the timing of delivery assumed within the SHLAA does not reflect the most up-to-date information available, and where there is uncertainty regarding the treatment and phasing of anticipated housing gains and losses within the trajectory.

The Council has communicated these discrepancies to the GLA separately at a site-specific level. The Council's view is that these discrepancies could affect both the level and timing of housing delivery assumed within the trajectory and should therefore be reviewed to ensure that the housing target is informed by the most up-to-date available evidence.

In order to be sound, the borough's housing target must be consistent with national policy (in relation to ensuring all sites included within the 10-year period meet the definitions of deliverable and developable) and be effective (in that there should be a reasonable prospect that local plans will be capable of implementing the spatial strategy). Consequently, it is critical that housing targets reflect an accurate understanding of future housing supply which, in the context of permissions, means that sites are appropriately reflected within the housing trajectory and assumed to come forward within realistic timeframes based on the latest available evidence. For the Plan to be found sound, the contribution made by permissions to the borough's housing target should therefore be reassessed to address the discrepancies identified. The Council would be happy to work with the GLA to discuss these matters further.

Small Sites

The Council notes that the borough's housing target has been informed by evidence prepared to estimate the potential capacity and likely delivery of housing on small sites (<0.25ha) across London. As a general principle, the Council supports the ambition of increasing the delivery of housing from smaller sites and recognises the benefits of a diverse housing market which provides opportunities for SMEs.

However, it is equally important that assumptions made regarding small site delivery are realistic and sound in their own right.

The Council notes that the approach taken to estimating small site capacities builds on the provisions in national policy which relate to establishing a windfall allowance. These state (emphasis added):

> *Where an allowance is to be made for windfall sites as part of anticipated supply, there should be* ***compelling evidence*** *that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends*

[11] Housing AMR 2024/25 (see under Local Plan monitoring 2025)

Whilst the methodology (set out in the SHLAA) is informed by historic delivery evidence, the small sites forecasts are not simply based on long-term average delivery rates. Instead, they assume that delivery can increase beyond recent performance levels, drawing in part on higher historic rates of delivery and the anticipated benefits of policy interventions. However, the resulting small sites contribution is highly dependent on assumptions regarding the proportion of identified capacity that will realistically come forward, including the effectiveness of the London Small Sites Design Code LPG (currently out for consultation)[12] and other measures intended to provide greater certainty for applicants and decision-makers, reduce determination times and improve the efficiency of the planning process.

Given the significant difference between the notional capacity identified (613,313 homes across London) and the level of delivery assumed within the plan period (136,914 homes), the robustness of the methodology is highly dependent on the validity of the delivery-rate assumptions applied. These assumptions therefore become a critical determinant of the overall small-sites contribution.

The Council notes that there is limited information available as to the underlying findings of the small sites evidence base, beyond summary tables showing results in the SHLAA. In the absence of access to these underlying findings, it is challenging for boroughs to understand how the borough-level capacities and delivery assumptions have been derived, the basis for the delivery rates applied to different small-site typologies, and the extent to which local constraints and characteristics have been taken into account when generating the final capacity estimates. It is therefore challenging to reach a view as to whether the assumptions made, and the outcomes they imply, are sufficiently robust.

The Council also notes that the initial identification of a large proportion of small-site opportunities is derived from a proprietary AI tool. Collectively, the three typologies identified through this approach (single infill, multi-unit infill and intensification) account for 83% of Richmond's proposed small-sites contribution to the housing target. Whilst boroughs have been provided with summary outputs by small site development typology and SAM band, insufficient information has been made available to understand how the underlying opportunity datasets have been identified and classified, or to independently verify the resulting capacity estimates, including through access to GIS datasets. The Council further notes that paragraph 8.17 of the SHLAA indicates that the GLA itself was provided with only a "summarised dataset" of outputs, potentially limiting the extent to which the underlying methodology and resulting capacity estimates have been independently scrutinised.

These summary tables identify a 10-year small sites contribution of 2,919 dwellings for Richmond (54% of the overall draft housing target). For comparison, according to the Council's monitoring data delivery on small sites (<0.25ha) in Richmond over the past 5 years from 2020/21 to 2024/25 has averaged 104 dwellings per annum.

In particular, the basis for the additional delivery-rate uplifts applied to reflect the anticipated effects of the London Small Sites Design Code LPG and related policy interventions is unclear. The SHLAA applies a further 25% uplift to delivery rates for multi-unit infill and intensification schemes, and a 50% uplift for single-unit infill schemes, to reflect assumed improvements in planning certainty, approval times and housing delivery. The application of the final 25% and 50% delivery-rate uplifts therefore has the potential to make a substantial contribution to Richmond's overall small-sites figure (and overall housing target). The Council does not consider that the SHLAA provides a sufficiently robust

[12] Draft London Small Site Design Code LPG consultation (September to December 2026)

justification for the delivery-rate uplifts applied, relying primarily on a footnote reference to a modelling study of multifamily housing development that examines the effects of reduced approval times on housing delivery in an international context, rather than evidence demonstrating how comparable outcomes could realistically be achieved within London.

Whilst the Council acknowledges the intention of the London Small Sites Design Code LPG to facilitate increased delivery, it is not evident that the anticipated benefits will be realised to the extent assumed in boroughs such as Richmond, where extensive heritage constraints may limit opportunities for some forms of small-site development. The SHLAA excludes intensification (demolition and rebuild) opportunities within Conservation Areas and on sites containing pre-1919 buildings, yet still assumes that intensification schemes will contribute around 400 dwellings towards the borough's small sites component of the borough's housing target. Given the prevalence of Conservation Areas (covering over half of the borough) and historic buildings across Richmond, the Council is not persuaded that the evidence presented demonstrates that this level of delivery is realistically achievable.

The Council's view is that further information should be provided to boroughs to allow them to examine the robustness of the underlying evidence base that has informed small site capacities, particularly given the significant difference between the notional capacity identified and the level of delivery ultimately assumed within the plan period. The robustness of the methodology is therefore heavily dependent on the delivery-rate assumptions applied and the expectation that policy interventions will increase rates of development beyond historic trends. In the absence of greater transparency regarding these assumptions and their evidential basis, the Council considers that the 'compelling evidence' required by Policy HO3(2) of the NPPF (2026) to justify reliance on a windfall allowance has not been adequately demonstrated. The Council therefore considers that this component of the borough's housing target is not sufficiently justified and may not be effective. Addressing these matters is particularly important given the findings of the London Plan Examination in Public in 2019, which concluded that the draft Plan's original small-sites assumptions were neither justified nor deliverable and recommended a substantial reduction in both the London-wide small-sites contribution and the resulting borough housing targets.

Industrial Land

Please note specific points related to the approach that boroughs are expected to take to industrial land release are instead addressed under Policy PV5.

The Council notes that the draft Plan assumes that industrial land, including Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) (the latter of which are identified as *Locally Important Industrial Land and Business Parks* in the adopted Richmond Local Plan) can make a significant contribution to housing delivery across London. In Richmond, the borough's housing target assumes that around 180 dwellings will be delivered from industrial land.

Applying the initial exclusion criteria set out in the London SHLAA, much of the remaining industrial land within the borough that falls within scope for consideration towards industrial land housing capacity is likely to be concentrated in the east of the borough, where a greater proportion of land scores SAM 4 or above and is therefore identified as having greater potential for residential development. However, industrial land within all parts of the borough is generally characterised by low vacancy rates and continuing investment by occupiers, calling into question assumptions regarding its availability for release.

The Council has reviewed the SHLAA additional industrial data for Richmond and has identified a number of areas where further clarification of the underlying assumptions would be beneficial. These include the treatment of completed, implemented or expired planning permissions, and the basis on which certain industrial land release assumptions have been identified and assessed as deliverable, where local evidence suggests that industrial sites continue to perform an important economic function and remain attractive to occupiers. Collectively, these matters suggest that further review of the capacity and deliverability assumptions for some sites may be warranted to ensure the housing supply evidence is robust and reflects the most up-to-date local information.

As a point of principle, the Council is concerned that the evidence provided to explain how the exclusion and filtering criteria have been applied to industrial locations, and how the resulting housing capacities have been derived through application of the Optimisation Framework, has not provided sufficient detail to enable the Council to understand or scrutinise the assumptions made for individual locations. Whilst the SHLAA describes the methodology at a strategic level, it does not provide sufficient information to enable boroughs to understand how the Optimisation Framework has been applied to individual locations, the assumptions underpinning the resulting capacities, or the extent to which local constraints have been taken into account. Whilst the Council is able to identify the broad spatial distribution and indicative capacity assumptions underpinning Richmond's industrial land release figures, it is not satisfied that sufficient evidence has been provided to demonstrate that these assumptions are realistic. Many of the industrial locations affected continue to perform an important economic function, exhibit very low vacancy rates, have attracted limited interest in residential redevelopment (beyond sites that already benefit from planning permission), and continue to benefit from ongoing and recent investment and redevelopment for economic purposes. The Council therefore considers that further evidence is required to demonstrate that the scale of industrial land release assumed can realistically be achieved within the Plan period.

By cross-reference to the requirements of Part A of Policy PV5, the Council considers there is a strong likelihood that many of these locations would meet criterion (1), which requires boroughs to exclude from release industrial sites required to contribute to strategic and local needs, and that further parcels may also be excluded under criterion (5), which requires release to be avoided where it would undermine the operation of the remaining industrial uses.

Linked to the above, the Council is concerned that the approach to identifying the capacity of additional industrial land for release does not appear to have been informed by any assessment of the economic impacts of such release, including on local and strategic economies, jobs and supply chains. The Council would expect that any local plan process which promoted the release of industrial land would, as a fundamental part of demonstrating soundness, need to provide evidence that the impacts of such industrial land release had been fully assessed and mitigated, and that therefore the strategy as a whole was justified and sound. The draft Plan appears to defer any detailed consideration of such justification to local plans; whilst this is supported in principle, it nevertheless raises a significant question of soundness to make a substantial assumption around industrial land release within the borough's housing target when it is entirely possible that the local plan process may reach an alternative conclusion on the justification of the strategy, or at least a different understanding of the amount of industrial land that should be released. Policy HN1 does not clearly address or resolve the question of what a borough should do if its local plan process identifies that a lower amount of industrial land release is appropriate or developable within the 10-year period, informed by more

detailed evidence, and whether the Mayor will support boroughs in such circumstances, recognising the limitations of the strategic approach used to inform the London Plan's assumptions.

The Council is also concerned that assumptions around industrial land capacity do not appear to apply national policy definitions of deliverability or developability when assigning industrial land capacity to 10-year targets. To demonstrate that a site is developable within a 10-year period, there must be a reasonable prospect of the site being developed. To the best of the Council's knowledge, the draft Plan has not been informed by engagement with the owners of the affected industrial sites, these sites have not been promoted through the Land4LDN Call for Sites exercise, and there is no specific evidence that affected landowners are actively interested in transitioning industrial uses to residential development. The availability of this land therefore appears uncertain and has principally been inferred from strategic modelling assumptions, viability considerations and past trends, rather than evidence that the sites are likely to come forward within the plan period. For these reasons, the Council is not satisfied that Policy HN1 has demonstrated the developability of the industrial land assumptions that underpin this component of the borough's housing target.

In light of the above, the Council has concerns regarding the soundness of the industrial land assumptions made as part of the borough's housing target, and the evidential basis for the strategy that they seek to promote. The Council is not satisfied that the approach taken to assessing availability is consistent with the national policy definition of 'developable', given the absence of evidence that the affected sites have a reasonable prospect of being developed within the plan period. The Council is also concerned that the strategy is not sufficiently justified, given the absence of any assessment of the economic impacts of such industrial land release on local and strategic economies, jobs and supply chains. Furthermore, the Council is not satisfied that sufficient evidence has been provided to demonstrate that local plans have a reasonable prospect of implementing the spatial strategy assumed by Policy HN1, having regard to the uncertain suitability, availability and deliverability of the industrial land identified. For these reasons, the Council considers that the Plan's approach to Policy PV5 should be fundamentally reviewed, and that the GLA should review, and where necessary, reduce the contribution that industrial land is assumed to make towards the borough's housing target, to ensure that the Council's Local Plan is not prejudiced by the inclusion of an industrial land assumption. The Council would welcome further work with the GLA on matters including:

- A robust assessment of the economic impacts of significant industrial land release within the PMA, including impacts on local and strategic economies, jobs and supply chains.
- A fundamental re-examination of the availability of land assumed suitable for release, undertaken in collaboration with affected boroughs, to ensure that only land meeting the national policy definition of 'developable' is included within the 10-year housing targets.

Overall, the Council recommends that the GLA reconsider its approach to delivery in Richmond, particularly in relation to the modelling of housing delivery on small sites, including those within conservation areas, where heritage and townscape considerations will inevitably influence the level of optimisation that can realistically be achieved.

If the proposed housing target for Richmond is to be achieved, this is likely to require additional grant funding and other interventions to help reduce development risk and improve viability. The Council would welcome closer working with the GLA to help unlock development opportunities that are currently constrained by viability challenges. According to the Council's latest published Housing

Authority Monitoring Report 2024/25, Richmond currently has 905 units with planning permission that are not yet under construction. However, this figure is expected to increase substantially in the next AMR following the grant of permission for 1,075 homes at the Stag Brewery site in May 2025, which has yet to commence.

At present, the GLA's Affordable Homes Programme is primarily focused on unlocking larger sites capable of delivering substantial numbers of homes. While this approach has an important role to play, it is unlikely on its own to bring forward housing delivery at the pace required in boroughs such as Richmond, where opportunities often arise on smaller and medium-sized sites. These sites can face significant viability challenges and may require proportionately greater levels of grant funding to come forward.

Given that housing delivery in Richmond has exceeded the proposed target of 540 dwellings per annum in only three of the last 20 years, the Council considers that boroughs should be provided with the support necessary to maximise delivery. In particular, grant funding should not overlook smaller and medium-sized sites, which can often be delivered more quickly and benefit from stronger absorption rates. Richmond continues to experience strong housing demand, driven in part by its attractiveness as a location for families.

If the proposed housing target is to be implemented, there should be a clear reassessment of how grant funding is allocated, so that outer London boroughs have a realistic opportunity to secure funding for smaller and medium-sized schemes. This would help encourage renewed investment from registered providers in areas where activity has reduced in recent years. More generally, if the GLA wishes smaller and medium-sized sites to deliver a significant proportion of London's housing target, it should review its approach to grant funding to ensure that boroughs with a greater reliance on such sites are not overlooked and are able to contribute effectively towards housing delivery.

The Council welcomes the recognition in paragraphs 3.15 and 3.16 of the draft Plan that local plans and supporting evidence may demonstrate that the housing capacity assumptions underpinning borough housing targets cannot realistically be delivered within the assumed timeframe, and that boroughs may provide evidence regarding the availability and timing of identified housing capacity. However, the Council is concerned that paragraph 3.17 states that any additional capacity identified, including on greenfield sites (notwithstanding the Council's position on Green Belt development as set out in the response to draft Policy PV7) should be considered additional to the overall housing target. This provides limited flexibility for boroughs where robust local evidence demonstrates that elements of the capacity-based target, such as assumed site capacities, density assumptions or delivery rates, are not achievable in practice. In such circumstances, boroughs should have greater flexibility to substitute alternative sources of housing supply where appropriate, rather than being expected to deliver any additional identified capacity wholly above and beyond the overall housing target. Greater clarity is therefore required regarding how boroughs should respond where local evidence supports a lower level of capacity from the sources assumed within the SHLAA.

HN2 Protecting and reshaping housing

The Council supports the principle of Policy HN2 and welcomes the continued protection of housing in the borough. However, the Council has concerns around the soundness of the wording of HN2(A)(1), which appears to be more lenient towards amalgamations – for example, the conversion of multiple flats into a single-family home – compared to the 2021 London Plan. Stating that the loss of self-

contained housing should be resisted unless "replaced with at least the existing floorspace and, where possible, uplifting existing densities…" appears to allow for the amalgamation of multiple dwellings into fewer, larger dwellings as long as the overall floorspace in residential use remains the same. Whilst there are circumstances where amalgamations should be supported, the Council notes that Policy HN2's approach, with particular reference to the relevant test being based only on floorspace, is inconsistent and in active opposition with the Plan's wider approach to increasing housing delivery, and in particular to housing targets, which is expressed on a per unit basis (i.e. not in floorspace terms). Given that developments that result in the loss of housing, through amalgamations, count against the achievement of borough housing targets on a per unit basis, the fact that Policy HN2 only seeks to protect residential uses on the basis of floorspace risks undermining the ability for local plans to deliver against their housing target, meaning Policy HN2 as written is ineffective and therefore unsound.

The relationship between amalgamations and housing targets is of particular concern for Richmond, which receives a large number of applications for amalgamations, sometimes resulting in the loss of up to three dwellings (for example by converting four flats into a single large house). Local Plan Policy 14 resists such proposals, however the wording of draft Plan HN2 will make it more difficult to oppose these applications.

In order to make Part A sound, the Council recommends the following modification:

> A.(1). replaced with at least the existing ~~overall floorspace~~ number of dwellings and, wherever possible, uplifting existing densities, in line with MBUL2 Optimising the use of land and site capacity, and

The Council supports HN2(A)(2) and (3) which goes further than the 2021 London Plan to protect existing affordable housing. The requirement for social rent homes to be replaced by the same floorspace within that tenure, and for other low-cost rent and intermediate homes to be replaced specifically by the same floorspace within that tenure or a more affordable tenure will greatly benefit the protection of affordable homes in the borough. This will prevent affordable homes being replaced by homes that are technically affordable, but not as affordable as the home that is lost (for example replacing a London Living Rent dwelling with a Discount Market Rate dwelling).

HN2(C)(3) is of benefit to the Council, as it has removed the requirement for a viability assessment on all schemes that result in a loss of affordable housing and allows for the Fast Track Route to be followed for schemes where at least 50% of the additional housing is affordable and provided in line with tenure requirements. This reduces resource requirements for the Council and provides an incentive for developers to provide at least 50% affordable housing as part of the additional housing in the scheme.

The Council supports HN2(D) where development proposals for modular temporary accommodation as a meanwhile use are encouraged as this optimises underutilised land in the short term and goes some way to temporarily address homelessness whilst permanent affordable homes are being built. The Council agrees with the rationale given in paragraph 3.34, in particular that modular housing is an effective way to address urgent local housing – however, stress should be given that this should only be a temporary measure as permanent social rented housing remains a priority to address housing need.

Paragraph 3.26**:** The Council supports the clarification given in this paragraph that the loss of specialist and supported housing is not justified where Mayoral evidence or local authority evidence (such as a Local Housing Need Assessment) indicates a need for such accommodation in the borough, unless it

can be demonstrated that need will still be met. This affords stronger protection of specialist and supported housing than in the 2021 London Plan. The Council supports the inclusion of the wording "without resulting in a strain on existing resources", as it is sufficiently broad such that the local authority in question can determine whether a loss of accommodation, even if addressed by alternative provision, will cause an increased strain on resources, and gives the local authority the power to determine the acceptability of such loss.

Paragraph 3.28**:** The Council is supportive of the provision that schemes that meet the criteria in Part A and provide 50% of the additional residential accommodation as affordable housing will be able to follow the Fast Track Route – this is positive for developers and will make the planning process quicker. There is concern about the requirement that any affordable housing re-provided as part of redevelopment should be measured by floorspace, but any additional affordable housing provision should be measured by habitable room, as this will make calculations quite complex – however, the Council appreciates this could be useful where existing dwellings do not meet minimum space standards.

HN3 Delivering affordable housing

HN3.A(1) and HN3.B(1): The Council welcomes the draft Plan's continued commitment to maximising the delivery of genuinely affordable housing and maintaining London's strategic target of 50 per cent affordable housing.

HN3.A(3) and HN3.C - Threshold approach

The Council welcomes the retention of the higher affordable housing requirements in Location Band A. In principle, the Council agrees that adopting a banded approach is appropriate as it helps to ensure that the viability challenges experienced acutely in some London boroughs will not unduly reduce the affordable housing requirements in more viable London areas over the full plan period. Furthermore, the Council supports the placement of Richmond in Location Band A, since requiring 35 per cent of affordable housing on private sites aligns with the Council's recently adopted Local Plan (2025) and reflects the importance of responding to the borough's significant needs for affordable housing and the findings of the Whole Plan Viability Assessment prepared to support that Local Plan.

However, the Council is concerned that paragraph 3.53 of the draft Plan states that the thresholds provided in Table 3.2 could be amended later through London Plan Guidance (LPG). The Council feels strongly that the soundness of Policy HN3 depends on the thresholds being informed by a proper examination of evidence on need and viability, so that any impacts (positive or adverse) of changing thresholds on affordable housing delivery can be assessed, understood and examined. Changing London Plan policies through an LPG is not an appropriate way to amend thresholds as it avoids any examination of the justifications for (and therefore soundness) of this approach. The Council is aware of the ongoing legal challenges on the Support for Housebuilding Measures. Moreover, any future changes to the threshold approach outside of a plan process create uncertainty and present significant challenges where requirements are altered midway through negotiations on large-scale developments. Such changes risk undermining the effectiveness and credibility of planning policy by introducing lower expectations after schemes have been the subject of many years of negotiation. The Council has observed that as a result of the Time-Limited Planning Route introduced in the recent LPG, developments that have progressed on the basis of agreed affordable housing provisions are now seeking to renegotiate those commitments, not specifically to address scheme-specific viability but by

citing the lower thresholds in the LPG as essentially new 'policy'. This includes schemes that have only recently secured planning permission. As such, the Council's view is that, in order to be sound, affordable housing thresholds should only be altered through a new London Plan or through a Local Plan. Any local changes would be informed by area-wide viability evidence, allowing local planning authorities to set thresholds that reflect local circumstances and identified housing needs.

In relation to public and industrial land, the Council has concerns that the draft Plan has lowered the affordable housing requirements compared to the existing London Plan. Given that the London Plan has retained the 50 per cent strategic affordable housing target, the Council is concerned that the lower requirement on industrial and public land will undermine achieving that target. The lower threshold on public land would also reduce the incentives for public sector landowners to maximise affordable housing delivery, as the lower requirement is likely to be capitalised into higher land values rather than translating into improved housing outcomes. As a result, the proposals risk weakening the contribution that public sector land can make towards addressing the housing crisis over the long term. However, the Council welcomes the confirmation that portfolio arrangements agreed on public sector land prior to the adoption of the new Plan will continue to be assessed in accordance with the existing agreements and commitments already in place.

The Council also notes that a lower threshold is proposed for sites of between 10 and 36 dwellings. The characteristics of Richmond's housing supply are such that these sites make up a significant proportion of the homes delivered, and they are therefore a significant source of affordable housing supply. Within this context, the Council is concerned that reducing the thresholds for sites of less than 36 dwellings will lead to a long-term opportunity cost of affordable housing delivery from more viable sites within the borough and further ensure that London will not reach the 50 per cent strategic target. The Council notes that less viable sites retain the option for viability testing which is a material factor when considering whether a lower threshold is justified.

In order to allow local plans to effectively respond to the Mayor's strategic target, high levels of strategic and local affordable housing need and local viability potential (particularly across the full lifetime of the Plan), the Council considers that the policy's restrictions on local plans setting thresholds above those specified in HN3 should be removed. Any material factors that may have informed this cautious approach could reasonably be assessed through the examination of the soundness of a local plan policy, where local evidence on need and viability will be examined. The potential for these local variations is recognised in Supporting Text paragraph 3.40, but this is not appropriately acknowledged in the wording of the policy itself, which limits its clarity and effectiveness and therefore its soundness.

For the above reasons, the Council would encourage the Mayor to make the following amendments to make Policy HN3 appropriate and effective, and therefore sound:

> C. Proposals for residential development are subject to the Threshold Approach to Planning Applications and should follow the fast-track route through planning, where they provide the relevant percentages of affordable housing on gross residential development in the locations or on the land profiles set out in Table 3.2 and Table 3.3, or as specified in a local plan where adopted after this Plan
>
> 3.40. Local Planning authorities ~~that fall into location B or C,~~ may explore increasing the threshold through their local plan ~~to the relevant adjacent higher locational threshold~~ if economic conditions improve and it can be demonstrated to be deliverable through robust local

viability evidence. Any threshold set should cover the entire extent of the local planning authority boundary and should not exceed the threshold of location A unless there is clear evidence that this can be delivered in practice.

3.53. The threshold levels set out in policy will be monitored and reviewed at appropriate points in time to determine how it is influencing delivery rates. Any changes to the thresholds will be made through ~~London Plan Guidance~~ local plans or a focused review of the London Plan

HN3.P: The Council welcomes that the London Plan confirms the requirement for viability evidence in cases where the applicant aims to reduce the affordable housing contribution on extant consents. However, the Council recommends that the wording of this requirement is changed to allow Councils to effectively enforce this requirement and ensure robust justification is provided.

To be made more effective, HN3.P should be amended to the following wording:

> The applicant ~~should~~ must provide a robust justification, including how circumstances have changed since the main consent was issued

The Council has concerns about the following policy wording in paragraph 3.36 of the Supporting Text: 'The fast-track route through planning does not require a viability assessment to be submitted at the planning application stage. Local planning authorities should not impose additional requirements for applicants in order to meet the fast-track route'. This wording is contradictory to the points made in Paragraph 3.40 and in HN3.D(1) where it states that development proposals should provide 'at least 60 per cent low-cost rent homes. Given the policy wording in HN3, LPAs would not be able to impose a local 70:30 tenure split requirement for the fast-track route. This is a serious concern, and the Council would strongly recommend the policy wording is amended to allow tenure requirements that maximise the delivery of Social Rented homes.

To be effective, the Council considers that the new London Plan should specify a minimum affordable housing threshold for schemes seeking grant funding. In order to maximise on-site affordable housing delivery while recognising differing site circumstances and viability constraints, grant funding could be targeted towards schemes providing at least 20% affordable housing, with the tenure split aligned to the relevant Local Plan. Grant decisions should, however, be informed by a detailed assessment of viability to ensure that public funding is genuinely maximising affordable housing delivery rather than replacing provision that could otherwise be delivered without subsidy. Such an approach could help unlock a wider range of sites while ensuring the effective use of limited grant funding, as it is often the case that sites with viability issues are the ones that need grant support to actually come forwards.

The Council is also concerned that insufficient attention is given to the prices RPs are paying for affordable housing units. In some cases, lower RP offers have increased the level of grant required to secure affordable housing delivery, compounding pressures arising from increasing development costs. Greater transparency is needed regarding the basis on which RP offers are calculated and the assumptions that underpin them. The London Plan should encourage a more transparent approach to affordable housing acquisitions and ensure that public subsidy is used efficiently to maximise affordable housing delivery.

Paragraph 3.42 in the Supporting Text: The Council welcomes that the draft Plan recommends assessing the affordable housing contribution based on floorspace if the habitable room sizes are not

comparable. This has been a key consideration for the Council on sites involving mixed tenures i.e. where a scheme provides student/co-living alongside on-site C3 housing.

Paragraph 3.48 in the Supporting Text: The Council would recommend that the London Plan provides a clearer definition of genuinely affordable homes, and requires these tenures to be delivered to meet the 60:40 minimum requirement for the fast-track route, this would therefore still allow other less genuinely affordable tenures to be delivered if necessary using the viability tested route. The current wording in the existing London Plan, which is similar to the draft Plan, is not clear enough to exclude tenures which are not genuinely affordable. The lack of an effective definition makes it far more difficult for LPAs to enforce the delivery of genuinely affordable homes.

HN3.D - Tenure splits

The draft Plan proposes a 60:40 affordable housing tenure split in favour of low-cost rent. This represents a reduction in ambition compared to the current London Plan, which allows LPAs, where supported by local evidence, to require a 70:30 tenure split. The Council is concerned that a 60:40 tenure split will not deliver a sufficient number of Social Rented homes to meet the urgent need for this tenure by 2037. This risks increasing reliance on temporary accommodation, thereby worsening housing pressures and imposing substantial long-term financial costs on local authorities across London. The London Plan should seek to reverse this trend. It is well documented that households can spend up to three years in temporary accommodation – a significant period that can have substantial and long-lasting adverse impacts on the wellbeing of vulnerable groups, particularly for children. The proposed tenure split does not go far enough to address the scale of need for Social Rented homes and risks perpetuating the housing pressures faced by many Londoners, while continuing to place significant financial burdens on London boroughs.

In order to be justified and effective, the starting point of HN3.D(1) should be a 70:30 tenure split. This split better reflects local needs, as identified both in local housing needs assessments and the Mayor's Strategic Housing Market Assessment (SHMA)[13], and the wider imperatives for planning for social rented housing across London. Furthermore, in order to be justified and effective, and to maximise the delivery of Social Rented homes, the policy should move away from the term 'low-cost rent homes' and replace it with Social Rented homes, reflecting the wording and priorities of the NPPF. Whilst the Council welcomes that the wording of HN3.D.(1), which states that *at least* 60 per cent of low-cost rent homes should be provided as part of the tenure split, the policy does not make it sufficiently clear that LPAs can require a higher share of Social Rented homes through their Local Plans. If that is the intention, the policy wording needs to be made clearer to make the London Plan sound.

Furthermore, the Council is concerned that Policy HN3 fails to have regard to the fact the need for affordable housing tenures, and viability capacity, is not homogeneous across London. Therefore, in order to maximise the contribution that individual boroughs can make to both local and strategic needs for genuinely affordable housing, and in order to be justified and effective, the Council considers that HN3.D(1) should be amended to allow local plans to alter the tenure split to an alternative split that best reflects local needs and viability. This would not undermine the strategic approach of Policy HN3 but rather improve its soundness, by ensuring that local plans are not fixed into a tenure split that fails

[13] The Strategic Housing Market Assessment (2026) is available via the London Plan Evidence webpage, under 'Delivering the homes and neighbourhoods Londoners need'

to maximise delivery of the types of housing most needed where there is viability capacity, or wider justification for doing so.

HN3.D(2): The Council is also concerned about the flexibility provided on tenure splits on schemes that provide at least 75 per cent of affordable housing. Given the urgent need for more Social Rented homes across London, this flexibility should only be awarded to schemes providing 100 per cent affordable housing.

HN3.D(3) and Table 3.2: The Council does not support that Build to Rent schemes are allowed to deliver 100 per cent of the affordable housing as Key Worker Living Rent to meet the 25 per cent threshold in Location Band A. Given the market for C3 market housing for sale remains challenging, it is likely that a larger proportion of C3 housing will be delivered as BtR in the short to medium term since BtR still attracts comparatively high levels of investment. The combined effect of the overall reduction in affordable housing thresholds, the proposed restrictions on affordable housing tenure, and the proposal to not allow BtR developments to deliver Social Rented housing is likely to compound to a significant reduction in the overall delivery of social rented housing, which may have knock on effects in relation to local authority expenditure on temporary accommodation, at a time when many councils have seen significant budget cuts.

Considering the above, the Council does not consider that Social Rented housing should be excluded from BtR schemes. Although single management arrangements can make it harder to include social rented housing in BtR blocks, many London schemes have delivered BtR alongside Social Rented homes by using separate cores or blocks. This has produced a more affordable offer overall and supported mixed and balanced communities. Excluding social rented tenures from BtR can also not be justified through the single-management rationale, since a block combining KWLR and BtR would already involve separate managements, with a provider for the intermediate homes and a management company for the BtR units. This is no different from a scheme combining social rent and market housing. The Council has observed that including social rented tenures within BtR schemes can also benefit developers. Unlike DMR, social rented housing can attract significant grant funding and generate early cashflow through payments from Registered Providers.

If a scheme can accommodate two separate blocks on one site (i.e. a BtR and a KWLR block), boroughs and the Mayor should retain the ability to require a minimum tenure split of least 60:40 (or 70:30 if the tenure split is changed) in favour of Social Rented housing. Although BtR developments appear less viable than conventional market housing for sale when assessed through viability testing, this is not reflected in market behaviour since landowners continue to pursue BtR as the more viable option compared to market housing for sale. In practice, BtR continues to attract significant investor interest and remains a prominent delivery model across London, demonstrating that returns are sufficient to support investment.

Given the growing role of BtR in housing delivery, it is essential that these schemes contribute meaningfully to meeting identified housing needs through the provision of Social Rent homes. Without stronger affordable housing requirements for BtR developments, the proposed 60:40 tenure split is unlikely to deliver sufficient levels of low-cost rented accommodation to meet identified needs. This risks widening the gap between housing supply and demand, taking boroughs further away from meeting the need for genuinely affordable housing up to 2037, as identified in the draft Plan.

In light of the above, the Council considers that the proposed changes to policy HN3.D are necessary for soundness:

> (D) In addition to the threshold levels set out in C, development proposals for schemes of 10 homes or more should provide the following to take the fast-track route through planning:
>
> (1) a tenure split of at least ~~60~~ 70 per cent low-cost rent homes and ~~40~~ 30 per cent intermediate homes, or the tenure split specified in the local plan, where adopted after this Plan; or
>
> (2) a tenure split that is acceptable to the borough or the Mayor when providing ~~75~~ 100 per cent or more affordable homes; or
>
> (3) in the case of BtR development a tenure split of ~~at least~~ 30 per cent Key Worker Living Rent homes and a ~~maximum~~ minimum of 70 per cent at a range of genuinely affordable rents (including social rent, where this can be accommodated in a separate core or block), or the tenure split specified in the local plan, where adopted after this Plan

The Council would also like to draw attention to the fact that Policy HN3 does not address the Vacant Building Credit (VBC) that has been carried over to the most recent NPPF (2026) Policy HO8. Although London boroughs generally disapply the VBC and this principle is firmly embedded in the Viability and Affordable Housing SPG (2017), this document is now nearly a decade old. The Council has seen some applicants making the case that the VBC should apply in the borough since disapplying it would amount to an inconsistency with national policy. Richmond would therefore benefit from Policy HN3 addressing VBC and reaffirming the principle of disapplying it in London. Applicants have raised paragraph 2 in Annex A of the NPPF (2026) which states that 'development plan policies which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight. The only exception to this is where they have been examined and adopted or made against this Framework.' As a result, in order to give greater weight to the principle of disapplying the VBC in London, the Council recommends that the Mayor incorporates that as policy in the new London Plan.

HN4 Gypsy and Traveller accommodation

As part of the draft Plan, pitch requirements are set out for each borough, with a requirement for 5 pitches within Richmond.

These figures are informed by the London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA)[14] carried out by RRR consultancy. As part of the work done by RRR consultancy, the Council voiced serious concerns about the methodology used by RRR in that it did not reflect local requirements or take into account specific considerations related to Gypsy and Travellers. This included the application of generic overcrowding assumptions within the modelling when research directly shows that family sizes of Gypsy and Traveller households indicate a higher density of occupation within the community.

As part of the London-wide GTANA, Richmond survey data was used as part of the model, resulting in a 5-pitch requirement. However, the Council's own Gypsy and Traveller needs assessment[15], which was

[14] London Gypsy and Traveller Accommodation Needs Assessment (GTANA)
[15] LBRuT Research on Gypsies and Travellers in LBRuT (February 2023)

examined as part of the recently adopted Local Plan, identified that no additional pitches were required within the Local Plan period. This figure was based on 10 years' worth of data from annual surveys on the Gypsy and Traveller site in the borough, which found that there is a general need for 1 pitch per annum which is being met through natural churn on the existing site. As part of discussions with RRR, the GLA and 6 boroughs who had their survey data used by RRR, it was decided that each borough's own pitch requirement figures would be included within the final London-wide GTANA. Contrary to this outcome, the draft Plan has disregarded each borough's own pitch figure and has presented only those figures produced by RRR. Given each of those 6 boroughs flagged serious errors in the methodology used by RRR as part of the London-wide GTANA, the decision to use its figures over borough's own figures is unjustified and unsound. Some of the errors flagged by the Council and other London boroughs regarding the London-wide GTANA include the practice of extrapolating survey responses across the whole population in London - the finding that 19% of Roma households experience overcrowding was based on survey responses from very low proportions of the populations in some boroughs (often only around 10% of the population in many boroughs) which was then extrapolated without any error or buffer assumptions. Consequently, the Council is concerned that the findings of the GTANA are unlikely to represent a true picture of need across London. To the extent that the need figures are informed by contested evidence, the Council considers Policy HN4 to be unsound on the basis that it is not justified or effective.

Due to the economics of competing land uses, where land does become available that may be suitable in principle for Gypsy and Traveller pitches, it is highly unlikely to be promoted or delivered as such, because it will nearly always be more viable for the landowner to bring that land forward for housing or economic uses instead, for which there is a clear need. In this context, the other approach would be to extend existing Gypsy and Traveller sites, however given the only Gypsy and Traveller site in Richmond is very constrained, there is no option to extend or add additional pitches in this location. In addition, there is an implication within the draft Plan that pitches are likely to be accommodated on green belt land. However, there are strong reasons to avoid development on green belt land, as set out in the Council's response on the relevant policy. In addition, areas of green belt are far less likely to be close to sufficient services and facilities able to accommodate Gypsy and traveller households. These dynamics make it practically challenging to deliver any new pitches within Richmond.

Overall, the main challenges with the provision of pitches are the competition for land uses and the competing expectations of the NPPF, draft Plan and proposed Small Sites Design Code (in relation to making best use of land and optimising capacities) which makes meeting any pitch target highly challenging. The Council notes there is a recommendation in the draft Plan to seek opportunities to provide pitches on Council owned land, however, with huge budget cuts to the majority of boroughs across London, the likely achievability of investment in such provision in the context of a wide range of competing demands is a matter of serious doubt.

The draft Plan also states authorities should allocate a Gypsy and Traveller transit site and/or make provision for negotiated stopping, depending on local circumstances. The London-wide GTANA identifies the need for 87 transit pitches across London (each pitch should be large enough to accommodate two caravans), referencing the survey responses, but it is unclear how these needs have been calculated and then attributed to a borough level. Given the borough's land constraints and the local needs as referenced above, it is considered the approach to transit sites should be considered at a strategic level, for example the appropriate distribution may be on a sub-regional basis, including

having regard to the highway network and infrastructure and patterns and levels of unauthorised encampments, to understand the availability of suitable sites as well as how needs are best met. The Council considers the evidence base on transit need should be reviewed to consider the appropriateness of the methodology and implications for its practical application and would welcome the opportunity to contribute to further discussions as part of the Examination process.

HN5 Managing specialist accommodation

HN5 applies across different types of specialist housing which all have very distinct traits i.e. co-living accommodation, student accommodation, older persons housing and specialist accommodation. This makes the supporting text very generic and causes it to jump around between accommodation types. To improve effectiveness, the Council recommends having co-living and student accommodation under one policy, with older persons and specialist accommodation under a separate policy with respective supporting text for each policy that refers to the specific type of accommodation.

The Council also strongly recommends the separate policy on older persons and specialist accommodation includes a section on Temporary Accommodation (TA). At present, TA is being used on an enormous scale throughout London, however there is no regulation on the quality, size or condition of the accommodation that can be provided. Considering there is evidence that on average households are living in TA for 3 years, poor quality TA will significantly impact on people's quality of life and is especially damaging for children. Sometimes rooms provided for TA can be less than 10sqm for a person with all of their belongings with them and no alternative place to go. Considering a habitable room for a C3 property must be at least 13sqm this shows the stark difference of TA and the need for regulation, or at the very least guidance on TA room sizes. Regulation on room size should also apply to co-living and student accommodation within the London Plan (at present there is guidance on co-living rooms sizes but this is just guidance, inclusion within the London Plan would ensure compliance with these standards), although the Council appreciate that students are not permanently living in their accommodation.

There are also different schools of thought surrounding affordable housing provision and TA, however, there is no definite answer within policy, making it very tricky for LPAs and Registered Providers to navigate. It is important to note that there are currently no legislative or policy restrictions on what private providers of TA can charge Councils, and as such TA can often equate to prices higher than Private Rented Sector rents, especially if the rents are set at a nightly rate. Therefore, TA often does not meet the NPPF definition of affordable housing. Additionally, it is often sourced, paid for and retained in a different way to affordable housing. Residents of TA are formally licensees and pay license fees rather than rent, and local authorities themselves determine what licence fees or rents to charge TA tenants. Tenants do not pay the owner of the property or landlord directly for the accommodation and as mentioned there is no regulation on what landlords may charge Councils for TA. Further detail is provided within the recently published report titled "The temporary accommodation subsidy gap in London: Analysis and implications".[16]

In light of the above, and for clarity and effectiveness, the London Plan should make much clearer that TA does not meet the definition of affordable housing but can provide for an identified need. It should

[16] The Temporary Accommodation Subsidy Gap in London Analysis and Implications (LSE London, October 2025)

also be clearly stated within the Plan that TA should meet relevant space standards. To address these concerns, the Council recommends the following wording is included within the London Plan:

> "Temporary accommodation is generally not considered as affordable housing, however it does meet an identified need. Proposals for new temporary accommodation should generally be subject to affordable housing requirements, however, in exceptional circumstances, where temporary accommodation is delivered directly by a borough or a not-for-profit organisation (such as a not-for-profit Registered Provider), these requirements may be disapplied – this should be considered on a case-by-case basis."

This wording is necessary to ensure communities are protected from private providers profiting from the current housing crisis by falsely presenting TA as a form of affordable housing, whilst ensuring that newly delivered for-profit TA helps support the delivery of genuine affordable housing to meet other needs.

HN5.A(1) - (2): The Council supports the approach taken by the draft Plan which recommends that LPAs seek to meet the need for PBSA through site allocations and identify if and where existing spatial concentrations of PBSA or LSPBSL accommodation may have a negative effect on mixed and inclusive neighbourhoods.

The Council welcomes the nil allocation for student bedspaces in Richmond, as the borough is not in practical travelling distance from any major Higher Education Institution (with the institutions within the borough not meeting this definition).

HN5.A(3) and Table 3.7: The Council is supportive of there being an identified need for Specialist, Supported and Older Person's Accommodation and supports the approach to separate target numbers according to the type of specialist housing. It is noted that supporting paragraph 3.78 states that the figures in Table 3.7 should be treated as minima and that the figures for older persons housing do not include needs within the private market. This makes it difficult for boroughs to plan for the genuine long-term requirements of older persons housing within boroughs.

The borough targets for Richmond for transitional supported housing, long-term supported housing and older persons housing are 30, 30 and 510 bedspaces respectively. It is appreciated that the data used in the evidence base for Policy HN5 (The Supply and Demand for Supported Housing in London, July 2026[17]) was provided by each local authority in London and reflects the raw data provided by the Council for the national Supported Housing Need Assessment. The Council is therefore in agreement with the target figures provided for transitional supported housing, long-term supported housing and older persons housing, as they are based on Richmond-specific data.

The Council has recently commenced the process of producing a Local Supported Housing Strategy, as a statutory requirement of the Supported Housing (Regulatory Oversight) Act 2023. This will include an updated needs assessment for older persons' accommodation (sheltered housing and extra care housing), transitional supported housing and long-term supported housing, with a requirement to publish the Strategy (including the need assessment) by March 2027. This will produce more up to date and locally significant targets for each type of specialist housing than those presented in the draft Plan.

[17] The Supply and Demand for Supported Housing in London (and summary) are available from the London Plan Evidence webpage, under 'Delivering the homes and neighbourhoods Londoners need'

It is appreciated that the requirement for this strategy is acknowledged in paragraph 3.76 of the draft Plan, and paragraph 3.77 states that local authorities should use the figures in Table 3.7 until their local needs assessments are completed. However, it is unclear whether the targets in Table 3.7 will be superseded once the Council has published its Supported Housing Strategy and associated needs assessment, or whether this element of London Plan HN5 is still intended to hold weight.

In the interests of clarity and effectiveness, HN5 should better detail how more up-to-date information should be considered in planning decisions, i.e. whether the targets in Table 3.7 are capable of superseding. It would also be useful to include information on how a local authority should treat targets produced in any future Local Housing Need Assessment (LHNA) it publishes. An LHNA uses locally-significant evidence to determine need and could have the scope to go into more detail than a local supported housing strategy – the Council has used evidence of need from its most recent LHNA to inform local plan policy and planning decisions. For example, the Council's most recent LHNA (2023) acknowledges that there is often an ability and preference for older residents to remain in their private family home and contract private care within their own home rather than move to specialist older persons housing. This means there is comparatively less need for additional older persons housing in the borough than might otherwise be the case. The LHNA also specifies that the provision of residential care beds should focused on those with dementia, a specification that the London Plan does not make.

In light of the above, the Council would recommend the following modification

> HN5A(3): plan to meet the need for Specialist, Supported and Older Person's Accommodation using Table 3.7 as a starting point, ~~alongside~~ or the need identified in any local and other relevant evidence where this can be shown to be more up-to-date and/or reliable

HN5(F): The Council supports Part F of Policy HN5 and strongly agrees that all types of older person's accommodation should provide affordable housing in line with Policy HN3 and the Local Plan's affordable housing policy. However, the Council objects strongly to the retention of the exemption for care home accommodation to be subject to this policy, as is suggested in supporting paragraph 3.75 that refers to the policy applying to accommodation as defined in the glossary of the plan, whereby 'Older person's accommodation' is not to be conflated with care home accommodation. The inclusion of this exemption in the 2021 London Plan (in supporting paragraph 4.13.4) has caused a great deal of uncertainty and delay in planning applications whilst the Council determined whether a scheme met the attributes of care home accommodation. Whilst the Council clearly agrees that care home accommodation plays an important role in meeting needs, it does not consider there to be a clear rationale for exempting care home accommodation from affordable housing contributions, particularly as a large amount of care home accommodation is owned and managed privately, on a commercial basis, with rooms often costing thousands of pounds per month. The draft Plan specifies that the target figures for older persons' accommodation in Table 3.7 do not account for private older persons housing and the Council know there is an increasing need for affordable care home accommodation – if care home accommodation remains exempt from affordable housing contributions it will be very challenging to provide affordable care home spaces which raises doubt over the soundness of the policy's strategy for meeting these needs. The Council's view is that any exemption or adjustment for care home accommodation should be clearly justified on the basis of viability, as with other residential tenures. It is also notable that the London Plan viability study does not include any specific care home typologies which raises further doubts over the evidential basis for this exemption (and therefore its soundness). The Council also notes that the Whole Plan Viability Study for boroughs often demonstrate that extra

care schemes, which are highly comparable to care home accommodation, are amongst the more viable tests, and provide a clear evidence base that 35% affordable will be viable as part of these schemes. In recognition of the affordable housing crisis across London, the Council's view is that all types of accommodation need to contribute towards the delivery of affordable housing to the extent they are able. Consequently, providing an exemption to certain types of housing when there is no clear or justifiable reason undermines the 50% strategic target and does not align with the NPPF, which requires development to ensure "the maximum possible contribution to affordable housing and other infrastructure is made".

For the above reasons, the Council strongly recommend that the exemption of affordable housing provision is removed for care home accommodation and a percentage of affordable care bedspaces, or an equivalent payment in lieu, is required through policy. Many care homes already provide at least 20% of care bed spaces for Local Authority nominations, often at a pre-agreed price as this diversifies their income and provides them with greater certainty of income for a proportion of the bedspaces. This shows this model can work in practise and the Council would recommend GLA colleagues reach out to housing commissioning teams within local authorities to incorporate this into the policy position for care homes.

The Council is recommending the following modification to make the policy sound:

> F. Development proposals for Older Person's Accommodation, and care home accommodation, should provide affordable housing in line with Policy HN3 Delivering Affordable housing.

HN5(H): The Council supports the addition of the requirement, where necessary, for other specialist/supported housing to ensure pick up and drop of facilities close to the principal entrance are suitable for taxis, minibuses and ambulances, rather than just having this requirement for older persons accommodation, as is the case in the 2021 London Plan.

Supporting paragraph 3.75: The Council supports the clarification given in paragraph 3.75 that "Supported, Specialist and Older Persons Accommodation policy applies to accommodation as defined in the glossary of this plan". However, the Council strongly disagrees with the definition given in the glossary for Older person's accommodation. The Council does not understand the justification for the statement within the definition to not conflate 'Older person's accommodation' with 'care home accommodation', and as such making care home accommodation exempt from the requirements of Policy HN5, whereas no exceptions are given within the definition of 'Supported and specialist accommodation', which means all specialist and supported accommodation is subject to Policy HN5, including the requirement to provide affordable housing in line with Policy HN3. Considering it is far more common for supported and specialist accommodation to be owned and run publicly, providing affordable accommodation for the end-user, it appears entirely unjustified that developments of such accommodation would be subject to an affordable housing contribution, when market-rate care home accommodation would not.

Supporting paragraph 3.78: The Council is supportive of the statement that local assessments for specialist housing are not expected to capture market rate specialist housing in their targets, adding focus to the provision of affordable specialist housing in the borough, which is of a higher priority need than market rate specialist housing.

Supporting paragraph 3.80: The Council is supportive of the requirement for the Design and Access Statement (DAS) for specialist and supported housing schemes to demonstrate how the needs of the specific user group are met in the design and functionality of the proposal. The Council considers that there should also be the requirement for the DAS to be approved by an access professional (such as a housing Occupational Therapist or access consultant accredited by the National Register of Access Consultants) – similar to this requirement in Policy HN9(I) for accessible housing.

HN6 Build to rent

HN6.A: The Council welcomes the recommendation that LPAs should set site allocations for Build to Rent (BtR) developments, as this helps to ensure that BtR is located in appropriate and well-connected places, while also allowing land that is more suited to other forms of development (including other types of housing) to be safeguarded.

HN6.B(4): The Council has concerns that the Plan only requires BtR developments to provide affordable housing as Discounted Market Rent (DMR) and Key Worker Living Rent (KWLR). The Council does not consider that social rented housing should be excluded from BtR schemes. Although single management arrangements can make it harder to include social rented housing in BtR blocks, many London schemes have delivered BtR alongside social rented homes by using separate cores or blocks. Excluding social rented tenures from BtR is not justifiable through the single-management rationale, since a block combining KWLR and BtR would already involve separate managements, with a provider for the intermediate homes and a management company for the BtR units. This is no different from a block combining social rent and market housing. The Council has observed that including social rented tenures within BtR schemes can also benefit developers. Unlike DMR, social rented housing can attract significant grant funding and generate early cashflow through payments from Registered Providers. As such, the Council is concerned that rather than giving flexibility to LPAs to require or support BtR schemes to deliver social rented homes where this has been proven to be viable and deliverable, Policy HN6 appears to prohibit it. Given the market for the delivery of open market housing remains challenging, it is likely that a larger proportion of C3 housing will be delivered as BtR in the short to medium term since BtR still attracts comparatively high levels of investment. The combined effect of the overall reduction in affordable housing thresholds, the proposed restrictions on affordable housing tenure, and the proposal to not allow BtR developments to deliver social rented housing is likely to compound to a significant reduction in the overall delivery of social rented housing, which may have knock on effects in relation to local authority expenditure on temporary accommodation, at a time when many councils have seen significant budget cuts. The inclusion of Social Rented housing within BtR schemes would make a significant contribution towards meeting the most acute and urgent housing needs across London. This approach would also align more closely with the NPPF's emphasis on the delivery of Social Rented homes and support the Mayor's strategic target of delivering 50% affordable housing across the capital.

The Council adopted a new BtR policy as part of its Local Plan Partial Review (2026) which facilitates the delivery of social rented housing in a separate core or block, with the remaining 30 per cent deliverable at a range of genuinely affordable rents i.e. KWLR. The policy has a cascade mechanism, which means developments that cannot accommodate the social rent portion in a separate core or

block are required to provide the social rented either off-site or as a payment-in-lieu. As the Council itself has effective partnerships and its own housebuilding programme, financial contributions towards affordable housing can be effectively translated into delivery. Continued flexibility to apply a policy of this nature would significantly improve the effectiveness of Policy HN6 by avoiding a scenario where only Discounted Market Rent can be considered, even where both the LPA and developer agree that alternative affordable housing tenures would better address needs, support deliverability (including by attracting grant) and deliver mixed and balanced communities.

In high-value areas such as Richmond, DMR can often remain unaffordable to the majority of local residents. The affordability of DMR is highly dependent on the market rent being discounted. Research by JLL[18] shows that the average Build to Rent option is 9.3% more expensive than median private rents, and therefore a 20% DMR affordable unit is likely to only be modestly more affordable than a market unit in the private rented sector. As such, if DMR is discounted at a typical 20% rate, it will remain unaffordable for the majority of the residents in the borough who cannot afford market rents, making it necessary to secure a higher level of discounting wherever possible. In this context, the policy as written is not justified or effective as it fails to specify a minimum discount rate for the DMR properties which is necessary to ensure it addresses evidenced affordable needs and contributes towards the delivery genuinely affordable housing.

For the reasons above, the Council considers that the Policy HN6 requires revisions to provide LPAs with the flexibility to support BtR developments that provide social rented housing and KWLR as part of their affordable housing contribution. Without this flexibility, Policy HN6 as currently drafted is not sufficiently positively prepared (in relation to addressing needs) justified or effective.

Proposed changes to policy HN6.B(4):

- B Development proposals for BtR development should:

  (4) provide affordable housing as discounted market rent of at least 40 per cent below market rent or Social Rent, where required by a Local Plan or agreed between the developer and borough or Mayor and ~~including~~ Key Worker Living Rent homes, in line with HN3 Delivering affordable housing, ensuring these homes are secured in perpetuity as affordable housing. Where BtR development is delivering affordable housing for Social Rent, these should be accommodated in a separate block or core.

While the Council accepts the positive role played by BtR development in the current market that is struggling with demand for housing for sale, it should be noted that the Council have seen many cases where development proposals get approved as housing for sale and are later converted to rental products after build-out (as switching from build for sale to BtR does not require planning permission). This is a problem where schemes are viability tested and include review mechanisms, as the S106 Agreements will include figures around estimated sales values that will negatively influence review formulas. In practice, entire residential blocks are often sold to a Build to Rent (BtR) operator at a

[18] JLL Evaluating Built to Rent performance Analysis of stabilised BTR data

significant discount to the aggregate value of individual open market sales. However, the higher profit assumptions associated with open market disposal, as agreed within the Section 106 agreement, often continue to be applied in the late-stage review, despite the change in delivery model. As a result, the Council recommends that the GLA officers incorporate protections against this loophole in policy HN3 as this would also improve the application of late review mechanism.
Proposed addition to policy HN3:

- HN3.D When assessing the viability of a development as part of an early, mid or late-stage review, the inputs for estimated build costs and estimated sales values should only be taken from the Section 106 Agreement if the built-out scheme matches the housing product (i.e. for rent or for sale) that was granted permission. Switching from for sale to a rental product after build-out will require a new financial viability assessment to be submitted by the applicant during an early-, mid- or late-stage review.

The Council also strongly recommends that further guidance on this matter is included within any subsequent London Planning Guidance on Viability in order to provide Councils with additional clarity.

HN7 Housing size mix

HN7.A and HN7.C(2): The Council welcomes that the draft Plan encourages LPAs to rely on local evidence to set housing mix policies for affordable tenures. However, the Council would caution against solely relying on housing registers for this evidence, as they are often heavily weighted in favour of smaller dwellings and do not necessarily reflect the challenges around finding larger affordable homes for families with complex needs. Housing registers are a 'point in time' assessment and do not account for how need is projected to change over a plan period, particularly once planned affordable housing delivery is taken into account. As a result, the relative need established by housing registers does not fully reflect the actual housing needs across different priority bands. There are also some instances of households adding themselves to housing registers multiple times which means there can be duplication. For effectiveness, the Council recommends that the reference to housing registers is removed and that emphasis is instead placed on Local Housing Needs Assessments which would typically already have regard to housing registers and planned affordable housing delivery.

Proposed change to policy HN7:

- HN7.A Plan-making authorities should take into account local evidence of need~~, including that derived through local registers for social and intermediate housing,~~ including local housing needs assessments, if preparing local policy or supplementary plans on housing size mix for affordable homes.

HN7.B: The Council is concerned that draft Plan PolicyHN7.B proposes to remove the ability of LPAs to set housing mix policies for market homes based on local evidence. Although the Council acknowledges that providing a higher concentration of one-bedroom market homes can improve the viability of a development, planning policies must balance a range of priorities, including ensuring a healthy supply of appropriately sized homes that enable people to remain in the borough where they work or have family connections as their households grow.

The evidence provided by the London's Strategic Housing Market Assessment (SHMA) is not sufficient to establish the local need for market homes of different sizes. Paragraph 193 of the SHMA states that

‘the highest volume of need in the market sector is for 1-bedroom homes (33,100 per year) and 2-bedroom homes (11,000 per year) [and that] this represents over 100% of the need for market homes and 88% of the overall need for homes.’ The London-wide SHMA does not disaggregate housing size need by borough which is considered to mask significant variation, implying a level of homogeneity which is unjustified. It is noted that the Council’s own Housing Needs Assessment, which has informed its adopted Local Plan, illustrates a much different local need for 45-50% 3-bed and 11-17% 4-beds across market homes.

Policy HO1 of the NPPF (2026) requires development plans, at the most appropriate level, to take into account an assessment of the size, type and tenure of housing needed for different groups. The need for differently sized market homes varies significantly across London and there are many boroughs, including Richmond, with significant rates of household formation in family-sized bands. For these reasons, the London Plan is clearly not the most appropriate level at which to address housing size and therefore Policy HN7 is not consistent with national policy. The restrictions imposed by Policy HN7 on the use of local evidence to inform market housing mixes is also not justified when considering that the NPPF (HO8) already requires LPAs to show flexibility on market housing mixes where affordable housing policies are met. In this context, to be positively prepared, justified and effective, HN7 should enable local policies to identify target market housing mixes that reflect local evidence, including evidence of a need for family-sized market homes. This would allow development to better meet local housing needs, while maintaining appropriate flexibility where justified, such as where an alternative housing mix would deliver greater public benefits or facilitate the optimal use of a site.

There will be many negative impacts if LPAs cannot set any requirements for 3- or 4- bedroom market homes despite local evidence showing that these are critically needed. It is also important to note that co-living developments will fill some of the need for single person accommodation as part of the wider housing supply. As a result, if the supply of self-contained housing will primarily deliver smaller units, there will be a significant reduction in the supply of new larger homes for families, including for multi-generational households. In Richmond, the Council regularly assesses applications to amalgamate smaller flats into a larger single property which result in a net loss of units. If suitable family homes are not delivered as part of new developments, the further demand for family homes may have an overall negative impact on housing completions. Taken together, if LPAs cannot set any requirements for 3- or 4- bedroom market homes, there would be significant pressure on the existing housing stock to meet the needs of all families and may push households towards less desirable options, including increased demand for affordable housing, overcrowded occupation of smaller homes, or the loss of housing through amalgamation. It may also make it much harder to retain families in inner London which would have a range of detrimental social and economic impacts. It is not clear that these impacts have been effectively appraised and so Policy HN7 cannot be said to be positively prepared or justified.

For the above reasons, the requirement stated in HN7 that only the London SHMA may be used to inform housing size mix policies in Local Plans is not positively prepared, justified, effective or consistent with national policy.

Proposed change to policy HN7:

- HN7.B Where an LPA wishes to prepare local policy or supplementary plans on housing size mix for market homes, this should be based on local evidence and London’s Strategic Housing Market Assessment.

- HN7.C Development proposals should provide a range of unit sizes, determined through:

  (2) guidance published by the plan-making authority in relation to housing size mix ~~in affordable tenures~~, and

HN8 Housing design

HN8(A.1): The Council supports the retention of the requirement to maximise the provision of dual-aspect dwellings and welcomes the stronger wording "seek to minimise the provision of single-aspect dwellings" rather than the wording in the 2021 London Plan of "normally avoid the provision of single aspect dwellings". Recognising that some degree of flexibility over the layout of developments can be helpful (e.g. where maximising the provision of dual aspect dwellings may lead to some other policy tension), the wording in A.1. that requires any single aspect dwellings to have adequate ventilation, daylight, and privacy and avoid overheating is strongly welcomed.

HN8(A.3): The Council supports the addition of the requirement for developments to be tenure blind in relation to the external appearance of affordable and private housing units and agrees that this helps foster a sense of comfort and belonging for all residents (as asserted in supporting paragraph 3.104). The Council also supports the requirement in part A.3 for all housing entrances to be well integrated and indistinguishable from each other (regardless of tenure). However, the Council notes that greater safeguards may be needed to avoid higher service charges being levied on affordable tenures (or potentially higher rents for tenures where service charge is included in the rent).

HN8(A.6): The Council supports the encouragement for developers to provide play space on-site. However, Part A.6 of the policy may have implications for viability and layout, due to the requirement for a minimum of 10sqm play space per child in any given development. This minimum requirement is itself supported but the requirement for this to be delivered on every site has the potential to require a proportionately significant amount of land, which would reduce the amount of land available to accommodate units themselves, and may therefore reduce the viability of a scheme or require inappropriate densification of the rest of the site to compensate. For some forms of residential development, this requirement can also lead to play spaces being delivered which are ultimately privatised and exclusionary of residents who do not pay a service charge. In light of this, it may be prudent and more inclusive for the policy to better recognise the potential for off-site or cumulative provision in an area where, for example, multiple developments are being delivered close by or the development is within walking distance of an existing public play space in need of investment. This could also involve the provision of a new, higher quality, more diversified and ultimately larger play space on one site that caters for the needs of multiple contributing developments within walking distance. It is appreciated that supporting paragraph 3.101 states that formal play provision should normally be made on-site and paragraph 3.102 goes on to say that off-site provision may be acceptable, however the onus within the policy itself is that the provision is on-site. To make the policy more effective, it is recommended that the wording of the policy is amended:

> A.6 "incorporate at least 10 square metres of good-quality and accessible play space per child on-site, or off-site or through cumulative provision where on-site delivery is not practical

This amendment will make it clearer to applicants that off-site or cumulative provision is capable of justification in certain circumstances. The Council also notes that stronger safeguards may be required

to avoid higher service charges being levied on affordable tenures, or potentially higher rents for tenures where service charge is included in the rent.

HN8(B.2): The Council strongly disagrees with the reduction of the minimum floor to ceiling height from 2.5m (as it is in the 2021 London Plan) to 2.4m for 75% of the gross internal area (GIA) for each dwelling. The Council does not consider that there is adequate justification for this reduction, which will have a noticeable negative impact on the comfort and the liveability of a dwelling. The rationale provided in supporting paragraph 3.108 does not seek to justify the reduction, but rather states that the "minimum floor-to-ceiling height of 2.4m in new housing helps ensure they provide adequate quality…and sense of space." If this is the aim, the Council's view is that the existing requirement for minimum 2.5m floor to ceiling height for 75% of the GIA should be retained on the basis that it achieves this aim to a better standard. The Council appreciates the overarching requirement of the London Plan to optimise sites and layout of dwellings, however if optimisation is seen as a justification for this reduction then this should be made much clearer as part of the supporting evidence base, with an opportunity to scrutinise the perceived benefits of the change. In the absence of this evidence, the Council's view is that this reduction is unlikely to have a tangible impact on the number of dwellings a site can accommodate in the vast majority of cases.

HN8(D): The Council supports the new requirement that, where practical, family homes should predominantly be located on the lower six floors of tall residential buildings to improve access to outside play and amenity space. It is important that this policy gives LPAs flexibility by including the wording "where practical", as viability implications, or design and layout configurations relating to units of different tenures and sizes, may mean that alternative scenarios which lead to a better overall outcomes (e.g. higher levels of affordable housing) may be achieved by allowing some delivery of family housing on higher floors. This in addition to the focus on wheelchair accessible homes being located within the lower floors which will need careful balancing from decision makers.

Supporting paragraph 3.103 and 3.109: It is appreciated that this part of rationale is connected to the implementation point presented in paragraph 3.103, however the policy needs to place greater emphasis on the issue of service charges for affordable tenures likely increasing as a result of tenure blind building entrances and on-site provision of play space. The policy, or London Plan Guidance, should consider and mitigate against the risk of developers imposing high service charges upon affordable housing tenants to cover the maintenance of communal aspects of a development. In this context, the Council is considered that the wording in supporting paragraph 3.103 is too lenient by simply listing matters that can be considered. As mentioned in earlier comments, without care or mitigation, the requirements of this policy, whilst individually justified, could result in increased service charges or rents for affordable tenures (Social Rents are not inclusive of service charge, whereas some intermediate rented tenures include service charge within the rent). High service charges will continue to be a barrier to people wishing to purchase units at market or affordable rates, and therefore it is imperative that this is addressed to ensure the success of developments.

HN9 Accessible housing

The Council is supportive of the updated requirements in HN9(A) that require at least 10% of affordable homes to be M4(3)(2b) wheelchair accessible. This is important to ensure that prospective tenants or owners of affordable wheelchair-accessible units have homes that are ready to move into and do not require additional time or expense to make them wheelchair accessible. The Council also supports that

this requirement is applicable to all affordable homes and not just social rented homes, as the ability to move into wheelchair accessible homes is important for residents occupying all affordable tenures. For example, renters or owners of intermediate homes are less likely to be eligible for the Disability Facilities Grant due to having moderately higher incomes, yet many households use the Disability Facilities Grant to build out their unit as accessible when it is not readily accessible at occupation (i.e. when the unit is not built to M4(3)(2b) standards). It is therefore important that residents of intermediate tenures (as part of affordable housing) are also covered by policy HN9(A.1).

The policy requirement set out in HN9(A) aligns with the requirements of the Richmond's Intermediate Housing Policy Statement (IHPS)[19], which states that developers should deliver 10% of intermediate homes as M4(3) wheelchair accessible units that are fully accessible prior to occupation where they are rented or purchased by wheelchair users. The Richmond IHPS further states that these M4(3)(2b) units should be evenly distributed across all intermediate tenures and bedroom sizes to prevent developers from defaulting to only providing M4(3)(2b) units as 1-bed units, as this is usually the most viable option for them. As a result, the Council is supportive of Policy HN9(B.1) which ensures that wheelchair users of all household sizes (including families) can benefit from having wheelchair accessible units. The Council recommends that the requirement set out in HN9(B.1) is further specified to ensure that it applies to both M4(3)(2a) and M4(3)(2b), since it currently only refers to M4(3) generally, and developers could interpret this as only applying to M4(3)(2a) wheelchair adaptable. Similarly to the IHPS, the Council appreciates the need for the policy to state that accessible units "should be" distributed evenly across tenures and bedroom sizes, rather than "must be", reflecting the viability implications associated with delivering larger wheelchair-accessible homes.

To improve effectiveness, the Council would also recommend that the following addition is made to HN9(B.1):

> "be delivered across a range of housing sizes, with the housing mix informed by discussions with the Local Authority and/or Registered Providers".

This is important as local authorities usually have information about who on the housing waiting list requires a wheelchair accessible property and the sizes of homes required. In Richmond, the Council has previously worked with developers to provide larger wheelchair-accessible homes for identified households, with the flexibility for these units to be reconfigured into smaller dwellings in the future if circumstances change. The Council's view is that early discussions with developers can result in beneficial solutions that better meet identified housing needs and the ability for planning policy to advocate for these early discussions is critical to the effectiveness of the policy as a whole.

The Council also supports the retention of the requirement for 10% of market homes to be M4(3)(2a) wheelchair adaptable, whilst the remaining 90% of the homes are required to meet M4(2) 'accessible and adaptable dwellings' standards. However, for effectiveness, the Council suggests clarifying the wording of HN9(A.3) to state

> "ensure ~~all other homes~~ the remaining 90% of homes within the scheme meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'"

[19] LBRuT Intermediate Housing Policy Statement (2025, updated March 2026)

This is necessary because the wording of part A.1 and part A.2 as "10% affordable homes" followed by "10% market homes" may be read as a total of 20% of homes in any given development. Including "remaining 90% of homes" in part A.3 will clarify to the reader that parts A.1 and A.2 refer to 10% of homes overall.

The Council also supports HN9(B.4) which requires that wheelchair accessible and adaptable units are directly marketed to disabled people for at least the first four months prior to completion and at least two months post completion. The Council has seen cases where developers claim that they need to retrofit wheelchair accessible units back to M4(2) standards because they have had no interest from wheelchair users. At times, developers have also claimed that they should not be required to provide the policy compliant level of M4(3) units due to the expectation that they will not have an appropriate number of wheelchair-user residents expressing interest in the units. The Council's observation is that this is often driven by poor marketing strategies that do not prioritise households who are wheelchair users. The inclusion of HN9(B.4) in the draft Plan provides a clear requirement for developers to actively market to wheelchair users.

The Council is supportive of HN9(D) which resists the loss of wheelchair user homes. The Council recommends that the policy is further developed to require a commuted sum to be paid by the developer in the case of a loss of M4(3) wheelchair user homes. This would mean that if a development results in the loss of wheelchair user units, or if a developer does not provide the policy-compliant level of wheelchair user units, then the developer is liable to pay a commuted sum to the Council equivalent to the value of the square meterage by which the unit falls short to meet M4(3) standards plus the value any missing accessible bathrooms. The commuted sum serves as a form of mitigation that can be used to improve accessibility features in other developments. For example, these funds can be used to provide a standard of accessibility over and above the minimum standard, such as the installation of height-adjustable work-surfaces in the kitchen. The funds can also be used for accessibility features in the communal areas of other developments. The Council further suggests that a commuted sum contribution could be used where 10% of units in a development that are provided to M4(3) standards results in an incomplete number of units – e.g. 10% of 36 units would require 3.6 units to be M4(3). In such a case, the developer could provide 3 units as M4(3) and the remaining 0.6 unit as a commuted sum contribution. The addition of this requirement in the London Plan would provide a further incentive for developers to provide policy-compliant levels of M4(3) units and support boroughs in providing accessible units or infrastructure elsewhere if this requirement is not met by other developers. If it is not viable for the development to provide a policy compliant level of accessible units, the policy requirement could be used to incentivise the developer to seek other funding sources to support the delivery of a policy compliant level of accessible units. For example, boroughs could contribute towards part of a unit using commuted sum funds, which in the above example could be used to fund the remaining 0.4 of a unit. As such, HN9 should include policy wording that requires developers to seek out funding opportunities to maximise the level of wheelchair accessible units where possible.

To address these points, and improve effectiveness, the following modification is proposed:

> D. Development proposals that result in a loss of wheelchair user homes should be resisted, unless they are replaced by at least the existing overall floorspace within the same tenure. In exceptional circumstances where proposals resulting in a loss of wheelchair user homes are approved, mitigation in the form of a commuted sum should be provided by the developer proportionate to the number of wheelchair user homes (and accessible bathrooms) to be lost.

The Council is supportive of HN9(G), which encourages the provision of wheelchair accessible or adaptable units on upper floors where a building has two or more lifts. The Council recommends that the policy requires a minimum of two lifts in any residential buildings that have wheelchair accessible or adaptable units on upper floors.

Related to this, the wording of supporting paragraph 3.112 is not clear since it states: "For buildings with only one lift, priority must be given to locating M4(3) on the ground floor wherever possible, however wheelchair user dwellings on lower floors (typically defined as floors 1 – 6) may be acceptable" – this suggests that it is acceptable for a building to have only one lift, even if a wheelchair accessible unit is provided on floors 1-6. No M4(3) units should be located above ground floor in any building that only has one lift. The Council suggests that this sentence is removed from supporting paragraph 3.112 to ensure that developers do not consider it acceptable to provide M4(3) units on any other floors than the ground floor if the building only has one lift.

To improve effectiveness, the following modification is proposed:

> G. Wheelchair-accessible and/or adaptable student bedrooms should be delivered across a range of tenures and buildings and, where possible, be prioritised on the ground floor. ~~with provision on upper floors also supported~~ Only where buildings have two or more lifts should provision on upper floors be supported.
>
> 3.112 [...] For buildings with only one lift, priority must be given to locating M4(3) on the ground floor wherever possible~~, however wheelchair user dwellings on lower floors (typically defined as floors 1 – 6) may be acceptable, with preference given to the lower of these floors~~. Only where buildings have two or more lifts should provision on upper floors be supported

The Council supports HN9(I) which requires that Design Access Statements (DAS) should be approved by an access professional, and in particular that these professionals are flagged as housing Occupational Therapists or access consultants accredited by the National Register of Access Consultants. It is unclear why this requirement is only set for schemes of 36 units or more, as this number seems arbitrary. The Council believes it is more appropriate to seek professional advice on schemes of all sizes, or alternatively a much lower threshold (such as 10 units).

To improve effectiveness, the following modification is proposed:

> I. ~~To meet accessible housing requirements in schemes of 36 homes or more,~~ For all developments subject to this policy, applicants should ensure the ongoing involvement of an access professional to support compliance from conception to completion and the design and access statements (DAS) should be approved by an access professional48

Table 3.8: The Council is supportive of the requirement that developments must meet the minimum space standards for wheelchair-user M4(3) dwellings. However, the minimum standards used in Table 3.8 appear to be based on the Housing Standards Review 2013 minimum areas. These areas, especially those set for 1- and 2-bed homes, are extremely small, which means they can make it more difficult for a development to meet Building Regulations 2010 Approved Document M Volume 1 (ADM1)[20] requirements. Recent ADM1 research shows that many wheelchair users cannot manage the smaller

[20] Statutory guidance: Access to and use of buildings: Approved Document M

space and transfer zones as prescribed in the Housing Standards Review 2013. As a result, the Council believes these minimum requirement figures are now outdated and too small for the minimum turning circle requirements for a standard sized wheelchair, which is 1800mm. It is recommended that Table 3.8 provides minimum space standards as a range of sizes, as in the Habinteg Inclusive Housing Design Guide[21] or the Northern Ireland Housing Executive Development Guide Design Standards[22]. These standards provide an acceptable range, for example 60-65sqm for a 1-bed/2-person, 80-85sqm for a 2-bed/3-person etc. The Council would also like to note that the inclusion of 1-bed/1-person unit in the Table 3.8 is not necessary, as most local authorities such as Richmond would not accept a 1-bed/1-person wheelchair accessible unit. Generally, boroughs assume that at least two people would be living in a wheelchair accessible unit or at least provide for the fact that a wheelchair user may have a change in circumstance which means an additional person moves in with them – if they were in a 1-bed/1-person unit, this would mean the Council would have to seek alternative provision for them, causing unnecessary upheaval. Nevertheless, the minimum requirement for a 1-bed/1-person unit in Table 3.8 is 48sqm, which falls short of ADM1 guidance. If a 1-bed/1-person unit is to be included in Table 3.8, it should require 58sqm as the minimum standard, as this would allow for a more resilient wheelchair accessible housing stock in the longer term.

Supporting paragraph 3.120: The Council recommends that this paragraph also includes the requirement for bathrooms in LSPBSL units to be built to ADM1 standards. These units will be lived in for some months or years and need to be laid out with the needs of the wheelchair users in mind.

Supporting paragraph 3.130: This paragraph should be further developed. While the paragraph acknowledges the needs of neurodivergent residents, it does not set out any corresponding solutions, requirements, or guidance on how those needs should be addressed. Greater emphasis should therefore be placed on this section, with a clearer link to a specific policy requirement within HN9 that responds to the accessibility needs of Londoners beyond those with physical disabilities.

While the Council is broadly supportive of Policy HN9, the policy appears to be predominantly focused on residents with physical disabilities, and in particular wheelchair users. Although these provisions are important, consideration should also be given to a wider range of accessibility needs, including those of neurodivergent residents and others who may experience barriers to accessing suitable housing. The policy would be strengthened by recognising and addressing this broader spectrum of accessibility requirements. These considerations within the housing stock are often very easy to make as part of the original build but become far more costly as part of a retrofit.

The Council proposes the following text is added to the rationale:

> Adaptable and accessible homes support independent living, healthy ageing, and community cohesion by enabling residents to remain in their homes as their needs evolve. This can reduce reliance on specialist accommodation and help alleviate pressures on health and social care services. Providing accessible and adaptable housing at the point of construction is also considerably more cost-effective than retrofitting homes once accessibility needs arise.

[21] Habinteg (2024) *The Inclusive Housing Design Guide*. London: RIBA Publishing.
[22] Department for Communities (2009) *Northern Ireland Housing Executive Housing Association Guide – Development Guide Design Standards, Table 4: Wheelchair housing – TCI area/cost*.

HN10 Burial space

The Council broadly supports Policy HN10 and welcomes the recognition of the strategic need to proactively plan for the long-term provision of burial space. The Council considers that the Mayor should play a stronger coordinating role in facilitating how strategic needs will be met and cross-boundary cooperation, particularly given the uneven distribution of burial capacity and future demand across the capital. The Council also considers that the policy and/or the supporting text should recognise the significant lead-in times associated with bringing forward new burial provision and therefore support the early identification and safeguarding of suitable land to meet future needs.

The Council supports the policy's recognition of cultural and faith-specific burial needs and the importance of ensuring burial provision remains reasonably accessible to the communities it serves. The Council also particularly supports the requirement for burial space proposals to demonstrate compatibility with wider environmental strategies and local green infrastructure enhancement. In this regard, the Council considers that the policy and supporting text could more explicitly recognise the contribution that cemeteries make to biodiversity, urban greening, tree canopy cover, climate resilience and wider green infrastructure objectives. Greater recognition of these wider benefits would better reflect the role that cemetery provision can play in delivering both essential social infrastructure and long-term environmental enhancement.

The Council notes that the re-use and reclamation of graves as a means of extending burial capacity is a complex and sensitive issue that extends beyond the scope of planning policy and will need to be considered in the context of any future national guidance or legislative changes arising from the Law Commission's 2026 report on Burial and Cremation.

Chapter 4 - Growing London's economy in a way that benefits all

GLE1 Sufficient and appropriate employment space

The Council broadly supports the overall objectives of Policy GLE1 and welcomes the emphasis on ensuring that London continues to provide sufficient and appropriate employment floorspace to meet the needs of a diverse and evolving economy. In particular the Council supports the recognition of the need to accommodate a range of business types, sizes and sectors, including small and medium-sized enterprises (SMEs), together with the promotion of flexible and adaptable commercial space. The Council welcomes the publication of the London-wide Economic Uses and Supply Demand Study (2026), which underpins the approach to economic policies in the draft Plan and broadly aligns with local evidence regarding employment floorspace demand and the need to ensure a sufficient and appropriate supply of employment space through plan-making.

However, the Council is concerned that despite the Economic Uses and Supply Demand Study (2026) identifying continued demand and need for office floorspace across London, the policy itself provides very limited strategic direction in relation to offices. While the policy contains specific provisions relating to uses such as life sciences, light industrial floorspace, creative workspace and social infrastructure, there is no equivalent policy approach to support, protect or plan positively for office accommodation, despite the study identifying a need for additional office provision in many parts of London (including Richmond). This concern is reinforced by the absence of a dedicated office evidence

study (equivalent to the London Office Policy Reviews that informed previous London Plans), particularly given the need to understand the long-term implications of post-pandemic workplace trends for office locations outside the CAZ and how the investment required to improve the energy performance of older office stock may influence its future retention and use.

Given the continued importance of office-based sectors to London's economy and the evidence underpinning the draft Plan identifying demand for office floorspace, the Council considers that the policy should provide clearer strategic guidance on how boroughs should plan for, retain, intensify and grow office capacity or, where robustly justified, support its release for other uses, particularly given the historic and ongoing loss of office floorspace through permitted development rights, the flexibility of Class E, and wider pressures on land use arising from the need to balance the retention and provision of employment space with the delivery of much-needed housing.

Policy E1 (Offices) of the existing London Plan has been useful in assessing proposals for existing office sites, and its absence from the draft Plan could be perceived as a lack of priority for this type of employment floorspace, which could lead to greater pressure for non-economic uses on these sites. While greater flexibility is afforded for change of use between commercial uses within Class E, the Richmond Local Plan continues to distinguish between offices and industrial land when assessing future employment needs and sets out separate policy approaches for these different forms of employment floorspace, recognising that office floorspace is often subject to distinct development pressures (recognising the practical reality that, for example, larger purpose-built office buildings are often more likely to come under pressure for alternative forms of development, including residential use, than for other Class E uses).

The Council therefore recommends that further consideration is given to strengthening Policy GLE1, or reintroducing a dedicated office policy, to provide a clearer strategic approach to office floorspace. This would help ensure greater alignment between the policy framework and evidence base and support the long-term needs of London's office-based economy while balancing this with the need to deliver housing and accommodate other land use priorities.

Richmond town centre has been recognised in the current London Plan and the new London Growth Plan[23] as a regionally significant office cluster that the borough has sought to protect through its policies, designations and site allocations. Local Plan policies have taken a protectionist approach to existing offices in the borough, though levels of office vacancies have increased following the pandemic. It remains unclear if the pandemic has led to structural change in the office market, or if there continues to be a need to retain a long-term reserve of this type of floorspace to absorb future demand.

The borough has continued to lose office floorspace despite the protective policies in the Local Plan. The Council's Employment Floorspace Monitoring 2022-23 (January 2024)[24] found that over the ten-year period since 2013-14 over 113,000sqm of office floorspace was lost. The amount of office floorspace in the borough has been particularly impacted by the introduction of permitted development rights for

[23] London Growth Plan (2025)
[24] LBRuT Employment Floorspace Monitoring report 2022/23

offices/Class E, and the Council has a modified Article 4 Direction in place to manage further losses in key employment locations.

Due to the nature of the borough and its significant constraints, there is very limited scope to provide any new economic floorspace at scale through development, and therefore the policy focus is on protecting the remaining employment sites (offices and industrial) from redevelopment for other non-commercial uses. To address the shortfall identified, for the Plan period (2019-39) through the employment evidence base studies of 23,000 sqm of office floorspace (Employment Land and Premises Needs Assessment, 2021 and 2023)[25].

The challenge is particularly acute in a borough like Richmond, where there is significant pressure for the redevelopment of these sites for higher-value non-economic uses. This is particularly the case for older office floorspace in need of upgrading to meet modern environmental standards, where developers often seek to pursue residential redevelopment rather than continued economic use, despite Class E, in principle, encouraging retention within employment-generating uses through the flexibility it affords. This has been the case even where sites are well located in town centres and benefit from good public transport accessibility.

The findings of the Council's own economic evidence base studies appear to generally correspond with the London Economic Uses Supply and Demand Study (July 2026)[26] which identifies demand for an additional 26,200sqm of office floorspace and 25,800sqm of research and development (R&D) floorspace in Richmond under the central scenario from 2024 to 2050.

The Council notes that draft Policy GLE1(E) appears to seek to limit the use of planning conditions restricting changes of use within Class E in new developments to specified circumstances. However, it is the borough's experience that, given the relatively limited amount of new large-scale economic floorspace coming forward, such conditions can be an important tool in maintaining an appropriate balance of uses and delivering wider planning objectives. The Council therefore questions whether this part of the policy adds significant value, particularly given that the use of planning conditions is already guided by national policy, guidance and legislation.

The Council supports Policy GLE1(F), which seeks to mitigate the displacement of small and independent businesses by encouraging their re-provision within new developments or, where this is not feasible, supporting their relocation. However, some of the observations made elsewhere in this consultation response, including in relation to office floorspace and industrial land release, should be taken into account as the continued loss of employment floorspace across a range of uses (particularly secondary and more affordable stock) and increasing pressure to deliver much-needed housing may reduce future opportunities for the re-provision and relocation of displaced businesses.

GLE2 Supply of industrial land

The Council broadly supports the overarching objective of Policy GLE2, which requires boroughs, through their Local Plans, to provide for and maintain sufficient industrial capacity to meet strategic needs in the most suitable locations and to review the boundaries of industrial designations, where appropriate, through future Plan reviews. The Council also supports the principle of identifying and

[25] Richmond Employment Land and Premises Needs Assessment 2021 and 2023
[26] GLA London Economic Uses – Supply and Demand Study (July 2026, amended September 2026)

designating additional industrial sites where justified. However, the Council considers that opportunities to identify and designate additional industrial land (as set out at Policy GLE2(D)) are likely to be limited, particularly in boroughs such as Richmond where larger industrial sites are already designated, with some also subject to existing redevelopment proposals (including for non-industrial development and regeneration projects). Whilst some remaining undesignated industrial land may warrant consideration, such sites are likely to be small in scale, fragmented and interspersed with other land uses.

Draft Policy GLE2(A) refers to strategic benchmarks for storage and distribution uses across London's Property Market Areas (PMAs), with Richmond located within the Park Royal/A40/Heathrow PMA. These benchmarks are derived from the London Economic Uses Supply and Demand Study (2026), which at borough-level indicates that storage and distribution floorspace demand is 49,000sqm in Richmond from 2024-2050, which is consistent with the Council's most recent evidence base which identifies a significant demand for industrial floorspace.

These storage and distribution benchmarks are based on assumptions that future demand can be accommodated through efficiency improvements and more intensive use of existing industrial land (although the practical scope for delivering such improvements will vary significantly between sites). Whilst the Council recognises the strategic importance of planning for storage and distribution uses and the need to intensify existing industrial sites in suitable locations, achieving the identified benchmarks may prove challenging given the limited availability of suitable sites capable of accommodating the scale of intensification anticipated, particularly in Richmond where much of the existing industrial land supply is interspersed with established residential neighbourhoods.

The Council is also concerned about the direction of travel of the draft Plan in relation to existing industrial land across London, particularly when Policy GLE2 is considered alongside Policy PV5 (which promotes the de-designation and release of industrial land in well-connected locations to support housing delivery). Further detailed comments on Policy PV5 are provided later in this consultation response. In the context of Policy GLE2, the Council considers that the requirements of Part B are unlikely to be effective in practice. This is because they direct boroughs to produce strategies to meet their industrial land needs whilst simultaneously instructing them to release significant quantities of existing industrial land for housing, and because they require boroughs to work with other boroughs in their PMA to plan for compensatory provision before they release that industrial land for housing through their local plans. There appears to be no direction provided as part of the draft Plan as to where within PMAs compensatory provision should be provided, or any evidence that each PMA has the capacity or opportunities to deliver compensatory provision to off-set the land assumed to be released as part of each borough's housing target. In the absence of evidence to the contrary, the Council considers it highly unlikely that it will be possible to deliver meaningful compensatory provision on a cross-boundary basis, and notes that, in the absence of compensatory provision, Part B instructs the Council to not release that industrial land through its local plan, which raises fundamental questions around the deliverability of the strategy as a whole.

Notwithstanding the comments above, the Council recognises the importance of planning for industrial demand on a strategic basis, including through coordination within and between London's industrial PMAs, which is supported in principle. However, the Council is generally cautious about approaches that seek to offset the release of industrial land within London's urban area with sites on the edge of London and within the Green Belt. The Council encourages the Mayor to carefully consider whether

such an approach could undermine local economies by displacing jobs, reducing the diversity of uses within local areas, and increasing the need for travel between inner and outer London, with consequent implications for transport infrastructure and climate change objectives. The Council notes that the supporting evidence base does not appear to adequately assess the wider socio-economic implications of industrial land release and redistribution, including the extent to which these could affect local employment and economic resilience.

As noted in the Council's response under policy GLE1, in Richmond there is very limited scope to provide any new economic floorspace through development, and therefore the policy focus in the Local Plan continues to be on protecting the remaining designated and non-designated sites from redevelopment for other non-commercial uses, to meet the needs identified through the employment evidence base studies (Employment Land and Premises Needs Assessment, 2021 and 2023).

Richmond does not contain any Strategic Industrial Locations (SILs), but it does designate Locally Important Industrial Land and Business Parks (LIILBPs), the local terminology for Locally Significant Industrial Sites (LSISs) as required by the current and draft Plans. The Council's employment evidence (the Employment Land and Premises Needs Assessments, 2021 and 2023) found that the borough has very low vacancy rates for industrial land and that its locally designated industrial sites are generally well occupied and in good condition. Evidence of low vacancy rates both within the borough and across London is also reflected in the London Industrial Land Supply Study 2020 Main Report (March 2023)[27].

The evidence undertaken to inform the Richmond Local Plan (Employment Sites and Premises Needs Assessment 2021, updated 2023) found that there was an additional requirement for 60,000 sqm of industrial floorspace for the forecast period 2019-39 and that the borough had continued to lose industrial stock (VOA recorded a total stock of 163,000 sqm in 2015, falling to 141,000 sqm in March 2022).

The London Economic Uses – Supply and Demand Study (July 2026) also identified an industrial shortfall in the borough of 9-11 hectares up to 2050, with storage and distribution representing the greatest source of future industrial land (9ha).

The borough lacks sites for the development of significant new employment space and is challenged in its ability to deliver the intensification of industrial space (as supported by the London Plan), due to existing industrial sites being commercially successful, generally being in reasonable condition and well-let, thereby reducing the commercial incentive to redevelop them. Owing to the nature of the borough and historic patterns of development, employment sites are often located within mixed-use and residential areas, which can significantly constrain opportunities for intensification due to access and amenity considerations, as well as potential impacts on local character and the historic environment.

In addition, the Council is concerned that combined the approaches set out in Policies GLE2 and PV5 could undermine the long-term economic function of designated industrial land that may not necessarily be performing a traditional industrial function at present, but which nonetheless supports strategically important economic activity and remains worthy of protection. This is particularly relevant in relation to activities associated with growth sectors and places identified in the London Growth Plan,

[27] London Industrial Land Supply Study

such as screen production and R&D activity, many of which will be located on designated industrial sites and rely on the continued availability of protected employment land.

The re-focusing of the draft Plan away from encouraging industrial co-location with residential uses is welcome, particularly the removal of policy mechanisms through which residential development could be considered acceptable on LSIS sites. In Richmond, where industrial sites are generally smaller and more fragmented, the existing approach is considered more likely to generate pressure for residential encroachment within industrial areas than to facilitate the delivery of successful mixed-use developments.

With regard to the development management elements of the policy, the Council welcomes the approach set out in Policy GLE2(F) regarding the uses that should be supported within SIL and LSIS. The focus on Class B2, Class B8, sui generis industrial uses, and Class E(g)(ii) and E(g)(iii) uses will help safeguard the industrial function of these areas and support the retention of industrial capacity across the borough.

Industrial intensification under GLE2 Parts G and H is supported in principle (where it responds appropriately to the site's context and operational requirements and can be accommodated without creating unacceptable impacts on surrounding uses) and aligns with the objectives of the Council's Local Plan. However, the Council's experience is that delivering industrial intensification can be challenging in practice due to various site-specific constraints, neighbouring uses and agent of change principles, operational, fire safety and environmental requirements and fragmented landownership. In addition, the Council notes that London Plan Industrial Evidence Paper (September 2026)[28] states "*There is limited evidence about successful intensification in terms of floorspace or land supply and therefore no specific figure has been put on the scale of the contribution this can make to industrial supply*." As such the Council would question the deliverability and effectiveness of an approach to industrial land provision that is partially dependent upon the delivery of highly ambitious land efficiency savings across London, particularly where these savings have already been factored into evidence base on future industrial land demand.

Further clarification is required in relation to the intent of Policy GLE2(H). It is unclear whether the policy intends for intensified floorspace to be prioritised for particular uses (such as Class B8). If this is the case, the policy should state this explicitly. The policy and/or supporting text would also benefit from greater clarity regarding how applicants are expected to demonstrate that proposals would free up industrial capacity to help meet identified strategic needs elsewhere, and what evidence would be required to support this assessment.

GLE3 Data centres

The Council welcomes the introduction of a standalone policy for data centres and supports their separation from the broader industrial land policy framework given that data centres have distinct locational, operational and infrastructure requirements.

The Council supports the principle that the process for identifying suitable locations for data centres should be plan-led, taking account of factors such as electricity and water capacity, opportunities for clustering, and heat recovery. There are obvious risks and threats presented by an alternative

[28] GLA: London Plan Industrial Evidence Paper (September 2026)

development management-led approach in that the space-, energy- and water-hungry nature of many data centres means there is a risk of displacing other priority needs or creating a spatial disconnect between planned grid and utility capacity and future demand. In particular the Council also welcomes Policy GLE3(C), which encourages boroughs to identify opportunities for data centres to deliver local benefits and contribute towards mitigating impacts on affected communities.

The Council recognises the growing importance of data centres as critical digital infrastructure and the need to accommodate future demand. However, given the rapidly evolving nature of the sector, there remains significant uncertainty regarding the scale and distribution of demand over the Plan period (which is acknowledged in the draft Plan). It is unclear from the supporting evidence base, *London's Data Centre Future Growth Forecasts and Strategic Insights (2025)*[29], what role individual boroughs are expected to play in meeting this demand. In the absence of a strategic benchmark, target or indicative distribution, it is difficult for boroughs to determine the scale of provision that Local Plans should seek to accommodate which heightens risks of a development management-led approach arising in practice if ultimately the scale of provision planned for is inadequate. If, ultimately, boroughs should produce their own evidence of local data centre needs to inform the scale of provision to be planned for then Policy GLE3 should say this explicitly.

The Council also notes that Policy GLE3(B) requires boroughs that are unable to identify suitable locations to first collaborate with neighbouring authorities and then consider locations within the Grey Belt or on the edge of Broad Locations for Growth in the Green Belt. Without greater clarity regarding future demand and its expected distribution, it is unclear when such measures should be pursued or how boroughs should determine whether they have adequately planned for data centre development, including whether it would be reasonable to conclude that there is no requirement, or no suitable opportunity, for data centre provision within their administrative area. This uncertainty also creates a risk that data centre proposals could come forward opportunistically across London, rather than as part of a planned and coordinated approach aligned with the Spatial Strategy.

This uncertainty is particularly relevant in boroughs such as Richmond, where, according to the supporting evidence base, there are currently no operational or proposed data centres, and the borough is not located close to existing or emerging data centre clusters. In these circumstances, opportunities for new data centre development are likely to be extremely limited. Any data centre proposals that do come forward may place additional pressure on existing industrial land, potentially creating tensions with other economic development priorities and employment land requirements.

The Council notes criterion GLE3(A)(5), which requires plan-making authorities to consider compliance with the Habitats Regulations in relation to air quality impacts on Epping Forest Special Area of Conservation (SAC). Whilst the Council recognises the rationale for addressing the potential impacts of emissions from data centre backup generators, and the qualifying features assessed for the Epping Forest SAC in the HRA, it is not clear if this has been assessed for other SACs when considering the air quality pathway (such as Richmond Park SAC and Wimbledon Common SAC), or designated nature conservation sites more generally. Whilst the Council notes the supporting text at paragraph 4.42, the Council considers that further justification should be provided for this distinction, or alternatively the

[29] London's Data Centre Future Growth Forecasts and Strategic Insights (2025)

policy should be broadened to ensure that equivalent consideration is given to all relevant SACs and other designated nature conservation sites where similar impacts could arise.

The Council's view is that for the Plan's approach to data centres to be effective and sound as part of its wider spatial strategy, Policy GLE3 must incentivise the uptake of proactively identified suitable locations for data centre development and provide safeguards against speculative development on unidentified, or discounted, locations, particularly where these locations have been allocated for, or are otherwise, required to meet other needs. In this context, the Council notes that criterion GLE3(E) sets out tests for data centres coming forward outside of locations proactively identified as suitable in local plans. The Council is concerned that many of the criteria set out in GLE3(A) are not listed in (E), including the need to avoid locations that would compromise the supply of land for local housing, employment or infrastructure needs. Implicitly, this means that speculative proposals for data centres outside of plan-led locations could be subject to a lower level of scrutiny than those proactively identified through plans. Whilst it is recognised that it may be the Plan's intention that GLE3(E)(1) addresses this point, the Council considers that the wording "justify the proposed development location" is too vague and does not make clear to a decision-maker what it means for a location to be justified. The Council's view is that it should be made more explicit that the criteria set out in GLE3(A) should also be applied to proposals at the development management stage for locations that have not already been included in plans. Without this criteria, the Council's view is that the policy risks compromising each borough's ability to safeguard land for housing, industrial and employment purposes in relation to speculative data centre developments. Consequently, it is therefore not positively prepared, justified or effective.

Suggested modifications:

- GLE3(D) - Development proposals for data centres in suitable locations (as identified in local plans) should be supported in principle.
- GLE3(E.1) - justify the proposed development location against the locational criteria in Part A, and demonstrate mitigation of adverse impacts including on infrastructure capacity needed to support growth in the area

The Council has concerns regarding the inclusion of Grey Belt land within the policy's locational criteria. Policy GLE3 appears to provide a pathway for data centre development on grey belt land outside identified Broad Locations for Growth (BLGs) that is not available to most other forms of development in the draft Plan. Whilst the supporting text to Policy PV7 explains that this reflects the distinct operational characteristics of data centres, including lower trip generation and opportunities for heat recovery, the Council considers there should be priority to a plan-led approach to directing to the most sustainable locations, to avoid opening the door to ad-hoc proposals. In this regard, the Council considers that the use of Grey Belt, and particularly Green belt land, should be pursued only as a clear last resort where it has been robustly demonstrated that there are no suitable and available sites within BLGs, industrial locations, previously developed land, or other non-Green Belt locations capable of accommodating the proposed development. The policy should more clearly reflect a sequential approach to site selection to ensure that the exceptional circumstances of data centre development does not inadvertently undermine the strategic objectives of Green Belt protection.

GLE4 Night-time economy

The Council notes that Policy GLE4 provides continued support for the night-time economy and night life uses. This aim is in line with the Council's published Night Time Strategy[30] and Richmond Growth Plan[31]. Draft Policy GLE4's references to public houses (parts A.6 and B.4, 5 and 6) is supported and is consistent with the approach taken in the Richmond Local Plan, which recognises their important community, cultural and economic role.

The Council welcomes the continued support for diversification of night-time uses which should be accessible and safe for all (part B.2), and the application of the agent of change principle and also support reference to mitigation measures (part D).

Not all areas are suitable for concentrations of late entertainment night uses and it is noted that draft Policy PV3 provides a policy approach to consider the over-concentration of types of uses (Policy PV3 B.5) as well as acknowledgement of there being potential locations where they may be appropriate (Policy PV3 B.2) subject to the provision of '*complementary measures to support their safe and effective functioning*'.

The Council notes that there are Cumulative Impact Policies in place under licensing powers which restrict new drinking establishments in Richmond and Twickenham. In this context, the cumulative impact of additional night-time premises is considered, not just because of the potentially detrimental impacts of such developments on in particular residential amenity, but also the impact on the high street where certain uses may not be open during the day or all day and the need to ensure balance between the vitality of these spaces at different times. Draft Plan policy appears suitably flexible to allow for an approach appropriate to local areas.

The supporting text to draft Policy GLE4 makes reference to the night-time economy classifications which have been assigned to each of the borough's main town centres, which the Council considers to be appropriate (further comments are provided under Policy PV3).

The Council would strongly encourage the Mayor to review existing guidance relating to borough-led night-time strategies in due course to ensure alignment with the next London Plan.

GLE5 Culture and creative industries

The Council broadly supports draft Policy GLE5, and the promotion of cultural and creative industries and specifically distinct cultural clusters including those identified in both Richmond and Twickenham town centres in the adopted Richmond Local Plan and the west London screen cluster referenced in the London Growth Plan.

GLE6 Visitor infrastructure

The Council broadly supports the overall policy approach at Policy GLE6 which promotes and supports the visitor economy and specifically serviced visitor accommodation, unless this would impact on housing supply and capacity for employment uses. The Council notes the policy resists proposals for short-term let visitor accommodation exceeding national policy permitted time limits where these have a negative impact on local provision of housing, which is welcomed.

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[30] Richmond Night Time Strategy (2025)
[31] Richmond Growth Plan (2026)

The Council notes that unlike Policy E10(C) of the London Plan 2021, draft Policy GLE6 no longer includes an explicit objective to maintain a sufficient supply and range of serviced visitor accommodation. Given the identified need for additional serviced accommodation capacity across London (approx. 66,000 net additional rooms between 2025-2050 under the central scenario in the *Visitor Accommodation in London: Post-pandemic recovery and supply-demand forecasts to 2050* (July 2026))[32], the removal of this objective appears at odds with the evidence base and could result in inconsistent approaches between boroughs when considering the loss of existing visitor accommodation, particularly at a time of competing land use pressures, including for conventional residential development. It may also undermine the ability of boroughs to support the local visitor economy where existing visitor accommodation contributes to the vitality, attractiveness and economic function of an area. The Council therefore considers that consideration should be given to retaining a strategic objective relating to the maintenance of existing serviced visitor accommodation capacity (with individual boroughs able to set out locally justified approaches to managing the loss of serviced visitor accommodation through plan-making and/or development management policies, where appropriate).

Whilst the Council acknowledges the growth of the unserviced visitor accommodation sector in recent years, this is a more dynamic market (that has impacts on residential supply) and the supporting evidence base suggests that this source of supply has contracted since 2019 (including in Richmond), reinforcing the need to maintain an appropriate stock of serviced visitor accommodation. The Council notes the content of the *Visitor Accommodation in London: Post-pandemic recovery and supply-demand forecasts to 2050* (July 2026), which forecasts a relatively limited need for additional serviced visitor accommodation in Richmond under its central scenario (59 net additional rooms between 2025 and 2050), the second-lowest forecast demand growth of all London boroughs. The relatively modest level of forecast demand growth should therefore be considered in the context of the Council's Growth Plan, which recognises the visitor economy as one of the borough's primary economic drivers and aims to increase overnight stays in the borough.

Whilst the Council supports a positive approach towards serviced visitor accommodation in appropriate locations. Given London's significant housing needs and increasingly constrained supply of development sites, it is important that Policy GLE6 provides a robust policy framework to ensure that support for visitor accommodation does not come at the expense of opportunities to deliver conventional housing on suitable sites. The Council therefore welcomes Policy GLE6(D) but considers that greater clarity is required regarding how decision-makers should assess proposals for serviced visitor accommodation on sites capable of contributing towards housing supply. The policy should make clear how the potential housing contribution of a site should be considered when considering whether serviced visitor accommodation would have an unacceptable impact on housing supply and capacity. Further clarity should also be provided regarding what is meant by the "intensification" of serviced visitor accommodation at Policy GLE6(D) and whether this is intended to relate solely to the expansion of existing provision and/or the redevelopment of additional sites.

The Council notes that, whilst existing Policy E10 supported visitor attractions, GLE6(B) provides a stronger and less qualified policy basis for promoting development associated with new and existing

[32] Visitor Accommodation in London - Post-pandemic recovery and supply-demand forecasts to 2050

visitor attractions which is unqualified. It may be helpful to clarify that proposals should continue to be assessed against other relevant planning policies and material considerations, particularly where visitor attractions may not be located in areas that are well connected by public transport.

The draft Plan does not appear to address emerging forms of visitor accommodation, such as pod or capsule hotels, which have become increasingly prevalent across London in recent years. It would be helpful for the Plan to provide a clearer policy framework for assessing such accommodation, including requirements relating to safety, accessibility and amenity for occupants.

GLE7 Affordable workspace

The Council broadly supports Policy GLE7, which is generally consistent with the affordable workspace approach established through the Richmond Local Plan and maintains flexibility for boroughs to respond to local circumstances and evidence of need.

The Council welcomes the continued application of affordable workspace requirements to both E(g) and B8 uses, as well as the inclusion of data centre development within the policy's scope. However, the Council notes that the policy does not appear to apply to B2 (general industrial) development and would welcome further clarification on the rationale for this distinction, especially as the Council considers that large scale B2/B8 development can play an important role in delivering affordable E(g)(iii) light industrial floorspace which may be more difficult to accommodate elsewhere. While it is recognised that there can sometimes be practical challenges associated with delivering affordable workspace within industrial development, the Council considers that these can be sufficiently addressed through existing planning policy and viability mechanisms on a case-by-case basis.

In order to achieve the stated policy aims, it is important that decisions over the types of use subject to affordable workspace contributions are justified. As above, the Council is concerned that the omission of B2 uses from the scope of the policy may undermine its effectiveness and that, in the absence of evidence or wider rationale, this omission has not been sufficiently justified. Furthermore, the Council considers that any theoretical concerns there may be about including B2 uses could be effectively addressed at the Local Plan stage, given that Policy GLE7 requires Local Plans to include policies on affordable workspace that are informed by evidence of need and viability, which could include requiring evidence that seeking affordable workspace from B2 uses would be justified and effective, in line with the tests of soundness.

The Council supports the flexibility afforded to Local Plans to identify the types of uses that may be delivered as affordable workspace, allowing boroughs to respond to locally identified social, cultural and economic needs. The Mayor could consider producing guidance on how affordable workspace may be delivered for a broader range of uses than those traditionally supported through affordable workspace policies. However, it will be important to establish a clear policy justification and eligibility criteria to avoid the concept becoming overly broad or difficult to define in practice.

While the Council considers that off-site provision and payments in lieu should only be considered in exceptional circumstances, where it can be robustly demonstrated that on-site provision is not appropriate or feasible, it recognises that such approaches may be appropriate in certain circumstances (e.g. where this could secure a higher level of on-site discount, a longer period of provision, and/or enable contributions to be pooled towards an affordable workspace fund or a more effective workspace hub). However, the supporting text should make clear that on-site provision

remains the preferred approach in most circumstances, with any alternative arrangements requiring robust justification and being determined locally. Off-site contributions can transfer delivery risk to the Council and may not guarantee equivalent provision within an appropriate timeframe or location.

Suggested modifications to GLE7:

- Applies to - Developments including offices, research and development and/or light industrial uses (Use Class E(g)), data centres, B2 general industry and B8 storage or distribution uses
- GLE7(A) - ...triggered by applications for new office, research and development or light industrial uses (Class E(g)), data centres, B2 general industry and/or B8 storage or distribution uses...
- GLE7(C.4) - ...the amount of affordable workspace to be provided (quantum or percentage of proposed office, research and development and/or light industrial use (Class E(g)), data centre, B2 general industry and B8 storage or distribution floorspace)
- GLE7(D) - Affordable workspace ~~can be~~ should be provided on-site in the first instance. In exceptional circumstances, it may be provided ~~or~~ in an off-site location, particularly where it is not practical or feasible to deliver on-site or where economies of scale or greater levels of discount and duration of provision could be achieved through alternative means and locations...

GLE8 Access to employment and skills

The Council broadly supports Policy GLE8, which is generally consistent with the approach to securing access to employment and skills opportunities from developments in the Richmond Local Plan. The Council notes that the wording under Part A could be interpreted as meaning the policy only sets requirements on major schemes containing employment uses (whereas the understood intention of the policy is that major schemes containing employment uses are required to provide opportunities in the completed final use, in addition to the construction phase opportunities which apply to all major developments). In order to be effective, Part A should be made clearer that requirements for construction phase opportunities are applicable to all developments, whilst requirements for final use opportunities are more relevant to employment schemes, as below.

Proposed amendment to Policy GLE8:

A. Major development proposals (or locally determined development thresholds in local plans) should support Londoners into good quality-employment, apprenticeships, and other skills development and training opportunities in the construction phase and, for schemes containing employment uses, in the completed final use ~~(for schemes containing employment uses).~~

The support in the policy for boroughs' own employment support services is welcome, especially given government proposals to devolve employment support and skills to the local level, as is the ability for Councils to set their own locally determined thresholds in Local Plan for employment and training opportunities arising from construction and end use phases of larger developments. Richmond has its own established and successful Work Match service to support local people to access jobs and training drawing on close collaboration with developers and an in depth understanding of local community needs to which contributions from developments are secured through planning obligations, including financial contributions where appropriate. The Council also has experience of working collaboratively across neighbouring boroughs in this area and the practical requirements of putting such arrangements in place.

GLE9 Aviation

The draft Plan continues to recognise the importance of aviation to London's economy and global connectivity, while maintaining a strong focus on managing the environmental impacts associated with aviation. Overall, it is noted that there is no significant change in the policy direction from Policy T8 of the London Plan 2021, however the Council welcomes the greater emphasis in draft Policy GLE9 on ensuring that aviation growth is compatible with London's wider objectives on climate change, air quality, noise reduction, and sustainable transport.

For Richmond, the principal implications of GLE9 relate to Heathrow given the potential for airport activity and future proposals to affect residents and the local environment. As set out in the Council's recent response to the consultation on the draft Heathrow Expansion National Policy Statement (HENPS)[33], the Council remain opposed to the Heathrow expansion and considers that the need for additional airport capacity has not been properly demonstrated. The Council remain concerned about the potential impacts of the expansion including in respect of aircraft noise, air quality, climate change, surface access, congestion and the health and quality of life of local communities. The Council considers existing protections for residents should be maintained and strengthened, and alternatives to expansion, including making better use of existing airport capacity and improving sustainable transport connections, should be properly considered. Given the Mayor's questioning of the case for expansion and concerns about the impacts, as set out in the recent response[34] to the Government consultation on the draft HENPS, there could be greater clarity in setting out a policy position on Heathrow. In light of the recent findings of the Climate Change Committee[35] that there is no credible pathway for Heathrow expansion to be delivered consistently with the UK's climate commitments under existing policies, the Mayor should ensure that Policy GLE9 fully reflects the need for any future aviation growth to be compatible with the achievement of Net Zero.

The Council welcomes the inclusion of emerging aviation technologies, including Advanced Air Mobility (AAM) such as drones and electric aircraft. While the immediate implications for the borough are limited, it is recognised that the development of these technologies could lead to future proposals for associated infrastructure and operations. The Council considers that potential impacts on noise, amenity, airspace and air quality, transport and the wider environment should be appropriately assessed as these technologies develop. Overall, the Council support the inclusion of AAM within the policy and the potential planning implications of AAM should continue to be kept under review.

GLE10 Safeguarded Wharves

The Council supports Policy GLE10 and recognises the important strategic role safeguarded wharves play in facilitating the movement of aggregates, construction materials, waste and other freight by river. Safeguarding wharf infrastructure helps reduce pressure on London's road network and contributes to wider environmental objectives, including improved air quality, reduced congestion and reduced

[33] Councils challenge Government's case for Heathrow expansion (28 August 2026)
[34] Mayor of London's response to the Heathrow Expansion National Policy Statement (HENPS)

[35] Climate Change Committee (2026), Advice to the UK Government on proposed Heathrow Airport expansion, 16 September 2026

transport-related emissions. The policy is therefore supported as an important component of London's sustainable growth and infrastructure network.

Whilst Richmond upon Thames does not contain any safeguarded wharves, the Council recognises the strategic importance of London's safeguarded wharf network and supports its role in facilitating sustainable freight movements and reducing reliance on road transport. The Council considers that Policy GLE10 should be more clearly aligned with wider Thames corridor objectives and initiatives, ensuring that the operation and safeguarding of wharves supports broader ambitions for biodiversity enhancement, climate resilience, environmental improvement, landscape quality and public access along the river. Whilst the policy appropriately focuses on protecting freight infrastructure, greater recognition should be given to how these objectives can be delivered alongside wider environmental and placemaking aspirations for the Thames corridor.

The Council also support the continued recognition of safeguarded wharves as an important component of London's circular economy infrastructure. Their role in facilitating sustainable waste movements, construction logistics and resource management should continue to be recognised as contributing to the delivery of London's wider environmental, infrastructure and growth objectives.

Overall, the Council supports the continued safeguarding of wharf infrastructure and the strategic role it plays in supporting London's economy and growth. However, the policy would be strengthened through greater clarity on the relationship between safeguarding and riverside regeneration, a more robust explanation of future capacity requirements, and clearer guidance on how operational wharves can coexist with neighbouring development and wider Thames corridor environmental objectives.

GLE11 Circular economy

The Council supports the strengthened focus on circular economy principles within the draft Plan, particularly the greater emphasis on building retention, adaptation, reuse and the reduction of embodied carbon associated with development. These measures have an important role in reducing resource consumption, supporting climate objectives and facilitating the transition to a more resource efficient and circular economy.

However, the Council considers that further clarification is required regarding the relationship between Policy GLE11 (Circular Economy) and Policy GHR3 (Whole Life Carbon). Whilst there is clear alignment between the objectives of the two policies, there appears to be significant overlap in the evidence that applicants may be required to provide, particularly in relation to building retention, reuse, material recovery and embodied carbon considerations. The Plan should clearly distinguish the purpose and evidence requirements of each policy to avoid duplication, provide certainty for applicants and boroughs, and ensure that broader circular economy objectives are not subsumed within a predominantly carbon-focused assessment.

The Council welcomes the stronger policy emphasis on retaining and retrofitting existing buildings where feasible. However, further guidance is needed on how these requirements should be balanced against wider regeneration, housing delivery and place-making objectives. While retention and refurbishment should be prioritised where appropriate, it will be important to ensure that the policy does not unnecessarily constrain opportunities to deliver strategic regeneration objectives where redevelopment may provide wider social, environmental or economic benefits. In particular, the Plan

should make clear that requirements will be applied proportionately, reflecting the scale, type and circumstances of development proposals.

The Council also considers that further guidance is required on implementation, monitoring and enforcement. Whilst the policy establishes a clear strategic direction, it is less clear how circular economy commitments secured through the planning process will be assessed, monitored and verified over time. Greater clarity should be provided regarding what constitutes acceptable circular economy performance and how compliance will be demonstrated post completion. The Council would support the introduction of a consistent London wide monitoring framework, including standardised reporting templates, post-completion reporting requirements and data sharing arrangements, to support effective implementation and evaluation of policy outcomes.

The policy would also benefit from greater clarity regarding how circular economy infrastructure, including reuse, repair and remanufacturing facilities, should be planned for, delivered and monitored through the planning system. Given the importance of such infrastructure to achieving circular economy outcomes, the Plan should provide a clearer strategic framework to support its delivery across London.

In addition, the Council considers that the supporting evidence should more clearly explain how future waste capacity requirements have been adjusted to reflect the anticipated impact of circular economy measures and reduced waste generation. As reuse, repair and waste prevention initiatives become more effective, waste arisings may change significantly over the Plan period, and it would be helpful to understand how these assumptions have informed projections of future waste management needs.

Finally, the Council would welcome confirmation that the cumulative impact of the Circular Economy policy has been fully considered alongside other draft Plan requirements, including Whole Life Carbon, energy, air quality and wider climate related policies. While the individual objectives of these policies are supported, applicants will ultimately be required to respond to them collectively. Understanding the combined implications of these requirements will be important in ensuring that the overall policy framework remains deliverable and proportionate, particularly for non-referable and smaller scale development proposals.

Overall, the Council supports the ambitions of Policy GLE11 but considers that greater clarity on its relationship with Whole Life Carbon policy, proportionality of application, monitoring arrangements and integration with waste planning and wider development objectives would strengthen the effectiveness and deliverability of the policy.

GLE12 Waste

The Council welcomes the consolidation of the existing waste planning policies and approach towards planning positively for sufficient waste management capacity. This is particularly important in boroughs experiencing significant competing pressures for land, where the loss of existing waste management sites could reduce the ability to manage current and future waste streams. The continued protection and safeguarding of existing waste infrastructure is therefore supported, alongside opportunities to optimise and intensify existing sites where this can be achieved in an environmentally appropriate manner.

The Council supports the continued emphasis on cross-boundary working. Richmond is currently working collaboratively with six other west London waste planning authorities on the review of the West

London Waste Plan (WLWP), which has reached the Regulation 19 consultation stage. The approach to draft Policy GLE12, which recognises the importance of cross-boundary working, is therefore consistent with existing practice.

The Council notes that the waste apportionment figures have been revised in the draft Plan and appear to represent a reduction for Richmond compared with the London Plan 2021. It is important that the methodology and supporting evidence underpinning the revised figures continue to reflect the different circumstances of London boroughs and provide confidence that sufficient waste management capacity will be planned to support future growth. The assessment should recognise the importance of robust and locally relevant evidence in understanding existing and future waste management capacity while maintaining a consistent and transparent approach across London. For Richmond the implications of the revised figures should be considered alongside the emerging WLWP and its updated evidence base as, while a legacy plan expected to be examined for its general conformity with the London Plan 2021, it is important to ensure alignment towards future needs. The Council considers the evidence base underpinning the policies should be reviewed to consider the appropriateness of the methodology and implications for its practical application pan London, and would welcome the opportunity to contribute to further discussions as part of the Examination process.

The Council notes that the supporting London Waste Infrastructure Capacity Study (2026)[36] has introduced a simplified apportionment methodology (Work Package 3) which now bases the apportionment calculations primarily on waste arisings, industrial land availability and socio-economic factors, replacing a number of previous criteria identified as having limited influence on apportionment opportunities. The Council broadly supports efforts to simplify and improve transparency in the methodology. However, the Study identifies limitations and inconsistencies in the availability and reporting of waste capacity data across London, including challenges in matching waste facilities and their operational capacity with reported throughput data (Section 6.3). The Council therefore considers that conclusions regarding capacity shortfalls should be considered alongside the most recent and locally relevant evidence. In particular, the Study identifies a capacity shortfall within the WLWP area based on evidence drawn from the adopted 2015 WLWP, which demonstrated surplus capacity through site allocations and was found sound at examination. The Council considers that this conclusion should be reviewed in light of the most recent evidence informing the emerging WLWP. The Regulation 19 version of the emerging WLWP identifies sufficient capacity, including surplus capacity, to accommodate forecast waste management requirements over the plan period. It is therefore important that the London Plan apportionment position is informed by the most up-to-date and robust evidence available and takes account of emerging local evidence.

The Council welcomes the continued recognition of Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs), including safeguarded wharves with existing or future potential for waste and secondary material management, as appropriate locations for waste infrastructure. This is particularly important given the wider pressures on industrial land in London. Waste management and circular economy infrastructure should continue to be recognised as essential components of London's industrial land network with the safeguarding of waste capacity considered alongside wider industrial land strategies and intensification objectives.

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[36] The London Waste Infrastructure Capacity Study (2026) is available from the London Plan Evidence webpage, under 'Growing London's economy in a way that benefits all'

The Council seeks clarification regarding the application of part D(1) of GLE12, which requires a site proposed for release to be demonstrably surplus to both the borough and other London boroughs in apportionment terms, having first been offered to boroughs that have not yet met their apportionment targets. Further clarification would be beneficial as to how this requirement is intended to operate in practice, including how capacity is to be identified as surplus, how it is to be formally offered to other boroughs, and what evidence should be used to establish whether other boroughs have sufficient capacity to take on these requests.

In addition, the drafting of part D(1) in relation to release could be clarified to make it explicit that it refers to the waste management capacity associated with the site, rather than the site itself. As currently drafted, the wording could imply the site is to be offered to another borough, whereas it is understood that the intention is to consider whether capacity provided by that site is required to contribute towards the apportionment needs of other boroughs. It would also be helpful to clarify how this process should operate across waste planning areas and where a site is relevant to a neighbouring borough or an established waste flow, and whether this process can happen outside of the plan-making process. Further guidance would help to ensure a consistent approach across London is applied and would provide clarity on how apportionment, existing waste flows, cross-boundary waste planning and the proximity principle should be considered together.

Given the emphasis in Policy GLE12 on cross-boundary working and the sharing of waste management capacity, the Council considers greater availability of up-to-date London wide information on waste infrastructure capacity and waste flows is essential to enable the effective implementation of the policy approach and for the GLA to monitor how strategic needs are being met. The proposed GLA waste capacity monitoring and reporting tool (Work Package 4) would provide an invaluable mechanism for maintaining a reliable and regularly updated evidence base. This would assist boroughs and sub-regional waste planning authorities in monitoring capacity, understanding waste flows, progress towards London's net self-sufficiency, and identifying opportunities to share surplus capacity, which would also support the preparation and review of sub-regional waste plans. The Council therefore support the development and ongoing maintenance of the proposed GLA waste capacity monitoring and reporting tool, including setting requirements for data reporting through the development management process, together with improved publication of waste infrastructure and waste flow data across London.

The Council welcomes the amendment to the definition of a 'waste site' (paragraph 4.100 of the draft Plan) to include sites with lawful planning use. However, concern remains that the definition continues to rely on the presence of an Environmental Agency (EA) permit as a criterion for identifying safeguarded waste sites. The EA permitting regime operates separately from the planning system, and permits may be surrendered, carried over or revoked without any corresponding change to a site's lawful planning status or its sustainability for waste management uses. As a result, the continued inclusion of EA permits within the definition creates the potential for sites to lose safeguarded status through regulatory processes that sit outside of the planning framework. This approach risks undermining the Plan's safeguarding objectives by allowing waste sites to be removed from protection on an ad hoc basis. To provide greater certainty and ensure consistency with the Plan's approach to safeguarding waste capacity, the Council recommends that safeguarding is based on lawful planning use and planning status, with reference to EA permits removed from the definition. It is therefore recommended

that paragraph 4.100 is amended to the following, which is considered consistent with the approach taken with the emerging West London Waste Plan:

> 4.100 A waste site is defined as a site that has lawful planning use for waste management activities, including sites with extant planning permission of waste management uses and sites where such uses are otherwise lawful through planning legislation. ~~either:~~
>
> - ~~a site whose primary activity is a waste-management operation that is authorised by the Environment Agency~~
> - ~~a site that has a lawful planning use as a waste site.~~

The Council notes the approach set out in paragraph 4.106 regarding the calculation of compensatory capacity where a waste site is no longer operational. While the use of a maximum throughput achieved over the five years preceding closure can provide a useful benchmark, the Council considers that this should not be the sole determinant of compensatory capacity requirements. The Council recommends that in line with National Planning Policy for Waste, that the policy and supporting text allow for the use of best available evidence to establish an appropriate throughput level for compensatory capacity. This assessment should take account of the maximum throughput achieved over the five years preceding closure, alongside other relevant factors such as the site's operational history, market conditions, capacity constraints, and the specific characteristics of the site. This approach would provide greater flexibility to reflect site-specific circumstances and local impacts, while ensuring that compensatory provision is evidence based and proportionate. It would also avoid situations where a historic peak throughput figure, which may not be representative of the site's realistic or sustainable operating capacity, becomes the sole basis for determining replacement capacity. It is therefore recommended that paragraph 4.106 is amended to the following:

> 4.106 Where required, compensatory capacity should be the same level or higher within the waste hierarchy, and at least meet (and should not exceed) the maximum achievable throughput of the site proposed to be lost. This should be provided prior to the loss of the existing waste site**.** If a site is not operational at the time that a planning application has been submitted, compensatory capacity should be based on the best available evidence, taking account of the maximum throughput achieved over the five years preceding the closure and other relevant site-specific considerations ~~should be used~~. Where a strategically important waste infrastructure is proposed to be lost, like-for-like compensatory capacity must be secured, i.e. the same waste infrastructure type/specialism, and at least the same capacity, as the waste site proposed to be lost. Where compensatory capacity is to be provided at an existing waste facility, then it should be demonstrated that this is in addition to any capacity that has been identified as meeting apportionment targets and/or waste needs for the borough in which the facility is located.

The stronger emphasis on the circular economy and moving waste up the waste hierarchy is supported. Further guidance would nevertheless be beneficial on how circular economy and reuse facilities are to be identified, planned for, and reflected in waste capacity assessments and monitoring, particularly where their operation and capacity may differ from conventional waste treatment infrastructure.

GLE13 Aggregates and mineral resources

The Council supports the overall approach to aggregates and mineral resources set out in Policy GLE13. The policy provides an appropriate strategic framework for maintaining a steady and adequate supply of construction aggregates to support London's growth up to 2050, while recognising the importance of recycled and secondary aggregates and the need to manage mineral resources sustainably.

It is noted that Policy GLE13 should be read alongside the NPPF in regard to mineral and aggregates, and this assists in avoids unnecessary duplication of national policy.

The Council note that the specific landbank apportionments in Part A(1) apply only to the four boroughs identified in the policy (including London boroughs of Havering, Redbridge, Hillingdon and Hounslow) and therefore this policy has limited application within the context of Richmond.

However, it is recognised that the borough still has the responsibilities of supporting the strategic supply of aggregates at a regional level as a Mineral Planning Authority as outlined in the supportive text in paragraph 4.111.

The Council also note the requirements in part A(2) of Policy GLE13 for plan-making authorities to examine the feasibility of using quarries for construction, demolition and excavation recycling sites once mineral extraction has ceased. While the Council support the principle of making efficient use of previously used mineral sites and increasing the capacity of recycling and secondary aggregates, this should not prejudice or lead to the premature delay of agreed restoration schemes or restoration phases. Where restoration is secured as part of a mineral working permission, any subsequent, or alterative use of the site, should be carefully considered alongside the approved restoration requirements, environmental objectives and the intended after use of the site. The policy should therefore make clear that opportunities for recycling uses should not result in the unnecessary delay of restoration or undermine the timely delivery of agreed restoration schemes. A balance will be required between maximising opportunities for the circular economy and ensuring that mineral sites are restored appropriate and within undue delay.

The Council notes that the draft policy no longer expressly refers to the Agent of Change principles in relation to aggregates and mineral facilities. The Council consider that the general Agent of Change approach remains an important consideration where new development could affect existing mineral, aggregate or associated infrastructure, and would welcome confirmation that the omission of an express reference does not indicate a change in policy approach.

The Council also notes part B of Policy GLE13 retains the existing London Plan Policy SI11 position on hydraulic fracturing, with development proposals for exploration, appraisal or production of shale gas through hydraulic fracturing to be refused. The Council support this approach taken and consider it is important that is element of policy remains responsive to any future changes in national policy legislation as indicated in paragraph 4.113 of the supportive text.

Chapter 5 - Creating a greener, healthier, and resilient city

GHR1 Energy efficiency

The Council supports the transition towards Energy Use Intensity (EUI) and Space Heating Demand (SHD) metrics within Policy GHR1 and recognises the benefits of adopting a more performance-based

approach to improving building energy efficiency. The move towards metrics which focus on energy demand and operational performance, rather than solely carbon emissions, is welcomed and has the potential to provide a clearer focus on reducing energy consumption at source. However, the Council notes that Part A of the policy seeks to limit boroughs' ability to set more ambitious energy-efficiency or emission reductions standards in local plans. Paragraph 5.19 implies that this is in cognisance of the draft NPPF which seeks to standardise energy-efficiency requirements at a national level. However, the published version of the NPPF has removed this restriction and now continues to allow local plans to set energy-efficiency requirements in certain circumstances.

The Council is concerned that by standardising EUI and SHD standards within Policy GHR1, the London Plan is essentially setting a ceiling on energy efficiency that is neither consistent with national policy (having regard to the above) or justified, when considering that many local plans have successfully justified local policies that exceed the London Plan's requirements on the basis of the obvious public benefits of higher energy efficiency and a demonstration of local viability capacity. The rationale set out in Paragraph 5.20 that standardisation is required to "avoid a multiplicity of separate standards and ratcheting up of requirements and costs" lacks an evidential basis and is inconsistent with the conclusions found by those Inspectors who have examined individual borough plans that have accepted higher standards. The paragraph goes on to again reference "aligning with the intent of the NPPF" which, as above, no longer reflects national policy.

The above is also true when considering that Policy GHR1 is only intended to apply to major development, whereas many individual borough policies, including the Council's Local Plan, have successfully introduced sound policies that apply numeric standards to a wider range of developments, including minor developments. As written, Policy GHR1 could be interpreted as placing a moratorium on this approach which for the same reasons as above is not sound and would, in practice, mean many non-major developments are built to a lower environmental standard than is currently the case.

For these reasons, the Council considers there is no justification for limiting the ability for borough Local Plans to set more ambitious EUI and SHD standards than those set out in GHR1 and that, in fact, doing so is inconsistent with national policy, and not justified, when considering the potential for local plans to put forward more ambitious policies that would be subject to their own examination of soundness.

The Council would also welcome further clarification regarding the methodology used to calculate EUI and SHD metrics, including how the baseline and aspirational targets have been established and how they are intended to be assessed, monitored and enforced over the lifetime of development. Greater certainty regarding the operation of these requirements would assist both applicants and decision makers and help ensure a consistent approach is applied across London boroughs. Clear and standardised methodologies will be essential if these metrics are to provide a robust basis for decision making and performance monitoring.

In particular, the Council considers that supporting guidance should accompany the policy setting out acceptable assessment methodologies, the relationship between SAP, Part L and PHPP calculations, and the approach that should be taken to determining compliance. Without a consistent methodology there is a risk of varied interpretation and implementation across boroughs, which could reduce confidence in the operation of the policy.

The Council notes that the policy introduces both baseline and aspirational targets, but it is not currently clear what mechanisms are intended to encourage, secure or monitor achievement of the aspirational standards. The Council would be concerned that the aspirational standards would be essentially unenforceable if they rely entirely on a willing developer. Further guidance would be beneficial regarding the role of these targets and how they are expected to influence development outcomes in practice.

The Council also notes that the proposed approach represents a shift away from the current carbon offsetting framework. Whilst there are clear benefits to focusing on operational energy performance, further explanation is required regarding how residual impacts are intended to be addressed and whether any alternative mechanism is proposed to support investment in retrofit, and decarbonisation projects. The Council notes that several London Local Plans contain EUI and SHD targets with off-setting in the form of an energy balancing approach which requires renewable energy generation on site to match or exceed the building's EUI. The Council would be concerned that the absence of a carbon off-setting mechanism (or equivalent energy balancing approach as described above) will remove any incentive for developments to achieve net zero carbon and mean that in instances where full adherence to the policy would not be feasible, boroughs will lack tools to ensure that environmental objectives would not be undermined by an approval. Furthermore, carbon offset funds have provided an important source of funding for carbon reduction measures within existing building stock and the Plan does not appear to be informed by any analysis of the implications of their loss. For these reasons, the Council considers that the absence of a carbon-offsetting mechanism (or energy balancing equivalent) means the policy as a whole is not sound on the basis that it is not justified.

The Council would also welcome further guidance regarding how the policy applies to different development types, including major refurbishments, extensions and mixed-use schemes, together with clarification of the relationship between operational energy performance, retrofit-first approaches and whole life carbon objectives. The Council also considers that post-completion monitoring and verification arrangements will be important to ensure that predicted energy performance is achieved in practice. Consistent reporting requirements and monitoring procedures would provide greater confidence in the effectiveness of the policy and support the development of an improved evidence base over time.

The Council further considers that the policy should provide sufficient flexibility to recognise site-specific constraints and differing development typologies, whilst maintaining ambition and consistency across London. Further clarification would be helpful regarding how decision makers should weigh proposals that do not fully achieve the target metrics but have demonstrably optimised energy performance and balanced wider planning objectives.

The Council further considers that energy efficiency requirements should remain proportionate and capable of being implemented effectively through the development management process. Given the range of climate-related policies within the draft Plan, it will be important to ensure that cumulative evidence requirements are justified, clearly defined and do not result in unnecessary duplication.

For the reasons above, the Council considers the following modification is necessary to make Policy GHR1 sound. The Council has also made a number of comments regarding clarifications or additional guidance which would not be addressed by this modification:

- This policy sets the energy-efficiency requirements for development in London; plan-making authorities ~~should not~~ may set their own energy-efficiency or emissions reduction standards (specified in terms of EUI and SHD) in local plans where justified by evidence.

GHR2 Low-cost low-carbon heat

The Council supports the objective of delivering low-cost and low-carbon heating solutions and welcomes the recognition that both carbon reduction and affordability should be considered in the design and operation of energy infrastructure. Ensuring that lower-carbon heating technologies remain affordable for occupiers will be essential in supporting a fair and successful transition towards net zero development.

The Council would, however, welcome further clarification regarding the application of Policy GHR2 and the evidence expected from applicants in demonstrating that appropriate heating options have been considered. Greater clarity regarding assessment methodologies, decision making criteria and the level of supporting information required would assist boroughs in applying the policy consistently and provide certainty to applicants.

The Council also notes the continued uncertainty surrounding national policy, regulation and investment relating to heat networks and low-carbon energy infrastructure. The policy and supporting guidance should therefore remain sufficiently flexible to respond to future technological developments and changes in national policy and legislation over the lifetime of the Plan.

The Council welcomes the intention to consider affordability alongside carbon reduction objectives but would benefit from further clarification as to how affordability outcomes are intended to be assessed and balanced against wider environmental objectives. This would assist decision makers in applying a transparent and consistent approach when considering development proposals.

GHR3 Whole life-cycle carbon

The Council supports the overall direction of Policy GHR3 and welcomes the strengthened approach to reducing embodied carbon emissions associated with development. The policy recognises that, as operational emissions continue to reduce through the decarbonisation of the energy grid, embodied carbon represents an increasingly significant proportion of emissions associated with the built environment. The introduction of specific requirements relating to upfront embodied carbon and whole life-cycle carbon assessment reflects the growing importance of addressing emissions throughout the entire life cycle of development.

The Council strongly supports the requirement established in Part A that requires the retention, adaptation and reuse of existing buildings and structures should be considered before demolition is proposed. Reuse and retrofit can deliver significant carbon savings and align with broader circular economy objectives. The requirement for pre-redevelopment audits provides a useful mechanism for ensuring that embodied carbon is minimised at an early stage of the design process. However, the Council considers that further guidance is required regarding how these requirements will be balanced against other objectives, including housing delivery, regeneration, and growth. It is important that the policy supports a proportionate approach which recognises site specific constraints, redevelopment opportunities and the need to optimise site capacity where appropriate.

The Council welcomes the introduction of baseline and aspirational upfront embodied carbon targets for referable schemes. These requirements go beyond the current policy requirements and have the

potential to contribute to reductions in construction related emissions through design, material efficiency and lower carbon construction processes. The policy will help ensure that carbon reductions are considered during the design of buildings from the outset rather than being addressed only through operational carbon savings. The introduction of embodied carbon emissions targets will go beyond existing requirements to ensure that buildings are of good design and material efficiency from the outset.

However, the Council would welcome further clarification around the methodology used to calculate embodied carbon emissions, including how the baseline and aspirational targets have been calculated and how compliance will be assessed. Additional guidance would also be beneficial regarding circumstances where site constraints or operational requirements may affect the ability to achieve the targets. The Council also notes that the policy introduces both baseline and aspirational targets, but it is currently unclear how developers could be encouraged to meet the aspirational targets. Further guidance is needed regarding the weight that should be afforded to aspirational targets in decision-making and the circumstances in which missed targets may be justified.

The Council believes there is potential to extend embodied carbon targets to all schemes. Whilst the proposed focus on referable applications is understandable given the potential complexity of assessment requirements, smaller developments collectively contribute significantly to construction related emissions. Minor applications make up a large proportion of applications in Richmond, therefore limiting the policy to only referable applications would result in a large amount of potential carbon savings being missed. The Council's view is that the policy should therefore support the option for boroughs to set a lower threshold, where justified on the basis of local evidence.

The Council supports the retention of whole life-cycle carbon assessment requirements and the continued use of the GLA Whole Life Carbon Assessment Tool.

The Council notes the close relationship between Policy GHR3 and Policy GLE11 Circular Economy. Boroughs and applicants would benefit from clearer guidance explaining how the two policies are intended to operate collectively and requirements for pre-redevelopment and pre-demolition audits to inform design which minimises waste (GLE11) or minimises embodied carbon emissions (GHR3). Furthermore, paragraph 5.30 could emphasise the importance of building retention with regard to maintaining character in addition to carbon savings.

GHR4 Heat risk

The Council supports the overall direction of Policy GHR4 and welcomes the strengthened emphasis on climate adaptation, heat resilience and overheating mitigation. The Council recognises that rising temperatures, more frequent heatwave events and the Urban Heat Island effect represent significant and growing challenges for London. The policy responds positively to these challenges by ensuring that heat risk is addressed through the design and master planning process and by requiring development to be designed for future warming scenarios not just current conditions.

The Council supports the policy's shift towards a more design-led approach to managing heat risk. The replacement of the cooling hierarchy with a greater focus on passive design measures reflects the importance of mitigating overheating at the earliest stages of development. The Council agrees that the design process provides the greatest opportunity to reduce both current and future overheating risks.

The Council strongly supports Part A of the policy, which places greater emphasis on addressing the Urban Heat Island effect through master planning, public realm design and urban cooling measures. Prioritising green and blue infrastructure, high albedo materials, considering building form and minimising waste heat has the potential to deliver wider environmental and public health benefits whilst improving climate resilience across London. This is particularly important in areas of growth and intensification where increasing density can worsen overheating if not carefully considered.

The requirement to consider future climate change scenarios rather than basing design on current climate conditions is welcomed and reflects best practice in climate adaptation planning. The Council agrees that reducing solar glare, improving natural ventilation and minimising excess heat should be considered in overheating mitigation strategies. The Council also supports the requirement in Part B for applicants to demonstrate how passive design opportunities have been maximised before active cooling is considered. Active cooling systems should be used as a last resort once all feasible passive measures have been incorporated into the design of a development to ensure that carbon emissions and potential waste heat are mitigated.

The Council welcomes the continued use of industry standard methodologies with Part O of Building Regulations[37], including CIBSE TM52 and TM59 guidance, that support the requirement for overheating modelling to demonstrate how overheating risks have been assessed and mitigated.

However, the Council is concerned that the requirements of Policy GHR4 only apply to major developments, despite the obvious and compelling need to ensure all types and scales of development are resilient to heat risk and mitigate overheating impacts. Consequently, the Council considers that there is merit in applying proportionate overheating and passive cooling requirements to minor development in addition to majors. Whilst the policy's focus on major development is understood, smaller schemes collectively account for a significant proportion of residential development across Richmond and therefore a significant number of residents within this type of development are also be vulnerable to overheating risks. The Richmond Local Plan requires both major and minor development to meet Part O of the Building Regulations overheating mitigation requirements. For these reasons, the Council believes Policy GHR4 should be extended to minor residential developments to ensure all residents are not at risk of overheating.

GHR5 Flood risk and drainage

The Council supports the overall direction of the policy and welcomes the increased emphasis on climate adaptation, flood resilience and the use of Sustainable Drainage Systems (SuDS). The focus on coordinated drainage solutions and the need to plan for more frequent and intense rainfall events resulting from climate change is particularly welcomed.

However, the Council notes that GHR5 only relates to surface-water flood risk and does not address flood risk from all sources. Given the significant risk presented by flooding from other sources, including tidal and fluvial sources, the omission of a relevant policy that relates to these sources may adversely affect the effectiveness of GHR5 and the draft Plan as a whole. Whilst the Council recognises that a view may have been taken that policy on flood risk from other sources has been adequately addressed at a national level, and does not require duplication in the draft Plan, the Council's view is there are specific considerations that apply to London, having regard to its unique density and

[37] Statutory guidance: Overheating: Approved Document (MHCLG)

relationship with flood risk, that mean that specific direction on flooding from a wider range of sources is required, for both plan-making and decision-making.

The Council considers that the policy could be strengthened by providing greater recognition of existing drainage and sewer capacity constraints, particularly within established urban areas, and by ensuring that development is aligned with the timely provision of supporting infrastructure. The Council supports the continued application of the well-established drainage hierarchy as a key mechanism for managing surface water runoff at source, reducing pressure on sewer networks and promoting sustainable drainage outcomes. The Council would also welcome clarification of the relationship between on-site drainage measures and the use of off-site contributions under Part B.2.ii, including confirmation that opportunities to deliver SuDS and runoff reduction measures on-site should be maximised where technically feasible before reliance is placed on off site measures. Greater clarity would also be welcomed regarding the long-term management and maintenance of SuDS to ensure they continue to operate effectively throughout the lifetime of development. The Council would also welcome greater clarity regarding runoff reduction targets and the application of greenfield runoff rate requirements, particularly in relation to minor development proposals where the practical application of these requirements can be less clear.

In addition, the policy should be updated to reflect the National SuDS Standards, including requirements relating to the capture of the first 5mm of rainfall runoff. Any references to the London Sustainable Drainage Proforma should also be reviewed to ensure alignment with the emerging national framework, associated guidance and future submission requirements.

The Council supports a stronger emphasis on multifunctional green and blue infrastructure and considers that the policy should more explicitly recognise the multiple benefits of nature-based solutions in delivering flood attenuation, urban cooling, biodiversity enhancement and wider public realm improvements. There is also an opportunity to strengthen links between GHR5 and GHR4 (Heat Risk), recognising the important role that green infrastructure plays in addressing both overheating and flood risk.

The policy should also recognise the need for development requirements to be reflected in the investment plans and delivery programmes of water and wastewater providers, consistent with their statutory responsibilities, to help ensure that growth is supported by the timely provision of infrastructure.

In Richmond, greater emphasis should be placed on the role of river corridors, natural flood management measures and multifunctional green blue infrastructure in enhancing flood resilience, biodiversity and climate adaptation. The Council would support stronger recognition of catchment based and nature based approaches where appropriate, including links with GHR9 in terms of a riverside strategy approach.

Overall, the Council supports the intent of the policy and considers that further integration with policies relating to heat resilience, biodiversity and urban greening would help deliver a more holistic and effective approach to climate adaptation across London.

GHR6 Trees, biodiversity and geodiversity

The Council supports the consolidation of existing London Plan Policies G6 (Biodiversity and Access to Nature), G7 (Trees and Woodlands) and G9 (Geodiversity) into Policy GHR6. The policy provides a

comprehensive framework for protecting and enhancing biodiversity, trees, geodiversity and access to nature, whilst strengthening the links between nature recovery, climate resilience and green infrastructure planning. The Council particularly welcomes the stronger integration of London's Local Nature Recovery Strategy (LNRS) into both plan-making and development management processes.

The Council supports the strengthened approach within Part A(6), which extends beyond the adopted Plan policies by requiring Local Plans to not only protect priority habitats and species outside the SINCs, but also to support their creation, improvements and connection to priority species and habitats. This clause also encourages Local Plans to promote opportunities for enhancing priority species and habitats that sit outside the SINC network using Local Nature Recovery Actions Plans (LNRAP).

The Council welcomes the stronger role of the LNRS and Local Nature Recovery Action Plans in informing future habitat creation, enhancement and planning decisions. However, the Council notes that many boroughs, including Richmond, have previously delivered biodiversity objectives through Biodiversity Action Plans (BAPs). Whilst Policy GHR6 continues to recognise BAPs within Part F, it is unclear why Part A(6) refers solely to Local Nature Recovery Action Plans. The Council recommends that equivalent reference to Biodiversity Action Plans is retained within the plan-making section to provide flexibility for boroughs that continue to produce BAPs.

Additionally, consistent with concerns raised by Greenspace Information for Greater London (GiGL)[38], the Council considers that strategic resources such as the LNRS and LGIF should complement rather than replace the use of up-to-date local ecological evidence in plan-making and development management. Given the dynamic nature of biodiversity data, planning decisions should continue to be informed by the most current ecological information available. The Council also supports measures to improve the collection, management and sharing of ecological survey, habitat and monitoring information generated through the planning process, helping to ensure that planning decisions and nature recovery initiatives are informed by a robust and up-to-date evidence base. Biodiversity policy should also recognise the importance of priority habitats and species both within and outside designated sites, reflecting the contribution that wider habitat networks make to nature recovery.

The Council is concerned that the draft policy has not carried forward the provision within adopted London Plan Policy G6 that encouraged the creation of "other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context". The loss of this clause may make it more difficult for Local Planning Authorities to secure species-specific biodiversity enhancements through development.

While the LNRS provides an important strategic framework for habitat creation and nature recovery, it may not always provide clear policy basis for securing species-specific biodiversity enhancements associated with the built environment. Features such as swift bricks, integrated bat roosting features, and other wildlife features often represent some of the most effective biodiversity enhancements that can be secured on highly constrained urban sites where opportunities for larger habitat creation schemes are limited. These interventions have become increasingly important in supporting urban species that are experiencing significant population declines. Therefore, the Council recommends that GHR6 retains explicit reference to artificial nest sites and other urban biodiversity features. This would

[38] GiGL - Helping Shape a Better London Plan for Nature (September 2026)

help ensure biodiversity enhancement is not interpreted solely as habitat creation and would provide stronger policy support for securing species-specific measures through the development management process.

The Council supports the inclusion in D(1) of additional protections for Sites of Importance for Nature Conservation (SINCs), particularly the requirement that developments within, adjacent to or near SINCs must adequately assess for direct and indirect effects on biodiversity. The recognition that impacts can occur beyond site boundaries is welcomed and reflects the reality of development pressures affecting London's biodiversity.

However, further guidance is required regarding what constitutes "indirect impacts" and how such impacts should be assessed. In the Council's experience, impacts such as increased recreational pressure, habitat fragmentation, disturbance from lighting, noise pollution, changes to ecological connectivity and nutrient impacts can often be underestimated or inconsistently assessed through the planning process. Clearer guidance would assist applicants and decision-makers and help ensure a more consistent and robust approach across London. The Council feels very strongly that indirect impacts should be defined so that developers and LPAs can be held to account over the full scale of impacts of their proposals.

Part F sets out that BAPs can provide useful information for habitat creation proposals as well as consider future climate scenarios to ensure that habitat proposals are designated to be resilient to change in climate. This addition is well received by the Council and should be retained in the future drafts of the London Plan.

The Council welcomes the policy objective to improve access to nature and address areas of deficiency in access to nature. However, the Council considers that paragraph 5.76 of the supporting text should be amended to better reflect the need to balance public access with the protection of sensitive habitats and species. Whilst improving access to nature is an important objective, increased visitor numbers can in some cases lead to habitat degradation, trampling, erosion, disturbance to wildlife and a reduction in ecological quality. This is particularly relevant in London where many SINCs and Local Nature Reserves already experience significant recreational pressure. The Council therefore considers that access improvements should only be promoted where it can be clearly demonstrated that they will not adversely affect the ecological function or conservation value of a site.

The supporting text should also place greater emphasis on the provision of new greenspace and habitat creation as part of development proposals before seeking to increase access to existing sensitive wildlife sites. New development should first prioritise new on-site green infrastructure and habitats, then enhancement of existing lower-value greenspaces, and only then, where appropriate, sensitively increase access to protected sites. This would provide a more balanced approach and help avoid additional pressures on London's most valuable wildlife sites.

The Council strongly supports the strengthened policy detail relating to tree planting and urban forest management. In particular, the requirement to prioritise larger-canopied species where site constraints allow, provide adequate soil volume and rooting space, and select climate-resilient species is welcomed. These requirements will help maximise the long-term environmental, climate adaptation and urban cooling benefits delivered by tree planting.

The Council also supports the additional clarity provided within Part C regarding developments that impacts existing trees and include detailed guidance for proposals which impact trees of value and where works are near retained trees or on a constrained site. However, Part C of the policy should set stronger requirements to protect veteran and mature trees during development, where replacement planting will take years to replicate the amenity and ecological value of such trees.

Suggested modification:

> C. Development proposals should ensure that, wherever possible, existing trees of value85 are retained (including individual trees and groups of trees) and harm avoided, with consideration given to alternative layouts or construction methods86. In particular:
>
> (1) resist the loss of mature or veteran trees unless the tree is dead, dying or dangerous or felling is unavoidable for reasons of good arboricultural practice
>
> (~~1~~2) if the removal of trees of value is demonstrated as unavoidable, there should be adequate replacement[87] based on the existing benefits of the trees that are to be removed, determined by an appropriate valuation system[88]

The Council supports the continued protection of geodiversity assets and notes that there are no substantive changes to the geodiversity elements of the policy. The retention of protections for geological assets remains important and is supported.

GHR7 Green infrastructure and Urban Greening Factor

The Council welcomes the consolidation of existing London Plan Policies G1 Green Infrastructure and G5 Urban Greening into a single policy, GHR7 Green Infrastructure and Urban Greening Factor, which considers the relationship between green infrastructure networks and site-specific urban greening. The Council also supports the continued requirement for boroughs to identify opportunities for strategic green infrastructure interventions through local plans and area strategies, in line with the evidence of the LGIF and London's LNRS.

In relation to plan-making, the Council considers that the policy could be made more effective by integrating specific elements relating to flood risk and climate change. A modification is proposed below.

> A. Plan-making authorities, in local plans and area-based strategies should:
>
> (1) use up-to-date local evidence to identify key green infrastructure assets, their function and their potential function to support multiple benefits, including flood resilience,
>
> (2) identify opportunities for strategic green infrastructure interventions to address environmental (including climate change) and social challenges, in line with the evidence of the LGIF and London's LNRS.

However, the Council is concerned that the draft policy removes the requirement from the London Plan 2021 which requires major development proposals to contribute to the greening of London by incorporating urban greening as a fundamental element of site and building design. This requirement has been an important policy mechanism in ensuring that greening is considered from the earliest stages of site planning and design rather than being incorporated retrospectively after significant design choices have been made. Early consideration of urban greening enables development proposals to

identify the most appropriate greening interventions for a site to maximise benefits and secure long-term integration with wider placemaking, biodiversity, drainage, cooling and public realm objectives.

Whilst UGF targets remain an important tool to secure greening, it should not replace the broader design principle that greening should be embedded within site and building design from the outset. The Council therefore recommends reinstating the wording from the adopted Plan Policy G5 A and the supporting text which requires major development proposals to contribute to the greening of London through including urban greening as a fundamental element of site and building design.

The Council objects to the omission of a dedicated policy approach to food growing from the draft Plan and considers this a significant weakening of the Plan. The removal of the policy details equivalent to London Plan 2021 Policy G8 risks reducing strategic support for allotments, community food growing and related initiatives at a time of increasing concern regarding food security, access to local healthy food, biodiversity, climate resilience and community wellbeing.

The Council notes that the draft Plan contains only a brief reference to food growing within Policy HN8 (Housing Design), as a potentially appropriate element of communal outdoor amenity space in new housing development. While welcomed, this is not considered a substitute for a dedicated strategic policy approach recognising the wider benefits of food growing spaces and requiring their protection and supporting enhancement across London.

While the Council's adopted Local Plan (2025) provides strong protections for allotments and food growing spaces through Policy 52, London-wide policy support remains important. The Council therefore requests that a dedicated allotments and food growing policy approach, equivalent to former London Plan Policy G8, is reinstated within the final Plan. This could be as part of a strategic policy approach to multi-functional green infrastructure or through a cross-cutting theme towards promoting healthy lifestyles and reducing health inequalities.

GHR8 Accessible green space

Draft Plan Policy GHR8 marks a departure in terminology with 'Public Open Space', being replaced by Accessible Green Space (AGS). It is considered that the existing Public Open Space terminology was suitable and should be returned to as part of future drafts of the London Plan. The NPPF (2026) HC1 now recognises for plan-making local standards can be set with reference to national standards and best practice, which includes reference to the standards set by Natural England but also standards for open space, outdoor sport and play recommended by Fields in Trust. While the draft Plan should set out the strategic pan-London approach to green space, there should be flexibility for Local Plans to tailor the evidence to local circumstances and evidence.

This policy aims to improve access to greenspace, taking account of areas of deficiency (AOD) and local green infrastructure priorities which is a departure from the adopted London Plan which focuses more on protecting existing open spaces. In particular, the guidance both for plan making and development plans regarding the provision of new accessible green space is supported in principle and this proactive approach is welcomed.

A(3) of the draft policy sets out that Local Planning Authorities should establish payment rates for off-site AGS contributions. This policy should be amended to clarify that AGS should be provided on site wherever possible and especially in AOD. Only where it can be demonstrated that on-site provision is not feasible should off-site AGS contributions be considered. A higher threshold of evidence should

also be established for providing off-site AGS contributions in AOD. Paragraph 6.308 of the draft Plan's Integrated Impact Assessment (IIA) supports this sequential approach to AGS as a reasonable alternative to the draft policy. Where the IIA suggests that this alternative approach would result in a reduction of IIA objectives 5: Health and community safety, 6: Equality of opportunity, 7: Climate change and 8: Biodiversity geodiversity, the Council disagrees. This analysis isn't supported by a clear argument and it is the Council's view that greater provision of AGS on-site would only result in greater benefits to the IIA objectives as it would increase the total amount of AGS in the borough and reduce the AOD.

GHR9 Clean and healthy waterways

The Council supports the objective of improving the health, quality and resilience of London's waterways and recognises the important contribution that rivers, streams and other water environments make towards biodiversity, climate resilience, recreation, public health and the quality of London's blue and green infrastructure network. The continued inclusion of a strategic policy focused on clean and healthy waterways is therefore welcomed.

In particular, the Council strongly welcomes the references in Policy GHR9 to the role of Joint Thames Strategies, including the requirement for local plans to make provision for "relevant elements of Joint Thames Strategies" and the requirement for relevant developments to "conserve and enhance the distinct open character and heritage of waterways and their settings, including through reflecting any relevant Joint Thames Strategy." The Council notes the important role of existing river corridor strategies and partnership led initiatives in delivering environmental improvements. The Council also supports a stronger emphasis on river restoration, natural flood management and catchment-based approaches to improving water quality and ecological resilience. The objectives of Policy GHR9 appear to align closely with the Thames Landscape Strategy and wider cross boundary initiatives operating across West London, which the Council supports. However, the Council would recommend that the supporting text be updated to more explicitly recognise the contribution these established partnerships can make, with particular reference to their importance as a co-ordination and delivery tool where opportunities exist to improve biodiversity, climate resilience, water quality and public access in relation to the Thames.

> Supporting Paragraph 5.100: In order to ensure that an integrated approach is adopted along the River Thames and to reflect its strategic importance it is recommended that the text is amended as follows:
>
> The River Thames is a strategically important and iconic feature of London. It is a focal point for London's identity reflecting its heritage, natural and landscape values as well as cultural opportunities. Its character changes on its way through London.
>
> Setting boundaries for the Thames Policy area should be done in consultation with neighbouring boroughs, including those across the river. When defining boundaries, consideration should be given to the following criteria:
>
> - proximity to the Thames
> - clear visual links between areas, buildings and river
> - specific geographical features such as main roads, railway lines and hedges
> - the whole curtilage of properties or sites adjacent to the Thames
> - areas and buildings whose functions relate or link to the Thames

- areas and buildings that have an historic, archaeological or cultural association with the Thames.

Where Thames Policy Areas (TPAs) are not defined in Development Plans, the boundaries defined in Figure X.X apply.

The adopted London Plan 2021 Figure 9.7 could be carried forward to reflect the proposed inclusion of the additional text proposed above in relation to the TPAs but with the different stretches of the River named to reflect the individual Joint Thames Strategies being:

- *Thames Landscape Strategy (Weybridge to Kew)*
- *Thames Strategy Kew to Chelsea*
- *Thames Strategy London Central*
- *Thames Strategy East*

The Council supports the principle that development should contribute positively towards the protection and enhancement of London's waterways and water environment. Measures that reduce pollution, improve water quality and enhance the ecological function of river corridors will assist in delivering wider environmental, biodiversity and climate adaptation objectives. However, further clarification would be beneficial regarding how development proposals are expected to demonstrate compliance with the policy and contribute towards measurable improvements in water quality and ecological health.

The Council considers that stronger links should be established between Policy GHR9 and related policies concerning Sustainable Drainage Systems (SuDS), flood risk management, biodiversity enhancement, urban greening and climate adaptation. An integrated approach to water management would assist applicants and boroughs in delivering multiple environmental benefits through development proposals whilst supporting a more coordinated approach to improving the quality and resilience of London's waterways.

The Council welcomes the increased emphasis on nature based solutions and considers that greater recognition should be given to river restoration, natural flood management measures, wetland creation and wider river corridor enhancement. Such measures can deliver multiple benefits, including improvements to water quality, biodiversity, flood resilience, urban cooling and public amenity.

Given that waterways and catchments extend beyond administrative boundaries, the Council supports the promotion of collaborative and catchment based approaches to planning and environmental management. The Council would welcome greater clarity regarding the relationship between development, wastewater infrastructure capacity and water quality objectives, particularly in areas experiencing significant growth and development pressures.

The Council also considers that the policy should better recognise the multiple and sometimes competing functions of London's waterways. River corridors provide important environmental, recreational, navigation, freight, cultural and placemaking benefits. It will therefore be important that water quality and ecological enhancements are delivered alongside objectives relating to public access, recreation, navigation and the wider enjoyment of the river environment.

The Council notes the close relationship between Policy GHR9 and Policy GLE10 (Safeguarded Wharves). Whilst the strategic role of river freight infrastructure is recognised and supported, implementation of both policies should seek to ensure that operational requirements, water quality improvements, biodiversity enhancement and public access are considered in a balanced and coordinated manner.

The Council would also welcome clearer monitoring and reporting arrangements to demonstrate how improvements in water quality and ecological health will be measured over time and how the effectiveness of the policy will be evaluated.

GHR10 Air quality

The Council supports the continued prioritisation of air quality improvements within the draft Plan and welcomes the recognition of air pollution as a significant public health issue. The Council recognises the substantial progress made by London boroughs and the Greater London Authority in reducing emissions and improving air quality over recent years and supports the continued inclusion of a strategic policy framework aimed at protecting public health and improving environmental quality.

Whilst the Council supports the overall direction of the policy, it considers that further clarity should be provided regarding the long term air quality outcomes that the Plan is seeking to achieve. In particular, the Council would welcome a clearer commitment to supporting the achievement of World Health Organization (WHO) Air Quality Guideline levels, together with a defined trajectory towards these outcomes. The Council considers that measurable targets and implementation mechanisms would assist in demonstrating how planning decisions contribute towards London's long term air quality ambitions.

The Council also considers that greater emphasis should be placed on reducing emissions and exposure to fine particulate matter (PM2.5). Whilst significant progress has been made in reducing nitrogen dioxide concentrations across London, PM2.5 continues to present a significant public health challenge. The Council would welcome greater clarity regarding how development proposals are expected to contribute towards reductions in PM2.5 emissions and exposure, together with appropriate monitoring and reporting arrangements.

The Council supports the principle that development should contribute positively towards improving air quality. However, further consideration should be given to the relationship between Air Quality Positive and Air Quality Neutral approaches. The Council would welcome clarification regarding how these concepts are intended to operate in practice and whether the continued use of Air Quality Neutral standards is consistent with the objective of achieving continual improvements in air quality and progress towards WHO guideline levels. The draft Plan should remove reference to Air Quality Neutral, this assumes that London is content with UK Objectives, development needs to be air quality positive in order to deliver against the WHO interim objective levels. The plan should consider the combined effect of multiple developments on local emissions and exposure. In addition, support boroughs in identifying locations where environmental capacity may constrain further growth.

The Council supports measures that reduce exposure to poor air quality in locations affected by strategic transport corridors and town centre activity, whilst protecting the borough's parks, open spaces, schools and residential communities. The Council considers that reducing exposure for vulnerable populations should remain a key objective of the policy. The Council would welcome further

guidance regarding how environmental capacity considerations should be considered when planning for growth and intensification in areas experiencing existing air quality constraints.

The Council would welcome consideration of emissions arising from temporary events and associated energy generation infrastructure, recognising that these activities can make a significant contribution to local air quality impacts in certain circumstances.

The Council also supports stronger measures to reduce emissions arising from construction, demolition and operational activities. Appropriate controls on construction emissions, dust and non-road mobile machinery continue to play an important role in minimising local air quality impacts and protecting nearby communities. The Council would welcome continued review of these requirements to ensure that they reflect evolving technologies and best practice.

The Council considers that greater emphasis should be placed on reducing human exposure to air pollution alongside reducing emissions. This includes careful consideration of the location of sensitive uses, measures to reduce pollutant exposure within public spaces and buildings, and improvements to indoor air quality. Such measures will be particularly important in locations where pollutant concentrations remain elevated despite wider emission reduction initiatives.

The Council would also welcome stronger recognition of emissions associated with freight, servicing and logistics activities. Greater attention should be given to emissions arising from last mile delivery services, urban freight consolidation and servicing and operational transport associated with development. Further support for freight consolidation, zero emission deliveries, micro-logistics and freight management measures would assist in addressing a significant and growing source of urban emissions whilst supporting wider sustainable transport objectives.

The Council considers that robust monitoring and accountability arrangements will be essential to the successful implementation of Policy GHR10. Further clarification would be beneficial regarding London wide performance indicators, monitoring requirements, reporting mechanisms and processes for reviewing policy performance against identified air quality targets, including progress towards WHO guideline levels and reductions in PM2.5 exposure. Consistent monitoring arrangements would also assist boroughs in assessing the effectiveness of planning interventions and informing future policy development.

Finally, the Council would welcome greater clarity regarding the role of planning obligations in securing air quality mitigation and improvement measures. The Council considers that Section 106 agreements can play an important role in delivering site-specific mitigation, supporting local air quality improvement initiatives and funding measures which reduce emissions and exposure. Further guidance regarding the use of planning obligations would assist in ensuring a more consistent approach across London boroughs and strengthen the ability of the planning system to contribute towards measurable air quality improvements.

GHR11 Cycle and car parking

The Council supports the overall direction of draft Policy GHR11 and its continued emphasis on facilitating active travel, reducing reliance on private cars, and ensuring appropriate cycle parking is incorporated into new development. The Council supports the use of minimum cycle parking and maximum car parking standards, together with the emphasis on integrating parking provision into the design of the development from the outset.

The Council notes that the proposed minimum cycle parking standards align with the standards introduced earlier this year through the Support for Housebuilding LPG and essentially make these changes permanent. As set out in the Council's response to the Mayor's consultation on the LPG, the Council welcomes the fact it has been placed in Band 1, where the highest standards apply. Whilst a modest reduction relative to the existing London Plan, the Council accepts that, since the preparation of the 2021 Plan, other models of bicycle use, including docked and dockless bikes for hire, have become more popular, and the amount of cycle parking delivered on some developments has been observed to be excessive. Consequently, the Council supports the proposed cycle-parking requirements in principle and the emphasis on providing secure, accessible and high-quality cycle storage. Cycling is already an important mode of travel in Richmond, with the borough recording the highest level of cycling participation of any Outer London borough, and the Council is actively promoting further growth in cycling through investment in cycling infrastructure, improved connectivity and secure cycle parking. The proposed standards are therefore supported as a means of meeting existing demand and facilitating future growth in cycling. Cycle parking should be designed to accommodate a range of cycle types and the needs of different users and should be appropriately integrated with other essential development requirements, including servicing, refuse storage, access, landscaping and amenity. On constrained sites, the application of the standards should allow for appropriate consideration of site-specific circumstances to ensure that high-quality cycle parking can be delivered without compromising other essential elements of development.

The Council notes that the Support for Housebuilding LPG includes a provision, at Paragraph 2.2.2, which acknowledges that where boroughs have compelling evidence that higher standards are required to meet local demands, they may require higher levels of provision than that set out in the LPG (and carried forward into the London Plan). The Council also notes that in drafted Policy MBUL5 part B.3 states that Local Plans should not set cycle parking standards below those set out in Policy GHR11. The Council considers that this wording implicitly acknowledges that local planning authorities may set higher standards where justified by local evidence. However, this flexibility is not explicitly recognised within Policy GHR11 itself, or its supporting text. Given demand for cycle parking will vary considerably in different areas and in relation to different schemes, the Council considers that applying standards rigidly without any prospect of local variation may undermine the effectiveness of the policy. In order to be effective, the Council would recommend the following modification to the policy:

C. Residential development should provide at least the number of long-stay cycle parking spaces set out in Table 5.3 or the number of spaces required by a local plan, where justified. Non-residential development should provide long-stay cycle parking spaces for at least the percentage of staff set out in Table 5.4 and the number of students or pupils in Table 5.5.

If the Mayor wishes to ensure that local plans only set alternative standards on the basis of compelling evidence, this could be specified in the supporting text, using similar wording to that used in the LPG.

The Council supports the objective of reducing car dependency and the use of car-free and car-lite development where there are realistic opportunities for residents and occupiers of the development to travel by sustainable modes. The Council also welcomes the introduction of the Sustainable Access Measure (SAM) as a means of informing maximum car parking provision. SAM has the potential to provide a more nuanced understanding of accessibility and car dependency by better reflecting access to employment, services and everyday destinations through sustainable modes, rather than focusing primarily on proximity to public transport services. However, given Richmond's predominately suburban

character and significant variation in accessibility across the borough, particular care is required when applying the maximum car parking standards. While many parts of the borough benefit from good public transport connections and are well suited to car-free or car-lite development, there are also locations where sustainable transport options are more limited and realistic alternatives to car use are less readily available. The Council therefore considers that, alongside the Sustainable Access Measure (SAM), the application of maximum parking standards should continue to have regard to robust local evidence and site-specific circumstances, including existing and planned sustainable transport provision, travel behaviour and local parking pressures.

The Council also notes that the locational basis for residential parking standards in the draft Plan relies more heavily on the London Context Map and its associated context settings than the adopted London Plan, which currently uses broader 'Inner' and 'Outer' London classifications alongside other criteria. As set out in the Council's response to Policy MBUL2, there are concerns that aspects of the London Context Map and its underlying datasets do not always accurately reflect local character or development patterns. Given that these classifications are proposed to inform maximum residential car parking spaces per dwelling (Table 5.8 in the draft Plan), the Council considers that further review and refinement of the methodology and mapping would help ensure they provide a robust basis for the application of residential parking standards.

The Council also raises concerns that reductions in on-site parking provision could increase pressures on surrounding streets where sustainable transport alternatives or parking controls are more limited. The potential for overspill parking should therefore be appropriately assessed, particularly in areas experiencing significant growth or re-development, with suitable sustainable transport and parking management measures where necessary.

Overall, Richmond supports the ambitious cycle parking standards, supports the move to using SAM methodology as it provides a more realistic assessment of accessibility and car dependency, but considers there is continued scope for local evidence and site-specific judgment to be applied where suburban and local circumstances justify it.

Chapter 6 - Place visions and place-based approaches

PV1 Brownfield first Opportunity Areas (BFOAs)

The Council has made a number of representations under Policy MBUL1 which it considers are also relevant to Policy PV1.

PV2 Central Activities Zone (CAZ)

The Council has no specific comments on this policy, which applies only to development within the Central Activities Zone and the Northern Isle of Dogs. However, the Council emphasises the importance of supporting growth not only within these areas, but also across London's town and local centres, to ensure the benefits of investment, employment and regeneration are distributed more widely.

PV3 Town centres and high streets

The Council broadly supports draft Policy PV3, which seeks to support town centres whilst providing sufficient flexibility to enable them to adapt and evolve over time, including through the re-purposing of surplus commercial space. Draft Policy PV3 continues the town centre-first approach and seeks to

maintain access to services and economic opportunities, which aligns well with the objectives of the Richmond Local Plan's Living Locally approach (Policy 1). The provisions of draft Policy PV3(D) are particularly welcomed, as they support the designation of neighbourhood and local centres and high streets to meet local needs.

The Council notes that draft Policy PV3A(3) states that all town centres should be promoted as locations for housing-led intensification. Richmond's adopted Local Plan supports residential development within town centres, provided active ground floor uses are retained and commercial and community functions are not compromised. However, this is also addressed by draft Policy PV3A(4), which seeks to retain active ground floor uses, and therefore it is not anticipated that any significant conflict would arise with the Council's adopted policy approach.

As with the current London Plan, draft Policy PV3 continues to encourage the redevelopment of edge-of-centre and out-of-centre retail parks. In this context, the Council particularly welcomes draft Policy PV3A(9), which seeks to ensure that redevelopment in such locations does not result in an increase in retail or leisure floorspace unless in accordance with the local plan or justified through national sequential and impact assessments.

Draft Policy PV3(B) requires boroughs to include "ambitious" policies within their Local Plans for centres within the Mayor's network in order to accommodate economic growth and housing need. The Council's comments on the proposed Optimisation Framework are set out separately under Policy MBUL2. However, the Council notes that draft Policy PV3B(3)(ii) encourages upward extensions above town centre uses. Any future Local Plan policy approach towards upward extensions would need to be informed by the wider development plan framework, including heritage considerations, recognising the distinctive character, function and significance of individual centres.

The Council supports the encouragement of late-night and 24-hour premises within draft Policy PV3(B.2), particularly where this is qualified by the wording "where appropriate". This provides a balanced approach and aligns with the objectives of the Richmond Night-time Strategy and Richmond Growth Plan.

The continued support within draft Policy PV3 for Article 4 Directions restricting permitted development rights from Class E to residential use is strongly welcomed. Such directions are already in place across parts of Richmond and play an important role in protecting the vitality and viability of town centres.

The Council also welcomes the continued recognition within draft Policy PV3 of the need to restrict over-concentrations of particular uses where justified. This reflects a long-standing component of the borough's planning policy framework and remains an important mechanism for maintaining diverse and balanced town centres. However, the Council considers that the approach to hot food takeaways in the draft Plan has been significantly weakened compared to the current London Plan. In particular, draft Policy PV3 does not retain the strategic approach established through Policy E9 of the London Plan 2021, which seeks to resist new hot food takeaway uses within 400 metres walking distance of the entrances and exits of existing or proposed primary and secondary schools as part of wider efforts to tackle childhood obesity and reduce children's exposure to unhealthy food options. In combination with the more flexible approach to such uses in the 2026 NPPF, this risks weakening the established strategic approach to managing hot food takeaway development across London and reducing consistency in how public health considerations are addressed through planning policy. The Council therefore considers that a stronger strategic policy approach should be retained.

Suggested modification:

- NEW criterion PV3(A.10) - Development proposals containing hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified. Boroughs should also carefully manage the over-concentration of hot food takeaway uses within town centres and other areas through the use of locally-defined thresholds in Development Plans.

Draft Policy PV3E retains protection for markets, which is welcomed. Whilst there are no permanent covered markets within the borough, markets continue to make a valuable contribution to the vitality, attractiveness and distinctiveness of town centres.

Town centre network

The Council welcomes the proposed amendments to the Mayor's town centre network set out in Annex B of the Draft Plan. Following informal engagement undertaken by the GLA with boroughs in late 2025, Twickenham is proposed to be reclassified as a Major Centre. Richmond would remain the borough's other Major Centre.

The proposed reclassification of Twickenham is supported. It appropriately recognises the centre's strategic role, including its association with a major international sporting venue, together with the opportunities arising from riverside regeneration proposals, which have the potential to further diversify and strengthen the town centre offer.

The retention of East Sheen, Teddington and Whitton as District Centres is also supported. The Council further notes that Kingston is proposed to retain its designation as a Metropolitan Centre, which is consistent with its strategic role within the wider sub-region.

Night-time economy classification

The proposed night-time economy classifications are supported. The draft Plan introduces a revised approach under which all centres are assigned a night-time economy classification, differing from the current London Plan where only selected centres were classified. The introduction of the new NT4 category, 'Centres with Local Significance', results in both Whitton and East Sheen being classified within this tier.

Richmond would remain within NT2 (Centres of Regional or Sub-Regional Significance), whilst Twickenham and Teddington would remain within NT3 (Centres with More than Local Significance). The Council considers these classifications to be appropriate and notes that they do not represent any substantive change in the relative status of centres within the borough.

PV4 Strategic economic clusters and corridors

The Council notes that no Strategic Economic Clusters have been identified in Richmond. While the Council understands that this reflects the selection criteria used, which focus on clusters not already covered by existing designations such as town centres or designated industrial land, it considers that Policy PV4 and/or its supporting text should provide stronger recognition of the internationally significant innovation assets identified in the London Growth Plan which do not meet the criteria for designation as Strategic Economic Clusters in the draft Plan, and which may provide an important basis

for future Local Plan policy development. The Council also considers that the London Plan should have regard to locations identified for growth through individual borough Growth Plans.

PV5 Industrial land supporting housing growth

The Council recognises the importance of increasing housing delivery across London. Notwithstanding its wider concerns over the assumptions made by the Plan regarding industrial land release, the Council welcomes the fact that the Plan seeks to establish a predominantly local plan-led approach to identifying the most appropriate locations for industrial land release. However, the Council has significant concerns regarding the evidential basis upon which these assumptions have been made, and the cumulative impact of Policy PV5 on the long-term supply of industrial land and its relationship with the objectives of Policy GLE2, which seeks to maintain and increase industrial capacity to meet future strategic needs.

The Council notes that Policy PV5(A) requires boroughs to consider the release of SIL and LSIS within areas of Sustainable Access Measure (SAM) 4 and above, subject to a series of exclusion criteria. Given that certain parts of the borough fall within SAM 4 and above (mainly in the east of the borough and Twickenham), the Council notes that some of its designated Locally Important Industrial Land & Business Parks (the borough's LSISs) will fall within the scope of the policy. While the exclusion criteria (1-5) provide some safeguards, the Council is also concerned that a number of its designated industrial sites have already been assumed prematurely through the additional industrial land component of Richmond's ten-year housing target, which for Richmond is 181 homes, which risks prejudicing the outcome of future plan-making and site-specific assessments undertaken pursuant to Policy PV5. In this context, the Council questions the extent to which Policy PV5 facilitates a genuinely plan-led approach to the consideration of industrial land release, given that assumptions regarding the contribution of such land to housing delivery have already been incorporated into the draft Plan's housing targets. While this figure may appear modest (in comparison to other boroughs), it could require a proportionately significant loss of industrial land locally, despite both local and London-wide evidence indicating continued strong demand for industrial land, with a corresponding impact on the availability of jobs locally.

Detailed comments on the specific requirements of Policy PV5 are set out below:

The Council has considered the exclusion criteria set out in Policy PV5(A) and considers that several elements would benefit from further clarification as there is limited clarity regarding how certain criteria should be interpreted and applied in practice. Given the potentially significant implications of the policy for the future release of designated industrial land, the Council is surprised by the relatively limited detail provided within both the policy wording and supporting text (particularly when compared with the considerably more detailed criteria used through the SHLAA to identify additional housing capacity on industrial land and exclude areas from consideration for release). The Council is also concerned that the policy (even in draft form) risks creating uncertainty in the shorter term regarding the future role of industrial land in the borough, impacting investment decisions by landowners, occupiers and developers, including on sites that continue to perform an important economic function and where investment in industrial floorspace is planned or ongoing.

Policy PV5(A.1) requires sites to contribute to strategic and local needs based on the Spatial Strategy be excluded from consideration for industrial release. The Council notes that both the Council's existing evidence base and the strategic base prepared in support of this draft Plan identifies a significant

ongoing demand for industrial land across London. In this context, it is unclear to what extent designated industrial land could be considered surplus to either strategic or local requirements, and further explanation would be welcomed regarding the circumstances in which a site would be considered not to contribute to these needs. Paragraph 6.33 states that this criterion only applies “if insufficient capacity has been identified to meet this need”, however, given the evidence of ongoing demand and supply pressures, the Council considers that this is likely to be the case in most circumstances and therefore questions the practical effectiveness of this criterion.

Policy PV5(A.2) relating to infrastructure uses is supported. However, further clarity should be provided, either within the policy or supporting text, regarding the types and range of infrastructure uses that are intended to be captured by this criterion to support consistent interpretation and application.

Policy PV5(A.3) relating to clusters of designated industrial land with very good freight access is supported. However, the policy should provide further clarity regarding how "very good freight access" is to be defined and assessed to ensure a consistent approach across London. Appendix B (Freight Access Clusters) of the London Plan Industrial Evidence Paper (2026) provides some useful additional detail in this regard which is not currently reflected in the draft Plan itself.

Policy PV5(A.4), relating to the protection of sites within the CAZ and the surrounding 3km buffer is noted. The Council also considers that consideration could be given to introducing a mechanism within the draft Plan for PMAs to work collaboratively to identify other strategically important industrial locations that warrant a similar level of protection, where supported by evidence demonstrating a strong economic, functional or supply chain role.

Policy PV5(A.5) relating to the effective operation of remaining uses suited to industrial land is supported. The Council considers that additional guidance in the supporting text would be helpful regarding the factors that should be taken into account when determining whether the release of a site (or part of it) would undermine the effective operation of the wider designated industrial area.

The Council notes the locations identified in Policy PV5(B) for development management-led industrial land release, which do not include any sites in Richmond. While the Council recognises the rationale for these sites set out in the supporting text, together with the more detailed justification and methodology contained within the *London Plan Industrial Evidence Paper (2026)*, there are concerns that these sites have been identified for this approach well ahead of any formal collaboration by the relevant PMAs. This risks pre-empting the collaborative, plan-led approach to industrial land release envisaged under Policy PV5(A) and could prejudice discussions between boroughs on how any loss of industrial capacity should be addressed, including how capacity should be reprovided, intensified or redistributed elsewhere within the same PMA. The Council also notes that the draft Plan identifies substantial housing capacity arising from industrial land release across London, although the distribution of this capacity is uneven. Taken together, this raises concerns that significant assumptions regarding industrial land release have already been established in advance of the collaborative PMA-based approach that is strongly encouraged elsewhere in the draft Plan.

The London Industrial Land Supply Study – Main Report (March 2023) found that there were 3,800 total industrial jobs in Richmond in 2019, representing 4.6% of total employment. Just over half of these jobs (56.1%) were located within designated industrial areas. By comparison, the borough's own employment evidence (Employment Land and Premises Needs Assessment, 2021) identified 8,403 industrial and warehousing jobs in 2019, based on Experian data and the report author's own analysis.

The London Plan's focus on future employment land release being concentrated on industrial sites in the borough seems counter-intuitive in the Richmond context, where there is very limited industrial land supply and extremely low vacancy rates, as set out in the Council's response under Policy GLE2. In recent years, the Council has experienced much higher levels of availability across its office stock, and the absence of specific strategic guidance on offices in the draft Plan to assist the development of Local Plan policies and the consideration of future planning applications is noted in the Council's response under Policy GLE1.

Notwithstanding the safeguards at Policy PV5(A), the Council is concerned that the policy places significant emphasis on the release of industrial land when other parts of the draft Plan seek to safeguard and intensify industrial capacity. Whilst supporting housing delivery is an undoubtedly an important objective, the Council considers that there is an inherent tension between Policy PV5 and Policy GLE2. There is a risk that the cumulative effect of industrial land releases could undermine London's ability to meet its future industrial, logistics and storage and distribution requirements, particularly in boroughs where opportunities to identify replacement industrial land are extremely limited. Furthermore, despite the Council's willingness to work collaboratively with neighbouring boroughs and other authorities within the relevant PMAs to meet strategic industrial needs, there is no guarantee that capacity lost through industrial land release in Richmond can be accommodated elsewhere while continuing to serve the same local markets, supply chains and operational requirements, many of which are highly localised and rely on proximity to specific customer bases, labour markets and supporting business networks.

The Council is also concerned by the approach to the redevelopment of non-designated industrial land for housing and mixed-use development under Policy PV5(C). The policy appears to establish a presumption in favour of such development, subject only to a limited set of exclusion criteria, including those relating to SAM accessibility levels. The Council considers that this approach is overly permissive and could result in the incremental loss of smaller non-designated industrial sites that collectively make an important contribution to local employment, servicing and business needs, particularly in boroughs where opportunities for industrial intensification and the designation of new industrial land are already constrained. The proposed approach could also allow the loss of such sites without first adequately testing whether there remains demand for continued industrial use or other employment-generating uses, potentially resulting in the premature release of land that could otherwise continue to support jobs and economic activity.

Not all of the borough's existing industrial sites are currently designated as industrial land, with designation status often reflecting a range of factors, including the relatively small size of some sites. However, cumulatively, these sites make a significant contribution to the borough's supply of industrial land and availability of local jobs. The London Industrial Land Supply Study 2020 Main Report (March 2023) reports that just over half (56.1%) of the borough's total employment in industrial activities (approx. 3,800 jobs) were located within designated industrial areas, meaning that non-designated industrial land in the borough remains significant in the provision of industrial-based jobs. It may be that under a future Local Plan review the borough could consider designating further industrial sites, however there is likely to be a time lag before any such review could be undertaken as the identification and designation of additional industrial sites would need to be considered through the Local Plan process. As a result, following adoption of the London Plan there may be an interim period during which non-designated industrial sites that make a significant contribution to local employment, servicing and

business needs are vulnerable to redevelopment, potentially resulting in the loss of industrial capacity before opportunities to identify and designate additional sites can be considered through the plan-making process.

As a minimum, it is considered that criterion (1) under Policy PV5(A), which requires designated sites that contribute to strategic and local needs based on the Spatial Strategy to be excluded from release, should also be applied to proposals involving non-designated industrial land where such land performs, or has the potential capacity to perform, an important strategic or local industrial function, so that the Council can ensure the borough's limited reservoir of industrial land is maintained over the longer term.

In light of the above, the Council has concerns over the soundness of Policy PV5, and the evidential basis for the strategy that it seeks to promote. It considers that this policy is inconsistent with national policy, as it fails to balance the need to plan for all uses and its relationship with housing targets does not reflect the national policy definition of 'developable' (as elaborated on under Policy HN1), is not appropriate, as it is not an evidentially appropriate strategy to enable sustainable development given there is no assessment made of the economic impacts of industrial land release, and is not effective, as there is insufficient evidence that local plans have a reasonable prospect of implementing its spatial strategy having regard to the unproven suitability or availability of this land. For these reasons, the Council considers that the Plan's approach to PV5 should be fundamentally reviewed, and the GLA should remove or reduce the contribution that industrial land is expected to make to its housing target, to ensure that the Council's Local Plan is not prejudiced by the inclusion of an industrial land assumption, and to work with the Council to consider matters including:

- A robust assessment of the economic impacts of such significant release of industrial sites in a PMA, including disruption to local and strategic economies, jobs and supply chains
- A fundamental re-examination of the availability of land assumed appropriate for release to ensure that only land that meets the definition of 'developable' is included in the 10 year targets

The Council considers that the evidence base and policy approach underpinning Policy PV5 should be reviewed, particularly in relation to the assumptions regarding industrial land release, the assessment of economic and employment impacts, and the interaction with the objectives of Policy GLE2. The Council also considers that further work is required to demonstrate that the proposed approach is justified, effective and capable of being delivered in practice, and would welcome the opportunity to contribute to further discussions on these matters as part of the Examination process.

PV6 Metropolitan Open Land (MOL)

The Council considers that MOL plays a vital role for Londoners in supporting their health and wellbeing by providing opportunities to access open spaces and informal and formal recreation and sport (parks, playing fields, or natural landscapes for example) that can support both physical and mental well-being. In addition, MOL serves a strategic role in maintaining and enhancing connectivity of the blue and green infrastructure network which is essential in supporting biodiversity and the local environment. MOL is also recognised as playing an important role in providing areas of resilience to climate change which are critical in supporting the delivery of policies to combat climate change.

Although previously presented as separate policies in the current London Plan, the Council support the draft Plan going further to uncouple the policy approach for Green Belt (PV7) and Metropolitan Open

Land (PV6), in setting out two distinct policies. It is made clear that the criteria for designating MOL and the five Green Belt purposes are different. This separation is welcomed by the Council as it allows for continued strong protection of MOL which is strongly supported.

There is helpful clarification that policy for the release of Green Belt to meet development shortfalls or in relation to grey belt does not apply to MOL, and that established precedents for applying tests for exceptional and very special circumstances will continue to apply.

The crux of policy is retained, that land designated as MOL (covering 53% of the borough) should remain permanently open and protected from inappropriate development. Policy sets out the continued need to enhance the accessibility, value and function of MOL, including a new reference to work with adjoining boroughs to link up isolated pockets, all of which is welcomed.

The draft designation criteria for new MOL are largely welcomed. They have been revised in part. The criterion relating to strategic corridors has more prominence in the draft policy which is supported, as land forming part of a strategic corridor would no longer need to meet one of the other criteria in order to qualify for designation as MOL.

Elsewhere parts D & E of the plan-making element of policy are supported. The policy includes specific reference to consideration of redesignating Green Belt as MOL as part of Local Plan reviews which is strongly supported. This gives due prominence to ensuring that land, if any, which is released from Green Belt can continue to perform an important strategic open space function much valued by local communities.

However, it is noted with some concern that land must be of metropolitan-wide significance in terms of the functions set out in C (1). This represents a change from the adopted policy, which refers to land serving either whole or significant parts of London, which therefore raises the threshold for designation of new MOL. This, when considered alongside the requirement for new MOL parcels to be "extensive greenspaces" (PV6 C (1) (ii)) could make the identification and designation of new MOL challenging, for example, where land performs an important strategic function for a significant part of London but may not be considered 'extensive' in isolation. The Council therefore considers that further clarification would be helpful on what is meant by extensive in this instance. In addition, the requirement to meet both C (1) and one or more of C (1) (i) to (iii), is a significant shift and suggests land will be excluded from the definition, despite its comparable role and function being similar to existing MOL.

In terms of release of MOL, PV6 C (2) provides a non-exhaustive list of where exceptional circumstances **may** exist. (Related to this point, it is noted that para 6.42 refers to (2) (ii) as 'criteria' for releasing the site rather than potential examples.)

The Council raises some concerns in relation to the public accessibility of MOL as set out in various instances in the draft policy and implementation section, whilst noting that this is a reasonable ambition.

Existing MOL across the borough includes both public and private land and land which is publicly accessible only where a fee is paid for entry or membership. Although it is recognised that release can only happen through the local plan process, there are concerns that the policy could be interpreted as facilitating de-designation of some areas of MOL largely on the basis of public accessibility or management practices (albeit as mentioned earlier, the list of potential exceptional circumstances provides examples rather than release criteria).

There is a helpful reference in paragraph 6.41 that boroughs are not required to assess existing MOL, however over time this distinction may not be justifiable if through future Local Plans the evidence base for a site designations are questioned. It seems intended that the designation criteria relate to new MOL designations. However, they may also be relevant to the release of MOL. C (2) (i) states that an exceptional circumstance for release may exist if the area does not meet the criteria for designating new MOL (qualified by "*and is not in a walkable AoD for AGS*"), the criteria includes reference to public accessibility in C (1)(i).

Furthermore, another example of an exceptional circumstance for release is set out in C (2)(ii) where:

> *"the area is not publicly accessible due to physical, charging or member-only access restrictions **or** is within a walkable AoD **and** there is no reasonable prospect of public access being granted without enabling development…"*

Further advice is provided in the implementation section, suggesting that whether the site is publicly accessible will be assessed on a case-by-case basis, and may include fee paying sites where fees are nominal. Arguably this could apply to most, if not all, commercial and potentially community providers of recreational or sports facilities. This could, perhaps unintentionally, increase pressure to release land in MOL from landowners seeking more flexibility. It could also lead to policy being applied inconsistently.

Another consideration is whether in PV6 C (1) i, the requirement for public accessibility, could theoretically result in some land being excluded from MOL which could perform a meaningful role as such in the future. For example, school playing fields which are not currently publicly accessible but which could in the future provide an important contribution to the MOL network through community or dual use of sports facilities. The Council considers that the policy should provide sufficient flexibility to recognise the potential future strategic function of such land. Further clarification would therefore be welcomed on the intended interpretation and application of 'publicly accessible', particularly given that MOL is a London-specific designation and is not directly addressed in national planning policy.

Turning to the development management element of PV6, there is more emphasis on identifying when development in MOL would be appropriate.

In Part F, it is considered that the first sentence would be stronger if the words "*as guided by the criteria in C(1)*" where deleted.

Part G (1) could be interpreted as relaxing the policy approach for minor development, if minor is to be interpreted in the wider planning sense (less than 10 houses/ site of less than 0.5ha), even with the qualification that it should also be beneficial to the strategic function of the MOL set out in part C(1) i and ii. Minor development is not defined in the Draft Plan's glossary. The Council considers that developments of up to 9 houses can have a significant impact on openness. Further clarification is needed if the intention is to restrict appropriate development to very minor works.

It is noted that Previously Developed Land (PDL) is qualified as '*above ground structures'*. It would be helpful to clarify whether this is intended to exclude large areas of hardstanding as appears in the NPPF definition (retained in the recently published NPPF).

In Parts G2 and G3 "appropriate uses" are referred to. Further definition would be helpful, noting that the list of uses in G3 includes outdoor sport etc and therefore the list is not exhaustive.

In addition, Part G (3) seeks to preserve the openness of only the 'remaining' MOL. The Council would support removal of the wording 'remaining' here in order to strengthen the policy, so that the impact of the development on the whole site can be assessed.

The London Green Belt Assessment: Metropolitan Open Land Opportunity Review (May 2026):

This Review, led by the GLA, is a high-level report that was published alongside the draft Plan, produced without collaborative inputs from boroughs. The Council notes and supports that draft policy PV6 states that there is no requirement for boroughs to review MOL in their areas.

The Review provides a high-level review of Green Belt areas that may have potential to meet the MOL criteria as set out in London Plan 2021 Policy G3. The Council understands that this report demonstrates the assumptions made and is to be regarded as a starting point for any consideration of re-designation of parcels which would need to be assessed at the local level, with any changes taken forward through the Local Plan process as fully justified exceptional circumstances. It is also acknowledged that such an assessment would need to relate to the revised MOL designation criteria in the draft Plan (as amended through any subsequent revisions).

It is expected that the assumptions will be reviewed to consider the appropriateness of the methodology and implications for its practical application to sites, and the Council would welcome the opportunity to contribute to further discussions as part of the Examination process. Overall, the Council recognises the benefits of the broad approach set out in this review, and supports how the draft Plan signposts that redesignation can be justified and progressed through the Local Plan process based on local evidence.

PV7 Sustainable development and enhancement of the Green Belt

The Council considers that the Green Belt performs important strategic functions beyond meeting development needs, including supporting landscape, character, biodiversity, climate resilience, recreation and sport and the separation of settlements, and these functions should continue to be given significant weight in any future consideration of Green Belt land. Any changes to Green Belt boundaries should therefore remain subject to the plan-led process and robust borough level evidence, as referred to in Draft Policy PV7.

The Council recognises that this policy has been amended to reflect changes to national planning policy, including the introduction of grey belt. It is noted that, whilst the policy continues to recognise the strategic importance of the Green Belt, it represents a significant change from the previous London Plan by, in particular, introducing a framework for considering development within defined BLG, and for considering, where justified, the release of Green Belt in sustainable locations. It is clarified that no component of the housing target for the borough is "greenfield", nor are there any Broad Locations for Growth (BLGs) identified in Richmond's Green Belt, which is supported by the Council.

The Council remains of the view, which is consistent with the draft Plan, that all other sources of housing supply should be prioritised before any consideration is given to Green Belt release, consistent with the need to maximise opportunities for development within the existing urban area.

It is noted that no stations in the borough are identified as suitable to accommodate major residential growth nor junctions suitable to accommodate major growth for industrial.

There is a development management route to considering major development proposals outside of BLG, however this sets out that significant weight should be attributed to a failure to meet any of the requirements in PV7A-C and is set out in a way to ensure it doesn't undermine the overall plan-led approach. The Council considers that it could be clearer which elements of policy apply to proposals outside of BLGs and whether development which is below 'major' development is given satisfactory attention, if major is intended to be defined in the wider planning sense.

The Council supports the principle of directing Green Belt release towards the most sustainable locations, including the recognition that some grey belt locations maybe less suitable for development than other locations within the Green Belt. However, the sustainability of locations should be demonstrated through robust evidence, including consideration of existing and planned public transport accessibility, capacity, opportunities for walking and cycling, infrastructure requirements and the deliverability of necessary transport improvements. Proximity to transport facility should not, in itself, be taken as evidence that a location can accommodate significant additional growth sustainably. The Council also considers that there should be sufficient certainty that transport infrastructure underpinning identified BLGs is funded and deliverable alongside growth. The Council also considers that the Plan should ensure that development outside identified BLGs does not undermine the delivery or, or investment in, the transport infrastructure required to support the Plan's strategic growth strategy.

The Council generally supports the policy approach towards enhancement opportunities in the Green Belt.

The Council has some concerns that in PV7 E (iii) a net density of at least 90 d is proposed, and consider that densities achieved should take into account all plan policies including heritage and other local considerations.

London-wide Green Belt Assessment and other related evidence base

It is expected that the assumptions will be reviewed to consider the appropriateness of the methodology and implications for its practical application pan London, and the Council would welcome the opportunity to contribute to further discussions as part of the Examination process.

For comments on the Metropolitan Open Land Opportunities Report see response to PV6.

The London-wide Green Belt Assessment:

LUC were commissioned by the GLA and participating boroughs to undertake a strategic Green Belt Assessment for London[39]. It is recognised that there has been a very considerable amount of work undertaken to progress the GBA. Richmond is one of the participating boroughs and was nominated as a pilot. The Council took part as it is recognised that Green Belt is a strategic, cross-boundary issue for the Mayor to consider at a pan London level. The Council's comments will not repeat the details of previous feedback provided on the emerging assessments; however concerns were particularly focused around the geographical details and landscape characteristics that could be captured given the strategic nature of the study. It is noted that some of which has been taken account of as the reports have progressed. The Council welcomes the FAQs produced to accompany the GBA, which support

[39] London-wide Green Belt Assessment Report

communications and help contextualise the GBA as a piece of technical planning evidence with specific and limited applications. This strategic GBA can only provisionally identify sites as potential grey belt which is an important point for the Council. Only Local Plans can alter Green Belt boundaries after locally focused research has been undertaken and the need to meet development needs has been considered.

London Green Belt Enhancement Opportunities Greater London Report:

The Council broadly supports this report. As with the MOL Opportunities Report (see comments on PV6), the Council understands that this report is intended to be a starting point, drawing on information on projects already in the public domain and not comprehensive. It particularly recognises opportunities across borough boundaries which could be taken forward in Local Plans. The Council broadly supports the principles to enhance green infrastructure within the Green Belt, and there are positive cross-boundary aspects identified in the Feltham and Hounslow (Cluster I) which reach into the borough, towards improving public access and connectivity. While positive aspirations, there is a concern that the link through part C of Policy PV7 to identify opportunities and infrastructure for Local Plans to deliver may not be sufficient, without funding and additional support.

PV8 Strategic and local views

The Council generally supports Policy PV8, which largely consolidates existing London Plan policies HC3 and HC4. Richmond adopted a Local Views SPD[40] in 2026, which supports the implementation of the Local Plan and the protection of the local views identified on the borough's Policies Map, as well as the strategic view from King Henry VIII's Mound to St Paul's Cathedral, which is protected through the London View Management Framework (LVMF).

The Council welcomes the reference in Policy PV8(F) to the requirement for a Townscape and Visual Impact Assessment (TVIA). However, the Council considers limiting this requirement to 'major' development to be inappropriate. Whilst in practice most tall building proposals are likely to meet the thresholds for major development, the definition of major development may change over time, and proposals below the major threshold may nevertheless have the potential to adversely affect designated views. The Council therefore considers that the requirement should also apply to any development proposal with the potential to harm the quality of designated local and strategic views.

Suggested modifications:

- PV8(F) - Where major development, and any other development that has the potential to adversely affect the quality of a designated view, is visible in the foreground, middle ground or background of a designated view, applicants should submit a proportionate Townscape and Visual Impact Assessment (TVIA) as part of the planning application…
- Paragraph 6.67 - … The policy and the linked LVMF provide an important tool for cross boundary coordination in the development process between plan-making authorities, and a model that can be replicated for local views so that there is a consistent approach to defining and managing local views across London, particularly in relation to tall building proposals, which can have visual impacts on sensitive areas beyond the authority in which they are located.

[40] LBRuT Local Views SPD (2026)

The Council notes that the Mayor is currently consulting on an updated London View Management Framework[41] and looks forward to reviewing and responding in due course. However, the Council provisionally welcomes the eastward extension of the Background Consultation Area for the strategic view from King Henry VIII's Mound to St Paul's Cathedral compared to the 2012 LVMF, noting the impact that the Manhattan Loft Gardens development in Stratford has had on this view, as referenced in the draft LVMF.

Draft Plan Annexes

Annex A Monitoring

The proposed Key Performance Indicators (KPIs) are welcomed. However, it would be helpful to provide greater clarity on the data sources and collection methods that will be used to monitor each indicator. It is unclear whether the necessary datasets are already available and collected consistently across all London boroughs, or whether some KPIs would require new reporting processes or bespoke data collection. Given the ongoing implementation of National Planning Data Standards and wider digital planning reforms, Annex A could usefully identify which indicators are expected to be monitored through standardised planning data and which require separate monitoring exercises.

Annex B Town Centre Network

Please see the Council's response to Policy PV3.

Annex C Green Belt sustainable locations

The Council note that there are no such locations proposed within the borough and have no comments.

Annex D Transport interventions

The Council welcomes Annex D as a consolidated schedule of transport interventions and notes that it builds on the indicative transport schemes identified in Table 10.1 of the adopted London Plan.

The Council considers that the Annex provides a useful link between transport investment and the delivery of growth. However, greater clarity is needed regarding the funding, prioritisation and deliverability of identified interventions, particularly where planned growth is reliant on transport improvements that are not yet committed or funded.

The Plan should clearly distinguish between committed schemes, funded schemes, and longer-term aspirations to provide greater certainty regarding delivery and to ensure that growth assumptions are based on a realistic assessment of infrastructure provision.

The inclusion of an intervention with Annex D should not, in itself, be taken as confirmation that it will be delivered within the timeframe required to support growth.

The Council considers that Annex D should be kept under regular review to reflect changes in the funding, delivery programmes and transport priorities.

[41] Consultation on the updated London View Management Framework (LVMF) (September to December 2026)

Annex E Brownfield First Opportunity Areas strategic growth visions

No comment.

Annex F Public service infrastructure

The Council supports the inclusion of Annex F and welcomes the approach to plan strategically for public service infrastructure requirements across London. The identification of strategic requirements for health, emergency services and prison infrastructure is helpful in recognising that growth depends on housing and employment but also on supporting public infrastructure.

The Council supports the recognition that planning for public service infrastructure should be informed by demographic change and that local planning authorities should engage proactively with infrastructure providers during Local Plan preparation. The inclusion of quantified requirements provides a useful starting point for strategic discussions regarding future service provision and cross-boundary infrastructure planning.

However, the Annex would benefit from further clarification regarding how London-wide floorspace requirements should be translated into borough-level infrastructure requirements. Whilst strategic London-wide forecasts are useful, planning authorities require a clearer understanding of how these feed into local requirements to meaningfully inform Local Plan preparation, site allocations and infrastructure planning.

The Council notes that requirements for schools, early years provision, social care facilities and libraries are not quantified within Annex F and are instead expected to be planned at borough level.

The Council recognises the strategic need for prison capacity identified by the Ministry of Justice and acknowledges the importance of planning for all forms of public service infrastructure. However, the identification of approximately 86,000 sqm of prison-related floorspace through population growth raises deliverability questions in London's land constrained context. The Council recommends that additional details be provided regarding the likely geographic distribution of need and how local planning authorities are expected to consider prison requirements through Local Plan preparation.

Overall, the Council welcomes the principle of identifying strategic public service infrastructure needs but considers that Annex F should more clearly explain how local authorities are expected to use the information in practice to plan for public infrastructure.

Annex G Strategic Industrial Locations

No comment – there are no designated SILs in Richmond.

Appendices

Appendix 1 – Comments on the 2026 London Strategic Housing Land Availability Assessment (SHLAA)

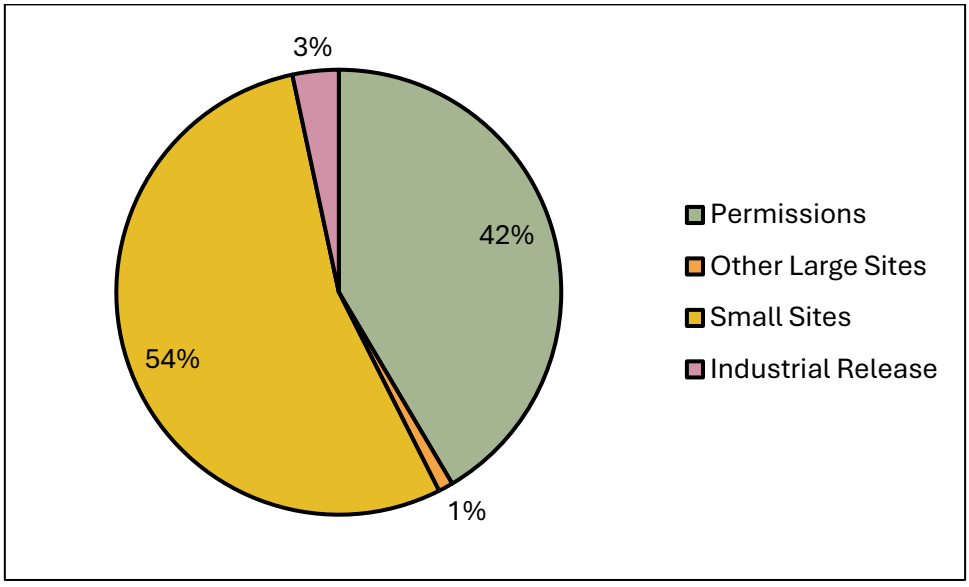
Appendix 1 sets out the Council's comments on the 2026 London Strategic Housing Land Availability Assessment (SHLAA) (September 2026). These comments discuss each component of Richmond's proposed housing target in the draft London Plan and focus on specific aspects of the SHLAA methodology, assumptions and outputs relevant to the borough.

- Table 1 and Figure 1 set out Richmond's draft 10-year housing target for the period 2027/28 to 2036/37 and the contribution expected from each housing supply component:

Table 1 - Breakdown of each component of Richmond's draft London Plan housing target by source of supply (net units)

Permissions	Other Large Sites	Small Sites	Industrial Release	Green Belt	Total
2239	58	2919	181	0	5397

Figure 1 - Composition of Richmond's draft London Plan housing target by source of supply



Permissions

- The SHLAA attributes 2,239 homes to Richmond through the 'permissions' component of the housing target. This component is derived from large residential sites with planning approval recorded in the Planning London Datahub (PLD) and incorporated into the Land4LDN platform. The SHLAA applies phasing assumptions, informed by both borough-provided delivery trajectories and Land4LDN's system-calculated build-out model, to estimate the contribution of permissioned schemes to housing supply over the period 2027/28-2036/37.

- The Council notes that there are some differences between the phasing assumptions applied in the SHLAA and those set out in the Council's latest published Housing AMR (2024/25)[42] for the period 2027/28-2036/37. However, in most cases these differences are relatively minor and are not considered to materially affect the borough's overall housing capacity over the plan period.
- The main exceptions are a small number of specific sites that the Council has separately drawn to the GLA's attention, where differing phasing assumptions may have a more significant effect on the anticipated timing of housing delivery within the period 2027/28-2036/37. Nonetheless, the Council would welcome the opportunity to update the phasing assumptions for these sites, and any others where more recent monitoring information is available, noting that paragraph 3.13 of the SHLAA anticipates a future update to the report to reflect confirmed completions and updated monitoring evidence.

Other Large Sites

- The Council notes that 58 homes are attributed to Richmond through the "Other Large Sites" component of the housing target. This component is derived from the remaining stock of large sites assessed through the Land4LDN platform, including adopted and emerging site allocations, sites submitted through the Call for Sites, sites identified through borough evidence, and sites carried forward from the 2017 SHLAA. The SHLAA applies site-specific capacity and phasing assumptions to these sites and discounts identified capacity where necessary to reflect likely viability conditions over the period 2027/28-2036/37.
- The Council notes that the SHLAA has sought to account for viability considerations through the application of viability discounts to 'other large sites' and has also tested borough-provided capacity assumptions for non-permissioned sites against the proposed Optimisation Framework. While the Council's concerns regarding the Optimisation Framework are set out separately in its response to Policy MBUL2, it is notable that, in Richmond, the testing of capacity assumptions against the proposed Optimisation Framework appears to have had a relatively limited impact on final capacity estimates. This may reflect the relatively limited number of large development sites in the borough, but also the importance of a design-led approach in a borough characterised by significant heritage, townscape and environmental constraints. In most instances, design-led capacity assessments provided by the Council and supported by site-specific evidence were accepted by the GLA.

Small Sites

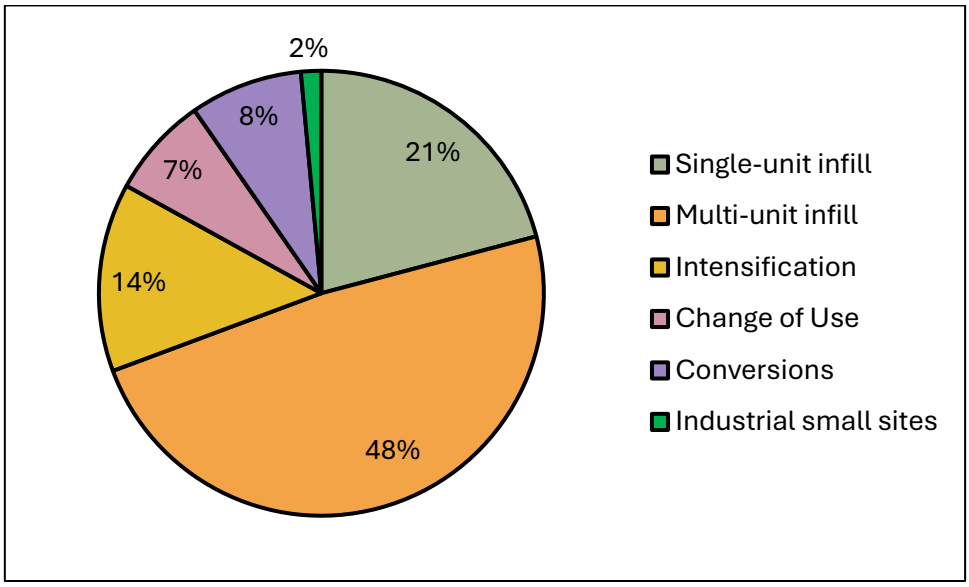
- The small sites component of Richmond's housing target comprises 2,919 net units, representing 54.1% of the borough's overall housing target of 5,397 net units. Table 2 and Figure 2 show the contribution of each small-site typology to this total:

[42] Richmond Local Plan monitoring webpage – see Housing AMR 2024/25 and Housing Trajectory and Summary Tables 2024/25

Table 2 – Breakdown of the small sites component of Richmond's draft London Plan housing target by development type (net units)

Single-unit infill	Multi-unit infill	Intensification	Change of Use	Conversions	Industrial small sites	Small Sites Total
610	1415	400	214	239	43	2919

Figure 2 - Composition of the small sites component of Richmond's draft London Plan housing target



Single-unit infill, multi-unit infill and intensification (demolition and rebuild)

- These small-site opportunities are defined in the SHLAA as:
  - **Single-unit infill**: empty or vacant sites with identified capacity for a single dwelling.
  - **Multi-unit infill**: empty or vacant sites with identified capacity for multiple dwellings.
  - **Intensification**: existing dwellings (detached or semi-detached only) with the potential to be demolished and replaced by multi-unit residential development.

<u>Identification of sites</u>

- According to the SHLAA 2026, the **single-unit infill**, **multi-unit infill** and **intensification** (demolition and rebuild) components are derived from a stock of potential small-site opportunities identified by RCKa to support the draft London Small Sites Design Code LPG. The dataset was generated using RCKa's machine-learning classification of freehold polygons and aggregated by borough and Sustainable Access Measure (SAM) band (*the Council notes that the small-site capacity attributed to SAM band 2 is divided between 2a and 2b within the detailed borough schedule, which do not exist within the SAM metric itself*).
- The SHLAA provides limited information on how the AI-enabled machine-learning classification process was validated, including the extent of any manual review undertaken and the degree of confidence that can be placed in the resulting identification of small site opportunities.
- Paragraph 8.17 states that the GLA was provided by RCKa with a "summarised dataset" of sites and capacity at borough and SAM-band level, classified by detailed site type. The Council notes that,

whilst borough-level outputs by small site type and SAM band have been made available, no site-level dataset, borough-level notional capacities, or information on the individual opportunities identified has been published alongside the SHLAA. This limits the ability of boroughs to understand, interrogate and verify the assumptions underpinning this component of the housing target.

- For all three typologies, sites were only included where they were located outside Flood Zone 3 and outside designated open space. The SHLAA does not define what constitutes "designated open space" for the purposes of this assessment, other than indicating that it includes Metropolitan Open Land, and the Council would welcome clarification on the full range of designations captured by this definition (noting that boroughs may have local designations that fall outside this definition, for example in Richmond there is also a larger number of sites designated as Local Green Space, Other Open Land of Townscape Importance and/or Public Open Space).
- For **intensification** sites, two additional filters were applied: sites within conservation areas and sites containing buildings constructed before 1919 were excluded from the analysis. Whilst the Council does not object in principle to these exclusions, they have the effect of concentrating reliance for future intensification delivery on a relatively limited subset of locations within the borough that fall outside these constraints (particularly in Richmond, where conservation area coverage is extensive and a significant proportion of the housing stock predates 1919). Following the subsequent viability filtering, all remaining intensification capacity was then concentrated further within SAM bands 3, 4, 5a and 5b only.

Notional capacity

- A notional capacity was then assigned to each site type. Borough-level notional capacities have not been published. However, the SHLAA identifies a combined London-wide notional capacity of 613,313 units across these three small site typologies.
- For **single-unit infill** sites, capacity was fixed at one dwelling per site. *Notional capacity = 257,521 units.*
- For **multi-unit infill** sites, capacity was derived by RCKa using a predefined lookup table linked to detailed small-site typologies, which were described as being "*drawn from analysis of completed exemplar small site developments*". A link is provided to *smallsites.london*, an interactive map of select small-site schemes across London. However, it is unclear which schemes, and how many, were used to inform the capacity assumptions applied to multi-unit infill sites. *Notional capacity = 174,250 units.*
- For **intensification** sites, capacity was calculated using indicative density assumptions linked to London Context Map settings, ranging from 80 units per hectare in Setting A (Predominantly Outer Suburban), to 155 units per hectare in Settings B-D and 269 units per hectare in Setting E (Large Town Centres and Central Core). The SHLAA states that these densities were derived from exemplar intensification case studies. However, it is unclear which case studies informed the density assumptions applied. The Council also questions whether use of the London Context Map for this purpose is appropriate when the Optimisation Framework at draft Policy MBUL2 does not apply to sites below 0.25ha. The Council further notes that the Optimisation Framework identifies a much wider range of densities across Settings B-D than is reflected here, and that paragraph 3.2.9 of the draft London Small Sites Design Code LPG states that "...*the London Context Map should not be*

used rigidly in applying this design code", perhaps suggesting limitations in its application to small sites. *Notional capacity = 163,542 units*.

Estimating realistic delivery rates

- Having established a notional stock of capacity, the GLA assessed historic rates of delivery by comparing completed developments between 2010/11 and 2024/25 against the identified stock of opportunities. Target delivery rates were then established for each borough, typology and SAM band using professional judgement informed by both the average delivery rate achieved over the full 15-year period and the best-performing three-year rolling average achieved during that period. The GLA generally set target delivery rates at levels broadly reflecting the best rates already achieved elsewhere in comparable locations.
- The delivery-rate assumptions shown in Appendix II can be broadly inferred from the graphs, but the relationship between those rates, the stated 25% and 50% uplifts, and the final outputs reported in Chapter 9 of the SHLAA is not transparent. The underlying delivery-rate assumptions have not been published in tabular form, making it difficult to fully replicate the methodology (given the relatively low resolution and difficult-to-interpret graphs in Appendix II). However, what is clear from the published outputs is that delivery-rate assumptions vary significantly by both typology and SAM band. The highest delivery rates are generally associated with locations considered more accessible (SAM bands 5a and 5b), particularly for multi-unit infill and intensification sites.
- For Richmond (and indeed many other boroughs), it appears that the best-performing three-year rolling averages used to inform target delivery rates were achieved across a range of different periods, with many of the strongest-performing periods occurring earlier in the 15-year assessment period rather than in more recent years. The Council would therefore welcome further clarity as to why these historic peak periods are considered to provide an appropriate basis for informing future delivery rates, given that they may reflect more favourable market and economic conditions than today.

Additional adjustments

- For **intensification** sites, viability testing concluded that opportunities within SAM bands 1a, 1b and 2 were unlikely to be viable and were therefore excluded from the final outputs. For the remaining intensification sites, the SHLAA states that sites were broadly viable provided that a minimum of six units were delivered. However, the SHLAA does not explain how (or if) this six-unit threshold was incorporated into the methodology. In practice, the number of units achievable on any individual small site would depend on site-specific characteristics and constraints, meaning some schemes may deliver fewer than six units and others substantially more.
- Delivery rates for intensification sites within SAM bands 3 and 4 were reset to 2% per annum to reflect a more marginal viability position, while higher delivery rates were retained in SAM bands 5a and 5b.
- The GLA subsequently applied further policy-driven uplifts to reflect the anticipated effects of the London Small Sites Design Code LPG, streamlined decision-making facilitated by the draft London Plan and wider planning reforms. Delivery rates were increased by 25% for multi-unit infill and intensification, and by 50% for single-unit infill, reflecting the GLA's view that improved planning certainty would stimulate additional delivery, particularly from owner-occupiers and small-scale developers. Whilst the Council acknowledges the potential for increased certainty to support

housing delivery, the scale of the assumed uplift appears ambitious and the evidence supporting it is not clearly set out in the SHLAA (other than a footnote reference to an international study which modelled the *potential* housing-supply effects of reducing development approval times, rather than evaluating the observed outcomes of a comparable implemented policy intervention).

Impact on Richmond

- Applying these assumptions resulted in Richmond's small-sites capacity of 610 single-unit infill units, 1,415 multi-unit infill units and 400 intensification units over the period 2027/28-2036/37. Together, these three typologies account for approximately 83% of the total small-sites component of Richmond's housing target.
- The Council estimates that the stated 25% and 50% delivery-rate uplifts may account for at least 500 units of the small-sites component of Richmond's housing target, equivalent to around 19% of the borough's overall small-sites capacity (and around 10% of the borough's overall housing target). The Council therefore considers that these assumptions have a material influence on the resulting housing target and would welcome further evidence demonstrating that uplifts of this scale are realistic and capable of being achieved in practice.

Change of use, conversions and industrial

- The **change of use**, **conversion** and **industrial small sites** components are derived using trend-based methodologies rather than from an identified stock of future development opportunities.
- For **change of use** (typically involving the conversion of commercial buildings, such as offices, retail or light industrial premises, to residential use), the GLA analysed residential completions classified as change of use and calculated an annualised delivery rate based on the most recent five years of delivery (with the SHLAA noting that delivery through permitted development peaked in 2016/17 before subsequently declining). This rate was then projected forward across the ten-year plan period. The SHLAA notes that change of use developments are not expected to increase beyond their historically observed levels and therefore no policy-related uplift was applied. The Council is content with this approach.
- For **conversions** (the reconfiguration or subdivision of an existing residential building to create additional residential units within the existing structure), the GLA analysed residential conversion schemes resulting in a net gain of dwellings over the period 2010/11-2024/25 and projected the resulting annualised delivery rate across the ten-year plan period. To account for overlap between conversion and intensification (demolish and rebuild) opportunities, the SHLAA applied a discount to the conversion capacity, reducing it by 10 per cent unless the identified intensification capacity was less than 10 per cent of the conversion figure. This was intended to avoid double-counting sites that could potentially come forward through either route. No policy-related uplift was applied, with future delivery assumed to continue broadly in line with historic trends. The Council is generally content with this approach, however, the SHLAA does not explain how the 10% discount figure was determined.
- For **industrial small sites** (residential development on sites below 0.25 hectares previously occupied by designated or non-designated industrial land), the GLA used the London Industrial Land Supply (LILS) as a baseline and assessed historic losses of industrial land to residential development, the GLA used the LILS data as a baseline and assessed historic losses of industrial land to residential development. Historic rates of industrial land loss were analysed by Property

Market Area and informed the application of a London-wide loss rate of 0.1 per cent per annum to the current stock of industrial land on a declining-balance basis. The resulting loss of industrial land was converted into housing capacity through application of the Optimisation Framework. No policy-related uplift was applied. Whilst the SHLAA explains the methodology at a high level, it does not set out the amount of small-site industrial land assumed to able contribute to this component of supply, and whether any exclusions were applied (for example in relation to waste, utilities and other constraints, as is the case for the larger industrial land release methodology).

- Additionally, it is unclear why, or how, the Optimisation Framework has been applied to this component of supply. The industrial small-sites capacity does not appear to be derived from an identified stock of specific sites and the SHLAA does not explain how projected losses of industrial land were translated into housing capacity through application of the Optimisation Framework. This is particularly relevant given that the draft London Plan states that the Optimisation Framework applies to sites of 0.25 hectares or greater, whereas the industrial small-sites component relates to sites below this threshold.
- Applying these methodologies resulted in capacities of 214 change of use units, 239 conversion units and 43 industrial small-site units. Together, these small site types account for approximately 17% of the small-sites component of Richmond's housing target.

Additional industrial release

- The SHLAA attributes 181 homes to Richmond through the additional industrial land release component of the housing target. This capacity is derived from industrial and related sites identified through the SHLAA and Industrial Land Supply Study processes as having potential to accommodate housing, including through release or intensification associated with changes to industrial land designations and policies.
- The Council has concerns regarding the proposed approach to industrial land set out in the draft London Plan (see comments on draft Policies GLE2 and PV5). Notwithstanding these wider concerns, the Council also has concerns regarding the methodology used to identify capacity through the additional industrial release component of the SHLAA.
- The Council understands that sites have been identified through the methodology set out in Section 11 of the SHLAA, including the application of a SAM band 4+ threshold and the use of the LILS dataset. However, the Council has separately raised queries with the GLA regarding a number of sites included within Richmond's additional industrial release component. These relate to matters such as the treatment of completed development, the existence of extant planning permissions (noting paragraph 11.6 of the SHLAA states that land covered by residential permissions in the PLD was excluded from the additional industrial release assessment), current site circumstances, and the continued operation or planned expansion of established employment-generating uses.
- Taken together, the Council considers that the additional industrial release component is likely to overstate the amount of housing capacity that could realistically be delivered within the ten-year housing target period (2027/28-2036/37), even when putting aside the Council's policy approach to the protection of industrial land. The Council is not persuaded that the methodology adequately captures a range of site-specific deliverability considerations and therefore does not consider that it provides a sufficiently robust assessment of whether sites are genuinely available, suitable or likely to come forward for residential development within the plan period.

- More fundamentally, the Council considers that the methodology used to identify additional industrial release sites is overly simplistic and places excessive reliance on spatial criteria, particularly the application of the SAM band 4+ threshold. The methodology does not appear to give sufficient weight to the specific characteristics, current use, economic function and recent investment evident at individual sites, nor to the implications that industrial land release could have for the retention of industrial and employment capacity.
- The Council is also concerned that the LILS dataset may not be sufficiently robust to support this element of the assessment in isolation. Based on the Council's review, some records appear to rely on information that is inaccurate or no longer fully reflective of current site circumstances (for example, sites that are no longer in industrial use, or sites categorised under broad industrial use classifications despite accommodating more specialised forms of employment activity).
- The Council also notes that capacity has been derived through application of the proposed Optimisation Framework. While the broad methodology is set out in the SHLAA, the Council would welcome further clarity regarding how the site capacities have been derived in practice and how the assumptions applied through the Optimisation Framework have informed the final capacity estimates.
- Paragraph 11.19 of the SHLAA states that "*there are various combinations of sites which could be developed in order to deliver the capacity identified*" for the borough. However, the Council does not consider this to be the case, as the site-specific circumstances affecting each identified site mean that they either will not come forward or are highly unlikely to come forward for residential development. As a result, the Council does not consider there to be realistic alternative combinations of sites capable of delivering the identified capacity.
- Overall, and notwithstanding the Council's wider concerns regarding the proposed approach to industrial land release in the draft London Plan, the Council considers that there are also a range of site-specific and practical considerations which cast significant doubt on whether the sites identified in Richmond are realistically capable of delivering the residential capacity within the ten-year target period. The Council has raised these matters separately with the GLA and considers that they collectively illustrate the limitations of a methodology that relies heavily on strategic spatial indicators rather than a detailed assessment of individual site circumstances.

Appendix 2 – Comments on London Plan Viability Study - Phase 1 Report

- Appendix 2 sets out the Council's comments on the 2026 London Plan Viability Study (July 2026). These comments set out the key concerns and/or queries with the Phase 1 study.

Overall strategy of the study

<u>Use of development typologies</u>

- The London Plan Viability Study (LPVS) applies the same approach as the Viability PPG for Local Plan viability studies with the use of typologies based on common site types across London (as stated in paragraph 4.7 of the LPVS). The study also looks at the likelihood that these different schemes and site types will come forward – for example, the notion that very few retail sites are likely to come forward across London, whereas residential sites of 30-50 homes are much more likely. The Council is generally supportive of this strategic approach, as it makes the LPVS more realistic, basing the study on the likely trend of London's growth in upcoming years. The Council also agrees that the finer grain approach to delivery is more realistic, for example it seems

counterintuitive to base London Plan thresholds on certain types of sites which are potentially less viable sites types which seldom come forwards.

- The Council supports the use of the Residual Land Valuation methodology used to determine the viability of different scheme typologies and site types, as described in paragraph 4.14 of the LPVS. It is logical that this follows the same methodology presented in the PPG. It is also important that this methodology uses standardised cash-flow based appraisal software (in this case being Argus Developer), which the Council supports.
- The Council is also supportive of the acknowledgement within the LPVS that Residual Land Valuation (the methodology used in the LPVS for area-wide viability analysis) can be highly sensitive to changes in assumptions which significantly impacts appraisal results – therefore, the viability evidence in the study should be subject to professional sense-checking and used alongside wider evidence to ensure best-informed policy formulation. In summary, the Council agrees that the LPVS as an area-wide viability analysis should be viewed as being indicative rather than wholly determinative.
- We have however, found the study difficult to follow and interpret and this is explored further below in our comments.

<u>Growth testing</u>

- The LPVS uses growth testing and assumptions regarding future growth to reflect the fact that the Draft London Plan is a long-term spatial strategy that will span multiple economic cycles and should therefore help shape market expectations, support confidence in the market and create conditions for future improvements in viability. The LPVS therefore adopts a long-term perspective that assumes market recovery, with explicit assumptions on growth in future residential sale and rent values (it is considered that London's underlying strengths which underpin its growth will remain) and affordable housing values (particularly due to a commitment of £1.5bn in low-interest loans through the Mayor or London's Social and Affordable Homes Programme (SAHP) 2026 to 2036) will help support long term recovery of the housing market. The Council is supportive of this approach.
- The Council is also supportive of the LPVS incorporating sensitivity testing, including growth modelling for strategic and phased developments, since using only current costs and values would be unrealistic for a long-term development assessment.

<u>Affordable housing delivery</u>

- The Council is supportive of the position within the LPVS that affordable housing delivery is a key component of maintaining housing output, particularly when combined with grant funding, low-interest loans and support for Registered Providers to support scheme viability, this is especially relevant in relation to early injections of cashflow from grant funding, faster absorption rates and lower levels of risk.

<u>Density and optimisation strategy</u>

- One of the key takeaways from the viability study is the significant impacts on viability associated within high rise development. The study identifies a viability "tipping point" in many outer London locations, where viability deteriorates once development exceeds six storeys due to disproportionately higher construction costs and the need for greater levels of subsidy, which

outweigh value gains. This is specifically identified as being an issue in Value Band D areas, which Richmond contains (mainly around the Teddington area). The LPVS advocates for increased levels of grant funding to help address the viability gap for higher rise residential buildings – the Council supports this notion.

- As a result of the viability difficulties high-rise buildings in Value Band D present, the LPVS promotes mid-rise development as a more viable form of site optimisation in these areas of London, a position of which the Council is supportive. This is especially relevant in Richmond due to numerous restraints such as design and conservation, which limit high rise buildings across much of the borough.
- The Council has provided further comments on the issue of high-rise development in the 'Heights' section below.

Tenure diversification and demand-side interventions

- The Council is generally supportive of the study's approach to promote tenure diversification across strategic sites to improve resilience, including improved absorption rates and build-out speed. However, it remains important to ensure that the tenures across a site are meeting identified needs. This is important to take into account as PBSA and PBSL remain viable tenures, meaning these can displace permanent C3 housing, and result in overconcentration of single person households which does not align with the requirements in the NPPF to support mixed and balanced communities. It is important to ensure an appropriate balance is provided especially on larger sites. The amendments which seek to require C3 affordable housing as part of these types of development are certainly a step in the right direction. We have however seen many sites which are constrained but can deliver a policy compliant level of affordable if using the equivalency principle. We would urge the GLA to ensure this route has been fully tested to ensure that this still provides the maximum level of affordable housing.
- The Council agrees that all forms of residential provision are important tools to support delivery of affordable housing and diversify demand, including PBSA and PBSL, as included in the approach in the Council's Local Plan. However, the Council considers the view that the LPVS provides around the role Build to Rent (BtR) plays in wider housing delivery as too narrow and lacking in appreciation of the level of viability BtR presents in especially inner-London - further comments on this issue are made in the 'Build to Rent' section below.
- The LPVS recommends consideration of demand-side interventions to stimulate sales rates and improve delivery performance in high density residential development, particularly in outer London where viability pressures are greatest and where housing affordability can be more easily improved. However, this does not entirely relate to patterns seen in Richmond, as despite being an outer London borough, market house prices have been historically high. Moreover, as people tend to move to outer London boroughs to have more space and greater access to family sized housing, increasing housing density on sites will not necessarily meet the type of housing in demand in the Richmond, which is likely to be the case for other outer London boroughs as well.
- As mentioned above, the Council accepts that there is a need to promote a greater tenure diversification within strategic sites to embed a greater resilience in the housing delivery pipeline (as stated in paragraph 1.55), however it is currently challenging to calculate if the level of affordable provided onsite meets the policy compliant thresholds. This is especially relevant on

sites with tenure-diverse mixed sites which may include PBSL, PBSA and C3 accommodation, it is not fully clear how the percentages have been calculated in the typologies where a mix of tenures is included. We would generally expect it to be done on a floorspace basis rather than habitable room basis (as stated in the London Plan - 3.42 which says that the affordable housing contribution should be assessed by floorspace where habitable room sizes are not comparable), however there is no worked example of how this has been done and how any shared amenity space etc is considered on that basis as part of mixed site typologies. We would recommended further clarity is provided on this as part of any phase 2 study, including a worked example to show it is realistic to onsite delivery. Further comments are included relating to this within our comments on co-living and student accommodation.

Typologies

- The study appears to include a total of 68 unique typologies across London, however, not all of the typologies are tested within each value band. Instead, the approach seeks to test the most common typologies in each area. Although Appendix 3 of the LPVS provides an explanation of the general approach to the selection of typologies in each value band based on referable and non-referable applications, Molior data, LPA websites and the SHLAA, the Council is concerned that the actual analysis of these data sources is not shared with the boroughs. There would have certainly been several methodological choices that led to the selection of typologies in each value band, including the threshold of prevalence for a specific typology that warranted its inclusion, which the GLA has not been transparent about. This makes it difficult for local authorities to analyse whether the inclusion of some typologies is fully justified by the prevailing evidence. The Council recommends that the Stage 2 London Viability Study includes a fuller explanation of how the typologies were chosen for each value band, including the underlying data which supports the selection of those typologies.
- As the selection of typologies is not directly comparable across value bands due to small variations in unit numbers, the overall viability of different typologies becomes difficult to assess across different value bands. The Council would recommend that the GLA provides a summary table listing all of the typologies tested across different value bands to make it easier to analyse.
- The housing mixes tested are also heavily weighted to small units with nearly half of the units proposed being studio and 1 bed 2 person dwellings and no 4 bed dwellings tested at all, not even for Social Rented homes. This is very concerning and does not provide sufficient diversity in the housing stock to accommodate different demographics across London's multicultural population, such as areas which have higher proportions of cultures with multigenerational living. This also does not meet the NPPF requirements which require policies to promote mixed and balanced communities. This direction would not be very relevant to boroughs such as Richmond where the focus is on the provision of a larger number of family sized dwellings. In addition, it would not be relevant for schemes on greenbelt for example, as its likely in these areas the composition of the site would include more family sized dwellings, therefore, the Council would expect the mixes tested to slightly change as a result of the location. We would strongly recommend some sensitivity testing is undertaken to assess the viability implications of different housing mixes, including a greater proportion of family-sized homes, on sites such as greenbelt developments.
- The Council is concerned that the GLA has not tested any of the major C3 for sale residential typologies at 25% social rented housing in value bands B, C and D. Considering Table 3.2 in Policy

HN3 allows developments in Location band A to provide 25% social rented instead of the 35% affordable housing, which is essentially a simplified version of the equivalency principle, the Council would expect this option to have been tested thoroughly to assess if 25% with all provided as Social Rent is the maximum which can be viably provided on major residential schemes in value bands B, C and D.

- In regard to the PBSA typologies tested, no larger schemes have been tested with onsite C3 affordable housing. We would also want to confirm if this has been tested on the basis of floorspace or by habitable room to ensure its consistency with the draft London Plan. It makes relatively little sense that only the smallest typology PBSA_2_B for 470 units has been tested for 35% onsite affordable housing units. This is equally relevant for PBSA typologies in Value Band C. The larger PBSA typologies (PBSA_1_C, PBSA_3_C) should be tested with 35% onsite C3 affordable housing.

Value Areas

- The GLA has proposed *"three different affordable housing threshold locations which take account of the spatial difference in viability across London"*. The structure of the LPVS is based on the GLA's assessment of viability across a series of concentric value bands which reflect the pattern of open market sales values for new-build development across London.
    - Richmond is included within Locational Band A, which proposes a 35% affordable housing threshold.
- The viability testing of residential development typologies has been conducted in **six** value band areas across London to account for spatial variance in sales values across London.
    - Broadly the Council agree with this approach and agree that an additional value band area is included in this LPVS when compared to the previous LPVS which had five value bands.
- Annex 2 sets out the methodology used to derive residential sales values and establish the Value Band framework applied within the London Plan Viability Study (LPVS). The approach is based on analysis of observed new build residential transactions across London between June 2022 and June 2025.
    - The Council consider that just using new build data alone does not provide a balanced view of the housing market. The property market in Richmond is predominantly second-hand residential stock, with a wide range of older conversion and purpose-built mansion flats along with significant numbers of older period houses. New builds are historically lower in Richmond, due to the many constraints in the borough. Therefore, the study which just records data from new build transactions will not reflect the market values across the varied submarket areas of Richmond.
- Sales data sourced from the Land Registry was combined with Energy Performance Certificate (EPC) data to derive consistent sales values per square metre across Greater London.
    - The Council agree that this is a reasonable methodology to source GIA data, as this is not provided within Land Registry Data. However, the Council would recommend that the GIA data on the EPC data is cross checked with sales particulars, available on platforms such as

Rightmove, and Molior. It is not clear from the information provided in Annex 2 how the data has been cross checked to ensure that the GIA for the properties are correct.

- Average sales values were calculated at postcode district level and grouped into six Value Bands. The resulting Value Bands provide a framework for representing variation in residential sales values across London. These bands are then categorised into a set of representative sales values by unit type, which are applied as inputs within the LPVA.
    - The Council considers that these values are not potentially fully reflective of the areas' housing market as the values tested do not include second hand properties, which make up the majority of the market in Richmond.
- Sales Value Data Price paid data for all new build transactions in London from June 2022 to June 2025 was obtained from the Land Registry website in July 2025. The dataset includes key details such as paid price, property addresses, postcodes, boroughs, and transaction dates. New build transactions were sourced from the Land Registry's price paid data platform. The dataset search resulted in approximately 21,300 transaction records, and was acquired by applying the following filters: a. District: London borough name(s). b. Sale date range: June 2022 to June 2025. c. Property types: Detached, Semi Detached, Terraced, Flat/Maisonette. d. Transaction type: New build only.
- While the 2017 London Plan Viability Study (Dec 2017) used a two-year timeframe, a three-year period was selected for this analysis to ensure a more robust dataset. This extended timeframe helps mitigate the impact of reduced transaction volumes observed during 2024 and 2025 due to broader macroeconomic conditions, thereby avoiding an unrepresentatively small sample size.
    - The Council agree that consideration of transactions over the three-year period will assist in balancing out the reduced level of transactions in the years 2024 and 2025.
- Floor area data for all new build dwellings in London inspected for an Energy Performance Certificate (EPC) between 2022 and 2025 was manually downloaded from the EPC platform.
    - The Council note that whilst this is a simple way to amalgamate a large number of floor areas, it should be considered that this should also be cross checked with sales data available for robust analysis to be undertaken.
- EPC measurements are based on Net Internal Area (NIA), while all values and cost assumptions used for viability testing in this report are based on Gross Internal Area (GIA), as defined by RICS. Although the difference between NIA and GIA can be significant in commercial settings, for residential dwellings the variation is minimal, allowing NIA to be treated as a reasonable proxy for GIA in this analysis.
    - The Council considers that further clarification is required with respect to the area definition for flats. Does the GIA take into account the communal areas for flats – this would be the interpretation based on this statement? We consider that this point requires further clarification.
- Combining the Data - An algorithm was developed to match records between the Land Registry and EPC datasets. This algorithm generated a matching code based on a combination of postcode, sales price, and sales date. Approximately 18,900 new build sales in London from 2022 to 2025 were successfully matched with EPC data. This represents an 88% successful matching rate,

indicating the algorithm was able to accurately pair the majority of recorded new build completions with corresponding floor area information during this period. Unmatched data arose for several reasons, including: a. Sales from schemes with fewer than 20 units b. Variations in address formatting. c. Obvious data entry errors. d. All unmatched data was removed from the data set. To improve the quality of the matched dataset, the top and bottom 0.5% of records, based on price per square metre (approximately 190 entries), were removed as outliers. These records displayed extreme values in either sale price or floor area, making them unsuitable for reliable analysis.

    - The council reiterates the limited nature of the newbuild data only. However, given the data combinations appear to exclude the sales of units with under 20 dwellings (the threshold for inclusion in the Molior database), this will exclude many potential schemes within Richmond as a significant proportion of the housing stock is from small sites.

- The matched dataset was transformed to calculate average sales values for each postcode 'district'. In total, 163 out of approximately 270 London districts contained usable sales data. Districts without data was often due to several reasons, including a. A lack of residential development (e.g. areas dominated by parks, open space or other non-developable land uses); and b. Established suburban areas with limited new build activity. The final data set contained data that ranged from approx. £2,000 per sqm to approx. £45,000 per sqm.

    - As only new build sales values have been used, it is clear from the mapped data that there are significant gaps where there is no data relied upon. This is especially relevant in Richmond, where a significant proportion of the borough includes no data at all. The Council appreciates that these reasons might begin to explain why 40% of the Greater London area is not represented with any sales data. However, the Council considers that further analysis should be undertaken to ensure that the various housing markets are represented and ensure a greater robustness within the housing market analysis. Given that London Plan policy does not just relate to new build units and will also relate to conversions etc it seems inappropriate to remove all secondary sales data. We would recommend that some second-hand property transactions should also be analysed.

- The full dataset was then grouped into six 'Value Bands' using a combined weighted statistical range method. This approach involved the following steps: a. The data was first classified using the Jenks Natural Breaks method; b. The dataset was then separately classified using the Equal Distribution method; c. Final statistical range breaks were calculated as the midpoint between the corresponding break points of the Jenks and Equal Distribution methods; d. This blended approach was selected as it produced a more logical spatial distribution of value bands. It balanced the statistical grouping logic of Jenks with the spatial evenness of an Equal Distribution method, resulting in a more practical banding system. Six bands were chosen to provide sufficient granularity for identifying market variation for the purposes of development viability testing. This represents a change from the 2017 methodology, which used five value bands. The additional band allows for more nuanced differentiation across London's housing market.

    - The Council considers that an additional band is an improvement from the previous 2017 report, however, given the complexity of different market ranges across Richmond, this is potentially not sufficient to genuinely reflect the range of market values across borough and therefore maximise viability.

- The upper and lower limits of the Value Bands (£2,142 and £41,969) simply reflect the highest and lowest postcode district averages in the dataset. These thresholds are not statistically significant and serve only to define the fully observed range.
- The aggregated district data was then classified according to the defined value bands. This data was joined to spatial postcode district boundaries and imported into a GIS platform to visualise the geographic distribution of value bands across London. The map below shows the average sales values by £ per sqm for each postcode district:
    - According to the mapping, the Council note that Values in Band D are found in Teddington, and Values in Band E are found in Twickenham, St Margarets, Richmond, North Sheen and Kew. In the study, value band D is from £8,525 per sq m to £10,877 per sq m and Value Band E is £6,442 per sq m to £8,525. We consider that market values can generally exceed these ranges in these areas within the borough, when considering small site new build and second-hand sales values.
    - Likewise, whilst the Council appreciate large areas attributed to Richmond Park and Bushy Park make up some of the area where there is no sales value data is attributed, there are more areas of Richmond where no sales value data is attributed, such as Hampton, Hampton Hill, Strawberry Hill, Whitton, Ham, Petersham, East Sheen and Mortlake. The Council's concern this is that the value bands are not fully reflective of the market values across the range of areas within Richmond, and not reflective of the types of properties which make up the housing market overall.

<u>Values for Social Rent (Annex 4)</u>

- Social rents are calculated on a formula basis as outlined in the Rent Standard published by the Regulator of Social Housing. The latest version was published in February 2026 and has come into effect from 1 April 2026. Rents may increase by up to CPI +1% each year.
    - This assumption is as the Council would expect in terms of social rent appraisal assumptions.
- DCF Cashflow assumptions Rent Inflation 3% until 2036 2.5% thereafter; Cost Inflation 2.5%; Discount Rate 5%; Management Cost (per unit) £600; Maintenance Cost (per unit) £700; Major Repairs 0.8% of £2,310/sqm rebuild cost commencing in year 6; Voids 2%; Bad Debts 1%.
    - These assumptions are as the Council would expect in terms of social rent appraisal inputs. However, the Council note that the actual values are not clarified.

<u>Values for Key Worker Living Rent (Annex 4)</u>

- Key Worker Living Rent was introduced by the Mayor through the Planning and Housing Practice Note published in January 2026 as a new intermediate housing product. Key Worker Living Rent homes are specially designed to support middle-income Londoners, especially key workers, with household incomes up to £75,000. The GLA has published benchmark rents for Key Worker Living Rent homes by number of bedrooms and borough for 2026 and will update these annually. They represent the maximum monthly rent chargeable in each borough including service charges. These benchmarks are based on 40 per cent of the average net income of London's key worker households and are adjusted to reflect borough-level market rents and property size. The monthly benchmark

rates are capped at £1,750 for 2026-27. Assumptions for weekly rents are informed by the published benchmark rates, with estimated service charges deducted. These range from £194 for a 1 bedroom 2 person dwelling in Band F to £344 for a 3-bedroom 6 person dwelling in Band A. These assumptions reflect current benchmarks applied by the GLA.

- DCF Cashflow assumptions Rent Inflation 3% until 2036 2.5% thereafter; Cost Inflation 2.5%; Discount Rate 5.5%; Management Cost (per unit) £600; Maintenance Cost (per unit) £700; Major Repairs 0.8% of £2,310/sqm rebuild cost commencing in year 6; Voids 2%; Bad Debts 1%.
    - These assumptions are as the Council would expect in terms of social rent appraisal inputs. However, the Council note that the actual values are not clarified.

Values for London Shared Ownership (Annex 4)

- Shared ownership is an intermediate affordable housing product that allows a home buyer to purchase a share of a new home, and pay rent on the remaining, unsold share. Shared owners may subsequently buy further shares in their homes in the process known as 'staircasing'. As per the 21st London Plan Annual Monitoring Report published in January 2026, the maximum household income threshold to access Shared Ownership homes remains set at £90,000. Housing costs for shared ownership homes, including service charges, are capped at 40 per cent of the maximum household income threshold of £90,000.
- DCF Cashflow assumptions Rent Inflation 3% until 2036 2.5% thereafter; Cost Inflation 2.5%; Discount Rate 5.5%; Management Cost (per unit) £150; Maintenance Cost (per unit) £500 (first 10 years only); Major Repairs n/a; Voids 0%; Bad Debts 0.5%, Staircasing 50% years 5 - 25.
    - These assumptions are as the Council would expect in terms of social rent appraisal inputs. However, the Council note that the actual values are not clarified.

Benchmark Land Value

- Within the London Viability assessment there are 3 key Benchmark Land Values applied. The background on how these have been derived are included within Annex 5.
- Within Annex 5 the main existing land uses include examples such as Petrol filling stations, social infrastructure, office & residential use, food store and residential use, industrial open storage, Class E Use among others. The use types of the existing uses are linked with the most common types of re-development, i.e. major residential typologies are directly linked with existing use values including Supermarkets, car parking, industrial & open storage, this appears on the face of it to be a sensible approach as of course smaller vacant garage site existing uses would not generally accommodate major residential development and therefore would be unlikely to yield realistic and useful results.
- It is however, unclear within the London Viability study, how the different existing uses have been transferred into the final 3 Benchmark Land Values, the Council recommend further clarification is provided as part of any phase 2 study.
- Secondly, it is not fully clear where the values for the existing uses have been derived from, for example where has the value of £120,000 been derived from in relation to vacant garages in band D, or the value of £3,150,000 for a small super supermarket? There needs to be greater transparency as to where these figures have been derived from, how can it be ensured that hope value is not included within the valuation, as required by the PPG. This evidence is necessary to ensure the EUV's applied are accurate and represent realistic returns achieved on the existing uses of these

types of sites. Without this evidence it is difficult to fully justify the EUV's applied for the difference uses are PPG complaint.

- Further to the existing use values applied, the Council are also very concerned regarding the application of the 20% premium, there seems little logic to the inclusion of some of premiums applied. For example, a premium of 20% has been applied to sites such as Vacant Plot/garages, car wash/MOT garage, open storage, Industrial units etc. Within the PPG the premium must be applied on the basis that it provides a clear incentive to release a site, a higher premium is generally attributed to sites which make a suitable return for the landowner within their existing use, and therefore would require a higher premium to incentivise the landowner to release the land. This would not be the case for sites such as those listed above as they would be very unlikely to be making a large enough return to need to significant incentivise the landowner to release of the land, the Council strongly recommend that either no premium or a minimum premium is applied to sites correctly as per the PPG requirements and would recommend the GLA review their use of the premium within the study and ensure it reflects the PPG. This is an important point as applicants going forwards will use this applicant of premium as part of site-specific viability assessments and therefore it is vital it reflects the approach taken within the PPG, which currently it does not.
- Overall, there is a real lack of transparency of how the values and levels of premium have been determined. Considering the BLV is a key element of the viability testing it is vital that further evidence is provided in relation to how each of EUV's has been determined for each value band.

Thresholds and Tenure

- Richmond is included within band A which includes an affordable housing threshold of 35%, on the basis of a 60:40 tenure split.
- There is however concern that the conclusion of the viability testing do not fully explore the use of the equivalency principle, i.e. very few typologies have been tested on the basis of 25% of the affordable homes being delivered as Social Rent, or that 40% affordable housing on public land is the optimum in place of the previous threshold at 50%. We are therefore concerned that the testing does not fully explore all the thresholds included within the draft London Plan and evidence why these are set at these levels.
- It is also a concern that as part of Green Belt testing the tenure split has been included on the basis of 50:50 Social Rented to intermediate tenure. Given that the London Plan is seeking to apply a tenure split of 60:40, as a minimum, it seems counterintuitive to include a 50:50 tenure split to Greenbelt land which is meant to be maximising benefits to the community, which a key benefit is the delivery of Social Rented housing which is desperately needed. There also does not appear to be a clear reason as to why a 50:50 split been informed by initial viability testing, or is there another policy reasoning for this difference in tenure split applied within greenbelt development.
- One of the key takeaways from the study is that the 35% threshold is supported by grant funding and moderations to borough CIL based on the support for housebuilding measures. At present although there is a recommendation within the support for housebuilding LPG that charging schedules are reviewed, there is no mandatory requirement for Councils review CIL charging schedules. Until this is mandatory it is highly unlikely these will be updated.
- The testing has been carried out on the basis of different intermediate affordable housing tenures, including Key Worker Living Rent and Shared Ownership which is welcomed to give a balanced view of the policy requirements.

- It is welcomed that the growth assumptions applied to the affordable homes have been set out. One of the aspects the Council have found when viability testing London Living Rents against KWLR, that in the short term LLR is more viable, however, in the longer term KWLR is more viable. Given that many RP's are still looking to provide LLR and LLR remains a suitable intermediate tenure the Council would recommend this tenure is also considered within the testing, even if it is only a sensitivity test to understand the viability implications between LLR and KWLR in relation to policy aspirations within the draft London Plan.
- We also welcome that for each test, sensitivity testing regarding construction costs and gross sales has been included, this again provides a balanced approach given the longevity of the London Plan.

Build to Rent, Student and Co-living

Student accommodation

- The findings within the London Viability Assessment demonstrate that the; "strongest viability profiles in Value *Bands B and C, and can be used to viably support the delivery of 35% onsite C3 Use affordable housing in these locations."* This is positive and welcomed by the Council as will help spread onsite affordable housing delivery across a larger number of tenures to maximise affordable housing delivery.

Build to Rent

- We are concerned that the direction taken on BtR does not reflect the current market in BtR which is very strong. A recent Savills report stated; "More than £900 million was invested in UK Build to Rent (BTR) in Q3 2026, taking year-to-date volumes to approximately **£4.2 billion, the highest level recorded at this point in any year".** The findings within the London Viability Assessment are a very narrow interpretation of the current market surrounding BtR. As a result of the Renters Rights Bill, many smaller landlords are leaving the market, meaning larger schemes of BtR are filling this void and demand remains high. We know that yields are still strong in the BtR and there needs to be more reference to the difference between Open Market homes and BtR, including the lower level of risk associated with BtR and the higher absorption rates of BTR compared to Open Market housing continue to make this a popular tenure to deliver especially within inner London.
- Overall there needs to be a change in how BtR is modelled from a viability perspective, the Council know for example that substantial amounts of investment are still coming to BtR, yet applying a standard open market approach to the testing always results in BtR seemly looking less viable than Open Market housing, which given the direction of investment in the sector is not the case in reality. It is absolutely imperative that models which show realistic levels of rent growth over time are modelled as part of the testing. This is a key reason why investment is coming to BtR as within many rental agreements for BtR rent increases are included as standard, but the extant of this is not factored in within tested, moreover there will be areas of higher demand which will most likely see higher levels of rent increases. A new way of properly capturing the true viability picture of BtR is much needed to ensure the level of affordable housing is reflecting in a realistic way as part of the London Viability study. Currently based on the differences between the Savills conclusion of BtR and the GLA's version do not currently align, and based on Savills experience in the sector showing market growth, versus the GLA's position that shows there are viability challenges associated with BtR there is a clear underestimation of the true value of BtR as part of the current testing.

- Overall, the London Viability study seeks to promote tenure diversification on sites to improve viability, if this is the approach being sought by the GLA London Plan policies and associated guidance will need to be better at coping with mixed tenure sites (as mentioned above). At the moment it is challenging to calculate affordable housing thresholds across diverse mixed sites to ensure policy compliance. We would also strongly recommend that some live examples of mixed tenure sites, with Co-living, PBSA, C3 and employment floorspace are modelled to show the extent viability is improved as part of mixed tenure sites.
- There is also no reference to the current yields and wider assumptions applied to BtR. This is not the case for co-living and PBSA which both include a more detailed breakdown of the assumptions applied to the GDV. We would recommend that BtR also includes this level of detail to ensure transparency.

Co-living

- Within the viability testing co-living remains a highly viable product. We are however unsure the size of room on average which has been tested within the Co-living typologies (or PBSA typologies). Generally, the Council see a collection of different sized rooms proposed within Co-living proposal but even reducing the average size of room by 0.5m2 would significantly change the viability as part of a large co-living proposal, the Council recommend the GLA includes live examples of co-living schemes to demonstrate they have based their assumptions on realistic examples. For reference, the GLA's guidance on Large Scale Shared Living proposals states; "the units should be suitably sized to accommodate the amenities listed in table 3.5, below, for sleeping, eating, working, relaxing and storage. They should be no less than18 sqm, and no more than 27 sqm". We would strongly recommend the co-living appraisal assumptions in regard to the room sizes applied are provided in a more transparent way to ensure the testing reflects a realistic mix of unit sizes.
- It is also unclear if the yields applied to co-living and PBSA have been included on the basis of transaction data or evidence within viability assessment. Further clarity should be provided on where these have been derived from.

Small Sites

- In regard to small sites, between 10-35 dwellings the London Viability study states that generally development typologies are viable at 35% and 20% in value bands A, B and C, with only bands D and E struggling to meet this level. We are therefore unsure as to why the level of affordable housing has been set at 20% across all smaller sites if it is only band D and below which are showing viability challenges.
- The viability study also states that "*The Draft London Plan sets a lower 20% affordable housing threshold for these developments, compared with the current plan taking account of viability challenges and with the intention of supporting smaller and medium sized developers, whilst also recognising that in practice these types of development can make an important contribution towards the delivery of affordable housing*". These points are contradictory as if a 20% threshold is applied, smaller developments are highly unlikely to deliver affordable homes onsite, therefore are highly unlikely to make an important contribution to affordable housing. For example, 35 units equates to only 7 affordable homes units at 20% affordable housing, this is very unlikely to interest the majority of RP's. If it was instead 35% this would be 12 units, which would be far more likely to

be secured by an RP with onsite delivery. Of course, as the number of units gets less this will be compounded.

- In addition, smaller/medium sites generally have far fewer infrastructure costs or requirements associated with them, meaning they are often more viable than very large sites which generally have significant infrastructure, open space and community requirements associated with them. It is a significant concern if the majority of medium sites switch to off-site contributions due to the lower affordable threshold and therefore less demand from RP's. Especially in Richmond, medium sized sites provide a vital contribution to onsite affordable housing, especially given the time lag between receiving contributions and being able to spend them on delivering affordable homes. We are highly concerned that the approach within the draft London Plan is not supported by the conclusions within the London Viability study, given that 35% still can be achieved within bands A-C.

Height

- Within the London Viability study there is a clear correlation between height and viability. This is also something the Council see as part of onsite negotiations and the fall off in viability as soon as a second stair core is required. The concern is the relationship between maximising housing numbers and the wider viability implications of building higher. It is positive that the London Viability study is actively considering higher levels of grant in higher rise developments to try and counteract this.
- It is also welcomed that different external allowances are made in relation to the height of the buildings with only greenbelt development including the largest allowance of 15% of total base build costs for externals to take into account the larger areas of tarmac, whilst higher rise development includes an allowance of 3-5% for high rise blocks which is reasonable.

Grant

- Within the assumptions of the London Plan Viability assessment the following have been attributed to grant:
  - "Social Rent Grant rate per unit £220,000
  - London Shared Ownership £70,000
  - Intermediate Rent (where rents are above London Living Rent benchmarks) £90,000
  - Key Worker Living Rent (or intermediate rent where rents are at or below London Living Rent benchmarks) £140,000
  - In all cases, 10% of all units are assumed to be nil grant, with the remaining affordable housing units being counted as eligible for receiving grant funding.
- Grant funding has been profiled in appraisal cashflows on the basis of the first tranche of grant funding (75%) being received at the start of construction, and the remaining 25% being received at the end of the construction period".
- This appears reasonable, however, given the funding is oversubscribed is it realistic to assume that all major schemes will be able to access some level of grant. Equally as the Council understand it, the accelerated funding route is only open to schemes of more than 30/40 dwellings, therefore it may be unrealistic to apply this level of funding to all major residential schemes. Further clarity on this is required.
- We would also recommend some level of growth is applied to grant rates, as the grant rates have substantially increased over the past 5 years and it would be useful to model this as part of the viability study to demonstrate this in a realistic way.

Additional Costs

- The standardised costs including contingency, professional fees assumptions all align with industry norms and appear reasonable. It may be prudent to apply a staggered professional fee based on the site size/site complexity, however this is unlikely to result in the difference between an unviable site becoming viable. We would, however, question the need for contingency and abnormal costings to be included as separate percentages, as generally contingency is applied to account for unforeseen/abnormal costs. We question the need for both to be applied individually.
- The finance rate of 7% appears reasonable and as this has been applied on the basis of a 100% debt financing this will allow for some cases where finance costs are slightly higher as generally banks will not in reality loan on the basis of 100% debt, this point should be made within the study.
- It is concerning however, how some additional costs have been assessed within the London Viability Assessment which do not currently reflect policy approaches, for example crediting the costs of off-site SuDS contributions against borough CIL liability through a CIL in-kind approach.
- How SuDS are provided onsite is generally to mitigate the development itself, and using this to offset CIL liability would not be considered appropriate as it would not be considered as a community benefit. We are concerned that this approach has been applied and would recommend this approach is revised within any phase 2 testing.

Profit

- We welcome the different levels of profit which have been attributed across the different site types and this is reflective of the level of risk associated. We welcome the profit levels attached to smaller developments as the Council agree these do often carry far less risk than very large schemes. We would however recommend that additional clarity is provided in relation to the larger and high rise schemes, i.e is the higher profit level only attributed to the higher elements of the site, or the entire site. This would be a very welcome clarification to ensure profit levels across larger sites do not start to creep back up again, after the Council have managed to hold the line on 17.5% for some time which has been very much needed to cope with other challenges in the development industry at present.

Table 10 – Adopted developer profit assumptions

Development Type	Developer Profit Allowance (% of GDV)
BfS Market Housing (1-10 units)	15%
BfS Market Housing (11 units or more)	17.5%
BfS Market Housing (30-storeys and above)	18.5%
Affordable Housing	6%
Build to Rent (BTR)	15%
PBSA & PBSL	15%
Commercial/Non-residential uses	15%

Other assumptions

- The Council questions the validity of the following:

  "An assumption of 60% off-plan sales and a post practical completion sales rate of 6 units per month have been adopted for large major residential development typologies in Value Bands B

and C, echoing GLA analysis that sales rates have been stronger in those locations for larger higher density schemes. An assumption of 50% off-plan sales and a post practical completion sales rate of 4 units per month have been adopted for major residential development typologies in value bands D, E and F. These assumptions have been informed by off-plan and post practical completion sales rates adopted in recent site-specific and area-wide viability assessments reviewed by GLA officers".

- From working with developers regularly it is clear that off plan sales are far lower than in previous years and sales periods are lower than those assumed within the London Plan Viability study. Of course this trend is unlikely to continue for the whole of the Local Plan period, however the Council would recommend if these assumptions are going to be applied, sufficient evidence is provided to support this. It may be prudent to sensitivity test a lower off plan sales figure and slower sales period to account for shorter term challenges and ensure that the London Viability study is reflective of the current market conditions.

Conclusion

Overall, there is a significant amount of information within the London Plan viability study, however, the Council have not found this very easy to interpret or follow. Given there is over 500 pages within the annex's in addition to nearly 200 pages of the study it's self, the Council do not believe enough time has been given the fully analyse the results. We would recommend the phase 2 report includes greater transparency relating to the background information, clearer reasoning for why the testing has been done as it has and better dialogue provided to set out the reasoning for the final thresholds included in the draft London Plan.

Within the LPVA it does set out that stakeholder engagement has occurred, however, there is no evidence provided within the study to show what responses where received and how this was carried out. In addition, I cannot see evidence that boroughs have been directly engaged as part of this process which is disappointing considering our knowledge and expertise from a borough level.

Appendix 3 – Comments on the Sustainable Access Measure (SAM) & Methodology Summary Report

- The Council welcomes the opportunity to comment on the new Sustainable Access Measure (SAM) and the methodology summary report published alongside the draft London Plan consultation.
- The Council notes that the methodology summary report indicates that TfL intends to continue refining and enhancing SAM through consideration of consultation responses and ongoing internal review. Given the important role that SAM already plays in informing a range of policy approaches within the draft London Plan, and ultimately borough housing targets via the Strategic Housing Land Availability Assessment (SHLAA), the Council is concerned that aspects of the measure remain under development. This raises concerns regarding the robustness of a measure that remains subject to ongoing refinement, yet is already being relied upon to support consequential strategic planning policies.

Application of SAM in the draft London Plan

- The Council notes that SAM has been incorporated into the following policy areas within the draft London Plan:

- *Policy MBUL2: Optimising the use of land and site capacity,* including forming a key component of the Optimisation Framework.
- *Policy MBUL3: Tall Buildings*, including Box MBUL3 (Tall Building Location Criteria), where areas with a SAM score of 4 are "generally assumed" to benefit from very good sustainable transport connectivity.
- *Policy GHR11: Cycle and car parking* – maximum car parking spaces for various types of development
- *Policy PV5: Industrial land supporting housing growth*, where a SAM score of 4 is used as an initial criterion for identifying industrial land that may be suitable for release for residential development.

- Comments regarding the application of SAM within the above policies are also set out in the Council's detailed responses to the relevant policies.

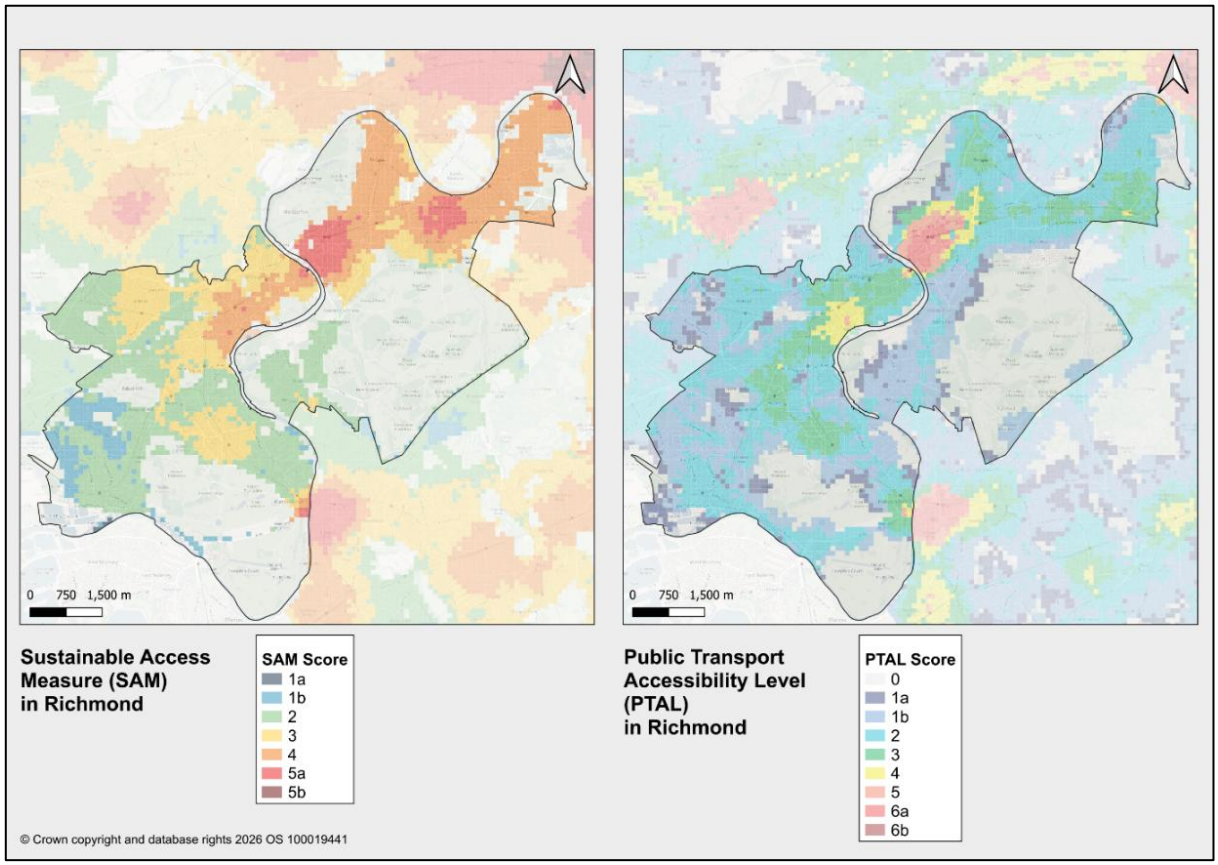
Comparison with Public Transport Accessibility Level (PTAL)

- The Council recognises that SAM and PTAL are designed to measure different aspects of connectivity and therefore *could* serve complementary functions. SAM provides a London-wide measure of access to jobs, services and other destinations through end-to-end journeys by sustainable modes, whereas PTAL measures access to the public transport network itself, based principally on walk and wait times.
- The Council recognises the potential benefits of SAM as a broader measure of sustainable accessibility, particularly its ability to better capture whole journey times and access to destinations. However, PTAL could continue to provide important benefits, including a well-established and widely understood methodology and a more localised picture of public transport access. Compared to SAM, PTAL as a local comparator can provide more useful insight into variations in public transport access across individual sites and local areas.
- The Council notes that both the methodology summary report and the draft London Plan describe SAM as a measure intended to complement, rather than replace, PTAL. However, whilst SAM is embedded across a range of significant policy areas, including relating to housing targets, development density, industrial land policy and car parking standards, references to PTAL within the draft Plan are extremely limited and do not form part of any policy requirements. The Council therefore considers that greater clarity is needed regarding the intended ongoing role of PTAL, either within the London Plan itself or through future supporting guidance, to ensure a consistent understanding and application of both measures across London and to clearly establish where PTAL is expected to continue to inform planning judgments alongside SAM.
- The Council notes that, because SAM and PTAL measure different aspects of connectivity, they can produce markedly different outcomes for the same location. The Council would therefore welcome further guidance on how decision-makers should approach situations where SAM and PTAL indicate significantly different levels of connectivity, particularly given the substantial policy weight attached to SAM within the draft London Plan. For example, in Richmond there are many parts of the borough (particularly in the east) currently identified as PTAL 0-2, indicating relatively poor public transport accessibility, are now identified as SAM 4 or 5, suggesting very high levels of connectivity.

SAM in Richmond

- Map 1 shows SAM and PTAL in Richmond. It is notable that parts of eastern Richmond, including East Sheen, Barnes and Kew, appear to perform much more strongly under SAM than under PTAL. This is particularly notable given the significant transport impacts associated with the long-running closure of Hammersmith Bridge. By contrast, under PTAL the borough's strongest-performing areas are concentrated around Richmond and Twickenham town centres.
- Furthermore, there are many areas of the borough where connectivity on the ground is not as strong as SAM may suggest at face value. While PTAL recognises some of these local variations, SAM can mask important differences in accessibility at a more localised level.
- The Council would therefore welcome reassurance that the methodology is sufficiently responsive both to local variations in connectivity and to significant transport network disruptions, so that accessibility challenges experienced by local communities are appropriately reflected in SAM scores.
- While the Council's concerns regarding the proposed Optimisation Framework are set out in response to Policy MBUL2, the Council is also concerned that SAM, as a component of the proposed Optimisation Framework, may lead to assumptions regarding development density and building heights that are more typical of Inner London locations. This risks overstating development capacity in areas where the existing urban form, suburban character, heritage assets and associated conservation constraints, and infrastructure constraints, which can restrict the delivery of higher-density forms of development.

Map 1 – SAM vs PTAL in Richmond



Weighting of the SAM components

- The Council notes that SAM combines three separate catchments into a single score: city-wide public transport access to employment within 60 minutes (43% weighting), walking access to destinations within 10 minutes (41% weighting) and other public transport access to destinations within 30 minutes (16% weighting).
- The Council does not have any detailed comments on the specific weightings attributed to each component. However, it notes that the relative weightings are derived from regression analysis based on the relationship between each layer and levels of car ownership, with additional controls applied for a range of socioeconomic and demographic variables. Additionally, the Council notes that the combined weighting attributed to the two public transport catchments (59%) appears to mask significant local variation in connectivity that is more evident within the walking catchment, potentially limiting the measure's ability to distinguish between areas such as town centres and surrounding suburban residential neighbourhoods.
- The Council would welcome further explanation of this aspect of the methodology, presented in a manner that is more accessible to non-technical users.

SAM banding

- The Council notes that SAM bands are derived from London-wide quintiles, with each principal band representing approximately 20 per cent of Greater London's area (with the highest and lowest bands further subdivided into 5A/5B and 1A/1B). While the Council recognises the rationale for producing a consistent London-wide comparator, this approach can limit the level of differentiation observable within individual boroughs. The methodology therefore appears more effective at identifying broad differences between locations across London than at distinguishing variations in accessibility within some boroughs.
- The Council would therefore welcome further explanation as to whether alternative approaches were tested, including the introduction of additional bands, refinement of the upper bands, or amendments to the weighting applied to the three accessibility measures, to improve local resolution in areas where accessibility levels are generally high.

Cycling

- The Council notes that cycling has not been incorporated into SAM and welcomes the aspiration to do so in future iterations. However, its exclusion is a limitation of the current measure and may understate accessibility in locations where high-quality cycling infrastructure exists or is planned. While the Council recognises the technical challenges of incorporating cycling into SAM, the current approach does not reflect the accessibility benefits of existing and planned cycling infrastructure, meaning SAM may not fully capture sustainable accessibility and growth potential.
- The Council welcomes the proposal for a "cycling-on" version of SAM. If developed, consideration should be given to referencing it within the next London Plan and relevant guidance to support its consistent application across London.

Accessibility and step-free access

- The Council welcomes the intention to explore accessibility metrics, including the potential development of a step-free version of SAM. The Council is disappointed that such metrics have not

already been developed and incorporated within the initial version of SAM. This could provide an opportunity to develop a more comprehensive understanding of sustainable access for a wider range of users than is currently possible through PTAL, whilst helping to ensure that accessibility considerations are more transparently reflected in planning and policy decisions.

Walk quality

- The Council notes that SAM currently measures movement distance along the walking network but does not account for factors that may materially influence the quality and attractiveness of walking routes, including crossing delays, traffic conditions and topography, which can be important considerations in parts of the borough. Whilst the Council recognises there may be computational challenges associated with incorporating these factors (however, the Council considers that every reasonable effort should be made to address any such challenges given the importance attached to SAM within the next London Plan), their omission means that SAM may not fully reflect the practical experience of walking journeys and accessing public transport in different locations. This is particularly relevant given that the walking catchment accounts for approximately 41% of the overall SAM weighting, making it a significant component of the final score. The Council therefore welcomes the commitment to exploring these matters as part of the future development of SAM.

SAM and time of day

- The Council notes that the methodology summary report does not specify the time period upon which SAM is based. The Council understands from a TfL SAM online engagement event (10th September 2026) that the measure reflects morning peak travel conditions, however this should be clarified within the methodology summary report to provide greater transparency.
- The Council also considers that consideration should be given to the development of a night-time version of SAM which reflects the availability of night-time public transport services and other factors that can influence the accessibility and usability of sustainable travel options during the evening and night-time period, such as the availability of safe walking routes and street lighting. This could provide a more comprehensive understanding of connectivity at different times of day and support wider objectives relating to personal safety, including for groups such as women and girls, as well as accessibility of London's night-time economy.

Open Data

- The Council welcomes the publication of the accompanying SAM GIS data and encourages TfL to maintain an open-data approach wherever practicable. The emergence of a number of third-party analytical tools exploring SAM during the draft London Plan consultation period demonstrates how wider access to data can support innovation, transparency and independent scrutiny.
- The Council would strongly encourage the development of an interactive online tool at the earliest opportunity, similar to WebCAT, to support the application of SAM. This should enable users to understand site-specific SAM scores and interrogate the performance of specific locations against each of the three underlying components of the measure. Such a tool would improve transparency, accessibility and understanding of SAM for a wide range of users, including planning authorities, applicants and importantly members of the public

Selection of data

- The Council notes that SAM draws on a very wide range of destination datasets, particularly the circa 200 Points of Interest (POI) categories listed in Appendix 3 of the methodology report, which have been selected from a much larger dataset of over 500 categories. The Council notes that some POI classes included within the dataset are highly specialised and have very limited (or no) provision across London itself (e.g. paragliding and hang-gliding facilities, diving schools and sailing schools). Further justification would be helpful as to why such categories were included and what influence they have on the overall measure, given that they are unlikely to form part of the regular travel patterns of most Londoners. While the methodology explains how selected destinations are grouped and weighted, greater clarity is needed regarding the rationale for including particular destination types and excluding others. The Council would also welcome sensitivity testing demonstrating the extent to which SAM scores would change if specific destination categories were added, removed or differently grouped. This would help provide confidence that the measure is robust and not unduly influenced by the choice of inputs.

Appendix 4 – Comments on the Habitats Regulations Assessment & Integrated Impact Assessment

Habitats Regulations Assessment

It is noted that the HRA of the draft Plan (AECOM, July 2026)[43] considered during appropriate assessment the potential impact pathways of recreational activity and urbanisation, air pollution, and water resources (quality and quantity). We will leave it to Natural England and other statutory bodies to provide further detailed comments on the HRA, although the Council note the pathways identified reflect those in the most recent HRA work undertaken to inform the Richmond upon Thames Local Plan.

The reference to the Richmond upon Thames: Regulation 19 Local Plan Habitat Regulations Assessment is noted, which the Council assume reviewed the latest version dated June 2024, which included an update on air quality in relation to Richmond Park SAC following discussion with Natural England. While this provides useful context in terms of the Richmond Park SAC, as noted at paragraph 7.2.4 in the HRA of the Draft Plan, it was focused on the impacts of the Richmond upon Thames Local Plan in combination with other plans and projects identified at that point in time. There is a need for clarification that recreational pressures from a wider area based on the emerging London Plan and other plans and projects have been fully considered. In particular, it is not clear from the HRA how the potential effects of London -wide growth on visitor numbers and recreational use of Richmond Park have been assessed, beyond reliance on conclusions previously reached through borough-level HRA work. In terms of Wimbledon Common SAC, it is noted that the HRA concludes that the Draft Plan will not result in a negative effect through the air-quality impact pathway on Wimbledon Common SAC, however additional air-quality modelling is also being conducted for this SAC, to inform the local authority plan-making process and the HRAs of relevant Local Plans. While paragraph 9.2.8 in the HRA of the Draft Plan references Local Plans for Wandsworth and Merton, there does not seem to be a reference to Richmond, yet for our Local Plan there was further work on the in-combination air pollution effects to be able to screen out this pathway. We would welcome the opportunity to review this further modelling that is referenced in the HRA of the Draft Plan. It is not clear at this stage that a sufficiently

[43] Draft London Plan Habitats Regulations Assessment (2026) (under 'Related documents')

robust assessment of the potential effects has been carried out to support the draft Plan, based on a precautionary approach and informed by local evidence. The HRA concludes that the Draft Plan will not result in a negative effect through the air quality impact pathway on Wimbledon Common SAC, whilst also acknowledging that further air quality modelling is being undertaken and recommending that such modelling should inform future HRA work and local plan-making. It is therefore, unclear how the conclusion of no adverse effect has been reached in advance of this additional evidence becoming available. This raises concern that effects may be raised when future Local Plans are brought forward even if they are in general conformity with the expectations of the London Plan. We would therefore welcome clarification as to how boroughs should apply the conclusions of the London Plan HRA where subsequent local evidence gathering identifies a need for more detailed assessment of potential effects on European Sites.

Integrated Impact Assessment (IIA)

Whilst the findings of the IIA[44] are broadly noted, given the potential adverse effects identified due to the scale of growth required, the Council considers that some cross-cutting issues could be more fully reflected throughout the assessment.

In particular, greater consideration should be given to the cumulative health implications of the draft Plan, including the interaction between development, health inequalities, access to green space, active travel and environmental quality. For example, it is considered that the role of Healthy Streets in delivering wider health, wellbeing and place-making outcomes could be more comprehensively assessed if there were clearer policy requirements in the draft Plan (see comments on MBUL9).

The Council also considers that the IIA could provide a more robust assessment of aviation related impacts and their implications for the achievement of London's climate objectives. In particular, the assessment should more clearly reflect the uncertainty identified in recent advice from the Climate Change Committee[45] regarding aviation decarbonisation and the extent to which airport expansion can be accommodated whilst remaining consistent with carbon budgets and Net Zero commitments (see comments on GLE9). The Climate Change Committee has advised that there is currently no credible pathway for Heathrow Airport expansion within the UK's climate commitments under existing policies and that significant additional measures would be required for expansion to be compatible with Net Zero. The Council therefore recommends that the IIA more explicitly assess these risks and uncertainties and their implications for the draft Plan's climate objectives.

The Council believes that the analysis which supports the proposed sequential approach to affordable green space (AGS), including off-site contributions, for policy GHR8 is unjustified and not supported by a clear argument. A higher threshold of evidence should also be established for providing off-site AGS contributions in areas of deficiency (AOD). The IIA suggests that this alternative approach would result in a reduction of IIA objectives 5: Health and community safety, 6: Equality of opportunity, 7: Climate change and 8: Biodiversity geodiversity, the Council disagrees. However, it is the Council's view that

[44] Draft London Plan Integrated Impact Assessment & Non-Technical Summary (2026) (under 'Related documents')
[45] Climate Change Committee (2026), Advice to the UK Government on proposed Heathrow Airport expansion, 16 September 2026

greater provision of AGS on-site would only result in greater benefits to the IIA objectives as it would increase the total amount of AGS in the borough and reduce the AOD.

Given the borough's proximity to Heathrow airport, the Council considers that the IIA could give greater consideration to the potential cumulative effects of aviation related activity on climate, air quality, noise impacts and environmental outcomes. The Council also considers that the assessment could more fully recognise the importance of strategic green and blue infrastructure assets, including the Thames corridor and internationally designated habitats, and the potential cumulative effects of growth on these assets.

Recognising the IIA is an iterative process, it is recommended that these matters are fully considered and embedded throughout the IIA, including within the assessment of cumulative effects.