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Spatial Planning and Design
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**Environment Transport and
Infrastructure Directorate
Spatial Planning Team
Surrey County Council
Quadrant Court
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GU22 7QQ**

Emailed to: LocalPlan@richmond.gov.uk

20 July 2023

Dear Sir or Madam,

London Borough of Richmond upon Thames – Local Plan Publication (Regulation 19) Consultation

Thank you for consulting Surrey County Council (SCC) on the Regulation 19 version of the Richmond Local Plan. This is an officer response, and our comments are set out below in relation to the council's role as the responsible authority for highways and transport, minerals and waste and as Lead Local Flood Authority.

Highways and Transport

Where there are likely to be cross boundary impacts of development proposals in the Richmond Local Plan on Surrey's transport network, we consider that these impacts would need to be assessed and appropriate measures identified to resolve them. We would also add that where development in Richmond impacts Surrey's infrastructure and requires mitigation measures, this must be implemented and funded by developers.

Minerals and Waste Planning

SCC welcomes the approach to waste management in the Richmond Local Plan and its emphasis on providing for a circular economy (paragraphs 16.44 to 16.53). Policy 7 seeks to minimise the amount of waste managed by way of disposal and contribute towards the borough being more self-sufficient in managing its waste. However, SCC would suggest that reference is made in Policy 7 to the Waste Hierarchy.

It may also be helpful to reference paragraph 8 of the National Planning Policy for Waste 2014 (NPPW) relevant to Policy 7. This explains how the London Borough of Richmond upon Thames should determine applications for non-waste development in the context of sustainable waste management. Paragraph 4 of Policy 7 does not provide certainty in this regard particularly in respect of the statement that "developments that are likely to generate large amounts of waste, are required to produce site waste management plans to arrange for the efficient handling of construction, excavation and demolition waste and materials". Paragraph 8 of the NPPW explains that for all non-waste development the London Borough of Richmond upon Thames should ensure that "the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities and minimises off-site disposal."

Lastly, in respect of proposed Site Allocation 12 – The Stoop, Twickenham; SCC would advise that the London Borough of Richmond upon Thames carefully consider the implications of the proposed allocation (and any future development pursuant to that allocation) on the continued operation of the existing Twickenham Depot, Langhorn Drive, Twickenham which is safeguarded as Site 342 for waste management purposes by the West London Waste Plan 2015. In this regard paragraph 187 of the National Planning Policy Framework 2021 and the ‘agent of change’ principle is also relevant.

Flooding

We would suggest that policy 8: flood risk and sustainable drainage could be shortened and made more concise through using links and references to the NPPF.

We support part I4 of policy 8 which states that applicants will have to demonstrate that their proposals take into account the River Thames Scheme and demonstrate how the current and future requirements for flood defences have been incorporated into the development. We also note the references to the River Thames Scheme in the Infrastructure Delivery Plan. We would suggest that further reference is made to the River Thames Scheme in the supporting text for policy 8. Surrey County Council is joint applicant with the Environment Agency for the River Thames Scheme. This is a Development Consent Order scheme to reduce flood risk in communities and includes new control gates being installed at the existing weirs at Sunbury in Elmbridge Borough, Molesey in Elmbridge Borough/the London Borough of Richmond and Teddington in the London Borough of Richmond. The River Thames Scheme will be making their own representation.

I hope these comments are helpful. If you require further information, please contact Nikki Nicholson at [REDACTED].

Yours sincerely,

[REDACTED]

Nikki Nicholson
Principal Planning Officer
Surrey County Council