

# Duty to Cooperate Monitoring 2017- 2023

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London Borough of Richmond

*1 May 2024*

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## Context

1. The Localism Act requires local authorities to prepare a report, which should include (amongst other things) information on how the Council has met its Duty to Cooperate. This statement covers cooperation that has taken place on strategic planning issues under the Duty to Cooperate between 1 April 2017 and 31 March 2023.
2. The Duty to Cooperate was introduced under the Localism Act 2011. It places a legal duty on Local Planning Authorities (LPAs) to 'engage constructively, actively and on an on-going basis with other LPAs and public bodies in relation to strategic cross-boundary matters.
3. Para 24 (Previously paragraph 178 NPPF 2012) of the National Planning Policy Framework (2023) sets out the strategic priorities that public bodies have a duty to cooperate on in the preparation of the Local Plan. These are:
  - The homes and jobs needed in the area;
  - The provision of retail, leisure and other commercial development;
  - The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - The provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation, and enhancement of the natural and historic environment, including landscape.

### **Duty to Cooperate initiated by other authorities and prescribed bodies.**

1. This Monitoring Report only covers Duty to Cooperate activity and engagement activities initiated and requested by other prescribed bodies.
2. The tables below set out the Duty to Cooperate activity undertaken throughout the financial years 2017/18, 2018/19, 2019/20, 2020/21, 2021/22 and 2022/23. It covers other Authorities' Planning Documents, set out by strategic issue. It can be seen that the borough is part of a number of formal joint working groups.
3. The borough also positively engages with the GLA in the preparation and monitoring of the spatial development strategy for London – known as the London Plan, and any alterations or reviews, which cover strategic issues particularly housing, retail and employment. The borough also contributes to research projects such as the GLA's Town Centre Health Checks. The Mayor of London and the GLA are also strongly committed to working with authorities and agencies in the East and Southeast of England to co-ordinate approaches to strategic issues of common concern.
4. For Duty to Cooperate activities and engagements carried out and initiated by LB Richmond, particularly with regard to the development of the Local Plan, please refer to the Local Plan: [www.richmond.gov.uk/services/planning/planning\\_policy/local\\_plan](http://www.richmond.gov.uk/services/planning/planning_policy/local_plan) which have been supported by separate Duty to Cooperate Statements.

## 2017/2018

Strategic Issue	Details/ Activity Undertaken	Body Involved	Outcomes	Date
Employment and industry	Local Plan Employment and Industry Document	Wandsworth Council	Richmond noted Wandsworth's approach to a range of issues within the Employment and Industry Document and feel that we have nothing further to discuss at this time and a meeting is not considered necessary.	23/05/2017
Green Belt and Metropolitan Open Land Assessment	Consultation on the proposed Kingston upon Thames Local Plan, Green Belt and Metropolitan Open Land Assessment Methodology	Royal Borough of Kingston Upon Thames	Richmond made comments regarding site of Metropolitan land sites that lie on the river and the potential impact it could have of the openness, character and ecology of the adjoining designated area. Richmond also notes that Kingston Vale is a National Nature Reserve, London's largest Site of Special Scientific Interest and a European Special Area of Conservation. No further comments to make on the proposed methodology.	10/08/2017
Green Belt Boundary Review (GBBR) 2016	Consultation on the Methodology for Elmbridge Green Belt Boundary Review Supplementary Work.	Elmbridge Borough Council	No comments were made in regard to the methodology at the time.	06/12/2017
Growth and infrastructure	Consultation on the proposed Surrey Local Strategic Statement 2016 - 2031	Surrey County Council	Richmond have made comments were regarding the strategic cross-boundary issues in line with those identified in the Interim Local Strategic Statement. The sub-area priorities for the Upper M3 were also noted.	05/02/2018
Housing Issues	London Borough of Hounslow Local Plan review	London Borough of Hounslow	Richmond welcomed discussions with Hounslow given sensitivities along this boundary.	16/06/2017

Strategic Issue	Details/ Activity Undertaken	Body Involved	Outcomes	Date
	Duty to co-operate meeting.			
Housing Need	Runnymede 2030 Draft Local Plan Consultation	Runnymede Councils	Richmond and Runnymede Councils do not share a borough boundary; the authorities lie in separate housing market areas; and in particular we have already discussed Richmond would be unable to take any unmet need.	21/02/2017
Site Allocations	Consultation on the proposed Local Plan - Great West Corridor	London Borough of Hounslow	Richmond noted the sensitivities around the Great West Corridor and potential impacts upon Kew World Heritage Site.	16/06/2017
Sport and Leisure	Consultation on the proposed Kingston upon Thames: Leisure Feasibility Master Plan for Kingston	Royal Borough of Kingston upon Thames	<p>Richmond was happy to assist and pointed out that KKP also undertook the sports evidence base assessments for Richmond and would understand local needs.</p> <p>Kingston wanted comments regarding.</p> <ul style="list-style-type: none"> <li>• Producing recommendations and proposals which explicitly detail where future leisure facilities within the Borough should be located; the rationale for them, their scale, scope, relationship to the community serviced, to each other and to other sport, leisure, cultural and community facilities.</li> <li>• Preferred options for the future</li> <li>• Providing cost summaries and projections and set out programme priorities in the context of what to invest in, where, what and in what order</li> </ul>	31/01/2018
Traveller Accommodation	Consultation on the Gypsy and Traveller	Royal Borough of Kingston upon Thames	Richmond and Kingston have no cross-boundary issues regarding Gypsy & Travellers.	19/02/2018

Strategic Issue	Details/ Activity Undertaken	Body Involved	Outcomes	Date
	Accommodation Needs Assessment			
Traveller Accommodation	West London Gypsy and Traveller Accommodation Assessment	London boroughs of Barnet, Brent, Ealing, Hammersmith and Fulham, Harrow, Hillingdon, Hounslow	Richmond has identified no cross-boundary issues have been identified regarding Gypsy & Travellers.	19/02/2018
Waste Management	Consultation on Proposed Main Modifications to the Buckinghamshire Minerals and Waste Local Plan	Buckinghamshire County Council	Richmond does not anticipate any change in the export in waste movements to Buckinghamshire County Council.	26/05/2017
Waste Management	Consultation on Proposed Main Modifications to the Riverside Waste Movements	Western Riverside Waste Authority, London Boroughs of Kensington and Chelsea (RBKC), Hammersmith and Fulham (LBHF), Lambeth (LBL), Wandsworth (LBW) and the Old Oak and Park Royal Development Corporation (OPDC) for land within LBHF.	Richmond does not anticipate any change in the export in waste movements.	10/05/2017
Waste Management	Consultation on Proposed Adoption Statement for council's strategy and	Essex CC and Southend-On-Sea Borough Council	Richmond did not make any comments regarding this matter and both Essex County Council and Southend-On-Sea Brough Council have adopted their joint Waste Local Plans.	20/12/2017

Strategic Issue	Details/ Activity Undertaken	Body Involved	Outcomes	Date
	policies for Waste Development until 2032			
Waste Management	Consultation on Proposed Surrey Waste Local Plan from 2018 till 2033	Surrey County Council	<p>Richmond notes that the proposed sites are in the Green Belt but that the allocation of sites in the SWLP does not necessarily mean that very special circumstances exist and each application to be considered on its merits.</p> <p>Richmond states to ensure that strategic waste movements are taken into account and that strategies and policies in the draft London Plan are consistent with adjoining regional waste planning areas continued collaboration between the County, SEWPAG, East of England RTAB and the London Waste Planning Forum is supported.</p>	16/10/2017
Waste Management	LB Richmond upon Thames Waste Management Information Request	Heathrow Expansion Programme	There are no immediate plans to update the Joint West London Waste Plan, which is part of the Development Plan for this borough. There is very little land available for industrial uses in LB Richmond and even fewer sites available for waste management. Those existing waste sites that we have are safeguarded in the WLWP.	11/09/2017

## 2018/19

Strategic Issue	Details/ Activity Undertaken	Body Involved	Comments Made	Date
Green Belt	Spelthorne Local Plan Issues & Options consultation paper	Spelthorne Borough Council	Richmond notes that some of the green Belt designations wash over the boundary between the two boroughs in a continuous swathe to form a larger significant open area. We note the GB Review Stage 1 Assessment and the Strategic Land Availability Assessment (SLAA), and that none of the options in the consultation would consider release of strongly performing Green Belt for development.	15/06/2018
Housing Need	Spelthorne Local Plan Issues & Options consultation paper	Spelthorne Borough Council	Richmond recognises this as a strategic and cross boundary issue. Richmond notes the Plan is unable to meet the objectively assessed housing and employment needs. Richmond raises concerns in regard to using the standardised methodology for calculating housing need set out by the Government.	15/06/2018
New private and affordable homes, community facilities, new jobs, local need retail and most importantly, the protection and enhancement of the listed buildings.	Draft planning brief for the Cavalry Barracks site in Hounslow West	London Borough of Hounslow (The Ministry of Defence seeking to release the site)	No comments were raised and the planning brief was later adopted.	12/02/2019
Property Market	West London commercial property market assessment	Hillingdon, Harrow, Hounslow, Barnet, Ealing, Brent, Old Oak and Park Royal Development Corporation	Richmond notes we don't have all the information that was requested however provided links to the Employment Floorspace Monitoring document and details from the LDD for all non-housing completions between 01/04/2004-01/04/2017 and an extract from LDD has the non-housing pipeline as at 01/04/2017.	04/06/2018
Site Allocations - Great West Corridor and West of Borough	Great West Corridor and West of Borough Meetings	London Borough of Hounslow	There were no comments to raise regarding the site.	26/10/2018

Strategic Issue	Details/ Activity Undertaken	Body Involved	Comments Made	Date
	London Borough of Hounslow Local Plan review meetings			
Site Allocations - Kempton Park Racecourse Development	Spelthorne Local Plan Issues & Options consultation paper.	Spelthorne Borough Council	Richmond raised concerns at the potential impact within this borough, including additional demand on local infrastructure and the potential for short distance journeys over the borough boundary to take advantage of the London travel zone.	15/06/2018
Statement of Community Involvement	Consultation on the Draft Statement of Community Involvement (SCI) 2018	Elmbridge Borough Council	No comments made	05/10/2018
Waste Management	Surrey Waste Local Plan	Surrey County Council	No concerns therefore no comments were made	11/01/2019
Waste Management	Consultation on Minerals and Waste Local Plan	Oxfordshire County Council	No comments were raised	03/10/2018



## 2019/20

Strategic Issue	Details/ Activity Undertaken	Body Involved	Comments Made	Date
Business and Jobs	Consultation on Kingston Borough Council Local Plan Early Engagement document	Royal Borough of Kingston upon Thames	Richmond supports the policy he protection of existing employment floorspace and the provision of new floorspace is considered to be particularly important in terms of maintaining employment choice locally. Richmond has deemed that this would provide adequate floorspace for small businesses that serve local residents and other local businesses, which will inevitably cross borough boundaries. Existing amount of employment floorspace is re-provided when sites are redeveloped in protected employment locations, but also on non-designated employment sites.	26/07/2019
Green Belt and Metropolitan Open	Consultation on Kingston Borough Council Local Plan Early Engagement document	Royal Borough of Kingston upon Thames	Richmond has identified the importance of MOL associated with the River Thames (such as parks and open spaces), protected views and vistas as well as sites of historic importance (including their settings) such as Hampton Court, of being retained and improvements when possible. Reviewing this Land may help the borough meeting London Plan Housing targets.	26/07/2019
Housing Need	Consultation on the proposed Elmbridge Local Plan Regulation 18 Consultation	Elmbridge Borough Council	Richmond identifies housing cross-boundary issue and recognise the importance of planning to meet identified needs, along with taking a consistent approach to matters such as the River Thames and Green Belt. As previously stated Richmond does not wish to comment on the details of the options.	16/09/2019
Housing Need	Consultation on Kingston Borough Council Local Plan Early Engagement document	Royal Borough of Kingston Upon Thames	Richmond comments that officers should be updated with the updates regarding the evidence lead research as this matter has been identified as a cross boundary strategic matter with a particular focus on	26/07/2019

Strategic Issue	Details/ Activity Undertaken	Body Involved	Comments Made	Date
			student housing with Kingston university as there is already accommodation located in Hampton Wick within Richmond	
Materials and Waste Management	Consultation on the Proposed Kent Mineral Sites Plan	Kent County Council	Richmond supported the document	28/02/2019
Protected Urban Open Space	Consultation on Local Green Space Assessment Methodology as part of on-going work for the emerging Local Plan 2020-2035.	Spelthorne Borough Council	No comments made regarding the methodology. Unlikely to have any cross-boundary implications. LGS designation will replace one of their existing ones rather than adding to the whole raft of designations most boroughs already have.	01/05/2019
Site Allocations	Elmbridge Local Plan Regulation 18 Consultation	Elmbridge Borough Council	Richmond did not find it necessary to comment on the strategic locations and agrees that the level additional technical work you have undertaken and agree the level of detail in each technical document is proportionate to the plan making stage. Richmond notes that if any amendments to the Green Belt occur, then it will need to provide clear justification as to the amount of land and its broad location as well as the exceptional circumstances relating to each specific site/ location proposed to be removed from the Green Belt.	16/09/2019
Site Allocations	Consultation on London Borough of Hounslow Local Plan	London Borough of Hounslow	Richmond made comments regarding the concern of building within the Borough of Hounslow, particularly within the West of the borough, such as Brentford taking precedent over the potential impact on Kew World Heritage Site. Richmond supports policies that put emphasis on achieving high quality design, including that clear and convincing justification for any harm will need to be made, which is considered in accordance with the NPPF.	06/09/2019

Strategic Issue	Details/ Activity Undertaken	Body Involved	Comments Made	Date
			Richmond also notes the site allocation for a Tesco Extra at Mogden Lane and has requested to be updated of the progress so Richmond can assess any changes to retail provisions due to its proximity to Twickenham Town Centre.	
Site Allocations	Consultation on Kingston Borough Council Local Plan Early Engagement document	Royal Borough of Kingston- upon Thames	Richmond has identified sites that it would be considered to have an impact on the character and setting of Richmond borough	26/07/2019
Site Allocations	Consultation on the proposed Spelthorne Borough Council Plan. Preferred Options consultation documents	Spelthorne Borough Council	No sites proposed in the Site Allocations document in close proximity to the boundary of the two authorities.	16/01/2020
Site Allocations	Consultation on the proposed Spelthorne Borough Council Plan. Preferred Options consultation documents	Spelthorne Borough Council	Richmond supports the position taken for Kempton Park racecourse, and the reasoned justification for exclusion, given our earlier concerns regarding the potential transport impact on our borough.	16/01/2020
Statement of Common Ground	Consultations on the Proposed Great West Corridor and West of Borough Local Plan Reviews	London Borough of Hounslow	Richmond identifies they are not a part of the Heathrow Strategic Planning Group however, the future of Heathrow is a strategic matter to Richmond.	06/09/2019
Tall Buildings	Consultation on Kingston Borough Council Local Plan Early Engagement document	Royal Borough of Kingston upon Thames	<p>Richmond suggests using local, evidence-based, definition of a tall building rather than adopting the more general standards outlined within the draft New London Plan</p> <p>Given the cross-boundary implication of tall buildings Richmond have requested that communications regarding tall buildings remains open.</p>	26/07/2019

Strategic Issue	Details/ Activity Undertaken	Body Involved	Comments Made	Date
Transport	Consultation on Kingston Borough Council Local Plan Early Engagement document	Royal Borough of Kingston upon Thames	Richmond is supportive of the attempts to promote sustainable transportation. Richmond requests that we are kept up to date regarding new locations of parking controls where they are close to the borough boundary.	26/07/2019
Visitors and Town Centre	Consultation on Kingston Borough Council Local Plan Early Engagement document	Royal Borough of Kingston upon Thames	No detailed comments to make.	26/07/2019
Waste Management	Consultation on Early Partial Review of the Kent Minerals and Waste Local Plan 2013-30	Kent County Council	Richmond raised no comments.	28/02/2019

## 2020/21

Strategic Issue	Details/ Activity Undertaken	Body Involved	Comments Made	Date
CIL Viability Assessments	Consultation on the proposed Spelthorne Borough Council Local Plan Viability Assessment	Spelthorne Borough Council	Richmond has made no further comments, given the housing market is very different between the two boroughs.	15/06/2020
Housing Need	Consultation on the proposed Spelthorne Borough Council Local Plan	Spelthorne Borough Council	Richmond identifies that housing needs is a strategic cross-boundary issue however, Richmond does not have the capacity to meet any unmet needs from neighbouring boroughs.	15/06/2020
Marine Plans	Consultation on the Draft Southeast Marine Plan	Marine Management Organisation	Richmond supports the proposed policies however it does comment that the setting of heritage assets such as the historic palaces on the Thames and the special character of the Thames itself should be recognised and protected.	09/04/2020
Statement of Common Ground	Statement of Common Ground for Hounslow Local Plan Review, Great West Corridor Local Plan Review, GWC Mater Plan and Capacity study	Joint with London Borough of Hounslow and Royal Botanic Gardens Kew	Richmond has raised concerns regarding the height of tall and focal buildings that will be visible from RBGK WHS and has recommended that these heights are reduced to mitigate the impact. Richmond does not agree there has been an adequate assessment of potential impacts on the World Heritage Site. The signed Statement of Common Ground was later published <a href="#">Joint SOCG with Royal Botanic Gardens Kew in relation to the Botanic Gardens (SOCG6), December 2020.</a>	14/12/2020
Statement of Common Ground	Consultation on the strategic matters relating to the Statement of Common Ground by Brent Borough Council.	London Borough of Brent, London Borough of Barnet, London Borough of Camden, London Borough of Ealing,	Richmond agreed that the strategic matters that directly impact them would be matters relating to Industrial capacity and Waste management.	06/04/2020

Strategic Issue	Details/ Activity Undertaken	Body Involved	Comments Made	Date
		London Borough of Hammersmith and Fulham, London Borough of Harrow, London Borough of Hounslow, Royal Borough of Kensington and Chelsea , Old Oak and Park Royal Development Corporation, Westminster City Council Mayor of London (represented by the Greater London Authority)		
Statement of Common Ground	Statement of Common Ground for LB Hounslow Site Allocations, Great West Corridor & West of Borough Local Plan Reviews	Joint with Spelthorne Borough Council, London Borough of Ealing, London Borough of Hammersmith and Fulham, London Borough of Richmond upon Thames, Slough Borough Council, Runnymede Borough Council, London Borough of Brent, London Borough of Barnet, London Borough of Harrow, Old Oak and Park Royal Development Corporation (OPDC),	Richmond signed and agreed that the strategic matters of Housing, Employment, Retail, Green Belt and Environment, Infrastructure and Conservation are strategic matters that cross boundaries between the two boroughs. The signed Statement of Common Ground was later published <a href="#">Joint SOCG Draft Site Allocations, Great West Corridor &amp; West of Borough Local Plan Reviews (SOCG1), 03/09/2020</a> .	05/08/2020

Strategic Issue	Details/ Activity Undertaken	Body Involved	Comments Made	Date
		Historic England and Transport for London.		
Thames Estuary	Thames Estuary 2100 Council Workshop- Council Ways of Working Workshop	Environment Agency	Richmond attended this workshop and contributed to comments regarding Council briefings, Riverside Strategy Approach and Key Challenges and potential solutions.	03/11/2020
Waste Management	Consultation on Hampshire County Council strategic mineral and waste movements	Hampshire County Council	Richmond made comments regarding the waste movements and did not find it a strategic matter for Richmond.	14/10/2020
Waste Management	Consultation on the draft South London Waste Plan	London boroughs of Croydon, Kingston upon Thames, Merton, Sutton	Richmond comments that the Plan is legally compliant, sound and complies with the duty to cooperate. Richmond comments that the waste transferred between South London Waste Plan boroughs and LB of Richmond is below the target to be significant expect for hazardous waste. It has been noted that the Plan is to meet the Mayor's apportionment figures. Notes there is regular liaison through the London Waste Planning Forum.	20/10/2020
Waste Management	Consultation on the proposed Waste Local Plan	Hertfordshire County Council	Richmond notes it does not need to be a signatory on the Statement of Common Ground as the levels between boroughs does not suggest a significant impact and overall, a low proportion of waste arising movements.	15/02/2021

## 2021/22

Strategic Issue	Details/ Activity Undertaken	Body Involved	Comments Made	Date
Housing Need	Consultation on the proposed Elmbridge Local Plan	Elmbridge Borough Council	Richmond is unable to assist in plannings for Elmbridge's unmet housing need due to its constrained housing land availability.	11/11/2021
Housing Need	Consultation on the proposed Local Plan	Mole Valley District Council	Richmond comments that the borough is unable to assist with any unmet housing need due to its constrained housing land availability.	11/05/2021
Site Selection Methodology Update	Consultation on the proposed Local Plan and the site selection methodology	Spelthorne Borough Council	Richmond had no comments to make regarding this subject	20/01/2022
Statement of Common Ground	Wandsworth Local Plan – draft Statement of Common Ground	Wandsworth Council	Richmond has made comments regarding Archaeological priority areas as the areas are still being finalised at time of writing. Richmond also notes that housing targets as the area is already highly constrained meaning there is a lack of land for housing need. Richmond has also noted that there will be a continued cooperation in regard to transport due to close to the council's boundaries. Richmond notes on climate change adaption the continued joint working arrangements to address flood risk. On natural environment and the importance of protecting the rivers character and shared open spaces, Richmond notes this could be added as a shared issue. Richmond notes on the policy framework to assess proposed tall and mid rise buildings near the boundaries. Although not a strategic issue, note the similar approaches to sports evidence base.	11/01/2022
Tall Buildings	Further Engagement on the Local Plan (2023-2041)	Royal Borough of Kingston upon Thames	Richmond has raised concerns on the policies relating to the tall buildings adjacent to the River Thames and	29/09/2021



Strategic Issue	Details/ Activity Undertaken	Body Involved	Comments Made	Date
			the negative impact it may have on the historic and high quality character of the area with the borough as it is on the opposite bank. This particular in relation to very sensitive areas of land e.g. registered Parks and Gardens.	

## 2022/23

Strategic issue	Details/ Activity Undertaken	Body Involved	Comments Made	Date
Boat Dweller Accommodation Assessment	Duty to Cooperate in relation to Boat Dweller Accommodation Assessment	Elmbridge Borough Council	Richmond notes the need for 10 licenced permanent moorings however Richmond is not aware of any publicly owned land along the River Thames that could be available for accommodating 10 permanent residential moorings. Richmond also notes that the River Thames is designated Metropolitan Open Land (MOL) within Richmond and therefore the character and openness of the river are safeguarded from inappropriate uses. Richmond also refers to paragraph 9.16.3 <i>London Mooring Strategy</i> , produced by the Canal and River Trust, which has identified zones for potential additional moorings elsewhere in London.	11/05/2022
Housing allocation	Regulation 19 consultation on Local Plan	Elmbridge Borough Council	Richmond notes it is unable to help with any of Elmbridge unmet housing needs. Richmond did not wish to raise any cross-boundary or strategic concerns on the Elmbridge Local Plan.	29/07/2022
Focused Issue Review	Regulation 18 consultation on Local Plan 2015 - Focused Issues Review (FIR)	London Borough of Hounslow	Richmond notes with the Focused Issue review there are limited changes affecting a small number of policies and at this stage Richmond does not wish to raise any strategic or cross-boundary concerns.	16/11/2022
Statement of Common Ground	Local Plan Reviews – consultation on (Submission version) Regulation 19	London Borough of Hounslow	Richmond notes that with the progress of Richmond Local Plan their standpoint does not change the already signed statement of common ground from 2020. However, it is noted that additional sites have been added to the Site Allocation Plan including 110 Albany Riverside. Richmond notes that the site	16/11/2022

			allocations refers to Kew WHS buffer zone. Richmond seeks clarification to fully understand the updates and amendments to the site allocation and can assess whether any update to the statement of common ground is considered necessary.	
Tall Buildings	Regulation 18 consultation on new Local Plan	Royal Borough of Kingston Upon Thames	Richmond notes a concern regarding the concentration of key views outside RBKuT, on Hampton Court and Richmond Park, when the sensitive areas in our borough form a broader arc. There are sensitive designations on the Richmond side which may be impacted by the proposals in particular Registered Parks and Gardens which may be relevant to reference view, and views from other key locations such as Richmond Hill. Some views may coincide with Richmond's Local Views draft SPD. Richmond also suggests including a specific policy requirement for 3D modelling, as it is an essential tool in understanding impacts for tall buildings.	06/03/2023
Housing Need	Regulation 18 on Local Plan	Royal Borough of Kingston Upon Thames	Richmond notes it is unable to assist with any of Kingston's unmet housing need as we do not have any spare housing capacity.	06/03/2023
Climate change	Statement of Common Ground	Spelthorne Borough Council	Richmond notes that Climate change is not mentioned in the draft Statement of Common Ground which should be a shared priority for both Councils especially with the ongoing joint working around the flood risk (inc. River Thames Scheme).	16/08/2022
Housing targets	Statement of Common Ground	Spelthorne Borough Council	Richmond suggests the deletion of the 315 figures as the current housing target since the publication of the London Plan is 411 per annum. Richmond also notes it does not have capacity to meet any unmet need by any borough.	16/08/2022

Employment Need	Statement of Common Ground	Spelthorne Borough Council	Richmond notes that employment needs is a shared concern. Richmond notes itself is unable to meet our objectively assessed need for employment floorspace and therefore is unable to help with any unmet need.	16/08/2022
Green Belt	Regulation 19 Draft Local Plan	Spelthorne Borough Council	Richmond notes that Spelthorne Local Plan proposes the realise of a small amount of Green Belt after the green belt assessment show some of the land is not performing well. Richmond notes that this would not undermine the strategic Green Belt swathe that washes across the boundary between the boroughs forming part of a larger significant area. Richmond note it will be for Inspectors to assess the evidence base and the overall spatial strategy.	16/08/2022
Site Allocations	Regulation 19 Draft Local Plan	Spelthorne Borough Council	Richmond notes there are no site allocations in close proximity of the boundaries between the two boroughs. Richmond also supports Spelthorne's position regarding Kempton Park Racecourse given earlier concerns regarding the potential transport impact.	16/08/2022
Statement of Common Ground	Draft Local Plan	Wandsworth Council, joint with Fulham, Lambeth, Merton, Westminster City Council, Royal Borough of Kensington and Chelsea and Kingston Upon Thames	Richmond notes there are no strategic or cross boundary concerns that we feel to raise, as the Statement of Common Ground notes relevant cross-boundary issues. The signed Statement of Common Ground was later published <a href="#">Statement of Common Ground Between London Borough of Wandsworth and other Councils</a>	23/08/2022