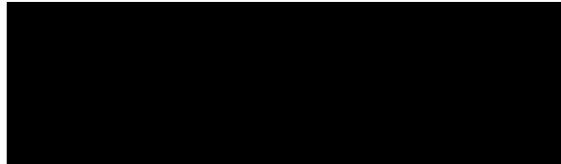


STATEMENT OF COMMON GROUND

1. List of Parties involved:

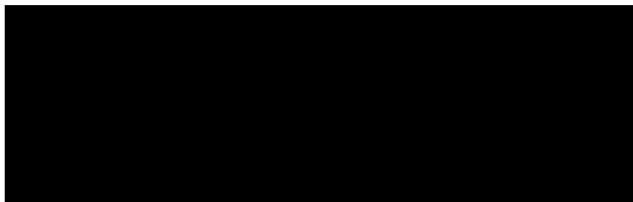
- Elmbridge Borough Council (EBC)
- London Borough of Richmond upon Thames (LBRT)

2. Signatories:



27.07.2023

***Elmbridge Borough Council
Kim Tagliarini, Head of Planning & Environmental Services***



27.07.2023

***London Borough of Richmond upon Thames
Andrea Kitzberger-Smith, Spatial Planning and Design Team Manager***

3. Strategic Geography

The Statement of Common Ground (SOCG) is between the local authorities of Elmbridge Borough Council (EBC) and London Borough of Richmond upon Thames (LBRT).

LBRT lies to the north of EBC with the River Thames separating the two authorities. Hampton Court Bridge (A309) provides the only link point by road. EBC sits within the administrative boundary of Surrey County Council whilst the wider strategic direction for LBRT is provided by the Greater London Authority (GLA).

EBC lies in the Kingston and North-East Surrey Housing Market Area (HMA) along with the Royal Borough of Kingston upon Thames; Mole Valley District Council; and Epsom and Ewell Borough Council. The LBRT has determined that it forms its own HMA, within a London-wide HMA. The two boroughs also fall within different Local Enterprise Partnership (LEP) areas. EBC is located in the Enterprise M3 LEP and LBRT is in LEP for London (LEAP).

Nevertheless, it is acknowledged that within this area, given the proximity and connectivity to the wider GLA area, HMAs and Functional Economic Market Areas tend to overlap. As such there are localised cross boundary linkages between Elmbridge and LBRT.

Figure 1 identifies the strategic geography considered for cooperation on strategic matters as part of the preparation of their respective Local Plans.

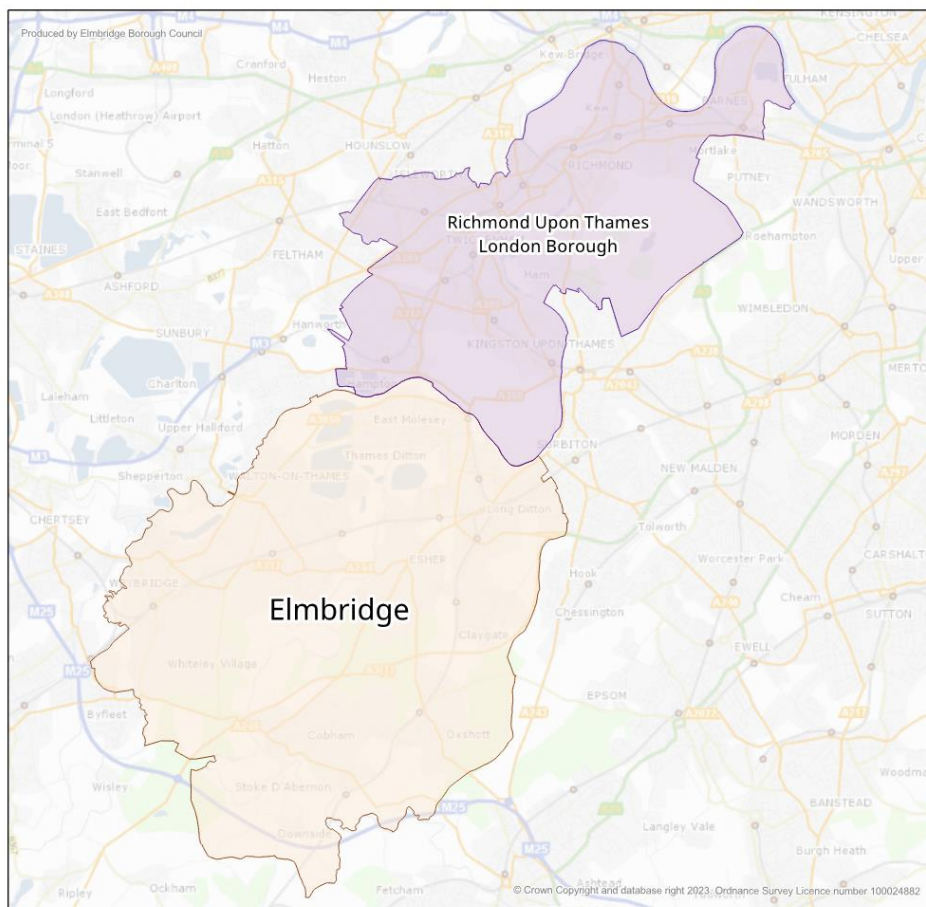


Figure 1: Elbridge Borough and London Borough of Richmond upon Thames

4. Strategic Matters

Duty to Cooperate

EBC and LBRT have engaged with one another to discuss duty to cooperate matters throughout the preparation of their respective (draft) Local Plans. This has included engagement on their evidence base documents; through meetings; and at the Regulation 18 & 19 Stages where relevant to the progress in their Local Plans.

Their duty to cooperate activities up until their respective Local Plan stages, are recorded in the following documents:

- Richmond Duty to Cooperate Statement Local Plan (January 2017).
- Richmond Duty to Cooperate Statement Local Plan (covering up to Regulation 19 stage) (9 June 2023)
- EBC’s Duty to Cooperate Statement of Compliance (June 2022)

Both authorities agree that the above documents are an accurate record of their engagement up until their respective Regulation 19 stages.

Neither party has objected to each other’s latest Local Plan stage for failing to comply with the duty. It is a duty that requires cooperation, not agreement, and the two authorities agree that

they have cooperated in an ongoing and effective manner as set out in their respective Statements and associated updates, as well as this SoCG.

Local Plan Positions

Elmbridge

EBC invited representations on their draft Local Plan (Regulation 19) between 17 June and 29 July 2022. It is the Council's intention to submit its draft Local Plan to the Secretary of State for Levelling-Up, Housing and Communities for independent examination in July 2023.

Richmond

LBRT commenced preparation of a new Local Plan in February 2020, consulting on a Direction of Travel Document which sought comments on what the vision for growth and future development should be. This was followed by Consultation on a 'Pre-Publication' Draft Local Plan (Regulation 18) in December 2021.

Using the feedback submitted during the ['Pre Publication' version consultation](#), a revised Draft Local Plan has been created. Consultation on the 'Publication' Draft Local Plan (Regulation 19) began on 9 June until 24 July 2023.

The submission and examination stages are expected for late summer 2023 to summer 2024 whilst the adoption of the new Local Plan is expected in Winter 2024/25.

Key Strategic Matters:

Through their on-going discussions and LBRT's representation to the Elmbridge draft Local Plan, issues relating to Housing and Green Belt have been identified as key strategic matters. The position of each authority in regard to these matters, is set out as follows:

Housing Need

Elmbridge

The local housing need figure, as set by the Government's Standard Method, is 9,705 (647 dwellings per annum) over 15-years.

Elmbridge's proposed growth strategy focuses on delivering development and increasing capacity in its existing urban areas (a 'brown-field' approach). This includes the reallocation and diversification of employment land, encouraging mixed use development and ensuring the potential of sites is optimised.

This approach provides for 6,785 dwellings, 70% of the local housing need figure. This leaves a local unmet housing need of circ. 2,920 dwellings over its plan period. This includes an element of unmet affordable housing need.

Richmond

The housing target set for the LBRT by the London Plan is 411 homes per annum (4,110 homes across a ten-year period). The Regulation 19 consultation (June 2023) identified that this target should be exceeded where this can be achieved in accordance with other Local Plan policies.

The development strategy for the borough is to encourage higher density development in more sustainable locations, such as main centres and areas better served by public transport, subject to compatibility with established character. It aims to transform the way residents live by applying the Living Locally approach and the 20-minute neighbourhood concept.

Green Belt

Elmbridge

EBC has commissioned Arup Ove to undertake two Green Belt Assessments. The first, Green Belt Boundary Review (GBBR) was published in 2016 and examined the performance of the Green Belt in and around Elmbridge against the Green Belt Purposes, as set out in the National Planning Policy Framework (NPPF). The analysis was undertaken at two scales: Strategic Areas and Local Areas.

The 2018 Supplementary Review was a more spatially focused piece of work to better understand the performance of smaller 'sub-areas' against the Green Belt purposes, as well as their context in relation to the wider Green Belt (Local Areas and Strategic Areas, as assessed through the 2016 GBBR).

In addition to the above, the Council has also undertaken further evidence base work on the Green Belt:

- Green Belt Boundary Review – Assessment of Weakly Performing Local Areas 2019: The assessment identifies the extent of development potential within each Local Areas considered to be 'weakly performing' as part of the GBBR 2016 and sets out whether there is an opportunity for large / small-scale development or no development.
- Green Belt Boundary Review – Accessibility Assessment, June 2019: This assessment looks at the sustainability of specific Green Belt areas (weakly performing and smaller sub-divisions) using a range of accessibility standards.
- Green Belt Boundary Review – Assessment of Previously Developed Land, June 2019: This assessment looks at the level of Previously Developed Land (PDL) within specific Green Belt areas (weakly performing and smaller sub-divisions).
- Green Belt Site Proforma – Utilising the information from the above documents and other evidence base documents, the pro-forma considers specific areas of land for potential release from the Green Belt.

The evidence base documents set out that alongside further assessments and evidence base documents, they will be used to inform the Council's preferred approach for the Local Plan and site selection. This includes whether exceptional circumstances exist to justify releasing land from the Green Belt.

EBC's rationale for its proposed development strategy is set out in the Topic Paper: How the Spatial Strategy was formed (June 2022). The Paper sets out the options assessed when considering how to address the Borough's housing need and includes the Council's consideration of whether exceptional circumstances are fully evidence and justified to release land from the Green Belt. The Paper sets the rationale for the Council's recommended spatial strategy within the draft Local Plan; promoting sustainable development and place-making ambition and responding to the Council's commitment to tackle climate change.

Richmond:

LBRT commissioned Arup to undertake a boroughwide Open Land Review (Green Belt, Metropolitan Open Land (MOL), Local Green Space (LGS) and Other Open Land of Townscape Importance (OOLTI)) in 2021.

Regarding Green Belt, the Review identified five parcels of land which were all assessed as performing strongly against the purpose of Green Belt as set out in National Planning Policy. As such, it was recommended that no further assessment be undertaken.

Through utilising the outcomes of the Review as well as other planning considerations, LBRT has not needed to consider whether exceptional circumstances have been fully evidenced and justified to release land from the Green Belt.

MOL is unique to London and is afforded the same status and level of protection as Green Belt. It plays an important part in London's green infrastructure. There is one MOL site proposed for release, which scored weakly against all the criteria for MOL designation, which the Council proposes to allocate for 100% on-site affordable housing (Site Allocation Car park for Sainsbury's, Uxbridge Road, Hampton).

Transport

Elmbridge:

LBRT lies to the north of EBC with the River Thames separating the two authorities. Hampton Court Bridge (A309) provides the only link point by road.

The Transport Assessment (June 2022) undertaken in support of the draft Elmbridge Local Plan has not identified a potential significant impact on Hampton Court Bridge (A309) as a result of EBC's intended growth strategy. As a result, mitigation is therefore not required.

EBC has a signed SoCG with Transport for London (TfL) confirming their position on the Transport Assessment for the draft Local Plan. This confirms that TfL do not consider that the development strategy for Elmbridge will have a significant impact on the Transport for London Road Network and that there are opportunities to minimise the impact of growth proposed on the Transport for London Road Network through proactive policies surrounding the location of future development and active travel as set out in the draft Local Plan which complement the Mayor's Transport Strategy and London Plan.

Richmond:

LBRT's updated Infrastructure Delivery Plan (2023) sets out the context for transport infrastructure, reflecting the Mayor of London's Transport Strategy and the Council's latest Local Implementation Plan (2019-2041). The mode share target for LBRT in the Mayor's Transport Strategy is for 75% of all trips to be undertaken by walking, cycling and public transport by 2041, from a baseline of 61%.

The scale of development envisaged in the Local Plan is in line with the London Plan 2021 (which was accompanied by a full evidence base and subject to an Examination in Public). The cumulative impact of development on the transport system is considered small, when taking into account existing background travel demand and transport supply, and physical and policy interventions such as the introduction of traffic management schemes, changes in parking control and motoring costs, and investment in sustainable travel modes. The decisions of other organisations (e.g. Hammersmith Council's closure of Hammersmith Bridge, the Royal Parks closure of roads through its parks and any future road based charging scheme) may have as much, if not more, impact on the transport system than local development.

The Council will be producing a background topic paper drawing together the information that already exists that has assisted LBRT to understand the likely traffic impact of the Local Plan, and intend to share this with the relevant Duty to Cooperate bodies including EBC in the autumn ahead of submission of the Richmond Local Plan.

Current positions:

Elmbridge's draft Local Plan – London Borough of Richmond upon Thames' position

- LBRT notes that the draft Elmbridge Local Plan does not meet objectively assessed needs in relation to housing based on the Government's standard methodology.
- LBRT notes the assessment of the option of amending the boundary of the Green Belt to assist in meeting the borough's local housing need alongside EBC's conclusions that exceptional circumstances to justify changes to Green Belt boundaries have not been fully evidenced and justified.
- LBRT notes that EBC are not proposing any amendments to the Green Belt, and that the recommended spatial strategy concentrates growth within urban areas, to strike a balance of meeting EBC's housing, economic and other development needs in sustainable locations, based on the evidence of EBC's local circumstances.
- LBRT are unable to assist in meeting any of Elmbridge's unmet housing need given the challenging housing target set by the new London Plan and its own constraints.
- LBRT do not wish to raise any strategic or cross-boundary concerns regarding the Elmbridge Local Plan.
- It will be for the appointed Inspector(s) to assess and conclude whether the local evidence and circumstances justify the continued strong protection for the Green Belt.

Richmond's Publication Local Plan (Regulation 19) – Elmbridge Borough Council's position

- EBC notes that it is expected that the 10-year London Plan housing target can be met / exceeded within the existing urban areas.
- EBC notes that no release of land from the Green Belt is currently proposed.
- EBC notes that LBRT cannot be relied upon to meet any of Elmbridge's unmet housing need.
- EBC would welcome the opportunity to be involved in the development of the Masterplan / development brief for Allocation 2 – Platts Eyot.
- EBC has concerns that a Transport Assessment has not been completed in support of the LBRT Publication Local Plan (Regulation 19) document which identifies whether there is any potential cross boundary or cumulative impacts on the road network outside of the London Borough. EBC understands that a Topic Paper to address these concerns will be published and shared prior to the submission the Local Plan. EBC welcomes further engagement on this issue.

The parties agree:

1. The proposed development strategies for each Local Planning Authority will be investigated through the Examination-in-Public process and it will be for the Planning Inspector to determine whether they are sound.
2. Despite the difficulties of meeting local housing need, the two authorities will continue to discuss any significant development and changes in housing land supply and approach that could enable the issue of unmet housing to be resolved.

3. To continue to engage on the Strategic Matter of Transport and seek to address EBC's concerns prior to submission of the Richmond Local Plan for Examination.

Matters not specifically addressed within this Statement of Common Ground

The two parties agree:

The following matters are defined in the National Planning Policy Framework as Strategic Matters but are not specifically addressed in the context of this SoCG:

- Gypsies, Travellers, and Traveller Showpeople / Houseboat Dwellers
- Employment, retail and leisure;
- Transport;
- Flooding;
- Minerals, Waste & Utilities;
- Health;
- Education;
- Green & Blue Infrastructure;
- Climate Change; and
- Historic Environment.

The authorities agree that the engagement undertaken on these issues as set out in their respective Duty to Cooperate: Statement of Compliance documents is, an accurate record and that there are no unresolved issues.

It is also agreed that the authorities will continue to work on these matters as appropriate.

5. Governance Arrangements

The authorities are committed to working positively together, sharing information and best practice, where appropriate, throughout the final stages of their plan preparation and beyond. This co-operation and collaboration takes place at senior member, chief executive, and senior officer as well as at technical officer level, where appropriate.

In terms of governance, the authorities agree:

- that in response to any new evidence / changes in circumstances, informal discussions will occur between the two authorities on the cross-boundary issues referred to in this SoCG in the form of officer level meetings with escalation of matters to Member level where necessary;
- that this SoCG will be reviewed at the above meetings or, when required by either authority e.g., for the purpose of their Examination;
- to continue to work collaboratively on plan preparation and evidence, whilst acknowledging others' timetables and timescales; and
- to respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities.