

Place Division, Chief Executive's Directorate  
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19 January 2024

Dear Plans Team,

## **LONDON BOROUGH OF RICHMOND UPON THAMES – SUBMISSION OF THE RICHMOND LOCAL PLAN TO THE SECRETARY OF STATE**

Please find the details for the documentation constituting the submission of the Council's Local Plan. I can confirm that the relevant delegated authority was granted to the Assistant Director of Environment and Community Services (Planning & Transport Strategy) and subsequently the Interim Director of Place, who have instructed me to formally submit the Plan to the Secretary of State for Examination. I will be the lead planning officer for the purposes of this matter and my contact details are set out above.

The attached indexing list sets out all the documents submitted in electronic format as advised. The list also includes a number of 'Evidence and Other Documents' considered as key supporting documents relevant to the preparation of the Local Plan. Please let me know if you require any hard copies.

As part of the Local Plan consultation and ongoing liaison, the Council is preparing a number of Statements of Common Ground (SoCG) with neighbouring boroughs and other statutory bodies. These refer to a number of Background Topic Papers (SD-019 to SD-022) which have been published for submission drawing together relevant information, having been shared informally as drafts with a number of duty to cooperate bodies, as set out in the Duty to Cooperate Statement (SD-015). The Council is happy to assist with future updates and any others that the Inspector may request. Draft SoCG are being sought with the Greater London Authority on behalf of the Mayor of London, Transport for London (TfL), Historic England, the Environment Agency (EA), National Highways, London Borough of Hounslow, Elmbridge Borough Council, Spelthorne Borough Council and neighbouring local authorities of Surrey County Council, Royal Borough of Kingston upon Thames, London Borough of Wandsworth and London Borough of Hammersmith & Fulham, and will be added to the Examination Library (SO CG-01 and onwards) in due course as they are finalised.

There are several notes for clarification and assistance to the Secretary of State and his appointed Inspector which are set out below.

The Council has initially reviewed the duly made representations made at Publication Local Plan Regulation 19 stage and it is not considered at this stage that it is

necessary for the Council to suggest any proposed changes to the Publication Local Plan. The Council's view is that the Plan is sound; therefore, any changes should be considered as part of the Examination process. Any modifications sought by the Inspector will be subject to public consultation and where necessary Sustainability Appraisal. However, in providing initial responses to the Regulation 19 comments (SD-014) and the initial work on drafting Statements of Common Ground, in a number of areas additional modifications are referenced which could merit consideration during the course of the Examination. The Council is able to provide a schedule of initial Modifications at an appropriate point to aid the Inspector's considerations, which can then be kept up to date during the Examination.

In some areas of evidence base work that were signposted in the Regulation 19 Plan, further work has resulted in the publication of further reports. On the Nature Conservation Sites Review, there have been in 2023 further Salix walk-over surveys and a report, which affect three of the designated sites. The Playing Pitch & Outdoor Sports Assessment and Strategy were also adopted by the Council in November 2023 and published on the website. These are considered to fit with the emerging Local Plan and are therefore included as submission documents, and can be the subject of consideration of Additional Modifications in due course. There is ongoing work on a Leisure Strategy. No further evidence base is considered necessary at this stage, however it may be relevant during the course of the Examination process for some sensitivity testing to update the draft Whole Plan Viability Assessment and Retail & Leisure Needs Assessment if it would be helpful.

The Council notes the publication of the revised NPPF in December 2023 which while effective immediately sets out at Annex 1 that plans that reach pre-submission consultation on or before 19 March 2024 will be examined under the relevant previous version of the Framework. The Soundness and Legal Compliance Self-Assessment Checklists which are submission documents have been considered substantially against the September 2023 NPPF, as well as all the other submission documents. However, to aid the Inspector's consideration, officers have conducted a high level review of the key changes in the revised NPPF to note any implications for the Richmond Local Plan, see the table in the submission document (SD-024). The Council considers this does not identify any changes that have significant implications for submission of the Local Plan. Other Government publications in December 2023 are also noted, and likely to be considered as relevant during the course of the Examination. In particular noting the implications of the Housing Delivery Test 2022 that was published by Government in December 2023. As housing delivery now falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years. The Housing Delivery Background Topic Paper submission document (SD-019) is a useful stepping stone setting out the Council's position on housing delivery, and the Council is committed to working up an action plan by June 2024.

The comments received by the Council to the Publication Version Regulation 19 consultation are set out as a separate Appendix to the Regulation 22 Consultation Statement in plan/policy order including any comments relating to the Sustainability Appraisal and Policies Map changes. There is also a published webpage with all the comments on (any personal details redacted). Please let us know if you would find a different format more helpful. Please notify us if you have any queries.

The submission Local Plan webpage can be found here:

[www.richmond.gov.uk/draft\\_local\\_plan\\_submission](http://www.richmond.gov.uk/draft_local_plan_submission)

The examination webpage can be found here, with details of the Programme Officer and ready to add future correspondence with the Inspector:

[www.richmond.gov.uk/draft\\_local\\_plan\\_examination](http://www.richmond.gov.uk/draft_local_plan_examination)

The name of the appointed Programme Officer along with their contact details is Banks Solutions – the main/allocated contact is Charlotte Glancy and the company contact details are:

C/O Banks Solutions  
80 Lavinia Way  
East Preston  
West Sussex  
BN16 1DD  
Tel: 01903 776601  
M: +447519 628064  
[bankssolutionsuk@gmail.com](mailto:bankssolutionsuk@gmail.com)

The Council's preferred dates for the Examination hearings is to avoid any holiday periods such as Easter, and will otherwise depend of course on the Inspector's work pattern and what is considered relevant and necessary. The Council would estimate in the region of 10 - 15 days over 3 – 5 weeks for the hearings but this is only an approximate estimate at this stage and will depend on the range and complexity of the matters, issues and queries to be identified by the appointed Inspector(s). The Council is willing to host both in person and/or virtual hearings as the Inspector considers necessary.

A Purchase Order number is being set up for PINS, and details will be sent separately to you.

In accordance with section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended), the Council requests that the Inspector recommends main modifications as necessary to make the plan sound and legally compliant.

I look forward to hearing from you in due course.

Yours faithfully,

Joanne Capper, Principal Policy and Information Planner