

# Statement of Common Ground Between

## **London Borough of Richmond upon Thames and London Borough of Hounslow**

*Planning*

11 June 2024

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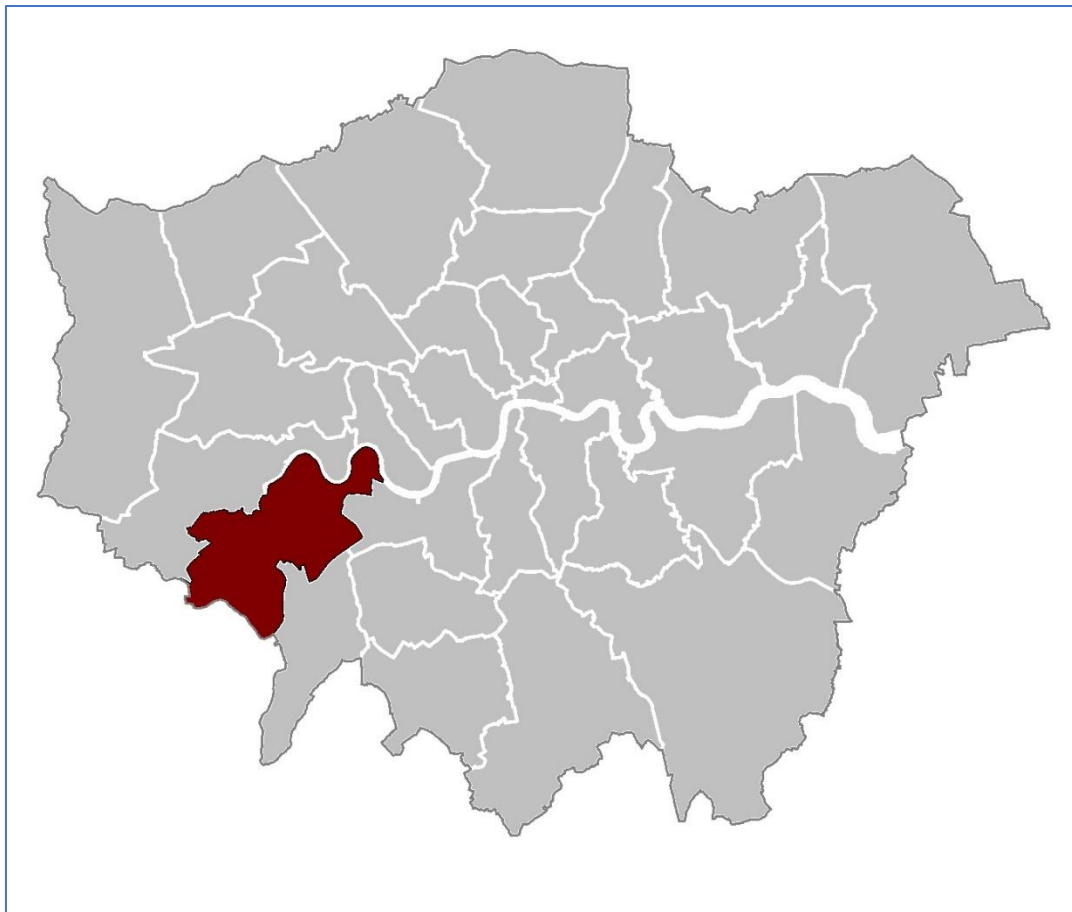
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## 1. Introduction

- 1.1 The London Borough of Hounslow, in their representation dated 31 July 2023 to the Publication Local Plan consultation, made a number of comments. This Statement of Common Ground (SoCG) sets out the areas of agreement between the London Borough of Richmond upon Thames and the London Borough of Hounslow and the areas where agreement has not been reached on key strategic matters. Where appropriate it proposes resulting minor modifications to the Publication Local Plan as submitted for independent examination in public, put forward for consideration during the Examination. These minor modifications are acceptable to and have been agreed by both parties where indicated, and updates to this document will be agreed as matters progress and agreement is reached on any outstanding issues.

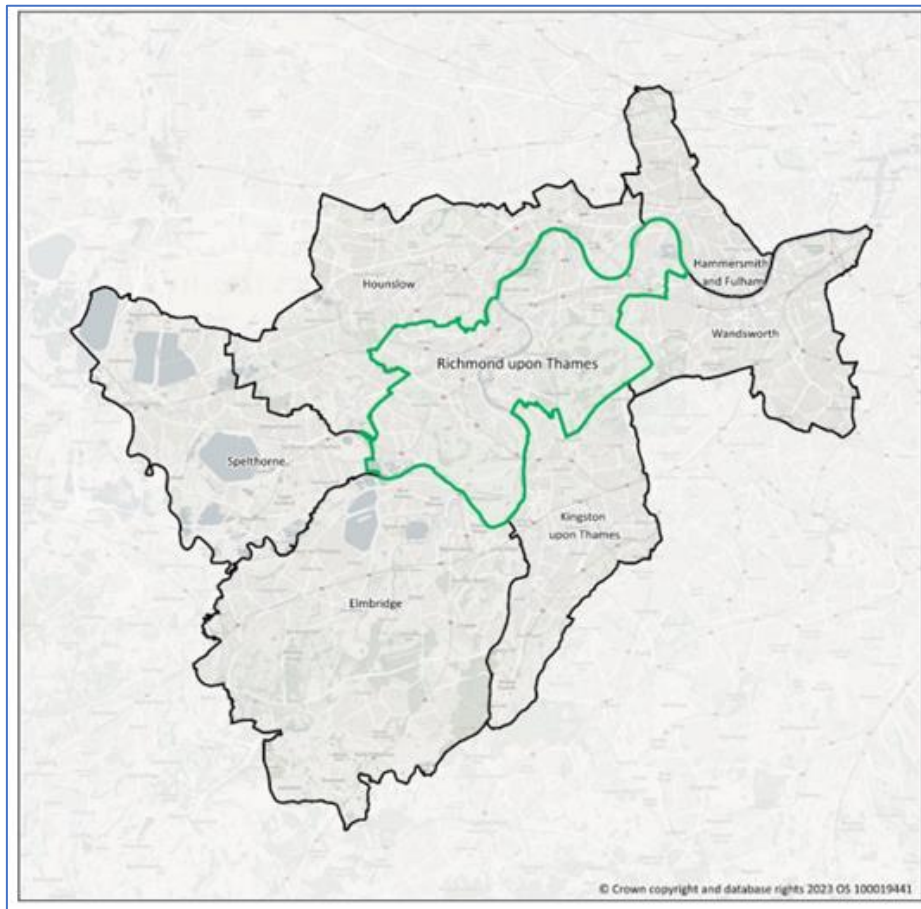
## 2. Strategic Context

- 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 The London Borough of Hounslow (LBH) is located largely north-west of the London Borough of Richmond upon Thames (LBRuT). Isleworth is to the north of Twickenham and Hounslow Heath adjoins the borough boundary to the west. Crane Park extends to the west into LBH and Kempton Park is immediately adjacent to LBRuT’s western boundary. The two authorities are also connected via the Shepperton branch railway line.

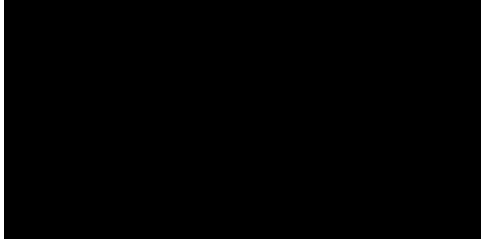
### **3. Parties Involved**

- 3.1 This SoCG has been prepared by the London Borough of Richmond upon Thames in agreement with the London Borough of Hounslow. It addresses strategic spatial policies to be addressed directly by collaboration with the London Borough of Hounslow. 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:

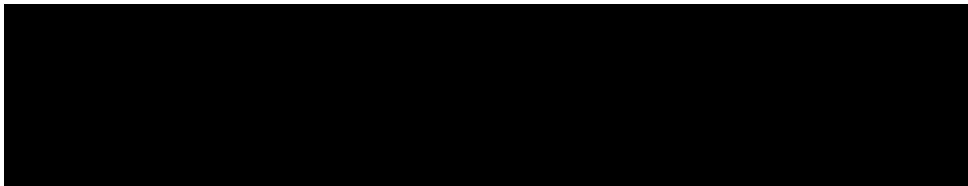


Name: Adam Hutchings

Position: Spatial Planning and Design Team Manager

Date: 11/06/2024

London Borough of Hounslow agree to matters referred to in this document which directly impact them.



Signed:

Name: Vincent Lacovara

Position: Director of Planning and Buildings

Date: 11/06/2024

## 5. Strategic Matters

### Duty to Cooperate

- 5.1 Duty to Cooperate activities between the London Borough of Richmond upon Thames and the London Borough of Hounslow are recorded in the Council's Duty to Cooperate Statements – [the Duty to Cooperate Statement \(June 2023\)](#) was produced to accompany the Regulation 19 consultation and an [updated Duty to Cooperate Statement \(January 2024\)](#) records all the activities undertaken as part of the Publication (Regulation 19) stage and prior to submission of the Local Plan.
- 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 a number of SOCG with LBH produced to inform the progress of documents forming part of Hounslow's Local Plan:
- [Joint SOCG Draft Site Allocations, Great West Corridor & West of Borough Local Plan Reviews \(SOCG1\), 03/09/2020.](#)
  - [Joint SOCG with Royal Botanic Gardens Kew in relation to the Botanic Gardens \(SOCG6\), December 2020.](#)

Although London Borough of Hounslow is now working on a single Local Plan, these previous statements are considered to be an accurate reflection of strategic issues and the common ground between each authority. This document is intended to be consistent with the content of those agreements.

### Key Strategic Matters

- 5.4 Through correspondence and discussions between LBRuT and LBH, the following key strategic matters have been identified:

#### *Housing*

- 5.5 It is agreed by both LBRuT and LBH that housing is and will continue to be a strategic, cross-boundary issues.
- 5.6 Through the Regulation 19 consultation LBH noted the findings of the Local Housing Needs Assessment 2023 and are supportive of the approach included within policies 10 and 11 to support LBRuT's delivery of affordable housing.
- 5.7 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.
- 5.8 LBRuT shared a draft of the Housing Delivery Background Topic Paper and draft Affordable Housing Background Topic paper with LBH in November 2023 which set 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. The Housing Delivery Background Topic Paper 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. The Affordable Housing Background Topic paper includes details of the approach to maximising affordable housing delivery within the LBRuT to support the needs of the borough.
- 5.9 A final version of the Housing Delivery Background Topic Paper has been submitted with the Local Plan.
- 5.10 As set out within LBRuT's 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.

## ***Gypsies and Travellers***

- 5.11 LBRuT's updated research on Gypsies and Travellers has been published, which does not identify a need for additional pitches or any cross-boundary issues. LBH intend to undertake a further site-search exercise to address identified needs for Travelling Showpeople accommodation, which the proposed allocations would not fully meet. Through the Regulation 19 consultation LBH noted the findings of LBRuT's Research on Gypsies and Travellers (updated in 2023) and the associated policy position within Policy 12C.
- 5.12 A London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA) is currently being produced by RRR consultancy. The early findings of the study were circulated by RRR consultancy in October 2023 and boroughs were able to comment on these initial outputs of the study. LRRuT provided a response to these early findings and will continue to work closely with RRR consultancy and other London Boroughs including LBH to ensure the findings of the study are accurate. It is anticipated the final London-wide GTANA will be published later in 2024. The London-wide and borough level research will continue to be the focus of discussion for cooperation between both parties.

## ***Historic environment***

- 5.13 This has been 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 and river views, within LBRuT. The borough consulted in 2022 on a draft Local Views SPD, to which Hounslow responded, and the 'new' views are now being proposed for designation in the Local Plan. It is agreed this is a matter for continued liaison, to ensure both Local Plans set the appropriate policy framework for assessing site-specific proposals.

## ***Transport***

- 5.14 LBH have raised that the potential cumulative impacts of LBRuT's proposed housing growth on both the road network and public transport demand locally be fully assessed and addressed.
- 5.15 LBRuT has produced a Transport Background Topic Paper which sets out the future demand scenarios for the Borough for the lifetime of the Plan and considers the impact on Hounslow. A draft of this Paper was shared with LBH in November 2023. An updated version has been submitted with the Local Plan. LBH have been reviewing the details and are seeking further discussions to arrive at an agreed position through this Statement of Common Ground (or future updates to it).
- 5.16 The Transport Paper sets out the Council's assessment, as per previous Local Plans, that development will have no strategic impact on transport or highways outside the borough and there is nothing unconventional about the policies and site allocations within the emerging Local Plan. The paper brings together some additional information, drawing on the baseline conditions and broader context, including other measures, and using modelling of trip generation forecasts where available.
- 5.17 Following further discussions, a modification to the Plan agreed by both parties is presented in the table below. It is expected that the issues and concerns raised at the Regulation 19 stage are likely to remain issues for consideration during the Local Plan Examination. Both parties agree that transport will continue to be a strategic, cross-boundary issue and there will need to be continued liaison.

## ***Other***

- 5.18 Both parties recognise the need to work collaboratively in relation to Site Allocations close to the boroughs' boundaries and those which could impact on either borough, including any transport issues that may be associated with future development.

5.19 Both parties recognise the need to work collaboratively in relation to the protection of open spaces and land for biodiversity, including as set out above in regard to the Royal Botanic Gardens Kew as a UNESCO World Heritage Site, and designated open land which spans both boroughs in several locations.



## 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 the London Borough of Hounslow 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 LB of Hounslow.

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

Section / Policy	Rep No.	LBH Representation	LBRuT's Response (including any proposed modifications)	Background Paper ref	Common Ground Agreed?
General	20	<p>LBH is broadly supportive of LBRuT's overall spatial strategy, including the focus on Living Locally and 20-minute neighbourhoods, but reluctantly raises a HOLDING OBJECTION to the Local Plan, pending publication and consideration of the further information LBRuT intends to publish in relation to the transport and highways impacts of the Plan.</p> <p>We would welcome the opportunity to engage further on this and other strategic matters through continued duty to cooperate discussions in the coming months. Following this, LBH hope that we can agree positions with LBRuT relating to cross-boundary matters within a Statement of Common Ground at the earliest opportunity.</p>	<p>Comments noted.</p> <p>See response to comment 522 in relation to transport and highways impacts, and the Transport Background Topic Paper sets out the traffic modelling for the Borough for the lifetime of the Plan, and considers the impact on Hounslow.</p> <p>A draft Transport Background Topic Paper was shared with LBH on 28/11/23.</p>	<p>Transport Statement</p> <p>Background Paper: Strategic traffic/ highway impact on other authorities' networks, Table 4 - Estimated impact of development related motor traffic on neighbouring authority highway networks</p>	<p><b>On-going</b> in relation to continued assessment of transport impacts, as it is expected to be a matter discussed at Examination including with other respondents. See comment 522 below.</p>
Site Allocations	82	<p><b>Site Allocations</b></p> <p>LBH note that there are a number of large site allocations located close to the shared boundary which are proposed for residential, amongst other uses</p> <ul style="list-style-type: none"> <li>• Site Allocation 4: Carpark for Sainsburys, Uxbridge Road, Hampton</li> <li>• Site Allocation 18: Homebase, Twickenham Road, Hanworth (<i>new site allocation</i>)</li> <li>• Site Allocation 21: Kneller Hall, Whitton</li> <li>• Site Allocation 31 Kew Retail Park, Bessant Drive, Kew</li> <li>• Site Allocation 35: Stag Brewery, Lower Richmond Road, Mortlake (<i>LBH also note the currently in progress outline scheme on this site for up to 1,085 homes for which LBH have submitted comments – your reference 22/0900/OUT</i>).</li> </ul>	<p>Comments noted. As noted neighbouring boroughs are consulted on major planning applications that might have a material impact across borough boundaries, and boroughs can request mitigation where it would pass the tests for such to be acceptable.</p>	n/a	<p>Agreed that LBRuT will liaise with LBH regarding planning applications for Site Allocations specified and both parties will work collaboratively to address cross-boundary impacts.</p>

Section / Policy	Rep No.	LBH Representation	LBRuT's Response (including any proposed modifications)	Background Paper ref	Common Ground Agreed?
		<p>As discussed at a duty to cooperate meeting between officers from both boroughs on 19<sup>th</sup> July 2023, LBH note that the emerging allocations have been reformatted to include more information relating to existing context and constraints, and that 3 new allocations have been added whilst some have dropped away.</p> <p>LBH also note that no minimum development quanta for either residential units or non-residential floorspace have been provided within site allocations, and no set maximum height parameters. LBH request that should development come forward on these sites, LBRuT engage with our development management officers at the earliest possible opportunity in order to ensure that any cross-boundary impacts can be adequately assessed and addressed.</p>			
Site Allocation 19 Fulwell Bus Garage, Wellington Road, Twickenham	219	<p>LBH also note the proposed Site Allocation 19: Fulwell Bus Garage, which would involve retention and safeguarding of the bus garage operation, unless it is demonstrated that this is operationally no longer needed or that enhanced re-provision has been made elsewhere in a convenient and accessible alternative location (as per supporting text to emerging Policy 47 at paragraph 23.21). Should this site come forward, LBH would urge LBRuT to work with TfL and bus operators to ensure there is no interruption to the operation of the bus garage so as to ensure there are no resulting cross-boundary impacts to public transport provision.</p>	Comments noted.	n/a	Agreed that LBRuT will work collaboratively with TfL and LBH to ensure that public transport provision is maintained if this Site Allocation is implemented.
Policy 10 New Housing (Strategic Policy)	348	<p><b>Housing Policies</b></p> <p>LBH note the findings of the 2023 update to the Local Housing Needs Assessment, and the updated approach to meeting your London Plan housing target (411 dpa) and supporting the provision of affordable housing within Policies 10 and 11.</p> <p>[See also comment 375 on Gypsies and Travellers research]</p> <p>LBH will look to agree positions with LBRUT on meeting housing need through a Statement of Common Ground (SoCG) in coming months.</p>	<p>Additional information on housing delivery and meeting the housing need is within the Affordable Housing and Housing Delivery Background Topic Papers which provides more clarity on how Richmond proposes to meet the housing need.</p> <p>A draft Housing Delivery Background Paper was shared with LBH on 28/11/23.</p>	Affordable Housing and Housing Delivery, in particular section 7 future delivery.	Agreed that both parties will continue to liaise on housing matters, and that both parties will aim to meet their respective 10 year London Plan housing targets, and any additional need identified for the period thereafter, over the plan period. It is agreed that neither party is currently in a position to accommodate any unmet housing need from the other.

Section / Policy	Rep No.	LBH Representation	LBRuT's Response (including any proposed modifications)	Background Paper ref	Common Ground Agreed?
Policy 12 Housing Needs of Different Groups	375	LBH note the findings of LBRuT's Research on Gypsies and Travellers (updated in 2023) and the policy position articulated at Policy 12 C).	Noted. The Council is engaging with RRR Consultancy who are carrying out the London-wide gypsy and traveller accommodation needs assessment. An Additional Modification could be considered to update paragraph 17.46 this report is now due to be published in 2024.  <b>Suggested modification:</b> Update the timescale for publication of the London-wide gypsy and traveller accommodation needs assessment at paragraph 17.46: ... the Mayor will initiate and lead a London-wide gypsy and traveller accommodation needs assessment, with a report due to be published in 2024.	n/a	Agreed that both parties will continue to liaise on Gypsy, Traveller and Travelling Showpeople (GTTS) accommodation matters.  Suggested modification at 17.46 also agreed. .
Policy 23 Offices, Policy 24 Industrial Land	403	<b>Employment Policies</b> LBH note the findings of the Employment Land & Premises Needs Assessment update (2023) with regards to identified need for office and industrial floorspace. LBH also note the plan approach toward avoiding any net loss in existing office or industrial floorspace whilst supporting new development in appropriate locations (Policies 23 and 24). [See also comment 414 on affordable workspace] LBH will look to agree positions with LBRUT on meeting employment needs through a Statement of Common Ground (SoCG) in coming months.	Comments noted.	n/a	Agreed that both parties will continue liaison in relation to employment floorspace need. It is agreed that neither party is currently in a position to accommodate any unmet employment need from the other.
Policy 25 Affordable, Flexible and Managed Workspace	414	LBH also support the approach to the provision of affordable workspace in Policy 25.	Support noted.	n/a	Agreed.
Policy 32 Royal Botanic Gardens,	447	<b>Heritage and Conservation</b> LBH, LBRuT and Royal Botanic Gardens, Kew have engaged extensively throughout the development of LBH's Great West Corridor development plan document in relation to	Comment noted.	n/a	<b>On-going</b> in relation to conservation and heritage matters, including cross-boundary impacts of development on the Royal Botanic Gardens at Kew. In relation

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Kew World Heritage Site		<p>cross-boundary conservation and heritage matters. To date this has looked specifically at the impact of tall buildings in the Brentford area upon the UNESCO World Heritage Site at Royal Botanic Gardens, Kew. This engagement led to the production of a SoCG between the three parties in December 2020.</p> <p>As LBH progress with the consolidated Local Plan Review, we would welcome further engagement on these matters with LBRuT and Royal Botanic Gardens, Kew to ensure that we have fully considered all potential cross boundary impacts as we progress with our Local Plan review.</p>			to the detailed approach to the RBG Kew WHS comments from other respondents suggest there is a difference in views on the detailed policy text to conserve its heritage significance and this is expected to be discussed with other respondents (including the GLA, and Royal Botanic Gardens Kew) and LBH. LBRuT considers discussion of an appropriately worded modification should occur during the Examination process and will involve LBH in any relevant discussions.
Reducing the need to travel and improving the choices for more sustainable travel Transport and Highways Impacts	522	<p>Transport and Highways Impacts</p> <p>LBH note that LBRuT have not produced a strategic transport study and/or a highways impact assessment to support the Regulation 19 consultation on the Publication draft Local Plan. Following our most recent duty to cooperate meeting, it is understood that LBRuT are intending to draw together existing transport and highways information that has assisted LBRUT to understand the likely traffic impact of the Local Plan into a Background Paper, and that this will be shared with interested parties later in the Summer of 2023.</p> <p>Unfortunately, because this information is not available to review at the time of the Regulation 19 consultation, LBH Transport officers have not been able to assess the potential cumulative impacts of LBRuT's proposed housing growth on both the road network and public transport demand locally.</p> <p>It is noted that there are a number of large site allocations located close to the shared boundary which are proposed for residential, amongst other uses (see list above). Given the proximity of these sites to key roads and junctions which cross the shared boundary (specifically the A316 Great Chertsey Road / A312 Hampton Road West/Uxbridge Road, B361 Whitton Road / Whitton Dene and South Circular A205) and the lack of information relating to minimum development quanta for residential units and other non-residential floorspace within the allocations themselves, LBH are not able to determine whether</p>	<p>Comments noted.</p> <p>The Transport Background Topic Paper sets out the traffic modelling for the Borough for the lifetime of the Plan and considers the impact on Hounslow.</p>	<p>Transport Statement</p> <p>Background Paper: Strategic traffic/ highway impact on other authorities' networks, Table 4 - Estimated impact of development related motor traffic on neighbouring authority highway networks</p>	<p><b>Agreed</b> that the Transport Background Topic Paper provides useful context.</p> <p><b>On-going</b> in relation to continued assessment of transport impacts, as it is expected to be a matter discussed at Examination including with other respondents.</p> <p>LBH have reviewed the Transport Background Paper provided following the Regulation 19 consultation. LBH consider that in light of the current approach, it will be appropriate for the scoping of Transport Assessments (TA) for significant major development sites (and especially those close to the borough boundary) identified within the LBRuT Local Plan to be agreed with LBH (and other adjoining LPAs as appropriate). In cases where a TA subsequently concludes there to be any cross-boundary impact on the local transport network in the adjoining LPA, it should be ensured that there is a mechanism for contributions, or other suitable mechanisms such as legal agreements under the Highways Act or Grampian style planning conditions,</p>

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		<p>LBRuT's current proposals would be acceptable in terms of transport and highways impacts.</p> <p>Given the above, LBH raise a holding objection until such time as the evidence relating to the assessment of transport and highways impacts can be reviewed. Should this information demonstrate that there would be no significant cumulative impact upon the road network and public transport demand which would result in cross-boundary issues, LBH will withdraw its objection prior to the commencement of LBRuT's examination hearings.</p>			<p>towards appropriate improvements beyond the borough boundary.</p> <p>LBH suggest that the following text be inserted by way of modification to the supporting text of Policy 47: Sustainable Travel Choices (under the heading 'Assessing the impacts of development'):</p> <p><i>"Proposals for new development must include any necessary mitigation measures required as a result of development to be funded and/or delivered by the developer to ensure the continued safe and efficient operation of the strategic and local road and transport networks. In this regard, the council will continue joint working with adjoining authorities to establish the impacts of proposals on the local road and transport networks both within and outside the borough, and how these might be mitigated and funded, in order to ensure there is no adverse impact on these networks and to continue to enable and encourage cross-boundary active and sustainable travel."</i></p> <p>Both parties agree a modification to the supporting text of Policy 47: Sustainable Travel Choices (under the heading 'Assessing the impacts of development'):</p> <p><b>Proposals for new development will include any necessary mitigation measures required as a result of development to be funded and/or delivered by the developer to ensure the continued safe and efficient operation of the strategic and local road and transport networks. In this regard, the Council will continue joint working with</b></p>

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					<p>adjoining authorities and TfL to establish the impacts of major development proposals on the local road and transport networks both within and outside the borough and how these might be mitigated and funded, in order to ensure there is no adverse significant impact on these networks and to continue to enable and encourage cross-boundary active and sustainable travel.</p> <p>It is agreed this would help to overcome concerns raised by LBH in relation to the potential for significant cross-boundary impacts upon the highways network by clarifying the approach to be taken to securing appropriate mitigation through development and by ensuring greater consistency between our emerging policy approaches.</p>