

Duty to Cooperate Statement Richmond Local Plan

Planning

18 January 2024



Contents

1. Introduction	2
2. Context	2
3. Richmond’s new Local Plan	8
4. Direction of Travel Consultation: 24 February 2020 - 5 April 2020	9
5. Pre-publication Consultation (Regulation 18): 10 December 2021 - 31 January 2022.....	10
6. Publication Consultation (Regulation 19): 9 June to 24 July 2023	11
7. Duty to Cooperate on Strategic Matters.....	13
8. Statements of Common Ground	31
9. Conclusion.....	32
APPENDIX A – Consultation and engagement with Duty to Cooperate bodies.....	33
APPENDIX B - Notes of ‘Duty to Cooperate’ meetings held with neighbouring authorities and prescribed bodies.....	37

1. Introduction

- 1.1. This statement sets out the processes and actions that have been undertaken by the London Borough of Richmond upon Thames to meet the legal and policy requirements of the Duty to Cooperate (DtC) as part of the production of Richmond's Local Plan. This statement identifies how and when the Council has complied with the Duty by engaging with neighbouring local authorities and other prescribed bodies on relevant strategic cross-boundary matters. This statement updates an earlier version (June 2023) to record all the activities undertaken as part of the Publication (Regulation 19) stage and prior to submission of the Local Plan.
- 1.2. Liaison has taken place with neighbouring authorities on the preparation of the Local Plan. This Duty to Cooperate Statement, outlining what engagement and activities have taken place throughout the preparation of the Plan, is to accompany submission of the Plan to the Secretary of State for independent Examination in Public. The Council considers that this statement demonstrates that the duty to cooperate requirements as set out in the Localism Act 2011 and described in the National Planning Policy Framework (NPPF) have been fulfilled and that the Council has engaged constructively, actively and on an ongoing basis during the preparation of the Local Plan.

2. Context

Legal Context

- 2.1. The 'Duty to Cooperate' is a statutory duty for Local Planning Authorities and is a requirement of the Localism Act 2011 and the NPPF.
- 2.2. Section 33A of the Planning and Compulsory Purchase Act 2004, inserted by Section 110 of the Localism Act, places a legal duty on Local Planning Authorities and other prescribed bodies to cooperate on strategic matters when preparing development plan documents. Local Planning Authorities are required to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation.

The National Planning Policy Framework (NPPF)

- 2.3. The latest version of the NPPF published in December 2023 sets out the government's planning policies for England and how these are expected to be applied.
- 2.4. Paragraph 24 of the NPPF states that local planning authorities are under a duty to cooperate with each other and with other prescribed bodies on strategic matters that cross administrative boundaries.
- 2.5. Paragraph 25 of the NPPF states that strategic policy-making authorities should engage with local communities and relevant bodies to identify the strategic matters which they need to address in their plans.

- 2.6. Paragraph 26 of the NPPF states that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy, and that joint working should help determine where additional infrastructure is necessary, and whether development needs that cannot be wholly met within a particular plan area could be met elsewhere.
- 2.7. Paragraph 27 of the NPPF states that strategic policymaking authorities should prepare Statements of Common Ground (SoCG) throughout the plan-making process to demonstrate effective and on-going joint working regarding cross-boundary matters.

Planning Practice Guidance (PPG)

- 2.8. The PPG provides further guidance on how strategic policy-making authorities can meet the Duty to Cooperate, particularly around the preparation and publication of Statements of Common Ground and what information they should contain. Strategic policy-making authorities are expected to document the activities undertaken (which should be tailored to address local circumstances) when in the process of addressing strategic cross-boundary matters whilst cooperating. These include:
 - working together at the outset of plan-making to identify cross-boundary matters which will need addressing;
 - producing or commissioning joint research and evidence to address cross-boundary matters;
 - assessing impacts of emerging policies; and
 - preparing joint, or agreeing, strategic policies affecting more than one authority area to ensure development is coordinated.

Strategic Matters

- 2.9. Section 33A(4) of the Planning and Compulsory Purchase Act 2004 defines strategic matters as:

“sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas”.
- 2.10. As outlined in Paragraph 20 of the NPPF, local planning authorities should prepare strategic policies that set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:
 - a) housing (including affordable housing), employment, retail, leisure and other commercial development;

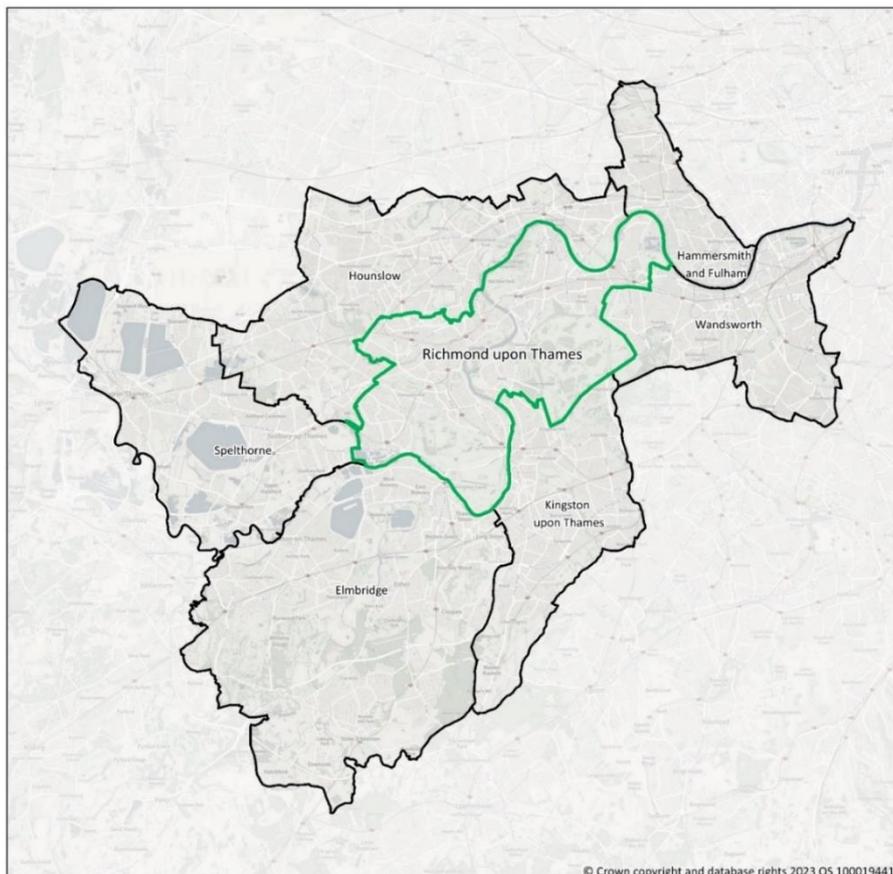
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

Strategic Context

2.11. The London Borough of Richmond upon Thames is an outer London borough and the only London borough on both sides of the River Thames. Richmond 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 also within **Surrey County Council**; the borough councils are responsible for planning, and the county council is generally responsible for strategic functions and services such as transport and education.

2.12. The map below shows the neighbouring authorities which have all been consulted on an ongoing basis during preparation of the Local Plan. These authorities represent key DTC partners and contain areas most likely to be directly affected by the policies set out in the Richmond Local Plan.

Map 1: The relationship between Richmond and neighbouring authorities



© Crown copyright and database rights 2023 OS 100019441

Neighbouring Local Authority Local Plan Status

2.13. A number of neighbouring planning authorities have recently reviewed their Local Plans or are currently reviewing them. Table 1 below shows the current status of their Local Plans.

Table 1. Neighbouring Local Authority Local Plan status

Local Authority	Local Plan Status
London Borough of Hounslow	Local Plan Review (Volumes 2, 3 and 4) - Site Allocations, West of Borough and Great West Corridor DPDs. <i>Resolution to withdraw these DPDs from Examination was made by the Borough Council on 18th July 2023. Local Plan Review to be progressed as a consolidated document.</i> Focused Issues Review (FIR) (Volume 1) consultation from 5 th October to 16 th November 2022. Hounslow Local Plan Review: Regulation 18 Consultation (Single Local Plan), 1 November to 17 December 2023.
London Borough of Wandsworth	Local Plan adopted July 2023. Partial Review of the Local Plan (focussed on Policy LP23 Affordable Housing) Regulation 18 consultation 23 October to 4 December 2023.
London Borough of Hammersmith & Fulham	Local Plan adopted February 2018.
Royal Borough of Kingston upon Thames	Regulation 18 consultation November 2022 to February 2023.
Elmbridge Borough Council	Submitted to the Secretary of State for examination August 2023. Stage 1 hearing session on Duty to Cooperate, Legal and Procedural Compliance on 27 th February 2024.
Spelthorne Borough Council	<i>Examination in Public paused following an Extraordinary Council Meeting on 6th June 2023. Councillors voted to seek a further pause in the Examination timetable on 14th September 2023 until the publication of the proposed changes to the NPPF before agreeing next steps and to seek legal advice on the letter received from the Minister of State for Housing & Planning which included a directive to not withdraw the Local Plan.</i> <i>Spelthorne Borough Council has produced a timeline for resuming the Local Plan examination hearings which is expected to be confirmed with the publication of the revised NPPF.</i>

London Context

2.14. Effective cooperation between the Mayor of London, boroughs and local planning authorities bordering London is vital to ensure that important strategic issues are planned effectively. Richmond has maintained regular and open communication with neighbouring boroughs

throughout all stages of the Local Plan development and all neighbouring boroughs were invited to comment on the draft Local Plan.

- 2.15. Strategic planning in London is the shared responsibility of the Mayor of London, 32 London boroughs and the Corporation of the City of London. Under the legislation establishing the Greater London Authority (GLA), the Mayor is legally required to produce a Spatial Development Strategy (SDS) – which has become known as ‘the London Plan’ – and to keep it under review. As part of the statutory development plan for London, policies in the London Plan should inform decisions on planning applications across the capital unless there are sound planning reasons which indicate otherwise.
- 2.16. As required by Section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004, local development documents including Borough plans must be in general conformity with the London Plan. However, there are certain areas where a locally distinctive approach has been taken that differs from the strategic London Plan policy but that is justified by local evidence. The Council has raised these matters with the GLA during the preparation of the draft Local Plan.

Joint Working

- 2.17. Richmond Council officers actively contribute to the **Association of London Borough Planning Officers (ALBPO)**, which provides a platform for engaging with other London Boroughs on planning matters. Richmond officers attend the regular meetings of the ALBPO Development Plans Committee and the ALBPO Policy Officers Sub-Group where strategic matters and new development plans are discussed. There is also a **London Authorities Viability Group** that brings together planning, housing and surveying officers from planning authorities across London to consider best practice and strategic issues relating to development viability in the planning process.
- 2.18. 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 SLP adds value to the activity led by individual boroughs through collaboration and coordination, strategy and policy development, promotion and representation, and delivering joint programmes. More details are available at www.southlondonpartnership.co.uk.
- 2.19. There are various other existing joint working arrangements that the Council is part of which deal with particular places or issues to assist with the strategic approach and ensure collaboration. Examples of this include the following:
- Legal services are shared with other boroughs; the **South London Legal Partnership (SLLP)** is a five-borough shared legal service for the London Boroughs of Wandsworth, Richmond, Kingston, Merton and Sutton.
 - **The Thames Landscape Strategy** is a group of relevant Boroughs and other organisations such as the Environment Agency, Historic England, and the Royal Parks, who are

concerned with the protection and enhancement of the River Thames and its historic landscape from Hampton to Kew.

- The Council also shares its responsibilities for education and children's services with RB Kingston, for which a Community Interest Company '**Achieving for Children**' was set up.
- There are also regular meetings with specific stakeholders, to discuss joint issues. For example, on flooding there is joint working as part of the [Thames Regional Flood and Coastal Committee](#) and the [London Drainage Engineers Group \(LoDEG\)](#). Additionally, on health there is an established Richmond and Kingston Estates Forum which regularly discusses shared and borough-specific issues regarding health and estates with a range of local health and care partners.

2.20. Since 1 October 2016, Richmond and Wandsworth have had a shared staffing arrangement in place. As a result, planning officers within Richmond and Wandsworth work closely, sharing the same Spatial Planning and Design Team Manager. Joint team meetings are held throughout the year where DtC issues are also discussed.

Prescribed Bodies

2.21. Prescribed bodies are set out in Part 2 of the Town & Country Planning (Local Planning) (England) Regulations 2012. These are:

- the Environment Agency;
- the Historic Buildings and Monuments Commission for England (known as Historic England);
- Natural England;
- the Mayor of London;
- The Civil Aviation Authority;
- The Homes and Communities Agency;
- each Primary Care Trust established under section 18 of the National Health Service Act 2006(2) or continued in existence by virtue of that section;
- the Office of Rail and Road;
- Transport for London;
- each Integrated Transport Authority;
- each highway authority within the meaning of section 1 of the Highways Act 1980(6) (including the Secretary of State, where the Secretary of State is the highways authority); and
- the Marine Management Organisation.

2.22. For the Local Plan, the Council has considered the relevance of each of the prescribed DtC bodies, linked to the nature of the new Local Plan, identifying some as less relevant to the Local Plan which are identified in Appendix A.

3. Richmond's new Local Plan

Local Plan Stages

- 3.1. To date, the Local Plan has been subject to two stages of public consultation in line with the Town and Country Planning (Local Planning) (England) Regulations 2012, and this Statement is published alongside the third stage of public consultation:

Stage	Dates
Direction of Travel Consultation	24 February 2020 - 5 April 2020
Pre-publication Consultation (Regulation 18)	10 December 2021 - 31 January 2022
Publication Consultation (Regulation 19)	9 June 2023 – 24 July 2023

- 3.2. Consultation and engagement on the Local Plan is being carried out in accordance with the measures set out in Richmond's [Statement of Community Involvement](#) that was adopted by the Council in December 2019. There is a separate Statement of Consultation (updated January 2024) which sets out how the Council has undertaken public consultation and stakeholder involvement in the production of the Local Plan.

Direction of Travel stage

- 3.3. The Council started a review of its current Local Plan in the winter of 2019/20 and between 24 February 2020 and 5 April 2020 undertook a consultation on the scope for updating the adopted Local Plan in the form of a '[Direction of Travel](#)' document. The Direction of Travel Consultation (not prescribed by the Town and Country Planning (Local Planning) (England) Regulations 2012) provided the opportunity for early engagement with the borough's communities, businesses, key stakeholders, neighbouring local authorities, and statutory bodies.

Pre-publication stage (Regulation 18)

- 3.4. Following the initial consultation, the Council prepared a [pre-publication draft Plan \(Regulation 18\)](#) setting out proposed planning policies informed by the main issues raised at the Direction of Travel stage and supported by an up-to-date evidence base. A second round of public consultation was held between 10 December 2021 and 31 January 2022. The Council consulted with a range of stakeholders, including both statutory and non-statutory bodies, as well as local communities.

- 3.5. Focused DtC meetings were held with prescribed bodies during and after the consultation period.

Publication stage (Regulation 19)

- 3.6. Following the Regulation 18 consultation, the Council made changes to the Plan (considering comments received on the consultation draft Local Plan, together with any additional/refreshed evidence base work where appropriate). This produced the [Publication](#)

[Local Plan \(Regulation 19\)](#) version of the Plan that the Council intends to submit to the Secretary of State for Examination.

- 3.7. A third public consultation was held between 9 June 2023 to 24 July 2023 to seek further feedback from the borough's communities, businesses, key stakeholders, neighbouring local authorities, and statutory bodies. Comments at this stage should focus on the draft Local Plan's legal and procedural compliance, including the duty to cooperate, and the 'soundness' of the plan, and will go on to be considered by the Planning Inspectorate, who will undertake a Public Examination of the Plan before it can be adopted.
- 3.8. Focused DtC meetings were held with prescribed bodies during and after the consultation period.

4. Direction of Travel Consultation: 24 February 2020 - 5 April 2020

- 4.1. The [Direction of Travel](#) document was the first stage in the engagement process with residents, businesses and other stakeholders on what our vision for growth and future development should be. Alongside the Direction of Travel, there was a 'Call for Sites' consultation, to identify what land may become available during the Local Plan period.
- 4.2. The Council received consultation responses to the Direction of Travel consultation from the following **prescribed Duty to Cooperate bodies**:
 - Marine Management Organisation
 - National Highways (formerly Highways England)
 - Historic England
 - Transport for London
 - The Mayor of London/Greater London Authority
- 4.3. The Council received consultation responses to the Direction of Travel consultation from the following **neighbouring authorities**:
 - RB Kingston upon Thames
 - Spelthorne Borough Council
 - Surrey County Council (no comments)
- 4.4. All of the consultation responses received were published within the [Schedule of Direction of Travel responses \(November 2020\)](#) and summarised in the [Local Plan Direction of Travel Consultation Responses consultation report \(November 2020\)](#) which also sets out overall officer comments on responses to the main issues raised for each question/area of comment.

5. Pre-publication Consultation (Regulation 18): 10 December 2021 - 31 January 2022

- 5.1. The Council reviewed the Direction of Travel consultation responses and feedback, work and updates on the evidence base, and outcomes from DtC engagement. The [Pre-Publication Local Plan](#), which was the Council's first draft of the revised Local Plan, was subject to public consultation from 10 December 2021 until 31 January 2022.
- 5.2. The Council received consultation responses to the Pre-Publication consultation from the following **prescribed Duty to Cooperate bodies**:
- The Mayor of London/Greater London Authority
 - Transport for London
 - Environment Agency
 - Historic England
 - Natural England
 - NHS South West London Clinical Commissioning Group (CCG)
 - National Highways (formerly Highways England)
 - Marine Management Organisation
- 5.3. The Council received consultation responses to the Pre-Publication consultation from the following **neighbouring authorities**:
- Elmbridge Borough Council
 - Spelthorne Borough Council
- 5.4. All of the consultation responses received were published within the [Schedule of Regulation 18 responses](#) (May 2022). The comments are summarised in the Consultation Report set out in the separate Statement of Consultation (June 2023, Appendix 3F) which includes a schedule of responses and the Council's response to those comments raised. The Statement of Consultation was made available alongside the [Publication consultation](#).
- 5.5. Alongside formal notification of the public consultation on the Pre-Publication Local Plan (Regulation 18), which was sent to all the neighbouring authorities and prescribed bodies, individual and bespoke emails were sent to each of the DtC partners considered of relevance to the Local Plan. These bespoke emails built upon the Direction of Travel consultation and where applicable subsequent responses, setting out the strategic, cross-boundary issues previously identified, any updates to the Council's evidence base, and what the Council was taking forward in the draft Local Plan. Each was tailored to provide a summary of the Plan approach and pick up relevant details to their organisation, to put them in a good position to understand the Local Plan and how it might impact them.

- 5.6. The Council also extended an invitation to all the neighbouring authorities and certain prescribed bodies to meet with Council officers virtually to provide a more bespoke update. The organisations that the invitation was extended to are recorded in Appendix A, and notes of the meetings that were held are recorded in Appendix B.

6. Publication Consultation (Regulation 19): 9 June to 24 July 2023

- 6.1. The Council reviewed the Regulation 18 consultation responses and feedback, work and updates on the evidence base, and outcomes from DtC engagement. The [Publication Local Plan](#), which was the Council's second draft of the revised Local Plan, was subject to public consultation from 9 June 2023 until 24 July 2023.
- 6.2. The Council received consultation responses to the Pre-Publication consultation from the following **prescribed Duty to Cooperate bodies**:
- The Mayor of London/Greater London Authority
 - Transport for London
 - Environment Agency
 - Historic England
 - Natural England
 - London Healthy Urban Development Unit (HUDU) in consultation with NHS South West London Integrated Care Board (ICB)
 - National Highways
- 6.3. The Council received consultation responses to the Pre-Publication consultation from the following **neighbouring authorities**:
- Elmbridge Borough Council
 - Spelthorne Borough Council
 - Surrey County Council
 - Royal Borough of Kingston upon Thames
 - London Borough of Hounslow
- 6.4. All the consultation responses received were published within the Schedule of Regulation 19 responses (January 2024). The comments are summarised in the separate Statement of Consultation (January 2024) which includes the schedule of responses. This Statement of Consultation will be available alongside other documents in the Local Plan Examination Library.
- 6.5. Alongside formal notification of the public consultation on the Publication Local Plan (Regulation 19), which was sent to all the neighbouring authorities and prescribed bodies, individual and bespoke emails were sent to each of the DtC partners considered of relevance to the Local Plan. These bespoke emails built upon the Direction of Travel and Regulation 18 consultations and where applicable subsequent responses, setting out the strategic, cross-

boundary issues previously identified, any updates to the Council's evidence base, and what the Council was taking forward in the Publication Local Plan. Each was tailored to provide a summary of the Plan approach and pick up relevant details to their organisation, to put them in a good position to understand the Local Plan and how it might impact them.

- 6.6. The Council also extended an invitation to all the neighbouring authorities and certain prescribed bodies to meet with Council officers virtually to provide a more bespoke update. The organisations that the invitation was extended to are recorded in Appendix A, and notes of the meetings that were held are recorded in Appendix B.
- 6.7. Following on from the Regulation 19 comments raised, including through Duty to Cooperate, 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 will accompany the submission of the Local Plan and were shared with the relevant Duty to Cooperate bodies, to request any feedback particularly if there was missing or insufficient detail. On 28 November 2023, each received where relevant provisional notes of the Duty to Cooperate meeting held at Regulation 19, and drafts of the relevant background topic papers, to provide an informal opportunity to feedback during December 2023 on any areas missing or with insufficient detail.
- 6.8. The papers cover:
- **Housing Delivery:** sets out details of the evidence base in relation to housing delivery using evidence on previous levels of delivery, including build out and lapse rates, and assessing future delivery. This includes the stepped trajectory and updated details from the Housing AMR 2022/23, to support the approach set out in the emerging Local Plan Policy 10.
 - **Transport:** 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.
 - **Affordable Housing:** sets out the reasoning for the prioritisation of affordable housing through the emerging Local Plan Policy 11, taking a policy approach informed by past trends and the future supply pipeline which reflect issues of affordability and the constrained housing supply.
 - **Biodiversity Net Gain:** sets out the reasoning for the approach to biodiversity net gain in the emerging Local Plan Policy 39, given the importance of biodiversity in the borough, the pressures on species and habitats and how new development has already been addressing biodiversity through the planning process. This includes how the new policy may be implemented.
- 6.9. Each paper was shared with the relevant bodies:

- Housing Delivery: Mayor of London/GLA, TfL, National Highways, Historic England, LB Hounslow, Spelthorne District Council, Elmbridge District Council, RB Kingston upon Thames, LB Hammersmith & Fulham, LB Wandsworth
- Affordable Housing: Mayor of London/GLA.
- Transport: Mayor of London/GLA, TfL, National Highways, LB Hounslow, Spelthorne District Council, Elmbridge District Council, RB Kingston upon Thames, Surrey County Council, LB Hammersmith & Fulham, LB Wandsworth.
- Biodiversity Net Gain: Mayor of London/GLA, Environment Agency, Natural England.

6.10. Responses on the background topic papers were initially received from National Highways, Surrey County Council, Transport for London, and Natural England. Others acknowledged the papers but were unable to resource providing feedback during the short timescales. Comments raised are reflected in Statements of Common Ground where relevant (see section 8).

6.11. The Council's response to the main issues raised in Regulation 19 comments will be published as a separate submission document.

7. Duty to Cooperate on Strategic Matters

7.1. This section of the Duty to Cooperate Statement identifies the key strategic matters and issues that have been discussed with neighbouring authorities and prescribed bodies during the preparation of the Local Plan.

Housing, including affordable housing

Background

7.2. The drivers for the new Local Plan, including the higher housing target in the new London Plan, changes to the population, and response to the climate emergency were outlined. The broad spatial strategy is updated from the adopted Local Plan, with a new focus on the 20-minute neighbourhood concept and a new set of place-based strategies. There is a reference in the Plan to the limited options for alternatives to the spatial strategy, given the borough's constraints which prevent meeting the objectively assessed housing and employment needs, however, the Plan is set out on the basis that there is an identified five year housing land supply to exceed the new London Plan target.

7.3. The London Plan 2021 sets out ten-year housing targets for each London Borough. The [Local Housing Needs Assessment \(LHNA\) 2021](#) (to be read in conjunction with the [2023 LHNA Update](#)) by Icení considers demographic trends and a scenario to understand the potential population growth associated with the delivery of 411 homes per annum which is Richmond's housing target set by the London Plan 2021. It is recognised by the Council that meeting the higher housing target in the London Plan 2021 will be a challenge, given the constraints in the borough and meeting other plan priorities. The borough is characterised by large areas of protected open land and constraints such as flood risk, and the remaining area is built up, much of it being within designated Conservation Areas. As such there are few large potential housing

sites available and there is pressure on land for other key uses including schools and employment to support the achievement of sustainable communities.

- 7.4. Paragraph 4.1.10 of the London Plan (2021) sets out that the increase in housing delivery required by the target may be achieved gradually and boroughs are encouraged to set a realistic, stepped housing delivery target over a ten-year period. Justification for a stepped housing delivery target is set out in the Plan, given the considerable increase expected in small sites delivery and given some identified large sites are expected to deliver in years five to ten. Richmond will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies.
- 7.5. Outside of London, Local Plans are expected to use the Government's standard method in national planning guidance as a starting point in determining the number of homes needed. Although the DtC does not apply to the London Plan preparation, the Mayor of London has in the past undertaken some wider policy and infrastructure collaboration across the Wider South East, to inform and consult on relevant strategic matters with authorities beyond London's boundaries, and to cooperate with them on the preparation of their plans.

Key discussion points at Regulation 18 Stage

- 7.6. In DtC meetings with **Elmbridge, Spelthorne, Hounslow, Kingston** and the **GLA** it was recognised that housing continues to be a strategic, cross-boundary issue and there will need to be continued liaison.
- 7.7. Discussion with **Elmbridge** noted that the site allocations do not express capacity in terms of the number of units, which Elmbridge suggested would help to understand capacity, although the Regulation 18 Plan sets out a stepped trajectory as an increase in small site delivery linked to the London Plan would take time to come through. The Urban Design Study has looked at opportunities for change and intensification, and the review to justify the continued protection of open land. It was noted that Richmond is seeking to exceed the London Plan target, which is lower given the borough constraints and position in London. The significant affordable housing needs identified in the LHNA were noted and Richmond, therefore, believes that First Homes will not be acceptable, nor fast track applications for viability in line with the London Plan approach, as Richmond is seeking to maximise 50% affordable housing. **Elmbridge** outlined its emerging development strategy focus is on optimisation, predominantly looking at small sites and opportunities for intensification.
- 7.8. Discussion with **Spelthorne** allowed Richmond to outline work around the importance of meeting local housing needs and older persons' housing, given emphasis on enabling older people to stay in their homes. **Spelthorne** outlined a need for family housing and discussed proposals for older persons' housing.
- 7.9. Discussion with **Hounslow** outlined the expectation that Richmond's housing delivery will derive from small sites and justification for a stepped housing delivery target. Discussed viability and affordable housing. **Hounslow** understands the reasoning for at least 50%

affordable housing provision on all new housing developments given that Richmond has so few larger sites.

- 7.10. The significant affordable housing needs identified in the LHNA were also discussed with **Hounslow** therefore suggested First Homes will not be acceptable, nor fast track applications for viability in line with the London Plan approach, as Richmond is seeking to maximise 50% affordable housing. **Hounslow** is delivering around 32% affordable housing, therefore the Fast Track route could increase affordable housing delivery.
- 7.11. Discussion with **Kingston** outlined work undertaken around local housing needs and older persons' housing and the importance of meeting these needs given emphasis on enabling older people to stay in their homes. **Kingston** outlined that they were yet to determine an overall spatial strategy but were expecting a mix of large and small sites, with larger sites around Kingston town centre including the regeneration of Cambridge Road Estate. **Kingston** has no intention to release Green Belt. Discussed the detailed approach by Richmond in the Urban Design Study around tall and mid-rise building zones, and the potential for future work on detailed design codes. Discussed housing delivery and approach to sites in more detail, including the Housing Delivery Test, although there are no cross-boundary sites.
- 7.12. During discussion with the **GLA**, Richmond outlined that meeting the higher housing target in the London Plan will be a challenge. The **GLA** noted that Richmond is seeking to meet the London Plan target and that the specific approach in paragraph 4.1.11 of the London Plan on carrying forward a target beyond the 10-year period should be followed. The **GLA** also requested clarification on Richmond's older persons' housing target which is lower than the benchmark in the London Plan. Richmond also outlined its approach to affordable housing which considers First Homes and a fast-track viability threshold approach as inappropriate in the borough context to maximise affordable housing delivery. The **GLA** highlighted concerns as not following the threshold approach is likely to constitute a general conformity issue. The **GLA's** evidence is that delivery has increased since the Fast Track route was introduced, and the **GLA** would like to see strong evidence for whether this policy approach would work given historical under-delivery in the borough.

Next steps

- 7.13. Housing is a strategic, cross-boundary issue and there will need to be continued liaison. A stage 2 update of the LHNA will be undertaken in 2022 to consider the latest information and to assist in prioritising local housing needs. The Council will continue to monitor housing delivery in the borough and to keep DtC bodies informed with regard to Richmond's ability to meet the London Plan housing target.

Key discussion points at Regulation 19 Stage

- 7.14. During discussion with **Hounslow**, Richmond noted that although the Site Allocations have been re-formatted to add clarity about the context, their format remains to set out a vision and broad framework to allow for details such as capacity to be assessed as part of pre-application and application stage. Richmond highlighted that while Site Allocations are key to delivery of

the Local Plan if they come forward, delivery from windfall and small sites sets out a case for a stepped trajectory. Richmond outlined that it is intending to produce background topic papers on housing delivery and affording housing to accompany the submission of the Local Plan which will be shared with DtC bodies including **Hounslow** in autumn 2023.

- 7.15. During discussion with **Hounslow**, it was noted that new Site Allocation 18 (Homebase, Hanworth), which is allocated for a residential-led mixed use scheme if it were to come forward, is on the borough boundary. **Hounslow** noted Site Allocation 19 (Fulwell Bus Garage, Twickenham) and the potential to accommodate a residential-led mixed use scheme, although there is no indication that the bus garage is no longer needed. Richmond noted that there is general safeguarding of existing facilities set out in the transport policy and paragraph 23.21 in the Publication Local Plan sets out it is for TfL confirm if operationally facilities are no longer needed or enhanced re-provision been made through redevelopment or elsewhere.
- 7.16. During discussion with **Elmbridge**, it was noted that the site allocations to not express capacity in terms of unit numbers and **Elmbridge** felt the aspirations for the sites were not clear, such as Site Allocation 2 (Platts Eyot, Hampton). **Elmbridge** felt the allocation was not clear in terms of uses and whether it is appropriate or realistic given constraints such as Green Belt and flooding, and therefore unclear whether it would impact across the boundary. Richmond outlined that the allocation had been updated to refer to the 2021 fire and acknowledge that limited residential development may be needed to support the restoration of listed buildings. Richmond noted that the developer has been exploring confidential pre-application proposals but there is no active wider work on a masterplan at present, which **Elmbridge** wish to be involved with in the future.
- 7.17. The **GLA** identified housing and affordable housing as a key issue to discuss as the fast-track viability threshold is not considered in conformity with the London Plan. This was raised in the **GLA**'s comments at Regulation 18 stage and on the draft Affordable Housing SPD, and the **GLA** queried why the policy approach has not been altered. Richmond outlined that the policy approach is driven by local circumstances, including a significant need for local affordable housing and a pipeline with a limited supply of sites. From Richmond's perspective, there will be lost opportunities on large sites to secure units as the 35% threshold would be perceived by developers as a minimum, and it prevents the scrutiny of viability and potential use of Richmond Council's Housing Capital Funding to see if affordable housing provision has been maximised. The **GLA** also outlined that since the 35% threshold was introduced, delivery has increased as set out in the London Plan Authority Monitoring Reports. The intention is to embed the requirement into land values and the **GLA** are concerned at different approaches within London boroughs.
- 7.18. Richmond outlined to the **GLA** that there are few large sites and many policy asks, with viability often raised due to high land values, so it is acknowledged that past affordable housing delivery overall is low. [The Whole Plan Viability Assessment \(2023\)](#) has now been undertaken and there are many types of development envisaged that in some parts of the borough should be able to deliver higher percentages of affordable housing and deliver significant local benefits.

- 7.19. It was agreed with the **GLA** that further work to understand the impact of the threshold approach at the borough level would help to inform further discussions ahead of and during the Examination.
- 7.20. The **GLA** also raised the need to clarify in policy the overall housing target, and look beyond the ten-year target to 2029, including if the end date should be to 2040/41, and the older person's housing target should be explained in more detail.

Next steps

- 7.21. The Council will continue to keep DtC bodies informed with regards to Richmond's ability to meet the London Plan housing target. Richmond outlined that it is intending to produce background topic papers, including on housing delivery and affordable housing, so there is an opportunity to have sight of the details and comment if further information is needed. Draft papers were shared shortly ahead of submission and are informing Statements of Common Ground for the Richmond Local Plan.

Gypsies and Travellers

Background

- 7.22. In Richmond, there is one existing Traveller site in the borough in Hampton containing 12 pitches which are managed by Richmond Housing Partnership (RHP). The Council's latest [research on Gypsies and Travellers \(published in 2023\)](#) suggests that there is no demonstrated need for additional pitches on the existing Traveller site, nor any signals indicating unmet need arising from elsewhere in the borough, although there is a need to protect the existing site.
- 7.23. The London Plan also sets out in the supporting text to Policy H14 that the Mayor will initiate and lead a London-wide Gypsy and Traveller Needs Assessment and will work to support boroughs in finding ways to make provision for gypsy and traveller accommodation. This work is being undertaken by consultants RRR with a draft report is expected later in 2023.

Key discussion points at Regulation 18 Stage

- 7.24. While gypsies and travellers could be considered a strategic issue, there do not seem to be pressing cross-boundary issues which have been raised by neighbouring authorities or prescribed bodies regarding pitch provision or unauthorised encampments. In DtC meetings with **Elmbridge, Spelthorne, Hounslow, Kingston** and the **GLA**, Richmond outlined that the research is due to be updated which will acknowledge some recent unauthorised encampments. Neighbouring authorities also outlined their research.
- 7.25. **Elmbridge** outlined their research updated in 2020 and are expecting to meet need through the intensification of existing sites and have also undertaken a further riverboat assessment. **Spelthorne** have undertaken a needs assessment which identified need for 15 plots for travelling showpeople and are looking at a possible site allocation. **Hounslow** is also looking into future needs for travelling showpeople and acknowledges unauthorised plots/sites in the borough, while the **Kingston** Gypsy and Traveller Accommodation Needs Assessment identifies a need for 44 additional pitches.

- 7.26. **Elmbridge** representations on the Regulation 18 draft Local Plan noted that Policy 41 ‘Moorings and floating structures’ where Richmond will resist new proposals for houseboats unless they are replacements, should be justified by an evidence base that supports this policy.
- 7.27. **GLA** representations on the draft Plan welcome reference to the Mayor’s future London-wide Gypsy and Traveller Accommodation Needs Assessment. During the DtC discussion, the **GLA** emphasised the need to meet pitch requirements if identified.

Next Steps

- 7.28. The Council will continue to keep the GLA and neighbouring boroughs informed with regard to Richmond’s ability to meet the identified need for gypsy and traveller pitches. Richmond will update the Council’s previous research from 2016, which will also acknowledge some recent unauthorised encampments and consider the accommodation needs of riverboat dwellers.

Key discussion points at Regulation 19 Stage

- 7.29. During discussion with **Hounslow** and **Elmbridge**, Richmond’s [updated research on Gypsies and Travellers \(2023\)](#) was noted, which does not identify a need for additional pitches/moorings. **Hounslow** outlined that this was an issue at their Examination and the need for a further call for sites.

Next steps

- 7.30. The Council will continue to keep neighbouring boroughs informed with regards to Richmond’s ability to meet the identified need for gypsy and traveller pitches. It was noted in DtC meetings that the Londonwide Gypsy and Traveller Needs Assessment is being undertaken by consultants RRR with a draft report expected later in 2023, although this is now expected in 2024.

Employment

Background

- 7.31. The borough [Employment Land & Premises Needs Assessment 2021](#) by Stantec advised that the Local Plan should seek to accommodate the growth of 100 industrial jobs per annum / 60,000 sqm/15 ha industrial land, but recognises there are few options to address this deficit. For office floorspace, the [2023 ELPNA Update](#) revised down the identified shortfall of office floorspace from approximately 73,000 sqm to 23,000 sqm and for future need, increased the additional minimum number of office jobs that the Local Plan should seek to accommodate from 130 to 199 per annum. The draft Plan seeks to protect against any further loss or change in the type of employment use, expecting employment-led intensification and all major new development to consider the opportunity to include commercial use. There is emphasis on providing space for the borough’s locally important sectors, and affordable, adaptable workspaces to meet future economic needs.

Key discussion points at Regulation 18 Stage

- 7.32. Although not identified previously as a strategic issue, there have been shared concerns with neighbouring authorities towards the loss of employment floorspace. In DtC meetings with neighbouring authorities, Richmond outlined that its evidence base continues to justify a protectionist approach both on office and industrial floorspace as the evidence base indicates the shortage of space has not improved.
- 7.33. **Elmbridge** outlined taking forward a smaller number of employment areas, those which have only survived due to Article 4 Directions and concerns about employment in some parts of the borough and will be looking at new Article 4 Directions if justified by an updated evidence base. Areas of discussion with **Spelthorne** included the uncertainty post-pandemic, particularly for the office market, and a possible increase in demand for warehousing, but Spelthorne are not proposing to release any Green Belt land for employment. **Hounslow** and Richmond have had shared issues over permitted development rights and loss of employment floorspace and discussed the demand for industrial and shared concerns about losing logistics. **Kingston** outlined its Employment Land Review which identifies shortfalls in employment floorspace, and shared difficulties in finding sites and envisaging future changes.
- 7.34. The **GLA** indicated their support for protecting existing employment space, seeking intensification, and directing workspace to town centres.

Next Steps

- 7.35. The Council will continue to keep the GLA and neighbouring boroughs informed with regard to any changes in the evidence base, and the approach to Article 4 Directions.

Key discussion points at Regulation 19 Stage

- 7.36. Employment was not discussed in-depth with DtC bodies at Regulation 19 stage. During discussion with **Hounslow**, Richmond noted its updated [Employment Land and Premises Needs Assessment \(2023\)](#) and its continued protectionist approach. Richmond noted that the Council has been open that it is unable to meet objectively assessed needs for both housing and employment land and that intensification, while desirable, is not always possible in the borough's context of constrained sites. **Hounslow** noted that it will be refreshing its employment land evidence and that its needs are skewed towards industrial land, particularly logistics.

Town centres and retail

Background

- 7.37. Richmond commissioned Lichfields to prepare a Retail and Leisure Needs Assessment for the Borough, including the main centres of Richmond, East Sheen, Teddington, Twickenham and Whitton. This study will inform future planning policy on town centre, retail and leisure matters in the Borough, together with a wider strategy for the future of the Borough's centres. [Phase 1](#) of the study was published in July 2021 and [Phase 2](#) was published in January 2023. Additionally, the Council have undertaken an Assessment of Borough Centres which was published in 2023 (available on the Council's [retail and leisure evidence base webpage](#)). The

report looks at the composition and role of centres in the borough so that the hierarchy can be reviewed, to update centre boundaries and where necessary draw new ones, and to inform the definition of new primary shopping areas for the five town centres in the borough. The report finds that the hierarchy remains appropriate, with only one change as Twickenham Green is promoted to a neighbourhood centre.

Key Discussion Points at Regulation 18 Stage

- 7.38. In DtC discussions with **Elmbridge**, **Spelthorne** and **Hounslow**, town centres and retail were not identified as a strategic, cross-boundary issue although there are some shared approaches and impacts. Richmond outlined the initial work on future retail and leisure needs, suggesting the need to protect commercial floorspace, with a focus on repurposing existing floorspace and using vacant properties. Richmond will provide a more detailed quantitative and qualitative assessment to be undertaken in 2022.
- 7.39. **Elmbridge** outlined moving towards core activity areas in main centres, seeking to ensure flexibility and working with economic development officers to go beyond traditional uses. Discussion with **Spelthorne** included post-pandemic issues and similar changes on high streets which can be led by the market given the flexibility of Class E. Similarly, the impact of the pandemic on centres was discussed with **Hounslow** but both boroughs agreed it is too early to fully understand the impact.
- 7.40. Town centres and retail has previously been identified as a cross-boundary issue with **Kingston** given the draw of Kingston Town Centre and Richmond's concerns over the potential to negatively impact Richmond's town centres. Discussion with **Kingston** noted that the draw of Richmond and Kingston town centres offer different things, and that local geography influences shopping destinations (e.g. residents living in or around Ham and Hampton are likely to visit Kingston for a lot of their shopping needs).
- 7.41. The **GLA** indicated their support for the approach to repurposing vacant stock and diversification and advised that Policy 19 could mention the Agent of Change as set out in London Plan Policy D13.

Next Steps

- 7.42. Phase 2 of the borough Retail & Leisure Needs Study will include a detailed quantitative and qualitative assessment of the need (including a new household survey) for new retail, leisure and other main town centre uses within the borough and will commence in early 2022. A Methodology Note produced by Lichfields was shared with neighbouring authorities who were invited to share their thoughts to inform Phase 2 of the study by the end of January 2022.

Key discussion points at Regulation 19 Stage

Town centres and retail was not discussed with DtC bodies at Regulation 19 stage.

Transport infrastructure

Background

7.43. Policies 47 and 48 of the Regulation 19 Plan cover sustainable travel and details around parking/cycle parking standards, servicing, and Construction Logistics Management. There is a strong emphasis on walking and cycling as the natural choice, particularly for short journeys, which fits with the Living Locally concept. These policies have been drafted in liaison with the Council's transport planners and reflect the Council's Active Travel Strategy and the Third Local Implementation Plan. The policies reflect the London Plan and the Mayor's Transport Strategy, including vehicle and cycle parking standards, supporting the Healthy Streets approach (also reflected in Policies 1 and 51) and car-free development. A threshold approach linked to development size as to whether a separate Transport Statement or Transport Assessment is required for different types of uses is proposed, to enable resources to be focused on the schemes that have the most impact.

Key discussion points at Regulation 18 Stage

- 7.44. In DtC discussion with neighbouring authorities, Richmond outlined a strong emphasis on active travel, particularly walking and cycling, in the Regulation 18 Plan, which fits with the living locally approach. Post-pandemic Richmond is aware of cuts in service levels for rail and bus; transport planners suggest they are expecting some pick-up later in 2022 but services may not reach pre-pandemic levels. **Elmbridge** outlined similar uncertainty around future travel patterns and noted congestion hot spots for example around Hampton Court Bridge.
- 7.45. Transport infrastructure has previously been identified as a cross-boundary issue with **Kingston**, although there have not been specific issues that needed to be addressed. Key discussion points included Kingston's significant investment in cycling routes, opportunities for new linkages, and the new GLA SPG guidance on transport. Richmond noted that the HRA identified potential air quality issues around Wimbledon Common Special Area of Conservation and are planning to explore strategic traffic modelling to consider further the impact of proposed development.
- 7.46. Transport infrastructure has previously been identified as a cross-boundary issue with the **GLA/TfL**. During discussion, the **GLA** highlighted that modelling/strategic transport assessment would be useful to tie existing work with strategic sites (e.g., Stag Brewery, Kew Retail Park) (and **National Highways** would also welcome) although it was noted this is not related to any conformity issue. Overall, the approach set out in the draft Plan is in line with the London Plan, with emphasis on Living Locally and walking/cycling for short journeys and the Healthy Streets approach. **TfL** also welcomed this approach but noted some of the site allocations are out of step and need to be reviewed where there may not be justification for parking.
- 7.47. Richmond noted in discussions that with no confirmation of funding or timetable for Crossrail 2, it is not mentioned in Richmond's draft Local Plan.

Next steps

- 7.48. Richmond will continue to share and liaise with DtC bodies over transport issues (see also under 'Natural Environment' on the strategic traffic modelling in relation to the HRA issue). An update to Richmond's Infrastructure Delivery Plan will be undertaken.

Key discussion points at Regulation 19 Stage

- 7.49. In discussion with DtC bodies, Richmond outlined the broader context (referred to in the updated Infrastructure Delivery Plan), including declining traffic volumes and the modal shift target in line with the Mayor of London's Transport Strategy. The work referred to in the updated [Habitat Regulations Assessment \(2023\)](#) did look at worst case scenarios and the assessment using TfL models found changes in traffic significantly less than the screening criteria, to address the specific HRA issue. Overall Richmond's Local Plan proposes development in line with the London Plan, and at much lower levels than surrounding boroughs.
- 7.50. Richmond outlined in DtC meetings that it will produce a transport background topic paper and to share with DtC bodies, so there is an opportunity to have sight of the details and comment if further information is needed.
- 7.51. A short extension to the consultation deadline was agreed with **Hounslow** to allow its policy planners to discuss transport matters further with its transport planners. **Hounslow** noted that it has undertaken a transport assessment, with plans to review this as its single Local Plan is progressed as well as exploring sensitivity testing with TfL. **Hounslow** noted in their written Regulation 19 representation that Richmond have not produced a strategic transport study and/or a highways impact assessment and raised a holding objection until evidence relating to the assessment of transport and highways impacts can be reviewed. **Hounslow** will withdraw its objection prior to the commencement of the examination hearings should the information provided demonstrate that there would be no significant cumulative impact upon the road network and public transport demand which would result in cross-boundary issues.
- 7.52. **Elmbridge** expressed concern about the lack of a standalone Transport Assessment, which they have undertaken, and TfL have confirmed this is acceptable. At this stage, **Elmbridge** are concerned there is a lack of detail to show the cumulative impact of all the development has been fully assessed and are uncertain of what was envisaged in the London Plan evidence at that time.
- 7.53. Following the initial DtC meeting with **Elmbridge**, a separate follow up meeting on transport was organised by Richmond with the Transport Strategy Team Manager for Richmond and Wandsworth outlining the details around likely transport impacts. This outlined work for the HRA assessment that has looked at trip generation arising from the Site Allocations, as well as the impact of other interventions, and identified a small amount of extra traffic movements. Comparing with the TfL London Highway Assignment Model and the London Plan work, these are lower than the predictions for 2041. It was noted this does seem to align with the context and modelling in Surrey (led by Surrey County Council as the highway authority). Richmond also

outlined there is capacity to increase public transport (where service levels have been reduced post pandemic) and that other interventions (such as by Royal Parks, and a Londonwide congestion zone) have much more significant impacts than the levels of new development.

Next steps

- 7.54. It was noted that a transport background topic paper is to be produced and shared with DfC bodies in autumn 2023. This happened ahead of submission and is informing Statements of Common Ground for the Richmond Local Plan, with detailed comments received from National Highways, Surrey County Council and Transport for London, that were used to inform an updated paper at submission. It was noted that it is expected that this will be an issue for the Examiner to work through, but Richmond is seeking to be clear at this stage on the context.

Water supply and wastewater management

Key discussion points at Regulation 18 Stage

- 7.55. Water supply and wastewater management have not been identified as a cross-boundary, strategic issue. Discussion with **Hounslow** raised an issue of local concern in both boroughs which is the capacity of the existing sewer system to cope with increases in heavy rainfall events around Mogden Sewage Treatment Works. This issue was briefly discussed with the **EA** who mostly comment on any water discharge, ensuring water quality, and avoiding land contamination which are responsibilities which lie with Thames Water.

Key discussion points at Regulation 19 Stage

- 7.56. **Surrey County Council** expressed interest in the Teddington Direct River Abstraction scheme, which is a Thames Water proposal for a new river abstraction on the River Thames close to Teddington Weir where water abstracted from the river would be transferred via an existing underground tunnel to the Lee Valley reservoirs in East London. While no new significant infrastructure is planned in the borough associated with the Local Plan, Richmond agreed to shared details of this scheme and any other relevant infrastructure projects.

Climate change adaptation

Key discussion points at Regulation 18 Stage

- 7.57. Climate change adaption was not discussed in detail with neighbouring authorities or prescribed bodies, although flood risk has previously been identified as a strategic issue and there continues to be joint working between neighbouring authorities as part of existing joint working arrangements e.g. as part of the [Thames Regional Flood and Coastal Committee](#) and the [London Drainage Engineers Group \(LoDEG\)](#).
- 7.58. The **EA** supported ensuring climate change is factored into flood risk but were uncertain whether a policy position going beyond Government guidance on the upper-end climate change scenarios could be justified due to the practical implications for their role i.e. their statutory advice on planning applications.

Key discussion points at Regulation 19 Stage

- 7.59. In discussion with the **EA**, Richmond outlined that the Plan continues to take a strong approach to climate change adaptation and some of the amends made since the Regulation 18 version. A number of technical requirements have been amended in Policies 8 and 9, with further clarification added e.g. around water quality and amendments to reflect the use of the 'central' scenarios for climate change allowances, which the **EA** noted and appreciated as overall bringing into line with Government advice.
- 7.60. The **EA** noted the policy in regard of flood defences has been strengthened, with further clarification on set back distances added to the Plan. It was noted that an updated Thames Estuary 2100 Plan has been published since the Regulation 18 Plan. The **EA** noted that its Regulation 19 consultation response will suggest some of the policy wording will need to be changed to align with this and to future proof the Plan so that development is in line with the TE2100 Plan recommendations.
- 7.61. The **EA** highlighted that in Policy 8 the detailed references to the 'central' scenarios for climate change allowances would not be correct for some forms of development such as essential infrastructure. The **EA** noted that its Regulation 19 consultation response will suggest reference to gov.uk climate change guidance, as that also future proofs the policy if that guidance is changed.
- 7.62. The definition of a functional floodplain was discussed with the EA and whether Richmond would be using the [Strategic Flood Risk Assessment \(2021\)](#) definition or whether it would consider a different approach based on the new PPG guidance. Richmond clarified that there are no plans to commission further bespoke modelling and therefore would be continuing with the SFRA approach.
- 7.63. In discussion with the **EA** the context for Site Allocation 2 (Platts Eyot, Hampton) was discussed, noting the update to the [Sequential Test Report \(2023\)](#) to reflect the 'more vulnerable' proposed use with the potential to enable residential development. The **EA** noted that if access/egress is within Flood Zone 3b then the site is treated as a functional floodplain, and it would be up to the developer to suggest if there can be safe access/egress.
- 7.64. Richmond outlined that there are no plans for any additional reports, with no plans to undertake a Level 2 SFRA. The Sequential Test Report supports the Local Plan and has been updated with Metis setting out all the details, with any errors raised now corrected.
- 7.65. Discussion with **Historic England** in terms of climate change noted the need for retrofit measures to historic buildings to be appropriate interventions and avoid maladaptation. Richmond outlined reference to avoiding maladaptation had been added into the Regulation 19 Plan and are happy to consider any additional specific wording. **Historic England** suggested further signposting, including to guidance and highlighting the dangers of inappropriate interventions and taking the approach to build up iterative interventions, and recognising the importance of monitoring energy performance.

Next steps

- 7.66. It was outlined that Richmond will consider Statement(s) of Common Ground and will be in touch with DtC bodies in autumn 2023 and these are being progressed at the submission stage. Richmond notified the EA that officers were in the process of finalising its [Environment Agency Consultations Authority Monitoring Report](#) covering the financial years 2016 to 2022, which has since been published.

Climate change mitigation

Key discussion points at Regulation 18 Stage

- 7.67. Climate change mitigation was not discussed in detail with neighbouring authorities or prescribed bodies, although the need to address the climate emergency is a shared priority.
- 7.68. Richmond briefly discussed the impact on viability with **Spelthorne** and **Kingston** and the importance of going beyond national policy/London Plan policy due to the Council's priorities and borough context. Richmond outlined that the proposed increase in the carbon offset rate is to act as a disincentive, with a preference to address on-site.
- 7.69. During the meeting with the **GLA**, Richmond outlined its ambitions to go beyond the London Plan, which requires a strong evidence base particularly around viability, for on-site reduction, small sites, and carbon offset. Richmond and the **GLA** discussed how priorities such as climate change and affordable housing need to both be addressed from a strategic perspective.

Next steps

- 7.70. Richmond will be looking at further evidence on climate change and the whole plan viability.

Key discussion points at Regulation 19 Stage

- 7.71. Climate change mitigation was not discussed in detail with DtC bodies at Regulation 19 stage. The [Net Zero Carbon Study](#) was published in 2023 as well as a [Whole Plan Viability Assessment \(2023\)](#).

Health infrastructure

Background

- 7.72. The Regulation 19 draft Local Plan recognises health and wellbeing as a cross-cutting theme. Policy 51 sets out an updated approach, to reflect health priorities and future infrastructure needs, such as space for social prescribing, emphasis on inclusive access, dementia-friendly environments, and access to public toilets and free drinking water. The Plan reflects London Plan Policy E9 in taking a restrictive approach to takeaways. The Plan links with related health plans and strategies, and the move to integrated care systems.

Key discussion points at Regulation 18 Stage

- 7.73. Health infrastructure was not discussed in detail during DtC meetings, although this has not been identified as a strategic, cross-boundary issue in the past. **Elmbridge** discussed looking at adapting the London Healthy Urban Development Unit model in terms of health contributions.

- 7.74. Progress of the Richmond Local Plan was presented to the **Richmond Health and Wellbeing Board** (HWB) on 17.03.22. The Richmond HWB is a partnership between Richmond Council, local GPs, the Integrated Care Board (responsible for commissioning and overseeing health services) and the voluntary sector to agree on shared priorities for improving the health and wellbeing of the people in Richmond.
- 7.75. The HWB were asked to note the current position on the development of the Local Plan including the approach to issues and provide any appropriate insight to inform the next steps. In response to questions from the HWB, several points and suggestions were made, which are detailed in Appendix B. It was noted that the Local Plan was important in terms of the impact on health and that Public Health have worked collaboratively with Planning on the draft Plan. The priorities identified from the Joint Strategic Needs Assessment (JSNA) have been reflected in the draft Plan. The Regulation 18 consultation response received by the South West London CGG (since replaced by the South West London Integrated Care Board) was also endorsed and reinforced.

Key discussion points at Regulation 19 Stage

- 7.76. Health infrastructure was not discussed with DtC bodies at Regulation 19 stage. The NHS London Healthy Urban Development Unit (HUDU) responded to the Regulation 19 consultation in liaison with the NHS South West London Integrated Care Board (ICB). This representation recognised that Richmond has incorporated many of the changes that HUDU recommended at the Regulation 18 stage, but reiterated their previous suggestion that a direct reference to health or social infrastructure should be included into the policy criterion of Policy 55 Delivery and Monitoring rather than just the supporting text.
- 7.77. A brief update on the progress of the Richmond Local Plan was shared at a meeting of the Kingston and Richmond Estates Forum on 13 June 2023, and responses to the Regulation 19 consultation were encouraged. The Forum regularly discusses shared and borough-specific issues regarding health and estates with a range of local health and care partners. Partners have provided updated inputs where available that have informed the update to the Infrastructure Delivery Plan published at submission.

Schools and education

Key discussion points at Regulation 18 Stage

- 7.78. Schools and education were not discussed in detail with neighbouring authorities or prescribed bodies, although this has not been identified as a strategic, cross-boundary issue in the past. Discussion with **Hounslow** noted the opening of Turing House School on their new permanent site in Whitton in April 2022, and the impact of the new school at Kneller Hall on the road network will need to be considered as part of a future planning application. Richmond noted that a new secondary school is proposed on the Stag Brewery site and a new Special Educational Needs school at Barnes Hospital. Richmond and **Kingston** continue to work together on education matters under 'Achieving for Children' – the Councils' joint Children's Services department.

Historic Environment

Background

7.79. There is a significant emphasis in the draft Plan on the borough's historic environment. The Council commissioned Arup to undertake an Urban Design Study (UDS) to inform the new Local Plan. The [UDS 2021](#) was accompanied the Draft Pre-Publication Regulation 18 version of the Local Plan. The [final version of the UDS 2023](#) accompanied the Regulation 19 Local Plan. The UDS sets out the importance of the borough's local character, including the setting of the River Thames and our designated heritage assets. This was informed by a public consultation in May/June 2021, inviting comments on what is special about certain areas/places in the borough, and an analysis of the 412 responses received is set out in the UDS (Appendix F).

Key discussion points at Regulation 18 Stage

7.80. In DtC discussions with **Elmbridge** and **Spelthorne** the historic environment was not discussed in detail, although this has not been identified as a strategic, cross-boundary issue in the past. The historic environment has been previously recognised as a strategic, cross-boundary issue with **Hounslow**, particularly in relation to tall buildings and the impact on views and settings of key heritage assets, especially on the Royal Botanic Gardens Kew World Heritage Site and its buffer zone, as well as Conservation Areas and river views within Richmond borough. Additionally, the historic environment has been previously recognised as a strategic, cross-boundary issue with **Kingston** in relation to tall buildings in Kingston Town Centre and along the riverside and the potential impact on views and settings of heritage assets within Richmond borough. The policy frameworks in the relevant Local Plans enable consideration of these issues when proposals are brought forward.

7.81. The **GLA** raised some areas where it was felt details should be set out in policy, not just supporting text such as the requirement for heritage assessments for proposals affecting Kew World Heritage Site, and the principles of London Plan Policy HC4 London View Management Framework for the strategic view King Henry VIII's Mound to St Paul's Cathedral. The **GLA** indicated that the Plan sets an approach for tall buildings with clear maximum building heights in appropriate designated areas, which appears to conform with the London Plan.

7.82. **Historic England** provided detailed comments in response to the Regulation 18 consultation, which noted that the draft Plan represents the historic environment well and considers it consistently and appropriately throughout. Historic England's main concerns relate to the detail associated with site allocations. **Historic England** note that site allocations do not assign densities or quantum of development and believe this would be helpful for clarification and that the findings of the UDS could be better transposed into policy objectives, particularly within the site allocation policies.

Next steps

7.83. These issues are subject to ongoing liaison through consultations on policy documents and discussions regarding redevelopment proposals. The UDS has identified further additional local

views, and these will be consulted upon in a Views and Vistas SPD. A final version of the UDS will be published to accompany the Regulation 19 Local Plan.

Key discussion points at Regulation 19 Stage

- 7.84. Discussion with **Hounslow** continued to recognise the historic environment as a strategic, cross-boundary issue and a matter for continued liaison. **Hounslow** responded to Richmond's [Consultation Draft Local Views SPD](#) in 2022, and the 'new' views are now being proposed for designation in the Local Plan.
- 7.85. **Historic England** raised that there appears to be a gap between arriving at capacity and design parameters, as they are looking for an assessment of the significance of the heritage assets so that is considered in the policy approach. This is primarily related to those Site Allocations with listed buildings within the site such as Site Allocation 10 (St Mary's University, Strawberry Hill), where there could be more clarity about where development is going to happen, and how it should take account of significance.
- 7.86. Richmond outlined to **Historic England** that its updated UDS (2023) includes a boroughwide character assessment, but at site level it would depend on whether there has already been work as part of pre-app or application proposals, such as the Stag Brewery (Site Allocation 35) with applications already under consideration.
- 7.87. **Historic England** are seeking to understand what contribution the wider site in its current form makes to heritage significance and then assessing what impact the allocation would have on that significance as an important starting point to inform development parameters and site capacities that avoid harm and identify opportunities for enhancement. It is noted that this approach aligns with London Plan Policy D3 Optimising Site Capacity and its associated London Planning Guidance.
- 7.88. **Historic England** also raised concern about the proposed tall building zone for Site Allocation 31 (Kew Retail Park, Bessant Drive, Kew) and are seeking justification for its siting.
- 7.89. Discussion with **Historic England** in relation to Kew World Heritage Site noted the need to reference Outstanding Universal Value within the policy as the central purpose is to conserve its heritage significance. Richmond felt this was covered but is happy to consider any further specific additional wording.

Next steps

- 7.90. These issues continue to be subject to ongoing liaison through consultations on policy documents and discussions regarding redevelopment proposals.

Natural Environment

Background

- 7.91. A review of Green Belt, Metropolitan Open Land (MOL), Local Green Space (LGS) and Other Open Land of Townscape Importance (OOLTI) within the borough was undertaken by Arup on

behalf of Richmond, which is available on the Council's [open land and biodiversity evidence webpage](#). Feedback on the methodology was sought from neighbouring authorities and the GLA to ensure consensus on the approach. Stakeholders were able to provide written comments on the draft Methodology and other statutory bodies were also notified. Table C4.1 of the [Open Land Review 2021](#) presents the consultee responses and details Arup's response and where appropriate, the change made.

Key discussion points at Regulation 18 Stage

- 7.92. In DtC discussions, Richmond outlined the open land review undertaken by Arup finding that all Green Belt met its purposes strongly and is recommended for retention and that the majority of MOL is assessed as performing strongly. No strategic issues have been identified previously that need to be addressed, but the importance of the River Thames and the protection of designated open spaces and land for biodiversity value have been discussed, along with the approach to the Green Belt. **Elmbridge** outlined a similar approach and are not amending the Green Belt boundary. **Spelthorne** are only proposing to release a very small proportion of Green Belt for housing/Gypsies and Traveller needs. It was discussed with **Kingston** whether there are public open space deficiencies along the shared border, noting the considerable influence of Richmond Park on Kingston, and the importance of details around access points.
- 7.93. The **GLA** raised a specific point about play space, and the need to ensure policy recognises informal recreation facilities as much as formal provision, which is emphasised in paragraph 5.4.2 of the London Plan.
- 7.94. The **EA** stated that they would like to see river enhancements where proposals come forward with a stretch of riverside development. Richmond outlined that there may be constraints due to viability and when balanced with other contributions on particular sites and that Richmond will be commissioning a Whole Plan Viability Assessment. During discussion with the **EA** it was noted that opportunities for river enhancements are linked to Biodiversity Net Gain and that Richmond is asking for 20%, above the legal level of 10% being put forward by Government, which will need to be considered through the viability evidence.
- 7.95. In an email response to the Regulation 18 Consultation, **Natural England** stated that they would support the strengthening of Policy 37 to encourage visitors towards greenspaces outside of those which are Habitat Sites and recognise the need for further traffic modelling to be able to inform the impacts of the Plan in terms of air quality and the specific issue identified in the HRA about the potential effect of the integrity of the Wimbledon Common Special Area of Conservation. **Natural England** also noted that they would be happy to be reconsulted on the HRA once this modelling has been completed.

Next steps

- 7.96. The Council will continue to keep the GLA and neighbouring boroughs informed with regard to any further evidence base, particularly on exploring strategic traffic modelling (see also under 'Transport infrastructure'.

Key discussion points at Regulation 19 Stage

- 7.97. In discussion with the **EA**, requirements around biodiversity net gain were raised and the aspects still not confirmed from the Environment Act. Richmond outlined the case to go for a biodiversity net gain of 20% including small sites, which is based on local circumstances and will need to be set out for the Examination. There is synergy with the **EA** aims where small sites may be next to rivers and the net gain can be achieved cumulatively including for aquatic habitats.
- 7.98. It was noted that the **EA** advocate a Riverside Strategy Approach, with emphasis on the benefits to flood risk, biodiversity and public realm. Although in places Richmond had not added this specific wording into the Plan, it was as all the strands were already considered adequately covered within policies.

Next steps

- 7.99. The Council will continue to keep the GLA and neighbouring boroughs informed with regard to any further evidence base.

Waste management

Background

- 7.100. London Boroughs are required to allocate sites and identify waste management facilities in order to provide sufficient capacity to manage the apportioned tonnages of waste, as set out in the London Plan. To achieve this, the Council adopted the West London Waste Plan (WLWP) in 2015 in partnership with the West London Waste Authority boroughs of Brent, Ealing, Harrow, Hillingdon and Hounslow (this also includes the Old Oak and Park Royal Development Corporation). The WLWP sets out how the boroughs will jointly manage their waste apportionment requirements.

Key discussion points at Regulation 18 Stage

- 7.101. Waste management was not discussed in detail with neighbouring authorities or prescribed bodies, although it was noted the WLWP is due for review by 2031, and that the Surrey Waste Plan was adopted in December 2020.

Key discussion points at Regulation 19 Stage

- 7.102. Discussion with **Hounslow** noted that the upcoming review of the West London Waste Plan is commencing.
- 7.103. Discussion with **Surrey County Council** centred round approaches to waste management. For Richmond, the London Plan sets waste apportionment figures. Policy 7 in the Local Plan covers waste and the circular economy including safeguarding of existing waste sites, but largely signposts to policies in the West London Waste Plan (WLWP). Richmond outlined that the WLWP review is starting to commence. Discussions are underway to set up joint working, with a Memorandum of Understanding being finalised and the project management being undertaken by the West London Alliance. The first officer meeting is scheduled for autumn 2023.

7.104. Discussion with **Surrey County Council** also noted that Site Allocation 12 (The Stoop (Harlequins Rugby Football Club), Twickenham) is adjacent to Twickenham Depot, a safeguarded waste site. As the Council's waste transfer site, consideration of any potential development impacts would be covered by other Plan policies. **Surrey County Council** noted that while movements of waste between Richmond and Surrey do not meet the threshold for strategic movements, there is a hazardous waste stream going to landfill at Redhill, Patteson Court. The planning permission for this waste site is due to expire at the end of 2030, unless an extension is applied for which is yet to come forward.

Next Steps

7.105. Richmond agreed to share contact details for the project manager leading the WLWP review with **Surrey County Council** and keep officers updated with the review. Liaison on waste management will continue through the Duty to Cooperate.

Other issues

7.106. The issues of Energy infrastructure, Community and cultural infrastructure, and Telecommunications infrastructure, were not discussed in detail with neighbouring authorities or prescribed bodies, although they have not been identified as strategic, cross-boundary issues in the past.

8. Statements of Common Ground

8.1. Paragraph 27 of the NPPF introduced since 2018 (as part of the DtC process) a requirement for strategic policy-making authorities to, 'prepare and maintain one or more statements of common ground (SoCG).' The purpose of the SoCG is to document strategic cross-boundary matters and progress in cooperating to address them. It demonstrates that the Local Plan is based on effective and ongoing cooperation and that LPAs have sought to produce strategies that as far as possible are based on agreements with other authorities. The SoCG should be produced, published, and kept up to date by the signatory authorities as an accessible and public record of where agreements have or have not been reached on cross-boundary strategic issues.

8.2. The Council is preparing a number of SoCG with neighbouring authorities and other organisations and will, where necessary and where directed, undertake additional SoCG with any other bodies following the consultation on the Publication Local Plan (Regulation 19), when the position with respect to agreed and unresolved issues will be clearer, and this will continue after submission and during the Examination process.

8.3. The Council has already, where relevant, signed up to a number of SoCG with neighbouring authorities relating to their Local Plan preparation processes (Hounslow, Spelthorne, Wandsworth and Elmbridge). These will provide a starting point for matters to address and also

demonstrate ongoing active engagement at key milestones in the preparation of other's Local Plans.

- 8.4. This Duty to Cooperate Statement should be read in conjunction with the Statement(s) of Common Ground that the Council has prepared/are in preparation.

9. Conclusion

- 9.1. Throughout the preparation of the Draft Local Plan, the Council has engaged actively with its stakeholders and partners and discussed with them all strategic matters. The Draft Local Plan published under Regulation 19 (Town and Country Planning Act (Local Planning) (England) Regulations 2012) reflects the views and comments received during the engagement and cooperation process.
- 9.2. This Duty to Cooperate Statement, the Consultation Statement and the Statement(s) of Common Ground demonstrate how the Council has complied with its Duty to Cooperate and will be used during the Examination in Public to show that the Local Plan is based on effective joint working across local authority boundaries.

APPENDIX A – Consultation and engagement with Duty to Cooperate bodies

Organisation	Correspondence sent	Meetings/events	Consultation responses	Notes
Prescribed Bodies				
Environment Agency	<p>Prenotification of Regulation 18 DtC/invitation to meet 21.12.2021.</p> <p>Regulation 18 bespoke email sent on 12.01.2022.</p> <p>Regulation 19 bespoke email sent on 26.06.2023.</p> <p>Meeting notes from Reg 18 DtC meeting shared.</p> <p>Meeting notes from Reg 19 DtC meeting shared.</p>	<p>DtC meeting held virtually on 19.01.2022.</p> <p>DtC meeting held virtually on 18.07.2023.</p>	<p>Regulation 18 consultation response received on 07.02.2022.</p> <p>Regulation 19 consultation response received on 24.07.2023.</p>	
Historic England	<p>Prenotification of Regulation 18 DtC/invitation to meet 21.12.2021.</p> <p>Regulation 18 bespoke email sent on 11.01.2022.</p> <p>Regulation 19 bespoke email sent on 30.06.2023.</p> <p>Meeting notes from Reg 19 DtC meeting shared.</p>	<p>DtC meeting held virtually on 18.07.2023.</p>	<p>DoT consultation response received 18.03.2020.</p> <p>Regulation 18 consultation response received on 31.01.22.</p> <p>Regulation 19 consultation response received on 21.07.2023.</p>	
Natural England	<p>Prenotification of Regulation 18 DtC/invitation to meet 21.12.2021.</p> <p>Regulation 18 bespoke email sent on 11.01.2022.</p> <p>Regulation 19 bespoke email sent on 26.06.2023.</p>		<p>DoT consultation response received on 06.03.2020 (no comments).</p> <p>Regulation 18 consultation response received on 12.01.2022 (no comments) and 18.01.2022.</p> <p>Regulation 19 consultation response received on 18.07.2023.</p>	
Mayor of London/Greater London Authority	<p>Prenotification of Regulation 18 DtC/invitation to meet 21.12.2021.</p> <p>Regulation 18 bespoke email sent on 12.01.2022.</p> <p>Regulation 19 bespoke email sent on 23.06.2023.</p> <p>Meeting notes from Reg 18 DtC meeting shared.</p> <p>Letter of conformity request sent to the Mayor of London on 9.6.2023.</p> <p>Meeting notes from Reg 19 DtC meeting shared.</p>	<p>DtC meeting held virtually on 20.01.2022 (jointly with TfL).</p> <p>DtC meeting held virtually on 11.07.2023 (GLA only).</p>	<p>DoT consultation response received 20.03.2020.</p> <p>Regulation 18 consultation response received on 31.01.22.</p> <p>Regulation 19 consultation response received on 24.07.23.</p>	<p>GLA confirmed the London Enterprise Partnership do not need to be consulted separately.</p> <p>There is no separate Local Nature Partnership for London (a GLA contact is named on the Government contacts webpage); the GLA take a lead on green infrastructure across London.</p>
Civil Aviation Authority	n/a	n/a	n/a	<p>LB Richmond upon Thames considers that there are no strategic issues of relevance to discuss with the Civil Aviation Authority. The CAA is a statutory consultee and is consulted on all our planning policy documents, including the Local Plan; however, it is not thought to be necessary to hold specific duty to cooperate meetings with the CAA.</p>

Homes England (previously the Homes and Communities Agency)	n/a	n/a	n/a	Responsibilities in London for affordable housing transferred to the Mayor of London/Greater London Authority from April 2012.
Health bodies - including Clinical Commissioning Groups (CCGs), NHS organisations. The South West London CCG is now the NHS South West London Integrated Care Board.	Regulation 18 bespoke email sent on 11.01.2022. Regulation 19 bespoke email sent on 12.07.2023 to NHS London Healthy Urban Development Unit.	Report on progress of the Richmond Local Plan presented to the Richmond Health and Wellbeing Board 17.03.22.	DoT consultation response received from NHS Property Services on 03.04.2020. Regulation 18 consultation response received from South West London Clinical Commissioning Group on 31.01.2022. Regulation 19 consultation response received from Healthy Urban Development Unit written in consultation with the South West London Integrated Care Board 14.07.2023.	There is regular liaison through the Richmond and Kingston Estates Forum. Note the West London NHS Trust and South West London and St George's Mental Health Trust comments in their capacity as a landowner on specific sites.
Transport for London	Prenotification of Regulation 18 DtC/invitation to meet 21.12.2021. Regulation 18 bespoke email sent on 12.01.2022. Regulation 19 bespoke email sent on 23.06.2023. Meeting notes from Reg 18 DtC meeting shared.	DtC meeting held virtually on 20.01.2022 (jointly with the GLA).	DoT consultation response received by TfL on 22.03.2020. Regulation 18 consultation response received on 29.01.2022. Regulation 19 consultation response received on 22.07.2023.	Note TfL Commercial Development comment in their capacity as a landowner, separate to TfL in its statutory role as the strategic transport authority for London.
Integrated Transport Authority	n/a	n/a	n/a	LB Richmond upon Thames is the Highways Authority for the area; the Council's transport planners are involved in the preparation of the Local Plan, leading on transport policies.
National Highways (formerly Highways England)	Regulation 18 bespoke email sent on 11.01.2022. Regulation 19 bespoke email sent on 23.06.2023.	n/a	DoT consultation response received 20.03.2020. Regulation 18 consultation response received on 25.01.2022. Regulation 19 consultation response received on 21.07.2023.	While the Council considers National Highways to be an important Duty to Cooperate body, due to the nature of development sites in the borough there is limited impact upon the areas under the remit of National Highways whose interests lie in the M4 to the north and M3 south just outside the borough boundary. LB Richmond upon Thames does however note interest in highways and transport matters in relation to regeneration and new development, and how local authorities identify and prioritise transport improvements to deliver sustainable development and manage trip demand. National Highways has been consulted on all public consultations relating to the Local Plan.
Marine Management Authority	n/a	n/a	DoT consultation response received 24.02.2020. Regulation 18 consultation response received on 31.01.2022.	LB Richmond upon Thames considers that there are no strategic issues of relevance to discuss with the MMO through specific duty to cooperate meetings. The MMO has prepared the South East Inshore Marine Plan which was published in June 2021. This would apply to planning activity on a section of tidal

				river. This is a statutory consideration in all relevant authorisation or enforcement decision-making.
Office of Rail Regulation	n/a	n/a	n/a	LB Richmond upon Thames considers that there are no strategic issues of relevance to discuss with the Office of the Rail Regulation, which is a statutory consultee and is consulted on all our planning policy documents, including the Local Plan; however, it is not thought to be necessary to hold specific duty to cooperate meetings with this Office.
Neighbouring Authorities				
Hammersmith & Fulham	Prenotification of Regulation 18 DtC/invitation to meet 22.12.2021. Regulation 18 bespoke email sent on 11.01.2022. Regulation 19 bespoke email sent on 30.06.2023.			
Kingston upon Thames	Prenotification of Regulation 18 DtC/invitation to meet 22.12.2021. Regulation 18 bespoke email sent on 12.01.2022. Regulation 19 bespoke email sent on 26.06.2023. Meeting notes from Reg 18 DtC meeting shared.	DtC meeting held virtually on 25.01.2022.	Online DoT consultation response received via the consultation portal. Regulation 19 consultation response received on 21.07.2023.	
Hounslow	Prenotification of Regulation 18 DtC/invitation to meet 22.12.2021. Regulation 18 bespoke email sent on 11.01.2022. Regulation 19 bespoke email sent on 26.06.2023. Meeting notes from Reg 18 DtC meeting shared. Meeting notes from Reg 19 DtC meeting shared.	DtC meeting held virtually on 03.02.2022. DtC meeting held virtually on 19.07.2023.	(A follow up email to the Reg 18 DtC meeting was sent by Hounslow, outlining discussions/issues, confirming content to engage via DtC correspondence and not making a formal Reg 18 representation.) Regulation 19 consultation response received on 31.07.2023. Received revised + approved notes from Reg 19 DtC meeting 1.12.23.	
Wandsworth	Regulation 18 bespoke email sent on 11.01.2022. Regulation 19 bespoke email sent on 12.07.2023.	Richmond and Wandsworth have a shared staffing arrangement in place. The two Councils have a very close functional relationship, although retain their sovereignty and separate governance arrangements, so cross-boundary planning issues are kept under review.	n/a	
Spelthorne	Prenotification of Regulation 18 DtC/invitation to meet 22.12.2021. Regulation 18 bespoke email sent on 11.01.2022. Regulation 19 bespoke email sent on 26.06.2023.	DtC meeting held virtually on 17.01.2022. Meeting notes were shared with Spelthorne on 16.08.2022.	DoT consultation response received on 27.03.2020 – no comments. Regulation 18 consultation response received on 24.01.2022. Regulation 19 consultation response received on 21.07.2023.	
Elmbridge	Prenotification of Regulation 18 DtC/invitation to meet 22.12.2021.	DtC meeting held virtually on 24.01.2022. Meeting notes were shared with Elmbridge on 09.06.2022.	Regulation 18 consultation response received on 19.04.2022.	

	<p>Regulation 18 bespoke email sent on 11.01.2022.</p> <p>Regulation 19 bespoke email sent on 23.06.2023.</p> <p>Meeting notes from Reg 19 DtC meeting shared.</p>	<p>DtC meeting held virtually on 10.07.2023. Follow-up meeting held on 13.07.2023 to discuss transport further. Meeting notes were shared with Elmbridge on 25.07.2023.</p>	<p>Regulation 19 consultation response received on 24.07.2023.</p>	
Surrey County Council	<p>Regulation 18 bespoke email sent on 11.01.2022.</p> <p>Regulation 19 bespoke email sent on 30.06.2023.</p> <p>Meeting notes from Reg 19 DtC meeting shared.</p>	<p>DtC meeting held virtually on 12.07.2023.</p>	<p>DoT consultation response received on 24.02.2020 – no comments.</p> <p>Regulation 19 consultation response received on 20.07.2023.</p>	

APPENDIX B - Notes of 'Duty to Cooperate' meetings held with neighbouring authorities and prescribed bodies

1. DtC meeting with **LB Hounslow** 03.02.2022 and follow-up email 10.02.2022
2. DtC meeting with **LB Hounslow** 19.07.2023
3. DtC meeting with **RB Kingston upon Thames** 25.01.2022
4. DtC meeting with **Elmbridge BC** 24.01.2022
5. DtC meeting with **Elmbridge BC** 10.07.2023 and follow-up meeting 13.07.2023
6. DtC meeting with **Spelthorne BC** 17.01.2022
7. DtC meeting with **Surrey CC** 12.07.2023
8. DtC meeting with **GLA** and **TfL** 20.01.2022
9. DtC meeting with **GLA** 10.07.2023
10. DtC meeting with **Environment Agency** 19.01.2022
11. DtC meeting with **Environment Agency** 18.07.2023
12. DtC meeting with **Historic England** 18.07.2023
13. **Richmond Health and Wellbeing Board**: minutes of the meeting held on 17.03.2022

Duty to Co-operate Meeting

London Borough of Hounslow and London Borough of Richmond upon Thames

3 February 2022 2:30pm, Virtual MS Teams

Attendees:

Hounslow: Duncan McKane, Danalee Edmund

Richmond: Joanne Capper, Joe Roberts, Melissa McCallum

1. Welcome introductions

2. Brief overview on Richmond and Hounslow Local Plans

- **Richmond Local Plan** – at Regulation 18 consultation. Richmond outlined the main drivers for reviewing the Local Plan including the higher housing target in the new London Plan (increased from 315 homes to 411 homes per annum), and responding to the climate emergency. The Direction of Travel consultation was in 2020, pre the pandemic, and now progressed initial evidence base work.
- **Hounslow Local Plan Reviews** – at Examination. Focused hearings on fundamental cross-cutting matters were in 2021, with further work envisaged including consultation on post-Regulation 19 changes, before the Examination progresses further. Noted the concerns from Richmond have been around the Great Western corridor and the longer distance views to Kew WHS; heritage will be addressed in the second part of the Examination hearings.

3. Identification and discussion of strategic and/or cross-boundary issues and priorities (using the detailed update on the Richmond Local Plan circulated in January 2022 as a starting point for discussions)

- **Overall approach including spatial strategy and site allocations**

Richmond outlined the approach is updated from the adopted Local Plan, with a new focus on the 20-minute neighbourhood concept and a new set of place-based strategies.

Richmond outlined many of the site allocations are rolled forwards, there are eight new site allocations proposed. Some of the largest sites mentioned – Kew Retail Park, Homebase in East Sheen, and the Stag Brewery. Kneller Hall close to the boundary shared between the authorities, similar allocation to the adopted Plan, but the Ministry of Defence has disposed of the site and it is now owned by Dukes Education who will be bringing the site forward as a new upper school for Radnor House. Also close to the boundary, is Car park for Sainsbury's, Hampton, which is proposed for MOL release for 100% affordable housing.

Discussed the detailed approach by Richmond in the Urban Design Study. This has identified tall and mid-rise building zones; there are criteria to assess mid-rise buildings if they come forward outside of these zones. For small sites, expecting a design and character-led approach.

Hounslow were successfully awarded PropTech funding and created digital mapping to assess potential windfall sites forming part of the Local Plan evidence base. Discussed the NPPF focus reflected in the Local Plan examination is about delivery.

- **Housing**

Previously discussed that housing is a **strategic issue** with a common evidence base through the London Plan, and there will need to be continued liaison.

Meeting the higher housing target of 411 homes per annum in the London Plan 2021 (an increase from the previous target of 315 homes per annum) will be a challenge, given the constraints in the borough and meeting other plan priorities, and a stepped housing delivery target over a ten-year period is considered relevant to the borough. The London Plan expectation is for higher delivery from small sites in outer London. Hounslow's target increased from 822 to 1,782 homes per annum.

Noted the Richmond significant affordable housing needs identified in the Local Housing Need Assessment, therefore suggested First Homes will not be acceptable, nor fast track applications for viability in line with the London Plan approach, as seeking to maximise 50% affordable housing. Hounslow delivering around 32% affordable, so the fast track rate could increase delivery. Richmond outlined the lack of large sites means cannot afford to miss out on opportunities to delivery.

- **Gypsies and Travellers**

Not previously identified as a strategic issue. Richmond outlined research due to be updated, some recent unauthorised encampments but not aware of any patterns of travel as a cross-boundary issue. The one existing site in Hampton – Bishops Grove; Richmond Housing Partnership manage the site as there was a large scale voluntary transfer of all affordable housing many years ago, and it seems to provide for extended families and we have been able to show future needs can be met within that through turnover of pitches.

Hounslow looking into future needs for travelling showpeople, and a site-search exercise. There are unauthorised plots/sites in the borough.

Discussed ways to identify other unmet needs. Noted that in east Surrey, a new transit site is being proposed in Tandridge, however a planning application still under consideration.

- **Employment**

Although not identified previously as a strategic issue, there have been shared issues over PD rights and loss of employment floorspace. Richmond outlined evidence base is continuing to justify a restrictive approach. For the adopted Local Plan, both identified housing and employment needs could not be met. Continued loss of employment floorspace.

Discussed the demand for industrial, and shared concerns about losing logistics. Possible emphasis on intensification e.g. stacking, but Richmond's evidence base found sites are being used efficiently and due to wider constraints redevelopment and increasing massing may not be appropriate.

- **Town centres and retail**

Not identified previously as a strategic, cross-boundary issue.

Richmond outlined initial work on future retail and leisure needs. Discussed the impacts on the pandemic on centres. Richmond seen some vacancies but also some bounceback, with the Regulation 18 Plan focus on the living locally aspect, seeking to diversify centres and repurpose space, including modern, flexible office space. Both identified it is too early to fully understand the impact.

- **Transport infrastructure**

Not previously identified as a cross boundary issue, although discussed transport improvements in the past. Richmond outlined strong emphasis on active travel in the Regulation 18 Plan. There are aspirational improvements for transport links within a number of the place-based strategies, including a green walkway along Barnes Bridge, and a new pedestrian and cycle bridge between Ham and Twickenham.

Hounslow outlined in terms of 'big ticket' infrastructure – shuttle and orbital links, southern rail access to Heathrow in the west. Discussed low car parking standards / car free, and bringing about behavioural change to increase walking and cycling. The Examination has looked at strategic transport modelling for the growth of London (including neighbouring boroughs).

- **Water supply and wastewater management**

Not identified as a cross-boundary, strategic issue in the past. Mentioned an issue of local concern is the capacity of the existing sewer system to cope with increases in heavy rainfall events, around Mogden STW, as in Richmond impacts on the River Crane. This also comes up in enquiries in Hounslow, and the Council looks to ensure the up-keep and maintenance is in accordance with planning permission(s) and associated conditions/legal agreements.

- **Climate change adaption**
- **Climate change mitigation**

Not discussed in detail, and not previously identified as a strategic, cross-boundary issue, albeit the need to address the climate emergency is a shared priority.

- **Energy infrastructure**

Not discussed in detail, but this has not been identified as a strategic issue in the past.

- **Health infrastructure**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Schools and education**

This has not been identified as a strategic issue in the past, we have discussed the difficulties in finding school sites and some shared catchments in the Whitton/Hounslow area.

Noted as previously that residents in the Whitton area relate to Hounslow. Turing House School is opening on their new permanent site in Whitton in April 2022. The impact of the new school at Kneller Hall on the road network will need to be considered as part of a future planning application. Elsewhere in the borough, noted a new secondary school proposed on the Stag Brewery site, and a new SEN school at Barnes Hospital; the need for future school place planning kept under review.

- **Community and cultural infrastructure**

Not discussed in detail, but this has not been identified as a strategic issue in the past.

- **Historic environment**

Recognised previously as a **strategic, cross-boundary issue** particularly in relation to tall buildings and the impact on views and settings of key heritage assets, especially on the Royal Botanic Gardens Kew World Heritage Site and its buffer zone, as well as Conservation Areas (especially Kew Green) and river views, within Richmond borough, subject to ongoing liaison through consultations on policy documents and discussions regarding redevelopment proposals.

Noted already Richmond's Urban Design Study, and planning a Views and Vistas SPD – expecting to add ones that have been referenced in other documents e.g. the Thames Landscape Strategy.

- **Natural environment**

No strategic issues have been identified previously that need to be addressed, but the importance of the River Thames and the protection of designated open spaces and land for biodiversity value have been discussed, along with the approach to the Green Belt.

Richmond outlined the open land review undertaken by Arup, finding that all Green Belt met the purposes strongly and recommended for retention, and majority of MOL assessed as performing strongly with just the one site proposed for release for housing. Some new LGS (in addition to the site already adopted as LGS - Udney Park Playing Fields) and OOLTI which include existing parks and open plan.

- **Telecommunications infrastructure**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Waste management**

Not discussed in detail, but previously joint working on the West London Waste Plan which is due for review by 2031.

4. Statement(s) of Common Ground – including timescales, sign off arrangements

Discussed the relative sign-off arrangements in each borough.

For the Hounslow Local Plan, Statements of Common Ground already signed, but Historic England looking to revisit theirs around tall buildings and may suggest another meeting including with Kew WHS. Hounslow will organise another meeting and update us in the summer if this moves forward, linked with next steps on the Local Plan.

Richmond will keep informed of consultation on the Views & Vistas SPD.

5. Any Other Business including consideration of next steps / future meetings

None discussed.

Postscript – see email from Hounslow, as below.

Follow up email from London Borough of Hounslow 10 February 2022

From: Duncan Mckane [REDACTED]
Sent: 10 February 2022 14:00
To: Richmond Local Plan <RichmondLocalPlan@richmondandwandsworth.gov.uk>
Cc: Danalee Edmund [REDACTED]; Roberts, Joe
[REDACTED]; McCallum, Melissa
[REDACTED]
Subject: RE: Richmond draft Local Plan - Duty to Cooperate (Hounslow)

Dear Joanne,

Thank you again for meeting with us last week and apologies for the delay in responding. On reflection, we are content at this stage to engage with you on the production of your Regulation 18 local plan via duty to cooperate correspondence, and will not be making a formal representation at this stage. We hope that this will allow us to enter into a statement of common ground (SoCG) later in the year to update the positions we have already agreed as part of previous duty to cooperate work.

Whilst we await your notes from the meeting, we thought it would be best to set out some of our initial views on some of the emerging strategic cross-boundary matters discussed.

Overall approach including spatial strategy and site allocations

- In terms of overall spatial strategy, LBH support LBRuT in its approach to facilitating 20 minute neighbourhoods, managing change to ensure growth is delivered in a sustainable way with supporting infrastructure, and the emphasis placed upon tackling the climate emergency and biodiversity crisis.
- LBH note that there are several large sites allocated for mixed use (including residential) close to the border:
 - Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton
 - Site Allocation 20: Kneller Hall, Whitton
 - Site Allocation 12: The Stoop (Harlequins Rugby Football Club), Twickenham
- LBH would welcome further engagement on these sites in terms of the provision of supporting infrastructure to ensure that specific and cumulative impacts to local provision of services and the highways network can be addressed at an early stage.

Housing

- LBH note LBRuT's position with regard to the challenges in meeting the higher housing target in the London Plan 2021 (411 dpa) given the constraints in the borough and the need to meet other plan priorities. LBH note the preference for a stepped housing delivery target as being relevant for LBRuT to ensure it can meet its need over the 10 year period.
- LBH note LBRuT's approach to affordable housing, including not taking forward a fast track viability threshold approach or a requirement for First Homes given the high level of need in the borough and the constrained nature of supply
- LBH and LBRuT have agreed positions on meeting housing need in the existing SOCG1 LBH Joint Statement of Common Ground (2020) for the emerging LBH local plan reviews. LBH would welcome the sharing of any further updates to LBRuT's evidence base, including the LHNA Stage 2 update, so that we can determine whether these positions need to be updated in a forthcoming LBH-LBRuT SoCG.

Gypsies and Travellers

- LBH note that LBRuT are intending to update their previous Gypsies and Travellers (GT) evidence base (2016) in 2022 which will also acknowledge some recent unauthorised encampments.
- As an outcome of the ongoing examination of our local plan reviews, LBH will be undertaking a Site Search Exercise as an addendum to the Site Allocations and Capacity Assessment (SACA) this year to find additional deliverable and developable sites to meet identified needs for Travelling Showpeople (TS) accommodation over the plan period.
- LBH request that LBRuT kindly share their updated GT evidence base when this is available, and LBH will reciprocate with the findings of the TS site search exercise if required.

Employment

- LBH note the findings of Stantech's Employment Land & Premises Needs Assessment 2021 with regards to LBRuT's future need for industrial jobs/floorspace, and the shortfall in office floorspace and the future need for jobs and floorspace of this type.
- LBH's most up-to-date evidence base relating to employment needs is EMP03 LBH Employment Land Review Update (2020), which suggests the LBH plan review should plan to provide additional land for 147,088sqm of office floorspace and 182,770sqm of industrial floorspace. LBH also wish to bring your attention to a technical note we produced with Stantech in response to our Inspectors' request that we consider the implication of an extended plan period up to 2037 (i.e. 3 additional years) for the Council's employment need/targets. Should the plan period be extended, this would account for approx. 31,000sqm of additional industrial floorspace, and approx. 19,000 sqm4 additional office floorspace, compared with the previous plan period (up to 2034).
- LBH considers that the positions agreed in the SOCG1 LBH Joint Statement of Common Ground (2020) relating to both parties planning to meet their objectively assessed employment needs still stand, but we would welcome the opportunity to update these positions in light of any salient updates to the underpinning evidence base as part of a new SoCG to be agreed later this year.

Historic environment

- LBH entered into a SoCG with LBRuT and Royal Botanic Gardens, Kew (RBGK) in December 2020 to agree positions relating to emerging design and heritage policy in the LBH Vol.4 GWC DPD (policy GWC5), development proposals in the emerging LBH Vol.2 Site Allocations DPD and underpinning evidence base documents (including the GWC Masterplan and Capacity Study (2020) and Views Testing Appendix 2020).
- LBH note that LBRuT are producing a Views and Vistas SPD later in 2022 which will include consultation on further additional local views identified in LBRuT's Urban Design Study (UDS). Whilst we note LBRuT's assurances that these are local views only and therefore should not present any further cross-boundary issues with regards to tall buildings, views and heritage impact, LBH would appreciate further engagement on this matter once the emerging SPD has been published for consultation in order to determine whether any updates would be required to the positions agreed in SOCG6 LBH, LBRuT and RBGK SoCG 2020.

Transport infrastructure

- LBH supports the strong emphasis placed upon on active travel and sustainable transport in the Reg18 local plan document.
- LBH welcomes the draft Plan's proposed transport improvement close to the shared border, including a green walkway along Barnes Bridge, a cycle scheme on Kew Road, the potential for a new cycle hub at Kew Gardens and upgrades to the Kew Gardens Station footbridge, and other local potential improvements to increase active travel. We would welcome further engagement on these proposals as they are developed in order to ensure sustainable and active travel infrastructure improvements can be coordinated to better facilitate sustainable movements across the our shared border.
- LBH notes LBRuT consider none of these improvements are linked to infrastructure requirements necessary to accommodate future growth, and that LBRuT are proposing to update their IDP in 2022.

Schools and education

- LBH notes that there are some difficulties in finding school sites and some shared catchments identified in the Whitton/Hounslow area. We would welcome further engagement on this issue if it is deemed to be necessary by our respective schools teams.
- LBH note that the American University site is allocated for education-led use as priority, followed by community use – and that the University itself is set to relocate it's campus to Hounslow from September 2022. We will monitor the situation and will engage on this if this proves to be necessary.

We look forward to receiving your notes and to receiving any further evidence base documents as these are published so that we can progress with an update to our SoCGs, should this be required.

Kind regards,

Duncan McKane

Policy Officer
Spatial Planning - Housing, Planning & Economic Regeneration
London Borough of Hounslow
Hounslow House
7 Bath Road
TW3 3EB

www.hounslow.gov.uk

Follow us online: Twitter: [@LBofHounslow](https://twitter.com/LBofHounslow) and Facebook: www.facebook.com/HounslowCouncil

Duty to Co-operate Meeting

London Borough of Hounslow and London Borough of Richmond upon Thames

Wednesday 19 July 2023 11am, Virtual MS Teams

Attendees:

Hounslow: Duncan McKane, Christopher Kirk

Richmond: Joanne Capper, Jo Simpson, Jordan Pratchett

1. Welcome introductions

2. Brief overview on Richmond Local Plan

- **Richmond Local Plan – at Regulation 19 consultation**

Richmond outlined since we met at the Regulation 18 stage, the main drivers and main approach in the Local Plan have not altered. The further evidence base work and consideration of comments led to some amends to the Plan. Consulting to 24 July and then aiming for submission later in the autumn.

- **Hounslow Local Plan – update on taking forward a single Local Plan, and consultations on the Supplementary Planning Documents on Climate Change Mitigation and Adaptation, and Character, Sustainability and Design Codes.**

Hounslow outlined the three DPDs were under Examination (Vol.3 West of Borough, Vol.4 Great West Corridor and update on the Vol.2 Site Allocations) but issues were identified in relation to the Inspectors' advice to complete the Focused Issues Review of Local Plan Vol.1 before re-commencing the examination of Vols.2-4. Following assessment of the options available, the decision to withdraw, consolidate and update all of these volumes into a consolidated, single Local Plan has been agreed by full Council. LBH are undertaking evidence base updates and intend to undertake a focussed Regulation 18 consultation in autumn 2023.

The draft Character, Sustainability and Design Codes SPD is an update to the Urban Context and Character Assessment 2014 and will also propose design codes and further design guidance for the borough. The Character, Sustainability and Design Codes SPD has undergone 2 rounds of consultation and is being updated in line with comments received.

The complementary draft Climate Change Mitigation and Adaptation SPD has set out technical guidance on building fabric and services and how developers can improve energy performance and deliver net zero development. The Climate Change Mitigation and Adaptation SPD has undergone an initial consultation and will be consulted on further in 2024.

3. Identification and discussion of strategic and/or cross-boundary issues and priorities - the detailed update on the Richmond Local Plan sent on 26/6/23 can be used as a starting point for discussions. Previously identified housing and the historic environment as strategic, cross-boundary issues between our boroughs; with site allocations, transport impacts, the River Thames, protection of designated open spaces and land for biodiversity discussed previously as being important issues in the vicinity of the shared boundary.

- Overall approach including spatial strategy and site allocations
- Housing including affordable housing
- Gypsies and Travellers

Richmond outlined the overall spatial strategy has not changed since the Regulation 18 Plan. The Site Allocations have been re-formatted to add clarity about the context, although the format of the site allocations (as in previous Plans) is to set out a vision and broad framework, to allow for details such as capacity to be assessed as part of pre-app and application stage. There are three new Site Allocations added in the Regulation 19 Plan which were noted.

Discussed that the Site Allocations are sites key to delivery of the Local Plan if they come forward, but there will be delivery from windfall and small sites and the Plan sets out a case for a stepped trajectory, with the largest sites such as Stag Brewery and Kew Retail Park moving through the planning stages. Richmond outlined it is intending to draw together details on housing delivery and affordable housing into background topic papers to accompany the submission of the Local Plan, which can be shared with Hounslow later in the autumn. Discussed seeking to roll forward the London Plan target in accordance with the London Plan.

In particular the new Site Allocation 18 Homebase, Hanworth is on the borough boundary, allocated for a residential-led mixed use scheme if it comes forward. Also noted Site Allocation 19 Fulwell Bus Garage which is promoted by TfL Commercial Development. Although there is no indication that the bus station is no longer needed, and so the vision is to retain the bus garage and, subject to other constraints such as proximity to MOL, there is potential to accommodate a residential-led mixed use scheme. Discussed in relation to bus garages there is general safeguarding of existing facilities set out in the transport policy, and paragraph 23.21 in the Publication Local Plan sets out it is for TfL confirm if operationally facilities are no longer needed or enhanced re-provision been made through redevelopment or elsewhere.

Richmond's updated research on Gypsies and Travellers has been published, which does not identify a need for additional pitches or any cross-boundary issues. Hounslow outlined this was an issue at their Examination, and the need to undertake a further site-search exercise to address identified needs for Travelling Showpeople accommodation, which the proposed allocations would not fully meet. The issue in Hounslow is a lack of brownfield sites to meet identified need, and the Inspectors were wishing to see whether sites could be identified for those who do not meet the Government PPTS definition, but who nevertheless would be likely to require culturally appropriate accommodation. For both boroughs, noted the London-wide Gypsy and Traveller needs assessment being undertaken by RRR, and will continue future liaison on this issue.

- Employment

Richmond have updated the evidence on employment needs, and are still taking a protectionist approach as continue to lose existing stock – the Council has been open, as in previous Local Plans, that unable to meet objectively assessed needs for housing and employment. For industrial, looking for additional floorspace through any redevelopment, although aware intensification is not always possible in the borough's context of constrained sites. The approach includes making it clear in the Plan that marketing does not justify an exception to policy.

Hounslow will be refreshing the employment land evidence, but needs is skewed towards industrial land especially logistics.

- Historic environment

This has been recognised previously as a strategic, cross-boundary issue particularly in relation to tall buildings and the impact on views and settings of key heritage assets, especially on the Royal Botanic Gardens Kew World Heritage Site and its buffer zone, as well as Conservation Areas and river views, within Richmond borough. Richmond consulted in 2022 on a draft Local Views SPD, to which Hounslow responded, and the 'new' views are now being proposed for designation in the Local Plan. It is agreed this is a matter for continued liaison, to ensure both Local Plans set the appropriate policy framework for assessing site-specific proposals.

- Transport infrastructure

Richmond outlined the broader context (referred to in the updated Infrastructure Delivery Plan), including the declining traffic volumes and the modal shift target in line with the Mayor of London's Transport Strategy. The work referred to in the updated HRA (with consultants WSP) did look at worst case scenarios and the assessment using TfL models found changes in traffic significantly less than the screening criteria, to address the specific HRA issue. Overall Richmond's Local Plan proposes development in line with the London Plan (that was accompanied by a full evidence base), and at much lower levels than surrounding boroughs such as Wandsworth. Richmond outlined it is intending to draw together details into a transport background topic paper to accompany the submission of the Local Plan, which can be shared with Hounslow later in the autumn around mid/late September, so there is an opportunity to have sight of the details and comment if further information is needed. This will be ahead of submission and can inform Statements of Common Ground for the Richmond Local Plan.

Discussed that there are no details in a published report at this stage to demonstrate that the cumulative impact of all proposed development has been fully assessed, and Hounslow will be discussing further with transport planners (a short extension to the consultation deadline agreed to allow for this, and Richmond offered to share contact details for the Transport Strategy Team Manager if wish to discuss direct).

Hounslow have undertaken a transport and highways assessment to support Vol.2-4, and there are plans to review this work and to look at sensitivity testing with TfL in due course to support the consolidated, single Local Plan.

In terms of other infrastructure, Richmond noted the updated Infrastructure Delivery Plan has not identified any 'big ticket' items necessary to support the Local Plan.

- Waste management

Noted the upcoming review of the West London Waste Plan is commencing.

Other issues were not discussed in detail, but have not been identified as strategic, cross-boundary issues in the past.

4. **Statement(s) of Common Ground** – including timescales, sign off arrangements

Statements of Common Ground were agreed for Hounslow's Examination (a general one and a specific one jointly also with Kew WHS). An update was in discussion previously, although assume these will now be updated when appropriate as the new single Local Plan is taken forward in due course.

For Richmond, will be looking at updating our Duty to Cooperate Statement for submission with evidence of these meetings etc. and then consider Statement(s) of Common Ground, and are likely to be in touch again in the autumn to discuss drafting and sign off etc.

5. **Any Other Business** including consideration of next steps / future meetings

There were no specific actions identified, but there will be future meetings to continue these conversations as part of the Duty to Cooperate, and upcoming liaison sharing the background topic papers, and then in relation to the Statement of Common Ground.

Duty to Co-operate Meeting

Royal Borough of Kingston upon Thames and London Borough of Richmond upon Thames

25 January 2022 10am, Virtual MS Teams

Attendees:

Kingston: Thomas Sild, Mirela Chirac

Richmond: Joanne Capper, Louis Osman, Gemma Hotchkiss, Blanka Hay

1. Welcome introductions

2. Brief overview on Richmond and Kingston Local Plans

- **Richmond Local Plan** – at Regulation 18 consultation. Richmond outlined the main drivers for reviewing the Local Plan including the higher housing target in the new London Plan (increased from 315 homes to 411 homes per annum), and responding to the climate emergency. The Direction of Travel consultation was in 2020, pre the pandemic, and now progressed initial evidence base work.
- **Update on Kingston Local Plan progress** – Kingston outlined began early engagement in 2018 to gauge views, and a further Regulation 18 engagement in 2021 from which feedback is being compiled. Expecting to go out with draft Local Plan for consultation later in 2022 (may depend on local elections). The 2021 engagement was aided by consultants, included some roadshows, and got a good level of response.

3. Identification and discussion of strategic and/or cross-boundary issues and priorities (using the detailed update on the Richmond Local Plan circulated in January 2022 as a starting point for discussions)

- **Overall approach including spatial strategy and site allocations**

Richmond outlined the approach is updated from the adopted Local Plan, with a new focus on the 20-minute neighbourhood concept and a new set of place-based strategies. There is a reference in the Plan to the limited options for alternatives to the spatial strategy, given the borough's constraints which prevent meeting the objectively assessed housing and employment needs, however the Plan is on the basis that there is an identified five year housing land supply to exceed the new London Plan target.

Richmond outlined many of the site allocations are rolled forwards, many of the new and larger site allocations are away from the boundary shared between the authorities. Around Ham residents often look more towards Kingston - noted Ham Close is a long-standing Site Allocation for comprehensive redevelopment of the estate, with a planning application expected in the spring; the vision for the area reflects the Ham & Petersham Neighbourhood Plan.

Discussed contacts on the Conservation side as interest in the Conservation Area Appraisal programme (the Richmond team is led by Barry Sellers, and Nicolette Duckham is still the lead on Conservation matters) contact details can be provided). The programme has been

agreed by Committee, with two additional fixed term posts to give the capacity to carry out the work. Not aware this is expecting to lead to a heritage strategy.

- **Housing**

As discussed in the past, agreed that housing is a **strategic issue** with a common evidence base through the London Plan, and there will need to be continued liaison.

Richmond outlined work around the local housing needs and older persons housing – importance of meeting local needs, given emphasis on enabling older people to stay in their homes. Noted the challenges generally around housing delivery; on affordable housing not considering First Homes or the fast-track viability threshold approach appropriate in the borough, and not identified need for any additional student accommodation.

Kingston outlined yet to determine the overall spatial strategy but expecting a mix of large and small sites, with the larger sites around Kingston town centre and including the Cambridge Road estate regeneration (1300 net additional homes and Committee approved first phase). Undertaken a 2018 Green Belt/MOL Study and performing its purposes, so no intention to release Green Belt.

Discussed the detailed approach by Richmond in the Urban Design Study. This formed a boroughwide character assessment, to identify the tall and mid-rise building zones, and sets out design guidance. There are no decisions yet around design codes, or whether some of the guidance could be included more formally in a future SPD.

Discussed general references to the London Plan policies and whether helpful to reference details, as they can go out of date, but Richmond felt it was helpful to make specific links to see where there may be a difference in the policy approach.

Discussed in more detail housing delivery and approach to sites, including the Housing Delivery Test, although no cross-boundary sites. Kingston took part in the Strategic Housing Market Assessment with North-East Surrey, but the GLA see London as the housing market. Kingston expecting to undertake a new call for sites.

- **Gypsies and Travellers**

Richmond outlined research due to be updated, some recent unauthorised encampments but not aware of any patterns of travel as a cross-boundary issue. Kingston's GTNA from 2018 identified need for 44 additional pitches. A substantial site at Chessington Hook and some churn at existing sites. There are plans being take forward for a new transit site in Tandridge.

- **Employment**

Although not identified previously as a strategic issue, there has been a shared concern towards the loss of employment floorspace. Richmond outlined evidence base is continuing to justify a restrictive approach; progressing with Article 4 Direction for Class E to residential. Discussed the uncertainty post-pandemic, particularly for office market.

Kingston's Employment Land Review identified shortfalls (43,000sqm office floorspace, 5,600 light industrial, and 11,000 general industrial). Similarly difficult to find sites and envisage future changes. Expecting a new Unilever HQ as they are moving to Kingston. Also progressing a non-immediate Article 4 Direction and waiting to hear from Government, also will looking at town and neighbourhood centres.

- **Town centres and retail**

Previously identified as a **cross-boundary issue** given the draw of Kingston Town Centre and Richmond's concerns over the potential to negatively impact on Richmond's town centres, which is subject to regular monitoring. It was noted the draw of Richmond and Kingston town centres offer different things, and some is down to local geography e.g. residents around Ham and Hampton are likely to visit Kingston town centre for a lot of their shopping needs.

Richmond outlined the initial work on future retail and leisure needs, suggesting need to protect commercial floorspace, with a focus on repurposing existing floorspace and using vacant properties; a more detailed quantitative and qualitative assessment is to be undertaken in 2022. Kingston have not yet commissioned updated research and utilise the GLA town centre health checks.

A number of the Kingston town centre sites are under discussion, need to think about viability. Discussed Kingston's car parks as one of the main issues – many are development sites, although also providing for shoppers, particularly those from Surrey where public transport is more difficult. Kingston First gauging customer habits. Look at Guildford and Croydon as comparables for modelling.

- **Transport infrastructure**

Previously identified as a **cross boundary issue**, although there have not been specific points of discussion or issues that needed to be addressed.

Richmond outlined strong emphasis on active travel, particularly walking and cycling, in the Regulation 18 Plan, which fits with the living locally approach.

Discussed opportunity for new linkages. A new pedestrian and cycle bridge between Ham and Twickenham is mentioned in the Local Plan, but there has only been initial feasibility on viable locations, there is no funding identified.

Noted that with no confirmation of funding or timetable for Crossrail 2 (post pandemic aware of cuts to existing rail service levels), it is deliberately not mentioned in Richmond's draft Local Plan.

Kingston outlined the significant investment in cycling through the 'Go Cycle' programme – four routes, out from the town centres (not to Richmond borough), which has generally received positive feedback.

Discussed the new GLA SPG guidance on transport and suggestions around walking and identifying areas where the pedestrian environment needs to be improved, although noted schemes generally brought forward by transport planners.

Noted the Richmond HRA identified potential air quality issues around Wimbledon Common SAC and planning to explore strategic traffic modelling to consider further the impact of proposed development (as a result of the Richmond Local Plan alone and/or in-combination with others).

- **Water supply and wastewater management**

Not discussed in detail, but this has not been identified as a strategic issue in the past.

- **Climate change adaption**

Not discussed in detail, although previously identified flood risk as a strategic issue, there continues joint working between both authorities as part of existing joint working arrangements.

- **Climate change mitigation**

Not identified previously as a strategic, cross-boundary issue, although recognising the need to address the climate emergency is a shared priority. Discussed that going beyond national policy/London Plan and testing impact on viability is key. The proposed increase in carbon offset is to act as a disincentive, preference to address on-site. Richmond will be preparing a further evidence base document, particularly to address feasible and deliverable, including considering small sites, as keen to ensure if designed in early this shouldn't result in significant additional costs.

- **Energy infrastructure**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Health infrastructure**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Schools and education**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Community and cultural infrastructure**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Historic environment**

Recognised previously as a **cross-boundary issue** in relation to tall buildings in Kingston Town Centre and along the riverside and the potential impact on views and settings of heritage assets within Richmond borough, although subject to ongoing liaison through consultations on policy documents and discussions regarding redevelopment proposals.

Noted already Richmond's Urban Design Study, and planning a Views and Vistas SPD. Kingston have done a study, and some new views being put forward; plan to reach out to Richmond's conservation officers in relation to the views around Richmond Hill and Hampton Court.

- **Natural environment**

No strategic issues have been identified previously that need to be addressed, but have agreed to continue to work together with regards the approach to the River Thames and parks.

Not discussed in significant detail, but Richmond outlined the open land review undertaken by Arup. One MOL site is proposed for release to affordable housing, as the significant affordable housing need is set out in the LHNA.

Discussed whether there are public open space deficiencies along the shared border, noting the significant influence of Richmond Park on Kingston, and the importance of details around access points. Richmond intending to look further at the GiGL mapping, and have invited comments on this in the Regulation 18 Plan.

- **Telecommunications infrastructure**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Waste management**

Not discussed in significant detail. Richmond mentioned that the West London Waste Plan is coming up for review.

4. Statement(s) of Common Ground – including timescales, sign off arrangements

Discussed the relative sign-off arrangements in each borough. For Kingston raise with Portfolio Holder and generally can take a couple of weeks.

Richmond advised the earliest the Regulation 19 consultation would be is September. Kingston have met with a number of other boroughs over last couple of years, continue to liaise.

5. Any Other Business including consideration of next steps / future meetings

None discussed.

Duty to Co-operate Meeting

Elmbridge Borough Council and London Borough of Richmond upon Thames

24 January 2022 11am, Virtual MS Teams

Attendees:

Elmbridge: Suzanne Parkes, Sarah Pharoah

Richmond: Joanne Capper, Joe Roberts, Louis Osman

1. Welcome introductions

2. Brief overview on Richmond and Elmbridge Local Plans

- **Richmond Local Plan** – at Regulation 18 consultation. Richmond outlined the main drivers for reviewing the Local Plan including the higher housing target in the new London Plan (increased from 315 homes to 411 homes per annum), and responding to the climate emergency. Elmbridge indicated they are planning to respond to the consultation (an extension to the deadline offered if helpful). Discussed the London Plan now expects outer London to maximise delivery of small sites, particularly in areas for intensification e.g. close to town centres and in existing residential areas, which is reflected in the Regulation 18 Plan.
- **Update on Elmbridge Local Plan progress and emerging development strategy** – Elmbridge outlined discussing the preferred spatial strategy with the Local Plan Working Group, and while no formal decision yet, no exceptional circumstances identified to release Green Belt. Not expecting to meet their identified housing need as a result, approximate 27% shortfall (which has been reduced, even though with the standard methodology the housing figure has increased), and no other boroughs have indicated they can assist with meeting needs. This is expected to be the basis of the Regulation 19 consultation and an examination, with evidence base setting this out.

3. Identification and discussion of strategic and/or cross-boundary issues and priorities (using the detailed update on the Richmond Local Plan circulated in January 2022 as a starting point for discussions)

- **Overall approach including spatial strategy and site allocations**

Richmond outlined the approach is updated from the adopted Local Plan, with a new focus on the 20-minute neighbourhood concept and a new set of place-based strategies. There is a reference in the Plan to the limited options for alternatives to the spatial strategy, given the borough's constraints which prevent meeting the objectively assessed housing and employment needs, however the Plan is on the basis that there is an identified five year housing land supply to exceed the new London Plan target.

Richmond outlined many of the site allocations are rolled forwards, many of the new and larger site allocations are away from the boundary shared between the authorities. Discussion noted the site allocation for Platts Eyot is similar to the adopted Local Plan, to protect the employment and river-related uses, although in light of Heritage at Risk, and an

updated note referring to a recent fire, there is recognition of limited enabling residential development.

- **Housing**

Discussion noted that the site allocations do not express capacity in terms of number of units, which Elmbridge suggested would help to understand capacity, although the Regulation 18 Plan sets out a stepped trajectory as an increase in small site delivery linked to the London Plan would take time to come through. The Urban Design Study has looked at opportunities for change and intensification, and the review to justify the continued protection of open land (found all Green Belt met the purposes for designation, and only some MOL for release). While as a whole London is struggling to meet housing need, the position is that Richmond is seeking to exceed the London Plan target, which is lower given the borough constraints and position in London, often seen as a 'green lung' between other boroughs where development levels are higher. Also noted the Richmond significant affordable housing needs identified in the Local Housing Need Assessment, therefore suggested First Homes will not be acceptable, nor fast track applications for viability in line with the London Plan approach, as seeking to maximise 50% affordable housing.

Elmbridge outlined emerging development strategy focus is on optimisation – predominantly looking at small sites (based on historical patterns), opportunity for intensification, and looking at sites to allocate as much as possible. Elmbridge outlined whole plan viability has been running in the background, and will be renewing with a post-Brexit and Covid-19 update.

As discussed in the past, recognise housing is a **strategic, cross-boundary issue** and there will need to be continued liaison.

- **Gypsies and Travellers**

Richmond outlined research due to be updated, some recent unauthorised encampments but not aware of any patterns of travel as a cross-boundary issue. Elmbridge outlined their research updated in 2020 and expecting to meet need through intensification of existing sites; a new transit site under discussion in Surrey. Elmbridge have done a further riverboat assessment, to address NPPF, and looking at next steps. This could be considered a **strategic issue**, but there do not seem to be pressing cross-boundary issues.

- **Employment**

Richmond outlined evidence base is continuing to justify a restrictive approach. It has previously been agreed this is not a strategic, cross-boundary issue, although both boroughs take a similar approach. Elmbridge outlined taking forward a smaller number of employment areas, those which have only survived due to Article 4 Directions and concerns about employment in some parts of the borough and will be looking at new Article 4 Directions if justified by evidence base.

- **Town centres and retail**

Similar to employment, not identified as a strategic, cross-boundary issue although some shared approaches and impacts. Richmond outlined the initial work on future retail and leisure needs, suggesting need to protect commercial floorspace, with a focus on repurposing existing floorspace and using vacant properties; a more detailed quantitative and qualitative assessment is to be undertaken in 2022.

Elmbridge outlined moving towards core activity areas in main centres, seeking to ensure flexibility and working with economic development officers to go beyond traditional uses, such as social hubs to support communities.

- **Transport infrastructure**

Richmond outlined strong emphasis on active travel, particularly walking and cycling, in the Regulation 18 Plan, which fits with the living locally approach. Post-pandemic we are aware of cuts in service levels for rail and bus, but transport planners suggest expecting some pick up later in 2022, but may not reach pre-pandemic levels, albeit the issue is similar everywhere.

Elmbridge outlined similar uncertainty about future travel patterns. A Transport Assessment is being undertaken, with much work done by Surrey County Council who are preparing a new Surrey Transport Plan - similarly focusing on active travel.

Discussed that due to the River Thames there is limited transport inter-connectivity, hence in the past we have not considered this a cross-boundary issue to be addressed, but noted congestion hot-spots for example around Hampton Court bridge. Discussed continuing to share and liaise over transport issues – Richmond have approached Surrey County Council through these Duty to Cooperate discussions, and also meeting with Transport for London.

- **Water supply and wastewater management**

Not discussed in detail (due to time constraints from this point onwards), but this has not been identified as a strategic issue in the past.

- **Climate change adaption**

*Not discussed in detail, although previously identified flood risk as a **strategic issue**, there continues joint working between both authorities as part of existing joint working arrangements.*

- **Climate change mitigation**

Not discussed in significant detail, but this has not been identified as a strategic, cross-boundary issue in the past. Discussed the need to address the climate emergency is a shared priority, but the focus is within our respective boroughs rather than being able to work between boroughs.

- **Energy infrastructure**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Health infrastructure**

Not discussed in significant detail, but this has not been identified as a strategic, cross-boundary issue in the past. Elmbridge outlined looking at adapting the London Healthy Urban Development Unit model to gain more in terms of health contributions.

- **Schools and education**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Community and cultural infrastructure**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Historic environment**

Not discussed in significant detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Natural Environment**

Not discussed in significant detail, but Richmond outlined the open land review undertaken by Arup finding that all Green Belt met the purposes strongly and recommended for retention, and majority of MOL assessed as performing strongly. Elmbridge outlined a similar approach, with Members approach that everything is integral to the Green Belt and MOL and therefore not amending the boundary. Whilst not a strategic issue, we have previously discussed the importance of the River Thames and the protection of designated open spaces and land for biodiversity value, and it appears a similar policy approach on open land is being taken by both boroughs.

- **Telecommunications infrastructure**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Waste management**

Not discussed in significant detail. Richmond mentioned that the West London Waste Plan is coming up for review.

4. Statement(s) of Common Ground – including timescales, sign off arrangements

Discussed the relative sign-off arrangements in each borough. Elmbridge outlined expecting to approach for a Statement of Common Ground during the Regulation 19 consultation, once the Council’s approach is all confirmed, so likely to be in touch from around spring 2022.

5. Any Other Business including consideration of next steps / future meetings

- Elmbridge Design Code initial consultation to 11 February 2022 – Elmbridge outlined this is considering the whole borough, about how people will be consulted.
- There were no actions identified, but there will be future meetings to continue these conversations and welcomed the dialogue as part of the Duty to Cooperate.

Duty to Co-operate Meeting

Elmbridge Borough Council and London Borough of Richmond upon Thames

Monday 10 July 2023 11:30 – 12:30, Virtual MS Teams
Follow up Meeting 13 July 12:30 to 13:00, Virtual MS Teams

Attendees:

Elmbridge: Suzanne Parkes, Alex Kantepudi-Bird

Richmond: Joanne Capper, Debbie Turner, Oisín Cotter. *Also for follow up meeting on 13 July: David Tidley.*

1. Welcome introductions

2. Brief overview

- **Richmond Local Plan** – at Regulation 19 consultation.
Richmond outlined since we met at the Regulation 18 stage, the main drivers and main approach in the Local Plan have not altered. The further evidence base work and consideration of comments led to some amends to the Plan. Consulting to 24 July and then aiming for submission later in the autumn.
Elmbridge outlined they are looking to respond, it will be a decision signed off by the Cabinet Portfolio Holder (the call-in period will follow).
- **Elmbridge Local Plan** – preparing to submit for Examination.
Elmbridge are looking to submit this summer once all details are lined up including all the Statements of Common Ground.

3. Identification and discussion of strategic and/or cross-boundary issues and priorities -

using the detailed update on the Richmond Local Plan shared on 23/6/23 as a starting point for discussions, likely to focus on housing and flood risk as strategic issues previously identified, which along with transport were considered matters for continued liaison.

Elmbridge had reviewed and identified a number of key topics for discussion during the meeting.

- Overall approach including spatial strategy and site allocations
- Housing including affordable housing

Richmond outlined the overall spatial strategy has not changed since the Regulation 18 Plan. Elmbridge raised the site allocations do not express capacity in terms of unit numbers, and felt the aspirations for sites were not clear, such as the Site Allocation for Platts Eyot. Richmond outlined the format of the site allocations (as in previous Plans) is to set out a vision and broad framework, to allow for details such as capacity to be assessed as part of pre-app and application stage. The Site Allocations have been re-formatted to add clarity about the context. There are three new Site Allocations added in the Regulation 19 Plan but these are not close to the boundary.

Noted Site Allocation 2 for Platts Eyot is similar to the adopted Local Plan, to protect the employment and river-related uses, although in light of Heritage at Risk, and an updated note referring to a fire, there is recognition of limited enabling residential development. Elmbridge felt the allocation was not clear in terms of uses and whether it is appropriate/realistic given constraints such as Green Belt (part of site) and flooding, and therefore unclear whether it would impact across the boundary. Richmond outlined the developer has been looking at confidential preapp proposals, but there is no active wider work on a masterplan. Elmbridge wish to be involved in any masterplan work and this can be shared if it reaches an appropriate stage.

- Gypsies and Travellers

Discussed the Council's updated research which references riverboat dwellers, although not identified needs for additional pitches/moorings. Richmond noted the Mayor of London is preparing a Londonwide study, being undertaken by consultants RRR who have undertaken engagement and surveys, with a draft report expected for boroughs later in 2023.

- Transport infrastructure

Elmbridge raised concerns about the lack of a standalone Transport Assessment. Elmbridge have undertaken a TA and TfL have confirmed this is acceptable (the signed SoCG can be shared with Richmond).

Richmond outlined the broader context (referred to in the updated Infrastructure Delivery Plan), including the declining traffic volumes and the modal shift target in line with the Mayor of London's Transport Strategy. The work referred to in the updated HRA (with consultants WSP) did look at worst case scenarios and the assessment using TfL models found changes in traffic significantly less than the screening criteria, to address the specific HRA issue. Overall Richmond's Local Plan proposes development in line with the London Plan (that was accompanied by a full evidence base), and at much lower levels than surrounding boroughs such as Wandsworth and Hounslow (noting there are no significant site allocations close to the boundary). Richmond outlined it is intending to draw together details into a background topic paper to accompany the submission of the Local Plan. At this stage however, Elmbridge are concerned there are not the details to show the cumulative impact of all of development has been fully assessed, and unsure of what was envisaged in the London Plan evidence at that time.

A separate follow up meeting on transport was organised by Richmond, with the Transport Strategy Team Manager for Richmond and Wandsworth outlining the details around likely transport impacts. This outlined the WSP assessment that has looked at trip generation arising from the site allocations, as well as the impact of other interventions, and identified a small amount of extra traffic movements. Comparing with the TfL LOHAM model and the London Plan work, these are lower than the predictions for 2041. It was noted this does seem to align with the context and modelling in Surrey (led by Surrey County Council as the highway authority). Richmond also outlined there is capacity to increase public transport (where service levels have been reduced post pandemic) and that other interventions (such as by Royal Parks, and a Londonwide congestion zone) have much more significant impacts than the levels of new development. Richmond outlined the intention is to draw this into a

background topic paper and share around mid/late September with Duty to Cooperate bodies, so there is an opportunity to have sight of the details and comment if further information is needed. This will be ahead of submission and can inform Statements of Common Ground for the Richmond Local Plan. It was noted that it is expected that this will be an issue for the Examiner to work through, but Richmond are seeking to be clear at this stage on the context.

Other issues were not discussed in detail, but have not been identified as strategic, cross-boundary issues in the past. It was noted that Surrey County Council would be the relevant body to liaise with over issues such as education, waste, and also regarding transport.

4. **Statement(s) of Common Ground** – including timescales, sign off arrangements
 - Elmbridge – Richmond draft Statement of Common Ground (draft from May 2023 ready to finalise)

Discussed that Elmbridge would revisit the draft and add references to the Richmond Local Plan Regulation 19 so that it is up to date, intending to add transport as a matter. Officers are able to sign off for both Councils, so can be signed in relatively quick timescales.

For Richmond, will be looking at updating our Duty to Cooperate Statement for submission with evidence of these meetings etc. and then consider Statement(s) of Common Ground. May be able to make use of this agreed version, not decided on approach as to whether individual or grouped with all neighbouring authorities, likely to be in touch again in the autumn to discuss drafting and sign off etc.

5. **Any Other Business** including consideration of next steps / future meetings

There were no specific actions identified, but there will be future meetings to continue these conversations as part of the Duty to Cooperate, and upcoming liaison on the Statement of Common Ground. *The follow up meeting noted there will be further liaison on Richmond's background topic paper.*

Duty to Co-operate Meeting

Spelthorne Borough Council and London Borough of Richmond upon Thames

17 January 2022 11am, Virtual MS Teams

Invited attendees:

Spelthorne: Hannah Bridges, Ann Biggs, Jane Robinson

Richmond: Joanne Capper, Joe Roberts, Louis Osman

1. Welcome introductions

2. Brief overview on Richmond and Spelthorne Local Plans

- Richmond Local Plan – at Regulation 18 consultation. Richmond outlined the main drivers for reviewing the Local Plan including the higher housing target in the new London Plan (increased from 315 homes to 411 homes per annum), and responding to the climate emergency. Indicated the housing target is mostly anticipated to be met from incremental intensification, with just one site proposed for MOL release to affordable housing, as the borough's constraints such as heritage, green space restrict opportunities.
- Spelthorne Local Plan – plan on consulting on Regulation 19 Draft Local Plan in Summer 2022, along with Staines Development Framework. Spelthorne outlined making progress on the plan – an exponential change with the current Government objectively assessed need of 618 homes per year, compared to the target of 166 in the adopted Core Strategy from 2009. Aiming to meet the housing need in full, mostly through previously developed land, and only a small release of Green Belt (equating to 0.6%). Preferred Options stage did look at larger Green Belt release but have been able to identify more brownfield sites.

3. Identification and discussion of strategic and/or cross-boundary issues and priorities (using the detailed update on the Richmond Local Plan as a starting point for discussions)

- **Overall approach including spatial strategy and site allocations**

Richmond outlined the approach is updated from the adopted Local Plan, with a new focus on the 20-minute neighbourhood concept and a new set of place-based strategies (covering all of the borough). There is a reference in the Plan to the limited options for alternatives to the spatial strategy, given the borough's constraints which prevent meeting the objectively assessed housing and employment needs, however the Plan is on the basis that there is an identified five year housing land supply to exceed the new London Plan target.

Richmond outlined many of the site allocations are rolled forwards, many of the new and larger site allocations are away from the boundary shared between the authorities. Discussion noted that Thames Water have put forwarded sites, but these are not proposed for Green Belt release. A number of the previous site allocations are moving through the planning application process, some come back again to alter permissions or following refusal/appeals. Richmond officers not aware if other London boroughs have agreed a stepped trajectory, but particularly pertinent for outer London Boroughs where the new

London Plan expects small site intensification to deliver higher housing targets, which will take time to come through. Noted the Mayor of London has set up the Planning for London Programme to begin a review, but has indicated the London Plan 2021 is the right plan for this Mayoral term and beyond.

Spelthorne outlined seeking to plan for best way to meet housing needs, will adapt to any change in Government guidance but need robust policies to determine applications.

Discussed the implications of the Covid-19 pandemic and whether it has affected housing migration patterns, but overall remains uncertainty about longer-term implications which can just be flagged up in terms of the evidence base. Discussed issues around Heathrow and the airport's plans are awaited by the Heathrow Strategic Planning Group, with expansion plans currently on pause.

- **Housing**

As discussed in the past, agreed that housing is a **strategic, cross boundary issue** and there will need to be continued liaison.

Richmond outlined work around the local housing needs and older persons housing – importance of meeting local needs, given emphasis on enabling older people to stay in their homes. Spelthorne outlined need for some family housing, and seen some proposals for older persons housing.

- **Gypsies and Travellers**

Richmond outlined research due to be updated, some recent unauthorised encampments but not aware of any patterns of travel as a cross-boundary issue and will continue to protect the permanent Gypsy and Traveller site at Hampton. Spelthorne have undertaken a needs assessment which identified need for 15 plots for travelling showpeople and looking at a possible site allocation. A transit site has been planned elsewhere in Surrey although a permission is not yet in place.

- **Employment**

Although not identified previously as a strategic issue, there has been a shared concern towards the loss of employment floorspace. Richmond outlined evidence base is continuing to justify a restrictive approach; progressing with Article 4 Direction for Class E to residential. Discussed the uncertainty post-pandemic, particularly for office market. Spelthorne may be seeing increased demand for warehousing; not proposing to release any Green Belt land for employment.

- **Town centres and retail**

Similar to employment, not identified previously as a strategic, cross-boundary issue. Richmond outlined the initial work on future retail and leisure needs, suggesting need to protect commercial floorspace, with a focus on repurposing existing floorspace and using vacant properties; a more detailed quantitative and qualitative assessment is to be undertaken in 2022. Discussed the post-pandemic issues and seeing similar changes on high streets and with the flexibility of Class E that this can be led by the market.

- **Transport infrastructure**

Richmond outlined strong emphasis on active travel. Noted that with no confirmation of funding or timetable for Crossrail 2 (post pandemic aware of cuts to existing rail service levels), it is not mentioned in Richmond's draft Local Plan.

Discussed Infrastructure Delivery Plan work so far. Richmond will be updating to accompany Regulation 19 Plan. Spelthorne have completed a first stage broad overview and not identified any showstoppers.

Discussed Kempton Park racecourse which has been promoted by landowners in the past, as potential transport impact on Richmond; this has been assessed as a strongly performing Green Belt site and not taking forward as a site allocation.

- **Water supply and wastewater management**

Not discussed in detail, but this has not been identified as a strategic issue in the past.

- **Climate change adaption**

We have previously identified flood risk as a **strategic issue** there continues joint working between both authorities as part of existing joint working arrangements.

- **Climate change mitigation**

Not discussed in significant detail, but this has not been identified as a strategic, cross-boundary issue in the past. Discussed that impact on viability is key in determining whether it is justified in going above Building Regulations, as potentially impacts on affordable housing.

- **Energy infrastructure**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Health infrastructure**

Not discussed in significant detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Schools and education**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Community and cultural infrastructure**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Historic environment**

Not discussed in significant detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Natural Environment**

Not discussed in significant detail, but Richmond outlined the open land review undertaken by Arup finding that all Green Belt met the purposes strongly and recommended for retention, and majority of MOL assessed as performing strongly with just one site proposed for release for housing. Spelthorne are only proposing to release Green Belt for housing/Gypsies and Traveller needs. We have previously agreed that Green Belt is a **strategic, cross boundary issue**. Whilst not a strategic issue, we have previously discussed the importance of the River Thames and the protection of designated open spaces and land for biodiversity value.

- **Telecommunications infrastructure**

Not discussed in detail, but this has not been identified as a strategic, cross-boundary issue in the past.

- **Waste management**

Not discussed in significant detail. Noted that the Surrey Waste Plan was recently adopted and the first consultation on a new Minerals and Waste Local Plan is underway; for Richmond the West London Waste Plan is coming up for review.

4. Statement(s) of Common Ground – including timescales, sign off arrangements

Noted Spelthorne will be drafting SoCG closer to Regulation 19 consultation so will be in touch after that.

5. Any Other Business including consideration of next steps / future meetings

- Spelthorne Local Plan Site Selection Methodology Update 2022 – noted sent to LB Richmond, comments requested by 19 January 2022.

Duty to Co-operate Meeting

Surrey County Council and London Borough of Richmond upon Thames

Wednesday 12 July 2023 2:30 – 3:30 pm, Virtual MS Teams

Attendees:

Surrey County Council: Benjamin Brett, Ibrahim Mustafa, Laura Treagus, Nikki Nicholson

Richmond: Joanne Capper, Thomasin Light, Gemma Hotchkiss, Oisin Cotter, Jordan Pratchett

1. Welcome introductions

2. Brief overview on Richmond Local Plan

- **Richmond Local Plan** – at Regulation 19 consultation.
Richmond outlined the main drivers for reviewing the Local Plan including the higher housing target in the new London Plan (411 homes per annum), and responding to the climate emergency.
Richmond outlined the nature of the borough, with a context that brings opportunities but also constraints, and similarities shared with Surrey authorities.
 - **Updates from Surrey County Council** including the new Surrey Minerals and Waste Plan. Surrey outlined since the Issues & Options consultation on the Minerals and Waste Local Plan finished in March 2022, extended the timetable due to a number of factors (including a lack of waste sites) and now looking at starting Preferred Options consultation in June 2025, and planning another Call for Sites, with adoption anticipated in 2027.
The adopted Minerals Plan period runs until end of 2026 so there could be around a year without an adopted up-to-date Plan, however most developments are long-term and not expecting strategic developments relating to minerals in that period. Discussed no new minerals sites have come forward for a while, with three remaining allocations to come forward – closest to the shared boundary is King George VI Reservoir (Stanwell) although noted further within Spelthorne and not previously identified any cross-boundary issues.
3. **Identification and discussion of strategic and/or cross-boundary issues and priorities** - the detailed update on the Richmond Local Plan shared on 30/06/23 can be used as a starting point for discussions, focusing on the matters dealt with at county level particularly minerals and waste.

SCC's Spatial Planning team are preparing the overall response although are still waiting to hear back from some internal colleagues to collate comments in relation to transport, education, flooding etc. It was noted that reference to the River Thames Scheme in Policy 8 is welcomed but no other details are set out, and a Regulation 19 response will also be sent directly on behalf of the River Thames Scheme.

Discussed approach to **waste management**. For Richmond, the London Plan sets waste apportionment figures. Policy 7 in the Local Plan covers waste and the circular economy including safeguarding of existing waste sites, but largely signposts to policies in the West London Plan Waste Plan (WLWP). The WLWP was adopted in 2015 and due for review by 2031. Richmond outlined its review is starting to commence; discussions are ongoing to set up the joint working, with a Memorandum of Understanding being finalised and the project management being undertaken by the West London Alliance, and the first officer meeting is scheduled for the Autumn.

The intention is that the emerging WLWP, as it forms part of the development plan for Richmond, can be read alongside the Local Plan. The WLWP process will also involve a call for sites, look at needs and can look for new sites. The Richmond Policies Map can be updated on adoption of a new WLWP, if there are updated designations.

It was noted that Site Allocation 12 The Stoop (Harlequins Rugby Football Club) is adjacent to Twickenham Depot, a safeguarded waste site. This is the Council's waste transfer site, so the existing context already includes nearby the stadium, residential and leisure uses. The landowner is promoting consideration of a wider scheme, but the Site Allocation boundary remains for the ground and supporting continued sports uses. Consideration of any potential impacts would be covered by other Plan policies.

It was noted that movements of waste between Richmond and Surrey do not meet the threshold for strategic movements, but there is a hazardous waste stream going to landfill at Redhill - Patteson Court. The planning permission for that site is due to expire at the end of 2030, unless an extension is applied for but it has not come forward yet.

Action: contact details for the project manager leading the WLWP review to be shared with SCC minerals and waste officers. TL to keep SCC up to date where necessary.

4. **Statement(s) of Common Ground** – including timescales, sign off arrangements

For Richmond, will be looking at updating our Duty to Cooperate Statement for submission with evidence of these meetings etc. and then consider Statement(s) of Common Ground depending on any outstanding issues raised. Surrey County Council can sign off Statements of Common Ground at officer level.

5. **Any Other Business** including consideration of next steps / future meetings

- Surrey County Council interested in any infrastructure works involving extraction and potential minerals implications. No significant new infrastructure is planned in the borough associated with the Local Plan, but the Thames Water proposal for an abstraction scheme (for London and the South East) does include tunnel elements in the borough so could be relevant to review. If any other infrastructure projects are identified in future, details can be shared. While no further meetings were identified, liaison can continue through the Duty to Cooperate.

Duty to Co-operate Meeting

GLA, TfL and London Borough of Richmond upon Thames

20 January 2022 10:30, Virtual MS Teams

Attendees:

GLA: Nina Miles, Jennie Cullern, Lisa Fairmaner

TfL (some joined specifically for the discussion on Transport): Richard Carr, Sarah Hoad, Alison Bradshaw, Lucy Simpson

Richmond: Andrea Kitzberger-Smith, Joanne Capper, Joe Roberts, Gemma Hotchkiss, Blanka Hay, Will Marshall

1. Welcome introductions

2. Brief overview on Richmond Local Plan

- **Richmond Local Plan** – at Regulation 18 consultation. Richmond outlined the main drivers for reviewing the Local Plan including the higher housing target in the new London Plan (increased from 315 homes to 411 homes per annum), and responding to the climate emergency. The Direction of Travel consultation was in 2020, pre the pandemic, and now progressed initial evidence base work. Richmond outlined the context of the patterns of development seen in the borough, generally along the transport corridors from London, and a significant amount of designations which constrain development.

3. Identification and discussion of strategic and/or cross-boundary issues and priorities (using the detailed update on the Richmond Local Plan circulated in January 2022 as a starting point for discussions)

- **Overall approach including spatial strategy and site allocations**

Richmond outlined the approach is updated from the adopted Local Plan, with a new focus on the 20-minute neighbourhood concept and a new set of place-based strategies. Richmond outlined many of the site allocations are rolled forwards, there are eight new site allocations proposed. Discussed the Plan is based on a clear evidence base to justify local constraints and the rationale for certain policy directions.

The GLA noted a number of Site Allocations (part) in MOL and allocated for leisure e.g. Richmond Athletic Association Ground, Twickenham Stadium. Some Site Allocations have always been to recognise important local sites that bring visitors/tourists, where impacts may need to be managed, and some have aspirations e.g. for some residential, so the SAs set out the overall vision for sites.

Richmond outlined a comprehensive Open Land Review (Green Belt, MOL, LGS and OOLTI) undertaken. One site (Car park for Sainsbury's, Uxbridge Road, Hampton) is proposed for MOL release for 100% on-site affordable housing, and proposing to remove some front gardens. Some of the MOL was originally designated in the 70s/80s and no details on the rationale for its inclusion, but the majority found to be meeting the relevant criteria for designation. About 66% of the borough is MOL/GB.

Discussed some of the other large Site Allocations. Kew Retail Park expecting to come forward. Discussed the impact of some on retail e.g. Homebase and Sainsburys East Sheen and whether may impact on town centre boundaries which could be reviewed e.g. to encourage pedestrian links. Noted that TfL Commercial Development would comment on Fulwell Bus Garage.

- **Housing including affordable housing**

Previously considered a **strategic issue** for continued liaison. Richmond outlined the Local Housing Needs Assessment and an Urban Design Study have informed the Plan. Meeting the higher housing target in the London Plan will be a challenge expecting increase from small sites delivery, and putting forward in the Plan a stepped housing trajectory.

The GLA noted seeking to meet the London Plan target, although there is a specific approach in paragraph 4.1.11 on carrying forward a target beyond the 10 year period which should be followed. The GLA noted on older person's housing the Richmond target is a lot lower than the benchmark in the London Plan and needs clarification.

Richmond outlined on affordable housing, affordable rent remains the highest priority, but Policy 11 reflects the London Plan tenure split; First Homes and a fast-track viability threshold approach are not considered appropriate in the borough context, because of the significant affordable housing need and as the borough has such a limited supply of large sites – related to viability and deliverability. The GLA highlighted concerns and not following the threshold approach as this raises an issue of **general conformity**, as the GLA's evidence is delivery has increased since the fast-track was introduced, and would like to see the evidence for whether this would work given historical under-delivery in the borough.

- **Gypsies and Travellers**

Although not identified previously as a strategic issue, Richmond outlined research due to be updated. The GLA emphasised need to meet pitch requirements if identified.

- **Transport infrastructure**

Transport has been identified as a **strategic issue** in the past. The GLA highlighted that modelling / strategic transport assessment would be useful to tie existing work with strategic sites e.g. Stag Brewery, Kew Retail Park, with some interest from highways officers/DM, although noted this is not related to any conformity issue. There can be separate discussions about the modelling available, costs etc. to explore this. Other boroughs may be doing and Highways England may raise, but depends on the borough context and what development is being brought forward. For Richmond, overall development is in line with the London Plan, with emphasis on Living Locally and walking/cycling for short journeys and the Healthy Streets approach.

TfL welcomed the approach to parking and cycle parking in the Plan, but noted some of the Site Allocations are out of step and need to be reviewed where there may not be justification for parking. Discussed important protection of bus stops/stands and transport contributions from developers in relation to some of the Site Allocations, providing can be justified.

- **Employment**

Not previously identified as a strategic issue, but there has been a similar approach towards protecting employment land. Richmond outlined evidence base is continuing to justify a restrictive approach. The GLA indicated their support for protecting existing employment

space, seeking intensification and directing workspace to town centres, reflecting London Plan including Policy E7 and E1 which references walking and cycling connectivity.

- **Town centres and retail - linked with Community and cultural infrastructure and visitor economy**

Richmond emphasised taking a positive approach to diversification of centres, including in the place-based strategies and recognising the importance of smaller centres to the Living Locally concept. Recognise the day and night offer, and looking to identify Cultural Quarters in Richmond and Twickenham and then recognise cultural hubs elsewhere. Plan recognises residential can be appropriate on upper floors/to rear. Article 4 on Class E to residential due to be in confirmed in summer. The initial work on future retail and leisure needs, suggesting need to protect commercial floorspace, with a focus on repurposing existing floorspace; a more detailed quantitative and qualitative assessment is to be undertaken in 2022.

The GLA indicated their support for the approach to repurposing vacant stock and diversification. Policy 19 could mention the Agent of Change as set out in London Plan Policy D13.

- **Water supply and wastewater management**

Not discussed in detail, but this has not been identified as a strategic issue in the past.

- **Climate change adaption**
- **Climate change mitigation**

While this has not been identified as a strategic issue in the past, recognising the need to address the climate emergency is a shared priority. The Mayor now also has set a target for London to be net zero carbon by 2030.

Discussed Richmond's ambitions to go beyond the London Plan, which requires a strong evidence base particularly around viability, for on-site reduction, small sites, and carbon-offset. Richmond will be looking at further evidence on climate change and the whole plan viability. Discussed how priorities such as climate change and affordable housing need to both be addressed from a strategic perspective.

Discussed some detailed aspects of the London Plan and Local Plan. For example energy demand and carbon emissions monitoring data should be for at least five years, and the environmental standards in the London Plan would not be met if gas boilers are fitted.

- **Energy infrastructure**

Not discussed in detail, but this has not been identified as a strategic issue in the past.

- **Health infrastructure**

Not discussed in detail, but this has not been identified as a strategic issue in the past.

- **Schools and education**

Not discussed in detail, but this has not been identified as a strategic issue in the past.

- **Historic environment**

Although this has not been identified as a strategic issue in the past, there is significant emphasis in the draft Plan on the borough's historic environment with policies to protect heritage assets and set a presumption in favour of refurbishment. The GLA raised some

areas where it was felt details should be set out in policy, not just supporting text – the requirement for heritage assessments for proposals affecting Kew WHS, and the principles of London Plan Policy HC4 London View Management Framework for the strategic view King Henry VIII's Mound to St Paul's Cathedral.

Richmond outlined the Urban Design Study has identified tall and mid-rise building zones. There is flexibility for future mid-rise development to come forward outside of the mid-rise zones. The GLA indicated the Plan sets an approach for tall buildings with clear maximum building heights in appropriate designated areas, which appears to meet London Plan expectations.

- **Natural Environment including Open Land Review**

Not discussed in further detail, as not identified previously as a strategic issue. Although there is a need for a consistent approach to Green Belt and MOL across London, as discussed under the spatial strategy and site allocations above.

GLA raised a specific point about play space, and the need to ensure policy recognises informal recreation facilities as much as formal provision. Paragraph 5.4.2 in the London Plan emphasises this, can link with the Healthy Streets Approach.

- **Telecommunications infrastructure**

Not discussed in detail, but this has not been identified as a strategic issue in the past.

- **Waste management**

This has not been identified as a strategic issue in the past. Noted the West London Waste Plan is due for review by 2031, and how the borough may manage the gap prior to that in the London Plan.

4. Statement(s) of Common Ground – including timescales, sign off arrangements

Noted Richmond will be drafting SoCG closer to submission so will be in touch.

5. Any Other Business including consideration of next steps / future meetings

- Richmond raised partnerships representing – liaison with GLA covers the London Enterprise Partnership; advise to check the Government website for the Local Nature Partnership and suggest via London Wildlife Trust and Natural England.
- The GLA updated on the Planning for London Programme. This will inform the new London Plan in the next Mayoral term. Aiming to understand a breadth of views across London - targeting diverse groups of people to understand views about London, making a library of information to inform how the GLA think of London in the future rather than meeting with individual groups. There is a call for evidence, followed by phases of engagement, including through 'Talk London', polls, and deep-dives, to produce an initial range of options.

Duty to Co-operate Meeting

GLA and London Borough of Richmond upon Thames

Tuesday 11 July 2023 1-2:30pm, Virtual MS Teams

Attendees:

GLA: Jonathan Blathwayt, Monika Jain, Hassan Ahmed

Richmond: Andrea Kitzberger-Smith, Joanne Capper, Debbie Turner, Oisin Cotter

1. Introductions

2. Richmond's Reg 19 Consultation/General Conformity Statement

The GLA had reviewed and identified a number of key issues to discuss, ahead of their formal response.

The GLA identified the key issue related to housing and affordable housing is the fast-track viability threshold, as this is considered not in conformity with the London Plan. This was raised in the GLA's comments at Regulation 18 and on the draft Affordable Housing SPD, so requested the reasoning why the policy approach has not been altered. Richmond outlined that the policy approach on affordable housing is really driven by the local circumstances - the significance of local affordable needs and the pipeline with such a limited supply of sites. There had been consideration of a number of policy options on overall percentage and tenure split, and approach on large and small sites. From the borough perspective there will be lost opportunities on large sites to secure units, as the 35% threshold would be perceived by developers as a minimum, and it prevents the scrutiny of viability and potential use of Richmond Council's Housing Capital Funding to see if affordable provision has been maximised, which is the Council's aspiration.

The GLA outlined that across London as a whole delivery has increased since the 35% threshold was introduced, as set out in the [London Plan AMRs](#) i.e. the highest proportion of affordable homes secured in strategic schemes approved by the Mayor (38%) since the data was first recorded in 2011 - this compares with 25% in 2016, and is the equivalent of 43% affordable housing when measured by habitable rooms. The GLA's intention is to embed the requirement into land values, and are concerned at different approaches within boroughs.

For Richmond, there are few large sites and many policy asks, and viability is often raised due to high land values, so it is acknowledged past affordable housing delivery overall is low. The Whole Plan Viability Assessment has now been undertaken, and while there is a mixed picture there are many types of development envisaged that in some parts of the borough should be able to deliver higher percentages. Officers in planning and housing look at viability, along with independent assessors, but it is often the case that the right tenure and type of affordable housing will deliver significant local benefits, more so than just the number of affordable units.

Officers agreed that any further work to understand the impact of the threshold approach at the borough level would help to inform further discussions ahead of and during the Examination.

A number of other points on housing were raised by the GLA. The need to clarify in policy the overall housing target, and look beyond the ten year target to 2029, including if the end date should be to 2040/41. The maps of the tall building zones are not particularly clear. The older person's housing target should be explained in more detail. The release of one site, and front garden sites, from MOL was noted.

3. Duty to Cooperate Update

Richmond outlined undertaking number of Duty to Cooperate meetings including with neighbouring authorities, and will be looking at updating our Duty to Cooperate Statement for submission and then draft Statement(s) of Common Ground in the autumn.

4. Local Plan Next Steps/Timetable

Richmond outlined it is intending to draw together details into a background topic paper to accompany the submission of the Local Plan, including on housing delivery and affordable housing.

There is delegated authority already in place for the Chief Planner to take forward the Local Plan in liaison with the Chair of the Environment Committee to submission and Examination.

Richmond to contact TfL separately, as not yet liaised with the GLA.

5. Any Other Business

- **Teddington Police Station** – Richmond raised if there was any update on MOPAC's disposal of the site. GLA understand MOPAC's Estates Strategy is still being reviewed.
- Mayor's consideration of **Homebase, Manor Road** - Richmond raised if any update on determination, to inform future delivery pipeline. *GLA supplied the case officer details after the meeting.*

Duty to Co-operate Meeting
Environment Agency and
London Borough of Richmond upon Thames

19 January 2022 2pm, Virtual MS Teams

Attendees:

EA: Ajit Gill, Rachel Holmes, George Goodby

Richmond: Andrea Kitzberger-Smith, Joanne Capper, Eoghan McConville, Louis Osman, Sebastien Trinckvel

1. Welcome introductions

2. Brief overview on Richmond Local Plan

- **Richmond Local Plan** – at Regulation 18 consultation, accompanied by Sustainability Appraisal, Habitats Regulation Assessment, and Flood Risk and Development Sequential Test. Richmond outlined the main drivers for reviewing the Local Plan including the higher housing target in the new London Plan (increased from 315 homes to 411 homes per annum), and responding to the climate emergency. The Direction of Travel consultation was in 2020, pre the pandemic, and now progressed initial evidence base work.

3. Identification and discussion of strategic and/or cross-boundary issues and priorities (using the detailed update on the Richmond Local Plan circulated in January 2022 as a starting point for discussions)

- **Overall approach including spatial strategy and site allocations**

Richmond outlined the approach is updated from the adopted Local Plan, with a new focus on the 20-minute neighbourhood concept and a new set of place-based strategies. There is a reference in the Plan to the limited options for alternatives to the spatial strategy, given the borough's constraints. Richmond outlined many of the site allocations are rolled forwards, there are eight new site allocations proposed.

The EA outlined the main issue relates to fluvial flood risk and factoring in climate change. For the Site Allocations, need to factor in the latest **climate change allowances** and the proximity to flood defences. The latest allowances modelling was incorporated into the SFRA (2020).

The Draft Local Plan proposes (Policy 8) submitted FRAs will have to utilise the 'upper end' climate change scenarios when implementing the climate change allowances for surface water and fluvial flood risk, which was recommended in the SFRA. The EA raised that although the ambition is recognised, the EA work in line with Government guidance which is not utilising the upper end scenarios. Although revised guidance on climate change allowances is going to be produced, it will reflect the Government position. There is uncertainty that the EA's flood risk team could resource and support a different policy approach, as it creates practical implications. There can be more discussion of the merits and approach.

Discussed in detail a number of the **Site Allocations**:

- St Mary's University: the footprint of any building(s) could seek to avoid areas of flood risk.
- Platts Eyot: the EA raised treating islands as if in zone 3b, and that would raise an in-principle development. The emphasis in the vision is to continue as an employment site, and a framework for future proposals to be assessed against.
- Stag Brewery: in close proximity to the flood wall. Aware already reached planning application stage, but the EA raised there is an opportunity to secure river enhancements.
- Twickenham Riverside: also a general vision, with the Council bringing forward a mixed use scheme. The EA raised there is an opportunity to secure river enhancements.
- Kew Retail Park: noted being brought forward for residential, a substantial site, in zone 3a.

- **Water supply and wastewater management**

An issue of local concern is the capacity of the existing sewer system to cope with increases in heavy rainfall events. In terms of water discharge, EA mostly comment on any water discharge and that it is clean i.e. ensuring water quality and avoiding any land contamination. The responsibilities are with Thames Water.

- **Climate change adaption**
- **Climate change mitigation**

We have in the past recognised our very effective working relationship between the Council and the EA on flood risk matters, with strategic priorities for the EA and the borough identified as the River Thames Scheme, Thames Estuary 2100 Plan and the Water Framework Directive. It is recognised that the need to address the climate emergency is a shared priority. We have in the past discussed maintaining policy approaches to open spaces and biodiversity, and recognising river corridors as a key part of the green/blue infrastructure network.

Noted generally for **islands** and new development would treat as zone 3b e.g. if making existing single-story residential buildings bigger by adding an additional floor, that could provide safety on the second floor.

- **Natural Environment**

Generally the EA would like to see **river enhancements** where proposals come forward with a stretch of riverside development. There may be constraints due to viability, and balanced with other contributions on particular sites. Richmond will be commissioning a Whole Plan Viability Assessment. EA emphasis is on opportunities when flood defences are raised, repaired or replaced, with multi-functional benefits including for public space, access, habitats.

The opportunities for river enhancements are linked to **Biodiversity Net Gain (BNG)**. Discussed the Natural England small sites metric, and that details are still to come. Noted Richmond asking for 20%, above the legal level of 10% being put forward by Government, which will again need to be considered through the viability evidence. For example, on a site with a river running through it, the net gain should be to river enhancements, for aquatic species, not just about planting trees on the site.

4. Statement(s) of Common Ground – including timescales, sign off arrangements

Noted Richmond will be drafting SoCG closer to submission so will be in touch.

5. Any Other Business including consideration of next steps / future meetings

None discussed.

Duty to Co-operate Meeting

Environment Agency and London Borough of Richmond upon Thames

Tuesday 18 July 2023 11am, Virtual MS Teams

Attendees:

Environment Agency: Ajit Gill, Rachel Holmes, Hannah Perriton

Richmond: Andrea Kitzberger-Smith, Joanne Capper, James Greene, Thomasin Light, Christina Sirl

1. Welcome introductions

- 2. Brief overview on Richmond Local Plan** - at Regulation 19 consultation on the draft Plan, accompanied by updated Sustainability Appraisal, Habitats Regulation Assessment, and Flood Risk and Development Sequential Test.

Richmond outlined since we met at the Regulation 18 stage, the main drivers and main approach in the Local Plan have not altered. The further evidence base work, such as the Net Zero Carbon Study, and consideration of comments led to some amends to the Plan.

Consulting to 24 July and then aiming for submission later in the autumn.

The EA outlined they have notified internal consultees and still awaiting some responses, but will be submitting the EA response ahead of the deadline.

- 3. Identification and discussion of strategic and/or cross-boundary issues and priorities** - the detailed update on the Richmond Local Plan shared on 26/06/2023 can be used as a starting point for discussions, likely to focus on climate change adaptation, in terms of flood risk and sustainable drainage, and the natural environment, particularly in respect of biodiversity and river corridors, as strategic issues.

Richmond outlined they consider that the Plan continues to take a strong approach to climate change adaptation and the natural environment, and some of the amends made since the Regulation 18 version.

A number of technical requirements have been amended in Policies 8 and 9, with further clarification added e.g. around water quality. Further to the previous discussion at Regulation 18 stage, amended to reflect use of the 'central' scenarios for climate change allowances, which the EA noted and appreciated as overall bringing into line with Government advice.

Richmond outlined the Site Allocations have all been reformatted. Although they set out a broad vision in terms of land uses, there is now a detailed 'context' section so should capture details around existing constraints such as flood risk.

Discussed requirements around biodiversity net gain. The EA asked about the aspects still not confirmed from the Environment Act. Richmond outlined the case to go for 20% and seek from small sites, which is based on local circumstances and will need to be set out for

the Examination. There is synergy with the EA aims where small sites may be next to rivers and net gain can be achieved cumulatively including for aquatic habitats.

Noted the EA advocate a Riverside Strategy Approach, with emphasis on multiple benefits to flood risk, biodiversity and public realm. Although in places Richmond had not added this specific wording into the Plan, it was as all the strands were already considered adequately covered within policies.

The EA noted the policy in regard of flood defences has been strengthened, with further clarification on set back distances added to the Plan, which secures protection and is supported.

An updated Thames Estuary 2100 Plan has been published since the Regulation 18 Plan, which brings forward the first milestone for raising defences to 2050. The EA response will suggest some of the policy wording will need to be changed to align with this. This has been the first review, with major reviews planned for every 10 years, and discussed there may need to be wording to future proof the Plan i.e. not referencing specific epochs, but that development is in line with the TE2100 Plan recommendations.

It was noted that a similar approach to the Wandsworth Local Plan (as accepted by the Inspectors) has been taken to require a justification for exceptional circumstances in assessing meterage set back in the application of policy. There are references to finished floor levels for areas in fluvial and tidal flood risk. There is reference to ensuring no new active flood defences are developed. In line with the strong approach in the PPG, these elements in the Plan will provide a good basis for the EA commenting on applications.

In Policy 8 the detailed references to the 'central' scenarios for climate change allowances would not be correct for some forms of development such as essential infrastructure. The EA response will suggest reference to gov.uk climate change guidance, as that also future proofs the policy if that guidance is changed.

Discussed the definition of a functional floodplain and whether would be using the SFRA definition (using 1 in 20 year return period events) or whether would consider a different approach based on the new PPG guidance. Richmond clarified there are no plans to commission further bespoke modelling and therefore would be continuing with the SFRA approach. Although it is understood that a precautionary approach is being promoted in the new guidance, there aren't any other SFRA's that have been undertaken since the PPG update.

The context for the Site Allocation for Platts Eyot was discussed, noting the update to the Sequential Test Report to reflect the 'more vulnerable' proposed use with potential enabling residential. The EA noted if access/egress is within Flood Zone 3b then the site is treated as functional floodplain; it would be up to a developer to suggest if there can be safe access/egress.

Noted Richmond are not planning to undertake a Level 2 SFRA. The Sequential Test Report supports the Local Plan, and has been updated with Metis setting out all the details, with any errors raised now corrected. There are no plans for any additional reports.

4. **Statement(s) of Common Ground** – including timescales, sign off arrangements

Richmond will be looking at updating the Duty to Cooperate Statement for submission with evidence of these meetings etc. and then consider Statement(s) of Common Ground, likely to be in touch in the autumn.

5. **Any Other Business** including consideration of next steps / future meetings

- LBRuT Local Plan Monitoring: AMR on EA Consultation ([previous report 2013-16](#)) – discussed officers currently finalising a report covering 2016/17 to 2021/22.

Duty to Co-operate Meeting

Historic England and London Borough of Richmond upon Thames

Tuesday 18 July 2023 1:30 – 2:30 pm, Virtual MS Teams

Attendees:

Historic England: Tim Brennan

Richmond: Joanne Capper, Lauren Way, Gemma Hotchkiss, Joanne Simpson

1. Welcome introductions

2. Brief overview on Richmond Local Plan

- Richmond Local Plan – at Regulation 19 consultation on the draft Plan, accompanied by updated Sustainability Appraisal and Habitats Regulation Assessment. Richmond outlined the main drivers for reviewing the Local Plan including the higher housing target in the new London Plan (411 homes per annum), and responding to the climate emergency. Since the Regulation 18 consultation, further evidence base work and consideration of comments led to some amends to the Plan, although the main approaches have not altered. Richmond outlined the nature of the borough, with heritage assets and the related historic and natural environment intrinsic to the borough's character, and often seen as constraints.

3. Identification and discussion of strategic and/or cross-boundary issues and priorities – using the detailed update on the Richmond Local Plan shared on 30/06/23 as a starting point for discussions, likely to focus on the historic and natural environment as strategic issues.

Historic England have already started assessing the Plan and drafting a response on the Regulation 19 Plan. On the whole, Historic England's comments on the Publication Regulation 18 stage were largely happy with the Plan, but some concerns around Site Allocations.

Historic England raised there appears to be a gap between arriving at capacity and design parameters, as they are looking for an assessment of the significance of the heritage assets so that is taken into account in the policy approach. This relates more so to those Site Allocations with listed buildings within the site such as Site Allocation 10 St Mary's University where there could be more clarity about where development is going to happen, and how it should take account of significance of heritage assets.

Richmond outlined the overall spatial strategy has not changed since the Regulation 18 Plan. The Site Allocations have been re-formatted to add clarity about the context, with three new Site Allocations added in the Regulation 19 Plan. Richmond outlined the format of the site allocations (as in previous Plans) is to set out a vision and broad framework, to allow for details such as capacity to be assessed as part of pre-app and application stage. The Urban Design Study has included a boroughwide character assessment, but at site level it would depend on whether there has already been work as part of pre-app or application proposals, such as the Stag Brewery with applications already under consideration.

Historic England are looking for understanding what contribution the wider site in its current form makes to heritage significance and then assessing what the allocation would have on that significance as an important starting point. This can then be used to inform development parameters and site capacities that avoid harm and identify opportunities for enhancement. This approach also aligns with London Plan Policy D3 Optimising Site Capacity and its associated London Planning Guidance, which looks for the evidence-base relevant to considering site capacity and using that context to inform design. This is really important for Historic England on certain sites which are so sensitive to change, and being part of a positive strategy.

Historic England raised concern about the tall building zone for Kew Retail Park (Site Allocation 31) and seeking clarity about the justification for its siting.

Discussed in terms of climate change and the need for retrofit measures to historic buildings to be appropriate interventions and avoid maladaptation. Richmond outlined reference to avoiding maladaptation had been added into the Regulation 19 Plan, and happy to consider any further specific additional wording. Historic England suggested further signposting, including to guidance and highlighting the dangers of inappropriate interventions and taking the approach to build up iterative interventions, and recognising the importance of monitoring energy performance.

Discussed in relation to Kew World Heritage Site and the need to reference Outstanding Universal Value within the policy as the central purpose is to conserve its heritage significance. Richmond felt this was covered, but happy to consider any further specific additional wording.

4. **Statement(s) of Common Ground** – including timescales, sign off arrangements

Richmond will be looking at updating the Duty to Cooperate Statement for submission with evidence of these meetings etc. and then consider Statement(s) of Common Ground, likely to be in touch in the autumn.

5. **Any Other Business** including consideration of next steps / future meetings

None discussed.

HEALTH AND WELLBEING BOARD

Minutes of the meeting held on Thursday, 17 March 2022.

PRESENT: Councillor Piers Allen (Chair), Dr Patrick Gibson (Vice-Chair), Councillor Suzette Nicholson, John Anderson, Ian Dodds, Vicki Harvey-Piper, Shannon Katiyo, Dr Kate Moore, Mark Titcomb, Kathryn Williamson and Denise Madden

19. WELCOME & APOLOGIES

Apologies were received from:

- Tonia Michaelides who was substituted by Vicki Harvey Piper virtually from 2pm
- Liz Bruce
- Jo Farrar who was substituted by Denise Madden
- Councillor Wilson
- Councillor Marcel
- Mark Maidment
- Dr Nick Grundy
- Sara Challice
- Alex Berry

20. DECLARATIONS OF INTEREST

There were no declarations of interest.

21. MINUTES

RESOLVED that the minutes of the meeting on Thursday 13 January 2022 be approved and the Chair authorised to sign.

22. PUBLIC INVOLVEMENT

There were no registered speakers on this occasion.

23. PROGRAMME OF FUTURE MEETINGS

RESOLVED that the programme of future meetings be **NOTED**.

24. PROGRESS OF THE RICHMOND LOCAL PLAN

Joanne Capper (Principal Policy and Information Planner) presented the report.

Once adopted the policies in the Local Plan would be considered when planning applications were brought before the borough. It was therefore a key document. There was a role for place-making, protecting land uses and setting out where change was envisaged. The current Local Plan was a review of that adopted in 2018.

The Local Plan took about 4 years to prepare and was subject to a public examination as part of it to ensure it was deliverable. The Council was reliant on other partners to deliver it.

It was recognised that health was a partner in delivering services. There were relatively well-established links with the CCG and Public Health. Examples of links with health were restrictions on the establishment of new fast-food takeaways near to schools through the planning process because of the impact of childhood obesity.

The HWB were asked to note the current position on the development of the Local Plan including the issues. It was still quite early in the process. The draft health impact assessment had been undertaken and included in the agenda paper for this item. The CCG's response to the consultation had also been included for information. All the comments that had been received during the consultation were being considered and further evidence. The Council's final version of the Local Plan would be going to the Environment, Sustainability, Culture & Sports Committee in autumn 2022, after which there will be another round of public consultation. Further work would be undertaken as part of writing the final Local Plan to address the issues under consideration. The draft Local Plan contained a vision including strategic objectives. Much had changed as a result of the pandemic and the impact of this was still being assessed.

In response to questions from HWB the following additional points were made:

- There were new practitioners coming into the primary care field as the sector expanded. There was already pressure on the estates. Co-production going forward would be very important.
- There should be common standards around information governance between partners such as primary care and the voluntary sector.
- The Local Plan was important in terms of the impact on health. Public Health had worked collaboratively with Planning on the Local Plan. The environment has an impact on life expectancy and health outcomes. The priorities identified from the JSNA had been reflected in the Local Plan. There should be health impacts assessments for major developments in the borough. Public Health had drafted guidance for the website to support developers to consider when putting plans in place. This could be reflected more in officer reports.
- There should be more consultation with Public Health and other partners on developments with a considerable impact on health and wellbeing in the borough.
- Supported living should be looked at.
- There should be greater emphasis on support for carers and prevention which were key themes of the H&CP.
- There should be consideration of work to investigate corridors that people used on the way home from school and work when considering approval of fast-food establishments.
- The move towards locality working bringing partners into the community should be reflected in the developing Local Plan.
- The comments of the CCG were endorsed and reinforced.
- The opportunity to look at the 20 minutes neighbourhoods concept and its linkages with health and care should be investigated.
- It was suggested that officers liaise with other neighbouring Southwest London boroughs to see what lessons could be learnt through their healthy high streets regeneration projects, in terms of

- bringing services closer to communities. Merton had a pilot scheme.
- The affordable housing and housing mix should reflect the spectrum of key workers.
 - The involvement of Public Health on the local design coding process was welcomed.
 - The mental health provider collaborative was putting together its transformation programme. It would be useful to link this with the quality of housing and employment opportunities. There should be an emphasis on prevention from early years. There were some initiatives around the South London Listens Mental Health Scheme, and it would be useful to ensure that its priorities were reflected in the Local Plan
 - There should be consideration on how to further involve the wider community in the consultation process and get stakeholder buy-in to the Local Plan.

RESOLVED that Health & Wellbeing Board

- i. Note the progress to date on the Richmond Local Plan and the anticipated timetable to adoption.
- ii. Note the approach in the Draft Local Plan to health and wellbeing, and how this relates to the work of the Board, and provide any appropriate insight to inform the next steps.

25. RICHMOND HEALTH & CARE PLAN 2022-24 REFRESH

The Health and Wellbeing Board Partnerships Manager (Priya Samuel) and Denise Madden (Kingston Hospital NHS Foundation Trust) presented the report on the Health & Care Plan (H&CP).

An exercise of public engagement had taken place throughout December 2021. The feedback had been shared with HWB. It been refreshed in accordance with the 3 life course themes (start well, live well and age well). A multi-agency task & finish group oversaw the refresh. It focused on the key priorities that would make an impact within a 2 year period.

There were 4 overarching themes:

- Carers
- Tackling inequalities
- Healthy weight
- Mental health

In response to questions, the following additional points were made:

- The plan that was presented to HWB was a high-level summary. Contained beneath was an operational plan which outlined the actions which would deliver its priorities. Partners would agree which actions would support those with dementia and their families/carers. This was reflected in the life course themes. There were local examples where local services and non-clinical setting could be made more dementia friendly.
- There were not new areas of work being created within the H&CP , rather they were existing areas of work or would be commencing within the two-year period.
- The H&CP was across the system and it had a shared set of outcomes. The Actions for partner organisations to undertake would be allocated. There was a emphasis on shared outcomes. The actions for the H&CP were orientated towards shared outcomes for all partner organisations.
- An Implementation Delivery Group was proposed to monitor delivery. It would take a partnership approach and would oversee the implementation plan. It would analyse what metrics could be used to measure the outcomes in the H&CP. Some of the actions would be a longer-term process. This would require resource from partners. It would mirror the Task & Finish Group approach. The wider impact of health and wellbeing upon other local determinants was recognised. The Task & Finish Group was recognised as an exemplar example of partnership working.
- The human resource needed towards the completion of the refreshed H&CP was significant. Longer intervals between updates should be considered to better demonstrate outcomes and not divert resource in writing a new H&CP.
- The H&CP priorities were aligned with those in London Borough of Hounslow. Many residents in Richmond used services at West Middlesex Hospital.
- Three would be an engagement process using existing channels to promote the H&CP and enable feedback to take place.
- The final plan would come to HWB in July 2022 and thereafter there would be updates every 6 months to HWB.

RESOLVED that the Health and Wellbeing Board

- i. Approve the Richmond Health & Care Plan 2022-24 Summary and accompanying Plans On a Page for each Life Course theme.
- ii. Promote and use the Health & Care Plan 2022-24 across its networks.
- iii. Agree and support the creation of a Health & Care Delivery Group.
- iv. Agree the reporting format and timeframes to receive Health and Care Plan delivery presentation to the Health and Wellbeing Board

26. BETTER CARE FUND METRICS PERFORMANCE UPDATE

Brian Roberts (Lead Transformation Programme Manager (Kingston and Richmond) NHS South West London CCG introduced the report.

There were some new metrics as a result of the new Better Care Fund (BCF) plan that was submitted in October 2021. There were some new metrics including length of stay in hospital and return to place of residence. These measures replaced the one for delayed transfers of care which ceased being reported nationally from 2020. There was a push nationally for longer planning timescales. Guidance was awaited as to what the 2022/23 measures would be. The BCF continued to facilitate health and care integration and linked in with other strategic pieces of work.

There were six metrics reported against and performance was reported against 2019/2020 to avoid the Covid year. There was a mixed picture amongst these metrics. Admission to residential and nursing care was above the year to date target. Nursing and care beds had been used to place patients out of hospital to relieve some of the pressure and there was demand from patients with complex needs due to the pandemic. The proportion of inpatients resident for 14 days or more and 21 days or more had also risen due to pandemic outbreaks in care homes at the end of 2021.

Discharge to normal place of residents was in line with figures in 2019/20. It should go on record that teams had worked tirelessly and effectively during the pandemic to place patients in in discharge in a safe manner.

In response to questions the following additional points were made:

- Due to Covid outbreaks in residential and care homes in November and December 2021 in Richmond and across the country, the ability to place residents safely in these settings was impeded. Previous outbreaks had not been as impactful.
- VCFS providers had worked equally hard with statutory services during the pandemic to provide services and had provided and continued to provide vital support.
- The metric on unplanned hospitalisation for chronic ambulatory care would capture sensitive conditions the work that was being done to support patients at home rather than an acute hospital. The work of relevant services had a positive impact on these patients. The anticipatory care model was also part of this, and the goal would be to implement this across all PCNs.
- It was hoped that the BCF's and H&CP would help address the socio-economic determinants of health outcomes.

RESOLVED that Heath & Wellbeing Board note and comment on the performance outlined in the report.

CHAIR

The meeting, which started at 1.36pm, ended at 2.45pm