**Consultation on proposals to implement the parts of the Levelling Up and Regeneration Bill which relate to plan-making, to make plans simpler, faster to prepare and more accessible.**

**London Borough of Richmon upon Thames**

**Chapter 1: Plan content**

| | Question | Response |
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| 1. | Do you agree with the core principles for plan content? Do you think there are other principles that could be included? | Richmond's draft Local Plan is currently at Regulation 19 stage following adoption at full council in June 2023. We are preparing for submission to the Planning Inspectorate later this year. Our draft Plan is anchored by a strong vision statement that incorporates the ten strategic objectives that set the framework of the entire Plan, and address the environmental, social and economic needs of the borough. Acting as a golden thread tying all this together is our policy on Living Locally which takes a local approach to the 20-minute neighbourhoods concept. We carefully monitor how our plan is being delivered, supported by a thorough monitoring framework, to feed into Plan revisions and Supplementary Planning Documents. |
| | | Therefore, we support the core principles for plan content. We also support a focus on climate change adaptation, locally distinctive policies, fostering beautiful places, and monitoring. We note, however, the consultation document states at paragraph 14 that plans *may* include details of requirements for affordable housing. We would like to see a much more robust requirement to set out the affordable housing needs of an area in local plans with a strategic focus similar to that given to climate change adaptation, which details how those needs will be met though the policies of the plan. |
| | | Paragraph 14 places emphasis on policies to deal with 'amount, type and location of, and timetable for, development'. It is unclear as to why this is emphasised as this is only part of what makes up a Local Plan – with polices regarding placemaking, design, mitigation and adaptation, and protection and enhancement, which are equally as important in guiding development in the Borough. |
| 2. | Do you agree that plans should contain a vision, and with our proposed principles for preparing the | Our adopted Local Plan already contains a vision similar to what is proposed. However, to limit the focus of the vision to what is deliverable within the plan period is of concern. |

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| | vision? Do you think there are other principles that could be included? | Local Plan policies lay the groundwork for a goal that is deliverable over a longer timeframe beyond the plan period, e.g., our ambition for 20-minute neighbourhoods, and there is a benefit to include 'blue-sky thinking' in the event that something becomes deliverable within the plan period. The Local Plan cannot predict all development opportunities that might arise, and a vision that focuses on deliverability would be somewhat restricted. |
| 3. | Do you agree with the proposed framework for local development management policies? | While we welcome the addition of local development management policies, we are concerned about the relationship these will have to the proposed National Development Management Policies. There needs to be further clarification that appropriately justified local DM policies will supersede NDMPs. |
| | | The Council would like to reiterate the significant challenges that the government would face in respect of defining nationally coherent development management policies that are fit for use and application across the whole of England. With so much variation across the country, it is of utmost importance that there is flexibility for local planning authorities to add extra considerations or value to such policies where local circumstances can be shown to justify such an approach. The Council would also like to see a mechanism introduced for not applying certain NDMPs, where there is local evidence and justification, tested through a Local Plan examination, which would allow the authority to take a different approach. |
| | | Government should note that the current adopted version of the London Plan (unlike previous versions) includes a significant number of development management policies, which are not strategic; there were a number of policies contested by different London boroughs because they do not take account of specific local circumstances. We are therefore concerned that NDMPs would remove flexibility for a local planning authority to justify alternative and/or more ambitious approaches, and instead of striving for the best outcomes, the risk is that nationally we will have to settle for the lowest common denominator, to the |

| | | detriment of planning outcomes in local areas that take account of local circumstances and opportunities. |
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| 4. | Would templates make it easier for local planning authorities to prepare local plans? Which parts of the local plan would benefit from consistency? | The Council commends the intention to standardise Plans to improve consistency and accessibility for users. In general, the Council believes templates could prove useful in drafting plans and eliminating time in order to meet the 30-month timeframe. They would, however, be susceptible to becoming generic and missing out on emerging local issues due to time-crunch. It would be important that templates are produced as a guide and do not become a formula, with relative flexibility to adapt to individual local circumstances and enable local innovation, as it appears is the Government's intention. |
| 5. | Do you think templates for new style minerals and waste plans would need to differ from local plans? If so, how? | While the Council does not prepare its own minerals and waste plans, it commends the intention to standardise Plans to improve consistency and accessibility for users. In general, the Council believes templates could prove useful in drafting plans and eliminating time in order to meet the 30-month timeframe. They would, however, be susceptible to becoming generic and missing out on emerging local issues due to time-crunch. It would be important that templates are produced as a guide and do not become a formula, with relative flexibility to adapt to individual local circumstances and enable local innovation, as it appears is the Government's intention. |

**Chapter 2: The new 30-month plan timeframe**

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| 6. | Do you agree with the proposal to set out in policy that planning authorities should adopt their plan, at the latest, 30 months after the plan preparation process begins? | We commend the government's desire to increase the number of Local Plans that are adopted and decrease the amount of time it takes to get a plan in place. We also think there is merit in setting out a timeframe. However, we are concerned that the proposed changes will not achieve this. By focusing on speeding up the process of plan making, the quality of plans produced and the opportunities to genuinely engage with the public will decrease. We would urge that a pragmatic approach is woven into the timetable to enable necessary, and sometimes unforeseen work not to be accounted for so as to avoid negatively impacting the process.<br><br>Based on our very recent experience, 30 months is not a realistic timeframe, largely due to PINS resource. We would |

| | | question whether this would lead to genuinely better outcomes and more certainty. It is also considered to be unfair because post Regulation 22, i.e. submission of the Plan to the Secretary of State for independent examination in public, significant delays can occur during the examination stage, e.g. appointment of Inspectors, Inspector availability, the Matters/Issues/Questions raised by the Inspectors, issues at the examination hearing sessions, modifications consultation etc. If anything, only the period up to Regulation 22 stage should be measured, as that is within the control of the local planning authority. In our experience, the examination period is at least 12-14 months but could be more depending on the issues that arise. It would be entirely unrealistic to expect all the stages up to Regulation 22 to be undertaken in less than 16-18 months, bearing in mind democratic services and decision-making cycles, gathering proportionate and robust evidence, statutory public consultation stages, resourcing and staffing shortages etc. |
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| 7. | Do you agree that a Project Initiation Document will help define the scope of the plan and be a useful tool throughout the plan making process? | We consider that a Project Initiation Document as currently proposed would generally be a helpful document to define the scope and identify evidence required. However, as it is expected to be prepared before 30-months timeframe, clearly stated requirements set out in regulations may be required to ensure consistency in approach and so not too much time is devoted to the PID as it evolves over time and across plan making cycles. We welcome the intention to provide a digital template for this PID for this reason.<br><br>Additionally, how the PID can set out the project management of the plan will require further guidance, as rigid project management principles are unlikely to be fully adhered to in practice, especially for Councils where a ridged approach to project management is not commonplace. Again, a degree of pragmatism will be necessary to allow for changes to the PID.<br><br>While the emphasis on engagement is welcome it is unclear to what extent will the Council be required to incorporate suggestions by communities and key stakeholders for "what the plan should contain" and the "key issues that should be addressed." |

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**Chapter 3: Digital plans**

| 8. | What information produced during plan-making do you think would most benefit from data standardisation, and/or being openly published? | The Council welcomes proposals to standardise data, especially to ensure that LPAs do not receive data in inconsistent formats to speed up time that data can be processed and utilised. There is a concern that overly standardising data, while reducing workload and contributing to delivering plans faster, could remove a lot of the local context or the local approach. For example, we have experienced inconsistency between our own data collection for town centre surveys, which has focused more holistically on uses that contribute to living locally, while data commissioned by the Greater London Authority has had a more commercial focus and the local context is not present. What data is openly published needs to be considered carefully as there may be unintended consequences from publishing information which could be commercially sensitive about sites.<br><br>Therefore, information we believe could benefit from data standardisation and/or being openly published include:<br><br>LA produced:<br><br>• Site Allocations (date allocated, permitted, capacity, use, location)<br><br>• Housing completions / 5-year supply (AMR)<br><br>• Policies Map (standardisation, open GIS)<br><br>• Conservation Areas / Locally Listed Buildings<br><br>• Article 4 directions (addresses, dates, type)<br><br>• Automated planning constraints checks.<br><br>Developer / Public provided (would help plan production):<br><br>• Call for sites<br><br>• Consultation responses |

| | | All of which would benefit from data standardisation, and/or being openly published. |
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| | | The Brownfield Register is a good example of a standardisation approach (i.e., same format applied) that has worked well, and this sort of thinking could be applied to other parts of the process – such as a 'call for sites' to ensure a standard set of information is gathered in the same format. |
| | | The Council is very good at producing a Housing AMR with open housing data and interactive policies maps – these would be easy to adapt to standardisation but important that flexibility of approach is accommodated. |
| 9. | Do you recognise and agree that these are some of the challenges faced as part of plan preparation which could benefit from digitalisation? Are there any others you would like to add and tell us about? | The borough has successfully adopted a plan in an efficient manner under the current system but agrees with the challenges and barriers identified. Many of these issues can be resolved through resourcing and skill sets, but also should be addressed elsewhere such as through RTPI accredited degree courses which incorporate digital techniques. |
| | | A balance needs to be struck with guidance and templates vs flexibility to incorporate the local approach and not stifle creativity – esp. the digital approach. Parts of the borough experience digital poverty and DLUHC should be mindful that not all households or individuals are able to access information via digital means. The process should be fair for all. |
| 10. | Do you agree with the opportunities identified? Can you tell us about other examples of digital innovation or best practice that should also be considered? | The Council agrees with the opportunities identified. We believe that some of these innovations will contribute to more accessible plans for communities and key stakeholders. |
| | | We recognise that some of the opportunities and digital innovations or best practice may already be spearheaded in some authorities and that the Government is looking at |

| | | where these are already in place to identify gaps which we support. |
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| 11. | What innovations or changes would you like to see prioritised to deliver efficiencies in how plans are prepared and used, both now and in the future? | The Council would like to see the Government consider potential challenges to digitalisation. We are concerned that the focus on digitalisation of plans could have negative consequences for accessibility, such as screen-readers or other such technology, and we would welcome formal guidance for incorporating accessibility in digital plans. We also feel that to get the most out of digitalisation, there should be funding to ensure staff have the necessary skills. For example, to prepare visualisation of data. |
| | | Processing comments is one of the biggest resource drains / ineffective use of time for planners involve in plan-making. Currently there is no solution on the market to deal with a mix of responses and to enable their effective analysis. Quite often Officers are forced into using a variety of methods to carry out their analysis effectively and is often highly counterproductive. Any emphasis on a shift towards using digital technology to assist with this issue would be welcome and would assist the market in its delivery of a tool which is fit for purpose. |

**Chapter 4: The local plan timetable**

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| 12. | Do you agree with our proposals on the milestones to be reported on in the local plan timetable and minerals and waste timetable, and our proposals surrounding when timetables must be updated? | The Council believes the milestones identified are sensible and the ability to adjust the timetable at these points is welcome. It would be helpful if there is flexibility with the 30-month timeframe and a pragmatic approach applied so that exceptional circumstances identified at these milestones can be given the time to be appropriately dealt with, which may involve prolonging the process beyond 30 months. It may be useful that the timetable is updated following gateway assessments rather than at the commencement of each gateway. |
| 13. | Are there any key milestones that you think should automatically trigger a review of the local plan timetable and/or minerals and waste plan timetable? | The Council believes the milestones identified by the Government are sensible, though it may be useful to have the opportunity to update the timetable (and thus adjusting the timeframe) following a gateway assessment if considered necessary in order to progress the Plan rather than at the commencement of each gateway. |

**Chapter 5: Evidence and the tests of soundness**

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| 14. | Do you think this direction of travel for national policy and guidance set out in this chapter would provide more clarity on what evidence is expected? Are there other changes you would like to see? | The Council welcomes the direction of travel generally, but there are some concerns that require further clarification and further details that are intended to be outlined in guidance. We commend the Government for its intention to ensure that the amount of evidence produced is not overly onerous and proportional, and so we support the proposal to clearly distinguish between evidence required to demonstrate soundness and legal compliance with other information-gathering and assessment. While more proportionality in terms of local plan evidence is welcome, we have concerns that this could result in a plan that is not as robust or rigorously examined. It is important to ensure that the correct approach is taken based on evidence, and this should not be eroded in the face of delivering at pace. We welcome the intention to publish overarching guidance on evidence base, as well as clearer guidance around the local plan as an appropriate strategy and await further detail. |
| 15. | Do you support the standardisation of evidence requirements for certain topics? What evidence topics do you think would be particularly important or beneficial to standardise and/or have more readily available baseline data?<br><br>Do you support the standardisation of evidence? | The Council supports in principle the standardisation of evidence requirements which may reduce workload and save time when preparing a new Plan under the proposed timeframe. However, where there is a local justification to depart from the standardised approach this should be accepted. Further clarity would be required as to what exact topics will benefit from standardisation. |
| 16. | Do you support the freezing of data or evidence at certain points of the process? If so which approach(es) do you favour? | The Council supports the freezing of data and/or evidence but this would need to be justified depending on the nature of the Plan and its specific issues. Justification as to why data or evidence can be frozen should be required to be produced that would ensure that the approach does not impinge on the ability of all parties to present a plan that has clarity in its approach i.e., to make sure that all parties know that what is being proposed is actually correct. |
| 17. | Do you support this proposal to require planning authorities to submit only supporting documents that are related to the soundness of the plan? | We welcome the intention of the Government to publish guidance on what documents would be expected to be submitted for examination and a 'less is more' approach ought to be the aim. We feel, however, that the requirement to submit only what is considered strictly necessary will not go far enough to focus the evidence. The amount of evidence produced currently has grown exponentially over time as planning issues have become more complex and contentious. It is not apparent how the |

| | | proposed approach would prevent this happening again as what is considered 'strictly necessary' develops over time and across plan making cycles. Perhaps the first Gateway assessment could help Local Authorities decide on the key documents, perhaps a level of support from PINS could assist in this process. |
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**Chapter 6: Gateway assessments during plan-making**

| 18. | Do you agree that these should be the overarching purposes of gateway assessments? Are there other purposes we should consider alongside those set out above? | The Council believes that the overarching purposes of the gateway assessments are sensible and would help, in theory, to prevent snags later in the plan making process. In practice, however, more information is needed regarding how the assessments will work. The main concern is whether the role of the gateway assessments is to fulfil a more advisory function or a statutory function in addition to examination as this is not entirely clear. Another concern is the amount of preparation involved by the LPA to feed into a successful assessment and how this might eat into time devoted to plan making. The relationship between gateway assessments and examination is also not clear, and there is an opportunity for the gateway assessments to reduce the number of issues addressed at examination if something can be shown to have been addressed at gateway assessment. If the purpose of gateway assessments is to be purely advisory, then there would need to be much greater flexibility and control for the LPA especially if the process will be onerous and time consuming. The implications of unsuccessful assessments must also be clearly defined, such as whether it rolls back or extends the timeframe for the plan and flexibility to the LPA must be afforded to ensure that issues can be resolved. |
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| 19. | Do you agree with these proposals around the frequency and timing of gateways and who is responsible? | The Council supports the proposals in principle. It would be helpful if there was consistency across the gateways in regard to who is responsible so that the local context can be understood better at each stage and meaningful assessment can be made on progress. There also needs to be greater clarity around what point between the two consultation periods does the second gateway assessment take place. It is indicated that this will be defined in regulations and the Council believe a degree of flexibility will be needed so the LPA can respond to emerging issues arising out of the first consultation period and/or any other issues that may arise during the plan making period. |

| 20. | Do you agree with our proposals for the gateway assessment process, and the scope of the key topics? Are there any other topics we should consider? | The Council agrees with the proposals for the gateway assessment process in principle. The scope of the key topics is generally acceptable. The relationship between the gateway assessments and examination must be more clearly defined and whether assessments can be relied upon at examination. There is an opportunity for the assessments to sign off aspects of the Plan and reduce the amount that is discussed at examination. In relation to question 17, it would be helpful if at each stage the assessment identified what evidence is likely to be considered 'strictly necessary' to be submitted for examination and for this to carry through to examination. |
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| 21. | Do you agree with our proposal to charge planning authorities for gateway assessments? | The Council strongly disagrees with the proposal. Local Plans are expensive to produce and resourcing a sufficient quantum of officers to carry out the mandatory aspects of the plan making reforms will already put LPAs under pressure. We do not consider that a mandatory part of the process should be subject to a fee. If the proposal is carried forward, the rate should be fixed and set by Government cognisant of already stretched Local Government resourcing. |

**Chapter 7: Plan examination**

| 22. | Do you agree with our proposals to speed up plan examinations? Are there additional changes that we should be considering to enable faster examinations? | The Council welcomes the intention of Government to speed up plan examinations, however we are not convinced that the proposals to save time will be sufficient. In our experience examination can take 12-14 months long and this can often be due to factors outside the control of the LPA. Flexibility will be required for such exceptional circumstances.

Also, some of the proposals may unintentionally prolong the examination period. For instance, the 3rd party responses to MIQs can save time further down the line at examination, especially where there is something particularly contentious. There needs to be further clarification on what would constitute the "most significant" main modifications as, by definition, all main modifications alter the interpretation of the Plan.

In addition to our comments for questions 17 and 20, the Council believes that the relationship between the gateway assessments and examination needs to be more clearly |
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| | | defined, and that there is an opportunity to reduce the onerousness of examination if sufficient issues can be effectively 'signed-off' at gateway assessment. |
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| 23. | Do you agree that six months is an adequate time for the pause period, and with the government's expectations around how this would operate? | As above, the Council hopes that through the gateway assessment process the need for any pauses will be reduced if the relationship between the gateway assessments can be more clearly defined. That said, the Council holds the view that Inspectors should have the discretion to set their own pause period without a maximum for exceptional circumstances. There could be any number of reasons to require a pause period, and many are completely unforeseen such as the impact of the COVID-19 pandemic on ways of working, as an extreme example. Flexibility must be embedded into the process to allow for issues to addressed thoroughly. Ultimately, the point of a pause period is not entirely clear, as in the majority of cases that could require the trigger of the pause period are currently dealt with during examination without a 'pause period'. |

**Chapter 8: Community engagement and consultation**

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| 24. | Do you agree with our proposal that planning authorities should set out their overall approach to engagement as part of their Project Initiation Document? What should this contain? | The Council employs a full-time Senior Engagement Planner in attempt to maximise engagement. In preparing the Local Plan, we have held non-statutory as well as statutory engagement to gather resident views and inform development of the Local Plan using a variety of digital means. We are proud of the level of engagement we receive from relevant stakeholders and the community. However, without the resource of our full-time senior engagement planner it would not have been possible to carry out the level and quality of community engagement which again harks back to the ability of Local Authorities to acquire the necessary skills and budget e.g., through grant funding such as PropTech.<br><br>We support the proposals to replace SCIs with an overall approach to engagement within the PID which may make it easier to keep consultation methods kept up-to-date and plan specific. Our current SCI details the types of Community Involvement and consultation methods to be employed for the Local Plan review, as well as how and when responses are reported back. |
| 25. | Do you support our proposal to require planning authorities to notify | The Council strongly prioritises engagement and welcomes changes that would enable early engagement with |

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| | relevant persons and/or bodies and invite participation, prior to commencement of the 30-month process? | communities and statutory bodies. The flexibility afforded to authorities around what focus of early participation should be is also welcome, and the suggestions by the Government about what early engagement could entail is good. |
| 26. | Should early participation inform the Project Initiation Document? What sorts of approaches might help to facilitate positive early participation in plan-preparation? | The Council has held workshops with residents and school pupils. These kinds of format can encourage more considered or creative responses and ideas especially from seldom-heard groups. Proactive engagement exercises can initiate interest in the plan-making process and win early buy-in from the community. The ability to hold these kinds of informal engagement activities is ultimately down to resourcing, however. We support the proposal for the early participation to take the form of a focused, timebound early participation period, though we believe this period should be earlier than four months before the first gateway assessment to give sufficient time to incorporate the suggestions and findings into the PID. It could also be helpful to liaise early with statutory bodies to identify issues at the start of the plan making period and reduce potential contention further down the line. |
| 27. | Do you agree with our proposal to define more clearly what the role and purpose of the two mandatory consultation windows should be? | We feel that the proposed approach is currently how the two statutory consultation windows operate in practice and there will not be any major change. There needs to be further clarification whether the second consultation window will remain focused on the soundness of the Plan or whether further changes can be made following this consultation before submission. If the latter, the third gateway assessment can perhaps serve as a soundness test through the proposed stop/go approach. |
| 28. | Do you agree with our proposal to use templates to guide the form in which representations are submitted? | The Council welcomes the intention to use templates to guide consultation responses and hopes that it might encourage more responses. However, we believe there needs to be a degree of flexibility to apply the local context, especially in the first consultation period. If the consultation form is too generic it may not illicit the kind of creative responses that would deliver the kind of local innovation the new-style plan making system is centring. |

**Chapter 9: Requirement to assist with certain plan-making.**

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| 29. | Do you have any comments on the proposed list of prescribed public bodies? | We have no comments on the proposed list and welcome the 'where relevant' subsection. It is not always the case |

| | | that consultees are able to respond in a timely manner to consultations. |
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| 30. | Do you agree with the proposed approach? If not, please comment on whether the alternative approach or another approach is preferable and why. | The Council agrees with the proposed approach. The need of the public body to provide relevant assistance will be of significant benefit in maximising early participation and ensure a thorough consultation to inform the preparation of the PID. |

**Chapter 10: Monitoring of plans**

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| 31. | Do you agree with the proposed requirements for monitoring? | The Council is supportive of the proposed approach in principle, but we require further clarification on the relationship between the proposed monitoring requirements and the Authority Monitoring Reports, as there appears to be a lot of overlap with the proposed metrics below. Whether the proposed approach will replace, can be incorporated into, or is expected to be prepared alongside the AMR, will need to be clearly defined. We welcome that LPAs will be able to supplement reporting with locally significant metrics. Further guidance would be required on the detailed return to ensure consistency across LPAs and that it is focused. |
| 32. | Do you agree with the proposed metrics? Do you think there are any other metrics which planning authorities should be required to report on? | As noted in our answer to question 31, the Council requires the intended relationship between the proposed monitoring requirements and the Authority Monitoring Reports to be clearly defined, as there appears to be significant overlap with the proposed metrics. We welcome that LPAs will be able to supplement reporting with locally significant metrics. We believe Councils should also report on affordable housing delivery and progress towards delivery of the Playing Pitch Strategy (if applicable). We note the details of the metrics to be included in the Environmental Outcome Reports is forthcoming and we await further details. |

**Chapter 11: Supplementary plans**

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| 33. | Do you agree with the suggested factors which could be taken into consideration when assessing whether two or more sites are 'nearby' to each other? Are there any other factors that would indicate whether two or more sites are 'nearby' to each other? | Whilst Supplementary plans could provide a useful purpose in providing additional policy detail, the Council is very concerned about the practical reality of such plans coming forward given that they are subject to the same procedure as Loal Plans. The reality is that overstretched planning departments are unlikely to prioritise Supplementary Plans over and above Local Plans whereas the current process would allow for SPDs to be produced in a much easier way thus providing necessary guidance and flexibility to bring forward such documents as required. A good recent example of this in Richmond is the production of the Kneller |

| | | Hall SPD which was brought forward whilst working on the now adopted Local Plan. The Council is very concerned that the ability to produce such documents at pace will be substantially diminished to the detriment of much needed guidance. An example of the importance of such documentation is the Richmond Planning Obligations SPD which is regularly reviewed to allow the Borough to require obligations to allow development to be appropriate – without this flexibility there is a real risk that developer contributions will be diminished to the detriment of our communities.

The Council does not agree with the approach that supplementary plans can only be site specific or relate to two or more 'nearby' sites, with the exception of design related plans, as we believe supplementary plans are important to present extra and more up to date detail that may not be appropriate or expedient for inclusion in the Local Plan. Supplementary plans are particularly useful to provide thorough information that would make the Plan policy too long and unwieldly, such as an Affordable Housing SPD, Climate Change SPD, or Trees SPD. The flexibility to publish supplementary plans on borough-wide issues that extend beyond design should be retained, and clarification is needed on whether "delivery of planning obligations" can include these borough-wide considerations.

The factors outlined to determine whether a site is considered 'nearby' are sensible. We would recommend a different choice of term than 'nearby' as this implies a limitation to sites in geographical proximity. Our suggestions include 'relevant' or 'related' sites. |
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| 34. | What preparation procedures would be helpful, or unhelpful, to prescribe for supplementary plans? e.g., Design: design review and engagement event; large sites: masterplan engagement, etc. | The Council believes that each authority will have a system that works for them in the way that supplementary plans are produced. As the Government acknowledges, different preparation procedures may be suitable for different types of supplementary plans. We would welcome guidance on best practice for the preparation of supplementary plans, but we believe that the flexibility to decide on the procedure should be at the discretion of the LPA. |
| 35. | Do you agree that a single formal stage of consultation is considered sufficient for a supplementary plan? If | The Council considers there is little need to undergo a 'visioning' stage such as with the Local Plan. Stakeholders will usually be presented with a full draft version of the |

| | not, in what circumstances would more formal consultation stages be required? | proposed plan and so one formal stage of consultation will be sufficient. |
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| 36. | Should government set thresholds to guide the decision that authorities make about the choice of supplementary plan examination routes? If so, what thresholds would be most helpful? For example, minimum size of development planned for, which could be quantitative both in terms of land use and spatial coverage; level of interaction of proposal with sensitive designations, such as environmental or heritage. | The Council considers that examination for supplementary plans would put undue pressure on local authorities' already stretched financial and staffing resources and inhibit the ability to respond to change quickly and efficiently. We do not support the introduction of examination to the supplementary plan process and believe the current process for adoption of SPDs, with formal consultation, is already appropriate.<br><br>If examination is to be brought forward, we believe that all plans should be examined through written reps by default, and only where it is considered absolutely necessary should a hearing be called. This is to prevent a plan that would technically meet a threshold for a hearing but could be more appropriately dealt with through written reps, while ensuring that cases where a hearing is more appropriate can be dealt with that way. As such, we do not support the introduction of thresholds. |
| 37. | Do you agree that the approach set out above provides a proportionate basis for the independent examination of supplementary plans? If not, what policy or regulatory measures would ensure this? | The Council raises concerns about the practical realities of producing a Supplementary Plan and how onerous this is compared with the existing SPD approach. As outlined in the response to Q.36, the Council considers examination of supplementary plans would put undue pressure on financial and staffing resources and inhibit the ability of the Council to introduce supplementary plans quickly where needed and as such do not support examination as part of the supplementary plan process.<br><br>We suggest further clarification is required on the definition of 'nearby' sites, particularly where the plan might concern the delivery of planning objectives. |

**Chapter 12: Minerals and waste plans**

| 38. | Are there any unique challenges facing the preparation of minerals and waste plans which we should consider in developing the approach to implement the new plan-making system? | As the Council does not prepare its own Minerals and Waste Plan, we reserve judgement on this question. |
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**Chapter 13: Community Land Auctions**

| 39. | Do you have any views on how we envisage the Community Land Auctions process would operate? | Although the idea of a Community Land Auction is good in practise, as this could help the local authority capture some of the land value before granting permission, it would be very unlikely for this type of scheme to work in the London context as even very constrained sites can command very high land values, Richmond like most local authorities is under financial pressure and it would be unlikely that the council could justify these significant purchases using public money. There appears to be an onus on the Local Authority to work collaboratively with the landowner to come to a price and carry out an assessment of appropriate uplift values, when most local authorities don't have the resources to carry out these type of specialist valuations and detailed discussions. In addition, the potential risks attached to these sites from aspects such as contamination, flooding etc which is of particular concern in Richmond if the LPA decided to try to develop the site themselves without the expertise in house. It could also compromise the publics opinion of the planning process if the council is granting multiple permissions on less suitable land, they have purchased themselves. This process could also result in less suitable sites being developed due to the financial gain of the local authority, as these sites are likely to command a lower land value. It would need to be ensured that this process would be compatible with the wider plan making process. |
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| 40. | To what extent should financial considerations be taken into account by local planning authorities in Community Land Auction pilots, when deciding to allocate sites in the local plan, and how should this be balanced against other factors? | Financial consideration should not be relevant when deciding to allocate sites within the plan, having financial considerations within the allocation process of the local plan would be highly likely to further impact on the public's opinion of the council. Within the allocation process the most important aspects should be: sustainability, accessibility to public transport, surrounding constraints, conservation and impacts on the surrounding area and the impacts on existing residents. It would be detrimental to the public opinion of the local authority for a site to be allocated due to financial gain for the local authority over a sustainable, well-located site which meets the Council ambition for 20-minute neighbourhoods. It would be very dangerous to allow local authorities to be able to view sites in this way and would not allow them to be subjective in the site allocation process, it would effectively be considered a conflict of interest. |

**Chapter 14: Approach to roll out and transition.**

| 41. | Which of these options should be implemented, and why? Are there | The Richmond Local Plan is currently at Regulation 19 Stage, following adoption at full council in June 2023. We intend to |
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| any alternative options that we should be considering? | submit to the Planning Inspectorate in Autumn/Winter 2023 and intend to get the Plan adopted well before the 31 December 2026 deadline. It will therefore be up to date until at least 2029 and should not be subject to the initial implementation of the new system. However, we believe that clarity would be useful where a Council is looking to submit a plan after the cutoff point where the Council has a recently adopted plan whether they will then be at a later 'wave' and potentially end up starting the 30-month process with a plan that is older than 5 years. We don't think boroughs should be penalised when they are proactive in plan making if there is a block. A transitional timetable accompanied with further guidance is welcome. |

**Chapter 15: Saving existing plans and planning documents.**

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| 42. | Do you agree with our proposals for saving existing plans and planning documents? If not, why? | The Council supports the proposals but suggests caution as we assume all current SPDs will also cease to be a material consideration so many Local Authorities including this borough would be without important guidance that is relied on to steer planning application decision making. Perhaps transitional arrangements for current SPDs if still relevant upon the adoption of a new style plan could prove useful. |

**Equalities impacts.**

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| 43. | Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010? Please provide a free text response to explain your answer where necessary. Is there anything that could be done to mitigate any impacts identified? | We believe the proposed focus on maximising engagement will be beneficial to many people with protected characteristics to give more opportunities to engage with the process and ensure their voices are heard. However, the focus on digitalisation could impact older people who are not as technologically savvy, or impact on accessibility such as for screen readers or other accessibility technology. |