

LONDON BOROUGH OF RICHMOND UPON THAMES
LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC
WRITTEN STATEMENT

MAIN MATTER 2:
SPATIAL STRATEGY (POLICIES 1 AND 2)

TUESDAY 25 JUNE 2024

COUNCIL RESPONSES TO MAIN MATTER 2

Abbreviations

GLA – Greater London Authority

LP – The London Plan

NPPF – National Planning Policy Framework

PTAL – Public Transport Accessibility Level

RLP – Richmond Local Plan

SA – Sustainability Appraisal

SoCG – Statement of Common Ground

TfL – Transport for London

- **2.1 Is the Spatial Strategy for the London Borough of Richmond justified by appropriate available evidence, having regard to national guidance, and local context, including the London Plan?**

The Council's response to Main Matter 1 and question 1.4.1 sets out the RLP approach to sustainable development which is consistent with the NPPF. The NPPF sets out that all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects. The NPPF places a value upon the importance of existing centres, and recognises the importance that they play at the heart of communities. It maintains a sequential approach to main town centre uses that ensures that centres are not disadvantaged by new development which are not centrally located (Section 7). It promotes mixed-use communities where social interaction is promoted and places have good street layouts that are easily connected through pedestrian and cycle routes and provided with safe and accessible green space (Section 8). Into this is added the early consideration of transport routes and modes to ensure that sustainable means of movement can be employed and encouraged, and development is focused on locations which are or can be made sustainable (Section 9). In meeting the defined needs of a place – housing and employment in particular – best use should be made of existing and available land, and its use should be optimised based on character and context assessments. The December 2023 NPPF clarifies at paragraph 130 that there may be situations where higher densities would be wholly out of character with the existing urban area, and that this could be a strong reason why significantly uplifting densities would be inappropriate.

The London Plan 2021 aims to be consistent with national policy. It is underpinned by the idea of 'good growth' and sets out six key policies (GG1 – GG6) that focus on building strong and inclusive communities, making the best use of land, delivering the homes that London needs and growing the economy whilst maintaining resilience and efficiency to create successful mixed-use places. The London Plan has a spatial strategy that defines the way the Mayor sees the city developing in the plan period. Although there are no growth corridors or Opportunity Areas directly relevant to Richmond borough, the strategic framework in chapter 2 sets the expectation for incremental change in outer London; paragraph 2.0.3 notes this is where the suburban pattern of development has significant potential for appropriate intensification over time, particularly for additional housing.

Beyond the setting of this spatial framework across London, the London Plan contains a series of policy expectations and targets for individual boroughs that are set out across the

suite of policies. The ten-year housing target is set at 4,110 homes, as expressed at London Plan Policy H1. Within this target is a minimum target for achieving completions on small sites (Policy H2) which is set at 2,340 completions over the ten-year period. Paragraph 4.2.4 on incremental intensification expects this in existing residential areas within PTALs 3-6 or within 800m distance of a station or town centre boundary.

The London Plan requires a plan for sufficient employment and industrial space in the right locations to support economic development and regeneration, including setting the approach to diverse office markets in outer London and locally significant industrial sites.

In addition, the London Plan contains within it other targets that the borough needs to consider within the plan, particularly other strategic approaches and designations – such as open space, the retail hierarchy, waste – that need to be translated into a local plan. The environmental constraints identified include the locally distinctive historic and cultural environment, parks and open spaces, the River Thames and its floodplain.

The Spatial Strategy in the RLP is set out in section 4 and in particular Policy 2 (as detailed further in question 2.3 below). It is informed by the strategic objectives and articulated in the strategic vision and through the subsequent place-based strategies in the RLP, and sets out how to manage change in the borough. The overarching spatial strategy continues to direct major and higher density development to the town centres or places that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, 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. This also accords with the Mayor's Town Centre Network set out in the London Plan, recognising the role of the borough's town centre tier as major/district centres in the Mayor's network and their potential.

To understand future needs for housing, employment, retail and leisure, there are up-to-date boroughwide assessments forming part of the evidence base. The Open Land Review and Urban Design Study together form the basis for a holistic understanding of the borough's constraints and capacity for growth. The emphasis is on promoting green infrastructure and mitigating the impacts of climate change and protecting the borough's environment, local character and heritage assets. The supporting text to Policy 2 details the aims to meet the needs of local communities and businesses, and sets out an overview of the details of the evidence base around future needs (in particular paragraph 4.19 of the RLP) and the borough's constraints and capacity for growth. The Council's responses to other Main Matters in particular 3, 14 and 15 set out in more detail future needs. The Schedule of Proposed Modifications suggested by the Council (May 2024) (LBR-002) sets out an

additional modification to update the supporting text to Policy 2 at paragraph 4.19, to correct an error in the housing needs figure and to reference the Update Addendum to the Retail & Leisure Needs Study (see the table at end of this statement, proposed changes P2.1 and P2.2).

The RLP seeks to meet these future needs and make effective use of land, with a spatial strategy to ensure opportunities for development to come forward by optimising the use of sites. However it is recognised that there is limited land supply and constraints. The spatial strategy builds on the concept of the 20-minute neighbourhood, complete, compact and connected neighbourhoods where most things people need are an easy walk or cycle away. The focus remains on steering major and higher density development into the five town centres – Richmond, Twickenham, Teddington, Whitton and East Sheen. The Urban Design Study (SD-052) sets out an overall development strategy (as shown at Map 4.2 in the RLP), with the broad areas that form part of the strategy for tall and mid-rise buildings, although there are only a few contained areas within the borough which have capacity for tall buildings, within town centres, and/or within previously developed sites, along with some capacity for mid-rise buildings. Following the Open Land Review (SD-054) only one site has been found where exceptional circumstances were considered justified to release land designated as MOL for affordable housing. In line with the London Plan, the spatial strategy directs incremental intensification to existing residential areas within a high PTAL or close to stations or town centres, as identified on the Key Diagram.

Although the spatial strategy was not a dedicated policy in the adopted Local Plan, the broad approach has been continued from previous plans, and in the borough context it is not considered there is any reasonable alternative. The RLP has been subject to, and informed by, the process of Sustainability Appraisal (SA), as set out in the Council's response to Main Matter 1 and question 1.3.3. The updated Sustainability Appraisal (June 2023) (SD-002) discusses alternative policy options to the spatial strategy at paragraphs 1.3.17 to 1.3.23 noting how alternative policy options are limited in the borough context. The appraisal of Policy 2 considers it represents the favoured approach against the SA objectives. In addition, the London Plan 2021 itself was subject to an integrated impact assessment, which considered a range of spatial options, including Green Belt release and how housing growth should be accommodated, in support of the preferred approach to sustainable intensification.

There have been some representations during the preparation of the Plan in regard to the spatial strategy, recognising some broad support and where specific aspects are not included. It is acknowledged that the spatial strategy and Policies 1 and 2 are overarching and strategic in nature, and as the Plan should be read as a whole, detailed matters are set

out elsewhere or may be beyond the remit of the Local Plan. The Council's response to question 2.3 sets out in more detail the representations to the Publication (Regulation 19) consultation on Policies 1 and 2.

The RLP includes key sites that are considered to assist with the delivery of the spatial strategy of the Plan as Site Allocations. A number of sites have been promoted during the preparation of the RLP, for site allocations or for mixed-use or specific land uses, typically for housing or mixed-use development including housing, so-called "omission sites". The Council considers there is no requirement or justification to allocate any additional land including as further Site Allocations. Proposals on brownfield sites can be brought forward through the planning application process and considered against the RLP, but in line with the strategic objectives and spatial strategy as set out above and elsewhere in the Council's responses, it is not considered appropriate to further alter any protective designations at this point in time, particularly for land with existing open land, employment and waste designations. Further details have been set out in relation to specific sites in the Schedule of responses to the Publication Local Plan (Regulation 19) consultation (in plan order) with the Council's response (January 2024) (SD-014) and earlier in the plan preparation in the Schedule of sites not taken forward as Site Allocations in the new Draft Richmond Local Plan (December 2021) (SD-036).

- **2.2 Is the plan period sufficiently defined i.e., clearly written and unambiguous?**

Paragraph 23 in the September / December 2023 NPPF sets out that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. Paragraph 22 states strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. For town centres, it is noted that paragraph 86d in the September 2023 NPPF / paragraph 90d in the December 2023 NPPF sets out that policies should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. It is noted that a 15 year plan period is expected in Government guidance, but is not a legal requirement.

The Council committed to commence the preparation of this new Local Plan in 2019. The 'Direction of Travel' public consultation undertaken in April 2020 set out the evidence base

envisaged, which was then commissioned and produced. A number of reports have been published since 2021, including further studies and updates as appropriate. These include:

- For housing, the Local Housing Needs Assessment (SD-056) considers the overall housing need and projections to 2039. The Housing Delivery Background Topic Paper (SD-019) provides detail on the housing target and trajectory for the whole plan period – covering years one to five (2023/24 to 2027/28), years six to ten (2028/29 to 2032/33), and years eleven to fifteen (2033/34 to 2038/39). Further details are set out in the Council's response to Main Matter 3 and question 3.1.
- For employment, the Employment Land and Premises Needs Assessment Update (SD-058) forecasts future employment land needs to 2039, with Experian economic forecasts to 2041. Further details are set out in the Council's response to Main Matter 15 and question 15.4.
- For retail, the Retail & Leisure Needs Study – Update Addendum April 2024 (PSED-02) includes retail floorspace forecasts up to 2039. In line with the NPPF for town centres, this Update Addendum and the Retail & Leisure Needs Study Phase 2 Final Report (January 2023) (SD-060) advised that given the uncertainties relating to very long-term projections, the Local Plan could address floorspace projections up to 2034 rather than 2039. Projections beyond 2034 will be monitored and kept under review. Further details are generally set out in the Council's response to Main Matter 14.
- For infrastructure, the Infrastructure Delivery Plan (detailed assessment) (April 2023) (SD-069) identifies future infrastructure and service needs for the borough including for example social and community infrastructure and transport.

The vision in section 3 of the Publication (Regulation 19) Local Plan (SD-001) looks ahead to 2039. At the outset of preparing the Plan, it is difficult to confirm the adoption date. It is envisaged that the Plan may be adopted in 2024/25. Informed by the evidence base as set out above, the Council considers the Plan and the Site Allocations, in particular that address housing, retail, employment and infrastructure needs, address the minimum 15 year period from adoption and is sufficiently defined.

It is recognised that forecasting and identifying sites in the long-term becomes more difficult. In the urban context of London, there can be renewal of areas and land assembly that enables the creation of larger sites, and there is only clear visibility on brownfield supply for around 10 years.

The Plan has been prepared during the challenging times of the COVID-19 pandemic which caused dramatic changes in the short-term, and an uncertainty about how behavioural and

societal change may alter in the medium to long term. There continue to be impacts due to Brexit. The 2021 census revealed population growth had been lower than forecast, and recent projections estimate much lower population growth, albeit there remain challenges around how the population will change. A cost of living crisis has brought further pressures on resource and income. All of these factors mean there is uncertainty regarding long-term trends, and new trends may continue.

While plan-making is, as far as it can, expected to take into account economic cycles and fluctuations during a plan period, external circumstances will change and some of these factors may trigger whether there would be a review of this Local Plan, as set out in paragraph 26.26 of the Publication (Regulation 19) Local Plan (SD-001). It is expected that a review of the London Plan 2021 will commence following the recent Mayoral elections in May 2024, with the Planning for London Programme having been underway in recent years to gather views and evidence about meeting the challenges facing London. The Government's plan-making reforms in future are expected to set out timescales for preparing and adopting a plan, and therefore it is reasonable to expect this Local Plan will be reviewed before the end of the plan period is reached.

The Council considers comments raised in the Regulation 19 responses which directly refer to clarity regarding the plan period (Rep No.s 32 and 346) have been addressed in the above response.

- **2.3 Is the living locally concept (Policy 1) and spatial strategy (Policy 2) supported by robust and up to date evidence and otherwise soundly based?**

The Council's response to question 2.1 above sets the context for the national guidance and local context, including the London Plan, which justify the spatial strategy. This brings together the key aspects of the up to date evidence base. Policies 1 and 2 are strategic and overarching approaches that bring together elements of the whole Plan and therefore reinforce key priorities for the RLP and cross-reference to other policies.

Local living – or the idea that people should be able to meet their everyday needs within a short walk or cycle – has been gaining momentum in recent years both within the country and abroad. The Town & Country Planning Association¹ has identified features of a 20-minute neighbourhood as:

¹ TCPA 20-Minute Neighbourhoods www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf



As the concept reflects the elements of sustainable development it is considered to accord with the NPPF and the London Plan as set out at the start of this statement, linking together many long-established planning concepts such as the role of high streets, encouraging walking and cycling, healthy lifestyles and high-quality public realm. The GLA on behalf of the Mayor of London (Rep No. 55) consider it will reduce the need to use private cars and strengthen the role of town centres, fitting with the Good Growth objectives of the London Plan.

While the early Direction of Travel consultation was underway when the COVID-19 pandemic began, the draft Plan has been prepared during the challenging times which highlighted the importance of the value of local neighbourhoods as places to get essential goods and services, to relax and meet, to enjoy leisure time and to appreciate high quality open spaces. The Mayor of London set out a missions-based approach to restore confidence in the city, including the intent to ensure high streets for all. The Council's Corporate Plan (SD-092) commits to enabling 20-minute neighbourhoods, through the support in planning policies and also through improving community engagement in placemaking and improving the quality of scheme design. Many Council projects and communications are promoting the idea of 'liveable neighbourhoods'.

It is set out as a concept that underpins the entire Plan and incorporates the 20-minute neighbourhood concept. It seeks to increase convenience for residents by providing essential needs and services within an 800-metre catchment around the different centres. This will coincide with more opportunities to walk, cycle, and use public transport over car use.

Policy 1. Living Locally and the 20-minute neighbourhood is a new policy, setting out the overarching approach to achieve living locally, creating environments that focus on ease of active travel and access to public services, taking into account changing high streets and workplaces, and making it clear all development should contribute to the concept.

Following the public consultation on the Pre-Publication (Regulation 18) Local Plan, changes were made for clarity including considering inclusive access for different demographics, preserving land use patterns, how the 800m relates to the borough noting there are no fixed boundaries, and how developers are expected to comply with the policy.

In the responses to the Regulation 19 consultation, there was broad support for the Living Locally concept set out in Policy 1, including from some organisations with similar objectives and how particular sites can contribute. A number of comments received on the Regulation 19 Plan raised concerns about particular aspects of policy implementation including CPRE London (Rep No. 58) and Jon Rowles (Rep No. 65) on the definition of the 20-minutes. The emphasis in the RLP is that there is not a fixed geography to 20-minute neighbourhoods. Paragraph 4.12 in the Plan indicates that, as a guide, 400-metres is about 5-10 minutes on foot depending on ability. The Plan tries to take into account the Borough's existing demographics and development patterns, where the majority of the population live within 800m of a defined centre boundary as recognised in paragraph 4.13. The concept is set out as a starting point, not a rigid framework to be imposed on local communities or restrict development. Paragraph 4.16 in the supporting text to Policy 1 sets out how applicants are expected to address the concept in a planning application, from the early stages of a site assessment to understand the existing context and how a proposal will contribute to the criterion in part C of the policy, to ensure it is clear for a decision-maker to assess.

It is recognised that the distance travelled in 20 minutes will be different for everyone, and will vary according to the mode of travel. As an outer London borough, it is also recognised there will always be choice and diversity and people choosing to travel further for shopping, work, recreational and cultural needs. The 20-minute neighbourhood concept is intended to encourage the development of vibrant communities that enable residents to complete everyday tasks such as shopping and accessing essential services by foot, bike, or public transport. This is achieved by ensuring residents are within 20 minutes' walk from a town

centre, local centre, neighbourhood centre, or local shopping parade in line with Policies 17 and 18, or other smaller concentrations of local shops and services in line with Policy 20. It does not mean for example there needs to be an increase in large supermarkets or museums and theatres in the borough, rather a focus on being able to meet most of your day-to-day needs locally, and why the RLP seeks a mix of land uses are preserved in the borough to reduce the need for journeys.

The policy requires applicants to demonstrate how their development will contribute to improving walking and cycling links across the wider network including links to public transport and improving permeability through sites. The Council's ambitions are to increase the proportion of trips undertaken in the borough by walking, cycling and public transport, through delivery of a safer, greener, more attractive and better connected borough. The Council has published an Active Travel Strategy (SD099) and Richmond Public Health has introduced a Physical Activity Plan 2021-2031² which both seek to increase physical activity in the borough. As noted in the supporting text to Policy 1 at paragraph 4.14 "*There is a correlation between areas with low active travel levels and areas with both lower levels of public transport accessibility and higher levels of health deprivation and disability. There are pockets of relative deprivation around Castelnau, Ham, Hampton Nursery Lands, Heathfield, Mortlake and Whitton*". While Policy 47.C ensures developments provide a high quality walking and cycling environment within the curtilage of the development and in its near vicinity, part C.6 goes further and seeks major residential developments demonstrate improvements in areas with lower levels of public transport accessibility or higher levels of deprivation and disability. A modification is proposed to add reference to the Mayor's Vision Zero Strategy for road safety at paragraph 4.8 in the supporting text, as agreed in the Statement of Common Ground with TfL (SOCG-03) and set out in LBR-002 and the table at the end of this statement (P1.2).

In terms of accessibility for all, comments from The Richmond Society (Rep No. 68) and Jon Rowles (Rep No. 65) raise concern about provision for those less mobile. The RLP recognises that there are people with different abilities and emphasis is on inclusive mobility and inclusive design. Policy 1 does emphasise walking and cycling because active travel is a priority, but also emphasises facilitating exercise to quality public transport and overcoming barriers for people who experience reduced mobility. Paragraph 4.9 in the supporting text to Policy 1 recognises that not all are able to walk or cycle. The text details some of the ways that considered interventions could be secured through Policy 1 for people with reduced

² Richmond Public Health Physical Activity Plan 2021-2031 Executive Summary
www.richmond.gov.uk/media/23243/richmond_public_health_physical_activity_plan_2021_2031.pdf

mobility, as this was added in the Publication (Regulation 19) Plan (SD-001) in response to the issue being raised in the Regulation 18 comments.

A modification is proposed to remove the “information note for the Publication consultation” following Policy 1, as set out in LBR-002 and the table at the end of this statement. The Council is aware there has been controversy around the concept of 20-minute neighbourhoods, and a number of comments received on the Regulation 19 Plan expressed concerns about restrictions on movement and the consultation on this policy (Rep No.s 1, 54, 66, 67). Any such restrictions are beyond the remit of the Local Plan and are not what the policy seeks to do. It is merely seeking to bring about a pattern of development that makes it an easy choice to 'live locally' and aims to improve, not restrict, accessibility and movement.

Policy 2. Spatial Strategy: Managing change in the borough is a new policy setting out the continued spatial strategy directing higher density development to sites in the town centres or well-connected places, prioritising previously developed land. It recognises the climate emergency and biodiversity crisis, and the need to deliver growth in a sustainable way. The emphasis is on promoting green infrastructure and mitigating the impacts of climate change and protecting, and where possible enhancing, the borough’s environment, local character and heritage assets. The supporting text details the evidence base around future needs and the borough’s constraints and capacity for growth. It is followed by the Key Diagram.

The Council’s response to question 2.1 above already sets out details in relation to the spatial strategy, including the evidence and policy context for it. In the responses to the Regulation 19 consultation, there were a few comments on specific aspects of Policy 2 and the spatial strategy, along with some support. Through the Duty to Cooperate, there have not been any representations to suggest an alternative approach, and broad support from Elmbridge Borough Council (Rep No. 64), the London Borough of Hounslow (Rep No. 20), and the GLA on behalf of the Mayor of London (Rep No. 55). The Council has reviewed the details in the representations received and have set out detailed comments within the Schedule of responses to the Publication Local Plan (Regulation 19) consultation (in plan order) with the Council’s response (January 2024) (SD-014). No modifications have been suggested to the policy.

Table of Proposed Modifications

Details taken from the Schedule of Proposed Modifications suggested by the Council (May 2024) (LBR-002).

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
				Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy)
P1.1	n/a	19	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy), Information box	Remove the information note box following Policy 1, which was included for the Publication consultation only. Information note for the Publication consultation: this policy is not about limiting movement. There are some concerns expressed that this concept, along with traffic measures, would restrict journeys. Any such restrictions are beyond the remit of the Local Plan and are not what the policy seeks to do. It is merely seeking to bring about a pattern of development that makes it an easy choice to 'live locally' and aims to improve, not restrict, accessibility and movement.
P1.2	Transport for London (TfL) (comment 11)	20	Policy 1 Living Locally and the 20-minute neighbourhood (Strategic Policy), Paragraph 4.8	[See also Statement of Common Ground with TfL (signed 28/02/2024) (SOCG-03)] To add reference to the Mayor's Vision Zero Strategy for road safety, as measures may form part of development proposals and associated highways improvements: The 'living locally' concept relies on inclusive and attractive high streets and public spaces, promoting and encouraging walking, cycling and accessibility for all; this complements the Mayor's Healthy Streets approach as set out in TP2 Policy T2 of the London Plan. It should also reflect the Mayor's Vision Zero which seeks to reduce road danger and create a safer transport environment for all.
				Policy 2 Spatial Strategy: Managing change in the borough (Strategic Policy)
P2.1	n/a	23	Policy 2 Spatial Strategy: Managing change in the borough (Strategic	To correct an error and reflect the Local Housing Needs Assessment (2023 update) (SD-056), update the supporting text:

Change Ref.	Response Ref(s)	Page	Section of the Plan	Proposed Modification
			Policy), Paragraph 4.19	It identifies for affordable rent a need for 1,123 affordable homes per annum across the borough, and a need for 552 284 affordable homes per annum for affordable home ownership ...
P2.2	n/a	23	Policy 2 Spatial Strategy: Managing change in the borough (Strategic Policy), Paragraph 4.19	Update the supporting text to reference the Retail & Leisure Needs Study – Update Addendum (April 2024) (PSED-02): <i>Retail needs:</i> Richmond upon Thames Retail & Leisure Study (Phase 2) forecasts that up to 2034, there is an over-supply of 2,900 sqm gross of retail floorspace, and an undersupply of food/beverage floorspace of approximately 5,400 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,500 sqm gross. <u>An Addendum (April 2024) confirms up to 2034 an over-supply of approximately 3,000 sqm gross of retail floorspace is forecast, and an under-supply of food/beverage floorspace of approximately 5,500 sqm. Therefore, by 2034 there is a combined under-supply of approximately 2,400 sqm gross.</u> Put simply, the need for shopping space is forecast to decrease but the need to provide space for the food & beverage sector and potentially the wider leisure sector is increasing.
Further Proposed Modifications				
FP.2	n/a	13	Local Plan Strategic Vision	To update terminology in Plan. In second paragraph amend first sentence as follows: All of the borough's <u>main town</u> centres have capitalised on how much they are enjoyed by those living in the local area, as well as providing a wider offer attracting visitors.
FP.3	n/a	13	Local Plan Strategic Vision	To update terminology in the Plan. In third paragraph amend third sentence as follows: Office space in our <u>main town</u> centres has adapted and local hubs provide space to work,