

# Statement of Common Ground Between

## **London Borough of Richmond upon Thames and Spelthorne Borough Council**

*Planning*

26 February 2024

---

## Contents

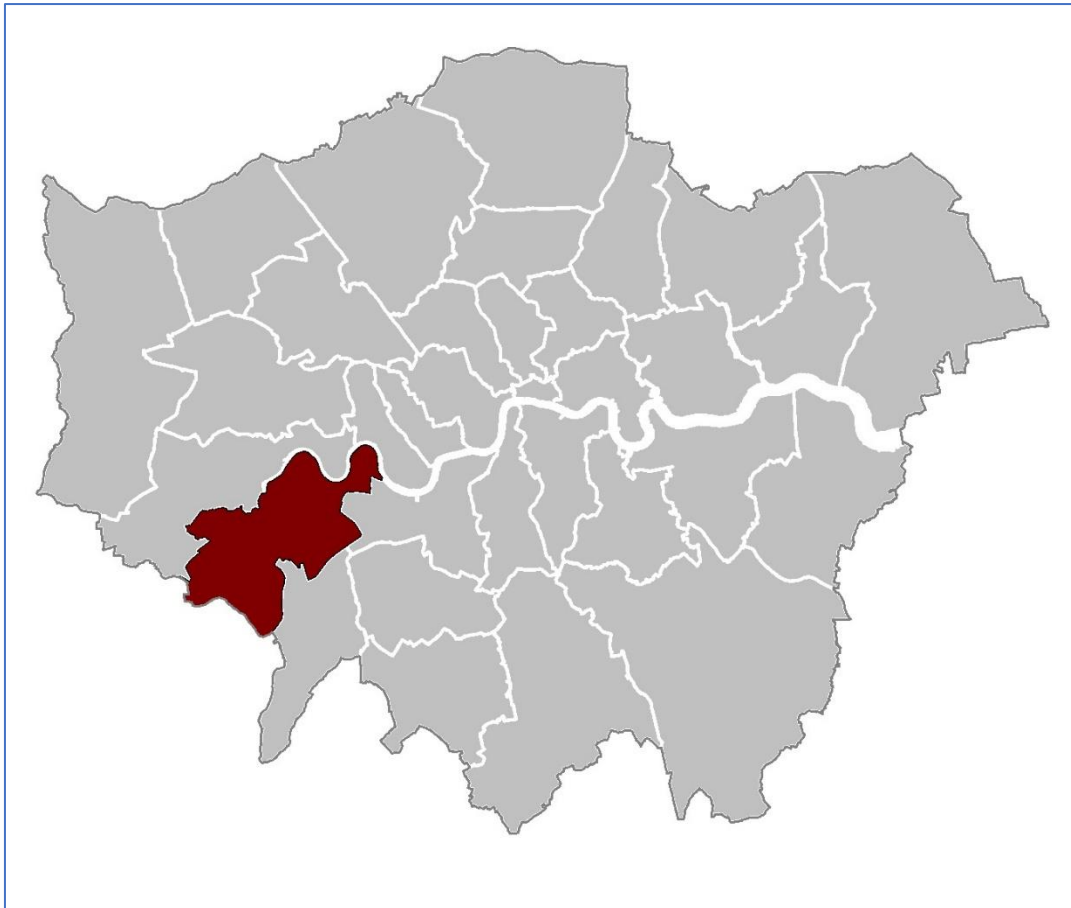
1. Introduction .....	1
2. Strategic Context .....	1
3. Parties Involved .....	2
4. Signatories.....	3
5. Strategic Matters.....	4
6. Table of representations, Council’s response and progress towards addressing strategic cross-boundary issues .....	6

## 1. Introduction

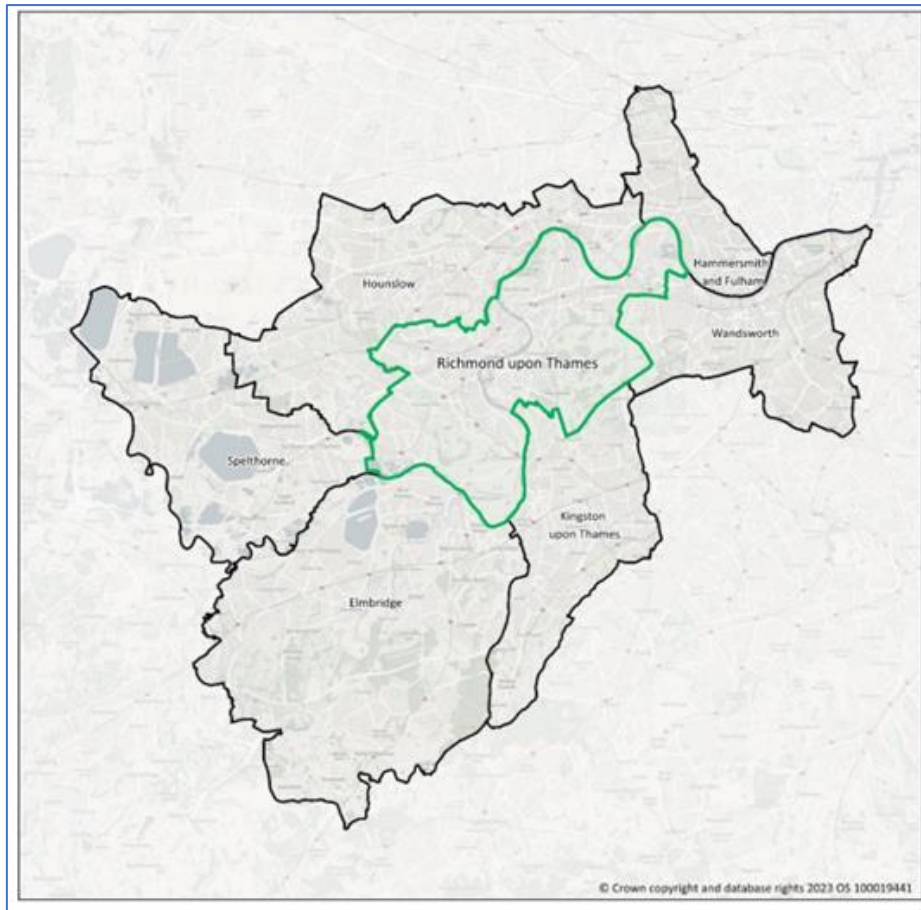
- 1.1 Spelthorne Borough Council formally responded to the Publication Local Plan consultation on Friday 21 July 2023. This Statement of Common Ground (SoCG) sets out the areas of agreement between the London Borough of Richmond upon Thames and Spelthorne Borough Council and the areas where agreement has not been reached on key strategic matters. Updates to this document will be agreed as matters progress and agreement is reached on any outstanding issues.

## 2. Strategic Context

- 2.1 Statements of Common Ground should be read in conjunction with the [Duty to Cooperate Statement \(January 2024\)](#) for the Richmond Local Plan which includes information on strategic matters and context, plan preparation to date and how the Council has cooperated with neighbouring boroughs and other bodies during the preparation of the Local Plan through engagement activities.
- 2.2 In terms of geographical context, Richmond upon Thames is an outer London borough sitting to the southwest of Greater London, one of 32 boroughs plus the Corporation of London (City).



- 2.3 Richmond upon Thames is the only London borough on both sides of the River Thames and 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 within **Surrey County Council**.



- 2.4 Spelthorne Borough Council (SBC) is located south-west of the London Borough of Richmond upon Thames (LBRuT) with the A308 providing the main road connection between the two authorities. The two authorities are also connected via the Shepperton branch railway line.
- 2.5 SBC is one of eleven District/Borough Councils in Surrey. Together with Surrey County Council (SCC) they make up a two tier system of local government. Generally, SCC is responsible for more strategic functions such as education, highways and social care whereas the districts and boroughs provide more local services, with some functions shared between SCC and the districts and boroughs. Each borough and district within Surrey produce its own Local Plan and other development plan documents. SCC, as the Minerals and Waste Planning Authority, produces minerals and waste plans.

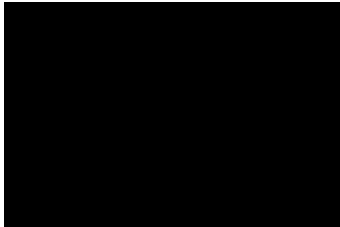
### **3. Parties Involved**

- 3.1 This SoCG has been prepared by the London Borough of Richmond upon Thames in agreement with Spelthorne Borough Council. It addresses strategic spatial policies to be addressed directly by collaboration with Spelthorne Borough Council. The Council is engaged with them on strategic matters on an on-going basis.
- 3.2 Both Councils are committed to ongoing liaison to fulfil the duty to cooperate, utilising the appropriate governance arrangements - informally at officer level and escalation to Member level where necessary.

#### 4. Signatories

- 4.1 London Borough of Richmond upon Thames agrees to matters referred to in this document which directly impact them.

Signed:



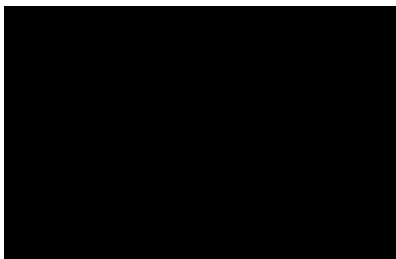
Name: Adam Hutchings

Position: Spatial Planning and Design Team Manager

Date: 26/02/2024

Spelthorne Borough Council agree to matters referred to in this document which directly impact them.

Signed:



Name: Councillor Malcom Beecher

Position: Leader of the Green Group and Chair of Environment and Sustainability Committee

Date: 26/02/2024

## 5. Strategic Matters

### Duty to Cooperate

5.1 Duty to Cooperate activities between LBRuT and SBC are recorded in the following documents:

- [LBRuT Duty to Cooperate Statement \(January 2024\)](#)
- [LBRuT Duty to Cooperate Statement \(Regulation 19\) \(June 2023\)](#)
- [SBC Duty to Cooperate: Statement of Compliance \(November 2022\)](#)

5.2 Matters not specifically addressed within this Statement of Common Ground are discussed within the above documents and both authorities agree that the above documents are an accurate record of their engagement activities and that there are no other unresolved issues.

5.3 It should also be noted that LBRuT is a signatory to SBC's [Joint Statement of Common Ground \(May 2023\)](#) produced to inform the Spelthorne Local Plan (currently at Examination), which is considered to be an accurate reflection of the common ground between each authority. This document is intended to be consistent with the content of that agreement.

### Local Plan Update - SBC

5.4 SBC submitted its draft Local Plan to the Secretary of State for independent examination on 25 November 2022. The first three hearings were held 23 – 25 May 2023 with a further six dates scheduled for June 2023. Following an Extraordinary Council meeting on 6 June 2023, where a motion was agreed to pause the remainder of the Local Plan examination hearings, the Planning Inspector agreed to a pause.

5.5 On 14 September, SBC held an Extraordinary Council meeting to consider a report which outlined three options for the future of the Local Plan. Prior to this meeting, the Secretary of State wrote to the Council outlining its concerns that the Council may withdraw the emerging Local Plan from Examination. This resulted in the Government intervening in the Local Plan process.

5.6 Following this intervention, SBC voted to extend the pause in the Examination timetable until the proposed changes to the National Planning Policy Framework (NPPF) have been published, before determining the next steps. The revised NPPF was published in December 2023. SBC are currently considering its options for the future of the Local Plan.

### Key Strategic Matters

5.7 Through correspondence and discussions between LBRuT and SBC, the following key strategic matters have been identified:

#### *Housing*

5.8 It is agreed by both LBRuT and SBC that housing is and will continue to be a strategic, cross-boundary issues.

5.9 The Local Housing Need for SBC as derived using the Government's Standard Method is 618 dwellings per annum (9,270 dwellings over a 15-year period). LBRuT note that the Regulation 19 Spelthorne Local Plan, through the release of a small amount of Green Belt land, seeks to meet the Local Housing Need target of 9,270 units over the next 15 years through a pipeline of 9,438

new dwellings over the period 2022-2037. This is however, currently being reviewed due to the pause in the Local Plan Examination.

- 5.10 LBRuT's ten year housing target is 4,110 net housing completions (411 per annum) as set by the London Plan (2021). As stated in Policy 10 New Housing (Strategic Policy), LBRuT will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies. SBC have noted this approach and have expressed interest if any surplus supply would be considered to help address any unmet housing need of neighbouring authorities.
- 5.11 LBRuT shared a draft of the Housing Delivery Background Paper with SBC in November 2023 which sets out details of the evidence base in relation to housing delivery using evidence on previous levels of delivery, including build out and lapse rates, and assessing future delivery. This includes the stepped trajectory and updated details from the Housing Authority Monitoring Report 2022/23, to support the approach set out in the emerging Local Plan Policy 10.
- 5.12 A final version of the Housing Delivery Background Topic Paper has been submitted with the Local Plan. It is expected that the issues raised at the Regulation 19 stage are likely to remain issues for consideration during the Local Plan Examination.
- 5.13 As set out within the Housing Delivery Background Topic Paper it will be challenging to meet all of LBRuT's housing target over the Local Plan period given the constrained nature of the borough, therefore, it is highly unlikely there will be any opportunity for LBRuT to assist other authorities in meeting their unmet housing need within LBRuT, both authorities agree that housing will continue to be a strategic, cross-boundary issue and there will need to be continued liaison.

## 6. Table of representations, Council's response and progress towards addressing strategic cross-boundary issues

Text proposed to be **inserted** shown by underlining in blue highlight. Text proposed to be **removed** highlighted in ~~strikethrough~~.

The following table details the matters raised by Spelthorne Borough Council as representations to the Regulation 19 Richmond Local Plan (Publication Plan), and the status of those representations. As documented in the Duty to Cooperate Statement (January 2024) and noted below, the Council has drawn together information in a series of background topic papers. Draft papers on Transport and Housing Delivery were shared with Duty to Cooperate bodies including Spelthorne Borough Council.

The table seeks to provide clarification and clarity to the extent to which matters raised by the Spelthorne Borough Council are resolved or remain unresolved. The table therefore represents the current agreed position in respect of the agreements and differences between the Council and Spelthorne Borough Council.

Section / Policy	Rep No.	Spelthorne Borough Council Representation	Council's Response (including any proposed modifications)	Background Paper ref	Common Ground Agreed?
General	8	<p>Thank you for consulting Spelthorne Borough Council on the London Borough of Richmond Regulation 19 Local Plan.</p> <p>We have in previous correspondence and discussions with LB Richmond identified the following strategic, cross-boundary matters between our local authorities: housing; flood risk, with continued joint working arrangements; and Green Belt.</p> <p>[See comment 345 in relation to housing]</p> <p><u>Spelthorne Local Plan</u></p> <p>The Spelthorne Local Plan was submitted to the Secretary of State for Levelling Up, Housing and Communities for Examination on 25 November 2022. The spatial strategy is centred on an efficient use of brownfield land in the urban area and a small amount of Green Belt release to meet specific needs of the community. The Local Plan is currently under examination and the Week 1 hearings took place in May 2023. However, following an Extraordinary Council Meeting on 6 June 2023 where a motion was agreed to pause the remainder of the Local Plan examination hearings, the Chief Executive wrote to the Planning Inspectorate to put forward this request on behalf of the Council. The Council will meet on 14 September 2023 to determine what actions may be necessary before the Local Plan examination may proceed. We have through the Duty to Co-operate had the opportunity for discussion as part of the process of the preparation of our respective Local Plans but we will keep under review potential implications on</p>	Noted.	N/A	N/A



Section / Policy	Rep No.	Spelthorne Borough Council Representation	Council's Response (including any proposed modifications)	Background Paper ref	Common Ground Agreed?
		<p>strategic matters and the Duty to Cooperate that may arise as a result of the pause and will be in touch in due course.</p> <p>Please note that this response is at officer level and as such, Spelthorne Borough Council reserves the right to raise any further issues during the preparation of the LB Richmond Local Plan if Members of the Council wish to do so. We look forward to continued discussions through the Duty to Co-operate and continued joint working.</p>			
Delivering new homes and an affordable borough for all	345	<p>It is noted that the Draft Richmond Local Plan is proposing to meet the requirement of 4,110 dwellings over a 10-year period as per the London Plan requirement, and that anticipated completions are in excess of this figure, with the latest housing Authority Monitoring Report setting out that the borough is on course to meet and exceed the strategic dwelling requirement over a 10-year period. Furthermore, the Housing Delivery Test has consistently been met and the Borough has not faced any further actions as a result. Given the anticipated exceedance of the London Plan target, we are interested to know if this surplus supply has been considered in cross boundary discussions to help address any unmet needs of neighbouring authorities, particularly those of the Greater London area.</p> <p>Whilst the Mayor of London is responsible for the overall distribution of housing need in London, we recognize that there remains a notable amount of unmet need therefore further work should be undertaken across the wider area to review the implications associated with this and to identify further capacity options to ensure this is met within Greater London.</p> <p>The emphasis on higher density development and smaller units is supported but could have implications for Surrey, since previous under-delivery in London and lack of affordable family units has added to housing pressures in Surrey districts and boroughs, with potential knock-on impacts on infrastructure.</p> <p>We note there are no site allocations proposed in close proximity to the boundary of the two authorities and also note that there is no additional need to plan for additional gypsy and traveller needs in the Local Plan.</p>	<p>The Housing Delivery Background Topic Paper provides detail on the Housing Target for the whole plan period and sets out how this will be met within the borough. The Council has a high level of housing need and is a highly constrained borough with a limited supply of sites, which means meeting the London Plan housing target will be challenging, further detail on this is provided within the Housing Delivery Background Topic Paper. Richmond will continue to work collaboratively with adjacent authorities and accept housing will continue to be a strategic, cross-boundary issue where there will need to be continued liaison.</p> <p>A draft of the Housing Delivery Background Topic Paper was shared with Spelthorne Borough Council on 28 November 2023.</p>	Housing Delivery Background Paper	<p>It is agreed that neither SBC nor LBRuT currently have any spare housing capacity to meet unmet need of other authorities.</p> <p><b>On-going</b> in relation to LBRuT and SBC agree to continue to work collaboratively on the strategic matter of housing.</p>