

Statement of Common Ground Between

London Borough of Richmond upon Thames and Surrey County Council

Planning

7 February 2024

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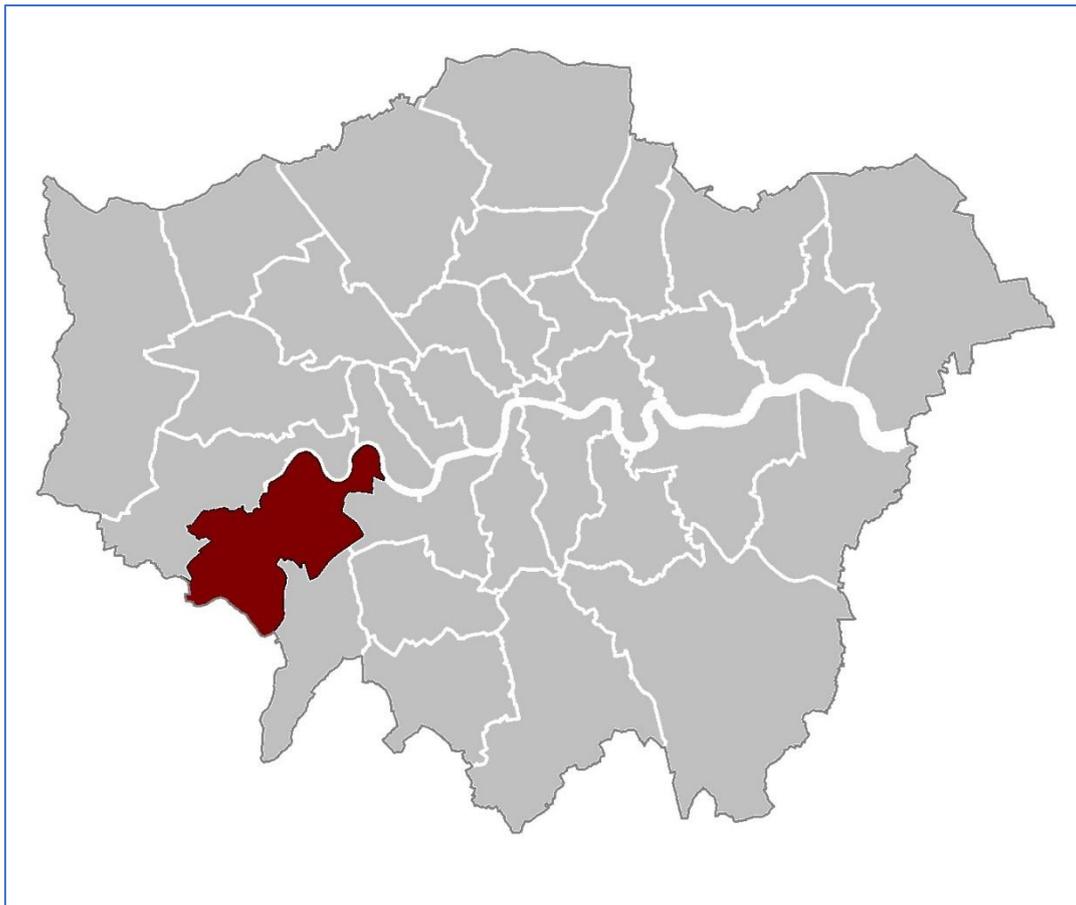
1. Introduction

1.1 Surrey County Council formally responded to the Publication Local Plan consultation on Friday 20 July 2023. This Statement of Common Ground (SoCG) sets out the areas of agreement between the London Borough of Richmond upon Thames and Surrey County Council and the areas where agreement has not been reached on key strategic matters. Where appropriate it proposes resulting minor modifications to the Publication Local Plan as submitted for independent examination in public, put forward for consideration during the Examination. These minor modifications are acceptable to and have been agreed by both parties where indicated, and updates to this document will be agreed as matters progress and agreement is reached on any outstanding issues.

2. Strategic Context

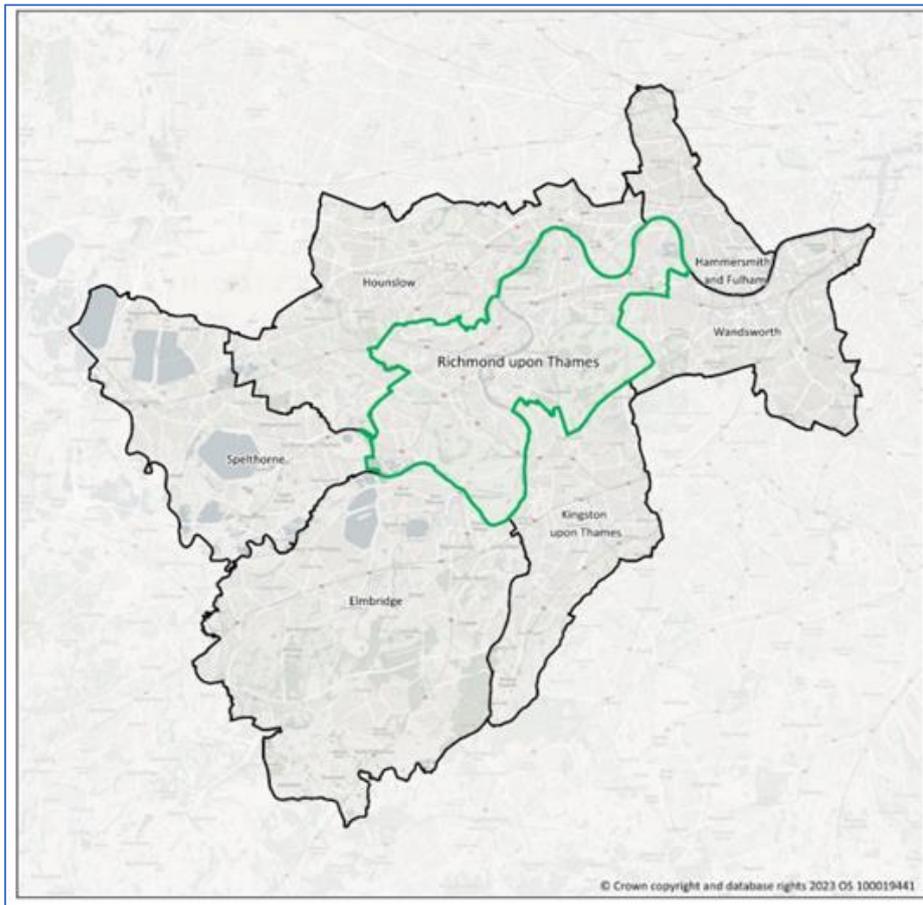
2.1 Statements of Common Ground should be read in conjunction with the [Duty to Cooperate Statement \(January 2024\)](#) for the Richmond Local Plan which includes information on strategic matters and context, plan preparation to date and how the Council has cooperated with neighbouring boroughs and other bodies during the preparation of the Local Plan through engagement activities.

2.2 In terms of geographical context, Richmond upon Thames is an outer London borough sitting to the southwest of Greater London, one of 32 boroughs plus the Corporation of London (City).



2.3 Richmond upon Thames is the only London borough on both sides of the River Thames and is bordered by the **London Boroughs of Hounslow, Wandsworth, Hammersmith & Fulham** and

the **Royal Borough of Kingston upon Thames**. In addition, Richmond shares its boundaries with **Elmbridge** and **Spelthorne Borough Councils** which are within **Surrey County Council**.



2.4 The county of Surrey stretches much further to the west, but the two districts bordering the borough are Elmbridge and Spelthorne which share some of the characteristics with Greater London. The boundaries and connections are often related to transport infrastructure routes and rivers which connect the boroughs.

2.5 Surrey County Council is responsible for strategic functions and services such as education, highways and social care. There is a two tier system of local government in Surrey with eleven district and borough councils, including Elmbridge and Spelthorne, who provide more local services, with some functions shared between SCC and the districts and boroughs. Each borough and district within Surrey produce its own Local Plan and other development plan documents. SCC, as the Minerals and Waste Planning Authority, produces minerals and waste plans.

3. Parties Involved

3.1 This SoCG has been prepared by the London Borough of Richmond upon Thames in agreement with Surrey County Council. It addresses strategic spatial policies to be addressed directly by collaboration with Surrey County Council. The Council is engaged with them on strategic matters on an on-going basis.

3.2 Both Councils are committed to ongoing liaison to fulfil the duty to cooperate, utilising the appropriate governance arrangements - informally at officer level and escalation to Member level where necessary.

4. Signatories

4.1 London Borough of Richmond upon Thames agrees to matters referred to in this document which directly impact them.

Signed:



Name: Adam Hutchings

Position: Spatial Planning and Design Team Manager

Date: 07/02/2024

Surrey County Council agree to matters referred to in this document which directly impact them.

Signed:



Name: Caroline Smith

Position: Planning Group Manager

Date: 07/02/2024

5. Strategic Matters

Duty to Cooperate

- 5.1 Duty to Cooperate activities between the London Borough of Richmond upon Thames and Surrey County Council are recorded in the Council's Duty to Cooperate Statements – the [Duty to Cooperate Statement \(June 2023\)](#) was produced to accompany the Regulation 19 consultation and an [updated Duty to Cooperate Statement \(January 2024\)](#) records all the activities undertaken as part of the Publication (Regulation 19) stage and prior to submission of the Local Plan
- 5.2 Matters not specifically addressed within this Statement of Common Ground are discussed within the above documents and both authorities agree that the above documents are an accurate record of their engagement activities and that there are no other unresolved issues.

Key Strategic Matters

- 5.3 Through correspondence and discussions between LBRuT and SSC, strategic matters of waste management, and the approach to rivers and flooding has been considered, along with some key issues such as transport and education which can be cross-boundary.
- 5.4 With regard to waste management, it was noted that the review of the West London Waste Plan is commencing and officers will continue to liaise.
- 5.5 Following on from the Regulation 19 comments raised, including through the Duty to Cooperate process, there was progress on the Council's preparation of a series of draft background topic papers to draw together information particularly in areas where comments have been raised. The papers were shared with the relevant Duty to Cooperate bodies, to request any feedback particularly if there was missing or insufficient detail. The Council shared a draft of the Transport Background Topic Papers with Surrey County Council on 28 November 2023. The Transport Paper sets out the Council's assessment that, as per previous Local Plans, development will have no strategic impact on transport or highways outside the borough and there is nothing unconventional about the policies and site allocations within the emerging Local Plan. The paper brings together some additional information, drawing on the baseline conditions and broader context, including other measures, and using modelling of trip generation forecasts.
- 5.6 Surrey County Council responded on 7 December with comments on the Transport Background Topic Paper. The comments received have informed this Statement of Common Ground, see further details in the table below. An updated Transport Background Topic Paper has been submitted with the Local Plan.
- 5.7 The importance of the River Thames Scheme and the flood alleviation measures was also noted, and the Council has responded to comments raised, also by the River Thames Scheme, to add further details in a proposed modification to the Plan and in the Infrastructure Delivery Plan Addendum, see further details in the table below.

6. Table of representations, Council's response and progress towards addressing strategic cross-boundary issues

Text proposed to be **inserted** shown by underlining in blue highlight. Text proposed to be **removed** highlighted in ~~strikethrough~~.

The following table details the matters raised by Surrey County Council as representations to the Regulation 19 Richmond Local Plan (Publication Plan), and the status of those representations. As documented in the Duty to Cooperate Statement (January 2024) and noted below, the Council has drawn together information in a series of background topic papers. A draft paper on Transport was shared with Duty to Cooperate bodies including Surrey County Council.

The table seeks to provide clarification and clarity to the extent to which matters raised by the Surrey Council are resolved or remain unresolved. The table therefore represents the current agreed position in respect of the agreements and differences between the Council and Surrey County Council.

Section / Policy	Rep No.	Surrey County Council Representation	Council's Response (including any proposed modifications)	Background Paper ref	Common Ground Agreed?
Site Allocation 12 The Stoop (Harlequins Rugby Football Club), Twickenham	200	<p>Thank you for consulting Surrey County Council (SCC) on the Regulation 19 version of the Richmond Local Plan. This is an officer response, and our comments are set out below in relation to the council's role as the responsible authority for highways and transport, minerals and waste and as Lead Local Flood Authority.</p> <p>[See comments 330, 334, and 527 in relation to highways and transport, minerals and waste planning, and flooding]</p> <p>Lastly, in respect of proposed Site Allocation 12 – The Stoop, Twickenham; SCC would advise that the London Borough of Richmond upon Thames carefully consider the implications of the proposed allocation (and any future development pursuant to that allocation) on the continued operation of the existing Twickenham Depot, Langhorn Drive, Twickenham which is safeguarded as Site 342 for waste management purposes by the West London Waste Plan 2015. In this regard paragraph 187 of the National Planning Policy Framework 2021 and the 'agent of change' principle is also relevant.</p>	Comments noted. It is noted in the neighbour context that the adjacent Depot is a safeguarded waste site.	n/a	Agreed in relation to noting the safeguarded waste site adjacent to Site Allocation 12.
Policy 7 Waste and the Circular Economy	330	<p>Minerals and Waste Planning</p> <p>SCC welcomes the approach to waste management in the Richmond Local Plan and its emphasis on providing for a circular economy (paragraphs 16.44 to 16.53).</p>	Comment noted. The waste hierarchy is mentioned in the supporting text for Policy 7 with regards to Circular Economy Statements, requiring applicants to detail how and where the waste will be managed in accordance with the waste hierarchy. Further references are not	n/a	On-going in relation to references to the waste hierarchy and applications for non-waste development in the context of sustainable waste management.

Section / Policy	Rep No.	Surrey County Council Representation	Council's Response (including any proposed modifications)	Background Paper ref	Common Ground Agreed?
(Strategic Policy)		<p>[See also comment 200 in relation to Site Allocation 12]</p> <p>Policy 7 seeks to minimise the amount of waste managed by way of disposal and contribute towards the borough being more self sufficient in managing its waste. However, SCC would suggest that reference is made in Policy 7 to the Waste Hierarchy.</p> <p>It may also be helpful to reference paragraph 8 of the National Planning Policy for Waste 2014 (NPPW) relevant to Policy 7. This explains how the London Borough of Richmond upon Thames should determine applications for non-waste development in the context of sustainable waste management. Paragraph 4 of Policy 7 does not provide certainty in this regard particularly in respect of the statement that "developments that are likely to generate large amounts of waste, are required to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials". Paragraph 8 of the NPPW explains that for all non-waste development the London Borough of Richmond upon Thames should ensure that "the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities and minimises off-site disposal."</p>	<p>deemed necessary as references are made in Policies SI 7, 8 & 9 of the London Plan and within the Strategic Objectives, Vision and in multiple policies of the West London Waste Plan. Both the London Plan and the West London Waste Plan form part of the Development Plan in the Borough.</p> <p>Comment noted. Policy 53 details when a Construction Management Plan will be required: for all major developments, any basement and subterranean developments, developments of sites in confined location or near sensitive receptors or if substantial demolition/excavation works are proposed. Therefore, explicit reference to the National Planning Policy for Waste is not deemed necessary.</p>		
Policy 8 Flood Risk and Sustainable Drainage (Strategic Policy)	334	<p>Flooding</p> <p>We support part 14 of policy 8 which states that applicants will have to demonstrate that their proposals take into account the River Thames Scheme and demonstrate how the current and future requirements for flood defences have been incorporated into the development. We also note the references to the River Thames Scheme in the Infrastructure Delivery Plan. Surrey County Council is joint applicant with the Environment Agency for the River Thames Scheme. This is a Development Consent Order scheme to reduce flood risk in communities and includes new control gates being installed at the existing weirs at Sunbury in Elmbridge Borough, Molesey in Elmbridge Borough/the London Borough of Richmond and Teddington in the London</p>	<p>Comments noted. Policy 8's length reflects the complexity of the issues covered.</p> <p>An Additional Modification could be considered to add further references to the River Thames Scheme, as a new paragraph 16.84.</p> <p><i>[Note comments also received from the River Thames Scheme - a map of the RTS scheme is now added to the IDP Addendum]</i></p> <p>Suggested modification: Add a new paragraph (after paragraph 16.83) under sub title 'Flood defences':</p>	n/a	<p>On-going in relation to the level of detail within Policy 8.</p> <p>Agreed in relation to reference to the River Thames scheme.</p>

Section / Policy	Rep No.	Surrey County Council Representation	Council's Response (including any proposed modifications)	Background Paper ref	Common Ground Agreed?
		<p>Borough of Richmond. The River Thames Scheme will be making their own representation.</p> <p>We would suggest that policy 8: flood risk and sustainable drainage could be shortened and made more concise through using links and references to the NPPF. We would suggest that further reference is made to the River Thames Scheme in the supporting text for policy 8.</p>	<p><u>The Council supports proposals for strategic flood alleviation measures (and associated enabling works), including the emerging flood alleviation measures at Teddington and Molesey weirs, as part of the wider River Thames Scheme. The project is designed to significantly reduce the risk of flooding by creating a new river channel in two sections alongside the Thames in Runnymede and Spelthorne, as well as increasing capacity at Sunbury, Molesey and Teddington weirs. These proposed works will increase the capacity of the Thames through Surrey and south west London, reducing the risk of flooding.</u></p>		
Policy 47 Sustainable Travel Choices (Strategic Policy)	527	<p>Highways and Transport</p> <p>Where there are likely to be cross boundary impacts of development proposals in the Richmond Local Plan on Surrey's transport network, we consider that these impacts would need to be assessed and appropriate measures identified to resolve them. We would also add that where development in Richmond impacts Surrey's infrastructure and requires mitigation measures, this must be implemented and funded by developers.</p>	<p>Comments noted.</p> <p>A draft of the Transport Background Topic Paper was shared with Surrey County Council on 28 November 2023.</p>	Transport	<p>Surrey County Council responded with comments on the draft Background Topic Paper on 7 December 2023.</p> <p><i>Thank you for the opportunity to comment on the Transport Statement background paper. Having reviewed the document SCC consider it is comprehensive and do not have any additional points to make. From the perspective of the strategic highway impact that the London Borough of Richmond upon Thames emerging Local Plan might have on Surrey, we agree with the comment within the table on page 10 i.e. no impact on the strategic highway network in Surrey.</i></p> <p>Agreed that there is unlikely to be any traffic impacts on the highway network in Surrey.</p> <p>On-going in relation to continued assessment of transport impacts, as it is expected to be a matter discussed at Examination including with other respondents.</p>