



Elmbridge
Borough Council

... bridging the communities ...

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Sent via email

24 July 2023

Dear Joanne,

Publication Local Plan (Regulation 19) - June 2023

Thank you for consulting Elmbridge Borough Council (EBC) on your Publication Local Plan (Regulation 19) document. As a neighbouring authority, EBC is keen to continue working with the London Borough of Richmond upon Thames (LBRT) to ensure the delivery of our respective Local Plans.

In responding to this consultation, the Council has focused its response on the strategic policies that will, and / or are likely, to have cross-boundary implications for our borough and have been the subject of our on-going collaboration under the Duty to Cooperate. Our response also refers to the evidence base that has been prepared to inform and support these policies where appropriate.

Duty to Cooperate

Regarding the Duty to Cooperate, I can confirm that our authorities have engaged with one another to discuss cross-boundary strategic matters throughout the preparation of our respective (draft) Local Plans. This has included engagement on our evidence base documents, through officer meetings, and at our Regulation 18 and 19 stages.

It is noted that our Duty to Cooperate activities up until our respective Regulation 19 stages are recorded within EBC's Duty to Cooperate, Statement of Compliance (June 2022) and LBRT's Duty to Cooperate Statement Richmond Local Plan (Regulation 19) (June 2023).

EBC agrees that the above documents are an accurate record of engagement up until our respective Regulation 19 stages and raises no objections to LBRT's Publication Local Plan (Regulation 19) document on this ground.

Policy 1 – Living Locally and the 20-minute neighbourhood
Policy 2 – Spatial Strategy: Managing change in the borough

EBC's supports these policies that set out the overarching direction for how the LBRT is expected to evolve and how growth will be managed taking into account the Strategic Vision 2039 and the Strategic Objectives. Many of the Strategic Objectives reflect EBC's guiding principles as set out in its draft Local Plan (June 2022) including for example, its place-making led approach to managing growth and seeking to tackle the climate change emergency.

Policy 10 – New Housing (Strategic Policy)

EBC's notes that the target set for LBRT by the London Plan is 411 homes per annum (4,110 homes in the ten-year housing target) and that Policy 10 'New Housing', states that LBRT will seek to exceed this taking into consideration other Local Plan policies.

EBC welcomes this as well as the inclusion of indicative targets in the broad areas of the Borough. Nevertheless, linked to the Site Allocations, EBC's still considers that it would be useful if, within each of the allocations, the indicative number of units to be provided is set.

We note that an 'expected implementation timescale' for each allocation has been added since the Pre-Publication Regulation 18 Consultation (December 2021) which is considered to be a useful addition.

Meeting demand from outside of the Borough

As a neighbouring authority, you will be aware of the development needs of Elmbridge Borough and the constraints to development including, the consideration of Green Belt. LBRT will also be aware that EBC's draft Local Plan (June 2023) sets out that our local housing need figure, as set by the Government's standard methodology, will not be met in full.

Under the Duty to Cooperate, we request that LBRT continues to take into account Elmbridge's unmet housing need and informs EBC of any opportunities that arise within your Borough where our residual housing need, or part of it, could be met.

Place-based Strategy for Hampton & Hampton Hill
Site Allocation 2 – Platts Eyot

The boundary between Richmond and Elmbridge is separated by the River Thames and is an area sensitive to development given the swathe of open spaces, historic sites, important habitats for wildlife and generally lower densities of development.

Overall, EBC considers that these important features are recognised within the place-based strategy in terms of the Vision and Policies and that this has been carried through to the specific site allocations where relevant.

Of particular interest to EBC, given the site sits on our shared boundary, is Site Allocation 2 – Platts Eyot. It is noted that the area is proposed for regeneration for new business and industrial uses including residential development that should complement and enhance the island.

In our response to the Pre-Publication Regulation 18 Consultation, EBC raised the issue that the property areas around Platts Eyot are Flood Warning Areas as identified in EBC's Strategic Flood Risk Assessment Level 1 (2019). Therefore, caution should be given to any intensification which could otherwise increase flood risk and impact flow routes of the functional floodplain and we asked for capacity details, and timescales for delivery.

EBC therefore welcomes that any proposed scheme would need to ensure safe access to and egress from the island to the Environment Agency's satisfaction, noting the existing restricted access and flood constraints. A challenge, that may limit the amount of residential development appropriate on the site.

The inclusion of an expected implementation timetable is also welcome however, as previously raised and set out above, it would be useful for an indicative level of development both in terms of employment floorspace and number of homes to be given.

It is also noted that the allocation states that, "*The Council is committed to working in partnership with the site owners and Historic England to develop a Masterplan or development brief for the island.*" As requested at the Duty to Cooperate meeting on 10 July 2023, EBC would like to be engaged throughout the preparation of the Masterplan or Development Brief.

Policy 41 – Mooring and Floating Structures

This policy sets out the presumption against new proposals for houseboats, including extensions to existing houseboats, and other moorings or floating structures designed for permanent residential use.

In our response to the Regulation 18 Consultation, we stated that it was unclear how this policy was justified and welcomed seeing the evidence base that supports this draft policy.

Following our Regulation 18 response, it is noted that a Gypsy and Traveller Research report was updated in 2022 and that riverboat dwellers were considered as part of this. The conclusion being that there is no evidence to suggest that there is any need to introduce new provision for riverboard dwellers in the borough. It is also noted that no requests for moorings from the community and no reports of unauthorised moorings of riverboats have been made.

It also noted that the ongoing London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA) by RRR may help improve the understanding of mooring provision and identify additional need. EBC requests that it is kept informed of the progress of the London-wide GTANA.

Policy 47 – Sustainable travel choices

EBC's supports this policy which seeks to locate development closer to the public transport network, encouraging active travel and making accessibility easier in Richmond. This approach has many synergies to that taken in the Elmbridge draft Local Plan (June 2022).

EBC notes however, that the Strategic Transport Modelling was published in December 2017 as part of the London Plan evidence base. This document sets out the strategic modelling that was carried out to assess the effectiveness of the draft MTS scenario in accommodating new London Plan growth projections, with an increase in sustainable, active, and efficient travel.

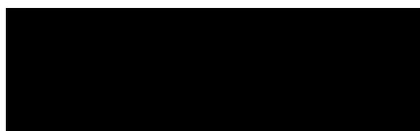
As discussed at the Duty to Cooperate meetings on 10 and 13 July 2023, EBC has concerns that a Transport Assessment has not been completed in support of the LBRT Publication Local Plan (Regulation 19) document which identifies whether there is any potential cross boundary or cumulative impacts on the road network outside of your borough. It is understood however, that a Topic Paper to address these concerns will be published and shared prior to the submission of your Local Plan. EBC welcomes further engagement on this issues.

On-going collaboration & Statement of Common Ground

As set out in our draft SoCG, EBC is committed to working positively together and welcomes our on-going collaboration as part of the preparation of our respective plans as we both head towards Submission and the Examination in Public stage.

Please do not hesitate to contact our Planning Policy & Strategy Manager, Suzanne Parkes on [REDACTED] or sparkes@elmbridge.gov.uk if any of the points raised requires further explanation. We would welcome the opportunity to discuss these comments in more detail.

Yours sincerely,



Councillor Robin Stephens
Portfolio Holder for Planning, Enterprise and Local Economy
Elmbridge Borough Council