

LONDON BOROUGH OF RICHMOND UPON THAMES

LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC

Opening Statement by the London Borough of Richmond upon Thames

TUESDAY 25 JUNE 2024

Welcome and introductions

My name is Christine Cook and I am the Head of Spatial Planning for Richmond and Wandsworth Borough Councils. On behalf of Richmond Council, I would like to welcome the Inspectors, Mr Jameson Bridgwater, and Mr Graham Wyatt, as well as all those attending these hearing sessions. The Council would like to thank at the outset all of those who have participated in the examination by submitting their views on the Local Plan. I would also like to take this opportunity to thank Charlotte Glancy, the Programme Officer from Banks Solutions, for her management of the examination process so far.

A dedicated team of officers have been working on the Local Plan over the last few years to reach this crucial stage in the plan-making process. A small cross-party informal Local Plan Member Group has dedicated time to steer officers. Sirs, Joanne Capper will be the lead officer for the Council for these hearing sessions, if you would direct your questions to her in the first instance and she will call for assistance from her colleagues, supported by specialist consultants as and when you [the Inspectors] invite the Council to respond or to assist in your exploration of matters and issues through these sessions.

The Journey of the new Local Plan

To introduce the plan to these hearing sessions I'd like to provide some context. This Local Plan has been prepared in response to several changes and challenges that are taking place in the borough and more widely in the London area. I would now like to take you through our Local Plan journey.

The Council's last Local Plan was adopted in 2018, and in 2020 in relation to two matters subject to legal challenge at that time. In 2019 the Council committed to commence the preparation of the next boroughwide Richmond Local Plan, leading to the Direction of Travel consultation from February to April 2020. At that time, it was considered that much had happened since the adoption of the previous Local Plan, with the accelerating pace of climate change, our growing population, and revisions to the National Planning Policy Framework and the then emerging new London Plan, with amongst other things an increased housing target for the London Borough of Richmond upon Thames. The Direction of Travel consultation invited views on how the borough should accommodate growth and plan for new development. Of

course, the challenging times of the Covid-19 pandemic then brought many changes to society. There remains uncertainty about the medium and long-term implications in some areas, however the pandemic has highlighted that some adjustments previously considered as unrealistic or unachievable, could be made to tackle threats to our society. It has renewed focus on the borough's assets, the importance of our local communities and opened up new opportunities.

The Council commissioned the evidence base envisaged in the Direction of Travel consultation. This includes the boroughwide Urban Design Study and Open Land Review, which together form the basis for a holistic understanding of the borough's constraints and capacity for growth. In addition, research to understand future needs for housing, employment, retail and leisure was commenced, along with a number of other specialist studies, such as those covering nature conservation and flooding. These were used to inform the drafting of the Plan, along with the comments and feedback received from the Direction of Travel consultation, and produce the so-called "Pre-Publication" or Regulation 18 version for public consultation, which was undertaken from December 2021 to January 2022.

Further evidence base refreshes and additional studies were then undertaken, including on net zero carbon, viability, sports and recreation, infrastructure, and updates to the earlier research including on housing, employment and retail and leisure. These, along with comments and feedback at Regulation 18 stage, and Duty to Cooperate engagement with neighbouring authorities and other statutory bodies, informed the preparation of the Council's final draft of the so-called "Publication" or Regulation 19 Local Plan. This was the subject of consultation from June to July 2023, and is the version of the Plan submitted to the Secretary of State for this examination.

The draft Plan is based around ten themes that informed the new vision for growth in the borough, which have been developed since the Direction of Travel consultation in 2020. Each theme has a range of policies:

- Responding to the climate emergency and taking action
- Delivering new homes and an affordable borough for all
- Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic
- Increasing jobs and helping business to grow and bounceback following the pandemic
- Protecting what is special and improving our areas (heritage and culture)
- Increasing biodiversity and the quality of our green and blue spaces, and greening the borough
- Improving design, delivering beautiful buildings and high-quality places
- Reducing the need to travel and improving the choices for more sustainable travel
- Securing new social and community infrastructure to support a growing population
- Creating safe, healthy and inclusive communities.

The borough context

The borough is a very special place to live, work and visit, with a unique character and identity that our communities value and are proud of. Characterised by its special and unique natural and historic environment, providing opportunities not only for those who live and work in the borough, but also for those from neighbouring and other London boroughs. We are the only London Borough spanning both sides of the River Thames, and the area is interspersed with open space - historic landscapes such as Richmond and Bushy Parks and the Old Deer Park amongst the network of green and blue infrastructure. Approximately 4.5 million tourists visit the borough every year, and we provide a green lung for southwest London. These unique characteristics are an asset, but also a constraint, which you will hear more about during the course of the Examination.

In total, more than two thirds of the borough is protected by either open land or conservation designations. The borough is home to the Royal Botanic Gardens, Kew World Heritage Site and the exceptional historic environment includes 85 designated Conservation Areas, over 1,100 listed buildings, as well as 14 Historic Park and Gardens all of which contribute to the special character of the borough. Many other areas are relatively dense low-medium rise towns and centres. The constraints mean that land values are high and opportunities for new development are limited. There are few opportunities for large sites and there has always been a dependency on small sites to contribute. The scarcity of land pushes prices even higher, and affordability is a particular concern. We have an ageing population and looking ahead projections suggest there may be lower future population growth.

Some of this context is not new, and there continues to be much emphasis in the Local Plan on protecting, and where possible enhancing, our special environment, local character and uniqueness through the planning process. You will hear from officers during the rest of the hearing sessions about the Council's ambitions – there continues to be an affordability crisis, that is exacerbated by the cost of living crisis, alongside an ecological crisis, and the climate emergency, on which our Councillors and residents are rightly setting ambitious 'asks'.

Sustainable development in Richmond borough

The draft Plan includes place-based strategies for nine high-level 'places' across the borough, with accompanying site allocations. The borough has been divided into nine high-level 'places', based on categorisation, to reflect a 'sense of place' as well as identifying areas recognised as 'places' by local people as part of the Urban Design Study. The place-based strategies indicate where specific areas for change are identified. Many site allocations are carried forward and updated from the existing adopted Local Plan, with the addition of new sites that may come forward.

With limited sites in the borough, the overarching spatial strategy continues the approach of the adopted Local Plan - to direct major development into the five town centres, and to support 'Living Locally' through the network of local centres, neighbourhood centres and parades spread

across the borough, with incremental intensification of existing communities as envisaged by the London Plan.

The holistic concept of “Living Locally” is embedded in the vision for the borough and is key to the place-making approach in the Plan. The concept is the idea that our places should be complete, compact and connected neighbourhoods where most things you need for shopping or visiting are an easy walk or cycle away. For many, the pandemic highlighted the benefits of living locally and having facilities locally; the concept responds to the challenges of climate change, health, affordability and liveability. Changes in the way we shop were already affecting our high streets before the pandemic, particularly internet shopping; the pandemic and associated lockdowns accelerated this trend. Recent changes to the planning system, particularly the introduction of the new combined business land use class E and changes to permitted development rights – [the ability to change more flexibly between uses and to build without needing planning permission] – mean that there is even more potential for change in our high streets than ever before. As more of us stayed at home, many have realised the value of our neighbourhoods – places to get our essential goods and services, to relax and meet, to enjoy our leisure time, and to appreciate our high quality open spaces.

Delivery of housing, and particularly increasing delivery of affordable housing, is a clear priority. Delivery has been lower than expected in recent years but a significant increase in the pipeline is now coming through. While meeting the housing target will be a challenge, the Council's position sets out a realistic, stepped approach to delivery. Contributions to affordable housing are sought from all new housing development, and the Plan seeks to make our expectations clear, and enable us to be robust and challenge viability. An ambitious and innovative approach is required by the extent of this challenge.

The Council's Climate Emergency Strategy sets out five priority areas (air, waste, water, nature and energy efficiency) and we need to ensure that the borough is prepared for the adverse impacts of climate change, particularly those resulting from extreme weather events such as heat waves, droughts and flooding. We have committed to be a net-zero carbon borough by 2043 at the latest. Developers, local businesses and residents bringing forward all types and all sizes of development schemes within the borough as part of planning applications, all have a fundamental role to play, and all new development proposals coming forward within the borough should be zero carbon. The Local Plan places emphasis on reuse and conversion of existing buildings to minimise release of embodied carbon, with a presumption in favour of refurbishment, recognising the tensions with the historic environment and finding the optimum solution for each site.

There have been significant amendments in the Plan to the retail policy approach, retaining a town centre first policy, with a key focus on diversifying town centres, but updating the designations – based on comprehensive retail research assessing the borough's centre hierarchy, defining primary shopping areas for the town centres and centre boundaries.

It is important the business community is supported to grow and continue to contribute to the vibrancy of the Borough. Policies include protecting employment land, to ensure we have enough space for local businesses, that is modern, affordable and adaptable to future

employment needs. By protecting the stock of employment land and promoting training opportunities, there will continue to be opportunities for local work and production of goods and services, in whatever form that may take in the future, thinking over the long-term.

As in previous Local Plans, the borough will struggle to meet objectively assessed housing and employment needs. However, the Local Plan seeks opportunities to meet the development needs in the borough, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF. This approach is consistent with paragraph 11 of the NPPF.

Summary and conclusion

To conclude, the Council considers that this Local Plan provides a sound and positive strategy for achieving sustainable development in the borough. Taking into account the ambitions that I have outlined, it sets a policy framework to enable balanced decision-making, to allow development opportunities to come forward for consideration and a site-specific assessment of benefits weighed against any shortcomings in meeting policy requirements. There can often be multi-functional benefits in how we manage land for biodiversity, climate change, active travel, health and recreation. With few large sites available, there is pressure on land for other key uses including schools and employment to support the achievement of sustainable communities.

All the statutory procedures and legislation, including for public consultation, have been adhered to and the Council is confident that the Plan is 'sound as it has been positively prepared, it is justified, it is effective and it is consistent with national policy as well as in general conformity with the London Plan'.

I would acknowledge that, since the Regulation 19 consultation, the Council has produced a schedule of our initial suggested modifications and a series of Statements of Common Ground signed with Duty to Cooperate bodies. To clarify, this is intended to be helpful and in response to representors comments at Regulation 19 and those of consultees. I hope, Sirs, it assists in the examination process. Further to that, you [the Inspectors] have identified those matters you consider require closer scrutiny through these hearing sessions and engaging with representors. The Council welcomes the opportunity to actively engage in positive discussions with you [the Inspectors] and participants. I confirm that the Council has formally asked the Inspectors to recommend Main Modifications to the plan where necessary to make the Plan sound and legally compliant.

Christine Cook
Head of Spatial Planning
Place Division, Chief Executive's Directorate
London Borough of Richmond upon Thames