

Duty to Co-operate Statement

Local Plan

May 2017

This document supersedes the January 2017 Duty to Co-operate Statement.

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1. Introduction

- 1.1 The Council is obliged to demonstrate how it has complied with the Duty to Co-operate as set out in Section 33A(1) of the Planning and Compulsory Act 2004 (introduced through the Localism Act 2011). This requires the Council to engage constructively, actively and on an ongoing basis with neighbouring authorities, and have regard to the activities of other prescribed bodies.
- 1.2 Para 156 of the NPPF sets out the strategic priorities that public bodies have a duty to co-operate on in the preparation of the Local Plan. These are:
- the homes and jobs needed in the area;
 - the provision of retail, leisure and other commercial development;
 - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - the provision of health, security, community and cultural infrastructure and other local facilities; and
 - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 1.3 The Council is bordered by four London Boroughs, namely Kingston, Hounslow, Wandsworth and Hammersmith & Fulham. In addition, the Borough of Richmond upon Thames shares its boundaries with Elmbridge and Spelthorne Borough Councils. The Council also works closely with the Mayor of London, the Greater London Authority and Transport for London. An excellent example of joint working with neighbouring boroughs was the development of the Joint West London Waste Plan, which was adopted in 2015.
- 1.4 Joint working also goes beyond preparing plans. Examples of this include the following:
- Richmond Council now has a Shared Staffing Arrangement in place with Wandsworth Council.
 - The Council also shares its responsibilities for education and children's services with Kingston Council, for which a Community Interest Company 'Achieving for Children' was set up.
 - Legal services are also shared with other boroughs; the South London Legal Partnership is a five borough shared legal service for the London boroughs of Richmond, Kingston, Merton, Sutton and Wandsworth.

- Richmond Council, together with Croydon, Kingston, Merton and Sutton, is part of the South London Partnership, which focuses on shaping sustainable growth across the region.
- Regular liaison with neighbouring boroughs also takes place on other key issues such as flood risk as part of wider groups, e.g. the Lower Thames Planning Officers Group.
- Richmond Council officers regularly attend meetings and actively contribute to the Association of London Borough Planning Officers, which provides a very useful platform for engaging with other London Boroughs on planning matters.
- There are also regular meetings with specific stakeholders and Duty to Co-operate bodies, for example, Council officers regularly meet with health bodies, including Public Health, Richmond Clinical Commissioning Group, NHS England, NHS Properties Services and the London Healthy Urban Development Unit, to discuss issues relating to the emerging Local Plan, the south-west London Sustainability & Transformation Plan, the Joint Strategic Needs Assessment etc.

1.5 Liaison has taken place with neighbouring authorities on the preparation of the revised Local Plan. This Duty to Co-operate 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 co-operate requirements as set out in the Localism Act 2011 and described in the NPPF have been fulfilled and that the Council has effectively co-operated with other bodies throughout the preparation of the Local Plan.

2. The borough and its interrelationship with Greater London and the South East

- 2.1 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 has to produce a spatial development strategy (SDS) – which has become known as ‘**the London Plan**’ – and to keep it under review. Boroughs’ Local Plan documents have to be ‘in general conformity’ with the London Plan, which is also legally part of the development plan that has to be taken into account when planning decisions are taken in any part of London unless there are planning reasons why it should not.
- 2.2 This means that planning for strategic matters and co-operation for London, generally takes place at the London-wide level, to inform the London Plan and is co-ordinated by the Greater London Authority (GLA).

- 2.3 The London Plan March 2016 (consolidated with alterations since 2011) sets the strategic framework for the whole of London and sets out objectives for strategic issues such as:
- the homes and jobs needed;
 - the location and provision of retail and employment development;
 - how growth will be supported and managed;
 - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, and energy (including heat);
 - the provision of social infrastructure and other local facilities; and
 - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 2.4 There is collaboration across the Wider South East to coordinate strategic policy and infrastructure investment more effectively. In October 2012 the Mayor of London published a discussion paper which explored options for future cross-boundary work on strategic planning for London and the Wider South East. As a result of these discussions, a working group of officers was established to explore strategic planning issues and examine the mechanisms for ongoing co-ordination and co-operation. This group came to be known as the Strategic Spatial Planning Officer Liaison Group (SSPOLG) and has focused mainly on housing, infrastructure and demography. The Group is also supporting Member level Roundtables and Summits. The Mayor has been engaging with authorities beyond London through his Duties to Inform and Consult on strategic planning matters during the preparation of the current London Plan and initial work on its full review. Details of the various meetings and papers are available at: www.london.gov.uk/about-us/organisations-we-work/policy-and-infrastructure-collaboration-across-wider-south-east
- 2.5 The **South London Partnership** (SLP) is a sub-regional collaboration of five London boroughs: Croydon, Kingston upon Thames, Merton, Richmond upon Thames and Sutton, which focuses on shaping sustainable growth. Through collaboration – between ourselves and with local public, private and voluntary and community sector partners – the South London Partnership is committed to accelerating and increasing the potential for economic growth in this area, beyond what we can achieve individually. This partnership enables effective engagement and cross-boundary working, including commissioning joint evidence base, influencing jointly the London Plan to ensure it benefits the south London region as well as programmes such as Crossrail 2 etc. More details are available at www.southlondonpartnership.co.uk
- 2.6 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. 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 **Lower Thames Planning Officers Group** is a group of relevant organisations within the area of the Lower Thames catchment including the Environment Agency, RB Kingston, Surrey County Council, Elmbridge, Spelthorne and other Councils along the Lower Thames. The aim of the group is to “achieve a cooperative, consistent and co-ordinated approach to flood risk from Thames side local planning authorities within the Group.” All flooding related planning issues are discussed, and the progress of each authority’s planning documents is discussed.

3. Overview of Local Plan Review

3.1 In line with national planning policies, the Local Plan should be kept up-to-date. The National Planning Policy Framework (NPPF) allows for Local Plans to be reviewed to respond flexibly to changing circumstances. Both the Core Strategy (CS) and Development Management Plan (DMP) were prepared prior to the NPPF. In addition other Government changes to planning policies and regulations have occurred since their adoption in 2009 and 2011 respectively, and the Council has taken forward a programme of Supplementary Planning Documents (SPDs) as part of its Village Planning. Consequently, the Council’s Cabinet, at its meeting on 2 July 2015, agreed that a review of the existing policies contained within the Core Strategy and Development Management Plan should be undertaken. In addition, it was agreed to take the site-specific allocations forward alongside the review of the policies.

3.2 The Local Plan was subject to three stages of public consultation:

Stage	Dates
Scoping Consultation	4 January 2016 – 1 February 2016
Pre-publication consultation (Regulation 18)	8 July 2016 – 19 August 2016
Publication consultation (Regulation 19)	4 January 2017 – 15 February 2017

3.3 There are separate Consultation Statements (Part II May 2017 and Part I January 2017) which set out full details of all the consultation undertaken at each stage.

3.4 To explain the context of the Local Plan review, rather than starting afresh, the Council produced for the Scoping consultation a [Detailed Review of Existing Policies \(December 2015\)](#). This included the detailed analysis and assessment of existing planning policies against national and regional guidance, local evidence and need, together with the rationale and scope for the review of the policies, including where there may be opportunities to consolidate some policies. This was specifically

to assist all respondents in identifying the main changes and issues for the Local Plan Review. An updated version of the [Policy Background Paper \(July 2016\)](#) was published to accompany the Pre-Publication consultation, and a further updated version of the [Policy Background Paper \(December 2016\)](#) was published to accompany the Publication consultation.

- 3.5 For the Local Plan, the Council has considered the relevance of each of the prescribed duty to co-operate bodies, linked to the nature of the Plan review, identifying some as less relevant to the Local Plan Review.

Prescribed bodies considered as relevant to this Local Plan Review:

- **RB Kingston upon Thames**
- **LB Hounslow**
- **LB Hammersmith and Fulham**
- **LB Wandsworth**
- **Elmbridge BC**
- **Spelthorne DC**
- **Mayor of London / GLA / Transport for London** (including LEP and Local Nature Partnership – note that the LNP no longer exists due to the cut in funding)
- **Environment Agency**
- **Historic England**
- **Natural England**
- **Richmond CCG / Richmond Public Health / NHS England / NHS Property Services / London Healthy Urban Development Unit (HUDU)**

Prescribed bodies not considered of relevance to this Local Plan Review:

- **Integrated Transport Authority** – the Council is the Highways Authority for the area; the Council's transport planners have been involved in the preparation of the Local Plan including site allocations.
- **Civil Aviation Authority** – the Council considered 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 the Council's planning policy documents, including the Local Plan; however, it was not thought to be necessary to hold specific duty to co-operate meetings or other engagement activities beyond the normal statutory consultation procedures with the CAA.
- **The Office of the Rail Regulation** – the Council considered that there were no strategic issues of relevance to discuss with the Office of the Rail Regulation, which is a statutory consultee and is consulted on all the Council's planning policy documents, including the Local Plan; however, it was not thought to be necessary to hold specific duty to co-

operate meetings or other engagement activities beyond the normal statutory consultation procedures with this Office.

- **Marine Management Organisation** – the Council considered that there were no strategic issues of relevance to discuss with the MMO. The MMO is preparing the South East Marine Plan and once adopted this will influence authorisation or enforcement decision-making.

In addition:

- **Highways England** (formerly the Highways Agency) – While the Council considers Highways England to be an important duty to co-operate body, due to the fact that this is a review and update of existing Local Plan documents, and due to the nature of the development sites in the borough, which have very limited impact upon the areas under the remit of Highways England, the Council has not approached them specifically in relation to the Duty to Co-operate. However, Highways England was consulted on all public consultations relating to the Local Plan.

4. Scoping Consultation: 4 January 2016 - 1 February 2016

- 4.1 Public consultation on the rationale and scope for the review of the existing policies, alongside the proposed sites to be allocated or designated for protection, took place from 4 January 2016 until 1 February 2016. This was an additional stage of consultation by the Council (not prescribed by the Local Planning Regulations 2012) to provide the opportunity for early engagement with interested parties and Duty to Co-operate bodies.
- 4.2 Specific engagement activities were undertaken at this stage with the Duty to Co-operate bodies considered of relevance to the Local Plan including neighbouring boroughs, the GLA and other statutory consultees. Meetings were held as follows:
 - Environment Agency: 2 February 2016
 - Historic England: 19 January 2016
 - NHS England and Richmond CCG: 26 January 2016
 - Greater London Authority and Transport for London: 18 January 2016
 - Elmbridge BC: 25 January 2016
 - LB Hammersmith and Fulham: 20 January 2016
 - LB Hounslow: 18 January 2016
 - RB Kingston: 20 January 2016
 - Spelthorne DC: 19 January 2016
 - LB Wandsworth: 15 January 2016

At this stage, Natural England confirmed that due to time and resource constraints matters would be dealt with through correspondence in writing.

- 4.3 Holding a series of Duty to Co-operate meetings at this early stage in the Local Plan review was useful to explain and discuss the Council's approach to the review of the policies, including any emerging changes to policy approaches and evidence, such as in relation to employment and housing. It provided an opportunity to update on any key sites that the Council was intending to allocate for development as part of the Local Plan, particularly for neighbouring authorities if they were close to the borough boundary. It was also an opportunity to discuss other authorities' Local Plan programmes. This led to the early identification of strategic and/or cross-boundary issues and priorities, and where relevant identified actions that needed to be taken. As a result the Duty to Co-operate discussions informed the development of the draft policies going forward in the Local Plan review.
- 4.4 A record of discussions at each meeting was provided by the Council and agreed with attendees, and the full details can be made available, however the Council has compiled a matrix which summarises discussions and issues identified, by each of the identified prescribed bodies and by each strategic issue, see section 7.
- 4.5 The Council received consultation responses to the Scoping consultation from the following Duty to Co-operate bodies: the Greater London Authority and Transport for London on behalf of the Mayor of London, Royal Borough of Kingston, Highways England, Natural England, Public Health, NHS England/NHS Property Services/Healthy Urban Development Unit and Richmond CCG, Environment Agency and Historic England.
- 4.6 All of the consultation responses received were published within the [Local Plan Review scoping consultation responses \(February 2016\)](#) and summarised in the [Local Plan Review scoping consultation responses and officers' comments \(June 2016\)](#) which also set out the Council's response to those comments raised.
- 4.7 In response the Council's drafting of policies and updates to the strategic vision and objectives and the spatial strategy were directly informed by the comments received. In many areas there was support from the prescribed duty to co-operate bodies for the scope and direction of the proposed Local Plan Review. There were some comments provided which directly informed policy drafting, including comments by Transport for London used in the new transport Policies LP44 and LP45, by the Environment Agency on green infrastructure and biodiversity and by Historic England on the historic environment and heritage assets policies. Some bodies raised particular issues to be addressed, such as Public Health raising the healthy weight agenda. Some bodies made the Council aware of other relevant and guidance. It also provided the basis

for further expert discussions, as an early draft of the design and heritage policies were shared with Historic England for comment in April 2016 who responded in May 2016 with initial comments.

5. Pre-publication consultation (Regulation 18): 8 July 2016 - 19 August 2016

- 5.1 The Council reviewed and updated the existing policies as well as the site specific proposals in line with the originally outlined rationale, scope and intention for review, also taking account of the consultation responses and outcomes from Duty to Co-operate and engagement activities. The Pre-Publication Local Plan, which was the Council's first draft of the revised Local Plan, was subject to public consultation from 8 July until 19 August 2016.
- 5.2 Early in the consultation period, on 26 July 2016, individual and bespoke emails on a one to one basis were sent to each of the prescribed bodies considered of relevance to the Local Plan. These built upon the scoping consultation meetings and where applicable subsequent responses, setting out the main issues that identified any strategic and/or cross-boundary issues previously discussed, any updates to the Council's evidence base, and what the Council was taking forward in the draft Local Plan. As the context remained a review of the Local Plan rather than starting afresh, the Council did not propose a specific Duty to Co-operate meeting or workshop during this consultation (other than a telephone interview in relation to the draft SHMA, see further details below), however the offer to meet was made. No meeting requests were received.
- 5.3 Alongside the Pre-Publication consultation, the [draft Strategic Housing Market Assessment \(SHMA\) \(June 2016\)](#) was published. As housing is a strategic issue, the Council's consultants, GL Hearn, were asked to contact all of the neighbouring authorities and the GLA, along with developers and Registered Providers, through structured telephone interviews during August/September 2016. This provided an opportunity to comment on the methodology and outcomes, and the discussions with the Duty to Co-operate bodies who responded (Elmbridge BC, LB Hammersmith and Fulham, and LB Wandsworth) have informed the final SHMA (December 2016).
- 5.4 The Council received consultation responses to the Pre-Publication consultation from the following Duty to Co-operate bodies: Historic England, Greater London Authority and Transport for London on behalf of the Mayor of London, Environment Agency, Richmond Clinical Commissioning Group, Natural England, London Borough of Wandsworth, Spelthorne Borough Council, Royal Borough of Kingston, and Highways England. Replies were also received from the London Boroughs of Hammersmith & Fulham and Hounslow, although these were not treated as formal responses as they did not raise specific comments on the Plan.

- 5.5 All of the consultation responses received were published within the All responses received to the [Local Plan Review Pre-Publication consultation and Sustainability Appraisal \(October 2016\)](#) and summarised in the [Summaries of responses received to the Pre-Publication Local Plan consultation and the Council's response \(December 2016\)](#) which also set out the Council's response to those comments raised.
- 5.6 In response the Council agreed a number of amendments to the Plan to address the suggestions set out by Duty to Co-operate bodies. This includes: amendments to Policy LP 21 Flood Risk and Sustainable Drainage suggested by the Environment Agency; amendments to Policy LP 3 Designated Heritage Assets and Policy LP 6 Royal Botanic Gardens, Kew World Heritage Site and other parts of the Plan concerning Local Character and Design and site specific proposals suggested by Historic England; amendments to Policy LP 12 Green Infrastructure and Policy LP 15 Biodiversity suggested by Natural England; amendments to incorporate zero carbon standards into Policy LP 22 Sustainable Design and Construction and vacant building credit into Policy LP 36 Affordable Housing to reflect the GLA comments; amendments to LP 44 Sustainable Travel Choices suggested by TfL; and amendments suggested by the Richmond Clinical Commissioning Group.
- 5.7 Some comments raised have also been considered in amendments to the Sustainability Appraisal.

6. Publication consultation (Regulation 19): 4 January 2017 – 15 February 2017

- 6.1 The Council reviewed and analysed all responses received during the pre-publication consultation and updated the Local Plan, including its policies as well as the site specific proposals, taking account of the consultation responses received, outcomes from Duty to Co-operate and engagement activities, and any other national government/regional changes. The Publication Local Plan, which is the Council's final draft of the Local Plan, was subject to public consultation from 4 January until 15 February 2017. It was also accompanied by the final [Sustainability Appraisal Report](#), which includes a section on the difference the SA process has made.
- 6.2 On 3 January 2017 individual and bespoke emails on a one to one basis were sent to each of the prescribed Duty to Co-operate bodies considered of relevance to the Local Plan. These built upon the last correspondence at Pre-Publication stage, setting out the main issues that identified any strategic and/or cross-boundary issues previously discussed, any updates to the Council's evidence base, and what the Council is taking forward in the final Publication Local Plan, where

appropriate highlighting the changes that had been made to the Pre-Publication Plan.

- 6.3 The Council received consultation responses to the Publication consultation from the following Duty to Co-operate bodies: Historic England, Greater London Authority and Transport for London on behalf of the Mayor of London, Environment Agency, Public Health – London Borough of Richmond, Natural England, Spelthorne Borough Council, Royal Borough of Kingston, and Highways England. A reply was also received from the London Borough of Wandsworth, although this was not treated as a formal response as this did not raise further matters on the Plan. A meeting was also held with the Royal Borough of Kingston on 8 February 2017 to exchange updates on plan progress.
- 6.4 All of the consultation responses received will be published and submitted to the Planning Inspectorate as part of the [submission](#) process of the Local Plan. The Council has updated the matrix to summarise the latest discussions and issues identified, by each of the identified prescribed bodies and by each strategic issue, see section 7.
- 6.5 The GLA's letter on behalf of the Mayor of London in relation to conformity dated 22 February 2017 is addressed in more detail elsewhere, including in the Statement of Consultation – Part II (including summary of main issues raised in Publication responses, schedules of Publication responses in plan order and Appendices) (May 2017) and Soundness Self-Assessment Checklist for Local Plan (May 2017).

7. Summary of Duty to Co-operate by Strategic Issues and Prescribed Bodies

- 7.1 The attached matrix sets out the summary of the Duty to Co-operate engagement and outcomes, by each of the strategic issues and by each of the prescribed bodies considered of relevance to the Local Plan.
- 7.2 The Council considers this demonstrates that positive engagement through the Duty to Co-operate has resulted in regular exchanges of information, particularly sharing evidence base and updates to policy approaches, and informed the preparation of the Local Plan.

Strategic Issues (in line with the NPPF)	Prescribed Duty to Co-operate Bodies – Neighbouring Authorities:					
	RB Kingston upon Thames ¹	LB Hounslow	LB Hammersmith and Fulham	LB Wandsworth ²	Elmbridge BC	Spelthorne BC
Method of engagement by the Council	<p>Meeting held at LBRuT Council offices on 20 January 2016.</p> <p>Bespoke email to Kingston on 26 July 2016.</p> <p>Bespoke email to Kingston prior to Publication – 3 January 2017.</p> <p>Meeting held at RBK offices on 8 February 2017.</p>	<p>Meeting held at LBRuT Council offices on 18 January 2016.</p> <p>Bespoke email to Hounslow on 26 July 2016.</p> <p>Bespoke email to Hounslow prior to Publication – 3 January 2017.</p>	<p>Meeting held at LBRuT Council offices on 20 January 2016.</p> <p>Bespoke email to Hammersmith & Fulham on 26 July 2016. Bespoke email to Hammersmith & Fulham prior to Publication – 3 January 2017.</p>	<p>Meeting held at Wandsworth Council offices on 15 January 2016.</p> <p>Bespoke email to Wandsworth on 26 July 2016.</p> <p>Bespoke email to Wandsworth prior to Publication – 3 January 2017.</p>	<p>Meeting held at LBRuT Council offices on 25 January 2016.</p> <p>Bespoke email to Elmbridge on 26 July 2016.</p> <p>Bespoke email to Elmbridge prior to Publication – 3 January 2017.</p>	<p>Meeting held at LBRuT Council offices on 19 January 2016.</p> <p>Bespoke email to Spelthorne on 26 July 2016.</p> <p>Bespoke email to Spelthorne prior to Publication – 3 January 2017.</p>
Housing market, including affordable housing, student housing	<p>This is a strategic issue for the RBK and LBR and it was agreed that we will liaise on our respective SHMAs.</p> <p>RBK have ambitious student housing targets. Discussion around whether that is to meet Kingston's own student housing need, or that of Roehampton and the wider London area.</p> <p>The Council provided input into RBK's SHMA through written comments to consultants Cobweb. The Council's draft SHMA was published and a telephone interview with GL Hearn was offered during August/September.</p> <p>RBK have concerns that if the unconstrained demographic need is not met, this may result in additional pressure on Kingston. It is noted that the Kingston and NE Surrey SHMA (June 2016) identifies the factors driving growth, stating in Kingston natural change is consistently high, together with net international migration, offset by an assumed increase in the rate of net out-migration to the</p>	<p>Common evidence base, i.e. London-wide SHLAA; LBH have an aspiration to go beyond their target of 822 homes pa to 1,350 homes pa, if the transport infrastructure is improved. Discussion of LBH Local Plan reviews and in particular the Great West Corridor Plan and the West of Borough plan issues consultation. There are a number of strategic sites, particularly those close to or adjacent to authorities' boundaries e.g. Chiswick and Kew Gardens. Recognise as a strategic issue.</p> <p>There has been liaison on the boroughs SHMAs. The Council participated in LBH's telephone interview with consultants Cobweb. The Council's draft SHMA was published and a telephone interview with GL Hearn was offered during August/September.</p>	<p>Recognised that this is a strategic issue. Continued liaison as Richmond's borough SHMA is progressed alongside the Local Plan review.</p> <p>Discussed affordable housing policy and how policies may need to be reviewed in light of Starter Homes. Noted that H&F has produced a Buy to Leave SPD.</p>	<p>There is a common approach to evidence base, underneath London Plan. It is noted that Wandsworth's housing target is significantly higher than Richmond's. It has been agreed that there will be continued liaison as Richmond's borough SHMA is progressed alongside the Local Plan review.</p> <p>The Council's draft SHMA was published and LBW took part in a telephone interview with GL Hearn during August/September.</p>	<p>Elmbridge is concerned that if outer London boroughs fail to meet their targets or that these are set very low, Elmbridge will face increasing pressure to compensate the housing not delivered in the outer London boroughs.</p> <p>Recognise that the Housing market is the key strategic and cross boundary issue.</p> <p>Elmbridge have undertaken a SHMA with Kingston and NE Surrey Districts. Continued liaison took place as SHMAs progressed. Expectation for boroughs that it would be difficult to meet objectively assessed need.</p> <p>The Council provided input into Elmbridge's/RBK's SHMA through written comments to consultants Cobweb. Richmond Council's draft SHMA was published and EBC took part in a telephone interview with GL Hearn during August/September.</p> <p>It is noted that the Kingston and NE Surrey SHMA (June 2016) identifies the factors driving growth, stating in Elmbridge a steady net loss through</p>	<p>Recognise is a strategic, cross-boundary issue. Continued liaison as Richmond's borough SHMA progressed. The Council was consulted in 2015 on the draft SHMA for Runnymede and Spelthorne. Richmond Council's draft SHMA was published and a telephone interview with GL Hearn was offered during August/September.</p> <p>SBC have concerns that failure to meet need as set out in the SHMA has implications for adjoining authorities, however the Council has not requested for Spelthorne to take part of this need, and across the London Plan area additional capacity is being identified to meet the strategic need for housing across London, and the GLA is working with authorities in the Wider South East. SBC wish to be assured that all options have been thoroughly explored with regards to meeting as much of the objectively assessed housing need as possible.</p> <p>SBC have brought to the attention of Richmond Council that the consultant representing the</p>

¹ Note that the London Borough of Richmond upon Thames and the Royal Borough of Kingston upon Thames, together with the Boroughs of Croydon, Merton and Sutton, form the South London Partnership. These boroughs are working together on key issues such as achieving sustainable and good growth, with the right balance between housing and economic growth.

² Note that since 1 October 2016, a Shared Staffing Arrangement is in place between the London Boroughs of Richmond upon Thames and Wandsworth. Therefore, there is one Planning Policy & Design Team covering both boroughs.

Strategic Issues (in line with the NPPF)	Prescribed Duty to Co-operate Bodies – Neighbouring Authorities:					
	RB Kingston upon Thames ¹	LB Hounslow	LB Hammersmith and Fulham	LB Wandsworth ²	Elmbridge BC	Spelthorne BC
	rest of the country. RBK confirmed that they are currently in no position to assist neighbouring boroughs with their housing shortfall.				international migration is projected, although more than offset by natural growth and internal in-migration. The Council has not requested for Elmbridge to take part of the borough's need, and across the London Plan area additional capacity is being identified to meet the strategic need for housing across London, and the GLA is working with authorities in the Wider South East.	developer behind Kempton Park is preparing background research and expecting to submit as a proposed site through the Local Plan route.
Gypsies & Travellers	No cross-boundary issues identified. Each borough has one Traveller site.	Noted recent changes to Government approach, including definition of travellers. Keep research under review, not currently aware of any cross boundary issues.	No cross-boundary issues identified.	No strategic issues or cross-boundary issues were identified that need to be addressed.	Noted recent changes to Government approach, including definition of travellers, but not identified as a cross boundary issue.	Not identified as a cross-boundary issue, but keep research under review.
Employment / Employment land supply	Both boroughs are aiming to protect employment space and both have Article 4s in place. RBK welcome the protection of offices around Hampton Wick, close to the borough boundary, by an Article 4 Direction.	Shared issues over PD rights and loss of employment floorspace, although not identified as a strategic issue.	Discussion around protecting employment land in both boroughs but not identified as a strategic or cross-boundary issue for the two boroughs.	Wandsworth support the work Richmond are undertaking on employment sites. It has been noted by both boroughs that pressure on employment sites will not change. Affordable business space was also discussed, and it was noted that both boroughs support the provision of affordable work space. Initially there were no strategic issues or cross-boundary issues identified that need to be addressed. It is noted that Wandsworth is now pursuing a Local Plan: employment and industry review and it is identified that policies are taking a similar approach due to the shared concerns about the loss of employment land and the impact of PD rights. Wandsworth support Richmond's strong approach to prevent further loss of business and industrial floorspace, complemented by Article 4 Directions.	Neither borough has concluded that employment land is a strategic issue.	Common concerns not to lose employment floorspace, although not a strategic issue.
Town centres and shopping	This is identified as a cross-boundary issue. Kingston Town Centre wants to maintain its Metropolitan status, its competitiveness and its	No cross boundary issues.	Noted that Hammersmith (close to Barnes) is a major town centre in the London Plan town centre hierarchy but no strategic issues were identified.	Richmond outlined that no changes are proposed as part of the Local Plan review to the role or hierarchy of town centres. It was noted that Wandsworth	Both boroughs are impacted by the strength of retail in Kingston Town Centre, but no strategic or cross boundary issues that need to be addressed.	No cross boundary issues.

Strategic Issues (in line with the NPPF)	Prescribed Duty to Co-operate Bodies – Neighbouring Authorities:					
	RB Kingston upon Thames ¹	LB Hounslow	LB Hammersmith and Fulham	LB Wandsworth ²	Elmbridge BC	Spelthorne BC
	designation as an Opportunity Area. LBR noted that this is likely to draw shoppers away from Richmond town centre. We emphasised the importance of ensuring the balance is maintained and that there is not a dramatic shift of shoppers away from Richmond to Kingston as this could impact negatively on Richmond's town centres. Agreed that LBR will monitor the situation and will raise any concerns as part of future duty to co-operate engagement.		H&F outlined their new Retail Needs study which includes the evidence base for the planned 30,000sqm of retail floorspace at Earl's Court; this is considered out-of-centre retail and raises potential policy issues.	undertook a Joint-Retail Needs study with Lambeth. No strategic issues or cross-boundary issues were identified that need to be addressed.		
Transport infrastructure	This is a cross-boundary issue but no specific points of discussion were identified. Noted that RBK are promoting cycling across the borough after a successful mini-Holland bid. Further work on Crossrail 2 through continued engagement with TfL and neighbouring boroughs. Also joint work as part of the South London Partnership on transport projects, including Crossrail 2.	Noted the possible provision of strategic transport improvements, including 2 new rail links. These are key to the delivery of development in Brentford /Kew gate area and would affect both authorities as on the Brentford side of Kew Bridge. However no current cross-boundary issues that need to be addressed, with ongoing liaison with TfL and neighbouring boroughs.	Discussed various proposals / plans which have cross-boundary implications including Crossrail 2 (potentially stations in LBR) and improvements to Hammersmith Bridge to enable double-decker buses to drive over it. Further work to continue on Crossrail 2 through engagement with TfL and neighbouring boroughs.	It was discussed that Richmond is not looking at allocating any specific transport proposal sites. Crossrail 2 and likely implications were discussed. It was noted that previous discussion took place to improve links between Roehampton and Barnes Station which remains relevant. No strategic issues or cross-boundary issues were identified that need to be addressed. Further work to continue on Crossrail 2 through engagement with TfL and neighbouring boroughs.	The route from Hampton Court down to the A3 can become very congested especially at Hampton Court Bridge between the two boroughs. Crossrail 2 has been discussed. Elmbridge concern TfL is applying London Plan based policy assumptions to assessing new capacity around stations. Both agreed the details on supporting infrastructure, level crossings, etc. and housing densities, will need to be assessed. Further work to continue on Crossrail 2 through engagement with TfL and neighbouring boroughs. Not a cross boundary issue that needs to be addressed, mechanisms for liaison between highway authorities.	Not a strategic or cross boundary issue. Discussed Crossrail 2 proposals – will be going to stations in LBR and into Spelthorne. Further work to continue on Crossrail 2 through engagement with TfL and neighbouring boroughs.
Water supply and wastewater management	Not identified as a strategic or cross-boundary issue.	London Infrastructure Plan deals with strategic approach. No identification of strategic or cross-boundary issues.	Thames Tunnel is an ongoing strategic issue but it is not one of relevance to the Richmond Local Plan review.	No strategic issues or cross-boundary issues were identified that need to be addressed.	No identification of strategic or cross-boundary issues	Discussed Hampton Waterworks. No changes as part of Local Plan to the Green Belt boundaries or to the site. No strategic or cross boundary issues.
Climate change adaptation, particularly flood risk	This is a strategic issue: RBK and LBR working together on the Thames Landscape Strategy and as part of the South West London Strategic Flood Group and Lower Thames Planning Officers' Group, which meets regularly with other Councils and District authorities in the upper reaches of the Thames, including Surrey County Council.	No strategic issues or cross-boundary issues were identified that need to be addressed.	Not identified as a strategic or cross-boundary issue.	Richmond's basement policy including the possibility of restricting basements in significant / very high flood hazard areas has been discussed along with the SFRA update. No strategic issues or cross-boundary issues were identified that need to be addressed. LBR and LBW are also working together as part of the South	Recognise strategic, cross-boundary issue, with existing joint working e.g. Lower Thames Planning Officers Group. Updates on SFRAs and other related guidance have been shared.	Recognise strategic, cross-boundary issue, with existing joint working e.g. Lower Thames Planning Officers Group.

Strategic Issues (in line with the NPPF)	Prescribed Duty to Co-operate Bodies – Neighbouring Authorities:					
	RB Kingston upon Thames ¹	LB Hounslow	LB Hammersmith and Fulham	LB Wandsworth ²	Elmbridge BC	Spelthorne BC
				West London Strategic Flood Group.		
Climate change mitigation	Not identified as a strategic or cross-boundary issue.	Not identified as a strategic or cross-boundary issue.	Not identified as a strategic or cross-boundary issue.	It was noted that policies follow the London Plan approach. No strategic issues or cross-boundary issues were identified that need to be addressed.	Richmond adopted a revised sustainable construction checklist SPD in 2015. In light of Government changes Elmbridge dropped their sustainable construction requirements. No strategic or cross-boundary issues.	Proposing to maintain policy approaches, albeit with the adoption of zero carbon standards for major residential developments from October 2016, and major non-residential developments from 2019 onwards. No strategic or cross-boundary issues.
Energy infrastructure	Not identified as a strategic or cross-boundary issue	No strategic issues.	Not identified as a strategic or cross-boundary issue.	No strategic issues or cross-boundary issues were identified that need to be addressed.	Energy infrastructure does not present a strategic or common issue.	Energy infrastructure does not present a strategic or common issue.
Health care	Not identified as a strategic or cross-boundary issue	Noted that demand is increasing and will increase further with the provision of many more homes, however not a strategic cross boundary issue.	Not identified as a strategic or cross-boundary issue. Discussed LBR's potential takeaways policy to restrict A5 uses near schools; noted that H&F already have a policy and SPD in this regard. A restrictive policy on takeaways in proximity to schools has now been incorporated into the Plan.	Richmond noted Wandsworth approach on restricting takeaways near schools. A restrictive policy on takeaways in proximity to schools has now been incorporated in to the Plan. No strategic issues or cross-boundary issues were identified that need to be addressed.	No strategic or cross-boundary issues were identified.	Health infrastructure does not present a strategic or common issue.
Schools & education	RBK and LBR are working together on education matters under Achieving for Children (AfC) – the Councils' joint Children's Services department.	Schools are a particular issue for LBH and finding suitable sites for Free Schools especially is an increasing problem. Some shared catchments in the Whitton/Hounslow area, however this is not a strategic issue.	Not identified as a strategic or cross-boundary issue.	No strategic issues or cross-boundary issues were identified that need to be addressed.	Catchments do not appear to be shared across the boundary; therefore, not identified as a strategic or cross-boundary issue.	Richmond local needs increased, but no identification of strategic or cross-boundary issues as catchments do not appear to be shared across the boundary
Community and cultural infrastructure	Not identified as a strategic or cross-boundary issue	Not identified as a strategic or cross-boundary issue.	Not identified as a strategic or cross-boundary issue.	No strategic issues or cross-boundary issues were identified that need to be addressed.	Not identified as a strategic or cross-boundary issue.	Not identified as a strategic or cross-boundary issue.
Historic environment	Tall buildings in RBK, especially Kingston Town Centre and alongside the riverside are likely to be of concern for LBR. Noted that RBK is producing a Riverside and Public Realm SPD which will consider tall buildings and identify key views that should be protected, e.g. Kingston Bridge to Richmond Hill. LBR continue to be consulted on this work and will monitor proposals.	Tall buildings on sites adjacent or near to the Borough boundary that could affect designated heritage assets and their settings has been identified as a strategic cross boundary issue. There is on-going liaison through consultations on policy documents and discussions regarding redevelopment proposals and their impact particularly on the Royal Botanic Gardens at Kew, World Heritage Site.	Potential cross-boundary issues in relation to tall buildings in H&F and their impact on settings and views in LBR. However, it was noted that both boroughs have strong policies on the design of the built environment and both have active community groups concerned with the historic environment. Discussed the need to liaise over site specific proposals.	No strategic issues or cross-boundary issues were identified that need to be addressed.	No strategic issues or cross boundary issues were identified. Discussed details around local sites close to the boundary such as the Jolly Boatman and Hampton Court Palace.	No strategic or cross boundary issues. Noted Hampton and Kempton Waterworks Railway usually promote reinstatement of former light railway, although the Council has not considered that this is a matter for the Local Plan, Noted - Platts Eyot: loss of deep water boat repair facilities would affect boat users upstream.
Natural environment	Boroughs agreed to continue to work together with regards to the Thames and parks.	LBH Green Belt review has been noted. Both boroughs have a similar approach on rivers and open spaces. No strategic issues that need to be	Not identified as a strategic or cross-boundary issue.	No strategic issues or cross-boundary issues were identified that need to be addressed.	Discussed the importance of the River Thames and the protection of designated open spaces and land for biodiversity value. No strategic or cross boundary	Proposing to maintain policy approaches to open spaces, River Thames, biodiversity etc. No identification of strategic or cross-boundary issues.

Strategic Issues (in line with the NPPF)	Prescribed Duty to Co-operate Bodies – Neighbouring Authorities:					
	RB Kingston upon Thames ¹	LB Hounslow	LB Hammersmith and Fulham	LB Wandsworth ²	Elmbridge BC	Spelthorne BC
		addressed. Discussed the importance of the River Thames and the protection of designated open spaces and land for biodiversity value.			issues to address.	
Telecommunications infrastructure	Not identified as a strategic or cross-boundary issue	Not a strategic or common issue.	Not identified as a strategic or cross-boundary issue.	No strategic issues or cross-boundary issues were identified that need to be addressed.	Not a strategic or common issue.	Not a strategic or common issue.

Strategic Issues (in line with the NPPF)	Other prescribed Duty to Co-operate bodies:				
	Mayor of London / GLA / Transport for London (including LEP and Local Nature Partnership)	Environment Agency	Historic England	Natural England	Richmond CCG / NHS England ³
Method of engagement by the Council	<p>Meeting held at GLA's offices with GLA and TfL on 18 January 2016.</p> <p>Bespoke email to Mayor of London (GLA and TfL) on 26 July 2016.</p> <p>Bespoke email to Mayor of London (GLA and TfL) prior to Publication – 3 January 2017.</p>	<p>Meeting held on 2 February 2016 at LBRuT Council Offices.</p> <p>Bespoke email to EA on 26 July 2016.</p> <p>Bespoke email to EA prior to Publication – 3 January 2017.</p>	<p>Meeting held at LBRuT Council offices on 19 January 2016.</p> <p>Bespoke email to HE on 29 April 2016.</p> <p>Bespoke email to HE on 26 July 2016.</p> <p>Bespoke email to HE prior to Publication – 3 January 2017.</p>	<p>Natural England confirmed on 12 January 2016 that they would respond in writing; no specific DTC meeting was held.</p> <p>Bespoke email to NE on 26 July 2016.</p> <p>Bespoke email to NE prior to Publication – 3 January 2017.</p>	<p>Meeting held at LBRuT Council offices on 26 January 2016 – this included the following health bodies:</p> <ul style="list-style-type: none"> Richmond Clinical Commissioning Group (CCG) Richmond Public Health NHS England NHS Property Services London Healthy Urban Development Unit (HUDU) <p>Bespoke email to health bodies on 26 July 2016.</p> <p>Bespoke email to health bodies prior to Publication – 3 January 2017.</p>
Housing market, including affordable housing	<p>The borough-wide SHMA was initially discussed; Richmond acknowledged that the SHMA will come up with a need number much higher than can be accommodated given capacity constraints. It was noted that whilst consideration should be given to MOL/Green Belt, the GLA would not push or require boroughs to undertake a review.</p> <p>Areas for intensification, particularly town centres and densities were discussed.</p> <p>LBR continues to have a 5-year housing land supply.</p> <p>Discussed extra-care and Richmond's high London Plan target for older people (almost half of the borough's housing target which is a concern for Richmond) and notified the GLA of the Council's local research.</p> <p>It was agreed that housing is a strategic issue that Richmond will continue to liaise on with the GLA. The Council's draft SHMA was published and a telephone interview with GL Hearn was offered during August/September.</p> <p>GLA pleased to see the borough will be exceeding its target for the next five to ten years and urges borough to continue to seek ways in which to supplement additional housing capacity. Support for approach to affordable housing provision.</p> <p>Some concerns raised in relation to requirement for older people's accommodation in the Plan, for which benchmarks provided are lower than those in the London Plan. However, the Council feels that Policy LP 37 Housing Needs of Different Groups of the Local Plan sufficiently addresses this.</p>	<p>Previously had discussed the draft proposal sites as part of draft Site Allocations Plan consultation. Particular focus on sites that are located in areas at high probability of flooding, such as Stag Brewery, Platts Eyot, Kew Biothane, RFU and others. Initially discussed the need to update the flood risk Sequential Test report to accompany the draft Plan as a technical study / background paper which has been published at each consultation stage.</p> <p>EA welcomes importance placed on protecting and enhancing Richmond's unique environmental quality and maximising opportunities to continually improve the environment for people and wildlife.</p>	<p>Richmond's approach and SHMA was discussed. The need to consider balancing housing needs against the constraints of this borough, particularly the heritage constraints, was highlighted.</p>	<p>Recognise the recreational pressure on existing green infrastructure and that new residential development is likely to exacerbate this pressure, hence policy should require all new developments to mitigate this potential impact.</p>	<p>LB Richmond's housing target of around 315 net additional units per annum was discussed.</p> <p>It was noted that the borough's social infrastructure is at capacity and with population growth it is very important that sufficient land is secured for required social infrastructure uses, such as health facilities and children's nurseries, to support the growth and development in the borough.</p>
Gypsies & Travellers	<p>Whilst not a strategic issue of relevance to the GLA, the GLA have been notified of the publication of the Council's research.</p>	<p>Not discussed; not a strategic issue or of relevance for the Environment Agency.</p>	<p>This is not a strategic issue or of relevance for Historic England.</p>	<p>N/A</p>	<p>N/A</p>

³ Regular meetings take place between LBR and Public Health, NHS England and NHS Property Services, in relation to their premises and wider plans and strategies for the area, including the Richmond CCG Estates Strategy.

Strategic Issues (in line with the NPPF)	Other prescribed Duty to Co-operate bodies:				
	Mayor of London / GLA / Transport for London (including LEP and Local Nature Partnership)	Environment Agency	Historic England	Natural England	Richmond CCG / NHS England ³
Employment / Employment land supply	GLA's research on industrial land (supply and demand) was discussed, as well as Article 4 Directions and the policy approach to distinguish between different types of employment uses in policy, and review marketing requirements and criteria. It was noted that the categorisation of this borough as 'restrictive transfer' will be a matter for the London Plan full review, but it is unlikely that this would change. In principle the GLA support a Borough approach to distinguishing between different types of employment uses (e.g. B1, B2, B8).	LBRuT explained aims and objectives for protecting employment land especially following change in PD rights; not a strategic issue or of relevance for the Environment Agency.	Whilst this is generally not a strategic issue or of relevance for Historic England, the relationship between employment land uses and restoring historic buildings was discussed for example in relation to Platts Eyot.	N/A	N/A
Town centres and shopping	No changes were proposed to the role or hierarchy of town centres; there is also no review of town centre boundaries and areas of mixed use as part of this Local Plan. The GLA expect Richmond to look at higher densities; in this context, issue of taller buildings has been discussed and that the borough has lots of Conservation Areas and other constraints. The GLA approach seeks 'suburban intensification'. Town centres and densities are considered to be a strategic issue and Richmond continues to liaise with the GLA on this to achieve an appropriate balance. The GLA/Mayor of London have not raised any issues in this regard in the response to the Publication Local Plan.	Not discussed; not a strategic issue or of relevance for the Environment Agency.	Historic England highlighted concerns regarding the London Plan approach for densification of town centres as this is not necessarily an approach that is appropriate for all town centres. It was discussed that opportunities for higher density development in the borough's town centres will be limited due to heritage constraints and the relationship with established residential areas. It was agreed that town centres and intensification is a strategic issue that LBR continues to liaise on with HE. Policies support appropriate conversion of upper floors and the rear of units.	N/A	N/A
Transport infrastructure	Richmond has not allocated any specific transport proposal sites as part of this Local Plan, and longer-term infrastructure projects are contained within the updated Infrastructure Delivery Plan (2017). Further joint working with the GLA and TfL will be carried out as part of the new London Plan and with regard to Crossrail 2. Crossrail 2 implications will need to be considered as part of the next review of the Local Plan. Car parking standards have been discussed, including the flexibility for boroughs, and the Council kept TfL informed of Richmond's research undertaken to inform the parking policy and standards. Concerns have been raised by TfL to the Publication Local Plan's parking standards policy and the GLA has raised a non-conformity issue in this regard. Whilst the Council does not consider this to be a 'strategic' issue, this will be discussed further as part of the Examination into the Plan. Transport is a strategic issue that will require continued liaison with both TfL as well as the GLA.	Not discussed; not a strategic issue or of relevance for the Environment Agency.	Discussed implications of Crossrail 2. HE mentioned that much of the justification is related to the additional housing and jobs Crossrail 2 will generate. It was agreed that the Council will liaise further with TfL and neighbouring boroughs to understand growth implications.	N/A	N/A
Water supply and wastewater management	This is not a strategic issue or of relevance for GLA/TfL.	LBRuT informed the EA that water supply and wastewater management is being dealt with by LBRuT and Thames Water. In general the EA welcomes the Local Plan's approach to improving water quality in line with the Water Framework Directive.	This is not a strategic issue or of relevance for Historic England.	N/A	N/A

Strategic Issues (in line with the NPPF)	Other prescribed Duty to Co-operate bodies:				
	Mayor of London / GLA / Transport for London (including LEP and Local Nature Partnership)	Environment Agency	Historic England	Natural England	Richmond CCG / NHS England ³
Climate change adaptation, particularly flood risk	The Green Infrastructure policy and sustainable development discussed. This is not a strategic issue or of relevance for GLA/TfL. General support for policy on basements and subterranean developments, including for reference to restricted uses including self-contained units and bedrooms at basement level.	LBRuT and EA have a very good and effective working relationship on flood risk matters. It has been agreed that strategic priorities for the EA and the borough are the Lower Thames Strategy, Thames Estuary 2100 Plan and Water Framework Directive. EA seek cross referral to these included in the Plan policies. EA suggest “making space for water” in the Local Plan. LBRuT has consulted the EA on updates to the Council’s SFRA. General support for policy approach to climate change adaptation and flood risk.	It was discussed that in areas of the borough affected by fluvial flooding, property-level protection is being encouraged and this may have implications for historic properties. This is not a strategic issue or of relevance for Historic England.	N/A	N/A
Climate change mitigation	Overall, this is not a strategic issue or of relevance for GLA/TfL. General support for working towards zero carbon and policies reflecting the London Plan. The reference to achieving zero carbon standards in line with the London Plan for all major residential developments is welcomed.	Discussed the maintenance of the existing policy approaches and EA continuing to provide input, general support for policy approach to climate change mitigation.	This is not a strategic issue or of relevance for Historic England. It was noted that HE has advice on retrofitting.	N/A	N/A
Energy infrastructure	This is not a strategic issue or of relevance for GLA/TfL.	Not discussed; not a strategic issue or of relevance for the Environment Agency.	This is not a strategic issue or of relevance for Historic England.	N/A	N/A
Health care	Research on social infrastructure was discussed, working with NHS England and Richmond Clinical Commissioning Group as well as Achieving for Children/Education department (re schools and nurseries) to reflect latest needs.	Not discussed; not a strategic issue or of relevance for the Environment Agency.	This is not a strategic issue or of relevance for Historic England, although it was discussed that where there is disposal of sites (e.g. Barnes Hospital, St Michael’s Convent), LBR and HE will be keen to ensure heritage / historic / listed features are retained and references to designated heritage assets have been added to the site allocation proposals.	N/A	It was agreed that health is a strategic issue. The approaches to takeaways in proximity to schools as well as requirements for HIA’s were discussed and the health bodies’ support on these aspects was noted. The other strategic issues were not discussed in detail but it was acknowledged that various policy areas are relevant to the health and wellbeing of the population. Public Health mentioned that ‘dementia-friendly environments’ could be promoted as part of the Local Plan. A need for pharmacy services and potential health service provision at Barnes Hospital are recognised in the Plan, along with reference to the NHS South West London Sustainability and Transformation Plan. Public Health satisfied with overall approach in recognising the significant impact the built

Strategic Issues (in line with the NPPF)	Other prescribed Duty to Co-operate bodies:				
	Mayor of London / GLA / Transport for London (including LEP and Local Nature Partnership)	Environment Agency	Historic England	Natural England	Richmond CCG / NHS England ³
					environment has on people's wellbeing and the potential opportunities presented by the Plan to better influence positive outcomes in the planning process.
Schools & education	It was noted that the GLA published "Projected demand for school places" report (December 2015) on schools with figures down to borough level. General support for maximising potential of existing educational sites, although not a strategic issue for GLA/TfL. Also note comments below under 'Natural environment' in relation to an existing higher education site, i.e. St Mary's University.	Not discussed; not a strategic issue or of relevance for the Environment Agency.	This is not a strategic issue or of relevance for Historic England.	N/A	N/A
Community and cultural infrastructure	This is not a strategic issue or of relevance for GLA/TfL.	Not discussed; not a strategic issue or of relevance for the Environment Agency.	This is not a strategic issue or of relevance for Historic England.	N/A	N/A
Historic environment	This is not a strategic issue or of relevance for GLA/TfL.	Not discussed; not a strategic issue or of relevance for the Environment Agency.	With the pressure for increased densities and intensification, it was highlighted by HE that policies need to ensure that the historic assets, their settings and the natural environment continue to be protected. This is a strategic issue that requires further liaison with HE. Advised on detailed wording of policies related to Local Character and Design. HE welcomes clear commitment to conserving and enhancing LBR's exceptional historic environment. Some minor comments have been raised by HE at the Publication stage, which are mainly to ensure clarity and alignment with the approach in the NPPF; these can be discussed/considered as minor changes to the Plan.	N/A	N/A
Natural environment	It was agreed that this is not a strategic issue or of relevance for GLA/TfL. GLA strong emphasis from the Mayor on protecting MOL and Green Belt. Concerns were raised by the GLA to the Publication Local Plan on the Site Allocation at St Mary's University regarding inappropriate development in the MOL. Whilst the Council does not consider this to be a 'strategic' issue, the GLA has raised a non-conformity issue in this regard and this will be discussed further as part of the Examination into the Plan.	LBRuT discussed maintaining policy approaches to open spaces, to the River Thames and to biodiversity value. General support for policy approaches to green infrastructure, river corridors as a key element of the green infrastructure network and biodiversity.	Discussed that River Thames is important features that relates to heritage and history in terms of major historic assets, historic landscape, historic parks and gardens etc. It is a strategic issue that requires further liaison with HE. Advised on detailed wording of policies related to green infrastructure.	The natural environment and green infrastructure are of strategic importance. NE support policies to protect and/or enhance the natural environment for present and future generations. Advised on international, national and local designations, and Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA) of the Plan. NE advised on detailed wording and satisfied with approach in Plan.	N/A
Telecommunications	This is not a strategic issue or of relevance for GLA/TfL.	Not discussed; not a strategic	This is not a strategic issue or of	N/A	N/A

Strategic Issues (in line with the NPPF)	Other prescribed Duty to Co-operate bodies:				
	Mayor of London / GLA / Transport for London (including LEP and Local Nature Partnership)	Environment Agency	Historic England	Natural England	Richmond CCG / NHS England ³
infrastructure		issue or of relevance for the Environment Agency.	relevance for Historic England.		

Matrix last updated: May 2017