

Sadiq Khan
The Mayor of London
City Hall
The Queen's Walk
London
SE1 2AA

8th December 2016

Dear Sadiq

Re: London Borough of Richmond upon Thames' response to the London Mayor's consultation 'A City for all Londoners'

I welcome the chance to respond to your recent consultation and to set out the position of London Borough of Richmond upon Thames. A detailed response follows, but I wanted to draw attention to some specific concerns.

A good London Plan should recognise and respect the contributions each borough, and their distinctive neighborhoods, can play in delivering sustainable growth. Richmond is home to simply outstanding open spaces, and endowed with world-famous heritage sites; key ingredients that enhance the quality of life of Londoners across our City.

Your plan needs to recognise that not all areas are suitable for densification unless you are proposing we irreversibly damage the local character of our historic neighbourhoods. This is particularly true of the distinctive historic and cultural environment of Richmond's villages.

All development must also be sensitive to the quality of the natural and built environment and high density need not mean high rise. I deeply regret the failure of the GLA to protect the centuries old view of St Paul's Cathedral from Richmond Park in contravention to the London Plan.

— This is a great pity —

I accept that sustainable development is a delicate balancing act between competing interests for land. As Mayor you must avoid prioritising housing at the expense of economic growth. I am extremely troubled by the loss of 30% of business floorspace in Richmond since the introduction of office to residential Permitted Development Rights. I would call on you to act now to halt this deeply damaging trend by supporting the extension of the exemption area beyond the CAZ.

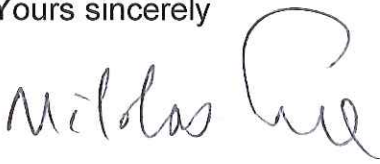
I am also very disappointed that other public sector land holders seem to apply an automatic presumption in favour of conversion to residential and sale without consideration of local communities. Richmond continue to press for Councils to be empowered to direct the use of publicly owned land in their local areas.

Sustainable growth means that infrastructure should take priority – not as an afterthought. Schools, health services, transportation, leisure facilities and open space are all essential components of a thriving community. Centrally dictated housing targets should not overrule locally and democratically determined needs and aspirations. Richmond Council will strongly resist pressure to give up a site earmarked for necessary school places to instead provide additional housing units.

Richmond's position is that sustainable growth can only have a basis in local democratic determination. There is a practical incentive as well as a moral imperative here. It will be much easier to secure development with local consent, rather than swimming against a tide of opposition.

I note there are numerous other GLA consultations currently underway and the Council intends to respond to each of these fully.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Lord True', with a large, stylized initial 'L'.

Lord True
Leader, London Borough of Richmond upon Thames

Richmond Council's Response to "A City for All Londoners"

Accommodating Growth:

1. The Mayor must recognise that sustainable communities are dependent on local consent and that the scale of development envisaged requires a local mandate. It is easier to secure development with consent, than without it. The Council welcomes debate about the housing, social and financial policies required to grow in a sustainable way, but remains convinced that these policies must reflect local democratic determination.
2. The Council supports the recognition of competing needs for land in London, including for green space, retention of office and commercial space and infrastructure of all kinds. In Richmond borough, with limited land supply it is vital not to forget, in the drive to significantly increase housing delivery, all the infrastructure required to support new housing, including schools, education, health facilities etc. and the overall need to achieve a balance between housing and economic growth/jobs, to deliver the good and sustainable growth envisaged.
3. Housing also needs to be sited where infrastructure and land capacity is available, or can be easily developed (e.g. new roads and transport links) and does not significantly and adversely affect the character of London's unique neighbourhoods, particularly the quality and character of public services and the built environment. The Mayor should not follow the previous government's mistake of prioritising housing over economic growth and development needs, and the focus should be on setting the balance between residential and commercial development in order to ensure London and boroughs have a good balance of homes and jobs as well as other social and community infrastructure that is required to support the growth.
4. The provision for employment land across the city, including that the Mayor will promote viable strategic locations for office space, including in Outer London, is strongly supported by the Council. The loss of office space for small businesses, start-ups and entrepreneurs has become a serious issue. The role of Outer London is to act as a destination, not just to serve inner London. We recommend that the Mayor should focus even more on the role of Outer London in not only providing homes for Londoners to live, but crucially offering employment opportunities, jobs and places for businesses to start-up and grow.
5. Many people commute from Outer London to Central London, and there is a danger that Central London will become even more of a focus point for its role in providing jobs, thus creating more commuting and transport pressures. In addition, Outer London and particularly south / west London have not seen improvements in orbital transport links and connections compared to other parts of London. In order to support a thriving economy in south / west London, urgent investment in transport infrastructure is required to enable better linkages with people and jobs within Outer London. Huge economic damage is done by congestion which all too often results from poorly co-ordinated road-works on town centre roads.

6. The need to focus intensification around stations and well connected town centres, with more mixed use development, is recognised, however this must be pragmatic as in some locations it may not be feasible for housing and industrial and commercial activity to co-exist as this will put pressure on amenities and in the long term threaten the viability of economic uses. In outer London, a “town centre” may be a small community or space in a primarily residential area.
7. The South London Partnership (SLP) is a sub-regional collaboration of five London boroughs: Croydon, Kingston upon Thames, Merton, Richmond upon Thames and Sutton. The partnership focuses on shaping sustainable growth, securing devolution to unlock opportunities and driving efficiency. One of the SLP’s key priorities is to address constraints and enhance the economic potential of South London on the national and world stage by:
 - developing a programme for economic growth, which involves bringing together the key tech, health sciences, research and education providers;
 - seeking devolution of skills commissioning to enable us to better meet business needs and strengthen the pathways through education and learning into jobs;
 - securing investment in transport infrastructure and improvements in services to address existing congestion, link workers to jobs, and maximise the potential of our location;
 - establishing new ways of working with the business sector to maximise the potential of sub-regional growth sectors and to attract inward investment and tourism;
 - protecting and enhancing land for jobs, while securing affordable housing to support our growing economy.

These reflect the priorities which Richmond Council believes will have the most significant impact on economic growth and sustainable development at the sub-regional level.

8. It must be recognised that Richmond Council places strong emphasis on protecting and, where possible, enhancing the special environment, local character and uniqueness of this borough by recognising the environmental constraints and limits that provide the context for growth in the borough and which need to be respected. This position is reinforced in the Council’s plans and policies which provide a robust and evidence based approach to change and improvement. In Richmond borough, the emphasis is on meeting local community needs, including delivery of housing and the infrastructure and jobs required to support it, without compromising the quality of the natural and built environment. Different parts of London will have different roles to play in accommodating future growth. In this context, it needs to be acknowledged that Richmond borough’s parks and open spaces provide not only recreational opportunities for those that live and work in this borough, but also for local communities and residents in neighbouring and other London boroughs, thus providing a green lung for southwest London. We believe there are opportunities for better co-ordination between the managers of green space.
9. The Mayor’s vision to contain most growth within London, but also wanting to agree joint investment corridors that stretch out beyond London’s borders through close collaboration with neighbouring authorities in the Wider South East is

supported by the Council, to assist Outer London Borough's in their Duty to Cooperate role. In this context, it should be noted that Richmond Council would not support the relocation of industrial or employment uses beyond London if the purpose was to free up land within this borough for housing. Nor should the onus to free up land for housing be solely on London boroughs. Areas outside of London's boundary have a major role to play. The Mayor should work with boroughs outside of London to ensure they can support the delivery of housing targets, given that they also benefit from London's growth.

10. Crossrail 2 would serve the borough and the Council supports the overall project. However, it has a more limited impact in terms of additional services and faster journeys, using existing rail infrastructure. It is therefore considered to offer more limited potential for housing growth along its alignment.
11. The Council recognises that there are limits to the extent to which London can grow. This should also be re-assessed in light of the "Brexit" vote. Unlimited and unsustainable growth would irreversibly change the character of many parts of London. Growth must underpinned by supporting policies. The Mayor should also be looking at the factors which are driving demand.

Education:

12. The Vision does not properly address school places. The publication states, on page 28, that, "In particular, I want to make sure we have enough school places in London – by 2025, we will need an additional 105,000 secondary-school places and 60,000 new primary places." Those figures appear absurdly high. London Councils' latest pan-London work on the need for further secondary school places states that 443 forms of entry, equating to 13,290 places, are needed by 2023, but that 15 of the 32 London boroughs already have plans in place to provide their quota of that overall total and seven boroughs are forecasting an oversupply of places by 2023. The primary figure also looks much too high, as nearly all the short- to medium-term need for primary places has already been met. The Vision should provide an estimate of how many additional places will be needed between 2025 and 2041, by when, according to page 19, the population of London, "... is set to reach 10.5 million by 2041, with an average increase of almost 44,000 households each year". As a minimum the GLA could scale up the need based upon the projected population number. In some cases where there is limited land available, as in Richmond, the GLA must not impose housing at the expense of school places. For example, Richmond aims to take advantage of the development of the Stag Brewery site to enable an additional secondary school in the borough which is needed to meet projected demand in that area by 2019. It would be regrettable if these identified needs could not be met because of pressure to meet housing targets.

Housing:

13. The Vision recognises the need to identify land in the capital to build at least 50,000 homes per annum, however there should be recognition that there is a need in some areas to plan for a balanced approach to different land uses and it may not be possible to accommodate higher levels of housing growth within London's boundary alone. This approach would be a false premise given development opportunities that are available just beyond London's administrative boundaries.
14. In some areas the scarcity of public land, and pressure for other infrastructure such as education, community and health facilities, mean that it will not always be appropriate to redevelop for residential schemes. Richmond Council is deeply concerned that many public sector bodies, such as health trusts or the Ministry of Defence, seem to apply an automatic presumption to convert and redevelop their land for residential purposes in order to capitalise on the high value residential returns they are able to achieve in this borough, which they seem to think is justified by investing the receipt of funding (which is often centralised) for broader purposes that will not address local priority needs for housing or improved services. Whilst it is recognised that this approach could provide for new housing, it completely undermines the Borough's policy and plan-led approach, which ensures that when sites are released, alternative employment generating uses such as education, nurseries, leisure, training and other social infrastructure uses are given priority and considered. Without this provision (and bearing in mind the high value of housing) these types of uses, of which there is a great need in the borough and which serve the local community, could not be provided. Councils should be able to challenge other public sector bodies with land interests, such as Network Rail, NHS England and central government to release more developable land and tackle the issue of sites either being hoarded and lying dormant or being sold off without consideration of impact on or benefit to local communities. We will be pressing for this power again when the Housing & Planning White Paper is published.
15. The Council acknowledges there will be opportunities for development to come forward by optimising the use of sites, particularly in centres with good public transport accessibility that would be along transport corridors or around transport nodes. However, expectations need to be realistic; this borough has a very limited land supply, and due to the special context and local character, there will be some areas in this borough where this will not deliver significant growth.
16. The need to promote a variety of tenures, including low cost rent to meet a range of needs, is strongly supported by the Council. However, the Council remains concerned about the affordability of products in high value areas.
17. Whilst it is accepted that there should be an aspiration to build more homes and more affordable homes the Council is not at this point persuaded that there are the resources or opportunities in the short to medium term to meet this aspiration. To move toward increased levels of development must recognise current land ownerships and what can be viably delivered through the pipeline, grant levels to support affordable development and delivery within the context of achieving

quality and sustainable development. The dynamic changes required to deliver 50K homes for London are not within the Mayors gift and as identified above would require collaboration with other south east boroughs and regions. Also on past track record 50% affordable homes with the grant levels available is not realistic.

Public Health:

18. The Council welcomes the Mayor's focus on health inequalities and environmental solutions to health problems. Ensuring the healthy choice is the easy choice stands to help prevent disease and the development of long-term health conditions, which in turn can reduce the burden on local health and care services. These universal approaches offer more cost-effective alternatives to one-to-one service level interventions.

Crime:

19. We will respond to the consultation on the Police and Crime plan in appropriate detail. However, it will be important to ensure that specific crime issues which are currently priorities in their own right (such as burglary and vehicle crime) are built explicitly into the work of the proposed neighbourhood policing teams. We would emphasise our concern at any emerging proposals which suggest a shift of MOPAC resources away from the borough. We would also stress that the emerging proposals on MPS reorganisation must not weaken borough interest and local accountability.

Economy:

20. The Council supports the protection of land used for employment and local determination of permitted development rights. The Council's emerging Local Plan is taking a stronger approach to employment land, due to the significant potential loss of 30% of B1 floorspace through office to residential Permitted Development Rights (PDR) since the introduction of the PDR in May 2013, and will be seeking to opt out of the forthcoming demolition permitted development rights due to serious concerns about its impact.
21. Resisting the conversion of offices to housing should apply to the whole of London, or as a minimum to those boroughs that have already experienced significant losses since the introduction of the PDR. Therefore, the Mayor should go further and promote an extension to the 'exemption area' beyond the CAZ. The PDR affects a lot of offices that have relatively small floorplates, thus significantly impacting on SMEs, which make up a large percentage of the firms in the borough. As a consequence, many businesses are being forced out of premises, either as a direct result of a PDR or through increased rents, with the latter also preventing businesses from locating in the borough and being able to start-up a new businesses.

22. The Mayor's intention to encourage small and medium-sized businesses is supported. The provision of small units, affordable units and flexible workspace such as co-working space is encouraged in the Council's emerging Local Plan.

Skills/careers:

23. We welcome recognition of the importance of skills and careers to underpin a wider economic development strategy. The potential devolution of these functions and budgets offers the opportunity to better align them with business/employer needs and make them more relevant to today's economy. In a city and economy as vast and complex as London's, it is important that local government is fully involved in this process. Local borough councils can provide the detailed intelligence and insight to reflect employer requirements and learner/job seeker needs so that the skills system can better deliver for all parts of the community. Locally, our partnership with Richmond College has been hugely successful in developing a new education and enterprise campus which will benefit the whole borough - providing state of the art new facilities for Richmond College, a new secondary school and new buildings for an existing SEN school. A newly devolved skills and careers system will need to provide clarity regarding roles and responsibilities to ensure the potential benefits are fully realised.

Environment and Transport:

24. The Council welcomes the Mayor's measures to help improve air quality, given the need to address exceedances of poor air quality in parts of the borough. Richmond Council supports in principle the Mayor's Emissions Surcharge, investment in public transport, walking and cycling, lobbying for a diesel scrappage scheme and help for SME's to purchase low emission vehicles. The Council also supports a London-wide ULEZ for lorries, buses and coaches. More detail is needed on the likely impacts of extending the ULEZ to the south circular. In particular the Council is concerned about the potential knock-on impact of polluting vehicles using Satnav to evade the ULEZ and instead use neighbouring smaller residential roads in Richmond, resulting in worse air quality around the zone's fringes because these roads aren't designed to maximise through traffic flow. The Council supports the Mayor to promote good air quality through design and new technologies, and in particular encourages him to promote 'Air Quality Neutral/Air Quality Positive' for new developments.
25. The recognition of the need for reliable roads should also address provision for car parking in support of new developments with the aim of minimising the impact of car based travel while also contributing towards a safe road network without exacerbating existing on street parking pressures. The maximum parking standards do not currently reflect the realities of life in outer London and outer London boroughs should be given the flexibility to set their own minimum or maximum car parking levels as appropriate to local conditions. The Council strongly advocates a fair and non-penal approach to parking which is vital to economy of outer London town centres and growth of local businesses.

26. The Council strongly supports the Mayor taking forward a new policy to protect existing residents and the local environment from the construction of 'mega basements' in residential areas. It should however be acknowledged that smaller basement extensions, particularly within existing residential areas and especially within rows of terraced housing, are of equal concern to local residents as 'mega basements'. In parts of the borough, particularly Barnes and Kew, some residents are concerned about the impacts of basement and subterranean developments. The Council has already taken steps to manage their impacts, such as requiring Construction Management Statements to be submitted with all types of basement development. The vast majority of basement developments in this borough relate to new, or extensions to existing basements, under existing dwellings within established residential areas. The Mayor should acknowledge that the addition of basements to existing properties will exacerbate the issue of rising residential land and property values, thus creating even more homes that are not affordable for local communities, and it also contributes to the loss of small family dwellings. Multiple basements in a residential street or area can also significantly change the character as well as the social dynamics of an area, and can cause significant impacts to living conditions of residents in neighbouring properties. A policy that is seeking to restrict the size and extent of basements is included in the emerging Local Plan. In addition, the Council is currently considering its options for making an Article 4 Direction in relation to basement developments.
27. The Council welcomes the recognition that higher density does not necessarily mean high rise and that tall buildings will only be permitted if they can add value to the existing community. We therefore deeply regret the GLA's failure to protect the view of St Paul's Cathedral by granting planning permission for a 42-storey tower which destroys the historic view from King Henry's Mound in Richmond Park, in contravention of the London Plan and London View Management Framework. Richmond is characterised primarily by low to medium-rise residential development patterns, which has produced very attractive townscapes, which are important to the borough's distinctive character. Therefore, whilst the Council would accept higher densities, where appropriate, there is an expectation that this will be delivered without recourse to tall buildings. Richmond Council would encourage the Mayor to clearly set out his approach to tall buildings.
28. The recognition that development must not diminish the city's historic environment and protected heritage assets is strongly supported, with the reference to world-famous landmarks in places like Richmond.

Reducing inequalities, increasing opportunity, affordability and fairness:

29. The Council supports the recognition of delivering good growth for all Londoners and the balance to address the needs of existing residents as well as planning for population growth.