

Duty to Cooperate Statement Richmond Local Plan (Regulation 19)

Planning

9 June 2023

Public Consultation to 24 July 2023



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1. Introduction

- 1.1. This statement sets out the processes and actions that have been undertaken to date 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.
- 1.2. This statement is subject to review and will be updated to demonstrate that the Duty has been met and that the Council has engaged constructively, actively and on an ongoing basis during the preparation of the Plan as it progresses to its submission.

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 National Planning Policy Framework (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 2021 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”.

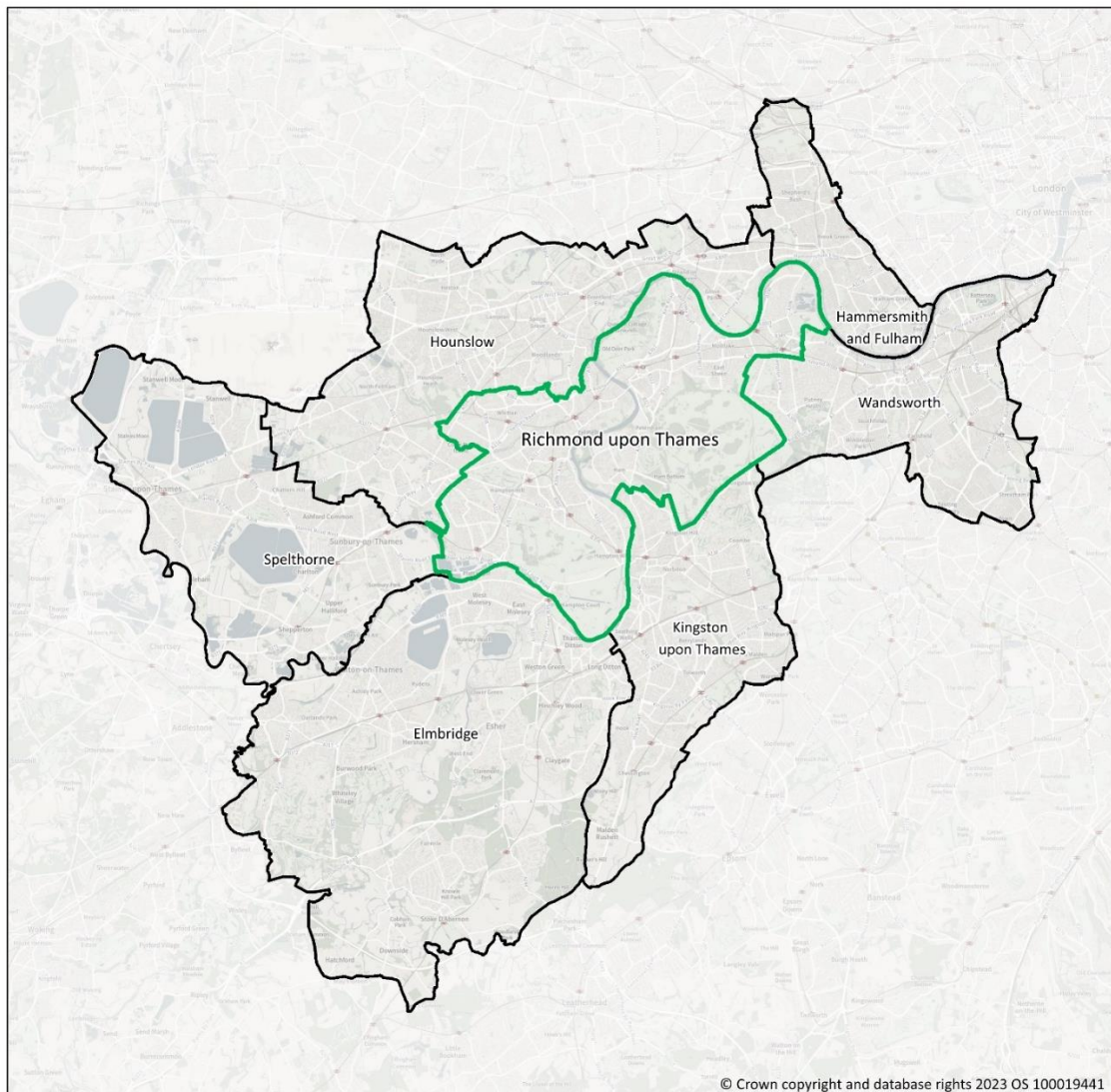
- 2.10. As outlined in Paragraph 20 of the NPPF, local planning authorities should prepare strategic policies that set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

- 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 DfC 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



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: Examination in Public – underway, focused hearings November 2021. Focused Issues Review (FIR) (Volume 1): Regulation 18 consultation October to November 2022. <i>In a letter to the Planning Inspectorate dated 26 April 2023, Hounslow outlined its intention to withdraw Volumes 2 to 4 of the Local Plan Review from examination and to progress Volumes 1 to 4 together for examination as a cohesive Local Plan.</i>
London Borough of Wandsworth	Examination in Public – November 2022 Consultation on Main Modifications and Policies Map Changes from February to March 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	Regulation 19 consultation June to July 2022. Preparing for submission summer 2023.
Spelthorne Borough Council	Examination in Public – underway, hearings May to June 2023.

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 \(LoDEG\)](#). For example, 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 duty to cooperate 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)	June - 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 (June 2023) which sets out full details of all the consultation undertaken prior to the Publication consultation, all the consultation responses received and the Council's response to the comments, available alongside the [Publication consultation](#).

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 duty to cooperate 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 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 is starting in June 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.

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 Duty to Cooperate 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. This Statement of Consultation is 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. Duty to Cooperate on Strategic Matters

6.1. 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 (up to the Regulation 19 stage).

Housing, including affordable housing

Background

- 6.2. 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.
- 6.3. The London Plan 2021 sets out ten-year housing targets for each London Borough. The [Local Housing Needs Assessment \(LHNA\) 2021](#) by Icenic 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.
- 6.4. 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.
- 6.5. 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 duty to cooperate 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

- 6.6. 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.

- 6.7. 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.
- 6.8. 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.
- 6.9. 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.
- 6.10. 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.
- 6.11. 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.
- 6.12. 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

- 6.13. 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 Duty to Cooperate bodies informed with regard to Richmond's ability to meet the London Plan housing target.

Gypsies and Travellers

Background

- 6.14. 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 research on Gypsies and Travellers in 2013 and 2015 (report published in 2016) suggested that there is no demonstrated need for additional pitches; although there is a need to protect the existing site. 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 accommodation needs assessment and will work to support boroughs in finding ways to make provision for gypsy and traveller accommodation.

Key discussion points

- 6.15. 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.
- 6.16. **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.
- 6.17. **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.

- 6.18. **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

- 6.19. 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.

Employment

Background

- 6.20. The borough [Employment Land & Premises Needs Assessment 2021](#) by Stantec advises 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, there is a shortfall of approximately 73,000 sqm and for future need, it advises the Local Plan should seek to accommodate an additional minimum of 130 jobs per annum and a minimum quantum of 40,000 sqm over the plan period. 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

- 6.21. 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.
- 6.22. **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.

- 6.23. The **GLA** indicated their support for protecting existing employment space, seeking intensification, and directing workspace to town centres.

Next Steps

- 6.24. 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.

Town centres and retail

Background

- 6.25. 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.

Key Discussion Points

- 6.26. 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.
- 6.27. **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.
- 6.28. 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).
- 6.29. 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

- 6.30. 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.

Transport infrastructure

Background

- 6.31. Policies 47 and 48 of the Regulation 18 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

- 6.32. 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.
- 6.33. 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.
- 6.34. 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.

- 6.35. 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

- 6.36. Richmond will continue to share and liaise with Duty to Cooperate 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.

Water supply and wastewater management

- 6.37. 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.

Climate change adaptation

- 6.38. Climate change adaptation 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 \(LoDEG\)](#). 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.

Climate change mitigation

- 6.39. 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.
- 6.40. 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.
- 6.41. 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

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

Health infrastructure

Background

6.43. The Regulation 18 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

6.44. 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.

6.45. 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.

6.46. 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.

Schools and education

6.47. 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

6.48. There is a significant emphasis in the draft Plan on the borough's historic environment. The [Urban Design Study \(UDS\)](#) 2021 by Arup 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

6.49. 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.

6.50. 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.

6.51. **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

6.52. 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.

Natural Environment

Background

6.53. 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. 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

- 6.54. 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 significant influence of Richmond Park on Kingston, and the importance of details around access points.
- 6.55. 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.
- 6.56. 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.
- 6.57. 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

- 6.58. 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'.

Waste management

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

Other issues

- 6.60. 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.

7. Statements of Common Ground

- 7.1. 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.
- 7.2. The Council will prepare a, or a number of, SoCG with neighbouring authorities 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.
- 7.3. The Council has already, where relevant, signed up to a number of SoCG with neighbouring authorities relating to their Local Plan preparation processes. 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. Conclusion

- 8.1. 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.
- 8.2. This Duty to Cooperate Statement, the Consultation Statement and, once prepared, 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. This Duty to Cooperate Statement will be updated prior to submission of the Local Plan to take account of new meetings and ongoing engagement made under the upcoming Regulation 19 consultation with neighbouring authorities and prescribed bodies.

APPENDIX A – Consultation and engagement with Duty to Cooperate bodies

Organisation	Correspondence sent	Meetings/events	Consultation responses	Notes
Prescribed Bodies				
Environment Agency	Prenotification of Regulation 18 DtC/invitation to meet 21.12.21 Regulation 18 bespoke email sent on 12.01.2022	DtC meeting held virtually on 19/01/2022. Meeting notes to be shared with the EA in June 2023	Regulation 18 consultation response received on 07.02.22	
Historic England	Prenotification of Regulation 18 DtC/invitation to meet 21.12.21 Regulation 18 bespoke email sent on 11.01.2022		DoT consultation response received 18.03.2020 Regulation 18 consultation response received on 31.01.22	
Natural England	Prenotification of Regulation 18 DtC/invitation to meet 21.12.21 Regulation 18 bespoke email sent on 11.01.2022		DoT consultation response received on 06.03.2020 (no comments) Regulation 18 consultation response received on 12.01.2022 (no comments) and 18.01.2022	
Mayor of London/Greater London Authority	Prenotification of Regulation 18 DtC/invitation to meet 21.12.21 Regulation 18 bespoke email sent on 12.01.2022	DtC meeting held virtually on 20.01.22 (jointly with TfL) Meeting notes to be shared with the GLA/TfL in June 2023	DoT consultation response received 20.03.2020 Regulation 18 consultation response received on 31.01.22	GLA confirmed the London Enterprise Partnership do not need to be consulted separately. 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.
Civil Aviation Authority	n/a	n/a	n/a	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.

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.	Bespoke email sent on 11.01.2022	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.	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 21.12.21 Regulation 18 bespoke email sent on 12.01.2022	DtC meeting held virtually on 20.01.22 (jointly with the GLA) Meeting notes to be shared with the GLA/TfL in June 2023	DoT consultation response received by TfL on 22.03.2020 Regulation 18 consultation response received on 29.01.22	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	n/a	DoT consultation response received 20.03.2020 Regulation 18 consultation response received on 25.01.22	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 24.02.20 Regulation 18 consultation response received on 31.01.22	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	<p>Prenotification of Regulation 18 DtC/invitation to meet 22.12.21</p> <p>Regulation 18 bespoke email sent on 11.01.2022</p>			
Kingston upon Thames	<p>Prenotification of Regulation 18 DtC/invitation to meet 22.12.21</p> <p>Regulation 18 bespoke email sent on 12.01.2022</p>	<p>DtC meeting held virtually on 25.01.22. Meeting notes to be shared with the Kingston in June 2023</p>	<p>Online DoT consultation response received via the consultation portal</p>	
Hounslow	<p>Prenotification of Regulation 18 DtC/invitation to meet 22.12.21</p> <p>Regulation 18 bespoke email sent on 11.01.2022</p>	<p>DtC meeting held virtually on 03.02.22. Meeting notes to be shared with Hounslow in June 2023</p>	<p>(A follow up email to the meeting was sent by Hounslow, outlining discussions/issues, confirming content to engage via DtC correspondence and not making a formal Reg 18 representation.)</p>	
Wandsworth	<p>Regulation 18 bespoke email sent on 11.01.2022</p>	<p>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</p>	<p>n/a</p>	

		planning issues are kept under review.		
Spelthorne	<p>Prenotification of Regulation 18 DtC/invitation to meet 22.12.21</p> <p>Regulation 18 bespoke email sent on 11.01.2022</p>	<p>DtC meeting held virtually on 17.01.22</p> <p>Meeting notes were shared with Spelthorne on 16.08.22</p>	<p>DoT consultation response received on 27.03.20 – no comments</p> <p>Regulation 18 consultation response received on 24.01.22</p>	
Elmbridge	<p>Prenotification of Regulation 18 DtC/invitation to meet 22.12.21</p> <p>Regulation 18 bespoke email sent on 11.01.2022</p>	<p>DtC meeting held virtually on 24.01.22.</p> <p>Meeting notes were shared with Elmbridge on 09.06.22</p>	<p>Regulation 18 consultation response received on 19.04.22</p>	
Surrey County Council	<p>Regulation 18 bespoke email sent on 11.01.2022</p>		<p>DoT consultation response received on 24.02.20 – no comments</p>	

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

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

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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

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

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
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.

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